

## **GM Housing, Planning and Environment Overview & Scrutiny Committee**

Date: 01 February 2022

Subject: Potential Implications of National Resources and Waste Strategy

Report of: Councillor Allison Gwynne, Chair of the GMCA Waste and Recycling Committee

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### **PURPOSE OF REPORT:**

The report provides Members of the Committee with an update on the development of the Resources and Waste Strategy and the potential implications for waste management in Greater Manchester.

### **RECOMMENDATION:**

The Committee is recommended to:

1. Note the report and to request further updates as Government releases the next consultation responses and guidance.

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## **BACKGROUND PAPERS:**

The following is a list of the background papers on which this report is based in accordance with the requirements of Section 100D (1) of the Local Government Act 1972. It does not include documents, which would disclose exempt or confidential information as identified by that Act.

Overview of Our Waste, Our Resources: A Strategy for England. Waste and Recycling Committee 24<sup>th</sup> January 2019

Resources and Waste Strategy: Consultations. Waste and Recycling Committee 14<sup>th</sup> March 2019

Resources and Waste Strategy Update. Waste and Recycling Committee 22<sup>nd</sup> July 2020

England's Resources and Waste Strategy Update. Waste and Recycling Committee 14<sup>th</sup> October 2020

National Waste and Resources Strategy – Implications for Greater Manchester. Housing, Planning and Environment Overview & Scrutiny Committee 14<sup>th</sup> January 2021

England's Resources and Waste Strategy Update. Waste and Recycling Committee 21<sup>st</sup> April 2021

Resources and Waste Strategy for England Consultations. Waste and Recycling Committee 13<sup>th</sup> July 2020

## **1. INTRODUCTION**

1.1 In December 2018 the Government published its national Resources and Waste Strategy (RaWS) setting out "...how we will preserve material resources by

minimising waste, promoting resource efficiency, and moving towards a circular economy in England.”

1.2 The RaWS has two overarching objectives:

- (i) To maximise the value of resource use; and
- (ii) To minimise waste and its impact on the environment.

1.3 The RaWS will be delivered through policies, actions and commitments which adhere to at least one of five strategic principles:

- (i) To provide the incentives, through regulatory or economic instruments if necessary and appropriate, and ensure the infrastructure, information and skills are in place, for people to do the right thing;
- (ii) To prevent waste from occurring in the first place, and manage it better when it does;
- (iii) To ensure that those who place on the market products which become waste to take greater responsibility for the costs of disposal – the ‘polluter pays’ principle;
- (iv) To lead by example, both domestically and internationally; and
- (v) To not allow our ambition to be undermined by criminality.

1.4 Two rounds of consultation on the proposals have been completed – the most recent covering:

- (i) Proposals for the introduction of a plastic packaging tax to encourage greater use of recycled plastic as a raw material;
- (ii) Reforming the packaging producer responsibility regulations in the UK;
- (iii) Introducing a deposit return scheme for drinks containers in England, Northern Ireland and Wales; and
- (iv) Measures to accelerate consistency in recycling for both households and businesses in England.

1.5 These consultations closed in June and July 2021 with the GMCA providing a response on behalf of the nine authorities covered by the Waste Disposal Authority

(Wigan is a unitary authority and makes its own arrangements for waste disposal). The responses were approved by the Waste and Recycling Committee.

- 1.6 In preparation for the consultations and to inform for the development of waste collection and disposal services, the GMCA commissioned an implications assessment to understand the financial, infrastructural and contractual consequences of the Government's preferred model of waste collection. This report focusses on the proposals contained within the consultation on the measures to accelerate consistency in recycling for both households and businesses, their potential cost to Greater Manchester, their impacts across various aspects of service delivery and what might be done to ensure changes fit with Greater Manchester's particular circumstances.

## **2.0 THE GOVERNMENT'S PREFERRED METHOD OF HOUSEHOLD WASTE COLLECTION**

- 2.1 It has been widely publicised that the Government's preferred approach to the collection of household waste is to segregate and collect separately seven materials for recycling and to specify a core set of materials within the dry recycling stream that must be collected, these being:

- a) Mixed paper and card;
- b) Plastics (including pots, tubs and trays (PTTs) and later, plastic 'films' and 'flexible packaging');
- c) Cartons (to be mixed with plastics stream);
- d) Metal packaging (aluminum and steel cans), aerosol cans and foil/foil trays;
- e) Glass bottles and jars;
- f) Food waste;
- g) Garden waste (free at the point of collection); and
- h) Non-recyclable waste at a maximum fortnightly frequency.

