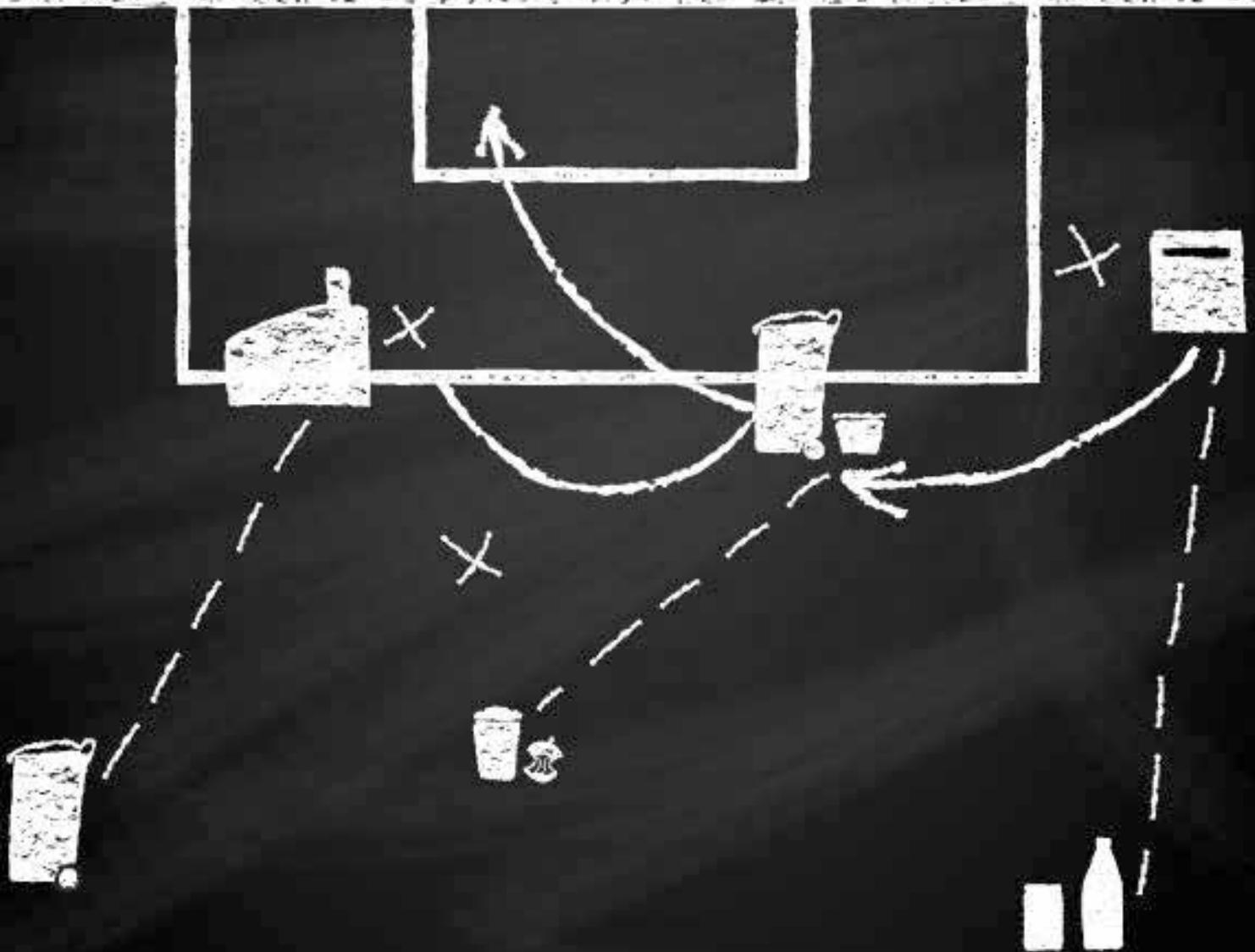


THE LOOP



The Resources and Waste Strategy Has Defra got the right gameplan?

Devolved administrations: How does the new Strategy compare?

