

Waste and Recycling Committee

Date: 17 July 2024

Subject: Changes to MRF Recycling Sampling Requirements

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

Purpose of Report

To inform the Committee of changes to the sampling requirements for dry recycling resulting from a change in law and the impacts this will have on infrastructure and costs.

Recommendations:

The Committee is requested to:

1. Note the changes to the sampling of recycling required by the change and expansion in regulatory requirements.
2. Note proposals provided by Suez for compliance with the Regulations and the verbal update given.

Contact Officers

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Equalities Impact, Carbon and Sustainability Assessment:

Recommendation - Key points for decision-makers

To note the required changes and the proposals to ensure compliance with the updated Regulations.

Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation
Equality and Inclusion	G	
Health		
Resilience and Adaptation		
Housing		
Economy		
Mobility and Connectivity		
Carbon, Nature and Environment	G	The sampling will assist GMCA understand the quality of its recycling so that campaigns can be developed to increase its quality and reduce contamination.
Consumption and Production	G	It will help GMCA better understand the composition of its recycling to develop new campaigns to increase quantities and quality. Contriubtes towards better quality feedstocks to support the development of circular manufacturing. it will provide data on plastic packaging informing the wider sector.
Contribution to achieving the GM Carbon Neutral 2038 target		It will provide data to better understand quantity and quality of recycling. This will contribtue to the development of campaigns and iniatives to increase reuse and recycling with the associated carbon benefits.
Further Assessment(s):	N/A	
G Positive impacts overall, whether long or short term.	A Mix of positive and negative impacts. Trade-offs to consider.	R Mostly negative, with at least one positive aspect. Trade-offs to consider.
		RR Negative impacts overall.

Carbon Assessment

Buildings	Result	Justification/Mitigation
New Build residential	N/A	
Residential building(s) renovation/maintenance	N/A	
New build non-residential (including public) buildings	N/A	
Transport		
Active travel and public transport	N/A	
Roads, Parking and Vehicle Access	N/A	
Access to amenities	N/A	
Vehicle procurement	N/A	
Land Use		
Land use	N/A	
No associated carbon impacts expected.	High standard in terms of practice and awareness on carbon.	Mostly best practice with a good level of awareness on carbon.
		Partially meets best practice/ awareness, significant room to improve.
		Not best practice and/ or insufficient awareness of carbon impacts.

Risk Management

There is a risk of proceedings against GMCA and Suez for failing to implement the required changes. The proposals contained within this report (or any subsequent amendment) when implemented will ensure compliance.

Legal Considerations

The new sampling arrangements are a legal requirement so failing to implement the necessary changes could result in legal action.

Financial Consequences – Revenue

The increased requirements do add revenue costs to the delivery of services – these are estimated within the report.

Financial Consequences – Capital

The increased requirements will require the construction and installation of new capital plant and machinery – these estimates are detailed within the report.

Number of attachments to the report: None

Comments/recommendations from Overview & Scrutiny Committee

N/A

Background Papers

- [The Environmental Permitting \(England and Wales\) \(Amendment\) Regulations 2014 \(legislation.gov.uk\)](#)
- [Materials facilities: how to report on mixed waste sampling \(publishing.service.gov.uk\)](#)
- [The Environmental Permitting \(England and Wales\) \(Amendment\) Regulations 2023 \(legislation.gov.uk\)](#)
- [Materials facilities: waste sampling and reporting from October 2024 - GOV.UK \(www.gov.uk\)](#)

Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA's Constitution

No

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

N/A

Overview and Scrutiny Committee

N/A

1. Introduction/Background

In 2014 the Government introduced a legal requirement to sample the composition of recycling at sorting facilities that received more than 1,000 tonnes (t) per annum of two or more of paper/card, glass, metals and/or plastic. These requirements applied to GMCA's recycling so sampling infrastructure and procedures were put in place to comply at the Longley Lane Materials Recycling Facility (MRF).

The purpose of the requirements was to monitor the quality and composition of recycling delivered to facilities and to improve transparency in the supply chain. A Code of Practice was published to assist the sector to implement and manage the sampling process.

