Consistent Collections (England)

Summary of Updated Proposals

FOR VALPAK MEMBERS ONLY

Background

Defra has published its updated proposals for standardising the recycling collections from all household kerbsides as well as the materials that businesses must segregate for collection for recycling in England. The initiative is commonly known as Consistent Collections. It is hoped that the initiative will improve the quantity and quality of separately collected waste throughout England and increase municipal waste recycling rates.

The updated proposals, which build upon those first published in Spring 2019, have been announced as part of a **12-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**.

Valpak will be responding to Defra's updated proposals on behalf of members. Our **draft response to the updated proposals will be distributed to members for feedback prior to its submission.**

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

Why is action being taken?

There are currently **no standardised method** for collecting household recyclable waste in the UK, meaning local kerbside collections services vary, in some cases considerably. Normally dry materials would be collected in one of following ways:

- All dry materials collected separately, often in 3 containers: **multi-stream**.
- Paper/card collected separately from other dry materials: **two/twin-stream**.
- All dry materials collected together: **co-mingled** stream.

In recent years, **municipal recycling rates have stalled** at around 44-45% for households and 49% for businesses. While many local authorities continue to make improvements, **some local authorities do not collect the full range of materials that can be recycled**. Moreover, many do not collect food waste separately, resulting in much of it going to landfill, where it pollutes the local environment and releases harmful greenhouse gases.

Currently, there are very **few drivers to encourage local authorities to expand recycling** services or for businesses to invest in recycling services. Moreover, **householders are increasingly confused** over what can and cannot be recycled in their area due to the 'postcode lottery' of waste collections services.

It is hoped in combination with reforms to the Packaging Waste Regulations to implement Extended Producer Responsibility (EPR) and the introduction of a Deposit & Return Scheme (DRS) for single-use drinks containers, Consistent Collections can aid progress towards targets set by Government in the Resources and Waste Strategy, which include to:

- Work towards zero food waste to landfill by 2030
- Recycle 65% of municipal waste by 2035
- Work towards zero avoidable waste by 2050

Connection with EPR

EPR will implement the **mandatory labelling** of packaging items as recyclable or not recyclable as well as the delivery of **consumer communications** aimed at increasing the quality of household and business packaging waste. These changes will operate in tandem with Consistent Collections to help individuals properly dispose of packaging waste and maximise its value to secondary resource markets.

Consistent Collections is inextricably intertwined with EPR, as the **full net cost recovery** principle proposed to be implemented as part of EPR reforms will require **packaging producers** to **cover the net costs of managing all waste packaging collected for recycling by local authorities** from households, as well as possibly extending to the costs of managing waste packaging collected from businesses by waste management companies.

Producers contributions will not extend to cover the collection of non-packaging materials in these proposals, such as food waste, garden waste or non-packaging recyclables such as newspapers.

Household Collections

Core Set of Dry Recyclables

Consistent Collections will require all local authorities in England to collect the same core set of dry recyclable materials from households. Within their updated proposals for Consistent Collections Defra propose that **from October 2023 and by no later than April 2024, the 'core set'** of recyclable materials that must be collected from all householder kerbsides, including flats, will include:

- **Glass** bottles and containers (incl. drinks bottles, condiment bottles, jars) of any colour. Not drinking glasses or cookware.

- **Paper and card** (incl. newspaper, cardboard packaging, writing paper). Not disposable paper cups.
- **Plastic pots, tubs, trays and bottles** (incl. clear drinks containers, HDPE containers, detergent, shampoo and cleaning products).
- **Metal** packaging (steel and aluminium tins, cans).

Through the proposed provisions of EPR, local authorities who do not yet collect this core set of recyclable materials will receive funding across late 2023 and early 2024 to increase the capabilities of their household recycling collections. This will mean that all local authorities in England can collect this core set of recyclable materials for recycling ahead of the full implementation of packaging EPR from April 2024. The Government estimate that **obligated producers of household packaging will be required to collectively contribute £250-300 million across mid-2023** to fund these payments to local authorities in late 2023. Individual producer contributions will be based on the amount of household packaging placed onto the market in 2022.

