

# Consultation on consistency in household and business recycling collections in England

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## Valpak draft response

**1. Would you like your response to be confidential?**

No

**2. What is your name?**

Ben Storer

**3. What is your email address?**

Ben.Storer@valpak.co.uk

**4. What is your organization?**

Other

**What is the name of your organization? Or if you chose 'other' above please provide details.**

Valpak Limited, Producer Compliance Scheme, approximately 150 employees

## 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."**

**5. 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 material

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

Agree

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

- There may be additional space considerations in flats, for example source separation may not be possible into several different bins. There may also be further considerations into how occupants could segregate waste in the flat, and then re-segregate at a communal area. When flats are being built, the new requirements should be taken in consideration, however may not be able to be fitted retrospectively.

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

- No response

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### 9. 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.

- The core set of recyclable materials should be set along with the “approved list” of recyclable / non-recyclable material under the reformed Packaging system. When the approved list is being devised careful consideration should be made to any possible unintended consequences, for example encouraging use of materials with an overall higher environmental impact. We also strongly agree that all actors in the supply chain should be involved in adoption of the approved list. It would be important to ensure that the approved list is reviewed and updated regularly to keep up to date with the latest technology and material advances.
- We agree that there will be distributional impacts, with some local authorities achieving cost savings, others facing net cost increases. We welcome further research and evidence on these costs, including, what mechanisms will be introduced to compensate losses and how these will impact on full net cost to producers under EPR.
- The modelling of cost savings in the municipal sector do not account for the impact of economies of scale through standardisation in recycling collections. We consider that these should be included as we expect this could add further savings which would feed through to lower full net costs to producers.

## 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.”**

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

**Glass bottles and containers:** Included

**Paper and card:** Included

**Plastic bottles:** Included

**Plastic pots tubs and trays:** Included

**Steel and aluminium tins and cans:** Included

### 11. 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?

**Food and drinks cartons:** No opinion

**Plastic bags and films:** Included, but phased in over time

**Other Materials (please specify):** aluminium aerosols and foil containers – included from the start

### 12. 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.

- All materials are potentially valid options
- The decisions on which materials to include should be based on the best available data and detailed impact assessments on each option
- Each option should be accompanied by a comprehensive cost/benefit analysis and analysis using the three recyclability criteria
- The analysis should take into account wider policy decisions for example decisions on EPR reform

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**13. 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?**

- Please see response to questions 11 & 12

**14. Do you have any other comments to make about Proposal 2?**

- Inconvenience costs to households and businesses of moving to consistency are not monetised despite the scale of change expected.

## 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.”**

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

Yes

**16. 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...**

- In order to add a core material, all actors within the supply chain should be consulted
- All materials are potentially valid options
- The decisions on which materials to include should be based on the best available data and detailed impact assessments on each option
- Each option should be accompanied by a comprehensive cost/benefit analysis and analysis using the three recyclability criteria
- The analysis should take into account wider policy decisions for example decisions on EPR reform

**17. Do you have any other comments to make about Proposal 3?**

- No response

## 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.”**

**18. Which aspects of the proposal do you agree and disagree with?**

- At least a weekly collection of food waste:** Agree
- A separate collection of food waste (i.e. not mixed with garden waste):** Don't have an opinion
- Services to be changed only as and when contracts allow:** Don't have an opinion

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- iv. **Providing free caddy liners to householders for food waste collections:** Don't have an opinion

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

- Don't have an opinion

**20. 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?**

- We have provided responses to this proposal based on the impact on packaging waste recycling and EPR reform.
- While costs and benefits related to organics (food and garden) are important drivers of overall performance, for stakeholders focused on packaging recycling (and EPR) it would be very useful to separate out impacts on packaging recycling performance, and monetised benefits and costs. This would greatly increase transparency in terms of full net cost considerations.
- A benefit from reduced contamination in dry recyclables, including packaging materials, is widely accepted as being linked to separate food waste collections. These could be reflected in higher prices for dry recycled materials and/or lower gate fees and sorting costs. It is not clear whether such benefits have been estimated in the modelling.
- The consistency scenarios are modelled on change in 2019 that is 'rolled forward' to 2023. The modelling assumes that local authorities with soon-to-expire waste management contracts continue their current arrangements to 2023. We understand significant numbers of new local authority contracts will be renegotiated by 2020. Therefore, potential cost implications to producers beyond 2023 need to be quantified and clearly articulated.

