

Consultation on consistency in household and business recycling collections in England

About you

1. What is your name?

Ian Finch

2. What is your email address? ian.finch@sevenoaks.gov.uk

This is optional, but if you enter your email address then you will be able to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.

3. Which best describes you?

Please tick only one option. If multiple categories apply to you please choose the one which **best describes you** and which you are representing in your response. (Required)

- Local Authority**
- Waste management company
- Business representative organisation/trade body
- Product designer
- Manufacturer
- Distributor
- Retailer
- Reprocessor
- Community group
- Charity or social enterprise
- Independent consultancy
- Academic or researcher
- Individual
- Other (please provide details ...)

4. If you are responding on behalf of an organisation, what is its name?

Sevenoaks District Council –Waste Collection Authority
Member Council of the Kent Resource Partnership

5. Would you like your response to be confidential?

Yes / **No**

If you answered 'Yes' above, please give your reason:

Part 1 Measures to improve the quantity and quality of household recycling collected by local authorities

Consultation questions on dry recycling

Proposal 1

Q5 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 materials
- Disagree – local authorities should not be required, to collect a core set of materials**
- Not sure/don't have an opinion

No objection to a core set of materials being identified for recycling be that through kerbside or bring bank collection or household waste recycling centres.

Q6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

- Agree
- Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials**

No objection to a core set of materials being identified for recycling but allowable collection methods should include bring bank collection or household waste recycling centres and not just kerbside only.

Q7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

Some challenges associated with recycling at flats are noted below: -

- **Insufficient storage space for citizens;**
- **Insufficient bin storage space at flats/HMOs;**
- **Transient population;**
- **Language barrier (especially for those citizens who don't speak English as their first language);**
- **Lack of ownership (e.g. a minority of citizens' incorrect behaviour could result in contamination and therefore demotivate others to demonstrate the right type of behaviour); and**
- **Access roads for waste collection vehicles.**

Over the last few years, guidance from WRAP has supported Local Authorities. Recent research from Resource London / LWARB has been taken forward to look at how to support citizens living in flats to recycle well. Full report outlined below – <https://resourcelondon.org/wp-content/uploads/2019/02/Recycling-in-reality-report.pdf>

Q8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

We do not consider the habitual monitoring and the application of fines appropriate. While measures need to be considered to support those citizens who don't care about recycling, and who are easily able to 'mask' their behaviours when using communal bins, a measured approach is recommended.

Q9 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.

See additional text under Q5. There is also a need for appropriate waste infrastructure in the local area to be able to bulk and reprocess the materials within a reasonable distance and cost effectively.

Proposal 2

Q10 Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	<input type="checkbox"/> NO but we support separate collection from bring bank sites.	<input type="checkbox"/>	<input type="checkbox"/>
Paper and card	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bottles	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>
Plastic pots tubs and trays	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>
Steel and aluminium tins and cans	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>

Q11 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?

	This should be included in the core set from the start of Consistency	This should be included in the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bags and film	<input type="checkbox"/>	<input type="checkbox"/> YES (linked to delivery of UK	<input type="checkbox"/>	<input type="checkbox"/>

		Plastics Pact)		
Other materials (please specify)		Black Plastics	Dry cell batteries – not practical or economical	

Q12 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. **The initial core set of materials needs to be deliverable by councils whilst ensuring recycling rates increase robustly. For most materials (e.g. paper, metals and plastic bottles) the issue is increasing the capture of these items. Please refer to statements under Q10 and Q11 relating to mixed dry recycling. For plastic pots, tubs and trays these are recommended to be included in the core set from the outset as 76% of councils collect these, and there are only ‘local issues’ (e.g. a pre-existing contract with a waste management company) that needs to be challenged and overcome. For plastic films the situation is more complex. It is recommended the UK Plastics Pact (and the Ceflex project) work hard to enable solutions for collections and that these be implemented nationally as soon as confidence in the system allows.**

Any collection of mixed dry recyclables must be supported by waste infrastructure e.g. MRF specifications can vary to only process either a twin-stream or co-mingled and this must be consistent across the country. An opportunity for industry investment into infrastructure could be realised with consistency of dry recyclates across the country.

Q13 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?