Following a review of the requirements the Government has introduced a strengthening of the sampling methodology and expansion in the range of materials to be sampled resulting in the need to fundamentally redesign our sampling infrastructure and procedures (as operated by our contractor Suez)

This report explains the new requirements, how Suez proposes to ensure compliance and the costs associated with compliance.

2. The Legal Requirements

In 2014 the Government published The Environmental Permitting (England and Wales) (Amendment) Regulations (the Regulations). For facilities such as GMCA's Longley Lane MRF receiving more than 1,000t per annum of two or more of paper/card, glass, metals and/or plastic this resulted in the need to develop the infrastructure to sort dry recycling. A sample had to be taken from every 160t of recycling delivered (this threshold was reduced in 2016 to 125t thereby increasing the number of samples required). Furthermore, sampling of output materials was also required – for glass a 10kg (kilograms) sample for every 50t produced, for metals a 10kg sample for every 20t produced, for plastic a 20kg sample for every 15t produced and paper a 50kg sample for every 60t produced.

The categories of information that had to be collected included:

- For inputs:
 - total weight in t received;
 - total number of samples;
 - total weight in kg of all samples;
 - average percentage composition of target glass, paper, metal and plastic;

- standard deviation of the average percentage composition of target materials; and
- average percentage composition levels of target materials, non target materials and non recyclable materials.
- For outputs:
 - total weight each output material;
 - total weight of residues;
 - total number of samples;
 - average percentage of target materials, non target and non recyclable; and
 - the standard deviation of the average percentage composition levels for the target materials found.

The following graphic shows how Suez applies the current Regulations:



For the output sampling:

All target material has dedicated sample extraction points around the mrf . Samples are extracted by the output sampler and placed into dedicated sample boxes



Output sample table. Target, non target items segregated and weighed



The data measurement and collection requirements for the 2014 Regulations are onerous and for GMCA this results in 3,466 samples being collected each year. The process uses three full time staff working Monday to Friday. The costs to GMCA are close to £136k (thousand) per annum.

The new Regulations strengthen the previous requirements increasing complexity (through adding new materials categories), widening the scope of waste reception points covered and increasing the sampling frequency requirements. In brief, the impacts for GMCA are:

- Widening of sources of input materials to include Household Waste Recycling Centre (HWRC) recyclable material coming into the transfer loading station (TLS) network and metals extracted from our residual waste mechanical treatment and recovery (MTR) processes;
- Addition of fibre-based composite materials (cartons for example);
- Increasing input sampling frequency from every 125t to every 75t;
- Samples to be categorised as target, non-target and non-recyclable materials, target, non-target and non-recyclable packaging and drinks containers;
- The separate identification of glass, aluminium, steel, paper, card, plastic bottles, plastics pots, tubs and trays, films and flexible plastics, fibre-based composite materials;

- Increased reporting requirements; and
- Any commercially sourced recyclable material received will require input sampling (regardless of the input tonnage per supplier).

3. Proposals for Achieving Compliance with the 2023 Regulations

Suez has estimated that the new Regulations will increase the sampling requirement for GM to 8,102 samples of household waste for analysis each year (and that excludes the sampling of any additional commercial waste collected by districts) – over twice as many. To comply with the new Regulations Suez has been assessing options and has presented an outline of the favoured approach to GMCA. In summary the proposal is:

- Install bespoke conveyor sampling system (effectively a mini-MRF) at the Longley mechanical treatment and recovery plant;
- Install one static conveyor system at the Every Street facility (for paper and card sampling); and
- Introduce a ‘collection round’ of samples from the various reception facilities for analysis at Longley Lane or Every Street.

This will require the purchase of equipment, the hire of the ‘collection round’ van and the recruitment of 19 members of staff. The Suez preferred option has been costed at £546k per annum for staff (an increase from 3 to 19), £1.5k per annum for equipment maintenance and a further £59k for capital equipment.

4. Next Steps

As this is a Change in Law under the WRMS Contract, GMCA is obliged to cover the cost of the new obligations and we will be challenging the Suez proposals to ensure they are compliant, robust and necessary. The existing Change Protocol in the WRMS Contract will be applied to introduce the required changes.

A verbal update will be provided at the Committee meeting on the development of the proposals.