## Proposal 5:

**"We will provide funding and support to Local Authorities to help put in place the necessary collections infrastructure"**

**21. 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

**22. Do you have any other comments to make about proposal 5?**

- We acknowledge the focus of the consistency IA is on collection and recycling. However, there are likely to be negative economic impacts on existing infrastructure, for example, material reprocessing facilities. Similarly, wider benefits and costs to reprocessors of additional collection and recycling of packaging materials needs to be integrated into the cost benefit analysis.

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### 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.”

23. What are your views on this proposal?

- No response

### 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.”

24. Which aspects of this proposal so you agree or disagree with?

- No response

25. Do you have any other comments to make regarding proposal 7?

- No response

### 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.”

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

Yes

We broadly support this approach however TEEP requirements for separate collection should be applied.

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

- No response

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

- No response

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### 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.”

#### 29. Do you agree or disagree with this proposal?

Not sure.

- Changing containers could be very costly and result in considerable levels of waste. It may be more important, providing residents know the system in their area, for systems to cover the same materials and instructions on packaging to be standardised than to necessarily have identical actual containers.

#### 30. 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

- Please see response to question 29

#### 31. Do you have any other comments to make about proposal 9?

- No response

### 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.”

#### 32. Do you agree or disagree with the proposal to publish statutory guidance?

Agree – government should publish statutory guidance

#### 33. 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

#### 34. 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?

No opinion

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### 35. Do you have any further comments to make about Proposal 10?

- With regards to question 33, the maximum guidance review should be every few years, however this should be completed more frequently if there is a significant change in UK recycling technology or other recycling capability.

### 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.”**

### 36. Do you have any comments to make about Proposal 11?

The proposal for boosting national recycling communication campaigns (as proposed in the packaging reform consultation) and any communications if a DRS is introduced should also be taken into consideration. Other vehicles may well be appropriate (for example by businesses such as retailers) provided they are consistent with the agreed national campaign.

It would be helpful where possible to align communication messages amongst the Devolved Administrations so that producers can develop packaging formats which are consistent with all collection systems.

### 37. What information to householders and members of the public need to help them recycle better?

- Clear and consistent communications
- Clear labelling on packaging, including any separation requirements as applicable
- The recycling options available to them
- The damaging environmental effects that not recycling would bring
- Any penalties that may be incurred, if applicable (i.e. new householder Duty of Care requirements)

### 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.”**

### 38. Do you agree or disagree with this proposal?

Agree – government should work with local authorities and other stakeholders on this

### 39. Do you have any other comments to make about Proposal 12?

- No response

### Proposal 13:

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

- Please see our separate responses to the packaging EPR, DRS and Plastic tax consultations

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### 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.”

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

Agree

**42. Do you agree or disagree that the proposed indicators are appropriate?**

Disagree

There should be an additional indicators specifically for the packaging waste stream covering, for example, material quality and quantity for recycling. Under the EPR proposals packaging producers will be required to fund full net cost for packaging recycling so it is extremely important that there is transparency in terms of the efficiencies of collections and also to ensure there is no cross-subsidisation of funding from packaging waste stream to other material streams or other areas of Local Authority activity.

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

- No response

### 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.”

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

Agree

**45. Do you agree that these alternatives should sit alongside current weight-based metrics**

Agree

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

This is for government to decide.

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- Alternative metrics may well provide useful guidance on appropriate target levels and environmental benefits, but it is also important to recognise the practical issues likely to be encountered in daily operations. So whilst, for example, carbon assessment may be a useful indicator it cannot be routinely measured operationally and will need to be converted back into weight to be practicable.

## 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.”**

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

- This kind of cooperation could well enable improvements in technology and also economies of scale which could improve performance (such as material quantity and quality) whilst also reducing costs.

### **48. What are the key barriers to greater partnership working?**

- This is not an area of our detailed expertise, but there may well be differing political priorities in different areas and also practical difficulties in coordinating contract reassessment dates.

