

**National Assembly for Wales**  
**Environment and Sustainability Committee**  
**RW 30**  
**Inquiry into recycling in Wales**  
**Response from: Chartered Institution of Wastes Management**



**The Chartered Institution  
of Wastes Management**

**CIWM Cymru Wales**

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Committee Clerk,  
Environment and Sustainability Committee,  
National Assembly for Wales,  
Cardiff Bay,  
CF99 1NA

Monday 9 June 2014

**Dear Sir or Madam**

**RE: National Assembly for Wales Inquiry into recycling.**

We have received an invitation to provide evidence to the inquiry into recycling.

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 6,500 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste and resource management industry and has various grades of membership determined by education, qualification and experience.

The Cymru Wales Centre Council of the Chartered Institution of Wastes Management welcomes the opportunity of contributing to the inquiry into recycling.

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste management and resource industry. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the sustainable management of all wastes.

The inquiry invite sought response in the following areas.

- i. Explore reasons for and impacts of variations in local authority household waste recycling practice in Wales.
- ii. To what extent local authorities' recycling practice aligns with the Welsh Government's Municipal Waste Sector Plan Collections Blueprint, and to explore barriers and enablers to adherence.
- iii. Assess the availability of information and guidance to householders about why and how they should be recycling, and to explore potential barriers and enablers to improving recycling rates.
- iv. Explore Local Authority reactions to the recently published Waste Regulations Route Map and the potential impacts and implications of this on recycling practice across Wales.
- v. Gain greater understanding of the relationship between recycling collection practice and recycling rates.

- 1.1 Welsh Government (WG) has many policies in their waste strategy aiming towards increasing the quantities of waste recycled and the quality of the secondary materials produced as a result. The policies are geared towards improving the use of secondary raw materials (recycled wastes) within industry in Wales and to move towards a circular economy where all waste materials are used rather than disposed. In addition a Cradle-to-Cradle design thinking needs to be adopted/pursued to enable the circular economy to work, including designing out waste wherever possible. Where this is not possible, then products need to be designed to be constructed using materials that are abundant both now and in the future reducing reliance on scarcer materials. Measures should also be taken to ensure that these materials are kept in use as long as possible though designing for re-manufacture, reuse and recyclability. If this is not possible then the products should at minimum be designed for dis-assembly). These materials should be easily re-useable or recyclable to enable effective access to component and materials separation which is fundamental for efficacious recycling and reclamation of materials.
- 1.2 WG have targeted the wastes collected by local authorities in the first instance because of the high level of government control over this waste stream through the balance of local government finances provided by the WG relative to the council tax payments and additional ring fenced grant money such as the annual Sustainable Waste Management Grant. For the private sector, government influence is through waste legislation and impact on economic growth must be considered. There is a need for 1. More partnership working between authorities and 2. The development of consistent applications and solutions across the whole of Wales, wherever that is possible – all based upon robust evidence and real data, this requires full disclosure of such data by all into the public domain.
- 1.3 The local authorities in Wales have made huge increases in the amount of waste they collect for recycling since 1998-99. In 1998-99 only 5 per cent of all local authority municipal waste in Wales was collected for preparation for re-use, recycling and composting. This has risen to over half of all waste collected by Welsh local authorities in 2012-13. Wales is the only UK country to have introduced statutory local authority recovery targets for waste recycling and, collectively, Welsh local authorities achieved the first target of 52 per cent in 2012-13. Individually, 13 of the 22 local authorities in Wales met or exceeded the 52 per cent target in 2012-13. More emphasis is needed on reuse as this has higher greater social, economic and environmental benefits than recycling, but is more difficult to measure. Also a metric to measure carbon benefits may be helpful in judging the outcomes of Wales' waste policy.
- 1.4 In addition between 2004-5 and 2011-12 there has been progress with reducing the amount of waste produced by households in Wales. The total amount of local authority household waste in Wales, excluding abandoned vehicles, generated in Wales peaked at over 1.57 million tonnes in 2006-07. It has since then been steadily reducing, with 1.35 million tonnes generated in 2011-12.
- 1.5 Additional finance provided by WG to local authorities known as the Sustainable Waste Management Grant (SWMG) commenced in 2001-02 and has increased substantially over the years. The SWMG finance has been allocated according to Barnett formula and totals across Wales from £1.5 million in 2001-02 to £71 million in 2012-13 totalling £473.5 million over that period of time. In addition to this revenue funding there have been specific capital allocations and associated revenue allocations available to local authorities from WG to support the development of recycling and to support sustainable waste management infrastructure for separately collected food waste through anaerobic digestion and residual waste treatment. The provision of this ring fenced finance has enabled local authorities in Wales to increase their recycling rates and decrease the amount of waste they collect as noted above. More of this funding needs to be used for reuse and other waste prevention outcomes. More funding is needed in total across the board if the Welsh strategy is to be achieved.