Method of Collection

The Government is particularly keen on seeking views on:

- Recommending that paper and card are kept separate from all other recyclable waste streams in a twin-stream manner.
- Whether a multi-stream system, featuring a co-mingled stream of either plastic and metal or glass and metal should be permitted.

Whilst it is Government's view that recyclable waste from multi-stream collections is of higher quality and fetches higher prices on secondary markets than material from co-mingled systems, they cede that where it is not technically, economically or environmental practical (TEEP) to separately collect these recyclable materials, provisions may be put in place to enable two or more **recyclable waste streams to be collected together**.

It is the Government's view that that if a twin-stream collection approach is not TEEP, a co-mingled collection service should only be considered as a last resort. In any event, **minimum service standards and guidance on best practices will be provided** to waste collectors.

Additional Materials

Defra also state an **intention to include a number of additional materials** within the dry recyclable waste stream:

- Aluminium **foil, foil food trays and metal aerosols cans** (incl. other packaging items)
- Metal jars and metal bottle **lids and tubes**
- Food and drink **cartons** (e.g. Tetra Pak)
- Plastic **films and flexible packaging** (any post-consumer material arising in household or household-like business waste, such as bread bags, carrier bags and bubble wrap). Does not include biodegradable or compostable plastics.

Food and drink **cartons will be classed as plastic** recyclable waste by the final Regulations. This is because Government is mindful of the likelihood of these composite materials to disrupt recycling processes were they to be collected and recycled alongside other fibre-based packaging.

Due to the complexities associated with the collection and recycling of plastic films, the Government proposes that the **collection of plastic films from households will be phased in**. Local authorities that already have film collections in place will be required to comply with the Consistent Collection regulations by the packaging EPR start date (2023), with those local authorities who do not instead being required to adopt collections of films by **no later than the end of the 2026/27 financial year**.

During this transition period to 2026/27, the Government intends for **retailer-led front of store collections of plastic films and clear packaging labelling** to instruct consumers to take waste film to their front of store recycling point to support the increased national effort to increase plastic film packaging.

Food and Garden Waste

Included in the Environment Bill is a requirement on Waste Collection Authorities to provide a **separate food waste collection to households (including flats) at least once a week**, from both other household waste and other dry recyclable waste. Food waste includes tea bags and coffee grounds. Leeway will be provided to local authorities that find this more challenging, though **all local authorities will be required to have arrangements in place for food waste collection by the 2024/25 financial year**.

Garden waste (plant matter only, not soil) is also included in the Environment Bill as a recyclable waste streams to be collected from households in England for recycling looking ahead. The Government is asking for views on whether local authorities should be required to **at least provide a free fortnightly garden waste collection** during the growing season.

It is the Government's expectation that whilst many local authorities already collect garden waste, others will be able to easily make the transition **by the 2023/24 financial year**.

The Government does acknowledge that it will be necessary in some circumstances to allow the collection of **combined food waste with garden waste** at kerbside. As a result, in cases where it will not be technically, economically or environmentally practicable to collect these waste streams separately, mingling will be allowed, though food waste must continue to be collected weekly all-year round.

Residual Waste ('black bag' waste) & Other Proposals

Alongside mandating weekly separate food waste collections, the Government is seeking views on recommending a **minimum service standard of alternate weekly collection for residual waste**. Producers of packaging will be required through the provisions of

packaging EPR to fund the costs associated with the management of packaging waste arising within this residual stream.

Bin colour standardisation is not proposed at this time, though Government is keen to encourage local authorities to work together to coordinate bin colours to reduce confusion.

Lastly, the Government will work with WRAP to produce **non-statutory guidance on good practice concerning the collection of other waste streams** not mentioned in the Environment Bill (for example, sanitary products and hazardous waste), and may also include guidance on areas such as bring sites and litter collection.

