



Submission: Inquiry into Recycling In Wales

NAW Environment & Sustainability Committee

Introduction

1. Monmouthshire County Council (MCC) welcomes the opportunity to give evidence to the Environment & Sustainability Committee’s inquiry into recycling in Wales. MCC has always been within the top quartile of recycling performance and over 2013-14 made national headlines for its bold and brave approach to waste management to increase recycling and reduce costs.
2. We fully recognise that waste and recycling is one of the few services that touches every household every week. It is often the service people most associate local government with and is also the benchmark on how people judge the performance of their local Council. We dare not get it wrong. First and foremost it is a service to our public and only in the last 10 years have we seen a change in its primary purpose. What was introduced to promote and protect public health the waste service is now very much seen as a means to promote and achieve environmental and sustainability objectives.

In 2013-14 MCC managed almost 46,000 tonnes of waste. This is made up of:

	Dry Recycling & Reuse	Food/Garden	Residual	Total	% of total collected
Kerbside	10,403t	8,391t	7,661t	26,455t	58%
CA Site	6,784t	3,252t	5,713t	15,749t	34%
Bring Site	171t			171t	0.3%
Other		195t	3,359t	3,554t	7.7%
Total	17,358t	11,838t	16,733t	45,929t	100%
% performance rate	38%	25%	36%		
	63%				

3. The above figures give us a total recycling rate of c.63%, 11 per cent over and above the statutory target for 2013-14 of 52%.

4. As the above figures demonstrate kerbside collections are a major contributor to the recycling performance, and indeed if you just look at kerbside collections only a combined recycling and composting rate of 71% was achieved. However it is important to note the importance of CA sites (household waste recycling centres) to our overall service. Kerbside collections cannot be taken or assessed in isolation. Our statistics also rightly report all waste managed by authorities and includes items such as waste fly tipping, trade waste, asbestos collected etc.
5. MCC is very pleased with the 63% recycling rate and this is a 7% increase on the previous year. This performance we believe is due to:
 - Informed and engaged residents who are largely compliant with Council policy
 - Restriction on kerbside residual waste (the tightest allocation in the UK)
 - An easy kerbside dry recycling service which is comingled
 - Charging for kerbside garden waste collections
 - Having 4 CA Sites in the right locations for our residents
 - Good contracts in place for managing and reporting dry recycling
 - An active trade waste market in the region which means we only collect a small proportion of trade waste

Reasons for and Impacts of Variations in Local Authority Household Waste Recycling Practice in Wales

6. Under the Environmental Protection Act 1990 Councils are defined as collection and disposal authorities. In Wales due to the Unitary status of the councils the responsibilities for both collection and disposal falls on all 22 LAs. The EPA gives Councils the powers to define the collection method appropriate for their area and determine the receptacles (both type and volume) which must be used by the householder. The Act also gives Councils the powers, which MCC have not yet adopted to use, to fine if the correct method of collection is not followed.
7. Therefore when asking why Councils have done and remain to do things differently the history of this can be traced back to the EPA in 1990. Even before recycling was introduced there were differences in residual waste collections with some adopting wheelie bins, and others, like MCC remaining a sack based authority.
8. Recycling collections must also be seen within the wider context of the Welsh Government – Local Authority partnership and approach to service delivery. Councils are competent bodies and WG since its first waste strategy ‘Wise About Waste’ supported Councils to determine the path which is right for their area taking into account things like demographics, the topography and importantly their financial situation. Whilst WG over the years have made their view on the most appropriate collection methodology quite clear, it remains firmly as policy, it is not prescriptive or definitive in law.

9. MCC, like many Councils, have had a few iterations of recycling collections as the market and knowledge of managing materials have matured. At first paper collections were introduced via the private sector and we saw the growth of bring banks, and then following WG policy we worked closely with the third sector to introduce compliant kerbside sort collections in the County. However in 2009 the Council switched to an in-house twin stream comingled system and the following year introduced fortnightly residual collections.

Alignment with Welsh Government's Collection Blueprint – Explore Barriers & Enablers to Adherence

10. MCC is not currently compliant with the WG Collections Blueprint. We are undertaking a review which involves working with WG and their agents WRAP to model future collection options. We believe that recycling is still in its infancy and we must continually look for improvement to maximize market and technology opportunities. One of our 6 collection options is the WG blueprint model, but MCC will not be making a decision on collections until Autumn 2014.

11. However looking at our current system we believe that:

- The public like the ease of the collection method – as evidenced by an independent survey in 2012
- Our service doesn't create any street litter – the streets remain clean as the material is all bagged
- Operationally and financially it is very efficient (as proven by the WLGA benchmarking process)
- We are compliant with all our statutory requirements including end destination reporting
- It is safe with minimal RIDDOR reports to H&S Executive on workplace accidents
- It is high performing and we believe that performance would drop if we went back to kerbside sort

12. Therefore when asking why MCC is not blueprint compliant we must look at all the factors that inform the development of the service, look at the journey we have come on to achieve 63% recycling and continually review to ensure what we are doing is right for our residents, is compliant with law, and that we have had regard to but not necessarily definitively follow national policy.

