

THE LOOP

A young boy with brown hair is shown in profile, looking upwards with a curious expression. A silver arrow with blue and red fletching is balanced on his head, with a red apple core still attached to the shaft. The background is a soft-focus green forest.

Targeting organic waste

Will Defra's food and garden waste collection proposals hit the mark?

Organic waste treatment options:
What's available?

Q&A with Charlotte Morton, Chief
Executive of ADBA

LA Profile: Manchester City Council's
flats recycling campaign

Editorial

Andrew Bird, LARAC National Rep



What would our lives be like without plastic? It's impossible to tell, but I doubt we could function as a society without it. Yet with Blue Planet and, more recently, Hugh and Anita's War on Plastics, plastic has now become a demonised material. This is all well and good, and it is undoubtedly terrible to see the adverse effects that plastics are having on the world's environment. However, it is my view that plastic itself isn't the problem, it's mankind's management of it – and other materials – that has caused these problems.

Plastic is a wonderful material and, if managed properly, should be sustainable. Without plastic packaging on food we would have far more food waste (the focus of this issue of *the Loop*) and damage to other materials, but its management as a resource is woefully lacking and it has been too easy for manufacturers across the globe to use it without any thought towards its long-term effects. This clearly has to change and, at least in the UK, it looks as though proposals for extended producer responsibility will at last force manufacturers, brands, pack fillers and retailers

to think more about the design of products and packaging.

The current packaging compliance system has never been truly effective in generating reprocessing infrastructure within the UK, and it has been far too easy to export plastic yet still claim monetary value in terms of packaging recovery notes. The outcome of this is all too clear to see in the recent TV programmes mentioned above: once export happens we seemingly lose control, or I suppose in some circumstances we simply don't care what actually happens to the plastic people have thoughtfully separated for recycling.

Clearly things need to change, but I would add a note of caution on jumping on the bandwagon to satisfy people demanding action, thinking we are doing the right thing, but instead creating unintended consequences that could be worse for the environment. An example of this was recently sent to me: a bakery announcing it was no longer wrapping its bread in plastic, and how great this was. The reality was the bread is now wrapped in a composite paper product, which cannot be recycled. But hey, at least it's not plastic.

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Give us consistent materials
and we will give you consistent
collections

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It was difficult to know what to write about for this edition of *the Loop* as so much has happened in the last three months. We have a new Prime Minister, a new Environment Secretary, Defra has published its responses to the Resources and Waste Strategy consultations, and we recorded the hottest July day on record and the hottest day ever in the UK, if the 38.7°C in Cambridge is verified.

The consultation responses will be examined in more detail by LARAC's policy team, but as I type this what I have gleaned so far is there will be more consultations in early 2020 on consistency, extended producer responsibility (EPR) and a deposit return scheme (DRS), and ahead of that there will be a number of stakeholder workshops with Defra that we will be attending in order to represent our members. Mandatory labelling of packaging as recyclable or not recyclable seems to be going ahead, as is consistency of recycling collections for dry recycling, i.e. glass bottles and jars, paper and card, food and drinks cans, plastic bottles and plastic pots, tubs and trays. Separate food waste collections from 2023

are likely to be mandated but free garden waste collections are still being considered due to costs. There will be a requirement on businesses to recycle their waste, but standardised bin colours may not go ahead.

One of the last speeches Michael Gove gave as Environment Secretary was to support the introduction of an 'all-in' DRS from 2023, but now that Theresa Villiers is in post, I'm hoping that LARAC's call to introduce EPR and consistency before proceeding with a DRS (if at all) will be heeded in order to avoid costly systems competing for the same materials.

Plastics continue to dominate the news headlines, and WRAP has recently launched a best practice guide for producers in selecting plastic polymers that are recyclable. This will help the On-Pack Labelling Scheme (OPRL) adopt what is classed as recyclable under the UK Plastics Pact. LARAC is on the advisory group that is looking at OPRL's 'Recycling Rules', which aims to update the guidance later in 2019.

