

Waste and Recycling Committee

Date: 13 July 2021

Subject: Resources and Waste Strategy for England Consultations

Report of: Paul Morgan, Head of Commercial Services, Waste and Resources Team

PURPOSE OF REPORT:

To update the Committee on the Consultation on Consistency in Household and Business Recycling in England and its possible implications for Greater Manchester.

RECOMMENDATIONS:

Members of the Committee are recommended to:

1. Note and comment on the matters set out in the report.

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Equalities Implications:

There are no equalities implications of this report.

Climate Change Impact Assessment and Mitigation Measures –

The report itself has no climate change impacts but the changes that are proposed and being consulted upon by Government may have both positive and negative climate change impacts. During the assessment of waste management changes as a result of the Government's Resources and Waste Strategy climate change will be a key consideration in the practicability of change.

BOLTON
BURY

MANCHESTER
OLDHAM

ROCHDALE
SALFORD

STOCKPORT
TAMESIDE

TRAFFORD
WIGAN

Risk Management:

Initial risks have been collated and are being captured in the Service’s risk register.

Legal Considerations:

None currently.

Financial Consequences – Revenue:

There are no financial consequences of this report directly. However, changes in waste services in Greater Manchester may be required at a later date and they may have financial consequences.

Financial Consequences – Capital:

There are no financial consequences of this report directly. However, changes in waste services in Greater Manchester may be required at a later date and they may have financial consequences.

Number of attachments to the report:?**Comments/recommendations from Overview & Scrutiny Committee****BACKGROUND PAPERS: Yes, please see below list:**

- 1 [Consistency in Household and Business Recycling in England - Defra - Citizen Space](#)
- 2 [Extended Producer Responsibility for Packaging - Defra - Citizen Space](#)
- 3 [Introducing a Deposit Return Scheme in England, Wales and Northern Ireland - Defra - Citizen Space](#)
- 4 The GMCA’s combined and submitted reposes to the EPR, DRS and Collection Consistency consultations – available from the Contact Officer

TRACKING/PROCESS		
Does this report relate to a major strategic decision, as set out in the GMCA Constitution		Yes
EXEMPTION FROM CALL IN		
Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?		
GM Transport Committee	Overview & Scrutiny Committee Overview & Scrutiny Committee	

	14/01/21 Waste Strategy Report, Housing, Planning and Environment Overview and Scrutiny Committee	
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1. INTRODUCTION/BACKGROUND

1.1 At the April 2021 Committee meeting a report summarised the consultations relating to:

- The national Waste Prevention Plan;
- Extended Producer Responsibility (EPR) for Packaging; and
- A Deposit Return Scheme (DRS).

1.2 At that stage the consultation on Consistency in Household and Business Recycling in England had not been published. It was subsequently released following the Local Government and Mayoral elections in May 2021.

1.3 At the April 2021 meeting it was resolved to approve the stated approach to responding to these consultation and delegate authority to the Chair of this Committee to approve the responses.

2. CONSIDERING THE CONSULTATIONS

2.1 Through the Strategic Officer Group a small working group with district representation met twice to consider the EPR, DRS and (when published) the Consistency consultations. These three consultations contained over 260 questions – some of a technical and administrative nature and not immediately applicable to service delivery whereas others required detailed consideration and extended answers.

2.2 In assisting our responses to, particularly, the Consistency consultation we had commissioned the consultants Wood Group to undertake an implications assessment of the known waste collection models proposed by DEFRA. This assessment looked at the 'whole system' from the household right through to bulking and treatment facilities and end markets as well identifying contractual issues. The report from Wood has strengthened our response to Government.

3. CONSISTENCY IN COLLECTIONS SUMMARY

3.1 The Government expects the measures set out in the consultation could help to:

- Increase the quantity and quality of household and business recycling;
- Make recycling easier for householders;
- Support comprehensive waste and recycling collections through establishing minimum service standards;
- Give confidence to packaging producers that an increased amount of quality recyclable material will be collected and returned to secondary materials markets;
- Improve investor confidence and help increase UK-based recycling capacity and minimise dependence on overseas export markets for recycling;
- Ensure an increased amount of separately collected food waste and garden waste can be recycled through anaerobic digestion and composting;

- Improve estimates of the demands for future recycling and residual waste treatment infrastructure;
- Ensure only what is necessary is sent for energy recovery or landfill helping to reduce greenhouse gas emissions; and
- Significantly increase job creation in collection implementation, promotion and management of the new services.

