
Options Assessment Report for the Collection and Recycling of Additional Plastic Waste Streams – Supporting Information

1. Introduction/Background

Preamble

During summer/autumn 2019, a petition was started by 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 West Berkshire Council (the Council), is both a waste collection and disposal authority. The Council currently undertakes waste collection and management 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 and it is on course to make a positive contribution to the achievement of the UK's 2020 target of recycling at least 50% of household waste (Note: this is an EU target for the whole of the UK; this target has not been passed down by the UK Government onto individual local authorities).

1.2 The Council's recycling service is managed by Veolia, under the long-term waste PFI contract. Dry recyclable materials currently collected at the kerbside in West Berkshire include:

- Plastic bottles, aerosols, can and tins;
- Glass bottles and jars;
- Paper and cardboard; and
- Textiles.

The recyclable materials collected from households and the household waste recycling centres (HWRCs) in West Berkshire are sent to the Council's Materials Recovery Facility (MRF) at Padworth, near Reading, for sorting before being transported to reprocessors in the UK.

1.3 Even though the Council currently collects plastic bottles from households, it does not collect other harder-to-recycle plastics such as plastic pots, tubs and trays (PTTs), polystyrene, plastic bags and film, as part of the existing kerbside recycling service. During July - August 2019, a petition was started by some residents requesting that the Council should provide improved services for the collection and recycling of domestic plastic waste, and provide better communications on recycling. This was linked with press reports

that some residents were offering collection points at their homes for additional plastic waste and driving these to nearby supermarkets for recycling.

1.4 Whilst plastic bottles have an established offtake market, these additional plastic waste materials such as PTTs do not currently have a viable UK market. The range of polymers found in these additional plastic materials cannot be successfully sorted in the Council's MRF without the need for significant further investment in new equipment, which at this stage would be prohibitively expensive for the Council.

1.5 How come many local authorities and some supermarkets manage to collect PTTs but West Berkshire doesn't?

It is true that many UK English local authorities collect PTTs (estimates of between 70 and 80% of councils). However, the key point to note is that the fact that a material is collected does not necessarily mean it is actually recycled. As indicated, there is currently not a viable market for these additional plastics in the UK. This means those additional plastic materials are typically exported overseas for recycling. Once exported, there is very limited control over what actually happens to the materials. A report by the National Audit Office (NAO) in July 2018 found that there the existing Government oversight measures for monitoring exported recycling were not robust enough and the NAO was critical of UK authorities for relying "on exporting materials to other parts of the world without adequate checks to ensure this material is actually recycled" (Reference: <https://www.nao.org.uk/wp-content/uploads/2018/07/The-packaging-recycling-obligations.pdf>). This led to some unfavourable media reports of UK recycling potentially ending up in overseas landfills and rivers (Reference: <https://www.independent.co.uk/news/uk/home-news/recycling-waste-uk-overseas-landfill-pollution-nao-environment-defra-a8458991.html>). Furthermore, a recent BBC investigation found that plastic waste from some UK local authorities had been dumped in a Malaysian landfill and address labels on some of the packaging was used to identify the councils from which the waste could have originated (Reference: <https://www.bbc.co.uk/news/av/science-environment-48581673/hugh-fearnley-whittingstall-finds-uk-plastic-waste-abandoned-in-malaysia>). This resulted in considerable reputational harm to the UK local authorities implicated.

The Council and Veolia's preferred approach is to avoid collecting waste materials for recycling unless there is suitable assurance that they will be recycled. We believe this is the most suitable approach for ensuring we are transparent and accountable in how we engage with our residents for recycling; this approach also minimises the risk of inadvertently contributing to environmental pollution overseas.

In the instances where some nearby supermarkets have been accepting a wider range of plastics than currently allowed under West Berkshire's kerbside collection service, it is important to emphasise that it is entirely appropriate for producers and retailers to take ownership and bear greater financial responsibility for the packaging they put on the market. This is at the heart of the Government's proposed reforms to the Extended Producer Responsibility (EPR) scheme for packaging waste. Current estimates are that local authorities are disproportionately bearing the costs for managing packaging waste i.e. about 90% of these costs, whilst producers are only paying about 10% of these costs.

