



Department
for Environment
Food & Rural Affairs

Consultation on consistency in household and business recycling collections in England

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Executive summary

Policy rationale and summary of proposals

The government supports frequent and comprehensive rubbish and recycling collections. Since 2010 government has supported the delivery of these services and making it easier for householders to recycle. This includes £260 million of support for weekly waste collections including regular food waste collections; recycling reward schemes and other measures to promote recycling.

Since 2001 we have seen household recycling rates in England increase considerably from 11% to 45.2% in 2017¹. However, despite measures by government and local authorities in recent years, rates have remained at around 44/45%². While many local authorities continue to make improvements and have introduced new services, some have seen a drop in recycling rates or have stopped services such as food waste collection or do not collect the full range of recyclable materials. In addition, apart from Landfill Tax, which incentivised diversion from landfill disposal and has helped to increase recycling rates since it was introduced, there are very few current drivers to encourage local authorities to improve the way they recycle or for businesses to invest in recycling services. This makes it harder to improve the quantity and quality of what we recycle and frustrates householders who want to recycle more but who are increasingly confused over what can and cannot be recycled in their area.

Members of the public, industry and other stakeholders have called for greater consistency in the materials collected for recycling as well as, to some extent, how it is collected. In 2015 government took steps to decriminalise householders for minor mistakes in recycling so that action could be focused on offences that have a significant impact on local amenity. However, complex rules about what can and cannot be recycled still confuse householders and unintentionally lead to mistakes in what is recycled. We want to tackle this confusion and make recycling easier for everyone. There have also been calls for investment in separate food waste collection to reduce the amount of food waste going to landfill, where it releases harmful greenhouse gases. This includes recommendations from the House of Commons Environmental Audit Committee and the National Infrastructure Commission. Many householders also want to see regular and reliable waste collections to help them recycle more easily.

This consultation is concerned with measures to improve the quantity and quality of what we recycle both at home and at work in England. We believe these measures will help to transform recycling in England and to increase recycling rates significantly above 50% towards the much higher recycling rates of 65% that we have set as ambitions in the Resources and Waste Strategy. Proposals which follow from this consultation will take account of the future relationship we will negotiate with EU on environmental matters.

Government recognises the pressures on local authorities. They will therefore receive additional resource to meet any new net costs arising from the policies set out in this consultation when implemented. This includes both net up front transition costs and net ongoing operational costs. A summary of the measures we are consulting to increase household recycling is provided below.

¹ [UK Statistics on Waste](#)

² [UK Statistics on Waste](#)

Summary of proposals to improve recycling from households in England

We are consulting on proposals for all waste collection authorities to:

- collect the same core set of dry recyclable materials from households
- have separate weekly food waste collections from households

Other measures we're consulting on:

- whether waste collection authorities should provide a free garden waste collection service for households with gardens
- how to achieve greater separation of dry materials in collections, especially paper and glass to improve the quality of dry recyclables collected from households
- whether statutory guidance on minimum service standards for waste and recycling services should be introduced
- how to develop non-binding performance indicators to support local authorities to deliver high quality and quantity in recycling and waste management
- how to support joint working between local authorities on waste; alternatives to weight-based targets; and having standardised bin colours for waste and recycling

We want to support local authorities to deliver higher levels of recycling and to improve the quality of what is recycled. To support these ambitions we propose to work with local government to develop non-binding performance indicators for recycling and waste management. We recognise also that the current weight-based recycling targets can favour the collection and recycling of heavy materials such as garden waste over other more environmentally-beneficial measures to promote dry recycling, for example. We are, therefore, also seeking views on supplements to weight-based targets and metrics and whether these could provide a more balanced set of indicators for recycling performance.

We also want to improve recycling from businesses, public bodies and other organisations.

Summary of proposals to improve recycling from businesses and other organisations that produce municipal waste.

We are consulting on proposals for:

- all affected businesses and organisations to segregate dry recyclable materials from residual waste so that these can be collected for recycling
- all affected businesses and organisations to separate their food waste to be collected and recycled or composted
- measures to reduce costs of waste collection for businesses and organisations
- measures to improve the availability of data and information on business waste and recycling

We estimate that about 2 million businesses and other organisations produce municipal waste (i.e. they generate waste which is similar in nature to household waste). The majority of these will be small and micro firms and we recognise that there is potential for additional cost burdens for businesses of this size. We want to avoid or minimise these costs, wherever practicable, and are seeking views on how best this can be done. This may include exempting some firms or organisations from requirements or extending the period of time for these firms to comply.

We are seeking views on whether the proposed changes above should be supported by statutory guidance on household rubbish and recycling collections and on business recycling so that waste collectors are clear on what is expected in terms of local arrangements and can best plan their services. This guidance will be developed with local authorities and industry and subject to further consultation later this year or early 2020.

Subject to consultation this guidance will set out minimum expectations on frequency of waste collections and on measures to improve quality of recycling.

These changes are linked with reforms to producer responsibility for packaging (EPR), which are being consulted upon separately and are also linked to a consultation on the introduction of a Deposit Return Scheme (DRS) for drinks containers in England and Wales.

Summary of conclusions

The changes we propose will help us to meet our commitments in the Resources and Waste Strategy and the 25 Year Environment Plan to accelerate consistency in the materials collected for recycling; to stop food waste going to landfill and to make it easier for householders to recycle. They will also help to significantly increase the amount of material collected for recycling from businesses and improve the quality of recycling collected so it achieves better value on materials markets.

Some of the targets government has committed to achieving in the Resources and Waste Strategy and elsewhere include to:

- work towards zero food waste to landfill by 2030
- recycle 65% of municipal waste³ by 2035
- work towards zero avoidable waste by 2050

This consultation document is supported by an impact assessment. That document estimates that the total Net Present Value (NPV) of measures proposed is estimated at £1,341 million from 2023-2035 (societal savings of -£103 million per year) and should deliver significant greenhouse gases emissions savings of -12.9 million tonnes of carbon dioxide equivalent (MtCO₂e) traded emissions and -13.8 MtCO₂e non-traded emissions between 2023 and 2035.

We expect these proposals to contribute an additional 12% points to our current household recycling rate (by weight), taking it from c. 44% to 56% and as much as an additional 39% points to the recycling rate achieved by businesses (from best estimate of 35% to 74%). Overall, following implementation of the proposed consistent collections and recycling measures, the municipal waste recycling rate would increase from 40% to 64% by 2035. With the EPR packaging reform and DRS impacts included, we estimate a municipal recycling rate above 65% by 2035.

Waste and resource management is a devolved matter and this consultation concerns England only. Subject to the outcome of this consultation there will be a further consultation in late 2019 or early 2020 on regulatory changes to implement these measures and on potential supporting guidance.

³ Municipal waste is a combination of household waste and household-like waste, (e.g. paper, packaging and food waste) produced by businesses – it does not include construction and demolition waste, industrial waste or other wastes that are not similar in nature to household waste. See page 8 for full definition.

Introduction

The government supports comprehensive and frequent rubbish and recycling collections. We have seen household recycling rates in England increase significantly from 11% in 2001 to 45.2% in 2017⁴. However, in recent years, progress has been slower and rates have remained at around 44/45%⁵. While many local authorities continue to make improvements and have introduced new services some have seen a drop in recycling rates and do not collect the full range of materials that can be recycled or do not collect food waste separately. Householders who want to recycle more are increasingly confused over what can and cannot be recycled in their area. Public awareness of plastics as an environmental concern has risen in recent years, with greater focus on recycling and waste management adding pressure to tackle plastic waste – now regarded as one of the world’s most urgent environmental problems.

Apart from Landfill Tax, which has incentivised diversion from landfill disposal and historically helped to increase recycling rates, there are very few current drivers to encourage local authorities to expand recycling services or for businesses to invest in recycling services. This makes it harder to improve the quantity and quality of what we recycle.

China’s ban in 2018 on the import of post-consumer contaminated plastic and paper⁶ has also added to the need to improve the quality of what is collected for recycling and to reduce contamination. Contamination arises from people putting items in their recycling bin that are not collected locally for recycling (i.e. non-target materials); or materials which are not collected as part of dry recycling such as nappies or food waste, or from cross contamination, for example from shards of glass. Improving the quality of material collected would help to increase demand for these materials in the UK and help to ensure that they meet higher quality standards for export.

Members of the public, industry and other stakeholders have called for greater consistency in the materials collected for recycling as well as, to some extent, how it is collected. There have also been calls for investment in separate food waste collection to reduce the amount of food waste going to landfill, where it releases harmful greenhouse gases. This includes recommendations from the House of Commons Environmental Audit Committee and the National Infrastructure Commission.

Purpose of consultation

This consultation is concerned with having consistent collections and recycling to improve the quantity and quality of municipal waste recycled in England. Municipal waste includes what is collected from households and also from businesses, public bodies (such as schools, universities, hospitals and local and national government buildings) and other bodies such as charities or not for profit organisations where they produce municipal waste.

⁴ <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results>

⁵ [UK Statistics on Waste](#)

⁶ <https://www.parliament.uk/business/committees/committees-a-z/commons-select/environmental-audit-committee/news-parliament-2017/chinese-waste-import-ban-evidence-17-19/>

What is meant by consistency in recycling?

In this consultation document consistency refers to the range of measures being proposed by the Government to improve the quantity and quality of recycling in England. This includes measures such as requiring all local authorities and eligible organisations to collect the same core set of dry recyclable materials, to provide separate food waste collections and to follow guidance on minimum service standards.

Consistency will mean that all householders in England can recycle a common set of dry materials (commonly referred to as dry recyclable materials) and food waste. We believe that all local authorities should collect these dry recyclable materials, which would include plastic bottles and plastic pots tubs and trays, glass packaging (bottles and jars), paper and card, and metal packaging. It could also include food and drink cartons. At present, some of these types of dry recyclable materials are not collected consistently across local authorities in England.

We would expect local authorities to collect dry materials separately where this helps to increase quality but the final decision on containers or bins used would be determined by local circumstances. Normally dry materials would be collected in one of following ways:

- all dry materials are collected separately; this is commonly referred to as multi-stream
- paper being collected separately from other dry materials; this is commonly referred to as two-stream or twin-stream
- all dry materials are collected together; this is commonly referred to as comingled

Food waste would be collected separately from other waste in each case.

This means that all householders would recycle the same materials but how they would do this would be determined at a local level, taking into account what is needed to achieve good quality and what is technically, economically and environmentally practicable.

What is municipal waste?

For the purposes of this consultation, municipal waste means:

a) mixed waste and separately collected waste from households, including paper and cardboard, glass, metals, plastics, biowaste, wood, textiles, packaging, waste electrical and electronic equipment, waste batteries and accumulators, and bulky waste, including mattresses and furniture;

(b) mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households;

Municipal waste does not include waste from production, agriculture, forestry, fishing, septic tanks and sewage network and treatment, including sewage sludge, end-of-life vehicles or construction and demolition waste.

This definition is without prejudice to the allocation of responsibilities for waste management between public and private actors.

'Biowaste' means biodegradable garden and park waste, food and kitchen waste from households, offices, restaurants, wholesale, canteens, caterers and retail premises, and comparable waste from food processing plants.

DIRECTIVE (EU) 2018/851 amending Directive 2008/98/EC on waste

For households: We know that householders care very much about recycling but are confused about what can be recycled. Complex rules about what can be placed in each bin add to householders' confusion. To reduce this confusion we want,

- every local authority in England to collect the same range of dry recyclable materials from households in their area. We think this should include: plastic bottles and plastic pots tubs and trays, glass packaging (bottles and jars), paper and card, and metal packaging. It could also include food and drink cartons. We are seeking views on how best to achieve these changes and what materials to include.
- every local authority to provide a scheduled weekly separate collection of household food waste and we want views on whether households with gardens should have access to a free garden waste collection at least once a fortnight.
- views on whether statutory guidance to local authorities on minimum service standards for waste management would help to support local authorities to deliver these changes. These services should be supported by regular and frequent residual waste collections and we seek views on whether the guidance should include advice on minimum frequency for this service. The guidance will be developed with local authorities taking account of comments in this consultation.

In addition to the changes above we think these ambitions could be supported by non-binding performance indicators to help local authorities to deliver high quantities of good quality recycling. We would want to work with the local authority sector to develop these indicators and are therefore consulting on what the indicators might look like and whether this approach would assist local authorities in England to help deliver recycling ambitions.

We also recognise that the current weight-based recycling targets favour the collection and recycling of heavy materials, for example garden waste, over other more environmentally-beneficial measures to promote dry recycling, for example. Also, reforms to producer responsibility may drive further changes in product design and make weight-based metrics less effective at driving environmentally-sustainable behaviours. We are therefore seeking views on how best to apply supplementary targets to weight-based targets and metrics.

A summary of the measures we are consulting on for household recycling and local authority-led services has been provided below.

Summary of proposals to improve recycling from households in England.

We are consulting on proposals for all waste collection authorities to:

- collect the same core set of dry recyclable materials from households
- have separate weekly food waste collections from households

Other measures we're consulting on:

- whether waste collection authorities should provide a free garden waste collection service for households with gardens
- how to achieve greater separation of dry materials in collections, especially paper and glass to improve the quality of dry recyclables collected from households
- whether statutory guidance on minimum service standards for waste and recycling services should be introduced
- how to develop non-binding performance indicators to support local authorities to deliver high quality and quantity in recycling and waste management
- how to support joint working between local authorities on waste; alternatives to weight-based targets; and having standardised bin colours for waste and recycling

Government recognises the pressures on local authorities. They will therefore receive additional resource to meet any new net costs arising from the policies set out in this consultation when implemented. This includes both net up front transition costs and net ongoing operational costs.

For businesses and other organisations: we are consulting on requirements for eligible duty holders in this sector (i.e. those businesses and other organisations that produce municipal waste) to separate their dry recyclables from residual waste so that these materials (e.g. plastic packaging, paper, card, metal and glass) can be collected for recycling, similarly to households. We are also consulting on whether eligible businesses and other organisations in this sector, especially those that produce food waste in significant quantities, should present this separately for recycling.

We estimate that between 30-40% of municipal waste produced by businesses and other organisations, which is similar in nature to household waste, is currently recycled. Given that the waste composition profiles of these sectors suggest high proportions of recyclable products, this performance could rise to 74% with the right measures. This represents a huge opportunity to increase recycling in this sector and a significant step towards a more circular economy⁷.

We estimate that about 2 million businesses and other organisations produce municipal waste (i.e. they generate waste which is similar in nature to household waste). The majority of these will be small and micro firms, and we recognise that there is potential for additional cost burdens for businesses of this size. We want to avoid or minimise these costs, wherever practicable, and are seeking views on how best this can be done. This may include exempting some firms or organisations from requirements or extending the period of time for these firms to comply.

