

Briefing Note

To	
From	
Subject	
Purpose	
Decision required	
Status	Confidential

Consistency in Household and Business Recycling in England

Purpose

This briefing provides an update on publication of the latest round of Government consultation on England's 'Resource and Waste Strategy'.

On Saturday 21 October, government published its long-awaited response to the consultation on its proposal for consistency in the collection of household and business waste in England (which closed in July 2021). The consultation runs for 4 weeks with a closing date of Monday 20 November 2023.

This note summarises the government's response with some initial thoughts on the potential implications for Bury Council.

The response confirms various positions, revises some others, and confirms timescales (some of which have been delayed). "Consistency in the collection of ..." has now been renamed *Simpler Recycling*.

The webpage for the response can be found here: [Government response - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/simpler-recycling).

Background

On 18 December 2018 Government published its long awaited Our Waste, Our Resources: A Strategy for England, which in the main sets out Government's interpretation of the European Union's (EU) Circular Economy (CE) package (EUCEP).

Following the publication of the Strategy, four consultations were released on 18 February 2019, covering:

- Consistent Collections;

- Deposit Return Scheme (DRS);
- Extended Producer Responsibility (EPR); and
- Plastic Packaging Tax

Since then, there have been four rounds of consultations with the last one being published in February regarding the separate collections of food waste, whereby the Council applied for Transitional arrangements.

Throughout the process Bury Council worked closely and fed back through Greater Manchester Combined Authority (GMCA), Waste Resource Action Programme (WRAP), Association for Public Service Excellence (APSE), Chartered Institute of Waste management (CIWM) and The Local Authority Recycling Advisory Committee (LARAC).

Simpler Recycling

The collection of recycling

The government confirmed the range of materials that it expects to be collected:

- Glass - glass packaging including bottles and jars;
- Metal - steel and aluminium tins, cans, aerosols, jars, and bottle lids; aluminium foil and food trays; aluminium tubes;
- Plastic - plastic bottles, pots, tubs and trays, plastic tubes larger than 50mm x 50mm; food and liquid cartons, plastic film packaging and plastic bags; and
- Paper and card – except paper and card that contains glitter or foil; paper that is laminated; stickers and sticky paper; padded lined envelopes; paperback and hardback books; wallpaper.

Some of the more difficult plastics (such as films) can be sent for non-mechanical (chemical) treatment. However, this will only be counted as recycling if the resultant materials are used to replace virgin materials in manufacturing. If the waste is used to create a fuel (such as sustainable aviation fuel) it will be counted as recovery.

The collection of food waste

The requirement remains for the collection of food waste separately and on a weekly basis from all households, but implementation has been put back one year so must now be implemented by 31st March 2026, however, as we applied for transitional arrangements in March 23 Bury Council are exempt from this timescale until 2034.

The collection of garden waste

The original proposal of mandating the collection of garden waste free at the point of use has

been dropped as the government recognised other policies offered higher carbon savings per pound spent on the policy. The choice to charge or not is up to the local authority but the material must be collected at least fortnightly.

The co-collection of food and garden waste

The government intends to consult on providing an exemption for the mixed collection of garden and food waste. If supported, it is suggested an exemption would be put in place to allow this without the need for the completion of a written assessment.

Collections from non-household municipal premises

As mentioned above the requirements for the collection of dry recycling and food waste apply to schools, offices, shops, hospitals, places of worship etc. with the requirement being on those premises sourcing collections as appropriate to them (for example if the premises does not generate food waste it does not need to procure the collection service). The requirement to collect from these premises commences a year earlier than for households – by 31st March 2025.

The collection of residual non-recyclable waste

In the consultation the government is clear it wants to see fortnightly collections of residual waste as the minimum service level. Subject to consultation, the government has confirmed that this is its preference stating that this “minimum standard will help protect local amenity and the local environment from piling residual rubbish, and prevent odours, pests, and vermin. It could also prevent unintended consequences of cuts to residual collections that could further undermine local amenity and could encourage fly-tipping.” – by 31 March 2026.