3.2 The Government wants England to recycle more and improve resource efficiency. In achieving these aims the Government believes householders want consistent, reliable and easily understandable waste collection services. Building on the first consultation, the second makes a number of proposals across the spectrum of collections.

3.3 The Collection of Dry Recycling from Households

3.3.1 The Government wants to provide clarity on what dry recycling they should collect – these are proposed to be:

- Plastics including pots, tubs and trays and later, plastic ‘films’ and flexible packaging;
- Mixed paper and card;
- Cartons (to be mixed with plastics stream);
- Metal packaging (aluminium and steel cans), aerosol cans and foil and foil trays; and
- Glass bottles and jars.

3.3.2 These should be collected separately from households to improve both quantity and quality and (with the exception of plastic films and flexible packaging) should be collected from at least October 2023 (to coincide with the first payments from the EPR system). Plastics films will be delayed until 2026/27 so that a number of operational challenges can be addressed.

3.3.3 Implications for collections across Greater Manchester (putting the separate collection aside for the moment):

- The addition of PTTs would be welcomed by the public (and to some extent are already collected but treated as contamination) but would require modification to our materials recycling facility – this may not be achieved by October 2023;
- On cartons – we currently collect these with paper and card. We would need to complete an assessment to demonstrate that including them in the plastics stream is not technically, environmentally and economically practicable; and
- Plastic films – DEFRA is seeking views on how these should be collected. There are very few authorities who collect films and flexible packaging at the kerbside so more work is needed on this before we can understand the impacts.

3.4 Separate Collection of Food Waste

3.4.1 The Government has held a firm line on its desire to see food waste collected separately and on a weekly basis from 2023/24. Indications are that the collection frequency is not an area for compromise. However, collected food waste mixed with garden waste on a weekly basis may be something we can demonstrate is the best option for Greater Manchester.

3.4.2 Implications for collections across Greater Manchester:

- Weekly collections will increase fleet numbers significantly. The Wood research indicates many district depots would struggle to accommodate additional vehicles. There would also be an increase in vehicle emissions as well as a contribution to congestion across the conurbation;
- If we are required to collect food waste separately from garden waste households would require an additional set of containers; and
- Our biowaste treatment contracts are set to expire at the end of March 2026. This is in response to not yet understanding how we will be required to collect the material and to develop our strategy for biowaste from 2026.

3.5 Garden Waste Collection

3.5.1 Previously the Government was keen to see every household have access to free garden waste collections. Response from the first consultation suggested that this was not universally welcomed by those local authorities who already charged. As a result (and perhaps in light of the estimated cost) the Government is seeking further views and has published what it considers a 'reasonable charge' for garden waste collection and this is lower than the national average.

3.5.2 Implications for collections across Greater Manchester:

- As no GM authority currently charges for garden waste collections there is no impact.

3.6 The Separate Collection of Recyclable from Households

3.6.1 In the first instance the Government wishes to see plastics, fibres, glass and metals all collected separately (add to that food waste, garden waste and non-recyclable waste that is seven waste streams). However, it considers that mixing plastic and metal or glass and metal may be acceptable.

3.6.2 It is recognised that the separate collection may not be technically, environmentally and economically practicable (TEEP) in all cases. A process of demonstrating why separate collections are not practicable is proposed. The assessment (to be considered by the Environment Agency who will have the power to charge for the review) will have to demonstrate why – the following grounds are suggested as reasons:

- Technical practicability – the impact of housing stock (e.g. flats, HMOs, student accommodation), rurality, availability of suitable containers, storage of containers at properties, and storage in existing waste infrastructure;
- Economic practicability - local authorities will need to demonstrate that their specific financial costs (caused by their local circumstances) makes it significantly more expensive to have separate collections based on (e.g.) housing stock, rurality, and availability of recycling and treatment infrastructure; and
- Environmental practicability - local authorities will need to make the case that separate collection is of no significant environment benefit based on, for example greenhouse gas emissions, reject tonnages, lifts per vehicle and journey length.

