

## Consultation on consistency in household and business recycling collections in England

### Introduction

1. What is your name? **Torbay Council**
  2. What is your email address? **Waste&recycling@torbay.gov.uk**
  3. Which best describes you? **Local Authority**
  4. If you are responding on behalf of an organisation, what is its name? **Torbay Council**
  5. Would you like your response to be confidential? **No**
- If you answered 'Yes' above, please give your reason:

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

#### Proposal 1

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

Q5 Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

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

Disagree – local authorities should not be required, to collect a core set of materials

Not sure/don't have an opinion

The core set of materials must be based on a comprehensive sorting and end market infrastructure (including exports) being available. If this is not the case for a material it should not form part of the core set. For example, it is debatable if this exists for pots tubs and trays at present and it is likely that material collected for recycling in good faith is not recycled due to these sorting and end market issues.

Q6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

**Agree**

Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

Torbay Council currently collects the proposed core set of materials and our contractor TOR2 has not had problems finding reprocessors for them. However, if more local authorities were to collect the core materials, this might result in over-supply of materials and result in uncertainty within the market and potentially, reduced rates of income or even an inability to secure an end destination for some materials.

Q7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

The same materials can be collected, although collection arrangements may differ. HMO's and flats take a disproportionate amount of time and resources to manage and collect from, for less gain in terms of the amount of waste that is collected for recycling.

Space for storage of can be an issue with flats and HMO's. In Torbay, sometimes the collection frequency has to be adjusted to compensate for a lack of storage space. In some cases we are only able to offer recycling collections for a more limited range of materials, due to a lack of storage and space. A comingled recycling collection is offered to some flats and HMO's in Torbay, where space is limited and in some cases the collection frequency needs to be increased for the same reason.

Torbay Council's Waste Team feed into the planning process. When a planning application for a block of flats is received we ensure that adequate space is provided to enable residents to separate their waste for recycling and that the collection of waste and recycling is facilitated by the developer.

Where recycling is collected from flats and HMO's, the level of contamination is higher than when collecting from individual households.

Additional resource needs to be put into establishing relationships with property management / housing associations at the sites and to ensure that owners / management companies take responsibility for ensuring that the recycling is presented for collection as required. It is possible that this might require some further legislation.

WRAP have done research on the best ways to manage waste and increase recycling from these properties and have issued guidance to local authorities, however going forward stronger policies are required to be put in place to ensure suitable storage for containers is allocated at flats and HMO's

Q8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

Any requirement to separate materials at collection should not apply to flats and HMO's if storage space is an issue.

Storage issues could be addressed by stricter National Planning Policy, specifying minimum design requirements to allow for waste to be separated and stored within dwellings and waste compounds and easy access. However, this will not improve some of the issues faced at older flats and HMO's.

Due to a high number of residents within flats and HMO's being transient, regular engagement and communications are needed. Additionally, engagement with landlords and management companies are required.

Q9 Do you have any other comments to make about Proposal 1? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

There will still be confusion for members of the public between one area and another as some local authorities will collect more than the core set of materials, which is the case for Torbay Council. It would be a backwards step to stop collecting some materials at the kerbside if it has been done in the past.

## Proposal 2

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

Q10 Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	✓		
Paper and card	✓		
Plastic bottles	✓		
Plastic pots tubs and trays	✓		
Steel and aluminium tins and cans	✓		

Q11 What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?

	This should be included in the core set from the start of Consistency	This should be included from the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	✓			
Plastic bags and film			✓	
Other materials (please specify)				✓

Q12 If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.

Plastic bags are a difficult material to recycle. There are a limited number of reprocessors and end markets. The material income is also low. Plastic bags and film can be particularly challenging as compostable bags are becoming more widespread and many MRFs cannot sort plastic bags/film. Even where a recycling opportunity exists for these materials they are not readily identified as different materials by the resident and if not appropriately labelled have the potential to contaminate the waste streams.

Q13 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

We would need to be satisfied that viable markets exist for any additional materials and that funding is allocated to reimburse local authorities for any additional capital and revenue costs that they would incur.