We've also seen a call for a 'National Recycling Standard', which came from the results of a food packaging survey carried out by INCPEN and

WRAP. Drilling down into the detail, this supports what LARAC has been saying for a while now – give us consistent materials and we will give you consistent collections (end markets dependent of course). More than half of respondents were keen to see packaging that is recyclable (54 per cent) and even more (59 per cent) wanted all packaging to have a clear and definitive labelling system with no ambiguity. An OPRL survey carried out recently found that 84 per cent of people look for recycling information on packaging.

There seems to be a common theme here – consumers want consistency, simplification and easy-to-understand packaging around the products they buy. The industry wants the same, as do local authorities. Now is the time to get on with it and improve recyclability and recycling for the benefit of all concerned and our environment.

A handwritten signature in black ink that reads "Carole Taylor".

Carole Taylor, LARAC Chair



LARAC Policy Support Officer **Dianne Hewgill** weighs up the pros and cons of free garden waste collections

“ Assurance that funding would be available long-term, cover all of the costs and be equitably available to all councils is essential before free garden waste services can be endorsed ”

The proposal in the recent Defra consistency consultation that all households with a garden should receive a free garden waste collection came as a surprise to many of us. Whether this policy should be supported or not has been the cause for debate within local authorities, with no consensus emerging.

With free services it could be argued that those with no gardens are subsidising a service for which they get no benefit. Whilst this may be true, waste management and, in particular, garden waste collection forms a very small proportion of each council tax bill, while other services such as adult social care take up a large part of the budget but only reach a small proportion of the population. 1-0 in favour of a free service.

In general, there is a correlation between larger more expensive houses and larger gardens so there is an argument that these properties can afford to pay. However, there are many older properties in higher deprivation areas that have sizable gardens and rely on the free service to be able to maintain the gardens. Both are valid arguments so equal points for both: 2-1 in favour of a free service.

Charging is a good example of the Polluter Pays principle and encourages home composting, which has fewer environmental consequences than kerbside collection. Limited evidence shows that only a small proportion of green waste is diverted through the residual collection when a paid-for service is introduced. A paid-for garden waste service is considered to be more efficient and have a lower

environmental impact as bins that are more likely to be full are collected. This has a lower carbon footprint as the route is maximised in comparison to a free service, which collects from all properties, many with rarely used bins, so charging probably wins on the environmental argument: 2-2.

Costs are probably the most crucial point and one where there is considerable uncertainty. The consultation indicates ‘new net costs’ would be covered although it is unclear how this is defined. Local authorities charging for garden waste raise substantial revenue which either partially or fully covers the costs of the service. Assurance that funding for this service would be available long-term, cover all of the costs and be equitably available to all councils is essential before free garden waste services can be endorsed.

The elephant in the room is where funding for green waste collections will come from. Covering the full costs of garden waste collections to all local authorities would be a substantial budget commitment from central government and would inevitably require funding to be moved from elsewhere. When so many essential services are under stress it raises the question of whether this is a suitable expenditure commitment. With local authority funding being constantly cut, full funding in perpetuity is unlikely; it’s therefore realistically 3-2 in favour of allowing councils the choice on whether to charge or not.

With the outcomes of the consultations expected before the end of the year, it will be interesting to see which elements have greater weight.

Stabilising the system

With the price of plastic PRNs soaring, **Paul Van Danzig**, Sales Marketing Director at Wastepack, defends the packaging producer responsibility system and identifies where it can be improved



Paul Van Danzig, Sales Marketing Director at Wastepack

The Packaging Waste Regulations are cited as being complicated, confusing and lacking transparency. However, the premise of these regulations is actually quite simple. The UK has to meet recycling and recovery targets for different packaging materials placed on the market. The target is a percentage of the estimated flow of packaging in the waste stream. Accredited reprocessors/exporters ensure there is enough recycling capacity available to meet the target and the cost is met by obligated businesses, via the purchase of PRNs/PERNs.