Summary of proposals to improve recycling from businesses and other organisations that produce municipal waste

We are consulting on proposals for:

- all affected businesses and organisations to segregate dry recyclable materials from residual waste so that these can be collected for recycling
- all affected businesses and organisations to separate their food waste to be collected and recycled or composted
- measures to reduce costs of waste collection for businesses and organisations
- measures to improve the availability of data and information on business waste and recycling

The changes we propose will help us to meet our commitments in the Resources and Waste Strategy and the 25 Year Environment Plan to accelerate consistency in the materials collected for recycling; to work towards no food waste going to landfill and to make it easier for householders to recycle. They will also help to significantly increase the amount of material collected for recycling from businesses and other organisations and improve the quality of recycling collected so it achieves better value on materials markets. These measures will ensure the government maintains its ambition to become a world leader in resource efficiency, resource productivity and increasing competitiveness.

⁷ See the 'Consistent municipal recycling collections in England' Impact Assessment.

Some of the commitments that the government has made in the Resources and Waste Strategy and elsewhere include to:

- work towards zero food waste to landfill by 2030
- recycle 65% of municipal waste by 2035
- work towards zero avoidable waste by 2050

Subject to the outcomes of this consultation, we will seek to legislate to introduce the measures outlined in this document and will also publish statutory guidance on household and business waste management so that waste collectors are clear on what is expected in terms of recycling arrangements and can best plan their services.

These changes are linked with proposals for extended producer responsibility (EPR) for packaging ('packaging EPR'), which are being consulted upon separately and are also linked to a consultation on the introduction of a Deposit Return Scheme (DRS) for drinks containers in England and Wales.

As waste and resource management is a devolved matter, this consultation concerns England only.

Timeline

Subject to the outcome of this consultation there will be a further consultation in late 2019 or early 2020 on regulatory changes to implement these measures and supporting guidance.

Cost and benefits of implementing changes proposed in this consultation

This consultation is supported by an impact assessment (IA), which sets out the potential costs of investment in extending recycling collections and adding food and garden waste collections. This IA outlines 3 different options for both local authorities and the wider municipal sector (businesses and public organisations).

For households, these scenarios propose different arrangements for the collection of dry materials and are all based on the separate collection of food waste and a free fortnightly garden waste collection for houses with gardens. Under multi-stream dry recycling collections, local authorities' waste management costs would be lower by -£967 million over the period 2023-2035, or £679 million when discounted. This is the net result of:

- the initial transition costs (£622 million), which include capital costs for buying new waste containers and ongoing annualised capital investment costs in new vehicles and wider transition costs⁸
- -£3,031 million savings on ongoing costs from reduced waste treatment costs and increased material revenue to LAs
- lost income from the removal of garden waste collection charges (£1,442 million)

With multi stream dry recycling collections and separate food waste and free garden waste collections, the household recycling rate would increase from around 44% (2018) to 55.5% by 2029. Together with measures to increase non-household municipal recycling and

⁸ For each option, these include the costs of project management, re-routing of vehicles, roll out communication costs, depot hire for containers, engagement staff costs, call centre costs and delivery costs of new containers.

measures to reform producer responsibility and potentially a Deposit Return Scheme we would expect to achieve 65% recycling by 2035.

For businesses and other organisations that produce municipal waste, we propose 3 scenarios in our IA for the segregation of dry recyclable waste and food waste. We estimate that the policy of separate dry recycling, separate glass and separate food waste would generate discounted savings of £1,206 million from 2023-2035. This is the result of a phased-in implementation approach, starting first with business sectors where changes can be implemented most cost effectively. Large, medium and small⁹ businesses see annual (undiscounted) savings of approximately £58 million, £98 million and £116 million respectively. By 2035, we estimate that micro businesses, the largest in number, would see a total cost increase of £292 million per year. The impact assessment assumes that micro businesses would start implementing changes from 2031 onwards. We also costed sectoral support (£278 million) that would cover aspects such as national recycling communications, sharing of best practice and development of further cost reduction options to small and micro businesses.

We are looking at the extent to which financial contributions from producers, under packaging EPR, can help reduce the impact of new cost burdens to businesses. We are also seeking views, via this consultation, on other measures to reduce this impact and costs for small and micro businesses especially.

Whilst these costs may be significant, there are also substantial social and environmental benefits to be obtained through these proposed changes. Detailed information on cost benefit analyses can be found in the IA, provided separately. The benefits include avoided carbon emissions, reduced waste to landfill and substantially higher levels of recycling.

We expect the measures set out in this consultation could help to:

- increase the quantity and quality of household and business recycling
- make recycling easier for householders, helping them to put waste materials into the correct recycling bins
- significantly reduce the cost of household collections and the charges that businesses would pay for enhanced recycling services
- ensure there is a reliable supply of quality material for secondary materials markets
- support comprehensive rubbish and recycling collections through establishing minimum service standards
- give confidence to producers that an increased amount of recyclable material will be collected and returned to secondary materials markets to be reprocessed - this will support proposals under packaging EPR and a DRS for drinks containers
- improve investor confidence and help increase UK-based recycling capacity and minimise dependence on overseas export markets for recycling
- ensure an increased amount of separately-collected food waste and garden waste can be recycled through anaerobic digestion and composting, respectively
- improve estimates of the demands for future recycling and residual waste treatment infrastructure
- ensure only what is necessary is sent for energy recovery or to landfill. This will help to reduce greenhouse gas emissions from residual waste disposal and be beneficial for the environment

⁹ Small and medium enterprises are generally defined as those having between 0 and 249 employees. The Bank of England and the British Bankers Association (BBA) define SMEs as those businesses with less than £25 million annual turnover on the main business account.

Under Option 3 in the impact assessment, the total Net Present Value (NPV) of these measures is estimated at £1,341 million from 2023-2035 (societal savings of -£103 million per year) and should deliver significant greenhouse gases emissions savings of -12.9 million tonnes of carbon dioxide equivalent (MtCO_{2e}) traded emissions and -13.8 MtCO_{2e} non-traded emissions between 2023 and 2035.

We expect these proposals to contribute an additional 12% points to our current household recycling rate (by weight) taking it from c. 44% to 56% and as much as an additional 39% points to the recycling rate achieved by businesses (from best estimate of 35% to 74%). Overall, following implementation of the proposed consistent collections and recycling measures, the municipal waste recycling rate would increase from 40% to 64% by 2035. With the EPR packaging reform and DRS impacts included, we estimate a municipal recycling rate above 65% by 2035.

Consultations on producer responsibility and deposit return schemes

Alongside this consultation, (which applies to England only), there are other consultations taking place in parallel as follows:

- **The UK government** with Devolved Administrations is consulting on reforms to the Producer Responsibility (Packaging Waste) Regulations. This consultation sets out the packaging EPR proposals. This consultation can be found using the link below:
Reforming the Packaging Producer Responsibility System: <https://consult.defra.gov.uk/environmental-quality/consultation-on-reforming-the-uk-packaging-produce>
- **The UK and Welsh Governments** and the **Department of Agriculture, Environment and Rural Affairs, Northern Ireland** are consulting jointly on whether to implement a deposit return scheme (DRS) for drinks containers
Introducing a DRS: <https://consult.defra.gov.uk/environment/introducing-a-deposit-return-scheme>
- **Plastic packaging tax** in which HM Treasury is seeking views on the design of a brand new tax on the production and import of plastic packaging that doesn't include at least 30% recycled content. This was announced at Budget 2018, and will be implemented in April 2022
Plastics Packaging tax: <https://consult.defra.gov.uk/environmental-quality/plastic-packaging-tax>

The packaging EPR consultation sets out proposals to reform producers' responsibilities so that producers bear the net costs of collecting and disposing (or recycling) of packaging that they place on the market. It is intended that money raised through the reformed packaging EPR system will support some of the changes proposed here including collections, recycling infrastructure and services that deliver overall system savings and better recycling rates. The exact model for the proposed packaging EPR is subject to consultation. The consultation on the introduction of a DRS seeks views on proposals for schemes to incentivise consumers to recycle beverage containers and reduce littering.

We expect the Packaging Producer Responsibility reforms to provide full net cost recovery for collection of materials. The extent of this will depend on the EPR models under consideration, the design of collection systems and the composition and design of packaging in the future. Funding levels will also depend on how the governance

arrangements for the adopted packaging EPR model are set up. **We want to ensure that, local authorities are able to make the necessary investments in infrastructure, such as waste collection vehicles, bins and sorting/treatment facilities, to support these changes and will work with them to ensure any new costs are fully covered.**

Budget 2018 announced the introduction of a world leading new tax on the production and import of plastic packaging from April 2022. Subject to consultation, this tax will apply to all plastic packaging which does not contain at least 30% recycled content. The tax will provide a clear economic incentive for businesses to use recycled material in the production of plastic packaging, which in turn will create greater demand for this material. To ensure a coherent approach, the government will consult on this alongside the consultation on Producer Responsibility (Packaging Waste) Regulations.

As these policy initiatives are linked, we have chosen to consult at the same time and give respondents the opportunity to consider these proposed changes in the round. The packaging EPR reforms and a potential DRS would need to work alongside each other and the recycling collection arrangements in operation in each UK devolved administration.

We recommend that you refer to these linked consultations, as you consider your responses to this consultation. We also encourage you to respond to these other consultations.

Stakeholder engagement

We have engaged with key stakeholders during summer 2018 to discuss these issues and obtain valuable insights about the priorities, challenges and opportunities related to local authorities and the waste and recycling industry. This is because we want any proposed measures to be evidence-based, deliverable and beneficial to resource management. Bodies engaged include NAWDO (the National Association of Waste Disposal Officers), LARAC (Local Authority Recycling Advisory Committee), ADEPT (Association of Directors of Environment, Economy, Planning and Transport), LGA (Local Government Association), and LEDNET (London Environment Directors Network). We have also engaged with industry bodies such as the ESA (Environmental Services Association), ADBA (Anaerobic Digestion and Bioresources Association), REA (Renewable Energy Association), BPF (British Plastics Federation), and British Glass, as well as a number of waste operators.

Audience

We welcome views from all relevant stakeholders including local authorities and other waste collectors, representatives from the waste and recycling industry trade bodies, businesses, NGOs, third sector organisations, householders and others.

Responding to this consultation

Please respond to this consultation in one of the following ways:

Online using the citizen space consultation hub at Defra:

<https://consult.defra.gov.uk/environmental-quality/consultation-on-consistency-in-household-and-busin>

By email to: recycling@defra.gsi.gov.uk

Or in writing to:

Consistency in Recycling Consultation
Municipal Waste Collection and Recycling Team
Department for Environment, Food and Rural Affairs,
Ground Floor, Seacole Block,
2 Marsham Street,
London, SW1P 4DF

Duration

This consultation will run for 12 weeks. This is in line with the Cabinet Office's 'Consultation Principles', which advises government departments to adopt proportionate consultation procedures. The consultation opens 18 February 2019. The consultation closes 13 May 2019.

Handling of comments after consultation

A summary of the responses to this consultation will be published and placed on the government websites at www.gov.uk/defra.

The summary will include a list of names and organisations that responded but not personal names, addresses or other contact details. However, information provided in response to this consultation document, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes, such as the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018.

If you want information, including personal data that you provide to be treated as confidential, please say so clearly in writing when you send your response to the consultation and explain why you need these details to be kept confidential. If we receive a request for disclosure under the FOIA, we will take full account of your explanation, but due to the law we cannot provide any assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

Defra is the data controller in respect of any personal data that you provide, and Defra's Personal Information Charter, which gives details of your rights in respect of the handling of your personal data, can be found at:

<https://www.gov.uk/government/organisations/department-for-environment-food-rural-affairs/about/personal-information-charter>.

Compliance with the consultation principles

This consultation is being conducted in line with the Consultation Principles set out in the Better Regulation Executive guidance, which can be found at:

<https://www.gov.uk/government/publications/consultation-principles-guidance>.

If you have any comments or complaints about the consultation process, please address them to:

By e-mail: consultation.coordinator@defra.gsi.gov.uk

Or in writing to:

Consultation Co-ordinator, Defra,
8A, 8th Floor, Nobel House,
17 Smith Square,
London SW1P 3JR

About you

1. What is your name?

2. What is your email address?

This is optional, but if you enter your email address then you will be able to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.

3. Which best describes you?

Please tick only one option. If multiple categories apply to you please choose the one which **best describes you** and which you are representing in your response. (Required)

- Local Authority
- Waste management company
- Business representative organisation/trade body
- Product designer
- Manufacturer
- Distributor
- Retailer
- Reprocessor
- Community group
- Charity or social enterprise
- Independent consultancy
- Academic or researcher
- Individual
- Other (please provide details ...)

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

5. Would you like your response to be confidential?

Yes / No

If you answered 'Yes' above, please give your reason:

Part 1 Measures to improve the quantity and quality of household recycling collected by local authorities

Background

The growth in the recycling rate in England has slowed significantly in the past 5 years.¹⁰ There are a number of reasons for this trend. In particular, local authorities and other stakeholders have highlighted the absence of drivers for expanding services to collect more materials for recycling as being one of the factors contributing to stalled recycling rates¹¹. This is because the costs of collecting a broader range of materials is disproportionately more expensive for local authorities and the incentive for doing so from reducing residual costs or gaining revenue from recyclates is not sufficient to justify upfront investment.

Members of the public are often confused about what their local authority collects for recycling and by sometimes complex bin rules and inconsistencies between local authorities in what they recycle and what can be placed in each bin. WRAP's 2018 Recycling Tracker Survey¹² shows that over three quarters of UK households (76%) add one or more items to their recycling collection that is not accepted locally. More than half (54%) put at least one recyclable item in the general rubbish bin.¹³

As a result, some householders either don't recycle all they can, or they might inadvertently contaminate recycling bins with items that are not collected locally for recycling or that cannot be recycled, (e.g. soiled packaging or nappies). Such contamination can reduce the quality and value of materials recycled and might even lead to whole loads being rejected at reprocessing or sorting centres. Contamination can also reduce demand for secondary materials as producers lose confidence in the flow and quality of recycled materials and turn to primary raw materials instead. Stakeholders have also stated that the need to improve the quality of recyclate and demand for secondary materials are important preconditions for increasing recycling and to encourage producers and packagers to use more recycled materials.