Q14 Do you have any other comments to make about Proposal 2?

Encouraging investment in local reprocessing infrastructure links with the aspirations of the Circular Economy Package and will be essential. Reassurance is required that there will be enough confidence in the recycling market within the South-West, for businesses to develop and expand to meet local demands. This includes the sorting infrastructure as this can sometimes be a barrier to viable end markets.

### Proposal 3

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

Q15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

Yes

No

Not sure/don't have an opinion

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

Yes – but I would also add some (please specify which conditions you believe should be added ...)

No – some/all should be removed (if some please specify below)

No – some should be added and some should be removed (please specify which ...)

Not sure/don't have an opinion

Torbay Council would like to see a greater emphasis on reliable, long-term end markets for materials within the South-West. The cost of bulking and haulage of recycling needs to be considered if markets are not available locally.

Q17 Do you have any other comments to make about Proposal 3?

N/A

**Proposal 4**

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

Q18 Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	✓		
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	✓		
(iii) services to be changed only as and when contracts allow	✓		
(iv) providing free caddy liners to householders for food waste collections		✓	

Q19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

Yes (if yes please provide further details below)

No

Not sure/don't have an opinion

It would not be practical to provide a separate food waste collection where space is limited. Additionally, where flats and properties share communal waste and recycling facilities there is a high possibility the food waste will become contaminated. This is due to lack of ownership and responsibility of these bins.

Collection methods can also influence the practicability of separate food waste collections, for example in very rural areas and districts. Collection vehicles would have to drive long distances to collect just food waste if current vehicles do not have the configuration to collect food at the same time as recycling.

Q20 Do you have any other comments to make about Proposal 4 including on circumstances where it may not be practical to provide a separate food waste collection?

We have concerns over the proposals to provide free caddy liners, the anaerobic digestion plant that take our collected food waste prefers waste that is contained within plastic bags as they are able to separate this at the beginning of the process.

There is concern that within Devon and Cornwall there is a lack of anaerobic digestion facilities for processing food waste. Torbay already collects food waste, but is concerned that as demand for the limited number of facilities increases, with new food waste collections introduced, this will either push the facilities over capacity or drive an increase in gate fees due to increased demand. This would be exacerbated if businesses were also required to have a separate collection of food waste.

The effect that reduced residual waste arisings will have on the cost of existing residual waste treatment contracts. Torbay Council is part of the South West Devon Waste Partnership (SWDWP) which has procured a joint contract for residual waste treatment at a combined heat and power facility in Plymouth. Whilst a reduced tonnage delivered to the facility by the partners would represent an overall saving to the SWDWP, the rate per tonne paid as a gate fee would increase. The pricing of the disposal contract is based upon tonnages that were forecast by the Partnership and the suggested changes (Consistency, EPR & DRS) to local authority waste streams would significantly change these forecasts. The contract runs until 2039 and if a 12% reduction in residual waste delivered to the facility was experienced, this would equate to a saving of approximately £31 million, but as a result of increased gate fees, we would incur an additional cost of £8.4 million, resulting in a net saving of £22.6 million.

### **Proposal 5**

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

Q21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)

I am not responding on behalf of a local authority

Specific financial support (please specify)

Procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers)

Communications support, (e.g. free collateral that can be adapted and used locally)

Technical support, (e.g. free advice from a consultant about round re-profiling)

Other (please specify ...)

Money for communications where collections are established, to ensure engagement with residents is maintained and to capture the transient population.

Funding of containers, delivery and other set up costs. The cost of replacing containers.

Advice on changes required to infrastructure for example transfer station which would also impact the environmental permit.

Waste composition analysis work to be undertaken to provide data on what type and quantities of materials that are within the residual waste.

Q22 Do you have any other comments to make about Proposal 5?

Torbay Council commissioned the M.E.L Research to carry out a waste analysis of the residual waste in 2017, the finding found that although within Torbay a weekly food waste collection is provided and residual collections are fortnightly, the amount of food waste was a major component forming 22.1% of the total. This equated to 1.07kg/hh/wk.