- 2.2 The reasons provided for the separate collection of the materials are that Government believes it will increase the quality of the recycling collected, promote consistency of collections across England and increase the quantity of recyclable materials collected. Clearly, providing seven separate collection containers at each home

(including flats) will be a challenge irrespective of the type of property and has raised concerns nationally. This would mean investment in new and additional collection vehicles designed for the kerbside sort collection method, additional crews being required and additional depots and maintenance areas being required to accommodate the expanded fleets. In a step that does potentially reduce the number of containers (to six) the Government sought views on the possible mixing of metals and plastics or glass and metals.

2.3 It should be added that Defra provided an update on its thoughts on the implementation of consistency in waste collection at a waste management sector conference in November 2021. In brief these were:

- The collection of dry recyclables mixed in certain combinations will be permissible under the Environment Act using an exemption and/or based on a specific cost/benefit analysis known as a TEEP assessment justification (see section 3.0 for further details on TEEP);
- Collection of garden waste and food waste together (as now in GM) will be permissible under the Environment Act using an exemption; and
- Collection of food waste on a weekly basis (including if co-collected with garden waste) is a legal requirement under the Environment Act and any deviation cannot be justified under an exemption or via a TEEP assessment.

2.4 This may permit the continuation of our current dry recycling collection service but force a move to weekly food/mixed organic waste collection. It cannot be taken for granted that this update will be the final position but perhaps demonstrates there is likely to be some flexibility in some aspects of the final 'choices' for consistent collections. Much of the detail outlined in this report reflects the Government position contained within summer 2021 consultation documents as the most recent written position. Responses to these consultations and further information on the implementation of the RaWS is anticipated to be released in Spring 2022.

2.5 There is a collection method that can accommodate the separated materials (excluding garden waste and non-recyclable waste) on a single vehicle. It is referred to as the kerbside sort methodology and utilises a number of boxes for the materials which are then emptied into compartments on a 'resource recovery vehicle' (RRV).

This is very much a manual process reliant on lifting and tipping of boxes and potentially the hand sorting of any mixed streams and removal of contaminant. RRV-based services have a lower productivity rate and lower capacity – therefore significantly more vehicles and crews would be needed to collect Greater Manchester’s recyclable waste. However, RRVs are more fuel efficient compared to the traditional compacting refuse collection vehicle and have a lower purchase price.

2.7 As mentioned above, the GMCA commissioned an analysis of the impacts of the RaWS proposals. The following table compares the financial<sup>1</sup>, infrastructural, environmental and contractual impacts of replacing our current collection system with the Government’s preferred waste collection methodology.

<b>Service description</b>	<b>Current Services</b>	<b>Kerbside Sort Service</b>
	<p><b>Four bin system</b> Separate collection for each numbered waste stream (i.e., four containers) using compacting refuse collection vehicles (RCVs)</p> <ul style="list-style-type: none"> <li>(i) mixed food &amp; garden waste</li> <li>(ii) mixed paper, card &amp; cartons</li> <li>(iii) plastic bottles, glass &amp; metal cans</li> <li>(iv) non-recyclable waste</li> </ul>	<p><b>Six container system</b> Streams (i) to (iv) below <u>collected weekly</u> on the RRV, streams, (v) and (vi) separately collected. This would effectively require an RRV fleet <u>alongside</u> an RCV fleet.</p> <ul style="list-style-type: none"> <li>(i) food waste</li> <li>(ii) mixed paper &amp; card</li> <li>(iii) plastics &amp; cartons</li> <li>(iv) glass and metals</li> <li>(v) garden waste</li> <li>(vi) non-recyclable waste</li> </ul>

<sup>1</sup> The modelling used cost and performance information provided by each WCA and does not include all costs associated with service provision (for example staffing costs only include frontline staff and immediate supervision). In developing the comparator modelling agreed assumptions were applied on parameters. The results presented here are high level.