Government has set ambitious commitments for recycling in the Resources and Waste Strategy, including to achieve a 65% recycling rate by 2035 and to work towards sending no food waste to landfill by 2030. To do this, we need comprehensive waste management and recycling services, where all local authorities collect the same range of dry materials from households and collect food waste separately. The proposals in this consultation document for greater consistency in collections will expand the range of material collected for recycling and this should help to minimise public confusion over what can be recycled. Separate food

¹⁰ In 2012 the household waste recycling rate was 44.1%; in 2016 (the most recent data available) it was 44.6%. Source: Defra, GSS (2018) [UK Statistics on Waste NOTE we have just published latest England figures for 2017 waste from households recycling](#)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763191/LA_CW_mgt_annual_stats_notice_dec_2018.pdf

¹¹ <http://www.wrap.org.uk/sites/files/wrap/Local%20Authority%20Survey%20Report%20240316.pdf>

¹²

<http://www.wrap.org.uk/sites/files/wrap/Recycling%20Tracker%20Report%202018%20-%20Final%20for%20publication.pdf>

¹³ WRAP (2018) [Recycling Tracking Survey 2018: Behaviours, attitudes and awareness around recycling](#)

waste collection will also help boost recycling rates and reduce contamination of dry recycling. These outcomes are vital if England is to reach its ambitious targets to recycle more and to achieve zero avoidable waste by 2050.

Current legislation and collection arrangements

The types of waste collected by local authorities in England and how collections are undertaken are mainly shaped by 3 pieces of legislation: the Environmental Protection Act 1990 (EPA 1990), the Waste (England and Wales) Regulations 2011 (as amended 2012), and the Controlled Waste (England and Wales) Regulations 2012 (CWR).

EPA 1990 (section 45A) requires local authorities to collect at least 2 types of recyclable waste, together or individually separated from the rest of the household waste, unless the waste collection authority is satisfied that the cost of doing so would be unreasonably high or comparative alternative arrangements are available.

EPA 1990 defines household waste, commercial waste and industrial waste. The CWR 2012 makes further provision as to which materials are household waste, commercial waste or industrial waste, and what household waste streams can attract a charge from local authorities for their collection and/or disposal. With certain exceptions including garden waste, local authorities are not allowed to charge for the collection of household waste. Outside of these requirements, local authorities can decide what waste they collect for recycling, and how they collect it – for example, the number of bins and the frequency of collections.

The Waste (England and Wales) Regulations 2011 also require waste operators to separately collect waste paper, metal, plastic and glass to be recycled. This measure is intended to reduce contamination of recycling and drive higher quality so that collected materials can attract a higher value on secondary markets. The law states that separate collection is required except where this is not necessary to ensure waste undergoes recovery operations and to facilitate or improve recovery or where it is not technically, environmentally or economically practicable (TEEP) to do so. In some cases, it may not be practicable to separately collect materials or it may not be necessary to do so because the quality achieved from mixed collection of recycling is sufficient to meet demand. In these cases waste collectors are allowed to collect materials in a mixed or comingled fashion and these are later separated and sorted at a materials recovery facility (MRF).

Over time, the way local authorities have collected waste and the range of what could be recycled has evolved. This has resulted in a variety of collection practices across different local authorities with different categories of materials being collected, (e.g. some collecting all types of plastics others just plastic bottles). The reasons for this variety of systems are often linked to the cost of collection; the waste treatment infrastructure available in a local area and to contractual arrangements for collection services. Some local authorities have comingled collections and others have separate collection. Also, some authorities state that they are unable to collect some materials such as glass or plastic pots tubs and trays as it would negatively affect quality and/or entail additional investment to modify existing sorting facilities or to modify or change collection vehicles.

Geography and housing stock also play a role in determining how local authorities collect recyclables, (e.g. comingled or separated). For example, distances between housing might be significant or internal and external space for separation of materials in some properties may be constrained.

WRAP¹⁴ and industry framework for greater consistency in recycling

In 2015, government asked WRAP to work with representatives of the waste and recycling industry and local authorities to develop a framework for greater consistency in household waste recycling in England. This framework was published in 2016¹⁵ and it proposed a voluntary approach for all local authorities in England to collect a single set of dry materials and separate food waste using one of 3 agreed methods of collection (i.e. comingled, two-stream or multi-stream). WRAP analysis shows that in 2017/18, 74 local authorities in England provided a comprehensive collection service for dry recyclable materials including plastic pots, tubs and trays, and separate food waste collections. This was slightly higher than the 70 local authorities that provided this in 2016/17 and significantly higher than the 56 local authorities that provided this level of service in 2015/16.

The consistency framework also identified a number of other changes needed to bring about greater consistency in recycling services, in particular that all packaging placed on the market should be sortable and recyclable unless there are strong practical and environmental reasons for it not to be. Additionally, the consistency framework recommended that this packaging should be labelled with meaningful consumer information to indicate whether it can or cannot be recycled. Further information on product packaging labelling reforms can be found in the consultation on packaging EPR.

The reforms proposed by this framework are being taken forward by WRAP and industry bodies. The collections framework forms the basis of proposals in this document to improve recycling for households.

While we believe that local authorities continue to be best placed to deliver household waste collection and recycling services, we think current legislation is outdated and does not promote a more circular economy or provide the right legislative drivers to support higher levels of recycling and higher quality recycling.

Proposals for collecting a core set of dry materials for recycling

In the Resources and Waste Strategy, we have committed to meeting ambitious targets, such as increasing municipal waste recycling rates to 65% by 2035. In order to do that, we need to transform the recycling collected from households in England and to provide a truly comprehensive service for rubbish and recycling. We think the time is right to put in place changes that will ensure the same range of materials is collected for recycling from kerbside for every household in England. **We therefore propose to legislate for all local authorities in England to be required to collect a minimum or core set of 'dry' recyclable materials from kerbside households and flats. This will ensure that every householder is able to recycle a consistent set of materials.** We think it is unlikely that LAs will need to deviate from collecting these materials but would welcome views on circumstances where this might be necessary. **Where new duties are placed on local authorities these will be assessed to account for new burdens, and funded appropriately.**

¹⁴ WRAP is the Waste and Resources Action Programme <http://www.wrap.org.uk/>

¹⁵ http://static.wrap.org.uk/consistency/Read_more_about_the_framework.pdf

We would want these measures to apply to flatted properties. Building regulations Approved Document H6, Para 1.1 – 1.23 sets out requirements for siting and design of waste provision in high and low rise developments and states that adequate bin storage should be provided including for waste which can be recycled.¹⁶ We recognise that there may be circumstances such as high rise flats or flats above commercial premises where additional considerations such as planning or space constraints may apply. We would want to explore the implementation issues for flats and we are seeking views on how best to approach this.

This core set of dry materials should include at least the following:

- glass bottles and containers – including drinks bottles, condiment bottles, jars etc.
- paper and card – including newspaper, cardboard packaging, writing paper etc.
- plastic bottles – including clear drinks containers, HDPE (milk containers etc.)
- detergent, shampoo and cleaning products etc.
- plastic pots tubs and trays
- steel and aluminium tins and cans

The core set of materials above would have to be collected by all local authorities in England, meaning every householder could expect to recycle the same set of materials regardless of where they lived in England. We estimate that 70% of local authorities in England already collect these dry recyclable materials. This means that for many households, their dry recycling collections could remain the same. As stated above we think it is unlikely that LAs will need to deviate from these requirements but would welcome views on circumstances where this might be necessary. The method of collection may be subject to local circumstances and this is covered elsewhere in this consultation. **This means that in following these reforms every householder could expect to recycle the same materials regardless of where they live, but the way in which these materials are collected, (e.g. the bins or other containers used) may vary locally.**

Following legislation we would expect local authorities would transition to consistency at the point of next contract renewal or whenever is the cheapest to do so. We want to ensure sufficient lead time for industry and local authorities to plan and adapt their services, and for existing market barriers to have been addressed. We would expect all local authorities to adopt consistency at the earliest opportunity.

Our proposals for packaging EPR and the introduction of a tax related to levels of recycled content in plastic packaging will ensure producers bear responsibility for the net costs of collecting packaging of this type, encourage design for greater recyclability, and stimulate demand for recyclable plastic. Together, these reforms will help to increase the demand for recyclable packaging, providing greater economic incentive for local authorities to collect all the core recyclable materials. As stated in the Budget 2018, we expect future revenues raised from these measures to enable investment to address single-use plastics, waste and litter to meet the government's ambitions for resources and waste.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/442889/BR_PDF_AD_H_2015.pdf

Improving recycling in flats and Houses in Multiple Occupation (HMOs)

The ONS website records 22% of housing stock in England is made up of flatted properties¹. Local authority areas with a higher ratio of flats and HMOs generally tend to have lower recycling rates compared to those with mainly kerbside properties with recycling yields being typically half those of kerbside properties¹ Increasing recycling in flats is therefore important for increasing recycling overall.

Householders in flats and HMOs also typically have limited access to recycling services and physical restrictions on space for storing recyclable materials, both inside the home and externally, prior to collection. The use of weight-based metrics also mean that rural and suburban areas, which are more likely to have households with larger gardens, benefit from higher garden waste arisings, which can be composted and count towards overall recycling rates.

Government has supported WRAP to roll out a number of pilot projects to increase the recycling performance in flats and urban areas across England¹.

There have also been local initiatives to improve recycling from flats. For example, in 2010, the London Waste and Recycling Board (LWARB) launched a £5 million fund for London boroughs that wanted to increase recycling from flats. This funding was used to support 29 projects across 26 London boroughs helping to:

- Recycle an additional 60,236 tonnes;
- Achieve an average increase in recycling of 28.81 kilograms per household covered by the schemes; and
- Avoid 40,147 tonnes of CO₂e.

Separately, a guide on tackling waste management problems in the domestic rented sector has been launched by Resource London and the London Environment Directors Network (LEDNET). This guide identifies a number of areas in which London boroughs can work more effectively with tenants and landlords to improve resource efficiency¹.

In spite of progress made, recycling from flats and HMOs remains a major challenge for many local authorities and Government will continue to work with relevant stakeholders to improve recycling performance in this area.

Government wants the measures being proposed as part of Consistency to apply to both houses and flats. There may be circumstances such as high rise flats or flats above commercial premises where additional considerations such as planning or space constraints may apply. We welcome views on these issues or other challenges that applying these requirements to flats might present for local authorities especially those with a higher amount of flats and HMOs. We also welcome views on how these challenges may be addressed.

Changes to the core set of materials

The waste streams generated by households contain some items or materials that could be considered 'difficult to recycle' using conventional sorting and reprocessing infrastructure in the UK. These items include a wide range of products including window pane glass, sanitary products and composite packaging. Over time the waste composition from households is expected to change under the influence of packaging EPR and industry initiatives aimed at

achieving greater resource efficiency, e.g. the Plastics Pact¹⁷. As a consequence, the core set of materials specified under Consistency may need to change over time, as manufacturing processes and consumer shopping habits evolve. Therefore, we will maintain flexibility within the law to update the core set of materials to be collected, if required, in the future.

New materials would be added subject to consultation and evidence being provided that they are collected or can reasonably be collected for recycling and can reasonably be recycled. The range of materials would also be determined, to some extent, by the packaging EPR and DRS proposals.

Other materials that could be included either immediately or over time might be:

- food and drinks cartons
- plastic bags and other plastic film
- black plastic food and drink packaging

Some local authorities have expressed concern over the economic viability of collecting all recyclable materials because of a lack of market demand or low prices offered by reprocessors for materials such as plastic pots, tubs and trays. This is a valid concern, but it is expected that consistent collections will help to support more sustainable secondary materials markets and better quality recycling. In addition, reforms to producer responsibility will ensure full net cost recovery overall for packaging materials and so costs of collection should be covered.

Decisions on materials to be included would also be substantially influenced by regulations on producer responsibility and materials covered by a potential DRS. We would welcome views on whether the proposed core set of dry materials identified above is sufficient and whether it could include other materials which might be regarded as more difficult-to-recycle. We also welcome views on circumstances where such a comprehensive service for dry recycling may not be practicable.

Government is also aware of a growing trend of businesses and public bodies switching from using plastics to certified compostable plastic packaging and tableware¹⁸. Compostable plastics are also being used to manufacture packaging of short-life products and container lids.

Where compostable plastics are collected in dry recycling collections they may contaminate the dry recycling process and compromise quality. If collected with food waste they are also unlikely to degrade effectively within an anaerobic digestion (AD) process. In addition, unless AD sites include in-vessel composting steps (IVC), or if the plastic is not fully removed by front-end de-packaging equipment, some of it may end up in the end product digestate and be inadvertently spread to land. Clear labelling and communications would be necessary to help manage these risks. Appropriate treatment infrastructure would also need to be in place before we considered adding compostable plastics to the core list of materials to be collected for recycling. Until this point, it may be necessary for consumers to be advised put this type of packaging in the residual waste bin. We will continue to monitor this area.

¹⁷ http://www.wrap.org.uk/content/the-uk-plastics-pact?qclid=EA1alQobChMI2evwv_qm3wIVGOJ3Ch3swA9yEAAYASAAEgJi4vD_BwE

Consultation questions on dry recycling

Proposal 1

We propose that all local authorities in England should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

Q5 Setting aside the details of *how* it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

- Agree – local authorities **should** be required, to collect a core set of materials
- Disagree – local authorities **should not** be required, to collect a core set of materials
- Not sure/don't have an opinion

Q6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

- Agree
- Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

Q7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

Q8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

Q9 Do you have any other comments to make about Proposal 1? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

Proposal 2

We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

Q10 Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paper and card	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bottles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic pots tubs and trays	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steel and aluminium tins and cans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q11 What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?

	This should be included in the core set from the start of Consistency	This should be included from the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bags and film	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other materials (please specify)				

Q12 If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.

Q13 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

Q14 Do you have any other comments to make about Proposal 2?

Proposal 3

We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that a) evidence supports the benefits, b) there are viable processing technologies for proposed materials, c) there are sustainable end markets, d) local authorities would not be adversely affected, including financially.

Q15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- Yes
- No
- Not sure/don't have an opinion

Q16 Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

- Yes – but I would also add some (please specify which conditions you believe should be added ...)
- No – some/all should be removed (if some please specify below)
- No – some should be added and some should be removed (please specify which ...)
- Not sure/don't have an opinion

Q17 Do you have any other comments to make about Proposal 3?

Proposals for separate food waste collection

Approximately 1.5 million tonnes of household food waste is sent to landfill each year, where it can release methane, a harmful greenhouse gas, into the atmosphere, unless captured for energy generation.¹⁹ If collected separately from other waste materials, food waste can be sent for composting or ideally anaerobic digestion (AD), where it breaks down in a controlled way and the methane is converted into biofuel that can be fed into the national grid, used to generate electricity, or used as a vehicle fuel. The AD process also produces a nutrient-rich fertiliser (called digestate) that farmers can use in place of chemical fertilisers.