We have noted black plastics could be phased in over time - we recognise technology developments have/are being made to recycle black plastics but in the meantime, may be best to not be included with the core set until all across the supply chain are in agreement – this would lead to less confusion for citizens.

We have noted plastics bags and film could be phased in as part of the core set. This could be one of the key areas of work for the UK Plastics Pact.

Kerbside collection of dry cell batteries is not required it being impractical and uneconomical – See Q11.

Q14 Do you have any other comments to make about Proposal 2?

We encourage investment in local reprocessing infrastructure with the aspirations of the Circular Economy Package, as also noted in our answer to Q9.

Proposal 3

Q15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- Yes
- No
- Not sure/don't have an opinion

Q16 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 (please specify which conditions you believe should be added ...)~~
- No – some/all should be removed (if some please specify below)
- No – some should be added and some should be removed (please specify which ...)
- Not sure/don't have an opinion

Q17 Do you have any other comments to make about Proposal 3?

With regards to Q15, this role could be fulfilled by the single not-for-profit body overseeing the transformed PRN system (Model 2 in the EPR consultation). This enables speedier consideration of issues, and implementation, than if the core set is regularly reviewed by the Government. However, the single body could work within a framework defined by the four nations and with their involvement. In all scenarios it should not be necessary for any updates to the core set of materials to need legislation. The proposed Environment Bill in 2019 should specify the conditions under which the core set can be reviewed and implemented.

Consultation questions on separate food waste collection

Proposal 4

Q18 Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	<input type="checkbox"/>	<input type="checkbox"/> YES – but if obliged to provide should be weekly.	<input type="checkbox"/>
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	<input type="checkbox"/> *YES	<input type="checkbox"/>	<input type="checkbox"/>
(iii) services to be changed only as and when contracts allow	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>

(iv) providing free caddy liners to householders for food waste collections	<input type="checkbox"/> *YES	<input type="checkbox"/>	<input type="checkbox"/>
---	-------------------------------	--------------------------	--------------------------

***As long as funding is available from Government, as outlined with the consultation.**

Q19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

- Yes – the lack of space within flats could present a practical issue when providing a separate food waste collections. Small terraced houses with no storage could also be an issue as there would be a lack of space.**
- No
- Not sure/don't have an opinion

Q20 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?

If a separate weekly food waste collection were to be imposed 100% funding by government in perpetuity would be needed.

We welcome government's statement on pages 27/28;

'Given the additional costs involved in separate food waste collection the government will ensure that local authorities are resourced to meet new costs arising from this policy including upfront transition costs and ongoing operational costs'

We would be keen to understand how this would work in practice, especially with ongoing operational costs including waste disposal infrastructure required to deal with food recycling collections e.g. waste transfer station storage on site and then being hauled to a reasonably located Anaerobic Digestion plant.

Proposal 5

Q21 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
- Specific financial support (e.g. set up and ongoing costs, including compensatory payments to councils who have committed investment to food recycling services)
- Procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers)**
- Communications support, (e.g. free collateral that can be adapted and used locally)**
- Technical support, (e.g. free advice from a consultant about round re-profiling)**
- Other – we advocate a partnership approach involving the whole packaging/food value chain to support local authorities. Additionally it is imperative councils' Recycling & Waste Departments end-up with more financial resources as a result of the set of Defra consultations. 100% funding by government in perpetuity would be needed. To that end, we are clear that PRN funds to local authorities must be ring-fenced to the Recycling & Waste Departments AND that those departments existing funding from Council Tax and any other sources is also protected.**

- Other – as previously mentioned, support towards the appropriate waste infrastructure required across the country e.g. Anaerobic Digestion plants.

Q22 Do you have any other comments to make about Proposal 5?
Refer to Q20.

Proposal 6

Q23 What are your views on this proposal?

For citizens to recycle and long-term behavioural change to be maintained, there must be reassurance that the material they are recycling is genuinely recycled. Negative media stories (whether perceived fake or real) can create long-term damage to citizens recycling behaviours. If media reported that the recycling materials citizens had taken time and effort to segregate was being combined, it not only potentially effects the citizens motivation to recycle this waste stream but others too.

