

PREFACE

Following the identification of two errors within the Executive Summary of this report, a decision has been taken to remove the Executive Summary to avoid confusion. Both errors related to inaccurately cited statistics from the main report – specifically, that (a) ‘two thirds of respondents (65%) disagree with the proposal to provide caddy liners and one quarter (24%) express support’, and (b) ‘three quarters of respondents disagree that anaerobic digestion plants treating food waste should be required to include a composting phase’.

For the avoidance of doubt, government policy decisions in the Simpler Recycling consultation response, published on 21 October 2023, were informed by the main body of this report, which remains accurate and unaltered.



Department
for Environment
Food & Rural Affairs

Consistency in Household and Business Recycling in England

Summary of consultation responses

17th August 2021





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1. How to read this report

1.1. Narrative

This report summarises all the comments made in consultation responses. These are summarised by question. Within each question summary, comments summaries are grouped into categories indicating the sentiment of the comments. For most questions, these categories are **expressions of support**, **concerns**, and **suggestions**. Within each category, this report summarises the comments made.

To indicate the weight of sentiment behind each summarised comment, relative to the other comments made in response to that question, the following quantifiers have been used. These have been used on a per-question basis and are not directly comparable between questions:

- many
 - some
 - a few
- 

Many of the responses received used very similar text in some parts of their answers, suggesting that the response text had been coordinated between multiple respondents. This co-ordinated text constituted a significant proportion of the responses, and therefore of this report.

The number of respondents who answered each question is given at the beginning of the question summary. For the closed question graphs, the figure caption includes the base number indicated as n = [number].

For single select questions, the base is the number of respondents who answered the question. For multi select questions, the base is the number who responded to the consultation. Graphs are based on single select questions unless indicated. Where questions are multi select, this is indicated in the sub header that shows the question text.

For questions with both a closed and an open part, respondents may have answered either part or both. Not all those who indicate a position in the closed question will go on to comment, and not all those who comment will have indicated a position in the closed question. Therefore, there will be occasions where the majority of those who answered the closed part of the question are of a very different opinion to the majority of those who answered the open part.

For full context to the information presented in the report, including information discussed in the responses, please refer to the full consultation document, available on the Defra website.

This document summarises the responses submitted to the consultation. Traverse have read and analysed all comments, and this report encompasses all these comments, with the only exception being those which were wholly unrelated to the consultation and the broader topic area. As such, comments which do not answer the question being asked but which do address the broader area of waste and recycling have been included for the sake of transparency. It is important to note that Traverse have not attempted to judge the factual accuracy of statements made by respondents, and what is written by

respondents, and therefore summarised in this report, should be taken as opinion, not necessarily fact.

1.2. Coding tables

As stated in the Methodology, Traverse's analysis process involves reading every word in every response and assigning 'codes' to sections of responses to capture their meaning. In each question of this report a code table has been included, showing the five codes which were used the most when capturing the meaning of the answers to the question. The 'All' column shows the percentage of consultation respondents that had the code applied to their answer to the question. The following five columns show the percentage of respondents from each stakeholder group which had the code applied to their answer to the question. This is used to illustrate which groups raised each suggestion, concern, or positive comment the most. Stakeholder classification was based on the answer given to the consultation question 'Which best describes you?'. Stakeholders were then grouped into five groups as specified by Defra:

Stakeholder Group 1 (159 respondents)	Stakeholder Group 2 (277 respondents)	Stakeholder Group 3 (229 respondents)	Stakeholder Group 4 (238 respondents)	Stakeholder Group 5 (69 respondents)
Charity or social enterprise	Local government	Packaging designer/ manufacturer/ converter	Product designer/ manufacturer/ pack filler	Exporter
Community group		Distributor	Retailer (including Online Marketplaces)	Operator / reprocessor
Non-Governmental Organisation				Waste management company
Consultancy				
Academic or research				
Individual				

Any respondents whose answer to this question was not one of the stakeholder groups above is not included in one of the stakeholder columns but is included in the column titled "All".

It is important to note that all responses were read, reported on, and treated equally in the narrative and the graphs. Analysts were not able to see who each response had come from when analysing it, to eliminate any possible bias. It is also important to note that the percentages shown in the table are of the number of respondents in each stakeholder category. If there is only a small number of stakeholders in a category, then the percentage shown may be high even if only a small number had the code applied to their answer. Further, it is important to note that the coding per question cannot reflect what was written by respondents in response to other questions. For example, a respondent who is concerned about carbon emissions may raise this concern in many, but not all, questions, and their concern will only be shown in the questions in which they raised it.

2. Methodology

For the consultation data processing, coding, and reporting, Defra commissioned Traverse, an independent employee-owned organisation specialising in public consultation and engagement, with a focus on positive social impact and democratic decision making (<https://traverse.ltd/>).

2.1. Responses and response channels

Responses could be submitted to the consultation via three channels:

- Defra created an online form, hosted by Citizen Space, to which respondents could submit responses. A link to the online form was provided on the consultation page on Defra's website.
- Defra also provided an email address, drs@defra.gov.uk, to which respondents could submit responses via email.
- Defra also provided an address for any postal responses. However, no postal responses were received.

All responses imported from Citizen Space into Traverse's database, Magpie, passed immediately to the coding stage of Traverse's work. Emails and their attachments were processed into the Magpie database such that email answers to questions could be analysed alongside answers from the online form, creating consistency of analysis. Email data processing went through a quality assurance process, with the lead data processor checking the work of individuals to ensure all text was accurately entered before coding began. Any responses to Defra's deposit return scheme consultation which were marked for the Extended Producer Responsibility consultation were moved to the appropriate database so that all relevant answers were reviewed together.

2.2. Coding

Coding was managed by a dedicated lead. Thematic coding was used to capture all the comments made in all consultation responses. Coding involved reading every answer given to a consultation question and assigning codes to sections of text. Codes are designed to capture the meaning of the text, where all text assigned to the same code has approximately the same meaning. Codes continued to be added until all text was covered.

The codes formed part of a coding framework – a means of structuring all the codes used. Each consultation question was given a theme in the coding framework, within which sub-themes captured the sentiment of the coded text, which was primarily divided into **reasons given for support**, **expressions of concern** and **suggestions**. Within each sub-theme was a set of codes which captured the details of the text. The coding framework began with the lead coder reading a sample of responses and creating the initial sub-themes and codes. The coding framework then evolved, with new issues being given new codes. For a consultation of this size, a large team of coders was required, who were brought on board gradually to maintain quality control. The lead coder briefed each individual and managed the team.

To ensure quality and consistency of coding, the lead reviewed an early sample of each

individual coder's work. Findings of this review were logged and discussed with the individual. If the coding was confirmed to be of high quality, there was an ongoing check of a smaller portion of the individual's work throughout the consultation. If the coding was not of sufficient quality, the lead coder corrected the work and reviewed a much higher proportion of the work until the quality had improved. By managing both the coding team, including team meetings and discussions regarding the coding, as well as the coding framework, the lead ensured quality and consistency of the coding throughout the consultation. Traverse's Magpie database has a series of checks in place which ensures that all words are processed, coded, and reported on.

2.3. Reporting

This report was developed in two stages:

- The ideas captured within each code were summarised, so that there was a set of summaries for each question. These summaries were based on the coded data – a table of all text captured by each code, so that they were true to the original responses.
- Once this was complete, for each question, its set of summaries was edited together to form a coherent narrative describing the main points made by respondents. Themes in the coding framework are reflected using sub-sections in the report. Within each sub-section, thematically similar points are grouped together, to make for a readable narrative. Any points in the narrative which appeared unclear were re-checked against the original data in the responses.

The report then went through a quality assurance process, where it was read through and thoroughly checked for quality and consistency, with updates and changes made where necessary.

3. Participation

The consultation received 896 responses. The following shows the breakdown of how those responses were sent and how many were from each stakeholder group (respondents self-identified their stakeholder category).

3.1. Number of responses received by channel

	Number of responses	Percentage
Citizen Space	735	82%
Email	161	18%

3.2. Number of responses received by stakeholder type

Stakeholder Type	Number of responses	Percentage
Academic or research	7	0.8%
Business representative organisation/trade body	55	6.1%
Charity or social enterprise	8	0.9%
Community group	11	1.2%
Consultancy	17	1.9%
Distributor	13	1.5%
Exporter	2	0.2%
Individual	355	39.6%
Local government	255	28.5%
Non-governmental organisation	5	0.6%
Operator/ reprocessor	10	1.1%
Other	62	6.9%
Packaging designer / manufacturer / converter	38	4.2%

Product designer/manufacturer / pack filler	18	2.0%
Retailer including online marketplace	13	1.5%
Waste management company	24	2.7%
Not answered / blank	3	0.3%

4. Proposal 1: Separate collection of dry recyclable waste from households

4.1. Question 6

4.1.1. Do you agree or disagree that local authorities should be required to collect the following dry materials from all households, including flats, by the end of the financial year in which payments to local authorities under Extended Producer Responsibility for packaging commences (currently proposed to be 2023/24 subject to consultation)?

4.1.2. Aluminium foil

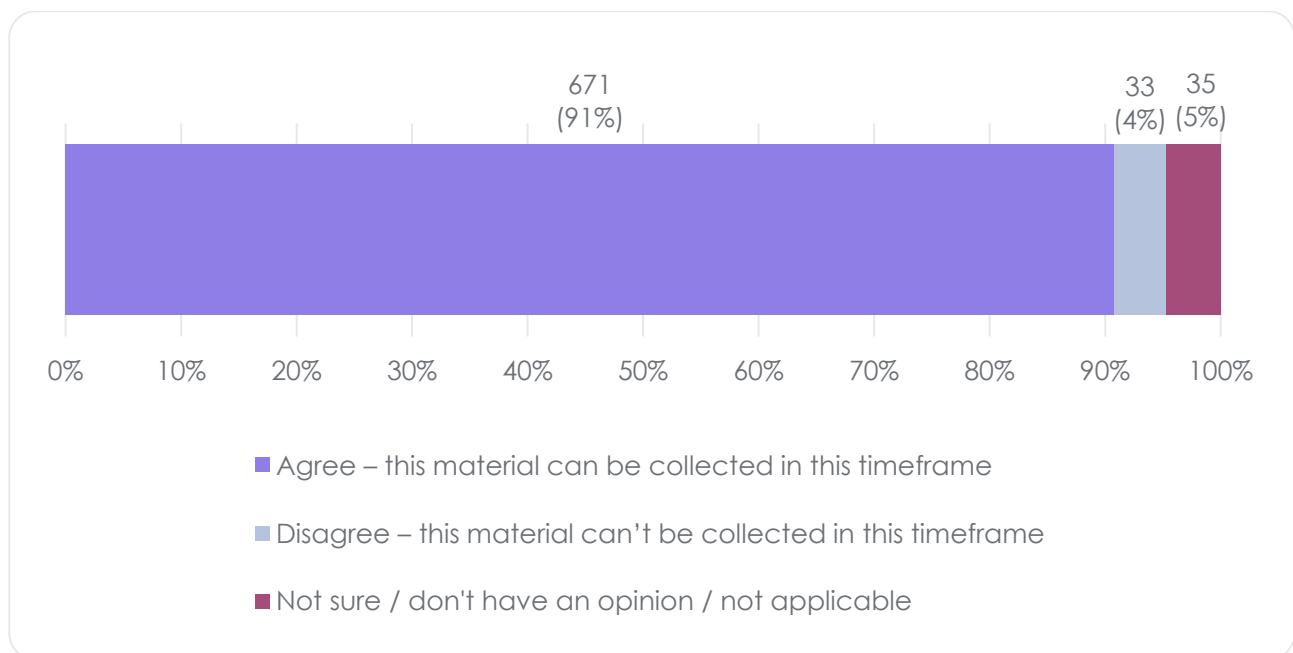


Figure 1 Question 6 - aluminium foil, (n=739)

4.1.3. Aluminium food trays

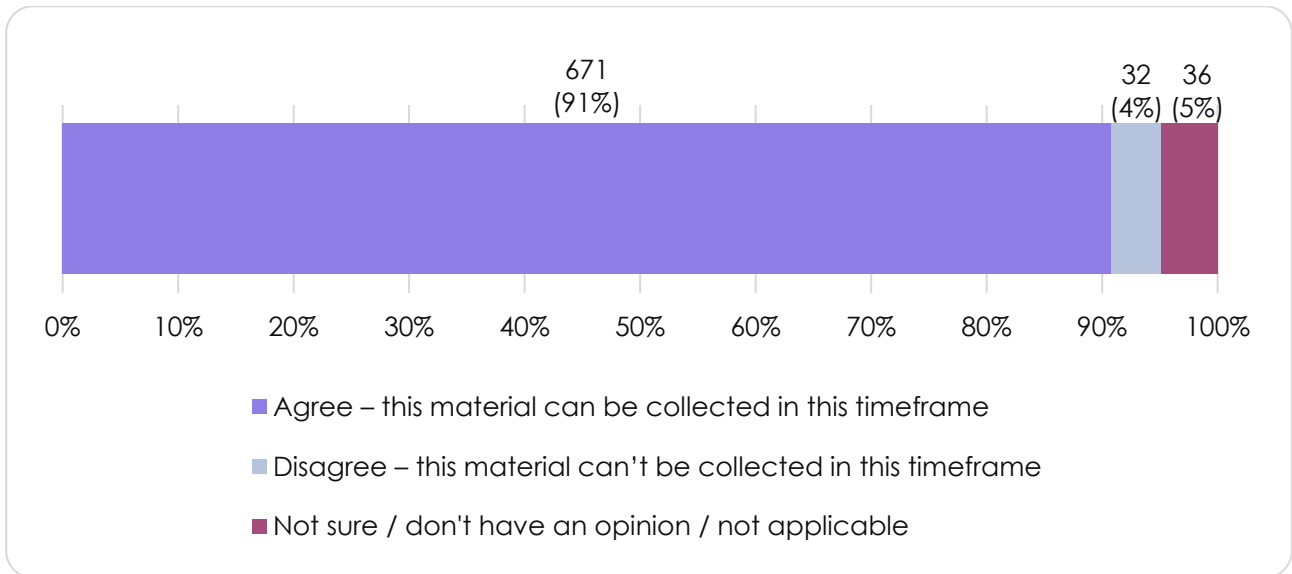


Figure 2 Question 6 - aluminium food trays, (n=739)

4.1.4. Steel and aluminium aerosols

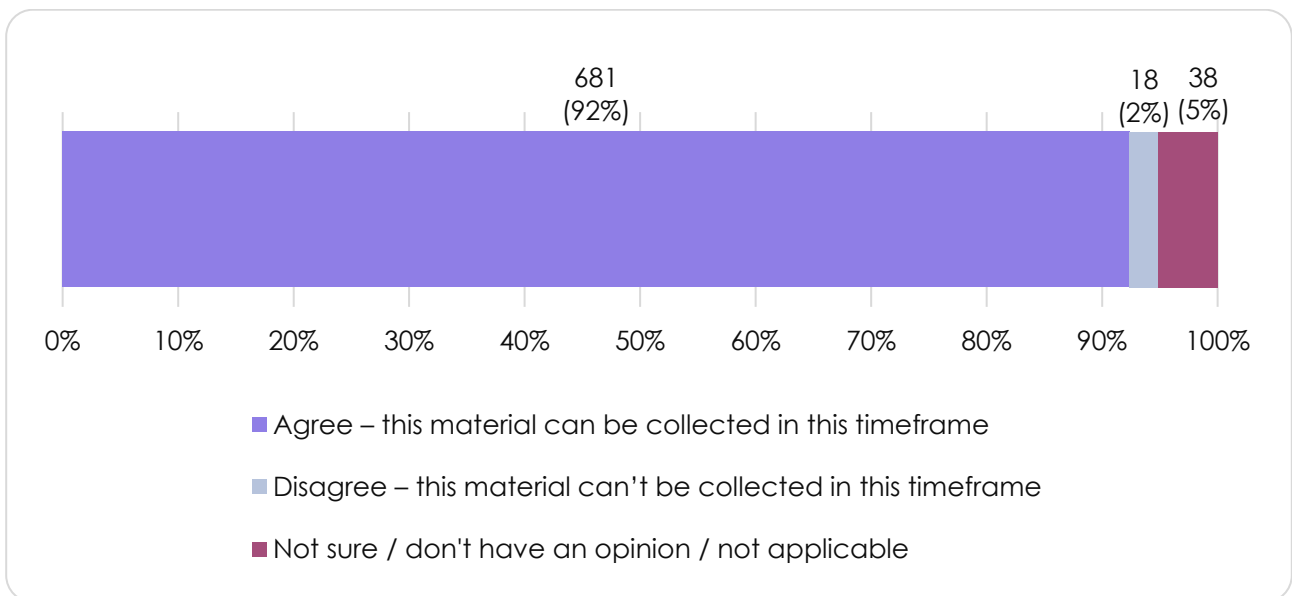


Figure 3 Question 6 – steel and aluminium aerosols, (n=737)

4.1.5. Aluminium tubes

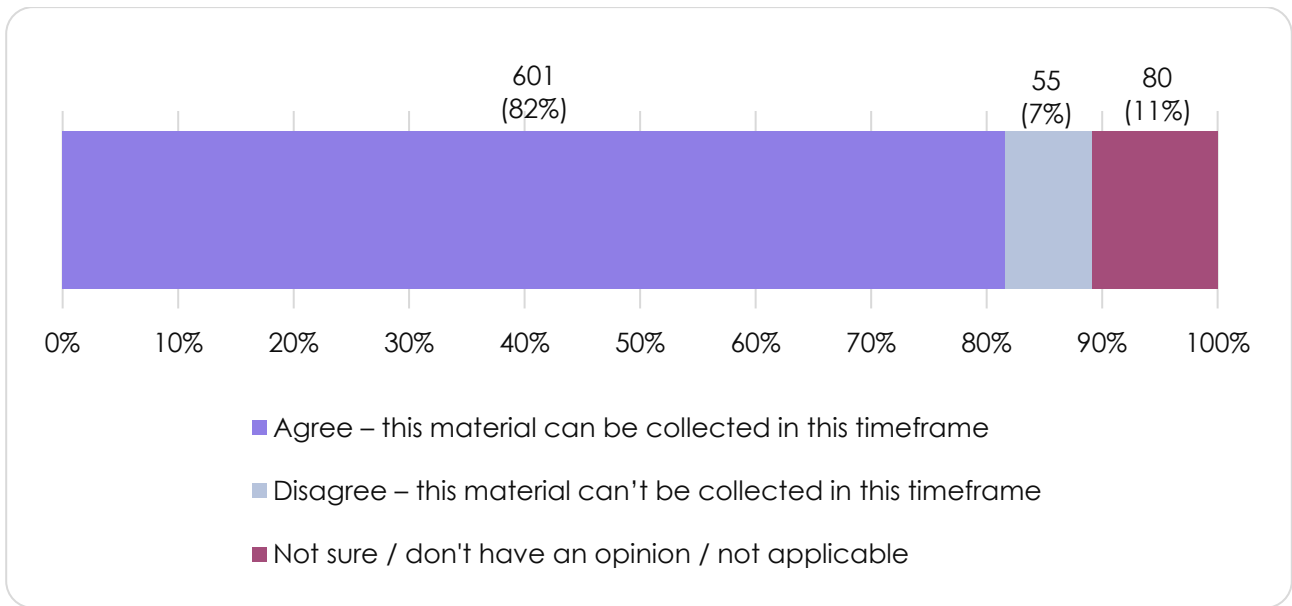


Figure 4 Question 6 – aluminium tubes, (n=736)

4.1.6. Metal jar lids

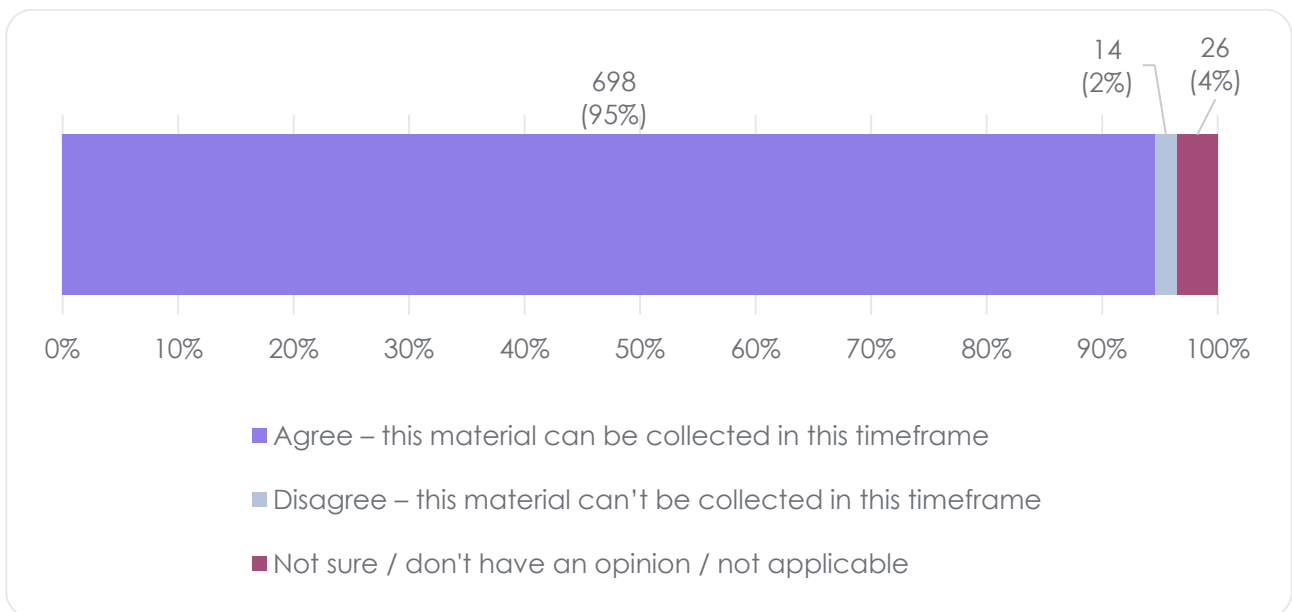


Figure 5 Question 6 – metal jar lids, (n=738)

4.1.7. Food and drink cartons

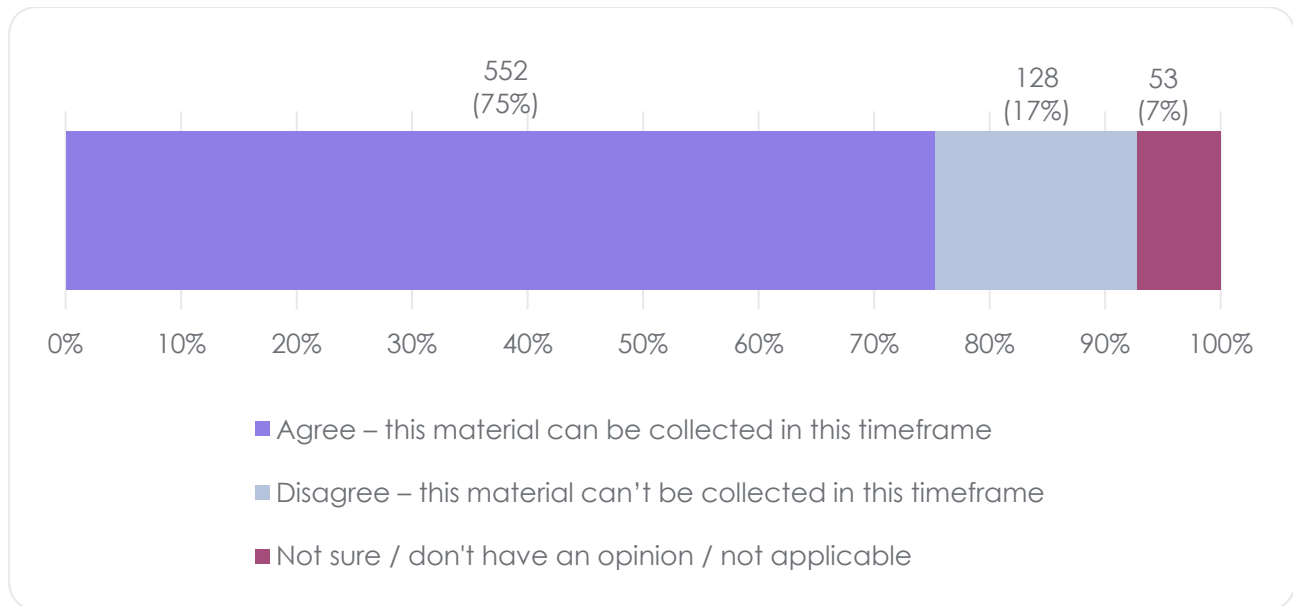


Figure 6 Question 6 – food and drink cartons, (n=733)

4.1.8. Comments

Question 6 was a closed question which did not give space for comments. However, some respondents made comments in emails, or in response to other questions, which were labelled as being for this question. Their comments are summarised below. Much of what was said is encompassed in the summary to Question 7, so is reported only in brief here.

Concerns

Many respondents express several general concerns with the proposals:

- that existing infrastructure may not yet be capable of collecting, sorting, and processing all the proposed materials;
- that, because of the above, additional investment may be needed to meet the timescale for implementation;
- that flats may have limited storage for containers and restricted storage on the street, and that Government needs to clarify if this also applies to flats above shops; and
- the impact of the deposit return scheme in relation to the value and volume of proposed listed materials (without specifying further).

Respondents also express concerns about specific named materials:

- Some respondents express concerns about the ability of materials recovery facilities to sort **food and drink cartons**, comment that food and drinks cartons are treated as contaminants to the fibre stream, or question whether end markets exist for these materials.
- A few respondents express concerns that **steel and aluminium aerosols** may present health and safety considerations for fire risks.

- A few respondents express concern with the inclusion of **aluminium foil, food trays and tubes** as these items might contain food residue, might contaminate other waste streams in a co-mingled service, or express concern about sorting capability for this material.

A few respondents express general concern, or caution, about the inclusion of plastic films on the list of dry materials that local authorities should be required to collect from all households, either because of the challenges involved in separating the materials, or without specifying further.

Suggestions

A few respondents make varied other suggestions in relation to the proposal. For example: that the proposed materials should be subject to TEEP (technically, environmentally, or economically practicable) assessments, that batteries and textiles should be include in the proposed list of materials, or that public education campaigns would need to be launched for the scheme.

Support

Many respondents express general support for the proposed list of dry materials that local authorities should be required to collect from all households, including flats. Some respondents comment that they support all of the proposed list, while other respondents state materials from the proposed list which they support collection for.

Some respondents express support for the inclusion of aluminium foil and food and drinks cartons on the list of dry materials that local authorities should be required to collect from all households, but with a caveat. Respondents state the support is contingent on their inclusion after a review of where changes to the core set of materials are identified.

4.2. Question 7

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

This question was answered by 401 respondents. Their comments are summarised below.

The table below lists the codes that were most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Specific named material Food and drink cartons, Tetrapaks	19%	2%	54%	2%	6%	22%
Concerns Specific named material Al tubes	12%	2%	36%	0%	0%	8%
Concerns MRFs - lack of capability / sorting problems / not ready	7%	1%	21%	2%	3%	11%
Support Support (general)	7%	2%	10%	8%	23%	17%
Concerns Concern (general)	5%	2%	10%	8%	10%	11%

Support

Many respondents express their general support that the proposed materials could be collected within the timescale on the basis that many of the materials are already widely collected by local authorities.

Concerns

Aluminium foil and food trays

Many respondents express several concerns related to the collection of both aluminium foil and food trays. For example:

- cooked on food residue causing contamination of waste streams;
- lack of consistent and viable end markets for these materials;
- lack of sorting infrastructure currently in place;
- storage of the material leading to degradation where proper recycling is no longer viable; and
- communication with consumers to allow for understanding of what is required.

Aluminium tubes

Many respondents express concerns about the difficulty of cleaning food contamination from the inside of aluminium tubes and the unreasonable expectation of the public to clean them out before placing in the recycling bin.

Food and drink cartons, TetraPaks

Many respondents express concerns related to food and drink cartons and TetraPaks. For example: cartons may be flattened by householders or collection vehicles, which may make them more difficult to sort at materials recovery facilities; unreliable and insufficient end markets for this product; public compliance to place cartons/TetraPak in plastic waste streams over paper/cardboard; degradation of material in long lead times between collection and processing; lack of appropriate sorting facilities for cartons in England; and the impact of food contamination on pest control.

Steel and aluminium aerosols

Some respondents express concerns for health and safety issues relating to compressing gas left in aerosols not properly emptied by consumers. Respondents feel this could increase hazards at materials recovery facilities. A few respondents also express concerns about viable end markets for this product if deposit return scheme removes aluminium cans from waste metal streams.

Metal jar lids

A few respondents express concerns that metal jar lids could become lost in waste streams if not attached to the original container. Many respondents express concerns for potential fines if lids are lost.

Consumer compliance and enforcement

- Many respondents have concerns that the proposal of source separated collection may complicate rather than simplify the recycling process for residents, therefore going against the aims of consistency. Many respondents feel that current co-mingled collections run successfully and express concern that changing to source separated will not yield an adequate increase in recycling rates.
- Some respondents express concerns about the contamination of waste streams due to food residue, particularly for paper/cardboard and aluminium foil/tubes. Respondents feel this proposal relies too much on good consumer behaviour to wash materials properly.
- Many respondents express concerns about the inclusion of flats/ houses of multiple occupation in the proposal as it could be hard to enforce landlords/managing agents to ensure the proper facilities are available for tenants.
- Some respondents express a concern that transient tenants may not participate in source separation and therefore contamination could be a major issue. A few respondents express a concern over lack of space for additional containers and a possible negative impact on the streets.

Capability and capacity of infrastructure

- Some respondents express concerns that sorting facilities and reprocessors would not accept and recycle any materials with additional food contamination. A few respondents express concerns that food residue could attract rodents and other vermin.
- Many respondents express concerns that materials recovery facilities may not be equipped with the capability or infrastructure to sort and process a number of the proposed materials. These include cartons, aluminium tubes, and aluminium foil.
- A few respondents express concerns about the availability of suitable vehicles required to collect proposed waste streams and related costs.
- A few respondents express concerns about the availability of increased sized containers needed for source separated collections and related costs.
- A few respondents express concerns for the capacity of transfer stations to be able to store products collected from source separated collections.

- A few respondents express concerns that a mobilisation period of 12 months is too short to implement necessary infrastructure for source separated collections.

Additional costs and contracting

- Some respondents express concerns that many local authorities already operate co-mingled collection services, and separating collections could result in additional costs. For example, providing additional containers, funding necessary communications to households, and implementing necessary infrastructure.
- A few respondents express concerns about the impact on existing contracts by the addition of the proposed materials, with some specifying contracts between local authorities and waste treatment organisations. Many respondents point out that long term contracts could require extensive changes and any new short term contracts made to accommodate changes could have risks attached.

Viability of end markets and reprocessing rates

- A few respondents voiced concerns that viable end markets are not currently available for some of the proposed materials in particular, cartons and foil.
- A few respondents express concerns that collection rates may not match reprocessing rates. Many respondents fear this could lead to dishonesty with residents regarding how much of their waste is being properly recycled.

Carbon emissions

- A few respondents express concerns about increases in carbon emissions because of more vehicles on the road to accommodate a source separated service.
- In addition, a few respondents express concerns for transporting TetraPak/cartons long distances due to limited sorting infrastructure and the resulting impact on carbon footprint.

Relationship with Extended Producer Responsibility

Some respondents express concerns for uncertainty over any impact of Extended Producer Responsibility, for example uncertainty surrounding Extended Producer Responsibility funding causing delays to the implementation of Consistency in Household and Business Recycling, and delays potentially affecting the feasibility of the proposed deadline for source separated collection. Respondents express concerns for the discrepancy between UK wide Extended Producer Responsibility, and Consistency in Household and Business Recycling reforms focused only on England, and the distorting impact this could have on achieving consistent recycling.

Relationship with the deposit return scheme

A few respondents express concerns for the impact of the deposit return scheme in removing quality materials from collections therefore affecting potential income for local authorities.

Suggestions

Further assessment and trials

- A few respondents suggest that further assessment is needed for the definition of

the proposed materials and the feasibility of a 2023/24 deadline.

- A few respondents suggest that local authorities should have the powers to trial new material types to continue innovation in waste management and to act against residents who continually contaminate waste streams.

Scope of the proposals

- A few respondents suggest that all common use materials should be collected, not just food packaging. Many respondents suggest Consistency in Household and Business Recycling should be implemented UK wide simultaneously with Extended Producer Responsibility.
- Some respondents feel that Government could potentially be more ambitious and include all possible waste streams, such as cartons and glass, not just food packaging, in their proposals to increase recycling rates and further reduce the amount of waste going to landfill.

Improving clarity of guidance

- Some respondents suggest that further clarity of the guidance is needed to ensure the proposal works. They suggest that the success of the proposal depends on resident participation. Therefore, clear, and strong communications should be made on local and national levels to educate residents to present materials in the required way.
- Some respondents suggest clarity is particularly required for fibre-based products to know whether a material should go into a plastics or paper/cardboard waste stream. A few respondents suggest many of the examples given in the proposal refer to food and drink waste with little reference to other domestic waste. Respondents suggest it should be made clear that the guidelines apply to all packaging.

4.3. Question 8

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

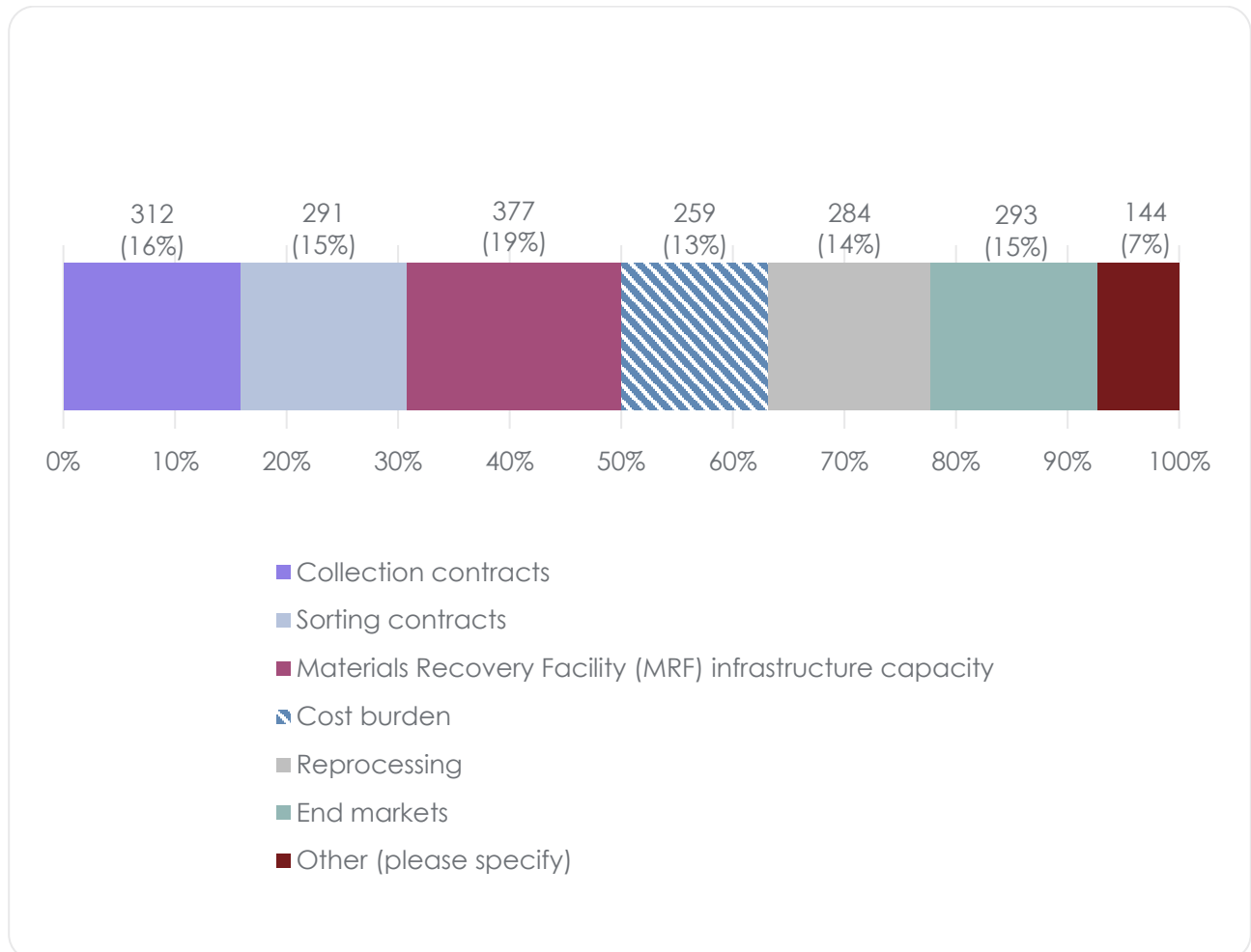


Figure 7 Question 8, (n=550)

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

This question was answered by 486 respondents. Their comments are summarised below.

This section also summarises comments from respondents in response to the option “Other (please specify)” in question 8 (above). 124 respondents offered comments in response to this question. These two parts of the question are summarised together because of the overlap in the answers given to each question.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Reason to extend MRF infrastructure capacity	19%	1%	57%	4%	0%	19%
Suggestions Reason to extend End markets not ready	18%	4%	51%	0%	0%	28%
Suggestions Reason to extend Cost burden	17%	2%	50%	0%	0%	11%
Suggestions Reason to extend Collection contracts	16%	1%	49%	0%	0%	17%
Suggestions Reason to extend Inadequate infrastructure (general)	13%	4%	30%	0%	6%	3%

Respondents raise a range of concerns and suggest extensions. However, they do not always link the two, and even where they do, a range of extensions is suggested for each concern.

Positive comments

Some respondents express general support for the kerbside collection of all materials by 2023/24 as they believe there are no reasonable excuses for local authorities to delay. Many respondents express support for the timescale in driving up recycling rates in the UK.

Some respondents express general support for the kerbside collection of the proposed dry materials because they feel many local authorities already collect these materials and the impact of the addition of metal packaging, foil and aerosols should be minimal.

A few respondents express support for the inclusion of aluminium packaging because it could help to reduce landfill waste.

Concerns

Some respondents express concerns for engaging the public in source separated collections because some residents may refuse to participate and continue to use a single recycling bin. In addition, respondents express concerns for the negative perception of a lack of end markets and the impact of this on public trust that waste is being recycled properly.

A few respondents express concerns about the impact of multiple waste streams on residents and local authorities. Respondents express concerns that this proposal will require too many bins for residents and where they do not have space this could lead to reduced

participation. Regarding local authorities, respondents express concerns that moving from co-mingled collection to segregated collections will require major changes for local authorities that could ultimately lead to inefficiency.

A few respondents express concerns for the environmental impact of increased collections to accommodate for segregated materials, in particular increased vehicle emissions.

Suggestions

Respondents identified a wide range of possible reasons for extending the proposed start date of 2023/24:

Many respondents make suggestions of challenges faced by flats and house of multiple occupation in implementing source separated collections. For example:

- lack of space for extra containers;
- lack of ownership of individual bins resulting in poor recycling and contamination;
- issues with education and enforcement particularly with transient tenants; as well as
- cooperation of landlords in providing the necessary facilities and containers.

Many respondents suggest a lack of viable and sustainable end markets exist for several the proposed materials. For example: plastics pots, plastic tubs, plastic trays, plastic films, flexible plastics, aluminium foil, aluminium trays, and cartons. Respondents suggest viable end markets are an important factor in ensuring materials are recycled properly.

Many respondents suggest that several cost burdens associated with the shift to source separated collection and Consistency in Household and Business Recycling proposals could impact the 2023/24 deadline. These cost burdens include:

- new vehicles costs;
- new recycling bin costs;
- early exit contract costs;
- any costs for infrastructure to accommodate new waste streams;
- increased staffing costs; and
- disposal costs where proposed materials are currently identified as a contaminant.

Some respondents also suggest that alignment may be necessary between Extended Producer Responsibility funding and new burdens funding for food waste, to avoid a negative impact on the collection system.

Many respondents make comments relating to existing contracts:

- Many respondents suggest that any changes to kerbside collection could affect existing collection contracts in relation to capacity and additional requirements for food waste. Respondents suggest it would be most cost effective to implement kerbside collections of proposed materials at the end of existing contracts, although they recognise this could be done sooner if both parties agreed.
- Many respondents suggest that existing contracts of local authorities must be considered as well as the potential related costs associated with terminating

these contracts earlier to accommodate the 2023/24 deadline. Respondents suggest early terminations may be possible where both parties agree, and Government is prepared to fund any related costs because of early exists.

- Many respondents suggest the achievability of the 2023/24 date is not about the ability to collect materials but rather with the impact of collection changes on the length of existing sorting contracts. Any amendments to contracts, such as material additions, should be made at the end of the current contract period as respondents feel this would be most cost effective method.
- A few respondents suggest that changes to waste streams and resulting impact on disposal contracts could require extensive internal and external resources to make changes to an existing complex project. Respondents also express concerns of reputational damage for authorities and Defra should contracts be disrupted due to new Consistency in Household and Business Recycling proposals.

Capacity of infrastructure, vehicle fleets and staff

- Many respondents suggest that inadequate infrastructure for source separated collections could give reason to delay collection services until after 2023/24. Several infrastructure issues are highlighted. For example, space at depots for parking new vehicles, staffing requirements, additional sorting technology and capacity at transfer stations.
- Many respondents suggest that the current infrastructure and capacity of many materials recovery facilities may not be configured to accept the proposed additional waste streams, as materials recovery facilities are designed with the current collection system in mind. Therefore, a redesign of materials recovery facilities could be required for a new collection method. Respondents highlight aluminium foil, aluminium tubes, and cartons as materials of concern. Respondents express concerns for the ability of materials recovery facilities nationwide to be ready by 2023/24 if the majority require upgrades.
- Some respondents suggest that the waste industry does not currently have the necessary infrastructure to cope with the addition of TetraPak/cartons to waste streams. Respondents express concerns for the following reasons:
 - a lack of sustainable end market for cartons;
 - potential contamination of fibre mix impacting negatively on material quality and income; and
 - current hand sorting processes requiring technology upgrades.
- Many respondents suggest that reprocessing capacity would be available for the proposed materials, but sorting facilities may be unable to separate materials to the required level for reprocessors. This excludes cartons and aluminium foil, however, as respondents express concerns over the number of facilities able to reprocess cartons and the potential food contamination issues with aluminium foil.
- Some respondents suggest that the availability of bespoke vehicles for source separated collections could be another reason to extend the deadline. Respondents express concerns for markets being unable to meet demand for bespoke vehicles which could lead to longer lead times and result in extra costs.

- Some respondents suggest that the need to increase and train frontline staff would cause delay to the 2023/24 deadline. In particular, respondents highlight a national shortage of HGV drivers as a potential challenge.

Local authority preparation

- Many respondents suggest that local authorities need adequate time to prepare given the associated issues with moving from a co-mingled service to a source separated collection. For example, general infrastructure requirements, providing clear communication for residents to encourage participation and current contract lengths. Respondents suggest that where local authorities may face individual issues and challenges a flexible approach to the 2023/24 deadline should be taken.
- A few respondents suggest that adjustments to the timeframe may be required for two-tier authorities where waste collection authorities may face issues with collection contracts and Waste Disposal Authorities need to evaluate and make necessary changes.

Relationship with Extended Producer Responsibility and deposit return scheme

- Some respondents suggest that incoming changes via Extended Producer Responsibility and the deposit return scheme make it difficult for local authorities to plan future collections. This is because the deposit return scheme could impact on the types of materials being collected kerbside, such as aluminium cans.
- In addition, some respondents suggest that any delays to Extended Producer Responsibility could impact the ability to implement source separated collections by 2023/24. Respondents also express concerns about residents' frustrations over changes to services, as a result of Extended Producer Responsibility, deposit return scheme and Consistency consultations.

Suggestions – relating to the proposed start date

Respondents make several suggestions relating to the proposed start date and in relation to overcoming local issues and challenges:

Many respondents suggest collections should start as soon as possible and consider any delays would go against the central aim of consistent collections. Respondents suggest Government should support local authorities to overcome potential challenges rather than extending the deadline.

Some respondents suggest that local authorities should begin collections from the deadline because end markets and reprocessing capacity would not be applicable to individual local authorities.

A few respondents suggest that businesses and local authorities should make changes simultaneously and therefore delays to the proposed deadline should not be encouraged for local authorities.

Some respondents suggest that source separated collections should start 12-18 months later because of time needed for planning and implementing infrastructure.

Some respondents suggest that source separated collections should start 2-3 years later to allow time for the impacts of Extended Producer Responsibility and the deposit return

scheme to be assessed. Respondents feel this will allow for easier collection planning and increased compliance.

Some respondents suggest collections should start later because they feel the proposed timeline is not feasible to organise adjustments required for source separated collections.

Some respondents suggest a more detailed timescale is required to properly assess the feasibility of a 2023/24 deadline. Respondents suggest a phased approach to implementing source separated collections with Government funding for local authorities who make the transition early. Respondents suggest that the deadline should be delayed by 4-5 years because large-scale service changes could take time to fully roll out to all households.

Overcoming local issues

- Some respondents suggest a nationwide approach to overcoming any local issues that could delay the deadline, such as by shared sorting infrastructure between local authorities. Respondents suggest that plastic, foil, and cartons should be addressed as part of the first formal review of Extended Producer Responsibility, deposit return scheme and Consistency in Household and Business Recycling consultations. A few respondents also suggest more pressure on packaging producers to design out unnecessary waste materials.
- Some respondents suggest any issues listed should be treated as challenges to overcome rather than obstacles to prevent the proposed 2023/24 deadline.

Interaction and alignment with Extended Producer Responsibility

- Some respondents suggest that where local authorities are exempt from the deadline, Extended Producer Responsibility fees should be reduced accordingly because they feel businesses were not offered opportunities to opt out of changes.
- Some respondents suggest that the source separated collection deadline should align with wider Extended Producer Responsibility changes.

4.4. Question 9

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

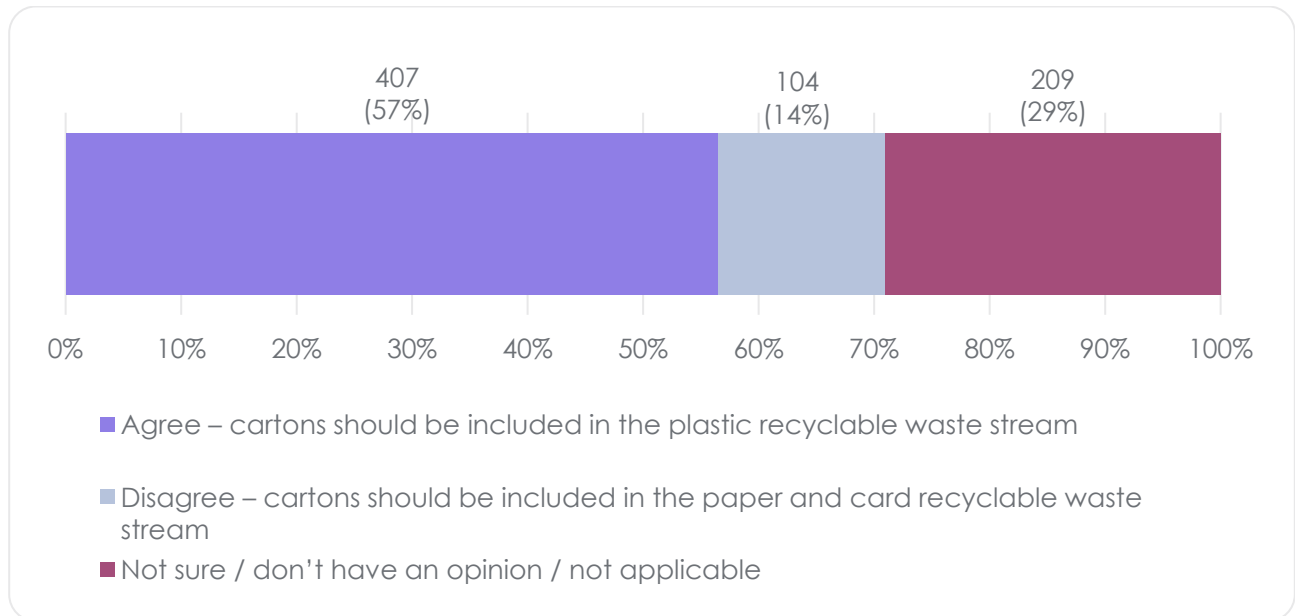


Figure 8 Question 9, (n=720)

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

This question was answered by 466 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Communication and roll-out	12%	4%	22%	24%	10%	11%
Support for cartons in plastic stream (Agree option) Less contamination	10%	4%	15%	4%	16%	19%

Support for cartons in paper stream (Disagree option) More intuitive / already associated	8%	5%	12%	22%	0%	3%
Concerns MRFs - lack of capability / sorting problems / not ready	7%	1%	19%	0%	0%	6%
Concerns Difficult to recycle	6%	3%	11%	4%	3%	25%

Agree – drink cartons should be included in plastic stream

Some respondents express support for the proposal because some local authorities already collect cartons with the plastic waste stream.

Many respondents express support for collecting cartons with plastic because they believe materials recovery facilities can more easily separate cartons from plastic than from paper, especially when cartons have been flattened by collection vehicles.

Many respondents express support for the proposals on the basis that cartons may more easily contaminate and reduce the quality of paper recyclate than plastic recyclate. For example, plastic reprocessors may wash material before recycling, so may find it easier to deal with cartons that have been contaminated with liquid and food residue. Some respondents believe that, since paper mills may treat cartons as contaminants, collecting them with plastic may lead to more cartons being recycled.

Disagree – cartons should be with paper and card stream

Many respondents who disagree express support for collecting cartons with paper because they believe this is the less confusing approach for householders, who may associate cartons with paper. Some respondents believe that choosing the option they believe is more intuitive would make recycling easier and encourage public participation.

Positive comments

Some respondents express general support for consistent kerbside collections of cartons because they believe that all recyclable materials should be recycled instead of being sent to landfill.

Concerns

Respondents express several concerns relating to the specific proposal. They also raise broader concerns:

Contamination and consumer compliance

- Some respondents express concerns that cartons may contaminate whichever waste stream is chosen, which could decrease the quality of recyclate and increase preventative sorting costs.
- A few respondents express concerns that householders may fail to clean cartons before recycling them. Respondents believe that food and drink residue could contaminate the paper waste stream, while residual oils could contaminate

plastics.

- Many respondents express concerns that collecting cartons in the plastic stream may be difficult to communicate to householders, who may misunderstand and contaminate the paper stream with cartons. Other respondents believe that cartons may be difficult to separate from paper if the two are collected together.
- Some respondents express concerns that plastic reprocessors may regard cartons as contaminants, and that contamination could decrease recycling income for local authorities. Some respondents suggest that the costs of addressing contamination should be covered by Extended Producer Responsibility.

Capability of materials recovery facilities

- Many respondents express concerns about the ability of materials recovery facilities to sort cartons from plastic containers and believe that materials recovery facilities should have a say in which material stream cartons are collected with. Respondents believe that increased sorting requirements would require investment in infrastructure and increase prices for local authorities.
- Some respondents express concerns that some local authorities currently collect plastic and paper together, and some materials recovery facilities treat paper and cartons as one category.

Many respondents express concerns that composite materials such as cartons, and especially TetraPak, may be complex and difficult to recycle. Some respondents believe the infrastructure and end markets for recycling cartons are insufficient, and therefore cartons should be disincentivised from use and not collected at kerbside.

A few respondents express concerns about the potential financial costs of the proposals, for example if investment in additional vehicles is required to collect cartons.

Some of those who express concerns over a perceived lack of carton reprocessors, point out that it may affect Extended Producer Responsibility payments to local authorities if some cartons cannot be recycled.

Some respondents express concern that sufficient end markets for recycled cartons may not exist, which could mean that cartons do not meet the consultation's criteria for introducing a new waste stream.

Some respondents express concerns that the timescale of the proposals may be challenging, especially if sufficient sorting infrastructure and end markets are not in place by 2023/24. Some respondents suggest that carton collections should start at the same time as collections of plastic films, without explaining why.

A few respondents express concerns that multiple containers may confuse householders or cause issues with storage space. Other respondents generally disagree with kerbside collections of cartons because, for example, they are satisfied with existing recycling systems, or they believe additional collections may require more transportation and increase carbon emissions.

Suggestions

Communications and behaviour change

- Many respondents suggest that clear communications are needed for

householders, for example about which stream cartons belong in and how they should be cleaned before collection, may be necessary for the proposal's success. Other respondents believe more clarity is needed around the definition of 'food and drink cartons', including whether it includes other composite packaging such as paper cups or Pringles tubes.

- Some respondents suggest introducing behaviour change initiatives such as the RECOUP Pledge2Recycle Plastics initiative.

Many respondents suggest that cartons should be collected separately, for example at local collection points or recycling banks, to avoid sorting costs and contamination of other waste streams. Other respondents suggest that cartons should be collected with plastic but reprocessed separately to ensure all components are fully recycled.

Many respondents express concerns that householders may find the proposals counter intuitive. They believe that local authorities should not be penalised for contamination if they are making efforts to communicate with householders, and that if the proposals go ahead, cartons and plastic should be considered exempt from the requirement to be collected separately, without the need for local authorities to complete a written TEEP assessment.

Extended Producer Responsibility, deposit return scheme and cartons

- Many respondents suggest that Extended Producer Responsibility funding for local authorities should cover the costs of communications campaigns, any increases to materials recovery facility gate fees, and the full net costs of implementing the proposals. Some respondents suggest that the Extended Producer Responsibility Scheme Administrator should advise on the collection and sorting method for cartons, and that Extended Producer Responsibility should be used to design cartons out of the system.
- Some respondents express concerns that the introduction of modulated Extended Producer Responsibility fees may discourage the use of composite packaging such as cartons and suggest that Government should delay the proposals until the impacts of Extended Producer Responsibility can be assessed. Some respondents believe that the deposit return scheme may release sorting capacity at materials recovery facilities or change the composition of the plastic recycling stream.

Provide choice over waste streams

- Some respondents suggest that materials recovery facilities and reprocessors should decide or be consulted about which waste stream cartons will be collected with, and that this may vary between materials recovery facilities.
- A few respondents suggest that local authorities should be allowed to choose which waste stream cartons are collected with, due to regional differences in collections, sorting and reprocessing capabilities, and end markets.

A few respondents suggest that carton manufacturers should take on responsibility for their products, invest in making them more easily recyclable, and clearly state the composition of their products and the recycling stream they belong in.

Some respondents suggest that further cost-benefit analyses of the most effective

collection, sorting and processing systems may be needed.

A few respondents make other suggestions that include emphasising the manufacture of alternative TetraPak; introducing a recycling target for cartons and single-use drink cups; cartons should be 'life limited' because they are not easily recycled; and a suggestion that new burdens funding should extend to reprocessors, who may need to adapt their operations in response to the proposals.

4.5. Question 10

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

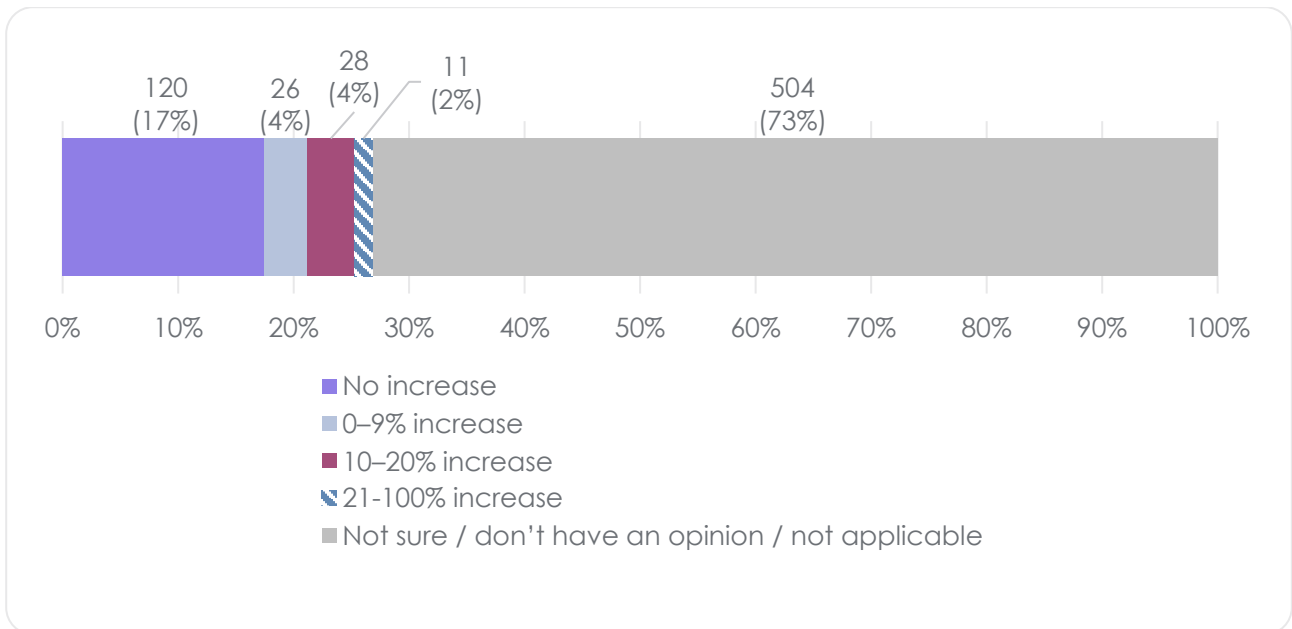


Figure 9 Question 10, (n=689)

4.5.2. Please provide the reason for your response.

This question was answered by 388 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and

Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5

Financial impact Concern / higher	10%	4%	23%	8%	13%	0%
Financial impact Will vary	8%	3%	14%	16%	10%	14%
Financial impact Likely to increase due to need for MRF investment	5%	0%	17%	0%	0%	3%
Concerns Lack of detail in proposal	5%	2%	9%	6%	0%	14%
Already done locally	4%	2%	11%	2%	3%	0%

Support

A few respondents express support for the proposals because they believe that increasing carton collections may help to create a stable end market for the material and decrease gate fees over time. Another respondent believes that the deposit return scheme may free up sorting capacity at materials recovery facilities, which could be used to sort cartons.

Concerns

Investment in materials recovery facilities leading to an increase in gate fees

- Many respondents express concerns that the proposals may cause gate fees and processing costs to rise, for example if materials recovery facilities need to invest in additional sorting technology and staff, or if the inclusion of cartons decreases revenue for materials recovery facilities due to contamination.
- Some respondents also believe that without better sorting technology, cartons may contaminate paper recycle.

Not yet possible to assess financial impacts

- Some respondents express concerns that materials recovery facilities may require details on regulations and the proposed timelines before they invest in infrastructure, and believe that Extended Producer Responsibility, deposit return scheme and price volatility in end markets may affect the financial impact of the proposals.
- Some respondents express concerns that it may be difficult to predict the financial impact of these proposals, especially without additional data and detail. Respondents also make suggestions such as measuring financial impact in £s per tonne of cartons and undertaking a cost-benefit analysis to predict costs.

Financial impacts will vary

- Many respondents express concerns that gate fees for local authorities may vary depending on the materials recovery facility and mix of materials.
- A few respondents believe that gate fees may increase in the short term but reduce as recycling becomes more efficient.
- Some respondents comment that some local authorities already collect food and drink cartons, so they may be unlikely to see any increase in gate fees and processing costs.

Financial impacts – other concerns and comments

- Some respondents express a range of other concerns about the financial aspects of the proposals. For example, some respondents believe that any increase in costs should not prevent recycling, producers should address the recyclability of their packaging, and that contamination of the paper stream may impact Extended Producer Responsibility payments to local authorities.
- A few respondents believe that an increase in the costs of sorting plastic from cartons may be offset by a decreased need to sort through the paper and card stream.

A few respondents express concerns about a perceived lack of end markets for recycled cartons.

Some respondents express concerns that current recycling infrastructure may be inadequate and materials recovery facilities may need to sort cartons manually or develop infrastructure to accept TetraPak.

Suggestions

A few respondents suggest that the impact of the proposals on the residual waste stream should be considered, because the removal of cartons from this stream may require contract renegotiation.

Some respondents suggest that materials recovery facilities are best placed to respond to this question.

A few respondents suggest that cartons should be phased out or disincentivised in favour of more easily recyclable packaging.

Some respondents suggest that producers should be made to pay the full net costs of managing carton waste under Extended Producer Responsibility, and this should include any gate fees paid to materials recovery facilities.

Some other respondents believe that Extended Producer Responsibility reforms may generally put local authorities in a better financial position, from where they may be able to shoulder increased gate fees.

Some respondents make other suggestions, including that carton producers should contribute to funding new sorting technology at materials recovery facilities, and that Government should ban increases in council tax to prevent local authorities from passing any increase in costs down to householders.

5. Proposal 2: Collection of plastic films from households

5.1. Question 11

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

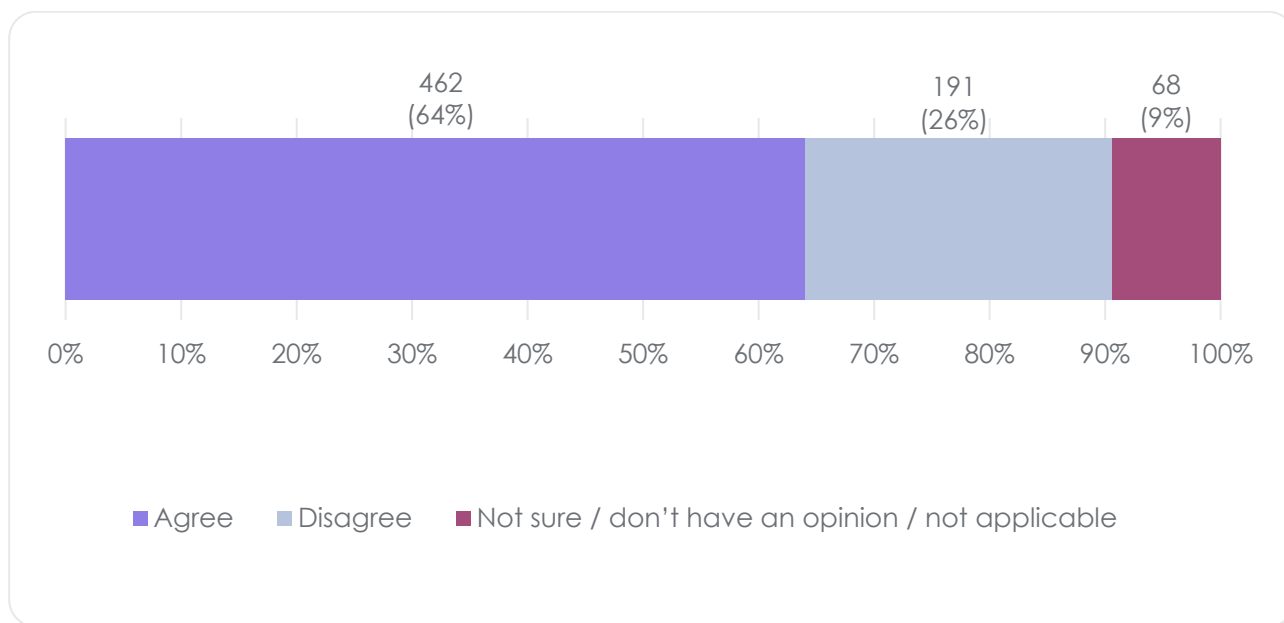


Figure 10 Question 11, (n=721)

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

This question was answered by 366 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Demand and end markets	15%	0%	46%	4%	0%	22%
Concerns MRFs - lack of capability / sorting problems / not ready	13%	1%	38%	4%	0%	19%

Suggestions Timing Implement sooner - ASAP / not specified	11%	9%	0%	27%	45%	19%
Concerns Film quality/contamination	9%	2%	25%	4%	3%	6%
Concerns Financial cost (general)	8%	1%	24%	0%	6%	8%

Concerns

Space for containers and increasing collection streams

- Some respondents express concerns that some households, especially flats and houses of multiple occupation, may lack the space required for additional containers, and also that the additional vehicles required to collect separate streams may increase carbon emissions.
- A few respondents express concerns that if sorting capability is insufficient, films and flexibles may have to be collected separately from other materials. They believe this may make the proposed start date unrealistic and affect carbon emissions and the efficiency of collections.

Feasibility of timescale for local authorities

Some respondents express concerns that the proposed timescale may not be feasible for some local authorities due to the changes that would be required to implement the proposals, though do not necessarily specify an alternative timescale.

Uncertainty about end markets

- Many respondents express concerns that current end markets for films and flexibles are insufficient. Some respondents do not support the proposal for this reason.
- Some respondents note that the Extended Producer Responsibility, deposit return scheme and Consistency in Household and Business Recycling consultations lack detail about how demand for plastic films will be driven with some also expressing uncertainty about the potential scalability of the end market.

Film quality and contamination

- Many respondents express concerns that films may be contaminated with food residue and may cross-contaminate the paper stream, which could increase sorting costs and decrease material quality.

Contracting and finance

- Many respondents express concerns about increased gate fees and the costs of updating vehicles, contracts, and infrastructure, which implementing the proposals may require.
- Some respondents express concerns that the proposed introduction date may mean local authorities have to make changes to their collections mid-contract, which may be expensive.
- Some respondents express concerns that existing materials recovery facility

contracts may not include the sorting of films.

Consumer understanding and compliance

- Some respondents express concerns that householders may not clean films and flexibles before presenting them for collection, which may cause issues for sorting and reprocessing infrastructure.
- A few respondents express concerns that communications about films and flexibles to householders that leads to the appropriate behaviours may be difficult to deliver.

Sorting and reprocessing infrastructure

- Many respondents express concerns that current collection, sorting, and reprocessing infrastructure may be inadequate for implementing the proposals and believe investment and upgrades may be needed.
- Many respondents express concerns that if local authorities collect more film than can be reprocessed, large quantities may be exported, potentially reducing overall public trust in recycling.

Impacts of separate collection

Some respondents express concerns that plastic films collected at kerbside may escape from containers and result in more litter, and that additional collections may require more vehicles and result in higher carbon emissions.

Relationship with Extended Producer Responsibility

- Many respondents express concerns about the relationship between Extended Producer Responsibility and the proposals, including inconsistencies in timelines. Respondents suggest that any costs associated with the proposals, including increased gate fees, should be covered by Extended Producer Responsibility, and that films collections should only occur once the Extended Producer Responsibility Scheme Administrator is in place.
- Some other respondents believe that Extended Producer Responsibility may disincentivise the use of plastic films, potentially decreasing the need for their collection.
- A few respondents express concerns that films currently collected by local authorities may not all be recycled, which may result in lower Extended Producer Responsibility payments to authorities.

Some respondents express concerns about a perceived lack of detail in the proposal regarding the following: the definition of 'films and flexibles'; evidence that the timeline is realistic; the environmental benefits of the proposals; and whether films will be collected separately.

A few respondents oppose the collection of plastic films and believe that compostable packaging should replace plastic over time.

Suggestions

In-store collections

A few respondents suggest prioritising in-store take-back services for plastic films, which has the potential to:

- serve as a useful test of whether the public are able to recycle the correct types of plastic films without contaminating them;
- pass on the difficulties of recycling films to the packaging chain; and
- start to expand end markets and sorting capacity, while providing an indication of likely contamination levels.

A few respondents suggest that local authorities should be allowed to decide when and how they collect plastic films, including if they collect films separately or with other materials.

A few respondents suggest that non-recyclable plastic films should be banned or that all plastic films should be disincentivised, in favour of more environmentally friendly options.

Some respondents suggest that end markets may require further development before the proposals are put into place.

Some respondents emphasise that communications need to be clear and consistent.

Many respondents express concerns that, if the sorting capability is not available in the UK, this would result in films and flexibles having to be collected separately from other materials. As this would be an additional collection, the 2026/7 timeline may become unrealistic, due in part to implications for vehicle design and transfer station operations.

Some respondents express concerns about a recent amendment to the Environment Bill proposed by Baroness Bakewell or Hardington Mandeville, which suggests that local authorities should collect compostable flexible materials alongside food and garden waste. Respondents are concerned that this amendment could lead to contamination of the organics waste stream. They are further concerned that this could make it impossible for local authorities to meet the revised contamination limits noted in the Environment Agency Standard Rules Consultation No.20. Respondents are also concerned that this amendment appears to directly contradict statements made in the Extended Producer Responsibility consultation (1.31, P11). On this basis, respondents go on to suggest that Government reject this amendment.

5.2. Question 12

5.2.1. Which of the following reasons might prevent plastic film collections being offered to all households by the end of the financial year 2026/27? (Multi select)

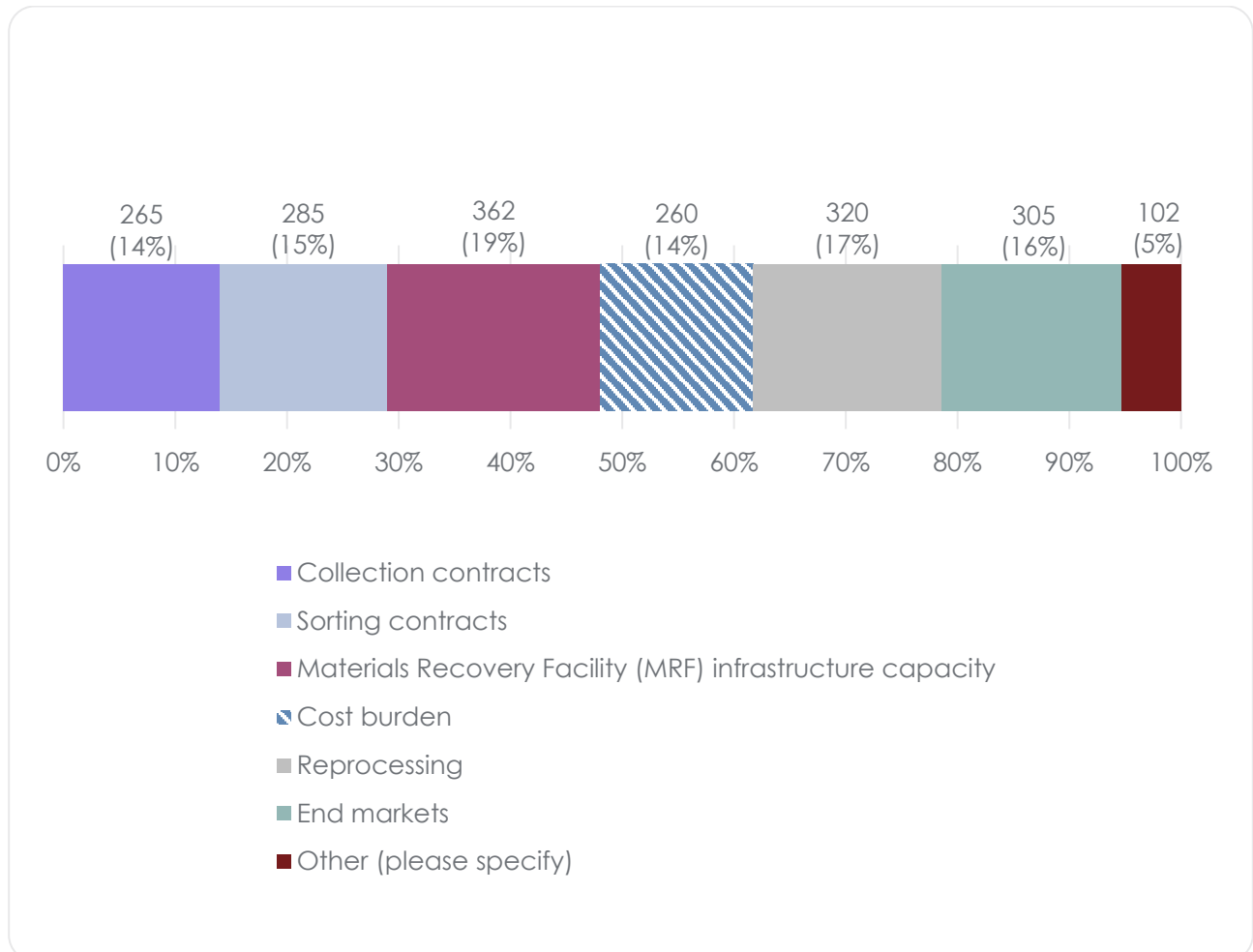


Figure 11 Question 12, (n=524)

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

This question was answered by 435 respondents. Their comments are summarised below.

This section also summarises comments from participants in response to the option “Other (please specify)” in question 12 (above). 100 respondents offered comments in response to this question. These two parts of the question are summarised together because of the overlap in the answers given to each question.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a

- percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Reasons to delay (concerns) End market insufficient / not ready	16%	3%	42%	0%	3%	31%
Reasons to delay (concerns) MRFs - lack of capability / sorting problems / not ready	15%	3%	40%	2%	0%	14%
Reasons to delay (concerns) Inadequate infrastructure/facilities	14%	4%	36%	2%	6%	14%
Don't delay ASAP / no excuse for delays / get on with it / don't delay	9%	8%	1%	37%	35%	6%
Suggestions Greater producer responsibility / relationship with EPR	7%	4%	13%	14%	13%	14%

Positive comments

Some respondents express support for film collections, as they may increase recycling rates and divert plastic waste from landfill.

Concerns – reasons to delay

Some respondents suggest that all of the reasons listed in Question 12 may prevent plastic films collections being offered to all households by the proposed date.

Many respondents express concerns that existing UK end markets for films may be insufficient and believe that, unless they are developed, some film that is collected may not be recycled.

Some respondents express concerns that plastic films may be difficult to sort and reprocess. For example, films may snag on machinery and specific types such as polypropylene cannot currently be recycled.

A few respondents express concerns that collecting films from flats and houses of multiple occupation may be difficult due to space constraints and shared facilities.

Many respondents express concerns that existing collection and sorting contracts may extend beyond the proposed start date, and any changes to contracts may be difficult and costly.

Many respondents, express concerns about potentially limited vehicle and transfer station capacity, the cost burden of additional vehicles, and carbon emissions from additional collection journeys. Some believe that vehicle supply might not be able to meet demand

if all local authorities start ordering new vehicles at the same time.

Many respondents express concerns about potential increases to gate fees, upfront investments and the costs of collections, sorting, staffing, reprocessing and communications. Some respondents believe that new burdens funding should be available to cover these costs and that changes to contracts may be covered by Change in Law provisions.

Some respondents express concerns that householders may find sorting plastic waste into different containers time-consuming and difficult. For example, they may leave films attached to containers.

Insufficient sorting and reprocessing infrastructure

- Many respondents express concerns that the greatest barriers to the proposals may be insufficient sorting and reprocessing infrastructure.
- Many respondents express concerns that existing materials recovery facilities may require significant upgrades to be able to sort plastic films. Others believe that expensive manual sorting may be required.
- Some respondents express concerns that UK reprocessors may not have the capacity to deal with nationwide films collections, so films may be exported or sent to landfill.

Other concerns

Differing implementation dates for households and businesses

Some respondents express concerns that different start dates are proposed for collections from households and businesses. Respondents do not think an earlier deadline for businesses would be possible and believe that a single date may make collections more efficient.

Some respondents express concerns about a perceived lack of detail in the proposal regarding: the predicted costs of implementation; the capability at materials recovery facilities; whether collections from SMEs will be delayed; and if films from SMEs will be collected in a separate stream.

Some respondents express concerns that the quantity of plastic film potentially captured by the proposals may be too small to outweigh the costs of implementation.

Some respondents express concerns that public support and participation may be crucial to the proposals and believe that communications campaigns should start early and receive sufficient funding.

Some respondents express concerns that separate film collections from smaller businesses by 2024/25 may be challenging, as SMEs may have little storage space and produce small quantities of waste.

Some respondents express concerns that plastic films may be contaminated with food residue if householders fail to clean them. Some respondents believe that opaque sacks may hide contamination and should be excluded from collections.

Some respondents express concerns that a new collection stream may require additional containers that may take up space and be seen as impractical.

Suggestions

Many respondents suggest that Extended Producer Responsibility funding should cover investments in recycling infrastructure and the cost burden of collections for local authorities. Others believe the start of films collections should align with the Extended Producer Responsibility timeline.

Many respondents suggest that films collections should not be delayed and should start as soon as possible.