Funding

The costs to deliver these new duties will be funded through a combination of the following measures:

1. Reasonable new burdens funding to local authorities to provide weekly food waste collection from households. Funding payments will be calculated via modelling and include capital costs (such as vehicles and containers), as well as resource costs (such as vehicle re-routing, communications, and project management) and ongoing service costs (such as collection and disposal costs). Local authorities will be informed of allocations in due course. Authorities benefitting from transitional arrangements will not receive funding in the short term.
2. EPR for packaging payments will be provided to local authorities, with packaging producers responsible for the costs of collecting and managing packaging waste through efficient and

effective services. This includes the collection of additional packaging materials for recycling, such as plastic films and flexibles.

3. It remains the case that under section 45(3) of the Environmental Protection Act 1990, and the Controlled Waste (England and Wales) Regulations 2012, waste collection authorities may, as they can now, recover a reasonable charge for the collection of garden waste.

Any authority currently operating three weekly residual waste collections will not receive financial support to revert to fortnightly collections.

Guidance (statutory and non-statutory) and consultations

The government has confirmed the following new duties for local authorities:

- requirement to deliver weekly food waste collections from households;
- requirement to collect garden waste in accordance with the new section 45A of the Environmental Protection Act 1990, where there is a duty to collect garden waste; and
- requirement to collect a consistent set of dry recyclable waste streams for recycling – plastics (including film), paper and card, metals, glass.

The government published draft statutory guidance on the new duties listed above for consultation – please see Appendix 1 for a summary.

Implementation timescales

The government pushed back the date of these reforms to ensure local authorities have the time they need to prepare and to align with the implementation of the packaging extended producer responsibility reforms. The new timescales are:

1. For collections of dry recyclable materials (except plastic film) from:
 - households: by the end of the financial year in which EPR for packaging commences – by 31 March 2026
 - businesses and relevant non-domestic premises: by 31 March 2025
 - micro-firms: by 31 March 2027
2. For collections of plastic film from:
 - households, businesses, non-domestic premises, and micro-firms: by 31 March 2027
3. For collections of food waste from:
 - households: by 31 March 2026 – unless a transitional arrangement applies.
 - businesses and non-domestic premises: by 31 March 2025
 - micro-firms: by 31 March 2027

4. For collections of garden waste from:
 - households: by 31 March 2026
5. For minimum collections of residual waste from:
 - households: by 31 March 2026

Implications for Bury Council

Pros

- We will be able to collect recycling material comingled as we currently do so.
- Implementation of plastic pots, tubs and trays, plastic film packaging and plastic bags, this would reduce contamination.
- as we applied for transitional arrangements in March 23 Bury Council are exempt from this timescale until 2034

Cons

- Confusion for residents moving cartons from the green to blue bin;
- End market availability for the additional plastic material; and
- Financial burden of implementing recycling and food waste collections to all commercial waste businesses across Bury.
- Impacts and additional costs on the disposal contract.
- In partnership with GMCA would look to put in place an exemption to allow to continue for comingled collections of food and garden waste.
- Requirement to implement food waste and dry recycling by March 2025 to non-household municipal premises.
- Implementation of two weekly collections of the grey bin. This will have major financial impact on bury with the need look at additional vehicles, staffing, fuel, depot space, increase in levy disposal, reduction in recycling levels – approx. costs of £3m.
- No funding available from government to revert from 3 weekly to fortnightly.

Implications for Greater Manchester

From our review of the consultation response and the Simpler Recycling consultation the following implications have been identified:

- Timescales - Timescales – the alignment of timescales to accommodate delays to the implementation of EPR are welcome. However, it should be noted collections from non-household premises are due to come into force by 31st March 2025 and this will require action by those districts collecting commercial waste.
- Cartons – currently GM asks residents to place cartons in the paper stream. If we are required to transfer them to the container stream, we will need significant communications and any new materials sorting facility will need the capability to

separate these.