Consultation questions on collecting garden waste

Proposal 7

Q24 Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) a free garden waste collection for all households with gardens	<input type="checkbox"/>	<input checked="" type="checkbox"/> DISAGREE	<input type="checkbox"/>
(ii) A capacity to 240l (bin or other container eg sack)	<input type="checkbox"/>	<input checked="" type="checkbox"/> DISAGREE	<input type="checkbox"/>
(iii) A fortnightly collection frequency (available at least through the growing season)	<input checked="" type="checkbox"/> AGREE	<input type="checkbox"/>	<input type="checkbox"/>
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	<input type="checkbox"/>	<input checked="" type="checkbox"/> DISAGREE	<input type="checkbox"/>
(v) this new requirement to start from 2023 (subject to funding and waste contracts)	<input type="checkbox"/>	<input checked="" type="checkbox"/> DISAGREE	<input type="checkbox"/>

Q25 Do you have any other comments to make about Proposal 7?

Part 1 above: We support that councils should retain their ability to charge a fee to citizens for collections of green garden waste (separately from food waste) from homes.

Part 2 above: We support that citizens should be able to purchase the size of bin that matches their needs (e.g. a very large garden may need a bigger bin than 240 litres or multiple bins). Alternatively, if a Council wishes to offer a smaller bin of 140 litres or compostable paper sacks as part of its customer offer, then that should be allowed.

Part 3 above: Fortnightly collection of garden waste throughout the year. Collection for only part of the year is confusing and may result in irresponsible disposal of waste.

Part 4 above: We support that councils should continue to be permitted to charge citizens for additional collection services, not just those that are in addition to the proposal for a minimum capacity requirement.

Part 5 above: Allowing councils to continue with existing collection and charging arrangements for separate green garden waste collections means there is no need to wait until 2023 to implement a revised scheme as proposed.

This policy could also demotivate citizens from composting at home, increase carbon emissions and traffic congestion.

Consultation questions on separate collection to improve quality

Proposal 8

Q26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

- Yes
- No – Sevenoaks District Council’s mixed dry recyclable materials collection already delivers quality dry materials for recycling at value for money to the local taxpayer, recognising that we can achieve even more working with and improving communication with our residents.**
- Not sure/no opinion/not applicable

Q27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.

As outlined within the consultation document (pg.35), the following circumstances may prevent separate collection –

- **Collecting certain types of materials together does not affect their potential to undergo reuse, recycling or recovery operations and results in output from those operations which is of comparable quality to that from separate collection;**
- **Separate collection does not deliver the best environmental outcome;**
- **Separate collection is not technically feasible taking into account good practice in waste collection;**
- **Separate collection would entail disproportionate cost, taking into account costs of adverse environmental and health impacts of mixed waste collection and treatment, as well as potential for efficiencies from separate collection and revenues from secondary material sales and polluter pays principles.**

- Q28 Do you have any other comments to make about Proposal 8? **Sevenoaks District Council understands the ambition but waste collections could be better achieved with less cost by remaining faithful to the 'localist agenda' and without threatening the service Sevenoaks District Council provides to those it exists to serve.**

Consultation questions on bin colour standardisation

Proposal 9

- Q29 Do you agree or disagree with this proposal?

- Agree – bin colours **should** be standardised for all waste streams
- Agree in part – bin colours should be standardised for some waste streams but not all (specify which ...)
- Disagree – bin colours need not be standardised for any waste streams**
- Not sure/no opinion/not applicable

We agree that bin labels could be standardised using the Recycle Now iconography and colours. If it is also possible to standardise bin colours then that is desirable, though we would not want a situation where existing bins across the country are rendered 'useless' overnight. We'd also add that it would be unfortunate if the principal aim of this consultation, namely consistency of recyclables, is undermined by a far less serious issue of the colour of bins. The recyclables prize is far more important at this time, and we recommend focusing attention on achieving that as a priority.

