

Consultation on Consistent Collections in England: Response from the Advisory Committee on Packaging (ACP)

Introduction

1. We believe local authority (LA) kerbside collection systems not only work well in general but they are also a great national asset. Households in general are involved in these systems and have good awareness of when bins are collected and a growing concern about recycling and impact on the environment. These systems bring the state in contact with almost every household (and every business) roughly once a week at a reasonable cost and hold great potential, eg, in increasing environmental action awareness, collecting research information, and other positive outputs.
2. We recommend an approach of building on these systems based on capturing positives from each part of the UK and encouraging innovation locally for wider use. Thus, learning from Wales which has a much higher municipal collection rate could be an early feature.
3. We also recommend a re-examination of the impact assessment. We believe assumptions used and the final benefit values could possibly be moderated down based on realism.
4. While increasing waste collection quantity and improving its quality are laudable aims of consistent collections, we are disappointed that the opportunity to minimise waste or increasing reuse is being missed. Residual waste, eg, could be reduced by allowing frequencies to be reduced or looking at more radical policies such as 'Pay to throw'.
5. Linked to this is the regrettable lack of explicit contact with and involvement of citizens and households in taking this subject forward. Surveys of representative households and businesses could have been highlighted in relation to a proposed design or a specific parallel effort in gaining their ideas could be attempted in addition to the well-meaning public consultation which is unlikely to reach anyone outside of professional interests.
6. On-pack labelling has a crucial connection with collection and recycling and reduces costs and confusion with consumers and the public. More should be done to make that more common and consistent and linked to collection systems. Similarly, use of technology, eg, data labelling and scanning and reading by smart phones or alternatives, has huge cost-effective potential; more could be made of it at least on the basis of experiments in limited areas to be expanded later.
7. Extended Producer Responsibility (EPR) reforms could have a more direct and beneficial impact on collections if payments to local authorities are linked to quantity and quality of collections so that there is a positive incentive. Within that there should be scope left for local authorities to innovate and not be bound by relatively micro measures such as bin colour or caddy liner. Bin colours become relevant if households moved every two years and time to understand local bin colours was prohibitively long; caddy liners aid collection but the marginal benefit-cost ratio may be suspect.
8. Costs on local authorities including capital investment should be put on in a staged manner, ie, each local authority should have the opportunity to get to the optimum in, say, three stages.
9. We recommend that waste regulation be concentrated in a new specialist regulator. Results are likely to be greatly boosted at limited marginal cost given the specific attention to subjects like litter, fly-tipping, contamination and export.

Answers to specific questions in the consultation document:

Part 1: Measures to improve the quality and quantity of household recycling.

Proposal 1

Q6 & Q7– We agree. We have a question around other tubes such as toothpaste and whether this needs to be addressed as it has potential for further citizen confusion.

Q8-- We see no good reason why LAs are not able to collect these materials in the timeframe set out, and are concerned that LAs currently planning changes to services may postpone as they await new burdens or EPR funding. We feel government should consider a phased approach to implementation, allowing early applications for funding (this way we could get early starters moving) to build confidence in necessary investment, particularly in end markets. Not to do so may lose industry 18 months in waiting.

Q9– We support the inclusion of food and drink cartons in the plastic recyclable waste stream, thereby separating them from other paper and board. If collected with paper and board they could contaminate the material with the consequence that it may not be saleable or will command a low market price.

Proposal 2

Q11 & Q12– We agree. We would like to see some opportunity funding to those LAs willing to make collections of film earlier than the proposed implementation date, lighthouse projects so to speak. These early adopters could be invaluable in providing guidance and lessons learnt in how to effectively implement collections. These lighthouse projects would stimulate further investment in effective end markets to address those issues and concerns for LAs, waste management companies, material processors and other stakeholders. This work would need to take place in parallel to collection projects.

Proposal 6

Q17-- There needs to be a clear policy decision with regard to bio-degradable and compostable plastics packaging. It should either be banned or fully included in the core set of materials and not left as a 'could be'. This should further be considered in terms of what is 'allowable' to be placed on the market and should only come on to the market if it is completely compostable. Consumer messaging will need to be absolutely clear as to whether it is allowable in an organic waste stream, or not allowable at all, something along the lines of "dispose with your food waste". We would further recommend compostable packaging is produced in a single consistent colour, the same as clinical waste bags, so it is very clear what it is as opposed to traditional plastic type packaging and film.

