

**Housing, Planning and Environment Overview and Scrutiny Committee**

Date: 23<sup>rd</sup> September 2019

Subject: Household Waste Recycling Centre Access Policy

Report of: Eamonn Boylan, Portfolio Lead Chief Executive for Green Cities

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**PURPOSE OF REPORT**

This report sets out the current measures that are used to deter trade waste abuse at the Household Waste Recycling Centres (HWRCs), provides details of schemes in operation elsewhere and proposes a policy for enhanced measures and a timetable for implementation.

**RECOMMENDATIONS:**

- a) Note the proposed approach set out at sections 4.0 and 5.0.

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Risk Management – see paragraph 8.0

Legal Considerations – see paragraph 6.0

Financial Consequences – Revenue – see paragraph 7.0

Financial Consequences – Capital – N/A

Number of attachments included in the report: 4

**BACKGROUND PAPERS:**

<b>TRACKING/PROCESS</b>		
Does this report relate to a major strategic decision, as set out in the GMCA Constitution		Yes / <del>No</del>
<b>EXEMPTION FROM CALL IN</b>		
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?		
TfGMC	Overview & Scrutiny Committee	
	12 September 2019	

## **1.0 INTRODUCTION**

- 1.1 As part of the contract specification for Lots 1 and 2 in the recent GM waste procurement, GMCA stipulated that the successful contractor must have robust trade waste prevention measures in place at the Household Waste Recycling Centers (HWRCs). This is in response to the apparent levels of trade waste inputs being received across the Household Waste Recycling Centre (HWRC) network which is increasing tonnages received and pushing up costs. Trade waste should not be deposited at these sites, the traders should be complying with their legal obligations and duty of care and paying for disposal. The level of trade throughputs cannot be quantified in tonnage terms as none of the sites have weighbridges for recording incoming vehicle weights. However, visual checks on the number of small vans as well as use of Automatic Number Plate Recognition (ANPR) systems to track repeat visitors indicates that there is abuse occurring on a regular basis that is estimated equate to c. 10% of the 300 ktpa throughput across the network of sites.
- 1.2 In order to address this level of input, as well as the Lot 1 and Lot 2 contractor control measures proposed by Suez Recycling and Recovery UK (Suez), GMCA will require a set of policy measures to support Suez and access control measures. This report sets out the background to existing arrangements, examples of local authority arrangements in operation elsewhere and proposals for control measures at GMCA sites to be operated by Suez.
- 1.3 It should also be noted that GMCA is now in the minority amongst local authorities with most others that operate HWRCs having access restrictions in place to control trade waste. All of the neighboring authorities (Lancashire, Derbyshire, West Yorkshire, Merseyside, Cheshire East and Wigan) have permit schemes in place that restrict access for vans, trailers and other commercial type vehicles. The absence of a scheme in Greater Manchester will currently be contributing to movement of trade waste into the GMCA sites from these neighboring areas and therefore needs to be addressed.

## **2.0 CURRENT ARRANGEMENTS AND CONTRACT REQUIREMENTS**

- 2.1 If commercial waste is allowed to enter HWRC sites it can cause a number of problems including:
- congestion on site, which may deter other site users;
  - difficulties of segregating commercial and household waste, and associated reporting;
  - additional service vehicles being required on site;
  - the costs of additional disposal;
  - effects on the morale of site staff if they know abuse is taking place and they are not supported in taking preventative action; and
  - commercial waste not being segregated into different recyclable streams, thereby affecting the recycling rate of the affected HWRC facility.

2.2 The current access controls at the 20 HWRCs in Greater Manchester only restrict by vehicle height through the use of a 2 metre height barrier at the entrance and exit to each site and no restrictions on trailers. This means that all small vans and even twin axle trailers can use the sites. Any vehicle which cannot access the sites due to the height restriction is redirected to a main weighbridge site where the vehicle can tip off subject to confirmation that it is carrying household waste. In order to establish the category of waste being carried is from domestic householder sources, there is a requirement for drivers of over height vehicles to produce documents at the weighbridge, either a Council Tax Bill or recent utility bill relating to the property where the waste is from, and to declare the materials have not been produced from commercial activity. In addition to the above, residents using hired vehicles need to produce the hire agreement document. ANPR records are used to track repeat visitors and challenge the nature of the waste being delivered. In these instances, site users are requested to sign a Disclaimer document to declare that their waste is from a domestic household source and not the product of any commercial activity.

