

# Response ID ANON-JJ98-ZHY7-Q

Submitted to **Consultation on Consistency in Household and Business Recycling Collections in England**

Submitted on **2019-05-12 14:31:21**

## Introduction

### 1 Would you like your response to be confidential?

No

### 2 What is your name?

**Name:**

David Newman

### 3 What is your email address?

**Email:**

dn@bbia.org.uk

### 4 What is your organisation?

**Please provide further comments :**

business representative/trade association

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

Bio-Based and Biodegradable Industries Association (BBIA)

## Proposal 1:

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

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

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

Agree

**Please provide further comments :**

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

**what are the barriers that local authorities face when collecting recycling from flats or houses of multiple occupancy:**

WRAP has identified the following collection methods for flats as part of its guidance on the matter: (see

<http://www.wrap.org.uk/content/recycling-collections-flats-introduction> and <http://www.wrap.org.uk/content/recycling-collections-flats-food-waste-collections>)

- 'Bring' recycling schemes
- Chute recycling schemes
- Door to door collection schemes
- Collections from each floor
- Food waste collections from flats
- Flats as part of a commercial building
- Bulky waste collections from flats

While for food waste collection, the following methods are signalled:

- Bring bank collection scheme
- Door to door collection scheme
- Collection from a communal area using larger caddies

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

**Please provide further comments :**

In our view, door to door collection is the preferred method for the majority of households as it is the service provided for other types of recyclables. However, we understand communal collection or bring bank collection can be suitable for some remote areas and small businesses.

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

**Please provide further comments :**

The premise that compostable packaging does not have adequate collection infrastructure may be correct in today's scenario but if the proposals on uniform food and garden waste collection come to fruition, as is government's ambition then every household in England, and indeed the UK, will have at least one collection system for organic waste. Given that the point in time when the "core set" will become a requirement is the same point when the new collection system is intended to be operational, we urge government to consider this when considering the "core".

The market needs certainty and time to plan and introduce alternative packaging formats and materials which, in the case of compostable packaging, is provided by the government's view on organic waste. As such, the list of applications provided in our additional documentation, should be considered as part of the "core" set going forward.

Information and continual communication to users is key on this. A brochure sent through the post at the beginning of a new service will have little impact. Continual engagement with householders over long periods is needed to ensure understanding and compliance. (see how Milan does it <https://www.amsa.it/en/cittadini/milano/raccolta-differenziata>)

While in other European countries separate food waste collections from flats is normal, in the UK the recycling rate of those properties remains below houses with kerbside collection.

We also emphasise that the quality of the service provided is essential to achieve high rates of interception of food waste in flats, and this requires minimum service standards, benchmarking and monitoring of service providers' performance.

## **Proposal 2**

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

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

Should be included in the core set

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

Should be included in the core set

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

Should be included in the core set

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

Should be included in the core set

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

Should be included in the core set

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

**tick - food and drinks cartons:**

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

**tick - plastic bags and film:**

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

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

**Please provide further comments :**

In order for any item to be included in the core set, the technology for recycling the item must be proven and available at scale. Carton recycling is available at one plant in the UK however, it is uncertain what the material flows in and out of this plant actually are particularly when it comes to aluminium and plastic. Furthermore, there is little information publicly known about the energy and water intensity of the process.

With regards to plastic films, again there is little proven at scale technology in the UK, at best films / bags are recovered into waste bags or other industrial uses but only 18KT of plastic film / bags were recovered in 2017. Currently there is a lot of hype regarding to chemical recycling / pyrolysis, again there is nothing proven at scale and there are significant questions regarding these technologies.

The single largest barrier to compostable packaging deployment in specific applications in the UK is not the lack of organic recycling facilities or whether it is proven to compost but the lack of collection infrastructure which government is addressing elsewhere in this consultation.

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

**Please provide further comments :**

As compostable packaging becomes more widely adopted in specific applications further applications should be considered in time.

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

**Please provide further comments :**

Consistency is required across England so that retailers and brands can communicate to citizens where they dispose of their waste, into which bin/container. We have to consider what is effectively recyclable in the UK without depending upon exports of materials. Currently and for the foreseeable future plastic films and drink cartons are recycled at a very low level. Separate collection of these makes little sense. They should be disposed of for incineration until such a time as the infrastructure is in place in the UK to effectively recover these materials. Moreover, as they are contaminated often with food/soups/drinks, they are unsuitable for both mechanical recycling, and as they contain plastic, for organic recycling.

**Proposal 3**

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

Yes

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

Yes -but would also add some (please specify in box below)

**Please provide further comments :**

Compostable packaging as outlined in our additional submission

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

**Please provide further comments :**

The process for the periodic evaluation of materials into the core "recyclables" needs to be transparent and subject to consultation. This is to ensure that innovation is not stifled by protectionist instincts of those whose materials in the market place could be subject to competition from innovation.