- Exemption for the commingling of food and garden waste – the exemption is welcomed as is the removal of the requirement to draft written TEEP assessments.
- Exemption for the commingling of dry recycling – as above the exemption is welcomed and provides all local authorities with the ability to decide services that align with policy, strategy, local choice, and infrastructure.
- Non-household municipal premises collections – several GM authorities offer chargeable collections to non-household premises (along with many other commercial operators) and the take up of recycling is relatively low. Mandating recycling will increase take up requiring additional collection resources and bringing in new material to GMCA's facilities. This provides an opportunity but also a threat as our model of dual stream recycling may not prove to be attractive to customers if competitors offer a single commingled stream collection service.
- Residual waste collection frequency – four of the nine districts collect residual waste on a three-weekly cycle. This is known to have a positive effect on recycling rates. Mandating a fortnightly collection is likely to result in a reduction in recycling performance as well as increase costs. When the consultation on this is published, we will collate and submit the evidence that demonstrates the impact of recycling performance and quantify the costs involved in such a move.
- Funding – the three GM authorities not covered by the transitional arrangement should receive new burdens funding for the implementation of the food waste requirements and they will be notified of the amount in due course. Those authorities collecting residual waste on the collection three weekly cycle will have to cover the costs of conversion themselves (subject to consultation).

A further consultation was published by government on additional policies related to Simpler Recycling and this is summarised in Appendix 2. Both consultations are under review by Bury and GMCA. The response submission deadline is 20 November 2023.

Bury Council are working with GMCA on a Greater Manchester response, and we will also include our own response as shown with regards to the consultation on Simpler Recycling in Appendix 1.

Appendix 1: Bury Council's response.

About Bury Council

Q1. Would you like your response to be confidential? Please see the confidentiality and data protection information in the above section of this document. (Required)

No

Q2. What is your name?

Daniela Dixon

Q3. What is your email address? (Required)

d.dixon@bury.gov.uk

Q4. Which of the options below best describes you?

Local government

Q5. If you are responding on behalf of an organisation, what is its name?

Bury Council.

1. Exemptions from the requirement to collect the recyclable waste streams separately from each other

Q6. Do you agree with the provision of an exemption to allow for the co-collection of paper and card, plastic, metal, and glass in one bin without needing a written assessment?

Disagree

For many years the paper reprocessing industry has been clear that glass should not be mixed with paper and card destined for recycling. This exemption will affect quality of materials and availability of end markets. Ultimately it is vital that the waste management sector provides the reprocessing sector with a high-quality material to displace virgin resources if the circular economy is to be an embedded business model.

There are a limited number of successful examples of fully comingled collections that deliver to purpose built MRFs that have all of the necessary sorting equipment e.g., Shotton Paper Mill MRF. The vast majority of existing MRF infrastructure currently operating does not have the necessary level of NIR separators and other equipment to adequately sort the materials and prevent cross contamination between streams. This will lead to issues with reprocessors, reduced levels of income and increased rejection rates. This approach should not be promoted or adopted unless the correct sorting infrastructure exists which it currently does not on a national level.

Collection of all recyclable materials including paper and card in one bin will require a larger capacity bin and more frequent collection which will increase collection costs and require additional processing thereby also increasing disposal costs with greater risk of contamination.

Co-collection of all recyclable materials will also affect behaviour as the need to segregate is reduced which may lead to reduced capture rates of materials.

Local Authorities are best placed and should have the flexibility to make local decisions on how they collect materials and how they design their services.

Q7. Do you agree with the provision of an exemption to allow for the co-collection of food and garden waste in one bin without needing a written assessment?

Agree (please explain why you agree)

GMCA has responded in previous consultations to say that mandatory separate collection of food waste is unnecessary. WRAP state that a well implemented separate food waste collection will capture c.1.5 kg/hh/wk. of food waste. The collection authorities in Greater Manchester operate mixed food and garden collections that currently generate c. 1.52kg/hh/wk. of food waste. There is no need to change from a mixed collection based on current performance. Evidence in Greater Manchester also shows that participation and capture rates reduce in areas where a food only collection is provided.

