

Summary of LARAC response to main areas of Consistency Consultation 15.05.19

Question	LARAC Response
Q5 Core Set	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.
Q18 Food Waste	The concept of food waste collection is supported, however some LARAC members have carried out assessments regarding the introduction of food waste collections which have shown introducing the services to be cost prohibitive. This initiative can only be supported if there is long term guaranteed funding to cover any additional cost burdens to ensure funding is not taken away from other essential services.
Q24 Garden Waste	LARAC does not feel the full impacts of mandating a free garden waste service has been fully considered and has only focussed on recycling tonnages. The concept of mandatory free collections is not supported.
Q26 Quality	Under the Waste (England and Wales) Regulations 2011 local authorities are already required to separately collect paper/card, plastic, glass and metals where it is technically, environmentally and economically practicable and have therefore already determined the degree of separation which is best suited to the area. LARAC feels it would therefore be more appropriate for the objectives to be output driven, with the method for achieving this left to the discretion of each local authority.
Q29 Bin Colours	It may be challenging to provide a standardised colour coding which covers the options of a source segregated, twin stream or co-mingled system, which may result in the unintended consequence of an array of colour coding which brings about no tangible benefits. Whilst there could be marginal benefits in standard colours the scale, costs and pace of a change will be a big barrier to any sort of implementation, and it will be years before the results start to show any potential benefits. LARAC is not aware that data has yet been provided showing that financial benefits will be realised as a result of this standardisation.
Q32 Statutory Guidance	LARAC might support the principle of statutory guidance as it could assist with stable longer-term planning by minimising political influences with changes in elections. Reassurance that the standards would allow for some flexibility, such as allowing for less than fortnightly collections where appropriate, adapting to local circumstances and potential enforcement/penalties is required before full support could be given.
Q41 & 42 Performance Indicators	LARAC members are broadly supportive of non-binding performance indicators where they are designed to encourage positive performance. Single performance standards would not be appropriate for all indicators. Some would require to be tailored to reflect regional differences; for example, by taking into consideration geographical, housing type and social differences.