

WLGA CONSULTATION RESPONSE

Increasing Business Recycling

10 December 2019



The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities and three fire and rescue authorities are associate members.

The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.

The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.

Q1. Do you agree that the level of segregation asked of businesses is acceptable? If no, please state why and an alternative.

We agree overall the level of separation required is acceptable in the appropriate circumstances however for some businesses this will present difficulties.

In some rural areas the private sector do not currently offer recycling collections. The new requirements mean that private companies will need to increase charges to cover costs (or withdraw from commercial collections) and Businesses will therefore face higher charges. Some Local Authorities will also incur additional costs providing source separated collections to these businesses but may have to absorb them to support local business as there is little or no competition from the private sector. It is thought that the costs modelled in the regulatory assessment underestimates the cost impact to rural businesses.

In addition, businesses will need to pay for, and find space to store the additional containers for relatively small amounts of waste. This will impact particularly on small businesses and could affect compliance which may drive more commercial waste into the household stream. In some Local Authorities, particularly rural ones, trade waste is currently collected on domestic rounds for reasons of efficiency and to reduce environmental impact. These regulations may have the unintended consequence of preventing this where the collections are currently commingled.

Q2. Do you agree with the materials that are proposed? If not, please state why.

We agree with the range of materials proposed. However, as there is an All-Wales project underway to develop recycling facilities for Absorbent Hygiene Products, could these be considered for inclusion?

We suggest that there is flexibility in the requirement to collect WEEE and Textiles as these are not routinely collected due to space limitations on vehicles and the relatively small quantities presented. Could bulky waste, on-demand collections and receiving the material via recycling centres be utilised to satisfy the requirement to collect these materials separately?

Q3. Are there particular sub fractions of the specified materials should be either included or excluded from the requirement to keep separate and separately collect (for example, contaminated paper). If there are, please state why.

There could be more clarity on materials that should be collected for recycling. For some plastic and composite packaging types there are few viable outlets and these materials could be considered contamination depending on the collecting organisation. Could some materials be better handled by producer responsibility schemes? TEEP principles could allow authorities to retain some flexibility to apply the proposals proportionally. It is important that the new regulations dovetail with any likely changes to the Collections Blueprint.

Q4. Do you agree that lead in times for the proposals are reasonable? If no, what alternative lead in time would you suggest?

Authorities that do not currently these materials separately will need to make substantial changes to services and infrastructure which will make the proposed timescales problematic. The new

requirements may increase demand for services so time is needed to assess likely impact and develop pricing structures that can fully fund services. The procurement of the new vehicles required could take several months, there is also the requirement to train staff and communicate changes to businesses. Therefore we believe that the lead in times should be extended to allow for practical delivery.

Q5. Do you have any other comments on the impact of these proposals (for example, impacts on your organisation)?

A key area of concern for authorities is about how these proposals will be enforced. If there are no additional resources for NRW then there is the possibility some smaller private businesses may not fully comply leading to a loss of customers and income for authorities.

There are also significant cost implications for some authorities. Many authorities have buildings that need to be adapted with separate bins and collection points etc. This will also bring costs associated with additional tasks such as cleaning and maintenance.

Q6. We would like to know your views on the effects that our proposals to increase business waste recycling would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

There is also the need to consider how changes will be communicated to businesses and individuals where English is not the first language. There is need to ensure that some groups are not disproportionately impacted by enforcement activity for non-compliance

Q7. Please also explain how you believe the proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

It is not clear how businesses', both waste collectors and SME's who operate outside Wales but do some work in Wales or have remote premises are enabled to understand their requirements and how it will be ensured that non Welsh collectors comply.

Q8. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

- There are possible implications for food safety as businesses may need to change how food is managed in their premises. Businesses need to manage these risks which could have implications for a premises hygiene rating. This in turn has implications for LAs enforcing these standards. There is also an additional enforcement burden for authorities enforcing the ban on disposing food waste to the sewer.
 - Additional containers could have a detrimental impact on street scene which may give rise to complaints especially as recycling streams may be collected on different days and in highly visible city centre locations.
 - Some additional clarity will be needed around which premises are covered by the requirements.
 - The adoption of option 3 could potentially lead to more vehicle movements and increased carbon footprint
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FOR FURTHER INFORMATION PLEASE CONTACT

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