2.3 There are a number of key requirements in the Lot 1 and Lot 2 contract specifications that will require Suez to develop and implement appropriate trade waste control measures at the HWRCs. These include:

- The Contractor shall ensure that the first experience of each Service User at a WRMS HWRC shall be pro-active and helpful 'meet and greet' assistance by a member of the WRMS HWRC staff in respect of which the Contractor shall ensure that:
  - each Service User is a resident of the Administrative Area (ie Greater Manchester). If this is not the case, then the driver of the vehicle shall be redirected to similar sites operated by the local authority in which they are resident;
  - Trade Waste does not enter the WRMS HWRC and, to the extent that it comprises Allowable Trade Waste, is redirected to an appropriate Reception Point;
  - each Service User discloses the nature of Waste they have brought to the WRMS HWRC;
  - Waste that cannot be accepted at the WRMS HWRC is identified and the Service User re-directed to an appropriate facility or service; and
  - each Service User is directed to the appropriate area of the WRMS HWRC and receptacles for the Contract Waste and items of Contract Waste they brought to the WRMS HWRC.
- The Contractor will be responsible for the operation of vehicle access restrictions in accordance with the Authority's Policies in order to prevent the deposit of Trade Waste at WRMS HWRCs, all in accordance with the HWRC Plan.
- The Contractor shall operate the WRMS HWRCs using the ANPR system and CCTV to enable the logging and recording of all Service User and all other vehicles and linking the vehicle registration to an electronic register of the delivered loads.

- The delivery of proactive measures and assistance by WRMS HWRC staff to encourage and promote Service Users to place Contract Waste or items of Contract Waste in the correct receptacle to facilitate (in order of priority) Re-use, Recycling, Composting, Beneficial Use in priority to the generation of Residual Waste, and energy Recovery and other diversion from Landfill in priority to Landfill.

### **3.0 ACCESS CONTROL EXAMPLE SCHEMES**

- 3.1 Many other local authorities operate sites with enhanced commercial waste control measures in place. A number of examples are set out at Appendix A.
- 3.2 Most of the approaches taken elsewhere involve the use of some form of permit scheme to limit access by certain vehicle types and to restrict access to residents of the administrative area of the local authority. Based on discussion with officers, all schemes reported no increase in flytipping in the vicinity of sites once these schemes had been introduced. In all of the examples in Appendix A where permit schemes are operated, the number of sites, annual tonnage throughputs and number of households in the administrative area are all significantly lower than Greater Manchester. Developing a workable permit scheme for over 1 million households is likely to have significant administration costs and complexity and a permit scheme may therefore not be the right approach.
- 3.3 Ultimately, to control commercial waste inputs to the Greater Manchester HWRCs, an access restriction scheme will be required but this does not need to be based on a permit type scheme. The alternative approach proposed by Suez is based on use of ANPR to track specific vehicle visits against pre agreed limits.

### **4.0 SUEZ PROPOSALS**

- 4.1 In accordance with the Lot1 and Lot 2 contract Specifications, Suez will introduce a meet and greet process at the HWRCs. All Suez site staff will have customer service training. The meet and greet operatives will undertake regular random resident checks, recording postcodes of site users who are delivering waste into the HWRCs. The meet and greet operative may also ask further questions if they have any suspicions regarding the source of the material delivered.
- 4.2 Site users may be asked to sign a disclaimer that the waste they are delivering is from their household. This would then be reported to GMCA and tracked and recorded on a site by site basis. Suez will train site staff to challenge any suspicious activity in a competent and professional manner. Suez will operate HWRCs using the ANPR system and CCTV to enable the logging and recording of all vehicles and linking the vehicle registration to an electronic register of the delivered loads. Suez will utilise ANPR data and interrogate it to highlight the top 30 offenders for accessing the HWRCs. When trade waste is turned away from a HWRC, SUEZ will use data from the ANPR system to relay information in real time on to other HWRCs and reception points.

4.3 Suez will install and use electronic display boards that will supplement the already installed ANPR system, with the boards displaying registration numbers and vehicle authorisation. Suez will install the electronic display boards within the first 3 months of the contracts. The ANPR system (and CCTV systems) will be monitored by staff located at the Higher Swan Lane site in Bolton. The system will record all site users visiting the HWRC. The system will record these records on the ANPR database. The data base will be able to track and record the numbers of visits by any vehicle. The database will have three differing vehicle statuses on the system:

1. "Green list"- these are vehicles that are not flagged for investigation and have not exceeded any threshold levels of visits to any of the HWRCMS HWRC sites. No additional action would be taken in this event;
2. "Amber List. These are vehicles which have reached threshold levels of numbers of site visit or where indications have been made by site staff of reasonable suspicions that the vehicle may be carrying potential trade waste (for instance if multiple disclaimers have been issue previously).These will be subject to challenge/ investigation; and
3. "Red"- these are vehicles that have been identified as Traders or who have exceeded the thresholds and are now to be treated as Allowable Trade waste or redirected to a 3rd party facility.

4.4 In summary the proposed threshold levels are:

- Cars and cars with single axle trailers – threshold level of 52 visits per year;
- Cars with twin axle trailers and all vans and pick up trucks to be considered as trigger vehicles and subject to enhanced checks; and
- Proposed Trigger vehicle visit thresholds:
  - Up to 3.5t gross vehicle weight – 18 visits per year
  - Above 3.5t gross vehicle weight – 12 visits per year
  - Car plus double axle trailer – 18 visits per year
  - All trigger vehicles limited to no more than 5 bags of rubble per visit.

4.5 The public will not have to apply for a permit, and the Suez IT system (through the ANPR database) will count the number of visits per vehicle. The display boards on site will flag vehicles that have reached 10 visits in a month and site staff would distribute leaflets to the drive making them aware of the access restrictions and controls. Any further visits by these vehicles would then be subject to additional checks and if they were determined to not be bringing household waste, would either be classed as chargeable trade waste or be refused access and redirected away from the HWRC site.