Currently, 51% of local authorities in England collect food waste separately from residual waste. Out of this, 35% collect this separately on a weekly basis; 12% collect food waste mixed with garden waste, usually on a fortnightly basis, and the remaining 4% operate both systems.²⁰ Collecting food waste mixed with garden waste fortnightly can lead to lower yields compared to a weekly separate food waste collection. It can also lead to odour and other issues which may discourage householders from using the service²¹. When collected with garden waste, food waste cannot be sent to AD and is sent to in-vessel composting. Unlike AD, in-vessel composting does not produce biofuel for energy generation and is a

¹⁹ <http://www.wrap.org.uk/sites/files/wrap/Food-Surplus-and-Waste-in-the-UK-Key-Facts.pdf>

²⁰ <http://laportal.wrap.org.uk/>

²¹ http://www.wrap.org.uk/sites/files/wrap/Food_Garden_Waste_Report_Final.pdf

comparatively more expensive waste treatment option²². On the other hand, mixed food and garden waste collections can be more convenient as it does not require separate arrangements for collection of food and garden waste.

Separate collection of food waste in England has increased since 2010, but the tonnage collected has been relatively small at 386,000 tonnes in 2017²³. Our analysis shows that if all local authorities provided at least kerbside properties (as opposed to flats) with a separate food waste collection service, this would increase the amount of food waste collected by 1.35 million tonnes by 2029 and reduce GHG emissions by an estimated 1.25 million tonnes a year. This would increase the household recycling rate in England by 5% points.

We therefore propose to require that from 2023, all local authorities offer all households separate weekly food waste collection. Generally food waste should be presented separately from garden waste, so that the food waste can ideally be sent to anaerobic digestion. This would be expected in all circumstances except where it was not technically, environmentally or economically practicable to collect this waste separately from other biowaste. Although there may be some circumstances where a mixed food and garden waste collection is necessary, these should be limited. This might include for lower transport costs arising from using local IVC facilities.

A separate weekly food waste collection would mean that local authorities that have moved to a fortnightly collection without providing this service would have to reinstate a weekly collection for food waste. Where a weekly food waste collection is provided, our analysis assumes that weekly collection of dry recycling will also be provided as well as at least alternate weekly collections of residual waste and garden waste. Changes to residual waste capacity would be a decision for each local authority to make in consultation with residents, taking into account their needs and wishes. Where changes were made it would be important to ensure clear communication on what materials can be put in the recycling bin to promote usage and reduce risks of contamination. It would also be important to ensure that householders that needed more frequent collections or larger bins are able to access these. We do not expect any local authority that currently collects residual waste on a fortnightly basis to have to reduce their capacity of collection or frequency further as a result of these measures and where a weekly or more frequent service is needed then local authorities could consider this.

Our IA estimates an investment in the range of £180 million - £260 million would be needed to roll out separate food waste collection across England²⁴. This would be needed to cover additional bins, vehicles and transportation of food waste to AD sites. These costs include free caddy liners to householders as these help to increase yield and improve cost effectiveness of the service though this increases the cost of delivery, which we will take into account as we refine this policy further²⁵. **Given the additional costs involved in separate food waste collection the government will ensure that local authorities are**

²² http://www.wrap.org.uk/sites/files/wrap/Gate%20Fees%20report%202017_FINAL_clean.pdf

²³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763210/WfH_England_Data_201718.xlsx

²⁴ This represents transition costs under household options 1hh and 2hh, respectively. Our preferred option 3hh would see net savings on separate food waste collections of -£33 million. All costs are over 7 years transition period from 2023-2029. See the impact assessment, Annex C.

²⁵ <http://www.wrap.org.uk/content/food-waste-collections-guide-chapter-4-food-waste-caddies-and-caddy-liners>

resourced to meet new costs arising from this policy including upfront transition costs and ongoing operational costs.

Technologies like in-vessel composting (IVC) and mechanical biological treatment (MBT) require mixed organic feedstocks with some amount of food waste to work optimally, and it is possible that separate collection of food waste may compromise the viability of these technologies. Separately collected food waste could be mixed, post collection, with garden waste and be composted using IVC technology. However, we would not want separately collected food waste to be remixed with residual waste to be treated using an MBT as the output material would not be able to achieve end of waste status and be considered recycled.

Where practicable, we would expect authorities that normally use IVC treatment for mixed food and garden waste to allow householders to present food waste separately and then to have this mixed with garden waste at kerbside, transfer station or treatment facility to meet long term contractual commitments to in-vessel composting facilities. Although this might seem counter-intuitive, it would enable the authority to benefit from the higher yields that we would expect to arise from separate presentation of food waste. We would be interested in views on this approach. We would also be interested in views on whether separate collection of food waste would have a significant negative effect on local authorities that are reliant on the use of MBT technology for treatment of residual waste.

Consultation questions on separate food waste collection

Proposal 4

By 2023 we propose to legislate for local authorities to provide all kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners.

Q18 Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) services to be changed only as and when contracts allow	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) providing free caddy liners to householders for food waste collections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

- Yes (if yes please provide further details below)
- No
- Not sure/don't have an opinion

Q20 Do you have any other comments to make about Proposal 4 including on circumstances where it may not be practical to provide a separate food waste collection?

Proposal 5

We will provide funding and support to local authorities to help put in place the necessary collections infrastructure.

Q21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)

- I am not responding on behalf of a local authority
- Specific financial support (please specify)
- Procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers)
- Communications support, (e.g. free collateral that can be adapted and used locally)
- Technical support, (e.g. free advice from a consultant about round re-profiling)
- Other (please specify ...)

Q22 Do you have any other comments to make about Proposal 5?

Proposal 6

We believe it would be desirable for local authorities that have contractual commitments with IVC facilities, which needs mixed garden and food waste, to require separate presentation of food waste but then be able to mix it with garden waste for treatment purposes. This is because our evidence shows that separate presentation of food waste leads to higher yields.

Q23 What are your views on this proposal?

Proposals for collecting garden waste

Garden waste such as grass cuttings or soft foliage from pruning, weeding and vegetable growing etc. represents a significant proportion of waste material by weight. Currently not enough garden waste is recycled; instead it enters the residual waste stream and then sent to landfill where it can generate methane, or it is incinerated. There is significant potential to increase overall recycling rates by targeting this material.

There are 3 main ways to manage garden waste:

1. Encourage households to compost it at home

2. Encourage households to take it to a central site, (e.g. to a Household Waste Recycling Centre (HWRC), either for bulking and onwards transport, or for on-site processing
3. Collect it from the kerbside, ideally separately from food waste, for bulking and onwards transport to a composting facility

Previous governments have funded large scale home composting programmes and home composting continues to be a very effective way to treat food waste when done properly. However, we believe that providing a regular **kerbside collection service** is the best way to increase recycling of garden waste and does not prevent householders from continuing to home compost. Many householders do not have sufficient space to home compost or to use the compost generated. Also, the composting process can fail because when it is not done properly for example, the heap is not turned regularly enough or the mix is wrong. Not all householders can travel to an HWRC or other central site to deposit their garden waste. Therefore, providing a collection service is the most effective way of supporting those that want to recycle garden waste, and ensuring this waste is properly composted and made available for spreading either commercially or domestically to householders.

Charging for garden waste collections is at the discretion of local authorities. Fifty eight percent of local authorities currently charge for this service and therefore there would be financial costs if this measure was introduced. The impact assessment estimates that the transition cost of introducing a free garden waste collection service would be £229 million over 7 years (2023 to 2029). Further, local authorities would lose income from charging of roughly £1.4 billion over 2023 to 2035. Overall, local authorities would see a net cost increase of £550 million between 2023 and 2035 as they make savings on residual waste treatment but face transition and ongoing operating costs and lose income from charging.

However, there are also benefits for garden waste capture and recycling. In 2017/18, 58% of local authorities charged for garden waste collection²⁶. Evidence from WRAP²⁷ shows that where a free garden waste collection service is provided, householders are more likely to participate in this service and therefore more garden waste is composted. Evidence also shows that householder participation and garden waste yields drop off significantly after collection charges are introduced. Households pay around £120 million per year in subscription for a garden waste collection service. Given the dispersal of subscribers across an authority, collection services for charged collections may be more inefficient and represent a higher cost per household serviced than when there is high participation in a free service. This is because vehicles might have further to travel between pickups and collect less material overall. In addition, monitoring of garden waste capture rates across the various disposal and recycling routes suggests that following the introduction of charging, large proportions of garden waste may be entering the residual waste stream.

When a local authority introduces a charge for garden waste collection, there is seemingly no drop in overall waste arisings from more home composting activity or a corresponding flow to HWRCs, suggesting garden waste is diverted to the residual waste bin. Our estimates are that if every householder with a garden had access to a free garden waste collection service then overall household recycling rates would increase by 6% points compared to their current levels, reducing the risk of this material ending up in landfill.

Whilst there are costs from this change we think that the improvements in recycling of garden waste, the greater efficiency of industrial composting and the carbon benefits possibly justify the proposal. **We are therefore seeking views on whether each**

²⁶ <http://laportal.wrap.org.uk/>

²⁷ Unpublished WRAP research. See key results in the impact assessment, Annex F.

household should be supplied with a fortnightly collection service for garden waste and that this service should be free of charge. The size of collection container (either bin or sack) used should be a maximum of 240litres. If households do not have the capacity for another wheelie bin, local authorities could provide alternatives such as sacks strong enough for garden waste. The service should be provided through the growing season. As stated in the Resources and Waste Strategy, we will ensure that local authorities are resourced to meet new net costs arising from this, including upfront transition costs and ongoing operational costs. Further capacity or more frequent collections may be provided but could be charged for by the local authority. Garden waste would not be mixed with residual waste following its collection.

Consultation questions on collecting garden waste

Proposal 7

We are seeking views on whether households generating garden waste should be provided with access to a free collection service. If introduced this this would be a minimum fortnightly collection service of a 240-litre capacity container (either bin or sack). Local authorities may provide additional capacity or more frequent services and would be able to charge for this additional provision

Q24 Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) a free garden waste collection for all households with gardens	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) A capacity to 240l (bin or other container eg sack)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) A fortnightly collection frequency (available at least through the growing season)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(v) this new requirement to start from 2023 (subject to funding and waste contracts)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q25 Do you have any other comments to make about Proposal 7?

Costs and benefits of different collection methods

The IA that accompanies this consultation document proposes 3 scenarios for the collection of dry materials, separate food waste and free garden waste.

- Option 1 assumes that all local authorities will remain on their current collection service profile for dry recycling but would add weekly separate food waste collection and a free fortnightly garden waste collection.
- Option 2 assumes that all local authorities would move to a two-stream collection service for dry material and add weekly separate food waste collection and free fortnightly garden waste collection.
- Option 3 assumes that all local authorities would move to a multi-stream collection service for dry materials and add weekly separate food waste collection and free fortnightly garden waste collection.

Costs for these options are estimated and projected over 13 years in the table below.

Change over 2023-2035 (discounted ²⁸ , against baseline) Costs (+)/savings (-)	Option 1	Option 2	Option 3
	Existing dry recycling system	Two-stream dry recycling	Multi-stream dry recycling
	Separate weekly food		
	Free garden waste		
Household recycling rate (baseline 44%)	55.9%	56.0%	55.5%
Additional LAs net waste management costs/savings from changes in dry recycling, food waste and free garden waste collections for all households	£667 million Comprised of: £373 million transition costs, -£872 million savings on ongoing costs, and £1,166 million lost income from garden waste charging	£1,008 million Comprised of: £858 million transition costs, -£1,016 million savings on ongoing costs, and £1,166 million lost income from garden waste charging	£-679 million Comprised of: £590 million transition costs, -£2,435 million savings on ongoing costs, and £1,166 million lost income from garden waste charging
Savings to households from removed garden waste charging	£1,166 million	£1,166 million	£1,166 million

This analysis suggests that the greatest savings overall are achieved from a multi-stream collection system. This is because for this service a single vehicle can be used to collect

²⁸ Discounting is a technique used to compare costs and benefits occurring over different periods of time on a consistent basis. Discounting of 3.5% per year is applied to all future costs and benefits.

both food waste and separated dry materials on a weekly basis, with garden waste and residual waste collected on a fortnightly basis. Whereas other options rely on an additional vehicle to collect food waste.

For authorities that do not already have multi-stream recycling, moving to this system would require householders to separate their dry recycling before placing it in containers for collection. Whilst the space needed for different collection systems can be similar, it would also mean that households would need to accommodate and use additional containers. Typically, multi-stream collections would have 3 containers for dry recycling compared to 2 for two-stream and one for comingled collections.

In discussions with Waste collectors it has been said that householders prefer to use comingled collection systems. It is argued that this improves participation and provided materials can be effectively sorted following collection, quality does not need to suffer significantly. On the other hand, some local authorities have multi-stream kerbside collection systems and this has not impeded participation. There are also innovations in bin technology such as stackable boxes that can help to reduce the space taken up by containers at kerbside.²⁹ Discussions with reprocessors have highlighted the importance of separating glass and paper, as a minimum.

The two-stream collection approach would offer that alternative in circumstances where multi-stream was not practicable. However, according to the IA, the costs of all authorities moving to two-stream collections are significantly higher than either multi-stream or remaining as now. Therefore, this approach might only be appropriate where a multi-stream system was not practical. In addition, as stated above, there may be other circumstances in which a single system such as multi-stream might be impractical and a twin-stream or comingled service might be more appropriate in order to deliver a good service.

Proposals on improving quality by source separating dry recycling materials

Expanding the breadth of materials collected for recycling will clearly make more secondary material available for reprocessors. Yet just as pressing is the need to improve the quality of recyclate collected for reprocessing. Challenging export markets for dry recyclables have highlighted the need to increase the quality³⁰ of materials collected for recycling from households. In addition, confusion over what can be recycled has been said to be a major cause of contamination; evidence from WRAP's annual Recycling Tracking Surveys³¹ shows that householders are often unsure what they can put in their recycling bin and try to recycle non-target items that are either not recyclable or are heavily soiled.

Proposed measures under packaging EPR will see clearer labelling of products for recycling. Requiring the collection of a core set of materials, as proposed here, alongside clearer communication and labelling about what items can and cannot be recycled should also help reduce contamination. Many stakeholders have argued that higher quality recycling is fundamentally reliant on having separate collection of dry recyclable materials

²⁹ See for example <http://collectionsblueprint.wales/content/system-ailgylichu-trolibocs>

³⁰ By 'increased quality' we mean reduced contamination from non-target and non-recyclable materials.

³¹ http://www.wrap.org.uk/sites/files/wrap/Recycling%20Tracker%20Report%202018%20-%20Final%20for%20publication_0.pdf

that have been segregated by householders, as opposed to mixed or comingled collections. The extent to which glass is separated from other materials is seen as a particular issue that impacts significantly on the quality of recyclate and especially on the quality of paper collected, where fine shards of glass can become embedded in paper and card and lead to significant disruption at later processing stages.