The same analysis showed found 79.5% of the food waste in the residual waste was avoidable and 9.9% was fully packaged. Therefore, we would like to see further efforts and funding focused on the reduction of food waste.

If the provision of free caddy liners is mandated we require assurances that the cost for delivery and any administration costs will be reimbursed. Additionally the costs for new and replacement caddies need to be factored in.

Providing incentives to increase participation in recycling and waste reduction. Studies have shown food waste collections require a large initial communications campaign and then ongoing maintenance communications in order to keep participation and capture rates as high as possible.

### **Proposal 6**

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

Q23 What are your views on this proposal?

This is not applicable for Torbay as we do not have any commitments with IVC facilities.

## Proposal 7

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

Q24 Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) a free garden waste collection for all households with gardens		✓	
(ii) A capacity to 240l (bin or other container eg sack)	✓		
(iii) A fortnightly collection frequency (available at least through the growing season)	✓		
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	✓		
(v) this new requirement to start from 2023 (subject to funding and waste contracts)		✓	

Q25 Do you have any other comments to make about Proposal 7?

This proposal does not fit with the producer pays principal. Charging for garden waste encourages home composting which has less environmental consequences than kerbside collections.

Those householders without gardens will be funding those that do have a garden to have a free garden waste collection service. The ability for local authorities to charge householders for garden waste collections represent an equitable charging regime, only applying to those who wish to use the service.

Torbay has never had a regular garden waste collection service covering the whole area. Garden waste is collected and charged for on request. To introduce garden waste collection across the area would mean investment in resources, including collection vehicles. Additional staff would also be required to operate the service.



Staff (especially drivers) are difficult to find and keep and there is currently a national shortage of drivers making it very difficult to recruit and retain them.

Currently Torbay only has an ad-hoc, charged for garden waste collection and this currently generates £8.5k income which would be lost with this proposal. The main cost would be to completely set up new fortnightly rounds for free garden waste collections to about 40,000 households with gardens. The additional cost of this provision would range from £650k to £950k dependant on the tonnage collected, which would need to be included as a new burden.

Within Torbay there are companies and charities that provide services to remove householder's garden waste, if a free garden waste service was introduced these companies would be affected. They would not be able to compete against a free of charge, local authority collection.

Residents are advised that garden waste will not be collected as part of the residual waste and a scheduled bring service is provided regularly, on Sundays, in two towns that do not have a HWRC to provide more accessible drop off points for residents.

Waste compositional analysis completed in October 2017 by M.E.L Research showed the following composition of residual waste.

WASTE MATERIAL (KG/HH/WK)	TORBAY				
	ACORN 1	ACORN 3	ACORN 4	ACORN 5	AVERAGE
PAPER	0.31	0.31	0.66	0.53	0.45
CARD & CARDBOARD	0.12	0.08	0.28	0.12	0.15
PLASTIC FILM	0.24	0.19	0.45	0.33	0.30
DENSE PLASTIC	0.27	0.19	0.95	0.31	0.43
GLASS	0.17	0.09	0.15	0.09	0.12
METALS	0.11	0.10	0.36	0.16	0.18
TEXTILES	0.18	0.15	0.51	0.37	0.30
SANITARY	0.38	0.16	1.05	0.17	0.44
MISCELLANEOUS COMBUSTIBLE	0.27	0.30	0.47	0.16	0.31
MISCELLANEOUS NON-COMBUSTIBLE	0.01	0.04	0.10	0.55	0.17
GARDEN ORGANICS	0.10	0.90	1.40	0.47	0.77
KITCHEN ORGANICS	0.75	0.58	2.13	0.91	1.10
FINES	0.04	0.05	0.29	0.00	0.10
HAZARDOUS	0.00	0.00	0.01	0.02	0.01
WEEE	0.00	0.03	0.02	0.01	0.02
<b>TOTAL</b>	<b>2.95</b>	<b>3.16</b>	<b>8.85</b>	<b>4.20</b>	<b>4.84</b>

### Proposal 8

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

Q26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

Yes

No (why ...?)

