

National Assembly for Wales  
Environment and Sustainability Committee  
RW 36  
Inquiry into recycling in Wales  
Response from: Vale of Glamorgan Council

Date/Dyddiad	10 <sup>th</sup> June 2014	The Vale of Glamorgan Council
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Committee Clerk,  
Environment and Sustainability Committee,  
National Assembly for Wales,  
Cardiff Bay,  
CF99 1NA.  
[ES.Comm@wales.gov.uk](mailto:ES.Comm@wales.gov.uk).

Dear Committee Clerk

**Re: The National Assembly for Wales' Environment and Sustainability Committee inquiry into Recycling in Wales.**

Can I thank the Committee for the opportunity for me to provide Welsh Assembly Government's (WAG) with my views, comment and suggestions in respect to their call for evidence relating to the Environment and Sustainability Committee's inquiry into recycling in Wales.

The views express herein are mine and do not necessarily represent the views of the Vale of Glamorgan Council, its elected Members, Executive or any other senior officer. Neither does it supersede any other response that you may receive from the Council, but should be taken into consideration in parallel with any other such responses.

It is my belief that Welsh Government (WG) in setting policy for the recycling of controlled waste in Wales have lost sight of the fact that EU Directives are overarching principles and not cast-iron requirements and that it is up to Member State to decide how they will implement the Directive(s) to achieve compliance with its requirements .

I accept that a Member State may choose to "*gold plate*" its implementation rather than do the minimum to comply with the overarching themes contained within a Directive and that is a decision for that Member State. However, I do have some difficulty comprehending the situation where different parts of a Member State choice to implement it to varying degrees such as appears to be the case between Defra and WG in respect to waste recycling. It is my opinion that the way that WG are applying the Revised Waste Framework Directive (rWFD) goes significantly beyond the way that the rest of Europe, to say nothing of England, has applied the Directive and WG appear to be going far in excess of its actual requirements and in their

interpretation of the law relating to recycling is very narrow and restrictive and in itself possibly open to challenge.

It is also a concern, that WG guidance is legally binding and there will need to be provided some common sense clarity, particularly on the contentious issue for us and many other Welsh local authorities of whether the UK as Member State is required to set up separate of waste or should allow comingled collections within the rWFD where there are justifiable 'life –cycle' thinking, taking into account economic viability and social impact that allow Member States to depart from the waste hierarchy as stated within Article 4(2) of rWFD. So whilst accepting setting up a separate collection as prescribed with the WG collections '*Blue Print*' clearly the choice of collection is also subject to the principle of 'Proportionality' and subject to Article 10(2) rWFD subject to necessity and technical, environmental and economic practicability.

I would also maintain that if WG's aim is high-quality recycling, then the introduction of a separate collection system is not, in itself a guarantee of obtaining high quality which depends on the producers presentation of the waste and can equally be achieved form of co-mingled collection. It can be equally be said that the education of the producer is a critical path to achieving high-quality recycling irrespective of the mythology used for collecting the waste materials.

I would also point out to the Committee that the financial consequences of requiring any significant recycling service change in these austere times for local authorities is potentially dire and I have to wonder whether the impact of do so may have adverse impacts on other local authority service provision such as the provision of social services, leisure and non-statutory functions such as public conveniences or coastal access.

Clearly the costs of us changing the type of recycling waste collection service to that required by WG will be considerable taking into account the provision of bins and boxes, together with the required specialised collection vehicles. These costs together with practicalities of rolling out a new service (i.e. communicating these changes with residents), means that it will take a considerable time to implement changes across the entire local authority area. In addition, even if force by WG to do, after roll out, there will be significant local issues where it may not be possible to provide the same collection service for all dwellings within our local authority area, such as densely populated areas (i.e. flats) and sparsely populated areas (i.e. rural areas).

WG delays in providing detailed advice on their preferred method of collection of wastes for recycling through kerbside sort, although encouraged in their 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. It now seem unfair that legislation and draft guidance are now almost forcing decisions at brake neck speed without there being sufficient time to fully consider the opinions or the consequences for local authority or their residents.

Whilst WG may feel, that in legal terms, that citizen engagement and their policy effects on our customer satisfaction have no bearing on the implementation of recycling collection methodologies, perhaps the results of the recent European Elections would suggest that public dissatisfaction can give rise to political issues and impact on the outcome of looming elections with Wales. Given the popularity and support that our residents now show for the current co-mingled service following our change from source segregated to co-mingled collections in 2011. I would have concerns that any displeasure from having to revert to our previous collection system could impact on forthcoming political elections.

