

Consistent Collections (England)

Summary of Valpak Draft Response to Consultation on Updated Proposals

FOR VALPAK MEMBERS ONLY

Background

Defra has published its updated proposals for standardising the recycling collections from all household kerbsides in England, as well as the materials that businesses must segregate for collection for recycling in England. The initiative is commonly known as Consistent Collections.

The updated proposals, which build upon those first published in Spring 2019, have been announced as part of a **10-week period of public consultation** on them across the middle of 2021.

Defra are welcoming responses to the questions posed within their consultation document, found [here](#) until **4th July 2021**.

This document contains Valpak's draft response to Defra's updated proposals that we are making on behalf of members. Please note that as we are responding on behalf of members as your producer responsibility scheme, there are **many questions posed within the Consistent Collections consultation which are outside the realm of Valpak's expertise**. In these instances, we intend to either not offer a response or state that Valpak does not have enough knowledge of the topic to offer an informed response. Where this is the case, we believe that valuable insights will be best offered by more knowledgeable stakeholders from the waste management sector.

If you would like Valpak to consider making particular comments about the Defra's updated proposals within our consultation response, please get in touch.

Draft Responses

Proposal 1 - Collection of dry recyclable materials

Q6. Do you agree or disagree that local authorities should be required to collect the following dry materials from all households, including flats, by the end of the financial year in which payments to local authorities under Extended Producer Responsibility for packaging commences (currently proposed to be 2023/4 subject to consultation)?

| | Agree – this material can be collected in this timeframe | Disagree – this material can't be collected in this timeframe | Not sure / don't have an opinion / not applicable |
|--|--|---|---|
| Aluminium foil | X | | |
| Aluminium food trays | X | | |
| Steel and aluminium aerosols | X | | |
| Aluminium tubes, e.g. tomato puree tubes | | | X |
| Metal jar lids | X | | |
| Food and drink cartons, e.g. TetraPak | X | | |

Q7. If you have disagreed with the inclusion of any of the additional materials above in the timeframe set out, please state why this would not be feasible, indicating which dry recyclable material you are referring to in your response.

Although some tubes which are principally metal (e.g. tomato puree tubes) may be straightforward to recycle, there are many other types of tubes which are metal-plastic laminates. Will believe these are much more complex to recycle and believe there are limited facilities to recycled them in the UK. As a result, we suggest further work is needed to determine the feasibility of this proposal.

We do however believe that there are likely to be sufficient facilities for recycling food and drink cartons, but further work may be needed to check the ability of MRFs to effectively sort cartons.

Q8. Some local authorities may not be able to collect all these items from all households at kerbside by 2023/24. Under what circumstances might it be appropriate for these collection services to begin after this date?

Collection contracts

Sorting contracts

Materials Recovery Facility (MRF) infrastructure capacity

Cost burden

Reprocessing

End markets

Other (please specify)

Each authority's circumstances needs to be assessed separately.

Please provide the reason for your response and indicate how long local authorities require before they can collect all of these materials, following the date that funding is available from Extended Producer Responsibility.

We do not believe any of these circumstances should be a universally applicable reason for any local authority not to start services within the proposed timeframe. In any event, each local authority's circumstances will need to be carefully assessed individually, as it would be challenging to exemptions on specific circumstances.

Q9. Do you agree or disagree that food and drink cartons should be included in the plastic recyclable waste stream in regulations, to reduce contamination of fibres (paper and card)?

Agree – cartons should be included in the plastic recyclable waste stream

Disagree – cartons should be included the paper and card recyclable waste stream

Not sure / don't have an opinion / not applicable

Please provide the reason for your response and state if there are any unintended consequences that we should consider.

We agree with the inclusion of cartons in the plastic waste stream from the perspective of enabling it to be included within the existing provisions of the Environment Bill without the inclusion of further provisions that might add further delay to the Bill's implementation.

Food and drinks cartons should be reprocessed separately from other types of fibreboard as well as plastic bottles, and we understand that it is more straightforward to separate them from the plastic bottle stream, as opposed to the paper and fibreboard stream.

Q10. Assuming food and drink cartons are included by the date that Extended Producer Responsibility commences, what would be the financial impact on gate fees and processing costs from sending mixed material streams containing cartons into a Materials Recovery Facility?

No increase

0–9% increase

10–20% increase

21–100% increase

Not sure / don't have an opinion / not applicable

This is outside Valpak's expertise and will be better answered by other stakeholders.

