
Council's Response to a Plastic Waste Recycling petition - Additional Plastic Waste Collections

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| Committee considering report: | Council |
| Date of Committee: | 09 January 2020 |
| Portfolio Member: | Councillor Steve Ardagh-Walter |
| Date Portfolio Member agreed report: | 10 December 2019 |
| Report Author: | Kofi Adu-Gyamfi |
| Forward Plan Ref: | N/a |

1. Purpose of the Report

Preamble

On the 05 September 2019, a petition was started by Ms Sukey Russell-Hayward on behalf of some concerned residents who wanted to see the collection and recycling of a wider range of plastic waste materials in West Berkshire, and improvements to recycling communications in the District. The petition obtained the necessary number of signatures to trigger a debate by the Council. **The discussion and recommendations in this paper represent the Council's formal response ahead of the plastics petition debate currently scheduled for 09 January 2020.**

- 1.1 In response to the plastics petition, to explain the relevant key issues, constraints and opportunities.
- 1.2 To set out the options available to the Council for the potential collection of new plastic waste types e.g. plastic pots, tubs and trays (PTTs) and to identify the Council's preferred option(s).
- 1.3 To explain to petitioners and stakeholders the measures the Council intends to actively consider, and potentially implement, to ensure that we continue to achieve greater recycling and resource efficiency, improved communications and suitable value for money (VfM) for the Council's ratepayers.

2. Recommendations

- 2.1 It is recommended that, as things stand, the Council does not make any changes to the existing collection service for plastic waste until there is further clarity from the UK Government on emerging waste collection requirements, funding options and the development of established offtake markets for these additional materials.
- 2.2 In the meantime, the Council will actively explore options for the separate collection of food waste at the kerbside. This will achieve considerably more environmental benefits and value for money (VfM) for the Council's ratepayers.

2.3 Additionally, the Council will improve on its recycling communications and education initiatives, so that residents are better informed on what the Council is doing to achieve greater recycling and how residents can continue to support this effort.

Context of Recommendation:

- The Council is currently one of the better performing local authorities in England when it comes to waste recycling (we recycled or composted about 50% of waste from households in 2018/19) and our kerbside collections provision is of a good quality level;
- It will cost the Council up to £1m in capital investment to make necessary modifications at the Council's materials recovery facility at Padworth, so that additional plastic stream can be sorted, plus ongoing annual revenue cost of c. £100k to collect this material;
- Collecting the materials is relatively easy compared to securing a viable recycling destination for the materials in the UK. If exported overseas as done by many of the UK authorities who collect these additional plastics, then the Council will have limited control over what happens to the waste (whether it is effectively recycled or ends up in landfills/rivers); Reference: <https://www.independent.co.uk/news/uk/home-news/recycling-waste-uk-overseas-landfill-pollution-nao-environment-defra-a8458991.html>; and
- A potentially better use of the Council's resources will be to assess options for the introduction of separate food waste collections in the District (food waste currently makes up about 25% of the residual bin). This will significantly improve the recycling performance and will have greater benefits for the environment. Introduction of separate food waste collections will have financial implications for the Council – an initial capital investment in collection vehicles and food waste caddies/containers will be required. However, this will result in ongoing revenue savings from avoided disposal/energy from waste (EfW) use. Introduction of separate food waste collections could be eligible for financial support from the Government as part of emerging national measures.

3. Implications

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|-----|-------------------------|--|
| 3.1 | Financial: | No financial pressure if the recommended approach is adopted. On the other hand, there could be a pressure of £500k to £1m in required capital investment plus estimate of c. £100k in ongoing revenue costs per annum, if the Council decides to collect new plastic waste streams e.g. PTTs in the short term. |
| 3.2 | Policy: | None |
| 3.3 | Personnel: | None |
| 3.4 | Legal: | None |
| 3.5 | Risk Management: | There is a low risk of limited adverse local publicity. This risk is manageable through effective and proactive communications from the Council. |
| 3.6 | Property: | None |
| 3.7 | Other: | None |

4. Other options considered

4.1 The following options have been assessed for the collection and recycling of additional plastic waste streams e.g. PTTs (Table 1).