Q&A with Chris Preston, Defra's Deputy Director of Waste & Recycling

LA Profile: Cornwall Council's Big Waste Data project

Editorial

Ashley Wild, LARAC National Rep



So here we are, rumbling along in to 2019 after another year of consultations and even more buzzwords and acronyms. EPR, PRN reform, FPNs for the Household Waste Duty of Care, DRS, single-use plastics... the list goes on.

The much-awaited Resources and Waste Strategy may finally have been released, but what has it actually told us? Despite covering many of these hot topics and key issues, with links to Defra's 25 Year Environment Plan, WRAP's consistency agenda and the EU Circular Economy Package, the majority of the Strategy is still subject to further consultation through 2019, 2020 and in even into 2021.

In my opinion, the Strategy has raised more questions than answers and whilst it gives us some direction, it is still unclear whether some of these initiatives will even be introduced, let alone provide a timescale to work with. The biggest concerns, as always, relate to finances. Defra has announced that more funding will be provided for local authorities, which is good news – cynically, however, I suspect that this may also be subject to consultation.

I've already had debates with my in-laws, who are asking when national food waste collections are being introduced and when they can expect free garden waste collections to be implemented because these hot topic issues have already been so well covered within the media. I tell them the truth: that I don't know – and looking at the Resources and Waste Strategy, I don't think the government does either, which is why so much of the Strategy is still subject to consultation.

I find myself writing this at a time when the UK and perhaps the wider EU appears to have an uncertain future. The Brexit turmoil has been heightened following the vote in the House of Commons that saw May suffer a historic defeat, while Germany is on the brink of recession and there are further rumours that the British high street is facing another fatal blow with Debenhams, one of my favourite stores, a whisker away from going in to administration. All of these are suggestions of a much more turbulent time to come for both the UK and Europe. 2019 could be a very interesting year... Subject to consultation of course!



4

- 4 News
- 5 Report from the chair
- 6 Policy: Dan Roberts
- 8 Overview: Waste Strategy
- 13 Context: What the RWS means for LAs
- 16 Lessons from devolved governments
- 20 Industry comment
- 21 Vox Pops
- 22 Interview: Chris Preston
- 26 Zero Waste Scotland
- 27 Welsh Government
- 28 LA profile
- 29 Exec profile
- 30 Members



8



22

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“ Local authorities want to recycle more, but it can't be at any cost and so targets do need to be realistic ”



Finally! I can change my stock phrase from 'the long-awaited waste strategy' to 'the recently published Resources and Waste Strategy'. We have provided a number of articles in this edition of *the Loop* covering the main points of the document, published just before Christmas. Already I feel the word of the year will be 'consult' as it appears no less than 93 times in the 146-page Strategy (including variations of the word).

So we have the vision, but we now have to work on the detail of how to achieve that. I was slightly surprised by a couple of proposals in the Strategy, one being to consult on whether households with gardens should have access to free garden waste collections, with the added caveat that 'new duties will be assessed to account for new burdens, and funded appropriately'.

With well over 50 per cent of councils now charging for garden waste collections, because legislation allows that, the cost of providing all those services for free will be huge. Isn't charging for garden collection a prime example of the 'polluter pays' principle? There are many households

without gardens in my council area, and I'm sure people who don't produce garden waste would prefer not to have to subsidise those that do. And what about those councils that don't charge at the moment? Will they get equal funding to stop them from charging? Ideally we should be promoting home composting as the preferred waste management option for garden waste, but this does not get a mention in the new Strategy.

Already we have senior ministers promising more money for increased recycling and to ensure councils are no worse off if a DRS is introduced (still saying 'if' – see page 61 of the Strategy). More funding will be needed if food waste collections are also mandated, and again what about the councils already providing such schemes? How are we to level this playing field?

The Strategy also says that to support higher levels of recycling by local authorities, government will consult on whether introducing non-binding performance indicators for the quantity of materials collected and minimum service standards for recycling would support this outcome.

This doesn't sound like statutory targets per se, but the Strategy does mention new statutory responsibilities for local authorities, of course, subject to consultation. And it sounds like the targets/performance indicators could actually be tailored to fit local circumstances, which may help level the playing field slightly. Local authorities want to recycle more, but it can't be at any cost and so targets do need to be realistic. Councils are best placed to decide what works in their own local area – this is what local democracy is about.