Many respondents suggest that Government should focus on finding solutions to problems, instead of treating them as obstacles that cannot be overcome.

A few respondents suggest that local authorities should not be given a reason to delay implementing proposals because businesses were not given a reason to delay Extended Producer Responsibility implementation.

A few respondents suggest that the 'Reprocessing' and 'End markets' options in the question may not be applicable to individual local authorities.

A few respondents suggest that the potential challenges associated with the proposals need to be better understood before the proposed start date.

A few respondents suggest that plastic films should be phased out and replaced with compostable films.

A few respondents suggest that in-store takeback schemes for films may help develop end markets and recycling infrastructure.

Some respondents suggest that Government should support local authorities in meeting the proposed implementation date, instead of postponing the date.

6. Proposal 3: Definition of food waste

6.1. Question 13

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

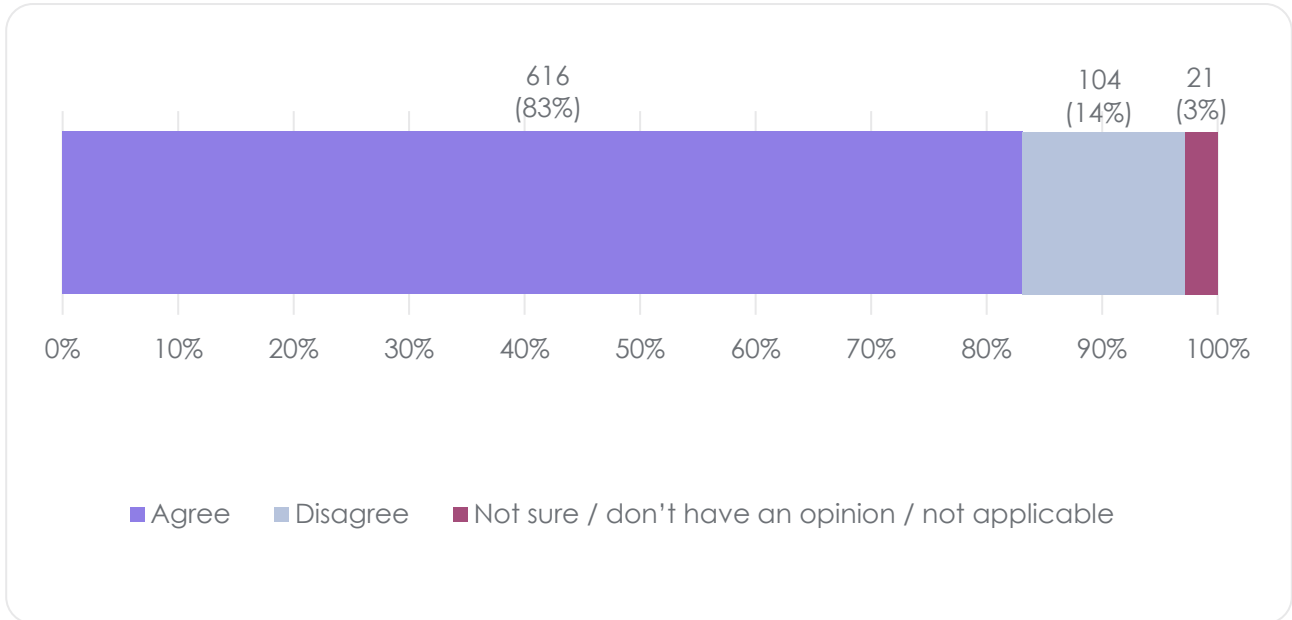


Figure 12 Question 13, (n=741)

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

This question was answered by 326 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Inclusion of specific materials Tea bags	13%	4%	22%	18%	10%	28%
Suggestions Need clear guidance for householders about what can be collected	9%	0%	25%	0%	10%	3%

Suggestions Ban plastic in tea bags / promote compostable tea bags	9%	3%	14%	24%	3%	11%
Support General support	8%	2%	19%	4%	10%	3%
Concerns List of what can be included not comprehensive enough	5%	1%	11%	18%	6%	6%

Support

Many respondents express general support for the proposed definition of materials to be collected for recycling within the food waste stream, as many of local authorities already collect a separate food waste stream.

A few respondents express support for the inclusion of tea bags in food waste collection because of the high number of teabags used in the UK every day and they wish to see these being diverted from landfill.

A few respondents express general support for the proposal of a separate food waste stream as a step towards reducing the overall amount of residual waste.

Some respondents express support for a food waste collection because of the potential positive impact of reducing 87% of greenhouse gas emissions, as waste is driven away from landfill.

Concerns

Concerns about the definition

Many respondents express concerns that the proposed list is not comprehensive or is too vague. They also suggest a number of materials for consideration. These include pet food; semi liquid foods like soup; animal and fish bones; uncooked food waste; vegetable peel; windfall fruits; bones/eggshells; cooked and uncooked food; windfall fruits; as well as banana skins. Some respondents express concerns with some of the terms used in the definitions provided in the proposal, in particular 'food scraps' and 'consumed by humans'. Respondents feel the former is misleading and could be interpreted differently by residents. Whilst respondents feel the latter does not account for products such as pet food, noting that some authorities already include pet food in their food waste recycling.

Some respondents also express concerns for the inclusion of bones/eggshells as they are generally not "consumed by humans" but their status under this definition is unclear.

Other

Many respondents express general concern for potential microplastics components in tea bags that could negatively affect Anaerobic Digestion plants during processing.

Some respondents express concerns about the financial implications created by an additional food waste stream. Many respondents suggest Government will need to provide new burdens funding to cover these costs.

Some respondents express general concerns that certain materials could impact anaerobic digestion systems ability to process food waste. For example: decomposing

food waste; fruit labels; microplastics in teabags; and coffee filters.

Some respondents express concerns that residents will not want to participate in a separate food waste collection for a number of reasons. These include lack of space to store a food caddy; smell of moulding food; as well as general messiness of having to separate food waste.

Some respondents express concerns for the inclusion of liquids in food waste streams because of the risk of spillage and resulting hygiene impacts for staff.

A few respondents express concerns about a separate food waste collection, commenting that their experience had suggested only a minimal decrease in carbon emissions despite a significant annual revenue cost.

A few respondents express concerns for the inclusion of coffee grounds as they can be considered a contaminant in the anaerobic process due to hindering bacterial fermentation.

A few other respondents express concerns that non-compostable coffee pods and bags may inadvertently also be included in the food waste stream and therefore contaminate it.

A few respondents express concerns that a separate food waste stream could attract pests and be generally messy on roads when being collected.

A few respondents express concerns that the proposal could negatively impact existing contracts as the removal of food waste from the residual waste stream could affect minimum tonnage requirements set out in some long term contracts.

A few respondents express general concerns for contamination of food waste streams and the impact of this on recycling quality. Materials mentioned include coffee filter papers, fruit labels, metal staples and microplastics.

A few respondents express concerns for the availability of specialist vehicles to accommodate food waste collections. In addition, a few respondents express concerns over a national shortage of HGV drivers in the UK.

A few respondents express concerns for challenges faced specifically by flats and houses of multiple occupation. For example: lack of space for extra bins; effective communication to engage residents; as well as risk of contamination between bins.

A few respondents express concerns for the potential increase in carbon emissions as a result of more collection vehicles on the road to accommodate a separate food waste stream.

A few respondents express concerns for the provision of caddies and liners to residents because of the cost related to this.

A few respondents express concerns that a separate food waste stream is not required as food waste would likely break down quickly in landfill anyway.

Suggestions

Suggestions about the definition

Many respondents suggest that the guidance should be more clearly defined when

communicated to residents to ensure the success of a separate food waste stream. Many respondents suggest using terms the public are already familiar with, such as, meat, dairy, and vegetable peelings to avoid confusion.

Additions

- Some respondents suggest that compostable coffee pods, bags and filters should be included under the definition in the proposal.
- Some respondents suggest that all identifiable certified compostable packaging should be included under the proposal.
- Some respondents suggest that pet food should be included under the new food waste proposal as it is in effect very similar to human waste food leftovers but would not fall under the current proposed definition of 'consumed by humans'.

Other suggestions

Many respondents suggest that teabags containing plastic should be banned and in turn Government mandate the use of compostable teabags for all tea producers in the UK.

Some respondents suggest that where possible residents should be encouraged to use any food waste for composting or feeding to animals such as birds to reduce waste overall. A few respondents also suggest that there should be a focus on preventing food waste rather than recycling and that biodegradable items where possible should be diverted from contaminating the general waste stream.

Some respondents suggest that local authorities should have the power to make decisions on collection frequency as they feel that lower frequency collections could potentially yield better recycling rates.

Some respondents suggest that local authorities should be encouraged to provide a recycling route for waste cooking oil alongside food waste.

Some respondents suggest that Government ban the use of non-compostable fruit labels as, currently, fruit labels often contaminate food waste.

Some respondents, citing examples from existing major retailers, suggest that all retailers be required to provide only carrier bags that are certified compostable, and that these be allowed in the food waste stream.

Some respondents suggest further research into certain areas is needed to clarify the proposal. These include: the status of unpackaged food waste; a review of tests on biodegradability; and consideration of other uses of food waste, such as renewable energy.

A few respondents suggest that new burdens funding should cover any necessary costs related to the introduction of a separate waste collection.

A few respondents suggest that waste hierarchy should be applied to help to minimise food waste wherever possible, rather than just creating a separate waste stream.

7. Proposal 4: Separate collection of food waste from households for recycling

7.1. Question 14

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

7.1.2. Local authorities already collecting food waste separately must continue to collect this material for recycling at least weekly from the 2023/24 financial year

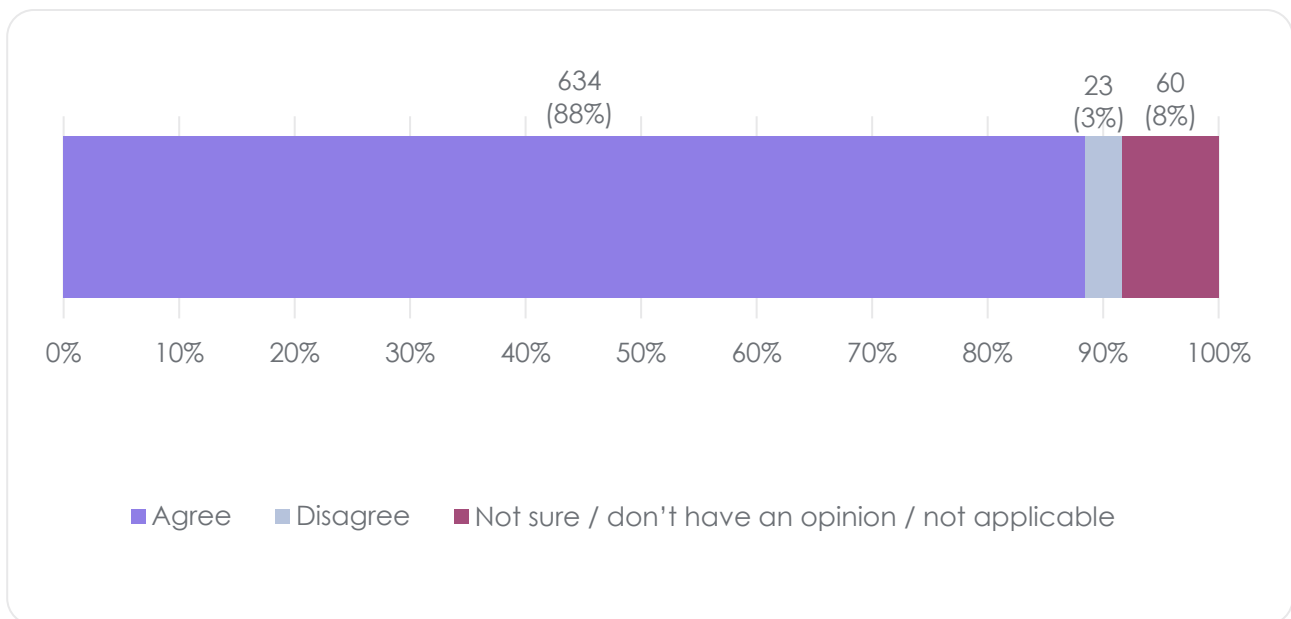


Figure 13 Question 14, (n=717)

7.1.3. Local authorities should have a separate food waste collection service (at least weekly) in place for all household properties including flats as quickly as contracts allow

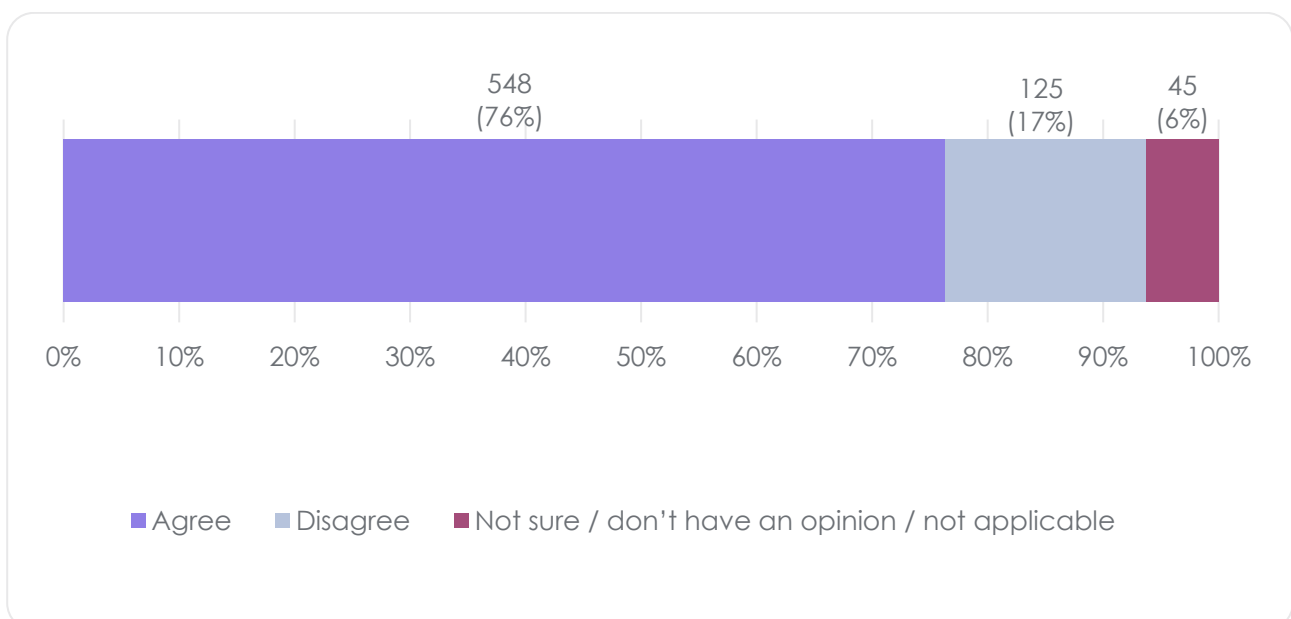


Figure 14 Question 14, (n=718)

7.1.4. Local authorities without existing contracts in place that would be affected by introducing a separate food waste collection service should have a separate food waste collection service in place (at least weekly), for all households including flats, by the 2024/25 financial year at the latest

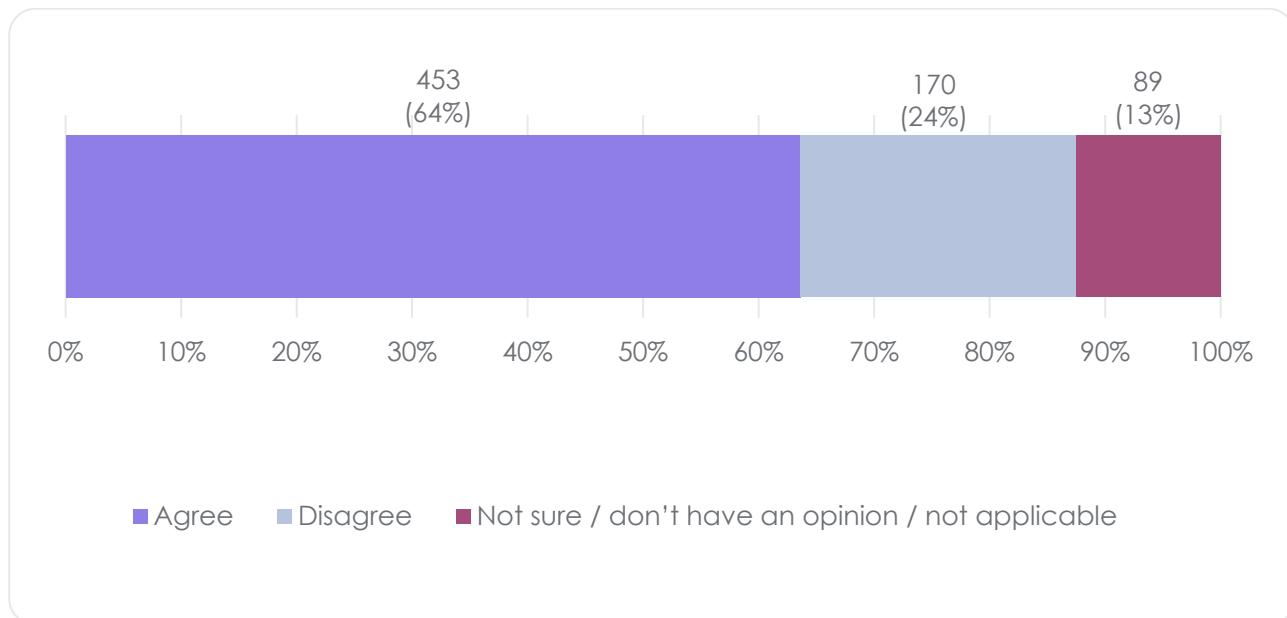


Figure 15 Question 14, (n=712)

7.1.5. Local authorities with long term existing mixed food/garden waste collection or disposal contracts in place should have a separate food waste collection service in place (at least weekly) for all household properties including flats as soon as soon as contracts allow, with an end date to meet this requirement between 2024/25 and 2030/31

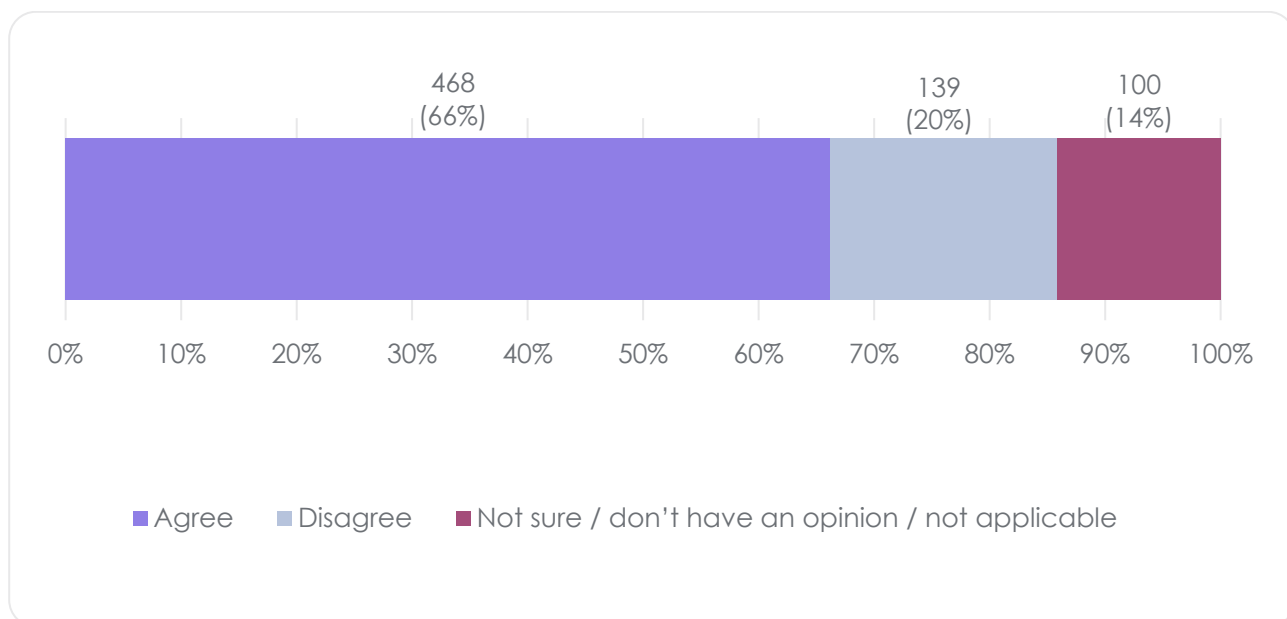


Figure 16 Question 14, (n=707)

7.1.6. Local authorities with long term residual waste disposal contracts affected by introducing a separate food waste collection service (e.g. some Energy from Waste or Mechanical Biological Treatment contracts) should introduce

a separate food waste collection service (at least weekly) to all households including flats as soon as contracts allow, with an end date to meet this requirement to be set between 2024/25 and 2030/31

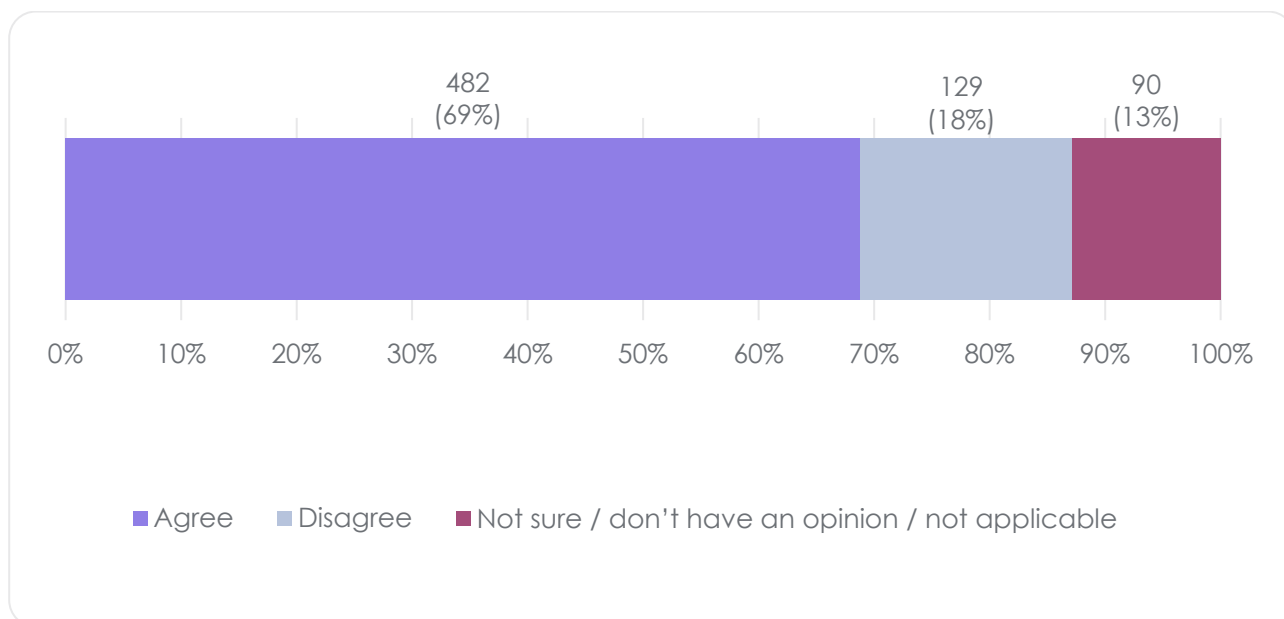


Figure 17 Question 14, (n=701)

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

This question was answered by 392 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support General support	16%	5%	30%	22%	19%	22%
Concerns Financial cost	15%	2%	38%	14%	6%	17%
Concerns Inadequate infrastructure	14%	0%	42%	0%	0%	14%
Concerns Contracts	13%	1%	37%	4%	0%	14%
Concerns Challenges posed by flats and HMOs	12%	0%	38%	0%	0%	3%

Support

Many respondents express general support for the suggested implementation of weekly separate food waste collections by the suggested deadlines, noting this could contribute to significant 'carbon savings' and ultimately achieving net zero. Some respondents also note that the organic waste produced may be a valuable resource in improving the condition of UK soil. Some respondents express support for mandated collection of food waste by local authorities, though go on to say that this should be part of reducing food waste in the first place, following the targets proposed by the Bio-based and Biodegradable Industries Association (BBIA).

Some respondents express support for weekly separate food waste collections, suggesting this collection frequency could be 'vital' in avoiding issues – such as bad smells – which could 'limit public enthusiasm' for food waste recycling.

Some respondents express support for increased separate food waste collection as a means to avoid food waste being collected and sent to landfill with residual waste or incinerated, which they perceive to be environmentally detrimental.

Concerns

Concerns about the deadlines

Many respondents express concerns that meeting the deadlines suggested could be very difficult and costly for local authorities already locked into long-term waste collection contracts. Some respondents suggest changes in collection frequency should not be required until contracts end, or financial support should be provided to authorities renegotiating or terminating contracts.

Some respondents express concerns that the infrastructure changes required to implement an effective weekly food waste collection make the deadlines an 'unrealistic target' for many local authorities, particularly those not currently collecting food waste.

Some respondents express concerns that the deadline is set too far into the future and does not incentivise local authorities to take immediate action.

Some respondents express concerns that a rush to meet deadlines could prevent new systems being carefully considered and properly implemented. Other respondents question the necessity of weekly separate food waste collection, believing there to be only a 'small carbon benefit'.

Other concerns

Many respondents express concerns regarding the costs associated with increasing separate food waste collection, including additional vehicles and staff. Respondents also question the level and availability of funding, which they believe is unclear, and suggest that many local authorities may require significant financial support.

Many respondents express concerns that the necessary infrastructure to effectively collect and process food waste may not be available by the deadline suggested for weekly food waste collection.

Many respondents express concerns that it would be particularly difficult to introduce separate food waste collection for certain properties – particularly flats and houses of

multiple occupation – due to a lack of storage space and other 'logistical constraints'. Respondents suggest it would take longer to successfully implement separated food waste collection for such properties and require significant investment.

Some respondents express concerns over details of the introduction of weekly food waste collection which they feel are missing. Examples include:

- funding, particularly new burdens funding;
- specific deadline date;
- definition of 'food waste'; and
- types of contracts affected.

Some respondents express concerns that the potential positive environmental impact of increased food waste collection may not outweigh the increase in carbon emissions created by additional collection vehicles. They suggest that collection vehicles powered by alternative fuels (e.g. biogas or electricity) would be the best way to 'maximise carbon benefits'.

Some respondents express concerns that providing weekly food waste collections would require a significant increase in appropriately trained staff, which may pose a challenge considering existing recruitment difficulties.

Some respondents express concerns that separating food and residual waste would alter the composition of residual waste, potentially making it more difficult and expensive to dispose of.

Some respondents express concerns that separate food waste collection would require additional containers, which many do not have space to store. They also note that separating waste into numerous streams is labour intensive for households and may discourage recycling.

Some respondents express concerns that mandatory separated food waste collection may not be the most appropriate option for all areas, and local authorities should have the option to collect co-mingled food and garden waste.

A few respondents express concerns regarding the 'public health issue' of the storage and kerbside collection of food waste, specifically mentioning smell, unsightliness, and an increased risk of vermin.

A few respondents express concerns that the requirement for 'at least weekly' food waste collection is unnecessarily inflexible and suggest local authorities should be able to decide an appropriate collection frequency depending on the needs and circumstances of the local area.

A few respondents express concerns that there is already a high level of contamination in the food waste stream, for reasons such as householder confusion and the use of caddy liners. Respondents indicate that this issue should be resolved as a greater priority than increasing food waste collections.

Suggestions

Some respondents express concern that the consultation fails to consider the potentially negative impact of mandatory weekly food waste collections on existing in-vessel

composting facilities, suggesting their turnover could diminish and they may be forced into closure. Respondents also note that in-vessel composting facilities are necessary to manage compostable disposables commonly used in catering, particularly during the Covid-19 pandemic, and suggest they should therefore be preserved.

Some respondents suggest that there are many successful examples throughout the UK of local authorities collecting co-mingled food and garden waste. They note that this approach could be efficient and environmentally effective and supports Government's overall policy of diverting food from residual waste. Respondents therefore suggest local authorities should be able to continue – or start – providing co-mingled food and garden waste collection.

Some respondents suggest that performance targets for food waste collection should be set for local authorities, suggesting such targets would incentivise effective and environmentally impactful collection and processing. Respondents note, however, that targets should not inadvertently encourage the production of food waste, so suggest the optimal metric to be the volume of food waste in residual bins. Respondents propose an initial target of 'less than 50% of food waste in the residual bin 2 years after the implementation of collections'.

Some respondents suggest that the use of mechanical biological treatment facilities should not be considered reason for local authorities to delay the implementation of weekly food waste collections. They suggest that while such facilities may remain a valuable tool for processing residual waste, food waste should be collected and processed separately.

Some respondents suggest that if weekly food waste collection is to be introduced, vented kitchen caddies – to be used in conjunction with caddie liners – should be issued to householders to collect food waste. They suggest that the venting reduces condensation – and therefore mould and odour – making them more pleasant to use, whilst the water vapour loss reduces the water being transported and processed as part of food waste, and thus reduces emissions. Respondents note that such food waste caddies have performed well in UK pilots, and are already popular in France, Italy, and Spain.

Some respondents suggest that deadlines should not limit local authorities' ability to adequately consider how best to deliver waste collection services.

Some respondents suggest that local authorities best understand the feasibility and impact of weekly food waste collections in their area and should therefore have the 'autonomy to decide' the most appropriate collection system.

Some respondents suggest further research needs to be conducted into the feasibility of weekly food waste collection. Suggested areas for research include:

- food waste participation rates;
- 'technical and economic practicalities';
- benefit of food waste collection in rural areas; and
- impact on residual waste stream.

Some respondents suggest that in order to 'cut emissions' food waste should be collected and directed to anaerobic digestion 'as soon as possible', with a deadline of 2023/24 for

local authorities needing to terminate or renegotiate contracts. They also suggest this would stimulate the development of additional anaerobic digestion plants, which will be needed.

Some respondents suggest that communication and education from local authorities could be vital in encouraging householders to engage with and support separate food waste collection. They also note that specific practical support should be given to residents and landlords of flats and houses of multiple occupation.

Some respondents suggest that supporting a 'drastic' reduction in food waste should be prioritised over increased food waste collection.

A few respondents suggest that encouraging waste prevention and home composting should be prioritised, especially in rural and remote areas where these options may be 'more effective'.

A few respondents suggest that food waste collection will always be necessary for properties such as flats where home composting is not possible. However, due to the specific logistical challenges of food waste separation, storage, and collection from these properties, respondents suggest they are subject to a separate or delayed weekly collection deadline.

A few respondents suggest that local authorities should be able to introduce weekly separate food waste collection by 2024/25 'at the latest'. Respondents note this deadline should be particularly achievable for local authorities already collecting food waste. Respondents also suggest that clearly defined deadlines mean industry and supply chains will adapt accordingly.

7.2. Question 15

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

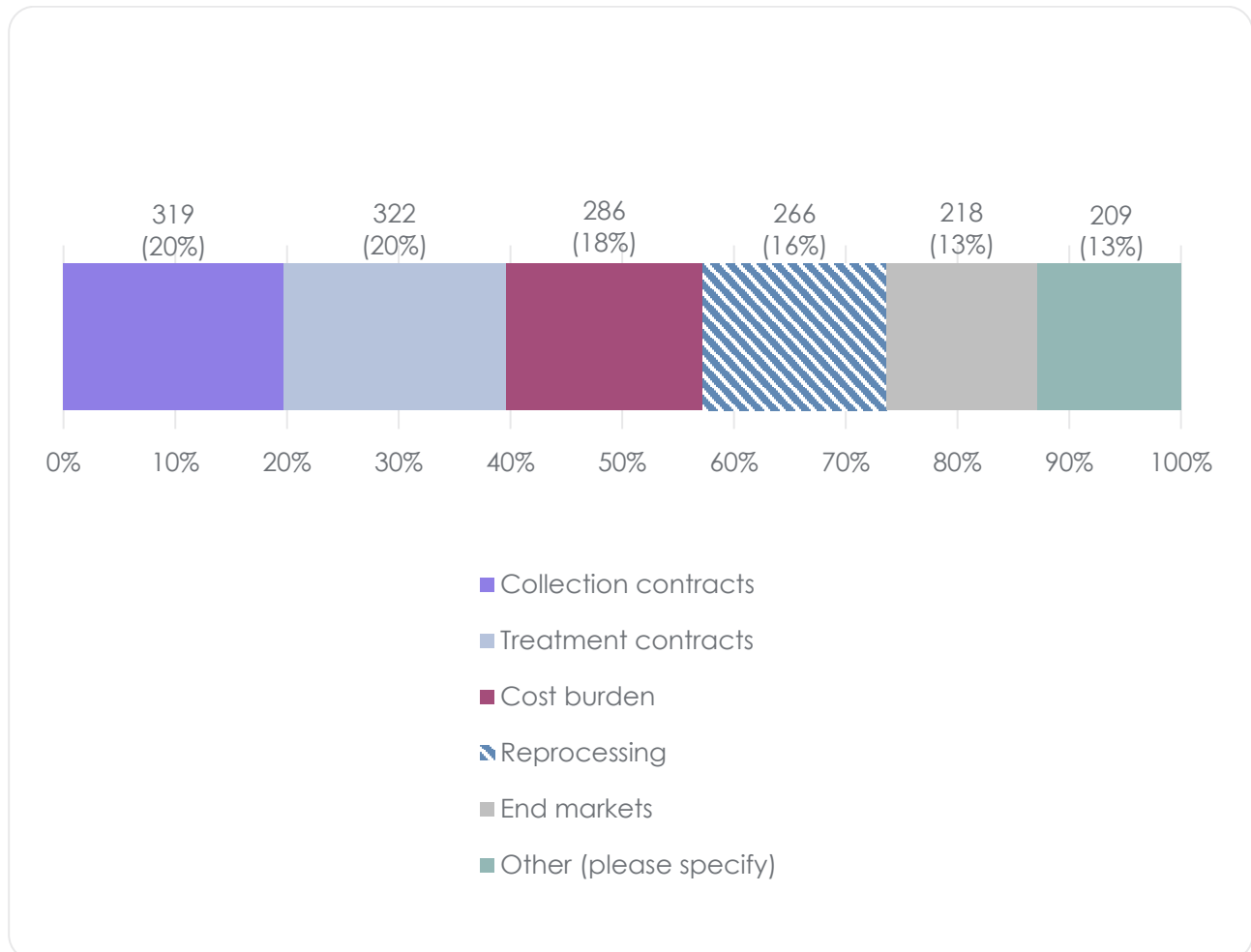


Figure 18 Question 15, (n=518)

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

This question was answered by 330 respondents. Their comments are summarised below.

This section also summarises comments from participants in response to the option "Other (please specify)" in question 15 (above). 211 respondents offered comments in response to this question. These two parts of the question are summarised together because of the overlap in the answers given to each question.

The table below lists the codes most commonly applied to all responses to the open

question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Challenges posed by flats and HMOs	18%	1%	54%	16%	3%	14%
Concerns Inadequate infrastructure	18%	2%	52%	16%	3%	11%
Concerns Contracts	14%	2%	37%	16%	3%	17%
Concerns Financial cost to local authorities	14%	1%	43%	2%	0%	8%
Suggestions Timescale No reasons to delay	9%	9%	1%	43%	19%	6%

Positive comments

Many respondents express general support for mandatory weekly food waste collections within the proposal's timelines, suggesting this will help to increase recycling rates, have a positive environmental impact, and contribute to achieving a circular economy. Some respondents explain their support by noting that the 2020 Composting Industry Market Survey Report suggests capacity is available to process an increase in collected food waste, whilst others reference existing efforts to establish adequate end markets.

A few respondents express support for weekly food waste collections, provided that Government fully funds the implementation of such services from central tax, rather than council tax.

A few respondents express support for the proposed implementation deadlines for weekly food waste collection. They suggest that these deadlines are achievable, whilst providing local authorities reasonable time to make any necessary changes.

Concerns

Many respondents express concern that it may be very difficult to implement weekly food waste collection for flats – particularly above shops – and mixed-occupancy housing, due to logistical constraints and a lack of space to store containers in such properties. Some respondents suggest that designing bespoke solutions for such properties could be laborious and costly as each block of flats is unique, whilst other respondents suggest failing to offer weekly food waste collection to certain properties is inequitable, and tantamount to discrimination.

Many respondents express concern that many areas may lack sufficient anaerobic

digestion capacity to meet the volume of food waste created by mandatory weekly food collections. Respondents also note that many local authorities currently lack the collection vehicles, operational staff, depot space, and transfer station capacity necessary to operate weekly food waste collections. Respondents suggest such infrastructure challenges could make it extremely difficult for local authorities to introduce weekly food waste collection by the proposed deadlines.

Many respondents express concern that local authorities may lack the money, depot space, and qualified drivers required to buy and operate the additional collection vehicles needed for weekly food waste collections. They also note that buying new vehicles, reconfiguring depots, and hiring new drivers could take a significant amount of time, making it unfeasible for some local authorities to meet the deadlines suggested in the proposal.

Many respondents express concern that implementing weekly food collections could be extremely costly for local authorities, noting the cost of contract renegotiations or terminations, new collection vehicles and drivers, and depot expansion. They also note weekly food waste collections may be financially less efficient for some local authorities, such as those operating collections in rural areas.

Many respondents express concern that the deadlines outlined in the proposal may not allow local authorities the time needed to effectively implement a weekly food waste collection service, suggesting the time needed to make infrastructure adaptations could be significant. Consequently, respondents feel the deadlines proposed may not be achievable for many.

Many respondents express concern regarding important details which they believe are lacking from the proposal. They believe more information is necessary in areas such as:

- cost estimates, which respondents feel are inaccurate;
- definition of 'food waste recycling';
- definition of 'flats';
- impact on the Environmental Protection Act;
- relationship with Extended Producer Responsibility and associated funding; and
- definition, scope, and duration of Government new burdens funding.

A few respondents express concern that in a bid to meet the proposed implementation deadlines, many local authorities may attempt to procure the same resources – such as collection vehicles and containers – and implement the same infrastructure changes at the same time. They suggest this could cause a supply chain bottleneck, and therefore severe delays in the ability to introduce weekly food waste collections.

A few respondents express concern that the actual implementation, operational, and processing costs of weekly food waste collections will exceed the Government funding available. Some respondents express concern regarding the possibility of current subsidies for anaerobic digestion facilities ceasing, whilst others express concern that Government funding to support the introduction of weekly food waste collections may not be available on an on-going basis or may be 'offset' by cuts in funding in other areas.

Many respondents express concern that there may not be sufficient end markets for the increased volume of digestate and organic materials produced should weekly food waste

collections become mandatory. Respondents also question whether the UK 'land bank' is large enough to accommodate a potentially significant increase in anaerobic digestion output.

Some respondents express concern regarding the staffing implications of introducing weekly food waste collections. They note that it may be difficult to recruit and train appropriate staff, expressing particular concern regarding collection vehicle drivers considering the existing national driver shortage.

Some respondents express concern regarding the feasibility of introducing weekly food waste collections in rural areas by the proposed deadline, noting that new collection vehicles suitable for narrow country roads may need to be procured, possibly by many local authorities at the same time. Respondents also suggest that the often-sparse population distribution of rural areas may make food waste collection less environmentally and economically viable, due to the limited waste collected and longer journey times.

A few respondents express concern that compulsory weekly food waste collections will necessitate additional collection vehicles and journeys, and therefore increase carbon emissions. Some respondents suggest that in rural areas in particular, the possible environmental benefits of collecting food waste do not outweigh the carbon emissions produced by collection vehicles.

A few respondents express concern regarding the environmental benefit of food waste collection and recycling. They suggest that this has limited positive impact when compared to other recyclables such as glass, particularly in the context of increased collection vehicle emissions.

A few respondents express concern that food waste is only valuable for processing into digestate and compost when there is a low level of contamination, particularly plastic contamination. Respondents note that opt-in food waste collection generally produces quality food waste, but express concern that compulsory food waste may be more susceptible to contamination from householders not familiar with the system.

A few respondents express concern that the introduction of weekly food waste collection may incur significant additional costs to local authorities which may be passed on to the taxpayer.

A few respondents express concern that food waste containers left out for collection could cause an obstruction or even trip-hazard for pedestrians and attract animals such as foxes. They also note that the repeated lifting of such containers, along with possible exposure to bioaerosols from food waste, may be a health and safety concern for collection operatives,

A few respondents express concerns about a potentially uneven playing field between businesses and local authorities if the latter are allowed a delay in their implementation of Consistency in Household and Business Recycling proposals due to any reasons suggested in the question which were not offered to businesses in the Extended Producer Responsibility consultation. They also suggest that the successful implementation of both schemes requires timings to be aligned and are concerned that this is not the case.

A few respondents express concern that separating food and residual waste could

negatively impact the calorific value of the latter, potentially jeopardising existing contracts with energy recovery facilities. Respondents also express concern that increased waste collection may result in reduced residual waste collection, which may be inconvenient, and note that some householders may not want to separate and store food waste.

A few respondents express concern that separate food waste collections will require householders to use and store an additional recycling bin, which they may not have space to do. They also express concern that these additional bins may negatively impact the street scene, particularly in urban areas and areas where properties have little or no frontage.

Suggestions

Suggestions about deadlines

Many respondents express concern that many local authorities are already committed to collection and processing contracts, some of which may extend beyond the proposal's deadlines. Respondents note that renegotiating – or even terminating – such contracts could be complex, slow, and costly, and suggest a more practical approach would be to implement mandatory weekly food waste collections once existing contracts have expired.

Some respondents believe that weekly food waste collections should be implemented as soon as possible, or as is operationally and environmentally practical. Some respondents suggest that earlier implementation deadlines would encourage industry investment, innovation, and diversification.

Some respondents suggest that weekly food waste collections should be introduced by as early as late 2021, whilst others suggest 2024/25 should be the latest implementation deadline. All these respondents agree that the final deadline should be considerably earlier than 2030/31.

Many respondents suggest that there should be as few exemptions to meeting the proposal's deadlines as possible, so as to meet recycling targets and maximise the amount of food waste being recycled. Some respondents suggest there should be no exemptions allowed at all considering what they perceive to be the urgency of the climate crisis, and that adequate Government funding and support should allow all local authorities to meet the proposed deadlines.

Some respondents suggest that certain circumstances – such as residential flats above shops – may make weekly food collections logistically challenging, whilst others – such as existing collection contracts – may make it complicated and costly for local authorities to meet proposed deadlines. Respondents therefore suggest that it is practical to allow exemptions to the proposed deadlines, noting a 'one size fits all' approach may not allow for the differing circumstances of each local area.

Some respondents suggest that whilst there are legitimate challenges some local authorities may need to overcome in order to introduce weekly food waste collections, the focus should be placed on identifying effective solutions rather than treating them as reasons for delay.

Some respondents suggest that local authorities should be given the support needed to adequately meet the deadlines proposed, rather than opportunities to delay the implementation of weekly food waste collections via the exemptions listed.

A few respondents suggest that local authorities should have the ability to decide whether and when to introduce weekly food waste collections, based on the needs and circumstances of the local area. They also suggest that the focus should be creating the most environmentally beneficial outcomes possible in each area, rather than introducing a blanket policy.

Other suggestions

Many respondents suggest that Government should support the anaerobic digestion industry to develop and identify appropriate end markets for the increased volume of digestate and gas that may be produced from mandatory weekly food waste collection. They note that would be important for end-markets to be viable long-term and ensure gate fees remain manageable.

Some respondents suggest that the successful implementation of weekly food waste collection would require significant – and ongoing – communication and education for householders, so as to encourage engagement and avoid issues with contamination. They suggest that householder participation is vital for effective recycling to take place.

Some respondents suggest that Government should provide adequate, on-going funding to local authorities, which covers the full cost of introducing and operating weekly food waste collections, including contract renegotiations or terminations. They also suggest that such funding should be ring-fenced, so that it cannot be used to subsidise other services.

Some respondents suggest that further research should be conducted into the feasibility of weekly food waste collections from flats and communal properties, including pilots of possible communal collection points. Respondents also suggest that the modelling used as a basis of the proposal should be carefully re-examined.

Some respondents suggest that in accordance with the waste hierarchy food waste prevention – including education campaigns – should be prioritised over separate weekly food waste collections. Some respondents suggest that food waste collections may inadvertently create a misunderstanding, and householders may believe that creating food waste is inconsequential if it is recycled.

A few respondents suggest that Government should consider 'dry anaerobic digestion technology', which may allow food and garden waste to be collected and processed together. They suggest this may be more convenient for householders, financially and environmentally efficient in terms of minimising collection journeys and produce both biogas and compost.

A few respondents suggest that local authorities should have enforcement powers – such as penalties – to ensure that residents effectively participate in food waste recycling. They note such powers may be particularly useful in circumstances where landlords and/or letting agents prefer not to facilitate food waste recycling.

A few respondents suggest that local authorities should be financially penalised for failing to implement weekly food waste collection by the deadlines outlined in the proposal.

Another respondent suggested local authorities should be required by law to provide weekly food waste collections, and that new houses should – by law – have space to accommodate containers.

A few respondents suggest that waste prevention and home composting should be prioritised above weekly food waste collections, or at least promoted equally. These respondents believe the positive environmental impact of food waste prevention to be more significant.

A few respondents suggest that the potential carbon benefits of weekly food waste collection would only be maximised if collection vehicles ran on alternative fuels, giving the examples of electricity and biogas. They suggest that as the introduction of such collections may require many local authorities to procure new vehicles, investment should be made into developing vehicles using alternative fuels.

A few respondents suggest that in areas where dry recycling performance is currently poor, it would be more beneficial to focus on improvements in this area as a priority. They suggest that a food waste collection service may be unlikely to be effective if existing recycling services are under-performing.

A few respondents suggest that food waste collected should be processed via energy recovery.

8. Proposal 5: Caddy liners

8.1. Question 16

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

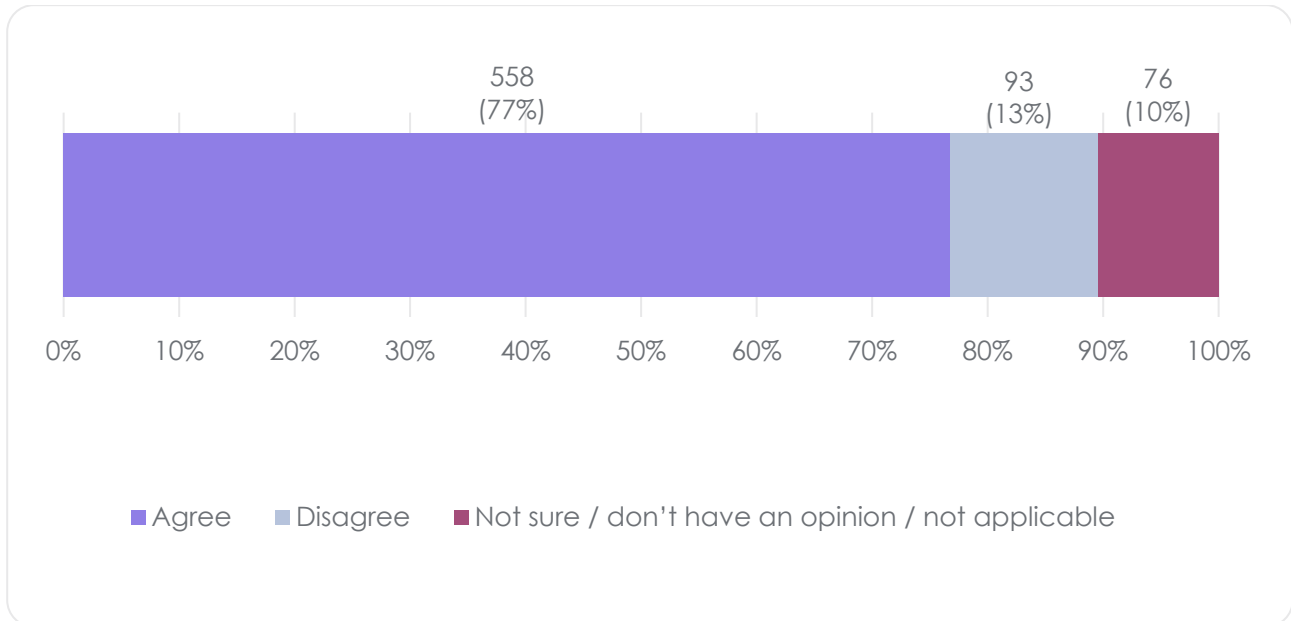


Figure 19 Question 16, (n=727)

8.1.2. Please provide any other comments on the use of caddy liners in separate food waste collections

This question was answered by 477 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Specific types of caddy liners Compostable / BS13432 / biodegradable caddy liners	15%	14%	4%	63%	16%	14%

Concerns Financial cost	14%	4%	32%	18%	3%	8%
Suggestions Funding	12%	3%	31%	16%	3%	8%
Support Increases participation	11%	1%	27%	14%	16%	14%
Support General support	8%	7%	9%	20%	13%	6%

Support

Many respondents express support for the inclusion of caddy liners, as they believe caddy liners help to increase participation and result in higher capture rates of food waste from households.

Many respondents express support for the inclusion of caddy liners as a clean, safe, and hygienic way for food waste streams to be collected, for both collection crews and households.

Many respondents express general support for the inclusion of caddy liners for the food waste stream. For example, that they support Government proposal, that caddy liners are required for a successful food waste collection service, that caddy liners make it easier for the householder, and that it will be good for the environment.

Many respondents, however, state that inclusion of caddy liners should be recommended in guidance as good practice rather than becoming compulsory. A few respondents base their support on the expectation that the increase in the capture rates of food waste works to offset the difficulties anaerobic digestion plants have with them in the treatment process.

Concerns

Many respondents express concerns about the financial cost associated with the purchase, provision, and ongoing distribution of caddy liners to residents, and respondents question who and where the funding for this could come from.

Many respondents express concerns about the current abilities of anaerobic digestion plants to differentiate between, and treat, different types of caddy liners. For example, respondents highlighted that different anaerobic digestion plants across the country have different capabilities, which affect their ability to accept and break down caddy liners in in-vessel composting.

Many respondents express concerns that the use of caddy liners would risk contaminating the food waste stream. Respondents question, for example, whether caddy liners used would meet the standard suitable for waste treatment facilities, or whether the public would use the correct type of caddy liner, which may otherwise contaminate the digestate and lead to the spread of microplastics.

Some respondents express concerns about the use of caddy liners for separate food waste collections. For example, respondents express concerns about the provision of caddy liners and how they might undermine the overall Consistency in Household and Business Recycling effort, complicate the scheme, or give off the wrong message about reducing plastic use.

Some respondents express concerns about the potential for household confusion around different types of caddy liners, and comment that this could result in a lack of willingness to engage or participate with the scheme.

Some respondents express general opposition to the inclusion of caddy liners within the food waste stream, commenting that caddy liners are unnecessary, given that local authority capture rates are already high without caddy liners, and that caddy liners compound the chances of problems occurring within the reprocessing process.

Some respondents express concerns that caddy liners represent another form of single-use waste which goes against the waste minimisation principle of the consultation. Some respondents view caddy liners as another waste item themselves, which risks contaminating the food waste stream.

A few respondents express concerns about difficulties that may arise for different types of housing stock from using caddy liners. For example, that greater consideration should be given to flats and small properties.

A few respondents express concerns that the use of caddy liners may result in inconsistencies across waste collection authorities, where some authorities might not have the provisions to provide caddy liners to residents.

A few respondents express concerns about the current lack of regulation around caddy liners which claim to be compostable or biodegradable, but do not break down in re-processing.

A few respondents express concerns about a perceived lack of detail within the proposal regarding the following: the type of caddy liner to be specified, funding to ensure the provision of caddy liners, the costs of purchasing and distribution, and the results of current reviews into anaerobic digestion permit rules.

A few respondents express general concern, and opposition, to the use of plastic bags as caddy liners.

Suggestions

Respondents make suggestions about specific types of caddy liners that should be used

- Many respondents specifically suggest that caddy liners should be compostable or biodegradable. Some respondents suggest that caddy liners should be compliant with BS1342 standard; compostable after 12 weeks and biodegradable after 6 months.
- Many respondents make varied suggestions about other types of caddy liner for food waste collections, including the following: coloured liners, ethical and organic liners, fibre based liners, starch liners, paper or newspaper, or the most environmentally friendly/ lowest total carbon emission solution.
- Some respondents suggest that plastic liners or plastic bags can be used for food waste collection as, they are easier to remove at reprocessing, cheaper than compostable liners, are less likely to split, and are easily accessible for the public.
- Some respondents suggest that there should be a clear specification or standard material for caddy liners. Some respondents suggest this should be discussed agreed with anaerobic digestion plants.

Many respondents make varied suggestions about how caddy liners should be funded. For example, that they should be funded through and be, or at low cost, to households.

Many respondents suggest that further research and a cost-benefit analysis for the use caddy liners is needed to ensure that overall, they have a positive impact on food waste collection. Some respondents suggest that further research on the possibilities of paper liners be included. Other respondents suggest the environmental impact of caddy liners needs to be explored, or that guidance should be sought from anaerobic digestion plants on the easiest material for them to break down.

Many respondents suggest that clear guidance and specification on caddy liners should be produced for household. Some respondents suggest that there should be consistent or on-going communication, on a nationwide scale, to prevent confusion and contamination.

Many respondents, make varied suggestions about alternative approaches to using caddy liners for food waste collections including the following: national and local campaigns, no food waste stickers on refuse bins, using no liners, using any bag, or restricting residual capacity.

Some respondents suggest that it should be up to local authorities to decide whether caddy liners should be used for food waste collections, so that they can consult with residents, consider local demographics, and work with local reprocessors, to decide if they would have a positive impact.

Some respondents express concerns with caddy liners becoming compulsory for food waste collection because they are expensive, unnecessary, or difficult for anaerobic digestion facilities to treat.

Some respondents suggest that local authorities should provide caddy liners to households. For example, respondents suggest that they should be free of charge (noting that some local authorities already do this) and that providing caddy liners to households will help to prevent contamination later on in reprocessing.

Some respondents suggest that the ongoing cost of cady liners should be funded through the new burdens system, as local authorities' funds and services are overstretched and there will otherwise be less food waste collected.

A few respondents suggest that there should be increased regulation or certification of caddy liners which claim to be biodegradable or compostable. Some respondents suggest that those which do not meet recognised standards should be banned or heavily penalised.

A few respondents suggest that whilst caddy liners should be used for food waste collection, that only an initial supply of liners should be provided to households, to help this behaviour become normalised.

A few respondents suggest that caddy liners should be exempt from the plastic packaging tax, VAT, or both, as there should not be a financial disincentive for the public to do something that helps the environment.

9. Proposal 6: Compostable and biodegradable materials

9.1. Question 17

9.1.1. Do you have any comments on how the collection and disposal of compostable and biodegradable materials should be treated under recycling consistency reforms? For example, this could include examples of what should be provided in guidance on the collection and disposal of these materials.

This question was answered by 530 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Communication / education / labelling	20%	8%	33%	37%	29%	17%
Concerns Contamination of these waste streams	12%	4%	16%	18%	23%	31%
Concerns Opposition to collecting these materials (general)	8%	1%	21%	6%	10%	8%
Concerns Public confusion about what can be recycled	8%	1%	20%	10%	10%	6%
Suggestions Further research needed	7%	1%	20%	2%	0%	3%

Support

Many respondents express general support for free-of-charge collections of compostable food and garden waste.

Many respondents support Government's intention to exclude biodegradable and compostable materials from recycling waste streams because they believe that the benefits of collecting these materials are unproven.

Some respondents express general support for the use of biodegradable and compostable packaging as they believe these materials are more environmentally friendly than plastic.

Some respondents support the use of compost produced from food and garden waste, which they believe is better for soil health than Defra's current practice of spreading whole digestate on land.

A few respondents support Government's proposed policies for dealing with organic waste because they may reduce greenhouse gas emissions, though they do not explicitly link these views to biodegradable and compostable materials.

Concerns

Some respondents express concerns about the unintended consequences of collecting biodegradable and compostable packaging

- Many respondents express concerns that biodegradable and compostable packaging may contaminate and reduce the quality of existing plastic, food, and garden waste streams.
- Many respondents express concerns that collectors and sorters may find it difficult to identify biodegradable and compostable materials.
- Some respondents express concerns about a potential link between compostable plastics and microplastics, which may be detrimental to the environment, animals, and human health.
- Some respondents express concerns that many anaerobic digestion plants may find biodegradable and compostable packaging difficult to reprocess and may not currently accept these materials.
- A few respondents express concerns about the quality of garden waste, which they believe should be processable to the PAS100 standard.

Other respondents express concerns about the potential consequences of excluding biodegradable and compostable materials from mandated collections

- Many respondents express concerns that the proposed exclusion of compostable plastics from the recycling waste stream, and the Environment Bill's presumed categorisation of compostable plastic together with other plastics, may be discriminatory against these materials.
- Some respondents express concerns about the potential consequences of excluding biodegradable and compostable packaging for collections. For example, if local authorities can collect these materials independently, then collections across the UK may vary.

Respondents express concerns about perceived public misconceptions about biodegradable and compostable packaging

- Many respondents express concerns about perceived public misunderstanding around how biodegradable and compostable materials should be disposed of, including whether they should be recycled or composted at home.
- Many respondents express concerns about perceived public confusion over the definitions of the terms 'biodegradable' and 'compostable' and believe the

public may not be able to distinguish between them.

- Some respondents express concerns that the public may be overconfident about the environmental benefits of biodegradable and compostable packaging.

Respondents express concerns related to the Environment Bill

- A few respondents express concerns about an amendment to the Environment Bill which has recommended that compostable materials should be collected with food and garden waste.
- A few respondents express concerns that collecting compostable plastics together with other streams may be inconsistent with the Environment Bill, which mandates that plastic should be collected separately.

Suggestions

Many respondents suggest a variety of approaches to the use and disposal of biodegradable and compostable packaging, including:

- label them as non-recyclable and treat them with residual waste;
- collect them through in-store take-back schemes;
- collect them with food and garden waste;
- collect and reprocess each material separately from each other;
- encourage householders to compost them at home where possible;
- exclude them entirely from kerbside collections;
- disincentivise their use, for example by using Extended Produce Responsibility modulated fees;
- limit the use of compostable packaging to specific scenarios, such as festivals, where separate bins can be provided, and a composting route can be obtained; and
- ban biodegradable materials entirely.

Respondents suggest a need to standardise or regulate the terms 'biodegradable' and 'compostable', so that the terms align with specific disposal routes

- Many respondents suggest that only packaging that meets the BS EN13432 standard should be called 'compostable' and that the term 'biodegradable' should not be used as it lacks an equivalent certification.
- Some respondents express concerns that the definitions of compostable and biodegradable packaging in the proposals are inconsistent with other packaging legislation and may be much broader than other definitions such as the BS EN13432 standard.

Respondents suggest that guidelines around biodegradable and compostable packaging should be easy to understand and use

- Many respondents suggest that clear communications about how to dispose of biodegradable and compostable materials are needed to educate the public. Specific suggestions include the use of 2D QR codes on recycling bins, leaflets, consistent labelling, and colour coding. Some respondents suggest allocating a budget for communications about this material.
- Many respondents suggest that guidance on biodegradable and compostable

materials should cover how local authorities should set collection fees for these materials, the effects, and costs of contamination and whether pet food and cooking oils are included. Some suggest that the guidance should reflect the terminology used by producers of these materials.

Respondents suggest that further research and reviews are needed

- Many respondents suggest that further research into the following is needed:
 - how compostable and biodegradable plastic degrades in real-world conditions rather than laboratories;
 - the technology that would be needed to sort and break down these materials; and
 - life-cycle assessments of the environmental impacts of these materials, compared to alternatives.
- A few respondents suggest that Government should regularly review whether its requirements for mandatory collections of biodegradable and compostable are being met.

Respondents make several suggestions about how collections of biodegradable and compostable packaging should be implemented

- Many respondents suggest that food service businesses should only be able to use reusable and certified compostable foodservice packaging such as Vegware, which they believe is already widely collected and processed.
- Some respondents express concerns that the infrastructure needed to process biodegradable and compostable packaging may be insufficient and suggest that Government should promote better infrastructure, without specifying how to do this.
- A few respondents suggest that the methods used to collect and process organic waste should meet net-zero carbon criteria.
- A few respondents suggest that, if compostable bags are used in collections, they should be treated by in-vessel composting plants because anaerobic digestion plants may not treat them.
- A few respondents suggest that, if Government mandates the collection of biodegradable and compostable materials, Extended Producer Responsibility payments should cover the cost of this to local authorities.

9.2. Question 18

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

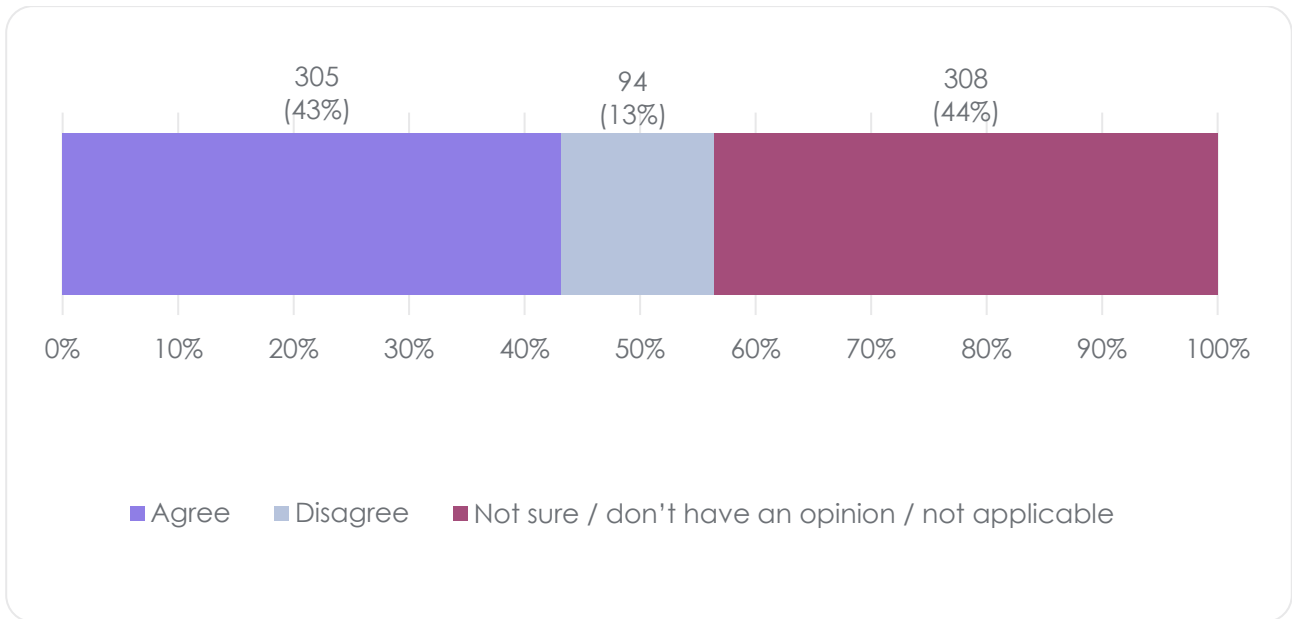


Figure 20 Question 18, (n=707)

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

This question was answered by 321 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Financial cost	12%	1%	38%	0%	0%	14%
Concerns Inadequate infrastructure / burden on AD plants	8%	1%	20%	0%	3%	19%
Support General support / helps the environment	7%	5%	12%	8%	3%	6%
Concerns Unnecessary	5%	1%	10%	0%	0%	25%
Suggestions Alternative approach	3%	0%	8%	0%	3%	14%

Support

Many respondents support an additional composting phase because of the potential environmental benefits of ensuring biodegradable and compostable liners are processed,

including minimising carbon emissions.

Many respondents express support for the proposals on the basis that they may allow packaging that is certified to composting standards to be included in food waste collections.

Some respondents express support for the proposals as long as various conditions are met, including Government supporting anaerobic digestion plants, new burdens funding covering increases in gate fees, compostable plastics not producing microplastics, end markets being established, and the end product being suitable as a soil conditioner.

A few respondents express support for the proposals because they may create a supply of compost for households and agriculture.

A few respondents support the use of compost produced from food and garden waste, which they believe is better for soil health than Defra's current practice of spreading whole digestate on land.

Concerns

Many respondents express concerns that an additional composting phase may be unnecessary if the costs outweigh any potential benefits. Some respondents believe a composting phase would only be necessary if compostable caddy liners are mandated.

Many respondents express concerns that mandating a composting phase may increase operating costs and infrastructure investment, and therefore gate fees. Respondents suggest that such additional costs should be covered by new burdens funding.

Many respondents express concerns about potential barriers to an additional composting phase for anaerobic digestion plants, including planning constraints, lack of space, and need for additional infrastructure. Respondents believe that such upgrades would require substantial amounts of time, resources, and investment.

Many respondents express concerns that they do not know enough about the topic to answer the question, with some suggesting that anaerobic digestion operators are best placed to answer.

Many respondents express concerns that a composting phase may not be effective in dealing with contamination from materials such as non-compostable plastic, with many respondents specifically concerned about microplastics.

Some respondents express concerns that an additional composting phase may increase methane, ammonia and odour pollution from anaerobic digestion facilities, potentially harming air quality, soil quality and water systems.

A few respondents express concerns that the proposed timescales for introducing a composting phase might be difficult to achieve, especially for smaller anaerobic digestion facilities.

A few respondents express concerns that the proposals may not align with environmental permitting conditions.

Suggestions

Many respondents suggest alternatives to mandating a composting phase, such as

improving digestate quality by reducing contamination. They also suggest using specific methods such as pyrolysis and converting waste into biofertilizer. Respondents make a range of other suggestions relating to the collection and treatment of food waste:

- Many respondents suggest disincentivising or banning biodegradable and compostable materials, which they hope would remove the need for a composting phase.
- Many respondents suggest pre-treating waste using technology such as AeroThermal's Thermo-Pressure Hydrolysis, which they claim facilitates the processing of compostable materials at anaerobic digestion sites.
- Some respondents suggest that anaerobic digestion plants should remove liners from food waste before treatment, then send them to energy recovery.
- Some respondents suggest that food waste prevention should be prioritised over the collection and treatment of food waste.
- Some respondents suggest promoting 'Dry AD' technology, which includes both digestion and composting phases and permits co-treatment of food and garden waste, as this may reduce financial costs and carbon emissions.
- Some respondents suggest that the environmental impacts related to treating food waste should be added to local authorities' carbon budgets.
- A few respondents suggest reprocessing compostable and biodegradable materials separately, which they believe can maximise environmental and commercial benefits.
- A few respondents suggest that local authorities should be able to decide whether a composting phase is used.
- A few respondents suggest that the adoption of PAS110 requirements should be sufficient to ensure all contaminants are removed.

Many respondents suggest that further clarity and or research into the following may be needed about:

- the ability of a composting phase to break down compostable and biodegradable materials;
- the benefits of using biodegradable and compostable materials instead of recyclable packaging or paper liners; and
- the benefits of a composting phase and potential end markets for compost and digestate.

Some respondents suggest that Government should incentivise and provide funding for national infrastructure to help fulfil the demands of the proposals.

10. Proposal 7: Definition of garden waste

10.1. Question 19

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

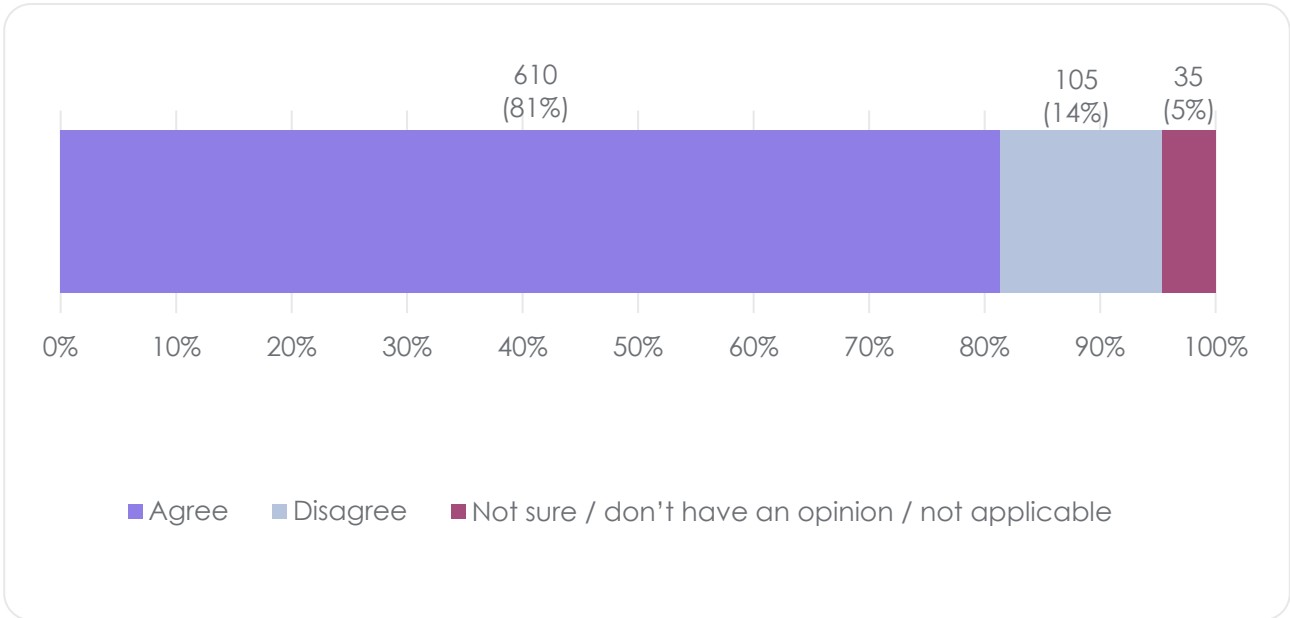


Figure 21 Question 19, (n=750)

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

This question was answered by 270 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Greater detail / clarify / definition required	11%	1%	34%	0%	3%	6%
Support Support	8%	2%	20%	0%	10%	6%
Suggestions Items to exclude Invasive / harmful plants / weeds	7%	1%	21%	0%	0%	3%

Concerns Contamination (esp. garden weeds)	6%	0%	18%	0%	0%	3%
Suggestions Branches	4%	4%	5%	8%	3%	3%

Support

Many respondents express support for the definition of garden waste outlined in Proposal 7 because it is already in line with current local collection guidelines.

Concerns

Many respondents express concerns that the proposed definition needs more detail to clarify the status of certain products. For example, turf cuttings, Christmas trees, and windfall fruit.

Many respondents express concerns that providing garden waste collection for all properties could result in increased contamination, therefore affecting the quality of the final compost product. Respondents express concern about the use of the term 'garden weeds', which they think is misleading because certain types of garden weeds, including Japanese knotweed, Ground Elder and Bindweed, could spread easily if composted and could affect the quality of the final compost product.' For these reasons, respondents believe more detail is needed to clarify which types of weeds should be included in the garden waste stream.

Some respondents express concerns about the difficulty of separating all soil from other garden waste to fully comply with the proposed list of accepted garden waste materials. For example, where plants and flowers may have some soil included in their roots, as well as lawn waste where grass may be attached to soil.

Some respondents express general concerns about the cost of a separate garden waste stream, as well as the potential loss of income to, and impact on other existing services provided by, local authorities.

A few respondents express concerns that the introduction of a free garden waste collection could disincentivise the use of other more sustainable waste management methods such as home composting.

A few respondents express concerns about the mandated collection of any items that could create reprocessing difficulties. Respondents express concerns that larger branches could affect output compost quality or damage shredding machines at composting sites. Therefore, respondents suggest that more clarity for maximum branch size is required.

A few respondents express concerns that only materials that can be bulk composted should be included in garden waste collections.

Suggestions

Suggestions - include in the list

Many respondents suggest that the following should be included in the accepted materials list:

- garden tools and other gardening equipment;
- waste from allotments and vegetable gardens;
- waste from herbivorous animals including plant-based animal bedding made up of hay/straw;
- plant pots made of biomass or compostable materials;
- soil, because excluding it could make recycling plants harder. For example, in the case of hanging baskets, soil remains attached to roots;
- tea bags and coffee ground as they could add value to the waste stream without the need for additional processing; and
- 'prunings'.

Suggestions - exclude from the list

Many respondents suggest that specific products that could impact output compost quality should be excluded from the accepted materials list. These include invasive species like Japanese knotweed and garden waste that has been treated with herbicides or weed killer, as well as infected or diseased plant materials. Respondents also suggest that any type of plastic, including bags, liners, and pots, should be excluded from the list of accepted garden waste materials, as they feel plastic is the biggest contaminant at composting sites.

Many respondents suggest that large logs/branches should be excluded from the list of accepted garden waste materials. Respondents suggest that further clarification on branch size is required and suggest a maximum size of branch accepted in garden waste should be included to avoid confusion for residents. For example, 'nothing over 3 inches diameter' or 'nothing thicker than your wrist.' Alternatively, respondents suggest that larger branches and Christmas trees should be accepted as materials for garden waste, as long as they have been cut down.

Some respondents further suggest that the following should be excluded from the list of accepted garden waste materials:

- general household waste such as, ash, garden chemicals, disposable nappies, sand, sawdust, and animal waste;
- food and kitchen waste;
- turf due to excess weight in bins; and
- windfall products.

Other suggestions

Many respondents suggest that a commitment to waste prevention as part of the waste hierarchy is most important. Respondents suggest alternative methods, such as home composting and other carbon reduction methods, should be promoted over a separate garden waste stream. Respondents suggest compostable materials/packaging, food and kitchen waste should not be included in the proposed list of accepted garden waste materials.

Many respondents suggest further guidance and communication would be needed to assist households to comply with the proposed list of accepted garden waste materials. For example, respondents suggest that further clarification is needed on whether windfall products such as fruit should be classed as garden waste or food waste.

Many respondents suggest that, due to the biologically aggressive nature of garden waste, where local authorities use additional sacks alongside 240l wheelie bins these sacks should be made of certified compostable materials and able to hold materials for a minimum of 2 weeks, in line with a fortnightly collection schedule, or even up to 4 weeks, to account for possible missed collections.

A few respondents suggest garden waste collection should be free and Government should include any associated costs under new burdens funding.

A few respondents suggest any proposed accepted garden materials list should align with permitting requirements based on material quality.

A few respondents suggest that a collection for bulky waste, as referenced in the proposal, should be provided every 4-6 weeks to discourage fly tipping.

A few respondents further suggest that all plant pots should be made of compostable or recyclable materials thereby allowing pots to be accepted in either garden waste or dry recyclable waste streams.