Proposal 2 - Collection of plastic films from households

Q11. Do you agree or disagree that local authorities should adopt the collection of this material from all households, including flats, no later than 2026/27?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response.

Q12. Which of the following reasons might prevent plastic film collections being offered to all households by the end of the financial year 2026/27?

Collection contracts

Sorting contracts

Materials Recovery Facility (MRF) infrastructure capacity

Cost burden

Reprocessing

End markets

Other (please specify)

Each authority's circumstances to be assessed separately.

Please provide the reason for your response and provide evidence to support your answer.

Overall, we do not believe any of these circumstances would be a universally applicable reason for any local authority not to start services, but each local authority's circumstances will need to be carefully assessed individually, as it would be challenging to generalise on specific circumstances.

Whilst other stakeholders will be better placed to offer valuable insights in this area, we do hold concern that allowing some local authorities a protracted time period to implement plastic film collection may prolongs consumer confusion in respect of which local authorities collect film. Should Government press ahead with allowing some local authorities to adopt collections of film by no later than 2026/27, those local authorities or associated organisations should be required to provide consumers in those areas with clear guidance and communications that plastic films should not be disposed of within plastic recyclable waste stream.

Proposal 3 - Definition of the Food waste Stream

Q13. Do you agree or disagree that the above should be collected for recycling within the food waste stream?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response and specify which materials should be included or excluded in this definition.

Whilst we agree with the inclusion of tea bags within the definition of food waste, we assume that tea bags would not be considered as obligated packaging by the Packaging EPR Regulations. It would be expected that producers of tea bags will not be responsible for covering waste management costs associated with them.

Proposal 4 - Separate collection of food waste from households for recycling

Q14. Which parts of Proposal 4 do you agree or disagree with?

| | Agree | Disagree | Not sure / don't have an opinion / not applicable |
|--|-------|----------|---|
| Local authorities already collecting food waste separately must continue to collect this material for recycling at least weekly from the 2023/24 financial year | | | |
| Local authorities should have a separate food waste collection service (at least weekly) in place for all household properties including flats as quickly as contracts allow | | | |
| Local authorities without existing contracts in place that would be affected by introducing a separate food waste collection service should have a separate food waste collection service in place (at least weekly), for all households including flats, by the 2024/25 financial year at the latest | | | |
| Local authorities with long term existing mixed food/garden waste collection or disposal contracts in place should have a separate food waste collection service in place (at least weekly) for all household properties including flats as soon as soon as contracts allow, with an end date to meet this requirement between 2024/25 and 2030/31 | | | |
| Local authorities with long term residual waste disposal contracts affected by introducing a separate food waste collection service (e.g. some Energy from Waste or Mechanical Biological Treatment contracts) should introduce a separate food waste collection service (at least weekly) to all households including flats as soon as contracts allow, with an end date to meet this requirement to be set between 2024/25 and 2030/31 | | | |

Please provide any views on the end date for these obligations and any evidence on associated costs and benefits.

Other stakeholders will be better placed to offer valuable insights in this area.

Q15. Some local authorities may experience greater barriers to introducing a separate food waste collection service to all household properties, including flats, by the dates proposed above. For what reasons might it be appropriate for these collection services to begin after this date?

Collection contracts
Treatment contracts
Cost burden
Reprocessing
End markets
Other (please specify)

If you have disagreed with any of the proposed implementation dates above, please provide examples of circumstances where it would be appropriate for this collection service to begin after these proposed dates and any supporting evidence where possible.

Other stakeholders will be better placed to offer valuable insights in this area

Proposal 5 – Food Waste Caddy Liners

Q16. Do you agree or disagree with this proposal? Please provide any other comments on the use of caddy liners in separate food waste collections, including on any preferences for caddy liner material types.

Agree
Disagree
Not sure / don't have an opinion / not applicable

Proposal 6 – Biodegradable and Compostable Plastic Packaging

Q17. Do you have any comments on how the collection and disposal of compostable and biodegradable materials should be treated under recycling consistency reforms? For example, this could include examples of what should be provided in guidance on the collection and disposal of these materials.

We agree that biodegradable and compostable plastic packaging should be classed as not recyclable because they would otherwise contaminate conventional plastic waste recycling streams. However, there must be additional efforts undertaken atop classing them as not recyclable to help prevent the likelihood of these materials being disposed of within plastic recyclable waste stream and ensure the correct sorting and end-of-life treatment of them. There will need to be very clear labelling and consumer communications to instruct consumers to not place these materials in conventional recycling bins but instead place in food waste or dedicated bins provided (where applicable).