**Proposal 4**

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

**tick - a least a weekly collection of food waste:**

Agree

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

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

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

Agree

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

Agree

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

Yes - please provide further details in the box below

**Please provide further comments :**

When possible the Government should be promoting waste prevention and reduction. In very rural communities this can include the promotion of home composting for food and garden waste, rendering the cost and effort of door to door/kerbside collection unnecessary. Councils should be encouraged to create mechanisms that stimulate home composting for example, by giving small reductions to the council tax. Entitled households should be monitored to ensure compliance.

However, in general and for the vast majority of households there are no reasons why door to door or kerbside collections of food or commingled food and garden waste cannot be undertaken.

This is recognised in the recent reform of the EU Waste Framework Directive (<http://data.consilium.europa.eu/doc/document/PE-11-2018-INIT/en/pdf>).

The new EU wastes directive establishes that bio-waste is either separated and recycled at source or it is collected separately and is not mixed with other types of waste. Negotiations between EU institutions have removed the Commission proposal which stated, "separate collection should happen where technically, environmentally and economically practicable and appropriate", therefore excluding the so-called TEEP exception .

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

**Please provide further comments :**

it is important that there is consistency across England for householders to identify how to collect biowaste. It is our single largest waste stream and needs to be tackled correctly.

One colour/labelled binliner should be mandated across the country, to drive down purchase costs, to ensure recognition from one council to another, to help treatment plants identify biowaste entering, and to help citizens understand that that colour bag should contain only biowaste. DEFRA should institute a Working Group with stakeholders to agree what the quality and identification of the bin liners should be. The bin liners, in order to ensure reduced plastic contamination to soil should be compostable under the standard BSEN13432 and soil biodegradable under the standard ISO17556 so that any fragments going to soil do

biodegrade naturally.

## Proposal 5

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

I am not responding on behalf of a local authority

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

**Please provide further comments :**

## Proposal 6

**23 What are your views on this proposal?**

**Please provide further comments :**

Separate presentation of food waste can lead to higher yields than commingled but this is not a guarantee. It is unfortunate that in building its evidence base, government has not looked deeper into the performance of the existing commingled schemes and has instead relied on some very old research which for its own reasons, WRAP has never revisited.

Of the top performing local authorities in England, four of the top eleven run commingled food and garden waste collections. Equally, there a large number of local authority separate food collections which do not perform, e.g. Sandwell which collects just 25 Kg / food waste / household per year at an annual cost of £650,000.

Government must recognise that local authorities are in the best position to understand what specific service is best for them and not force additional cost onto already authorities which are already performing well in this area.

The Greater Manchester area has been practising commingled collection of food and garden waste for many years as well as the separate collection of food waste in households without gardens.

Treatment in in-vessel-composting of the commingled waste streams, or in dry AD plants such as The Maltings, can offer high levels of overall recovery and recycling back to soil of compost as well as energy recovery. Wet AD, as we explain in our covering narrative, may have less beneficial impacts to soil when spreading digestate versus compost.

We recognise that a large number of households (at least 30%) in England have no garden waste and in these cases food waste should be collected separately.

The final destination of separately collected food waste or commingled biowaste (IVC or AD) will depend very much upon local availability of infrastructure and should be driven by market forces and left to Councils to negotiate that.

## Proposal 7

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

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

Agree

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

Agree

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

Agree

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

Agree

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

Agree

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

**Please provide further comments :**

Where commingled collections currently allow food to be collected with garden waste this should be allowed to continue.

Where Councils have a financial and environmental case for instituting commingled collections for treatment in dry AD or IVC, this should be allowed.

Where used sacks, paper or plastic, must only permitted if they are certified compostable according to BS EN13432. Currently, there is no standardised system to assess sacks in regard to premature degradation caused by the biological activity of the contents, e.g. grass clippings. We recommend therefore that Defra commission BSI to develop a standardised specification which can be used by local authority procurement officers.

## Proposal 8

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

Yes

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

**Please provide further comments :**

The Confederation of Paper Industries has issued guidelines quoted in our narrative on EPR which state that paper mills prefer not to treat paper/card that has more than 3% contamination by plastics- this includes plastic films stuck to paper/card as well as plastic tops on cardboard drink boxes etc. Therefore it would not make sense to enable the separate collection of composite materials which will contaminate waste streams in the treatment processes.

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

**Please provide further comments :**

We reiterate that the quality of collection systems, the continual communication process to engage with citizens, is as important as the decision about which materials to collect. Unless there is continual engagement and a high level of service quality, the decision about materials become almost irrelevant as they will be contaminated by other commingled streams.