11. Proposal 8: Increasing the recycling of garden waste from households

11.1. Question 20

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

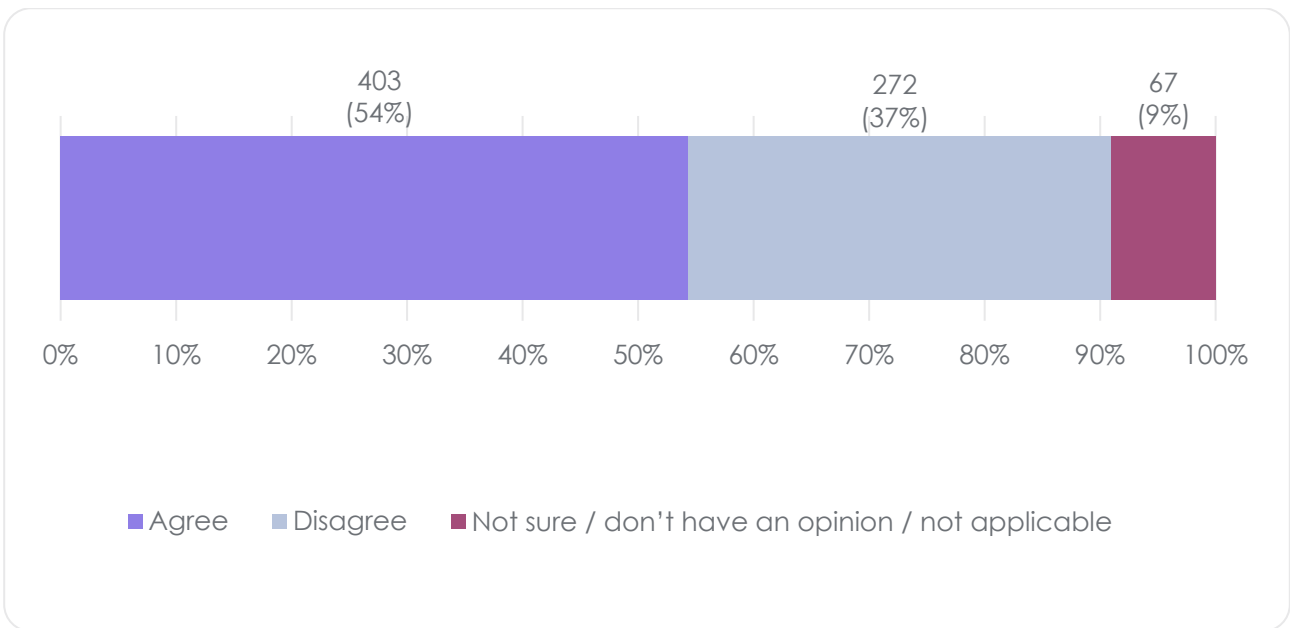


Figure 22 Question 20, (n=742)

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

This question was answered by 420 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5

Concerns Financial cost Cost to residents without gardens	19%	7%	40%	25%	10%	6%
Suggestions Charge for collections	17%	5%	45%	16%	0%	6%
Concerns Financial cost Cost to local authorities	15%	1%	48%	0%	0%	6%
Concerns Carbon emissions of more collections	12%	0%	39%	0%	0%	3%
Concerns Disagree with estimated costs and benefits	11%	0%	37%	0%	0%	3%

Support

Many respondents express general support for a free garden waste collection service that is available to all households, suggesting this is a fairer system that prevents garden waste collection from being cost prohibitive. Respondents suggest such a service may therefore increase recycling rates and may encourage householders to be more invested in gardening and nature preservation.

Some respondents express support for a free garden waste collection service, based on perceived environmental benefits. Respondents suggest that such a service will reduce the carbon emissions associated with people driving garden waste to recycling centres. Respondents further suggest that a free service may encourage those not paying for collections to refrain from environmentally unsound disposal methods, such as fly-tipping and bonfires. Other respondents support free collections as a way of increasing the potential value recoverable from garden waste and note that the compost produced could be used for the benefit of public areas.

A few respondents express support for a standardised, national approach to minimising the volume of garden waste in residual waste collections, suggesting legislation should prohibit householders from disposing of garden waste incorrectly. These respondents are open to local authorities charging for garden waste collection but suggest that maximum charges should be standardised.

Concerns

Many respondents express concerns that free fortnightly garden waste collections would in fact be funded by taxpayers, and not all taxpayers will need or want a garden waste collection service. Respondents feel a free waste collection service may cause council tax rates to rise for all. Respondents express concerns about whether it is appropriate to use taxpayer money to fund a service many do not use and suggest it may be misleading to describe the service as 'free' when it is funded through taxation.

Many respondents express concerns about the financial implications of providing a free fortnightly garden waste collection service. Concerns include:

- that this will reduce income for local authorities currently charging for this service,

- whilst at the same time increasing their expenditure;
- that the new burdens funding to local authorities may not cover the full cost or cover the loss of income in instances where a paid-for service is suspended;
 - that the duration of new burdens funding will not be sufficient; and
 - that whether such funding may necessitate cuts to funding in other areas.

Many respondents express concerns about the environmental impact of providing a free service. Concerns include:

- that environmental benefits may not outweigh the financial or environmental costs, particularly due to increased collection vehicle emissions;
- that a free service may reduce incentives to home compost and therefore may increase waste; and
- that the 240L bin may be too small for some households and therefore still require additional carbon-emitting trips to a recycling centre.

Many respondents express concerns as to the necessity of a free fortnightly garden waste collection service, suggesting most of those who currently produce garden waste either pay for collection or take their waste to recycling centres. Respondents believe that current capture rates for garden waste through paid-for collections are already high and express concerns regarding the demand for a free garden waste collection service. Some respondents give examples from their area, noting that garden waste constitutes a very small percentage – in some cases just 0.3% – of residual waste, and question if and how this could be improved by a free service. Respondents feel there is limited evidence to suggest that a free service will improve the volume of garden waste collection, and some respondents suggest that such a service would likely be especially inefficient in urban areas, where few properties have gardens.

Many respondents express concerns about the availability of adequate composting facilities to process potential increased garden waste. Respondents express further concerns about the availability of parking spaces and qualified drivers needed for additional collection vehicles. Respondents express concerns that the proposals may result in more collection vehicles on the road and therefore increase carbon emissions. Respondents are concerned that any policy necessitating more vehicles may not be environmentally efficient.

Many respondents express concerns regarding the assumption they feel Defra makes about the volume of garden waste that may be diverted from the residual waste stream under a free garden waste collection service. Many respondents question the veracity of this assumption, noting that their own experience suggests otherwise.

Many respondents express concerns that free fortnightly garden waste collections will not increase the amount of garden waste that is collected and recycled, or significantly reduce the volume of garden waste that is collected as part of the residual waste stream. Respondents suggest that in their own experience, there is little difference in the volume of garden waste collected from free and paid-for collection services, and therefore question the need to introduce a mandatory free collection system.

Many respondents note that some householders may not have room for an additional garden waste bin. Others express concerns that if both free garden waste collection and

mandatory separated waste collection are introduced, householders will be required to use and store a large number of recycling containers.

Many respondents express concerns over details of the proposed free fortnightly garden waste collections which they feel are unclear. Examples include:

- funding and compensation available to local authorities;
- which properties would qualify for the service;
- definition of 'garden' and 'growing season'; and
- communication costs of a change in service.

Some respondents express concerns that making garden waste collection a free service could devalue it, meaning householders may take less care separating garden waste, leading to contamination. Some respondents comment that in their experience a paid-for service results in higher quality of garden waste collected.

A few respondents express concerns regarding the additional compost that may be created through free garden waste collection. Respondents note that it may be difficult to identify an end market for this limited value product and it could therefore end up as waste.

A few respondents express further concerns that while the proposal allows local authorities to charge for garden waste collections additional to the free fortnightly service provided, in practice this would logistically be very challenging to implement. Respondents comment that the administrative costs might outweigh any income generated, and other respondents comment that introducing a charged service alongside the free service could create operational challenges for collection crews trying to distinguish between free and paid service users.

A few respondents express concerns that introducing a new free garden waste collection service may be confusing for residents who understand garden collection to be a paid-for subscription service based on need. Respondents also note that a free fortnightly service with optional additional paid collections may be a confusing system for householders to navigate.

Suggestions

Many respondents suggest that it would be more effective to encourage home composting rather than incentivising the use of garden waste collection services. They suggest that home composting is financially and economically preferable, as it does not require collection vehicles or processing equipment.

Many respondents suggest that if Government mandate free garden waste collections, the cost of implementing and running such services should be fully covered by new burdens funding and not council tax income. Similarly, respondents suggest that new burdens funding should cover any loss of income local authorities experience upon ceasing paid-for collections.

Many respondents suggest that local authorities should be free to decide if and how they provide a garden waste collection service, based on local infrastructure and their understanding of the area. Some respondents suggest that local authorities should be allowed to charge for a service – such as garden waste collection – not utilised by all

residents. Some respondents note that charging for this service creates an efficient 'opt-in' system that can be used by those who need it and prevents the increased carbon emissions that may result from vehicles providing a collection service to areas that do not want or need it. Some respondents also suggest that even with a free fortnightly collection some householders will require additional garden waste collections, and so local authorities should have the option to provide such a service for a fee.

Some respondents suggest that local authorities feel that they already have effective garden waste management systems in place, many of which include a combination of paid-for collections and free access to recycling centres. Respondents feel this approach is flexible and fair and suggest local authorities already operating effectively should be allowed the freedom to continue doing so.

Some respondents suggest local authorities should be exempt from providing free garden waste collection services if they offer a garden waste chipping service. Some respondents suggest different sized collection bins should be offered to suit householders' storage availability.

Some respondents suggest more research is needed to examine the relationship between the proposed free garden waste collection service, Extended Producer Responsibility, and the deposit return scheme, to ensure there is no unnecessary overlap, and therefore expenditure. Other respondents suggest research should be conducted to ascertain whether it is worth introducing a free collection service for a potentially minimal increase in garden waste yield, as well as whether combined food and garden waste collections may be a more efficient option.

Some respondents suggest that recycling centres already offer a free method of recycling garden waste, and that trips to such a centre could also encourage householders to recycle other items they may have otherwise disposed of with residual waste. Respondents note that using recycling centres is more flexible than fixed-time kerbside collection, and suggest such centres are already well used.

A few respondents suggest that paid-for or subscription garden waste collection services are preferable. They believe such services are more financially sustainable than a free service funded by Government while still effectively diverting garden waste from the residual waste stream. Other respondents suggest that a free collection service could be 'opt-in' to avoid unnecessary bin distribution and collection vehicle emissions.

A few respondents suggest that the goal of preventing garden waste contaminating the residual waste stream could be more effectively met through legislation, for example by prohibiting garden waste in landfill.

A few respondents suggest that the co-collection and composting of food and garden waste together would be more environmentally efficient and cost effective than the separate collection of garden waste, particularly in urban areas where garden waste is likely to be limited.

A few respondents suggest that focussing efforts on improving the collection and recycling of food waste and dry mixed recycling materials would produce better economic and environmental outcomes than providing free garden waste collections.

A few respondents suggest that a free garden waste collection service should not only operate during 'growing season', as garden waste is still produced outside of this timeframe. Some respondents point out that because of climate change milder temperatures may elongate the traditional 'growing season' so that eventually there may be little difference in garden waste volume throughout the year. Others note concerns of only providing a service for part of the year, stating that there is demand for a garden waste collection service in winter to deal with waste from dead plants and leaves. A few respondents state that there may even be additional seasonal demand during peak periods.

A few respondents suggest that free garden waste collections could take place every three or four weeks, as opposed to fortnightly, to reduce collection vehicle emissions and ensure efficiency as garden waste bins would more likely be full.

12. Proposal 9: Increasing the recycling of garden waste from households

12.1. Question 21

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

12.1.2. Provide updated guidance on reasonable charges for garden waste

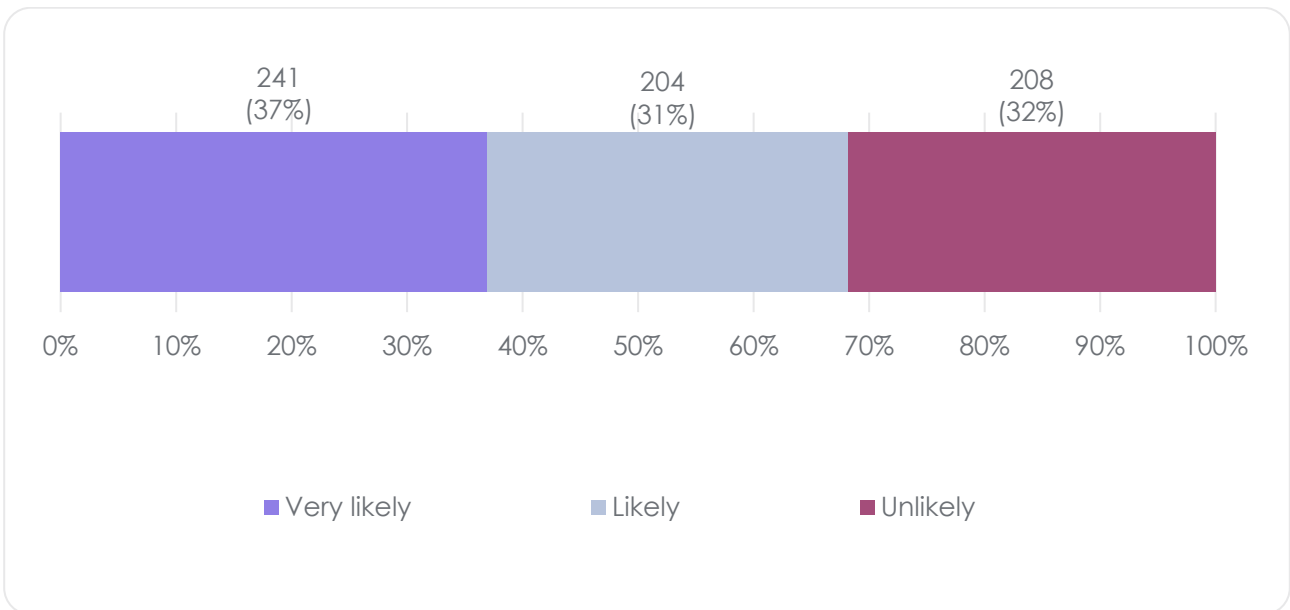


Figure 23 Question 21, "Provide updated guidance on reasonable charges for garden waste" (n=653)

12.1.3. Issue clear communications to non-participating households

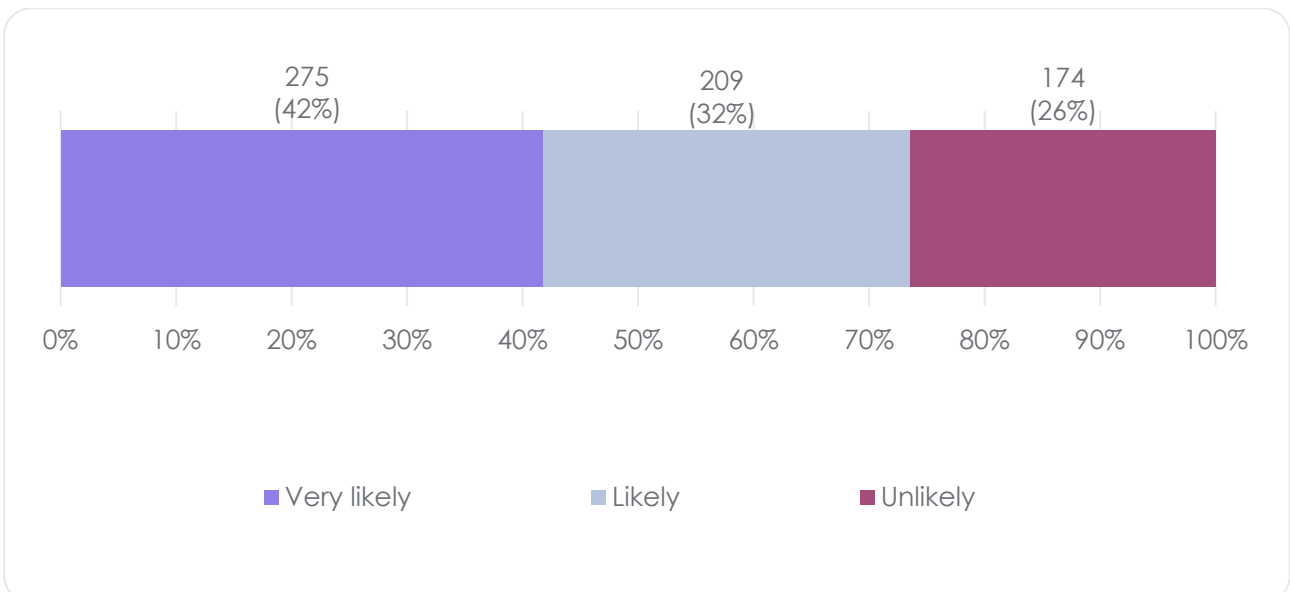


Figure 24 Question 21, "Issue clear communications to non-participating households" (n=658)

12.1.4. Support on increasing home composting (e.g. subsidised bin provision)

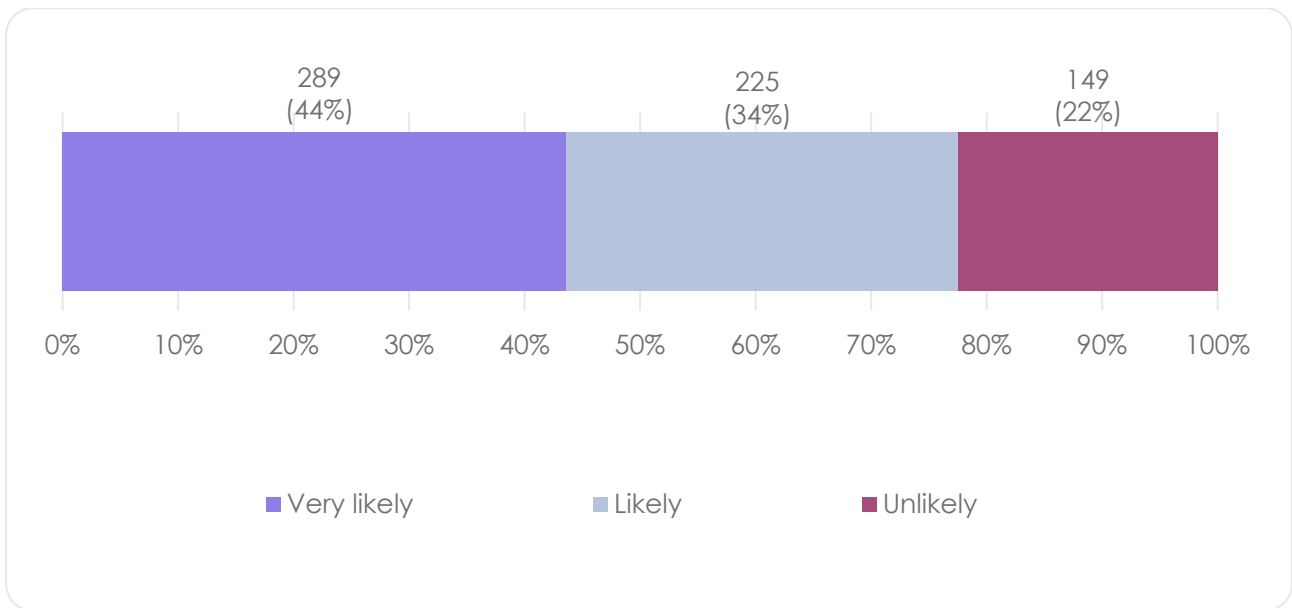


Figure 25 Question 21, “Support on increasing home composting (e.g. subsidised bin provision)” (n=663)

12.1.5. Comments

Question 21 was a closed question which did not give space for comments. However, a number of respondents made comments in emails, or in response to other questions, which were labelled as being for this question. Their comments are summarised below.

Support

Many respondents express general support for the proposed policy measures, as ways to increase the recycling of garden waste and decrease the quantity of garden waste in residual waste streams. Some respondents state that all the proposed policy measures should be pursued, with or without a free garden waste collection service.

Some respondents express support for the proposed policy measure of providing updated guidance on reasonable charged for garden waste. Respondents state that this would help to dispel the myth that local authorities use chargeable garden waste services as income generators.

Many respondents express support for the proposed policy measure of providing support on increasing home composting, to increase the recycling of garden waste and decrease the quantity of garden waste in residual waste streams. Respondents state that providing support on increasing home composting is the best, or most useful, policy measure. Some respondents state that local authorities will need support from Government to deliver this policy measure.

Concerns

With respect to the three options provided in the closed question:

- Some respondents express concerns about the proposed option of providing clear communications to non-participating households, commenting that they feel Government communications would not be more effective than local authority communications, which have long been established, or state that

- Government should stay out of this 'crowded space'.
- Some respondents comment that they feel the proposed measures to increase the recycling of garden waste and decrease the quantity of garden waste in residual streams are not required. This is because some local authorities already have established garden waste recycling measures which produce high capture rates, or because waste compositional analysis has shown that very little garden waste makes its way into residual streams.
 - A few respondents express concerns about the proposed option of providing updated guidance on reasonable charges for garden waste, suggesting that guidance on charges may not increase recycling rates and that Government should not intervene where local authorities already run subscription services.

Many respondents express concerns about the proposed option of providing support on increasing home composting, commenting that home composting requires significant space and knowledge for it to be effective.

Some respondents express concerns about the proposed measures, or about providing a free garden waste collection service. For example, respondents believe that the proposed measures will not work for residents in flats, that households without gardens should not subsidise other households garden waste, and that providing a free waste collection service will detract from the proposed policy measures.

Suggestions

Many respondents comment that their answers to Question 21 are contingent on the proposed policy aims being implemented alongside a paid for garden waste collection service.

A few respondents suggest other policy measures that they think could be used to increase the recycling of garden waste and decrease the quantity of garden waste in residual streams. Some respondents suggest that Government, rather than local authorities, should specify the annual calendar period a garden waste collection service should operate for, to prevent local differences in service suspension periods over the annual festive break. Other respondents suggest that Government should focus on the waste hierarchy and waste minimisation, as well as supporting local authorities with funding to communicate with residents.

12.2. Question 22

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

This question was answered by 478 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Charges	14%	2%	38%	4%	0%	6%
Support Support on increasing home composting Increasing home composting (general)	14%	4%	36%	12%	0%	3%
Suggestions Give local authorities enforcement powers	11%	0%	36%	0%	0%	8%
Concerns Financial cost to local authorities	10%	0%	33%	0%	0%	3%
Suggestions Funding / investment	8%	0%	25%	0%	3%	8%

Support

Many respondents express support for various ideas around garden waste, including:

- the separate collection of food and garden waste streams;
- issuing clear communication to non-participating households, as a way of increasing participation rates for garden waste recycling;
- providing updated guidance on reasonable charges for garden waste, as a way of increasing participation rates for garden waste recycling and ensuring consistency across local authorities;
- increasing home composting, stating that it is both a financially and environmentally effective way to minimise garden waste (some respondents express support for home composting over kerbside collections); and
- the provision of free or subsidised home composting bins, to reduce the barriers to home composting.

Some respondents express support for a free containers / garden waste collection service, as a way of increasing participation rates for garden waste recycling. Respondents comment that a free garden waste collection service may produce greater capture rates for garden waste than any of the other proposed options.

Some respondents express general support for a garden waste collection service and wider Government policy to recover value from organic material. Some respondents express support for all proposed options, as a way of increasing the capture rates of garden waste.

Concerns

Many respondents express concerns that introducing a free garden waste collection service may greatly increase financial costs for local authorities. Respondents express concerns about the price range stated in the consultation document, highlighting that there are regional variances, and comment that the proposed charge may not cover full collection costs. Others express concerns that using public funds for garden waste collection does not represent value for money or undermines the principle of the 'polluter pays'.

Many respondents raise concerns about how a free garden waste collection service, and the proposed alternative options, would be funded. Some respondents comment that significant increases in funding would be required, and query whether these costs would be covered by Defra or new burdens funding.

Some respondents express concern with the quality of evidence and data used to support the proposal. Specifically, respondents express concerns that it may not be possible to measure how much waste each home composting unit 'processes' in a year. Respondents go on to state that WRAP has previously produced good calculations on estimated figures and that this work should be reviewed and updated so that respondents can understand the impact measures on supporting home composting could have. Respondents also express concerns about the accuracy of carbon savings figures, commenting that they appear to be overstated.

A few respondents express concerns that issuing clear communication to non-participating households would have a limited impact on garden waste recycling, as they feel that:

- local authorities already have extensive recycling communication campaigns;
- non-participating households may have legitimate reasons for not engaging;
- residents already know the correct ways to dispose of garden waste; or
- campaigns alone may not be enough to encourage participation.

Some respondents express concerns that those without gardens might end up unfairly subsidising the costs of compost bins for those with gardens. Some respondents express concerns that this would have a disproportionately negative effect on lower income sections of society.

Some respondents express concerns about the effectiveness of promoting home composting, on the basis that the take up of home composting may be minimal if a free garden waste collection service is provided.

Some respondents express concerns about introducing provisions designed to support home composting. Respondents comment that some householders may not have the space to have a home compost bin, or express concerns about the health and safety implications of having a home compost bin, such as the possibility of attracting vermin. Respondents express concerns that introducing provisions for home composting will not effectively deal with garden waste streams, as there is a limit within society of who could and would compost. A few respondents therefore feel that the scheme lacks national potential, or that the volume of waste that residents could treat at home would produce marginal or insignificant benefits.

Some respondents express concerns that one or more of the proposed options may be unlikely to achieve the proposed policy aims of increasing the capture rates of garden waste. In relation to support on increasing home composting, respondents comment that subsidised containers may not help those who still cannot afford subsidised costs. Other respondents comment that some people do not compost at home because they can't afford a container, but because they lack the space, knowledge, or view home composting as a burden. In relation to updated guidance on reasonable charges, respondents comment that residents that require a garden waste collection service will already have signed up to a paid collection, and that reassessment of fees is therefore unlikely to have an impact. In relation to clear communication for non-participating households, and providing a free garden waste collection service, respondents comment that these measures may not guarantee that tonnages would increase or encourage uptake.

Some respondents express concerns that introducing a free garden waste collection service may result in greater levels of contamination of garden waste recycling, as householders may fill the container with their residual waste when other containers run out of space.

Some respondents express varied concerns about a perceived lack of detail within the proposal in regard to the following: whether free collection services would only be provided in the growing season, if the reasonable charge relates to a weekly or fortnightly service, if capping will allow for regional variations, and how housing stock with little or no outside space would be treated.

A few respondents express concerns that the potential introduction of charges for garden waste collections has, in the past, resulted in increased fly tipping and the use of household waste bins for garden waste. Respondents also express concerns that charging for garden waste may encourage householders to pave over their gardens, having a negative effect on biodiversity and wildlife.

A few respondents express general concerns about householders having sufficient space to store a garden waste or compost bin.

A few respondents express concerns that some householders will simply not engage with garden waste collection or composting schemes.

A few respondents express general concern and opposition to the collection of garden waste, on the basis that they believe public funds are better spent elsewhere, that natural gardens should be encouraged, that contamination of residual containers with garden waste is not an issue, or without specifying why they are opposed or concerned.

Suggestions

Many respondents suggest that local authorities should be allowed to charge residents for garden waste collection for the following reasons: to keep collection services running in the face of public sector cuts, to ensure only those who need to use the service pay for it, to ensure that garden waste collected is of high quality, and to encourage householders to take responsibility for their waste. Some respondents also make suggestions about how, and who, should calculate reasonable charges.

Many respondents suggest that local authorities should have greater powers to enforce garden waste recycling. Some respondents offer specific enforcement suggestions, for example banning garden waste from residual containers, or allowing local authorities to charge for waste presented in contravention of a S46 (Environmental Protection Act) notice.

Many respondents suggest that clear communication and free education on garden waste recycling is required to encourage participation, reduce contamination, and create long-term awareness. A number of respondents go further, suggesting that a comprehensive educational campaign should be implemented, citing Italy's biowaste campaign as an example of where they feel this has been done effectively.

Some respondents suggest that decisions over the type of garden waste collection service to be provided should be made by local authorities, who they feel can make judgements about charges and collection frequency based on residents needs and varying local costs.

Some respondents make suggestions about specific measures that could be put in place to support home composting. For example: national campaigns, banning garden waste from residual waste bins, financial help for local authorities, subsidies, offering a chipping/shredding service.

Some respondents suggest that local tips / recycling centres could be used as collection points/ bring sites, for the disposal of garden waste and as community compost areas.

Some respondents make varied suggestions about how frequently garden waste should be collected. Some respondents suggest that garden waste should only be collected within specific months, for example March to November, or that collection should be aligned with the growing season. Others suggest that a garden waste collection service should also include a provision for the festive period, to help dispose of Christmas trees and wreaths, or that collections should operate on a weekly, fortnightly, or monthly basis.

A few respondents suggest that further consultation or research is required for the proposal. For example, respondents suggest that resident behaviours should be explored considering the Covid-19 pandemic, and others suggest that a compositional analysis of residual waste is necessary for the consultation.

A few respondents suggest that placing restrictions on the capacity of residual waste containers or reducing the frequency with which residual waste is collected, would encourage better recycling practice, and reduce the amount of garden waste in the residual waste stream.

A few respondents suggest that there should be one consistent country-wide scheme for a garden waste collection service, with exceptions only for those who cannot accommodate a garden waste bin.

A few respondents suggest that the end product from garden waste recycling could be redistributed within the local area, or sold back to residents as compost, to allow local authorities to recoup some of their costs.

A few respondents suggest that a combined food and garden waste collection service would be more economical, environmentally friendly, or convenient.

13. Proposal 10: Exemptions for the separate collection of two recyclable waste streams from households

13.1. Question 23

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

13.1.2. Plastic and metal

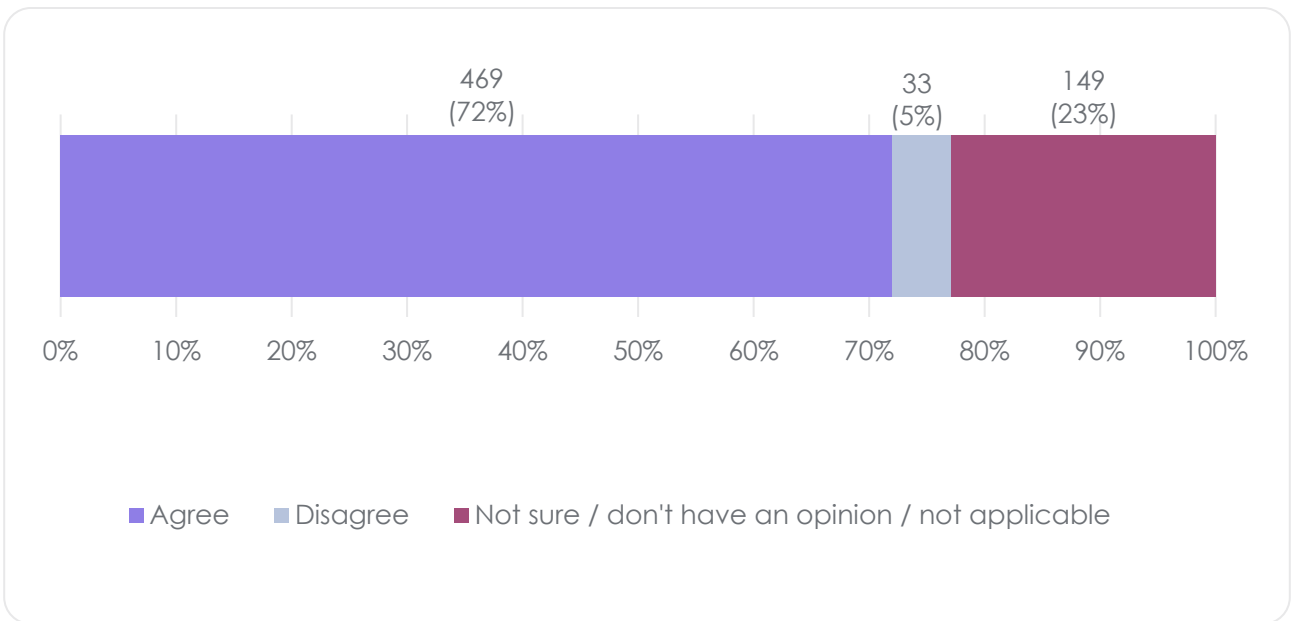


Figure 26 Question 23 – plastic and metal, (n=651)

13.1.3. Glass and metal

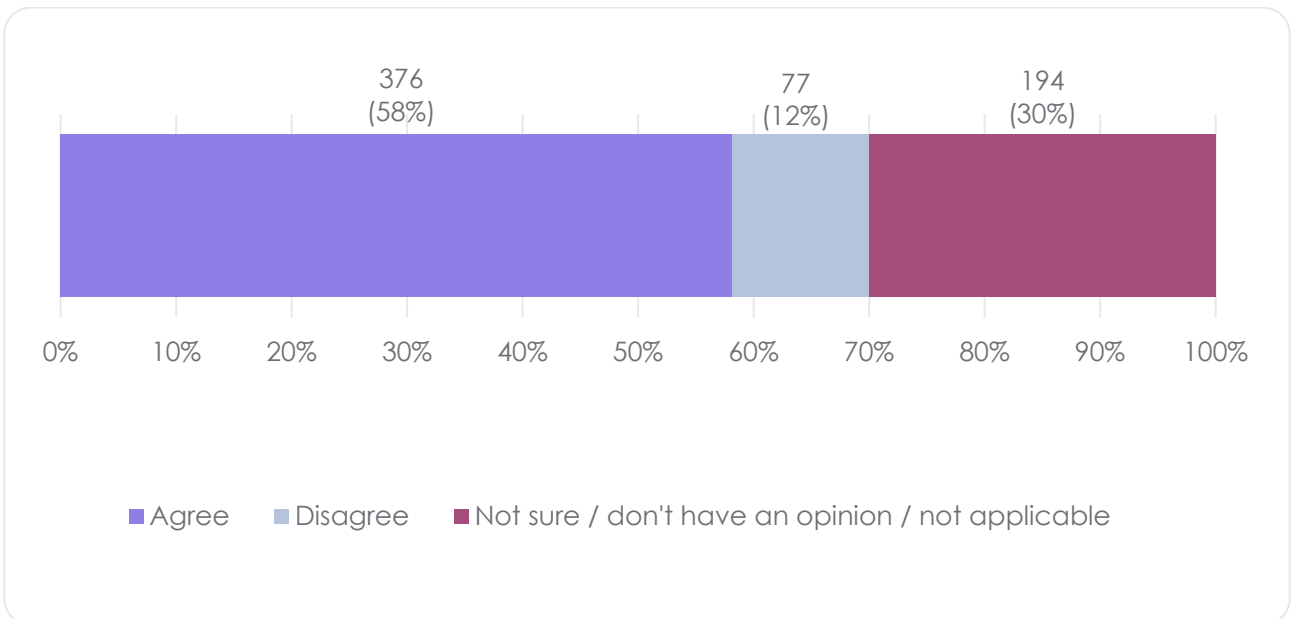


Figure 27 Question 23 – glass and metal, (n=647)

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

This question was answered by 441 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Plastic and metal Already collected together	9%	2%	26%	0%	0%	6%
Support Collecting waste streams together (general) MRFs can separate materials	9%	4%	13%	6%	6%	17%
Support Collecting waste streams together (general) Both already collected together	7%	5%	16%	0%	0%	3%
Concerns Contamination	7%	1%	14%	14%	6%	19%
Support Plastic and metal Easy to separate at MRF	6%	1%	16%	2%	3%	3%

Support

Some respondents express general support for the proposed exempt material streams of plastic with metal and glass with metal, perceiving these exemptions as way to promote 'higher recycling rates'.

When indicating support for a proposed exempt material stream, respondents give the following reasons:

- Many respondents note that in some areas these materials (including plastic and metal) are already being successfully collected, sorted, and recycled through co-mingled collection services.
- Many respondents note that co-mingled collections are already able to successfully produce 'high recycling rates' with good quality recycle. They note

- that glass with metal and plastic with metal are both 'easily separable'.
- Some respondents note that the co-collection of glass and metal in particular could have 'cost benefits' for local authorities.
 - A few respondents note that an 'increased yield is likely' with such co-collection systems, as these are easier for householders to navigate and require less storage space for bins – something which is particularly important for flats.

Many respondents express support for the proposed exempt material streams, providing there is sufficient sorting technology and infrastructure in place to efficiently – and cost effectively – separate materials and produce high quality recyclate.

Concerns

Respondents raise a number of concerns about contamination and recyclate quality

- Many respondents express concern that the co-collection of materials will lead to contamination causing a reduction in recyclate quality and 'disruption to the circular economy'. They note that high quality recyclate is imperative to ensuring 'greater environmental benefit'.
- Many respondents express particular concern for plastic film, glass – which can break and contaminate other materials including metals – as well as fibre materials, which are easily contaminated by glass and liquids.
- When it comes to glass, many respondents note that some material recovery facilities are not able to recover glass. Others notes that for glass, necessary colour sorting will be difficult if it is not collected separately.
- When it comes to plastic, some respondents express concern that the plastic waste stream is already 'very complex' to sort and manage, so collecting metal with plastic would only add to this complexity.

Many respondents express concern regarding food and drinks cartons. They note that Defra currently considers these to be part of the plastic waste stream, and that the impact on carton quality should plastic and metal be co-mingled is unclear. They suggest a separate collection stream for cartons may become necessary.

Some respondents, express concern regarding the economic practicability of co-collections. They note that separate waste streams allow materials to be sorted in the most cost-effective way, minimising contamination and maximising 'revenue from materials'.

Some respondents express concern regarding the safety risk to collection and processing staff of handling metal and glass together.

Some respondents express concern that separate glass collection is already noisy, and 'excessive noise levels' may occur if glass and metal are collected together. This could pose a health and safety risk to collection staff and a disturbance to householders.

Some respondents express concern over areas in the proposal they feel lack clarity. Examples include:

- the inclusion of cartons in the plastic waste stream;
- the inclusion of plastic film in the plastic waste stream; and
- the definition of 'metal'.

Some respondents express concern that it is difficult to evaluate the viability of exemptions

for mixed-stream collections until both Extended Producer Responsibility and the deposit return scheme are implemented and their impact is understood.

Suggestions

Many respondents suggest that householder engagement is critical to effective recycling. Respondents believe this is maximised when the recycling system is easy to understand and requires 'as few containers as possible', as with a co-mingled collection system.

Many respondents suggest co-collecting plastic, metal, and glass together in one stream, as the presence of plastic would reduce noise pollution during collection and cushion glass, minimising breakage and therefore contamination. Respondents suggest this approach also reduces the number of bins required and the sorting effort of householders.

Many respondents suggest that all materials should be separately collected to avoid contamination and potential sorting challenges which could negatively impact recyclate quality. Respondents particularly highlight the need for glass and fibre (paper and card) to have separate waste streams.

Some respondents suggest that a decision regarding possible exemptions to separate collection should only be made in consultation with the Extended Producer Responsibility system administrator, who has the legal authority to 'ensure environmental objectives are met'.

Some respondents suggest further research should be conducted in the following areas:

- whether co-collecting materials would 'significantly reduce recyclability';
- the environmental practicability of collecting separate waste streams;
- the impact of the deposit return scheme on kerbside recycling;
- the recycling of cartons and plastic film; and
- the 'viability of chemical recycling processes'.

A few respondents suggest that collecting glass in banks as opposed to kerbside collection is currently an efficient means of collection. In some cases, this creates funding for community groups through recycling payments, which may be lost with the introduction of mandatory kerbside glass collection.

A few respondents suggest local authorities should have the freedom to 'tailor collections' to the needs of their area. Additionally, respondents suggest that local authorities should be able to take 'enforcement action' against householders not complying with recycling systems.

13.2. Question 24

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

This question was answered by 446 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Exemptions Plastic, metal and glass	14%	0%	44%	0%	0%	14%
Support Collecting waste streams together Collecting waste streams together (general)	10%	3%	28%	2%	0%	8%
Concerns Too many waste streams / containers (potentially leading to lack of public acceptance)	10%	2%	30%	2%	0%	0%
Suggestions Exemptions Where end material quality / capture rates / reprocessing rates high	9%	0%	29%	0%	0%	8%
Support Collecting waste streams together MRFs can separate materials	6%	1%	17%	0%	0%	0%

Support

Many respondents express support for exemptions to mandatory separated waste collection. They believe co-mingled systems are more convenient for householders – therefore promoting participation whilst providing high volume of quality recyclate – and are already being used effectively.

Many respondents express support for exemptions to mandatory separated waste collection, noting that there are numerous examples of material recovery facilities able to successfully separate co-collected card, paper, plastic, and metal, and that sorting technology is continually improving.

Many respondents, express support for separated waste collection, which they believe 'significantly improves the potential' for effective, high-quality recycling, thus producing the best environmental outcomes.

A few respondents support the proposed exemptions, suggesting that there are 'strong health and safety grounds' for co-collecting glass with other materials, giving examples of noise reduction at collection, and reducing the risk of injury for handlers.

A few respondents support the exemptions to separated waste collection as they believe

this will make recycling easier for householders, however they note that exemptions should not be given if such co-collection compromises the volume of recyclate collected. They also note that certain materials – such as those with the highest ‘financial or environmental value’ – should be collected separately.

Concerns

Many respondents express concern about any exemptions to separated waste collection, suggesting such exemptions risk diluting a consistent recycling approach and prevent the ‘highest standards’ in recycling being reached. They suggest maximising effective recycling via separate collection should be the priority, and exemptions should only be permitted in ‘exceptional circumstances’.

Many respondents express concern that separated waste collection could be too complicated and ‘time consuming’ for householders, who may also lack space to accommodate multiple containers. Respondents caution that the ‘burdensome’ nature of separate waste collection could inhibit ‘residents’ engagement’ with recycling, whilst the smaller boxes used for separated waste collection may limit the amount of material recycled.

Some respondents express concern that possible impact of the proposed deposit return scheme on kerbside recycling has not been addressed or considered, making it difficult to evaluate the proposed exemptions. As an example, respondents note that if the deposit return scheme accepts metal but not glass, co-collecting these materials may be logical exemption. Alternatively, others suggest that ‘the stream of deposit return scheme materials should be kept segregated’.

A few respondents concern regarding the financial implications of introducing mandatory separate stream collections, particularly for local authorities that have recently made significant investments in co-mingled services. They note that the transition to a separate stream system would necessitate the procurement of new containers and collection vehicles, public education campaigns, and the hiring of additional staff.

A few respondents express concern that separate stream waste systems involve multiple boxes that need to be lifted by residents and collection operatives – unlike the wheelie bins used in co-mingled collection – and that repetitive lifting of heavy boxes risks ‘musculoskeletal injuries’. They additionally note that there could be ‘road safety issues with sorting waste in the street’.

A few respondents express concern that many local authorities currently do not have the necessary infrastructure in place to transition to separated waste collections, specifically noting challenges with lacking the ‘depot capacity’ for additional collection vehicles. Respondents also note that many households do not have space to accommodate multiple containers, including flats and ‘properties with no frontage’.

A few respondents express concern regarding the increased emissions – and thus negative environmental impact – created by a separated waste collection system. They note such a system would require additional collection vehicles, and that these vehicles would spend longer with ‘engines idling’ due to kerbside sorting.

A few respondents express concern that a separated waste collection system could be

environmentally inefficient, as collection vehicles would need to return to the depot once 'one of numerous compartments is full'. Alternatively, some participants express concern that co-mingled or twin stream collections may necessitate long-distance haulage of materials to appropriate sorting facilities, which may be a greater 'carbon cost' than separate collection systems.

Suggestions

Many respondents suggest that local authorities are best placed to understand the specific needs and operational practicalities of their area and should therefore have the freedom to decide the most appropriate collection system for them.

Many respondents suggest it would be 'prudent' to create a national 'container' exemption for the co-collection of glass, plastic, metal, and cartons – assuming cartons are included in the plastic waste stream – which they believe it is already possible to co-collect without quality loss. Other respondents suggest that as long as fibre is collected separately to prevent contamination, 'all other materials' can be co-mingled.

Many respondents suggest that where local authorities are successfully processing and producing a high volume of quality recyclate via co-mingled collection, they should be permitted to continue doing so.

Many respondents suggest that a decision regarding exemptions to separated waste collection should not be made until an Extended Producer Responsibility administrator is 'in place'.

Some respondents suggest that due to a lack of space it is logistically very challenging to implement effective separate stream recycling at certain properties, particularly flats and those in 'dense urban areas'. Respondents therefore suggest that an exemption to mandatory separated waste collection should be made for such areas.

Some respondents suggest that collecting food and garden waste together should be a permitted exemption. They believe that this would be economical and a 'better option for rural communities' as it would minimise vehicle emissions from multiple collections.

Some respondents suggest that twin stream system offers the most efficient system as they believe it is easier for householders, and therefore increases recycling participation and overall 'material tonnage', without compromising recyclate quality. Many respondents cite successful experience of twin stream collection services.

Some respondents suggest that decisions regarding exemptions to mandatory separated waste collection should be informed by industry capacity and capabilities in each area. Respondents note that material recovery facilities are not uniform and possess differing sorting and recovery abilities.

A few respondents suggest that careful consideration should be given to plastics, noting that there are many different types of plastic and that some – such as plastic film – may need to be collected separately to 'maximise recycling yield'.

A few respondents suggest that in areas where the volume of material collected is limited – such as rural or remote areas – co-mingled recycling may be more economically and practically appropriate, and thus an exemption should be put in place.

A few respondents suggest that further research is needed to examine the logistical, environmental, and financial implications to local authorities of introducing mandatory separated waste collection.

14. Proposal 11: Conditions where and exception may apply, and two or more recyclable waste streams may be collected together from households

14.1. Question 25

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

This question was answered by 489 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Relationship with EPR / DRS	12%	1%	31%	6%	19%	6%
Suggestion Specific definition / application considerations Residents / public behaviour	11%	0%	36%	0%	0%	8%
Support Support (general)	9%	3%	20%	12%	13%	14%
Suggestion Infrastructure changes	9%	0%	29%	0%	3%	8%
Suggestion LAs - support / allow them to decide	9%	1%	25%	2%	13%	6%

Support

Many respondents express general support for the proposed definition of 'technically practicable'.

A few respondents express support for the proposed definition of 'technically practicable' because they wish to see more recycling wherever possible regardless of local circumstances.

A few respondents express support for the proposed definition of 'technically practicable' because it makes sense to consider circumstances that could provide reason for exemption, such as challenges faced by older flats or houses in rural areas.

Concerns

Concerns associated with the definition:

Many respondents express concerns that the definition of 'technically practicable' could provide local authorities opportunities to exempt themselves. Respondents feel this would be inappropriate especially where businesses or producers are paying net costs of waste management. Many respondents express concerns that exemptions could impact the potential to significantly improve recycling rates and should therefore be limited.

Many respondents express concerns that the proposed definition is limited in a number of ways. For example:

- source separated collections are likely to be technically possible everywhere, but rather economic/societal barriers could complicate the process;
- 'proven to function in practice' could be used by local authorities to manipulate loopholes; and
- a general query for who will determine what circumstances are or are not 'technically practicable'.

A few respondents express concerns for the definition of 'technically developed' and suggest further clarification of this is needed to help local authorities understand if their service is 'technically practicable'.

Other concerns

Many respondents express concerns that the addition of extra containers is unfeasible and could have negative impacts. For example, confusion for residents, litter caused by containers without lids and the practicality of emptying numerous containers. Many respondents express concerns that a separated source collection would be less efficient than current co-mingled collection that are separated during processing.

Many respondents express concerns for the potential impact of incoming Extended Producer Responsibility and deposit return scheme on household collection systems. Many respondents express concerns that deposit return scheme could have a negative impact on the efficiency of source separated collections.

Some respondents express general concerns for the issues faced by flats/ houses of multiple occupation and terraced houses in accommodating multiple bins for source separated collection. Many respondents express particular concerns for flats built before modern recycling ethos became mainstream and therefore were not built with those infrastructure needs in mind.

Some respondents express concerns for the environmental impact of removing existing co-mingled collection bins with separate containers for source separated collection and the increased collections that could follow.

Some respondents express general concerns for health and safety related to manual handling of containers by both collection crew and customers particularly muscular-skeletal injuries.

Some respondents express concerns for the impact of separated collections on transport. For example, potentially increasing vehicle fleets where depots may lack space to store

them. Many respondents also express concerns that current vehicles do not have the capacity for source separated collections.

A few respondents express concerns for properties in rural locations where bins may be located further from households and walkers could potentially contaminate recycling by using bins for their waste. A few respondents express concerns that rurality is too wide an exemption and should only be used in limited locations.

A few respondents express concerns that adequate processing facilities and required end markets do not currently exist for source separated collections.

Suggestions

Suggestions – definition/application

- Many respondents suggest that 'technically practicable' should consider the impact of residents behaviour and participation in source separated collections because this could ultimately affect recycling collection services.
- Many respondents suggest that the definition should be adjusted to capture widely varying geographical circumstances. For example, flats above shops in low footfall areas versus flats in high footfall areas. Respondents feel the citing of a service provided to backstreet locations as 'technically practicable' should not be considered as proof of 'function in practice'.
- Many respondents suggest that where a materials recovery facility has demonstrated it can supply suitable end markets then any combination of collections co-mingled or separated should be 'technically practicable'.
- Some respondents make suggestions about what to consider under the definition of 'technically practicable'. For example: availability of staff; reduction and minimisation of littering/spillage; and ease of recycling for residents.
- Some respondents suggest local collection arrangements should be reviewed as part of a wider TEEP test and not just under the definition of 'technically practicable'.
- A few respondents suggest that mixed food and garden waste collections should not be required to demonstrate TEEP.

Other suggestions

Many respondents suggest that where major infrastructure changes are needed to accommodate source separated collections, this should be grounds for a technical exemption.

Many respondents suggest that what is technically practicable in one area may not be in another and local authorities are best positioned to make judgements based on their local circumstances. Many respondents therefore suggest the decision of what is 'technically practicable' should be at their discretion.

Some respondents suggest that where TEEP must feature, local authorities should be required to set out any measures and investment needed to make collection technically practicable in a written assessment. Many respondents suggest that the Extended Producer Responsibility Scheme Administrator should have a clearly defined role in supporting local authorities in overcoming any challenges. A few respondents suggest

that where collection is perceived as not 'technically practicable' this should be assessed on an initial smaller area before being expanded to cover the whole local authority area.

Some respondents suggest that local authorities should not be sole decider of what is or is not 'technically practicable'. Many respondents suggest additional consultation is needed with key stakeholders outside of local authorities. These include residents, producers, and waste management experts.

Some respondents suggest that 'technically practicable' is a loose term and therefore further guidance should be provided. Many respondents suggest clear statutory guidance should be brought in alongside any TEEP regulations.

A few respondents suggest that the understanding of the 'technically practicable' approach should be consistent between household and business collections to ensure efficiency.

A few respondents suggest that consistency should remain the priority and 'technically practicable' should not stop local authorities from finding practical solutions to any problems faced by implementing source separated collections.

A few respondents suggest that cited examples of existing recycling systems from other countries should not be used. Many respondents suggest that systems that work in other European cities such as Italy or Spain might not be practical in the UK.

14.2. Question 26

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

Response

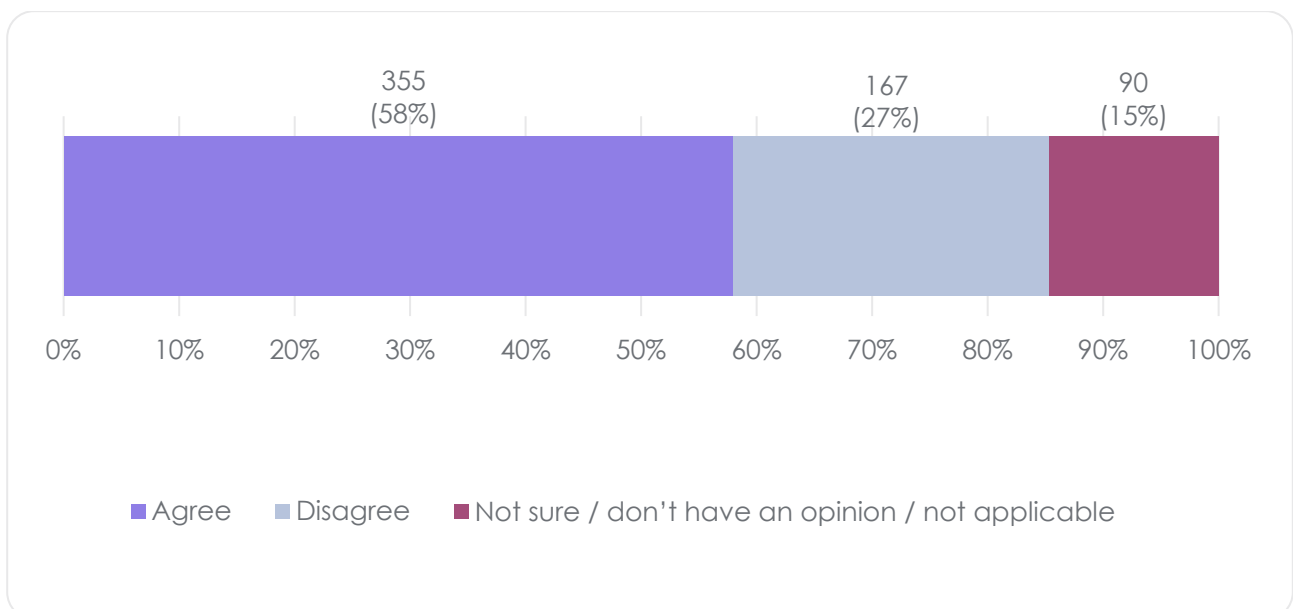


Figure 28 Question 26, (n=612)

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

This question was answered by 301 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Support (general)	8%	1%	21%	2%	0%	6%
Suggestions Other examples	7%	0%	23%	0%	0%	3%
Concern Oppose exemptions	6%	3%	0%	18%	13%	14%
Concern Examples not comprehensive	5%	0%	15%	0%	0%	6%
Suggestions Look for solutions not obstacles	5%	1%	0%	18%	23%	8%

Support

Many respondents express general support for the proposed examples because they feel they cover areas where separate collection may not be technically practicable.

Some respondents support the proposal to include flats and Houses of multiple occupation in the exemptions list as they express concerns that challenges already faced by flats/Houses of multiple occupation could be further exacerbated by source separate collection, particularly in relation to limited outdoor storage space for extra containers.

A few respondents support the proposal to include storage in the list as they would like the potential for existing storage at transfer stations to accommodate source separate collection needs to be considered when assessing if collections are 'technically practicable'.

A few respondents believe the aim should be to achieve high levels of quality recycling and the primary aim should be to achieve Government environmental goals. They think that if some areas believe this would be better achieved through co-mingled collection, this should be allowed.

Concerns

Many respondents express concerns that the proposed list of examples does not justify why any local authorities should be exempt from separate collection. If challenges are faced, respondents feel that authorities should work alongside Extended Producer Responsibility Scheme Administrators to overcome obstacles, rather than being exempt.

For example, some respondents express concerns that the 'rurality and geography' example in the proposal is too broad and does not outline the specific circumstances that would determine if separate collection is 'technically practicable'. Other suggest it would be 'technically practicable' to have separate collection in some rural areas but might be more challenging in urban locations where properties have restricted access due to steps or narrow streets.

Many respondents express general concerns that the proposed list of examples is not exhaustive. They suggest that further examples should be added to the definition of 'technically practicable', but respondents do not specify what is needed.

Some respondents express concerns that the examples identified in the proposal could be treated as permanent barriers to change and they feel this should not be allowed. For example, some respondents suggest that issues related to property type and geography are not new and therefore should have been tackled when current waste management protocols were implemented. These respondents consequently feel local authorities should not be given the opportunity to use concerns about whether separation is 'technically practicable' as a reason to delay the delivery of proposals in this consultation.

Some respondents express concerns that the proposed examples for 'type of housing stock and accessibility' do not include all housing types that may not find separate collection 'technically practicable'. Respondents suggest the following property types are included as examples:

- terraced properties with no back lane;
- armed forces accommodation;
- traveller communities;
- older blocks of flats; and
- properties with no vehicular access.

Some respondents express concerns about the inclusion of the proposed example, 'availability of suitable containers', because respondents feel this is not a valid reason for exemption from separate collection under the definition of 'technically practicable'. Instead, respondents feel this could be a reason for temporarily delaying implementation.

Some respondents express concerns that the following capacity issues were not explicitly listed in the proposed examples of where it may not be 'technically practicable':

- container storage capacity in blocks of flats or terraced housing;
- capacity at depots for additional vehicles;
- capacity of vehicles themselves to accommodate separate collection; and
- capacity at sorting facilities.

Suggestions

Many respondents suggest other circumstances to be included in the proposed examples. These include:

- health and safety issues relating to lifting multiple containers;
- end market availability for all materials;
- houses without frontages; and
- collection vehicles capacity.

Many respondents suggest that none of the proposed examples should be treated as permanent barriers to delivering source separate collection. Respondents suggest these proposed examples are instead obstacles for which solutions should be found.

Some respondents suggest that any standard templates for assessing practicability should have scope to recognise variations within the different types of housing. For example, street level houses in urban areas could have less space for a multi-container recycling system than street level suburban properties.

Some respondents suggest that the issues outlined in the proposed examples could be mitigated and possibly eliminated through investment in infrastructure and engaging with developers at the pre-application stage to ensure appropriate waste management facilities are installed in new builds. Respondents suggest Government provides minimum specifications for waste management facilities for all future developments.

Some respondents, suggest that local authorities should have flexibility to consider their own circumstances when making decisions about collections. However, respondents suggest that factors like availability of suitable containers should not be considered a reasonable permanent exemption under 'technically practicable' but rather a temporary reason for delays to implementation.

14.3. Question 27

14.3.1. What other examples of areas that may mean it is not 'technically practicable' should be considered in this proposal? Please be as specific as possible.

This question was answered by 407 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Other examples of not 'technically practicable' areas Other	13%	1%	39%	4%	0%	8%
Suggestions Other examples of not 'technically practicable' areas Accessibility / types of housing stock	9%	1%	25%	0%	0%	11%

None / no other examples	7%	6%	4%	20%	6%	14%
Suggestions Other examples of not 'technically practicable' areas Inadequate infrastructure / proximity of sites	7%	0%	21%	0%	0%	11%
Concerns Health and safety	6%	0%	21%	0%	0%	0%

Support

Many respondents suggest no other examples to be added to the existing proposed examples of areas that may mean it is not 'technically practicable' to provide source separate collection. This is because they feel the main examples are covered in the proposal.

Concerns

Many respondents express concerns about health and safety issues that may arise from separate collection, making it not 'technically practicable'. Specific examples given include:

- muscular-skeletal injuries from manual handling of multiple containers as opposed to one wheelie bin;
- noise and weight of glass collection boxes;
- increased time at properties to accommodate segregated collections leading to more risks on road as other drivers seek to pass collection vehicles; and
- safety risks from more containers cluttering kerbs/roads.

Many respondents express general concerns about compliance with the requirement to separate recycling. Specifically, they express concerns about the impact of different resident participation levels, even within different areas of a local authority.

Specifically, a few respondents express concerns that persistent contamination by residents of recycling streams could provide another example of separate streams not being 'technically practicable'.

Some respondents express concerns that the exemptions could provide local authorities with an excuse not to participate in the proposed source separate collection. For example, respondents express general concerns relating to fairness and suggest that housing type alone should not determine if separate collection is 'technically practicable'.

Some respondents express general concerns that the proposed examples under the definition of 'technically practicable' lack detail. Respondents express concerns that the impact of Covid-19 and the resulting pandemic have not been considered in the consultation. Respondents suggest residents should be asked their opinion on collections being 'technically practicable'.

Some respondents express concerns for the impact on the local area that increased

source separate collection could have. For example; they feel there could be additional noise from separate glass collections and a potential increase in littering and fly tipping due to more open boxes.

A few respondents express concerns about who will provide any additional funding that could be required to solve issues highlighted by the proposed examples of separate collection not being 'technically practicable'.

A few respondents express concerns for collection inconsistency as a result of exemptions through the proposed 'technically practicable' definition. Respondents think it could be confusing for residents in the same area to have different collection days based on property type.

A few respondents express general concerns about the impact of Extended Producer Responsibility on separate collection. These respondents suggest that the Scheme Administrator should have a clearly defined role in assessing TEEP criteria.

Suggestions

Many respondents suggest a number of examples to be included under the definition of not 'technically practicable'. For example:

- lack of viable end markets for materials;
- the impact of wildlife disturbing open containers of waste, such as foxes and seagulls; and
- impact on existing sorting and treatment contracts.

Many respondents suggest that the proposed criteria for separate collection not being 'technically practicable' should include (as it currently does):

- **'Suitability of outdoor presentation point for containers'** for properties such as flats above shops, houses with no frontages or properties on roads that are narrow or congested, where space to present containers for collection is limited.
- **'Inadequate infrastructure'** such as limited electric vehicles charging points and proximity of recycling destinations for collected materials.
- **'Availability and storage of containers'** where the conditions of a property impact the ability of residents to store separate containers, for example older flatted buildings.
- **'Traffic and road congestion'**, for example, where roads are narrow and collection vehicles could obstruct traffic
- **'Collection vehicle fleet constraints'** such as availability of appropriate vehicles, increased CO₂ emissions from increased collections; as well as limited space at vehicle depots.
- **'Demography of an area'** should also be considered, for example ageing populations or disabled residents that may require assisted collections.

Some respondents suggest that local authorities should be allowed to keep current co-mingled recycling systems where effective recycling capability is already proven.

Some respondents suggest that an existing shortage of drivers could be further compounded by the introduction of more collections. Respondents suggest that a lack of well-trained staff should therefore be added to the proposed examples for separate

collection being considered not 'technically practicable'.

A few respondents suggest that innovation should be explored to overcome any 'technically practicable' issues. For example, development of new container types to assist with handling, and sharing of best practice to overcome storage issues.

A few respondents suggest that recycling systems should be kept simple wherever possible and whilst it may be technically practicable to deliver source segregated collections to a percentage of a local authorities' area, a two-tier recycling system of part co-mingled, part separate collection should be avoided to prioritise ease of use for residents.

A few respondents suggest there should be consistency between collection systems for household and non-household recycling.

A few respondents suggest that none of the proposed examples should be treated as permanent barriers to delivering separate collection. Respondents suggest that the proposed examples are instead obstacles for which solutions should be found.

14.4. Question 28

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

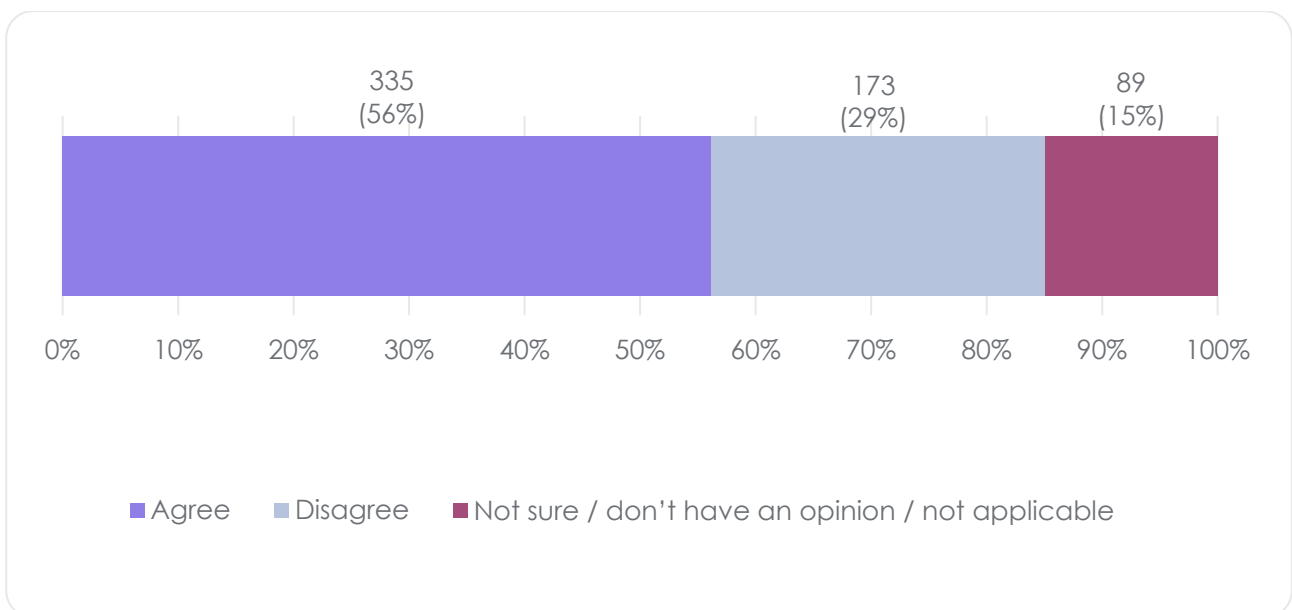


Figure 29 Question 28, (n=597)

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

This question was answered by 272 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and

- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Proposed examples	9%	1%	25%	2%	0%	8%
Concern Examples not comprehensive	8%	1%	24%	0%	0%	11%
Concern Oppose exemptions based on cost	5%	3%	1%	16%	10%	22%
Concern Lack of detail in proposal / definition / terms	4%	0%	9%	0%	0%	11%
Concern Proposed examples Type of housing stock and accessibility	3%	1%	6%	0%	0%	6%

Support

Many respondents express general support for the proposed examples of areas where it may not be 'economically practicable' to deliver separate collection.

Many respondents express general support for a proposal which would see that the greatest amount of waste possible is recycled and is based on environmentally sound reasoning.

Concerns

Many respondents express concerns that the proposed examples of areas where it is not economically practicable to deliver separate collection are not sufficiently comprehensive. They suggest that 'economically practicable' areas should not be limited just to the examples given. Other examples they give include:

- haulage costs;
- operational issues;
- resident engagement; and,
- contract costs.

Many other respondents express opposition to the granting of exemptions based on economic considerations. For example, respondents state that cost has historically been used as a get out card, that TEEP regulations should be curtailed, and that the issue is not about economics but the climate emergency.

Many respondents express varied concerns about a perceived lack of detail in the proposal. Respondents express concerns about the following definitions and terms:

- 'economically practicable';
- 'significantly more expensive';
- 'significantly higher';

- 'efficient and effective service';
- 'excessive costs'; and
- 'specific financial costs'.

Many respondents express concerns with the proposal to exempt the following:

- **Type of housing stock and accessibility.** For example, many respondents disagree that certain building types should be automatically exempt, that student houses are any different to large family households, and that high-rise buildings cannot have separate collections as they believe there are already international examples that demonstrate these properties could be included.
- **Lack of available recycling and treatment infrastructure.** For example, some respondents state that focus should be on developing infrastructure rather than viewing it as a barrier to collection, and that existing sites can be upgraded with policies and incentives.
- **Rurality and geography.** For example, a few respondents believe that all areas are already part of pre-existing collection rounds, and that innovation and remote backhauling could be used for particularly rural locations.

Some respondents express concerns about how local authorities would fund separate collection, for areas where it is not 'economically practicable'. Respondents expressed concerns about whether New Burdens would cover this, and other respondents think that funding mechanisms are untested and opaque.

Some respondents express concerns that the implementation of the Extended Producer Responsibility and/or the deposit return scheme might prevent or distort local authority assessments on collection models.

A few respondents express concerns or disagreement, with all proposed examples of areas where it is not 'economically practicable' to deliver separate collection. Respondents state that these examples should not be viewed as permanent barriers to achieving Government environmental objectives.

A few respondents express concerns that the proposed examples of areas where it is 'not economically practicable' to deliver separate collection, might affect the end material quality or value.

Suggestions

Some respondents suggest that local authorities are supported, to ensure that high quality material and capture rates are maintained. Respondents suggest that Government should underwrite the risks to local authorities.

Some respondents suggest that none of the proposed examples should be treated as permanent barriers to delivering separate collection. Instead, they suggest that the proposed examples are viewed as obstacles for which solutions should be found.

Some respondents suggest that costs arising from areas the proposal identifies as 'not economically practicable', should be covered by Extended Producer Responsibility or New Burdens funding, to ensure that separate collection are delivered. Respondents state that all circumstances should be covered, to ensure the principle that the 'polluter pays'.

Some respondents suggest that whole system costs, from pre-collection to reprocessor, are

considered to discern whether separate collection are 'economically practicable' at a local level, because of significant variations in costs between local authorities.

Some respondents suggest that Government should be clear about the financial modelling and impact on Waste Collection and Waste Disposal Authorities, in order to move forward with the proposal along the proposed implementation timeline.

A few respondents suggest that exemptions to separate collection should only apply in exceptional circumstances. For example, where no other local authority in a similar situation has been able to overcome an issue.

A few respondents suggest that the Extended Producer Responsibility Scheme Administrator should have a clearly defined role, which enables them to pass judgment on how 'economically practicable' is defined locally.

14.5. Question 29

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

This question was answered by 397 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Other examples of 'not economically practicable' areas Collection vehicle fleet constraints	18%	1%	58%	0%	0%	8%
Suggestions Other examples of 'not economically practicable' areas Contracts	15%	0%	50%	2%	0%	8%
Suggestions Other examples of 'not economically practicable' areas Container costs / availability	14%	1%	45%	0%	0%	6%

Suggestions Other examples of 'not economically practicable' areas Inadequate infrastructure	14%	0%	44%	0%	0%	11%
Suggestions Other examples of 'not economically practicable' areas End markets not ready	13%	1%	42%	0%	3%	8%

Support

Some respondents state that the examples of areas where it would not be 'economically practicable' to deliver a separate collection service are comprehensive or say that they have no further examples to add.

Some respondents express support for the proposal's definition of the term 'economically practicable', and for any resulting exemptions of 'not economically practicable' areas.

Some respondents agree with the importance of considering rurality and geography and housing stock. Respondents state that operational costs to local authorities will differ significantly based on types of housing stock, density, and location in relation to disposal / processing facilities, especially if long haul is required.

Concern

Some respondents express a range of concerns about the different financial costs associated with separate collections, and the potential for a funding gap between Extended Producer Responsibility and New Burdens, which might result in areas becoming not economically practicable.

Some respondents express concerns about how 'economically practicable' will be determined in relation to Extended Producer Responsibility scheme or payments and/ or the deposit return scheme. Others express concerns about the effect that Extended Producer Responsibility and the deposit return scheme will have on assessments.

Some respondents express opposition to granting exemptions to areas deemed 'not to be economically practicable'. For example, respondents suggest exemptions based on cost may undermine wider Government objectives, that TEEP regulations should be curtailed, and that separate collections will not outweigh the costs of collection in all market conditions.

A few respondents express a range of concerns about a perceived lack of detail in the proposals relating to:

- cost assessments;
- cost versus carbon benefit assessment;
- the definition of 'economically practicable';
- what constitutes 'excessive';
- a lack of consideration for seasonal demand changes with holiday homes; and

- the justification for exemptions which they believe may undermine Government policy.

A few respondents express general concerns about how payments will be shared between Waste Disposal Authorities and Waste Collection Authorities.

A few respondents express concerns that introducing separate collections will result in confusion and storage issues for the householder, which might prevent participation in recycling.

Suggestion

Respondents suggest that other examples of 'not economically practicable' areas should include areas where the following conditions apply:

- Many respondents suggest exempting areas where **there are collection vehicle fleet constraints**. For example, respondents state that there might be vehicle supply issues, that demand for vehicles might artificially raise prices, that the vehicle fleet should be electric, or hydrogen based only, and that costs associated with increased fleet size should also be considered.
- Many respondents suggest exempting areas where **local authorities will incur costs by changing their contracts**. In particular, where this cost may not be funded through Extended Producer Responsibility or New Burdens. Respondents relate these costs explicitly to collection contracts. Other respondents suggest that contracts for sorting and processing should also be considered, as those agreed through Private Finance Initiatives will prevent local authorities from making cost savings.
- Many respondents suggest **consideration of container costs and availability**. For example, respondents state that there might be container supply issues, that demand for containers might artificially raise prices, that costs of container replacement should be considered, and that costs of supplying extra containers to large households should be considered.
- Many respondents suggest consideration of areas where there is **not adequate infrastructure to run a separate collection service**. For example, respondents state that depot space for vehicle storage, processing technology, the cost of new outlets, transfer station capacity, and where disposal facilities are located should be considered.
- Many respondents suggest exempting areas where there are **not sufficient end markets** for materials. Respondents suggest that the risk of market saturation and devalued recyclate should also be considered.
- Many respondents suggest considering exempting areas where there are **not adequate staffing levels** to run a separate collection service. For example, respondents state that there is already a shortage of drivers, that sourcing staff through agencies will result in paying premiums, and that the wider costs of training crews and ancillary staff should be considered.
- Many respondents suggest consideration of the **initial and ongoing cost of communicating** the scheme to residents.
- Some respondents suggest examples should include those areas where **contamination of waste streams will lead to rejected loads**, resulting in increased

- costs for local authorities.
- Some respondents suggest consideration of **overall system efficiency**. Respondents state that different neighbourhoods may lead to lower levels of system efficiency because particular vehicle types may be required, and express concerns about the associated costs of possessing and maintaining diverse fleets.
- Some respondents make a range of other suggestions about other examples of 'not economically practicable' areas. For example, respondents suggest that some Material Reprocessing Facilities can sort co-mingled collections, that the loss of economies of scale may increase costs for some local authorities, that health and safety considerations for crews and residents should be made, and that the costs of writing off redundant assets or purchasing new licenses/permits should be considered.
- A few respondents suggest consideration of **gate fees, including bulking and haulage**, rather than the modelled average assumptions made in the proposal.
- A few respondents suggest considering areas where **local congestion or emissions charging** schemes will attract charges for local authorities using additional vehicles to run a separate collection service.

A few respondents suggest that the Extended Producer Responsibility administrator should have a clearly defined role, where they can scrutinise TEEP judgements made locally, to ensure that recycling policies deliver the best environmental outcome.

A few respondents suggest that none of the proposed examples of 'not economically practicable' areas should be treated as permanent barriers to delivering separate collections. Respondents suggest that the proposed examples are instead obstacles for which solutions should be found.

A few respondents suggest that residents should be consulted on the costs that will derive from the proposal.

14.6. Question 30

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

This question was answered by 432 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Definition / consultation is unclear / not comprehensive / lack of detail	16%	0%	51%	0%	0%	11%
Suggestions Further consultation required / ask specific stakeholders / support from government	9%	4%	10%	41%	13%	0%
Concerns Financial impact on LA's	8%	0%	27%	0%	0%	3%
Suggestions Apply a set of principles across all LA's	7%	0%	22%	0%	0%	3%
Concerns Relationship with EPR	6%	0%	20%	0%	0%	3%

Concerns

Many respondents express a range of concerns about a perceived lack of detail within the proposal in regard to the term excessive costs and specifically in relation to the following:

- the lack of a definition for excessive costs;
- that excessive costs cannot always be defined in monetary value;
- that what is deemed excessive may vary between local authorities depending on their circumstances; and
- that excessive implies a high threshold, and that there is a lack of detail within the proposal about what evidence is required to demonstrate excessive costs.

Many respondents express concerns that the implication of the phrase 'excessive costs' is that local authorities will have to absorb significant costs above standard before a separate collection service is deemed to be 'not economically practicable'.

Many respondents express concerns about the potential for conflict and disagreement between local authorities, producers, and the Extended Producer Responsibility Scheme Administrator in regard to what constitutes excessive costs. Respondents express some concerns about who would ultimately define and decide excessive costs, and the potential implications for local authorities' local decision-making sovereignty.

Additionally, many respondents express concerns that any assessment of excessive costs will be made inaccurate by the introduction of Extended Producer Responsibility and/or the deposit return scheme.

Some respondents suggest that excessive costs in terms of economic practicality, or any other economic justification, should not be viewed as a legitimate exemption to introducing a separate collection service. Respondents state that the environmental and climate costs to the planet are greater than any monetary costs.

Similarly, a few respondents express concerns that the approach assumes there will be excessive costs. They believe no excessive costs will exist because local authorities will

receive additional funding. Consequently, they do not see this as a valid exemption.

Some respondents express concerns that local authorities may not have the infrastructure or knowledge to effectively model the costs of running a separate collections system. Respondents express concerns about their current local infrastructure, like space at depots. Other respondents express concerns about their ability to summarise what infrastructure would be required to deliver a separate collection service, due to a lack of expertise in estimating participation rates and journey times.

A few respondents express a range of concerns about the delivery of a separate collection service in regard to the following:

- public confusion;
- recycling capture rates;
- emissions levels;
- overall environmental benefit; and
- the assumption separate collections are preferable to co-mingled.

Suggestions

Respondents suggest that the following could be considered 'excessive costs in terms of economic practicability:

- Some respondents suggest that any **increase in operational costs, or investment in infrastructure for a separate collection service**, should be considered. For example, investment in vehicles and containers which have ongoing storage, maintenance and staffing costs, or the replacement of resources, such as fleet and containers, before they have reached end of life.
- Some respondents suggest that **any costs which exceed funding** from New Burdens, funding provided by Government and/or Extended Producer Responsibility payments should constitute excessive costs.
- Some respondents suggest that **any costs which would result in reduced provision**, or which prevent investment in other services like social care, should constitute excessive costs. Equally, respondents suggest that **any costs which may result in charges to local residents** or higher council tax should be considered to be excessive.
- Some respondents suggest that **inefficiencies of having a separate collection service** should be considered. For example, services that yield low material capture rates, or services which require running a high sub fleet of vehicles, or where the end material value does not cover the costs of the recycling process (as outlined above).
- Some respondents suggest that existing contracts and the costs of terminating them for local authorities should be taken into consideration.
- Some respondents make additional suggestions, for example that excessive costs should include the costs of travelling to rural areas, high volume areas where multiple collections are required, and contamination costs when changing collection scheme.