Modelling on the introduction of separate food waste collection in Greater Manchester has shown a net additional cost of £5.2 million pa with very little performance improvement. This cost does not include adaptations to existing bulking infrastructure (costs which are not recoverable via New Burdens funding) and ignores the fact that there is no anaerobic digestion (AD) capacity within the northwest.

Therefore, GMCA does not consider mandated source segregated food waste collections to be a sound

financial option when alternative methods for increasing capture (such as the communications campaigns GMCA delivers) based on the current service model can deliver a similar level of improvement. Additionally, alternative treatment technologies to wet AD (such as dry AD) can manage a mixed organics streams delivering improved carbon outcomes without the significant increase in collection costs that results from separate food waste collection for wet AD processing.

Local Authorities are best placed and should have the flexibility to make local decisions on how they collect materials and how they design their services.

2. Statutory guidance

Q8. The guidance advises that waste collection authorities should build flexibility into their contracts to ensure materials can be added/removed to the recyclable waste streams as new recycling technologies develop. Do you agree or disagree with the content of this section?

- Unsure
- Further content should be added (please explain why further content should be added)

GMCA's disposal contracts are worth around £1 billion over the 10-year contract term. These are very significant contracts with risk profiles agreed by GMCA and the contractor and the contracts contain change mechanisms to initiate changes to the services. We are unclear what, in the contractual context, is meant by "flexibility". Contracts already contain mechanisms to react to changes. Is there an expectation from Defra that contractors should be able to handle new waste streams and materials at no extra cost when in reality they may require adaptations to existing facilities or the sourcing of new outlets with different charges? If that is the expectation, government needs to be aware that requests to accept new materials will result in claims for additional costs using existing change processes.

Further content needs to be added to explain how government believes this will work with examples of contract drafting that places the risk of such changes on the contractor and does not result in significant risk pricing as a result.

The equipment and technology used in a materials recycling facility (MRF) is bespoke and designed to meet the requirements of the agreed contract requirements focused on the recyclable materials agreed as 'in scope' for collection. A change to an 'in scope' recycle material can create contamination issues for some or all recycling outputs. A MRF is not easily adaptable in the way suggested by the question. Also, a contract is based on a structured pricing mechanism. A change to acceptable products could drastically change the outcome of the pricing mechanism, and potentially make the contract no longer affordable for either the local authority, waste management company or both. Development of a new recycling technology does not necessarily make it the right solution for the local authority or contractor, nor does it mean it is affordable.

Q9. Do you agree or disagree with the contents of the list above, detailing the materials that are out of scope of the recyclable waste streams?

- Agree
- Materials should be added (please specify which materials)

There are a number of items missing from the 'out of scope' lists supplied in Annex 1. All the items listed below are the common misconceptions and should be made clear.

Paper and card items out of scope should include:

- Wallpaper

- Foil or plastic backed wrapping paper
- Paper or card containing glitter.
- Coffee/fast food drink cups

Plastic items out of scope should include:

- E-Cigarettes
- Vape devices.

Garden Waste items out of scope should include:

- Tree trunks
- Turf
- Japanese Knotweed
- Hogweed
- Soil
- Dog faeces
- Cat litter

Having a list of what's acceptable or otherwise is important but it will be extremely difficult to communicate to members of the public. This would benefit from a central campaign with simple, easy to understand messaging.

Proposed guidance on dry recyclable waste collections from households

Q10. Guidance is provided regarding the requirement to collect dry recycling from premises and the use of communal bins. Do you agree or disagree with the content of this section?

Disagree

Further content should be added (please explain why further content should be added)

The guidance should allow an alternative to kerbside collection that is based on local circumstances and decided locally to provide an appropriate service e.g., through provision of communal bins.

The content needs expanding to address the needs of apartment blocks, flats above shops, terraced properties, HMOs etc. Flats above shops (for example) are the hardest properties to service. They often have no space to store or present waste receptacles and if communal containers are used, they are often filled by businesses. Residents in these properties are often transient too making running this service more challenging.