## Modelled revenue costs (rounded) per annum opex

Service description	Current Services	Kerbside Sort Service
Collection	£51.8m	£68.0m reflecting the increased number of vehicles for the recycling service
Disposal	£45.5m	£36.0m reflecting the lower cost of treating separate food and garden waste <sup>2</sup>

## Infrastructure impact

Service description	Current Services	Kerbside Sort Service
Collection	N/A – as current services	<ul style="list-style-type: none"> <li>• Complete change of collection fleet – significant increase in vehicle numbers (from 258 to 352)</li> <li>• Many WCA depots could not accommodate the expanded fleet and workforce requiring new sites to be developed</li> <li>• Complete change of recycling receptacles</li> <li>• Slower vehicle emptying</li> <li>• H&amp;S concerns over the return to boxes (e.g. manual handling, lacerations, noise)</li> </ul>
Disposal	N/A – as current services	<ul style="list-style-type: none"> <li>• Would require re-configuring of all waste reception facilities to accept segregated streams (e.g. construction of new bays)</li> <li>• Change of vehicle types for the handling of waste at transfer loading stations (e.g. to forklift trucks)</li> <li>• Some potential redundancy of the MRF used to sort mixed recyclables</li> <li>• Increased turnaround times on site due to increased vehicle numbers</li> <li>• Potential development of our own biowaste treatment infrastructure such as anaerobic digestion for food waste</li> </ul>

<sup>2</sup> This has been calculated using an estimated gate fee for the treatment of the two streams at merchant facilities.

## Environment – CO<sub>2</sub> equivalent emissions annually

<b>Service description</b>	<b>Current Services</b>	<b>Kerbside Sort Service</b>
Collection and transport (pa)	74kt	71kt
Materials processing and disposal (pa)	2,390kt	2,348kt

## Contractual and procurement

<b>Service description</b>	<b>Current Services</b>	<b>Kerbside Sort Service</b>
Collection	N/A – as current services	<ul style="list-style-type: none"> <li>• Transition to the new service would take several years as current districts fleet replacement programmes are generally staggered</li> <li>• May require costly in-term change for the two outsourced authorities</li> <li>• Procuring vehicles and containers will be challenging as demand will be very high from many other councils</li> </ul>
Disposal	N/A – as current services	<ul style="list-style-type: none"> <li>• Uncertainty over capacity of market to accommodate increased and changed material flows</li> <li>• Changes would require new and potentially separate contracts for the treatment of food waste and garden waste or construction of biowaste treatment capacity by the GMCA</li> <li>• Unless services changed at natural contract end would require significant contract change (with costs associated)</li> </ul>
<b>Modelled recycling performance</b>	51.3%	1 52.4%

### **3.0 HOW MIGHT THE RAWs REQUIREMENTS BE DELIVERED ACROSS GREATER MANCHESTER?**

3.1 The Government's preference may be for the separate collection of materials, but it is recognised that up to six containers may not be possible for every area. Therefore, a mechanism by which waste collection authorities can undertake a technical, economic, and environmental practicability assessment (known as a TEEP assessment) to justify the selection of a system that deviates from the preferred option is being developed.

3.2 At this stage the Government has not specified the format of this assessment (and it will be subject to further consultation in 2022), however it has provided an indication of the kinds of constraints that may contribute towards a deviation – these include:

- Technical practicability – the impact of housing stock (e.g. flats, multi occupancy dwellings, 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 environmental benefit based on, for example greenhouse gas emissions, reject tonnages, lifts per vehicle and journey length.

3.3 Greater Manchester's 'choice' of waste collection model will be very strongly driven by its housing stock. The conurbation has a very high proportion of high-density street level properties where multiples of containers (up to seven) are very unlikely to be able to be accommodated without impinging on daily life in and around the home and on the street. Where pockets of properties might be able to accommodate the Government's preferred waste collection option it would be uneconomic and impractical to operate a different collection method from the majority.

3.4 Although we are yet to see the full TEEP assessment requirements, based on the examples of what may inform the selection of a deviation from the preferred option, it is believed a strong case can be argued for the retention of much of our current core waste system (i.e. the four bin system) because:

- It is consistent across GM and proven to work across the varied street level housing stock of Greater Manchester;
- Generates generally good quality materials;
- Is straightforward to understand and communicate;
- Keeps key materials apart (e.g., paper and glass);
- Gives each waste collection authority some flexibility on collection frequencies and container sizes to suit their own circumstances;
- Enables the use of vehicle fleets that can cover the collection of any of the streams without the need for specialist vehicles;
- Is designed to dovetail with a comprehensive and long-term treatment and disposal infrastructure; and
- There is no significant environmental benefit (based on CO<sub>2</sub>-equivalent emissions) of changing to a kerbside sort RRV based system.