## Not sure/no opinion/not applicable

Torbay Council currently provides a weekly collection of dry recycling and food waste which is collected in separate material streams. Cans and plastics are collected as a mixed stream and we would be keen to be able to continue with this practice, with mechanical sorted completed after collection.

Torbay Council would not want to see the guidance being too prescriptive and flexibility will be required to ensure that local authorities and/or their contractors are able to meet the operational challenges that are specific to their area.

Torbay Council would like to retain the flexibility to set the frequency of residual waste collection. Restriction of residual waste in terms of frequency or container size, supported by a comprehensive and frequent recycling collection. Moving to a three or four weekly residual waste collection has resulted in reduced amounts of residual waste being collected (-15% in East Devon) and the amount of material collected for recycling increase significantly. Although much resource is moved from the collection of residual waste to the collection of recycling, there are cost savings to be realised in terms of a reduced number of collections and savings on disposal costs. Material income will also increase as a result of recycling more.

Torbay Council has been considering options for residual waste collection in the future. Consultants White Young Green were commissioned to complete a study of the best potential recycling collection vehicles for Torbay and as part of this study they state that a decrease in residual waste of 14% is typical where a three weekly residual waste collection is introduced. An increase of 45% in food waste and 9% in recycling yields is typical for authorities that move to three weekly collections of residual waste. This is based upon trials completed in Somerset.

When increased levels of recycling are realised, this reduces the amount of residual waste to be collected. If weekly food waste collections are offered, this removes much of the putrescible element of that waste stream and reduces the weight and volume to be collected, meaning that less frequent collections or reduced capacity for residual waste become viable.

If further EPR was to be considered for nappies and sanitary / hygiene products, which could fund their separate collection, this would mean that the residual waste stream should be very clean and less frequent collections would become even more acceptable to the public.

Q27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.

Torbay Council currently provides a weekly collection of dry recycling and food waste which is collected in separate material streams. Cans and plastics are collected as a mixed stream and we would be keen to be able to continue with this practice, with mechanical sorted completed after collection. If we were unable to mix plastics and metals at collection this would have an impact on the type of collection vehicle used.

Torbay Council believes that the quality of the different material streams is maintained by the mechanical sorting of plastics and metals.

Limited space can pose a problem for the separate collection of materials. This is especially relevant for flats and communal housing stock, where there might not be space for enough containers to store the different material streams. For some housing stock it is not operationally viable to collect materials separately and if required to would lead to high levels of investment being required in vehicles and infrastructure.

In areas where a commingled collection is already undertaken, the local authority will have already had to prove that separate collections are not TEEP.

In Torbay, comingled collections are used to support the main kerbside sort recycling service. Flats often receive a comingled collection due to a lack of storage space and challenges with engaging residents. We would prefer that all households received the same service, but for some premises this is not possible.

Comingled collections have also been relied upon in Torbay when our contractor has experienced operational failures or performance issues and collections have run late (eg. Following snow and also due to issues with collection vehicles). Removing the need to sort the materials at the kerbside has allowed our contractor to collect recycling as quickly as possible and also to use additional compaction vehicles to assist with catching up with late collections.

Q28 Do you have any other comments to make about Proposal 8?

We would question whether this could be seen as anti-competitive as an increase in the number of local authorities collecting materials separately, would reduce reliance on existing MRFs.

Consideration of market prices for different materials will be required. It may be more cost effective to offer comingled collections in some areas and if a MRF can sort the material and achieve similar quality standards to separate collections then it would be difficult to justify separate collections based on either material quality or cost.

### **Proposal 9**

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

Q29 Do you agree or disagree with this proposal?

Agree – bin colours should be standardised for all waste streams

Agree in part – bin colours should be standardised for some waste streams but not all (specify which ...)

Disagree – bin colours should not be standardised for any waste streams

Not sure/no opinion/not applicable

Torbay Council can see the benefit that standardised container colours would offer in terms of consistency of waste and recycling collections between different areas. This would help with public understanding of waste and recycling collections and would be likely to result in higher participation and capture of recycling.

However, the cost of replacing containers is the main disadvantage to this proposal. Torbay would be keen to see a standard set of colours established which can be adopted by local authorities as and when containers are replaced.