## **Proposal 9**

**29 Do you agree or disagree with this proposal?**

Agree - bin colours should be standardised for all waste streams

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

Phased approach 1 - as and when contracts are renewed

**Please provide further comments :**

Both phases 1 and 2 would be acceptable

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

**Please provide further comments :**

This is a once in a lifetime opportunity to ensure consistency across England for collection containers. We strongly implore DEFRA to take that opportunity and to overcome the inevitable resistance of those who advocate for localist solutions.

## **Proposal 10**

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

Agree - government should publish statutory guidance

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

Agree

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

Disagree - it should be less often

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

**Please provide further comments :**

Flexibility should be allowed on residual collections so that Councils can move to less frequency when the collection of high volumes of recyclable materials is functioning. This may mean residual waste collections every three weeks.

## **Proposal 11**

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

**Please provide further comments :**

A national and continual communications campaign on waste collections is needed when we will have standardised collection systems, recognisably the same colour bins and biowaste binliners and clearly labelled packaging materials so citizens can identify the correct bin into which to place them. Until we have such a system in place, spending money on ad hoc and localised communications is frankly just wasting it.

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

**Please provide further comments :**

A major review of communication policies and messaging is required. We do not need more local campaigns right now. We need long term, widespread, national and continual information to support the new consistency framework once the legislation is in place; funding for that should come from revised EPR contributions.

**Proposal 12**

**38 Do you agree or disagree with this proposal?**

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

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

**Please provide further comments :**

**Proposal 14**

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

Disagree (please explain in the box below)

**Please provide further comments :**

We need binding performance indicators.

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

Agree

**Please provide further comments :**

The quality of service is a fundamental factor to ensure meeting recycling targets, engagement with householders and businesses, quality outputs. Allowing each council to decide its own benchmarking will put us back into the same situation we are in now with falling recycling levels, poor quality outputs, confusion over what packaging materials to recycle and so on.

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

**Please provide further comments :**

**Proposal 15**

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

Not sure/no opinion/not applicable

**Please provide further comments :**

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

Not sure/no opinion/not applicable

**Please provide further comments :**

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

**Please provide further comments :**

**Proposal 16**

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

Agree

**Please provide further comments :**

The dichotomy of waste collection and waste disposal authorities is outdated. The services needed to be vertically integrated.

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

**Please provide further comments :**

Localism, contractual obligations

**49 How might Government help overcome these barriers?**

Please provide further comments :

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

Please provide further comments :

### **Proposal 17**

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

Agree

Please provide further comments :

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

Option 3 mixed dry recycling, separate glass recycling, separate food recycling

Please provide further comments :

Broken glass is a major contaminant of paper, plastic and food waste. The separate collection of glass facilitates recovery of other streams.

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

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

Please provide further comments :

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

No

Please provide further comments :

**55 Do you have any other comments to make about Proposal 17? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?**

Please provide further comments :

Service quality and recycling volumes are strictly related to the amount of financial resources available to a) ensure segregated collection b) separate treatment c) a market for outputs that may need to be subsidised.

Therefore the reform of the EPR system is an essential pre requirement to increased levels of business recycling to provide funding for this.

### **Proposal 18**

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

Agree

Please provide further comments :

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

Disagree (please explain in the box below)

Please provide further comments :

We believe that all business should recycle food waste, either with specific in-house solutions or as part of the commercial system if their food waste is minimal.

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

Please provide further comments :

No. We note the approach taken in Scotland and Northern Ireland regarding 50kg and then 5kg limits. However, hundreds of thousands of small businesses each producing "just a few kilos" amounts to thousands of tonnes of food waste potentially destined to disposal rather than treatment. We should expect everyone to contribute their part to greater resource recovery.

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

**Please provide further comments :**

We support the inclusion of all food waste, meaning there would be no need to define 'food producing businesses'. The definition contained in the Scottish Waste Regulation provides a sufficiently broad scope: "food business" means an undertaking, whether for profit or not, and whether public or private, carrying out any activity related to the processing, distribution, preparation or sale of food" .

See <http://www.legislation.gov.uk/ssi/2012/148/contents/made>

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

No

**Please provide further comments :**

There should not be a threshold.

**61 Do you have any other comments to make about Proposal 18?**

**Please provide further comments :**

**Proposal 19**

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

**Please provide further comments :**

The costs associated with collecting food waste separately are so small that Government would be best employed in ensuring compliance rather than thinking about saving businesses pennies.

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

**Please provide further comments :**

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

**Please provide further comments :**

**Proposal 20**

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

Agree

**Please provide further comments :**

Monitoring waste production and recycling is important in order to avoid fraud, ensure compliance, create measurement data. Online monthly or annual reporting should be instituted for all businesses- such reporting is simple and low cost with IT solutions widely available.

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

**Please provide further comments :**