

THE LOOP



Winning hearts and minds

Targeting behaviour change to boost recycling



Communications: What tools are available to councils?

Q&A with Sarah Clayton, WRAP's Head of Citizen Behaviour Change

LA Profile: Conwy and the switch to four-weekly residual collections

Editorial

Ashley Wild, LARAC National Rep



We are all familiar with the phrase 'more bang for your buck'.

With ever-tightening purses and exacting budget constraints, local authorities need to become increasingly savvy when it comes to communications and engagement with residents.

Social media is everywhere in today's society and it is predicted to reach 54 million people in the UK alone, through the use of smart phones, by 2022.

According to the Office for National Statistics, 89 per cent of adults in the UK used the internet at least weekly in 2018, up from 88 per cent in 2017 and 51 per cent in 2006; this is something local authorities must exploit.

However, despite the power of social media, some residents still do prefer a good old-fashioned letter. Bin stickers, bin hangers, printed leaflets and the trusty collection calendar still adorn many fridge-freezer doors across the UK, vital materials for those without internet access, with a hectic lifestyle, or just with a poor memory.

As a local authority Waste and Recycling Officer, I've faced many challenges with tackling contamination. Some authority areas

have a higher proportion of non-English speaking residents, which means written communication can be a challenge. It is therefore important to remember your target audience!

I've developed bin storage signs with photographic images of common recyclable and non-recyclable materials with what appears to be the internationally-recognised green 'tick' and red 'cross' symbols. Granted, it's a very simple and somewhat crude method; however, I say it is internationally-recognised because it has proven to be very successful in areas where written communication did not initially work.

I guess what I'm trying to say is that social media and online communications can be used to reach the masses, but this barrage of adverts and messages are often short-lived and can become white noise. Mixing it up with written communications, graphical images and bin stickers can help push longer-term messages more effectively than social media and online methods. There is no one-size-fits-all and it's down to what works best in any given area. It's a delicate balance of efficiency versus effectiveness.

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“ The public should not have to pay twice for systems that compete to recycle the same materials ”



In my last piece for the Loop, I talked about waiting for the Strategy consultations to be released, and by the time you read this the deadline for responding will have been and gone! It's been a busy few months in our industry, especially with getting the LARAC responses formulated. We heard in January that the consultations may only be eight weeks long, and so we wrote to Defra with our concern about this and the issues it presented in relation to being able to provide a detailed member-led response. We were grateful for the support of other organisations that followed suit.

On 18 February, the consultations were launched and it was reassuring to see they were twelve weeks long, not eight – maybe our letter did the trick. We'd already devised a timetable ready for the documents landing, and so we hit the ground running! A briefing paper went out to all LARAC members on the same day that the consultations landed, and within a couple of weeks we'd launched our online member survey.

We also decided to run five nationwide workshops for our

members to come and talk to us about the consultations, and these were well-attended, with over 130 delegates participating. I managed to attend two of them and it was interesting to hear the thoughts and ideas they had; we received some really positive feedback from members about the workshops. These were crucial in developing our final consultation responses and I am really grateful for all those that managed to give up some time to attend – not easy when the day job is so demanding.

One of the main views I have taken away is that members would like to see extended producer responsibility (EPR) packaging reform and consistency of collections be implemented first before even considering a deposit return scheme (DRS). It feels too soon to introduce a competing system when we need to see what a fully-formed EPR and consistency regime can do in increasing recycling rates. There's also more support for this from the Institute of Economic Affairs (IEA), which has called for the government's plans for DRS in England to be

abandoned unless 'a more robust economic case' can be made. The IEA has warned that the system is a 'very expensive way of achieving very little' and will lead to local authorities losing out on revenue.

I'm so glad to hear that other people out there feel the same way as I do, and are starting to say what I have been saying since I attended the Defra workshop on DRS last year: funding should be put into council kerbside collections first to improve and enhance the materials we collect, more research is needed to establish if a DRS will work when layered on top of the existing recycling collection infrastructure, and the public should not have to pay twice for systems that compete to recycle the same materials. As more evidence such as the IEA's comes forward, it feels like a 'no DRS' is the common sense approach – let's hope it prevails.

A handwritten signature in black ink that reads "Carole Taylor". The signature is fluid and cursive, with a small flourish at the end.

Carole Taylor, LARAC Chair

A measured response

With the UK on the cusp of a step change in its approach to waste and resources, LARAC CEO **Lee Marshall** summarises LARAC's contribution to the Resources and Waste consultations on deposit return, collections consistency and extended producer responsibility

It probably isn't quite right to say the dust has settled since the closing date passed for the four consultations – on a deposit return scheme (DRS), extended producer responsibility (EPR), collections consistency and the Plastics Tax – given the storm they generated will take a while to ebb away. We do, however, have a chance to draw breath and take stock of where we are following the responses that we all submitted.