Table 1: Options Considered

Council's Response to a Plastic Waste Recycling petition - Additional Plastic Waste Collections

| Option | Description | Comment |
|-----------|---|--|
| Option 1 | Do Nothing | This option is not being recommended |
| Options 2 | No change for plastic collections until c. 2022 - 2023, by which time the Council will have certainty around the provision of funding by the Government and the development of a viable market for the reprocessing of these materials, preferably in the UK. | This is the recommended option. |
| Option 3 | Implement changes to include the collection and recycling of additional plastic streams e.g. PTTs by the Council at the earliest possible date e.g. from April 2020. | This option is not being recommended. |

These options are assessed in more detail in Section 6.

Executive Summary

5. Introduction / Background

- 5.1 West Berkshire Council (the Council), is both a waste collection and disposal authority. The Council currently undertakes kerbside waste collection and management service for about 68,400 households. In 2018/19, the Council achieved a recycling (and composting) rate of just under 50%. This makes the Council one of the better performing local authorities in England. The Council's recycling performance has been benchmarked against selected neighbouring authorities in Appendix D.
- 5.2 During summer/autumn 2019, a petition was launched by some concerned residents who wanted to see the collection and recycling of a wider range of plastic materials in West Berkshire, and improvements to recycling communications in the District. The petition obtained the necessary number of signatures to trigger a debate by the Council. The discussion and recommendations in this paper represent the Council's formal response to the plastics petition debate currently scheduled for 09 January 2020.
- 5.3 The Council is committed to continuing to improve its recycling performance. The Council currently collects plastic bottles as part of kerbside recycling; it does not collect other harder-to-recycle plastics such as plastic pots, tubs and trays (PTTs), polystyrene, plastic bags and film.
- 5.4 Collecting additional plastics will be relatively-speaking, the easy part; however, the additional plastic waste materials like PTTs do not currently have a viable market in the UK. There is, therefore, no guarantee that they will be recycled afterwards. A number of local authorities have suffered considerable reputational harm because some waste they have collected and exported overseas for recycling has ended up in landfills or polluting water bodies (Reference: <https://www.bbc.co.uk/news/av/science-environment-48581673/hugh-fearnley-whittingstall-finds-uk-plastic-waste-abandoned-in-malaysia>). These incidents can do lasting damage to public confidence in recycling schemes.
- 5.5 The Council and Veolia's preferred approach is to avoid collecting waste materials for recycling unless there is a market for them and reasonable assurance that they will be recycled. For this reason, we currently do not collect materials without established recycling markets and we recycle all our materials in the UK.
- 5.6 To collect the additional plastics, the Council will need to invest up to £1m in upgrading the sorting technology at the Council's Materials Recovery Facility (MRF) at Padworth, near Reading, together with another c. £100k in ongoing annual revenue costs. As indicated, there isn't yet an established market for these materials, so the investment is unlikely to deliver VfM for the Council's ratepayers.
- 5.7 The UK Government published the Resources and Waste Strategy in December 2018. Key policy measures proposed in the Strategy include requirements for consistency in waste collections and recycling, and reforms to the Extended Producer Responsibility (EPR) scheme for packaging waste. Proposals for consistency in waste recycling include the requirement for all English local authorities to collect the same core set of dry recyclable materials from households from April 2023. EPR changes are also expected to require producers to properly

fund the management of packaging waste instead of the current situation where these costs are being borne disproportionately (about 90%) by local authorities.

- 5.8 In response to upcoming Government measures, many producers are expected to switch from harder-to-recycle packaging materials to minimise environmental burdens and their financial liabilities. This means that the waste mix in c. 2023 will be different from the current one. This means that any short-term changes introduced by local authorities for plastics may soon be redundant.
- 5.9 Further clarity on the Government's final proposals and potential funding sources for local authorities will hopefully be provided in a second round of consultations expected during spring 2020; final proposal are unlikely to be confirmed before the end of 2020 or early 2021. It would be inadvisable for the Council to adopt the collection of new waste types ahead of this timeline due to the risk of uncertainty associated with the actual nature of the changes that will be required by the Government and potential funding sources for local authorities.
- 5.10 The kerbside collection of new plastic waste streams at this time will not deliver suitable VfM for the Council's ratepayers. Additionally, it is unlikely to result in any significant environmental benefit to the Council e.g. there will be no meaningful improvement to the Council's recycling performance. This is supported by the findings of a recent compositional analysis of the contents of the residual (general refuse) bins in West Berkshire conducted during summer 2019. Further details have been provided under Appendix E.