3.5 There are some changes/additions we may have to make and these will have financial and service implications:

- a. Food waste collection - the Environment Act mandates the separate collection of food waste on a weekly basis. The November 21 Defra update indicates that mixed food and garden waste collections may be permissible under an exemption but this is yet to be confirmed;
- b. Currently we collect a mixed organics stream (food waste with garden waste) and the frequency varies from authority-to-authority and on time of year. This waste stream is treated via in-vessel composting (IVC) utilising contracted capacity (until 2026) at a number of merchant facilities. The quality standards for the material accepted are tightening and we expect costs to increase as a result regardless of the option we select;

c. Clearly the mandating of separate weekly food waste provides the GMCA with a number of challenges and a range of potential options:

1. Continue with our current collection and treatment assuming that an exemption from the mandatory separate collection of food can be applied. The potential penalties for not complying with the Environment Act are as yet unclear;
2. Continue to collect as a mixed organic fraction and utilise 'dry' anaerobic digestion (AD) to treat all the collected material;
3. Continue to collect as a mixed organic fraction and utilise emerging treatment technology that compresses the waste allowing a slurry to be treated via 'wet' AD and the dry fraction treated via IVC; or
4. Separately collect the food waste and treat via wet AD and compost the garden waste.

d. The following table summarises some of the considerations for each option:

<b>Option(s)</b>	<b>Vehicles</b>	<b>Carbon</b>	<b>Infrastructure</b>	<b>Financials<sup>3</sup></b>
1 – as now, contrary to legal obligation in Environment Act	No change	No change – the lowest carbon benefit of the four options	Post 2026 we will need either new merchant contracts or build new facilities.  Construction of own facilities provides certainty	No change on collection.  New contracts may see a small increase in costs if capacity is available.  Construction of own facilities could be depreciated over 25 years resulting in a per tonne gate fee roughly equal to now.
2 – dry AD	No change	Better carbon performance than option 1 as gas can be recovered from the treated biowaste but not as good as option 4. Better than option 3.	Post 2026 we will need to build new facilities as there is no merchant capacity currently.  Construction of own facilities	No change on collection.  Construction of own facilities could be depreciated over 25 years resulting in a per tonne gate fee roughly equal to now.

<sup>3</sup> To accommodate the GMCA's biowaste over 200ktpa of capacity would be required. If separate, food waste accounts for around 25-40% of this total.

			provides certainty	
3 – new technology	No change	Better carbon performance as gas can be recovered from the treated biowaste. Not as good as option 2.	Post 2026 we will need to build new facilities as there are no facilities of this type operating – technology risk.  Construction of own facilities provides certainty	No change on collection.  Construction of own facilities if depreciated over 25 years resulting in a per tonne gate fee roughly equal to now but with a new technology there may be additional costs and risk to be factored in.
4 – separately collect	Increase in fleet to accommodate the weekly collection of food waste (options range from 99 -250 additional vehicles across the GMCA)	Highest carbon benefit of the four options as gas recovery is maximized through wet AD	Post 2026 we will need to build new facilities as there are no facilities of this type operating – technology risk.  Construction of own facilities provides certainty	Significant increase in fleet costs (ability to accommodate the fleet also a risk with insufficient depot space).  Wet AD capacity lacking in NW but construction of own facilities provides certainty – costs could be depreciated over 25 years. No merchant capacity in region so would require own investment.

- e. In addition to the options above we will also explore the possibilities of developing regional facilities with neighbouring or near neighbours to generate economies of scale. There are also opportunities to build in additional capacity to accommodate commercial food waste inputs as the RaWS also places obligations on businesses to recycle food waste;
- f. We will be strongly arguing for the retention of the collection of mixed organics but are likely to have to find a way to deliver a weekly collection;
- g. The addition of plastic pots, tubs and trays (PTTs) – across the nine Greater Manchester districts covered by the WDA, PTTs are not currently collected due to lack of sustainable markets. Unlike plastic bottles which

are mainly made of two types of plastic (HDPE and PET) plastic pots, tubs and trays are made of a range of different types of plastic of varying quality;