Many respondents suggest that further consultation with businesses, local authority stakeholder groups and industry experts is required to determine what might constitute

excessive costs in terms of economic practicality. Respondents suggest that an assessment should be scrutinised and approved by an external body, and other respondents suggest that Government should engage with bodies to produce guidance.

Many respondents suggest that a set of principles, that allow for local differences, are created, and applied across all local authorities to bring consistency to how excessive costs are determined and applied.

Many respondents suggest that what is deemed excessive will vary for local authorities and suggest decisions are made on a case-by-case basis, based upon the following:

- their size;
- population demographics;
- annual budget;
- local landscape;
- starting point for delivering separate collections; and
- whether it is a single or two-tier authority.

Many respondents suggest that any costs that increase in total net costs, or any increase above the cost of current collection services should constitute excessive costs in terms of economic practicability. Respondents suggest that costs may outweigh benefits if the material recovered from separate collections does not cover the cost.

Many respondents suggest that excessive costs in terms of economic practicability should be determined and decided on by the Extended Producer Responsibility Scheme Administrator. Respondents suggest that the Scheme Administrator should be the sole decision maker. Other respondents suggest that any decisions made by local authorities about excessive costs should have to be approved by the Extended Producer Responsibility Scheme Administrator. However, as seen above, others had concerns about this approach.

Some other respondents suggest that 'excessive costs' should not just focus on collection and should instead capture costs from the entire recycling services process, from pre-collection to reprocessing.

Some respondents make a range of suggestions about how excessive costs should be mathematically calculated. For example, twice the average estimated variable cost of collection, 20% higher than the average cost per household, as a proportion or percentage increase, or various other proposed calculations.

Some respondents suggest that the costs of a separate collection service should be compared to alternative costs, including, but not limited to:

- financial value of material collected;
- costs in comparison to current service per household;
- impact on the recycling rate; and
- carbon benefits in comparison to comingled collections.

A few respondents suggest that, for consistency reasons, it is important for all local authorities to run a separate collection service and they suggest that funding should be made available to overcome financial barriers and local circumstances. Respondents suggest that careful route planning or having less frequent collections could also assist

with keeping costs reasonable.

A few respondents make several other suggestions about how excessive costs should be determined. For example, that there should be a nationwide solution, that long term costs should be the focus, that a cap and collar for costs could be introduced, and that impact on profits for contractors should be considered.

14.7. Question 31

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

This question was answered by 428 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Further consultation needed / ask specific stakeholders	11%	0%	36%	2%	3%	6%
Suggestions 'Significant' environmental benefits Any negative environmental impact	10%	1%	27%	2%	0%	17%
Concerns Financial costs	8%	0%	25%	0%	0%	3%
Suggestions 'Significant' environmental benefits Impact on carbon emissions	8%	2%	21%	0%	0%	8%
Suggestions 'Significant' environmental benefits Impact on % recycling collected / residual waste produced	7%	2%	21%	0%	0%	3%

Support

Some respondents agree that the introduction of a separate collection service could result in negative environmental impacts as a result of increased fleet size. For example, they thought it might increase carbon emissions, increase air pollution, increase

congestion, and reduce air quality. Respondents express concerns that there will be no environmental benefit to separate collections unless all collection vehicles are made electric.

Concerns

Many respondents express concerns about a perceived lack of detail about what would be considered 'significant', specifically they suggest further consultation might be required in relation to the following:

- the lack of a definition for 'significant';
- that 'significant' implies a high threshold;
- that what is deemed 'significant' will vary based on local authorities' circumstances and will need to be decided on a case-by-case basis; and
- that the proposal lacks detail on who is to determine what is 'significant'.

Many respondents express concerns that public funds are scarce and introducing a separate collection service will create further financial burdens to local authorities. Respondents question whether public funds should be used to achieve environmental targets, and other respondents question whether Government or New Burdens funding will cover increased costs.

A few respondents express concerns that local authorities could use a judgement of 'no significant environmental benefit' as a loophole to avoid implementing new recycling initiatives. Respondents believe that this would go against the spirit of the proposals. Respondents state that environmental benefit assessments are complex, and that to be effective overall, a collection service needs to be consistent across the country even if this means that in some local areas there is no significant environmental benefit.

A few respondents express a range of concerns about having a separate collection service including:

- the value of recyclate processed in single stream versus co-mingled;
- the contamination rate in a separate collection service; and
- the assumption that a co-mingled service is less efficient than a separate collection service.

A few respondents express concerns about the delivery of a separate collection service and state that decisions should be made on environmentally and economically sound grounds. Respondents state outcomes should be based on cost-efficiency indices set by Extended Producer Responsibility, that costs should be covered by Extended Producer Responsibility payments, and that what constitutes 'significant' should be decided by the Service Administrator.

Suggestions

Many respondents suggest that any negative environmental impact should be considered to be 'significant' in cases where separate collections provide 'no significant environmental benefit' over the collection of recyclable waste streams together. Respondents state that several of the top performing recycling local authorities in England run a co-mingled service. Respondents suggest a negative environmental impact can result from:

- a decrease in the tonnage of recycling collected;
- reduced air quality;
- increased noise pollution; and
- no significant improvement in recycle quality.

Many respondents suggest that any calculation of significant environmental benefit should consider the following factors:

- The **impact on recycling rates**. For example, many respondents suggest that where a local authority can demonstrate increased recycling rates through a co-mingled system, as opposed to a source separated collection.
- The **quality of collected material** should be considered as the capabilities of sorting and processing facilities depend upon this, as do the availability of end markets.
- **Operational readiness of local authorities' infrastructure** should be considered. For example, established infrastructure to process waste within a locality, storage capacity for containers and bins, and the environmental cost of materials recovery facility sorting. However, respondents state that lack of infrastructure should not be seen as a barrier to a separate collection service, but rather it is an area where investment is required.

Some respondents suggest that whether the environmental benefit is 'significant' should be decided by the Extended Producer Responsibility Scheme Administrator. As outlined above for evaluating technical and economically practical considerations. Respondents also suggest that the Scheme Administrator should be the sole decision maker. Similarly, other respondents suggest that any decisions made by local authorities relating to 'no significant environmental benefit' should have to be approved by the Extended Producer Responsibility Scheme Administrator.

Some respondents suggest that clear and consistent guidance is needed to determine what is 'significant'. Respondents suggest that quantifiable or measurable determinants of 'significant' are introduced, while other respondents suggest that robust guidance is needed to ensure consistency in application across local authorities.

A few respondents make varied suggestions about how 'significant' should be mathematically calculated. For example, a 25%+ improvement in greenhouse gas emissions, 20% reduction in baseline carbon measurements, per tonne emissions reports, and several other proposed calculations related to carbon impacts.

A few respondents suggest that local authorities should have the freedom and flexibility to decide what type of recycling service to offer, based on consideration of their local circumstances and an assessment of where there would be the most significant environmental benefit.

A few respondents suggest that different assessments are needed to determine what is 'significant'. For example, respondents suggest that qualitative assessments are required, that trade-off assessments are required, and that assessments must occur on a case-by-case basis to ensure that typical assumptions do not overlook the environmental merits of individual projects or collection streams.

14.8. Question 32

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

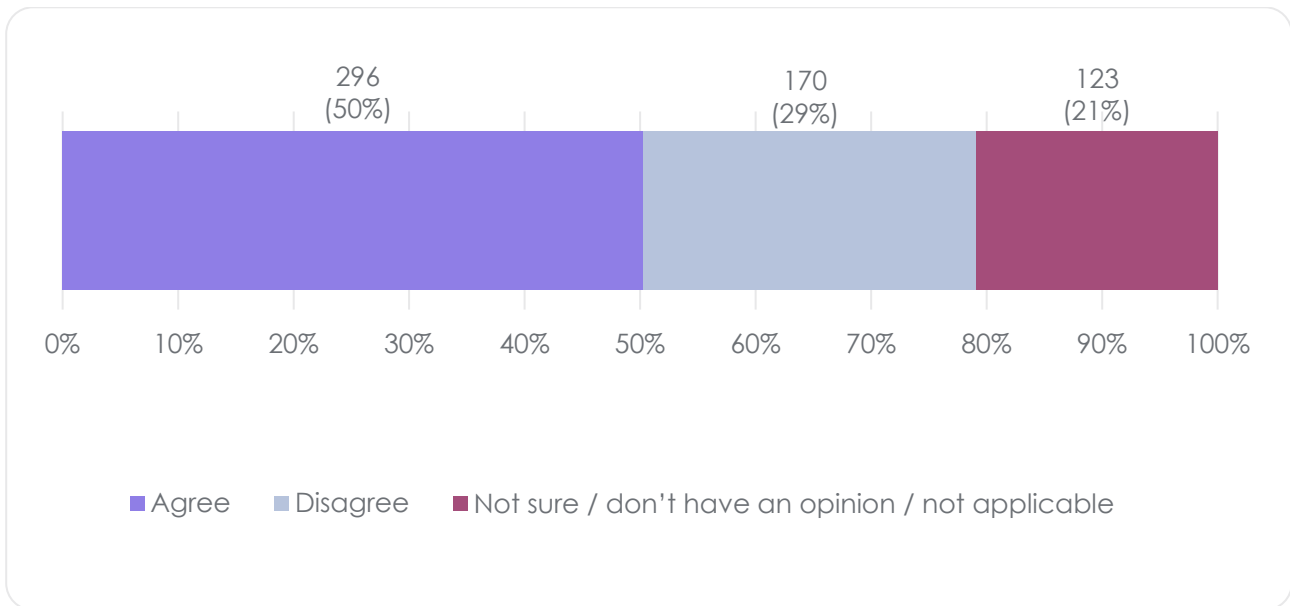


Figure 30 Question 32, (n=589)

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

This question was answered by 263 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Agree with examples (general)	9%	0%	29%	0%	0%	8%
Concerns List of examples limited / not comprehensive	6%	0%	19%	0%	0%	11%
Concerns Relationship to EPR	5%	4%	0%	24%	16%	3%
Concerns 'Significant' not defined	4%	3%	4%	16%	0%	0%

Suggestions Focus on carbon emissions	4%	0%	10%	0%	0%	3%
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Support

Many respondents agree that the proposed examples for no significant environmental benefit are appropriate.

Many respondents agree that carbon emission levels should be considered. They state that haulage and travel distance between collection, treatment and disposal facilities are relevant to any environmental assessments of a separate collection service.

A few respondents express support for the proposal's assertion that local authorities will need to demonstrate there is no significant environmental benefit to a separate collection service within their area. Respondents state that local authorities should be able to retain some flexibility in decision making in regard to the implementation of new technology for collection, sorting, and recycling of waste.

Concerns

Many respondents express concerns with the proposed as they believe the list of examples is currently too limited and does not provide an exhaustive account of circumstances in which there might not be a significant environmental benefit.

Many respondents suggest that the Extended Producer Responsibility Scheme Administrator should decide what constitutes no significant environmental benefit. Respondents state that the Extended Producer Responsibility Scheme Administrator must have a statutory remit to ensure environmental objectives are met. Other respondents suggest that the Extended Producer Responsibility Scheme Administrator should oversee how local authorities apply 'no significant benefit'.

Many respondents express concerns about a perceived lack of detail in regard to what would be considered 'significant' and in relation to the following:

- the lack of a definition for 'significant';
- that the proposal lacks detail on who is to determine what is 'significant';
- that is not clear what factors are considered in an overall assessment of 'no significant environmental benefit'.

Many respondents express several further concerns about the proposal in regard to the following:

- that 'no significant environmental benefit' might be determined solely by local authorities, with other stakeholders not being able to influence decisions;
- that long term environmental impact has not been considered;
- that Government has not been clear about what would be required to result in a change in collection method;
- that Government has not been clear about what factor(s) would take priority in assessments of 'no significant environmental benefit'; and
- that data is missing from the proposal.

Some respondents express concerns about how 'no significant environmental benefit'

might be measured and assessed. Respondents express concerns about consistency, or state that one standardised metric should be used. Other respondents express concerns that environmental benefit is hard to calculate or cannot be measured through a single indicator. Respondents express concerns about a lack of methodological detail for measuring 'no significant environmental benefit' within the proposal.

Some respondents express concerns that 'no significant environmental benefit' could be used as a 'get out clause' to avoid achieving Government environmental objectives. These respondents state that they are opposed to exemptions, and that the examples in the proposal should not be considered as permanent or semi-permanent barriers to system change.

Similarly, some respondents express concerns about the proposal to include reject tonnages as an example for 'no significant environmental benefit'. Respondents state that reject tonnages can be an indication of where improvement is needed, that reject tonnages indicate high quality and thorough sorting, and that reject tonnages might be expected to increase alongside an increase in capture rates.

A few respondents express concerns about the inclusion of the availability of recycling facilities in the list. For example, respondents state that recycling facilities should be prioritised within local authority spending. Also, they believe the rationale of the Consistency and Extended Producer Responsibility consultations is to help underpin new collection and sorting infrastructure, so think that lack of facilities should not be an excuse.

A few respondents express general concerns with all the proposed examples for 'no significant environmental benefit'.

Suggestion

Many respondents suggest that whole system impacts should be considered when measuring 'no significant environmental benefit', and that these assessments should involve the whole value chain. For example, respondents state that environmental benefits occur in various places within the system that no one single body or authority can recognise, so all perspectives within the chain should be considered.

Some respondents suggest that further consultation on what is considered to constitute 'no significant environmental benefit' should occur, and that businesses and industry producers should assist local authorities in determining what this means.

A few respondents suggest that Government environmental criteria should be applied in a way which does not stifle any future innovations into recycling technology, in order to future proof a comprehensive recycling system.

A few respondents suggest that some local authorities will experience difficulties in modelling the environmental impact of a source separate collection service due to a lack of resources, data, and expertise. They suggest that Government should support local authorities where appropriate to enable them to undertake such an assessment.

14.9. Question 33

14.9.1. What other examples of 'no significant environmental benefit' should be included in this proposal? Please be as specific as possible.

This question was answered by 389 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Other examples Impact on carbon emissions	15%	0%	49%	0%	0%	8%
Suggestions Other examples Vehicles	12%	1%	39%	0%	0%	6%
Suggestions Other examples Quality of materials collected / end material	11%	0%	36%	0%	0%	6%
None / no other examples	6%	4%	5%	14%	16%	14%
Suggestions Other examples Local air quality / traffic	5%	0%	15%	0%	0%	6%

Support

Many respondents suggest no other examples of 'no significant environmental benefit' should be included in this proposal.

Many respondents generally agree that carbon impact should be included in the proposal as an example contributing to 'no significant environmental benefit'.

Concerns

Some respondents express concerns about providing local authorities any reason to claim exemption from source separated collections because they feel any issues raised should be treated as challenges to overcome rather than obstacles to avoid. Respondents express support for working towards Government's larger environment goals and expressed concerns that exemptions might detract from this.

A few respondents express general concerns about the consultation encouraging the scope of TEEP criteria to be widened further than is already proposed.

A few respondents express concerns that the proposed service changes are unclear and suggest further guidance on proposed statutory requirements is needed before they can comment.

A few respondents also express general concerns about how all aspects of TEEP will work together to judge overall practicability of source separated collections.

A few respondents suggest that in line with the introduction of Extended Producer Responsibility, a new approach for a new system is needed. Therefore, respondents suggest the Extended Producer Responsibility Scheme Administrator should have a clearly defined role in assessing TEEP criteria.

Suggestions

Many respondents make suggestions for additional examples that should be included as considerations in a case for 'no significant environmental benefit'. These include:

- The impact of **additional vehicles that are required** to provide separate collections. This is because respondents express concerns that source separated collections may provide little or no increase in material quality.
- Overall **quality of materials collected**, because respondents express concerns that source separated collections may provide little or no increase in material quality.
- Any **impacts on air quality** from diesel-powered LGVs/HGVs due to increased and/or slower collections as a result of source separated collections.
- Any areas where **source separated collections provide no significant improvements** in recycling performance over current co-mingled systems.
- Any **environmental impacts of implementing necessary infrastructure** to make source separated collections work should be included. However, respondents express concerns that environmental criteria should be applied in a way that does not prevent any future recycling or sorting innovations.
- Respondents express concerns about the **possibility of increased litter** because of additional containers/sacks/boxes. In particular, they express concerns about the proposed unlidded containers and the potential for waste being scattered by wind and/or animals.
- **Resident participation** should be included because changes to household recycling could impact ease of use for residents and as a result overall material capture rates. Respondents suggest there should be realistic modelling of participation rates to judge the environmental benefit of proposed separated collections.
- The **carbon impact of withdrawing current co-mingled infrastructure** such as collection vehicles and containers which may need to be replaced with new infrastructure for a source separated system.
- Any **developments in sorting technologies** that allow for increased material quality without the need for source separated collections should be considered.
- The **types of treatment technology available** to local authorities should be considered. For example, respondents suggest access to 'dry AD' may allow co-collection of food and garden waste, therefore reducing overall carbon impacts.
- Respondents suggest that **health and safety** should be included in the proposal as an example of 'no significant environmental benefit'.
- The **proximity of local authorities to the necessary sorting/reprocessing/disposal sites** and any additional fuel required to travel increased distances should be

included.

- Respondents also suggest that **littering and spillage** of waste as well as yield of recyclable materials should be included as potential examples.

Some respondents suggest source separated collections would require additional vehicles on the road to collect broadly the same amount of materials. They therefore believe the proposal could increase carbon emissions without an overall gain in material quality.

Equally, a few respondents express concerns that source separated collection could result in higher carbon emissions than twin stream collection because more vehicles could be required to deliver the same level of service.

A few respondents suggest assessments of 'no significant environmental benefit' should consider the potential impacts of the whole value chain, rather than focusing on isolated sections of the life cycle of a product.

A few respondents suggest a standard metric to measure environmental impacts would be useful to determine what significant means. Others suggest there is need for a tool to measure carbon emissions and overall environmental impacts to efficiently judge whether co-mingled or source separated collections would be most environmentally beneficial.

A few respondents suggest fibre-based materials with heavy food contamination should be collected for composting where recycling through a paper mill is no longer appropriate.

15. Proposal 12: Compliance and enforcement

15.1. Question 34

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

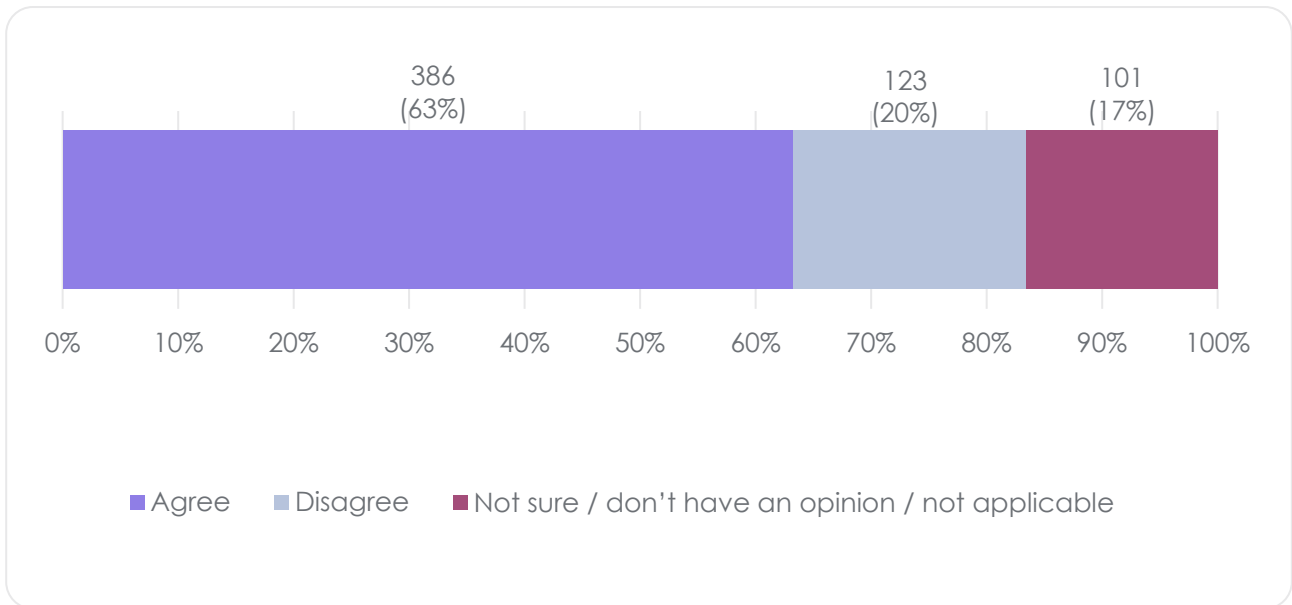


Figure 31 Question 34, (n=610)

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

This question was answered by 243 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Single written assessment	7%	0%	20%	0%	0%	6%
Support Support single assessment including for multiple authorities where circumstances make it appropriate	4%	0%	14%	0%	0%	3%
Suggestions Joint/shared assessments	4%	0%	12%	0%	0%	0%

Concerns Lack of detail in proposal	3%	0%	9%	0%	3%	0%
Suggestions Follow-up data from local authorities / require more detail	3%	2%	6%	0%	3%	6%

Support

Many respondents express support for single written assessments on the basis that they would lessen administrative burdens and maximise efficiency.

Many respondents also express support for sharing single assessments between local authorities under appropriate circumstances.

Some respondents express support for written assessments because they provide an opportunity to maximise the likelihood of meeting Government objectives.

Some respondents express support for written assessments with the caveat that an exemption warranted by circumstances in one particular area within a local authority should not apply to the local authority as a whole and that there should be input from both the packaging value chain and the Extended Producer Responsibility Scheme Administrator.

Concerns

Many respondents express concerns about the lack of detail in the current proposal. Respondents seek clarity on:

- how the written exemptions will be assessed;
- who will assess the written exemptions;
- whether sufficient resources are available;
- how waste disposal or HWRC implications will be reflected;
- how 'service area' will be defined; and
- the proposed system's relationship with Extended Producer Responsibility.

Many respondents express concerns that single assessments might undermine the purpose of the proposals as they may give local authorities scope to excuse themselves from adhering to them. In turn, this could have a negative impact on both recycling rates and consistency.

Some respondents feel that a single assessment for a whole local authority would be inadequate since it would fail to comprehensively cover the multiple variables in a service area (such as housing types and densities and population demographics) and as such would mask individual issues across these areas. Respondents feel that to maximise waste separation, exemptions should only apply to the specific area in which they are relevant, rather than to the whole local authority. They also highlight the need for effective enforcement measures.

Many respondents feel that the proposals are addressed from the wrong perspective, stating that instead of considering these assessments as a burden, they should be seen as a valuable opportunity to improve recycling services and environmental outcomes. As such, respondents feel that the proposal should encourage local authorities to take

advantage of these opportunities rather than facilitating their avoidance.

Some respondents express their opposition to the exemptions outlined in the proposals, stating that legitimate reasons for exemption would be few and far between, and, as such, they would warrant in-depth investigation and analysis. Otherwise, respondents feel that the system should be solutions-focused with the bar set high so as not to create a barrier for necessary change.

Some respondents express concerns regarding the apparent lack of accountability in the proposed assessments. Respondents feel that the proposed system would be self-assessed and infrequently inspected, leaving it open to abuse and non-compliance. Respondents suggest that to combat this, there should be independent audits and outside scrutiny to ensure that local authorities are held accountable.

A few respondents disagree with Government's stance on service configuration, asking why the principle of consistency is being applied to collection methods, when historically it has instead been applied to the range of materials collected.

A few respondents feel that having only one written assessment for a whole local authority could lead to specific issues being overlooked.

Suggestions

Many respondents agree with the proposal for a system of joint or shared assessments where appropriate. They suggest that examples of appropriate cases include:

- authorities that share the same infrastructure;
- authorities that face the same issues; and
- authorities that have joint contracts or partnerships in place.

Many respondents suggest that Government should provide clear and unambiguous guidance on how to complete assessments and about what evidence is required. They suggest this is followed up with cross-checking and human-follow ups upon their completion, ensuring that exemptions are warranted and that the justifications are clearly evidenced.

Some respondents suggest that, in the interests of consistency, assessments must be thoroughly reviewed both initially and then periodically. Respondents feel that written assessments should be provided for specific areas within local authorities (rather than for local authorities as a whole) and that they should be reviewed regularly to ensure that the content of the assessments remains relevant and thus that exemptions are still justified. Respondents feel that if exemptions are granted for a limited time only, and with the expectation that local authorities will work towards tackling the issues raised, this might incentivise the improvement of services and subsequently, better environmental outcomes.

A few respondents suggest that Government's preferred approach regarding waste collection should be specified in law and in regulations, and that any exemptions to this approach should be granted only through a robust system wherein individual cases are verified by independent bodies.

A few respondents suggest that the Extended Producer Responsibility Scheme Administrator could play an important role in overseeing and challenging the use of TEEP

at a local level, in alignment with the needs of EPR and in pursuance of the best environmental outcomes.

A few respondents feel that unilateral TEEP assessments by local authorities should be abandoned, and that instead, a 'value chain approach' should be adopted, involving the Extended Producer Responsibility Scheme Administrator and, possibly, Extended Producer Responsibility obligated producers.

A few respondents suggest that if the proposed system is to be implemented, Government must be prepared to properly invest in its execution, monitoring, and enforcement. To evidence this point, respondents point out the apparent failure of the TEEP process, which in their view did not achieve its purpose due to the Environment Agency's apparent lack of resources (in terms of skill set and operational capacity).

15.2. Question 35

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

This question was answered by 402 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Funding	10%	0%	35%	0%	0%	0%
Support As long as not too restrictive / LAs get support	8%	0%	27%	0%	0%	3%
Suggestions Clear and regulated guidance needed	8%	1%	23%	4%	0%	3%
Suggestions Standardise assessments	8%	2%	23%	0%	0%	3%
Support Support single written assessment where the services are aligned enough	6%	0%	19%	0%	0%	6%

Support

Many respondents support the use of the proposed templates as long they are not overly restrictive, suggesting that Defra and WRAP could work with local authorities when designing them to ensure this is not the case. Respondents also suggest that guidance and examples to support templates could also be provided on the basis that this would be helpful for local authorities while also helping to achieve consistency.

Many respondents state that when TEEP requirements were first introduced, there was a lack of guidance and support for local authorities until the 'Route Map' was created to assist them in their decision making. Respondents agree that this original Route Map could be updated and then utilised in the implementation of future guidance for the new TEEP requirements proposed.

Many respondents expressed concerns about an apparent lack of detail in the proposals regarding the exact requirements of the written assessments. However, they state their agreement with shared single assessments for partnerships and two-tier authorities. They also express support for the proposal for partnership areas to share a single written assessment where services are sufficiently aligned to justify it.

Some respondents also support the propositions to collaborate with WRAP and to update the WRAP assessment tool.

Some respondents agree with the proposal's suggestion that local authorities should be allowed to work together and collaborate on a single, shared written assessment where there is shared infrastructure, a partnership or where an authority operates under a two-tier system.

A few respondents express support for single assessments, agreeing that these would help to reduce the burden on local authorities and that they could offer an opportunity to improve services and help to meet Government objectives. Respondents emphasise their view that written assessments should not be considered a burden.

Concerns

Many respondents have no further suggestions for exemptions and suggest that opportunities for exemptions should in fact be minimised, expressing concerns about the proposal's apparent emphasis on burdens rather than opportunities.

Some respondents suggest that there could be specific cases in which exemptions could be granted without the need for a written assessment. They therefore request some flexibility in the assessment process. Examples of such exemptions which respondents suggest include:

- certain materials such as paper, card, and metals;
- certain property types wherein residents may require leniency, such as temporary accommodation for homeless people, drug rehabilitation centres or accommodation for those fleeing domestic abuse; and
- situations where specific criteria are proven to be met that demonstrate that recycling standards are already high.

A few respondents seek further information on the approval process for TEEP assessments since they express concerns that the compliance and enforcement approach outlined in

the proposal may expose local authorities to judicial reviews. Respondents also express concerns that this potential threat of judicial review may hinder service areas' ability to progress with contracts and solutions in cases where assessments may be left unreviewed, thus causing uncertainty.

A few respondents express concerns and disappointment that the proposal seems to focus heavily on burdens rather than on opportunities. Respondents stress their view that these proposals should instead be seen as an opportunity to create better systems and to 'catch up' with the top recycling nations.

Similarly, a few respondents suggest a more solutions-oriented approach would be beneficial for the proposal's objectives to be achieved. Respondents feel that approaching the subject from a negative perspective may hinder progress.

Suggestions

Many respondents suggest that there should be clear instructions and consistency with regard to the written assessment process. Respondents suggest that examples and sample assessments could be provided alongside the proposed templates. They also ask that local authorities be provided with clear guidance, tools and throughout the process. This should provide clarity on:

- the criteria for written assessments;
- how to complete them; and
- on the compliance and enforcement process. For example, WRAP's assessment tool and/or a support helpline could assist in completing assessments.

Many respondents suggest the use of a standardised template for ease and consistency. Respondents suggest that these could be based on the updated Route Map and propose that certain data and tools could be provided to ensure that local authorities are operating on the same information, for example conversion parameters and a CO2 assessment tool.

Many respondents suggest that single assessments could be submitted on behalf of multiple parties, with one party writing the assessment and the rest co-signing and confirming that they are satisfied with its contents.

Some respondents suggest that since written assessments are a new requirement, and therefore a new financial burden on local authorities, Government must provide additional funding to cover any costs incurred for the additional resources needed to fulfil this requirement.

Some respondents also suggest that the information gathered in the making of this consultation could be of use if made available to local authorities.

Some respondents suggest that local authorities should be allowed to decide their own affairs, given that they may be best placed to decide what approach works best for local people. Respondents feel that any templates provided for written assessments must be flexible enough to allow local authorities to accurately capture the unique area in which they operate, with respondents calling for an appeals process for instances of disagreement.

Some respondents suggest that Government should work with and consult various

stakeholders when implementing the written assessments. Respondents feel that local authorities would have valuable input in designing templates and suggest that the process implemented should be robustly tested and consulted upon, and that it should be supported by the regulator and in law.

Specifically, a few respondents suggest that further expertise should be sought from independent bodies, such as Regional Environmental Officers who have in-depth knowledge of certain areas and the issues they face. Respondents also suggest that the Extended Producer Responsibility Scheme Administrator should be involved, as well as Waste Disposal Authorities, proposing that any independent expertise should be fully funded by Government.

Some respondents suggest that written assessments must be made as simple as possible, both in content and in timing. Respondents feel that the format of written assessments should be clear and concise, that the process should be easy to follow and that assessments should be carried out when existing contractual arrangements are due to be renewed. Respondents suggest the simplification of the existing TEEP Route Map and suggest that the written assessment could include 'tick boxes' rather than open text.

Some respondents suggest that written assessments should be implemented as soon as possible to align with other relevant proposals (deposit return scheme, Extended Producer Responsibility and Consistency in Household and Business Recycling). They suggest these proposals will result in many changes to implement, so local authorities will need to make decisions sooner rather than later. Once in place, assessments should be reviewed and agreed (or rejected) in a timely manner, after which they should be applicable for a suitable length of time.

Some respondents suggest that since the aim of written assessments is to justify non-compliance, no efforts should be made to reduce the burden and that the onus should be on local authorities to successfully prove that the exemption sought is warranted (rather than on the regulator to disprove it). Respondents suggest that exemptions should be granted on a national level and that waste management should be centralised.

A few respondents suggest that written assessments should be done online and that the electronic form should be simple, with minimal opportunities for free text. Respondents suggest that instructions and guidance could be provided online alongside the form and that there could be the potential for an instant answer if such a tool could be implemented.

A few respondents suggest that timescales and processes should be decided with deposit return scheme and Extended Producer Responsibility in mind, suggesting deposit return scheme could be delayed until the impacts of Extended Producer Responsibility and Waste Collections Consistency can be properly assessed. Respondents point out that under the proposed Extended Producer Responsibility, producers would be paying the full net cost for packaging, and as such, local authorities would not be burdened with the cost of these materials. Respondents suggest that the Extended Producer Responsibility Scheme Administrator would be best placed to determine cost/benefit practicalities.

15.3. Question 36

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

This question was answered by 405 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Factors Infrastructure	18%	1%	57%	0%	0%	17%
Suggestions Factors Financial Cost	16%	2%	47%	4%	0%	14%
Suggestions Factors Contracts	15%	2%	47%	0%	0%	11%
Suggestions Factors Geography	15%	2%	45%	2%	0%	6%
Suggestions Factors Public acceptance/communications	13%	1%	40%	0%	0%	3%

Support

Some respondents express support for the inclusion of the factors cited in the question.

Many respondents agree with the proposal that existing contractual arrangements must be considered, given the costs associated with breaking them or amending them.

Many respondents agree that housing types and density should be considered as part of written assessments, considering the proportion of flats and houses of multiple occupation in the overall housing stock as well as the availability of gardens and storage space, and general accessibility.

Concern

A few respondents express concerns regarding the exemptions proposed, commenting that opportunities for exemption should instead be kept to a minimum in pursuance of a

circular economy for materials, improved recycling rates and greater consistency.

A few respondents express concerns regarding the general concept of affording exemptions and by extension they disagree with the need for written assessments. Respondents give their view that the focus should be on finding solutions for any challenges faced, rather than providing exemptions. Respondents feel that since local authorities will receive funding through Extended Producer Responsibility, they have a responsibility to ensure the separate collection of materials.

A few respondents feel that they do not have the necessary knowledge to provide comment.

A few respondents express concerns regarding the proposed changes since they feel that the current recycling system is already effective, with successful co-mingling schemes in place, high capture rates and simplicity of use. As such, they oppose costly changes to the recycling system that in their view would not give taxpayers better value for money.

Suggestion

Many respondents suggest that infrastructure is an important factor to consider, including (but not limited to):

- access to and capacity of treatment facilities/depots;
- planning applications for additional infrastructure;
- storage capacity at residences;
- vehicle requirements; and
- the transport network.

Many respondents suggest that there is a need to consider all potential financial costs, such as any costs involved in planning and implementation and all operational costs thereafter.

Many respondents suggest that the geography of an area should be considered, (including area size, topography, rurality, and urbanisation) since they feel that this affects:

- access and distance to sorting facilities;
- the transport network;
- the distance to end markets and subsequent haulage costs;
- housing stock; and
- labour costs.

Many respondents suggest that since residents will be affected by the measures outlined in the consultation, their opinions must be sought and considered. Respondents highlight the need to consider public engagement, participation, and willingness to accept change, as well as the costs associated with gathering this information.

Many respondents suggest the inclusion of demographics in the list of factors, highlighting the need to consider the economic and social demographics of an area. Some examples given include areas which have a high population density, a large number of students, or high levels of deprivation, since these can all affect recycling performance. Respondents also suggest that socio-economic factors should be considered, such as levels of deprivation.

Many respondents suggest that environmental issues are a key factor to consider as part of written assessments, for example the levels of carbon emissions, greenhouse gas emissions and air quality.

Many respondents suggest that health and safety should be a factor in assessments since they feel that the proposals outlined would involve increased manual handling for crews, as well as increased risks to residents. Respondents highlight the need to consider the heaviness and high level of noise associated with the collection of glass in particular, and the need to undertake route risk assessments for a kerbside sort. Respondents agree that the quality of recycling is important but feel that it should not come at the expense of personal safety.

Many respondents suggest the need to consider indoor and outdoor storage space (particularly in the case of flats/houses of multiple occupation) and the impact of multi-stream collection systems on the street scene. Respondents feel that some residents may not have the additional space required for extra containers and that having multiple containers outside might negatively impact the aesthetics of an area, as well as causing an obstruction to pedestrians, including wheelchair/mobility scooter users and those with prams.

Some respondents suggest that the availability and cost of additional collection vehicles should be taken into consideration in the written assessments. Respondents suggest the use of a carbon analysis tool in order to evaluate the environmental impact of increased vehicles for collections. Respondents also point out the potential need for additional electrical vehicle charging points.

Some respondents suggest that an important factor to consider in the written assessments is the availability of end markets and their maturity.

Some respondents suggest that written assessments should take into consideration the impacts of Extended Producer Responsibility and the deposit return scheme in order to be comprehensive, with some respondents suggesting that these assessments will therefore need to be completed after both systems have been implemented and their impacts assessed. Respondents suggest that the Extended Producer Responsibility Scheme Administrator should be involved in the written assessment process.

Some respondents suggest that traffic and transport issues are important to consider in proposals, including:

- access issues caused by narrow roads and resident parking;
- the distance that fleets will need to travel and the time it takes; and
- the impact of additional vehicles on local traffic and congestion.

Some respondents suggest that local authorities' current performance should be considered in written assessments, as well as the possibility of using cross-border facilities. Respondents also suggest that there should be clarity on where the assessment begins and ends, for example in instances where the final destination of materials may be abroad or in a different local authority. Respondents comment that there could be a UK-wide database used to share knowledge across local authorities and incentivise solutions.

Some respondents suggest that instead of unilateral TEEP assessments, there should be an

alternative approach adopted which takes into consideration the value chain as a whole. Respondents feel that assessments based solely on the local authority's perspective would not be comprehensive and would fail to cover certain factors such as the environmental impact of the proposals. Respondents suggest that assessments could also be developed with input from the Scheme Administrator to combat this potential oversight.

Some respondents suggest that permitting restrictions, licensing and maintenance should be factors to consider, as well as the costs and logistics of supplying multiple containers and the effects of high vehicle demand on market prices and waiting times. Additionally, respondents point out that an increase in material quantity might saturate the market and negatively impact prices.

Some respondents suggest that only long-term factors (population density and housing stock, for example) should be considered, given that short-term issues can be amended relatively quickly and facilitated by Extended Producer Responsibility. Respondents comment that the latter should be seen as challenges to overcome rather than as grounds for exemption. Respondents suggest that there should be a focus on developing new recycling and treatment infrastructure and that this particular issue should therefore not be a factor to consider in written assessments.

A few respondents suggest that local authorities should have flexibility in determining local affairs. Respondents support this view by pointing out that factors to consider in written assessments will vary over time and from area to area, and that local authorities will need to be afforded sufficient flexibility to reflect this.

A few respondents suggest that factors relating to staffing and skillset need to be considered, for example the fact that additional vehicles will require the recruitment of additional staff (of which there is an apparent shortage) and that new staff will need to be adequately trained. Respondents comment that the local job market should be considered since some areas will find it easier than others to recruit new staff.

A few respondents suggest that the role of the Extended Producer Responsibility Scheme Administrator should be significant and clearly defined, with some respondents suggesting that TEEP assessments should be abandoned altogether and that instead there should be a value chain approach involving the Scheme Administrator, as mentioned in question 34.

A few respondents feel that consistency across household and business recycling is an important factor to consider in the written assessment, commenting that proper investment in local authorities and waste management facilities is key.

15.4. Question 37

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

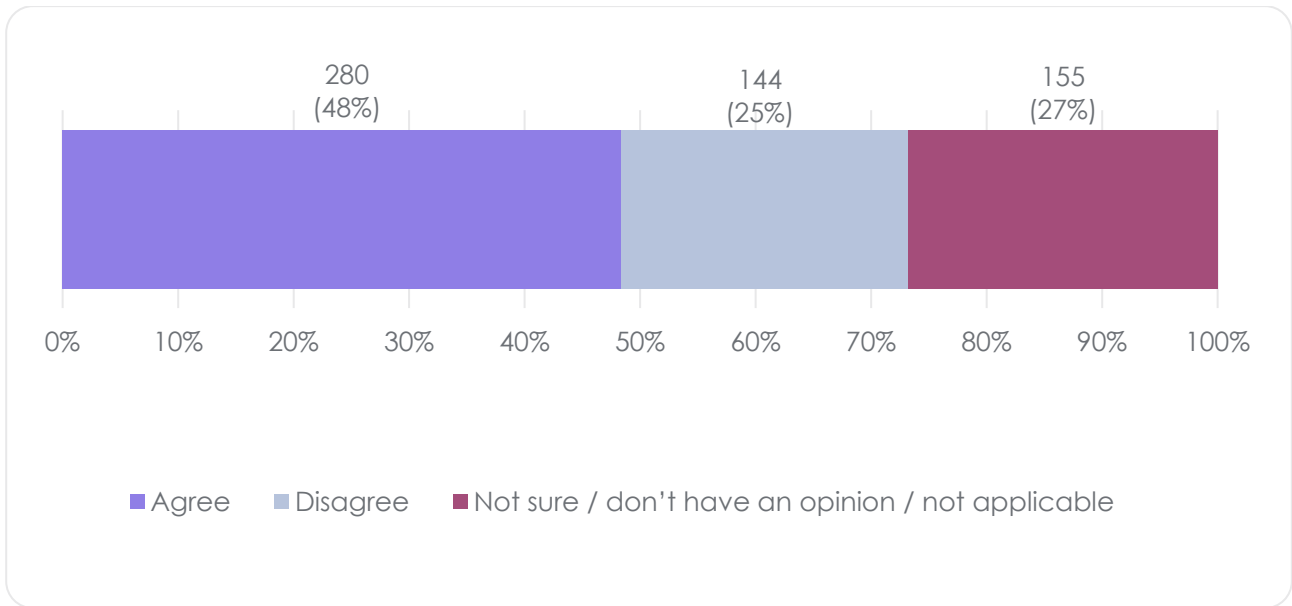


Figure 32 Question 37, (n=579)

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

This question was answered by 294 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestion Use local data	16%	0%	44%	12%	3%	17%
Support General support	14%	1%	39%	2%	0%	8%
Concerns Applicability and breadth of data / one size doesn't fit all	13%	1%	36%	6%	0%	14%
Suggestion Not mandatory	11%	3%	32%	8%	0%	3%
Suggestion Use a range	9%	0%	29%	0%	0%	8%

Support

Many residents express support for the use of standard default values and data, agreeing that it would be useful and that it would make assessments quicker and easier while also providing a degree of consistency.

Some respondents also express support for the use of standard default values and data on the basis that it would provide a common benchmark for local authorities and help to ensure uniformity in assessment approaches.

Concern

Many respondents express concerns regarding the use of standard default values and data, claiming that it would be a 'one size fits all approach' which they feel could not be applied due to local variability. Respondents express concerns that this data would therefore not be representative of a local authority's actual situation and that while it would be useful as a guide, it could mask true values and potentially disadvantage certain areas. Respondents feel that assessments must be based on individual circumstances.

Some respondents express concerns about the reliability of standard values and data, that its use could lead to assessments not being representative of local authorities' true situations. Respondents express concerns that service changes might end up being implemented based on flawed evidence and suggest that standard default values and data should therefore be optional and that regardless of whether they are available or not, what can be measured, should be. Respondents suggest that if these standard values are to be used, they must be determined based on real evidence and regularly updated to account for any variables such as inflation and market changes. Respondents refer specifically to the questions in the consultation relating to free garden waste collection, claiming that this section in particular raised questions for them about the accuracy of the data used in the proposals.

A few respondents express concerns about an apparent lack of detail in the proposals, claiming that TEEP assessments do not account for customer or Equalities Impact Assessment (EqIA) considerations, and seeking clarity on whether local authorities would be able to amend standard values if they were not appropriate for local circumstances.

A few respondents express concerns that standard default values and data may be difficult to agree upon across various stakeholders and that using them might prove to be an unnecessary complication for local authorities. Respondents ask for flexibility in the values and data that local authorities are allowed to use. Respondents also express concerns that the use of standard values and data may facilitate the avoidance of responsibility, and stress that the emphasis for local authorities should be on acting on Government proposals.

A few respondents feel that standard default values and data must be considered alongside Extended Producer Responsibility, reflecting 'family groupings' and linked to the 'efficient and effective' system as outlined in Extended Producer Responsibility provisions.

Suggestion

Many respondents suggest that local data should always be used where possible, because it would be more accurate and would allow local authorities to utilise their own expertise. Respondents feel that decisions made regarding exemptions should be made on an individual basis, backed by robust data, specific to the local authority in question. Respondents comment that this may be especially prudent in terms of cost data, which they feel local authorities will have significant detail about, due to Extended Producer

Responsibility funding discussions.

Many respondents suggest that while standard default values and data should be made available, their use should always be optional. Respondents feel that the use of this data should in fact be an exception, rather than the norm.

Some respondents suggest that local authorities should have the option of whether or not to use standard data and values, on the basis that they are best placed to understand the circumstances in their area and to provide the data and values to reflect this and support their assessments. Respondents also suggest that all standard default values and data must be referenced, in order to allow local authorities to determine whether or not they are applicable to the circumstances in their own area. Respondents suggest that the onus is on local authorities to use the funding made available through Extended Producer Responsibility to ensure the separate collection of materials, and argue that on this basis, there are no grounds for exemptions and subsequently no need for written assessments.

Some respondents suggest that a range of standard default values should be developed in order to reflect the different socio-economic circumstances across local authorities and used accordingly to make assessments more representative and accurate. Respondents suggest that having a range of values that reflected the 'family groupings' proposed for Extended Producer Responsibility payments would be beneficial.

Some respondents suggest that standard default values and data must be set out in collaboration between Government, the Extended Producer Responsibility Scheme Administrator, and the packaging value chain, and as part of an overall TEEP framework. Respondents also suggest collaborating with WRAP.

Some respondents suggest that there is a need for further consultation and seek clarity on certain issues such as:

- how standard default values and data would be calculated;
- how these might link to Extended Producer Responsibility family groupings and how they will affect what is considered an 'effective and efficient' system;
- the proposed carbon metric and whether it aligns with existing activity in baselining carbon emissions; and
- how individual circumstances and demographics would be addressed when assessing service choices across different local authorities.

Respondents suggest that data should be transparent and thoroughly consulted upon to ensure suitability and suggest that Government considers publishing standards to which local data would need to be produced if it were to be used.

A few respondents suggest that standard default values and data should be thoroughly reviewed prior to use, then subject to regular review thereafter and updated accordingly to reflect industry change and innovation. Respondents also suggest that evidenced data that contradicts the default data should be able to replace the latter.

A few respondents suggest that the use of standard default values and data should be dependent on prior agreement of such by the Extended Producer Responsibility Scheme Administrator. Respondents feel that the Scheme Administrator should verify the proper interpretation of these values and data and their use in supporting valid TEEP results.

15.5. Question 38

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

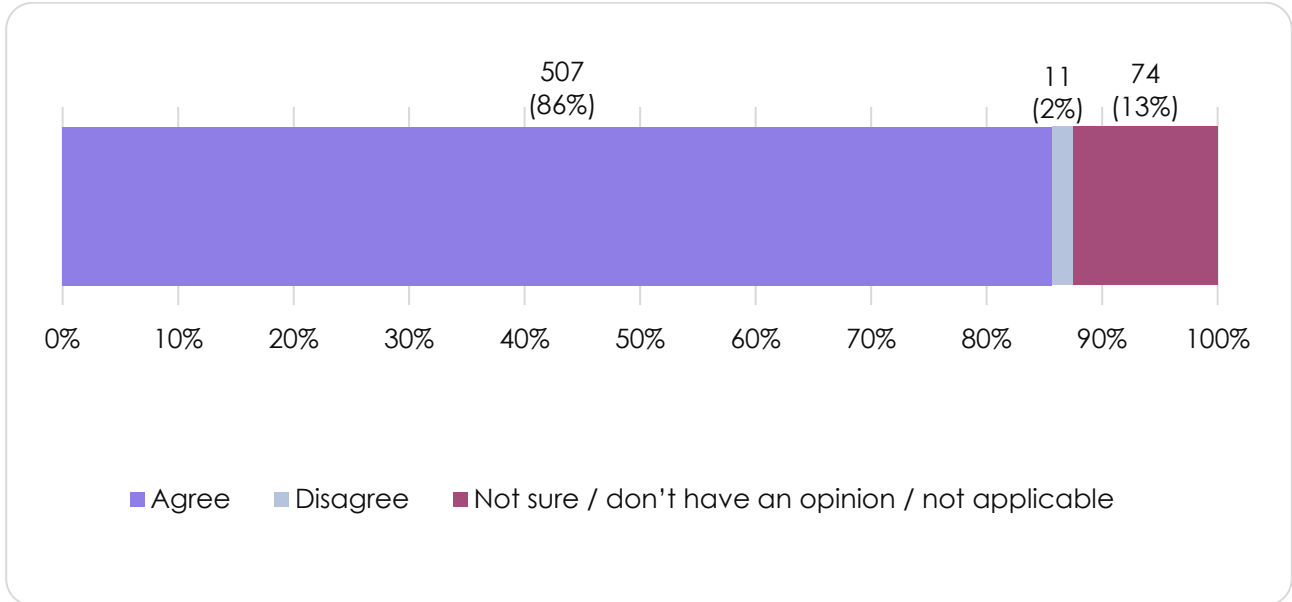


Figure 33 Question 38, (n=592)

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

This question was answered by 226 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Support (general)	14%	4%	34%	20%	6%	14%
Suggestions Include space for free comment	12%	1%	38%	0%	0%	11%
Suggestions Default values/data need involvement from government/EPR SA	2%	0%	0%	18%	10%	0%

Concerns Relationship with DRS/EPR	2%	0%	6%	0%	0%	0%
Suggestions Template requires consultation	2%	0%	6%	0%	0%	0%

Support

Many respondents express their general support for the inclusion of a template as guidance, stating that it would help to ensure consistency and efficiency. Respondents give their support on the condition that the template would not be too restrictive.

Concern

Some respondents express concerns regarding the impact that TEEP will have on Extended Producer Responsibility and the deposit return scheme, and vice-versa. Respondents question whether or not the acceptance of a TEEP assessment could mean that a local authority's recycling practices were automatically considered "effective and efficient". Respondents also state that there needs to be clarity in the template regarding how to account for the impacts of the deposit return scheme and changes driven by Extended Producer Responsibility.

A few respondents express concerns about a template, commenting that local authorities should have a certain degree of freedom when producing written assessments. However, they support the idea of general guidance and example assessments.

Suggestions

Many respondents suggest that if templates are used for written assessments, there should be space for free comment. Respondents feel that this is essential in order to allow for important local context, additional comments, and general flexibility.

Some respondents feel that when defining standard default values and data, input should be sought from Government, the Extended Producer Responsibility Scheme Administrator, and the packaging value chain. Respondents also comment that any decisions made regarding exemptions should be made on an individual basis and should consider the relevant local information.

Some respondents suggest that further consultation should be undertaken in order to ensure that templates are fit for purpose. Respondents recommend that Government should work with various local authorities on the design and testing of templates (including those with different collections systems) to ensure fairness and consistency, and to gather opinions on what exemptions should or should not be considered acceptable.

Some respondents suggest that if a template is provided, its use should not be mandatory and that if a local authority does choose to use it, they should be able to adapt it according to their needs. Respondents agree with the provision of guidance and examples but emphasise the need for flexibility.

Some respondents have various suggestions for alternative approaches that could be adopted, including:

- the implementation of regional level single written assessments to ensure

- consistency across large areas;
- the use of an intelligent spreadsheet for assessments wherein areas of assessment are clearly defined, and a tab could be used for each local authority to provide coordination and consistency, as well as reduce the amount of resources needed;
- the provision of a range of templates depending on area types (such as rural or urban areas); and
- a trigger system within the template that shows when 'significant costs' have been reached to reduce the burden placed on local authorities.

A few respondents suggest that Government should seek approval from the Extended Producer Responsibility Scheme Administrator regarding written assessments, stating that these should be part of a larger framework across the four UK regulators to ensure consistency. Respondents also suggest that the Scheme Administrator should have a role in overseeing and challenging TEEP at a local level.

A few respondents suggest that forms and templates would need to be provided as soon as possible so that the decisions that need to be made at local-level prior to the implementation of new requirements can be as informed as possible. Respondents point out that even with the provision of a template, the new requirement to produce a written assessment will nonetheless represent a burden on local authorities and as such, they suggest additional Government funding should be provided.

A few respondents suggest that a completed example of a written assessment could be useful as guidance alongside (or as an alternative to) a template. Respondents also suggest that 'health and safety' should be included as an important part of the written assessment, since health and safety concerns are an important factor in local authorities' decision making.

16. Proposal 13: Minimum service standards for the separate collection of dry recyclable materials from households

16.1. Question 39

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

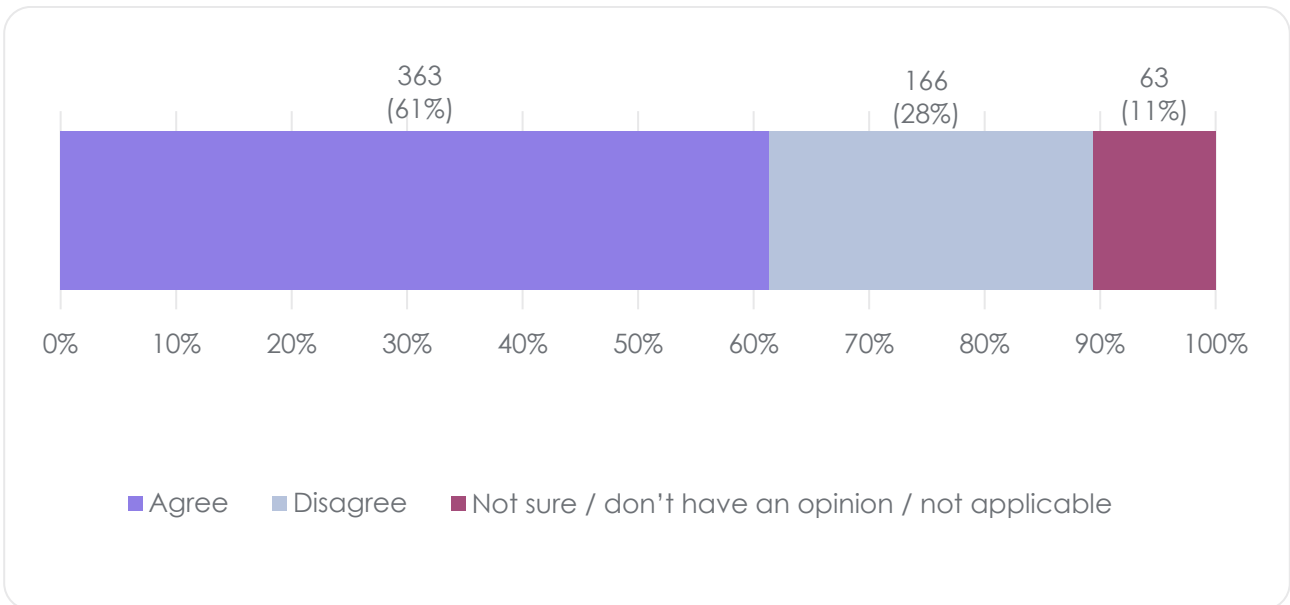


Figure 34 Question 39, (n=592)

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

This question was answered by 291 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Frequency of residual waste collections	11%	0%	38%	0%	0%	3%

Support General support	10%	1%	23%	2%	13%	17%
Concerns Plastic film	9%	0%	26%	0%	3%	17%
Concerns Inadequate infrastructure	9%	0%	27%	0%	0%	6%
Concerns Oppose separation of fibres	8%	0%	25%	0%	3%	6%

Support

Many respondents express support for separate waste collections – particularly the separate collection of recyclable fibres – as they believe this maximises the positive environmental impact of recycling whilst ensuring the materials' quality and end value. Respondents also express support for the kerbside collection of plastic film, believing this could make an important contribution to closed-loop recycling.

Concern

Many respondents express concerns about the inclusion of plastic film. Respondents express concerns that plastic film is particularly vulnerable to contamination as it is often used in food packaging. If it were to be collected as a recyclable material, respondents express concerns that high levels of contamination may render plastic film expensive and complex to process, with limited end quality and value.

Many respondents express concerns that the mandatory introduction of a multi-stream collection system may come into place before the necessary infrastructure – including processing facilities, staff, collection vehicles, and depot space – is available. They suggest that lack of processing infrastructure may be an issue, especially for plastic film.

Many respondents express concerns regarding the proposed separated collection of fibres. Respondents suggest this is unnecessary, and that fibres obtained through co-mingled collection are of an appropriate quality to be effectively sorted and processed.

Many respondents express concerns that transitioning to a separated waste collection service could involve significant planning and infrastructure change, meaning this transition may not be an achievable for many local authorities by the deadlines suggested in the proposal.

Many respondents express concerns that the introduction of a deposit return scheme could have varying impacts on kerbside collection depending on the system, making it difficult to evaluate proposed changes. Respondents also note that Extended Producer Responsibility may influence manufacturers' packaging choices, which would in turn impact recycling needs.

Many respondents express concerns that whilst separated waste collection may result in better quality recyclate, this system places a heavier sorting and container storage burden on householders. Respondents suggest this may lead to resistance or disengagement, when they believe the focus should be placed on encouraging householder support for recycling.

Some respondents express concerns regarding the potentially significant financial cost of the collection and processing infrastructure modifications necessary to offer a multi-stream

collection service, particularly one that captures plastic film. Beyond a transition phase, respondents also express concerns regarding the general increased cost of running and managing a multi-stream collection service, which they suggest requires more collection vehicles, operatives, and containers than co-mingled collection.

Some respondents express concerns regarding a perceived lack of an end market for plastic film, noting that it cannot currently be effectively recycled and may end up being used for energy recovery. Respondents also express concerns because they believe that the end market for fibre is declining, leaving a potential lack of sustainable UK markets for this material.

Some respondents express concerns regarding several areas they feel the proposal fails to adequately address. This includes:

- the handling of houses of multiple occupation and communal collections;
- the composition definition of paper and fibre-based composite packaging;
- the impact of residual waste capacity on recyclable material volume; and
- ongoing changes to waste composition.

Some respondents express concerns that householders may not clearly understand the different categories of materials in a multi-stream system – particularly the difference between flexible plastic and plastic film – which could lead to contamination.

A few respondents express concerns regarding the potential they see for increased carbon emissions caused by the additional collection vehicles and rounds that would be required to offer a separated waste collection service. They express concerns that this may undermine any environmental benefit of such collections.

A few respondents express concerns that many local authorities are already committed to contracts with collection providers and/or material recovery facilities, and that transitioning to multi-stream collection could require significant – and potentially costly – contract renegotiations or terminations.

Suggestions

Many respondents suggest that reducing the frequency of residual waste collections to once every three – or even four – weeks and/or reducing the size of residual waste bins would encourage householders to recycle, thus diverting recyclable waste from the residual waste stream. They therefore suggest that guidance should not mandate a minimum frequency of fortnightly residual waste collections.

Many respondents suggest that co-mingled waste collection is easier and more convenient for householders than a multi-stream system, thereby potentially increasing their participation in recycling and the overall volume of recyclable material collected. Respondents also suggest that many local authorities currently successfully operate co-mingled collection, which are adequately sorted and processed into quality recyclate. Respondents therefore suggest that a co-mingled collection system may be preferable.

Many respondents suggest that local authorities should have the flexibility to decide which waste collection service is most appropriate based on the needs and circumstances of the area. They suggest local authorities should not be required to introduce separated waste collection when this might not be the most economical, practical, or

environmentally beneficial option.

Some respondents suggest that the proposed introduction of separated waste collection is based on the processing capacity that is presently available, and that a more practical approach may be to focus on developing sorting and processing technology before mandating changes to waste collection.

Some respondents suggest that twin-stream collection should be the minimum level of collection service required, supporting the separation of fibres from other dry recyclables. Respondents suggest twin-stream collections still allow for the high-volume recovery of good quality recyclables.

Some respondents suggest that, if required to introduce a separated waste collection system, local authorities should be given financial and practical support by Government. Respondents suggest that guidance on waste collection should be statutory as this creates consistency, whilst others feel non-statutory guidance is more appropriate to accommodate differing local circumstances.

Some respondents suggest that if separate collection is introduced, such collections should remain subject to TEEP assessments.

Some respondents suggest that guidance should outline reasonable circumstances where residual waste collections may be acceptable more frequently than fortnightly. However, other respondents suggest collections more frequently than fortnightly should not be permitted.

A few respondents suggest that both statutory and non-statutory guidance should be regularly reviewed, to accommodate changes in markets, infrastructure, and processing technology, and not inhibit innovation.

A few respondents suggest that Government and local authorities should consult with packaging manufacturers, so that all parties can gain clarity on pertinent recycling issues and make informed decisions. They give the example of fibre-based composites, suggesting manufacturers should contribute to the definition of these recycling categories.

A few respondents suggest that careful consideration should be given to the health and safety implications of separate waste collection, noting, as an example, that there could be increased risk of injury – such as from repeated lifting of collection boxes – for collection operatives.

A few respondents suggest that material recovery (sorting) facilities should be consulted on any changes to waste collection methods. They suggest that if such facilities are able to sort and process co-mingled waste to effectively produce recyclate of high quality and value, they should be given the option to continue doing so.

17. Proposal 14: Non-statutory guidance

17.1. Question 40

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

This question was answered by 450 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Service areas / materials to include Bring sites / collection points / household waste recycling centres (HWRCs)	13%	1%	42%	0%	0%	6%
Suggestions Service areas / materials to include Materials to include Electrical waste / batteries	12%	4%	29%	0%	3%	8%
Suggestions Service areas / materials to include Materials to include Medical waste	11%	1%	37%	0%	0%	6%
Suggestions Service areas / materials to include Materials to include Bulky household waste	10%	0%	31%	0%	0%	8%
Suggestions Work with local authorities/allow flexibility	9%	1%	28%	2%	0%	6%

Support

A few respondents generally support the proposal to work with WRAP to develop guidance and welcome the prospect of ensuring consistent and rapid implementation.

Respondents highlight the positive nature of adapting to future system changes and the inclusion of sanitary products and hazardous waste within guidance. Respondents suggest that given the scale of the proposed changes, it may be useful to develop a suitable timescale for review (suggestion of review in 2028).

A few respondents support the use of non-statutory guidance to promote best practice in waste prevention and recycling. Respondents suggest that Government uses this as an opportunity to highlight best practice among the top performing local authorities. Respondents also recognise however that good practice can differ depending on differences between local authority areas.

Concerns

Many respondents express concerns about the lack of detail in the consultation, particularly the lack of clarity on the purpose of non-statutory guidance and non-binding indicators.

Many respondents express concerns about the lack of option in the consultation to oppose the decision not to proceed with bin colour standardisation, highlighting that the inconsistency with non-household measures may cause confusion. Respondents express concerns about the statutory guidance on alternative weekly residual waste collections, as they feel that this may reduce the incentive to recycle.

Many respondents express concerns about the use of non-statutory guidance and note that this may result in inconsistencies between local authorities. Respondents suggest that in the interests of uniformity and effective systems, all guidance should be statutory. Respondents express specific concerns about the inclusion of hazardous waste in non-statutory guidance. They express further concerns about the use of non-statutory guidance given the volume and scale of the proposed changes.

Many respondents express concerns about what they see as inconsistent environmental messaging, and highlight that in their experience *reducing*, rather than increasing, the frequency of residual waste collections incentivises recycling and increases compliance. Respondents also express concerns that mandating minimum collection frequencies may increase carbon emissions due to carbon inefficient models of waste collection (for example, through increased number of vehicles and collections).

Some respondents express concerns about the negative impact of increased residual waste collections on household recycling. Respondents highlight the association between restricted capacity residual collections and high levels of recycling participation and material capture. They question therefore mandating a minimum collection frequency for residual waste, as this may unnecessarily increase local authority costs and limit their ability to increase recycling rates without having any positive impact on householder satisfaction.

A few respondents express concerns about funding and increased financial pressure on local authorities. Respondents question whether the use of non-statutory guidance will result in the introduction of unfunded new burdens.

A few respondents express concerns about tension with the funding principles of Extended Producer Responsibility. Respondents highlight tensions between what Extended Producer

Responsibility funds and statutory guidance which is then funded through new burdens.

Suggestions

Many respondents suggest that the guidance should cover the operation of:

- kerbside collections;
- Household Waste Recycling Centres (HWRCs);
- bring sites for non-household waste; and
- 'on the go' recycling.

Many respondents suggest that there is a need for specific guidance on waste collection from:

- households of multiple occupation;
- flats and other communal properties;
- sheltered housing;
- flats above shops;
- rented households and student accommodation;
- properties with limited storage space;
- properties in rural areas; and
- households producing non-household waste (childminders, bakers, florists etc).

Many respondents suggest that there is need for specific guidance on clinical and offensive waste collections, including the disposal of:

- Sharps and syringes;
- Incontinence pads;
- Dialysis waste;
- Catheters;
- Stoma bags;
- Sanitary products; and
- PPE.

Many respondents suggest that households should be provided with clear guidance on waste disposal, including waste prevention, contamination of recycling, separation and cleaning of waste, littering, and fly tipping. Clear guidance should also be provided on how to dispose of common household waste, including:

- coffee pods;
- crisp packets;
- fats and oils;
- composite items (e.g. pringles tubes, foil pouches, takeaway cups);
- polystyrene;
- contact lenses;
- nappies and baby wipes;
- batteries;
- lightbulbs;
- aerosols;
- sanitary products;
- writing implements;

- long-life plastics;
- bulky waste;
- white goods;
- DIY waste;
- animal waste;
- hazardous household waste (e.g. engine oil, solvents, adhesives, paint);
- household pesticides; and
- Waste Electrical and Electronic Equipment (WEEE).

Many respondents suggest that there is a specific need to address issues around food waste and contamination for flats and communal properties. Respondents also suggest the inclusion of guidance for enforcement, with some suggesting that the guidance include strategies to increase compliance.

Many respondents suggest the inclusion of guidance on waste provision for private flat developments and suggest that this could encourage stronger planning regulations.

Many respondents suggest that the guidance should include the waste hierarchy and promote waste minimisation. This includes working with new initiatives for waste prevention and disruption.

Many respondents suggest that street cleansing should be included in the guidance, including specific guidance on the separation of waste in street litter bins. Respondents also suggest the need for guidance on commonly-littered materials which are not covered by Extended Producer Responsibility or the deposit return scheme – e.g. food containers and disposable cups.

Many respondents suggest that the guidance should be used to communicate best practice and facilitate the sharing of good ideas. This includes cost effective provision of trade waste collections and commercial opportunities, for example through developing 'bring sites' for non-household waste. Respondents also suggest the inclusion of public education on recycling as respondents suggest that this is central to successfully achieving environmental targets.

Many respondents suggest that Government and WRAP should work with local authorities to include guidance on how to improve the reuse and repair offer at Household Waste Recycling Centres and how to develop collections of reusable items such as bulky waste.

Many respondents suggest that there needs to be clear guidance on textile recycling, including options at bring sites, Household Waste Recycling Centres, and kerbside recycling. Respondents also suggest that guidance should highlight options for waste prevention through donation or repair strategies. Respondents suggest the need to incentivise local authorities to encourage textile recycling.

Many respondents suggest that there should be recognition of local authority knowledge, alongside recognition of differences in demography and infrastructure, to allow for flexibility in service delivery, including the possibility for refusal. A few respondents indicate that they would welcome standardised guidance for local authorities and waste collectors if these incorporated inputs from industry. Respondents suggest the need for guidance on how to deal with consistent contaminators to ensure national consistency.

Many respondents suggest that all materials included as part of consistent kerbside collections should be included in the guidance. Respondents also suggest that Government future-proof any recycling schemes through including new and emerging waste streams, including working in partnership with organisations like Terracycle.

Some respondents suggest that all guidance provided in respect of service changes or methods of delivery required by Government should be statutory. Guidance should also cover all forms of hazardous waste. Respondents also suggest that this may provide an opportunity to revise the HMO (2018) regulations.

Some respondents suggest that guidance should be developed in partnership with local authorities to ensure that it responds to different demographics and supports the practical implementation of guidance, including through the inclusion of effective service design factors. Respondents suggest that the guidance draw on the experience of the top performing local authorities in waste management, who are already achieving performance levels close to the target of 65% by 2035. Respondents also suggest that reprocessors should be included in the development of guidance to ensure viable end markets.

Some respondents suggest that guidance should include advice on how to reduce issues such as contamination of recycling and fly tipping, as this forms a significant financial burden, especially at communal bin stores and bring sites. Respondents warn, however, that the guidance must allow for local circumstance and therefore be flexible. A further suggestion is to ensure guidance recognises the interrelationship between kerbside recycling and Household Waste Recycling Centres.

Some respondents suggest that guidance should include how to promote waste prevention and move items up the waste hierarchy. Respondents also suggest that there should be guidance on increasing the collection and recycling of non-packaging items and utilising opportunities to recycle longer life plastic items at local authority recycling centres.

A few respondents suggest that resources should be provided to fund further consultation with key stakeholders to ensure that legislation and guidance is of high quality. Respondents suggest that a wider pool of experts is used from across the local government, third sector and NGO communities.

A few respondents suggest calculating the CO₂e emissions for the whole waste collection system. Further suggestions include a waste analysis in order to produce guidance and methodology on residual waste streams.

A few respondents suggest clear Government guidelines for retailers on pack labelling to demonstrate to consumers how to recycle. Respondents also suggest that guidance should include how to dispose of non-recyclable items and bio-plastic, biodegradable and compostable materials to prevent them being placed with dry recyclable and/or food and garden waste. Further suggestions include providing end market case studies to show households and local authorities the ways that waste can be beneficially recycled.

A few respondents suggest that there should be more support for community actions, including litter picks.

18. Proposal 15: Review of Part 2 of Schedule 9 of the Environmental Permitting Regulations 2016

18.1. Question 41

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

This question was answered by 413 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Clear definitions/consideration needed for sampling protocol	11%	0%	36%	0%	0%	6%
Suggestions Changes must be adequate to deliver EPR reform	7%	0%	24%	2%	0%	3%
Concerns Funding / financial cost	5%	4%	6%	16%	0%	8%
Concerns Relationship with EPR (inc. suggestions of how to deal with)	4%	1%	11%	0%	3%	11%
Support General support	3%	1%	5%	4%	0%	11%

Support

Many respondents express support for the recommendations set out in the consultation and note that this should help to improve the quality and coverage of material facilities data. Respondents warn that any changes should be consistent with other waste policy reforms.

Some respondents express support for any proposals to increase transparency and the use of a review of the regulations to drive higher standards across the sector. Respondents suggest that this may be useful to gain an accurate picture of recycling tonnages and performance, sampling regimes and flow of data within the sector. Respondents highlight the need for greater accountability for the export of recyclable material and note that

more accountability of suppliers would be helpful. Respondents suggest that transparency to the public about how their waste is managed may be helpful to increase compliance rates.

A few respondents express support for the review of sampling and material tracking at/between material facilities to provide the necessary results in a uniform, robust and efficient way. Respondents note that the approach must, however, be practical and not incur excessive cost.

Concerns

Many respondents express concerns about funding of the scheme and suggest that any additional requirements to either material recovery facilities or local authorities would need to be fully funded through the new burdens funding or Extended Producer Responsibility obligations. Respondents express specific concerns about significant additional resource and costs implications related to the requirement to sample each load of materials received.

Many respondents express concerns about whether additional costs will be covered within Extended Producer Responsibility and new burdens funding. Respondents request that Government do not underestimate the initial and on-going costs of any new requirements. Respondents note that while changes in regulations must be suitable to deliver aspects of Extended Producer Responsibility, they must also be fair to local authorities.

Many respondents express concerns about the range of materials being collected and how these are likely to change in relation to the combined drivers of the deposit return scheme, Extended Producer Responsibility, and the plastic packaging tax. Respondents suggest that the material recovery facilities sampling regimes will find it difficult to reliably distinguish between Extended Producer Responsibility and Non-Extended Producer Responsibility materials.

Many respondents express concerns about whether changes in the regulations are a suitable vehicle to deliver aspects of Extended Producer Responsibility reform. Respondents suggest that careful consideration be given to any sampling protocols to ensure retention of the ability to monitor material quality of inputs/outputs and process efficiency. Respondents raise concerns that reviewing the Environmental Permitting Regulations is insufficient to provide the data required for demonstrating compliance with Consistency in Household and Business Recycling rules and Extended Producer Responsibility payments as this will fall to local authorities to do the additional sampling, and this will need to be fully funded. Respondents question whether local authority sampling alone (e.g. at Waste Transfer Stations) will be sufficient and suggest that the duty for material facilities to carry out sampling be retained.

Some respondents express concerns about current levels of transparency and accountability. Respondents highlight poor reporting at present, the need for registration of small recycling facilities, and the need for a sampling protocol that is fair to both collectors and reprocessors. Respondents highlight that the protocol should only reflect contamination that affects material quality.

Some respondents express concerns about current lack of clarity on 'target' materials and highlight variance in understanding across facilities. Respondents request further

clarification on the sampling protocol for specific materials, including cartons, glass, and tin cans. Respondents seek clarification on how to carry out compositional analysis exercises in facilities that receive recyclable waste streams from more than one local authority. Respondents highlight the importance for sampling protocols to be clearly defined and fair to both local authorities and material recovery facility reprocessors.

Some respondents express concerns about the impact of sampling and highlight that current sampling and reporting already provide important data to monitor material flows, therefore respondents feel it is important that additional sampling provides a net value add.

A few respondents express concerns that the proposals seem to address the problem of difficult to recycle and low-quality packaging at the reprocessing stage. Respondents suggest that it would be more effective to address the issue at source by regulating the sale and use of these materials in UK markets.

A few respondents express concerns about the timing of the review and suggest that this should have been reviewed in advance of any consultation on Extended Producer Responsibility. Respondents note that for Extended Producer Responsibility to be successful a review of P2 S9 is essential and should have taken place in advance of publication of the consultation.

A few respondents express concerns about the levels of evidence, the involvement of producers, and question whether the proposals will improve outcomes.

Suggestions

Many respondents suggest that careful consideration be given to the design of the sampling protocol to ensure that it is designed in a way that is fair to both collectors and reprocessors and recognises the additional pressure and time delays. Respondents suggest the inclusion of clear definitions for non-targeted material that is an operational concern, noting the need to identify when this either directly impacts material quality or creates contamination that then impacts on material quality. Respondents warn that the protocol should not be designed in a way that leaves loopholes that will reduce or remove justifiable payments to local authorities and other waste collectors.

Many respondents suggest that careful consideration should be afforded in any changes to ensure they are fit for purpose to deliver Extended Producer Responsibility reforms. Respondents note that the rationale behind implementation of material recovery facility regulations was not linked to aspects of producer responsibility policy reform, therefore care needs to be taken to ensure coherence across the Environmental Permitting Regulations and Extended Producer Responsibility reforms.

Many respondents suggest that the introduction at material recovery facilities of new technologies such as computer vision, tag and tracing systems, automating reporting could give high-quality data of compositional analysis to recyclers, legislators, manufacturers, and other actors affected by Extended Producer Responsibility.

Some respondents suggest that consideration be given to the whole packaging value chain to ensure the regulations are fit for purpose when the packaging reforms are implemented (Consistency in Household and Business Recycling, deposit return scheme,

Extended Producer Responsibility, and the plastic packaging tax). Respondents suggest that there be one audit regime, including the tracking and reporting between processing sites in different areas, and when waste is 'sold' for processing elsewhere. Respondents further suggest that Government recognise the role of other facilities in the recovery network for commercial and industrial waste, besides material recovery facilities, that act as 'bulking up' points for paper and board recycle.

Some respondents suggest that further consultation be carried out to ensure that new sampling and reporting activity is properly cost audited. Respondents suggest that the consultation should include all relevant stakeholders across the value chain. Respondents further suggest that the final assessment of the material lie with the reprocessor rather than a material recovery facility, as the reprocessor is the body that has end of waste status.

Some respondents suggest that distribution and packaging at source should be targeted as part of the review. Respondents also suggest that the review of the Environmental Permitting Regulations be used as an opportunity to reduce red tape for chemical recyclers that currently operate under chemical refining/processing regulations.

Some respondents suggest that while all incoming recycling would need sampling due to the mix of packaging and non-packaging waste, this could be done by bulking sample sets from customer streams over the course of a day for later compositional analysis to ensure processing efficiencies.

Some respondents suggest that, given the additional sampling that will be necessary as part of Extended Producer Responsibility obligations, it would be logical to review Materials Analysis facilities. Respondents also suggest that the burden of increased reporting needs to be considered against the additional reporting that will be required under Extended Producer Responsibility.

A few respondents suggest that any amendments to the Environmental Permitting Regulations 2016 focus on ensuring that high quality material is produced to maximise value and ensure ready markets for recycle.

A few respondents suggest that as these proposals are likely to increase cost to the local authority as the Waste Disposal Authority, due to the need to train staff in the new sampling matrices and to upgrade facilities, these costs should be funded under Extended Producer Responsibility regulations.