6. Proposal

- 6.1 Option 2 is the option that provides the Council with the most advantageous position, and minimises the financial and operational risks to the Council. It also strikes the right balance between embracing the opportunities e.g. funding, market development and enhanced recycling communications investment etc. that the Government's Resources and Waste Strategy measures could bring; and not adopting changes prematurely in a way that could disadvantage the Council and residents. Option 1 is unlikely to be acceptable on an indefinite basis, especially if the Government moves forward with the inclusion of PTTs in the core set of recyclable materials that local authorities will be required to collect in the near future. Option 3 on the other hand, could expose the Council to financial and reputational risks. For example, if the Council adopts these changes too quickly, only for emerging Government guidance to require further measures, this could be confusing for residents and lead to them disengaging with existing recycling services.

7. Conclusion

- 7.1 West Berkshire Council is a high-performing authority in the area of resource efficiency and achieved a recycling rate of about 50% in 2018/19. The Council remains committed to improving recycling performance and has recently introduced new measures including the installation of recycling bins in Newbury town centre and the launch of the Procycle recycling trial.
- 7.2 There is currently some uncertainty around the Government's emerging waste requirements, provision of funding to local authorities to introduce changes and plans to help develop a viable recycling market for additional plastic types in the UK.

Introduction of new collections for additional plastic waste types, at this time, will not deliver suitable VfM for the Council's ratepayers.

- 7.3 It is recommended that the Council does not implement changes to its kerbside plastic waste collections until after such time as there is further clarity from the Government (c. early to mid-2021).
- 7.4 In the meantime, the Council would undertake relevant feasibility studies and explore introducing separate food waste collections at the kerbside; this will deliver significantly better environmental and VfM benefits. The Council would also continue to improve on its recycling communications with householders and stakeholders, to ensure they have better understanding of how their waste is managed and how they can continue to contribute to improvements in recycling performance.

8. Appendices

- 8.1 Appendix A – Data Protection Impact Assessment
- 8.2 Appendix B – Equalities Impact Assessment
- 8.3 Appendix C – Supporting Information
- 8.4 Appendix D – Benchmarking of West Berkshire's Recycling Performance
- 8.5 Appendix E – Composition of West Berkshire General Refuse Bin

Appendix A

Data Protection Impact Assessment – Stage One

The General Data Protection Regulations require a Data Protection Impact Assessment (DPIA) for certain projects that have a significant impact on the rights of data subjects.

Should you require additional guidance in completing this assessment, please refer to the Information Management Officer via dp@westberks.gov.uk

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| Directorate: | Place |
| Service: | Transport and Countryside |
| Team: | Waste Management |
| Lead Officer: | Kofi Adu-Gyamfi |
| Title of Project/System: | Options for the Collection of Additional Plastic Waste Streams |
| Date of Assessment: | 10 December 2019 |

Do you need to do a Data Protection Impact Assessment (DPIA)?

| | Yes | No |
|--|--------------------------|-------------------------------------|
| <p>Will you be processing SENSITIVE or “special category” personal data?</p> <p>Note – sensitive personal data is described as “<i>data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation</i>”</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>Will you be processing data on a large scale?</p> <p>Note – Large scale might apply to the number of individuals affected OR the volume of data you are processing OR both</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>Will your project or system have a “social media” dimension?</p> <p>Note – will it have an interactive element which allows users to communicate directly with one another?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>Will any decisions be automated?</p> <p>Note – does your system or process involve circumstances where an individual’s input is “scored” or assessed without intervention/review/checking by a human being? Will there be any “profiling” of data subjects?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>Will your project/system involve CCTV or monitoring of an area accessible to the public?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>Will you be using the data you collect to match or cross-reference against another existing set of data?</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>Will you be using any novel, or technologically advanced systems or processes?</p> <p>Note – this could include biometrics, “internet of things” connectivity or anything that is currently not widely utilised</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

If you answer “Yes” to any of the above, you will probably need to complete [Data Protection Impact Assessment - Stage Two](#). If you are unsure, please consult with the Information Management Officer before proceeding.

