

Greater Manchester Combined Authority

Waste and Resources Committee

Date: 22 January 2025

Subject: Update on the Management of Waste Upholstered Domestic Seating

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

Purpose of Report

To provide an update on the management requirements for managing waste upholstered domestic seating that contain persistent organic pollutants.

Recommendations:

The Committee is requested to:

1. Provide any comments or observations and note the update provided in the report.

Contact Officers

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Equalities Impact, Carbon and Sustainability Assessment:

Recommendation - Key points for decision-makers

Insert text

Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation
Equality and Inclusion		
Health		
Resilience and Adaptation		
Housing		
Economy		
Mobility and Connectivity		
Carbon, Nature and Environment	RR	The decision (which is a result of a change of law) will result in an increase in waste collection vehicles on GM's roads. In the immediate term the additional vehicles will use diesel increasing CO2 emissions.
Consumption and Production	RR	The requirement will reduce the availability of some upholstered domestic furniture from being reused. It is as a result of a change in law where reduction of the environmental impact of the waste upholstered domestic seating item is seen as the priority.
Contribution to achieving the GM Carbon Neutral 2038 target		In the immediate term the requirements for the separate collection of WUDS will increase the number of vehicles on the road increasing CO2 emissions.
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

Failing to implement could result in enforcement action taken by the Environment Agency.

Legal Considerations

The changes required are in response to a change in law.

Financial Consequences – Revenue

The Authority Notice of Change referred to in the report resulted in revenue impacts – these are quantified in the report or verbally reported at the meeting.

Financial Consequences – Capital

The Authority Notice of Change referred to in the report resulted in capital impacts – these are quantified in the report or verbally reported at the meeting.

Number of attachments to the report: None

Comments/recommendations from Overview & Scrutiny Committee

N/A

Background Papers

- Contract update, Waste and Recycling Committee, 18th January 2023
- [Manage waste upholstered domestic seating containing POPs - GOV.UK](#)

Tracking/ Process

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

None.

GM Transport Committee

N/A

Overview and Scrutiny Committee

N/A

1. Introduction/Background

On 1 January 2023 new compliance procedures covering the collection and disposal of waste upholstered domestic seating (WUDS) containing persistent organic pollutants (POPs) came into force.

POPs are certain chemical substances that are known to stay intact and do not break down. If waste containing these is not managed responsibly, they have the potential to cause damage to the wider environment. POPs can be found in older WUDS (including sofas, armchairs, upholstered dining and office chairs etc.) above legal limits and in the form of certain flame-retardant chemicals which have been banned since 2019 and are no longer used.

This resulted in the need for local authorities to change their processes for dealing with WUDS potentially containing POPs. As the only disposal route for this waste stream is energy from waste, landfilling of it was banned (but this had little impact on the GMCA given the very rate of landfill diversion being achieved).

In late 2022 when the Environment Agency (EA) belatedly alerted local authorities to the requirements to change collection and management methodologies a number of Regulatory Position Statements were published effectively delaying implementation until December 2024.

This report updates the Committee on the new requirements, actions to date and the implications of the changes.

2. New Requirements

Historically, either through the HWRC network or via each district's bulky waste collections items of furniture including WUDs have been disposed of in the same skip or collected together in the same vehicle. Figure 1 below provides a simplified summary of that historical process. Bulky waste was either directly delivered or transferred to one of the mechanical treatment and recovery facilities (MTRs) where it was shredded before being loaded on to one of the trains for thermal recovery at Runcorn thermal power stationⁱ.