A few respondents suggest minimising amendments of Schedule 9. Respondents suggest that as Schedule 9 is already in place, Government should limit associated risks of increased costs arising from contract changes. Respondents suggest that Government prevent duplication of systems (in particular related to electronic duty of care) through limiting amendments to only include those that are specifically necessary to ensure that Schedule 9 is aligned with and supportive of the data requirements for Extended Producer Responsibility.

A few respondents suggest that any Extended Producer Responsibility scheme waste compositional analyses cover packaging, non-packaging, other recyclables, residual, and in-scope deposit return scheme materials.

A few respondents suggest that any changes to Environmental Permitting Regulations

must have the objective of improving the quality of collected used packaging and ensure that any changes support the aims of the amendments. Respondents also suggest the inclusion of proportional cost contribution from the collector of waste. Respondents further suggest that particular focus be given to plastics recycling facilities as these are likely to increase in number.

A few respondents suggest that consideration be given to the design of a reliable, robust, and frequent sampling and audit protocol to ensure quality and to identify causes of contamination. Respondents also suggest that where quality standards meet the reprocessing requirements, a scheme could be considered compliant without the requirement for exemptions under TEEP.

A few respondents suggest the need for robust data and highlight the need for more data and/or research in relation to non-recyclable contamination. Respondents suggest that data from the deposit return scheme be included to validate and enrich the data and suggest the inclusion of depots runs by recovered paper operators as evidence points in the value chain. Respondents also note the need to future-proof the system through understanding the potential of automation of sampling through Artificial Intelligence.

A few respondents suggest that any changes are kept to a minimum to ensure that Schedule 9 is aligned and supportive of the reporting aspects required with other proposed changes. For instance, relevant aspects which may arise from the recent consultations related to the deposit return scheme and Extended Producer Responsibility.

A few respondents suggest that any changes minimise burdens on local authorities and avoid double sampling at Waste Transfer Stations and material recovery facilities.

A few respondents suggest that the frequency of sampling and waste compositional analyses be considered and set out as soon as possible to help inform a decision on whether all first points of consolidation should be required to report (i.e. a material recovery facility rather than a small transfer station may be more appropriate).

18.2. Question 42

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

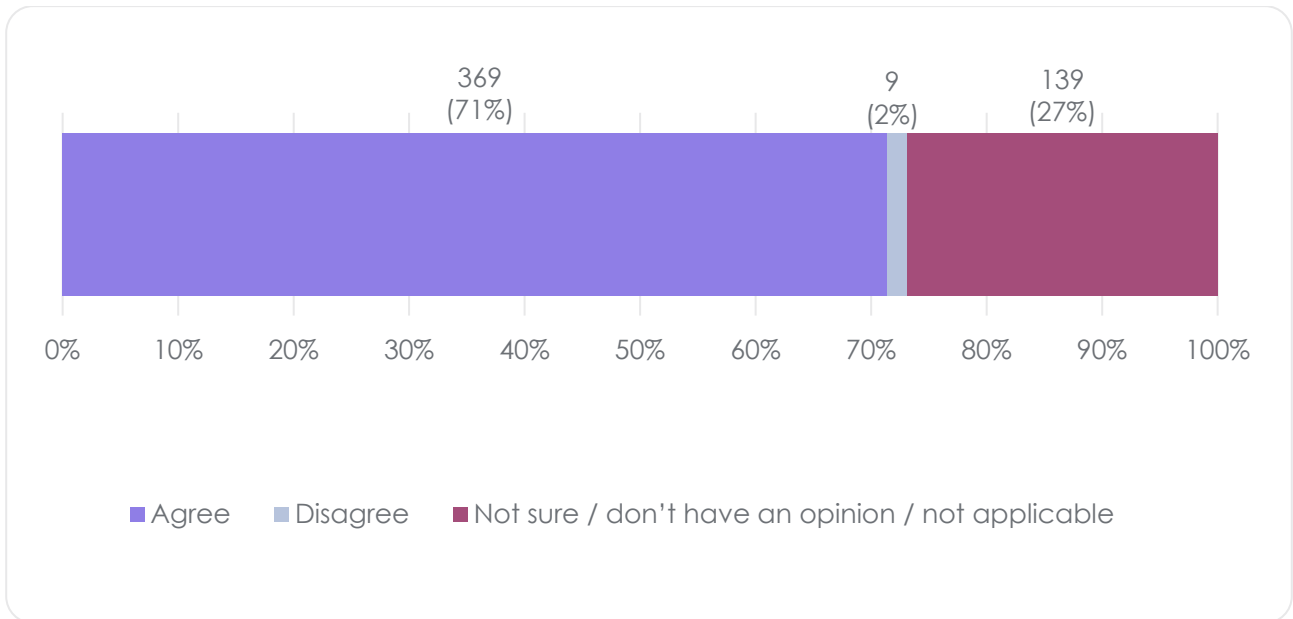


Figure 35 Question 42, (n=517)

18.2.2. Please provide the reason for your response where possible.

This question was answered by 266 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Tracks changes in waste composition	6%	0%	19%	0%	0%	3%
Support General support	5%	1%	11%	0%	6%	11%
Support Monitoring effectiveness	5%	1%	9%	2%	3%	11%
Concerns Costs	4%	3%	2%	20%	0%	0%
Support Caveats to support	3%	0%	10%	0%	0%	0%

Support

Many respondents express support for the continued sampling of non-packaging dry recyclable materials. Respondents note that it is important to continue to understand the details and composition of non-packaging materials and undertake waste compositional analyses. Respondents highlight that this information is important for identifying which

materials to target in behaviour change interventions and to understand the entire waste stream. Respondents suggest that continued sampling will assist with developing protocols and tracking the impact of Extended Producer Responsibility and the deposit return scheme on waste composition. Respondents highlight that additional data is required as the current sampling requirements do not fully distinguish between packaging and non-packaging materials (e.g. mixed papers and rejects).

Many respondents express support for the continued sampling of non-packaging dry recyclable materials as they believe that this data is essential to support an effective and efficient system across the whole value chain. Respondents note that this information is important for local authorities to enable them to select the best waste collection methodology, to identify sources of contamination, and understand effectiveness of the waste collection, sorting, and recycling process. Respondents further note that this enables local authorities to have confidence in the quality of materials originating from their waste streams.

Some respondents note the importance of data and evidence to effective regulation and public confidence. Respondents express support for improvements to traceability and accountability for the recycling of packaging and non-packaging recycling.

A few respondents express support for the continued sampling of non-packaging dry recyclable materials as they feel this improves consistency and adherence and ensures alignment with recyclable waste streams reforms set out in the Environment Bill.

Concerns

Many respondents express concerns about the responsibility for additional costs and note that this should be borne by Extended Producer Responsibility or by local authorities.

Some respondents express concerns about the sampling suite and request clarity over target and non-target materials.

Some respondents express concerns about lack of clarity on the need for sampling of non-packaging materials. Respondents highlight the burden on material recycling facilities to sample packaging and note that removing the requirement to sample non-packaging materials may reduce this burden.

A few respondents express concerns about the relationship between the proposals, alongside those made as part of the proposed deposit return scheme, and the need to ensure that Extended Producer Responsibility costs are appropriately determined for obligated packaging producers. Respondents also question whether the Extended Producer Responsibility payments will remove the need for recycling credits.

Suggestions

Some respondents suggest that further detailed consultation is needed prior to incorporation into guidance.

A few respondents suggest that costs associated with non-packaging dry recyclable materials should not be met by EPR obligated producers, with others suggesting they are met by the producers placing these items on the market. Respondents note that these may not be packaging producers.

Respondents make various suggestions about the approach to sampling, including sampling all input materials but reporting on packaging and non-packaging materials separately; random sampling; or that sampling could be dispensed with if material consistency could be guaranteed.

19. Proposal 16: Recycling credits

19.1. Question 43

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

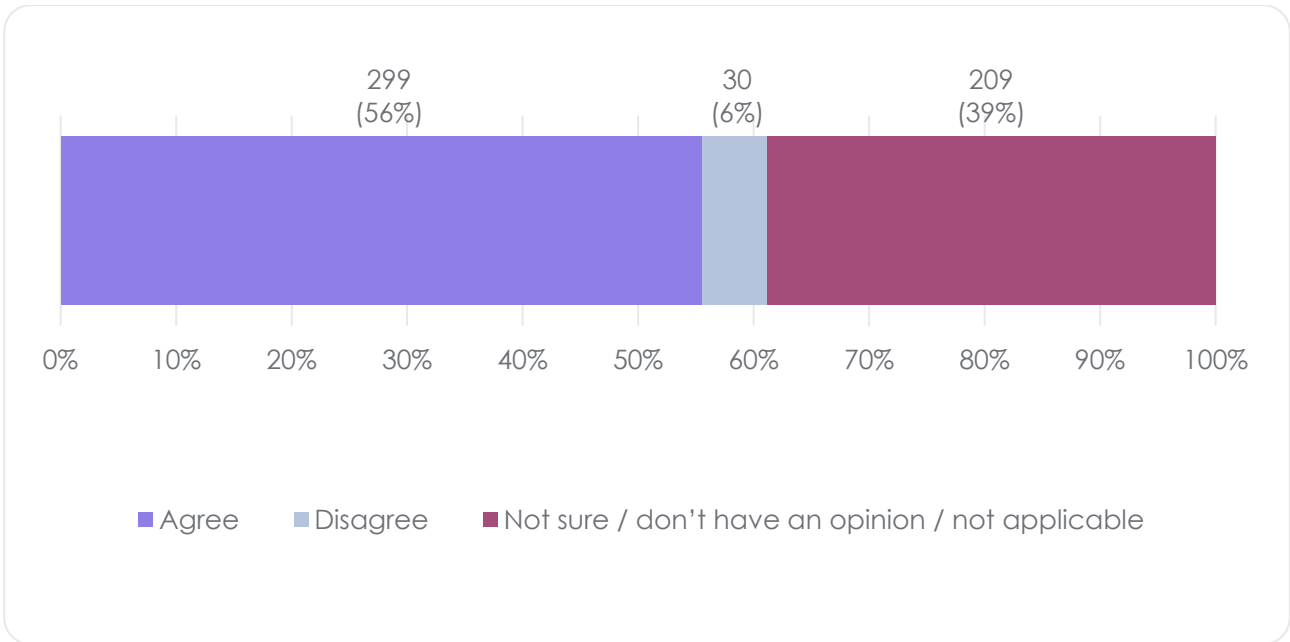


Figure 36 Question 43, (n=538)

19.1.2. Please provide the reason for your response

This question was answered by 282 respondents. Their comments are summarised below

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support No need for recycling credits due to EPR	9%	1%	24%	0%	0%	8%
Concerns Credits outdated / ineffective / unsuitable	7%	1%	20%	0%	0%	8%

Concerns Funding / financial cost	5%	0%	16%	2%	0%	3%
Suggestions EPR funds should not be transferable	4%	4%	0%	14%	23%	0%
Support General	3%	1%	5%	2%	3%	6%

Support

Many respondents express agreement that the credit system is no longer fit for purpose. For example, respondents believe that credits are not relevant for many two-tier authorities as Waste Disposal Authorities deal with the costs of end markets. Respondents state that this is the general consensus amongst all local authorities.

Many respondents express support for the proposal that provision for exchange of recycling credits should not relate to packaging material subject to Extended Producer Responsibility payments. Respondents state that credits are made redundant by Extended Producer Responsibility payments as funding will cover costs to local authorities, or that providing both credits and Extended Producer Responsibility funding would effectively be awarding a double payment.

Many respondents express general support for the proposed reviews to Part 2 Schedule 9, in relation to recycling credits. Respondents state that they support Government proposals to replace credits with Extended Producer Responsibility payments.

A few respondents express agreement with concerns about the use of recycling credits. Respondents state that they believe credits distort the value of materials, and other respondents state that local authorities already have alternative schemes in place instead of credits.

A few respondents state that as a unitary local authority, they do not use recycling credits. Respondents state that previously, as a two-tier Authority, they did use a credit system.

Concerns

Many respondents express a range of concerns about funding and financial costs to local authorities, associated with the proposed reviews to Part 2 of Schedule 9 in relation to recycling credits. For example, respondents express concerns about:

- a potential funding gap between the end of credits and the start of Extended Producer Responsibility payments;
- their view that Waste Collection Authorities might end up worse off;
- their view that Waste Disposal Authorities might pay more; and
- the perceived lack of detail on Extended Producer Responsibility payment flows and their timing.

Some respondents express concerns that some materials, such as non-packaging dry materials (for example books, newspapers, and magazines) will not be covered by Extended Producer Responsibility or New Burdens funding. Respondents believe that if credits are removed, there are no provisions to encourage wider recycling for items such as textiles.

Some respondents express a range of concerns about a perceived lack of detail in the

proposal in relation to the following:

- how credits are currently used;
- how Extended Producer Responsibility funding will work;
- the lack of financial modelling; and
- the general vagueness and lack of guidance in the proposal.

A few respondents express concerns about changes to recycling credits because they believe the use of these credits incentivises local authorities to share costs and divert material higher up the Waste Hierarchy.

Suggestions

Many respondents state that the Extended Producer Responsibility Scheme Administrator should have a relationship with all local authorities across the United Kingdom, and that any funds paid to local authorities by the Extended Producer Responsibility Scheme Administrator should be awarded based on recycling performance and should be non-transferable.

A few respondents make varied suggestions on alternative approaches to recycling credits. For example:

- that all local authorities should be merged into unitary authorities;
- that financial relationships should be based upon tonnages;
- that the role of the Waste Disposal Authority should be updated;
- that the financial relationship between Waste Disposal Authorities and Waste Collection Authorities needs to be reviewed and updated;
- that a levy amendment for non-packaging materials could be set; and
- that authorities in two-tier areas should have flexibility in pursuing local agreements.

19.2. Question 44

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

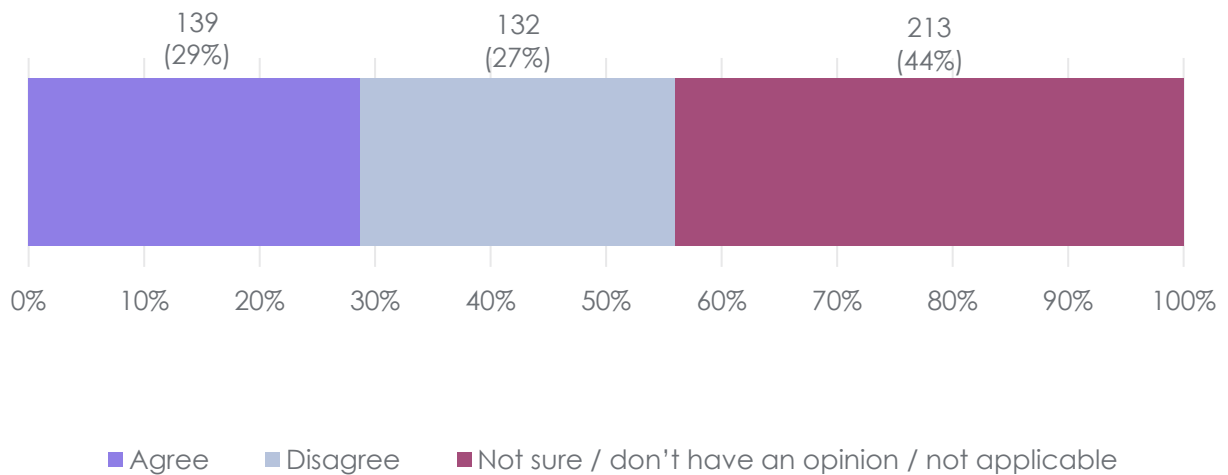


Figure 37 Question 44 Option 1, (n=484)

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

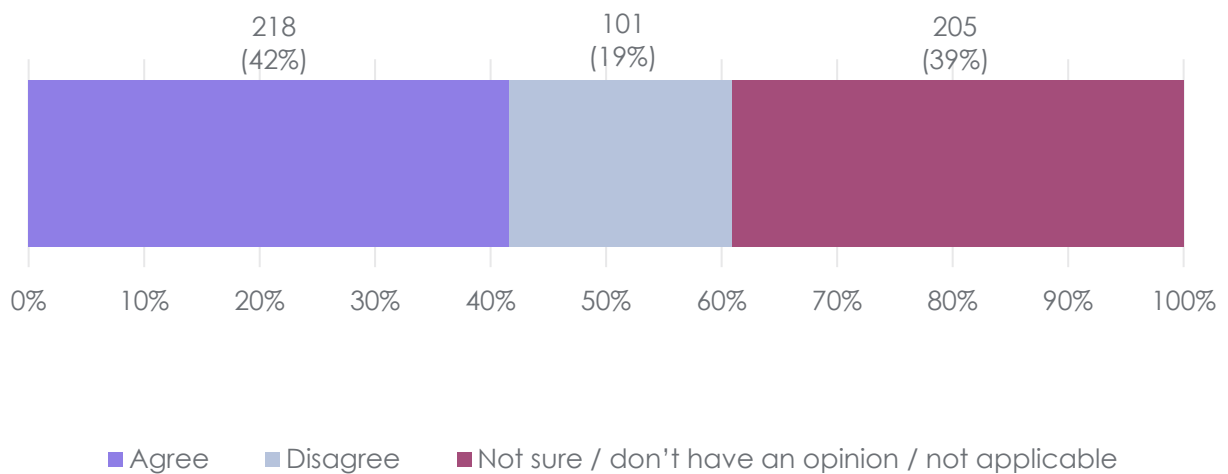


Figure 38 Question 44 Option 2, (n=524)

19.2.3. Comments

Question 44 was a closed question which presented two options and did not give space for comments. However, a number of respondents made comments in emails, or in response to other questions, which were labelled as being for this question. Their comments are summarised below. For context, the options presented are also shown below.

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

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

Comments on Option 1

Many respondents express support for Option 1, with a number going on to comment that they feel Option 1 provides more certainty than Option 2.

Some respondents express concerns about Option 1 as to whether a universal payment could be made consistently, correctly and reimburse the whole value chain accordingly.

Comments on Option 2

A few respondents express support for Option 2, on the basis that they feel Option 2 provides greater flexibility or value for money. Respondents also comment that, as recycling credits are not a feature of unitary authorities, that the devolved administrations, as well as unitary authorities in England, have effectively already dispensed with recycling credits.

Some respondents express support for Option 2 on the basis that they feel that the current recycling credit system is outdated, no longer fit for purpose, or that they have already moved away from the credit system and have alternative arrangements in place.

Many respondents express concerns with Option 2 on the basis that it may have a negative impact on local authorities. Respondents express concerns about changes to cost and income, stating that it reduces the likelihood of local agreements being reached, without specifying further.

A few respondents express concerns with Option 2 because they do not feel that this option aligns with the aims of the Consistency in Household and Business Recycling consultation, and they predict it will result in a raft of different approaches across the country.

Other concerns

Many respondents express concerns that abolishing the recycling credits system completely may result in significant funding gaps for Waste Collection Authorities. Some respondents comment that although they generally agree that the recycling credits system is no longer fit for purpose, there is nervousness amongst Waste Collection Authorities about any move which would remove them.

Many respondents express concerns about the rising costs of waste management to local authorities, and question how these cost increases will be met by any solution. A few respondents question whether Extended Producer Responsibility funding could be used.

Suggestions

Many respondents suggest that local agreements may be necessary, and that any local agreements that are in place should be transparent and provide fair funding to both tiers of local government. Some respondents suggest that agreements should be unanimous, or that a conciliation process should be available for where there is not unanimous agreement.

Many respondents suggest that the decision to retain recycling credits issued for non-

packaging waste should consider the context of a continued and sustained decline in collection rates of paper and newsprint for recycling.

Some respondents suggest that an entirely new system, or mechanism, for reimbursing Waste Collection Authorities for non-packaging waste needs to be established.

Respondents comment that this system must incentivise improvements in recycling rates or focus on waste hierarchy. Respondents also suggest that a national review of the current system should take place.

19.3. Question 45

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

This question was answered by 371 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestion Conflict resolution process / arbitration process	8%	0%	25%	0%	3%	0%
Support Support / support measures that ensure local agreements can be reached	6%	4%	9%	16%	0%	6%
Suggestion Keep credit system	5%	0%	16%	0%	3%	0%
Support Current approach/binding formula	4%	1%	12%	0%	0%	3%
Suggestion Dispense with recycling credits entirely	3%	1%	6%	2%	3%	3%

Support

Many respondents express support for measures that ensure local agreements can be reached and believe such agreements are preferable to a one-size-fits-all formula that may not account for differences between local authorities.

Many respondents support the proposal that a binding formula should be put in place as a backstop for scenarios where local agreements cannot be reached.

Concerns

Many respondents express concerns that the introduction of a binding formula may in effect reintroduce recycling credits, which they believe would be contrary to the aims of the consultation.

Suggestions

Many respondents make a number of specific suggestions for what to do when local agreement cannot be reached:

- **An appeals, mediation, or arbitration process.** Respondents suggest Government should provide a conflict resolution service, while others suggest that local authorities should seek support themselves.
- **A standardised national approach** as this may ensure consistency and a level playing field between local authorities.
- Local authorities should be able to decide whether to **use recycling credits**.
- **A legal requirement for reaching local agreements should be in place**, with some respondents also suggesting implementing a deadline for this and introducing a system to ensure agreements are fair.
- **Where a Waste Collection Authority and Waste Disposal Authority cannot reach agreement**, the latter should pay for disposal or treatment costs. Others suggest that any costs should be shared equally.

Many respondents express different views about the use of recycling credits:

- **Many respondents suggest that recycling credits should be dispensed with entirely** in favour of arrangements that focus on value for money and performance improvement, or that credits should not apply to packaging that falls within the scope of Extended Producer Responsibility.
- **Many respondents suggest retaining the recycling credit system.** Some believe this could facilitate payment for small amounts of material such as newspapers, while others think this would retain a financial incentive in the relationship between Waste Collection Authorities and Waste Disposal Authority. Respondents express concerns that removing recycling credits may decrease the funding available to Waste Collection Authorities, especially in the context of public sector funding cuts.

Many respondents suggest that further consultation on this proposal is needed, with some specifying this should happen after the effects of the deposit return scheme and Extended Producer Responsibility are better known.

Some respondents suggest that changes to the recycling credits system should account for a perceived decline in the amount of paper and newsprint being collected for recycling.

A few respondents suggest that, where an agreement cannot be reached, the mechanism to resolve this should account for alternative recycling mechanisms, such as community and environmental groups that are paid through recycling credits.

20. Proposal 17: Dry materials to be collected from non-household municipal premises for recycling

20.1. Question 46

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

20.1.2. Aluminium foil

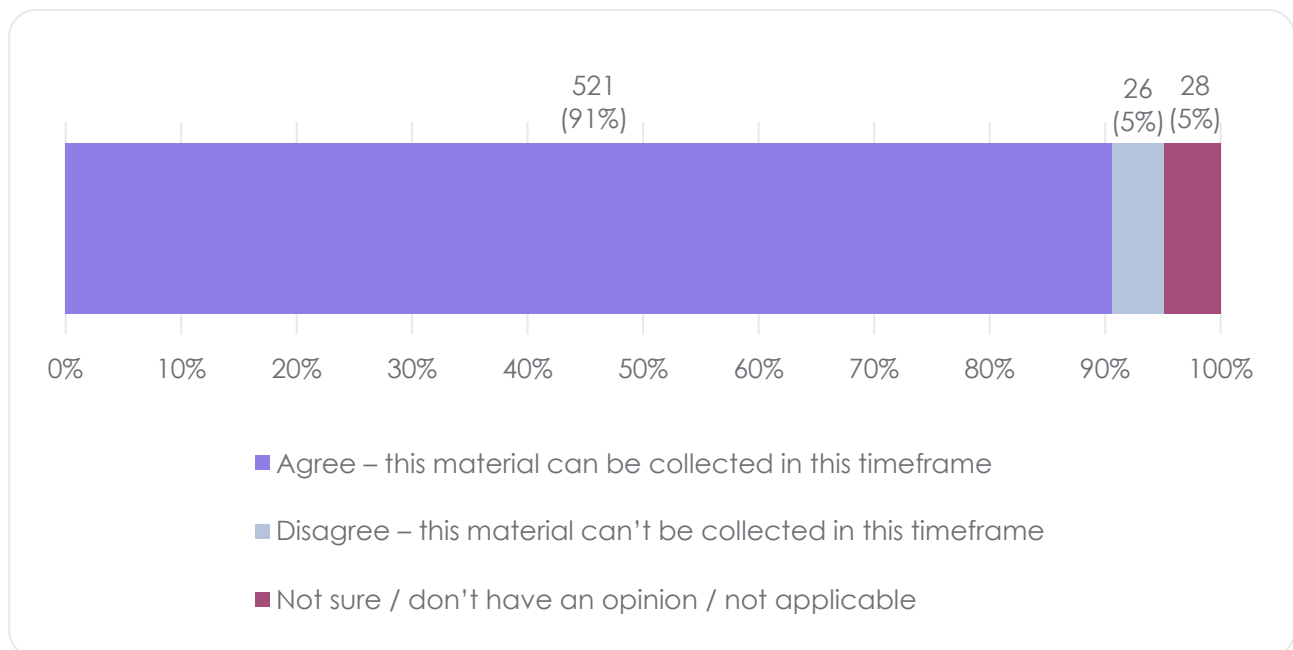


Figure 39 Question 46 – aluminium foil, (n=575)

20.1.3. Aluminium food trays

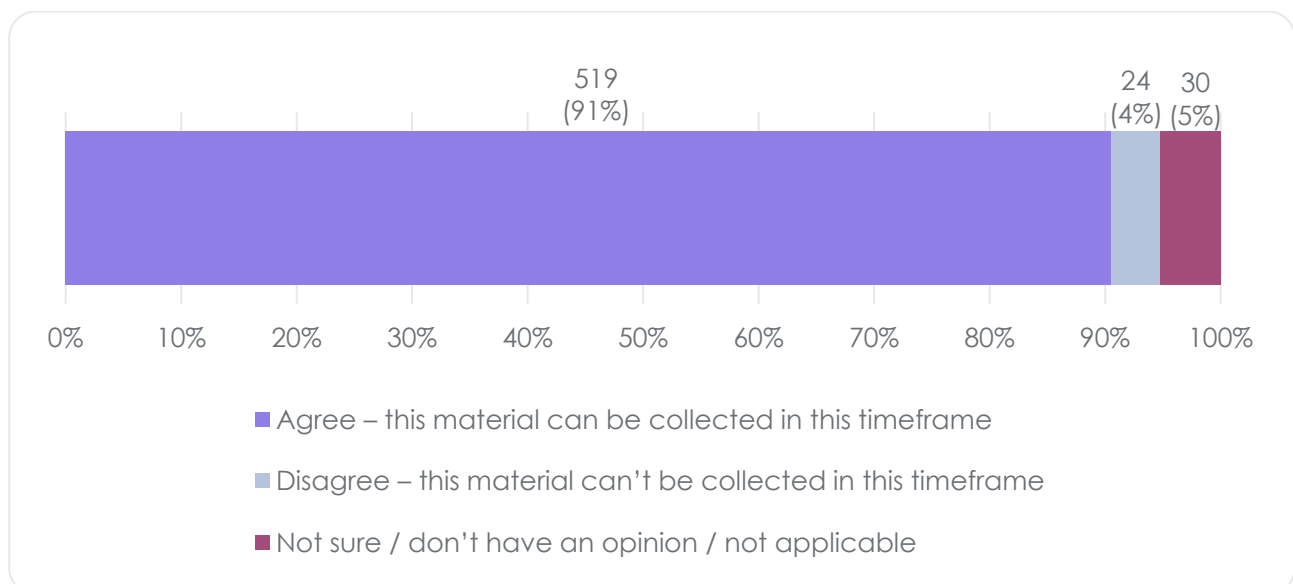


Figure 40 Question 46 – aluminium food trays, (n=573)

20.1.4. Steel and aluminium aerosols

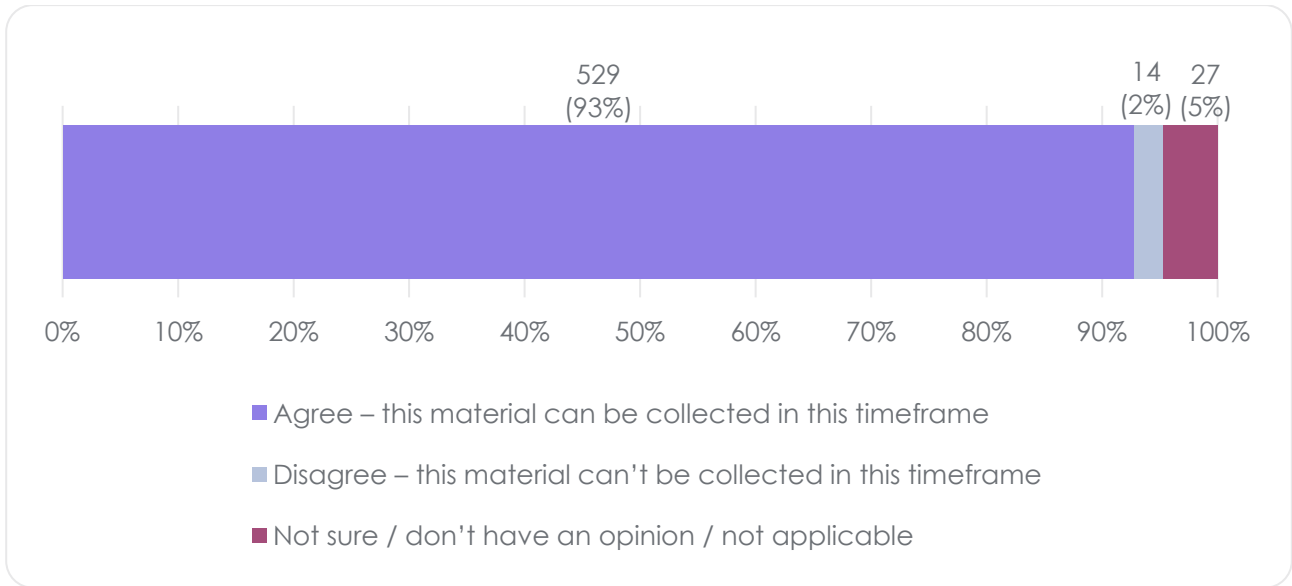


Figure 41 Question 46 – steel and aluminium aerosols, (n=570)

20.1.5. Aluminium tubes e.g. tomato puree tubes

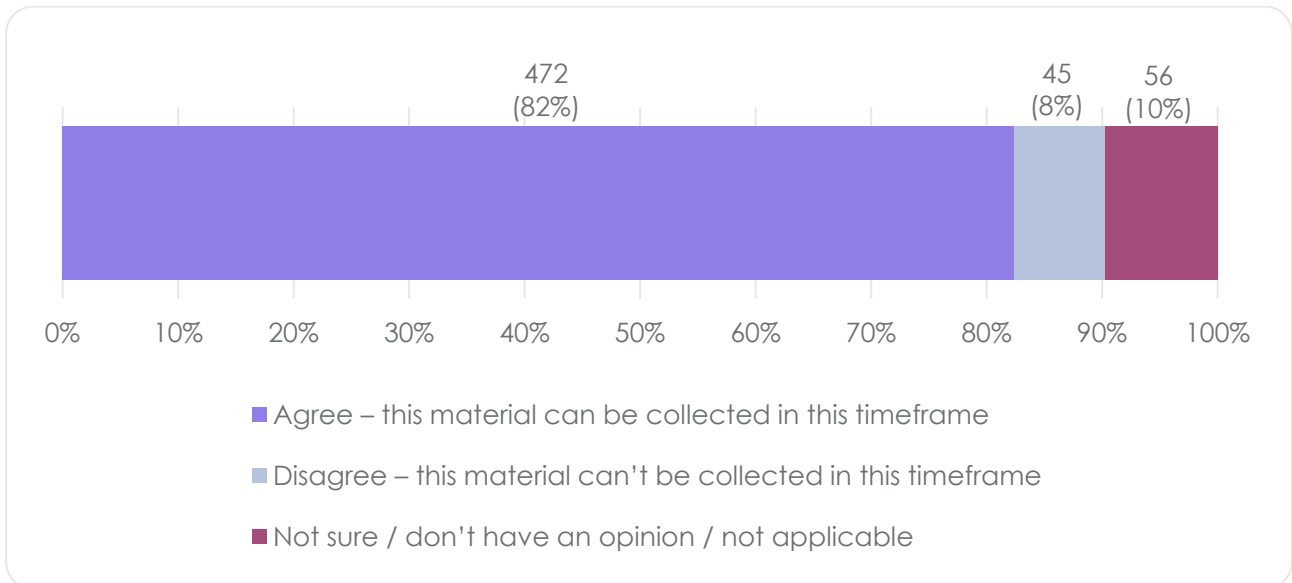


Figure 42 Question 46 – aluminium tubes, (n=573)

20.1.6. Metal jar lids

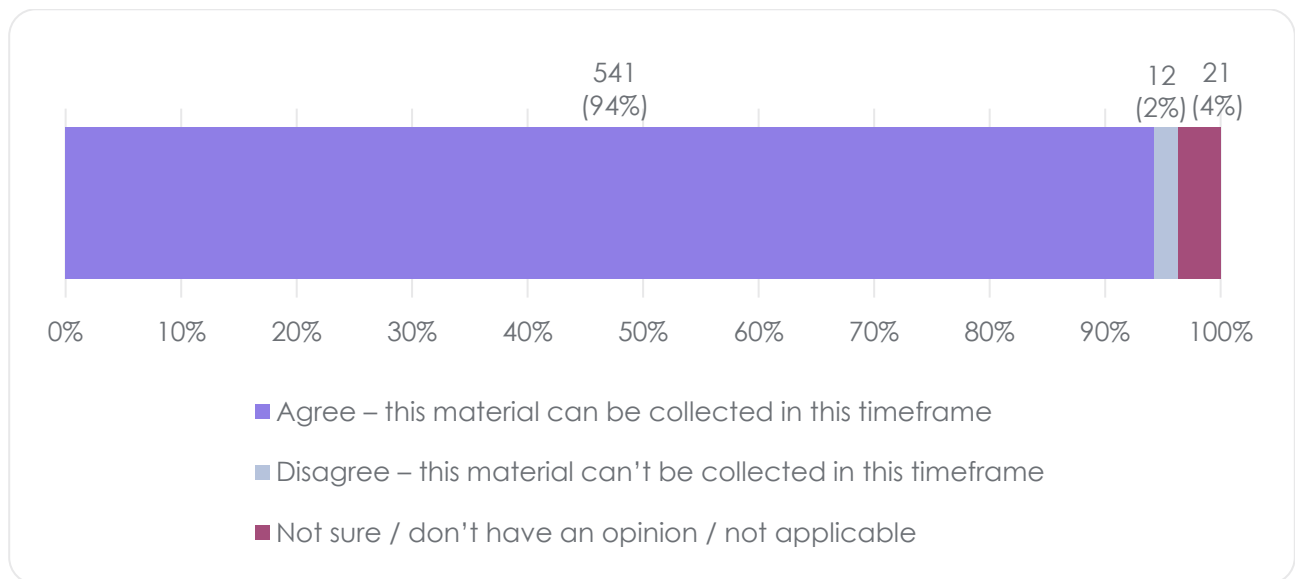


Figure 43 Question 46 – metal jar lids, (n=574)

20.1.7. Food and drink cartons e.g. TetraPak

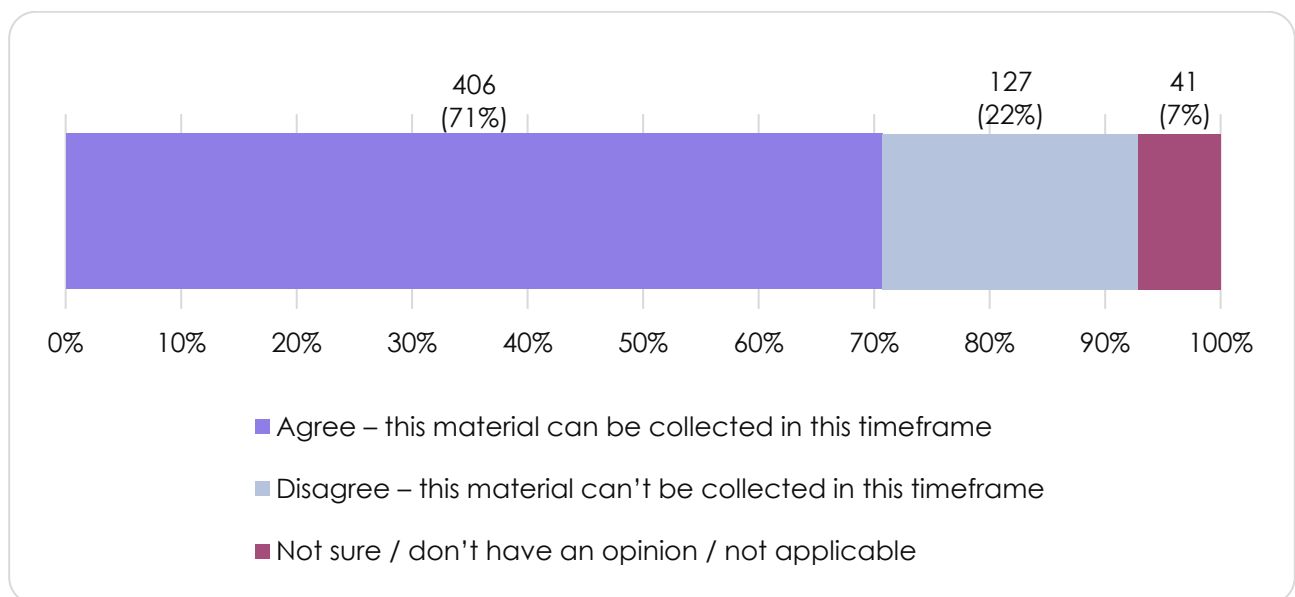


Figure 44 Question 46 – food and drink cartons, (n=574)

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

This question was answered by 280 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Specific materials Food & drink cartons (TetraPak)	12%	0%	38%	0%	3%	14%
Concerns Inadequate infrastructure / end markets	10%	0%	30%	2%	3%	8%
Support General support	9%	2%	14%	8%	26%	31%
Concerns Specific materials Aluminium tubes	9%	0%	27%	0%	0%	6%
Concerns Contamination	8%	0%	24%	0%	0%	6%

Support

Many respondents express support for the inclusion of all mentioned materials from the outset and support a consistent approach to recycling collections in England to deliver higher quality recycling. Respondents note the importance of alignment between the devolved nations alongside clear messaging to consumers, businesses, and local authorities.

Concerns

Many respondents express concerns about limited collection, sorting, processing, and recycling infrastructure. Respondents express concerns about the economic viability of including dry recyclable materials from non-household premises and suggest that imposing set dates through legislation risks devaluing the recycling stream by putting items lower value items through the recycling process. Respondents express concerns about their ability to communicate effectively with householders about end markets, which potentially negatively impacts on customer compliance. Respondents express further concerns about their ability to procure a fleet within the set timescales.

Many respondents express concerns about the inclusion of food/drinks cartons in the collection of dry materials from non-household premises. Concerns include:

- lack of public understanding around food/drink carton materials resulting in contamination of the paper/cardboard recycling stream;
- limited sorting capability at local material recovery facilities, both locally and nationally, particularly in relation to sorting flattened or non-flattened cartons. Respondents suggest that this may result in it not being possible to meet timescales;
- contamination of other (paper and plastic) material streams resulting in reduced

- product quality;
- limited end markets and potential reliance on export solutions;
- inadequate fleet and vehicle infrastructure to meet demand;
- lack of transparency around whether food/drinks cartons are sent for recycling or energy recovery;
- the potential impact of modulated fees within Extended Producer Responsibility on reducing carton production and use, thereby making any investment in new infrastructure for recycling these products unnecessary; and
- whether plastic or paper/card producers will fund the cost of carton recycling under the Extended Producer Responsibility.

Many respondents express concerns about the inclusion of aluminium tubes, foil, and food trays for recycling from non-household premises. Concerns include:

- increased likelihood of contamination of aluminium tubes with food and potential for this to result in more food waste within the metal recycling stream;
- some tubes are mixed metal-plastic materials and therefore more work is required to establish the feasibility of including tubes;
- uncertainty about end markets for the materials;
- potential need for changes to the sorting infrastructure, including the need for large holding facilities for aluminium 'bales'; and
- impacts on collection systems if material must be collected separately.

Many respondents express concerns about whether including the listed dry materials from non-household premises will increase waste stream contamination, particularly for aluminium foil, aluminium tubes, and cartons. Respondents express concern that potential contamination may reduce the value of the final product and therefore reduce income. Respondents also question whether this would be an effective measure and point to a composition analysis, undertaken in 2020, that indicated that these additional materials would add only 1% to current recycling rates but that the contamination factor may reduce the recycling rates resulting in a net environmental disbenefit.

Some respondents express concerns about the planned timescale for collection of dry material waste from non-household premises, whether material recovery facilities will be able to adapt and upgrade capacity in time to meet increased demand and be able to accept a wider range of materials. Respondents note that while it is technically possible to collect and sort co-mingled waste, it may not be possible within the set timescale. Respondents suggest that it may not be possible to make the necessary changes to current waste infrastructure, including vehicles and storage facilities, with the timescale. Respondents also note that to meet timescales, all key decision and details will need to be included in the 2022 regulations for material recovery facilities to make the necessary investment decisions.

Some respondents express concerns about alignment with the deposit return scheme and Extended Producer Responsibility. Respondents note that dry recyclable materials included in consistent collections must align with what is deemed recyclable within Extended Producer Responsibility. Respondents raise concerns about the inconsistency between Extended Producer Responsibility and Consistency in Household and Business Recycling messaging about de-incentivising the production of hard-to-recycle products.

Respondents suggest that Extended Producer Responsibility focuses on designing out hard-to-recycle materials like cartons, foil/foil trays and plastic films/pouches. Respondents raise further concerns about whether the modulated fees will go far enough to prevent consumers buying them in the medium term.

Some respondents express further concerns about the timeline and highlight that if Consistency in Household and Business Recycling reform is pushed back, and Extended Producer Responsibility is delivered from 2023/24, this will result in recyclable material (that would be designed for recyclability, as incentivised by eco-modulation) not being collected for recycling, and ultimately leading to an expensive and ineffective system for businesses. Respondents therefore suggest that the implementation deadline for consistent collections is not delayed.

Some respondents express concerns about alignment with the deposit return scheme, particularly in respect of timescales and policies across the nations. Respondents express concerns about the impact of the deposit return scheme removing aluminium cans from the metals stream, leaving only the more challenging metal foils and aerosols, and therefore potentially impacting the economics and offtake qualities for end markets. Respondents express concerns about the impact of implementation of deposit return on timing as space for material take-back or siting of reverse vending machines could well be competing with space for segregation of materials from consistent collections and Extended Producer Responsibility. Respondents question the impact of glass not being included in the deposit return scheme.

Some respondents express concerns about Extended Producer Responsibility payments and question how the 'netting off' of payments will affect local authorities if there are no end markets.

Some respondents express concern about excessive costs with no net environmental benefit and highlight that the modulated fees with Extended Producer Responsibility would need to take account of the additional costs throughout the value chain. Respondents express particular concerns about the potential impact on local authorities. Respondents express further concern about the capacity of the market and current infrastructure to meet demand.

Some respondents express concerns about the space (internal and external) needed to store and separate waste in business premises and highlight the potential negative impact on communal spaces. Respondents highlight the variation in business types and the additional complexity this creates when compared with household collections. Respondents suggest that Government to take on board learnings arising from the approaches developed within the devolved administrations.

A few respondents suggest that inclusion of cartons in regulations should be later than proposed to ensure robust sorting capability and prevention of contamination of other material streams.

A few respondents express concerns that the collection of marginal items will reduce the quality of other materials collected and undermine the value chain in existing collection systems. Respondents express concerns about mandating the collection of the listed items as these are marginal in terms of volumes and adding value to the value chain.

Respondents question whether there should be more focus on the businesses rather than waste collectors, noting that commercial recycling services are sometimes already provided but businesses opt for single residual waste collection.

A few respondents express concerns about the negative impact on local authorities if the non-household waste industry is pressured to implement changes, as it has been acknowledged within the consultation that local authorities are likely to require additional time to implement such changes. Respondents highlight that where businesses are under a statutory duty to separate these items, it may result in the loss of much of local authority core business if competitors from the non-household waste industry are able to provide a collection service sooner.

A few respondents express concerns about the potential negative impact on smaller private waste collection businesses as they will have more limited access to appropriate facilities within the area they operate, whereas larger operators have an existing network to facilitate the movement of waste over long distances to alternative sites. Respondents suggest therefore that changes should not be mandatory for businesses or waste collectors until it has been confirmed that there is sufficient capacity available for all businesses and waste operators, or at least a longer grace period to ensure that access can be fully supported.

A few respondents express concerns about infrastructure capacity and suggest that realistic timescales be in place to ensure effective management of materials.

Suggestions

Some respondents suggest that requirements for non-household waste should be consistent with requirements for household waste. Respondents suggest that alignment may offer scope for efficiencies across waste collection, for example using the same vehicle for domestic and business collections, as well as making requirements easier for the public to understand.

Some respondents suggest that the suite of new measures (Extended Producer Responsibility, deposit return scheme, Consistency in Household and Business Recycling) be implemented simultaneously. Respondents suggest that the 'go live' date be in 2024.

Some respondents suggest the need for aligned policies on packaging across the devolved nations to effectively underpin the proposed mandatory recyclability labelling system under Extended Producer Responsibility.

Some respondents suggest that the start of Extended Producer Responsibility be April 2024 rather than October 2023 as the latter would be unfeasible based on the time needed for the Scheme Administrator to become fully mobilised following its appointment in early 2023.

A few respondents suggest that Government provide businesses with the time and support needed to adjust to the new requirements. Respondents suggest that there should be a deferral of the start date on some/all of the new requirements to build in the necessary educational and/or enforcement elements of any future zoning/tendering process.

Some respondents suggest clarification on the scope and timing of the form of deposit return scheme and the form and quantum of funding from Extended Producer

Responsibility to enable investable conditions in 2022. Respondents also suggest that consideration be given to the infrastructure of bin provision and communication with the public to ensure consistency and prevent confusion.

Some respondents further suggest that measures to reduce the UK's overall materials consumption, increase resource efficiency and introduce effective waste prevention plans should continue alongside recycling measures. Respondents highlight the importance of services being flexible and future facing, for example through trialling new material types, so that services can adapt to new and emerging waste streams.

Some respondents suggest the need to support businesses to appropriately identify their waste, along with the use of incentives to encourage compliance by businesses. Respondents also suggest the resourcing of local authority staff to enable them to deliver tailored collections that meet the needs of each business type.

Some respondents suggest that consideration is given in future consultations to the broader issue of bring-back sites and refuse centres to address consumer frustration about how to recycle or best dispose of items such as clothing, electricals, batteries, books, CD's, light bulbs, cosmetics, cleaning products and DIY waste.

20.2. Question 47

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

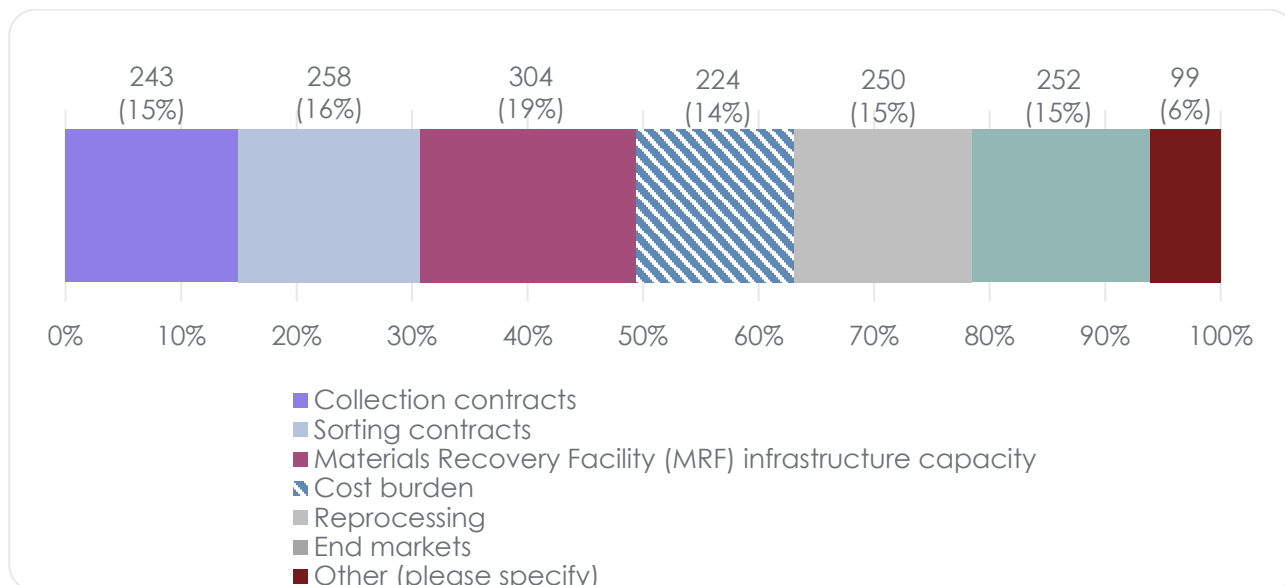


Figure 45 Question 47, (n=388)

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

This question was answered by 385 respondents. Their comments are summarised below.

This section also summarises comments from respondents in response to the option "Other (please specify)" in question 47 (above). 73 respondents offered comments in response to this question. These two parts of the question are summarised together because of the

overlap in the answers given to each question.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Reason to extend Inadequate infrastructure	15%	2%	44%	2%	0%	17%
Suggestions Reason to extend Contracts	13%	2%	38%	2%	0%	8%
Suggestions Reason to extend End markets	10%	0%	31%	0%	0%	19%
Concerns Implement sooner (ASAP / not specified) / just get on with it	9%	6%	0%	35%	23%	14%
Suggestions Reason to extend Financial cost	9%	0%	27%	0%	0%	8%

Support

Some respondents express support for the proposed timescales and suggest that Government focuses on supporting local authorities and businesses to identify solutions and overcome challenges rather than permitting exemptions.

Concerns

Many respondents express concerns about the inclusion of exemptions and note that plans have been known for a considerable time, removing the justification for exemptions. Respondents also note that the cost burden is not a relevant issue as producers will be covering the full net cost. Respondents further note that end markets and reprocessing are national, rather than single authority, issues and so therefore should not be used to justify exemption. Respondents request clarity about reduction in Extended Producer Responsibility fees for any local authorities that are initially exempt from mandated collections.

Many respondents express concerns about the ability of material recovery facilities to meet demands for sorting the new sets of materials by 2023/24. Respondents note that limits on how far materials can be transported for sorting reduces options for awarding contracts, and express concerns about current infrastructure to ensure consistent and

thorough sorting of aluminium foil and tubes, and food and drinks cartons.

Some respondents express concerns about the extent of changes, noting that the impact of Extended Producer Responsibility and the deposit return scheme needs to be assessed prior to making major collection changes. Respondents point to potential behaviours and market changes, most notably through potential reduction in production and use of composite packaging and suggest that this may remove the need to adapt recycling streams for such materials. Respondents express concerns about the potential impact of local authority exemptions on obligated producer Extended Producer Responsibility fees.

Some respondents request a more detailed proposal from Government. Respondents express concerns about lack of clarity regarding when Extended Producer Responsibility funding and new burdens funding will be allocated, and whether this is available for sorting contracts. Respondents also request clarity about whether local authorities already operating a fully compliant service will receive funding. Respondents express concerns about the 2023/24 deadline, and request that Government provide a specific date (e.g. 31st March 2024) to ensure clarity and facilitate planning. Respondents express further concerns about lack of clarity about materials to be included in mandated collections. Respondents note inconsistent definitions for waste types are currently being used across the various relevant Acts and regulations and request consistency in terminology when referring to household and non-household waste.

Some respondents express concerns about the inclusion of all businesses and difficulties for some businesses and households to meet requirements, particularly with regards to space for storage, and note that this may negatively impact public perception of cleanliness.

Some respondents express concerns about the timescale and note that changes on this scale usually take 3-5 years to implement. Respondents express further concerns that national changes will create congestion across the whole supply and infrastructure system, and request clarity about whether market supply issues will result in local authorities being penalised for not meeting timescales.

Some respondents express concerns about the timing of Extended Producer Responsibility funding and new burdens funding for food waste and request alignment. Respondents note that timing is particularly important for authorities that do not currently collect food waste, as they would look to implement one service change for both food and dry recycling collections.

Some respondents express concerns about the complexity of change for any local authorities moving from a co-mingled service to a source separated service, requiring increases in vehicles, staff, and depot space, and request that Government recognise that this might take longer to achieve.

Some respondents express concerns about public perception of export end markets and the negative impact on public confidence and participation. Some respondents express further concerns about end markets and requirements placed on material imports, noting that there have been times when material markets prices have dropped to the point where is not economic for material recovery facilities to sort material for recycling. Respondents recognise that there are limited interventions available to Government to address market fluctuations but note that this highlights the challenge local authorities

face in securing end markets for all materials collected.

Some respondents express concerns about collection contracts, highlighting that they are usually designed around the useful working life of the vehicles (roughly 7 years).

Some respondents express concerns about the ability of the market to supply services if there is high demand due to lots of contracts and vehicle replacements happening at the same time, resulting in shortages of collection vehicles or longer lead in times.

Respondents also express concerns about low levels of interest for collection contracts, potentially resulting in value for money issues.

Some respondents express concerns about how material recovery facilities will fund the upgrading of equipment to meet demand. Respondents note that as local authorities will not receive payments for Extended Producer Responsibility obligated materials until 2023/24 and, as material recovery facilities gain their income through gate fees for local authority contracts, more clarity is required about how material recovery facilities will receive a cash flow to finance the required investment in equipment upgrade.

Some respondents express concerns about the capacity of sorting facilities to meet demand and sort both multi-stream and co-mingled materials ready for reprocessing.

A few respondents express concerns that the proposals may require changes in contracts or contract terms and highlight that it is most cost-effective to do this at the end of current contract periods. Respondents suggest more clarity is required as to whether any extra payments required to cover additional contract change costs would be covered under Extended Producer Responsibility payments, and if so whether the payments represent value to producers on who the obligations and payments fall.

A few respondents express concerns about potential lack of interest to bid for contracts from the private sector, particularly for rural area contracts, and their ability to meet deadlines due to ongoing uncertainty. Respondents therefore highlight the need for more detailed proposals to reduce uncertainty and facilitate private sector planning.

Suggestions

Many respondents suggest that the scale of required changes to infrastructure may result in delays, particularly in relation to upgrading of material recovery facilities and supply of appropriate vehicles/fleets.

Many respondents suggest that the difficulties posed by contract changes should be taken into consideration, either due to being unable to amend contracts or recognition of the cost implications of changing contracts prior to expiry and renewal. Respondents also note potential difficulties with current suppliers being unable to meet the demands of the new contracts, for example if a material recovery facility is unable to process an obligated item. This is particularly challenging if this is either a national or long-term (25 year) contract.

Many respondents suggest that reliable and sustainable end markets need to be identified in order for collection of materials to be environmentally beneficial, and that this lies beyond the scope of individual local authorities. Respondents suggest that Government stimulate end markets, potentially using legislation. Respondents also raise concerns about reliance on export end markets.

Many respondents suggest that all net costs, including transition costs, should be covered by Government.

Some respondents suggest that more investment is needed to ensure infrastructure can meet demand, and to identify accessible and sustainable end markets.

Some respondents suggest alignment with Extended Producer Responsibility, the deposit return scheme, and the plastic packaging tax, noting that this may motivate a move away from using composite materials. Respondents therefore suggest that materials such as food cartons are not included on the obligated materials list until the impact of the other measures are fully understood.

A few respondents suggest a longer transition timescale of 2025/26 or 2026/27 to allow for existing 36-month contract cycles to expire.

Some respondents suggest that any changes to non-household premises collections should be aligned with household collections to ensure consistency and maximise efficiencies.

A few respondents suggest flexibility to allow local authorities to adapt for individual environmental, geographic, and demographic factors while still meeting overall targets.

21. Proposal 18: Collection of plastic films from non-household municipal premises

21.1. Question 48

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

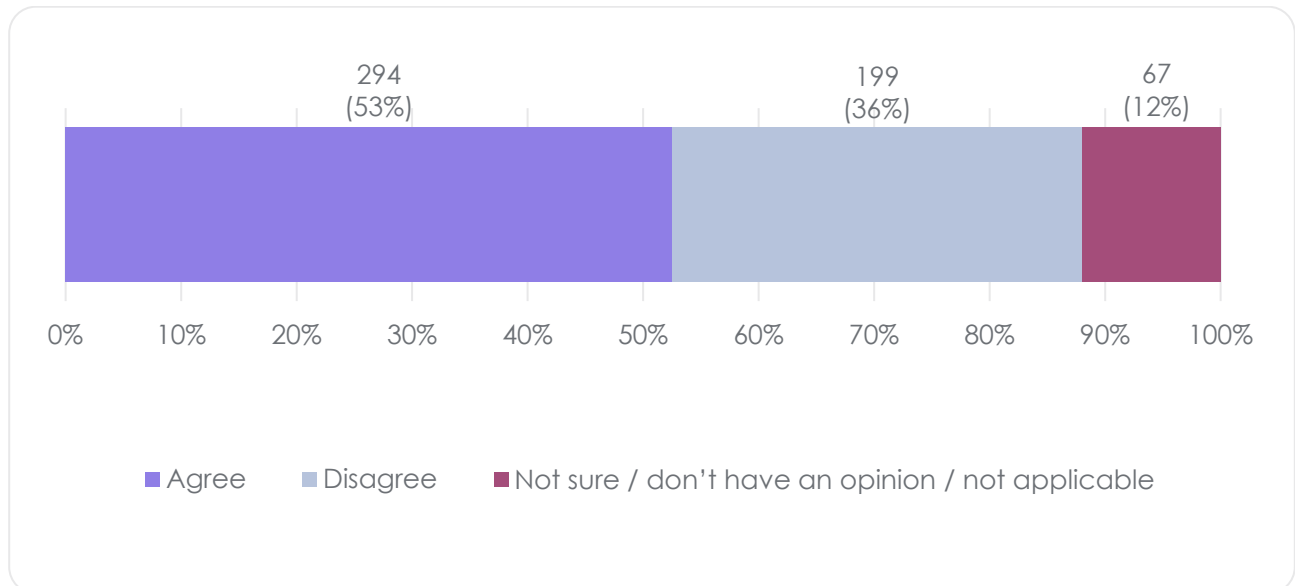


Figure 46 Question 48, (n=560)

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

This question was answered by 293 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Coordinate timescales	14%	0%	38%	8%	13%	19%
Concerns Inadequate infrastructure	13%	1%	36%	4%	0%	25%
Concerns End markets	12%	0%	37%	4%	0%	6%

Concerns Contamination (hard to clean)	10%	0%	29%	4%	3%	14%
Concerns Practicalities of separating plastics	8%	0%	24%	0%	0%	8%

Support

Some respondents express support for the inclusion of plastic films in non-household municipal premises and note that consistent recycling of plastic films and flexibles is essential to ensure Government meets environmental targets. Respondents also note that transition should be as short as possible to minimise ongoing disruption to material recovery facilities. Respondents suggest that increased collections of plastic films could encourage emerging chemical recycling technologies and closed loop markets, enabling identification of end markets and stimulation of investment.

A few respondents express support for prioritising the collection of plastic films and suggest that the target year should be earlier than 2024/25.

Concerns

Many respondents express concerns about current infrastructure and question whether there will be capacity to sort and process plastic film within the current timescale.

Many respondents express concerns about lack of viable end markets for plastic film. Respondents acknowledge that potential new end markets are being explored in relation to chemical recycling, however they note that these are at test stage and scalability remains unclear. Respondents express concerns about potential reliance on export markets and damage to public confidence if clear end markets are not identified.

Many respondents express concerns about contamination of films and flexibles when collecting from businesses and question whether the required sorting and reprocessing infrastructure will be in place to process this material effectively. Respondents note that if separate collection is required, due to lack of infrastructure, the 2024/25 timescale may be unrealistic for businesses. Respondents express further concerns about contamination potentially devaluing the recycling stream.

Many respondents express concerns about the complexity of a plastic film stream due to the variation in polymer types. Respondents express concerns about the practicalities of separating plastics and emphasise the challenge of educating the public to enable them to clearly identify different materials. Respondents express further concerns about the processing requirements for some of the more complex plastics and note that the types of plastics received from non-household premises may differ significantly from the types received from households, raising questions about infrastructure capacity to process these materials.

Many respondents express concerns about the potential negative impact on investments if the TEEP application of the changes are not sufficiently certain and predictable, as this may reduce industry confidence to make required investments.

Many respondents express concerns about the different dates for household and non-

household collection of plastic film and suggest that for local authorities to collect plastic film effectively and efficiently, and to remain competitive, the implementation date should be the same for household and non-household premises.

Many respondents express concerns about the financial implications of a new recycling stream and request clarification about whether costs will be covered by Extended Producer Responsibility. Respondents also express concerns about the higher financial costs of making changes to vehicles/fleets sooner than usual fleet replacement schedule.

Some respondents express concerns that inclusion of plastic film will require contractual changes with current providers, many of whom do not currently accept plastic film.

Some respondents express concerns about lack of detail on acceptable plastic film types and suggest that more detail is provided to ensure consistency and quality.

Some respondents express concerns about lack of storage space and capacity of small businesses to sort and store waste in separate containers.

Some respondents express concerns that if all plastic film is not included as an obligated material this could disincentivise the development of technology solutions and investment for polymers. Respondents also express concerns that if plastic film is not collected for recycling it may affect eco-modulation and on-pack recycling labelling requirements.

A few respondents express concerns about the collection of waste from micro-sized non-household municipal waste producers and the logistics of combining household and non-household collections.

Suggestions

Many respondents suggest that timescales for collecting plastic film from non-household and household premises be coordinated. Respondents note the importance of coordination to ensure consistent messaging to the public, which may increase compliance and reduce contamination of recycling streams. Respondents also suggest that coordination may increase efficiencies across household and non-household collections.

Many respondents suggest coordinating with the front of store retailer collections of plastic film to help understand commercial market opportunities.

Many respondents suggest regular review of the changing landscape for plastic film, and emphasise the importance of small-scale pilots, trials, and initiatives to understand new developments, including changing technologies. Respondents suggest that such pilots and trials will help to understand the rapidly changing landscape and identify how changes may impact the logistics of collecting and sorting plastic film material from businesses.

Some respondents suggest that, given the potential impact of Extended Producer Responsibility, plastic film should be considered a target material for phasing out. Respondents suggest that focus be given to how to move plastic film up the waste hierarchy through reuse, redesign, and removal rather than creating a new recycling stream.

A few respondents suggest Government undertake a full assessment of current

infrastructure to identify what is required to enable the reduction, reuse, and recycling of plastic film and develop a clear action plan. Respondents suggest that trials may be useful to test infrastructure capability and identify best practice.

A few respondents suggest that a phased approach may be sensible for plastic films given current lack of recycling infrastructure, the lack of data on composition of plastic film, and unclear potential end markets.

21.2. Question 49

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

This question was answered by 400 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Lack of storage	10%	0%	33%	0%	0%	11%
Concerns Inadequate infrastructure	9%	2%	23%	0%	6%	17%
Concerns Availability of end markets	7%	0%	20%	0%	10%	14%
Support General	5%	2%	1%	20%	23%	6%
Concerns Viability of film collections from small and micro-businesses	4%	0%	16%	0%	0%	0%

Support

Many respondents express support for the inclusion and plastic film recycling and emphasise that this should happen as soon as possible. Respondents suggest that all barriers to the recycling of this material are removed to encourage implementation.

Concerns

Many respondents express concerns about internal and external storage space for businesses and highlight that this will be particularly challenging for micro and small businesses.

Many respondents express concerns about the scale of change and investment.

Respondents suggest that Government works with industry to ensure a systems-wide transition takes place, including the development of end markets and improvements in reprocessing and recycling infrastructure.

Many respondents express concerns about the availability of end markets and the need to incentivise and stimulate development. Respondents express further concerns about the low reprocessing and commodity value of plastic film and the need to avoid reliance on export markets.

Some respondents express concerns about the lack of detail in the proposal, including unclear definitions and classification of the various polymer types, and lack of clarity about issues such as storage. Respondents suggest that greater understanding of the challenges and solutions of collecting plastic film from non-household premises are required, including issues of volume and frequency. However, respondents suggest that producers are well placed to lead innovations and identify solutions in this area.

Some respondents express concerns about the environmental impact of increased collections and whether there will be any carbon benefit. Respondents express concerns about viability of collecting plastic film from all businesses and suggest waste collection organisations require flexibility to collect only from businesses producing sufficient waste to justify the service. Respondents also suggest the use of on-site compaction methods for businesses to reduce collection frequencies.

Some respondents express concerns about the viability of collecting plastic film from small and micro businesses in the short to medium term given the lack of sorting infrastructure and clear end markets.

A few respondents express concerns about the cost burden of recycling plastic film, particularly when collecting from micro businesses, and point to the increased financial burden this place on businesses at an already challenging time. Respondents express concerns about the potential for increased use of 'bring banks' and recycling centres by businesses either unable to store waste or not served by a provider, which may in turn result in increased use of recycling credits used for non-household waste.

A few respondents express concerns about the uncertainty caused by the wide range of Government proposals, and potential financial risk these pose, which they feel might undermine large-scale investment.

A few respondents express concerns about contamination, leading to commodity loss across different recycling streams. Respondents also express concerns about the number of vehicles required to carry out the collections and the subsequent impact on the UK road network, especially in housing areas.

A few respondents express concerns about the need to adapt vehicle designs and reconfiguration of collection rounds.

Suggestions

Some respondents suggest that household and non-household collections are aligned to increase consistency of messaging and service efficiencies.

Some respondents suggest that Government ensure alignment with Extended Producer Responsibility to ensure the payments support costs incurred in overcoming any

challenges and incentivise investment.

Some respondents suggest that clear communication and guidance is required to support businesses to collect and present waste correctly, and further suggest that incentives and enforcement could be used to increase compliance. Respondents suggest that waste collectors should be able to reject loads that are extensively or repeatedly contaminated, and that they should have the ability to charge businesses for any additional processes required due to contamination.

Some respondents suggest that Government develop best practice for businesses to help them understand how to recycle plastic film.

Some respondents suggest that Government focuses on solutions for developing a world-class recycling system and looks to encourage the schemes already in place across a range of businesses.

Some respondents suggest that it is critical that plastic film is collected separately from paper and board for recycling to drive quality of recycled paper and board, reduce contamination, and increase the overall recycling rate.

Some respondents suggest that the timing of changes should be led by the local authority based on their resource capacity. Respondents suggest that behavioural campaigns will be important to educate customers.

Some respondents suggest that special streams will be required to collect non-contaminated plastic film from hospital waste.

A few respondents suggest that more focus should be given to the waste hierarchy, including removal, reduction, and reuse.

A few respondents suggest the collection of co-mingled waste is more realistic for small and micro businesses.

22. Proposal 19: On-site food waste treatment technologies

22.1. Question 50

22.1.1. Do you agree or disagree with Proposal 19?

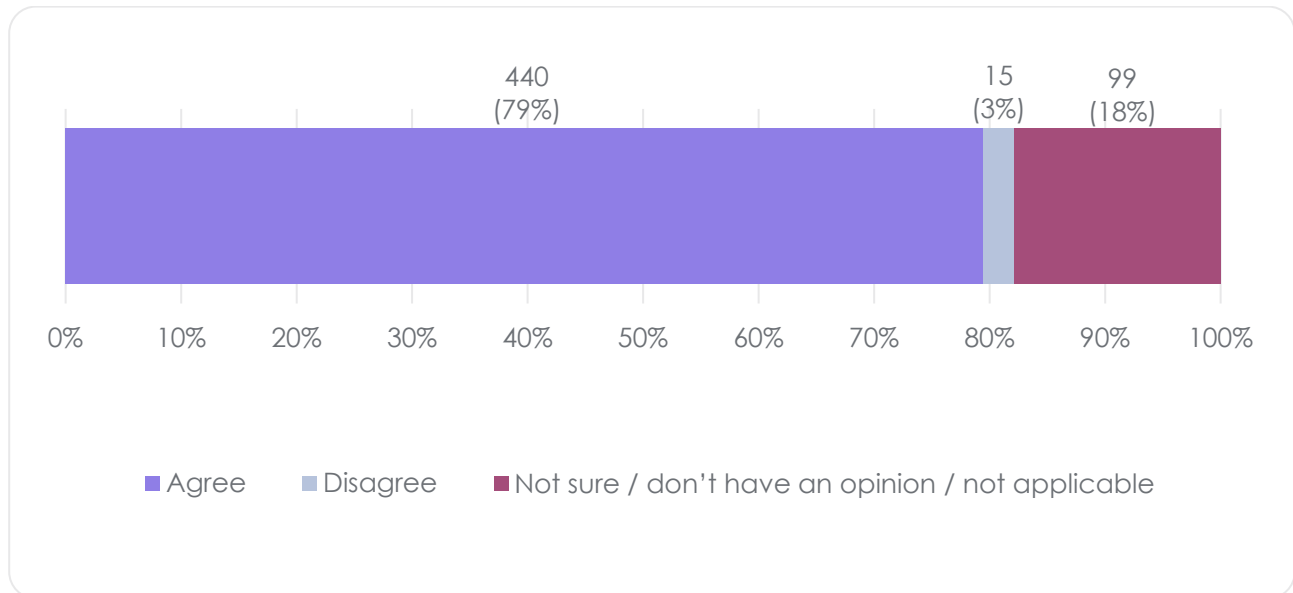


Figure 47 Question 50, (n=554)

22.1.2. Comments

Question 50 was a closed question which did not give space for comments. However, some respondents made comments in emails, or in response to other questions, which were labelled as being for this question. Their comments are summarised below.

Support

Some respondents express general support for requiring businesses to recycle their food waste. Some respondents include a caveat that the business should be collecting sufficient quantities of food waste, though they do not quantify what may be deemed 'sufficient'.

Concerns

Some respondents express concerns over whether sufficient end markets for food waste exist, with most of these respondents suggesting that Government should clarify which end markets for food waste will count towards the nation's 'overall recycling', without specifying further.

Some respondents express concerns that some small businesses may already use kitchen sink grinders to dispose of food waste without obtaining the necessary consents and suggest that Government should avoid encouraging more businesses to install these devices. Respondents also question whether on-site treatment contributes to food waste prevention.

Some respondents express concerns that smaller businesses such as small rural pubs may

not have access to commercial food waste collections, so their choices may be limited to the services provided by their local authorities.

A few respondents express concerns that the costs of operating on-site food waste treatment may be challenging to businesses. They believe that costs may be obscured if capital expenditures and operating expenses are met out of shared cost centres or budgets, such as maintenance or utilities infrastructure, without specifying further.

A few respondents express concerns that fast food restaurants may find it difficult to separately collect front-of-house food waste and suggest that Government should allow packaging contaminated by food to be composted. Others express concerns that some businesses are not separating their waste even when local authorities are providing them with the option.

Suggestions

Some respondents express support for separate food waste collections from businesses and suggest that Government should consult water companies to consider which food waste solutions should no longer be accepted under waste reforms.

Some respondents suggest that, in order to ensure compliance with the proposal, Government should reassess and update the range of checks carried out by environmental health officers.

A few respondents suggest that, where space allows, businesses should run on-site energy for waste plants to dispose of their non-recyclable waste.

A few respondents suggest that businesses should be able to decide whether they use a waste management company or bear the cost of operation themselves, without specifying further.

22.2. Question 51

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

This question was answered by 368 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Let businesses decide	9%	1%	28%	0%	6%	6%

Support General	4%	2%	7%	2%	13%	3%
Suggestions Other	4%	2%	6%	0%	10%	0%
Concern Other	3%	1%	5%	6%	6%	3%
Suggestions Benchmark performance / deliver value	3%	3%	1%	14%	0%	0%

Support

Many respondents express general support for Proposal 19, with some believing it may help to improve recycling performance, reduce greenhouse gasses, and divert waste from landfill.

A few respondents also express support for the proposal because they believe that cost efficiency and performance quality should be the main goals of food waste treatment.

Concerns

Some respondents express concerns about collection and reprocessing costs and suggest that Government should provide funding to cover them.

Some respondents express concerns that current infrastructure may not have sufficient capacity to deal with food waste being collected from all homes and businesses, and that the need for new infrastructure may make the proposed timescale difficult to achieve.

A few respondents express concerns about a perceived lack of detail in the proposal about how commercial and industrial food waste will be dealt with, whether businesses will be expected to carry on with their own waste management contracts, and the definition of household-like waste.

A few respondents express concerns about the length of time between food waste collections from businesses, which, if too long, may lead to issues with hygiene, smell, and pests.

Suggestions

Many respondents suggest that businesses should be able to decide whether they use a waste management company or if they cover the costs of operations themselves.

Many respondents make several other suggestions for implementing the proposals, including:

- promote anaerobic digestion as the best outcome for the food waste stream;
- focus on reducing food waste; and
- provide appropriate guidance to businesses.

Many respondents suggest banning macerators due to concerns about fatbergs and the potential consequences of sewers flooding.

Some respondents suggest that Government should learn from Scotland's experience, which they believe demonstrates the importance of ensuring quality output, benchmarking performance, and delivering value.

Some respondents suggest a variety of alternative food disposal solutions, such as exempting businesses that recycle waste independently from food waste collections and allowing biomass energy producers to collect waste from businesses that cannot treat food waste on-site.

Some respondents suggest that the sewer system should only be used as a last resort, because they believe it is not designed for food waste and has a limited capacity that could easily be overwhelmed.

A few respondents suggest introducing a formula to estimate the amount of food waste produced by smaller non-food related businesses as it may be impractical to weigh the waste. The formula could be based on the size of the business and evidenced through waste transfer notes, or the number of bags collected.

A few respondents suggest that changes to the planning system and significant infrastructure investment may be needed to support collections on the proposed scale.