There are successful examples of the use of a high-density network of on street bins used for food.

waste in areas of apartment estates and for flats above shops. Such a network alleviates the pressure on space in communal bins stores not designed for multiple waste streams – communal containment such as this should not be ruled out.

The content also ignores back-to-back terrace properties or terraced properties with communal back alleys that do not have space for multiple bins where communal bins may be used instead. Communal bins are not just used for apartments and HMOs. The guidance also ignores the likely lack of space in communal bin stores for multiple bins and the risk of contamination.

Further clarification is also required on the distinction between a communal bin that may serve several properties and be located in close proximity to those households and a big site which may serve many properties in a locality and be located at distance from the properties.

Q11. Is there any additional guidance that would be useful regarding the provision of caddy liners?

Yes

There is evidence that the provision of caddy liners at no cost to residents at a level that meets average needs contributes to the successful operation of food waste collection services and Bury Council feel these should be funded through the new burdens system. The ongoing costs of caddy liners are often the main reason they are not currently provided, as local authorities balance reducing funds with overstretched service needs across the whole authority.

Q12. Guidance is provided regarding the requirement to collect food waste from premises and the use of communal bins. Do you agree or disagree with the content of this section?

Disagree

If you disagree, please select one of the following to best describe why:

Further content should be added (please explain why further content should be added)

The guidance should allow an alternative to kerbside collection that is based on local circumstances and decided locally to provide an appropriate service e.g., through provision of communal bins.

The content needs expanding to address the needs of apartment blocks, flats above shops, terraced properties, HMOs etc. There are successful examples of the use of a high-density network of on street bins used for food waste in areas of apartment estates and for flats above shops. Such a network alleviates the pressure on space in communal bins stores not designed for multiple waste streams – communal containment such as this should not be ruled out. Please also refer to response to question 10.

With regards to collecting from premises and the use of communal bins, it is fair to ask a local authority to promote use of a caddy for each property when the scheme is first introduced. These caddies should be chargeable at a reasonable fee comparable to the cost of other containers in the local authority area, thus keeping chargeable rates for bins consistent. Any replacements for broken, lost, or stolen caddies should also be chargeable to the management company, landlord or resident.

Q13. The guidance provides advice on collection frequency of garden waste. Do you agree or disagree with the advice on collection frequency of garden waste?

Other

LA should be allowed to determine the frequency of collection based on seasonality and local climate

conditions as to when is the right time to reduce collection frequency.

Bury Council would like some further clarification on the requirements around the provision of a garden waste collection service within a local authority area.

The Environment Act 1990 (as amended) provides information under section 45(1)(a) that waste collection authorities are required to arrange for the collection of household waste unless it is situated at a place which in the opinion of the authority is so isolated or inaccessible that the cost of collecting it would be unreasonably high, and the authority is satisfied that adequate arrangements for its disposal have been or can reasonably be expected to be made by a person who controls the waste. As this applies to all household waste collected, this would imply that councils can continue to exclude garden waste collections under these circumstances.

The new statutory guidance states that local authorities will be required to provide a garden waste collection service where it is requested. The guidance also states that "The expectation is that households should receive an equivalent collection service for recycling as they do for residual waste. By this, we mean that where there is a duty to collect household waste, recycling should also be collected directly from the premises".

Bury Council would like clarification on whether this therefore means that garden waste collections are required to be delivered to all residents that request it, and in the equivalent way to the delivery of a residual waste service, or whether (as per the EA 1990), local authorities can determine whether some properties are unable to be serviced, due to inaccessibility and/or cost.

Q14. The guidance outlines that anaerobic digestion is the preferred method for treating food waste, where suitable, but composting is also permitted. Do you agree or disagree with the content of this section?