To have the maximum benefit, the same colour coding should be used in other places where people generate waste or recycling eg. Work, school, on-the-go.

Q30 There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?

Phased approach 1 – as and when waste contracts are renewed

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

Other ways please specify...

Q31 Do you have any other comments to make about Proposal 9?

Torbay Council agrees in principal with standardised container colours, but local authorities must be able to choose type and size of containers.

The phased approach 2 is favoured as this would be seen to be the least wasteful way of changing all containers to a different colour. However we can envisage this could cause a lot of public confusion if someone has a different coloured container to their neighbours. This would make communications very difficult.

### **Proposal 10**

We are proposing to prepare statutory guidance on minimum service standards to which local authorities will be required to have regard. The detail of this guidance will be consulted upon in our second consultation

Q32 Do you agree or disagree with the proposal to publish statutory guidance?

Agree – government should publish statutory guidance

Disagree – government should not publish statutory guidance

Not sure/no opinion/not applicable

Q33 We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?

Agree

Disagree – it should be more often

Disagree – it should be less often

Not sure/no opinion/not applicable

Torbay Council does not support statutory guidance on minimum service standards, however, no firm timescale for review is stated within the consultation document.

Q34 Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week Do you agree or disagree with this proposal?

Agree

Disagree – it should be more often

Disagree – it should be less often

Not sure/no opinion/not applicable

Q35 Do you have any other comments to make about Proposal 10?

Torbay disagree with the guidance to set a minimum service standard for residual waste collections. Less frequent residual waste collections that have been adopted by local authorities have proven it drives improved participation in recycling and increased capture of target materials for recycling.

The table below shows that of the top ten performing Waste Collection Authorities, in terms of residual waste per capita (to enable waste reduction to be recognised), none of the authorities' residual waste collections are in line with the proposed minimum service standards of both collection frequency and container size for residual waste. To introduce these service standards would be a step backwards and would prevent other local authorities from achieving higher rates of recycling through restrictions on residual waste. This is also evident when comparing the performance of Welsh authorities to those within England.

Local Authority	Recycling Rate (%)	Residual Waste per capita (kg)	Residual Waste Collection Frequency	Residual Waste Container Size (litres)
<i>Stroud</i>	<i>61.2</i>	<i>114.9</i>	<i>2 weekly</i>	<i>140</i>
<i>East Devon</i>	<i>54.2</i>	<i>126.8</i>	<i>3 weekly</i>	<i>180</i>
<i>Vale of White Horse</i>	<i>60.4</i>	<i>127.6</i>	<i>2 weekly</i>	<i>180</i>
<i>Ealing</i>	<i>48.8</i>	<i>128.5</i>	<i>2 weekly</i>	<i>180</i>
<i>Surrey Heath</i>	<i>61.4</i>	<i>129.4</i>	<i>2 weekly</i>	<i>180</i>
<i>Colchester</i>	<i>54.8</i>	<i>130.9</i>	<i>2 weekly</i>	<i>180 / 3 bag limit</i>
<i>South Oxfordshire</i>	<i>63.0</i>	<i>131.9</i>	<i>2 weekly</i>	<i>180</i>
<i>Trafford</i>	<i>58.5</i>	<i>136.2</i>	<i>2 weekly</i>	<i>180</i>
<i>Three Rivers</i>	<i>62.4</i>	<i>136.5</i>	<i>2 weekly</i>	<i>140</i>
<i>Ashford</i>	<i>56.6</i>	<i>136.9</i>	<i>2 weekly</i>	<i>180</i>

We believe it should remain a local authority's choice to set the frequency of residual waste collections based on their knowledge of the local area, housing stock, demographics, local recycling facilities and infrastructure. This goes hand in hand with restrictions on container size for residual waste, which some local authorities

may find a preferable way of limiting residual waste capacity and encouraging recycling.