Government has taken a range of actions to support better quality recycling including:

- Regulation 13 of The Waste (England and Wales) Regulations 2011³², which requires an establishment or undertaking that collects waste paper, metal, plastic or glass to take necessary measures to ensure separate collection where this is technically, environmentally or economically practicable (TEEP) and is necessary to improve recovery;
- Publishing a Quality Action Plan for Recycling³³ in 2013, setting out recommendations for improving the quality of materials collected for recycling;
- Writing to relevant local authority bodies and industry bodies to highlight the risks of glass shards contaminating paper in mixed collections and reducing the value of mixed glass overall and to remind operators to give careful consideration to legal obligations when considering comingled collections especially if glass is included;³⁴
- Requiring operators of materials recovery facilities (MRFs) to sample comingled recycling received for sorting and to report on the levels of contamination recorded for both input and output streams and publishing this sampling data quarterly to provide transparency on the performance of MRFs³⁵.

Despite these actions, quality has not improved significantly with many councils following comingled collections and not separating glass from other materials as recommended³⁶.

Comingled collections undoubtedly have some advantages. They yield marginally more recyclate, they eliminate the need for householders and collection crews to sort dry recycling into individual materials streams at the kerbside, and they are less reliant on householders putting only targeted recyclable materials in the recycling bin. They also reduce the number of bins each household needs to accommodate and enable the same type of vehicle to be used on alternate collection rounds to collect residual waste and dry recycling.

However, the available evidence suggests that the disadvantage in terms of the quality of recyclate collected outweighs the advantages. Comingled collections typically contain more contamination, which cannot always be dealt with efficiently by sorting facilities. Higher levels of contamination from non-target materials can increase costs of collection and sorting, and reduce the overall value of secondary materials. The level of rejects from recycling has increased over the last 10 years from 126,000 tonnes in 2006/7 to 467,000

³² <http://www.legislation.gov.uk/ukxi/2011/988/contents/made>

³⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/250013/waste-separate-collection-201310.pdf

³⁵ <https://mfrp.wrap.org.uk/>

³⁶ WRAP LA portal data. Percentages add up to 110 as some local authorities use more than one collection system.

tonnes in 2016/17. Available data for sampling of inputs to MRFs shows that 15.2% of material sent to be sorted was either non-target material or non-recyclable material³⁷.

Multi-stream or two stream collections on the other hand are significantly less contaminated by non-target and non-recyclable materials, as shown by research undertaken by WRAP and Zero Waste Scotland³⁸ and supported by work by the Welsh Government and WRAP Cymru³⁹. This is because materials are sorted into separate streams by the householder before collection and the crew will carry out further sorting at kerbside before loading onto collection vehicles. Non-target and non-recyclable items can be left with the householder at the kerbside, so never enter the recycle stream, keeping it purer from the start.

WRAP undertook research asking respondents to rank a number of service features of a household recycling system. The 3 key service features identified by respondents as being important are having a regular and reliable service, being clear on what can/cannot be recycled and sufficient capacity in the recycling container for all their materials. The aspect of not having to separate waste into multiple containers scored lower in importance⁴⁰.

Separate collection and local decision making

We want to increase the quantity of materials collected for recycling, but we do not wish to do so at the expense of quality. Available evidence indicates that separate multi-stream collection of dry materials with at least paper and glass separated, is the most effective way to ensure high quality recycling. It should be possible to separate at least glass from paper in most circumstances and commingled collections should generally only be considered where separate collection is not technically, environmentally or economically practicable or not appropriate to meet necessary quality standards for relevant recycling sectors. However, we recognise that these conditions can be complex to apply and that separate collection is not always practical because of local circumstance.

We want to help local authorities improve the quality of what is collected for recycling so that its value can also increase. We also want them to make the best decision for local circumstances. We therefore propose to provide statutory guidance to help with decisions making on separate collection and when local authorities should carry out an assessment of the feasibility or otherwise of separately collected recyclable materials.

We will also propose to clarify the requirements of separate collection in law to make these clearer for local authorities and waste operators to follow. Typically separate collection should take place except where:

- Collecting certain types of material together does not affect their potential to undergo reuse, recycling or recovery operations and results in output from those operations which is of comparable quality to that from separate collection;
- separate collection does not deliver the best environmental outcome;
- separate collection is not technically feasible taking into account good practice in waste collection;
- separate collection would entail disproportionate cost, taking into account costs of adverse environmental and health impacts of mixed waste collection and treatment,

³⁷ https://mfrp.wrap.org.uk/downloads/WRAP_MF2018_Q2Commentary_FINAL.pdf

³⁸ <https://www.zerowastescotland.org.uk/sites/default/files/Contamination%20in%20source-separated%20municipal%20and%20business%20recyclate%20in%20the%20UK%20report.pdf>

³⁹ http://static.wrap.org.uk/consistancy/Learn_more_about_the_evidence.pdf

⁴⁰ WRAP (2015) [Recycling Tracker Survey. Sample size: 1,771](#)

as well as potential for efficiencies from separate collection and revenues from secondary material sales and polluter pays principles.

Subject to views from this consultation we will prepare statutory guidance setting out further advice on separate collection and seek to clarify the law as necessary. The statutory guidance would help waste collectors to meet their duties in relation to separate collection and promote high quality recycling. The statutory guidance would also set out the process by which local authorities should use the conditions above to support decisions on local collection arrangements and what information should be recorded in relation to any assessment of separate collection.

Consultation questions on separate collection to improve quality

Proposal 8

In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality. We propose to amend the law to clarify this and will include guidance in our proposed statutory guidance on minimum service standards to help local authorities and waste operators in decision making on separate collection.

Q26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

- Yes
- No (why ...?)
- Not sure/no opinion/not applicable

Q27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.

Q28 Do you have any other comments to make about Proposal 8?

Bin colour standardisation

Different coloured bins are used in different areas in England for collecting various waste material streams from households. This can be confusing for householders because, for example, they may live in an area where green bins are used for residual waste and may have previously lived in an area where green bins were used for garden waste. Many stakeholders have called for a consistent set of colours for waste and recycling bins. As part of the Framework for Greater Consistency in recycling, WRAP has conducted a survey on having a national bin colour scheme, the results indicate that 88% of respondents supported a national bin colour scheme. 91% of respondents said this would simplify communications to households and 83% said it would reduce householder confusion.

Whilst the results of the survey suggest support for a nationally consistent set of bin colours the costs of introduction would be very high if changes were made overnight. WRAP estimates introducing a national bin colour scheme would cost between £290-317 million. However these costs could be significantly reduced if changes were made in a phased way or if stickers or other approaches were used to distinguish different bins. For example, councils could switch to new colours over time when they renew waste management contracts or replace bins. This should help to minimise the cost of change. An alternative approach could be to allow local authorities to standardise the colour of bin lids as an interim measure, until the whole bins need to be replaced. We would be interested in views on the benefits of standardised bin colours in the long term and how these could be introduced at least cost. We will consider this option further following this consultation and will conduct an impact assessment should we decide it is appropriate to take the proposal further.

Consultation questions on bin colour standardisation

Proposal 9

Assuming that we progress with proposals for a core set of materials that must be collected for recycling, the government welcomes views on whether England should move to standardised waste container colours for those materials, together with residual waste, food and garden waste.

Q29 Do you agree or disagree with this proposal?

- Agree – bin colours **should** be standardised for all waste streams
- Agree in part – bin colours should be standardised for some waste streams but not all (specify which ...)
- Disagree – bin colours **should not** be standardised for any waste streams
- Not sure/no opinion/not applicable

Q30 There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?

- Phased approach 1 – as and when waste contracts are renewed
- Phased approach 2 – as and when old/unserviceable bins are replaced
- Other ways please specify...

Q31 Do you have any other comments to make about Proposal 9?

Setting standards for household waste recycling services

Our analysis of available evidence shows that achieving higher waste diversion from landfill and meeting recycling targets will require much more than encouraging the collection of key materials such as dry recyclable materials and food waste. The quality of household waste collection and recycling service provision and communications are also key to achieving high recycling rates. Therefore in order to help achieve high recycling performance and

ensure high quality service provision for households, government is seeking views on proposals to prepare statutory guidance for local authorities on minimum standards in providing household recycling services, including the application of separate collection arrangements or TEEP discussed above. **Any new statutory responsibilities for local government would be subject to an assessment of new burdens and funded as appropriate.**

Any potential statutory guidance on minimum waste services would be aligned to the principles and evidence base within the WRAP Framework for Greater Consistency but would be broader in scope and cover a wider range of materials and specific frequencies or capacities required for effective waste services. The guidance would provide details for household services at kerbside properties, Household Waste Recycling Centres and, if practicable, flats. The service standards delivered through the guidance would outline requirements for separate collection and provide advice on circumstances where separate collection may not be practicable.

The guidance would set out the minimum service standards local authorities would need to consider to provide a good local recycling service and make decisions on frequency of collections, containment and vehicle configuration to address issues such as variations in housing type and local geography. The guidance would help to set a minimum standard for collection services for which evidence is clear that delivery will contribute to recycling performance and consumer satisfaction. The design of the standards would also be such that it would enable local authorities to go beyond the standards and improve service provision for residents, for example to increase the range of materials collected or the frequency of collections should they wish.

A key principle of the proposed guidance would be that the standards should set out minimum standards for current circumstances but that once evidence supports the inclusion of further materials that are currently 'difficult to recycle' or new approaches to separation or waste collection then the guidance could be amended.

The guidance would be updated every few years. These updates would be supported by robust evidence and allow an appropriate lead in time for local authorities and other waste collectors to adjust. The updates would reflect the impact of industry initiatives which affect the recyclability of products and materials considered difficult to recycle, eco-design initiatives and emerging EPR policy. The adoption of the guidance may also be linked to implementation of EPR schemes, under which producers will bear greater responsibility for the end-of-life management costs of the products they place on the market.

Standards on the frequency of residual waste collection

As food waste and dry recycling collections increases we expect the amount of residual waste collected to reduce. Since 2001 residual waste has fallen from approximately 22million tonnes to 13million tonnes. These reductions in the level of residual waste have lead many local authorities to review the frequency of residual collections and reduce them to fortnightly usually with a separate food waste collection. However some authorities have not introduced a weekly food waste collection or have only introduced a fortnightly mixed food and garden waste collection. A small number of local authorities have also moved to three weekly collections of residual waste.

In line with the manifesto commitment to support frequent and comprehensive rubbish and recycling collections the government wants to ensure that householders are not inconvenienced by being unable to get rid of putrescent or smelly waste weekly or having insufficient capacity to recycle or to remove residual waste. We think that alternative weekly collection with weekly separate food waste collection could be a minimum expectation for

householders and where a weekly or more frequent service is needed then local authorities could consider this. Subject to an assessment of affordability and value for money we could make this clear in the proposed statutory guidance on minimum service standards for rubbish and recycling and would assess the costs for this to be included in our consultation on minimum service standards guidance which would take place later in 2019 or early 2020.

We will prepare the draft guidance in discussion with local authorities and waste operators and will consult upon it in our second consultation later this year or early in 2020.

Consultation questions on service standards

Proposal 10

We are proposing to prepare statutory guidance on minimum service standards to which local authorities will be required to have regard. The detail of this guidance will be consulted upon in our second consultation

Q32 Do you agree or disagree with the proposal to publish statutory guidance?

- Agree – government **should** publish statutory guidance
- Disagree – government **should not** publish statutory guidance
- Not sure/no opinion/not applicable

Q33 We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable

Q34 Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week Do you agree or disagree with this proposal?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable

Q35 Do you have any other comments to make about Proposal 10?

Helping householders to recycle through effective communications

If proposals for consistent collections are to be implemented successfully, it will require householders to be well-informed about how they should present waste for collection. As indicated earlier in this document, presence of contamination and non-target materials in recycling bins currently accounts for a significant amount of material rejection at MRFs. Rejected materials often have to be disposed of in landfill sites or sent to Energy from Waste (EfW) facilities at great cost to local authorities. The level of contamination is

particularly acute in on-the-go recycling bins, and our discussions with local authority stakeholders indicate that some services have been withdrawn by local authorities because it is no longer cost-effective to provide these recycling bins.

Apart from contamination issues, there is a considerable amount of recyclable material and organic material which is thrown away in residual waste. According to WRAP's 2018 Recycling Tracker report⁴¹, 54% of households throw away materials into the residual bins that could have been recycled through their local authority collection scheme.

Our initial engagement with local authority representatives indicates that there is some concern that they have limited ability to influence householder behaviour. While changing people's behaviour can be challenging, many householders want to recycle. For example, in WRAP's 2018 Recycling Tracking Survey, 50% of householders said 'I want to be a really good recycler and I take the trouble to ensure that I'm doing everything right'. Therefore, we should make it easier for them to participate by providing clear information. Effective and sustained communications with householders will be critical for ensuring that we achieve our main objectives of increased recycling quantity and quality, and will help to:

- minimise public confusion over what can and cannot be recycled and help increase participation in recycling schemes and minimise contamination
- give the public suitable information on how and where their waste is recycled. Lack of transparency and understanding over whether their waste is actually recycled can often dent public confidence in recycling schemes
- help deter public misuse of collection bins and other poor behaviours, e.g. fly-tipping, vandalism
- build a culture of sustainable waste management underpinned by appropriate waste separation for recycling among householders and businesses
- clarify the responsibilities that local authorities would have for undertaking separate waste collections from households

Labelling packaging for recycling

Our consultation on packaging EPR proposes the introduction of mandatory labelling of packaging. This will require labels to clearly state whether packaging is collected for recycling or not collected for recycling. This will bring an end to confusing 'check locally' messages for recycling and ensure the public can confidently place packaging labelled as collected for recycling in their recycling bin.

There will always be a small minority of householders who ignore recycling information, for example by failing to present their waste properly for collection and thereby risk causing harm to environment health. Government will continue to work with local authorities to ensure that they have the legislative powers they need to help minimise poor behaviour from householders. Government will also continue to work with Recycle Now⁴² and other

⁴¹ <http://www.wrap.org.uk/sites/files/wrap/Recycling%20Tracker%20Report%202018%20-%20Final%20for%20publication.pdf>

⁴² <https://www.recyclenow.com/>

communications partners to ensure that householders and the general public have access to relevant information to help them recycle better.

Information on end destination of recyclable materials

Householders are not always clear on the benefits of recycling and what happens to materials following collection. For example, some people believe that materials are landfilled or incinerated rather than properly recycled, or are sent overseas to be landfilled or otherwise disposed of inappropriately rather than recycled.