LARAC committed as much of its resources as it possibly could to providing full and representative responses, which are summarised below – while LARAC submitted a response to the Plastics Tax consultation it is the least relevant to local authorities and has not been discussed here. The level of member engagement that was undertaken in the twelve weeks is probably the

biggest and most concentrated in our history and reflects the importance of these consultations.

It was also a reflection of our desire to improve what we do for our members and to give the membership fee a value to members. The responses were the ideal time to not only help members with their own responses but make sure that the LARAC response got as much input from members as possible, so that it represented their views widely and accurately.

To this end we undertook an online survey early in the process that helped to shape our stance on several issues and then held five workshops across England that over 130 people attended. The outputs from these workshops helped to both refine our stances and shape the detail of the responses to various questions within each consultation.

DRS

It became clear early on that views on DRS were split between the 'all in' option and the 'on the go' option amongst LARAC members. Previously, LARAC's stance had been that a DRS would impact on the income and costs of local authorities and that it didn't make sense to layer another collection scheme on top of the kerbside system for the same materials. Whilst these positions still held true, the concept of EPR and the indication that local authorities would have their full net costs covered meant that the argument that local authorities would be worse off could be seen as no longer valid.

It was at this point that a third option emerged and LARAC decided to take the stance of deferring a DRS in the UK. Given the aspirations that are being pinned on the consistency and EPR fields the view was these





should be given space and time to be implemented and show progress before we decide on whether a DRS is needed. This also gives much more opportunity for more thorough research into the impacts of a DRS on local authorities, how it could work with improved kerbside schemes and what the true costs would be to producers.

The level of member engagement undertaken in the twelve weeks is probably the biggest and most concentrated in our history

LARAC is clear in its position that DRS is just one way of implementing EPR for some packaging types and producers are not 'paying twice' if they are obligated under DRS and an EPR system. They would be contributing towards two collection systems: the local authority infrastructure of kerbside, bring banks and HWRCs under an EPR system, and the DRS infrastructure of reverse vending machines and return points.

However, it is difficult to see how two competing systems collecting the same materials represent good value for money for producers.

It will be interesting to see how the rest of the industry responds. If a similar view about deferring emerges then it will also be interesting to see how the various governments respond to that view given that the Scottish Government, and to a slightly lesser extent, the UK Government, are committed to introducing a DRS.

Consistency

For obvious reasons this was the consultation document that most local authorities were engaged with and were looking to contribute their own detailed responses. It was also the one that grabbed the headlines, with proposals for weekly food waste, free garden waste and standardised collections for councils to consider.

LARAC's response included a lot of high-level agreement with the basic proposals but with caveats about the details of the potential implementation. A theme running through the response on consistency is that there is a need to increase the end market and the sorting infrastructure before local

authorities will be able to offer a consistent set of materials for collection. Aligned to that is the need

to rationalise the materials used in packaging as well, which would help sorting and markets. These are points that LARAC has been making for the past couple of years; at the start of the consistency work that WRAP completed, the original focus was on collections, but this quickly morphed into looking at all aspects of the material infrastructure.

On the food waste proposal there was general agreement amongst members that it was the right thing to do from an environmental viewpoint. However, like most considerations relating to new services, the main question was where the funding would come from and what it would cover. The workshops highlighted a range of areas that funding would need to cover above the standard vehicles, crews and caddies.

The proposal for free garden waste was also one that gained general consensus, but this time against it, not for it. There were a range of reasons why councils felt that it was not a viable proposal. One was that it was almost too late given over 60 per cent of authorities now operate 'charged for' services; there was a strong feeling that it was a case of chasing material to meet targets. There may be an element of truth in this as the UK has signed up to the EU Circular Economy Package (CEP) and within that is a target of 65 per cent recycling by 2035.

This new target covers municipal waste, which includes organic waste, and Defra believes that to achieve 65 per cent recycling, garden waste will





have to make up a decent portion of that tonnage, which goes some way to explaining its designs on free garden waste collections. The LARAC view is that charged garden waste services can deliver good levels of garden waste and that it is not necessary to resort to a free service to guarantee you collect a decent tonnage.

EPR

In some respects, it could be argued that the EPR consultation is the most important out of the four. The government would not have been able to bring forward the consistency proposals if it was not backed up with the potential EPR funding and, while consistency could bring big changes, EPR is set to deliver huge amounts of funding to local authorities.

Full net cost should mean exactly that and there should not be an operational target above which councils would not be funded

The consultation started to bring to life the concept of ‘full net cost recovery’ contained in the EU’s CEP. It was pleasing to see that the definition was broader than most probably expected and included the costs of packaging in residual waste and litter, as well as the recycling collections. The LARAC response supports this broader stance from the government, as well as highlighting some areas that there was concern might have

been overlooked, such as the cost of collecting packaging in the residual waste stream.