Torbay Council would like to retain the flexibility to set the frequency of residual waste collection. Restriction of residual waste in terms of frequency or container size, supported by a comprehensive and frequent recycling collection. Moving to a three or four weekly residual waste collection has resulted in reduced amounts of residual waste being collected (-15% in East Devon) and the amount of material collected for recycling increase significantly. Although much resource is moved from the collection of residual waste to the collection of recycling, there are cost savings to be realised in terms of a reduced number of collections and savings on disposal costs. Material income will also increase as a result of recycling more.

Torbay Council has been considering options for residual waste collection in the future. Consultants White Young Green were commissioned to complete a study of the best potential recycling collection vehicles for Torbay and as part of this study they state that a decrease in residual waste of 14% is typical where a three weekly residual waste collection is introduced. An increase of 45% in food waste and 9% in recycling yields is typical for authorities that move to three weekly collections of residual waste. This is based upon trials completed in Somerset.

When increased levels of recycling are realised, this reduces the amount of residual waste to be collected. If weekly food waste collections are offered, this removes much of the putrescible element of that waste stream and reduces the weight and volume to be collected, meaning that less frequent collections or reduced capacity for residual waste become viable.

If further EPR was to be considered for nappies and sanitary / hygiene products, which could fund their separate collection, this would mean that the residual waste stream should be very clean and less frequent collections would become even more acceptable to the public.

Less frequent residual waste collections also have the advantages of reducing the effect of vehicle emissions and congestion. Torbay is a tourist resort and in the summer there is an influx of visitors, with the population increasing by a quarter. The time taken to return to the transfer station to empty a vehicle can easily double in the summer, due to an increased number of vehicles in the road.

Statutory guidance may create inefficiency in some areas. One size does not fit all, for example, how can the Isles of Scilly and Central London be prescribed the same guidance when they are so different.

### **Proposal 11**

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

Q36 Do you have any comments to make about Proposal 11?

Torbay Council frequently uses Recycle Now resources and other tools produced by WRAP to help local authorities to communicate effectively with residents. We fully support its continuation and development.

Q37 What information do householders and members of the public need to help them recycle better?

- Clear labelling on packaging
- Door stepping and roadshows to provide face to face, targeted information.
- Service specific information leaflets.
- Website information – tailored to the local services.
- National campaigns with more general information and promotions.
- Collection calendars and Christmas collection dates.
- Signposting to further information about waste reduction / composting / real nappies etc, so that if the resident desires, they are able to manage their waste further up the waste hierarchy. This is the type of communications that has been reduced or stopped as a result of austerity and reducing budgets.

It is important that local communications are provided regularly so that people do not lose motivation with their recycling behaviours. Regularity of communications also helps to ensure that new residents and transient populations are targeted with the communications and consequently able to participate in the recycling services.

Local authorities also require greater power and clarity with regard to the point where encouragement and communication should turn to enforcement. Some residents do not engage with the communications and do not participate in the recycling services or cause issues with quality due to contamination. If residents are not prepared to engage with local authorities, in order to drive high participation levels and capture of materials, enforcement powers are required with appropriate penalties to make non-participation unfavourable.

### **Proposal 12**

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

Q38 Do you agree or disagree with this proposal?

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

Disagree – government should not work with local authorities and other stakeholders on this

Not sure/no opinion/not applicable

Q39 Do you have any other comments to make about Proposal 12?

This information is already available on WasteDataFlow. This proposal could add extra burdens on local authorities to provide information and resources are not available to do this.

The number of end destinations that Torbay Council uses for different streams of recycling is significant and it is common that several destinations might be used for the same material, over the course of a year. This will make providing this information to residents difficult to do in a meaningful way. It can also be difficult to obtain end destination information from the companies that recycling is sold to.

As part of the Devon Authorities Strategic Waste Committee, Torbay works with Resource Futures to knock on resident's doors and provide targeted advice and information about recycling and waste. In Torbay we have received feedback that with regard to information on end destinations, people are most interested to hear about how waste is treated at the Combined Heat and Power Energy from Waste facility and that they commonly express concerns about recycling being exported to China or being disposed of in landfill instead of being recycled. Leaflets were left at any properties where no-one was at home. The leaflet gave people the opportunity to request further information, including information on end destinations. 1006 leaflets were returned with requests for information or advice and of these, 72 asked for information about end destinations (7.16%).