We want to ensure that householders have a clearer understanding of where the waste they sort for recycling ends up, and that they are confident that what they do is helping to reduce waste and preserve environmental health. Some local authorities conform to the standards set out in the Resources Association's Charter on the End Destination of Waste⁴³. Changes to the treatment question structure within the data system local authorities use to record waste information (WasteDataFlow⁴⁴) have also provided the facility to improve the transparency of waste treatment for different materials, and wider publicity of end destination might help to support public confidence in recycling. Government is currently undertaking proof of concept work through the GovTech Challenge⁴⁵ to test the feasibility of developing a means of more effectively tracking waste from production, through treatment and final destination, including waste exports. This has potential to provide a more transparent flow of information to the public and industry about recycling and materials flows. If successfully implemented, this may help to increase public and stakeholder confidence in the benefits of recycling.

Consistent collections will make it more efficient and cost-effective to communicate with the public, irrespective of where they live and work in the country. They will also help to improve the labelling of materials for recycling purposes.

Consultation questions on communicating about recycling

Proposal 11

We will continue our support for Recycle Now and the tools produced by WRAP to help local authorities to communicate effectively on recycling.

Q36 Do you have any comments to make about Proposal 11?

Q37 What information do householders and members of the public need to help them recycle better?

⁴³ <https://resourceassociation.com/news/charter-improve-public-information-about-end-destinations-recycling>

⁴⁴ <http://www.wastedataflow.org/> waste data flow is a reporting tool used by local authorities

⁴⁵ <https://www.gov.uk/guidance/the-govtech-catalyst-challenge-process>

Proposal 12

We will work with local authorities and others to improve transparency of information available to householders on the end destination for household recycling.

Q38 Do you agree or disagree with this proposal?

- Agree – government **should** work with local authorities and other stakeholders on this
- Disagree – government **should not** work with local authorities and other stakeholders on this
- Not sure/no opinion/not applicable

Q39 Do you have any other comments to make about Proposal 12?

End markets for recyclable materials

The availability of stable and sustainable end markets for dry recyclables is one of the key drivers for achieving high recycling. Apart from legislative drivers, the income or costs associated with the sale of recyclable materials is often the most important consideration for local authorities when deciding which materials to collect from householders and how these materials are collected. A reliance by the UK recycling sector on overseas export markets for the recycling of various materials, especially paper and plastics, has in recent years exposed local authorities (and their contractors) to price fluctuations and service cost pressures.

The 2 UK-generated recyclable waste streams that are most dependent on export markets for recycling are paper and plastics. According to HMRC trade data, the UK exported 1.96Mt of recovered paper in the first 5 months of 2018, down 4% compared with the same period in 2017. The most important export market for UK-generated dry recyclable materials is China, which has been the leading destination for recovered paper from the UK. The main non-China export destinations for UK paper during this reporting period included India, Vietnam and Indonesia. Together these 3 countries accounted for around 720kt of UK paper exports during 2018, just below that exported to China.

According to HMRC trade data, the UK exported 285kt of recovered plastic (both packaging and non-packaging) in the first 5 months of 2018, down 5% compared with the same period in 2017. The diversion of exports of recovered plastic to non-China/Hong Kong end markets has sustained overall UK exports⁴⁶.

During the first 5 months of 2018, the most notable increases in UK plastics exports in absolute terms went to Malaysia, Vietnam and Turkey. Trade data available for this period showed a doubling in UK exports of plastic to Indonesia (up to 10kt in May).

The export market for recyclables continues to be characterised by instability and price volatility. Apart from restrictions on waste imports announced by China⁴⁷, concern is growing that other economies in South East Asia will also introduce waste import restrictions in the near future. In late June 2018, the government of Thailand banned all recovered plastics from entering its ports. It joined Vietnam and Malaysia who announced

⁴⁶ <http://www.wrap.org.uk/sites/files/wrap/Market%20Snapshot%20June%202018v1.pdf>

⁴⁷ <https://larac.org.uk/news/eas-assessment-china-waste-import-ban-and-resultant-local-issues>

temporary bans on the import of plastics, after being overwhelmed by the volume of recovered recyclables being diverted their way following the restrictions on Chinese waste imports.

The WRAP Market Snapshot released in October 2018⁴⁸ indicates that China's ban on waste imports has caused a significant increase in the premium paid for high quality plastics and paper. The principal export market for recovered plastics is Taiwan, which now accounts for 25% of all UK plastics exports. China has continued to be the predominant export market for waste paper, growing its share of paper imports from 40% over the first 5 months of 2018, to just over 50% since July 2018. Apart from China, alternative destinations for UK-generated paper exports are India, Vietnam, Germany, and the Netherlands.

The ongoing instability in recycling export markets is proving to be a challenge for English local authorities and the difficulties in finding end destinations is putting a strain on the financial viability of recyclables collections from households. In a recent survey of English local authorities undertaken by the LGA, some of the councils that have been most impacted by the recent China waste import bans warned that their recycling costs have increased by £500,000 on average over the last year as a result of the restrictions⁴⁹.

As part of our engagement with key waste industry players, we have been discussing how government can help to increase the availability of UK-based recycling infrastructure going forward. The consensus is that the UK reprocessing market would respond positively to government setting clear policy objectives and providing long-term certainty that waste collection and recycling will be supported. The measures being considered as part of consistent collections, DRS and packaging EPR, will help us achieve greater quantity and quality of recyclable materials. This is anticipated to provide a positive investment climate for the delivery of strategic recycling infrastructure within the UK.

In addition to the ambition to increase supply of high quality recyclate, the government understands the need to also stimulate demand for this material in secondary markets. Given this, at Budget 2018, the government announced a world leading new tax on plastic packaging which does not contain at least 30% recycled plastic content, subject to consultation. This will work hand in hand with a reformed Packaging Producer Responsibility System to stimulate both supply and demand of recycled plastic, helping deliver the government's ambition of moving towards a more circular economy for plastic packaging.

Government recognises that for the proposed waste collection and recycling measures to work effectively, stable markets for waste commodities need to be developed. Government's view is that consistent collections by local authorities, with associated implementation of minimum service standards, and improved material quality, will give investors greater confidence that there will be a steady, sustained supply of quality recyclable materials to enable them to deliver required waste sorting and recycling infrastructure in the UK.

⁴⁸ http://www.wrap.org.uk/sites/files/wrap/Market%20Snapshot%20October%202018_0.pdf

⁴⁹ <https://www.local.gov.uk/about/news/china-waste-ban-impacting-council-recycling-services-and-costs>

Consultation questions on end markets

Proposal 13

Q40 Please use this space to briefly explain any comments you have on the issues discussed in this section.

Developing non-binding performance indicators

We want to ensure that the measures we have discussed in this consultation including having a minimum set of materials to collect, separate food waste collection, and a free garden waste collection, help us to move significantly towards meeting higher targets for recycling. We also want local authorities to continually improve so that they become more efficient and are able to achieve higher levels of recycling. If local authorities implement the changes in this consultation, they would increase recycling significantly. The quality of the day-to-day service delivery, and the extent and quality of communication with householders are also key to increasing participation, yield and better quality of recyclables.

Therefore as part of this consultation, government is seeking views on the benefits of developing a non-binding performance indicators to help local authorities to improve the way waste and recycling services are delivered and to attain high quality and quantity in recycling. We want to know if such an approach would help to support continuous improvement in recycling.

The proposed non-binding indicators would support current publicly available information on local recycling and provide an agreed set of indicators for recycling and waste reduction. This would help local authorities to benchmark their performance and to identify areas for service improvement to increase recycling yield or to reduce residual waste. The performance indicators used would be non-statutory and be transparent and help local authorities understand how their performance contributes to overall municipal recycling rates. This would provide a more detailed understanding of recycling nationally and help the government to understand challenges to local authorities and to offer support or additional intervention were needed.

Discussions with selected local authority representatives suggest that there is interest in this approach, but there are concerns as to how such indicators might be devised and used. Actual performance will be dependent on how positively householders engage with the waste collection systems available to them. Area-specific constraints such as rurality and socio-economic demographics should also be taken into account.

WRAP evidence⁵⁰ suggests that local authority performance is influenced by a number of factors, some of which are contextual variables outside the local authority's control. These can include higher levels of deprivation, which are associated with lower recycling rates, or the increased rural nature of an authority, which is associated with higher recycling rates. Related factors might be the density of housing and the size of gardens for example, which

⁵⁰ <http://www.wrap.org.uk/collections-and-reprocessing/collections-and-sorting/kerbside-collections/reports/factors-influencing-recycling-performance>

might influence the level of garden waste generated. These contextual factors (i.e. outside of the control of a local authority) can explain up to 30% of variation in recycling performance among local authorities. Other factors are more within local authority control, for example the range of dry materials targeted for collection, provision of a separate food waste collection or the capacity of residual waste collection. These can explain 39% - 65% of variation in recycling performance variation.

There is strong case that these influencing factors should be taken into account when considering local authorities' recycling performance. For example it may be appropriate to have separate indicators for green and dry recycling performance or to group authorities according to their context (urban, suburban, rural etc.) and their recycling potential compared to that of similar councils.

We would want to make as much use as possible of currently available information and data sources such as Waste Data Flow to develop these indicators. This would minimise the burden of collecting and reporting data. We would also want to work with local authority bodies and waste operators to develop these performance indicators so that they are useful locally and fit for purpose.

A suite of non-binding performance indicators would allow local authorities to assess services more effectively than just using the overall recycling rate. For example, indicators could take into account the extent of dry recycling and organic recycling collected; the amount of residual waste collected; numbers of complaints on service provision and other factors such as quality or contamination levels.

This approach would reduce the risk that authorities focus on achieving recycling targets at the expense of other activities such as waste prevention or service delivery. This approach should help local authorities to achieve high recycling levels while also reducing the amount of residual waste that needs to be collected.

Waste and recycling indicators could be calculated on a yield basis⁵¹ and aligned to household numbers in a local authority collection area to enable the effect of housing growth to be taken into account. A benefit of retaining household yield indicators is that other metrics such as cost are calculated as household based formulae so can be easily compared.

Subject to consultee views, yield-based non-binding performance indicators could be developed for at least the following material streams:

- dry recyclables (total)
- food waste
- garden waste

We also propose a non-binding performance indicator for residual waste yields. This will incentivise low levels of waste generation, thereby enabling local authorities to make the case for waste prevention and reuse efforts, as well as maximising recycling.

Information on actual performance would be collected from the data submissions local authorities make currently through WasteDataFlow or any successor data reporting system, and would minimise additional reporting burdens on local authorities. We would want to work with local authorities to develop a suitable suite of indicators and to ensure data gathering was straightforward and not burdensome. The indicators would be reviewed on a

⁵¹ By yield we mean kg per household per week, for example.

regular basis to ensure they remain relevant and are of assistance to local authorities in monitoring and waste management and recycling. Any new data set developed with Local authorities will be included in the governments Single Data Set which lists all the datasets that local government must submit to central government⁵²

Consultation questions on non-binding performance indicators

Proposal 14

We propose developing a set of non-binding performance indicators for local authorities to use to monitor waste management and recycling and to highlight where services can be improved to delivery higher recycling and minimise waste. In addition to the headline household recycling rate for the local authority we would propose 4 additional indicators covering the yields of dry recycling, food waste for recycling, garden waste for recycling, and residual waste. We would also work with local authorities to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

Q41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q42 Do you agree or disagree that the proposed indicators are appropriate?

- Agree
- Disagree (please expand ...)
- Not sure/no opinion/not applicable

Q43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

Developing recycling metrics in addition to weight-based metrics

Numerous stakeholders have argued for ways of understanding performance other than the weight of recycling, which underpins current and proposed recycling targets.^{53,54}

Weight (in kilogrammes or tonnes) is currently the common currency for the measurement of waste arisings and recycling performance. Weight is operationally important – for example for specifying lifting equipment and for moving waste around the road, rail and river

⁵² <https://www.gov.uk/government/publications/single-data-list>

⁵³ Ricardo (2018) [Why Wait, Weight isn't Working](#)

⁵⁴ Suez (2018) [A Vision for England's Long-term Resources and Waste Strategy](#)

network. We will therefore continue to use weight-based data to measure and understand performance.

However, weight is not always an important factor for making judgements about whether we are doing well or badly, and it is not necessarily the most important factor for making decisions about policies or services. For example, managing waste has impacts on our climate and our natural capital, not all of which are best considered on a weight basis. It also has economic and social aspects which may best be reflected using financial and economic measures, such as economic value or jobs created, or social measures, such as well-being.

When used in isolation, weight-based decisions can lead to unintended consequences such as a focus on recycling heavier waste materials, e.g. garden waste over other materials whose recycling may achieve greater environmental benefit. It may also incentivise recycling and waste collection led services over waste prevention and reuse, despite the benefits that can be realised from reducing waste or repairing and passing on goods. Weight can also encourage a focus on the quantity of material collected for recycling over its quality. Measuring recycling rates based on weight tends to favour local authorities in suburban and rural areas due to the important influence of garden waste tonnages, whilst authorities in urban areas or those having a higher ratio of flats and HMOs tend to be disadvantaged.

If the UK is to become a world leader in resource efficiency, as set out in the Resources and Waste Strategy and the 25 Year Environment Plan, it will be important that we develop and implement indicators and ways of understanding actual performance – nationally and locally. These should be better suited to reflecting the environmental costs and benefits of managing various waste materials sustainably (environmentally, economically and socially). Discussions with local authority representatives have suggested that new ways of measuring waste management performance would be beneficial but should not replace weight-based metrics. Rather, they should be used alongside existing weight-based metrics.

Further work needs to be undertaken to develop metrics that can be used alongside weight to help us make better decisions. The Resources and Waste Strategy sets out a number of alternative indicators of the impacts of waste which could be used to help us judge the sustainability of resource management at the end-of-life stage. We are not proposing new metrics as part of this consultation but are interested in your views on whether we should supplement weight as the primary means of measuring recycling performance. For example, carbon intensity is one metric that has been used widely as an alternative for measuring recycling performance. Government is currently working with WRAP to develop a suitable carbon intensity metric for measuring and reporting waste management performance.

We would like to hear your views on alternative ways of understanding and reporting the impacts of waste.

Consultation questions on alternatives to weight-based metrics

Proposal 15

We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these as set out in the Resources and Waste Strategy.

Q44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q45 Do you agree that these alternatives should sit alongside current weight-based metrics

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

Promoting joint working between local authorities on waste and recycling

In line with plans to introduce consistent collections and to publish statutory guidance on minimum service standards for recycling, government wishes to encourage greater collaboration and partnership working among local authorities in the area of waste collections and recycling. Partnership working between local authorities can help increase efficiency through sharing assets, management and back-of-house staff, and transferring knowledge and best practice. MHCLG published a report on the procurement benefits arising from joint working in 2015⁵⁵

There are many examples of local authorities collaborating in the area of waste management⁵⁶. These range from having combined service delivery teams to joint procurement of waste management contracts. Examples include both statutory and informal arrangements among councils such as Local Waste Partnerships, Joint Waste Disposal Authorities and Combined Authorities.