23. Proposal 20: Reducing barriers to recycling for non-household municipal waste producers

23.1. Question 52

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

23.1.2. Communication

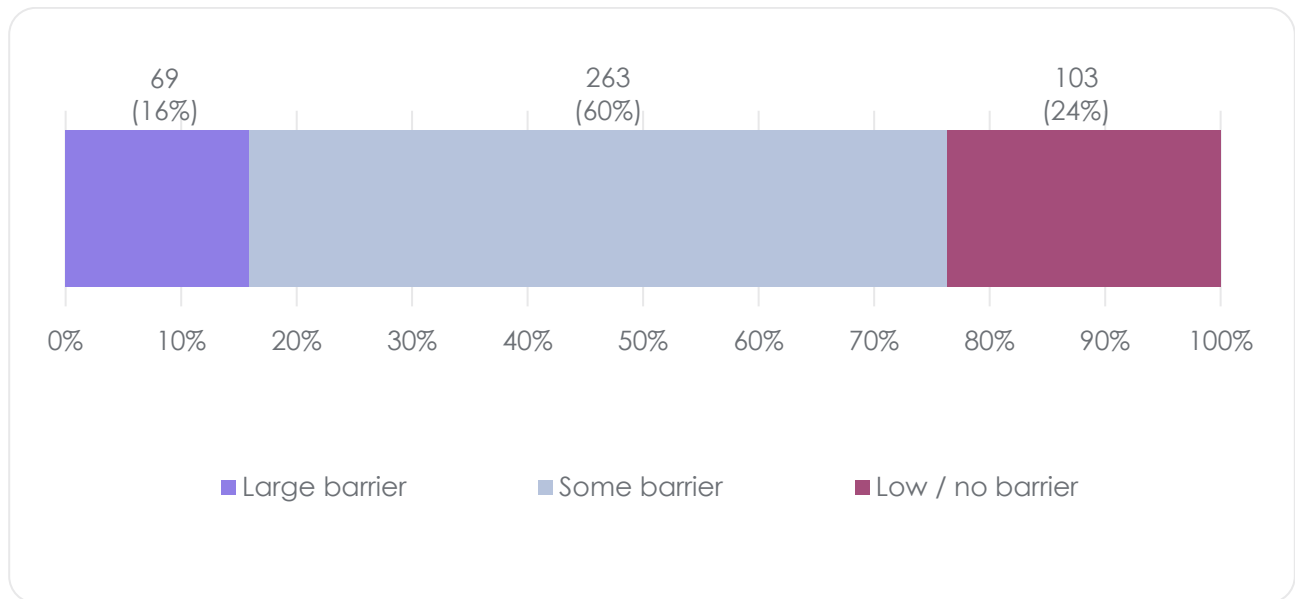


Figure 48 Question 52, communication, (n=435)

23.1.3. Financial

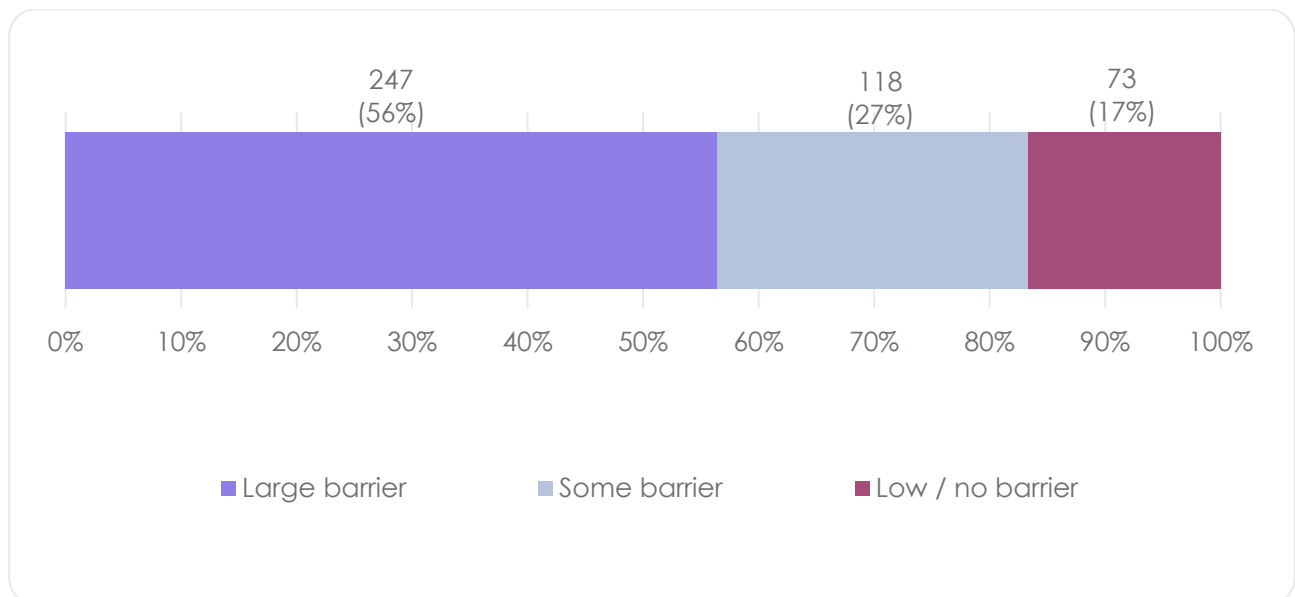


Figure 49 Question 52, financial, (n=438)

23.1.4. Space

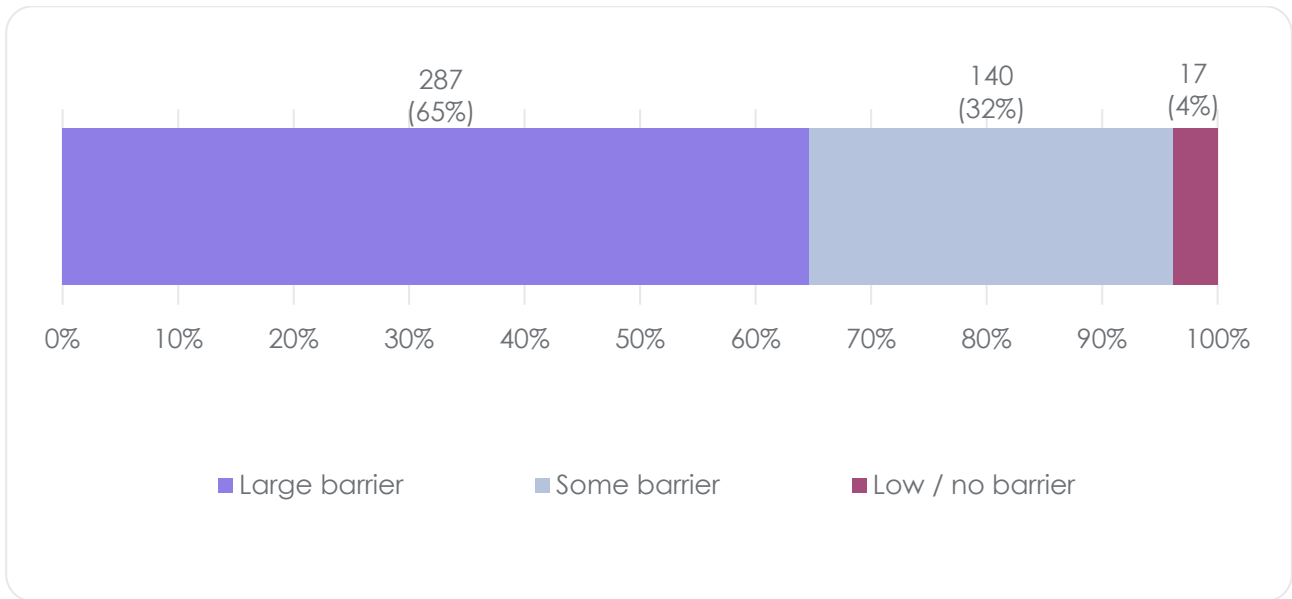


Figure 50 Question 52, space, (n=444)

23.1.5. Engagement

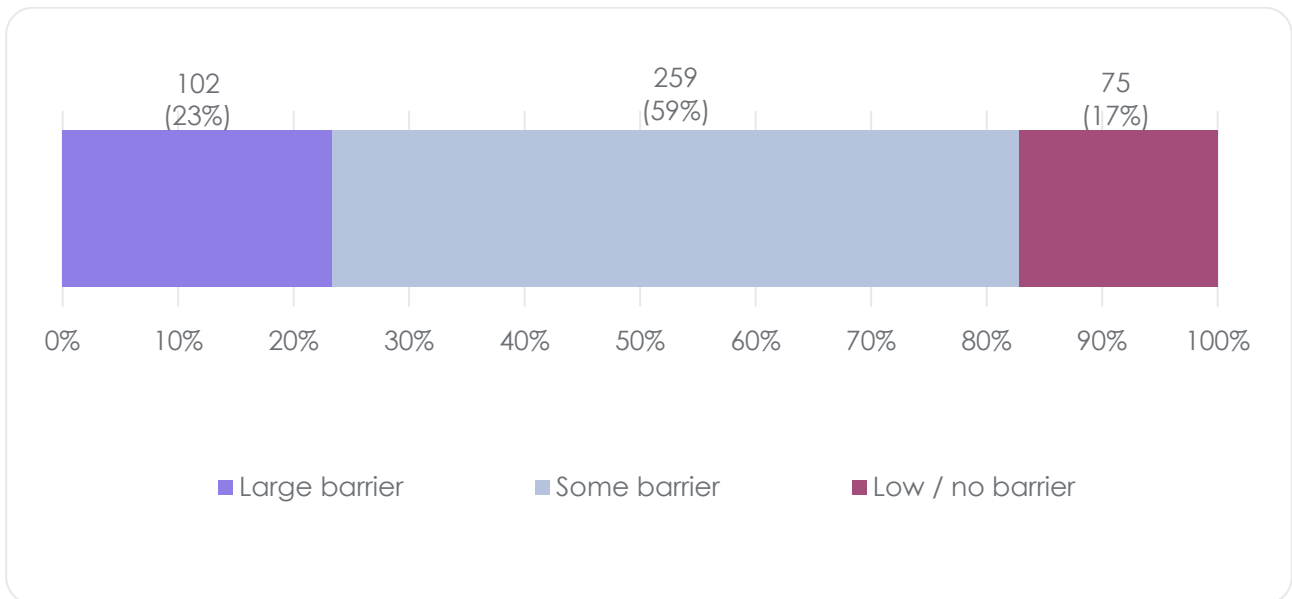


Figure 51 Question 52, engagement, (n=436)

23.1.6. Drivers to segregate waste

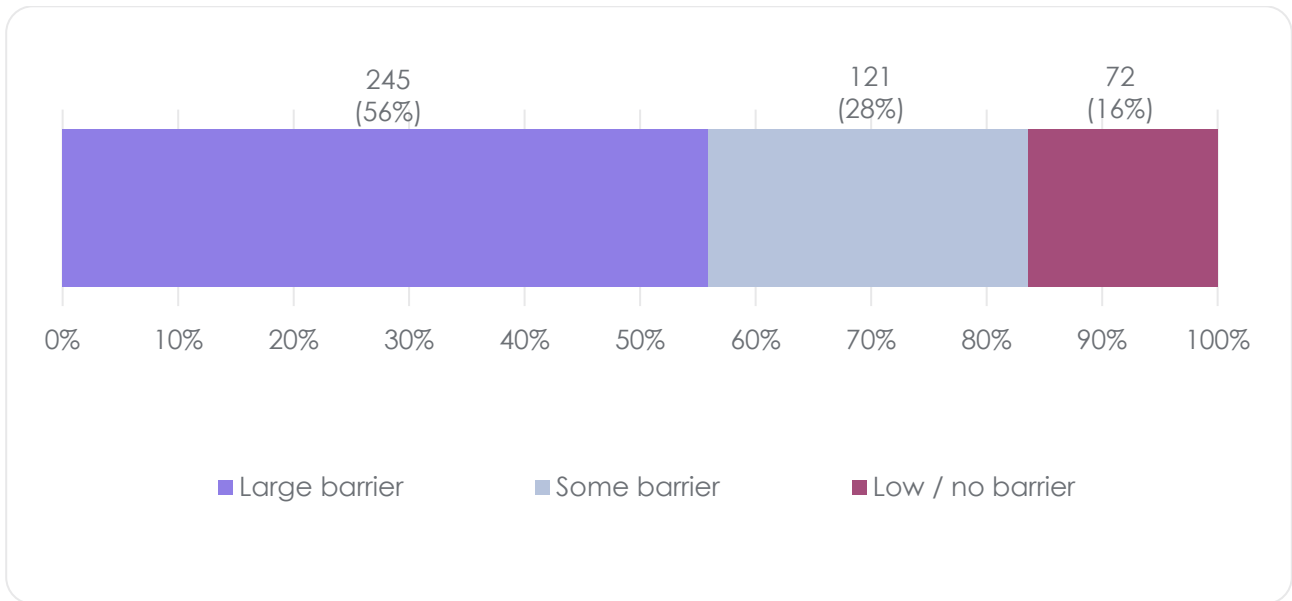


Figure 52 Question 52, drivers to segregate waste, (n=438)

23.1.7. Location

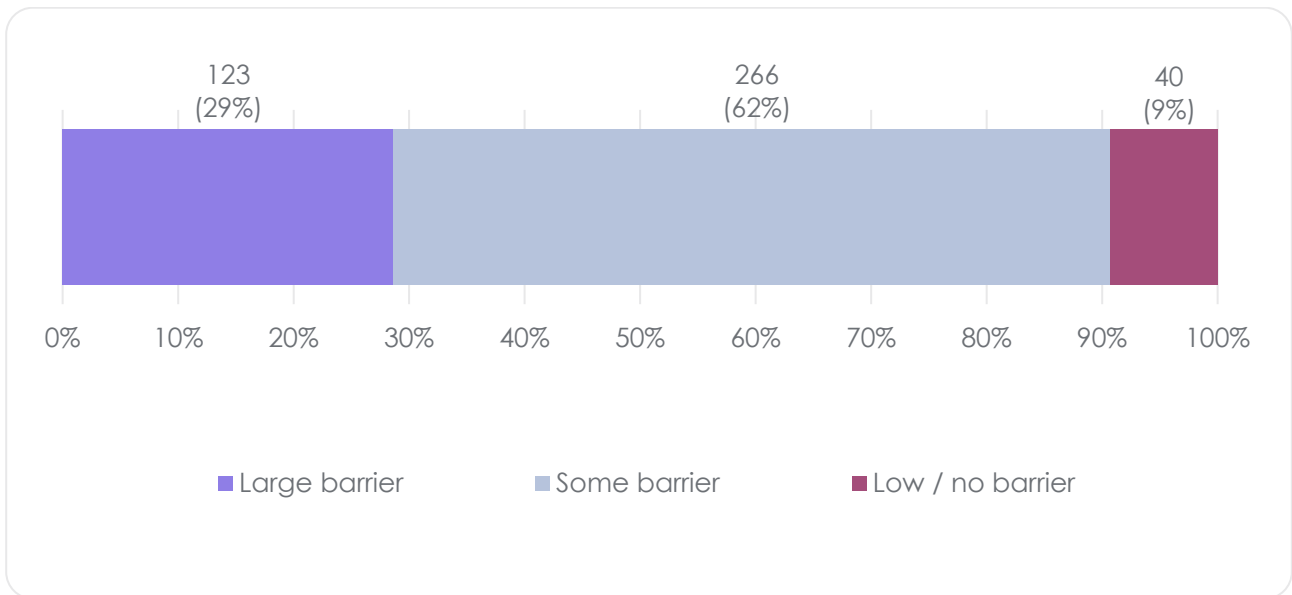


Figure 53 Question 52, location, (n=429)

23.1.8. Enforcement

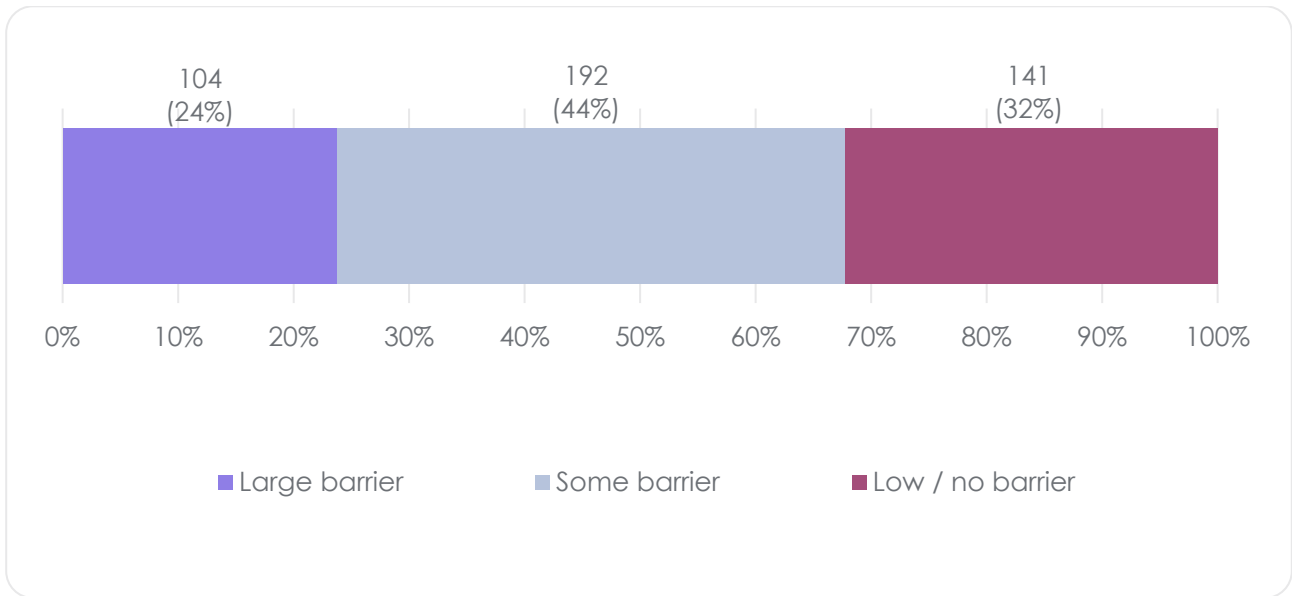


Figure 54 Question 52, enforcement, (n=437)

23.1.9. Variation in bin colours and signage

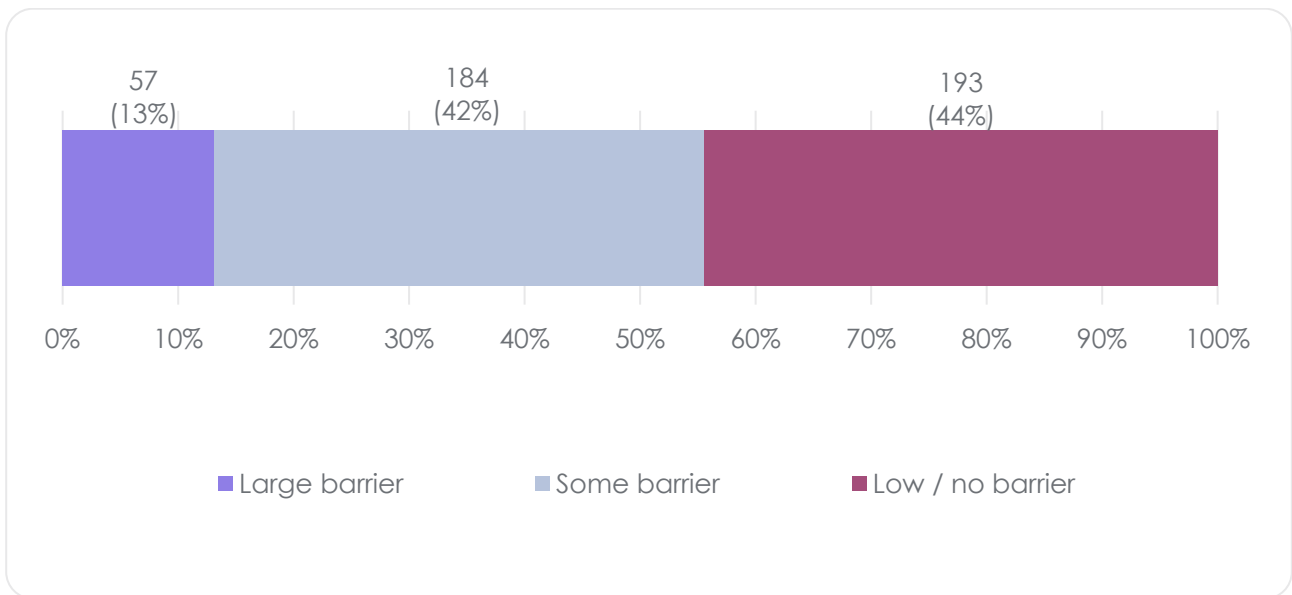


Figure 55 Question 52, variation in bin colour and signage, (n=434)

23.1.10. Contractual

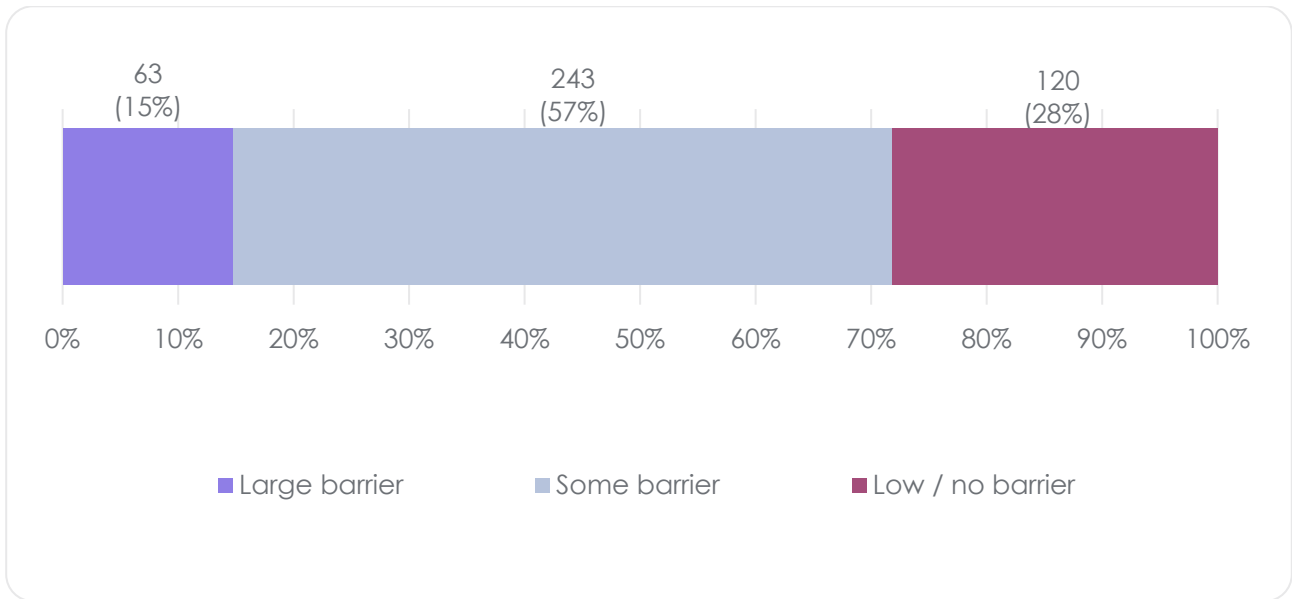


Figure 56 Question 52, contractual, (n=426)

23.1.11. Staff / training

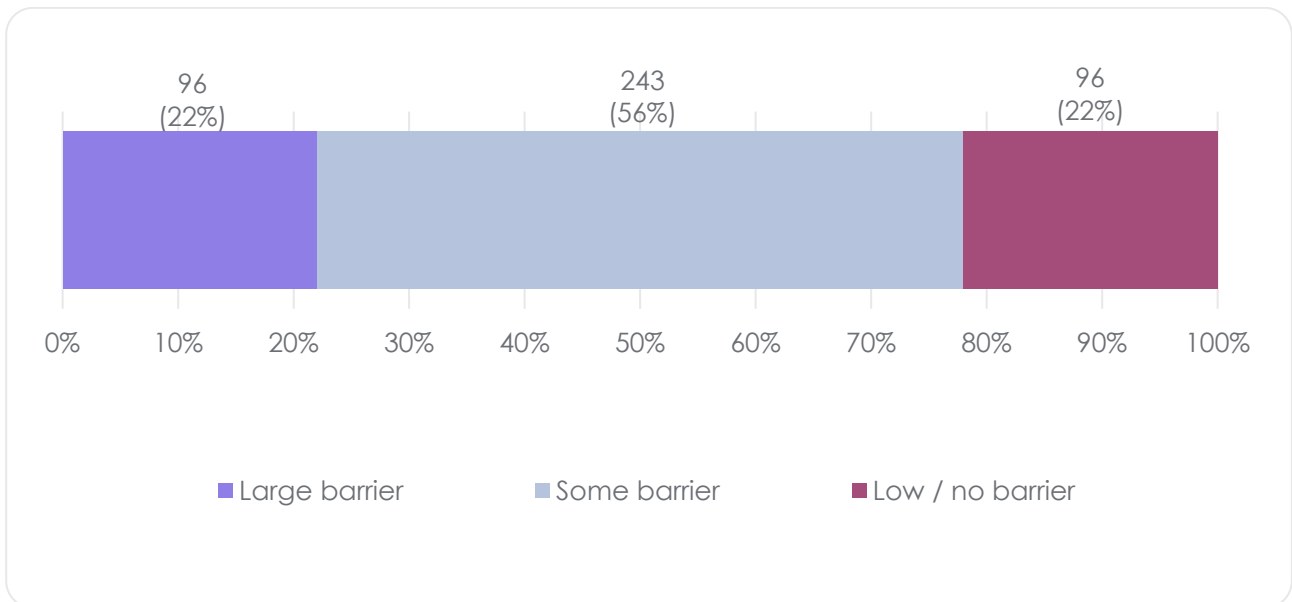


Figure 57 Question 52, staff/training, (n=435)

23.1.12. Other

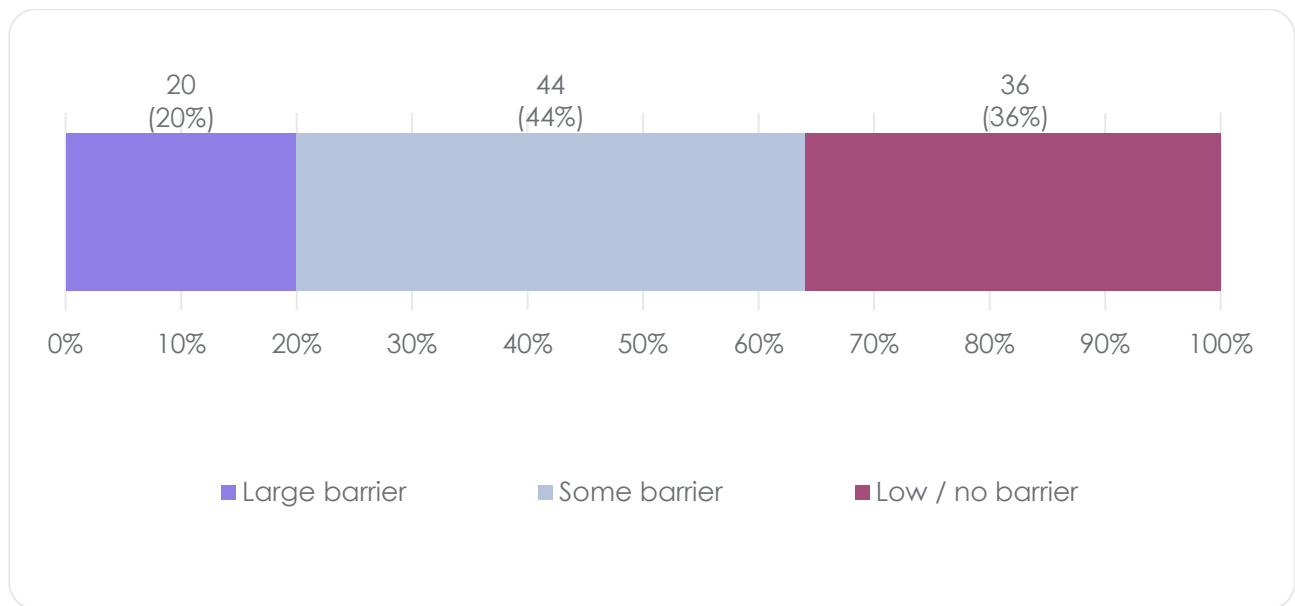


Figure 58 Question 52, contractual, (n=100)

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

Question 52 had three parts. The first part was a closed question which asked respondents to indicate the extent of the barrier that various options present to businesses recycling more. The second part asked 'If you have selected other above, please specify', and the third part asked 'Please provide any comments on how these barriers can be overcome.' These last two parts are reported on together below, as answers given to the third part of the question expanded on answers to the second part, and because some respondents answered both parts in one.

This question was answered by 343 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Provide more education (general)	17%	2%	46%	2%	3%	11%

Suggestions co-mingled collection (consistent with household collections)	16%	1%	43%	0%	6%	22%
Suggestions Enforcement (general)	12%	2%	34%	0%	3%	14%
Suggestions Training/staff	10%	1%	29%	0%	3%	0%
Suggestions Location	7%	0%	24%	2%	0%	3%

Support

Some respondents agree with concerns expressed in the proposal that existing contracts may need to be changed or cut short to accommodate recycling reforms, so may serve as a barrier to recycling. Other respondents believe that contractual arrangements can be opaque, which may allow waste collectors to get away with bad habits such as mixing waste that has been separated by the waste producer.

A few respondents agree with concerns expressed in the proposal that variations in container colours and signage between areas may be confusing and act as barriers to consistent recycling.

A few respondents agree with concerns expressed in the proposal that businesses engagement may be a barrier to recycling, without explaining their responses in more detail.

A few respondents express concerns that all factors mentioned in the consultation may act as barriers to recycling.

Concerns

Many respondents express concerns that barriers to recycling may become excuses for delaying reforms and believe that any obstacles should be treated as challenges to be overcome.

Some respondents express a range of other general concerns, including the potential contamination of recycling waste from businesses, the time required for staff to sort waste, the availability of end markets, and private contractors who may collect more valuable waste and leave local authorities to dispose of less valuable material.

A few respondents express concerns that waste collectors may provide services that prioritise generating revenue over meeting the varied needs of different businesses.

Suggestions

As this question explicitly asked for suggestion of barriers and how they could be overcome, many respondents suggest a range of different barriers for consideration:

- **Lack of sufficient staff training** may be a barrier that businesses face when attempting to recycle. Respondents also believe that Waste Collection Authorities may need additional staff to educate businesses and enforce recycling guidelines.
- **Businesses in rural areas may be limited** in the types of recycling services they

can access.

- **Small businesses may face the greatest barriers** to recycling and may not produce enough waste for a waste contractor to justify dealing with them.
- **Space constraints at business premises**, for example if additional containers are required.
- The **financial costs of commercial collections and staff training** or engagement may be a barrier to recycling.
- **Contractor-specific zoning**, and if customers cannot switch providers due to poor service, this may reduce service quality.
- **Timings of collections** - that if non-household waste, collections occur before opening times, then businesses may leave their collections on the street overnight, potentially increasing litter or causing trip hazards.
- **Hygiene and public health**, depending on how waste is stored (though without specifying further).
- **Location**, for example, businesses in rural areas may be limited in the types of recycling services they can access, and some locations may contain a mix of businesses with different opening times or waste types and quantities.

Many respondents also had a number of suggestions for how the perceived barriers could be overcome:

- **Clear and consistent communications and guidance** about recycling, including the legal obligations of small businesses, may be needed to educate businesses and encourage participation.
- **Local authorities may benefit from enforcement powers** to encourage behaviour change.
- **Co-mingled collections from small and micro businesses** may be necessary and believe that these could align with household waste collections.
- **Government could provide support for businesses** starting to recycle, as well as long-term incentives for continuing to recycle.
- **Zoning could be used** to ensure that recycling systems and container colours remain consistent in a specific area.
- **Space and location constraints could be overcome** by shared facilities or a reduced fee for using recycling sites.
- **Introducing tighter planning requirements** to try and ensure that new buildings can accommodate waste arrangements.
- **Increasing funding for local authorities to encourage waste collectors to analyse their customers' waste**, in order to support businesses in understanding their waste outputs and to help local authorities deliver tailored services.
- Some respondents make a **number of other suggestions** for how barriers to recycling could be overcome, such as limiting the amount of waste that is collected; allowing flexibility in collection methodologies; and mandating local authorities to collect waste from micro businesses that only require 240L wheelie bins.

Other suggestions

Some respondents suggest that the barriers to recycling identified by businesses should be

given precedence over responses from other stakeholders.

A few respondents suggest that all stakeholders, including the Extended Producer Responsibility Scheme Administrator and producers obligated under Extended Producer Responsibility, should convene to discuss any issues that are raised in the Consistency in Household and Business Recycling consultation.

A few respondents suggest using a digital tag and trace system to monitor the contents of containers and help producers use the right containers.

24. Proposal 21: Exemptions and phasing for micro-firms

24.1. Question 53

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

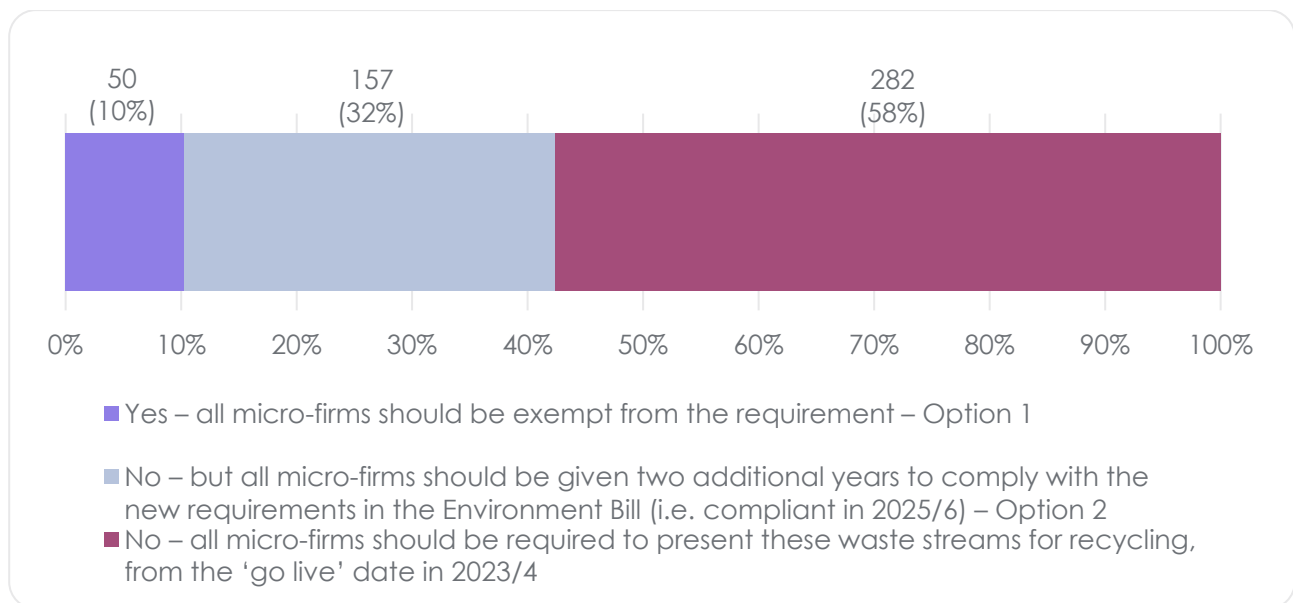


Figure 59 Question 53, (n=489)

24.1.2. Provide any evidence to support your comments

This question was answered by 338 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Should present those waste streams from go-live date Should be consistent	11%	0%	34%	0%	10%	14%

Suggestions Alternative approach	9%	1%	24%	10%	3%	11%
Concerns Opposition to exemptions	8%	5%	9%	20%	0%	14%
Concerns Operational challenges for micro-firms	7%	0%	22%	0%	0%	6%
Suggestions Include micro-firms in household collections	7%	2%	9%	14%	6%	14%

Support

The following reasons are given for stating that all businesses including micro-firms should present five waste streams from the go-live date in 2023/24:

- Many respondents state **collections are best optimised when the same service is delivered to all customers**, households, and non-households. Respondents state that they believe it is important that employers and employees will be asked to adhere to the same requirements at work and at home.
- Many respondents state that in practice, **employees will do it at home anyway**, or it would be no different than expecting households to conform. Respondents state that the timescale requirements for micro-firms and households to move away from co-mingled collection should be aligned.
- Some respondents state a general view that all micro-firms should be required to present five waste streams for recycling, from the 'go live' date in 2023/24 without further clarification.
- A few respondents state that **if Option 1 or 2 were chosen, then 10% of non-household municipal recycling rates will be missed**, or that the inclusion of micro-firms from the start is the only way to significantly increase the volume of materials recycled.
- A few respondents state that **micro-firms do not produce much waste and will have minimal issues in complying**, or that many office locations have access to communal waste facilities provided by their building.

The following reasons are given for supporting Option 2 that all businesses including micro-firms should be given two additional years to comply:

- Some respondents express general support for Option 2, that all micro-firms should be given two additional years to comply (i.e compliant in 2025/26).
- Some respondents state that more time will help micro-firms adjust to the cost burden, apply TEEP appropriately, or make budgetary provisions.

Many respondents express general support for Option 1, that all micro-firms should be exempt from the requirement. Their reasons for believing this include:

- Concerns that there will be **operational challenges** for micro-firms and local authorities if micro-firms are not exempt from the requirement to present the five recyclable waste streams for recycling.
- Concerns there will be **practical challenges** to supporting the segregation of waste streams for micro-firms, because of a lack of space and storage capacity

for multiple containers.

- Concerns that there will be **significant cost burdens** for business or local authorities. Respondents state that significant investment by waste collectors will be required and express concerns about how much of this can be recouped through New Burdens or Government funding.

Concerns

Many respondents express concerns and opposition to the suggestion of awarding of exemptions to micro-firms. Respondents state that no exemptions should be awarded to any business, regardless of size. Other respondents state that awarding exemptions to micro-firms would endanger consistency, higher recycling rates, increased resource efficiency, a more circular economy.

Some respondents express concerns about the proposals on exemptions and phasing for micro-firms in relation to the following:

- the proposed timeline;
- enforcement;
- definition of a micro-firm;
- difficulties categorising micro-firms; and
- a perceived lack of detail in the consultation.

A few respondents express concerns about awarding exemptions to micro-firms based on employee size, as they believe the number of employees is not a good indicator of the amount and type of waste generated. Respondents state that exemptions for micro-firms should be based on the amount of waste they produce.

A few respondents express concerns that allowing micro-firms to be exempt from the requirement to present the five recyclable waste streams for recycling will lead to issues with compliance and misuse for the wider public. Respondents state that employees may bring in their waste from home, or that neighbouring households might also start to demand exemptions or fail to comply. Respondents state that if micro-firms are not exempt, local authorities will need to establish effective checking and enforcement procedures.

Suggestions

Many respondents make a range of suggestions about alternative approaches to blanket exemptions for micro-firms. Respondents suggest that a different assessment process for micro-firms should be devised. Other respondents suggest that micro-firms should be able to use recycling sites for a small fee, or that a collection bag service could be run instead.

Many respondents suggest that micro-firms' waste could be collected alongside household recycling collections. Respondents state that micro-firms' waste is similar to household waste in terms of volume and composition, and that collecting these together would enable clear communication, reduce costs and improve system performance.

Some respondents suggest that micro-firms should be provided with incentives to provide five recyclable waste streams. Respondents suggest that technical training or financial support, like subsidies or preferential pricing, could be offered to ensure they are not disadvantaged by dealing with waste appropriately.

Some respondents suggest that further research is needed in relation to the following:

- ways to describe small and micro-firms that relate to their waste production;
- how the duty of care system operates;
- TEEP implications; and
- the potential impacts on micro-businesses.

Some respondents make various other suggestions about recycling for micro-firms. For example, respondents suggest

- allowing micro-firms to have co-mingled waste streams;
- implementing the five recyclable waste streams immediately;
- having the same implementation date for all businesses;
- launching an educational programme; and
- providing clear guidance for micro-firms.

A few respondents suggest that micro-firms could automatically be obligated to present the five recyclable waste streams, but that they could also have the opportunity to apply for an exemption. Respondents suggest that reasonable grounds for exemption could be based on volume/ tonnage.

24.2. Question 54

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

This question was answered by 424 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns No other premises should be exempt	24%	8%	53%	24%	29%	22%
Concerns Oppose exemptions	10%	5%	11%	20%	16%	19%
Suggestions Other	3%	0%	9%	0%	0%	6%
Concerns Funding/financial costs/investments	3%	0%	5%	4%	0%	3%

Concerns Lack of detail in proposal/further research needed	2%	0%	7%	0%	0%	0%
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Support

Many respondents offer no other examples of non-household municipal premises for exemption.

Concerns

Some respondents express concerns about and opposition to awarding exemptions to non-household municipal premises. Respondents state that rather than seeking exemption, the focus should be on ensuring business participation. Respondents state that there should be no exemptions, because:

- they believe the aims of Consistency in Household and Business Recycling would be undermined by exemptions;
- awarding exemptions could go against the 'polluter pays' principle;
- different regulations at home and at work could lead to confusion; and
- all waste generated needs to be collected and processed.

Some respondents specifically express concerns and opposition to awarding exemptions to micro-firms. For example, respondents state that there should be no exemptions for micro-firms, that the majority of businesses are classed as micro so a large proportion of annual waste could be missed, and comment that it should be as easy for micro-firms to comply as it is for households.

A few respondents express concerns about the financial implications of awarding exemptions to non-household municipal premises. For example, respondents state that performance requirements for packaging Extended Producer Responsibility do not accommodate exemptions, that New Burdens funding can be spent more efficiently if the requirements for households and non-households are the same, or that poor waste management of businesses creates street scene costs for local authorities. Respondents state that Extended Producer Responsibility funding needs to take account of business rurality.

A few respondents express a range of concerns with a perceived lack of detail in the proposal and/ or call for further research, in relation to the following:

- the impact of the Covid-19 pandemic on homeworking;
- the amount of waste that is commercial in origin but is currently collected in household waste;
- how the waste collection system will be influenced by other proposals; and
- who will manage exemptions?

Suggestions

A few respondents make various suggestions about how exemptions should be decided or managed. For example, that

- the criteria for exemption should be developed;

- rural or inaccessible businesses should be exempt;
- the definition of micro-firms should be changed to include businesses that work from home; and
- that the exemption process should be kept simple.

Some respondents suggest that exemptions for non-household municipal premises should be granted on a case-by-case assessment basis. Respondents suggest that barriers to businesses participating should be individually assessed against TEEP.

Some respondents make a range of suggestions about the types of non-household municipal premises that could be exempt from the requirement. For example:

- flats treated as commercial premises by freeholders and agents;
- registered charities;
- temporary accommodation facilities;
- temporarily occupied / not routinely manned premises;
- NHS / medical facilities.

Some respondents express concerns that some types of premises may have issues relating to their space, or capacity to store multiple containers for the five recyclable waste streams.

25. Proposal 22: Other cost reduction options

25.1. Question 55

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

25.1.2. Dry recyclable waste streams

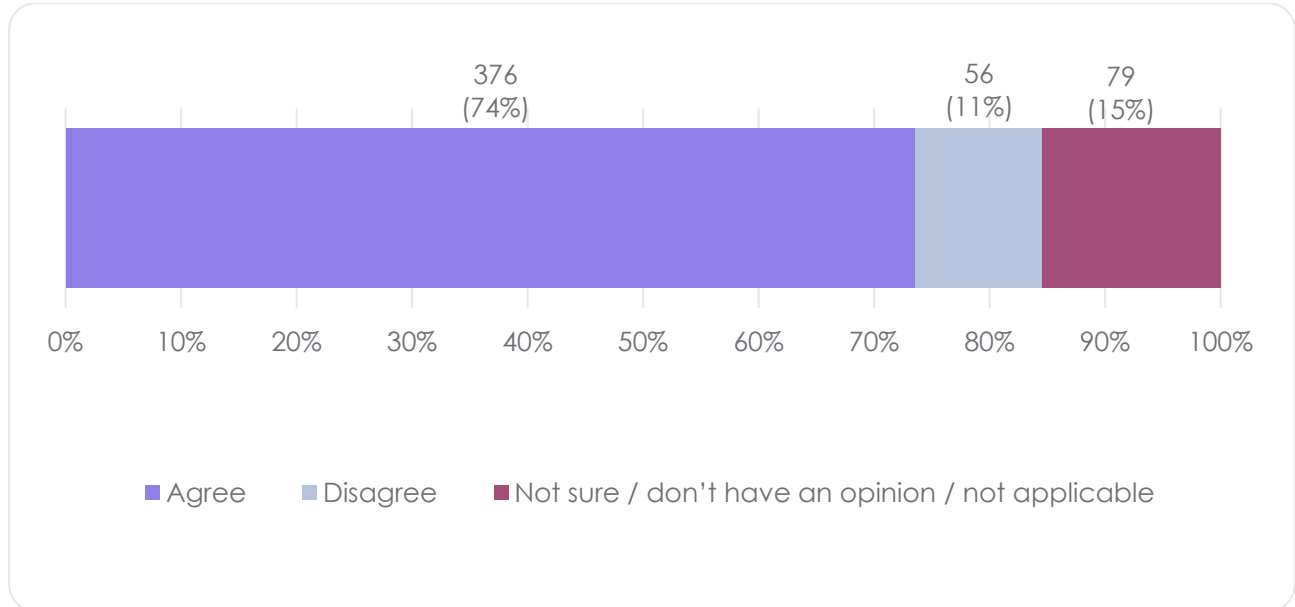


Figure 60 Question 55, dry recyclable waste streams (n=511)

25.1.3. Food waste

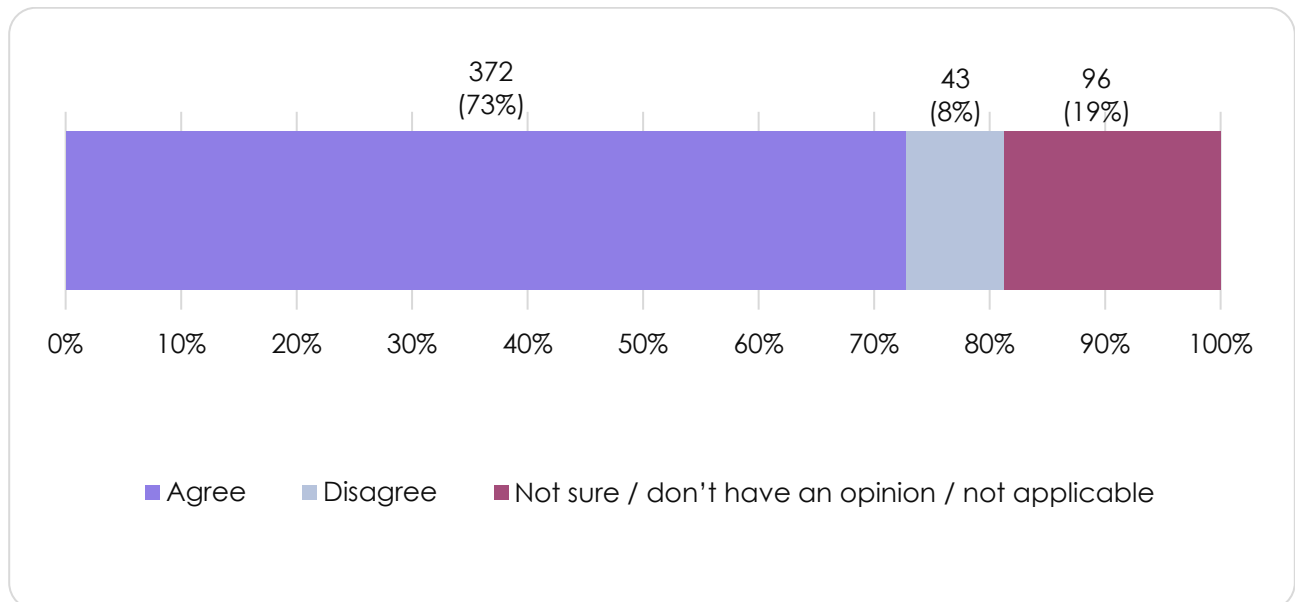


Figure 61 Question 55, food waste (n=511)

25.1.4. Other items e.g. bulky office waste

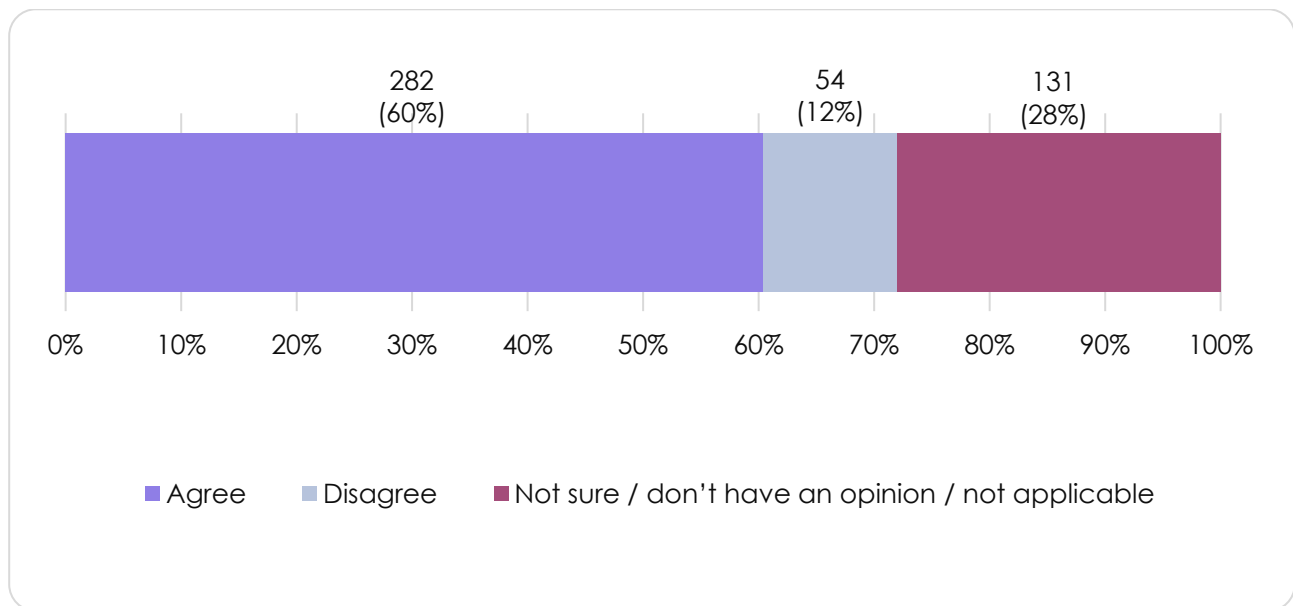


Figure 62 Question 55, other items (n=467)

25.1.5. Comments

This section summarises comments from respondents in response to the option “Other (please specify)”. 205 respondents made comments in response to this question. Their comments are summarised below.

Positive comments

Many respondents express positive comments toward zoning schemes and collaborative procurement, commenting that the standardising of waste management services across a range of customers in an area would provide maximum efficiency and better value for money. Respondents comment that if a robust zoning scheme were to be implemented, it would promote innovation and allow collection providers to spread costs over a wide base, enabling the minimisation of charges to individual businesses.

A few respondents express positive comments regarding the inclusion of dry recyclable waste streams in potential zoning schemes. Some respondents state that only certain dry recyclable materials should be collected however, as some local areas have material specific waste collectors for items like glass and paper.

Concerns

Many respondents express concerns that the proposed approaches could reduce competition in the market and promote monopolies at a local level, commenting that this could drive prices up and potentially cause services to worsen as a consequence. Respondents express concerns that the proposed approaches could disincentivise innovation and unfairly advantage large enterprises whose existing infrastructure and financial strength could price out smaller businesses.

A few respondents express concerns about the proposed zoning approaches, justifying their opposition on the basis that the approaches may be difficult to implement, and could lead to low investment and high prices with no environmental benefits.

Some respondents express concerns that social enterprises might be disadvantaged by the bidding process for zoning schemes and ask that social value be considered as a factor in the bidding process.

A few respondents express general concerns and opposition to the introduction of a zoning scheme. Some respondents express concerns that local authorities may face significant burdens overseeing and administering a zoning scheme, due to the increased workload and duty to arrange the collection of waste for all. Other respondents express concerns that the bidding process in zoning schemes could be problematic for local authorities, as it could result in them losing existing business waste customers or create a conflict of interest where local authorities want to submit a bid for the local franchise, they are running the tender for.

Some respondents express concerns and seek clarity about how Government will address potential conflicts of interest where a local authority might be responsible for procurement procedures for non-household waste services while also tendering for the contract.

Some respondents express concerns that the proposals lack detail and require further development, seeking further information on a range of issues such as:

- the types of businesses to be included in a zoning scheme;
- the operation of the zoning model itself;
- the zoning boundaries; and
- the potential impacts on current services, costs, and incomes of local authorities.

A few respondents express concerns and seek clarity about how the zoning approach would work in terms of:

- business density (for both rural and urban areas);
- proportions of different waste types generated by businesses;
- storage capacity at premises;
- the size of zones; and
- collection frequency.

A few respondents express concerns that bulky waste may be less common and therefore uneconomic to collect unless either collection zones were larger in size, or these collections were linked with household bulky waste collections.

A few respondents state that none of the proposed waste streams (dry recyclable materials, food waste, or other items like bulky office waste), should be included in a potential zoning scheme and answered disagree for all options. A few respondents also express general opposition to a zoning scheme.

Suggestions

Many respondents suggest the inclusion of all possible waste streams in any zoning schemes. Respondents express support for any measures to improve businesses' carbon performance, and state that including all waste types would be the most efficient way to implement zoning. Respondents do however feel that, regardless of whether additional collection vehicles are low or zero emission, the increase in vehicles would still result in a negative impact on aspects such as traffic, congestion, vermin, and noise.

Many respondents suggest the inclusion of the following specific items in potential zoning

schemes:

- Furniture, for example office or kitchen furniture, including items such as wooden desks, chairs, units, and mattresses;
- coffee cups;
- textiles, fabrics, and clothing; and
- Waste electrical and electronic equipment (WEEE), including batteries and lightbulbs.

A few respondents express general support for the inclusion of bulky office waste in potential zoning schemes.

Many respondents suggest that they would support a zoning approach if this were based on material type rather than method of collection. Respondents also suggest that there should be more focus on promoting the re-use of bulky office waste to reduce costs.

Many respondents suggest an 'opt-in' approach for collaborative procurement as this may enable businesses to reduce costs while also being able to choose their service provider and change provider if necessary. Respondents also suggest that the development of digital enhancements could facilitate collaboration between all relevant parties in the Extended Producer Responsibility process. They further suggest that digital labelling that meets GS1 standards may drive up efficiencies, enable accurate data collection, ensure transparency, and build trust between producers, waste management organisations and other stakeholders in the Extended Producer Responsibility process.

Some respondents suggest that further research and discussions need to be undertaken before they are able to form a fully informed view on the subject.

A few respondents express concerns about likelihood of local authorities receiving funding through new burdens and suggest that any costs associated with zoning should fall under the remit of Extended Producer Responsibility since, in their view, the majority of waste is likely to be packaging. Respondents comment that the calculation of cost viability for waste collection across the full range of businesses within local authority may require significant analysis and suggest that this analysis would have to be fully funded.

A few respondents suggest that potential schemes should not be compulsory and indicate that local authorities should be able to make the ultimate decision on which approaches are taken within their area, as long as this decision is backed by evidence relevant to the area in question.

A few respondents suggest that Government put Local Enterprise Partnerships and/or Business Improvement Districts in charge of developing the outlined proposals, aided by local authorities who would be able to provide local insight and expertise.

A few respondents suggest that the implementation of a municipal system would facilitate resource planning and route optimisation since the barrier between household and non-household waste would be removed, thereby allowing for co-collection to be the default system.

25.2. Question 56

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

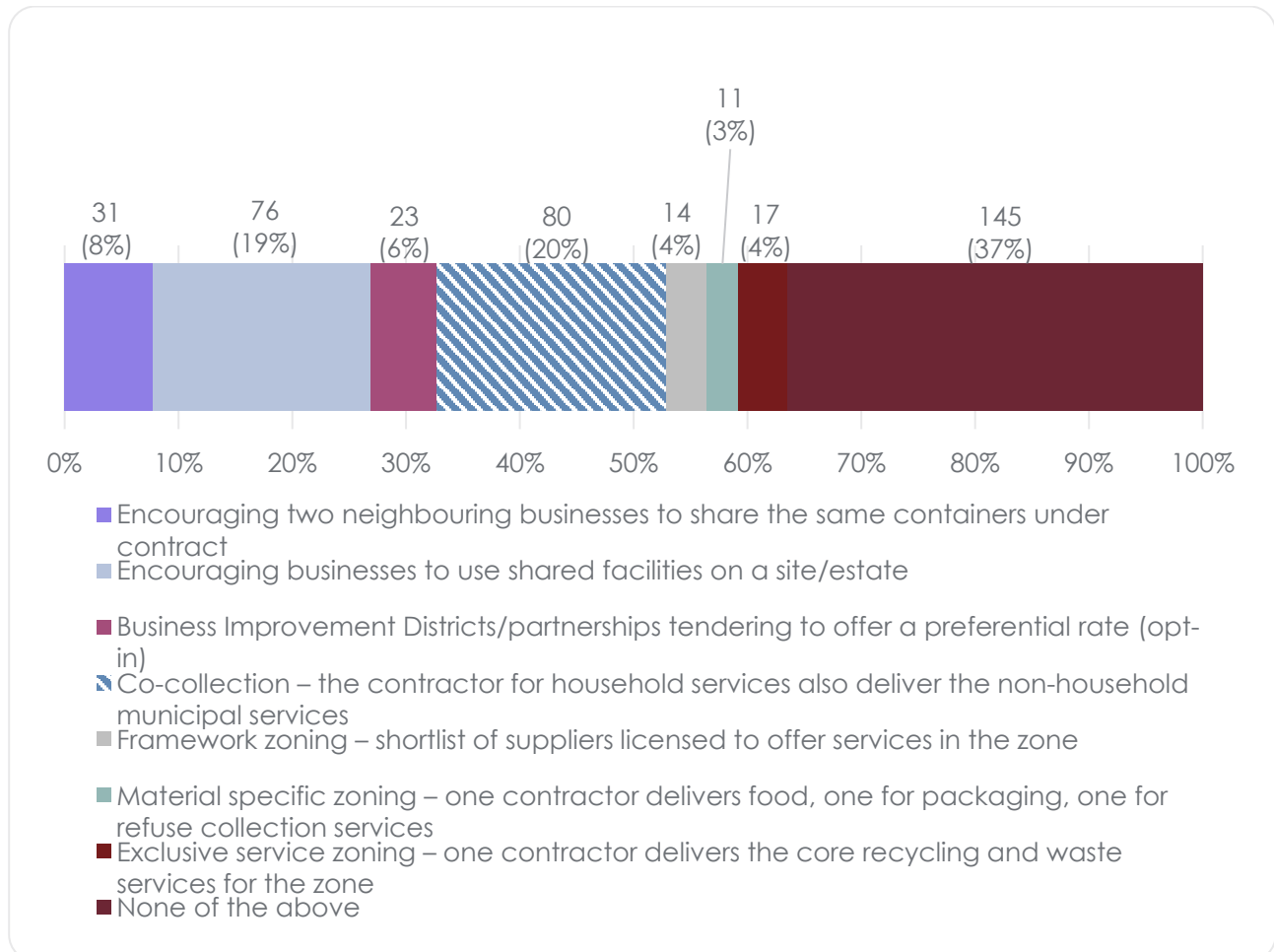


Figure 63 Question 56, (n=397)

25.2.2. Comments

Question 56 was a closed question which did not give space for comments. However, a number of respondents made comments in emails, or in response to other questions, which were labelled as being for this question. Their comments are summarised below.

Support

Many respondents express support for the proposals on the basis that all options could be suitable, depending on local circumstances. Other respondents note that each option has advantages and disadvantages, without specifying further.

Many respondents express general support for encouraging businesses to use shared facilities on a site/estate and encouraging two neighbouring businesses to share the same containers under contract. Respondents comment that some local authorities may already provide communal containers and that these options may be most beneficial to small and micro businesses.

Many respondents express support for Business Improvement Districts/partnerships

tendering to offer a preferential rate (opt-in) as this option may allow businesses to achieve cost reductions and help maintain a competitive market. Respondents further suggest that Business Improvement Districts may play a role in outreach and communications around Consistency in Household and Business Recycling reforms more generally.

Many respondents express general support for co-collection, with a few respondents specifying that this option may reduce the number of collections and therefore also reduce carbon emissions and could be more cost-effective and easier to access than other options.

Some respondents express support for framework zoning. They believe this option is worth pursuing and should be researched as a medium or long-term option.

Many respondents express support for material specific zoning, which they believe may offer the best compromise between maximising competition and collecting the greatest amount of material.

Many respondents express support for exclusive service zoning, which they believe may increase the efficiency and effectiveness of collections, while reducing congestion and improving air quality.

A few respondents express support for zoning in general, which they believe may achieve the best environmental outcomes and be most efficient and effective.

Concerns

Many respondents express concerns about encouraging two neighbouring businesses to share the same containers under contract, including that:

- the current duty of care system may not accommodate shared use and therefore may need to change to reflect joint usage of containers and collections;
- enforcement may be more difficult for shared facilities as it may be difficult to establish which businesses were at fault for any problems with containers;
- less clearly defined responsibilities may lead to issues such as contamination;
- shared facilities may make separate collections more difficult and therefore be better suited to co-mingled collection; and
- this option may run into the same issues local authorities face with collections from flats and houses of multiple occupation.

Many respondents express a variety of concerns about Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in), including that:

- an 'opt-in' system may not be taken up by many businesses;
- Business Improvement Districts may lack the necessary expertise to run and operate such a procurement exercise and may therefore need to rely on local authorities or consultants; and
- Business Improvement Districts may not cover all businesses in the area.

Many respondents express concerns about co-collection, including that:

- some local authorities may not collect commercial waste;

- where local authorities tender out their household collection services, co-collection may increase the size of the contracts or the scale of the procurement exercise, which may require additional resources from local authorities;
- there may be more than one business collection zone in a local authority area; and
- if businesses have to align with domestic collections, they may need to accommodate extra waste containers.

Many respondents express concerns about framework zoning, including that:

- if a local authority does not appear on a framework, their statutory duty to collect business waste would need to be removed;
- local authorities may end up collecting business waste from small and micro businesses even if they are not part of the framework; and
- for framework zoning to be profitable, longer contract periods may be required to enable better prices from bidders.

Many respondents express concerns about material specific zoning, including that:

- managing collections split by material type may require greater resources than other options;
- this option may not reduce the number of collectors in an area, simplify the system, or provide cost-effective services;
- this option may limit innovation opportunities such as twin material collections;
- this option may pose a risk to local authority trade waste services that operate co-mingled collection; and
- this option may require the Environmental Protection Act to be amended so that local authorities no longer have to arrange for collections if requested.

Many respondents express concerns about exclusive service zoning, including that:

- there is a potential risk to local authority trade waste services that co-collect waste from businesses and households and operate co-mingled collection;
- many small and micro businesses may currently rely on local authorities to provide waste services;
- this option may require the Environmental Protection Act to be amended so that local authorities no longer have to arrange for collections if requested;
- there may be competition issues arising from this option; and
- it may disadvantage smaller waste service suppliers.

Concerns (general)

Some respondents express concerns that further research and detail about possible zoning and franchising options may be needed before they can form an opinion. Some respondents ask the following questions about specific options:

- Exclusive service zoning and material specific zoning – would this be managed by local authorities? If a business experiences poor service, would they be able to switch provider, and would the zone manager be responsible for this?
- Framework zoning – who would manage or undertake this? If local authorities did, could their trade waste services be included? and

- Encouraging business to use shared facilities on a site or estate and encouraging two neighbouring businesses to share the same containers – how would costs for disposal be shared, especially if one business produces more waste than another? Who would be responsible for facilities?

Some respondents express concerns that zoning may be difficult to implement in rural areas, without specifying further.

A few respondents express concerns about the burden commercial waste places on the public, referencing problems reported on apps such as FixMyStreet. Respondents express concerns about businesses leaving empty food waste containers on the street overnight, as these may act as tripping hazards.

A few respondents express concerns that zoning may disadvantage existing services run by local authorities in favour of private sector operators. Some are concerned that local authorities may be forced to service areas that are unattractive to private sector operators, without having the funding to effectively do so.

A few respondents express concern that none of the options listed in the proposal are desirable, without specifying further.

Suggestions

Some respondents suggest alternatives to zoning schemes, such as:

- providing businesses with support on how to shop around for services, such as a localised register of licenced waste collection companies and advice on how to get quotes. This option may maintain competition and give businesses choice; and
- use an on-demand model where businesses can book collections via a live online booking service or app.

A few respondents suggest that additional support for zoning could be invested in local authorities but warn that this could be the basis for renewed offers from local authorities operating in the commercial waste sector.

A few respondents suggest choosing the approach that maximises improving air quality through reducing vehicle movements, without specifying which approach may do this.

A few respondents suggest keeping approaches to zoning simple because they believe there are too many unknowns at present, though they do not specify how this could be achieved.

25.3. Question 57

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

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

25.3.3. Please provide explanations where possible to support your above

response.

Question 57 had two open parts to it, shown above. These two parts are reported on together because of the overlap in answers given to each question. Answers across both questions are broken down below by named stakeholder type, followed by more general comments.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Involvement of multiple stakeholders	9%	3%	16%	14%	16%	3%
Support Involvement of LAs and BIDs	8%	0%	24%	0%	0%	6%
Suggestions Relationship with EPR / Scheme Administrator	6%	4%	3%	20%	19%	14%
Suggestions - stakeholders (no explanation) Other	5%	1%	12%	2%	3%	6%
Suggestions Roles for social enterprises / charities / WRAP	5%	1%	14%	0%	0%	6%

25.3.4. Defra

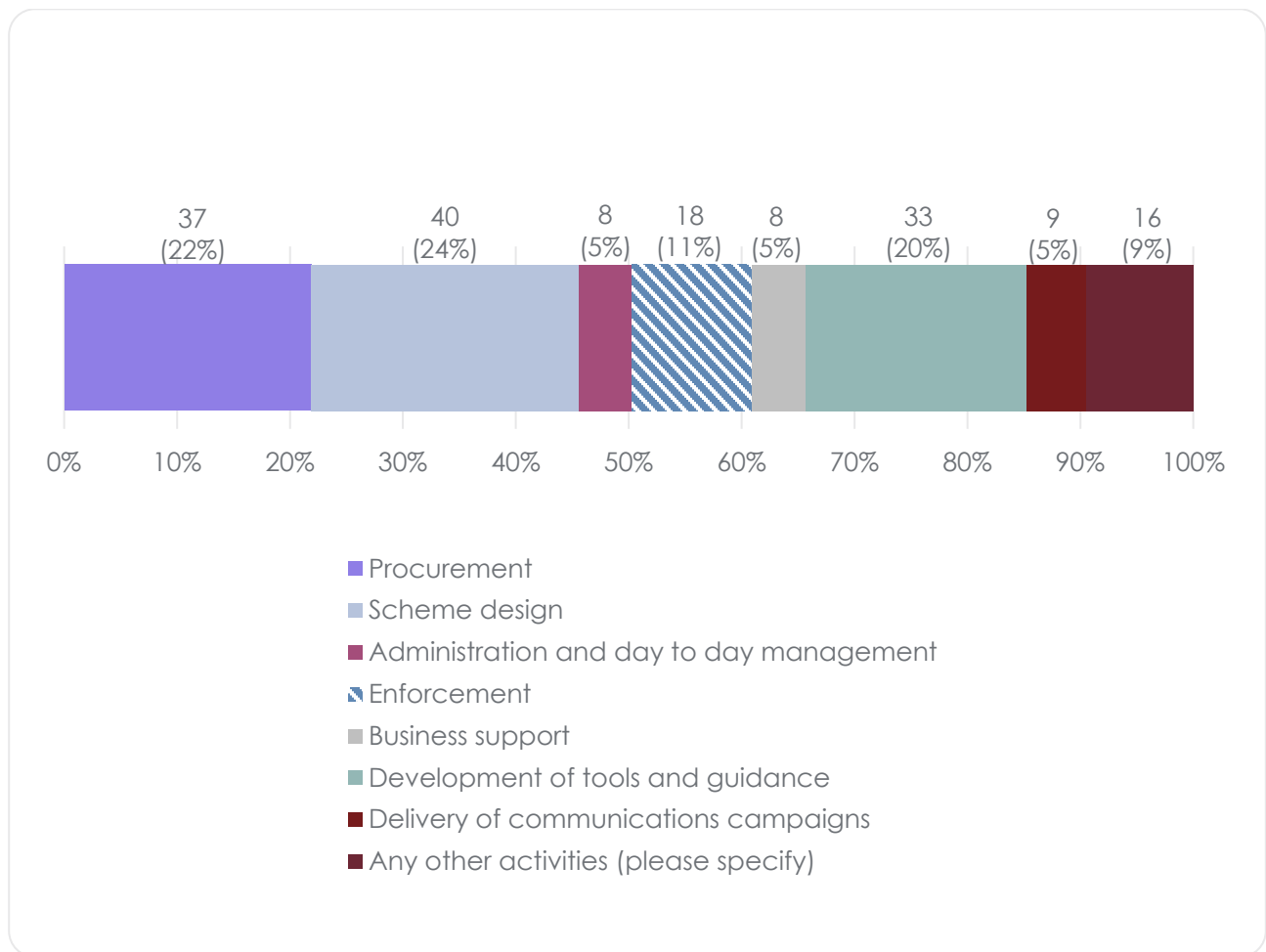


Figure 64 Question 57, (n=169)

Some respondents suggest that Defra should contribute to procurement, scheme design, business support, development of tools and guidance, and delivery of communications campaigns, without specifying further.

25.3.5. The Environment Agency

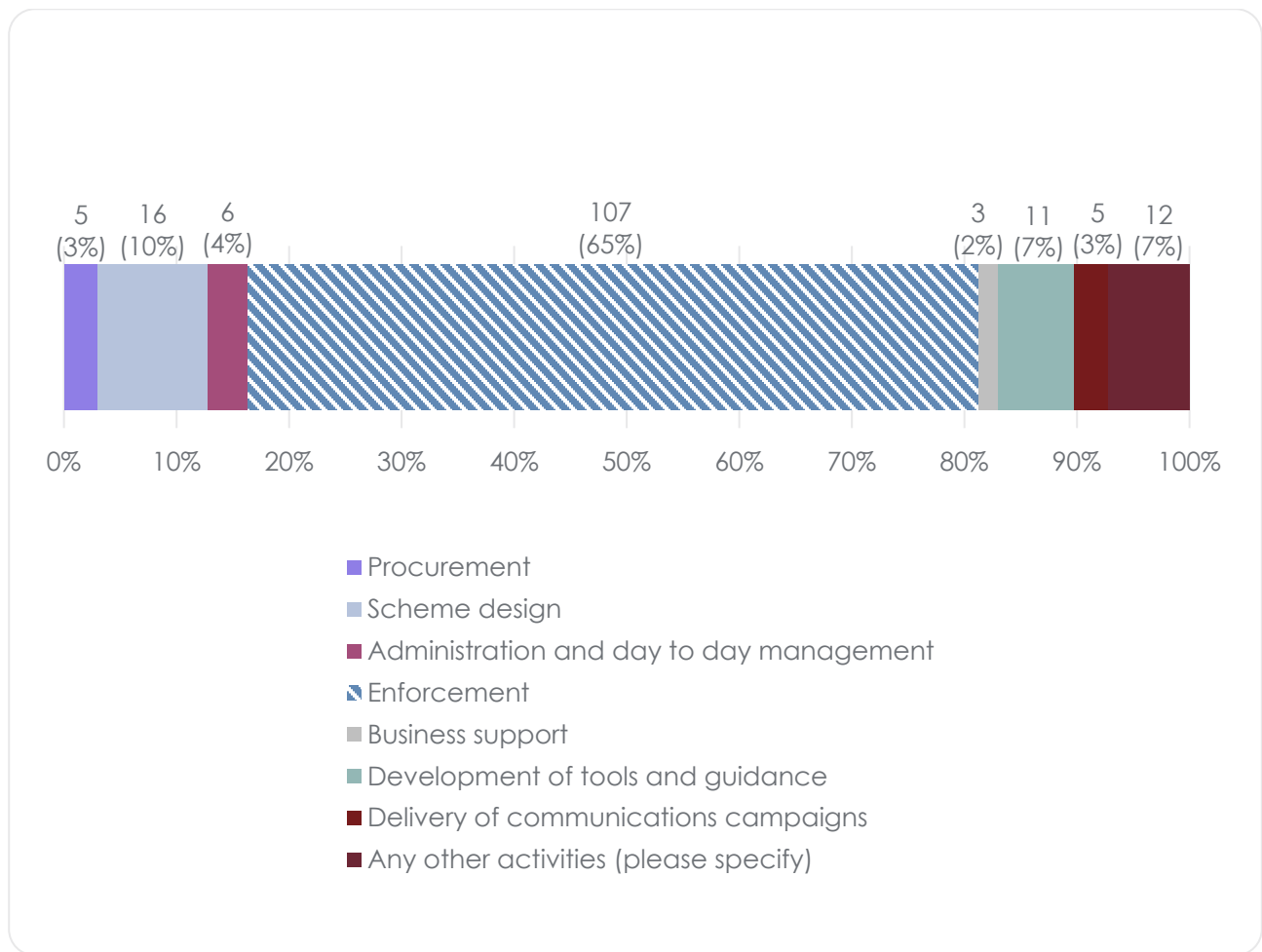


Figure 65 Question 57, (n=165)

Some respondents suggest that the Environment Agency should oversee enforcement of any zoning or franchising schemes. Respondents also suggest that the Environment Agency should contribute to procurement, scheme design, business support, development of tools and guidance, and delivery of communications campaigns, without specifying further.

A few respondents suggest that the Environment Agency should have a regulatory role in the procurement process, specifically when a complainant seeks recourse short of full legal redress in line with public sector procurement regulations. They suggest that the individual procurements should be conducted by local authorities in line with the agreed scheme design, Defra guidance, public sector procurement legislation, and any further guidance/statutory instruments issued by Government.

25.3.6. WRAP (Waste and Resources Action Programme)

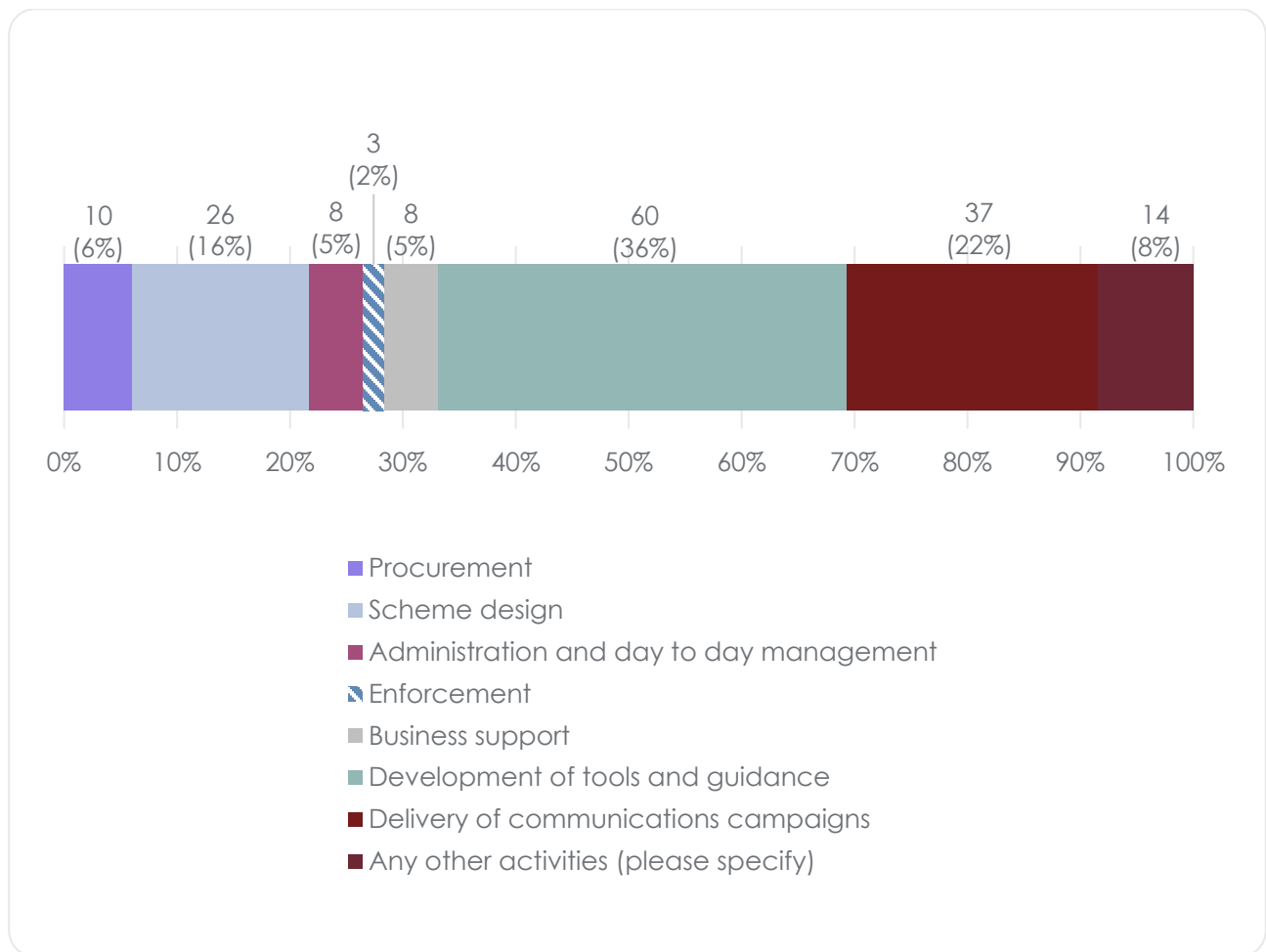


Figure 66 Question 57, (n=166)

Many respondents suggest that WRAP should contribute to scheme design, business support, development of tools and guidance, delivery communications campaigns, and data design.

