#### **APPENDIX 2**

# Consistency in recycling collections in England: executive summary and government response – July 2019

The consultation on Consistency in Household and Business Recycling Collections in England closed on 13 May 2019. There were a total of 1,713 responses to the consultation. The respondents belonged to the following groups: local authorities; individuals; businesses; business representatives'/trade bodies; retailers; waste management companies; packaging producers; produce manufactures; charities and social enterprisers; consultancies; academic researchers; and those who did not categorise themselves or chose other.

**3.1 Part 1:** Measures to improve the quantity and quality of household recycling collected by local authorities

**Consultation Proposal 1:** All local authorities should be required to collect a core set of dry recyclable materials at kerbside from houses and flats

Proposal 1 from the consultation was overwhelmingly supported by both individuals and stakeholders. The vast majority of respondents also agreed that all local authorities should collect the core set of 6 types of dry materials, including plastic pots tubs and trays. Respondents expressed a range of views on the challenges of delivering this service to all households. Rural areas, flats and dense urban areas were highlighted as particularly challenging.

Given the strong support for greater consistency, the government will seek to amend legislation to require all English local authorities to collect at least the following dry materials from 2023:

- glass bottles and containers including drinks bottles, condiment bottles, jars
- paper and card including newspaper, cardboard packaging, writing paper
- plastic bottles including clear drinks containers, HDPE (milk containers), detergent, shampoo and cleaning products
- plastic pots tubs and trays
- steel and aluminum tins and cans

Government will consider carefully how this steer will interact with government proposals for a deposit return scheme, as a complementary way of driving up increased recycling rates for some specific material types.

Consultation proposal 4: All English local authorities to provide kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners.

80% of individual respondents and 72% of stakeholder responses (including 68% of local authorities who responded) agreed that there should be at least a weekly collection of food waste. 64% of individual respondents and 61% of stakeholders who responded agreed that food waste should be separately collected from garden waste.

Whilst a majority of local authorities also supported this view, a significant minority supported the option of mixed food and garden waste collections. 66% of individuals and 56% of stakeholders agreed that free caddy liners should be provided to householders.

There were a significant number of local authorities and waste management companies that were of the view that there were circumstances where it would not be practical to provide a separate food waste collection. Many respondents, in both individual and stakeholder categories, cited flats and densely urban areas as particularly problematic for food waste collections. Stakeholders also cited the need for suitable infrastructure for collection of additional food waste and also for its treatment (e.g. anaerobic digestion capacity).

Given the support for separate food waste collection, government will legislate to ensure that every local authority provides householders with a separate food waste collection. Government's preference is that this should be a separate weekly collection of food waste and not mixed with garden waste. However, it is clear that further consideration is needed with respect to local circumstances. The government will therefore give further consideration to the costs and benefits of providing free caddy liners as a standard for food waste collections.

#### **Consultation proposal 5**

This asked questions about the support that local authorities would need to deliver weekly food waste collections. There was interest in a broad range of support including financial, communications, contractual and technical. Government will take these comments into consideration as they develop the next steps of these proposals and as we prepare for implementation of changes to achieve greater consistency in recycling collections.

### **Consultation proposal 6**

This suggested that authorities currently using in vessel compositing to process mixed food and garden waste should have separate food waste collections but be able to mix the food waste with garden waste at kerbside (for example, collected together in the same vehicle) or at a later stage to allow continued use of in vessel composting treatment. Views on this were relatively balanced. However, the most significant concern raised was that separate collection of food waste only to be mixed later might undermine public confidence in recycling and in efforts to separate the food waste when it could have been collected mixed with garden waste. Government will give further consideration to arrangements for food waste collection in these circumstances.

**Consultation proposal 7** collection of garden waste: Whether households generating garden waste should be provided with access to a free collection service with a minimum fortnightly collection of 240 litre capacity.

80% of individuals agreed with the proposals for a free garden waste collection for households with gardens. By comparison, only 38% of stakeholders agreed with this proposal, including only 20% of local authorities. The most common concern raised by local authorities and others was the financial implications of providing a free service and the potential loss of income this might represent. Some respondents also commented that a free garden waste collection could mean that those without gardens were supporting a subsidised service for those with gardens.

With respect to the details of service provision, the majority of respondents agreed that the service should be fortnightly with a capacity of 240 litres and with further garden waste collections above that amount being chargeable.

Garden waste contributes significantly towards progress on meeting weight-based recycling targets. It is also important from an environmental perspective that this material is recycled or home composted, rather than sent to recovery or landfill. Whilst government retains the view that a free collection would be the most effective way of ensuring this, it is noted that stakeholder respondents were generally not supportive, with particular opposition from local

authorities. Government will therefore give further consideration to the costs and benefits of this measures, before making a final decision on whether garden waste collections should be free of charge, or whether charging should be a matter for local decision making.

#### Consultation proposal 8: measures to promote separate collection of dry materials.

70% of individuals agreed with proposals to promote separate collection of materials where this was necessary to achieve high quality. Just under half of stakeholders supported changes in current arrangements. Only 23% of local authorities supported the proposal on separate collection, while the majority of all other stakeholder groups, including waste management companies, were in favour of the proposal. Arguments against changing current arrangements focused on lack of space for containers especially in heavily urban areas and houses of multiple occupancy (HMOs). Some respondents also highlighted the costs of introducing separate collection being a barrier and some highlighted reports and studies on musculoskeletal risks from lifting and carrying in multi stream systems. Some respondents also commented on the lack of clear guidance. Some evidence was provided to support these concerns and we will review this as part of developing the next steps proposals.