District and County authorities already work together through their roles as waste collection authorities and waste disposal authorities respectively. There are also arrangements for payment of recycling credits from Disposal authorities to collection authorities in certain circumstances. In the Resources and Waste Strategy we have committed to reviewing the Recycling Credits systems and will do so as reforms to producer responsibility develop.

In this proposal, however, we are primarily concerned with promoting wider joint working and cooperation where this can support service delivery. Government encourages local authorities to build on existing success stories and optimise opportunities to work together to achieve consistent collections, increased recycling and greater financial savings, for

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418767/150320_Waste_Goods_Procurement_Savings_Opportunities_final.pdf

⁵⁶ <http://localpartnerships.org.uk/wp-content/uploads/2017/05/Delivering-Efficiencies-in-Waste-Services-in-the-East-of-England.pdf>

example through avoided waste disposal costs and improved economies of scale. Our discussions with local authority representatives indicate that, in principle, local authorities would be open to greater collaboration. However, there is a preference for partnerships formed by local authorities themselves based on shared values and objectives, rather than government mandating partnership.

Greater collaboration is expected to be an enabler of greater collections consistency and higher quality recycling. At the same time, consistent collections will also make it easier for local authorities to work together, for example sharing collection vehicles and integrating waste management infrastructure.

Whilst greater collaboration among councils is generally considered to achieve beneficial outcomes, there are examples of instances where local authority partnerships have not achieved desired outcomes and have had to be disbanded. It is important that government and local authorities learn the lessons from both historical and existing partnerships and build on good practice for their own planned partnership arrangements.

Some of the main barriers to improving greater collaboration in waste collection and recycling services, identified through our engagement with local authority representatives include:

- a. local political differences
- b. the different financial positions of different authorities
- c. feasibility costs and transition investment
- d. historic collection methodology and different contract durations
- e. proximity and access to waste transfer infrastructure and vehicle depots
- f. perceived loss of sovereignty or ability to make decisions at a local level
- g. challenges introduced by new governance structures and decision-making capacities

We are interested in your views on the above and your ideas for promoting greater partnership working

Consultation questions on joint working

Proposal 16

We want to support and enable greater collaboration and partnership working between authorities where this would accelerate the move to consistent collections and improve recycling and delivery of services.

Q47 In what way could greater partnership working between authorities will lead to improved **waste management and higher levels of recycling**?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q48 What are the key barriers to greater partnership working?

Q49 How might government help overcome these barriers?

Q50 Do you have any other comments to make about Proposal 16?

Part 2 Measures to improve recycling by businesses and other organisations that produce municipal waste

Background and case for action

We want to increase recycling of packaging material, food and other recyclable material in the wider municipal sectors outside household recycling. This ‘non-household’ municipal sector would include businesses, public organisations (e.g. schools, universities, hospitals and government buildings) and other organisations such as charities and not-for-profit organisations that produce municipal waste. This will help us deliver the desired step change in resource management and carbon emissions reductions. It will also ensure we keep pace with other exemplar countries on recycling and allow us to meet our ambition to recycle 65% of municipal waste by 2035.

We will use a single definition of municipal waste to track recycling of household and non-household waste that is similar in type and quality to household waste. This approach will align with the definition introduced to the Waste Framework Directive

There is currently no robust reporting for waste collection and recycling in the non-household municipal sector. Neither has this sector had many direct policy measures to drive recycling performance.

WRAP and Defra analysis of the sector assumes the recycling rate for the sector around 30%-40%⁵⁷ at the moment. However, the level of recycling has been found to vary significantly over different sectors and sizes of firms and organisations so it is difficult to be certain of exact levels without robust monitoring. The impact assessment assumes a central estimate of 35%, or 7.1Mt of waste, is currently recycled.

The sheer size of the sector and type of waste generated, however, (approximately 2 million businesses and organisations generating in excess of 20m tonnes of waste per year), means that there is potential to make a significant contribution to the overall municipal recycling rate. WRAP estimate the following split for the estimate of 20.3Mt of waste arisings:

- 12.9Mt could be collected as dry material recyclates (including glass)
- 4.0Mt represent total food waste available for recycling
- 3.3Mt are currently non-recyclable materials⁵⁸

Given the high proportion of recyclable materials in the current waste composition for this sector it is thought that with the right measures in place recycling rates in this sector could potentially rise to as much as 74% overall⁵⁹.

⁵⁷ WRAP estimate for the NHM sector’s recycling rate is based on an actual sub-sector profiling of waste generation per material and type of business. Defra’s estimate for commercial and industrial recycling rate is around 40%. See the impact assessment, Annex B.

⁵⁸ Whilst averages are shown for illustration the analysis uses individual sub-sector waste compositions and calculates tonnage for each.

⁵⁹ This is the assumed amount of dry materials and food waste collected across the sector by 2035. See the impact assessment, Annex F.

As with household waste, the Waste (England and Wales) Regulations 2011 require paper, metal, plastic and glass to be collected separately from businesses and other establishments where it is necessary to undergo appropriate recycling or recovery operations and is technically, environmentally and economically practicable. However, waste collection services are generally sold on a per-bin or per-lift basis. Because recycling requires paying for additional bins, businesses and organisations could pay more overall to recycle than to dispose of waste. Cost is a key consideration for businesses and organisations, particularly smaller ones in decisions on managing waste.

Having to pay extra to recycle provides no incentive for businesses to arrange for the separate collection of recyclables and particularly the separate collection of food waste. Moreover, many businesses are not even offered a separate recycling service and might have to go out of their way to obtain these. Current measures designed to increase recycling and therefore reduce carbon emissions from businesses, such as the Landfill Tax, are proving insufficient. Therefore, government intervention is needed to ensure that businesses separate materials for recycling and waste operators collect and recycle them.

We want non-household municipal waste collections and recycling services to be affordable for all businesses and organisations. This isn't the case at the moment – many businesses, particularly the smaller ones, find it very expensive. Research suggests that businesses can reduce their costs if they overhaul or optimise the services they have at the moment through providing more containers for recycling and fewer for residual waste. This transition could be done at the stage where services are procured. Another option would be to work within the current framework of Business Improvement Districts and contract one waste operator to provide all the waste and recycling services for an area. As part of stakeholder engagement activities ahead of this consultation, we have held discussions with industry leaders drawn from bodies such as the ESA, CIWM, REA, as well as private waste companies including Biffa, Veolia and Suez. Additionally, WRAP has undertaken workshops with SME business representatives on our behalf, to better understand the barriers to improving non-household municipal recycling, and to identify suitable mitigation measures. We would like to explore further the possibility of councils that collect both business waste and household waste collecting business waste and household waste at the same time. This may have environmental benefits such as fewer waste disposal journeys along streets where there are both homes and businesses.

These discussions on business recycling indicate that there is a preference for the same consistent approach to household collections to apply to non-household municipal waste. This will support a standardised approach to recycling and make communications easier. As well as improving access to services to recycle, small businesses are likely to need incentives to use the services and targeted action directed at those businesses that refuse to recycle despite support.

It has also been commented that businesses have few incentives to separate their waste for recycling currently. This was thought particularly true for businesses producing small amounts of waste, meaning that the increased costs associated with multiple bin lifts were likely to outstrip any potential savings from residual waste avoidance. Placing responsibility for separating waste for collection on the waste generators, i.e. businesses, rather than the waste collectors would help to ensure waste is presented separately and suitable arrangements are made for its collection with waste collectors providing necessary bins and/or supporting collections infrastructure.

We will engage further with stakeholders throughout this consultation and afterwards, to ensure we get these measures right and minimise costs of implementation.

What changes are we proposing?

We propose to legislate for businesses, public bodies and other organisations to have to segregate their recyclable waste from residual waste in order for it to be collected and recycled appropriately. We have proposed 3 scenarios for this as outlined below. The scenarios government has looked at are all aimed at diverting key materials to meet future targets and obligations, increasing the consistency of services, and keeping services easy to use and access. Our impact assessment sets out 3 different options for improving the collection of recyclable materials from businesses and organisations (non-household municipal waste). These propose that where a business or public sector organisation produces recyclable waste that is similar in nature to household waste it should be separated from residual waste for recycling. The 3 options considered for this are as follows:

Option 1: Separate dry recycling and separate glass

This option would require all eligible businesses and organisations to segregate their dry mixed recycling and glass for collection in 2 streams. The core dry recyclable materials would match those for household waste, i.e. paper, card, plastic bottles, plastic pots, tubs and trays, and metal all collected together (comingled), and glass collected separately. Food waste would continue to be placed in residual waste under this option, unless offered as an optional voluntary service.

This approach is understood to be the most common currently and our IA estimates that, if fully implemented, it would achieve a recycling rate of 58% in the non-household sector.

Option 2: Separate dry recycling and separate food waste

This option would require all businesses and public sector organisations to segregate dry mixed recycling (except glass) and to adopt separate food waste collection. In this scenario, eligible businesses and organisations would collect 5 key dry materials – paper, card, plastic bottles, plastic pots, tubs and trays, and metal. Glass would remain in the residual stream, unless optional additional arrangements were made. Businesses would also present food waste separately for collection. We estimate this could deliver a 70% recycling rate for the non-household sector.

Option 3: Separate dry recycling, separate glass and separate food waste

Under this option, all businesses and organisations will be required to separate dry material, food waste and glass for collection. This option essentially combines Options 1 and 2 and would deliver a 74% recycling rate across the non-household municipal sector.

In all options, the waste materials in scope are those that are covered by the definition of municipal waste on page 8 of this consultation document.

At the moment, very little non-household municipal waste is segregated for recycling. Therefore, at the very least, implementation of Option 1 would see dry recyclables separated from food waste, which would improve quality. Ideally though we would want all eligible businesses and other organisations to separately collect glass and food waste. To make these changes it would be necessary to amend legislation to require businesses and other eligible organisations in this sector to present their waste separately for collection.

We propose that food waste should only be collected from those businesses or organisations that generate sufficient quantities on a weekly basis to justify this. For

example Scotland has limited the application of its food waste collection legislation to food-producing companies that generate 5kg or more of food waste each week. A similar approach could be taken in England. It might also be appropriate to restrict the requirement to firms registered for food hygiene inspection purposes. We would welcome views on whether this is the right approach.

It might also be appropriate to exempt some firms from provisions, for example where they produce very little food waste or recyclable material, and these circumstances are considered below. This might be most appropriate for micro firms where the costs of compliance might be higher.

Government would legislate to ensure materials are segregated from residual waste for collection. Detailed requirements on arrangements for segregation of dry materials, glass and food waste would be set out in guidance and advice would be provided on best practice to assist businesses to comply with requirements. Similar to household collections a core set of recyclable materials would be proposed, which allows for differences in the waste material generated by different establishments and the range of materials can be expanded over time.

We would expect businesses to be able to at least segregate recyclable waste from residual waste in all circumstances so that it can be collected and recycled. We would be interested in views on where this may not be practicable for example for technical, environmental or economic reasons. Decisions on how recyclable material should be collected (ie whether dry materials were collected separately from each other or comingled) would be for businesses and organisations to make with their waste collector in line with the separate collection requirements referred to above and taking account of derogations where comingling would not affect quality or separate collection is not practicable (page 33). Where waste was not appropriately segregated for collection, the Environment Agency would be able to take enforcement action, requiring arrangements to be made for segregating waste as necessary.

Costs of introducing recycling services for business waste

The costs of these options and the numbers of businesses affected are described in the supporting impact assessment. The businesses and other organisations under consideration and relative numbers are set out below:

Table 1: Number of businesses/public units, counts by employment band size and waste arisings in tonnes, England, 2016

Sector		Micro	Small	Medium	Large	Total
Food Manufacturers	Number of businesses	4,695	1,710	720	320	7,445
	Waste arisings in tonnes	23,000	175,000	247,000	1,657,000	2,101,000
Retail & Wholesale	Number of businesses	343,265	71,040	9,420	1,505	425,230

	Waste arisings in tonnes	2,676,000	2,562,000	1,337,000	722,000	7,298,000
Hotels & catering	Number of businesses	106,705	44,345	4,390	205	155,645
	Waste arisings in tonnes	1,305,000	929,000	384,000	43,000	2,661,000
Transport & Storage	Number of businesses	80,000	10,020	3,260	665	93,945
	Waste arisings in tonnes	250,000	343,000	471,000	42,000	1,106,000
Health	Number of businesses	88,565	37,015	6,595	315	132,490
	Waste arisings in tonnes	316,000	695,000	363,000	462,000	1,836,000
Office	Number of businesses	1,052,825	86,250	17,185	3,500	1,159,760
	Waste arisings in tonnes	406,000	382,000	331,000	293,000	1,413,000
Education	Number of businesses	29,095	7,150	2,080	645	38,970
	Waste arisings in tonnes	44,000	1,428,000	1,847,000	527,000	3,846,000
Total number of businesses		1,705,150	257,530	43,650	7,155	2,013,485
Total Waste arisings (tonnes)		5,020,000	6,514,000	4,981,000	3,746,000	20,261,000

The current waste management costs to the sector are estimated at £3.3 billion per year. Micro and small businesses face the highest costs of £1.4 billion and £1.0 billion per year respectively. This is due to the number of micro businesses which account for 85% of the business sector population.

Under Option 3, we estimate that this policy will generate total discounted savings of -£1,206 million from 2023-2035 as a result of a phased-in approach⁶⁰, starting first with business sectors where changes can be implemented most cost effectively. This is because recycling waste costs less than sending it to landfill or EfW and prices charged to businesses for recycling collections are lower than for refuse collections. In other words, for the whole sector, diverting waste away from refuse bins generates savings.

Large businesses would see some savings from higher recycling. In particular, we estimate waste management cost savings of £58 million per year by 2025, or around £255 million annual waste management costs from 2025 onwards. This is a result of full waste separation once 80% of remaining dry mixed materials, separate glass and separate food waste are presented in separate containers and refuse collections are reduced.

Medium businesses could also see some savings from high recycling performance. We estimate these to be £98 million savings from reduced waste management costs, resulting in £515 million per year by 2028 and onwards.

Small businesses are estimated to have up to £116 million savings per year from full waste separation under reduced refuse waste collections and shared service provision of waste services (such as making use of Business Improvement Districts). This would reduce their waste management costs to £851 million per year by 2031. However, there is a significant variation across sub-sectors with some small businesses experiencing net costs.

Micro businesses would be likely most affected in terms of additional waste management costs. Under Option 3, their waste management costs could increase by up to £292 million by 2035, or from £1.38 billion to £1.67 billion per year. Micro businesses may see cost increases because increasing recycling is unlikely to reduce the number of refuse bins a business needs, although capacity could be reduced.