25.3.7. Local authorities

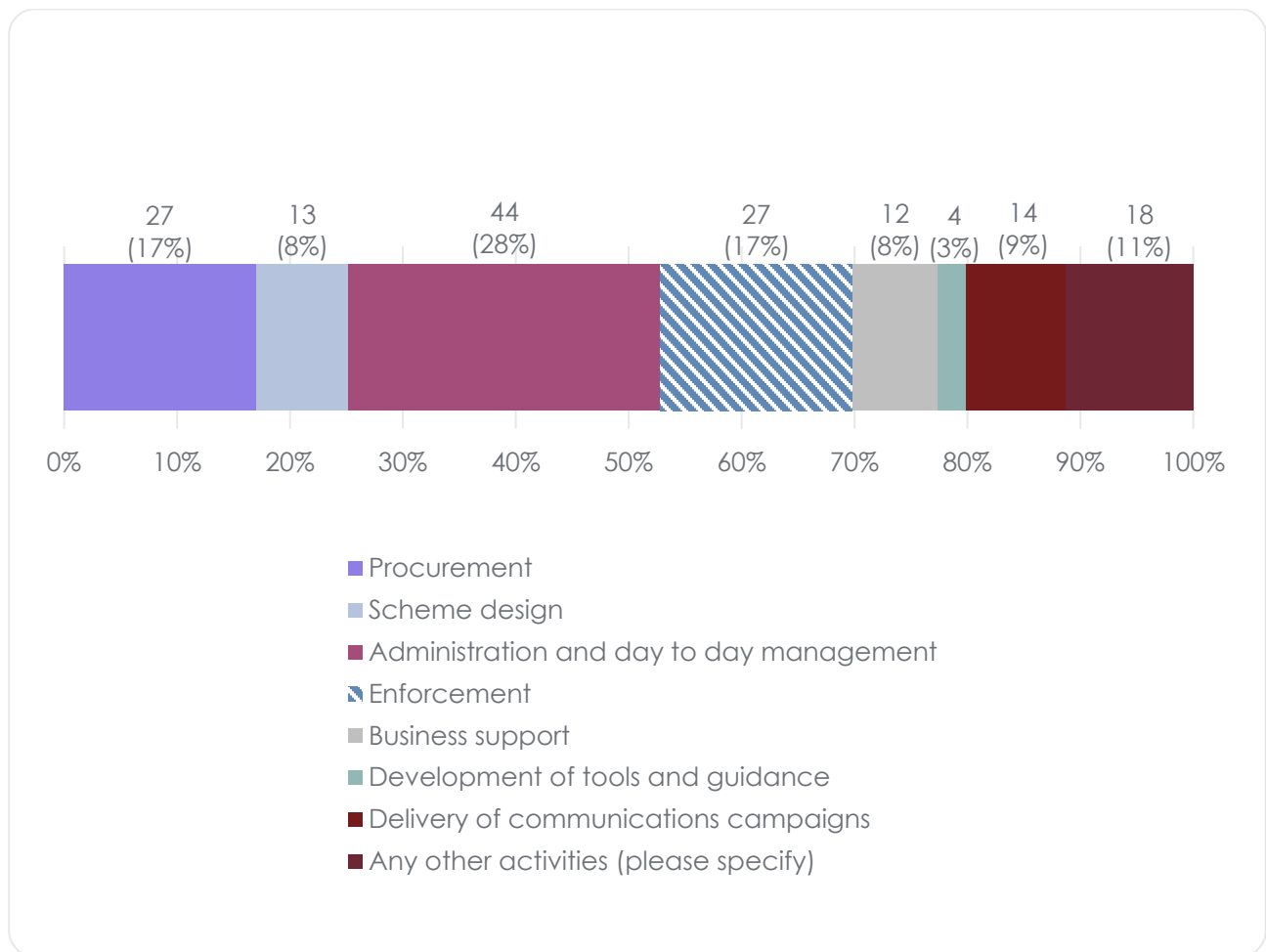


Figure 67 Question 57, (n=159)

Many respondents express concerns about the potential effects of conflicts of interest that may arise if local authorities operate commercial waste services alongside either a zoning or franchising scheme. They suggest that local authority involvement in schemes should not preclude them from bidding for trade contracts or give their bidding team an unfair advantage. Respondents suggest that guidance and an assessment process for these scenarios should be available.

Some respondents suggest that local authorities should contribute to procurement, scheme design, administration and day to day management, enforcement, business support, development of tools and guidance, and delivery of communications campaigns.

Some respondents believe that any stakeholder responsible for implementing zoning or franchising schemes should be representative of the relevant area and should be held publicly accountable. Respondents believe that local authorities and Business Improvement Districts meet these criteria and should therefore be responsible for implementing such schemes, though they do not specify how the public could hold these stakeholders accountable.

A few respondents suggest that local authorities should be able to make the final decision

about which zoning, or franchising model is best suited to their local area.

A few respondents suggest that local authorities should receive new burden funding for any new responsibilities they gain as part of zoning or franchising schemes.

A few respondents suggest that local authorities should be required to consult private sector waste collectors and waste producers about scheme design.

25.3.8. Business Improvement Districts (BIDs)

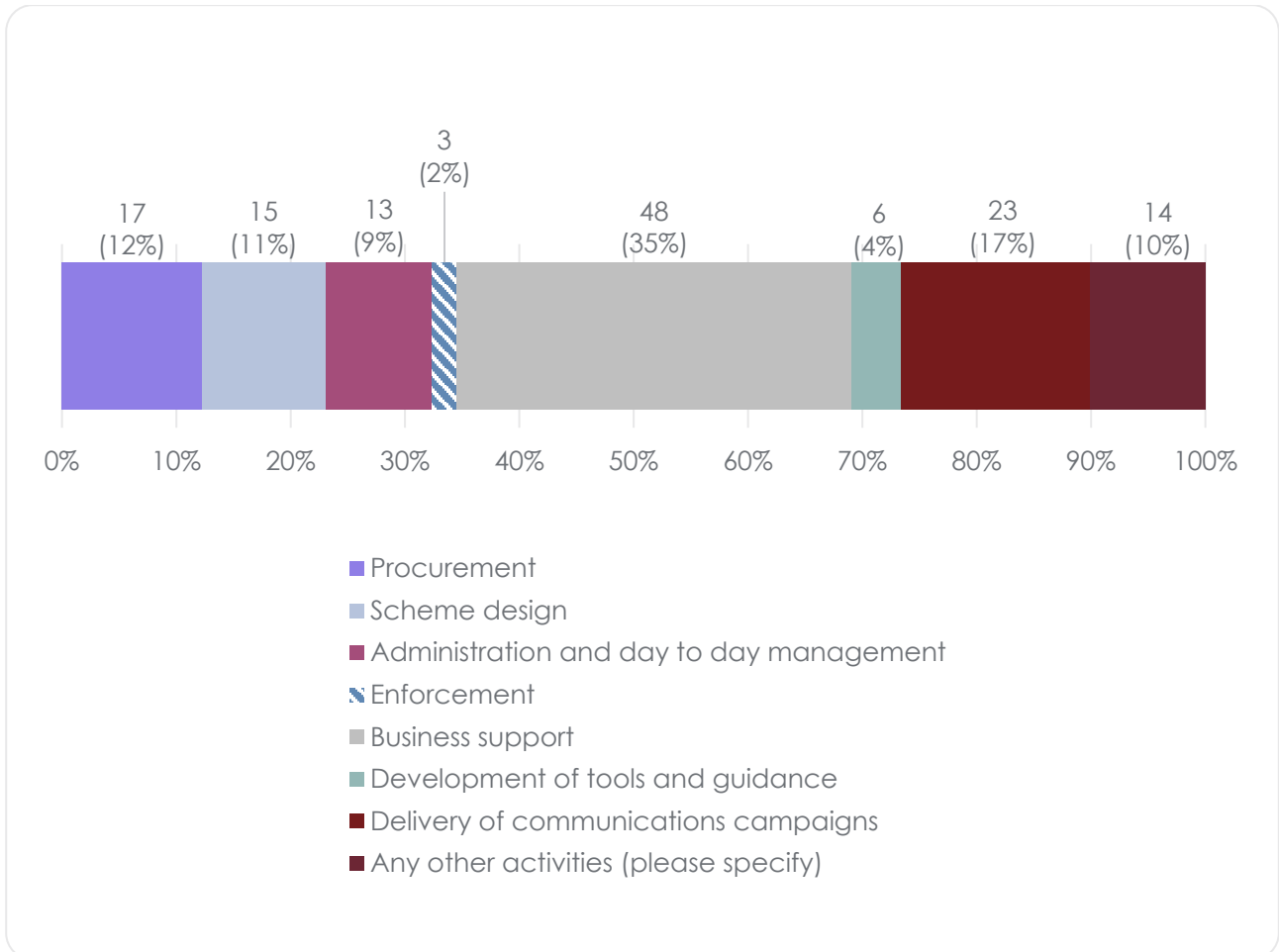


Figure 68 Question 57, (n=139)

Some respondents suggest that Business Improvement Districts should contribute to procurement, scheme design, administration and day to day management, business support, and delivery of communications campaigns, without specifying further.

25.3.9. Businesses and other organisations

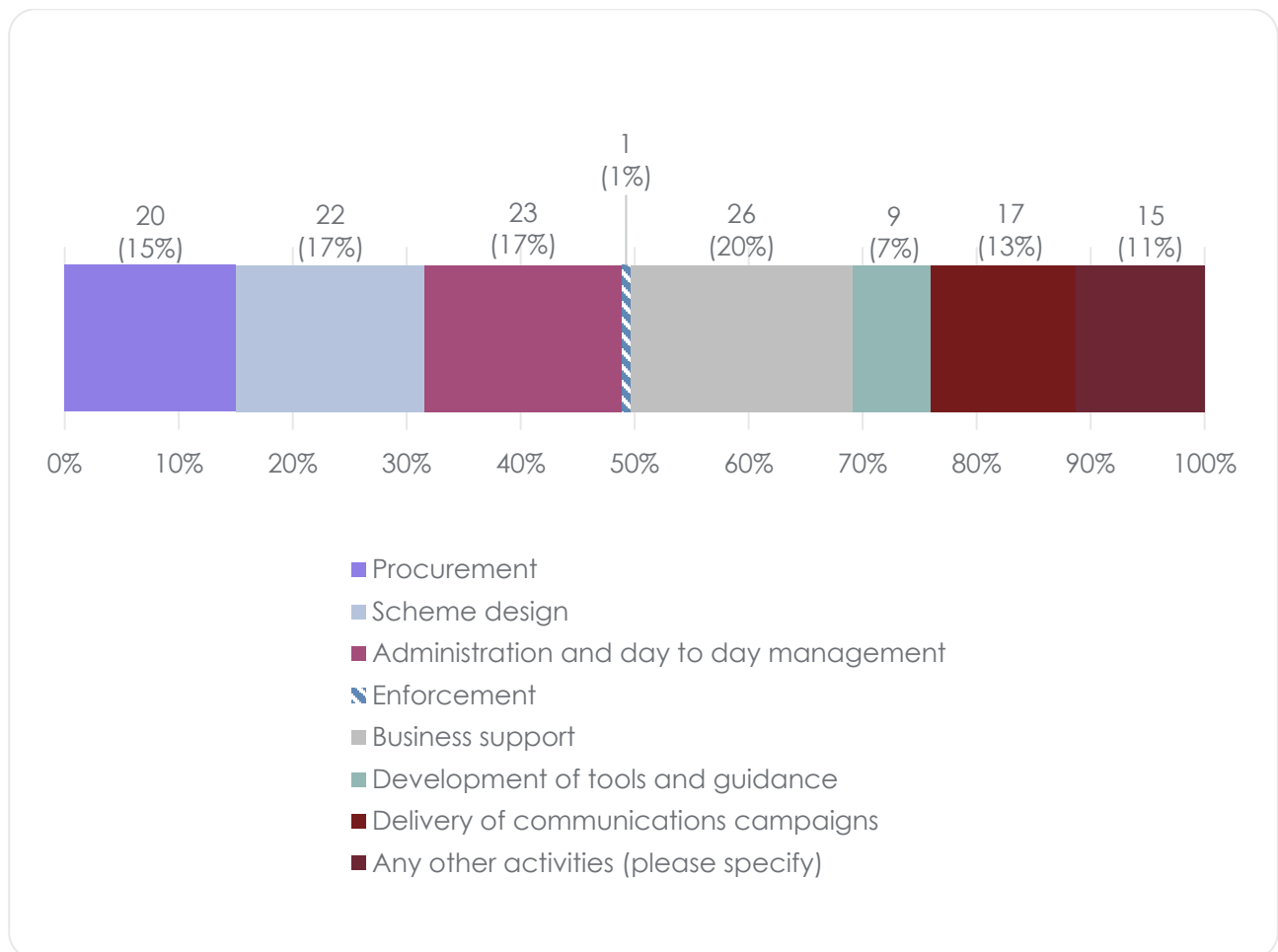


Figure 69 Question 57, (n=133)

Some respondents suggest that businesses, and specifically producers obligated under Extended Producer Responsibility, should contribute to scheme design and administration and day to day management, without providing more detail.

Some respondents suggest that businesses that are paying for packaging collections through Extended Producer Responsibility payments should play 'full roles' in all proposals within the Consistency in Household and Business Recycling consultation, without specifying what they mean by 'full roles.'

A few respondents suggest that businesses should be given a degree of control and flexibility over any zoning or franchising schemes and should be free to choose alternatives. Respondents suggest that such arrangements should be driven by businesses instead of the public sector.

A few respondents suggest that producers of waste should be obligated to provide information to support TEEP assessments.

25.3.10. Chambers of commerce

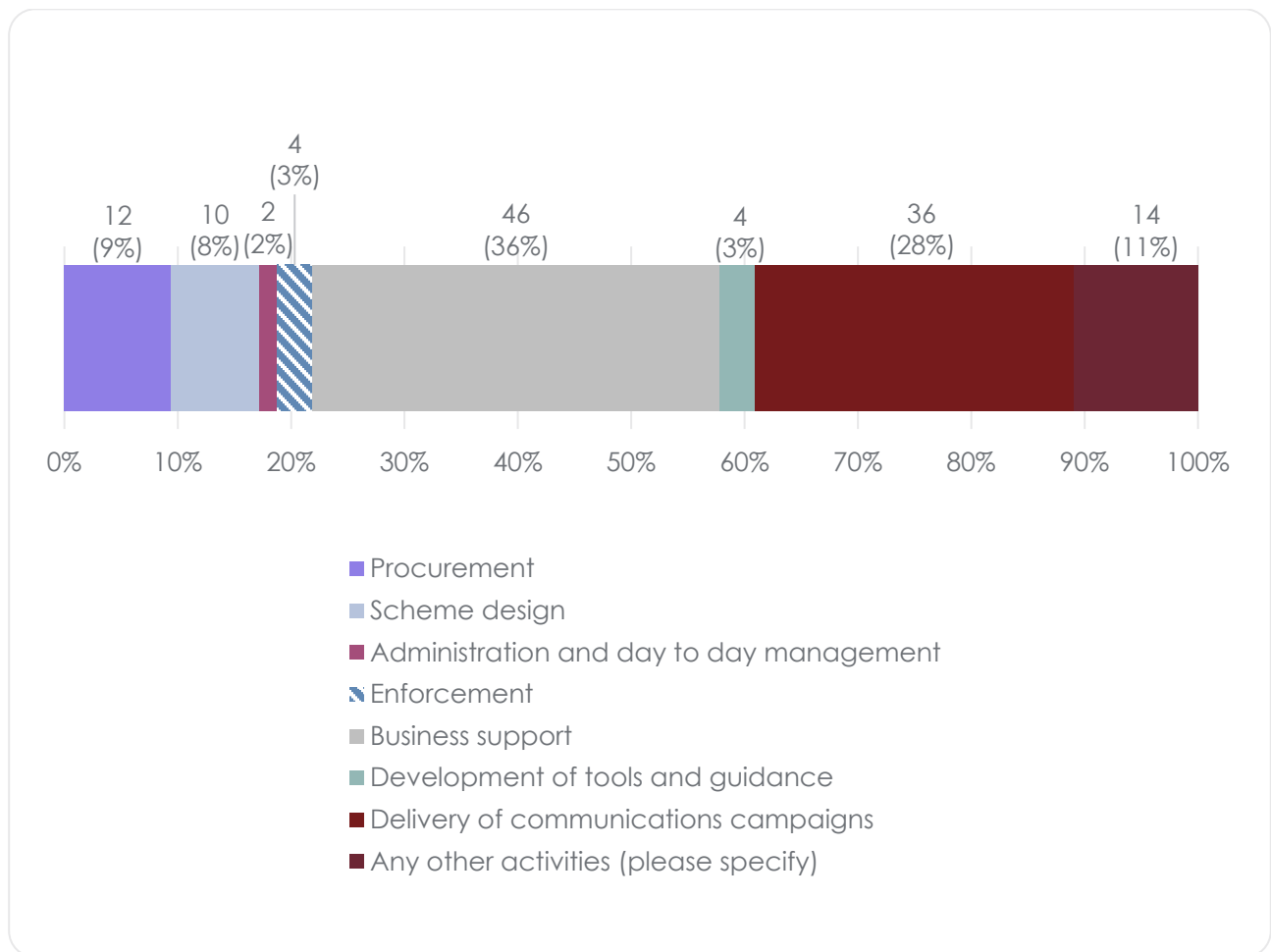


Figure 70 Question 57, (n=128)

Some respondents suggest that Chambers of Commerce should contribute to business support and delivery of communications campaigns, without specifying further.

25.3.11. Other stakeholders

EPR Scheme Administrator

Some respondents suggest that the Extended Producer Responsibility Scheme Administrator and Deposit Management Organisation should be consulted about the proposals. Respondents specify that the Scheme Administrator should play an ongoing strategic and delivery role in all Consistency in Household and Business Recycling proposals for household and non-household packaging. Respondents believe that the Scheme Administrator may have an important role to play in ensuring all relevant sectors work together to deliver the proposals. They suggest that the Scheme Administrator should be given statutory powers or duties wherever doing so can add value, help manage value chain conflicts, and enable Government to deliver policies in a speedy and cost-efficient manner.

Some respondents suggest roles for different stakeholder in their relationship with the Extended Producer Responsibility scheme administrator:

- service providers: enforcement and administration and day to day management;
- local partnerships: scheme design and development of tools and guidance;

- contractors: administration and day to day management;
- federation of Small Businesses: business support;
- Waste Infrastructure Delivery Programme: procurement;
- school and universities: communications campaigns;
- highway and planning authorities: support with bin storage arrangements;
- social enterprises: delivery of collection services;
- devolved administrations and their enforcement agencies;
- parish councils;
- waste collection services;
- providers of existing communications campaigns, such as the RECOUP Pledge2Recycle Plastics initiative; and
- packaging value chain, including industry associations.

Other organisations

Many respondents suggest several other stakeholders that could contribute to zoning or franchising schemes, which are listed below. Where respondents have indicated that a stakeholder should contribute to a particular activity, this had also been indicated. Respondents who suggested a specific activity for a specific stakeholder did not provide any further detail.

All/multiple stakeholders

Some respondents suggest that all, or multiple, stakeholders listed in the consultation may need to collaborate to implement zoning or franchising schemes. Some respondents specify that they believe that all stakeholders may be able to add value to the proposals.

A few respondents specify that all stakeholders should collaborate on the delivery of communications campaigns, without providing more detail.

A few respondents suggest that stakeholders should be involved in enforcement, business support, development of tools and guidance, and delivery of communications campaigns, without specifying further.

Concerns

Some respondents express concerns that the online version of the consultation form did not allow them to select more than one role per organisation.

Some respondents express concerns that franchising or zoning may discourage free trade, competitive pricing, and innovation, encourage monopolies and price fixing, limit freedom of choice, and deliver worse environmental outcomes. They oppose franchising and zoning for these reasons. As an alternative, some respondents suggest that local businesses should jointly procure waste services.

Some respondents express concerns about a perceived lack of detail in the proposals regarding the following: franchising and zoning schemes generally; the specific responsibilities associated with each listed activity; and whether there will be a preferred type of zoning or franchising scheme.

Some respondents express concerns that their responses to the question may vary depending on the type of zoning or franchising scheme in question. They note that the

consultation provides different examples of zoning and franchising schemes and believe that different stakeholders may be involved to varying degrees depending on the type of scheme. For example, in the co-collection model, they believe that local authorities may play a more central role than in other models.

A few respondents express concerns that too many participants may complicate scheme management and suggest keeping schemes as simple as possible for the time being.

A few respondents express concerns that public bodies and local authorities may be too bureaucratic and inefficient to deliver zoning or franchising schemes. Other respondents are concerned about legislative restrictions on procurement and competition, without specifying further.

A few respondents state that they do not have any views on the roles of stakeholders in implementing zoning or franchising schemes.

A few respondents express concerns that it may be difficult to fairly divide areas for waste collectors, as business size and tonnages may vary across areas.

A few respondents express concerns that zoning or franchising schemes may require a high level of administration costs or create contract disputes.

25.4. Question 58

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

This question was answered by 379 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Prioritise local solutions	9%	0%	27%	0%	0%	14%
Suggestions Duty on waste producers	8%	0%	28%	0%	0%	3%
Suggestions Accountability of contractors / obligation on waste collectors	8%	0%	24%	0%	0%	3%

Suggestions Further consultation required	6%	2%	10%	0%	13%	8%
Concerns Oppose zoning and franchising	5%	0%	10%	2%	0%	31%

Support

Some respondents express general support for the implementation of a waste collection franchising or zoning scheme and note that commercial waste collection works best through the provision of a standardised service with a wide customer base within one locality. Respondents suggest that zoning could address 'bin clutter' issues in towns and cities, increase efficiency and effectiveness of business waste collections, and have carbon benefits due to reduced numbers of vehicles on the roads.

A few respondents express support for the implementation of a waste collection franchising or zoning scheme, and state that a single provider model for waste is needed for environmental reasons, regulatory simplicity, and to ensure collectors offer a fair and comprehensive service.

Concerns

Many respondents express general concerns and opposition to a waste collection franchising or zoning scheme, and state that they feel that such schemes are based on flawed assumptions or have negative outcomes. Respondents express concerns that franchising or zoning schemes can undermine innovation, increase costs, or have the potential to produce unaccountable monopolies.

Some respondents express concerns that waste collection franchising or zoning scheme are anti-competitive. Respondents express concerns that a lack of competition will result in low quality recyclables and mediocre services, as contractors are not required to look for ways to add value in order to remain competitive.

Some respondents express concerns about the financial implications of implementing a waste collection franchising or zoning scheme, specifically:

- whether a franchising scheme will increase in price over time;
- whether a zoning scheme will result in contractors passing costs that they currently absorb onto customers;
- loss of waste service income for local authorities.

Some respondents express concerns that there may not be the capacity or infrastructure to implement a waste collection franchising or zoning scheme. Respondents express specific concerns about rural areas and large urban cities and highlight the large disparities in fleet sizes and varying capacities of transfer sites, depots, and material recovery facilities.

Some respondents express concerns with a waste collection franchising scheme. Respondents state that there is no legislative framework that allows local authorities to franchise commercial waste, and that even if there was, it is overly simplistic to assume that local or small waste management companies would make bids for franchise contracts.

Many respondents express a general concern about the proposal being underdeveloped and specify a perceived lack of detail in the proposal, in relation to the following:

- lack of stakeholder engagement;
- the legislative framework for developing zones;
- how zoning would work alongside national contracts if local authorities bid to run collections; and
- whether loss of income or investment requirements meet new burdens funding criteria.

A few respondents express concerns and opposition to the use of a waste collection franchising or zoning scheme as a 'one size fits all' approach to waste management. Respondents feel that standardised approaches may lack the flexibility required for services to businesses across different sectors, and express concerns about how large waste producers will be able to manage their waste through national contracts.

Suggestions

Many respondents suggest that a waste collection franchising or zoning scheme should make use of available local capacity through municipal infrastructure, before using long distance solutions. Respondents suggest that this should be set out in the procurement process, so that local, more sustainable, solutions are prioritised.

Many respondents suggest that a duty of care requirement should be placed upon waste producers to use a waste collector from their own zone.

Many respondents suggest that there should be an obligation on waste collectors to provide a waste collection service for all producers within their zone, and that local authorities should be removed from their obligations under the Environmental Protection Act (1990). Respondents suggest that if a contractor is not 100% compliant, they should be excluded from the franchising scheme.

Some respondents suggest that local authorities should be left to decide, control, and arrange waste collection franchising or zoning schemes. Respondents suggest that local authorities are best placed to judge environmental and social benefits to their communities, and how to work flexibly with partner authorities. Respondents also state however that local authorities will need support in acquiring data to ensure that they are able to make informed decisions.

Some respondents suggest that waste collections from small and micro businesses should be incorporated into household waste collections.

Some respondents suggest that a waste collection franchising or zoning scheme should be based on outcomes and performance metrics such as: greenhouse gas reductions, cost efficiency, improving air quality, and high recycling performance.

Some respondents suggest that a catalogue of licenced and approved waste collection service providers should be created for each zone, allowing businesses to choose a provider who offers the best value for money service.

Some respondents suggest that any approach to waste collection should be based on a whole supply chain approach, learning lessons from Waste Management Organisations and businesses already operating within these areas.

A few respondents suggest that stricter obligations on waste management arrangements should be implemented. Respondents suggest using building control regulations or planning permissions, while other respondents suggest that there should be central management of contracts by Defra.

A few respondents suggest that a waste collection franchising or zone scheme could offer the potential for collaborative procurement. Respondents suggest that neighbours and small or specialised businesses could share containers and collection facilities for homogenous waste streams within their zones.

A few respondents suggest that a co-collection service should operate, whereby the contractor providing household services should also provide non-household municipal premises services. Some respondents state that they already operate a co-collection service.

A few respondents suggest that waste collection franchising or zoning schemes should be integrated with the deposit return scheme and Extended Producer Responsibility obligations.

A few respondents suggest that a waste collection scheme should make use of all industry operators, irrespective of size, who have specific sectoral expertise on materials. Respondents state that the role of each aspect of industry is vital in the delivery of material to evidence points.

25.5. Question 59

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

This question was answered by 386 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Legislation (general)	9%	1%	27%	2%	0%	6%
Suggestions Provide resources, guidelines, and information	7%	2%	16%	2%	13%	6%
Suggestions Specific stakeholders	6%	1%	17%	2%	3%	6%
Suggestions Encourage current schemes	4%	4%	0%	14%	3%	17%
Suggestions Include micro-businesses in household collections	4%	2%	1%	16%	16%	3%

Suggestions

Many respondents suggest that non-household municipal waste producers will not commit to collaborative procurement unless there is a statutory or legal requirement in place. Some respondents suggest that participation in local franchising / zoning arrangements for non-household municipals premises should be made default.

Many respondents suggest that educational support for non-household municipal waste producers, on requirements for waste collection and environmental benefits, should be provided to encourage collaborative procurement. Some respondents suggest a toolkit of information and data should be created. Other respondents suggest that a platform/website should be created, where local businesses can come together and arrange collaborative procurement.

Many respondents suggest that collaboration with stakeholders will be essential to supporting non-household municipal waste producers to procure waste management

services collaboratively. Some respondents suggest specific stakeholders such as Business Improvement Districts, Chamber of Commerce, Local Enterprise Partnerships, WRAP, local authorities, Trade Associations, and LARAC.

Many respondents suggest that Government should support current schemes which aim to increase the collection of packaging items, like paper cups. Some respondents state that progress also depends on the Extended Producer Responsibility consultation's mandatory cup return scheme.

A few respondents suggest various measures that could be used to ensure prices for waste management services are reasonable. For example, price capping waste management services, merging waste management into business rates, or offering discounted rates for collaborative procurement.

A few respondents suggest that all business should receive high quality waste collection services and value for money.

Some respondents suggest that rather than supporting non-household municipal waste producers to procure waste management collaboratively, there should be exemptions to allow for co-mingled collection, for example for those with space constraints.

Some respondents suggest that micro-firms should have their waste collections incorporated into household collections. Some respondents suggest that utilising these resources would enable synergies from optimised routing or could reduce financial and administrative burdens.

Concerns

A few respondents express general concern and opposition to providing support for non-household municipal waste producers to procure waste management services collaboratively. For example, some respondents state that not all waste producers create the same waste type or volume, and that a lack of accountability could result in tension between businesses.

Some respondents express varied concerns about potential issues that may arise from non-household municipal waste producers using waste management services through collaborative procurement. For example, respondents suggest that there may be cash flow difficulties, zoning bias, and difficulties breaking contracts. Some respondents express concerns with specific types of non-household municipal waste producers, for example embassies and short term lets such as 'Airbnb', that claim that they produce household, rather than commercial waste.

25.6. Question 60

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

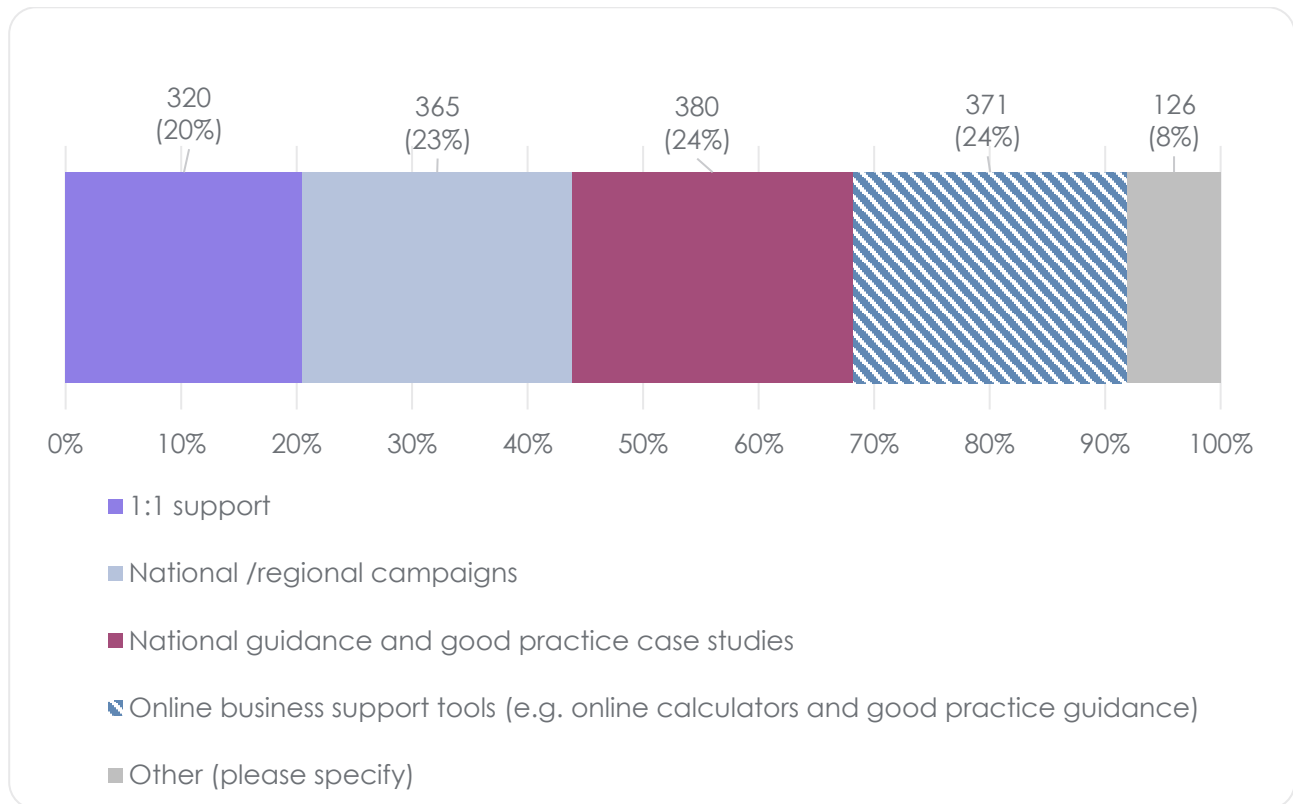


Figure 71 Question 60, (n=440)

25.6.2. Comments

This section summarises comments from respondents in response to the option "Other (please specify)". 195 respondents made comments in response to this question. Their comments are summarised below.

Support

Many respondents express general support for all of the proposed measures of business support.

A few respondents express support for the proposed measure of providing 1:1 support for businesses. Respondents suggest that this form of support may help to engage with 'hard to reach' businesses. Respondents suggest that local authorities would be best placed to provide this type of support.

A few respondents express support for the proposed measure of providing national and/or regional campaigns to businesses. Respondents suggest however that while regional campaigns might not have much value, a well-designed campaign will be important for raising the profile of changes, particularly when disseminated through local authority communication channels.

A few respondents express support for the proposed measure of providing national

guidance and good practice case studies to businesses, with the caveat that guidance needs to be user friendly. Respondents further suggest that good practice case studies should be practical and easy to replicate across a range of circumstances.

A few respondents express support for the proposed measure of providing online business support tools, like online calculators and good practice guidance. Respondents suggest that such tools will be useful for businesses to assist with container sizing and explaining what materials are in the scope of each waste stream.

Concerns

Some respondents express general concerns about a perceived lack of detail in the proposal in relation to the following:

- who would be responsible for the oversight and provision of business support measures;
- what each business support measure might involve;
- how each business support measure will be assessed for effectiveness; and
- how business support measures will be funded.

A few respondents express varied concerns about the relationship between business support measures and Extended Producer Responsibility. For example, respondents question whether local authorities would have access to Extended Producer Responsibility or new burdens funding to deliver business support measures. Other respondents state that it would not be appropriate for Extended Producer Responsibility funds to be used in this way, or state that these may become open ended costs for the Extended Producer Responsibility system.

Suggestions

Many respondents suggest that other types of business support could include:

- provision of extra resources, including funding, to local authorities so that they can better support businesses;
- provision of information on how to improve overall resource efficiency and sustainability, and how to begin to move towards net zero carbon;
- provision of practical test sites and training for businesses to learn how to reduce and recycle waste;
- creation of incentives to encourage compliance;
- provision of training and support to enable businesses to undertake environmental audits;
- provision of specialist business advisors;
- training and support on how to report carbon savings to customers and other stakeholders; and
- provision of examples outside of the UK to inspire new approaches to recycling and waste reduction.

Some respondents suggest that the Extended Producer Responsibility Scheme Administrator should be responsible for the oversight of business support measures, to ensure that cost-efficiency and performance outcomes are achieved.

Some respondents suggest that Government should encourage waste management

companies to offer business support.

Some respondents suggest that other types of business support could also include creating an online portal or framework, where businesses can come together to collaboratively procure waste collection services. Respondents suggest that this could be a website, an app, online forum, or an impartial online platform or website which encourages sustainable practices.

Some respondents also suggest that other types of business support could include price capping, to ensure reasonableness, and granting exemptions for those with space constraints.

A few respondents offer varied suggestions of different stakeholders who could provide 1:1 business support, for example: WRAP, Chamber of Commerce, local authorities, and trade associations.

25.7. Question 61

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

This question was answered by 405 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Barriers Space / location / capacity	23%	5%	56%	16%	6%	36%
Concerns Duty of care	10%	0%	33%	0%	0%	6%
Concerns Barriers Financial cost	9%	1%	28%	0%	0%	8%
Concerns Contamination and compliance	9%	4%	16%	22%	3%	8%
Concerns Staffing	9%	0%	29%	0%	0%	8%

Support

A few respondents express general support for the implementation of commercial waste bring sites. Some respondents state that commercial waste bring sites could be feasible

and effective for small and micro-firms.

A few respondents state that there are no barriers to setting up commercial waste bring sites.

Some respondents express support for the implementation of commercial waste bring sites as a useful way to manage non-household municipal waste. Respondents state that bring sites could be useful to those in the building trade, the self-employed, those with limited storage, and for those who pay clean-up costs for fly tipping. Other respondents suggest that bring sites make a higher degree of separation at source technically, and economically practicable.

Concerns

Many respondents express concerns that there may not be suitable locations or sufficient space to set up commercial bring sites. Respondents express concerns that space on existing HWRCs is limited, and state that it may be difficult to find locations for bring sites which meet capacity, distance, and accessibility requirements.

Many respondents express concerns about the financial costs of setting up commercial waste bring sites, and how to ensure those that use the sites are the ones paying for the service. Some respondents express concerns about new burdens funding, and other respondents state that Extended Producer Responsibility funds should not contribute to the harming of local neighbourhoods.

Many respondents express concern that commercial bring sites will need to be staffed to ensure that commercial waste is managed appropriately. Some respondents express concern about the impact this would have on resource levels.

Many respondents express concerns that setting up commercial bring sites may result in contamination of waste streams. Respondents express concerns on businesses ability to segregate their waste.

Many respondents express concerns about the behavioural issues which might arise from setting up communal facilities such as commercial bring sites. For example, respondents express concerns about theft, vandalism, littering, fly tipping and anti-social behaviour.

Many respondents express concerns about the duty of care requirements on commercial waste producers who make use of bring sites. Respondents state that the current duty of care system, and its enforcement, needs to be reviewed in light of the Consistency in Household and Business Recycling and Extended Producer Responsibility consultations.

Many respondents state that the impact of the Covid-19 pandemic needs to be fully considered in any proposal for setting up commercial bring sites. Respondents state that while the pandemic reduced capacity at HWRCs, booking systems and other social distancing processes increased efficiency at other sites, and so may be adopted for long term use.

Many respondents express concerns about businesses ability to use commercial bring sites, due to their own working hours. Respondents state that bring sites would have to be open outside normal business hours, but that this could be restricted by licencing.

Many respondents express concerns about the regulatory requirements which may

prevent the setting up of commercial bring sites.

Some respondents express concerns that there may be inadequate infrastructure for setting up commercial waste bring sites. Respondents state that if existing Household Reuse and Recycling Centres (HWRCs) are to be used there will be a conflict between household and business use, or that weighbridges will need to be installed to accurately record waste volumes.

Some respondents express concerns that setting up commercial bring sites will place significant demands on local authorities. Respondents express concerns about how local authorities would manage and maintain sites, and the effect this will have on overall recycling rates.

Some respondents express concerns about businesses ability to transport waste to commercial bring sites, and state that the requirement to hold a waste carriers licence could be a barrier.

Some respondents express concerns about a perceived lack of detail in the proposal in relation to the following: whether the consultation refers to bring sites that local authorities already operate, issues businesses would have in transporting waste to bring sites, guidance on the nature of sites, how they will be used, and who will be responsible for operating them.

A few respondents express concerns that there may be local opposition to setting up commercial waste bring sites. Respondents state that neighbourhood pride may be affected, and that bring sites are a source of concern for local residents.

A few respondents express concerns that commercial bring sites would not be appropriate for food waste streams.

Suggestions

Some respondents suggest that a waste collection service should be provided for commercial businesses.

Some respondents suggest that HWRC sites and existing infrastructure should be available for commercial businesses to use to dispose of their waste. Some respondents suggest that businesses should be able to access these sites for a charge.

Some respondents suggest varied legislation and enforcement measures that could be used to regulate commercial bring sites, for example: making local government an enforcement body, enhanced s47 powers contained in the London Local Authority Act (2007), Automatic Number Plate Recognition technology, and enhanced Waste Carrier Regulations.

A few respondents suggest that the introduction of commercial waste bring sites should happen alongside other proposals. For example, the deposit return scheme, or a franchising/ zoning scheme. A few respondents suggest that setting up commercial waste bring sites should be in the context of Option 4 considered by the UK Plastics Pact that was facilitated by a sprint group.

A few respondents suggestions that ownership and management of commercial waste bring sites should be clear. Some respondents make specific suggestions about who

should regulate and run sites, for example local authorities or Waste Collection Authorities.

A few respondents offer varied suggestions about commercial waste bring sites. For example, respondents state that local authorities should provide funded business support, that technology at bring sites needs to be affordable, that hazardous waste streams should be included, that Government should fund research into smart bins for commercial bring sites, and that Government should fund research into the links between bring sites and fly tipping.

26. Proposal 23: Exemptions to the separate collection of two separate waste streams from non-household municipal premises

26.1. Question 62

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

26.1.2. Plastic and metal

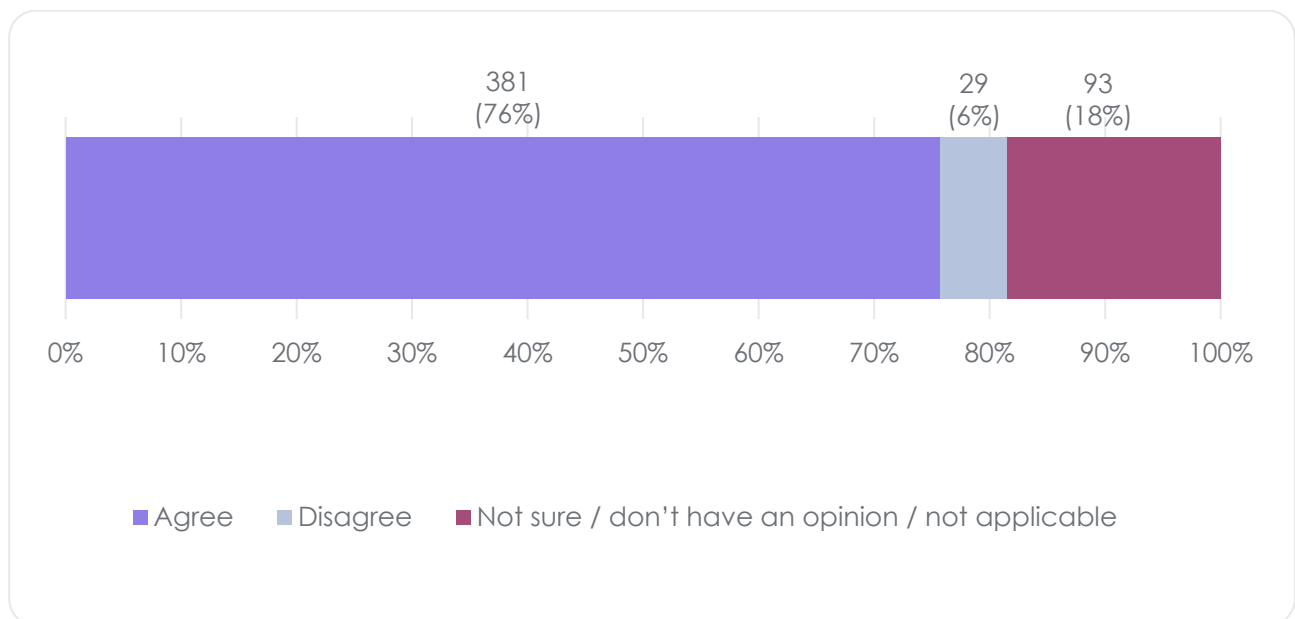


Figure 72 Question 62, (n=503)

26.1.3. Glass and metal

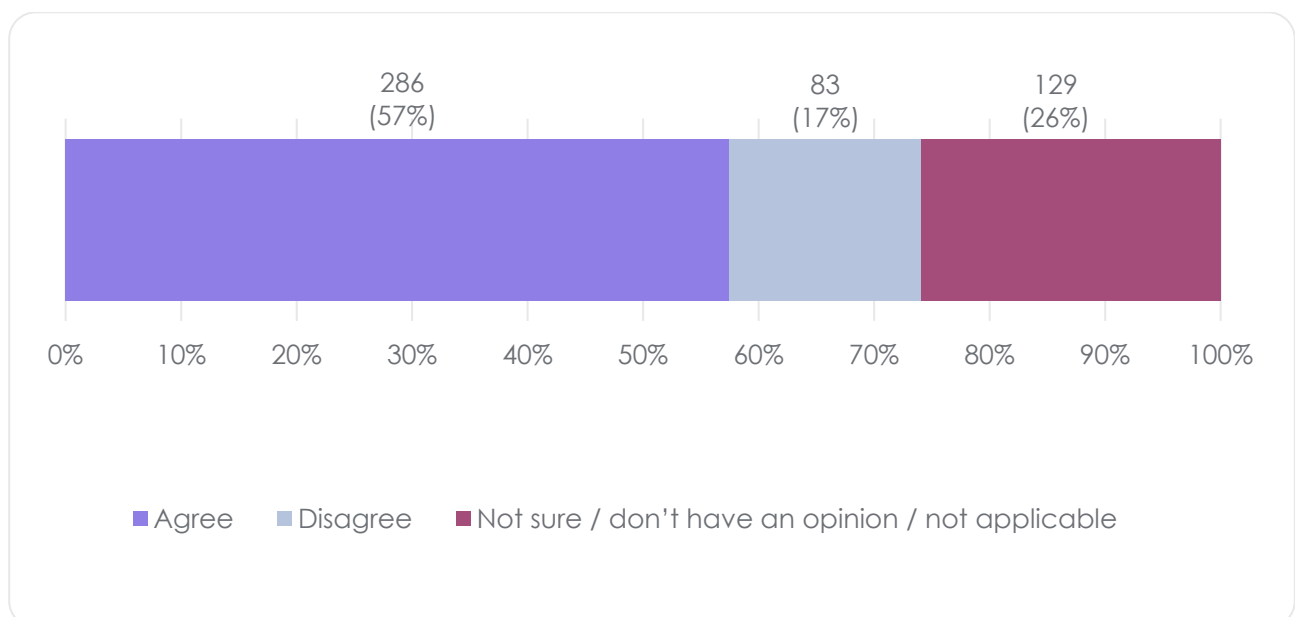


Figure 73 Question 62, (n=498)

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

This question was answered by 363 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Support Already done locally	8%	1%	24%	0%	3%	8%
Concerns Contamination	7%	0%	19%	14%	3%	6%
Support General	7%	5%	8%	10%	3%	11%
Suggestions Should be consistent with household collection	7%	4%	15%	6%	0%	3%
Support Sufficient infrastructure for sorting post-collection	6%	1%	11%	12%	10%	14%

Support

Many respondents express support for the proposal because they believe that many local authorities already operate co-mingled collection of various material combinations. The most common combination mentioned is plastic and metal, though a few respondents specify glass and metal.

Many respondents express support for co-mingled collection, with most specifying that glass, metal, and plastic should be collected together. Respondents believe that some materials recovery facilities are already able to sort co-mingled collection without reducing material quality, or that the presence of plastic in collections may cushion glass and prevent breakage.

Many respondents express support for the proposal because they believe that materials recovery facilities can easily separate metal from other materials, with some respondents specifying glass and others specifying plastic.

A few respondents support co-mingled collection because they believe that requiring fewer collections may reduce carbon emissions from collections vehicles.

Concerns

Many respondents express concerns about several types of contamination that could occur in co-mingled streams, including plastic films and metals contaminating cartons, and broken glass contaminating metals and plastics.

Many respondents express several concerns about collecting glass with other materials, including the potential noise levels of sorting glass from metal at the kerbside, and the potential damage glass may cause to sorting machinery. A few respondents also express health and safety concerns about collecting and processing glass. Some are concerned that mixing glass with other materials may increase breakage and risk harming staff, while others believe that a co-mingled stream is the safer option.

Some respondents express concerns about the potential complexities of collecting metal and plastic together, since they believe that businesses are paid for their metal waste on the one hand but must pay to have plastic waste collected on the other.

Some respondents express concerns about a perceived lack of clarity in the proposal and question whether Government plans to include plastic films in exemptions, and how the co-mingled collection of cartons and metal is expected to impact the quality of cartons.

A few respondents express concerns that segregating existing co-mingled waste streams may require new vehicle configurations and may make collections less efficient.

A few respondents express concerns that materials recovery facilities and waste treatment facilities may lack the capacity to deal with non-household waste or co-mingled waste streams. Some specify that materials recovery facilities may not be equipped to sort glass or plastic film from other materials.

A few respondents oppose mixing glass and metal because they believe there is little demand for mixed collections of this kind.

Suggestions

Many respondents suggest that further research may be needed before a decision on the proposals can be made. Other respondents think that methods of optimising material quality during sorting and reprocessing should be researched after Government has decided about exemptions.

Many respondents suggest that collections from household and non-household premises should be consistent. They believe that such consistency may be more practical for local authorities and may avoid confusing employees who also recycle at home.

Some respondents make suggestions relating to the deposit return scheme. Some respondents suggest collecting metal with glass because they believe that most drinks cans will be captured under the deposit return scheme and separate metal collections may therefore be unnecessary. Others suggest that a deposit return scheme for England, Wales and Northern Ireland should only be implemented after the success of Extended Produce Responsibility and Consistency in Household and Business Recycling reforms has been assessed.

Some respondents suggest that the Extended Produce Responsibility Scheme Administrator should be consulted about any exemptions, and therefore believe that a

decision about the proposal cannot be made until the Scheme Administrator is in place.

Some respondents suggest sorting collections at kerbside, which they believe is a cost-effective option that may maximise material quality and is already used by many local authorities.

A few respondents suggest collecting all materials separately. They believe that in co-mingled collection, one material may be dominant in terms of value and volume, so the sorting process may prioritise maintaining the quality of the dominant material at the expense of other materials.

A few respondents suggest that glass collections should remain separate to optimise glass quality and reduce contamination of other materials.

A few respondents suggest that the level of separation of materials should reflect the different volumes of materials that non-household premises produce.

26.2. Question 63

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

This question was answered by 396 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Consistent with household collections	10%	1%	24%	10%	3%	19%
Suggestions Collect materials together where infrastructure exists to sort it	9%	1%	27%	0%	3%	11%
Suggestions Glass, plastic, and metal together	7%	0%	25%	0%	0%	0%
Suggestions No other exemptions	7%	3%	5%	24%	16%	19%
Suggestions Exemptions Specific materials	7%	1%	18%	0%	3%	19%

Suggestions

Many respondents suggest that household and non-household waste should be co-collected as much as possible to help reduce costs for local authorities, avoid public confusion and ensure consistent communications.

Many respondents suggest that there should be no other exemptions other than those already mentioned in the proposal.

Many respondents make suggestions for specific materials that could be exempt from separate collection, with cartons, plastic film, paper, and card all being mentioned.

Many respondents suggest allowing glass, plastic, and metal to be collected together in a 'container' recycling stream without the need for a written assessment, with some specifying that plastic films and cartons should not be included in this stream.

Many respondents suggest that materials should be collected together if materials recovery facilities are able to sort them, as long as material quality is not compromised, and the materials recovery facility is supplying sustainable end markets.

Some respondents suggest that all dry recyclables should be collected together and believe that many top-performing local authorities currently operate co-mingled recycling collections.

Some respondents suggest that there should be no exemptions at all, because they believe that separate collection leads to better recycling outcomes. Some respondents specify that hazardous waste, fibre, food, and glass should always be collected separately.

Some respondents suggest that a decision on the proposal should be based on research among businesses and feedback from reprocessors and should not be made until the Extended Producer Responsibility Scheme Administrator is in place.

Some respondents suggest that the Extended Producer Responsibility Scheme Administrator should work across the whole packaging value chain to deliver the best environmental outcomes from recycling.

Some respondents suggest that local authorities should be able to decide their collection approach depending on the specific circumstances of their local area.

Some respondents suggest that exemptions should be considered in scenarios where storage space for additional recycling bins is an issue and sharing recycling bins with neighbouring businesses is not an option.

Some respondents suggest that the decision on exemptions should be based on which option can maximise participation and capture while minimising contamination. Other respondents suggest that factors such as the volume of waste, business type and the availability of infrastructure should be considered when assessing which materials are collected from non-household premises.

A few respondents suggest separately collecting the streams with the greatest volume of materials, such as paper and card or glass, and allowing the remaining materials to be

collected in a mixed stream.

A few respondents suggest allowing certified compostable packaging to be collected with food waste.

Concerns

A few respondents express concerns about health and safety, with some specifying that kerbside sorting systems may pose risks such as puncture wounds from glass or metal.

A few respondents express concerns about recycling infrastructure. For example, some believe that materials recovery facilities may lack sorting capability, while others think separate collection may require additional vehicles, staff, depot space and amendments to sorting and disposal facilities.

A few respondents express concerns that businesses and the public may not support separate collection due to potential space constraints and difficulties with implementation. Some respondents suggest that clear communications will be necessary to ensure participation.

A few respondents express concerns that the costs of collections may increase if additional collections are required, or that the costs of sorting will increase if more materials can be collected together.

27. Proposal 24: Conditions where an exemption may apply and two or more recyclable waste streams may be collected together from non-household municipal premises

27.1. Question 64

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

This question was answered by 409 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Account for local circumstances / allow local authorities to decide	8%	0%	20%	14%	13%	0%
Concerns Financial cost / funding	7%	0%	22%	0%	0%	3%
Suggestions Decide at franchise / zoning level	7%	0%	22%	0%	0%	0%
Support Definition comprehensive	6%	0%	19%	0%	0%	3%
Concerns Exemptions permit inaction / oppose widespread exemptions	5%	4%	0%	18%	6%	14%

Support

Many respondents express support for the definition of 'technically practicable' because they believe the list of proposed circumstances is extensive.

Some respondents express general support for the definition of 'technically practicable' as defined in the proposal.

Some respondents express support for the proposed definition of 'technically practicable' but suggest there should be scope to expand the list of proposed examples. Some respondents also suggest that 'technically practicable' should be considered equally alongside 'economically practicable'.

Concerns

Concerns with the definition

Some respondents express concerns that the definition lacks details and suggest further clarity in certain places is required. For example: definition of 'in practice' needs quantifying and definition of 'technically developed' needs to be provided. Many respondents express general concerns about ambiguity that can occur as result of individual interpretation of definitions.

Many respondents express concerns that introducing the proposed definition of 'technically practicable' could add unnecessary complexities and impose costs on businesses.

General concerns

Many respondents express concerns for any part of the packaging value chain being offered opportunities to exempt themselves from delivering wider Government environmental objectives. Respondents express concerns that where businesses are paying net costs of waste management giving local authorities opportunity for exemptions would be unacceptable.

Some respondents express general concerns for the use of TEEP as a whole because respondents believe it could be used by local authorities to undermine wider Government goals rather than delivering environmental benefits.

Some respondents express concerns for the impact of multiple containers on streets where safe access to footpaths should be maintained.

A few respondents express general concerns that businesses may not have been consulted in regard to any changes that could affect them.

Suggestions

Suggestions relating to the definition

- A few respondents suggest that the primary outcome of any decisions on whether separate collection is 'technically practicable' should be achieving wider Government environmental goals.
- A few respondents suggest the proposed definition of 'technically practicable' for non-household municipal premises should align with the corresponding definition for household waste.
- Some respondents suggest that the impact of compliance by business employees should be considered under the proposed definition of 'technically practicable'.
- A few respondents suggest that the definition of 'technically practicable' should not be qualified with the term 'economic' because this could create confusion in the difference between 'technically practicable' and 'economically practicable'.

- Some respondents suggest that general health and safety implications of manual handling should be considered under the proposed definition of 'technically practicable'.
- Some respondents suggest that the general impact of Extended Producer Responsibility and deposit return scheme should be considered under the proposed definition of 'technically practicable'.
- Many respondents suggest the existing capacity of infrastructure should be considered under the proposed definition of 'technically practicable'. Respondents state that depot and transfer stations may not currently have the space to accommodate the multiple containers necessary for source separated collections.
- A few respondents suggest that the general practicalities of collecting and emptying multiple containers should be considered under the proposed definition of 'technically practicable'.
- A few respondents suggest that geographical limits should be considered under the proposed definition of 'technically practicable'. For example, in rural areas where sending multiple vehicles long distances for small volumes of waste or in city centres where accessibility to non-household municipals could be difficult.
- Some respondents suggest generally that the capacity of vehicles to accommodate source separated collections should be considered under the proposed definition of 'technically practicable'.
- A few respondents suggest that the proposed exemptions under the definition of 'technically practicable' should also apply to separate weekly food collections.

Other suggestions – who defines 'technically practicable'

Many respondents suggest the proposed definition of 'technically practicable' should consider local circumstances and therefore local authorities should be allowed to decide what is 'technically practicable' as they are best placed to judge.

Many respondents suggest that issues of 'technically practicable' should be considered at the franchise/zoning level in a holistic approach for all businesses. Respondents suggest this could allow for a more equitable and fair service level across all local communities.

Other suggestions – focus on overcoming challenges

A few respondents suggest that industries with expertise in design and recycling should be consulted by Government to help overcome any obstacles faced by the proposed collections.

A few respondents suggest that investments in technology and infrastructure should be made to improve the 'technically practicable' nature of source separated collections if it is believed that a separated collection system could provide higher quality recyclate.

Many respondents suggest generally that solutions to any obstacles of source separated collections should be found rather than providing opportunities for exemptions under the proposed definition of 'technically practicable'.

Other suggestions – output quality and end markets

Many respondents suggest that mixed collections should be allowed to continue where

materials recovery facilities are shown to be supplying sustainable end markets.

A few respondents suggest generally that any collection system should be focused on maximising capture rates of the highest quality recyclate possible.

A few respondents express concerns that no loopholes relating to the mixed collection of plastics films/flexibles with fibre-based products should be permitted, because these materials cannot be separated without greatly affecting output material quality.

Other suggestions – TEEP assessments

A few respondents suggest that any TEEP assessments should be applied across the whole value chain and that the Extended Producer Responsibility Scheme Administrator should be involved in the process.

Some respondents suggest that where producers are paying full net costs of packaging under Extended Producer Responsibility, they should have a role in assisting local authorities with TEEP assessments.

27.2. Question 65

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

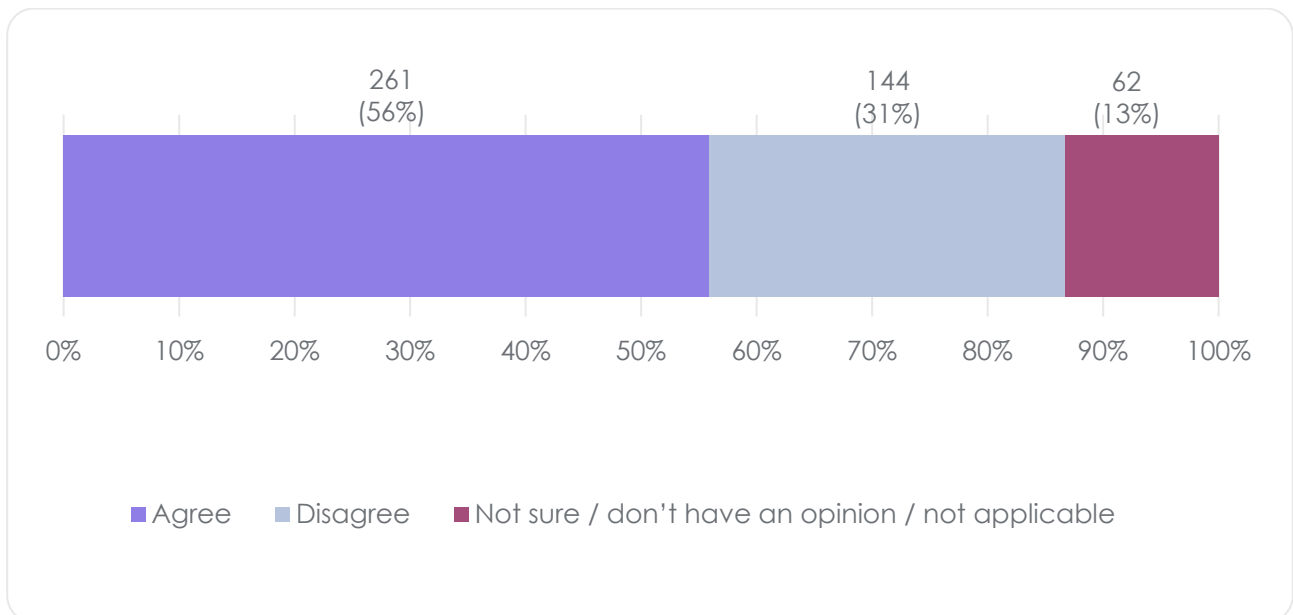


Figure 74 Question 65, (n=467)

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

This question was answered by 239 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Look for solutions instead of exemptions	8%	5%	0%	47%	23%	14%
Support General support	8%	1%	21%	0%	0%	14%
Concerns List not comprehensive	6%	0%	20%	0%	0%	3%
Suggestions Other examples End markets	3%	0%	9%	0%	0%	3%
Concerns Accountability / scrutiny	2%	2%	1%	0%	0%	17%

Support

Many respondents express general support that the proposed examples cover areas where it may not be 'technically practicable' to deliver separate collection.

Concerns

Many respondents express concerns that the proposed list of examples is not exhaustive and there could be other areas that need to be added.

Some respondent express general concerns that, although separated collections may be 'technically practicable', that does not necessarily mean they are the correct course of action.

Concerns relating to exemptions

Some respondents express concerns for how scrutiny of any TEEP exemptions would be carried out. Respondents make several suggestions for protocols surrounding TEEP exemptions. For example: exemptions should be reviewed at regular intervals to identify any ongoing issues and how to overcome them; TEEP exemptions should be subject to external/independent scrutiny; as well as both trade and business waste collectors being subject to the same TEEP exemption conditions to maintain a level playing field.

Some respondents express general concerns that none of the proposed examples represent sufficient justification for exemptions to source separated collections.

A few respondents express concerns that any opportunity for exemptions could be used as a barrier to system changes and any potential resulting benefits.

Suggestions

Suggestions – further consultation

Some respondents suggest generally that local authorities should be consulted to establish

any further examples to be considered under areas where it may not be 'technically practicable' to deliver separate collection.

Some respondents suggest that the Extended Producer Responsibility Scheme Administrators should have a clearly defined role in discussions relating to any further examples to be considered under areas where it may not be 'technically practicable' to deliver separate collection. Many respondents also suggest that costs associated with any proposed examples should be covered by Extended Producer Responsibility payments.

A few respondents suggest generally that industry bodies should be consulted to establish any further examples to be considered under areas where it may not be 'technically practicable' to deliver separate collection.

Defining 'technically practicable' – infrastructure and staffing considerations

Some respondents suggest generally that the lack of appropriate storage space for containers on premises should be considered under the proposed examples of where it may not be 'technically practicable' to deliver separate collection.

Some respondents suggest collection issues related to types of premises and accessibility should be considered under the proposed examples of where it may not be 'technically practicable' to deliver separate collection. For example: businesses located beneath flats; businesses without frontages; businesses with tight road access for collection vehicles; and businesses with access limited to certain times of the day.

A few respondents suggest generally that inadequate infrastructure should be considered under the proposed examples to cover areas where it may not be 'technically practicable' to deliver separate collection.

A few respondents suggest that factors relating to collection vehicle constraints should be considered under the proposed examples of where it may not be 'technically practicable' to deliver separate collection. For example: due to capacity of vehicles and availability of suitably trained staffed.

A few respondents suggest generally that suitable disposal arrangements not available in all areas should be considered under the proposed examples of where it may not be 'technically practicable' to deliver separate collection.

Defining 'technically practicable' – particular geographies and street scene constraints

Some respondents suggest generally that the rurality of some business properties should be considered under the proposed examples of where it may not be 'technically practicable' to deliver separate collection.

Some respondents suggest generally that the efficiency of collections should be considered under the proposed examples of where it may not be 'technically practicable' to deliver separate collection.

A few respondents suggest generally that health and safety implications should be considered under the proposed examples to cover areas where it may not be 'technically practicable' to deliver separate collection. For example: waste streams accumulating on pavements blocking pedestrian access; leakages/spillages from containers; as well as the impact of manual handling of heavy containers e.g. glass.

Other suggestions

Many respondents suggest generally that solutions to any challenges should be found through innovation and problem solving rather than allowing for exemptions.

Some respondents suggest generally that the availability of end markets should be considered under the proposed examples to cover areas where it may not be 'technically practicable' to deliver separate collection.

A few respondents suggest that likely level of compliance by businesses should be considered. Respondents suggest that businesses want quick, efficient, and cost-effective recycling services. Therefore, respondents suggest that co-mingled collection may be the preferred option for many.

A few respondents suggest that general financial impact and the impact of separated collections on local street scenes should be considered under the proposed examples of where it may not be 'technically practicable' to deliver separate collection.

27.3. Question 66

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

This question was answered by 358 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Areas Collection vehicle fleet constraints	15%	0%	49%	0%	0%	3%
Suggestions Areas Health and safety concerns	14%	0%	48%	0%	0%	3%
Suggestions Areas Infrastructure / space	14%	0%	47%	0%	3%	6%
Suggestions Areas Types of premises and accessibility	13%	0%	44%	0%	3%	6%
Suggestions Areas Staffing	13%	0%	44%	0%	0%	0%

Some respondents suggest no other examples of areas that are not 'technically practicable' to be considered as part of the proposal.

Concerns

Some respondents express general concerns for offering any opportunity for exemptions because they believe this would prevent beneficial changes to collection systems.

A few respondents express concerns that 'technically practicable' exemptions could affect collection consistency and cause confusion in areas where some premises produce multiple waste streams and others present co-mingled streams under exemptions for collection.

Suggestions

Some respondents suggest that where any potential examples of areas that are not 'technically practicable' are raised these should be viewed as problems to solve rather than applying exemptions. Some respondents suggest increased investment in innovation and technology to overcome any technical challenges.

A few respondents suggest that the Extended Producer Responsibility Scheme Administrator should have a clearly defined role in scrutinising TEEP exemptions.

Technically practicable assessment – infrastructure constraints

Many respondents suggest that several issues relating to collection vehicle constraints should be considered as part of the technically practicable assessment. For example: vehicle availability due to increased demand; availability of electric charging points for electric vehicles; as well as balancing stillage capacity in collection vehicles.

Many respondents suggest that several issues relating to premises type and accessibility should be considered as part of the technically practicable assessment. For example: premises located on narrow or congested roads limiting accessibility; office type such as businesses located in mixed use buildings e.g. below flats; as well as premises with limited access depending on time of day.

Many respondents suggest that inadequate infrastructure and space should be considered as part of the technically practicable assessment. Many respondents specifically suggest that this should apply where there is a lack of space at depots/transfer stations.

Many respondents suggest that staffing issues should be considered as part of the technically practicable assessment, because respondents feel there is a lack of qualified frontline staff and trained vehicle drivers to accommodate increased need due to separated collections.

Some respondents suggest that the ability to store and present containers at premises should be considered as part of the technically practicable assessment, because many smaller businesses or businesses with no frontages may lack sufficient space for multiple containers.

Technically practicable assessment - ease of compliance

A few respondents suggest generally that ease of recycling should be considered as part

of the technically practicable assessment, because respondent feel a simple system that is easy to use will produce more recycling.

Many respondents suggest that compliance/public support should be considered as part of the technically practicable assessment because separated collections may depend on businesses' willingness to participate.

Technically practicable assessment – environment, health, and safety

Many respondents suggest that several issues relating to health and safety concerns should be considered as part of the technically practicable assessment. For example: noise risk from materials such as glass; safety risk of unemptied aerosols; volume of lifting by collection crew is increased with more containers, therefore greater risk of muscular-skeletal injuries; and risk of attracting pests and vermin to kerbside waste containers.

Some respondents suggest generally that minimisation of littering and spilled waste should be considered as part of the technically practicable assessment.

Technically practicable assessment – other considerations

Many respondents suggest generally that permit and licensing restrictions should be considered as part of the technically practicable assessment.

Some respondents suggest generally that remoteness and rurality of a premises should be considered as part of the technically practicable assessment.

Some respondents suggest that availability of end markets should be considered as part of the technically practicable assessment. Many respondents suggest that where materials recovery facilities can show they are supplying sustainable end markets from co-mingled collection this type of collection should be allowed to continue.

A few respondents suggest that volume of waste should be considered as part of the technically practicable assessment. For example, where there is insufficient volume of a material in a waste stream to justify collection.

27.4. Question 67

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

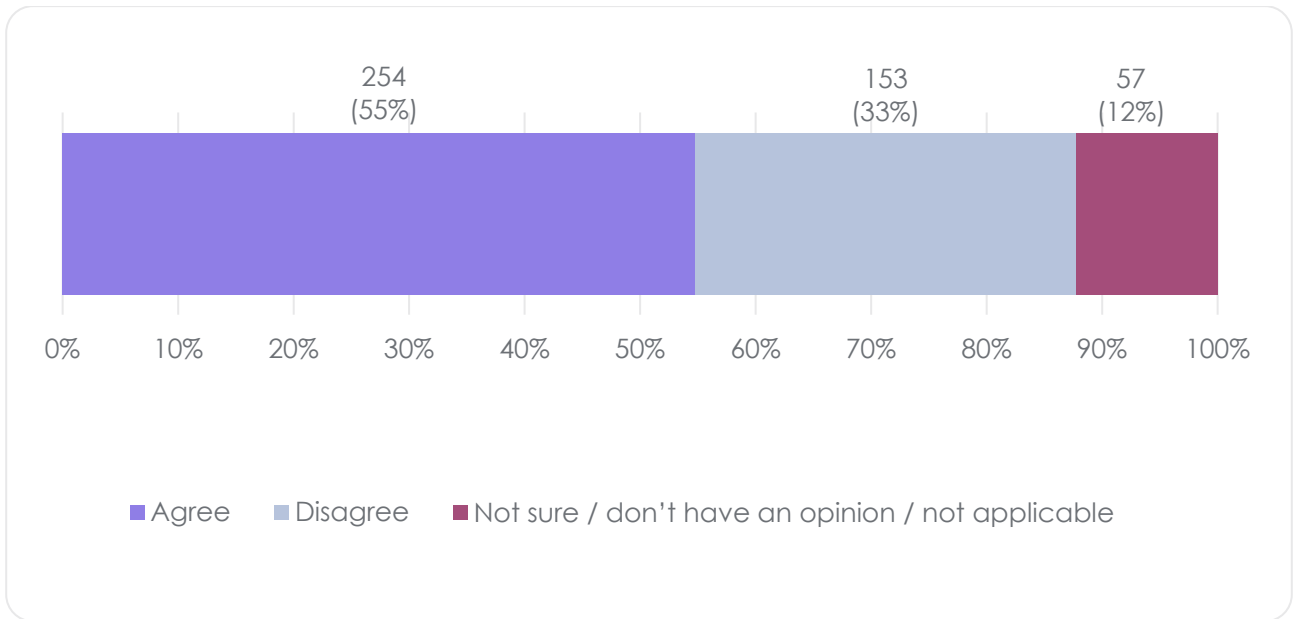


Figure 75 Question 67, (n=464)

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

This question was answered by 241 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Consider exemptions at franchising / zoning level	6%	0%	20%	0%	0%	3%
Concerns Exemptions create red tape	6%	0%	18%	0%	0%	3%
Concerns Exemptions permit inaction	5%	4%	0%	20%	6%	0%
Suggestions Include whole system costs	3%	0%	9%	2%	0%	3%
Suggestions Look for solutions instead of exemptions	3%	1%	0%	16%	23%	0%

Support

Many respondents express general support for the proposed exemptions of areas where it may not be economically practicable to deliver separate collection.

A few respondents express support for the proposed exemption on rurality and geography, agreeing that it may make some areas not economically practicable for separate collection. Some respondents state that rurality and geography should be the only permissible exemption.

A few respondents express support for the proposed exemption on types of premises and accessibility, agreeing that it may make some areas not economically practicable for separate collection.

Concerns

Concerns about exemptions

Many respondents express concern that granting exemptions to separate collection, for areas where it may not be economically practicable, will permit inaction on system change. Respondents state that the issues identified should not be treated as permanent barriers to greater recycling initiatives, that exemptions should be minimised, or that exemptions should not be automatically granted. Some respondents express concerns about local authorities being able to exempt themselves.

Many respondents express concerns that granting exemptions to separate collection will create bureaucracy and red tape, that will result in difficulties for individual businesses.

A few respondents express concerns with granting exemptions to separate collection based on cost. Respondents state that waste collectors should not be able to prepare assessments based on what is most profitable.

A few respondents express concerns about granting exemptions to separate collection based on rurality and geography. Respondents express concerns that businesses may purposely relocate to rural areas, to avoid separating their waste for recycling.

Other concerns

Many respondents express concerns about a perceived lack of detail and clarity in the proposal, in relation to the following: the term 'significantly more expensive', links to the Extended Producer Responsibility and its criteria for 'efficient and effective' service, whether written assessments will be needed for every site, how exemptions will be applied and assessed.

Some respondents express concerns that it is difficult to make an assessment on economic practicality when Extended Producer Responsibility funding is not clear. Some respondents express concerns about Extended Producer Responsibility payments for waste packaging.

Some respondents express concern that the proposed examples of areas where it may not be economically practicable to deliver separate collection are not comprehensive. Respondents state that, whilst they agree with the proposed exemptions, there may be other areas where it will not be economically practicable to deliver separate collection.

Suggestions

Many respondents identify a range of example areas where it may not be economically practicable to deliver separate collection. This includes:

- inadequate infrastructure and numbers of staff;
- staff training needs; contracts;
- communications;
- where it may not be profitable;
- where zoning/franchising is not established;
- where there is a lack of material in the waste stream; and
- collection vehicle fleet constraints.

These are fully summarised in Question 29.

How to evaluate assessments

Many respondents make varied suggestions about undertake assessments on exemptions, for areas where it may not be economically practicable to deliver separate collection. Respondents state that exemption assessments should be conducted on a case-by-case basis; should include whole system costs; should be open to public scrutiny; or that those seeking exemptions should have to provide evidence of the exceptional nature of their circumstances which make separate collection inappropriate.

Many respondents suggest that any consideration or granting of exemptions, for areas where it may not be economically practicable to deliver separate collection, should occur at the franchising / zoning level. Respondents state that a locality-based waste management plan would result in fairer provision for local communities and suggest it could be a smaller equivalent of a Joint Municipal Waste Management Strategy.

A few respondents suggest that the Extended Producer Responsibility Administrator and/or Extended Producer Responsibility producers, who pay for packaging collections, should have a clear role in defining and overseeing how 'not economically practicable' is applied.

Solutions and support focus

Many respondents suggest the proposed examples of not economically practicable areas should be treated as challenges to find solutions for and overcome, to enable the delivery of separate collection. Some respondents state that focus should not be on granting exemptions, but on resolving barriers.

Some respondents suggest that waste collection businesses should be supported to ensure that capture rates and material quality both remain high.

Other suggestions

A few respondents make varied suggestions about how best to recycle waste from non-household municipal premises, including: through household waste collections; through existing commercial collection methods; by creating an incineration tax, or by considering European Union guidance.

27.5. Question 68

27.5.1. What other examples of 'economically practicable' should be considered in this proposal? Be as specific as possible.

This question was answered by 386 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Specific examples Collection vehicle fleet constraints	16%	0%	48%	0%	0%	8%
Suggestions Specific examples Staffing	14%	0%	42%	0%	0%	6%
Suggestions Specific examples Contracts	13%	0%	42%	0%	0%	6%
Suggestions Specific examples Cost / availability of containers	13%	0%	42%	0%	0%	3%
Suggestions Specific examples End markets not ready	12%	0%	39%	0%	0%	6%

Some respondents state that there are no further examples of not economically practicable that should be considered.

Concerns

Some respondents express concerns that it is not clear how 'not economically practicable' will be determined in relation to Extended Producer Responsibility payments, and the various options for non-household waste put forward in the consultation.

A few respondents express concerns about granting exemptions to separate collection for non-household municipal premises. Respondents state that the examples of not economically practicable in the proposal should not be treated as permanent barriers to system change, or that granting exemptions risks undermining Government objectives for reform on recycling.

A few respondents express concerns about a perceived lack of detail in the proposal, in relation to the following: 'what degree of difference' should be considered material,

definitions, the impact of Covid-19, how economic cost versus environmental benefit will be judged.

Suggestions

Who decides

A few respondents suggest that the Extended Producer Responsibility Scheme Administrator and/or Extended Producer Responsibility producers, who pay for packaging collections, should have a clear role in defining and overseeing how 'not economically practicable' is applied.

A few respondents suggest that Government should decide on what counts as not economically practicable. Respondents state that exemptions will depend on Government willingness to impose its vision for recycling on producers and consumers.

Specific examples – cost implications

Many respondents suggest that other examples of not economically practicable should include where there is an initial and ongoing cost of communicating the scheme to businesses.

Many respondents suggest that other examples of not economically practicable should include a consideration of container costs and availability. Respondents express the same sentiments as those captured in Question 29.

Many respondents suggest that other examples of not economically practicable should include those cost incurred from breaking or changing existing contractual agreements. Some respondents state that several businesses already have established collection contracts in place designed around their particular needs. A few respondents state existing materials recovery facility contracts will not end until 2029.