- 4.6 Suez will allow a maximum of five bags of rubble to be delivered by members of the public per visit. This would be recorded on site through PDA or Smartphone technology. Any member of the public requiring more than the five bags of rubble would be redirected to the nearest chargeable trade waste reception point and charged for this material. Plasterboard and asbestos will still be received at the main reception sites only and not on the HWRCs.
- 4.7 Suez will work with GMCA and the WCAs to help promote a consistent message regarding fly-tipping across relevant media, including websites and via printed material. Suez will also encourage and facilitate multi agency checks on suspected traders and their vehicles at the HWRC sites. Appendix B sets out a flow chart of the proposed process to check site users and identify potential traders.

## **5.0 GMCA HWRC ACCESS POLICY**

5.1 Any access scheme will need to be supported by a number of other policy measures. These will include:

- Parking restrictions being introduced on the public highway in the vicinity of HWRC sites to reduce the ability for traders to park outside and walk waste in. This will need to be implemented by the relevant highways authority in each locality;
- Rebranding of the sites to give greater emphasis to recycling and reuse eg Community Recycling and Resource Centres;
- Review of the half tonne minimum charge for commercial waste delivered to weighbridge sites, once the access restriction scheme has been in operation for a period of 6 months;
- The above measure will need to be accompanied by awareness raising amongst commercial companies of their duty of care obligations for waste disposal and alternate available disposal facilities using the Environment Agency website and Dsposal website (<https://dsposal.uk>);
- Enhanced security measures for staff including the use of body cams and CCTV along with additional training on customer care and managing aggressive behavior;
- Continued use of the commercial waste disclaimer and follow up actions with suspected traders until the scheme is fully implemented; and
- Development of an enforcement approach for repeat offenders and for any fly tipping activity in the vicinity of the HWRC sites.

5.2 The following key principles are required to underpin the access policy:

1. The access restrictions will apply consistently to all GMCA HWRC sites;

2. Access to HWRCs is for Greater Manchester (excluding Wigan) residents only;
3. ANPR and CCTV will be used to identify suspect behaviour and potential commercial waste inputs;
4. On a balance of evidence basis, if commercial waste abuse is suspected vehicles will be banned from further access to sites. Individuals that are residents of Greater Manchester will not be banned (only the vehicle) as they have a right to continue to deposit household waste (see also note 5 below);
5. Anyone using a hire vehicle will need to produce a copy of the hire agreement and the waste will be inspected to confirm it is household waste. Any individual repeatedly delivering suspected commercial waste in hired vehicles or other vehicles will be banned from site regardless of residency if it is proven on the balance of evidence that they are disposing of commercial waste;
6. Violent and abusive behaviour by site users towards staff will be not be tolerated and will result in individuals being banned from accessing sites;
7. Details of suspected commercial waste inputs and sources will be shared with the Environment Agency and other relevant authorities; and
8. Districts will need to commit resources to support these measures for example through parking restrictions being introduced in the vicinity of sites, investigating any fly tipping adjacent to sites and participating in multi agency enforcement events at sites to target suspected commercial waste operators. An example of this kind of multi agency approach that has implemented with Tameside is set out at Appendix C.

5.3 The decision to implement a HWRC access restriction scheme will be a key decision under the GMCA constitution. This will require the decision to be progressed through the appropriate governance process including overview and scrutiny. The proposed timetable is set out below:

<b>Phase</b>	<b>Suez</b>	<b>GMCA</b>
1. Mar 19 to June 19	Develop ICT system specification	Finalise scheme with PB(s)
2. July 19 to Sept 19	Recruit additional HWRC staff Build and test ICT system Training of HWRC operatives	Waste and Recycling Committee July 19  Housing Planning and Environment Overview and Scrutiny Committee Sept 19  GMCA decision Sept 19



3. Sept 19 to Dec 19	<p>Advertise legal requirement on waste producers</p> <p>Advertise introduction of access restriction scheme</p> <p>Continued advertising of incoming access restriction scheme</p>	<p>Publication of data on trade waste inputs and cost impact</p> <p>Advertise introduction of access restriction scheme</p>
4. Jan 20	Launch access restriction scheme	Launch access restriction scheme
5. Feb 20 onwards	<p>Enforce access restriction scheme</p> <p>6 monthly reminders in local papers/social media alternating with GMCA reminders</p>	<p>Publish annual review of system</p> <p>6 monthly reminders in local papers/social media</p>

5.4 It is proposed that a task and finish group composed of WCA waste officers and GMCA officers be established to agree the communication strategy and also to monitor the effectiveness of the scheme with reviews scheduled for 6 months and 12 months after the implementation date. A draft communication plan is set out at Appendix D.

## 6.0 LEGAL

6.1 HWRCs are provided for the deposit of household waste by householders in the administrative area. Under the Environmental Protection Act 1990 (EPA 1990), commercial waste must be disposed of at appropriately permitted facilities for a reasonable charge and anyone transporting such waste is subject to the requirements of duty of care (set out at section 34 of the EPA 1990).