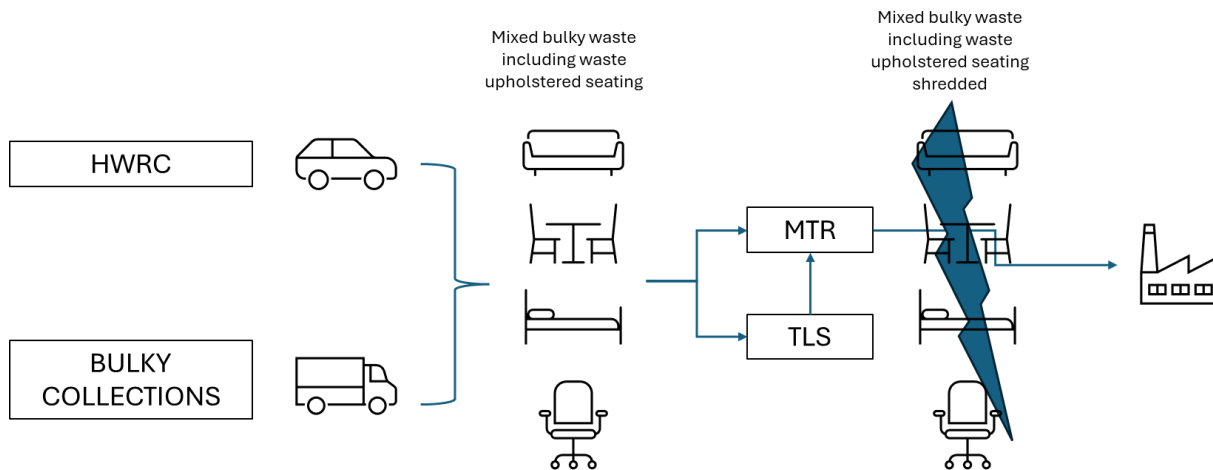


Figure 1: the historical bulky waste disposal process

The new legislation now requires a significant change to this process.

In terms of bulky waste delivered by householders to the HWRCs (see Figure 2 for a simplified summary. The red items depict potentially POPs-containing WUDS, the green items – other bulky wastes), residents take their bulky waste as normal to the facility but if the items include sofas, armchairs, upholstered dining and office chairs etc. for disposal (please note: items donated for reuse are not waste so therefore not included in the changes) a decision must be made on whether the items are likely to contain POPs.

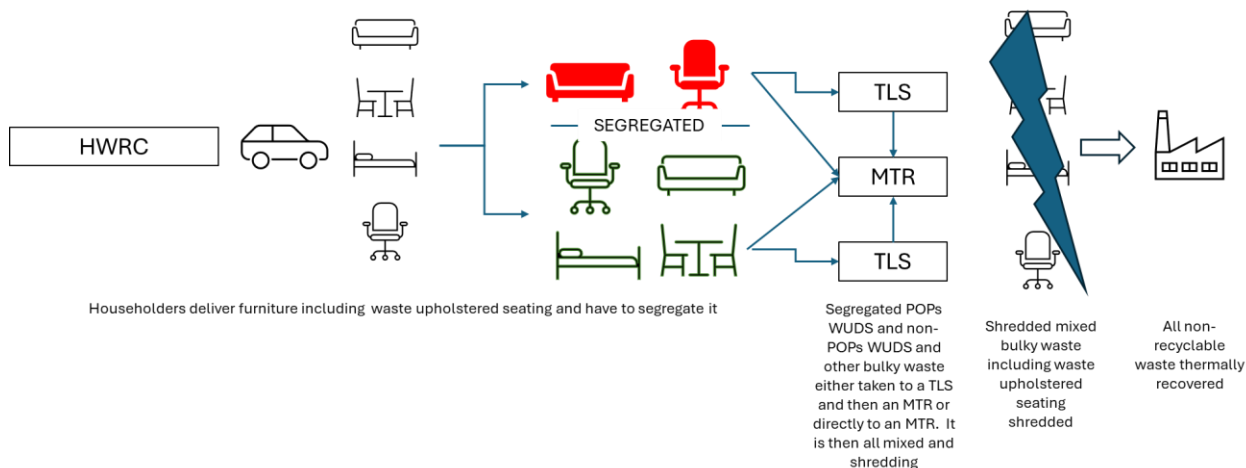


Figure 2: the new process for managing WUDs at HWRCs

In reality, the resident or site operative is very unlikely to know if the item contains POPs unless they undertake a test using a x-ray fluorescence detector. Without written evidence of the absence of POPs the items must be managed as if they contain POPs.

So in reality – at HWRCs WUDS will need a dedicated skip and items that are not WUDS (furniture that is not upholstered such as tables, wooden chairs etc.) will need another skip.

That is not the end of the process. These skips – depending on the location of the HWRC – will either be taken to a transfer loading station (TLS) or MTR. In some cases the WUDS skip will be taken to a TLS and tipped into a dedicated bay and the other bulky waste tipped into a normal non-recyclable waste bay. The WUDS will then be loaded onto a dedicated vehicle and taken to the MTR.

Similar skips from some HWRCs can be directly delivered to the MTRs.

In both cases the segregated WUDS material and the non-recyclable waste (containing other bulky waste items) can be mixed and put through the shredder as normal to create secondary recovered fuel for the Runcorn thermal power station.

For bulky waste collection services, districts can collect WUDS on the same vehicle as other waste items as long as they are:

- not mixed with other waste;
- collected in a way that does not contaminate the other waste (for example compaction); and
- separated from the other waste when unloaded from the vehicle.