As I write this, we are waiting for the main consultations to be released, and then we can start putting some flesh onto the bones of the Strategy. EPR, DRS and consistency are all major considerations going forward into 2019 – the year of the consultation!

Carole Taylor

Carole Taylor, LARAC Chair



With Defra proposing to consult on collections consistency, **Dan Roberts**, LARAC Vice Chair, says we need to take local factors into account

“ The primary emphasis must be on harmonised and consistent material inputs and accessible reprocessing infrastructure ”

At the recent Resources and Waste Strategy Unwrapped event in London, I sat on the ‘Consistency’ panel and shared the LARAC view that consistency in recycling collections should focus more on the material collected and that calls for the same containers and frequency of collections across the UK are an unwelcome distraction to bigger industry issues.

At least 99 per cent of properties in the UK receive a kerbside recycling collection of paper, card, cans and plastic bottles (88 per cent for glass) and, as myself and LARAC colleagues have pointed out many times through discussions with Defra, the primary emphasis must be on harmonised and consistent material inputs and accessible reprocessing infrastructure. Our part of the supply chain is critical and local authorities are in the best position to determine, based on a range of local factors (e.g. demographics, material composition and availability of reprocessing facilities) an optimised, evidence-based collection system that minimises residual waste, maximises the quality and quantity of recyclate and works best for residents. Local sovereignty and accountability is crucial as it drives the high-quality services that we deliver daily to millions of residents.

There are clear areas where a consistent approach will benefit local authority waste services, much of which we have been doing for years. Consistent and understandable on-pack

labelling also has a key role to play. It would be an irresponsible use of council tax payers money to implement fully standardised systems that simply don’t serve our local population. What if there is no material off-taker available? What if analysis reveals that the material does not exist in sufficient quantities? What if the housing stock cannot safely accommodate another container?

At a recent industry roundtable event a reprocessor spoke of the pressure from their two customers to deliver higher-quality material. Whilst I sympathised with their position, I noted that even small district councils may have upwards of 100,000 customers, all with disparate needs, generating material of a complexity over which the council has very limited control. Whilst a mandated collection system may improve recycling rates to a degree, it is no silver bullet, and it will not take us to a recycling utopia. Without sufficient support it would also come at a high cost to cash-strapped councils that must rightly prioritise funding in other areas.

Rigid standards are more applicable to product design and we must strive for greater harmonisation of material inputs, as well as use levers to incentivise appropriate waste and reprocessing infrastructure in the right place. Consultations launched as part of the Strategy offer councils a great opportunity to evidence further why and how we provide the high-quality, value-for-money recycling services in the way that we do.

Strategy for success?

The Resources and Waste Strategy has largely been welcomed by the waste industry as a blueprint for the future. However, what will it mean for local authorities tasked with implementing many of the proposed changes? **the Loop** asks the question

Local authorities could be forgiven for taking an 'I'll believe it when I see it' attitude following the release of the government's Resources and Waste Strategy (RWS). After all, it's more than once in recent years that new targets or policies been put forward by central government, with implementation falling on the shoulders of local authorities, only for councils to watch as budgets are

slashed once again, forcing them to stretch every penny even further for little recognition.

In 2016/17, local authorities stumped up £600 million to deal with the costs of waste packaging, while producers of said packaging provided the rather lighter figure of £60 million. Meanwhile, in the same year, the clean-up of fly-tipping by rogue waste carriers and members of the public

cost councils around £57.7 million.

The RWS is meant to change all of that. The launch of the Strategy, as stated by Lee Marshall, LARAC CEO, "signals a fundamental change in the funding of household waste collections" and is "welcomed by local authorities, with the reform of the packaging regime in the UK long overdue".

Proposals to reform extended producer responsibility (EPR) would



Rural and urban local authorities face very different collection challenges



Flats recycling remains a key issue

see the implementation of a full cost recovery model, akin to that used in European countries such as France and Germany, which would see producers contribute the near total costs for the management of their packaging at the end of its life. While this is subject to consultation, and therefore not set in stone, it is a step in the right direction, and the public consultation process will allow local authorities to give their input on how any reform should look.