3.7 Implications for Collections across Greater Manchester

- 3.7.1 In considering the three grounds for exception to separate collection to some extent the economic argument cannot be applied. The EPR regime is going to pay local authorities for the “effective and efficient” collection of packaging and the weekly collection of food waste (whether separate or mixed) will be financially supported by the Government’s new burdens payments.
- 3.7.2 On technical practicability – Greater Manchester has a diverse and challenging housing stock. In some cases seven containers may be accommodated, in others they certainly would not be able to be. Allied with that – separate collection requires a significantly enlarged fleet and as mentioned previously the councils do not have the depot space to accommodate an increased number of collection vehicles.
- 3.7.3 On environmental practicability – it is interesting the test is ‘no significant environmental benefit’ of adopting separate collections. The research Wood has undertaken has demonstrated that on a carbon metric having weekly kerbside sort collections reduces carbon by less than 2% across the whole waste system compared to our current service.
- 3.7.4 Previous discussions at Committee have indicated that an increase in the number of containers at the household level would be challenging operationally, have impacts on the street scene and prove difficult for our residents in many cases.
- 3.7.5 It should be noted that the consultation is silent on the issue of health and safety. For several years the health and Safety Executive (HSE) has been looking closely at waste collection. Initially it was the transition from sack collections to wheeled bins but when kerbside recycling expanded its focus was more on the use of recycling boxes and the hand sorting of materials (generating manual handling, laceration and noise hazards). Our response will make reference to this and it is understood DEFRA is consulting with the HSE on how health and safety can fit into assessments.

3.8 Minimum Service Standards

- 3.8.1 The Government will mandate the weekly collection of food waste and is considering the recommendation of minimum service standards of alternate weekly collection of residual waste subject to affordability and value for money.

3.9 Non-Household Municipal Collections

- 3.9.1 The Environment Bill which will be the legislative vehicle that implements the proposed changes also applies to non-domestic premises that produce household waste (e.g. schools and hospitals) and businesses producing commercial waste.
- 3.9.2 Effectively these premises will be required (and the waste collection companies (including local authorities) will have to provide suitable services) to having the same level of recycling collections as households (a threshold of generation may be set for the collection of food waste as in Scotland).
- 3.9.3 The Government believes that small and micro-firms (those with fewer than 50 and 10 full time equivalent employees respectively) face barriers to recycling. To address these barriers the Government is suggesting a package of support and perhaps changing the way waste services are procured in business improvement districts or allocating (through a procurement) a single waste collector to operate in a defined area such as a town centre – “zoning”. This may result in those councils collecting commercial waste either winning new work or losing their customer base in those zones.

3.10 Timescale for Implementation

- 3.10.1 As indicated above, the Government would like to see moves to implement changes (even if only adding PTTs to plastics collections) from 2023. However, it is recognised that one of the big barriers to change is contractual. The Government does not want to foot the bill for the impacts of changing services mid-contract term so will accept the phased introduction of changes until around 2031 where applicable.

3.11 Funding

- 3.11.1 The funding of changes will come from two sources:
- the Government’s new burdens ‘budget’ which should cover the costs of implementing weekly food waste collections; and
 - the packaging EPR payments for the collection of packaging for recycling or disposal. As these payments will be based on modelling it is not known as yet whether they will fully fund the collections they cover.
- 3.11.2 In both cases the scope of the payments is not clear. Some guidance on this was provided in the EPR consultation but if, for example, enlarged depots are required to accommodate more collection vehicles, the source of funding for that is not stated.

4. NEXT STEPS

- 4.1 The GMCA has already submitted the EPR and DRS consultation responses and the Consistency response is being reviewed for submission prior to 4 July 2021.

- 4.2 During the Summer of this year we will be taking a number of awareness raising reports to Members and senior officers. Support will be provided to districts if they require it for their own internal awareness raising.
- 4.3 It is anticipated that during the Autumn the Government will publish its response to the consultations and that will start to give a steer on the direction waste management will be going in. Following this there will be further consultations on statutory guidance and minimum service standards probably into 2022.
- 4.4 When we have an indication, we can start work on our own household waste management strategy which will take 12 months or so to develop and require a strategic environmental assessment and potentially public consultation.
- 4.5 On biowaste – work has commenced on a strategy for how we manage this waste stream from 2026. This will accelerate once we understand what the Government will require of us. There is very little capacity in the North West for biowaste treatment capacity so we will need to consider a wide range of options for securing capacity for our material.