

GM WASTE AND RECYCLING COMMITTEE

Date: 16th January 2020

Subject: Household Waste Recycling Centre Access Restrictions
Communications Plan - Part A

Report of: Michelle Whitfield, Head of Communications and Behavioural Change

PURPOSE OF REPORT

To provide the Committee with an overview of the communications plan for the implementation of the Access Restrictions Policy at the Household Waste Recycling Centres that will come into effect in February 2020 and an update on implementation.

RECOMMENDATIONS:

The Committee is requested to:

1. Note and comment on the communications plan.

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Report authors must identify which paragraph relating to the following issues

Equalities Implications – contained in the body of the report

Risk Management – contained in the body of the report

Legal Considerations – see paragraph 3

Financial Consequences – Revenue – see paragraph 4

Financial Consequences – Capital – not applicable

Number of attachments to the report: 1 Appendix A

BACKGROUND PAPERS:

HWRC Access Restrictions Policy Report to GMCA, September 2019

TRACKING/PROCESS		
Does this report relate to a major strategic decision, as set out in the GMCA Constitution		Yes / 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	Overview & Scrutiny Committee	
N/A	N/A	

1. INTRODUCTION

- 1.1 At the September 2019 meeting of the GMCA, the decision to implement access restrictions at the Household Waste Recycling Centres (HWRCs) was approved. The purpose of these restrictions is to deter trade waste abuse at the sites in order to improve recycling performance and drive down disposal costs.
- 1.2 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.
- 1.3 Following the decision to implement the policy, a communications plan has been developed with Suez to ensure that awareness of the changes on the sites is raised in advance of the 10th February 2020 implementation date. This plan is set out at Appendix A to this report.
- 1.4 The policy is based on the Suez proposals included in their tender submission that uses Automatic Number Plate Recognition (ANPR) to track individual vehicles against thresholds. The 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

2. IMPLEMENTATION

- 2.1 Suez have developed a full implementation plan for the roll out of the policy that sits alongside the communications plan. The ANPR boards are now installed at all sites and are undergoing testing and synchronisation with the operatives mobile phones.
- 2.2 Recruitment of additional HWRC staff is nearing completion with 50 roles filled at the beginning of December and recruitment underway for a further 14 roles. Training of

the new staff commenced in December and will then move onto customer service training in January.

- 2.3 A site by site review of potential parking restrictions in the vicinity of sites is being undertaken to determine whether additional off site controls are required. A number of sites are being targeted by traders parking off site and then walking or barrowing waste into the facilities. Data on this is being gathered and will be presented to a future meeting of the committee to determine whether additional control measures are required.

3. LEGAL

- 3.1 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).
- 3.2 The policy will assist in ensuring that illegal deposits of commercial waste are restricted and controlled.

4. FINANCIAL

- 4.1 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.
- 4.2 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 implemented then financial consequences will flow through increased disposal costs and loss of recycle revenues.

APPENDIX A

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 owned by the GMCA and operated by SUEZ as part of the Greater Manchester waste and resources contract. HWRCs are closed on Christmas Day and New Year's Day, sites are open on all other bank holidays. Opening hours are 8am to 6pm in the winter and 8am to 8pm in the summer, (except Salford Road, Bolton; where Sunday and Bank Holiday opening hours are 10-4pm). The 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.

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

All traders and businesses must pay for the disposal of trade/business 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 inhibits the achievement of high recycling rates due to increased waste throughputs and volumes of traffic. Failure to increase the recycling rate will increase costs of landfill disposal or energy from waste recovery. These costs are ultimately passed on to the council tax payers.

The 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.

The Access Restriction Policy

The access restriction policy will be introduced in early February 2020. The number of visits will be monitored by ANPR (Automatic Number Plate Recognition) and these will be linked to a central system at the SUEZ regional office in Bolton. Suspected traders, or vehicles reaching a trigger level, will be stopped and the load inspected. Suspected traders will be given

guidance to direct them to licenced trade waste facilities. Continued abuse of the facilities will result in the vehicle being banned from the site. The threshold levels are shown in the table:

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 (900mm x 600mm) of rubble per visit. This is designed to stop traders from using the sites for the illegal disposal of large quantities of rubble.

Communication Objectives

- To communicate the HWRC access restrictions to traders to prevent them from using the HWRCs illegally. The policy will be introduced in early February;
- To raise awareness of trader's duty of care obligations to ensure they understand how to dispose of their waste via commercial weighbridges or by setting up a commercial collection;
- To raise awareness of householders 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 reinforce traders and householders knowledge of 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 licenced trade waste facility with a 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 small;
- If you carry waste from your business, you must be registered with the Environment Agency and have a Waste Carriers licence; and
- If you carry out commercial 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, delivering domestic waste, only (excluding Wigan);
- For the majority of householders who visit in a standard car, you will have 52 visits per year. This is the total amount over the year even if you use different HWRCs. This level has been set deliberately high so that residents can continue to use the HWRCs as normal and we can focus on stopping traders from using the site;
- Separate your waste before you visit to make it easier to recycle. This helps 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, clothes, cardboard etc.
- If you are recycling rubble, you will only be allowed to bring 5 bags (900mm x 600mm) 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.

Let's SCRAP Fly tipping Campaign

Before implementation of the policy, R4GM and all 9 districts are running the Lets SCRAP Fly tipping campaign to raise awareness of traders and residents responsibility (duty of care) with regards to waste disposal.

Hertfordshire Waste Partnership have designed the campaign with 11 local authorities, the Environment Agency, Police and Keep Britain Tidy. To date 63 local authorities across England and Wales have successfully implemented it. 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;
- Videos;
- Banner for HWRC;
- Vehicle livery suitable for refuse collection vehicles and street cleansing vehicles;
- Adverts, posters;
- Template press release; and
- Warning stickers.