Q18. Do you agree or disagree that anaerobic digestion plants treating food waste should be required to include a composting phase in the treatment process?

Agree
Disagree

Not sure / don't have an opinion / not applicable

Please provide any evidence where possible and explain any advantages and disadvantages.

Other stakeholders will be better placed to offer valuable insights in this area

Proposal 7 – Definition of Garden Waste (Note: plant matter only, not soil)

Q19. Do you agree or disagree with the materials included in and excluded from this description of garden waste?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response and specify which materials should be included or excluded in this definition.

Proposals 8 and 9 – Increasing the Recycling of Garden Waste from Households

Q20. Given the costs, recycling benefits and carbon emissions reductions, do you agree or disagree that local authorities should be required to introduce a free minimum standard garden waste collection (240 litre containers, fortnightly collection frequency and throughout the growing season), if this is fully funded by Government, and if authorities remain free to charge for more frequent collections and/or additional capacity?

Agree

Disagree

Not sure / don't have an opinion / not applicable

Please provide any comments or evidence on the costs and benefits presented above.

Q21. How likely are the following options to support the above policy aims?

| | Very likely | Likely | Unlikely |
|---|-------------|--------|----------|
| Provide updated guidance on reasonable charges for garden waste | | | |
| Issue clear communications to non-participating households | | | |
| Support on increasing home composting (e.g. subsidised bin provision) | | | |

Q22. Do you have any further comments on the above options, or any other alternatives that could help to increase the recycling of garden waste and/or reduce the quantity of garden waste in the residual waste stream? Please provide supporting evidence where possible.

Proposal 10: Exemptions for the separate collection of two recyclable waste streams from households

Q23. Could the following recyclable waste streams be collected together from households, without significantly reducing the potential for those streams to be recycled?

| | Agree | Disagree | Not sure / don't have an opinion / not applicable |
|-------------------|-------|----------|---|
| Plastic and Metal | X | | |
| Glass and Metal | | | X |

If you have agreed with either of the above, please provide evidence to justify why any proposed exemption would be compatible with the general requirement for separate collection of each recyclable waste stream.

The co-mingling of recyclable materials, where appropriate, may help reduce system costs which producers will be responsible for cover through provision within forthcoming EPR regulations. We are aware from previous experience of operating a MRF that plastic and metal streams are relatively straightforward to separate, and that technology is already in widespread use to do this effectively. Other stakeholders will be better placed to provide more valuable insights on the feasibility of co-mingling glass and metal.

Q24. What, if any, other exemptions would you propose to the requirement to collect the recyclable waste in each waste stream separately, where it would not significantly reduce the potential for recycling or composting?

We would encourage Government to consider an exemption for certain housing types. For example, it would be challenging and perhaps unfeasible to provide separation facilities for some housing types such as high-rise flats where space is limited, and it is difficult to ensure proper separation by all residents using communal facilities. As a result, higher recyclable waste yields may be best delivered through allowing co-mingling in these circumstances where most appropriate.

Proposal 11 – Collection recyclable waste streams from households together

Q25. Do you have any views on the proposed definition for ‘technically practicable’?

Q26. Do you agree or disagree that the proposed examples cover areas where it may not be ‘technically practicable’ to deliver separate collection?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree with any of the above, please provide the reason for your response and indicate which example you are referring to.

Q27. What other examples of areas that are not 'technically practicable' should be considered in this proposal? Please be as specific as possible.

The feasibility of residents having sufficient space and facilities to separate and store recyclable material in the home (e.g. high-rise flats with limited space).

Q28. Do you agree or disagree that the proposed examples cover areas that may not be 'economically practicable' to deliver separate collection?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree with any of the above, please provide the reason for your response and indicate which example you are referring to

Q29. What other examples of 'economically practicable' should be considered in this proposal? Please be as specific as possible.

Q30. Do you have any views on what might constitute 'excessive costs' in terms of economic practicability?

We understand there could be trade-offs between higher collection costs and collected material quality in some situations. We suggest that further research is undertaken to help Government with creating suitable, more detailed guidance for local authorities on this subject.

Q31. Do you have any views on what should be considered 'significant,' in terms of cases where separate collection provides no significant environmental benefit over the collection of recyclable waste streams together?