1.6 The UK Government published the Resources and Waste Strategy in December 2018, with the aim of helping the UK to move to a more circular economy and become a world leader in resource efficiency. This was followed by consultations during early 2019 on some key policy measures set out in the Strategy, such as consistency in waste

collections and recycling for households and businesses, a deposit return scheme (DRS) for selected packaging materials, and reforms to the packaging EPR scheme.

1.7 The consultation on consistency recycling is particularly relevant to this discussion. For example, the proposals consulted on include the Government's ambition for all UK local authorities to collect the same core set of dry recyclable materials from households from April 2023. The only material types on the initial core set proposal that is not currently collected by the Council are PTTs. Importantly, the Government has made commitments, in the Strategy consultations and via other ministerial responses, to funding any new financial burdens placed on local authorities in the adoption of required new waste collection and recycling measures. This funding is anticipated to cover both upfront investments in vehicles or bins, and ongoing operational costs linked to waste collection and recycling. Under packaging EPR reforms, producers will be required to bear greater financial responsibility for the management of packaging they place on the market. Some of the funds raised from the EPR system will be used to fund local authority costs for managing packaging and support comprehensive recycling communications with householders at both national and local levels.

1.8 Potential reforms to the packaging EPR system could result in producers changing their manufacturing processes and a shift away from the use of specific packaging types e.g. PTTs to minimise their cost liabilities under the new EPR system. This is because the EPR system will likely use modulated fees, whereby producers will be required to pay more for the management of packaging types which are harder to recycle or for which the offtake market is not fully established, to incentivise producers to move to more recyclable packaging materials. In other words, **some of the additional plastic waste streams currently in use may not be used on a large scale by manufacturers in the near future**. Some changes in packaging formats are already under way and many retailers are offering plastic-free aisles and refill options for various products from cereals to cosmetics. Given the uncertainties and the changes anticipated ahead of the implementation date (c. April 2023) for the new Strategy measures, it will not be advisable for the Council to introduce the collection of new plastic materials at great financial cost.

1.9 Further clarity on final Government proposals and potential funding availability will hopefully be provided in a second round of consultations expected during spring 2020, in which the Government will set out its preferred options for various consistency, DRS and packaging EPR measures. It is possible that the core set will be amended in the final Government proposals based on stakeholder feedback. The Government is also anticipated to publish statutory guidance covering minimum service standards for waste collection and recycling in England around the same time as these second stage consultations. **The final set of Government proposals may not be settled until the end of 2020 or early 2021**. It may be inadvisable for local authorities to adopt the collection of a new material stream ahead of this timeline; it is possible that more changes would be required by the Government following further engagement with stakeholders.

1.10 The collection of new plastic waste streams is unlikely to result in any significant environmental benefit to the Council or help to meaningfully improve the Council's recycling performance. This is supported by the findings of a recent compositional analysis of the contents of the residual (i.e. general refuse) bins in West Berkshire conducted during summer 2019. Further details have been provided under Section 2.

1.11 **Procycle Recycling Trial:** The Council remains committed to improving its recycling performance and will continue to work with Veolia to explore additional ways of delivering value for money (VfM) recycling services to residents. For example, under the

leadership of the Executive Member for the Environment, the Council has started a trial of Veolia's Procycle¹ recycling initiative targeting harder-to-recycle plastic materials from November 2019. Under the trial, recycling boxes have been positioned in Council and public buildings including the Market Street and West Street House Council office buildings in Newbury, Newbury Library, Northcroft Leisure Centre and Theale Library. The materials being targeted for collection are sweet wrappers, plastic toys and empty toiletries bottles used in the Council's staff showers and changing rooms. The Council has circulated a press release to [publicise](#) the launch of the Procycle initiative and initial feedback from the public especially on social media has been very positive.

1.12 Additionally, 8 new recycling bins were installed in Newbury town centre in September 2019 to help capture more plastic bottles and metal cans used on-the-go by the public. The Council will actively monitor the success of these new recycling schemes e.g. the effectiveness of public participation and contamination levels, and assess whether it will be environmentally beneficial and deliver value for money (VfM) to roll them out on a wider scale to other parts of the District.

1.13 Improvements in waste recycling and sustainable resource use will contribute to the Council's strategic priorities e.g. to "maintain a green district" and support the achievement of the measures emanating from the Council's declaration of a Climate Emergency in July 2019. Better waste and resource efficiency will also support the objectives set out in the Council's forthcoming Environment Strategy.