Proposal 10

Q23 & Q24– We consider the waste hierarchy should be adhered to and, dependent on property type, separation at source so that households are asked to separate into different bins or bags. We feel strongly that the proposal for a deposit return scheme (DRS), its timing and its impact, have not been adequately covered (see our DRS consultation response). We accept that even with a source separated collection certain materials will be mixed together on the collection vehicle, the most prevalent being plastic and metal. Although plastic and metal is a better combination, glass and metal could be mixed in some circumstances, but it depends on the proportions and where it goes. Assuming there is no DRS for glass but there is for metal, then the mix is mostly glass and there's a better chance of it going to a glass recycler. If the mix goes to a glass recycler, they will get best value for the glass and recover all the metal too. If it goes to a metal recycler or a material recovery facility (MRF) they are likely to process it in a way that is not as good for glass (to break it to get it away from the metal, for instance). So mixing increases risk of deterioration to glass quality and of recycling yield. Housing types within a council area will play a major role in how materials can be collected.

We would suggest a decision tree is developed as part of the technical, economic and environmental practicability (TEEP) assessment process to aid the correct collection operation and process to best fit the make-up of an area.

Proposal 11

Q25 to Q33– Exemptions will need to be consistent and as we've stated in proposal 10 the waste hierarchy should be adhered to and the local circumstances relevant to a particular local authority, or parts of it, need to be key considerations in the type of collection service provided. We also feel the impact of citizen behaviour also needs to be taken into account as this ultimately impacts all recycling collection services. Again, if a DRS were to be introduced in England it could have an impact on household collections and citizen behaviour.

Proposal 12

Q34 to Q38– We support the use of a standard template which provides consistency in the requirements and the written responses. However, care needs to be taken to ensure they aren't too restrictive. We believe the WRAP assessment tool is being updated and would suggest support from WRAP in using this would prove very useful to LAs in making their assessments. We would therefore recommend Defra and WRAP engage with local authorities and the processing industry to co-design any templates and associated guidance that could be used.

Proposal 13

Q39– We support regulations allowing both possibilities based on the local situation. In some places material recovery facilities like Re-Gen and UPM have already invested in plants that produce high-quality fibre on a par with separately collected fibre. In other locations separate collection of fibre would be appropriate for a dual-stream system.

Proposal 14

Q40– Contact and communication with citizens and households should be clarified, encouraged and made explicit. This would be helpful particularly in tackling issues such as contamination in recycling collections. LAs presently have few or no powers in this regard, other than removal of the service from a persistent contaminator and it would be useful, at the very least, to have clear and meaningful non-statutory guidance in how best to deal with such occurrences consistently.

Proposal 15

Q41– When material recovery facility regulations were implemented they were not linked to aspects of producer responsibility policy reform. We feel therefore care needs to be taken to ensure that changes in the regulations are a suitable vehicle to deliver aspects of EPR reform. We feel careful consideration needs to be given to the design of the sampling protocol. It should be designed in a way that is fair to both collectors and reprocessors. There should be clear definitions in place for non-targeted material that is an operational concern but does not impact material quality and genuine contamination that impacts on material quality. The scheme needs to ensure there are no loopholes within the system which could undermine confidence.

Proposal 16

Q43 to Q45– We agree. Recycling credits should no longer relate to packaging material subject to EPR payments. With regard to other materials collected we would support option 2, and if agreement cannot be reached between the waste collection authority and waste disposal authority the latter should only be required to pay for legitimate disposal or treatment costs.

Part 2: Measures to improve the recycling of non-household municipal waste from businesses and non-domestic premises.