We understand there could be trade-offs between higher collection costs and collected material quality in some situations. We suggest that further research is undertaken to help Government with creating suitable, more detailed guidance for local authorities on this subject.

Q32. Do you agree or disagree that the proposed examples for 'no significant environmental benefit' are appropriate?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree with any of the above, please provide the reason for your response and indicate which example you are referring to.

Q33. What other examples of 'no significant environmental benefit' should be included in this proposal? Please be as specific as possible.

There may instances where the co-mingled collection of recyclable materials yields to better resident participation and higher yields of recyclable material (e.g. from high rise flats) and this outweighs the disadvantages of lower material quality or higher reject tonnages.

Proposal 12 – Compliance and Enforcement

Q34. Do you agree or disagree that local authorities should only be required to submit a single written assessment for their service area?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response.

Q35. What other ways to reduce the burden on local authorities should we consider for the written assessment?

Q36. What factors should be taken into consideration including in the written assessment? For example, different housing stock in a service area, costs of breaking existing contractual arrangements and/or access to treatment facilities.

Q37. Do you agree or disagree that reference to standard default values and data, which could be used to support a written assessment, would be useful?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response.

Q38. Do you agree or disagree that a template for a written assessment would be useful to include in guidance?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response.

Proposal 13 – Minimum service standards for Household Recycling Collections

Q39. Do you agree or disagree with Proposal 13, particularly on the separation of fibres from other recyclable waste streams and the collection of plastic films?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response.

Proposal 14 – Non-Statutory Guidance

Q40. Which service areas or materials would be helpful to include in non-statutory guidance?

Proposal 15 - Reviewing the Environmental Permitting Regulations 2016

Q41. Do you have any comments on the recommendations from the review of the Part 2 of Schedule 9 of the Environmental Permitting Regulations?

Q42. If amendments are made to Part 2 of Schedule 9, do you agree or disagree that it is necessary to continue to retain requirements to sample non-packaging dry recyclable materials?

Agree

Disagree

Not sure / don't have an opinion / not applicable

Please provide the reason for your response where possible.

Proposal 16 – Recycling Credits

Q43. Do you agree or disagree that provision for exchange of recycling credits should not relate to packaging material subject to Extended Producer Responsibility payments?

Agree

Disagree

Not sure / don't have an opinion / not applicable

Please provide the reason for your response.

This detail is best left to be determined between Government and Local Authorities, providing that the total payment by producers under EPR is no greater than necessary net costs and is kept under control.

Q44. In relation to recycled waste streams not affected by Extended Producer Responsibility or which are not new burdens we are seeking views on two options:

Option 1: Should we retain requirements for Waste Disposal Authorities to make payment of recycling credits or another levy arrangement with Waste Collection Authorities in respect of non-packaging waste?

Agree

Disagree

Not sure/ Don't have an opinion

Option 2 Should we discontinue recycling credits and require all two-tier authorities to agree local arrangements?

Agree

Disagree

Not sure/ Don't have an opinion

Q45. Where local agreement cannot be arrived at what are your suggestions for resolving these? For example, should a binding formula be applied as currently and if so, please provide examples of what this could look like.

This detail is best left to be determined in discussion between Government and Local Authorities.

Proposal 17 - Non-Household Municipal Recycling Collections

Q46. Do you agree or disagree that waste collectors should be required to collect the following dry materials from all non-household premises for recycling, in 2023/24?

| | Agree – this material can be collected in this timeframe | Disagree – this material can't be collected in this timeframe | Not sure / don't have an opinion / not applicable |
|--|--|---|---|
| Aluminium foil | X | | |
| Aluminium food trays | X | | |
| Steel and aluminium aerosols | X | | |
| Aluminium tubes, e.g. tomato puree tubes | | | X |
| Metal jar lids | X | | |
| Food and drink cartons, e.g. TetraPak | X | | |

If you disagree with the inclusion of any of the materials above in the timeframe set out, please provide the reason for your response and indicate which dry recyclable material you are referring to.

Although we believe tubes which are principally metal (e.g. tomato puree tubes) are relatively straightforward to recycle, there are many other types of tubes which are metal-plastic laminates. Will believe these are much more complex to recycle and believe there are limited facilities to recycled them in the UK. As a result, we suggest further work is needed to determine the feasibility of this proposal.

We do however believe that there are likely to be sufficient facilities for recycling food and drink cartons, but further work may be needed to check the ability of MRFs to effectively sort cartons.