It may be more appropriate for information to be provided at a national or regional level, which will allow for any myths to be disproven.

### **Proposal 13**

#### **End Markets**

Q40 Please use this space to briefly explain any comments you have on the issues discussed in this section.

Access to reprocessors is limited within the some areas of the UK, meaning there can be high costs associated with haulage to send materials collected to end destinations. Within the South West this is an issue. The majority of the core materials have to be hauled 100's of miles. Further investment or market intervention may be required to stimulate infrastructure development in the UK.

Stable local markets for the core materials will need to be in place before local authorities start to change their services. This helps to ensure that residents have faith in their recycling collection service and believe that the materials are actually recycled. If no market is available, the material will not be able to be recycled. Alternatively, materials prices may drop as a result of material flooding the market, with supply outweighing demand.

There is concern that within Devon and Cornwall there is a lack of anaerobic digestion facilities for processing food waste. Torbay already collects food waste, but is concerned that as demand for the limited number of facilities increases, with new food waste collections introduced, this will either push the facilities over capacity or drive an increase in gate fees due to increased demand. This would be exacerbated if businesses were also required to have a separate collection of food waste.



## Proposal 14

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

Q41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

There are a range of performance indicators available on WasteDataFlow now. Performance indicators need to add value and be realistic. The number of PI's were reduced a number of years ago to reduce the burden on local authorities, however, most can be calculated from a local authority's Waste Data Flow submission.

Torbay Council seeks clarity on how the non-binding indicators might be used by government and seeks assurance that they will not be used as a means of withholding funding.

If English local authorities are required to meet the same targets as Wales, Scotland and Northern Ireland, we have concerns that English local authorities will be disadvantaged by the proposed service standards (especially regarding residual waste) and will not be operating on a level playing field.

Q42 Do you agree or disagree that the proposed indicators are appropriate?

Agree

Disagree (please expand ...)

Not sure/no opinion/not applicable

The indicators proposed are not inappropriate, however local authorities are already reporting this information.

If further data is required, this should be viewed as a new burden to local authorities and supported accordingly.

Q43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

Current indicators in use – NI 191, NI 192, NI 193, BVPI 82a & b and BVPI 84.

### **Proposal 15**

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

Q44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

Q45 Do you agree that these alternatives should sit alongside current weight-based metrics

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

Q46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

We would agree with the proposal to consider metrics to sit alongside weight-based metrics, as it will help to prevent local authorities chasing heavier materials for performance, (e.g. garden waste) and allows for decisions about waste management to be based upon environmental benefits instead.

Yes we agree the alternatives should be alongside the current weight based metrics as these are still required for benchmarking purposes. Additionally many contracts are based on weights and will still be required to measure performance.

Potentially carbon, however, we believe that research is required to determine the lifecycle assessment and carbon impact of reusing / recycling / composting / energy recovery of different materials.

If more metrics are introduced to measure performance, any increased resources required at local authority level should be viewed as a new burden and appropriately resourced.

### **Proposal 16**

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

Q47 Do you agree that greater partnership working between authorities could lead to improved waste management and higher levels of recycling?

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

We are already in partnerships with other local authorities. South West Devon Waste Partnership was jointly set up to deal with the residual waste in South Devon, this led to the procurement of the Energy from Waste plant in Plymouth.

Torbay Council is also a member of the Devon Authorities Strategic Waste Committee, a partnership of local authorities comprising of Torbay Council, Devon County Council, East Devon District Council, Exeter City Council, Mid Devon District Council, North Devon Council, South Hams District Council, Teignbridge District Council, Torridge District Council and West Devon Borough Council. This partnership has benefitted from the letting of joint contracts for sale and bulk haulage of recycling; funding of community schemes such as furniture reuse and householder communication campaigns.

Q48 What are the key barriers to greater partnership working?

Partnerships can work well, however they are not without issues. Some of the barriers faced can include objectives not shared by all parties and political aspirations can differ between authorities, which can cause conflict. Budgetary pressures on all or some within the partnership can also be a barrier.