Proposal 17

Q46 & Q47– We support the need to provide separate collections of all the materials proposed and this should ultimately align with collections of household waste in order to create consistent messages, whether at home or at work. However, we must recognise this will be a greater challenge to that of households since a well-established collection methodology has developed and operated for a number of years for the latter. Differences between households – eg, flats against houses – are better understood. Not all businesses are the same: in a typical high street you can have everything from a grocer to a fast-food outlet to a firm of solicitors and many others. That said recycling collections are taking place from many businesses, particularly back-of-store take-back operations, and work well. In our response to the EPR consultation the ACP was split on business (household-like) material on a cost point of view, but we agree that for recycling targets to be met separate collection of this material is of high importance. However we feel the timing will be challenging. There are clearly lessons to be learnt from Scotland which has taken around five years of work on implementation and refinement to its present reasonable state. We feel government will need to get the right balance in implementing policy for businesses and collections. The effect of implementation of DRS may also be a factor in timing as space for material take-back or siting of reverse vending machines could well be competing with space for segregation of materials from consistent collections and EPR.

Proposal 18

Q48 & Q49– As with household collections we feel plastic film collections should happen as soon as possible. There is already good evidence of film being recovered from back-of-store operations and front-of-store take-back schemes are developing positively. There are operators like Re-Gen who are already delivering some recycled plastic film but could deliver larger quantities after some adjustments or investment. We feel this positive activity should be easy to build on and help in developing investment in end markets which can then drive further increased collections. If this can tie in with lighthouse projects for the collection of film from households, stated in part 1, we feel this would be a real positive step forward in finding a sustainable solution for this material.

Proposal 20

Q52– We agree. All of the scenarios listed in this question could pose as barriers to recycling from non-household producers. We feel engagement will be the main factor along with space and location. Effective communication and some form of support to businesses making the transition will be important to overcoming these barriers as well as flexibility in collection methodology. Again we can learn valuable lessons from Scotland as stated above.

Proposal 21

Q53 & Q54– We agree that “micro-businesses” should be exempt but do not agree with your proposed definition. 90-95% of businesses in the UK are SMEs or smaller and the number of staff is not a good proxy either for revenue or profit of a business or its waste creation or collection potential or indeed of resources to deal with collections. A much fairer definition is size of premise/location. First, any business with a physical premise/location/address should be subject to collections and only the smallest premises (eg, kiosk) should be classified as micro-businesses from these requirements.

Proposal 22

Q55 to Q61– We have stated earlier and in our response to the EPR consultation that collections of household-like material from non-domestic premises is very complex. In theory zoning could work as it

would go some way in replicating collections from households allowing standardisation of collections on a specific schedule by a single collector. However this is far easier said than done. As we stated in our response to the EPR consultation, we would recommend this element of consistent collection implementation is delayed to allow time for proper thought and planning. Again lessons from Scotland's implementation would be beneficial. It is important to have people who are specialists in this field to help shape implementation. We suggest zoning, including on a material basis, is tested for its cost-effectiveness in a small local area. Similarly, we suggest availability of competitive offers for collection to businesses (or indeed households) is tested by encouraging competition in a local area since that could give lower costs and greater effectiveness and excitement in the long run.

Proposal 23

Q62 & Q63– Please see our answer under proposal 10.

Proposal 24

Q64 to Q72– We have concerns around how TEEP can be effectively applied to the business sector. There is a danger that if not thought through effectively it could introduce complexity and bureaucracy that imposes cost and red-tape on businesses. We feel a holistic approach for all types of businesses would be a better way forward especially if a zoning approach were taken forward. This would enable minimum standards and best practice to be included and a more equitable and fair level of service provision which could be benchmarked and compared. A comparison could be a locality based waste/recycling management plan, the smaller scale equivalent of a joint municipal waste management strategy for non-household municipal waste.

Proposal 25

Q73 & Q77– As we have stated previously we would suggest some form of standard template, preferably an online form. There should be no easy opt-outs and organisations completing the template should be limited to a choice of responses and minimal, if at all, free-form entries which could require intensive and subjective assessment. This would allow any external audit and verification process to be simpler and quicker to review. Again, this could be looked at holistically across business types rather than individual businesses.

Proposal 26

Q78– We would suggest some material streams will require some sort of support possibly financial. For instance, the true costs of collecting and processing plastic film is still largely unknown. Please see our comments on the impact assessment in the introduction.