If capacity is sufficient to meet the targets without the need to do extra recycling, then the cost to businesses is relatively low. But if the capacity needs to be increased then reprocessors/exporters raise extra funds by increasing the value of the recycling certificate to ensure enough funds flow through the system, to do the extra recycling needed, so the targets are met – welcome to the PRN/PERN system!

This system, in place for 22 years, has become a victim of its own

success. Despite its critics, the system has delivered everything it has been asked to do in meeting the UK recycling targets at low cost to businesses.

But now there is a real problem. Many of the countries that have traditionally accepted exported material (plastic) have closed their doors. If the material has no home then PRNs/PERNs cannot be generated, and consequently the recycling industry is having to go further to ensure enough recycling is undertaken to meet the target.

The cost of meeting the target is reflected in the price of PRNs/PERNs, which has contributed to the 400 per cent increase in price this year. Accusations of a broken system, with allegations of talking up price, holding onto material and creating uncertainty, are all cited for the increases. But it may be that the phenomenon we are experiencing is simply the system doing its job; generating enough funds from obligated producers ensuring enough recycling takes place to meet targets.

There have been talks regarding the introduction of a compliance fee to be used to relieve pressure in the system. A mechanism that enables obligated businesses to remain legally compliant in the event of a genuine lack of evidence would be useful, but are we convinced that a tool that can interfere with free markets is necessarily the right approach? We must consider unintended consequences. Ideas such as reporting monthly accurate data, time-limited PRNs/PERNs that have to be sold within 12 weeks of generation, may help to stabilise the market.

This would be a positive move.

Ultimately, if we are to make the UK's recycling systems work we all need to play our part, giving consumers the right information so they dispose of materials properly, producing fully recyclable packaging, creating end markets for materials and becoming more self-sufficient, relying less on shipping material abroad – sounds a lot like the government's Resources and Waste Strategy!

We live in interesting times, with endorsements to design and build a sustainable system that works for everyone. With the spotlight shining brightly upon us, it's time to step up to the plate and make this happen.

LARAC Chair's response

Responding to the recent packaging producer responsibility consultation, LARAC highlighted the funding deficiency of the existing PRN system, with local authorities currently covering 90 per cent of the cost of dealing with waste packaging. We welcome the changes that the proposed new system will bring, ensuring that producers, not local authorities, pay the full net cost of the packaging they place on the market. Stable end markets and simplified packaging that is easy to recycle and clearly labelled are essential if we are to introduce a consistent collection system. We are looking forward to the second round of consultations in early 2020 and will ensure the LA voice is heard loud and clear.

Responsible cooperation

the Loop speaks to **Charlotte Morton**, Chief Executive of the Anaerobic Digestion and Bioresources Association (ADBA) and, more recently, the World Biogas Association (WBA), about organic waste, bioplastics and collaborative working between industry and local government

How would you describe the remit of ADBA when you started?

The association was first officially launched in about September 10 years ago, following a death in the industry at Biogas Nord. The view was that there was a lot of technology coming in that didn't meet British standards, and because of that there were concerns about the level of risk. So the remit of the organisation at the very beginning was to develop standards and best practice.

I came on board about the time it was being launched to provide a little bit of help, and never really left! The strategy that I wanted to take was to demonstrate the potential of the industry, and to facilitate the industry delivering that potential in the UK.

How have things evolved for the organisation since then?

We've always wanted the industry to deliver its best potential, and that remains the case for ADBA and for WBA today. But there's plenty of room to improve. We want to see much more investment going into research and innovation, because there's so much untapped potential that we could get out of the industry. The WBA launched a report a few weeks ago, for example, showing that if the industry was able to capture all of the reasonably capturable organic waste around the world, it could reduce global emissions by around 13 per cent.