Disagree

Please also see our response to Q7 on the exemption for the co-collection of food and garden waste. There are a range of technologies available now and no doubt developing in the future for the treatment of organic wastes. We consider the government's analysis of food waste treatment ignores other technologies, for example dry AD for mixed garden/food. Research commissioned by GMCA indicates dry AD performs better than wet AD from a carbon and financial perspective. Additionally, the government has gone to lengths to exempt mixed organics collections which can also be treated via in vessel composting. The Statutory Guidance should be technology neutral.

Further content should be added (please explain why further content should be added)

A greater exploration of dry AD and in vessel composting technologies and/or a leaning towards technology neutrality.

Q15. The guidance outlines a backstop on the frequency of collection of residual waste, to protect householders' local amenity. Do you agree or disagree with the content of this section?

Disagree

Content should be removed (please explain why content should be removed)

Bury Council considers this minimum service standard should be dropped, not just the content removed. With regards to the last statement, "the government actively encourages councils to collect

residual waste more frequently than fortnightly”, this does not align with core waste prevention principles, nor does it encourage residents to recycle as much as possible nor has Government provided any evidence base to support this minimum service standard. There are numerous WRAP reports demonstrating that limitations to residual waste collections and increases to recycling opportunities maximises recycling rates. Weekly residual collections only discourage residents from making the effort to recycle. It is also unaffordable to local authorities.

To be clear from the outset, as with all/any waste collection service the Bury Council do not and will not impose even a fortnightly residual waste collection frequency on properties that are not suitable for it. For example, it is not imposed on communal properties where there are communal bins stores with limited space. In this case one size does not fit all.

WRAP has clearly demonstrated that restricting residual waste capacity either through the utilisation of smaller volume wheeled bins or a reduction in collection frequency increases the volume of recyclable/compostable materials collected improving recycling and carbon performance. The evidence from Greater Manchester and Bury simply confirms this finding.

Performance impacts

It has been clearly demonstrated by WRAP and others that if the capacity for residual waste is constrained the capture of recycling and composting increases. Therefore, inevitably, the imposition of three weekly residual waste targets will adversely impact recycling performance.

When Bury Council went 3 weekly, we saw a reduction of residual waste over 5,000 tonnes in non-recyclable waste and increase of recycling tonnage of over 2,800 tonnes. The recycling rate in Bury went up over 13%.

The removal of that capacity constraint (in this case providing an extra 40 litres of capacity each week) will reverse the performance reducing recycling rates by around 10%.

Resources impacts on requirements.

In the draft Statutory Guidance GMCA notes the sentence “The expectation is that households should receive an equivalent collection service for recycling as they do for residual waste”.

Clarification is required as to what exactly Defra mean by this.

We have interpreted this to mean that the frequency of residual waste collection and collection of recyclables should be the same. If our understanding is correct Bury Council will also require changing the frequency of our recycling collections. This will require further financial increased in costs for vehicles, staff, fuel, and depot space. The potential financial burden for the recycling would be in excess of £3 million per annum.

As government will be aware, across Greater Manchester all LA's have been working hard to address issues of air quality over recent years. Measures are being taken and investigated to reduce the impact of traffic on air quality. Whilst refuse collection vehicles used by local authorities are generally of the latest emissions standards it is still not desirable to have to introduce measures that increase numbers of large vehicles on GM's Road network with the accompanying air quality and carbon emission consequences.

Increases in costs.

The cost impacts of the imposition of fortnightly residual waste collections fall on both the waste collection authorities and the waste disposal authority (although this ultimately is a cost born by the districts through the Levy).

Impacts on disposal costs.

The imposition of three weekly residual waste collections will have an impact on both waste flows through GMCA's facilities and costs as, inevitably, recyclable, and compostable wastes move from their streams into residual waste. As waste is pushed down the waste hierarchy, the costs of treating it increase. It is estimated that an increase in residual waste (around 23,600 tonnes) will result in an additional treatment cost of £3.2 million per annum.