Furthermore, proposals on setting minimum standards for eco-design and requirements for recycled content in products provide much to be positive about. "The focus on product design and material use in the strategy should go a long way to reducing the range of materials that the public have to recycle and help with end markets and sorting facilities," says Marshall. "Change in this part of the supply chain will mean collection systems naturally become more consistent."

Amy Bridgford, Recycling and Waste Operations Manager at Aylesbury Vale District Council, echoes this point and also highlights the potential benefits of the Strategy's aim to improve guidance for consumers, saying: "Helping consumers take more considered action means more thought is put into items placed in recycling bins, which in turn has the potential to reduce contamination and the costs associated with this.

Implementing a key industry guidance and best practice for food, such as storage advice, will make it easier for people to waste less

However, the Strategy also throws up plenty that will have local authorities scratching their heads, especially about how any eventual changes are to be funded: the Strategy giveth, the Strategy taketh away. "It does contain some policy moves that are more of a concern to councils," says Marshall. "The intent to offer weekly food waste, free garden waste and consistent collections based on quality materials is vague and there is no indication of how these will be funded. The determination to press ahead with a DRS [deposit return scheme] when the evidence so far has not shown that councils will all save money is also a disappointment."

He continues: "The detail on changes to how HWRCs might operate are thin at this stage but will need careful thought and funding if they are to be achieved as hinted at in the Strategy."

Funding, as always, is a key sticking point in all of these proposed changes. The funding provided by packaging producers through EPR

reform is likely to only cover the costs associated with dealing with waste packaging and will not directly fund other services. While a full cost recovery model would free up money currently spent by councils on recovering packaging, the proposed expansion of services mooted in the strategy would eat into this funding quickly, more so with the adoption of the revised recycling targets in the EU's Circular Economy Package – 60 per cent by 2030 and 65 per cent by 2035 – which will require councils to extend their services even further.

There is no doubt that policies such as free garden waste collections would be inherently positive, but they cannot be implemented if they cannot be funded. As Bridgford says, a free garden waste service "would be beneficial for both the environment and the resident, however, it could be damaging to authorities that charge for the service", as they would lose the revenue generated from those charges and would have to look elsewhere for funding.

Meanwhile, seeing every local authority collect a consistent set of recyclable materials is a worthy aim. However, every local authority is different with varying financial, geographical and socio-demographic circumstances that affect what can be achieved. Bridgford states that a "one-size-fits-all approach" would

“not be realistic”, especially given the differences between rural and urban authorities. Maria Warner, Recycling Team Leader at Oxford City Council, emphasises the situation in her own council: “We are a dense urban authority with a transient population and individual arrangements must be considered. We did kerbside sort, but are now fully co-mingled. This has increased the material we collect and the efficiency of our service. Separating out materials could be problematic, as adding more containers for people to store could be an issue, while there is a limit to the amount of garden waste that is available for us to collect.”

Most councils already collect the recommended set of dry recyclables, but exactly how they are collected differs – and this is what the Strategy posits should be changed. “We offer a very comprehensive range of materials collected at the kerbside, so this shouldn’t be a major concern,” says Warner, “it’s more how we collect that could be affected. This could have significant resource implications regarding vehicles and infrastructure.”

If the consultation concludes that multi-stream collection is the preferred method of collection to drive up recycling rates and the quality of materials collected, then it will be necessary to set out how councils that currently operate co-mingled collections will be helped to change their system – after all, many that operate co-mingled collections do so for reasons of cost efficiency.

Transitioning to a new collection system, Bridgford points out, would mean “vehicles and rounds would have to change, and health and safety training, resident communications and the purchase of new containers would then have to be funded. It would be a huge project.”

It would be easy for local authorities to look at the Strategy and feel disheartened at the apparent extra burden being placed on them once again. While it appears that

the costs of dealing with packaging waste are set to be shifted onto the shoulders of producers, potential obligations to provide separate food waste collections and implement changes to collections systems, regardless of local circumstance, will pose new challenges, both financial and operational.