Appendix B

Equality Impact Assessment - Stage One

We need to ensure that our strategies, policies, functions and services, current and proposed have given due regard to equality and diversity as set out in the Public Sector Equality Duty (Section 149 of the Equality Act), which states:

- “(1) A public authority must, in the exercise of its functions, have due regard to the need to:**
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;**
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; This includes the need to:**
 - (i) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;**
 - (ii) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;**
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, with due regard, in particular, to the need to be aware that compliance with the duties in this section may involve treating some persons more favourably than others.**
- (2) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.**
- (3) Compliance with the duties in this section may involve treating some persons more favourably than others.”**

The following list of questions may help to establish whether the decision is relevant to equality:

- Does the decision affect service users, employees or the wider community?
- (The relevance of a decision to equality depends not just on the number of those affected but on the significance of the impact on them)
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, or a major change to an existing policy, significantly affecting how functions are delivered?
- Will the decision have a significant impact on how other organisations operate in terms of equality?
- Does the decision relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the decision relate to an area with known inequalities?
- Does the decision relate to any equality objectives that have been set by the council?

Please complete the following questions to determine whether a full Stage Two, Equality Impact Assessment is required.

| | |
|---|--|
| What is the proposed decision that you are asking the Executive to make: | To approve the above recommendation(s) for the collection of additional plastic waste materials. |
| Summary of relevant legislation: | N/A |
| Does the proposed decision conflict with any of the Council's key strategy priorities? | No |
| Name of assessor: | Kofi Adu-Gyamfi |
| Date of assessment: | 10 December 2019 |

| Is this a: | | Is this: | |
|------------|-----|--------------------------------------|-----|
| Policy | No | New or proposed | No |
| Strategy | No | Already exists and is being reviewed | Yes |
| Function | No | Is changing | No |
| Service | Yes | | |

| 1 What are the main aims, objectives and intended outcomes of the proposed decision and who is likely to benefit from it? | |
|--|---|
| Aims: | To review options for the collection and recycling of additional plastic waste streams e.g. plastic pots, tubs and trays. |
| Objectives: | Increase recycling service provision. |
| Outcomes: | Increased recycling performance. |
| Benefits: | Improved recycling service. |

| 2 Note which groups may be affected by the proposed decision. Consider how they may be affected, whether it is positively or negatively and what sources of information have been used to determine this. | | |
|--|----------------------------------|------------------------------------|
| (Please demonstrate consideration of all strands – Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.) | | |
| Group Affected | What might be the effect? | Information to support this |
| Age | None | |
| Disability | None | |
| Gender | None | |

| | | |
|---|------|--|
| Reassignment | | |
| Marriage and Civil Partnership | None | |
| Pregnancy and Maternity | None | |
| Race | None | |
| Religion or Belief | None | |
| Sex | None | |
| Sexual Orientation | None | |
| Further Comments relating to the item: | | |
| None | | |

| | |
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| 3 Result | |
| Are there any aspects of the proposed decision, including how it is delivered or accessed, that could contribute to inequality? | No |
| Please provide an explanation for your answer: Not applicable | |
| Will the proposed decision have an adverse impact upon the lives of people, including employees and service users? | No |
| Please provide an explanation for your answer: Not applicable | |

If your answers to question 2 have identified potential adverse impacts and you have answered 'yes' to either of the sections at question 3, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.

If a Stage Two Equality Impact Assessment is required, before proceeding you should discuss the scope of the Assessment with service managers in your area. You will also need to refer to the [Equality Impact Assessment guidance and Stage Two template](#).

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|--|----|
| 4 Identify next steps as appropriate: | |
| Stage Two required | No |
| Owner of Stage Two assessment: | |
| Timescale for Stage Two assessment: | |

Name: Kofi Adu-Gyamfi

Date: 10 December 2019

Please now forward this completed form to Rachel Craggs, Principal Policy Officer (Equality and Diversity) (rachel.craggs@westberks.gov.uk), for publication on the WBC website.