Overall, the full separation of waste materials under prices currently offered from waste management companies would result in cost savings to the whole sector of -4% over the period of 2023-2035 but with significant variation across sub-sectors and business sizes.

Table 2: Option 3 net cost (+) or saving (-) per year against baseline and achieved recycling rate

Sector	Micro	Small	Medium	Large	Total	r.r. (%)
Hotels & Catering	£20.6 million	£9.8 million	£0.7 million	£9.5 million	£40.6 million	78%
Health	£61.8 million	£11.4 million	-£0.2 million	-£7.2 million	£65.8 million	74%
Retail & Wholesale	-£90.0 million	-£125.9 million	-£57.7 million	-£34.7 million	-£308.3 million	76%

⁶⁰ Large businesses start from a baseline recycling rate in 2023 and achieve 80% capture of remaining recyclates currently in residual waste collections by 2025. Medium businesses start seeing improvements since 2026 and achieving 80% capture by 2028. Small businesses improve recycling performance from 2029 and hit 80% capture by 2031. Micro businesses start with improvements in recycling from 2032 and achieve 80% capture by 2035. This results in 74% recycling rate for the whole sector by 2035.

Education	£20.7 million	£2.8 million	-£22.7 million	-£9.5 million	-£8.7 million	69%
Office (& other)	£271.4 million	-£13.2 million	-£14.2 million	-£15.3 million	£228.6 million	74%
Transport & Storage	£5.7 million	-£ 0.7 million	-£3.7 million	-£1.6 million	-£0.4 million	78%
Food Manufacturing	£2.0 million	£0.3 million	£0.3 million	£0.5 million	£3.1 million	59%
Total	£292 million	-£116 million	-£98 million	-£58 million	£21 million	74%

Source: WRAP and Defra analysis

Reducing costs of waste management for small and micro-sized firms

Our analysis shows that large and medium-sized firms should benefit financially from greater segregation of materials for recycling and evidence suggests that some may already have such arrangements in place. This would suggest that costs should be manageable for them and benefits should be realised. For some small and micro firms, however, the costs do increase substantially depending on container types and service level offered. It's important to note that many small and micro businesses use sack type collection systems and so actual costs, particularly under longer term contracts, would be expected to be much lower than the numbers outlined above.

Regardless of actual costs, it is important to develop options with which to mitigate against any cost increase for businesses. We want to identify ways to reduce the costs of waste collection for this sector and support sustainable recycling behaviour. WRAP has worked with small firms and their representatives to explore options for reducing costs; this work is ongoing.

There are a number of measures available that could be used to minimise the costs of waste collection and recycling. Some of these are outlined below and we will assess the utility and costs of these options over the period of this consultation and beyond. We would welcome views on these and also evidence of other measures that may be available to support business recycling and to reduce costs for small and micro firms.

Optimising/rationalising services

Generally, recycling service collections tend to be lower in price than for residual waste. Research suggests that reviewing the containment needs for the business according to the waste and resource materials generated and then maximising the number of recycling containers compared to the residual containers could save businesses money or mitigate against cost increases.

Collaborative procurement projects

This is where a number of businesses in a similar geographic location such as a high street, business estate or shopping centre, work together to procure waste management services. Data suggests that many small businesses are already following this approach in sharing

waste container provision to keep costs down. There are several examples of this approach operating in business improvement districts.

Local franchising of waste services

This model would allow local authorities or other operators to issue contracts for the collection of commercial waste in a particular area of a town or city. This would give exclusive rights for the operator concerned to collect waste. This would reduce the number of operators and hence vehicles involved in collecting waste and also make it more efficient for the waste collectors by maximising the number of pick-ups they could make in a particular area. It would operate in a similar way to business-based collaborative contracts but be managed by local authorities and cover all businesses in a defined area. This approach would require further development and assessment and may require legislative change to be operational.

Combining household and business collections

For small businesses situated within residential areas it may make sense to consider more joint collection opportunities. These options could help increase access to services and improve the economies of scale to reduce costs. Linking into collaborative procurement options and/or bring options would benefit this approach, especially where the material stream collected could be made more consistent. Accounting for the costs and data of the different material flows will be important in ensuring that waste is adequately tracked and accounted for. Combined collections of both business waste and household waste might also offer environmental benefits such as fewer waste disposal journeys along streets where there are both homes and businesses

Investing in more commercial waste drop off sites

As well as doorstep collection, extending the range of facilities that small businesses could use to recycle and dispose of their waste could also increase the convenience and reduce the cost. Already there are good examples of commercial waste bring sites in operation around the country. Central disposal or recycling facilities could be developed for small firms to drop off good quality dry recycling and could be attached to other waste management facilities such as civic amenity sites.

Financial incentives to business

Once access to services and range of materials has improved, other measures to incentivise all businesses to use the collections systems correctly may be necessary. These could include further price reductions for recycling and food collections and higher charging levels for the remaining residual streams. Differential pricing is likely to work better where the collector has control over all of the services under one contract to enable the incentives and disincentives to be apportioned correctly.

Phased introduction of services and or exemptions

A further option to reduce costs would be the phased introduction of requirements for small and micro firms. This would allow more time for these sectors to prepare for the implementation of proposed changes.

Consideration could also be given to whether some categories of small and micro firms should be exempted from provisions in whole or in part, especially where tonnage of dry

recyclables or food waste produced was limited. For example, one-person businesses, for example self-employed tradespeople, may not produce sufficient recyclable waste to justify separate collection. Alternatively, such groups could within certain limits be explicitly allowed to use household waste services to dispose of appropriate household-like business waste, which tends to be what happens currently, albeit illicitly. These exemptions would have to be carefully considered so as not to undermine the overall objective to increase recycling in this sector nor to burden local authorities.

Consultation questions on measures to increase recycling from business and other organisations that produce municipal waste

Proposal 17

We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to legislate so that these establishments have to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste operators.

Q51 Do you agree or disagree that businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q52 Which of the 3 options do you favour?

- Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling
- Option 2 mixed dry recycling and separate food recycling; no glass recycling
- Option 3 mixed dry recycling, separate glass recycling, separate food recycling
- Something else (please expand ...)
- Not sure/no opinion/not applicable

Q53 We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on where this may not be practicable for technical, environmental or economic reasons

- Yes – it should be practicable to segregate waste for recycling in all circumstances
- No – some exceptions are needed for particular circumstances (please provide examples below)
- Not sure/no opinion/not applicable

Q54 Should some businesses, public sector premises or other organisations be exempt from the requirement?

- Yes (which ones and why ...?)
- No
- Not sure/no opinion/not applicable

Q55 Do you have any other comments to make about Proposal 17? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

Proposal 18

Where a business, public body or other organisation produces sufficient quantities of food waste we propose to legislate for this to be separated from residual waste and arrangements made for it to be collected and recycled.

Q56 Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q57 Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q58 Do you have any views on how we should define 'sufficient' in terms of businesses producing 'sufficient' quantities of food waste to be deemed in scope of the regulations?

Q59 Do you have any views on how we should define 'food-producing' businesses?

Q60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?

- Yes (which ones and why ...?)
- No
- Not sure/no opinion/not applicable

Q61 Do you have any other comments to make about proposal 18?

Proposal 19

If the proposals above are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the impact on small and micro businesses.

Q62 What are your views on the options proposed to reduced costs?

Q63 Are there other ways to reduce the cost burden that we have overlooked?

Q64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

Business waste data

As stated above government currently lacks comprehensive data on waste from businesses, public sector organisations and other establishments and there are few data sources available on this. If we want to achieve higher recycling rates for municipal waste we will need to develop and improve the quality of data and information collected on recycling in the non-household sector.

Waste in this sector is largely collected by the private waste management industry and, to date, waste businesses have been reluctant to share the data they gather on waste collected due to its commercial value. In the past, government has commissioned surveys, but they are expensive and prone to inaccuracy so have not been repeated recently, (the last one was undertaken in 2009). As a result, our estimates of business and public sector waste rely on incomplete and fragmented data and a number of assumptions, which impacts on the robustness of the data. This issue must be addressed if we are to assess our progress towards a 65% recycling rate target for municipal waste.

In the Resources and Waste Strategy we have committed to having in place arrangements for businesses to publish or make available information on what is recycled. We want to work with waste producers and waste collectors in this sector to develop more reliable reporting systems for waste and will look at whether we can implement harmonised waste reporting systems that can be used by local authorities, businesses and public sector organisations. For example, we are currently undertaking proof of concept work on waste tracking which, if successful, will help us to obtain more transparent, timely, robust and cost-effective waste management data. We are not consulting on specific proposals for reporting here but will develop proposals with the sector and consult on these as part of a future consultation on detailed measures to implement consistency.

Proposal 20

As part of implementing consistency, we will work with waste producers and waste collectors in the non-household municipal sectors to improve reporting and data capture on

waste and recycling performance of businesses and other organisations. Any requirements will be subject to consultation.

Q65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q66 Do you have any other comment on Proposal 20?

Glossary of selected acronyms and terms

AD (Anaerobic Digestion): A treatment system where organic wastes – mainly food waste – is broken down naturally by micro-organisms under anaerobic (i.e. occurring in the absence of oxygen) conditions. This process produces biogas and fertiliser (digestate).

Business Improvement Districts: A Business Improvement District is a defined area in which a levy is charged on all business rate payers in addition to the business rates bill. This levy is used to develop projects which will benefit businesses in the local area.

CO2e (Carbon dioxide equivalent): CO2e, or carbon dioxide equivalent, is a standard unit for measuring carbon footprints. The idea is to express the impact of each different greenhouse gas in terms of the amount of CO₂ that would create the same amount of warming.

CEP: Circular Economy Package – This is a package of 6 EU packaging and waste related directives which amend existing EU directives including the Waste Framework Directive 2008

Comingled collection: Where all materials collected for recycling are collected together in a single bin or container.

Consistency: In this consultation document ‘consistency’ refers to the range of measures being proposed by the government to improve the quantity and quality of recycling in England. This includes measures such as requiring all local authorities and eligible organisations to collect the same core set of dry recyclable materials, to provide separate food waste collections, and to follow guidance on minimum service standards.

Contamination: Contamination arises from people putting items in their recycling bin that are not collected locally for recycling (i.e. non-target materials), or materials which are not collected as part of dry recycling such as nappies or food waste, or from cross contamination, e.g. shards of glass in paper.

DAs: Devolved administrations

Discounting: Future Benefits or costs arising from a policy measure are considered to have less worth than if they were accrued immediately. This lower worth is accounted for in the impact assessment by applying a discounting factor from the HMT Green Book.

DRS (Deposit Return Scheme): A system whereby consumers of qualifying drinks containers will have a deposit added to the cost of their drinks. The deposit is redeemable following the return of the containers to specified return points or reverse vending machines.

EfW (Energy from Waste): In the context of the Consistency consultation document, this refers to combustion in a specialised plant specifically to generate power and/or heat from waste. This method is typically used to manage residual (‘black bag’) waste.

Producer Responsibility and Extended Producer Responsibility (EPR): A scheme where producers are required to bear greater responsibility for the costs of managing their products at the end-of-life stage. The overall objective of producer responsibility schemes is to incentivise more sustainable product design and increase product recyclability.

GHG (greenhouse gas): Gases that contribute to global warming by absorbing and emitting radiation

HMOs (Houses in Multiple Occupation): Houses with rooms that are rented separately (and at least 3 tenants) and with shared kitchens and/or bathrooms

Household Waste: ‘Household waste’ is defined in the Environmental Protection Act 1990, and comprises:

- all waste collected by waste collection authorities (WCAs) under section 45(1) of the EPA 1990
- all waste arisings from HWRCs established under section 51(1)(b) of the EPA 1990, as explained in Section 5.2
- waste collected by third parties for which collection or disposal re-use or recycling credits are paid under section 52 of the EPA 1990

(This term has a different meaning to that for Waste from Households, which is defined separately in this Glossary.)

HWRC (Household Waste Recycling Centre): A place where householders can take their recyclable materials, residual waste and other specified waste items for management by the Waste Disposal Authority or Council. Otherwise called a Civic Amenity (CA) site, or colloquially known as a ‘tip’ or ‘dump’.

IVC (In-Vessel Composting): A composting process involving the aerobic (i.e. occurring in the presence of oxygen) breakdown of garden waste and food waste in a contained environment, typically containers with roofs or tunnels.

MBT (Mechanical and Biological treatment): A type of waste treatment, typically for residual waste, which combines a sorting facility with a form of biological treatment such as composting or anaerobic digestion. MBT aims to recover recyclates and/or produce a fuel product.

MRF (Materials Recovery Facility): A series of machines that sort waste into different groups, e.g. plastic bottles, paper, tins, etc.

MSW (Municipal Solid Waste): Municipal solid waste includes what is collected from households and also waste similar in nature to household waste generated by businesses, public bodies (such as schools, universities, hospitals and local and national government buildings) and other bodies such as charities or not-for-profit organisations. A more complete definition has been provided in the Consistency consultation document on page 4.

Municipal waste that ends up in sewer/wastewater treatment is not included in this category.

Multi-stream collections: Where materials collected for recycling are collected in distinct groups, in distinct bins or boxes, e.g. plastics, glass and paper are each collected separately from each other.

NHM (Non-household municipal waste): Municipal waste generated by businesses, public bodies, and other organisations that is similar in composition to household waste.

NPV (Net Present Value): Sum of discounted costs and benefits to give a net overall result. A positive NPV implies an intervention is beneficial for society, and vice-versa. Not all costs and benefits can be quantified or expressed in monetary terms, however, so an NPV, while useful, should not be the sole decision-making tool for policy.

Residual waste: ‘Black bag’ waste – waste that is collected so that it can be sent for energy recovery (EfW) or landfill.

Societal cost/benefits: The sum of all costs or benefits from a policy, whether financial, environmental, etc.

TEEP (Technically, environmentally or economically practicable): A mechanism built into existing legislation that allows waste collection authorities to not adhere to legal obligations to separately collect certain wastes because of the negative consequences of doing so.

Two-stream collections: Where materials collected for recycling are collected in 2 distinct groups, e.g. paper, is collected in a separate bin or box to the other recyclables.

WfH (Waste from households): This is 'waste generated by households' and is distinct from household waste (see above).

WfH includes waste from:

- regular household collection
- civic amenity sites
- 'bulky waste'
- 'other household waste'.

WfH excludes waste from:

- street cleaning/sweeping
- gully emptying
- separately collected healthcare waste
- soil, rubble, plasterboard and asbestos waste

Waste Data Flow: A web based data reporting system for local authority waste

WEEE: Waste electrical and electronic equipment

WRAP (Waste and Resources Action Programme): A non-governmental organisation that works closely with Defra to provide research and support with policy delivery.