Strategic considerations

Through its 25 Year Environment Plan the government has set several waste-related targets to be met by 2042 and interim targets for 2028. The targets that directly relate to residual waste are:

- By 31st January 2028:
 - the total mass of residual waste should not exceed 437 kg per capita and 25.5 million tonnes; and
 - the total mass of municipal residual waste should not exceed 333 kg per capita in the most recent full calendar year.
- By 2042:
 - total mass of residual waste to not exceed 287 kg/capita; and
 - halve residual waste per person by 2042 from 2019 levels.

These are ambitious and challenging targets and for those local authorities that have a contribution to make they wish to use every tool available to them to meet them. These tools include but are not limited to:

- Providing comprehensive, simple, effective, efficient, frequent, and reliable kerbside recycling schemes for residents and businesses that generate high quality materials for the reprocessing markets;
- Providing regular (at least weekly as a minimum) and reliable food waste collection services;
- The delivery of frequent, fresh, and innovative communications to inform, engage and encourage residents and businesses in the use of their recycling and composting bins ahead of the use of their residual waste bins; and
- The regular review of the collection frequency and container capacity provided across all the streams with the flexibility to alter any parameter that best achieves the aims of effective, efficient, simple, and comprehensive services.

Removing the ability of local authorities to freely adopt the recommendations of service reviews as regards waste stream collection frequency (especially for residual waste) will make the achievement of the relevant targets in the 25 Year Environment Plan very difficult. This then has significant

implications for achieving carbon reduction and the cost of services (as demonstrated *elsewhere in this response*).

In addition, one does wonder whether, when these targets are met, the amount of waste volumetrically remaining in the residual waste bin will even warrant a three-weekly collection let alone a fortnightly one. As the government itself says in relation to recyclable waste “As volumes of...waste may change over time, we recommend that local authorities consider regularly reviewing the collection frequency and container capacity provided.” – this should equally apply to the residual waste stream.

Government has stated its intention to apply the UK Emissions Trading Scheme (‘UKETS’) to energy from waste (EfW) plants seeing the introduction of a levy of the combustion of fossil carbon (plastics). Based on existing tonnages this could cost GMCA around an additional £38/tonne (circa £15 million per annum).

Mandating the collections of pots, tubs and trays and plastic films for recycling will go some way to assist in the reduction in the impact of this new cost burden. However, as demonstrated elsewhere, GMCA’s ability to reduce this burden further will be reduced if the minimum service standard to residual waste collection is imposed – this will have a direct cost impact on the council taxpayers of Greater Manchester that could be avoided if local authorities had the power to choose what works best for them locally.

Amenity and other impacts of three weekly residual waste collections

The government states “...councils should collect residual waste to protect local amenity and the local environment” and “Government wants to ensure that householders can dispose of putrescent or odorous waste frequently.”

We note that the consultation and draft Statutory Guidance was not accompanied by an evidence base or any form of impact assessment. These will have gone a long way to providing any credibility to the government’s comments on smelly waste and detriment to the amenity. In the absence of any such evidence it is difficult to give them any weight particularly given the significant financial and performance impact that will arise from this minimum service standard.

The government is mandating the weekly separate food waste collection to every home. In reality, some types of properties (such as communal residences where bin store capacity is at a premium) are likely to receive a collection of the “smelly” fraction of waste more often than weekly. As demonstrated elsewhere in this response – a restriction in residual waste capacity through reduced collection frequency or reduced container capacity drives up recycling removing ever greater quantities of “smelly” waste from the residual waste stream. The retention of the flexibility to manage residual waste capacity as local authorities see fit (through the government recommended regular review of collection frequency and container capacity) will make a considerable contribution to what the EPR regime refers to as effective and efficient services.

A note on the methods to restrict residual waste capacity to drive recycling.

As demonstrated clearly above, restricting the capacity for residual waste provided to householders has a positive impact on the quantity of recyclable and compostable wastes collected.

There are two methods of restricting residual waste capacity (i) using smaller bins (for example those with a 140-litre capacity collected fortnightly or (ii) using a 240-litre bin collected three weekly. These provide roughly the same weekly volume for the disposal of

this waste stream.