A few respondents suggest that other examples of not economically practicable should include the financial costs of implementing a separate collection service for non-household municipal waste. For example, respondents state that long term costs burdens, the difference between cost burden assessments by two-tier authorities, and new costs, like costs from the implementation of new emission charging schemes, should be considered.

Specific examples – infrastructure and staffing

Many respondents suggest that other examples of not economically practicable should include those where there is not adequate infrastructure to run a separate collection service for non-household municipal premises. For example, respondents state that depot space for vehicle storage, the cost of new outlets or relocation, costs of creating additional capacity to make space for material separation and where businesses are located in relation to infrastructure should be considered.

Many respondents suggest that other examples of not economically practicable should include those where there are collection vehicle fleet constraints. Respondents express the same sentiments as those captured in Question 29.

Many respondents suggest that other examples of not economically practicable should include those where there are not adequate staffing levels to run a separate collection

service. Respondents express the same sentiments as those captured in Question 29.

Some respondents suggest that other examples of not economically practicable should include those where the contamination of waste streams by businesses will lead to rejected loads, and increased costs for local authorities.

A few respondents suggest that other examples of not economically practicable should include consideration for types of business premises and accessibility. Respondents state that the type and size of a business will affect their ability to separate their waste, and the frequency with which it needs to be collected. Respondents express concerns about the ability to store bins, or for waste collectors to access business premises.

Specific examples – cost/benefit considerations

Many respondents suggest that other examples of not economically practicable should include those where there are not sufficient end markets for non-household municipal materials. Some respondents suggest that the risk of market saturation and a resulting devalued recycle should also be considered.

A few respondents suggest that other examples of not economically practicable should include a consideration for where there will not be sufficient environmental benefit to providing a separate collection service for non-household municipal premises, for example if there is not enough volume of materials to merit collection. Some respondents state that carbon savings and greenhouse gas emissions should be assessed.

A few respondents suggest that further research is needed to make a judgement on what would make it not economically practicable to deliver a separate collection service to non-household municipal premises. Respondents state that examples should not be relied on, that robust guidelines for modelling cost assessments is required, and that zoning/ franchising arrangements should be expedited so that the cumulative impact of proposals can be assessed.

27.6. Question 69

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

This question was answered by 393 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Excessive costs Any increased costs	11%	1%	33%	0%	0%	3%
Concerns Relationship with EPR	10%	0%	30%	2%	0%	11%
Concerns Lack of detail in the proposal	9%	0%	29%	0%	0%	8%
Concerns Increased costs before 'excessive' threshold	8%	0%	27%	0%	0%	3%
Suggestions Set by Scheme Administrator	7%	5%	0%	27%	19%	17%

Some respondents state that they have no views on what might constitute excessive costs in terms of economic practicability.

Concerns

Defining excessive costs and level of detail

Many respondents express concerns about a perceived lack of detail in the proposal, in relation to the following: the type and level of evidence required to demonstrate excessive costs, the statutory requirements, the timeline, how trade-offs between costs and material quality will be decided, and how the proposal would be funded.

Many respondents express concerns about the term excessive costs, stating that it implies that local authorities will have to absorb a high degree of costs above standard before it is deemed not economically practicable to deliver a separate collection service to non-household municipal premises.

Some respondents express general concerns about who will define excessive costs and set the threshold for it.

Some respondents express concerns about the definition of excessive costs. For example, respondents state that: that the term needs to be defined, the term 'excessive' is subjective or unhelpful, that 'excessive costs' might differ or depend on the circumstances of local authorities, that 'excessive costs' cannot be meaningfully analysed until other Resources and Waste Strategy measures are confirmed.

Financial implications for different stakeholders

Many respondents express concern about the relationship between excessive costs in terms of economic practicability, and Extended Producer Responsibility. Respondents express concerns about the unknowns of Extended Producer Responsibility payments for non-household waste, and some respondents express concerns about tensions that may arise between local authorities and producers, over what producers are willing to fund as excessive costs.

Some respondents express concerns about excessive costs, stating that whilst Waste Collection Authorities can pass reasonable costs onto non-household waste producers,

having costs that are high but not deemed excessive will make Waste Collection Authorities anti-competitive, and may result in a lack of demand for local authority services.

Some respondents express concerns that local authorities will be forced into putting their own funding and resources into running a separate collection service to help packaging producers meet targets, that local authorities are not obliged to meet.

Suggestions

What constitutes excessive costs

Some respondents make varied suggestions about what other costs could constitute excessive costs in terms of economic practicability. For example: contamination costs, contract changing costs, costs of operating new collections, and costs of the end market material.

Some respondents suggest that any increases in costs from providing a separate collection service to non-household municipal premises in remote or rural locations should constitute excessive costs in terms of economic practicability.

Some respondents suggest that any increases in costs resulting from the expansion, improvement or storage of collection vehicle fleets should constitute excessive costs in terms of economic practicability.

Some respondents suggest that any increases in costs resulting from modifications to existing infrastructure, or acquiring new premises, should constitute excessive costs in terms of economic practicability. A few respondents suggest that any increases in staffing costs from running a separate collection service to non-household municipal premises should constitute excessive costs in terms of economic practicability.

of economic practicability.

Defining and calculating excessive costs

Many respondents suggest that any cost that increases total net costs, or any cost increase above the cost of current collection services should constitute excessive costs in terms of economic practicability. Some respondents suggest that any costs which would result in reduced provision for other services should constitute excessive costs. A few respondents suggest that costs may outweigh benefits if the volume of material recovered from separate collection does not cover the cost of its collection.

Some respondents make varied suggestions about how excessive costs should be mathematically calculated. For example, as a proportion, as more than 5% of existing costs, or as twice the average estimated variable costs of undertaking collections.

Some respondents suggest that the whole value chain, and whole system costs, should be included in defining excessive costs.

Some respondents suggest that costs of providing a separate collection service to non-household municipal premises should be benchmarked against best practice.

A few respondents suggest that, as excessive costs cannot always be expressed in monetary value, a set of principles should be applied to bring consistency to judgments of

excessive costs.

A few respondents suggest that excessive costs in terms of economic practicability should not be accepted as a reason for exemption from delivering a separate collection service to non-household municipal premises. Respondents suggest that businesses and local authorities can be supported and find new ways of working, to ensure that Government recycling objectives can be achieved.

Who should be involved in defining and deciding what constitutes excessive costs

Many respondents suggest that system obligated producers and businesses should be involved defining and deciding what constitutes excessive costs.

Many respondents suggest that excessive costs, in terms of economic practicability, should be determined, defined, and decided by the Extended Producer Responsibility Scheme Administrator. Some respondents suggest that the Extended Producer Responsibility Scheme Administrator should be the sole decision maker. Other respondents suggest that any decisions made by local authorities on excessive costs should have to be approved by the Scheme Administrator.

27.7. Question 70

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

This question was answered by 398 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Difficult to define / too many variables	12%	0%	35%	2%	3%	11%
Suggestions Set of principles	8%	0%	29%	0%	0%	0%
Concerns High threshold	8%	0%	28%	0%	0%	3%
Suggestions Scheme administrator / industry should define	7%	5%	0%	25%	13%	17%
None	4%	2%	5%	8%	6%	0%

Some respondents answered the question by saying they do not have any views on the proposals.

Concerns

Challenges defining/proving

Many respondents express concerns that the term 'significant' may be subjective and difficult to define. Some respondents believe that what is deemed 'significant' in relation to environmental benefits may vary between local authorities but think that case-by-case assessments should be avoided. Respondents suggest that a set of principles should be introduced to ensure an element of consistency between local authorities, without specifying what these principles could be.

Many respondents express concerns that the term 'significant' may suggest that a very high threshold of proof may be needed to prove that separate collection brings less of an environmental benefit, without specifying that the threshold is too high or should be lower.

Other concerns

Some respondents express general concerns about co-mingled collection because they believe that separate collection should be the norm, without explaining why.

A few respondents express concerns that private waste companies may be better able to win collection contracts for more lucrative materials, potentially putting local authorities at a disadvantage.

Suggestions

Defining 'significant' environmental benefits

Many respondents suggest that what should be considered 'significant' should be defined by the Extended Producer Responsibility Scheme Administrator. Some respondents also suggest that the Scheme Administrator should have a clearly defined role in supporting UK regulators in overseeing and challenging how TEEP is used locally. More specifically, they believe that scrutiny should be applied wherever the results of TEEP assessments move away from implementing the best environmental outcomes.

Some respondents suggest that what is considered 'significant' should be decided by local authorities, instead of being nationally prescribed.

A few respondents refer to page 59 of the consultation, which states that co-mingled collection should be considered as a last resort and references evidence that separate collection improves waste quality. Respondents suggest that Government should consider using this evidence to inform the definition of 'significant' environmental benefits.

A few respondents suggest that further research into what should be considered 'significant' in terms of environmental impact is needed, specifically through discussions with stakeholders in the waste management sector and producers obligated under the Extended Producer Responsibility system.

How it should be quantified and calculated

Some respondents make suggestions for how 'significant' environmental benefits could be quantified. Some suggest that an increase or decrease in carbon impacts could be

measured using percentages, with specific percentages being considered significant. Suggestions for thresholds include 5% and 15-20%.

A few respondents suggest that the whole value chain should be considered when making decisions about the proposal. Other respondents suggest creating a standard metric to measure environmental impacts to help define what environmental impacts are 'significant', without specifying how such a metric could work.

Suggestions – significant examples

Some respondents suggest that carbon impacts should be considered when defining the term 'significant' in terms of environmental benefits, with some specifying that environmental impacts should be measured in terms of total carbon emissions.

Some respondents suggest that the volume of material that is available for collection should be considered a 'significant' factor in terms of environmental benefits. For example, co-mingled collection may increase the volume of recyclable material that is collected. On the other hand, if only a small increase in volume occurs due to separate collection, then the cost may not outweigh the benefit.

Some respondents express concerns about the impact that additional collection streams, and therefore additional vehicles and journeys, may have on the environment and the public through carbon and noise pollution. Some respondents specify that these negative effects may outweigh some of the benefits of separate collection and should be considered 'significant' factors.

Some respondents suggest that contamination levels, the quality of recycled materials and the availability of end markets should be considered 'significant' when deciding the environmental impact of co-mingled collection compared to separate collection.

A few respondents suggest that the effects of co-mingled collection on fibre should be considered 'significant', because they believe that paper and card become unrecyclable when collected with plastic film.

A few respondents suggest that the availability and capacity of recycling facilities and infrastructure should be considered 'significant' factors, with some expressing concerns that current recycling infrastructure may be inadequate. Respondents also believe that requiring additional bins may lead to issues with storage space for businesses.

A few respondents suggest that the impact on 'the public realm' could be considered 'significant', without specifying further. Another respondent believes that householders may prefer co-mingled collection over separate collection.

Other suggestions

Some respondents suggest that co-mingled collection should be recognised as a legitimate option for businesses, and some believe that many top-performing recycling authorities currently operate co-mingled collection without compromising the quality of materials.

A few respondents suggest that the proposals should deliver the goals of Extended Producer Responsibility reforms, namely environmental goals, higher recycling performance, and cost-efficiency, without giving more detail on what could be

considered 'significant' in terms of environmental benefits.

A few respondents suggest that the costs of recycling collection should be covered by Extended Producer Responsibility payments instead of public funds, without relating this back to the use of the term 'significant'.

A few respondents suggest that collections from households and non-household premises should be consistent and subject to the same rules, without specifying what these should be.

27.8. Question 71

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

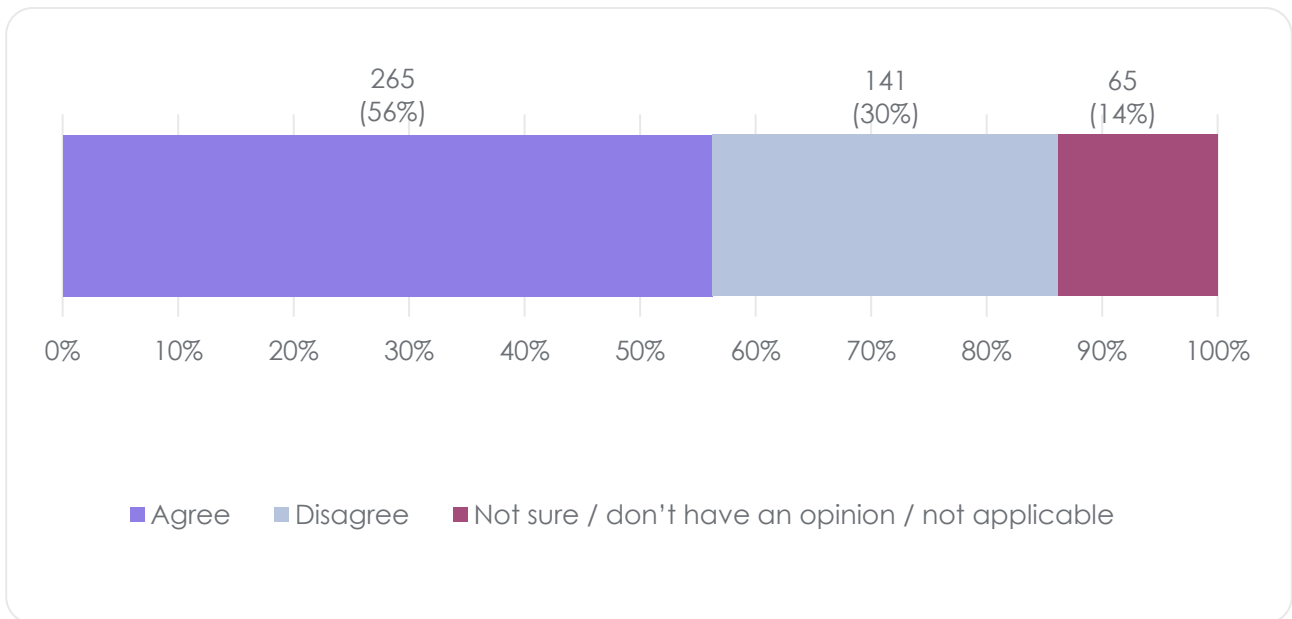


Figure 76 Question 71, (n=471)

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

This question was answered by 229 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5

Suggestions Apply at franchising / zoning level	6%	0%	20%	0%	0%	0%
Concerns Complexity / bureaucracy	6%	0%	19%	0%	0%	0%
Concerns Oppose exemptions	6%	5%	0%	16%	16%	17%
Suggestions Consider whole value chain / change over time	4%	2%	3%	8%	6%	11%
Suggestions Role of Scheme Administrator / producers	3%	1%	0%	12%	10%	0%

Support

A few respondents express general support for the proposed examples of 'no significant environmental benefit'.

Concerns

Potential difficulties for businesses associated with granting exemptions

Many respondents express concerns that granting exemptions to separate collection could create bureaucracy and red tape, that will result in difficulties for individual businesses.

Exemptions linked to availability of recycling facilities

Some respondents express concern with the proposed example, of using availability of recycling facilities as a way of measuring 'no significant environmental benefit'. For example, respondents state that the rationale of the Consistency in Household and Business Recycling and Extended Producer Responsibility consultations is to help underpin new collection and sorting infrastructure, so lack of facilities should not be an excuse.

'No significant environmental benefit' – comprehensiveness

Some respondents express concern that the proposed examples of areas where there may be no significant environmental benefit to delivering separate collection are not comprehensive. Some respondents state that whilst they agree with the proposed exemptions, there may be other areas where there will 'no significant environmental benefit'.

'No significant environmental benefit' – a potential 'get out clause'

Many respondents express concern that 'no significant environmental benefit' could be used as a get out clause to achieving Government environmental objectives. Respondents state that a once in a generation opportunity to improve waste management should not include exemptions.

Reject tonnages

A few respondents express concerns with the proposed example of using reject tonnages as a way of measuring 'no significant environmental benefit'. Respondents state that

reject tonnages are: an indication of where improvement is needed; that they indicate high quality and thorough sorting; and that they might be expected to increase alongside an increase in capture rates.

Lack of details in the proposal

Some respondents express concerns about a perceived lack of detail in the proposal and the examples, both in general and in relation to the following: the definition of the term 'significant', whether 'reject tonnages' equates to an increased capture rate, and how availability of and distance to recycling facilities will be measured.

Suggestions

'No significant environmental benefit' – decisions/application

Many respondents suggest that any consideration or granting of exemptions, for areas where there may be 'no significant environmental benefit' to delivering separate collection, should occur at franchising / zoning level. Respondents state that a locality-based waste management plan would result in fairer provision for local communities and suggest it could be a smaller equivalent of a Joint Municipal Waste Management Strategy.

A few respondents suggest that any exemptions granted under the guise of there being 'no significant environmental benefit' should be time limited, and open to review/ scrutiny.

Some respondents suggest that the Extended Producer Responsibility Administrator and/or Extended Producer Responsibility producers, who pay for packaging collections, should have a clear role in defining and overseeing how 'no significant environmental' benefit is applied.

A few respondents make varied suggestions about how 'no significant environmental benefit' could be decided, for example: by prioritising the waste hierarchy, introducing a standard metric, using compositional analysis, or a range of other indicators and calculations.

'No significant environmental benefit' – what to consider

Many respondents suggest that whole system impacts should be considered in 'no significant environmental' benefit, and that these assessments should involve the whole value chain. For example, respondents state the environmental benefits occur in various places within the system over time, that no one single body or authority can recognise, so all perspectives within the chain should be considered.

A few respondents offer varied suggestions about what other examples should be considered in 'no significant environmental benefit', for example: local air quality, likely participation and capture rates, carbon impacts from sorting and collection, and technologies to ensure quality recycle.

A few respondents suggest that Government environmental criteria should be applied in a way that does not stifle any future innovations into recycling technology, to future proof a comprehensive system.

27.9. Question 72

27.9.1. What other examples of 'no significant environmental benefit' should be included in this proposal? Please be as specific as possible.

This question was answered by 378 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Other examples Carbon footprint / increased emissions	18%	1%	53%	0%	0%	8%
Suggestions Other examples Output quality / quality of materials	12%	0%	39%	0%	0%	6%
None	7%	5%	5%	16%	10%	22%
Suggestions Other examples Availability / type of end markets	4%	0%	12%	0%	0%	0%
Concerns Lack of detail in proposal	3%	0%	9%	0%	0%	3%

Many respondents state that there are no other examples of 'no significant environmental benefit' that should be included in the proposal.

Concerns

Some respondents express concerns with a perceived lack of detail in the proposal, in relation to the following: how TEEP will be used in determining new services, how trade-offs between all facets of TEEP will be judged, lack of consideration for carbon emissions and the environmental impact of transporting material, that it is unclear what the service changes will be.

Some respondents express concern with awarding exemptions to providing a separate collection service for non-household municipal premises based on there being 'no significant environmental benefit'. Some respondents state that as businesses have not been allowed to exclude areas, neither should local authorities. A few respondents express concern for the broadening of TEEP, and other respondents state that granting

exemptions risks undermining Government objects for recycling reform.

Suggestions

What to include – environmental impacts

Many respondents suggest that other examples of 'no significant environmental benefit' should include a consideration for increased emissions and carbon impacts. Some respondents state that delivering a separate collection service to non-household municipal premises could result in negative environmental impacts because of increases to collection vehicle fleets.

Some respondents suggest that other examples of 'no significant environmental benefit' should include a consideration of negative local impacts. For example, worsening of local air quality, potential street scene issues from escaped waste, and increased littering.

What to include – infrastructure

Some respondents suggest that other examples of 'no significant environmental benefit' should include a consideration for the replacement and introduction of new recycling containers. Respondents state that containers might be replaced before end-of-life, and other respondents state that an increased number of containers could have a negative impact on the street scene.

A few respondents suggest that other examples of 'no significant environmental benefit' should include a consideration for availability of appropriate sorting and treatment technology. Respondents state that without the established infrastructure to deal with waste streams, there may be contamination or local quality material that will not be accepted by end markets.

What to include – end markets and quality of materials captured

Many respondents suggest that other examples of 'no significant environmental benefit' should include a consideration for the quality of materials captured.

Some respondents suggest that other examples of 'no significant environmental benefit' should include a consideration for the availability of end markets. Respondents state that end markets for materials from businesses, such as labels, glues, and LDPE/PVC/PP films, do not currently exist, or that separate collection provides no significant environmental benefit if materials are disposed of for energy recovery.

A few respondents state that all issues are challenges which need to be overcome, to achieve Government environmental goals.

Definition and calculation

Some respondents suggest that other examples of 'no significant environmental benefit' should include a consideration for understanding of the scheme, as this can impact compliance.

Some respondents suggest that where a co-mingled collection will result in higher business participation and greater capture rates of materials, then there would be no significant environmental benefit to delivering a separate collection service.

A few respondents make varied suggestions about how 'no significant environmental

benefit' should be defined and calculated. For example, respondents suggest that standardised metrics, or mathematical calculations of 'no significant environmental benefit' should be created. Other respondents suggest that the Extended Producer Responsibility Scheme Administrator should have a clearly defined role.

28. Proposal 25: Compliance and enforcement

28.1. Question 73

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

This question was answered by 402 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Written assessment Standardise / template	19%	2%	61%	0%	0%	8%
Suggestions How to evaluate assessments	14%	0%	43%	2%	3%	14%
Suggestions Written assessment Easy to access / online	11%	0%	39%	0%	0%	3%
Suggestions Written assessment Keep simple	11%	0%	36%	0%	3%	6%
Suggestions Written assessment Administrative zones	9%	0%	30%	0%	0%	3%

Concerns

A few respondents express concerns about the Environmental Agency's capacity to assess and enforce TEEP assessments on a vast number of businesses in a timely manner.

A few respondents express concerns that written assessment requirements are wholly unrealistic and express general disagreement with putting any additional burdens on businesses.

A few respondents express general concerns that the proposal has a lack of detail and request further clarity on a number of points, including:

- any potential sanctions on business waste collectors;
- obligation of the waste producer to follow TEEP assessments;
- the written assessment process as a whole; and

- clarification on where liability and enforcement for TEEP assessment sits.

Suggestions

Many respondents suggest that written assessments should be as simple as possible to reduce administrative burdens on waste collectors and producers. For example, respondents suggest:

- use of a standard template in which responses are limited to a tick box format and free form entries avoided so as to eliminate any need for intensive subjective assessment;
- inclusion of transparent calculations in templates to support waste producers to identify areas where they can improve;
- provision of good practice guidance to clarify the standard required when completing written assessments; and
- the use of an online form to ensure ease of completion.

Many respondents further suggest that written assessments should be conducted at a franchise/zoning/local authority level rather than by individual businesses as this could provide consistency across the area as a whole.

Some respondents suggest that labelling written assessments as burdens encourages local authorities to minimise their efforts. Respondents suggest that the emphasis should instead be on optimisation of collection and recovery of materials in order to achieve wider Government environmental aims.

Some respondents make a number of suggestions for ways to make compliance easier for waste collectors and producers, including:

- giving waste collectors and local authorities enforcement powers over businesses;
- changing waste carrier licences so that they are specific to the type of material being collected;
- provision of funding to support the additional requirements created through written assessments;
- delaying the deposit return scheme to give time to fully understand the impacts of Consistency in Household and Business Recycling and Extended Producer Responsibility.

A few respondents make a number of suggestions for circumstances where compliance may not be practicable, including:

- premises in remote locations with no waste company to provide business collection services;
- business premises with issues of accessibility;
- where there is a lack of availability of containers or storage capacity at premises for containers; and
- where there is a lack of storage capacity at existing infrastructure, for example depots or waste transfer stations.

A few respondents suggest businesses should be properly supported with the necessary services for residual waste, recycling and, if applicable, food waste to allow them to comply with regulations wherever possible.

28.2. Question 74

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

This question was answered by 391 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Factors Containers / storage space at premises	13%	1%	42%	0%	0%	6%
Suggestions Factors Zoning requirements	10%	0%	35%	0%	0%	3%
Suggestions Factors Health and safety / duty of care / regulations	10%	0%	34%	0%	0%	6%
Suggestions Factors Digital access to containers	9%	0%	29%	0%	0%	6%
Suggestions Involve EPR Scheme Administrator / packaging value chain	7%	5%	0%	25%	16%	19%

Support

A few respondents express support for the written assessment and indicate that they would be content to see other factors included, so long as this aided transparency and did not limit the reliability of the overall assessment.

Concerns

Many respondents express concerns about health and safety implications of collective container provision that is shared between businesses in one franchise area or zone. Respondents note that this would be subject to considerations relating to duty of care obligations.

Some respondents express concerns about the environmental impacts of increasing the number of waste streams and question whether this results in a net carbon gain due to

increased carbon emissions during the collection, transfer, and processing of materials.

A few respondents express concerns about the complexity of the written assessment and request that, to minimise disengagement, any written assessment of non-household waste should be simple for businesses to complete. Respondents suggest that any audits use closed questions with pre-defined responses and keep open questions that require subjective assessment to a minimum.

A few respondents express concerns about end markets and fluctuating market prices for materials, noting that while it may be possible to collect a material, if recycling costs are too high or an end market not identified, the process is no longer economically practicable.

A few respondents express concerns about exemptions and dispensations and highlight the importance of consistency for all without any loopholes.

Suggestions

Many respondents suggest that consideration is given within the written assessment to the issue of space, and particularly the use of collective container provision that is shared between businesses. Respondents note that while this may reduce the number of recycling containers on public streets, the assessment will also need to consider issues such as contamination and misuse, security and duty of care, hygiene and cleanliness, and planning requirements for future property developments.

Many respondents suggest that, if business collections are undertaken on a zoning basis, then written assessments may need to include details on the zoning requirements. They note that there may need to be several different collection methods within each zone to take account of the different business sizes and characteristics in each zone.

Many respondents suggest the written assessment explore the possibility of use of secure digital access to containers, for example RF transponders ('bin chipping'), on bin lifts to enable businesses to just pay for the waste/recycling they produce. Respondents suggest that the costs associated with this technology may be lower when spread across a zone or franchise area.

Many respondents suggest that the role of the Scheme Administrator for Extended Producer Responsibility should be to support local authorities to develop their services and identify solutions through drawing on best practice knowledge. Respondents suggest that this role could also oversee and challenge the use of TEEP, using these assessments to trigger external scrutiny processes on waste collectors when local environmental outcomes are not being met.

Some respondents suggest that any written assessment considers the availability, capacity, and maintenance costs of local infrastructure, including maintenance of new, larger depots, larger fleets of vehicles, and availability of transfer stations and reprocessing plants.

Some respondents suggest that written assessments should include information on types of premises, density, location, and issues of accessibility for collection vehicles. Respondents suggest that written assessments may benefit from more detailed planning for airports, seaports, rail terminals, and shopping centres due to security requirements at such

locations.

Some respondents suggest that costs are taken into consideration, for example:

- costs for provision and delivery of new containers;
- costs due to contractual changes;
- costs due to loss of economies of scale (low tonnages and/or multiple collections);
- costs for procuring new vehicles, drivers, and crew to keep materials separate;
- costs to communicate changes to the public;
- costs of expanding or moving depots; and
- costs due to loss of gate fees.

Some respondents suggest that the written assessment should take type and volume of waste into consideration to understand current levels of waste generated. Respondents suggest that it will be important to assess economies of scale for each potential waste stream alongside the potential impact on market prices as a result of market saturation.

Some respondents suggest that rurality and geography should be included in the written assessments to ensure that regional differences, such as distances to tipping points, depots, transfer stations, and reprocessing plants, are considered.

Some respondents suggest that business size and type, along with density of premises, in an area or zone should be taken into consideration within the written assessment.

Some respondents suggest that any written assessments include an analysis of the logistics of increased collections, including:

- vehicle availability and lead-in times for new fleets;
- congestion, both on roads and at transfer sites or depots;
- number of lifts per vehicle and access to locations;
- journey lengths and journey efficiencies; and
- parking and maintenance of vehicles.

A few respondents suggest that written assessments should include an analysis of local needs, including an assessment of communication needs for different population groups. Respondents suggest that effective communication is important to ensure acceptance of the new schemes from the local population.

A few respondents suggest that the written assessments should be remodelled to include perspectives from across the whole value chain, rather than from the waste collector's perspective (as is currently the case with TEEP assessments). Respondents suggest that the written assessment could include the following factors:

- the process of gathering, sorting, and storing waste in shared premises, for example within shopping centres;
- the evaluation of potential adverse impacts on participation as a result of increased source segregation requirements on householders;
- the three components of TEEP – technical, economic, and environmental factors;
- any information that helps analyse whether separate collection is technically or economically practicable; and
- any information that helps to analyse the associated environmental benefits.

A few respondents suggest that there is a need to develop good quality guidance to support the completion of written assessments, including examples of good practice and case studies. Respondents also request confirmation that detailed feedback would be provided if written assessments were not accepted by the Extended Producer Responsibility Scheme Administrator.

Other areas requiring further clarity identified by respondents include:

- the garden waste streams for non-household waste;
- the expected contribution of waste collectors and businesses to the written assessment; and
- the governing body or agency that will oversee the assessment process.

A few respondents suggest that the written assessment process may be simpler and better able to deliver the outcomes sought if the current deregulated waste collections were replaced with a zoning / franchising system driven by the local authority.

A few respondents suggest that any written assessment should include social and demographic information about collection areas, including an analysis of potential compliance and need for enforcement actions.

A few respondents suggest that other factors to be taken into consideration include:

- availability and cost of land;
- cost implications for 2-tier situations when waste control authorities legitimately reach different conclusions;
- type and nature of businesses;
- assessment of willingness of businesses to participate; and
- potential loss of food waste arising from co-collections.

A few respondents suggest that staffing and vehicle/fleet availability should be included in the written assessments to understand current levels and capacities, identify skills shortages, and assess the impact of fleet depreciation timescales.

A few respondents suggest that any written assessments be suspended until after the implementation of Extended Producer Responsibility and the deposit return scheme. Respondents suggest that any written assessments completed prior to implementation may be rendered invalid due to the rapidly changing macro-economic environment.

A few respondents suggest that there should be standardised assessments for all waste collectors across one local authority area. Respondents note that they believe it is important to ensure a level playing field and prevent collectors using different assessments to justify collection methods.

A few respondents suggest that written assessments of non-household waste align with household waste assessments where possible to maximise efficiencies.

A few respondents suggest that there should not be a written assessment but rather a data driven approach using a standard spreadsheet format within a fixed ready reckoner. Respondents recognise, however, that this will not capture nuances and that there should be scope for subjectivity and interpretation.

A few respondents suggest that the assessment should not be fully prescriptive and

embed flexibility to allow for local issues and specific business needs to be raised and methods justified.

A few respondents suggest that due to variability in waste streams, waste volumes, and premise types, non-household waste recycling collections require bespoke assessments that identify and meet specific needs. Respondents further note that within non-household waste management services, each business is a customer and therefore more nuance is required in service procurement and delivery than for household recycling services.

A few respondents suggest that consideration be given to whether to allow neighbouring local authorities to use the same facilities.

28.3. Question 75

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

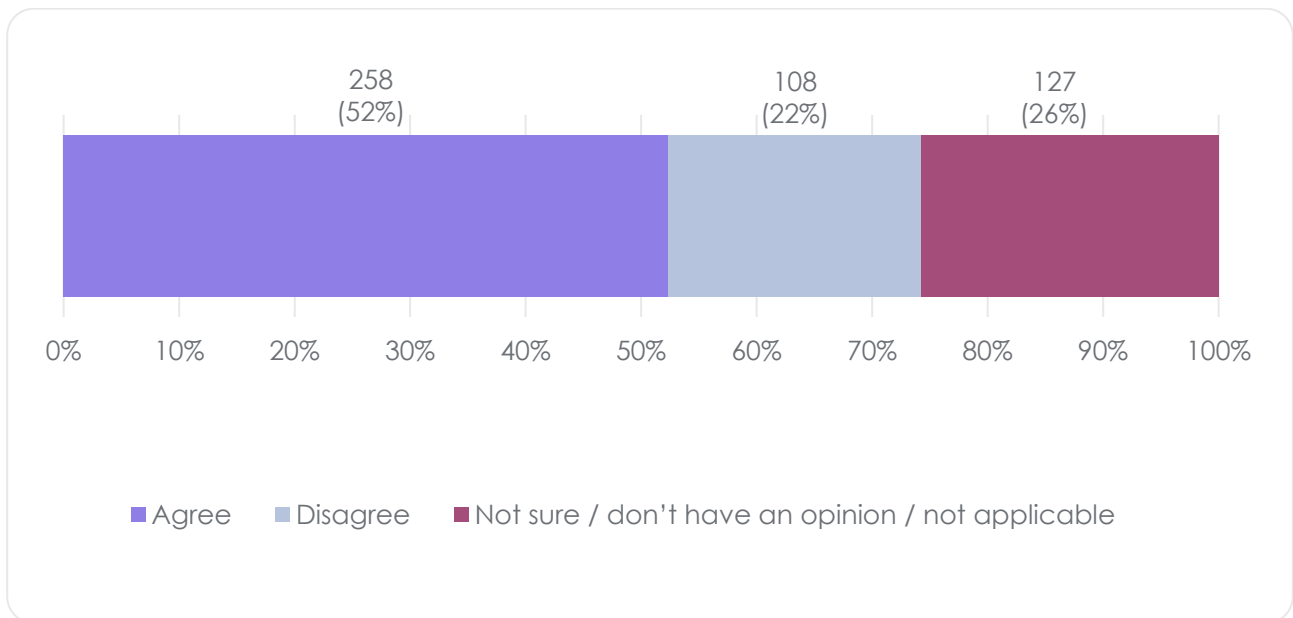


Figure 77 Question 75, (n=493)

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

This question was answered by 261 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5

Support Effectiveness	11%	3%	21%	10%	3%	28%
Concerns Oppose default values	8%	0%	24%	0%	0%	11%
Suggestions Use a range of values	7%	0%	22%	0%	0%	6%
Suggestions Involve Government, EPR Scheme Administrator and the packaging value chain	6%	5%	0%	18%	13%	19%
Support General support	6%	2%	12%	4%	0%	3%

Support

Many respondents express support for the development of standard default values where none currently exist and note that this may encourage buy-in and compliance. Respondents also note that any assessment of exemption should be objective to ensure a fair and balanced system.

Some respondents express support for the use of default data and values as they believe that this will provide a common industry benchmark.

Some respondents express support for standardisation of values as this may provide a benchmark and improve consistency across local authority assessments, while the use of a template could reduce the administrative burden. Respondents express further support for a standardised approach to assessing carbon factors and environmental impacts.

Concerns

Many respondents express concerns about the use of default values and note that these should not be mandatory. Respondents suggest that local authorities be encouraged to use their own values as much as possible.

Some respondents express concerns about the lack of detail in the proposal and note the importance of seeing the default values and data before commenting further.

Respondents suggest that Government publish the standards by which local data should be produced for further consultation. Respondents also express concerns about whether businesses would be able to adjust the template if required.

Some respondents express concerns that the use of standardised default values will prevent accurate measurement and representativeness of local circumstances.

Some respondents express concerns that decisions on exemptions should be made based on individual circumstances rather than default values. Respondents express further concerns that the use of default values will present the potential for businesses to not fully examine their own circumstances and use default values as a means by which to opt out and not deliver an appropriate service.

A few respondents express concerns that the use of default values would make application for exemption too easy, potentially leaving the process open to abuse. Respondents express further concerns that as there should be no grounds for exemption,

there should be no requirement for a written assessment.

Suggestions

Many respondents suggest that, if default values are to be used at all, a range of default values should be developed to increase representativeness and allow for local variances. Respondents suggest that the use of a default range of values, as opposed to one default value, may make the assessment more meaningful and accurate.

Many respondents suggest that defining the standard default values and data needs involvement from Government, the Extended Producer Responsibility Scheme Administrator, and the packaging value chain, as well as the four UK regulators. Respondents suggest that the standard default values and associated data must be part of an overall TEEP framework to ensure deliverability.

Many respondents suggest that default values can be over-written with real data where this is available. Respondents request clarification about how local, individual service circumstances and demographics will be addressed and how default values will be tailored for local circumstances. Respondents suggest that a model be developed whereby local authorities can input their collection scenarios to determine whether they are technically and economically practicable and calculate the environmental benefit to segregating certain streams.

Some respondents suggest that any data or values used must be based on up to date and robust data and research, and properly and independently peer reviewed prior to use. Respondents further suggest that default values should be approved by the Scheme Administrator.

Some respondents suggest that there may be cases for exceptions and therefore there should be opportunities to state and explore these within the process.

A few respondents suggest that there should be a certain amount of flexibility to add information and edit the template as needed.

A few respondents suggest that tonnage data should be provided by waste collectors and note that this information is sometimes not provided at present due to it being classified as commercially confidential.

A few respondents suggest the use of an online assessment to improve efficiency.

28.4. Question 76

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

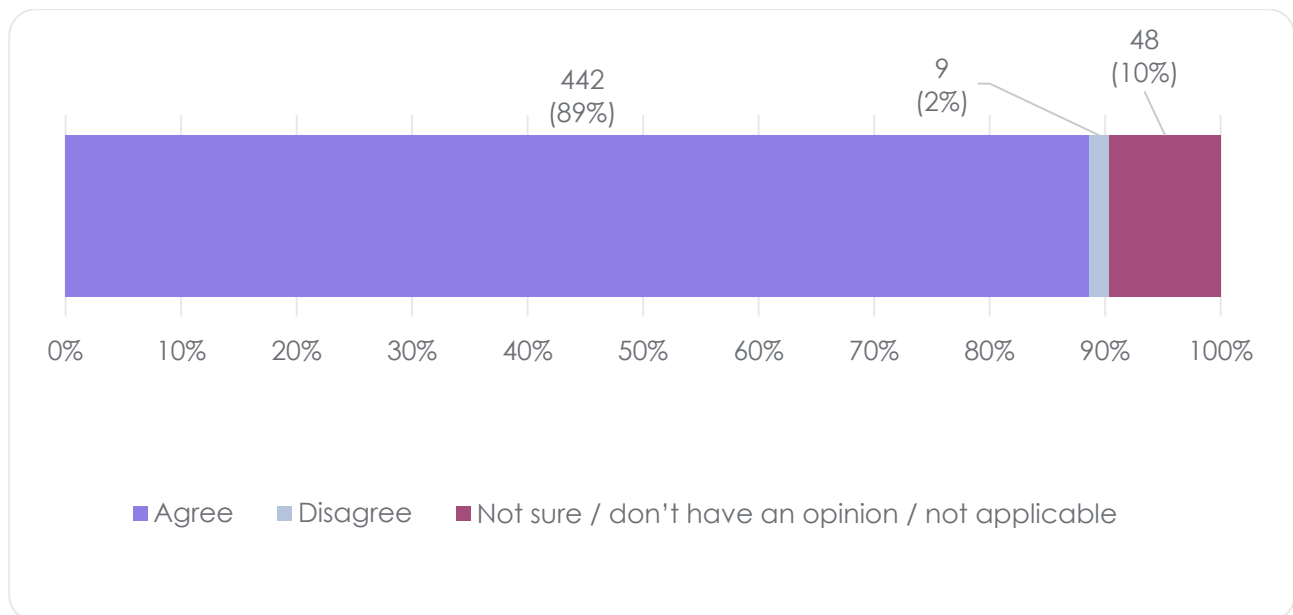


Figure 78 Question 76, (n=499)

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

This question was answered by 196 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Suggestions Flexibility	7%	0%	24%	0%	0%	3%
Support Will lead local authorities to review every aspect to drive up standards	4%	4%	0%	14%	3%	14%
Support General support	4%	1%	7%	0%	13%	6%
Support Support with caveats	2%	0%	8%	0%	0%	0%
Suggestions Template design / use	2%	0%	3%	2%	3%	0%

Support

Many respondents express support for the use of a standardised template for a written assessment as they feel that this may lead local authorities to review every aspect of their service and may drive up standards.

Many respondents express support for the use of a standardised template for a written assessment to support local authorities and facilitate national consistency if there is some flexibility to allow for local circumstances.

Some respondents express support for the use of a template if it is not too restrictive or directive.

A few respondents express support for the provision of any templates that enable businesses to complete their own assessments without the need for external support.

A few respondents express support for the use of a template for the written assessment as they believe that a standardised format or template would ensure consistency and transparency in how the assessment would be considered.

Concerns

A few respondents express concerns about lack of clarity in the proposals about whether the regulator will be required to review each submission and assess whether exceptional circumstances apply. Respondents note the importance of adequate policing and clear guidelines for the granting of exemptions. Respondents request further clarification about whether the template could be delivered at franchising/zoning level rather than the level of individual premises.

A few respondents express concerns about the use of a written assessment as they believe that there should be no exemption. Respondents express further concerns that requiring businesses to complete written assessments is an unnecessary burden that is not essential to implementation of wider reforms.

Suggestions

Many respondents differentiate between a template and a form, noting that while the template needs to be comprehensive there should be some flexibility to add information and edit the template. Respondents suggest that the template should be adaptable to include local perspectives and be flexible enough to recognise specific business needs, particularly for small and micro businesses.

Some respondents suggest the use of an intelligent spreadsheet where all areas for assessment are defined, and a new tab used for each local authority within the defined service area. Respondents suggest that this would enable a coordinated and consistent approach and reduce resources for completion. Respondents suggest that the development of default data and values needs involvement from Government, the Extended Producer Responsibility Scheme Administrator, and the packaging value chain.

Some respondents suggest that Government ensure the template accurately reflects the impact of the deposit return scheme and wider Extended Producer Responsibility changes. Respondents also suggest that the template be used to ensure consistency and transparency of interpretation. Respondents further suggest that Government provides

clear guidance and training.

Some respondents suggest that any template be part of an overall framework agreed by the Extended Producer Responsibility Scheme Administrator and the four UK regulators. Respondents further suggest that the Extended Producer Responsibility Scheme Administrator has a clearly defined role in supporting the four UK regulators to oversee and, if necessary, challenge the local use of TEEP.

A few respondents suggest that Government focus on ensuring that any exemptions are limited, with the onus being on the collector to prove need for exemption. Respondents suggest that all written assessments be rigorous, reviewed and required to provide a cogent and reasoned explanation to justify exemption through exceptional circumstances.

A few respondents suggest that there needs to be stronger TEEP requirements, going beyond the need for a written assessment, with clarity about where TEEP exemptions will or will not apply. Respondents further suggest that this needs to be rigorously enforced by the regulator to ensure that Government's aim to encourage separation of waste is achieved. Respondents suggest the use of incentives to encourage businesses to recycle more.

A few respondents suggest that further consultation is required to ensure any templates used are fit for purpose.

A few respondents suggest that the template should align with the household collection assessment so that there is consistency between the two approaches.

28.5. Question 77

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

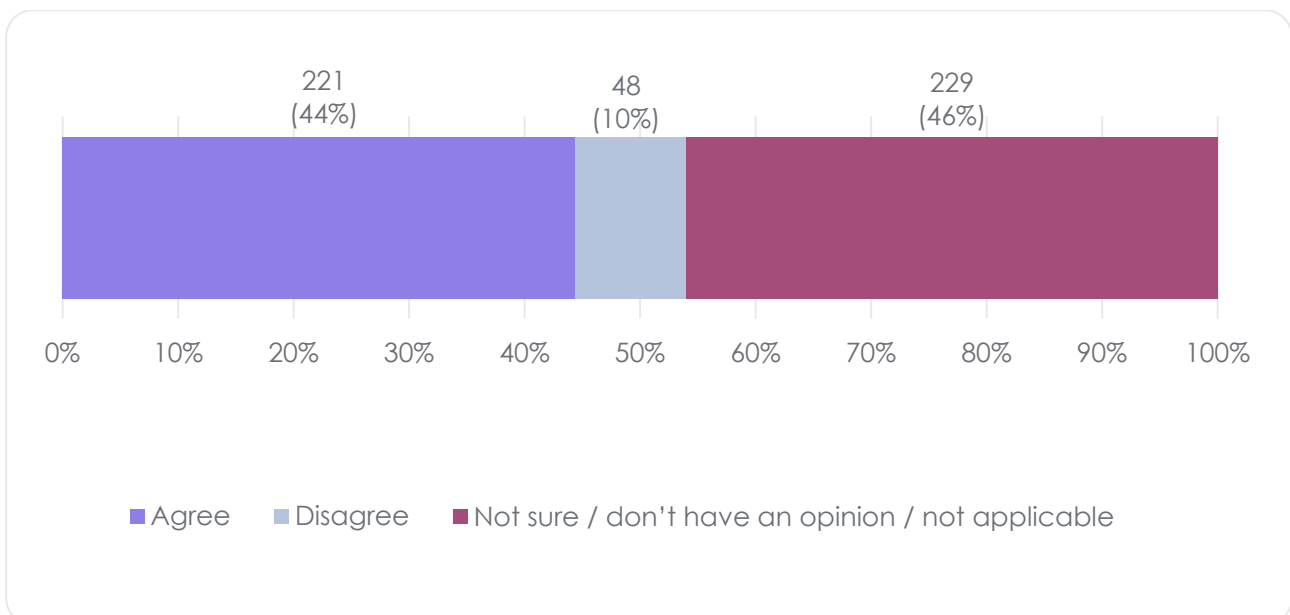


Figure 79 Question 77, (n=498)

28.5.2. Comments

Question 77 was a closed question which did not give space for comments. However, some respondents made comments in emails, or in response to other questions, which were labelled as being for this question. Their comments are summarised below.

Support

Many respondents express broad support for the proposed approach and note that the proposals could deliver greater separation of waste in certain circumstances.

Some respondents express support for a written assessment and note that this process may encourage businesses to seriously consider recycling more of their waste. Respondents note, however, that businesses may be more likely to respond positively and increase recycling through financial incentives and, if necessary, enforcement.

Concerns

Many respondents express concerns about the challenges faced by small and micro businesses in managing and having their waste collected separately. Respondents note that they believe it is important to not underestimate the scale of these challenges, for example space requirements for multiple waste containers, and raise concerns about how these processes will be enforced. Respondents express further concerns that requiring businesses to complete written assessments constitutes an unnecessary burden that is not material to implementation of the wider Consistency in Household and Business Recycling and Extended Producer Responsibility reforms and therefore suggest that written assessments should not be required.

Many respondents express concerns about the move to single waste streams and note that local authorities and other waste collectors already provide good co-mingled non-household waste collections that deliver a quality material for markets. Respondents therefore suggest that there needs to be an assessment of the value in increasing costs of collection against a) the increase in quality of material achieved and b) the environmental impact of increasing vehicle numbers.

Some respondents express concerns about the lack of formal approval process for the written assessment to ensure validity for a given period. Respondents note that without this assurance local authorities may be reluctant to change collection arrangements, procure new vehicles or enter into new contracts, due to the risk of a judicial review.

A few respondents express concerns over the length of time it would take to for local authorities and businesses to complete the written assessments, and the time it would take for an appropriate body to review and approve the written assessments for both household and non-household waste.

A few respondents express concerns about the lack of clarity on legal duties and compliance, including what will be classified as non-compliant practice, who will assess compliance, and how compliance will be monitored. For example, if recycling containers are offered but the customer either refuses or doesn't use them, respondents request further information about the impact that this would have on compliance rates for the

collection service.

A few respondents express concerns about whether the proposals as they stand will help to achieve delivery of the overall objectives of the packaging reforms for non-household municipal collections.

A few respondents express concerns about the lack of clear benchmark for significant environmental impact and note that the lack of clarity may leave TEEP open to interpretation. Respondents specifically highlight the issue of 'bin blight', or multiple container use, in areas of with vibrant night-time and visitor economies.

Suggestions

A few respondents suggest that the validation of the written assessment should be for a period sufficient to enable local authorities to change collection arrangements, procure new vehicles, and award new contracts.

A few respondents suggest that they would like further clarification of the written assessment approval process.

A few respondents suggest that more detail is needed on the written assessment approval process. Respondents further suggest that an assessment of increased collection costs against increased quality of material and environmental impact should be included.

29. Proposal 26: Costs and benefits

29.1. Question 78

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

This question was answered by 388 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Additional / ongoing costs	12%	4%	30%	16%	3%	8%
Concerns Relationship with DRS / EPR	12%	5%	23%	16%	10%	25%
Concerns Lack of detail	12%	0%	39%	2%	0%	11%
Concerns Familiarisation / contract / set up costs	6%	0%	18%	4%	0%	8%
Concerns Too many recycling streams / containers	3%	0%	10%	0%	0%	0%

Some respondents state that they have no other comments or evidence, on familiarisation costs and ongoing costs to households and businesses, to add.

Support

A few respondents express general support for the changes proposed in the consultation, on the basis that they would not be difficult to understand or for households to adjust to.

A few respondents express general support for the changes proposed in the consultation, on the basis that they will result in more recycling.

Concerns

Many respondents express concerns about the ongoing and potentially increasing costs of the proposed changes for households and businesses. Some respondents express concerns that additional costs will be higher if there is a phased approach to implementation. Other respondents give examples of ongoing costs and their effects on

households and businesses, including:

- garden waste collection charges;
- container replacement costs;
- costs to those in rural locations;
- costs of red tape;
- costs of communications;
- time and effort to sort and separate waste; and
- enforcement and engagement

Many respondents express concerns about the proposed changes in relation to Extended Producer Responsibility and the deposit return scheme.

- In relation to the deposit return scheme, respondents express concern about cost implications if the deposit return scheme proves unsuccessful, or express concerns about the effect on volumes and value of metal, glass, and plastic.
- In relation to Extended Producer Responsibility, respondents express concern that examples of the cost of previous service changes for local authorities will not relate, or fully reflect the demands of the proposed changes in the Consistency in Household and Business Recycling and the Extended Producer Responsibility consultations.

Many respondents express concerns about a perceived lack of detail in the proposed changes, in relation to the following requirements and extent of the proposed changes, funding of the proposed changes and unknowns in the Extended Producer Responsibility consultation. Some respondents express concerns about how local authorities could produce detailed plans for the proposed changes, or comment that there are difficulties in quantifying familiarisation costs, given that there are many unknowns.

Some respondents express concerns about the willingness of households to comply with the proposed changes, stating that the main familiarisation cost of the proposed changes will be the lack of effort on households part to familiarise themselves with the requirements. Respondents express a concern that the proposed measures may add unnecessary complexity and effort to waste management for households. A few respondents suggest that the main cost to households will be the time they spend meeting sorting requirements.

Many respondents express concerns about the complexity associated with placing a monetised value on familiarisation costs. Some respondents suggest a more detailed assessment is required to determine familiarisation costs, whilst a few respondents make estimates of familiarisation costs of between £2-£3.50 per household for the necessary communication campaigns. Some respondents give examples of familiarisation costs and their effects on households and businesses, for example: fees for duty of care documentation, costs for assessments of physical capacity, contract changes, cost for new depots, fleets, and waste collection infrastructure.

Some respondents express concerns about the number of recycling streams and containers that will be required for the proposed changes. Respondents suggest that some local authorities have moved away from source segregated systems, after consulting with their residents, and finding that twin stream or co-mingled systems produce higher capture rates. Some respondents express concerns that moving back to source

segregated collections will have a negative effect or suggest that the container and material requirements for the proposed changes are too complex.

Some respondents express concerns about the additional staffing costs that will result from the proposed changes. Respondents express concerns that additional staff will be required to support collections, assessments, communications projects, and to produce statistics on the scheme. Some respondents make estimations of how many additional staff would be required for local authorities or waste collection partnerships, and other respondents make estimations of the salaries required for each additional staff member.

Some respondents express concerns about whether the cost burden of moving away from co-mingled collection and onto the proposed changes would be covered by Extended Producer Responsibility or new burdens funding. In relation to familiarisation costs, respondents express concerns about the effect of implementing the proposed changes on capital and revenue.

Some respondents express concerns about the resource requirements need for houses of multiple occupation, flats, and communal properties to move them over to the proposed policy changes. Respondents express concerns about these types of premises because of the additional support they will require to address issues related to space, participation, and contamination.

Some respondents express concerns about limited space and storage which could make the proposals difficult to implement. Some respondents express concerns that this might impact on planning considerations for new developments. Other respondents express concerns that if space limitations require boxes or bags to be used, there will be an increased risk of litter.

Some respondents express concerns that the consultation lacks appreciation for the current restrictions and difficulties for collection, sorting, and processing infrastructure. Some respondents express concern about the complexity of waste streams, and others express a concern about the ability to deliver infrastructure with all necessary planning consents in a short space of time.

A few respondents express concerns with the implementation time for the proposed changes. Some respondents suggest that the current timeframe of 2023 does not take account for project planning and contract negotiations. Other respondents express concern about how long it will take for stakeholders to familiarise themselves with the proposed changes, with some respondents stating that there will need to be an adjustment period for households and businesses to understand the proposed changes, before being expected to use the new system.

Suggestions

Some respondents suggest that early and ongoing communication with households and businesses will be important when it comes to enabling the right behaviours and ensuring the effectiveness of the proposed changes. Respondents make varied suggestions about how to communicate these changes, for example: using leaflets, colour coded bins that are consistent across the nations, educating children in schools, door knocking, newspaper advertising. Respondents also suggest that communication will need to be ongoing.

Some respondents suggest that household collection services could be opened up to include small/micro business waste. Respondents suggest that this would bring down non-household Extended Producer Responsibility costs, resulting in a more realistic figure than the £1.5 billion stated in the consultation. A few respondents suggest that this would reduce familiarisation costs, as workers use the same recycling systems as at home.

Some respondents suggest that further consultation and assessments are needed to determine familiarisation costs and ongoing costs to households and businesses.

Respondents suggest that further consultation is needed on:

- enforcement;
- what types of business support would be most helpful;
- technology provision requirements for metal packaging and food and drink cartons;
- how to mitigate new burdens costs for local authorities; and
- the impact of the deposit return scheme on kerbside schemes.

A few respondents suggest that Government could make use of volunteers and community groups to support households and businesses with the changes proposed in the consultation.

A few respondents suggest that local authorities are provided the necessary infrastructure to carry out the changes proposed in the consultation. Respondents suggest that some local authorities are currently unable to collect metal products, such as aluminium foil and aerosol containers.

29.2. Question 79

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

This question was answered by 382 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns, or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
Concerns Lack of detail / clarity / data in assessment	14%	0%	44%	0%	3%	14%
Concerns Funding / financial cost	13%	1%	38%	0%	16%	11%

Concerns Food / garden waste impacts	13%	0%	40%	0%	0%	3%
Concerns Covid-19 impacts	11%	0%	36%	0%	0%	3%
Concerns Dry recycling	9%	0%	30%	0%	0%	0%

Support

Some respondents express general support for the impact assessment, on the basis that the proposed changes will result in more recycling. Some respondents point out that there is a climate emergency, or that one or more of the proposed changes will result in increased recycling uptake, or better quality recyclate.

Concerns

Many respondents express concerns that the impact assessment overlooks both existing and potential costs of operating waste management services therefore underestimating the burdens that local authorities will face from the proposed changes. Respondents identify the costs associated with:

- undertaking written assessments;
- producing research and evidence for written assessments;
- associated with potential judicial challenges, and
- securing full funding for new burdens.

Many respondents express concerns about a lack of clarity on the funding and financial costs of implementing the proposed changes in the impact assessment. For example, respondents suggest that the impact assessment may not demonstrate that the extra costs of source separated collections makes the proposed changes worthwhile. Others concerns related to funding are:

- local authorities cannot rely on a promise of funding against the context of a decade of funding cuts; and
- savings are intangible when cost reductions are likely to be cancelled about by increases in council tax if funding is not sufficient.

Many respondents express concerns that the impacts on savings from implementing a separate food waste collection and a free garden waste service may have been overstated in the consultation.

- In relation to garden waste, respondents suggest that chargeable garden waste collection services produce lower carbon impacts than free garden waste collections services, and also express concern that introducing a free service disregards the 'polluter pays' principle.
- In relation to food waste, respondents express concern with the proposed end of subsidy schemes which support anaerobic digestion plants, and with the impact assessments assumption that gate fees will remain at current levels.

Many respondents express concerns that the impact assessment fails to include a carbon assessment for dry recycling. Respondents suggest that if carbon savings are considered to be a key driver, then assessments on carbon savings should occur across all material

streams, not just for a free garden waste collection service.

Many respondents express concerns about the data used in the impact assessment and the level of clarity provided in relation to the assessment. Specifically, respondents highlight:

- potentially out-of-date data being used;
- lack of explanation or accompanying text for data;
- lack of clarity about the financial modelling,
- the fact that 'quality' is not defined,
- that there is no explanation of how 'net' will be arrived at; and
- that the assessment is too high level.

Many respondents express concerns that the impact assessment is presented in isolation and fails to take appropriate consideration of the impacts of Extended Producer Responsibility and deposit return scheme reforms. Respondents suggest that there is an interplay between all three consultations, which has not been fully explored. A few respondents suggest that the impact assessment's assumption of the net positive value of the Consistency in Household and Business Recycling proposals rely on income from Extended Producer Responsibility, and to a lesser extent, the deposit return scheme.

Many respondents express concerns that the impact assessment fails to account for the impact of the Covid-19 pandemic. Respondents suggest that the Covid-19 pandemic has resulted in major, and potentially long-lasting, changes to the waste that households and businesses produce which reduces the relevance of the modelling in the impact assessment. Some respondents suggest that the Covid-19 pandemic has also impacted collection and treatment operations, with local authorities collecting significantly more material over the last 12 months.

Some respondents express concerns that the impact assessment underestimates the power and potential influence of public opinion were they not to buy-in to the proposed changes. Respondents suggest that residents are the start of the supply chain, and that they respond best to services which are easy to use, and that they believe best fit their local circumstances. Some respondents express a concern about whether materials sent to sorting facilities under the proposed changes would be of the required standard and express a concern about rejection rates.

Some respondents express concerns about the ability to deliver the proposed changes in rural and geographically challenging locations. Other respondents suggest that large fleet sizes could cope well in rural locations, but not in urban locations because of the noise, traffic and health and safety considerations for collection crews. Respondents express a concern about the applicability of the benchmarking data, used within the consultation, for rural locations.

Some respondents express concerns that the impact assessment lacks appreciation for the current restrictions and difficulties for collection, sorting, and processing infrastructure. For example, respondents suggest that the impact assessment fails to consider the ability to procure and service larger fleets, procurement bottlenecks, treatment capacity, planning and permitting processes, and the lead time for infrastructure.

Some respondents express a concern with the assumption that the proposed changes will

result in greater recycling rates. Respondents suggest that there is no correlation between the highest performing local authorities and source separated collections, and that co-mingled collections have consistently produced high quantities of quality recycle.

Some respondents express concern with impact assessments consideration of carbon impacts. Some respondents express concern about the validity of the carbon savings stated in the consultation, while other respondents express concerns about a lack of consideration for the number additional collection vehicles that will be required for each proposed option, and the carbon impact they will have.

A few respondents express concerns about the number of recycling streams and containers that will be required for the proposed changes. Respondents also suggest that there will be a number of practical challenges associated with the storage of containers, inside the properties of householders and outside on the street scene.

A few respondents express concerns about whether the impact assessment has fully considered various staffing requirements and challenges associated with delivering the proposals. Specifically, respondents identify:

- a national shortage of drivers;
- the fact that businesses are starting from a low knowledge base; and
- the extra risks assessments and procedural training staff will require;
- the lack of staff available for local authorities to undertake assessments and renegotiate contracts.

A few respondents express concerns about whether the impact assessment has considered if the proposed changes are fair to all households and businesses. For example, respondents suggest that those without gardens should not subsidise garden waste collections, that accountability is ignored in the proposals, and that the assumption of there being 'savings' may result in reduced central support to local authorities.

Many respondents also comment that the impact assessment appears to make assumptions about income for local authorities from Extended Producer Responsibility and the deposit return scheme, but express concerns that funding from these sources is currently still theoretical. Respondents also express concerns that this funding is not due to start until 2024, but local authorities are being urged to implement new services from October 2023, leaving a potential funding gap, potentially exacerbated by the termination of recycling credits.

Suggestions

Many respondents express a concern about automatically granting exemptions to the proposed changes under TEEP assessments. Respondents suggest that to meet Government environmental objectives exemptions needs to be a rarity, and that any exemptions which are granted should be time limited.

A few respondents suggest the proposed changes will need effective enforcement to ensure effectiveness. Some respondents suggest that local authorities will need to act against non-compliant households and businesses. Other respondents suggest that non-compliant local authorities should be fined for delayed implementation, or that local authorities should have to prove where their waste goes, to prevent it being off-shored

and discouraging recycling at home.

A few respondents make varied suggestions about other measures to improve recycling that have not been considered in the consultation. For example, product redesign, restricting residual capacity, restricting collections, banning hard to recycle containers, introducing a green tax, or including Incinerator Bottom Ash (IBA).

30. Other comments received which did not fit the structure of the consultation questionnaire

165 respondents made comments in emails which were not in response to any specific question. Their comments are summarised below.

Concerns and questions

Many respondents question how the Consistency in Household and Business Recycling proposals support or undermine aspects of the waste hierarchy principles and/or waste minimisation practices.

Many respondents express concerns about the potential financial implications of implementing the Consistency in Household and Business Recycling proposals, including for local authorities. Some respondents express concern that the financial modelling used within the proposals underestimate the cost implications.

Many respondents request clarity about what aspects of the proposals will be covered by new burdens funding. For example, will the collection of garden waste be funded via this income stream?

Many respondents raise questions and express suggestions about how the timescale, phasing and implementation of the deposit return scheme, Extended Producer Responsibility and Consistency in Household and Business Recycling proposals will work in practice. Some respondents advocate that the Extended Producer Responsibility scheme should be implemented prior to the Consistency in Household and Business Recycling proposals.

Many respondents comment on the need for effective labelling of products. Others comment on the need to align infrastructure funding for implementation of Extended Producer Responsibility and Consistency in Household and Business Recycling proposals.

Many respondents raise questions what responsibilities the Scheme Administrator should have and how their role might be impacted by Consistency in Household and Business Recycling proposals.

Many respondents express a concern that the financial modelling required to justify the proposals appears to be missing. Other respondents challenge the assumptions and/or calculations provided within the proposals. For example, some respondents express concern that the proposal for providing free garden waste collection is not supported through the environmental and/or financial information presented.

Some respondents express disagreement with the proposed standardisation of waste collection cross England. Some also question whether the proposals are an effective strategy for reducing single use plastic?

Some respondents identify both positive and negative potential environmental impacts of the Consistency in Household and Business Recycling proposals. For example, respondents express a concern about the potential negative impact that an increased number of collection vehicles could have on carbon emissions.

Some respondents express a concern about the potential disruption to businesses. Others

seek clarification about the nature and extent of the impact upon businesses and highlight the challenges that businesses already face.

A few respondents express a preference for existing recycling and/or collection arrangements and question the need to change.

A few respondents express concerns about the impact of the plastic packaging tax on businesses.

Suggestions and comments

Many respondents emphasise the importance of effective communication, education and/or publicity to ensuring good rates of compliance. Some respondents provide suggestions as to how to raise awareness about how products can be recycled and/or disposed of appropriately, for example using clear labelling of products.

Many respondents make comments about the suitability of existing vehicle fleets, sorting arrangements and Material Recovery Facilities. Other respondents comment on the capacity of stakeholders to absorb the changes proposed in the Consistency in Household and Business Recycling proposals and/or the challenges that implementation will bring; for example, the number of additional waste collection vehicles required.

Many respondents suggest that the Consistency in Household and Business Recycling proposals should not take away the ability for local authorities to decide which waste disposal collection services should be provided, following consultation between relevant stakeholders.

Some respondents explain how they believe the Consistency in Household and Business Recycling proposals will help society move towards a more circular economy and/or, provide examples of how a circular economy could operate.

Some respondents make suggestions about the role of local authorities. For example, respondents suggest that as part of the Consistency in Household and Business Recycling proposals, local authorities should have discretion as to the type and frequency of collections that they provide. Some suggest the need for Government to provide local authorities with the resources and support to implement the proposals effectively.

Some respondents suggest that Government should underwrite any financial risks associated with the implementation of the Consistency in Household and Business Recycling proposals and should consider what additional performance targets should be introduced.

Some respondents suggest that exemptions as defined within the proposals should be difficult to obtain and emphasise the importance of exemptions being applied consistently.

Some respondents comment on the difficulty in implementing Consistency in Household and Business Recycling proposals due to contractual constraints and/or advocate the need to be able to award long term contracts to support the proposals.

Some respondents highlight the importance of end markets in realising the successful implementation of the Consistency in Household and Business Recycling proposals. Others outline the challenges of identifying and securing end markets for certain materials and

the challenge of contaminated materials.

Some respondents comment on the implications of the Consistency in Household and Business Recycling proposals for staffing/skill levels. For example, respondents explain that there is a national shortage of Heavy Goods Vehicle drivers and/or advocate local authorities be given sufficient time to ensure they have the staff and skill levels they need to successfully implement the Consistency in Household and Business Recycling proposals.

A few respondents suggest that to support the effective implementation of the Consistency in Household and Business Recycling proposals local authorities will need to be able to take enforcement action where residents and/or businesses fail to comply with statutory requirements to recycle.

A few respondents make suggestions about the need for legislation and/or statutory guidance to deliver the proposals. For example, respondents suggest that the provision of caddy liners should be included within statutory guidance.

A few respondents highlight the need to consider the unique and differing needs of an area based on their geographical and residential nature and/or, outline the impact of socio-economic factors upon the implementation of Consistency in Household and Business Recycling proposals.

A few respondents suggest the need for the appointment of a specialist regulator to monitor waste disposal issues. Others suggest the need to adopt an evaluative process following the implementation of the proposals.

Appendix

The following organisations responded to the consultation (this list does not include any organisations which asked for confidentiality or any respondents which gave an organisation name but described themselves as an individual).

360 Environmental Ltd
ALDI Stores Ltd
Alliance for Beverage Cartons and the Environment (ACE UK)
ALPLA UK Ltd. part of the ALPLA Global packaging company.
Alupro
AM FRESH Group UK
Amey Waste Treatment
Apple Vending and Catering Services Ltd
Ardagh Group
Asda
Ashfield District Council
Ashford Borough Council
Association of Directors of Environment, Economy, Planning and Transportation (ADEPT)
Association of London Cleansing Officers (ALCO)
AVA: The Vending & Automated Retail Association
Babergh District Council Mid Suffolk District Council
Barnsley Metropolitan Borough Council
Barrow Borough Council
BASF plc
Basildon Borough Council
Basingstoke and Deane Borough Council

Bassetlaw District Council
BCP Council
Bedford Borough Council
Benders Paper Cups
Bericap UK Ltd
Berry BPI Group
Biffa Waste Services Ltd
Biogen UK Ltd
Biowise Limited (trading as Wastewise)
Birmingham City Council (BCC)
Birmingham Friends of the Earth
Blaby District Council
Bolsover District Council
Bolton Council
Borough Council of King's Lynn & West Norfolk
Borough of Broxbourne
BPIF Cartons
Bracknell Forest Council
Braintree District Council
Breckland Council
Brentwood Borough Council
Brighton and Hove City Council
Bristol City Council
British Aerosol Manufacturers' Association
British Coffee Association

British Frozen Food Federation
British Glass
British Plastics Federation
British Retail Consortium
British Retail Consortium (BRC)
British Soft Drinks Association
Broadland District Council
Broderick Group Ltd
Bromsgrove District Council
Buckinghamshire Council
Burnley Council
Cafe Connections Ltd
Cambridgeshire County Council - RECAP Waste Management Partnership
Canned Food UK
Canterbury City Council
Carlisle City Council
Cast Metals Federation
Cedo Ltd
CEFLEX
Celebration Packaging Limited
Celebration Packaging Ltd
Central Bedfordshire Council
Charlie Trousdell Associates
Charnwood Borough Council
Charpak Ltd

Chas Storer Ltd
Chelmsford City Council
Cheshire East Council
Chesterfield Borough Council
Chichester District Council (CDC)
Chorley Council
Circularity Solutions Limited
City of London Corporation
City of Wakefield Council
City of Wolverhampton Council
City of York Council
Climate Action Stokesley and Villages
Coca-Cola Europacific Partners
Coda Group
Coinadrink Ltd
Collingham Green Vision supported by Collingham Parish Council
Complete Refreshment Solutions
Compliance Link
Comply Direct Ltd
Confederation of Paper Industries
Coveris
Craven District Council
Cromwell Polythene Ltd
Crown Packaging Europe
Cumbria Strategic Waste Partnership

D G Payne Ltd t/as Vending Enterprises
Dairy UK
Danone UK and Ireland
Dartford Borough Council
Dempson Ltd
Derbyshire County Council
Devon Authorities Strategic Waste Committee
Devon County Council (DCC)
Doncaster Council
Dorset Council
Dow UK Ltd.
Dudley MBC
East Cambridgeshire District Council
East Devon District Council (EDDC)
East Herts Council and North Hertfordshire District Council
East London Waste Authority (ELWA)
East Riding of Yorkshire Council waste and disposal team
East Staffordshire Borough Council
East Suffolk Council
East Sussex County Council
East Sussex Joint Waste Partnership
Ecosurety
Electricity North West Limited
Elopak UK Limited
Emballator UK Ltd

Emerson UK Ltd T/A InSinkErator
Environmental Packaging Solutions
Environmental Services Association
Epsom and Ewell Borough Council
Essex County Council
Essity UK Ltd.
European Vending & Coffee Service Association (EVA)
Evergreen Garden Care (UK) Ltd
EVOCA UK Ltd
F&R Cawley LTD
Fareham Borough Council
FCC Environment
Fenland District Council
First Mile
Food and Drink Federation
Foodservice Equipment Association
Foodservice Packaging Association
Friends of the earth
Frith Resource Management Limited
G R Lane Health Products Ltd
Gatchell Oaks Residents Association
Gloucestershire Resources and Waste Partnership
GMA Uk and Substrate Associates Ltd
Go-Pak
Go-Pak UK Ltd

Gosport Borough Council
Gravesham Borough Council
Greater Manchester Combined Authority
Greening Steyning
Grundon Waste Management
GS1 UK
Guildford Borough Council
Hambleton District Council
Hampshire County Council
Harborough District Council
Haringey Labour Climate Action (HLCA)
Harrogate Borough Council
Hartlepool Borough Council
Haven Court (Wiltshire Road) Residents Co Ltd
Haverhill Town Council
Herefordshire Council
Herstmere Borough Council
Hertfordshire County Council (HCC)
Hertfordshire Waste Partnership
Hinckley and Bosworth Borough Council
Horsham District Council
Hotel Chocolat
Hull City Council
Huntingdonshire District Council
Industry Council for Packaging and the Environment - INCPEN

Inglehurst Foods Ltd
innocent drinks
Ipswich Borough Council (IBC)
Islington Council
James Cropper plc
Joint Waste Solutions
Jordanglia Ltd
Keenan Recycling
Kellogg's Pringles
Kirklees Council
Klockner Pentaplast
LARAC (The Local Authority Recycling Advisory Committee)
Lavazza Professional
Leicestershire County Council (LCC)
Lewes and Eastbourne councils
Lewisham Council
Lincolnshire County Council
Lincolnshire Waste Partnership
Liverpool City Region Strategic Waste Management Partnership (LCRSWMP)
Local Government Association
London Borough of Barnet
London Borough of Bexley
London Borough of Bromley
London Borough of Camden
London Borough of Hackney

London Borough of Harrow Council
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Southwark
London Borough of Waltham Forest
London Borough Tower Hamlets
London Councils Transport and Environment Committee (TEC) and London Environment Director's Network (LEDNet)
London Forum of Amenity and Civic Societies
Maldon District Council
Malvern Hills District Council
Manchester City Council
Manchester Friends of the Earth
Mansfield District Council
Mars UK
Medway Council
Merseyside Recycling and Waste Authority (MRWA)
Metal Packaging Manufacturers Association (MPMA)
METALS DIRECT LTD.
Mid Devon District Council
MKD32
Mole Valley District Council
Monksleigh Ltd
Montagu Group
MPMA

National Association of Waste Disposal Officers (NAWDO)
National Farmers' Union (England & Wales)
National Trust
Nestlé UK&I
New Forest District Council - Hampshire
Newcastle - under - Lyme Borough Council
Newcastle City Council
Newport Recycling Limited
Nipak
Norfolk County Council
Norfolk Waste Partnership
North Devon Council
North East Derbyshire District Council
North London Waste Authority (NLWA)
North Norfolk District Council
North Northamptonshire Council
North Somerset Council
North Tyneside Council
North West Leicestershire District Council
North Yorkshire County Council
Nottinghamshire County Council
Novamont SpA
Novelis UK Ltd
Nuneaton and Bedworth Borough Council
Ocado Retail

One Bin to Rule Them All project, University of Manchester
OPRL Ltd
Oxford Direct Services (ODS)
Oxfordshire County Council
Oxfordshire Resources & Waste Partnership (ORWP)
Paperpak Ltd
Park Road (Beresford Court) Management Limited
Paul Wykes
Pendle Council
Plymouth City Council
Polytag
Portsmouth City Council
Potato Processors Associated LTD
Preston City Council
Princes Limited
Project Integra
RCGCM Ltd
Reading Borough Council
RECOUP
Recycle Wales
Redcar and Cleveland Borough Council
Redditch Borough Council
Refreshment Systems Limited
Refreshment Systems Ltd
Regalzone LLP

Regen Waste Limited
Reigate & Banstead Borough Council
ReLondon (previously the London Waste and Recycling Board)
ReNew ELP
Ribble Valley Borough Council
Richmond Council
Riverdale Paper PLC
Robinson Packaging
Rother District Council
Rotherham Borough Council
Royal Borough of Kensington and Chelsea Council
Royal Borough of Windsor and Maidenhead
Rugby Borough Council
Runnymede Borough Council
Rushcliffe Borough Council
Rushmoor Borough council
Ryedale District Council
Sacks Consulting
Scotch Whisky Association
SE Compass Environment Research and Action Group
Selby District Council
Selecta UK Limited
Severn Trent Green Power
Sharpak Aylesham Ltd
Sheffield City Council

Smart Comply Ltd
Solent University
Solihull Metropolitan Borough Council (SMBC)
Somerset Waste Partnership
Sonoco
South Gloucestershire Council
South Hams District Council
South Kesteven District Council
South Lakeland District Council
South Norfolk Council
South Norfolk Council
South Ribble Borough Council
South Tyne and Wear Waste Management Partnership
Southampton City Council
Sovereign Partners Ltd
Speira
St Helens Council
St John's Packaging (UK) Limited
Stafford Borough Council
Staffordshire Waste Partnership
Stevenage Borough Council (SBC)
Stockton Borough Council
Stoke-on-Trent City Council
Suffolk County Council
Surrey County Council

Surrey Environment Partnership
Swale Borough Council
SWS Compak
Teignbridge District Council
Tendring District Council
Tewkesbury Borough Council
The Anaerobic Digestion and Bioresources Association
The Association for Renewable Energy and Clean Technology (REA)
The Consortium of In-Vessel Composting Operators (CIVCO)
The Co-operative Group
The Federation of Private Residents Association Limited
The Institute of Workplace and Facilities Management
The Kent Resource Partnership
The London Borough of Havering
THE PACKAGING FEDERATION
The Recycling Association
The Suffolk Waste Partnership (SWP)
The West Sussex Waste Partnership (WSWP)
The Wine and Spirit Trade Association
Three Rivers District Council (TRDC)
TIPA
ToddPack
Tonbridge & Malling Borough Council
Torbay Council
Trivium Packaging

UCL Plastic Waste Innovation Hub
Unilever UK & Ireland
United Resource Operators Consortium (UROC)
University of Southampton, Estates and Facilities
URM UK Ltd
Valpak
Vegware
Veolia
Viridor Limited
Walgreens Boots Alliance
Warrington Borough council
Warwickshire Waste Partnership
Waste Expert Limited t/a WasteQuoteSupermarket.com
Wastepack EA
Wastepack NI
Wastepack SEPA
Watford Borough Council
Waverley Borough Council
Wealden District Council
Welwyn Hatfield Council
Wessex Water
West Devon Borough Council
West Lindsey District Council
West London Waste Authority (WLWA)
West Northamptonshire Council

West Suffolk Council
West Sussex County Council (WSCC)
Western Riverside Waste Authority
Westminster City Council
Wigan Council
Wm Say & Co Ltd
Wokingham Borough Council
Wolseley UK Ltd
Worcester City Council
Worcestershire County Council
WRAP (the Waste & Resources Action Programme)
Wychavon District Council
Wyre Council
Zero waste action group Godalming