Every local authority is different with varying financial, geographical and socio-demographic circumstances that affect what can be achieved

The fact that much of the policy proposed in the Strategy is ‘to be confirmed’ due to the raft of public consultations, some of which are not expected to finish until 2025, does not provide local authorities with the certainty they need in order to make what will be significant changes in

the immediate future, especially with regard to how changes will be funded.

However, while the final nature of policies such as those on EPR and food waste collections remains open, local authorities have the opportunity to give their input into how these policies can work for the councils that will have to implement them. As Marshall states: “The consultations on EPR, DRS and consistency will be key in putting flesh on the bones of the Strategy and provide the detail that local authorities can respond to with their views.”

The RWS is the most significant contribution to English waste policy in nearly a decade, and while there are certainly elements that give cause for concern, it also provides a massive opportunity for local authorities to influence policy on waste and resources that may not come around again for a significant period of time. Councils must seize the opportunity with both hands and ensure that the final policies work for them.



How will weekly food waste collections be funded?

Cross-border connections

Enda Kiernan, CIWM President and Head of Waste Enforcement at Cork County Council, provides a view from CIWM on the Resources and Waste Strategy and suggests how knowledge might be shared between England and the Republic of Ireland



CIWM President Enda Kiernan

The new Resources and Waste Strategy for England sets the stage for a more holistic approach to resources and waste management and positions it as part of the wider clean growth and industrial productivity agenda. This is long overdue, as is the whole product/material lifecycle approach, which not only prioritises more action at the top of the waste hierarchy but also ensures alignment with the EU Circular Economy Package.

In its 2017 Resource Productivity Manifesto, CIWM called on government to, among other things:

- Embed better resource productivity and efficiency as a key strand of government economic and environmental policy; and
- Provide a clear and stable future policy direction to 2030 and beyond, taking account of the development of the EU Circular Economy framework.

I believe those asks have been answered in the Strategy, albeit with a lot of the detail and implementation yet to be confirmed through a raft of consultations over the next three years.

The emphasis on waste as a valuable resource mirrors the policy framework here in the Republic of Ireland. In the 2012 policy document entitled 'A Resource Opportunity', one of the priorities identified was the role of household waste collection in achieving the overall policy objectives, the key challenges at the time being low rates of household participation and insufficient incentives for households to segregate waste.

Of course, here we opted to roll out the 'pay as you throw' model; in the English strategy, the approach is to move towards consistency in collections, the provision of a separate food waste collection to every householder and appropriate businesses and better joint working between local authorities, especially in 'two-tier' areas. All of these have the potential to significantly increase recycling and the delivery of quality materials to the market, but the key to unlocking them will be the development of an effective extended producer responsibility framework for packaging, with full net cost recovery to fund the collection and treatment infrastructure. That is why the Defra consultations on packaging reform, deposit return and collection consistency are so vital and why we will be looking at them closely here in Ireland too in readiness for a review of our own strategy this year.

The strong focus on tackling waste crime is also timely, as illegal activity is

becoming more endemic and serious across the whole of the UK and Ireland. Proposals in England to strengthen the regime for waste carriers, brokers and dealers are, I believe, particularly important. Here in the Republic, waste carriers are permitted rather than simply licenced, so they are subject to permit conditions, which include specifying the types of waste they can handle and where they can take them. We will also be keeping a close eye on proposals to develop innovation digital solutions to tracking waste: this is an area where collaborative approaches and cross-border coordination could help to clamp down on organised waste crime.

Chair's response

Time will tell whether the Resources and Waste Strategy will enable higher recycling from households. Enda explains that the Republic of Ireland's 'pay as you throw' model was their answer to low household participation, whilst our strategy does not mention this as even being on the horizon. LARAC's funding policy paper published last year stated that we need a robust and comprehensive research programme to establish how a discretionary direct charging system for household waste collection could be implemented in the UK. Whilst direct charging for waste may not be for everyone, we should be able to at least look at how this may be a useful tool for those councils that think it is feasible.