Q47. Some waste collectors may not be able to collect all the items in the dry recyclable waste streams from all non-household municipal premises in 2023/24. Under what circumstances might it be appropriate for these collection services to begin after this date?

Collection contracts

Sorting contracts

Materials Recovery Facility (MRF) infrastructure capacity

Cost burden

Reprocessing

End markets

Other (please specify)

The individual circumstances of each business will need to be considered.

Please provide the reason for your response and indicate how long waste collectors require before they can collect all these materials.

Businesses do of course have the option to switch collection providers to one that is able to deliver such collections, and therefore they should not be automatically exempt upon declaring their current circumstances prevent the collection of these materials for recycling to occur.

Proposal 18 - Collection of plastic films from non-household municipal premises

Q48. Do you agree or disagree that collections of plastic films could be introduced by the end of 2024/25 from non-household municipal premises?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response and any evidence as to why this would not be feasible.

Q49. Do you have any other comments on this proposal? For example, please specify any barriers that may prevent collectors delivering these services

Whilst other stakeholders will be better placed to offer valuable insights in this area, we do hold concern with the proposals to allow some businesses a protracted time period to implement plastic film collection, as this prolong confusion and potential jeopardise the quality of more conventional plastic waste separated for recycling due to film contamination.

Waste collectors should still be able to reject loads should they be excessively and repeatedly contaminated by non-designated materials. As this contamination would require collectors to run collected loads through further sorting, we believe the waste collector should be at liberty to charge the business(es) the waste is collected from for this additional process, as opposed to passing costs onto the wider extended producer responsibility system for non-household municipal waste.

Proposal 19 - On-site food waste treatment

Q50. Do you agree or disagree with the proposals for food waste that is not properly recycled or fully recovered on the site of production to be separately collected for recycling or recovery elsewhere?

Agree

Disagree

Not sure / don't have an opinion / not applicable

Q51. Do you have any other comments on the use of these technologies and the impact on costs to businesses and recycling performance?

Proposal 20 - Barriers to recycling for non-household municipal waste producers

Q52. What are the main barriers that businesses (and micro-firms in particular) face to recycle more?

| | Large Barrier | Some Barrier | Low/No Barrier |
|--------------------------------------|---------------|--------------|----------------|
| Communication | X | | |
| Financial | | X | |
| Space | X | | |
| Engagement | | X | |
| Drivers to segregate waste | | X | |
| Location | | | X |
| Enforcement | | | X |
| Variation in bin colours and signage | | X | |
| Contractual | | X | |
| Staff/Training | | X | |
| Other | | | |

If you have selected other above, please specify.

We consider high staff turnover to be a considerable barrier to successful segregation of waste for recycling.

Please provide any comments on how these barriers can be overcome.

A crucial aspect of extended producer responsibility is to provide communications on waste packaging recycling. This is proposed to extend to businesses as well as households which should mitigate these barriers.

There may also need to be consideration of sharing of communal recycling and disposal collections between businesses in close proximity to each other or between business and residential properties in close proximity to each other (e.g. flats above shops).

Proposal 21 – Special Measures for Micro-Businesses

Q53. Should micro-firms (including businesses, other organisations and non-domestic premises that employ fewer than 10 FTEs) be exempt from the requirement to present the five recyclable waste streams (paper & card, glass, metal, plastic, food waste) for recycling? Please select the option below that most closely represents your view and provide any evidence to support your comments.

Yes – all micro-firms should be exempt from the requirement – Option 1

No – but all micro-firms should be given two additional years to comply with the new requirements in the Environment Bill (i.e. compliant in 2025/26) – Option 2

No – all micro-firms should be required to present these waste streams for recycling, from the 'go live' date in 2023/24

Q54. Should any non-household municipal premises other than micro-sized firms be exempt from the requirement? Please provide evidence to support your comments.

We feel this exemption may be more salient and applicable to smaller premises, as opposed to businesses with a small number of employees. Small premises will face perhaps the largest barrier to separate waste for recycling, regardless of whether they are part of a national chain or an independent business. Such an exemption for a single premises part of a wider national chain should be consistent with the terms that would also apply to micro-sized businesses.

Proposal 21 and 22 – Cost Reducing Options

Q55. Which recyclable waste streams should be included under a potential zoning scheme?

For each option, please select either agree, disagree, or not sure / don't have an opinion / not applicable.