For the Committees information, since the Vale of Glamorgan Council changed to a co-mingled dry recycling collection service in 2011, not only have our capture rates significantly improved, so have our customer satisfaction levels. Satisfaction levels now exceed 90% and following many of our householders hearing about the Environment Committee review of recycling have contacted us to express their support of the existing collection system in the Vale. No resident has contacted the Council to ask that it return to a source segregated collection service. I have attached our customers comments for the Committee's information within this submission and although I understand that the preferences of local authorities and their constituents is immaterial to current WG consultation on recycling. I would hope that this is not the attitude of this Committee in carrying out their review of recycling.

The Vale has worked hard to establish a sustainable, affordable and practical solution to its pre-2011 failing recycling performance and changing the service again at this time is likely to be a retrograde step which could result in our failure to meet the 2015/16 statutory WG recycling target of 58% and there is major concern amongst officers and elected representatives that introducing a new regime will do damage our householder's support for the recycling cause. Moreover, it would be perceived by many in the as a blatant waste of money and resources at a time of efficiency saving that are likely to have a negative impact of our overall service delivery irrespective of the general unhappiness with change of a service that is operating extremely well and proving very popular with all our customers.

However, WG have made their views very clear within their current recycling consultation document that they disagree with me and while this is of no surprise to me. It is, however, extremely disappointing that WG have appeared to have based their guidance on a blinkered and self-fulfilling proficiency of their own '*my way or no way*' vision for Welsh waste recycling irrespective of the cost to their individual stakeholders and voters. As one WG official has suggested to us "*there are long standing and principled disagreements between Vale of Glamorgan Council and Welsh Government over policy and practice*" and this does not suggest to me that there is any scope for compromises or negotiation with WG when determining the best future option for the Vale of Glamorgan in continuing its successful co-mingled recycling service.

I feel that the way we need to recycle waste in Wales is not so clear cut and it would be prudent for WG to institute Wales wide analysis of the quality of materials collected through various kerbside collection methods to assist it making decisions in relation to 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 which under the requirements of the rWFD means made into an alternative material and not necessary 'closed loop' recycled into the same material as WG so strongly maintain.

#### Stakeholders Comments received

The Palm House  
8 Marquis Close  
Barry Island  
CF62 5UE

01446 742770

Having read the article in this week's Gem I wanted to add my comments, so followed the instructions to your web site. I found it very difficult to find anything on your web about this, but eventually found a link to WAG. However, I still cannot see how to send them an email - I do not do twitter.

I support our council's current system, compared to some I have seen in other areas, and wish to express my views. Is the WAG being disingenuous in asking for public opinion, yet apparently making it so difficult to do so? I do not wish to, nor could I "make a written statement of evidence".

Any help you can give in enabling me to express my opinion would be appreciated.

William A Cameron

26th May 2014

Dear Sir,

I wish to comment on the fact that the Vale Council appears to be forced to abandon the highly successful 'co-mingling' method of recycling which it currently employs.

To abandon this is very much a retrograde step. The fact that it is being forced by EEC regulation further emphasises the need to re-consider this Country's participation in the EEC, but that is another subject. As far as the recycling is concerned, if householders are forced to separate their recycling into various categories, then in many cases this just will not happen. Either items will end up getting placed in the wrong containers (what happens then - prosecution?!), or you will find that the amount of 'black bag' waste will increase as the easier operation compared to having a number of different containers around the house.

The net effect will be that the proportion of recycling will decrease in relation to general waste.

Please add my voice to any evidence you might be preparing to put forward in defence of 'co-mingling' recycling.

Yours truly,

L.S.Golden

Dear Sirs

Regarding the article in this week's Penarth Times regarding co-mingling,

I and other residents of Meadow Lane, Penarth believe that the present system is well thought out and does exactly what is required. We are of the opinion that the system is fit for purpose and does not require alteration. Bear in mind the old adage- If it ain't broke don't fix it!

Yours faithfully

Roger Mundy

Dear Sirs

I could not find on-line where to place my views on changes to recycling. Please could you redirect as necessary.

I very much appreciate that the Vale of Glamorgan uses the co-mingled method. We are a family of four.