### **49. How might government help overcome these barriers?**

- No response

### **50. Do you have any other comments to make about Proposal 16?**

We agree there is substantial uncertainty from modelling based on partial and indicative costs rather than actual costs. We welcome further evidence work on costs, in particular cost implications of changes in arrangements between two-tier authorities, and joint waste collection/disposal as we understand the modelling approach assumes all local authorities are unitary authorities.

## 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.”**

### **51. 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

### **52. Which of the three options do you favour?**

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Not sure

**53. 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**

Not sure

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

Yes

For practicality, especially for very small or micro businesses, it may be required to introduce a de minimis level. This should be thoroughly analysed and full cost benefit analysis completed.

**55. 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?**

- For question 52 we would welcome both options 1 and 3 as both maximise the amount of packaging waste collected for recycling (option 2 does not include glass). The preferred of these two options should be based on thorough economic and cost benefit analysis, in line with the desired governmental outcomes
- Option 2 does not consider collection of glass packaging, either in mixed dry recyclates or separately. Glass packaging remains in residual waste. The rationale for this needs to be clearer. As a minimum a separate analysis demonstrating that the benefits of keeping glass packaging in residual are outweighed by costs. The implication on full net costs to producers also needs to be quantified.
- We agree that there is a lack of robust data in the non-household municipal sector in general and welcome plans to improve quality of data, in particular transparency of costs in this sector (and the wider municipal sector) is of fundamental importance to producer full net cost estimates.
- Transition costs are separately modelled and reported for households but not for the non-household municipal sector, the latter could be substantial and sustained to 2032 due to the phased switching to consistent services by business in the scenarios.
- Policy support costs are accounted for the non-household municipal sector but are assumed constant across scenarios. We would expect this to vary across scenarios and be higher where the greatest change is anticipated.
- Inconvenience costs to households and businesses of moving to consistency are not monetised despite the scale of change expected. While the household survey discussed in the IA suggests this may not be important for households, it is far from clear that such costs would not be significant for businesses.
- We agree that there will be distributional impacts, with some local authorities achieving cost savings, others facing net cost increases, and that especially for micro businesses there are net costs. We

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welcome further research and evidence on these costs, including, what mechanisms will be introduced to compensate losses and how these will impact on full net cost to producers under EPR.

### 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.”**

**56. 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

**57. 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?**

Not sure

**58. 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?**

- A benefit from reduced contamination in dry recyclables, including packaging materials, is entirely plausible if food waste is separated for collection
- For practicality, especially for very small or micro businesses, it may be required to introduce a de minimis level. This should be thoroughly analysed and full cost benefit analysis completed
- It would be useful for businesses which operate sites across the UK if de minimis / definitions were coordinated across the UK nations

**59. Do you have any views on how we should define “food producing” business?**

- It would be useful for businesses which operate sites across the UK if de minimis / definitions were coordinated across the UK nations

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

- No response

**61. Do you have any other comments to make about proposal 18?**

- No response

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### 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.”**

#### 62. What are your views on the options proposed to reduce costs?

- For practicality, especially for very small or micro businesses, it may be required to introduce a de minimis level. This should be thoroughly analysed and full cost benefit analysis completed
- Inconvenience costs to households and businesses of moving to consistency are not monetised despite the scale of change expected. While the household survey discussed in the IA suggests this may not be important for households, it is far from clear that such costs would not be significant for businesses.
- We agree that there will be distributional impacts, with some local authorities achieving cost savings, others facing net cost increases, and that especially for micro businesses there are net costs. We welcome further research and evidence on these costs, including, what mechanisms will be introduced to compensate losses and how these will impact on full net cost to producers under EPR.

#### 63. Are there other ways to reduce the cost burden that we have overlooked?

- No response

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

- Providing further guidance on how to go about making the necessary practical and contractual changes would be useful.

### 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.”**

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

Not sure

#### 66. Do you have any other comment on Proposal 20?

- Businesses should already have data available to report data on their recycling performance via waste transfer notes or consignment notes and any waste data returns from their waste management contractor. However data collation may be difficult from a practical viewpoint as a large amount of this

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information may be either on a yearly note, and may also be on a number of individual paper-based notes.

- We understand that government are currently working with a number of potential contractors to develop a more sophisticated waste tracking database, and we would suggest only once this is available to all businesses should a requirement to report at an individual business level be introduced.

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