Dry recyclable waste streams (glass, metal, plastic, paper and card)

Food waste

Other items e.g. bulky office waste (please specify)

Q56. Which of the below options, if any, is your preferred option for zoning/collaborative procurement? Please select the option that most closely aligns with your preference

Encouraging two neighbouring businesses to share the same containers under contract

Encouraging businesses to use shared facilities on a site/estate

Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in)

Co-collection – the contractor for household services also deliver the non-household municipal services

Framework zoning – shortlist of suppliers licensed to offer services in the zone

Material specific zoning – one contractor delivers food, one for packaging, one for refuse collection services

Exclusive service zoning – one contractor delivers the core recycling and waste services for the zone

None of the above

Q57. Do you have any views on the roles of stakeholders (for example Defra, the Environment Agency, WRAP, local authorities, business improvement districts, businesses and other organisations and chambers of commerce) in implementing a potential zoning or franchising scheme?

For example, do you think there could be roles for one or more of these organisations in each of the following activities:

Procurement

Scheme design

Administration and day to day management

Enforcement

Business support

Development of tools and guidance

Delivery of communications campaigns

Any other activities (please specify)

If you think that there is a role for any other stakeholders, please specify.

Please provide explanations where possible to support your above response.

These bodies should be involved in developing guidance for businesses and setting up the overarching framework of the system. However, these tools should not be prescriptive in the course of action or contracts that individual businesses engage in, so that businesses retain an element of flexibility and choice within the system in order to attain the best value for money applicable to their individual circumstance.

Q58. Do you have any further views on how a potential waste collection franchising / zoning scheme could be implemented?

This is a major topic will require further discussion of the proposed options between Government and stakeholders ahead of designing the final approach.

Q59. Do you have any views on how Government can support non-household municipal waste producers to procure waste management services collaboratively? This could include working with other stakeholders.

There are a number of ways Government can support this:

- Setting common standards for both material collected and service delivery.
- Consider reducing or removing the unnecessary barriers between household and commercial collections for local authorities.

- Providing business with a short-list of suitable contractors who are able to offer better rates and services due to their collections coverage within the area.

Q60. Which type(s) of business support would be helpful? (Select any number of responses)

1:1 support

National /regional campaigns

National guidance and good practice case studies

Online business support tools (e.g. online calculators and good practice guidance)

Other (please specify)

Q61. Are there any barriers to setting up commercial waste bring sites, and do you find these sites useful?

Commercial businesses are not generally permitted to dispose of waste at HWRCs. It may be worth exploring the feasibility of allowing businesses to utilise HWRC facilities or combining the commercial waste site with the household waste bring site in attempt to benefit from economies of scale.

Proposal 23 and 24 – Exempting the separate collection of two waste streams from businesses

Q62. Could the following recyclable waste streams be collected together from non-household municipal premises, without significantly reducing the potential for those streams to be recycled?

| | Agree | Disagree | Not sure / don't have an opinion / not applicable |
|-------------------|-------|----------|---|
| Plastic and Metal | X | | |
| Glass and Metal | | | X |

If you have agreed with either of the above, please provide evidence to justify why any proposed exemption would be compatible with the general requirement for separate collection of each recyclable waste stream.

The co-mingling of recyclable materials where appropriate may help reduce systems costs which producers will be responsible for cover as a result of extended producer responsibility reforms. However, other stakeholders will be better placed to provide more valuable insights as to whether permitting the co-mingling of metal packaging would raise significant safety concerns for waste handlers.

Q63. What, if any, other exemptions would you propose to the requirement to collect the recyclable waste stream in each waste stream separately where it would not significantly reduce the potential for recycling or composting?

Exemption for certain premises types that may face particular challenges in facilitating the separation of recyclable waste. For example, the abilities of small businesses such as cafes to separate waste for recycling may vary considerably from other businesses of similar size, such as a hairdresser or estate agent. As a result, any exempting provisions for

businesses may need to consider broader factors than simply floor size or numbers of FTE employees.

Q64. Do you have any views on the proposed definition for 'technically practicable'?

Waste collectors will need to demonstrate that their local circumstances mean that it is not practicable to have separate collection. Examples of this could include, but are not limited to:

- Type of premises and accessibility
- Rurality and geography of premises
- Availability of containers
- Storage of containers at premises
- Storage in existing waste transfer infrastructure

The feasibility of businesses to have sufficient space and facilities to separate and store recyclable material within their premises (e.g. high-street stores with limited space).