- h. All plastics in theory can be recycled but it is not currently technically or economically viable to recycle PTTs. In Greater Manchester, we only collect plastic bottles because there is a sustainable market for them, and we can guarantee they will be recycled.
- i. If PTTs are to be added to collections it could result in an additional 33ktpa of material sent to our materials recovery facility (MRF). The MRF does not have capacity for this material and as a result we may need to either invest in new equipment or capture the material in the reject stream and send it away for further processing at a third-party facility (but this would still put strain on the plant). Given the potential additional tonnage (33ktpa) we may need to develop an additional process plant to accommodate this material. In the longer term, the RaWS proposes changes to packaging manufacture to increase the recycled content of plastic packaging and to reduce the number of plastic polymers used. Both steps will improve the recyclability of PTTs and stimulate market demand. Delaying collection until these changes take effect could avoid sunk costs in modifying the MRF and disposal of collected materials in the interim; and
- j. The addition of 'soft' plastics (carrier bags, bread bags, bubble wrap etc.) – again these plastics are difficult to collect, sort and recycle and including them in services could add a further 11ktpa to our MRF. Films can cause problems at MRFs becoming entangled in moving parts resulting in blockages, downtime, and additional maintenance costs. In our consultation response we argued for the expansion of collection points at stores rather than see the materials added to kerbside collections. Again, if we are mandated to collect at the kerbside, we will need to invest in MRF infrastructure or alternate treatment options which are now emerging such as conversion of plastics to fuels.

## **4.0 WILL DEVIATIONS BE PERMITTED?**

- 4.1 The RaWS indicates that the recyclable waste streams must be collected separately from each other, except where this is not technically or economically practicable, or where there is no significant environmental benefit from separate collection.
- 4.2 The Consistency consultation states the *“Environment Agency can assess compliance of Waste Collection Authorities but cannot serve compliance notices on Waste Collection Authorities. The Environment Agency may audit parties in the waste chain to assess compliance with legislation and statutory guidance. As part of this, the Environment Agency would be able to request and audit a proportion of written assessments.”*
- 4.3 This seems to suggest that WCAs and WDAs (and we would look to draft a single integrated TEEP assessment for Greater Manchester (excluding Wigan)) draft an assessment and then deliver their services according to it – it doesn’t need to be submitted for approval as such, but the EA may select it for audit at a later date.

## **5.0 HOW WILL CHANGES BE FUNDED?**

- 5.1 As summarised above, changing to a fully RaWS-compliant service could see an increase in service costs of at least £6.7m per annum across the nine WCAs and the WDA. In terms of economic practicability this would seem to rule out any suggestion of changes in the current local government landscape.
- 5.2 However, the Government has stated that it is committed to supporting the costs of service changes by providing funding from:

- The Government’s New Burdens ‘budget’ which would cover the additional costs of implementing weekly food waste collections. The Government’s recently published Net Zero Strategy states:  
*‘To support our commitment to explore options for the near elimination of biodegradable municipal waste to landfill from 2028, we are bringing forward £295 million of capital funding which will allow local authorities in England to prepare to implement free separate food waste collections for all households from 2025.’;*

- No further details have been announced and it is noted this is a capital amount and not ongoing revenue commitment so unclear if this is New Burdens funding or not. This £295m would need to cover around 340 waste collection, waste disposal and unitary authorities; and
- Providing payments to local authorities for the additional costs from collection, treatment and disposal of packaging contained within household waste (including litter). This money is coming from a new Extended Producer Responsibility” (EPR) regime for packaging.

5.3 The EPR consultation indicates local authorities will receive payments covering the “necessary costs” for the collection, management and disposal of packaging waste (whether that packaging is contained within the recycling stream, non-recyclable waste stream or litter). The EPR consultation proposes that necessary costs include:

- Operational costs to collect, manage and dispose of packaging waste including any investment in capital infrastructure or innovation, where it can be shown to increase performance and help producers meet Extended Producer Responsibility targets and outcomes.
- Support costs in achieving scheme outcomes and targets, including communications and provision of public information on waste prevention and recycling, efficiency reviews, data gathering and reporting, performance incentives, and supporting local authorities in contract negotiations and variations with service providers.

5.4 On the face of it this sounds promising that funding will be available but of course this was only suggested at the consultation stage, and we are yet to see any further detail or draft legislation enshrining these commitments. Additionally, the financial support is for the necessary costs of “effective and efficient systems”.