6.2 The proposals set out in sections 4.0 and 5.0 of this report will assist in ensuring that illegal deposits of commercial waste are restricted and controlled.

## 7.0 FINANCIAL

7.1 Commercial waste inputs to HWRCs increase the running costs of the facilities and also constrains the ability of the operator to achieve high recycling rates due to increased waste throughputs and volumes of traffic. Failure to achieve the recycling rate will increase costs of landfill disposal or energy from waste recovery.

7.2 The Suez contract commitments in relation to HWRC recycling performance are based on trade waste access control measures being in place. In the event that a scheme to control

trade waste deposit at HWRCs is not agreed then financial consequences will flow through increased disposal costs and loss of recycle revenues. As an indication, if recycling performance at the HWRCs did not reach the 60% target level due to lack of trade waste control measures, c.£3m per annum additional cost would result from each 5% reduction in performance below the target level.

## **8.0 RISKS**

8.1 There are a number of potential risks associated with the introduction of an HWRC access restriction scheme:

- Reputation – in the early stages of the scheme, complaints will increase as commercial operators are challenged and turned away from sites. A clear communications programme will require implementation well in advance of the scheme commencement, combined with new arrangements for charging for commercial waste. A draft communications programme is set out at Appendix D. GMCA will need to ensure that the complaints handling procedure is appropriately implemented and resourced;
- Staff safety and resilience – site staff will be placed in potentially confrontational and abusive situations. The success of any such scheme will to a certain extent rest on the diligence of the site operatives for implementation and enforcement. Staff will therefore need to be demonstrably supported by the contractor and GMCA through clear enforcement policies, training, use of body cams and training with any site users that use abusive or threatening behavior towards staff being banned from site; and
- Flytipping in the vicinity of HWRCs – there is a risk of increased flytipping if commercial operators are turned away from an HWRC. This is likely to only be from a small minority, flytipping is a serious offence and most individuals will not escalate from free tipping at an HWRC to flytipping. Support will be required from districts in monitoring the areas around the HWRCs post scheme introduction and then investigation and enforcement activity will be required. Information on suspected traders and offenders will be shared with the Environment Agency for investigation.

8.2 As set out in paragraph 3.2 previously, all other authorities contacted that have implemented access control schemes stated that they did not record an increase in flytipping activity as a result of introducing the controls.

8.3 The Waste and Resources Action Programme (WRAP) recently undertook a study of 55 local authorities that operate trade waste control measures at their HWRCs. The results of the study were reported at the Local Authority Recycling Advisory Committee (LARAC) National Civic Amenity Site conference in June 2019. Only 4 authorities reported an increase in flytipping in their areas with the increases being in line with national trends.

- 8.4 Further details from 2 schemes were also reported at the conference and these provide data on the implementation. West Sussex operate 11 HWRCs and implemented an access control scheme in 2018. Over the first 10 months of the scheme, they received 52 compliments, 307 enquiries, 28 complaints and one referral to the Local Government Ombudsman (LGO). Cheshire West and Chester operate 7 HWRCs and introduced an ANPR scheme similar to that proposed by Suez for the GMCA sites in 2018. This scheme is reported as delivering a 13% reduction in residual waste throughputs at the sites. In the region of 20,000 waste declaration forms (similar to the disclaimer used by GMCA) were completed in the first year, 6 Fixed Penalty Notices (FPNs) were issued and 25 individuals restricted from accessing the sites.
- 8.5 For all schemes introduced, a number of key lessons learnt have been identified that facilitate successful implementation:
- Clear communication plans;
  - High levels of engagement by staff at the entrance to the site;
  - Training and support of site staff;
  - Clean and consistent application of scheme rules;
  - Clear instruction on site;
  - Robust approach to implementation and enforcement;
  - Training and information provision for businesses in relation to their obligations for waste disposal;
  - Information sharing with other agencies; and
  - Joint approach to enforcement.
- 8.6 All of these principles will be incorporated into the GMCA scheme and built in to the communications plan and operational delivery.

## Appendix A – Examples of Permit Schemes Operated by Other Local Authorities

West Sussex County Council (WSSCC) introduced a requirement for a permit for certain vehicles from October 2018. A permit must be applied for online to WSSCC and can only be for an address in West Sussex. The permit can be printed at home or issued by WSSCC. Photo ID to confirm residency may also be required on entry to the site. Some vehicles are being banned completely including box vans, twin axle trailers, tippers and horse boxes. In addition, two of the smaller sites will ban the use of any trailer, i.e. trailers will need to use other sites. Full details can be found at:

<https://www.westsussex.gov.uk/land-waste-and-housing/waste-and-recycling/van-pickup-and-trailer-waste-permit/>

Somerset County Council (SCC) via the Somerset Waste Partnership operates a permit system for a range of vehicles including vans, pick-ups and trailers. These are applied for on-line and are only available to Somerset residents. A number of vehicle types are banned including vans with trailers, twin axle trailers, box vans, horse boxes and tippers. SWP go further and charge for some waste streams including asbestos & plasterboard, gas bottles, soil & hardcore (greater than a single carrier bag) and tyres. Further details can be found at:

<https://www.somersetwaste.gov.uk/apply-for-a-permit/>

London Borough of Sutton (LBS) operate a system whereby all vehicles require a permit. Permits are issued on each HWRC site on production of two forms of photo identification that includes proof of residency, with only LBS residents able to receive a permit. Vans and trailers are not permitted to use sites on Sundays and Bank Holidays. Further details can be found at:

[https://www.sutton.gov.uk/info/200449/waste\\_and\\_recycling/1147/reuse\\_and\\_recycle\\_centre\\_rrc/2](https://www.sutton.gov.uk/info/200449/waste_and_recycling/1147/reuse_and_recycle_centre_rrc/2)

Barnsley Council operate a permit scheme for all vehicles accessing the HWRCs where photo identification with a Barnsley address is required to access the sites. Vans require a special permit. Car permits can be obtained at the HWRCs on production of a V5. The permit is a window sticker that must be clearly displayed. Van permits entitle the recipient to a maximum of 12 visits per year. Further details are available at:

<https://www.barnsley.gov.uk/services/bins-rubbish-and-recycling/permits-for-waste-and-recycling-centres/>

Telford & Wrekin Council operate a scheme whereby only specified vehicles require a permit (any vehicle with a trailer, 4x4 with no rear windows/seats, pick up trucks, vans). The permit is issued to the householder rather than the vehicle and permits allow up to 10 visits per year. Staff on site have access to an electronic system showing who has a permit and how many visits they have remaining. A member of the public visiting with a vehicle requiring a

permit has to show their driving licence as proof of address which the site operatives check against their electronic system. Members of the public can check how many visits are left on their permit by logging into their account on the Council website. Further details are available at:

[http://www.telford.gov.uk/info/20380/household\\_recycling\\_centres\\_hrcs\\_and\\_e-permits/3399/e-permits](http://www.telford.gov.uk/info/20380/household_recycling_centres_hrcs_and_e-permits/3399/e-permits)

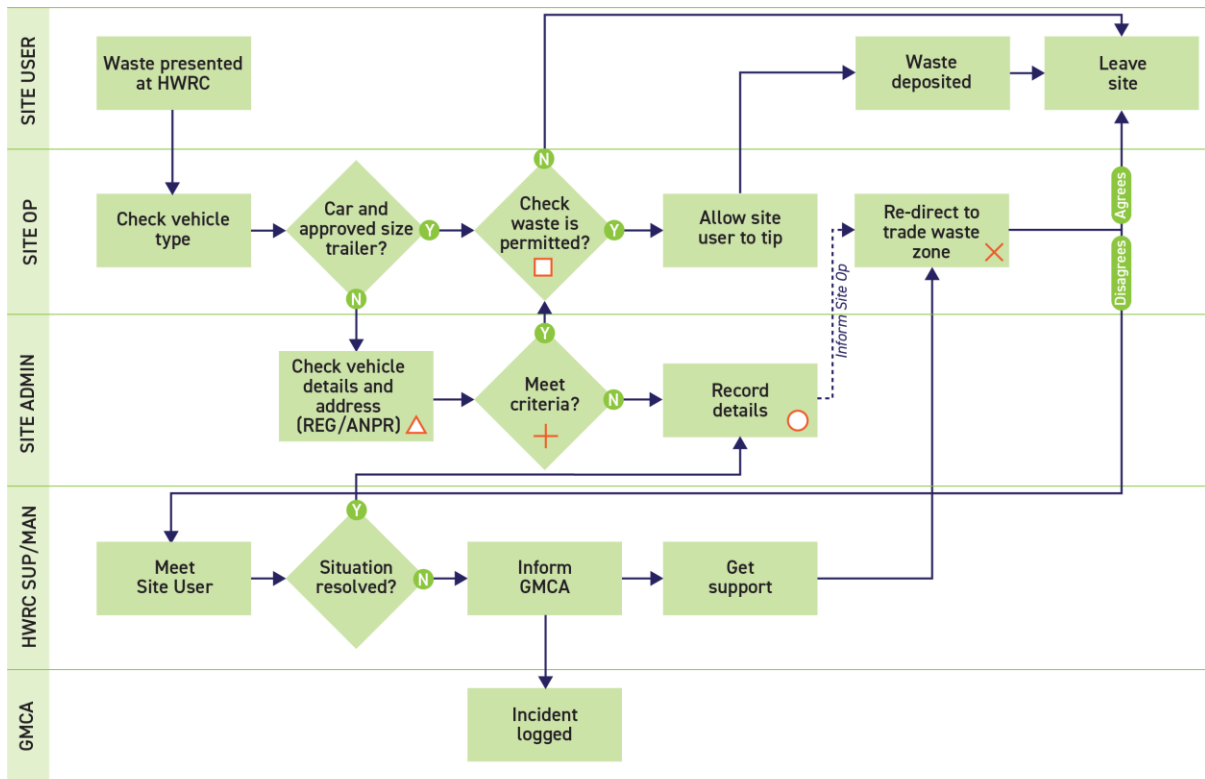
Kirklees Council operate a scheme that requires all vehicles accessing sites to have a permit and up to 2 vehicles per household can be registered. This is an electronic system with site staff checking vehicle registrations against an electronic register on arrival at the site. Certain vehicle types are banned including box vans, pickups and horse boxes. Certain waste types are also not accepted including rubble, hardcore, ceramics, soil and turf. Further details are available at:

<http://www.kirklees.gov.uk/beta/your-property-bins-recycling/household-waste-recycling-centres.aspx>

Cumbria County Council operate a permit scheme for vans and trailers with permits only issued to residents. CCTV is used to monitor site activity and any aggressive situations. Banning individuals from site is used as a last resort for continued commercial waste abuse. Cumbria operate 14 sites with total throughput of c.60ktpa. The stated cost for administering the permit scheme was £160kpa with 2.5 FTE staff responsible for this. Further details are available at:

<https://www.cumbria.gov.uk/planning-environment/waste-management/permitscheme/default.asp>

## Appendix B – Proposed Trade Waste Control System



### KEY

- Waste is listed as Permitted in EA Permit.
- △ Checks include: Proof of address (utility bill); vehicle registration; number of visits (ANPR); listed on trade schemes; on watch list?; previous bans/issues?
- + Check all △ items to make informed decision.
- Record all key info: Day, date, time, registration, site user name, company name, waste types presented, any behaviour problems/staff problems. Also inform other HWRCs in the area ASAP.
- × Explain why waste cannot be accepted. Link to either GMCA controls/SUEZ user rules. Give details of how and where SUEZ can accept the waste as 'Trade Waste'.
- Activity/ Task.
- ◆ Decision/ Question.
- Direction of flow.

### SUEZ PROPOSALS

- Only cars (including 4x4s) with single axle trailer approved\*.
  - No limits on usage for these.
- Cars using larger trailers considered as 3.5t and above vans and subject to controls → 'Trigger Vehicles'
- All Trigger Vehicles subject to △ checks
- All Trigger Vehicles limited to below usage (subject to passing checks):
  - 3.5t: Max 18 visits/year free of charge (considered household waste)
  - Larger than 3.5t: Max 12 visits/year free of charge
  - Car and double axle trailer: 18 visits/year free of charge
  - All Trigger Vehicles limited to 5 x bags of rubble per visit. Site User to provide bags.

\* Unrestricted

## **Appendix C – Joint Enforcement Team Example**

A multi agency event was carried out in March 2018 and involved officers from Tameside Licensing and Enforcement Team, GMCA Waste and Resources team, Greater Manchester Police, the Environment Agency and the Vehicle and Operator Services Agency (VOSA).

This involved stopping suspected trade vehicles on the road network around the Ash Rd HWRC, Droylsden and the Bayley Street HWRC, Stalybridge.

During the course of the day 14 vehicle stops were carried out resulting in 4 follow up actions by the Environment Agency due to lack of compliance with Duty of Care requirements. Four fixed penalty notices (FPNs) were also issued for vehicles being overweight and for various vehicle faults.

One vehicle was found to be stolen and was carrying a stolen mini digger. The driver was also found to be disqualified from driving and was remanded in custody.

## **Appendix D – Draft Communications Plan**

### **Household Waste Recycling Centre Access Restrictions**

#### **Communications Plan September 2019**

##### **Executive Summary**

There are 20 household waste recycling centres (HWRCs) located across Greater Manchester, which are free to use for residents living in any of the nine out of the 10 Greater Manchester boroughs (excluding Wigan). The sites are only closed on Christmas Day and New Year's Day, sites are open on all other bank holidays.

Trade waste is not permitted and although fixed height barriers have been installed at all sites set at 2 metres high to prevent traders from entering sites, evidence suggests that a large amount of trade waste is being deposited at the sites unlawfully.

All businesses must pay for the disposal of trade waste; the HWRCs are for household waste only. Under the Environmental Protection Act 1990 (EPA 1990), trade waste must be disposed of at appropriately permitted facilities for a reasonable charge and anyone transporting such waste is subject to the requirements of duty of care (set out at section 34 of the EPA 1990).

If trade waste is allowed to enter HWRC sites, it can cause a number of problems;

- congestion on site, which may deter other site users;
- difficulties of segregating trade and household waste, and associated reporting;
- the costs of additional waste disposal as trade waste tends to mixed unsorted waste;
- effects on the morale of site staff if they know abuse is taking place and they are not supported in taking preventative action; and
- trade waste not being segregated into different recyclable streams, thereby affecting the recycling rate of the affected HWRC facility.

Trade waste inputs to HWRCs increase the running costs of the facilities and constrains the ability of the contractor to achieve high recycling rates due to increased waste throughputs and volumes of traffic. Failure to achieve the recycling rate will increase costs of landfill disposal or energy from waste recovery.

ANPR data shows that sites are generally busy, whilst the network average is around 800 visits per site per day; the busiest sites receive over 1,000 visits most days.





Waste compositional analysis data carried out at the HWRCs indicates that of the waste deposited in the general waste container, on average 18% is black bag waste, which contains 58% of items that could have been recycled.