- 1.6 The WG Municipal Waste Sector Plan Collections Blueprint issued in 2011 sets out recommended service profile for the collection of waste from households. However, many local authorities had already started recycling service provision many years before in order to comply with requirements to divert waste from landfill under the Landfill Allowances Scheme (Wales) Regulations 2004. This has resulted in each local authority delivering services in different ways. WG offers all local authorities the opportunity to participate in a Collaborative Change Programme on the delivery of services. This aims to ensure that Wales meets the high recycling targets set out in Towards Zero Waste and follows the Collections Blueprint delivery model.
- 1.7 The delay in providing the detailed advice on WG's preferred method of collection of wastes for recycling through kerbside sort, (although this method was encouraged in the previous waste strategy for Wales 2001 "Wise About Waste"), has contributed to the local authorities in Wales adopting diverse methods for the collection of wastes for recycling from households. The advice should be reviewed in the light of evidence in the next few years.
- 1.8 The costs of changing the type of recycling waste collection service can be considerable taking into account the provision of bins and boxes, together with the specialised collection vehicles. These costs together with practicalities of rolling out a new service (i.e. communicating these changes with residents), means that it takes considerable time to implement changes across the entire local authority area. In addition, even after roll out, there will be local issues where it may not be possible to provide the same collection service for all dwellings within a local authority such as densely populated areas (i.e. flats) and sparsely populated areas (i.e. rural areas).
- 1.9 The result obtained by local authorities in terms of recycling percentage against their service profile does not provide evidence of a link between performance and collection method, see Table below. Accuracy of data, actual tonnages and recyclate quality are also highly important to this point.

kerbside sort	2012-13 % recycling	rank	single stream commingled	2012-13 % recycling	rank	single stream - glass	2012-13 % recycling	rank	twin stream	2012-13 % recycling	rank
Anglesey	55.2	6	Cardiff	52.2	13	Pembrokeshire	53.1	11	Monmouthshire	55.5	5
Gwynedd	51.2	15	Denbighshire	58	1				Blaenau Gwent	51.2	14
Conwy	56.4	4	Caerphilly	57.1	3				Swansea	47.5	20
Flintshire	54.9	7	Vale of Glamorgan	54.5	8				NPT	48.3	19
Powys	50.9	16	Merthyr Tydfyl	49.1	18						
Newport	49.2	17	Ceredigion	53.6	10						
Bridgend	57.1	2	Carmarthanshire	53.8	9				>55%		
Wrexham	52.8	12	RCT	46.2	22						
Torfaen	47.1	21							<52%		

- 1.10 Recent changes to the regulatory framework in respect to Material Facilities (MFs) coming into force on 1<sup>st</sup> October 2014 and provisions with respect to separate collection of materials for recycling coming into force on 1<sup>st</sup> January 2015 are pertinent to the issues subject to this inquiry. The effect of these regulations will be to increase the transparency of the reject rates and the quality of materials produced by all MFs, together with the quality of the materials supplied by each supplier. This will enable local authorities to better target their advice to householders to improve the quality of the materials they deliver to MFs for sorting and to choose the MFs that they use with evidence regarding the efficiency of their sorting practices. However, it is our view that it is too soon to provide analysis of this given that these regulatory developments have not yet been implemented.

- 1.11 Given that during the next few years it will be possible for local authorities to understand the actual amounts of the different materials that they send to MFs that is recycled, it may be sensible for surveys of the quality of materials collected through kerbside sort methods as a comparator for Welsh authorities. It will need strong leadership to ensure the correct protocols and techniques are adopted.
- 1.12 One such study was produced by Zero Waste Scotland but this only contains a small amount of data from Welsh local authority collection schemes.
- 1.13 We feel it would be important for WG to institute Wales wide analysis of the quality of materials collected through kerbside sort methods to assist local authorities in Wales making decisions in relation to their compliance with the requirements for separate collection given that co-mingled collection of materials for recycling is permissible provided the materials leaving the facility are of comparable quality to kerbside sort methods of collection of materials for recycling. The evidence of the comparability of quality in the outcome between kerbside sort and outputs from MFs following comingled collection would be important for local authorities in service delivery choices and to ensure resilience of markets for the materials.
- 1.14 The [WRAP regulatory road map](#) details the process that local authorities should go through to document their decision making process with regard to technical, environmental, economical, practicable (TEEP) test. Within that guidance if it is not clear that separate collection would increase the quantity or quality of the materials recycled then it is possible that change from comingled collection would not be required. In order to have evidence available to local authorities in Wales on the quality of materials provided by kerbside sort further evidence of the quality of materials derived from kerbside sort collection.
- 1.15 More guidance for households is required on what can be recycled through each council's collection scheme including reuse opportunities locally available and the need for waste prevention. This could be achieved through local events.
- 1.16 CIWM Cymru is of the opinion that there is a need to establish the full benefits that recycling/re use provides to the individual and local community, this then needs to be communicated and readily available for individuals to access. Such information to be provided should include:
- a) Where the individual materials are taken for re-use/recycling processes
  - b) What types of new products are produced from the recycled materials.
  - c) Geographically within Wales how many jobs have been directly created from recycling?
  - d) What social, economic and environmental wealth recycling is contributing to the national and local economy?

This information should be available in a simplistic, easy to read format, that can be easily accessed by the public to demonstrate the benefits that are accruing to them and their local community by them actively participating in recycling of their household waste. This would provide a direct incentive to increase future participation. This information needs to be regularly updated and relevant.

Should you have any query with regards to our response, please do not hesitate to contact us.

Kind regards

**Celine Anouilh**  
**CIWM Regional Development Officer for Wales**

**(For CIWM Cymru Wales)**