5.5 Discussion in the EPR consultation expands how “effective and efficient” will be assessed. It is proposed to apply a performance model that would link the modelled costs of service delivery to recycling performance so necessary costs are unlikely to reflect actual costs. This model would take into account “geographic, socio-economic and other factors” that impact on cost and performance. There are likely to be winners

and losers and it is suggested that authorities under-performing would see payments reduced accordingly, those over-performing may see payments increased.

- 5.6 The Government intends the EPR funding will arise from additional costs to packaging and goods producers which are likely to be ultimately passed on to consumers.
- 5.7 The Government has indicated that it would like to see the first EPR payments flowing from the body administering the scheme to local authorities in the second half of the 2023/24 financial year. However, before then the scheme rules have to be firmed up, a scheme administrator procured, and a monitoring and payment mechanism devised and agreed.

## **6.0 HOW DOES A DEPOSIT RETURN SCHEME FIT IN?**

- 6.1 A further initiative was being consulted upon alongside changes to waste collection and the EPR for packaging – a deposit return scheme (DRS) for glass and plastic bottles and metal drinks cans (and some other materials). It is envisaged that consumers would pay a deposit on top of the retail price of their drink and return their empty container to a reverse vending machine to receive the deposit back in some form. The item would then be segregated for recycling generating clean streams of material.
- 6.2 The DRS scheme will see several thousand reverse vending machines placed within supermarkets and in public spaces and will likely remove a significant volume of materials from recycling bins reducing recycling performance at the kerbside level.
- 6.3 What is unknown is how EPR payments to local authorities will be affected by the removal of a significant amount of packaging from the waste they manage. In addition, with the potential for a significant volume of recycling removed from kerbside services refuse collection vehicles will be collecting a lot less materials and therefore running inefficiently. This, in the longer term, may provide opportunities for rationalising services (using smaller vehicles perhaps) or collecting other materials as they emerge.

## **7.0 WHAT ARE THE TIMESCALES FOR RaWS IMPLEMENTATION?**

7.1 As indicated above, the Government would like to see moves to implement RaWS changes 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 and subject to confirmation.

## **8.0 NEXT STEPS ON THE RAWs**

8.1 The RaWS' objectives and aims as regards the circular economy, carbon reduction, improvement of recycle quality and the reduction of waste cannot be argued against. However, how an authority achieves the Strategy's objectives should be a matter for local choice and best reflect local circumstances rather than be specified centrally.

8.2 The comments very recently made by Defra (section 2.3 above) do suggest a less strict approach to implementation, but this cannot be considered certain until further official announcements are made during 2022. The Government's preferred waste collection and treatment option, if implemented across the GMCA, would increase costs, increase the number of vehicles running on Greater Manchester's roads (with the accompanying increase in staff), require the development of new and/or expanded facilities and potentially increased risk with very little benefit in terms of recycling performance. There is also little certainty of cost recovery in the absence of further details from Government.

8.3 For a key part of the Government's strategy – food waste – there is reliance on Anaerobic Digestion (AD) treatment capacity that is not available currently and no certainty of markets for the resulting digestate and no certainty of cost recovery for service changes made.

8.4 The GMCA has submitted its EPR, DRS and Consistency consultation responses. Government indicated that during Spring 2022 it 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 publication there will be further consultations on statutory guidance and minimum service standards during 2022.

- 8.5 Once this further information has been received and reviewed, 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.
- 8.6 On the biowaste fraction of our waste – 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 in relation to the legal requirement for weekly food waste collection. There is very little treatment capacity in the Northwest for biowaste so we will need to consider a wide range of options for securing capacity for our material.
- 8.7 The Waste and Resources team have developed a work programme for the next 18 months that will generate the information required to inform how GMCA responds to RaWS. This work programme will involve:

Assessing the impacts of the RaWS through:

- a. developing our own household waste management strategy to accommodate its aims, objectives and obligations.
  - b. develop the TEEP assessment for our services; and/or
  - c. develop an implementation plan in discussion with the districts for changes to services to reflect changed obligations.
  - d. modelling implications of future housing and population growth and waste management services; and
  - e. develop a biowaste management strategy to identify our contracting and/or infrastructure development strategy for this waste stream.
- 8.8 As further information is released from Government and assessed, a series of update reports will be progressed through the GMCA governance structures to inform the long-term strategic decisions that will be required for waste management as a result of the RaWS.