Availability of Information to Households

13. In July 2013 we introduced a major change to the residual waste service we undertook a major communications and engagement campaign. This included:

Pre Change

- A leaflet in the Council tax notification that change was coming

- Local press releases and briefings
- Attendance at over 20+ Town & Community Council meetings
- Attendance at partnership forums

During June

- Delivery of a recycling pack to every household in the County



- In the pack there was a leaflet explaining how to use the service
- Press releases
- Eye on Wales documentary on the changes MCC were making
- Roadshows in the community to help people
- In-bus and train station adverts
- Headlines on national BBC, Radio 5, BBC Breakfast & most read item on sat 22nd June on BBC Online
- Social media countdown (Facebook and Twitter)

Over July

- Roadshows
- Household visits for those who requested additional support
- Further press & publicity

14. Understanding of the recycling services can be seen from compliance with the system as defined by the LA. In MCC we were very pleased with the public response to our changes and believe that without this intensive engagement campaign we would not be reporting a 63% recycling rate for 2013-14.

15. For us communications is more than what information the householder receives. It is also about the quality and ease of the service. If it is easy to understand and easy to manage at home, then there will be higher performance.

16. We also understand though that there are barriers to recycling in all aspects of life. For example houses of multiple occupancy face more difficulties, flats where there is limited storage space struggle and there is still a small percentage who do not believe that recycling is worthwhile. It is our job though, as collection authorities to engage with all parties, and help find the most appropriate solution for an individual circumstance to get the best result for our residents.

Reaction to WRAP Routemap

17. MCC has reviewed the Routemap and more importantly the WG current consultation on application of the revised Waste Framework Directive (rWFD) requirement for separate collections. Our response to this is incorporated within our recycling review as described above.
18. The rWFD makes it clear that there is a requirement for separate collections of paper, plastic, glass and metals where **necessary** and **practicable** to do so. The EU have recognized that member states and competent authorities (such as LAs) all come from a different place on the recycling journey and so the requirements are not prescriptive but able to be looked at from appropriate circumstances – i.e. through the application of the necessity and practicability tests. As a comingled LA we must therefore go through a process of ensuring that the materials produced from our recycling collections are of a similar quality and **quantity** (comingled collections get higher yields) to that produced from a good system whereby materials are collected separately, and if this is proven not to be the case then we should implement separate collections for metals, glass, plastics and paper where technical, economic and environmental practicability.
19. Our review will look at the performance of different collection options and we are also currently looking how our materials are managed compared to kerbside sort LAs. Obviously as a comingling LA we use Materials Recycling Facilities and work with the private sector which probably have more access and opportunities for market development and innovation compared to a Council. For example we are currently in contract with Biffa who recycle milk bottles back to milk bottles in their innovative polymer plant and indeed have won awards for the process.
20. As a Council we are also mindful of other duties and legislation which we must have regard to through this process. Under the Local Government (Wales) Measure (2009) Councils have duties to take into regard when planning services:
 - Strategic effectiveness
 - Service quality
 - Service availability
 - Fairness
 - Efficiency
 - Innovation
21. WG’s waste strategy and the rWFD consultation are solely focused on sustainability, yet sustainability is only one of the considerations that we must have regard to when exercising our statutory functions. What is also disappointing in the WG consultation is dismissal of our citizens’ voices in our decision making processes. We believe that the citizen should be at the heart of our service and would want to take their views, aspirations and needs fully into account.

Relationship between Collection Practice and Recycling Rates

22. It is a known fact that comingling services produce higher yields i.e. collect higher tonnages. Yes some of this maybe “contamination” but when looked at holistically the tonnage post contamination is still equivalent to that produced by kerbside sort. It is not surprising therefore that the majority of high performing LAs in Wales on total recycling are comingled of which MCC is one. Kerbside sort can be high performing, we do not dispute that. However MCC can only speak from experience of running both systems and seeing yields, participation and also satisfaction increase with the introduction of comingled services.

23. However there are other factors which influence recycling rates:

- Demographics
- Age of the population
- Housing type
- Topography
- Population movement – students, tourists etc
- Settlement type (urban, rural)
- Attitude
- The quality of the service (irrespective of collection method)
- Restriction on residual waste
- Number of bring banks
- Number of CA Sites
- Prevalent (or not) of trade waste operators
- Overall quality of the local environment

24. A simple correlation cannot be drawn between recycling method and performance. In MCC we do believe our system is in part down to our collection method, but we also benefit from having the positive factors mentioned above. We have 4 household waste recycling sites, we have minimal bring site provision so there isn't competition with kerbside, our crews are well trained, we do not have large movements of population e.g. students or tourists etc. Our service is high performing and for the most part we must thank our residents for their continued participation and involvement in the service.

Conclusion

25. Recycling collections and performance is complex. It is a continually evolving process which will continue to change as markets and technologies develop. MCC is proud of its service, its performance and primarily our residents. We have to ensure that whatever we do is right for our citizens and it leads to positive outcomes. They have to be at the heart of the process.

26. MCC would be more than willing to participate or provide further information to the committee should you find it beneficial.

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