2. Supporting Information

2.1 **Compositional Analysis of Residual Waste Bins:** to better understand the potential opportunity to improve recycling, the Council conducted composition analyses of black bin waste collected in West Berkshire during winter 2018 and summer 2019. The results of the latest survey has been shown graphically under Appendix E. This indicates the amount of food waste in the black bin (about 25%) is significantly higher than the amount of PTTs (3.5%), with the potential to improve the Council's recycling performance if food waste were to be collected separately. Separate collection of food waste could increase the current recycling rate from c. 50% to 57.2%, compared with 50.8% if PTTs were collected. Separate food waste collection will be beneficial for the environment - especially if anaerobic digestion (AD) is used for its treatment instead of composting - and also result in significant financial savings for the Council. Feasibility work for the potential separate collection of food waste will be undertaken from early 2020.

2.2 Initial assessments indicate that a significantly high investment of c. £500k to £1m will be required in MRF sorting technology upgrades at the Padworth facility to enable PTTs to be sorted effectively. There will also be additional costs linked to the introduction of at least one more kerbside collection round and associated collection crew. These significant costs aside, the PTTs extracted will then have no viable UK recycling market, as things stand, and may have to be sent to EfW facilities.

2.3 An important consideration is that if the Council implements the collection of additional plastic streams e.g. PTTs too far ahead of the Government's April 2023 proposed start date, then without prior assurances of Government funding, the Council may not be able to make a justifiable claim for retrospective funding.

¹ <https://www.veolia.co.uk/press-releases/new-procycle-service>

3. Options for Consideration

3.1 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

Option	Description	Comment
Option 1	Do Nothing	This option is not being recommended
Options 2	No change 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 4.

4. Proposals

4.1 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.

4.2 **Improving Communications:** the Council will be implementing further improvements to how we communicate recycling messages to householders. It is apparent that some residents do not fully understand the good work that the Council is currently doing in the area of recycling and also where their collected waste ends up. We will be using the range of available tools including social media channels, newsletters to households, bin hangers and recycling-centred story books for local school pupils. The livery on the existing waste collection fleet would be updated in the coming months with positive recycling messages that can engage householders.

5. Conclusion

5.1 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.

5.2 There is currently 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.

5.3 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).

5.4 In the meantime, the Council will actively explore introducing separate food waste collections at the kerbside; this will deliver significantly better environmental and VfM benefits for the Council's stakeholders. The Council will also continue to improve on its recycling communications with householders to ensure they have better understanding of how their waste is managed.

6. Consultation and Engagement

6.1 This matter was discussed at a recent Strategic PFI Contract Meeting held on 19 September 2019 between relevant senior Council and Veolia representatives.

6.2 An options assessment paper on this topic with relevant recommendations was presented to the Council's Environment Board on 17 October 2019.

6.3 Another paper on this matter was also presented to Corporate Board on 19 November and 03 December 2019.

6.4 This paper was presented to the Council's Operations Board on 19 December 2019.

Background Papers:

None

NOTE: The section below does not need to be completed if your report will not progress beyond Corporate or Operations Board.

Subject to Call-In:

Yes: No:

If not subject to call-in please put a cross in the appropriate box by double-clicking on the box and selecting 'Checked':

The item is due to be referred to Council for final approval

Delays in implementation could have serious financial implications for the Council

Delays in implementation could compromise the Council's position

Options Assessment Report for the Collection and Recycling of Additional Plastic Waste Streams – Supporting Information

Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months

Item is Urgent Key Decision

Report is to note only

Wards affected: *(add text)

Please put a cross in the appropriate box(es) by double-clicking on the box and selecting 'Checked':

Strategic Priorities Supported:

The proposals contained in this report will help to achieve the following Council Strategy priority(ies):

- PC1: Ensure our vulnerable children and adults achieve better outcomes**
- PC2: Support everyone to reach their full potential**
- OFB1: Support businesses to start, develop and thrive in West Berkshire**
- GP1: Develop local infrastructure to support and grow the local economy**
- GP2: Maintain a green district**
- SIT1: Ensure sustainable services through innovation and partnerships**

The proposals contained in this report will help to achieve the above Council Strategy priorities by [April 2023](#).

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