Government continues to support separate collection of dry materials as the default to achieve high quality recycling in particular separating glass and fibres. However, Government recognises that in some circumstances, separate collection is not necessary to achieve high quality or is not technically, economically or environmentally practicable (TEEP). Moreover, as proposals on reforming the UK packaging producer responsibility system develop producers will be increasingly concerned to ensure quality in materials collected for recycling.

Government will work with the sector to ensure suitable guidance is provided on the application of separate collection provisions to achieve high quality recycling. This will include consideration of requirements related to the collection of packaging waste arising from our proposals for packaging extended producer responsibility. Government will also work with the Environment Agency and local authorities to monitor the effectiveness of this guidance in driving high quality recycling.

#### 3.1.3. Standardised collection

#### Consultation proposal 9: bin colour standardisation

This sought views on England moving to standardised colours for waste containers for different material streams. There was strong support for this proposal from individuals, but less support from stakeholders, with less than half overall showing support for moving to standardised bin colours and just 30% local authorities supporting the proposal. Where there was support for this proposal, it was generally suggested that changes should be phased in (either as contracts allowed for or as containers were replaced). The costs of changing to standardised colours were highlighted as a particular concern. A range of options were discussed to reduce costs, including stickers and numbering systems.

Whilst there are clear benefits to having standardised bin colours and there is support for this, it is also clear that there are practical concerns about implementation and whether this should be mandated or not. Government will give this further consideration as we develop the next steps on consistency.

Consultation proposal 10 statutory guidance on minimum service standards for recycling

There was strong support for having statutory guidance on service standards in recycling. This was supported by over 90% of individuals and 70% of stakeholders. 54% of local authorities also agreed with this proposal.

A wide range of comments were made on the content of guidance and the approach to review. Many comments highlighted the need for some local flexibility to take account of local circumstances, as well as the need for guidance to be set out best practice and encourage waste collectors to drive innovation and improvement in service delivery. Proposal 10 also suggested that the statutory guidance should set a minimum service standard for residual waste collection of at least alternative weekly. 77% of individuals agreed with this approach, whereas only 43% of stakeholders supported this approach with local authorities strongly opposed.

Given the overall support for proposal 10, government will work with local authorities and other stakeholders to prepare statutory guidance on minimum service standards for waste and recycling.

## Consultation proposals 11 – 13 communications and end markets

Proposals 11 to 13 covered measures to improve communications on recycling. This included commitments to continue working with Recycle Now, and to improve information on end destination of recycled materials. Unsurprisingly, there was strong support for improving and increasing communications, particularly on greater transparency for end destination of recycling. Funding, in particular, was seen as an important requirement to enable effective communications. This, alongside national and local communications campaigns and clear on-pack labelling were all seen as important. This supports views expressed in the parallel consultation on reforming the UK packaging producer responsibility system where there was strong support from respondents for a mandatory obligation on producers to label their packaging as recyclable or not recyclable. There was also strong support for using producer fees for communications campaigns at both a national and local level.

The need to have reliable end markets for recycling was also recognised by the majority of individual and stakeholder respondents.

Through the Waste and Resources Action Programme (WRAP), government will continue to work with the sector to develop good practice on communications and, in particular, explore ways to promote transparency on the end destination of materials. A number of suggestions were offered to improve stability in end markets for recycling, including support for government investment in processing infrastructure and building reprocessing capacity in the UK. Other respondents also stated that the proposed changes to achieve greater consistency would go a long way to improve investor confidence in recycling.

**Consultation proposal 14** introducing non-binding performance indicators for local authority waste management

#### **Consultation proposal 15** alternatives to weight based metrics

Over 60% of individuals and stakeholder responses were in favour of the development of non-binding performance indicators. 60% of local authorities also supported this proposal.

There was also support for having indicators based around yield for different material streams and for residual waste and there was general support for this approach as well. Government will work with local authorities on the development of these indicators and seek to trial them over the next few years, alongside taking forward other measures in this

consultation. In particular, given government also intend to reform the UK packaging producer responsibility system for packaging, as government will work to ensure that the metrics devised will also support the efficient functioning of that system wherever appropriate.

70% of stakeholder respondents supported the proposal to develop alternatives to weight based metrics, with slightly fewer agreeing that these should ideally sit alongside current measures of recycling. Individuals were also supportive of this approach; however, many did not express an opinion. A number of alternative metrics were proposed and government will consider these further as we develop metrics for this area.

**Consultation proposal 16** support for greater collaboration and partnership working between authorities.

This proposal was broadly supported by stakeholders and individuals alike. There was general support for having greater collaboration and partnership working between local authorities. Respondents identified a range of barriers that might prevent collaboration including local political differences; lack of alignment on policies or contractual arrangements and timescales and also an absence of clear incentives. Some also identified legal and practical barriers, such as topography and demographics, as well as resources required to make partnership working effective. Suggestions were made for how government could support greater collaboration between local authorities, including government providing practical support such as tools and guidance, or facilitating space for discussion between local authorities. Issues around two-tier arrangements were also discussed and suggestions made to review the recycling credits scheme.

Government has already committed to reviewing the recycling credit scheme and will take this forward alongside reforms to the UK packaging producer responsibility system and funding arrangements arising from that. Government will review comments made on partnership working in more detail and take this forward with local authorities and other bodies, such as WRAP and the Local Government Association (LGA).