The purpose of the proposed access policy is to restrict traders from using HWRCs in order to reduce the operating costs, increase recycling and provide an improved service for residents. In addition, the policy will provide guidance to traders to ensure they are being responsible businesses. Recently a new page was created on the Recycle for Greater Manchester website regarding how to dispose of business waste. From April to July 2019, the page received over 2,000 hits demonstrating that traders are seeking information and advice.



This compares to a new page about plastic waste, which received 1,500 hits over the same period despite extensive media coverage about plastic.

In summary the proposed threshold levels are:

Type of vehicle		No of visits per year
	Cars and cars with single axle trailers	52
	Cars with a double axel trailer	18
	Vehicles up to 3.5 tonne gross vehicle weight	18
	Vehicle above 3.5 tonne gross vehicle weight	12

In addition, all vehicles will be limited to no more than five bags of rubble per visit.

The number of visits will be monitored by ANPR and CCTV cameras on site and these will be linked to a central system at the SUEZ regional office in Bolton. Digital display boards at each HWRC will show the number of visits a vehicle has made each month.

### Objectives

- To communicate the HWRC access restrictions to traders to prevent them from using the HWRCs unlawfully;
- To raise awareness of traders duty of care to ensure they understand how to dispose of their waste via commercial weighbridges or by setting up a commercial collection;
- To raise awareness of a householder's duty of care to ensure they understand their responsibility to dispose of household waste appropriately and to ensure that any

waste generated by tradesmen undertaking work for the householder at their property is also disposed of appropriately and not at the HWRCs;

- To run a Greater Manchester wide fly tipping campaign to target fly tipping hotspots and to reinforce traders and householders duty of care; and
- To communicate HWRC access restrictions to residents to encourage them to use the sites for the disposal of correctly sorted household waste and recycling, thereby increasing recycling and reducing contamination of recycling and waste containers.

### **Key messages for Traders**

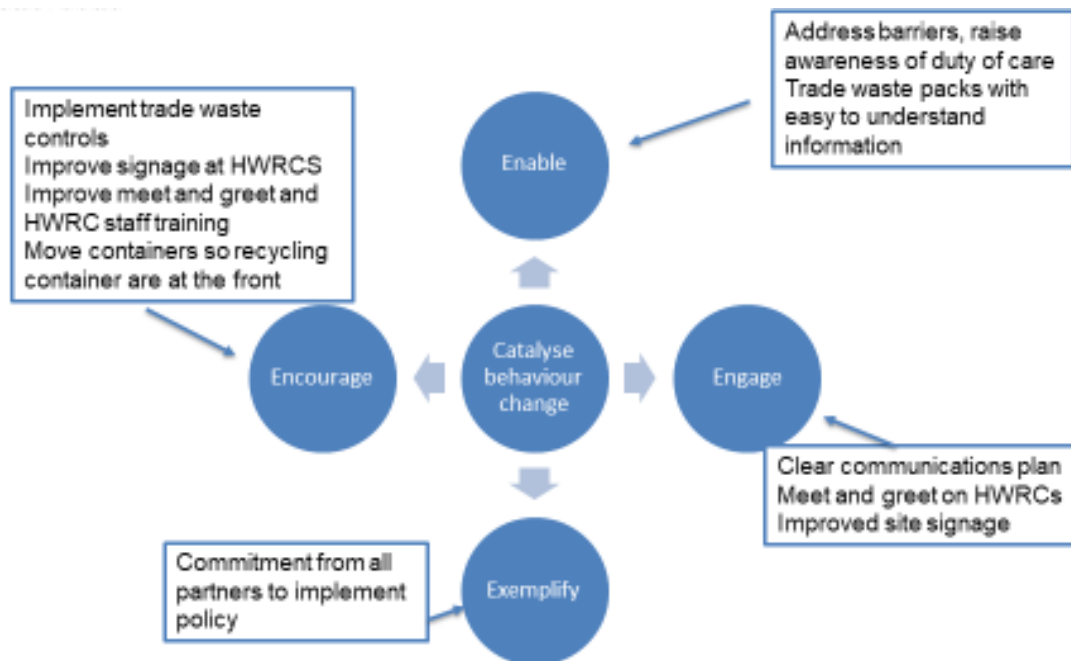
- HWRCs are for the use of Greater Manchester residents only (excluding Wigan);
- As a trader you have a responsibility to dispose of your waste either by taking it to a commercial weighbridge where you will be charged, or by setting up a commercial waste collection service which is chargeable or by paying for a skip;
- This applies to all traders and businesses no matter how large or small;
- If you carry waste from your business, you must be registered with the Environment Agency and have a waste carriers licence, (lower tier waste carriers licences are free); and
- If you carry out building work for a householder, you must remove the waste you produce and include the charge for waste disposal in the job and pay for disposal at a suitable permitted facility, not via the HWRCs.