If collectors use a compacting refuse collection vehicle (RCV) you must:

- collect only waste upholstered domestic seating;
- contain any particulates and debris generated during the compaction within the body of the vehicle; and
- use a vehicle dedicated to the collection of waste upholstered domestic seating only or, where this is not possible, make sure it is cleaned before it is used to collect loads of non-POPs waste.

Figure 3 below summarises the management process for kerbside bulky wastes.

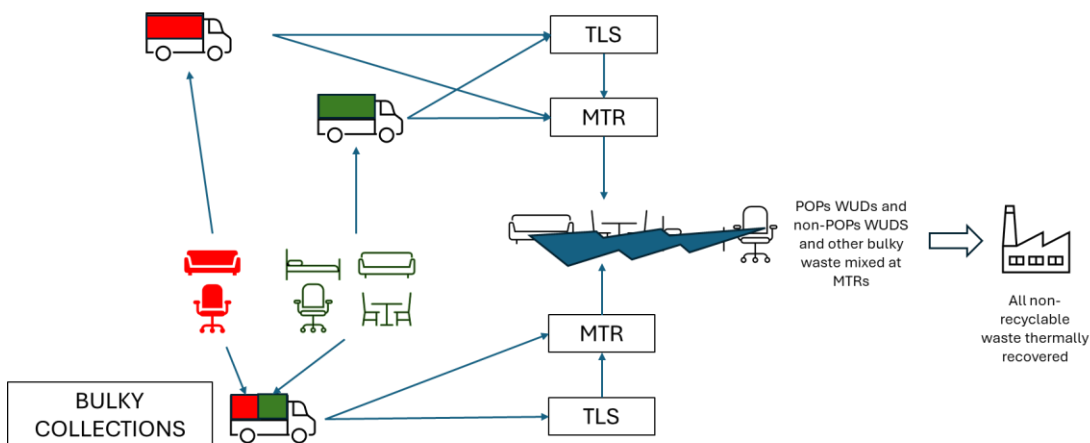


Figure 3: the new process for managing WUDs in kerbside bulky collections

As with WUDS and bulky wastes arising at HWRCs, kerbside collection now requires segregation of materials at the point of collection either on the same vehicle or by using two vehicles possibly trailing each other during collections. The back end of the process, again, permits the mixing of wastes at the MTRs.

3. Implications for GMCA

GMCA and all local authorities have long voiced their concerns about the changes and how they will and do result in additional vehicles on the roads with all the impacts on air quality, congestion and resource use, the double and triple handling of wastes and the pressure it places on facilities.

Since the introduction of the Regulatory Position Statements (RPS) the majority of local authorities have been operating under these effective exemptions. In the meantime strong lobbying of the EA by organisations such as the Local Government Association, the Environmental Services Association, the Local Authority Recycling Advisory Committee and regular discussion were taking place. The EA did make some concessions (for example they originally indicated they would only allow the mixing of POPs materials and other wastes at the energy from waste facilities – this would have required GMCA (for example) to send dedicated WUDS trains to Runcorn for that operator to mix and recover.

On December 1st 2024 the RPSs expired. The industry expected the EA to revise its position but it did not so it came as a shock when Suez informed us that we would need to make immediate changes to services. In short (and the position at the time of writing) we would be required to:

- **At HWRCs:** install dedicated WUDS skips or bays (depending on site layout) at all 20 sites. To accommodate this space has been taken from other wastes (for example green waste) – this may cause a problem in the longer term. Additional signage would also be required. Initially POPs waste will only be delivered to MTRs for shredding, or Raikes Lane for treatment – until TLS sites have POPs bays set up; and
- **At delivery points:** there is no issue for direct delivery from HWRCs or district collections of materials to MTRs. As Longley Lane does not have a shredder materials will be bulked out from a separate bay to another MTR or sent to Raikes Lane. WUDS delivered to TLSs by districts will need to be tipped into a segregated

bay at the TLS and then separately transported to an MTR facility for shredding prior to onward rail transport to Runcorn for incineration.

4. Next steps

GMCA has been working closely with the districts and Suez to try to find the solution to the WUDS challenge in the most pragmatic, least impactful but compliant manner. This is difficult. A Notice of Change will be issued detailing the costs associated with the change. These costs will be provided at the meetings.

ⁱ A relatively small proportion of the bulky waste is delivery to our Raikes Lane thermal recovery facility for disposal. This waste does not require shredding.