Contract end / renewal dates can also act as a barrier to forming more formal partnerships.

Q49 How might government help overcome these barriers?

Funding and research into the best way to establish and grow waste partnerships.

Q50 Do you have any other comments to make about Proposal 16?

N/A

## **Part 2 Measures to improve recycling by businesses and other organisations that produce municipal waste**

### **Proposal 17**

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

Q51 Do you agree or disagree that businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

Q52 Which of the 3 options do you favour?

Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling

Option 2 mixed dry recycling and separate food recycling; no glass recycling  
Option 3 mixed dry recycling, separate glass recycling, separate food recycling  
Something else (please expand ...)  
Not sure/no opinion/not applicable

If householders are expected to present their waste in this way, businesses should also do so. It means confusion between what to do at work and home is eliminated if both are separated in the same way. This will also help to reduce the levels of contamination.

The way that the consultation is worded suggested that it will be a legal requirement for businesses to recycle. We would question why this would not apply to householders and would like to reiterate our answer to question 37 regarding the need for appropriate enforcement powers, if people do not engage with communications.

Q53 We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on where this may not be practicable for technical, environmental or economic reasons  
Yes – it should be practicable to segregate waste for recycling in all circumstances  
No – some exceptions are needed for particular circumstances (please provide examples below)  
Not sure/no opinion/not applicable

Space available to segregate and present waste for collection, for example older buildings in urban areas, small concessions on beaches and in rural areas may find this a challenge.  
Some smaller businesses may not generate enough of a certain waste stream to warrant a collection of it.  
Also there could be issues with customers contaminating waste.

Q54 Should some businesses, public sector premises or other organisations be exempt from the requirement?  
Yes (which ones and why ...?)  
No  
Not sure/no opinion/not applicable

Q55 Do you have any other comments to make about Proposal 17?  
N/A

### **Proposal 18**

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

Q56 Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

Q57 Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

If all businesses are expected to recycle this should include food waste as well. It also helps to ensure consistency of behaviour between work and home, which will help to drive higher levels of recycling.

Q58 Do you have any views on how we should define 'sufficient' in terms of businesses producing 'sufficient' quantities of food waste to be deemed in scope of the regulations?

No, all businesses should be obliged to recycle food waste.

Q59 Do you have any views on how we should define 'food-producing' businesses?

Possibly those businesses that receive Environmental Health checks.

Q60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?

Yes (which ones and why ...?)

No

Not sure/no opinion/not applicable

Q61 Do you have any other comments to make about proposal 18?

Torbay Council has concerns about the capacity within anaerobic digestion facilities in Devon and Cornwall to treat increased levels of household food waste as well as increased business food waste.

### **Proposal 19**

If the proposals above are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the impact on small and micro businesses.

Q62 What are your views on the options proposed to reduced costs?

Recycling collections should be cheaper than residual waste collections, this acts as an incentive for businesses to recycle and not add a financial burden. If the disposal element of producer payments under EPR were used to subsidise recycling services to act as a further incentive for recycling. Or could be used to stimulate greater levels of recycling within these types of businesses.

Franchising waste collection services, will reduce the amount of operators in an area and mean it is more cost effective for both businesses and the waste operators.

Q63 Are there other ways to reduce the cost burden that we have overlooked?

Delivery of waste and/or recycling to waste sites or HWRC's by businesses.

Q64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

Assistance with communication and education to drive behaviour change.

### **Proposal 20**

As part of implementing consistency, we will work with waste producers and waste collectors in the non-household municipal sectors to improve reporting and data capture on 62 waste and recycling performance of businesses and other organisations. Any requirements will be subject to consultation.

Q65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

Agree

Disagree (why ...?)

Not sure/no opinion/not applicable

As a local authority we already report waste collection and disposal data.

As a large organisation this would be a burden to report, we have many buildings and use contracts to collect waste and recycling and our contractors do not report to us the weights collected. There will be an increase in costs if waste collectors will have to report this information which will be passed onto the business.

Q66 Do you have any other comment on Proposal 20?

N/A