

Inquiry into recycling in Wales
Response from: Denbighshire County Council

1. Reasons for and impacts of variations in collection service

- 1.1. The power of LAs to select and specify containers is set out in Section 46 of the Environmental Protection Act 1990. Therefore, the underlying reason why there are variations in collection service is because Government believes that LAs must make the decisions regarding the services they have a duty to provide.
- 1.2. Decisions are based on factors such as the proximity of waste facilities, local housing and infrastructure, the timing of contracts expiring, corporate priorities, Government strategy, prevailing waste theory and the availability of funding. In Denbighshire, the key decisions in these areas have been made based on these and the following factors: -
- 1.3. **Receptacles:** In 2006, started switching residual waste collections from sacks to bins. Key factors were that the public wanted bins as seagulls and other scavengers caused problems with sacks. Bins are a practicable way of avoiding potentially hazardous manual handling and therefore a duty of the LA as an employer. At a time before food waste was collected separately, the Council felt bins were the only acceptable container for fortnightly residual waste collections.
- 1.4. **Frequency:** With a few exceptions, residual waste collections in Denbighshire are made fortnightly. In 2006, the evidence was clear that the reduced collection frequency was a key driver in improving recycling rates. Also, as more waste is recycled, collecting residual waste fortnightly is an effective and appropriate efficiency measure to take.
- 1.5. **Recycling:** Despite operating a “good” kerbside sort scheme, the Council could not ignore clear evidence that mixed recycling collections captured significantly more material. Because the statutory recycling target was set so high, the higher recovery of mixed recycling schemes could not be ignored (a 60% target might have been considered achievable). Coupled with acceptable cost projections and the duty to avoid manual handling referred to above, meant the Council could not justify doing anything other than to collect recycling in a wheeled bin.
- 1.6. **Garden waste:** In 2006, WAG had a specific target for the composting of waste which is why Denbighshire introduced a free collection service funded through the efficiencies achieved in residual waste collection and SWMG. A small 140 litre bin was selected for garden waste to limit quantities collected, but still achieve the WAG target.
- 1.7. **Colours:** Black bins for residual waste and green bins for garden waste are self-explanatory. Blue has long associations with recycling so that was the colour chosen for the recycling bins. Orange was selected for food waste because it was a bright colour, not typically associated with other waste types. The caddies are easy to see in dark mornings. Coincidentally, orange was later selected as the colour of food waste bins at the London Olympic Games in 2012.
- 1.8. The result of the differing systems is a creative and innovative approach to waste management in Wales today and is driving the best performance in the UK. It cannot be argued that the current approach is not working.
- 1.9. A single, uniform approach set out by WG dictat, like the *Blueprint*, might represent the “cutting edge” in waste theory at a given point in time. However, resource management theory is constantly evolving and it is hard to see how a national Waste Collection Authority could deal effectively with local circumstances.

- 1.10. In the June edition of *The Loop* (the journal of the Local Authority Recycling Advisory Committee) The Minister, Alun Davies AM, champions this diversity of approach, saying, “Welsh Councils decide the most appropriate collection systems for their communities...” Denbighshire would agree wholeheartedly with the Minister on this.

2. Alignment with Collections Blueprint

- 2.1 Generally, Denbighshire’s collection system aligns closely with the discretionary *Blueprint* which cites Denbighshire’s use of small 140 litre bins for residual waste. However, Denbighshire uses its discretion to depart from the *Blueprint* in two main ways.
- 2.2 The reasons for using wheeled bins to collect mixed recycling are mentioned earlier. The HSE has itself made this same point in official responses to Government consultations but have not done so in the clearest terms. The *Blueprint* recognises that LAs are “employers and commissioners of services” and that H&S decisions on collection should be made locally – but then goes on to tell LAs what conclusions they must reach!
- 2.3 Denbighshire also departs from the *Blueprint* by offering a garden waste collection that is free at the point of service. Although the specific target for composting has now gone, Denbighshire believes charging could jeopardise the achievement of the 70% statutory recycling target and therefore lead to financial penalties.
- 2.4 The *Blueprint* sets out what was “cutting edge” three years ago; published when some LAs were still collecting residual waste weekly. Wales now has one LA opting to collect residual waste every three weeks and others consulting on monthly collections. In short, it is very much of its time and time has now marched on.
- 2.5 In the past, WAG/WG has adopted various positions which have later been re-assessed in the light of new evidence. *Wise About Waste*, the first Welsh waste management strategy, steered LAs towards MBT (Mechanical Biological Treatment) as a means of residual waste treatment and showcased the use of glass cullet in aggregates: both positions the WG has now distanced itself from. More recently, WAG steered LAs to consider the third sector model for recycling collections, such as the Cleanstream approach used by Newport Wastesavers, but which has proved less successful as targets have become more testing.
- 2.6 In the past, Denbighshire has described such changes of approach as “moving the goalposts” but the ability to switch priorities and change direction is a necessity, and not just for Governments. A national strategy as prescriptive as *Towards Zero Waste* is not helpful to the WG, LAs or any other stakeholder.
- 2.7 Additionally, Denbighshire has long questioned much of the evidence selected by WAG/WG to support its advocacy of kerbside sort schemes. This is clearly illustrated in the *Blueprint* by the claim that Bridgend Council “collect more materials for recycling than authorities using co-mingling”. This was put to the WG at the time but, despite an acknowledgement that the wording used was misleading, no correction was ever made.