We have a small kitchen/back porch area. I do not have room for various containers. At present I have a slim bin for the black bag in the corner between the inner door and cooker and a food recycle container on my draining board. The co-mingled goes into a plastic bag wedged between the door and the radiator in the same corner. I cannot see how to fit in extra containers and the thought of having to re-assign the collected recycling as a second stage is daunting. It would be hard to motivate myself to do so. Once it is in the bag it is out of mind. I also think I would be more inclined to put plastic wrappers and small things such as lids and scraps of paper into the black bag if i had to handle these again, even though they are clean.

If I were to store my recycling out the back during the week, which means numerous trips into the garden, it will get wet and sluggy and my bin area is full.

I cannot think I am the only person with these problems of space.

Yours sincerely  
Valerie Provence

4 Castle Close, Dinas Powys CF64 4PB

Name: Mrs MarjorieBousie

Email: [marjoriebo@hotmail.co.uk](mailto:marjoriebo@hotmail.co.uk)

House number/name: 49

Street name: Plymouth Road

Postcode: CF62 5TZ

Telephone: 01446746964

Best method of contact: Email

Comments: I wish to add my name to the comments about our recycling system, to say that I am perfectly content with the way our recycling is handled and do not wish for it to be changed, as my husband is 87 and I am 85 and could not stand the hassle of having to separate things up apart from the fact that I would have nowhere to store all the different bags and boxes, I would give up recycling I'm afraid, and I have been doing it religiously from day 1.....

Tell the Welsh Assembly not to interfere with how the Vale Council deal with their/our recycling, it works perfectly well.

The old adage of "Don't Fix What Ain't Broke", springs to mind.

We really appreciate how the system works, in particular the garden waste.

Thank you.

Regards,

Peter Carr. The Old Stable, Flemingston, Vale-of-Glamorgan. CF62 4QJ. Tel: 01446 751605.

[peterecarr@tiscali.co.uk](mailto:peterecarr@tiscali.co.uk)

Please keep the current system which i think works extremely well .Your teams of men are excellent too always friendly in spite of the weather

Mrs Leach Taffinder

37 Cae Leon Barry

I read in the Penarth Times about commingled recycling being stopped and going back to sorting into different bags. I for one think this would be the wrong thing to do and in fact I would stop recycling

Irene Meredith

3 Summerland Crescent, Llandough

Co-mingling is the best method of refuse collection I have seen. It reduces the need for too many boxes/bags and ensures more waste is collected.

Stephen Hughes

18 Rectory Drive St Athan

As a resident of Barry, I would urge the council to keep the current method of recycling. Amongst the many issues involved, where do they expect residents to

keep the many boxes and bags required for the source segregated recycling collection? The current co-mingling, or DMR (dry mixed recycling) works well.

Biffa's own web site states that their DMR method means that cardboard, paper, newspapers, plastic films and bottles and steel and aluminium cans can all be put into one bin before being converted into a reusable commodity through advanced processes at their recycling centres. The DMR system allows us to have fewer waste containers and reduces our time spent sorting waste. Please note their quote, "DMR is an easy and sustainable process that can greatly increase your waste recycling rates whilst reducing costs by not disposing to landfill." If it is easy and sustainable why do we want to change it to inconvenience residence in the Vale?

Prior to the current method, I recall sitting in my car behind a rubbish vehicle watching in amazement as the council workers threw the carefully segregated recycled waste into the same container in the truck.

I hope you listen to the people of the Vale of Glamorgan and not the EU when making decisions about the future of recycling.

Wendy Price

In summary, the Vale of Glamorgan Council and the Welsh Assembly Government share a desire to see as much of our waste recycled as possible and whilst WG might think that we fundamentally disagree with them we do share the view of half the local authorities in Wales and only want to be able to deliver the cost effective, well supported and WG recycling target achievable collection method which we current believe to be co-mingled which we believe is the best way of achieving all of these objectives.

Co-mingling is currently the most economically advantageous method for us to use. More importantly, however, it is the method that Vale residents prefer. This was the case when it was introduced in 2011 and I am confident, remains the case today.

Yours Faithfully,

A handwritten signature in black ink that reads "Clifford Parish". The signature is written in a cursive, flowing style.

Clifford Parish  
Operational Manager Waste Management and Cleansing  
Rheolwr Gwaith Rheoli Gwastraff a Glanhau