### **Key Messages for Residents**

- HWRCs are free to use for Greater Manchester residents only (excluding Wigan);
- For the majority of householders in a standard car, you will be restricted to one visit per week on average regardless of which site you use. This rule applies even if you use different HWRCs;
- Separate your waste before you visit to make it easier to recycle. This helps us to keep costs down and operate the site more efficiently maintaining the service for all residents;
- You can recycle approximately 40 different types of waste items at the HWRCs including electrical items, batteries, wood, lightbulbs, cardboard etc;
- If you are recycling rubble, you will only be allowed to bring 5 bags per visit; and
- Understand your duty of care - If you have building work done on your house by a professional trader, they are responsible for removing the waste and they will charge you accordingly.

### **Behaviour Change**

Below are the key steps in a behaviour change campaign



All residents and traders will have different motivations to change their behaviour based on their own knowledge, behaviours, attitudes, habits and routine. The campaign will take this into account by developing a range of different messaging and using social norming techniques to encourage behaviour change. Segmentation data identifies six segments in Greater Manchester, which are:

Segment 1: What's in it for me?;

Segment 2: Nice and neighbourly;

Segment 3: Community conscientious;

Segment 4: Rule abiders;

Segment 5: Global ideals;

Segment 6: Indifferent; and

Segment 2 residents will recycle because they care about their local area, segment 4 do it because they like to follow the rules and separate their waste correctly.

Each person in Greater Manchester will fall into one of these segments. This provides us insight into common motivations for changing behaviour, which will be used to develop the messaging.

## Actions

Activity	Date	Comments
<b>Target Audience - Traders</b>		
Produce trade waste pack to advise traders of their duty of care which can be given out at HWRC	September 2019	
Update R4GM website business waste pages to provide clear information on traders duty of care	Sep 2019	
Run joint awareness raising campaign with key stakeholders to advise traders of their duty of care	Oct 2019	Key stakeholders include Suez, Local council enforcement officers, Business Growth Hub, Chamber of Commerce, Dsposal
Implement fly tipping campaign (Lets Scrap Fly-tipping) with local councils and partners	Jan 2020	Hertfordshire CC have developed a toolkit of resources available for use by any local authority to use. More details below.*
<b>Target Audience - Residents</b>		
Implement customer service training to Suez HWRC staff at all staff	Start September 2019	Suez are recruiting additional HWRC staff per site
Produce leaflet to be handed out at HWRC site to explain residents duty of care, new restrictions and how to use the HWRC to recycle as much of their waste as possible	Jan 2020	
Install community noticeboards displaying the recycling rate for each site	Sep 2019	Recycling rate will be shown for each site on the R4GM website and social media will be used to thank residents for recycling
Update R4GM website with clear guidance on the restriction policy, explain why the restrictions have been introduced.	Jan 2020	
Produce a video explaining how to use the HWRC, including top tips, plan your visit, and separate your waste before your visit.	Jan 2020	

Carry out survey online and at site to ask residents how they rate their visit	Oct 2019/March 2020	This will be used as a way of monitoring customer feedback
Social media advertising to raise awareness of new restrictions.	Jan 2020	Social media toolkit will be provided to all councils
Advertising in local newspapers, council magazines, e-newsletter to promote the changes to the HWRCs	Jan-March 2020	
Press release to inform residents of the changes		
Rebrand HWRCs as Community Recycling Centres – update signage and website	Jan 2020	Rebranding HWRCs will help to define the sites as community sites for residents only. Trade waste is not permitted
Continue educational tours for schools and community groups	Ongoing	
<b>Stakeholder Engagement</b>		
Briefing note for all ward Councillors with a list of FAQs		
Briefing note for all call centre staff at councils, council officers		Standard response will be provided and residents will be directed to Suez to log complaints or queries
Briefing for GMCA waste and resources team and all Suez staff		
Internal communications for GMCA, Fire, TfGM and council staff		Many staff are also residents of Greater Manchester

### \*Let's Scrap Fly-tipping



The Hertfordshire Fly-tipping campaign toolkit has been designed by Hertfordshire Waste Partnership which include 11 local authorities, the Environment Agency, Police and Keep Britain Tidy. To date 63 local authorities across England and Wales have successfully implemented the campaign. The campaign has been designed so it can be used by any local authority. The pack of resources can be tailored by adding appropriate logos. Resources include:

- Householder leaflet;
- Social media toolkit;
- Banner for HWRC;
- Vehicle livery suitable for refuse collection vehicles and street cleansing vehicles;
- Adverts, posters;
- Template press release; and
- Warning stickers.

The campaign website is [www.hertfordshire.gov.uk/flytipping](http://www.hertfordshire.gov.uk/flytipping)

In addition, two videos have been produced below. These informational films cover small scale (possibly unintentional fly tipping) and can be tailored to a Greater Manchester wide campaign

<https://www.youtube.com/watch?v=dLGfUGVD8NU&feature=youtu.be>

<https://www.youtube.com/watch?v=1E8nQkOb3Eo&feature=youtu.be>

### Monitoring and Evaluation

The following KPIs will be monitored throughout the campaign:

- Recycling rate at each HWRC;
- Waste arisings at each HWRC;
- No of incidents of fly tipping;
- Number of traders identified and refused entry from HWRCs site;
- Number of complaints;
- Number of vehicles visiting each site; and
- Results of site and online customer survey.