Business Collections

The Environment Bill requires five recyclable waste streams to be collected separately from non-domestic premises producing municipal waste. These waste streams are glass, metal, plastic, paper / card and food waste.

Defra views the non-household municipal waste sector as a particular area for action, given the recycling rate of waste arising from the some 2 million entities in this area was only estimated to be 30-40% in 2019. Defra estimate this could rise to around 74% "with the right measures".

Through the proposed provisions of packaging EPR, **producers of household-like and commercial & industrial (C&I) packaging will be obligated to cover the net costs of the collection for recycling of the core set of recyclable materials from businesses producing household-like and C&I packaging waste from April 2024**. Individual contributions will be based on the amount of household-like and C&I packaging placed onto the market in 2023.

Updated 2021 Proposals

Defra also propose that the dry recyclable waste streams collected from non-household municipal premises should include **the same materials as the proposals for households, applying from the financial year 2023/24.** These include:

- **Glass:** Bottles and containers – including drinks bottles, condiment bottles, jars
- **Paper and card**: Including newspaper, cardboard packaging, writing paper
- **Metal**: Steel and aluminium tins, cans (incl. aerosol canisters), foil, foil food trays, metal lids and aluminium tubes (e.g. tomato puree tubes).
- **Plastic:** Bottles (incl. clear drinks containers, HDPE, detergent, shampoo and cleaning products), pots tubs and trays, food and drink cartons and plastic films

These waste streams are to be collected separately from each other unless it is not technically or economically practicable to do so, there is no significant environmental benefit in doing so or if an exemption to this requirement for some premises is set out in legislation.

Government is **seeking views on whether either plastic and metal or glass and metal co-mingling should be permitted** for non-household municipal waste producers, in a similar fashion to proposals for household waste collections.

The Government is also seeking views on implementing a **delay to the introduction of these requirements for micro-businesses with fewer than 10 FTE employees to the 2025/26 financial year**, some two years after the initial go-live date applicable to other businesses. Whilst views are sought on the potential of an exemption, the Government is mindful that these businesses are estimated to constitute ~85% of all waste producers and 25% of all waste tonnages produced by the non-household sector.

Specific measures for Food and Film

Food waste is proposed to be collected separately from the other recyclable waste streams and residual waste. The Government intends to separately consult industry on also making businesses of an appropriate size in England report surplus food and waste data.

Due to expected complexities in collecting film or food waste, the Government is seeking views on whether the **requirement for plastic film or food waste being collected for recycling from the non-household municipal sector from 2024/25** needs to be delayed.

Combining Household and Business Collections

The Government is considering the **value of combing collections from micro-sized businesses situated within residential areas** with household collections, to pursue economies of scale and cost savings. The sharing of bins by businesses in close proximity to each other is also being considered.

Funding Consistent Collections

In providing cost impacts of their updated proposals, Defra outline 4 options – 2 for household (HH) collections and 2 for business (B = non-household municipal):

1. HH 1: Weekly, multi-stream dry recyclables collection for low-rise properties. Dry mixed recyclables (DMR) and food waste from flats. Fortnightly residual collections. Separate weekly food waste. Free fortnightly garden waste.
2. HH 2: Collection of DMR from low-rise properties at lowest cost to local authorities. DMR and food waste from flats. Fortnightly residual collections. Separate weekly food waste. Free fortnightly garden waste.
3. B 1: Separate residual, DMR, Glass and Food waste collections. Micro-businesses exempt.
4. B 2: Separate residual, DMR, Glass and Food waste collections. Micro-businesses provided additional two years to segregate waste.

	B1	B 2
HH1	Scenario (S) 1	Scenario (S) 2
HH2	Scenario (S) 3	Scenario (S) 4

	S1	S2	S3	S4
Municipal Recycling Rate by 2035	+20%	+24.2%	+20.5%	+64.7%
Local Authority Net Costs	£1,220m	£1,220m	£931m	£931m
Net Present Value (2023-35)	£2,746m	£491m	£3,067m	£809m