It could be argued that to avoid introducing three-weekly collections local authorities could provide residents with smaller containers and achieve the same ends. However, there are two significant cost implications – (i) the cost of swapping the containers and (ii) the cost of collections.

(i) The cost of swapping containers

Virtually every local authority has invested heavily in the provision of waste containers. In most cases these have a volume of 240 litres, and these can have a life span of 20+ years. In general, these are purchased outright using capital with perhaps internal repayment mechanisms in order to ensure capital reserves are not unnecessarily depleted. Taking the decision to introduce smaller bins to drive recycling with require:

- The purchase of large number of new smaller containers with the associated delivery and promotion of the change service (estimated cost per household - £17.00);
- The recovery of the redundant containers – a significant cost that may be offset a little by a scrap value; and the
- Continued cost of the internal recharge of the redundant containers.

In addition, the move would be contrary to the waste hierarchy as perfectly serviceable containers will be replaced before they needed to be, and this comes with reputational impacts.

Many authorities over several years of budget challenges have used reserves for a number of purposes. The unnecessary use of them to fund such changes in containers is not viewed positively when uncertainly across a number of areas of service delivery remain.

(ii) The cost of collections

Under the EPR regime the costs associated with the delivery of effective and efficient waste services is the paramount consideration. Swapping bins without the change in collection frequency does not contribute to the cost element of effective and efficient whereas reducing collection frequency clearly does.

Moving from a fortnightly to three-weekly service means that resources are far more effectively and efficiently deployed resulting in a cost reduction of around xx% and, crucially, the reduction in residual waste and uplift in recycling quantities. These all contribute to the prudent management of public money and the achievement of the government's own 25 Year Environment Plan targets.

Achieving net zero

The waste management sector has made significant gains in reducing the carbon emissions from the sector. GMCA itself:

- landfills less than 2% of its residual waste seeing significant quantities of renewable energy generated as a consequence;
- achieved a household recycling and composting performance of just over 50% in 2021/22 for the first time – quite probably the best performance for any English city region;
- reduced the number of collection vehicles on its roads through the regular review of services, innovation, and partnership and;
- installed 8 MW of solar generation capacity on closed landfills.

The Mayor of GM has set a challenging Net Zero target date of 2038 for the city region. The Waste and Resources Service and its constituent local authorities recognise they have an important part to play and are determined to maximise their contributions to that target. The imposition of a limit to the collection frequency of residual waste will set GMCA back resulting in the reduction in recycling volumes and more large collection vehicles on the roads all resulting in more carbon dioxide and its equivalents being emitted.

Summary

In summary, Bury Council, the removal of the ability to collect residual waste on a three weekly basis will result in:

- a reduction in recycling performance of around 10% reducing our ability to meet the interim and long-term targets for waste in the government's 25 Year Environment Plan;
- increased annual revenue cost burdens of:
 - £3.2 million per annum estimated for residual waste treatment; and
 - Additional collection costs estimated to be well in excess of £3 million per annum.
- increased exposure to UK ETS costs in the future as quantities of residual waste and the plastics in them increase;
- increased heavy vehicles on Greater Manchester's Road network; and
- the removal of a key and proven tool for local authorities to drive up recycling whilst balancing costs.

Q16. The guidance outlines that anaerobic digestion is the preferred method for treating food waste, where suitable, but composting is also permitted. Do you agree or disagree with the content of this section?

Please see response to question 14 above. The same applies to non-household waste. Our response to Question 14 was as follows:

There are a range of technologies available now and no doubt developing in the future for the treatment of organic wastes. We consider the government's analysis of food waste treatment ignores (for example) dry AD for mixed garden/food. Research commissioned by GMCA indicates dry AD performs better from a carbon and financial perspective. Additionally, the government has gone to lengths to exempt mixed organics collections which can also be treated via in vessel composting. The Statutory Guidance should be technology neutral.

A greater exploration of dry AD and in vessel composting technologies and/or a leaning towards technology neutrality.