The government's Resources and Waste Strategy signals an intent

to encourage separate food waste collections in England by 2023. What's the likelihood that this will actually be adopted?

I'm always more optimistic than many! There's still quite a big challenge over timelines, and there are contractual barriers for many local authorities as well. But the government's made a net-zero commitment, and the carbon reduction contribution of separate

It's really important that communication is done well; the better the comms, the higher the capture rate

food waste collections and recycling through AD will be a pretty significant part of that. There are also a growing number of local authorities and new councillors who are declaring a climate emergency, so the drivers are now becoming so imperative and urgent that I see a high chance that the policy will come in.

How might food waste collections impact the AD market in the UK in terms of capacity?

There are slightly different estimates as to how many new plants we will need, depending on how much feedstock comes out of the new collections – we're thinking there will probably be around four million tonnes of added feedstock. The industry view is that we might need 20, 25 new plants, but there's a considerable amount of

spare capacity already, and we're reasonably capable of building new plants quite fast, so I don't think there's particularly an issue as far as the availability of capacity.

Gate fees for food waste have fallen in recent years – is this a reflection of a long-term market equilibrium?

No, this is simply a demand-supply issue – there's too much capacity and not enough feedstock. If you're in an area where there is really a lot of capacity, you will be seeing negative gate fees, and that's not viable. But it's impossible to say where the long-term price will anchor. What we expect to happen is that we will get more food waste coming out, the demand-supply ratio will change, and gate fees will go up. And then as you get more capacity coming online gate fees will come back down again.

How big of an issue is contamination for those AD operators that process household food waste?

It's a huge issue. And it's really important for so many reasons – particularly for council finances – that communication to local households is done well, both in terms of what they're supposed to be recycling and why. The better the comms, the higher the capture rate, which is when local authorities make money.

The use of biobags is important too; they give consumers the right impression about the value of organic material and act as a reminder that plastic is a contaminant. As an

industry, we have to take what comes down the line to us, so we need to stop plastic and other contamination coming in at the front end.

Is there enough recognition on the part of local authority waste officers of what contamination looks like and the impact it has on AD plants?

I would expect ADBA members to say that there is a real range of understanding in councils, from the well-informed to the less so. We've offered to facilitate meetings on site so that local authority officers can come and see what an AD plant looks like, and what the impact of contamination is – because we're all involved and collectively we have to make sure the system works. From a householder perspective, we all need to understand what happens to the stuff we buy and put in our bins. And the more we can all take responsibility for what we're doing, and understand the implications, the better.

My impression is also that the AD industry is not complaining enough and pushing back as much as we should on contamination. That could well be because gate fees are so low, and operators may fear that the food waste will go somewhere else if they complain. But we should be pushing back much more than we are to force local authorities to act to improve contamination levels.

What's the picture when it comes to compostable and biodegradable caddy liners – how do ADBA members feel?

Fundamentally, we have to be producing quality products and returning quality material back to soil – we cannot have plastic contamination going back to soil, we can only have biodegradable products. And you get higher capture rates if you use a biobag.

But there is further work that needs to be done about the post-digestion treatment stage and how



Charlotte Morton, CEO of ADBA and WBA

we achieve best value from this – there are questions about whether AD operators should be adding a composting stage to the end of their process, for instance. Evidence from Italian studies suggests that you get better results from co-locating AD and composting facilities, but what we do in the UK is different from Italy in some respects, so further research is needed.

Any final words from the perspective of ADBA members to local authorities?

We all have a role to play in this process of managing the 'waste'

material that we are collecting and recycling. So we need to make sure that we are working together collaboratively, with householders as well, to understand the whole process; it requires a joined-up approach from start to finish.

We fully understand the constraints that local authorities are under, and our members are very happy to facilitate meetings and events on AD sites to explain how they work. We're also looking at providing materials for local authorities to show councillors what the process is all about – there's a lot we can do to help councils engage with AD.