Q65. Do you agree or disagree that the proposed examples cover areas where it may not be 'technically practicable' to deliver separate collection?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you have disagreed with any of the above, please say why and indicate which example you are referring to.

Q66. What other examples of areas that are not 'technically practicable' should be considered in this proposal? Please be as specific as possible.

In addition to the examples mentioned, exemptions for certain premise types that may face particular challenges in enabling the separation recyclable waste must be considered. For example, the abilities of small businesses such as cafes to separate waste for recycling may vary considerably from other businesses of similar size, such as a hairdresser or estate agent. As a result, any exempting provisions for businesses may need to consider broader factors than simply floor size or numbers of FTE employees.

Q67. Do you agree or disagree that the proposed examples (type of/ accessibility to premises) cover areas that may not be 'economically practicable' to deliver separate collection are appropriate?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you have disagreed with any of the above, please say why and indicate which example you are referring to.

Q68. What other examples of 'economically practicable' should be considered in this proposal? Please be as specific as possible.

Exemptions for certain premise types that may face particular challenges in enabling the separation recyclable waste must be considered. For example, the abilities of small businesses such as cafes to separate waste for recycling may vary considerably from other businesses of similar size, such as a hairdresser or estate agent. As a result, any exempting

provision for businesses may need to consider broader factors than simply floor size or numbers of FTE employees.

Q69. Do you have any views on what might constitute 'excessive costs' in terms of economic practicability?

We understand there could be trade-offs between higher collection costs and collected material quality in some situations. We suggest that further research is undertaken to help Government with suitable, more detailed guidance for local authorities on this subject.

Q70. Do you have any views on what should be considered 'significant,' in terms of cases where separate collection provides no significant environmental benefit over the collection of recyclable waste streams together?

The Government should discuss with other industry stakeholders within the waste management sector as to what they consider to be an unjustifiable environmental impact when assessing whether to alter their own operations. We understand there could be trade-offs between higher collection costs and collected material quality and quantity in some situations, for example, smaller premises may be able to achieve better participation in recycling by staff if they were not required to separate all materials to the same degree. We suggest that further research is undertaken to help Government with suitable, more detailed guidance for local authorities on this subject.

Q71. Do you agree or disagree that the proposed examples for 'no significant environmental benefit' are appropriate?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you have disagreed with any of the above, please say why and indicate which example you are referring to.

Q72. What other examples of 'no significant environmental benefit' should be included in this proposal? Please be as specific as possible.

There may instances where the co-mingled collection of recyclable materials results in better business participation and higher yields of recyclable material arising (e.g. from smaller premises) and this outweighs the disadvantages of lower material quality or higher rejects.

Proposal 25 – Compliance and Enforcement

Q73. What ways to reduce the burden on waste collectors and producers should we consider for the written assessment?

The deliverance of guidance, case studies and communications for stakeholders will likely be worthwhile undertakings.

Q74. We are proposing to include factors in the written assessment which take account of the different collection requirements, for example, different premises within a service area. What other factors should we consider including in the written assessment?

Exemptions for certain premise types that may face particular challenges in enabling the separation recyclable waste must be considered. For example, the abilities of small businesses such as cafes to separate waste for recycling may vary considerably from other businesses of similar size, such as a hairdresser or estate agent. As a result, any exempting provisions for businesses may need to consider broader factors than simply floor size or numbers of FTE employees. These exemptions should be developed in further discussion with concerned stakeholders.

Q75. Would reference to standard default values and data, that could be used to support a written assessment, be useful?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response.

Q76. Do you agree or disagree that a template for a written assessment would be useful to include in guidance?

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response.

Q77. Do you agree or disagree that the proposed approach to written assessments and non-household municipal collections will deliver the overall objectives of encouraging greater separation and assessing where the three exceptions (technical and economical practicability and environmental benefit) apply?

Agree

Disagree

Not sure / don't have an opinion / not applicable

Proposal 26 – Impact Assessment of Proposals

Q78. Do you have any comments and/or evidence on familiarisation costs (e.g. time of FTE(s) spent on understanding and implementing new requirements) and ongoing costs (e.g. sorting costs) to households and businesses?

Valpak are yet to propose an answer to this question.

Note: familiarisation and sorting costs are not estimated within the Consistent Collections Impact Assessment.

Q79. Do you have any comments on our impact assessment assumptions and identified impacts (including both monetised and unmonetised)?

Valpak are yet to propose an answer to this question.