3. Availability of Information to Householders

- 3.1 Denbighshire spends relatively little on recycling PR and information: less than any other LA in Wales according to recent WLGA benchmarking data. Recycling just happens to be the way the Council deals with 63% of the rubbish it handles now and, because it is slightly more

complicated than throwing all the rubbish in one bin, the Council provides clear explanatory information and collection calendars.

- 3.2 The right service does not need a great deal of explanation. With the right drivers (i.e. making recycling easy and convenient, and the reverse for residual waste) it is possible to alter behaviour without necessarily going through the expensive business of trying to change attitudes first.
- 3.3 In 2011, 4,223 individuals (the vast majority from Denbighshire) responded to a public consultation to disagree with the proposal that WG should withhold SWMG funding from LAs making mixed recycling collections. These individuals, plus the further 1,173 who signed petitions, that showed support for their simple, convenient recycling service would no doubt be shocked to learn that withholding grant funding is still on WG's agenda.

4. Waste Regulations Route Map

- 4.1 The process outlined by the route map is similar to the approach taken by Denbighshire, and presumably every other LA, when selecting a recycling collection. To a person new to preparing a business case the Route Map sets out the process quite clearly.
- 4.2 Denbighshire is reviewing its services in the light of the Waste Regulations 2012. Early findings suggest that a switch to separate collection is unnecessary to meet quality recycling aspirations. Moreover, given Denbighshire's leading performance, a switch to kerbside sorting could result in a 22% reduction in recycling yields, a reduction of 4.5% on the Council's recycling rate and an additional 2,000 tonnes of residual waste requiring disposal. This is based upon the capture rate for kerbside collected dry recyclables falling to that achieved by the best Welsh kerbside sort scheme (i.e. Bridgend).
- 4.3 The Route Map will probably have minimal impact in itself other than to prompt LAs to undertake a timely review of earlier decisions. For LAs that undertook a robust decision making process in the past there is unlikely to be a change. However, by threatening to withdraw the SWMG funding of any LA switching to mixed recycling the WG is effectively making it impossible for any kerbside sort LA to consider all the options open to it.

5. Relationship between practice and recycling rates

- 5.1 The evidence Denbighshire has gathered indicates that "good" commingled recycling services enjoy greater capture rates or yields than "good" kerbside sort schemes. Is the collection schedule clear and convenient? Do residents understand what can be recycled? Do the collection vehicles turn up? Are suitable containers provided? Is opting out of recycling made difficult by limits on the volume or frequency of collection? If the service is poor then the method makes little difference, but LAs that can run a good service will benefit by offering a commingled collection.
- 5.2 Evidence, such as the data collected after Denbighshire's switch from kerbside sorted to a commingled service, is dismissed by WG on the basis that any "new" scheme will enjoy high participation and capture rates. Unfortunately, there are very few LAs that have switched from a commingled service to kerbside sort; but there is Torbay Council.
- 5.3 Data collected from Torbay appears to show that recycling has flatlined since dropping commingled collections. Prior to the adoption of a kerbside sort service, the Council

provided commingled collection to 40,000 residents and in 2010/11 (the last year of commingled service) reached a recycling rate of 45%. In the calendar year 2013 (the most recent year for which data is available) it can be seen that the kerbside sort service was provided to 60,000 households (a 50% increase) but the recycling rate has increased by just 1% (after food is taken out of the equation).

- 5.4 Some might argue that this is a problem of Torbay's contractor performing poorly, rather than of kerbside sort schemes in general. However, the excellent recovery rates for the food waste scheme would appear to contradict this. In its recent guidance on evaluating recycling schemes, the Welsh Government suggests that the "popularity" of commingled recycling collections cannot be a material consideration when choosing a collection method. However, when there is such clear quantitative evidence to support this popularity by way of improved capture rates, it appears perverse to rule this out.

6. Other Points

- 6.1 Denbighshire's choice of collection system in 2009 appears to have been justified by the Council consistently being the highest recycling LA in Wales.
- 6.2 In response to criticism of their stance on mixed recycling collections a few years ago, WG officials stated that, theoretically, kerbside sorted systems can capture as much of the available material as mixed recycling schemes. Whilst there is no arguing the logic of this theory, several years on there is still no evidence of Welsh LAs using kerbside sort systems to capture recyclate at the levels of the better mixed recycling schemes.
- 6.3 Despite Denbighshire using a mixed recycling approach, the vast majority of materials collected are sent for "high quality recycling" as defined by WG. Since it opened in 2011, Denbighshire has sent all its mixed recycling to the MRF operated by UPM-Kymmene in Flintshire, where the newsprint is used in UPM's own papermill.
- 6.4 It is a fallacy that all mixed recycling is necessarily of low quality and is exported. Being a paper manufacturer themselves, quality of materials is critical to UPM and all the recovered paper and board go into new paper products, over 90% of glass goes for re-melt, aluminium is all sent to Novelis in Warrington, steel to Tata Steel in South Wales and plastics are sorted by polymer and colour and largely enter closed loop recycling at a number of reprocessors, many in the UK.
- 6.5 The knock-on effect of the extremely effective dry recycling collection is that food waste capture rates in Denbighshire are also the best in Wales. It has to be said though, that food waste capture levels are still not high enough.
- 6.6 Denbighshire's households produce less residual waste than any others in Wales. This means less waste goes to landfill and less Landfill Tax being paid to HMRC and Denbighshire enjoys a high margin of safety from WG's Landfill Allowance Scheme fines.
- 6.7 It is a fallacy that mixed recycling collections are more expensive than kerbside sort. WLGA benchmarking information show Denbighshire 8th out of 22 LAs in for dry recycling service costs in 2012/13, which is very good for a largely rural LA achieving high performance levels.