One surprise within the consultation was the concept of family groups and reference costs for the service of local authorities in each group. The consultation contains no detail on the purpose of this reference cost and how it relates back to the payment of the full net costs. LARAC has raised various concerns about this and will wait to see what detail is contained in the next set of consultations. However, LARAC was clear in stating that full net cost should mean exactly that and there should not be an operational target above which councils would not be funded.

The other main aspect of this consultation was the four different governance models for how packaging compliance should be managed in the future. At first glance this might not seem of much interest to local authorities but, given that this is going to be the mechanism by which funds will flow to councils and how packaging targets will be met, it will have significant future implications for local authorities.

Overall, there were some basic principles that LARAC members wanted from whichever model was chosen, key to which was an easy and transparent system for getting payments made to them. On balance, that led to a preference for model two, which proposed one single compliance body and the end to competing compliance schemes. There will obviously be other parts of

the industry that would not welcome that and LARAC does work hard with other sectors, but this was one area where local authority needs had to come first.

It is likely there will be a range of views expressed on the various governance models and some new ones proposed as well so it will be no surprise if future consultations have new choices that blend aspects of these four original choices.

Conclusion

It is hard to believe that these consultations were originally planned to be only eight weeks long. The twelve weeks given for stakeholders to go through them still felt like they were not long enough, given there were four consultations all together.

It has been a period of time where LARAC has engaged with members in great detail and this has meant a genuine two-way flow of information. The members have been able to get support and input from the information LARAC has sent out, from the day one briefing on the consultations to the copies of our final response. In return LARAC has gained valuable input through the survey and workshops that helped the responses that we put in. Before the next set of consultations emerge LARAC will review the whole exercise and then use that learning to refine, change and improve the way it handles consultations and its wider policy work. This will ensure it is fit for purpose and delivering benefit and added value to members.

Keeping it simple

As the Resources and Waste Strategy consultations come to a close, **Jane Bevis**, Chair and Director of OPRL Ltd, explains the labelling initiative's position on consistency and collections



OPRL Chair Jane Bevis

At OPRL Ltd (the On-Pack Recycling Label scheme) our purpose is to reduce consumer confusion and increase confidence in recycling correctly – and more often – so that the UK can stand alongside Wales as a leading recycling nation.

We wholeheartedly support a UK-wide consistent list of packaging and materials collections. This must take account of the outputs of the guidance from WRAP and the Confederation of Paper Industries on fibre-based packaging, as well as the UK Plastics Pact deliberations on recyclable polymers, if extended producer responsibility (EPR) objectives are to be met. And the impact of a drinks deposit return scheme (DRS) is crucial (we back an on-the-go scheme rather than all containers as people are used to kerbside collections).

We don't believe a one-size-fits-all approach to recycling collections is feasible or desirable. Research shows:

- Design of household collections must reflect community needs and demographics;
- Different recycling targets should apply to different localities;
- Performance tables should be grouped by 'family', determined as above;
- Recycling targets and communications campaigns should be determined centrally, with appropriate funding, to support EPR obligations;
- Bin type/colour are secondary;
- Mandatory free garden waste collections are irrelevant in many communities and are beyond the remit of EPR funding; and
- As EPR takes effect, further efficiency savings will be needed if producer funding is to finance new infrastructure.

Our research shows age, gender, housing tenure and type, life stage and population churn all significantly affect attitudes to recycling and actual recycling behaviours. This requires different collection systems, consumer engagement and recycling targets. On-the-go (quantity and quality) is key in inner cities and high footfall locations frequented by young people, night-time economy customers and workplace lunchers. Elsewhere, home and community collections could deliver huge results – environmental and heritage organisation members and young families have very positive attitudes to recycling and can be recruited to do more.

Consistency of messaging is as important as consistency of collections. Centrally-agreed messages

designed to deliver national targets should be deployed according to community demographics via channels used by target audiences – much good work is already evident in social media, but it's fragmented and patchy. Developments like OPRL's We Recycle app enable local authorities, brands and retailers to deliver personalised, locationally-specific messages (including bin colour!) from a single platform to people wherever they are – at home, on the go or on holiday.

We have a once-in-a-generation opportunity for transformational change – let's put consumers and residents at the heart of it!

LARAC Chair's response

Recycling collection consistency is important, and local authorities need to be able to make local decisions on how best to collect from their residents and businesses, so LARAC agrees with Jane on this. However, whilst simplifying messages and educating consumers may be a key part of increased recycling, LARAC is concerned that some consumers may not change their behaviour and make use of improved schemes. Local authorities need stronger tools in relation to enforcement of communications and systems. Without stronger measures to nudge residents who are less inclined to recycle, then participation levels are likely to only reach certain levels, making high recycling harder.