The campaign has been rolled out across all 9 districts in Greater Manchester initially on social media to raise awareness of fly tipping and duty of care legislation. Adverts have been booked in local newspapers and magazines during January to March 2020 and digital display advertising will appear on websites visited by traders such as B&Q and Screwfix etc.

Additional communications will be developed as outlined in the plan attached.

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 using a baseline from each local authority;
- Number of traders identified and refused entry from HWRCs site;
- Number of complaints;
- Number of vehicles visiting each site recorded through ANPR; and
- Results of online customer survey on Recycle for Greater Manchester website.

Activity	Date	Action needed
Roll out Lets SCRAP Fly tipping campaign across Greater Manchester	From 2 nd Dec	<p>Provide social media toolkit to all districts</p> <p>Add landing page to R4GM website https://recycleforgreatermanchester.com/flytipping/</p> <p>Book advertising in local newspapers and magazines for Jan/Feb/March</p> <p>Digital display advertising in Dec/Jan/Feb. Push adverts will target websites such as B&Q, toolstation, Screwfix. This is automated selection based on specific domain topics and targeting</p> <p>Fly tipping videos available now on R4GM You Tube Channel https://youtu.be/zasgJHaDFq4 https://youtu.be/7sEm2Ok-HyA</p>
Update R4GM website	Dec	<p>New pages added to R4GM website to advise of changes https://recycleforgreatermanchester.com/wheres-my-nearest-recycling-centre/changes/</p> <p>Page added on how to dispose of trade/business waste https://recycleforgreatermanchester.com/how-do-i-get-rid-of-business-waste/</p> <p>Video added to show how to use the HWRCs with information about the ANPR and new policy</p>
Run online survey on R4GM website, repeat in April/May 2020	Dec	Questions hosted on the website to find out customer experience, e.g. how often do you visit the HWRC, what vehicle do you use, what did you take on your last visit?
Review Council websites to ensure consistent advise re trade waste and duty of care	Jan	Standard content provided for council websites regarding HWRCs, fly-tipping, bulky waste collections

Advertorials/ad in local business directories/publications	Dec – March	<p>Focused on resident’s responsibility when looking for a trader to dispose of their household waste and that traders should not be using HWRC.</p> <p>Targeted a range of publications across all districts including council magazines.</p>
Add leaflet in the business rate letters that are sent in March 2020	March 2020	Find out cost and more information from District officers (TBC)
Implement customer service training to Suez HWRC staff	Dec 2019	<p>Suez are recruiting additional HWRC staff per site, some apprentices being recruited.</p> <p>Staff training in Dec ahead of 26th Dec, with further training planned during Jan and Feb.</p>
Signage on HWRC	Jan 2020	<p>Use existing noticeboards at HWRCs to display information on the policy and FAQs.</p> <p>Review signage and agree if additional is needed at HWRC; e.g. on rubble containers</p>
R4GM newsletter	Jan 2020	Advise of changes being made in Feb 2020 and why
R4GM Bin App -	Jan 2020	Add messaging to include duty of care information/notice
Social media advertising to raise awareness of new restrictions.	Jan 2020	Paid Facebook advertising regarding the policy
Advertising in local newspapers,	Jan-March 2020	<p>Full page ads and advertorials w/c 13th Jan in newspapers</p> <p>Bury Times Heywood Advertiser Manchester Evening News (Monday) Manchester Evening News (Sunday) Manchester Evening News (Thurs/Friday) Manchester Weekly News (Salford edition)</p>

		<p>Metro Middleton Guardian Oldham Reporter Oldham Times Rochdale Observer Saturday Stockport Express Tameside Reporter Messenger The Bolton News Asian Leader</p>
Press release to inform residents of the changes	3 rd Feb 2020	Book photo opportunity at HWRC with lead portfolio holder for Green City Region.
Develop standard templates for Complaints	Dec 2019	Produce letter templates and reactive statements
Education tours at visitor centres	Jan 2020	<p>Include policy update and information on education visits for community groups / adult groups Talk about how to use HWRC and sort recycling</p>

Stakeholder Engagement and Briefings

Briefing note for all ward Councillors with a list of FAQs	Dec 2019	Prepare and send following General Election on 12 th Dec
Waste committee presentation and pack for Cllrs for 16 th Jan 2020	Jan 2020	Prepare waste committee report Prepare presentation and pack for each Cllr including example trade waste pack and FAQs
Brief Green City region portfolio lead and agree photo op	Dec 2019	(on hold until after General Election)
Briefing note for all call centre staff at councils, council officers	Dec 2019	Distribute before Christmas with list of FAQs
Briefing for GMCA waste and resources team and all Suez staff	Dec 2019	Circulated before Christmas with copies of the leaflet
Briefing for Business Growth Hub	Dec 2019	Meeting held 16 th Dec to discuss disseminating through their channels
Briefing for Local Enterprise Partnership	Dec 2019	Share social media assets for use on their channels
Internal communications for GMCA, Fire, TfGM and council staff, Inside GMCA.	Jan 2020	Distribute in Jan 2020 through Inside GMCA, intranet and internal briefings.
Update Heads of Communications at each local councils	Nov 2019- Feb 2020	Provided update at last meeting on 21 st Nov, will provide further update in Feb 2020
Draft reactive media statement to advise of changes to the HWRCs and link to R4GM website for further information	Dec 2019	Statement prepared in advance of leaflet distribution on 26 th Dec 2019 –Agree with GMCA media team