- Q30 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. Though it is more about the replacement of 'bin fleets' rather than waste contracts, though the two are sometimes synchronous (i.e. bins may last 10 to 15 years or longer whereas some waste collection contracts last for 10 years or shorter).**
- Phased approach 2 – as and when old/unserviceable bins are replaced – we struggle to see how a phased approach would work in a council's area. Presumably the bins would change colour on a house-by-house basis over a long time, which is a nightmare for the citizens to know which bin to put out that week, and also for the waste collector who will need to open bins of different colours at each household to see what is inside, which substantially delays the service and risks major contamination of recyclates. This could also significantly make good quality bins redundant (and therefore generate plastic waste), which would be contrary to the waste hierarchy. The costs of transitions would also be expensive.**
- Other ways please specify...

- Q31 Do you have any other comments to make about Proposal 9? **There are alternatives to bins, for example sacks.**

Consultation questions on service standards

Proposal 10

Q32 Do you agree or disagree with the proposal to publish statutory guidance?

- Agree – government should publish statutory guidance.
- Disagree – government should not publish statutory guidance**
- Not sure/no opinion/not applicable

Q33 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
- Disagree – it should be more often.
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable**

Q34 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?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable**

Q35 Do you have any other comments to make about Proposal 10?

Concerning Q32, Guidance by its nature is advisory but statutory 'guidance' implies legislative requirement not guidance or advice on best practice.

Concerning Q33, Since we would not support statutory guidance this question is not applicable.

Concerning Q34, Since we would not support statutory guidance this question is not applicable.

Consultation questions on communicating about recycling

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.

Q36 Do you have any comments to make about Proposal 11? **We support it. Labelling of packaging is far more important than the colour of bins.**

Q37 What information do householders and members of the public need to help them recycle better?

1). Awareness of core set of materials for recycling, and collections days/times.

2). Labelling on packaging that provides a crystal clear choice of which bin that item goes into at the point of disposal – the recycling bin, or the waste bin. Eradicate the ‘Check locally’ option.

3). Community expectations of how citizens should use their recycling and waste services.

4). Clear, simple information on how to recycle items on a weekly collection basis. Clear information on how to recycle items when on-the-go.

Proposal 12

Q38 Do you agree or disagree with this proposal?

- Strongly Agree – government should work with local authorities and other stakeholders on this**
- Disagree – government **should not** work with local authorities and other stakeholders on this
- Not sure/no opinion/not applicable

Q39 Do you have any other comments to make about Proposal 12?

We believe it should be mandatory for information on ‘end destinations of recyclates (EDR)’ to be produced for citizens to see for themselves what happens to their recyclates. In 2012, the KRP were founding signatories to the Resource Association’s EDR Charter. Since then, the KRP has published its ‘Materials End Destinations Publications’ on an annual basis. These publications can be found here –

<https://www.kent.gov.uk/about-the-council/partnerships/kent-resource-partnership/governance-documents>

We encourage other councils and waste companies to sign-up to the EDR Charter too. Any public communications regarding end destinations should be relatable and digestible in a simple and engaging format.

Consultation questions on end markets

Proposal 13

Q40 Please use this space to briefly explain any comments you have on the issues discussed in this section.

We believe it is in the national interest for the four nations to have National Plans to decrease UK reliance on foreign countries to process the UK’s recyclates and waste. To that end, we support the single not-for-profit body proposed in Model 2 of the EPR consultation having the responsibility to consider and make recommendations on domestic infrastructure that supports the ambitions of the four nations.

Consultation questions on non-binding performance indicators

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.

Q41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

- Agree**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q42 Do you agree or disagree that the proposed indicators are appropriate?

- Agree**
- Disagree (please expand ...)
- Not sure/no opinion/not applicable

Q43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

We support the proposed measures but wish to go further. Whilst this section focuses on local government only, we believe that all the data & performance systems relating to the flows of packaging need to align. This includes objectives, definitions and targets of (for example) Waste Data Flow, Fly Capture, the National Packaging Waste Database, and any new systems arising out of implementing packaging EPR proposals, and a potential GB or UK deposit return scheme. We suggest that the single not-for-profit body in Model 2 of the EPR consultation could have a major role to play in overseeing that all the data systems work harmoniously and efficiently together.

Consultation questions on alternatives to weight-based metrics

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.

Q44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

- Agree – this has been identified as part of the KRP’s recently refreshed Kent Joint Municipal Waste Management Strategy (KJMWMS – web link [here](#) for**

information)

- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q45 Do you agree that these alternatives should sit alongside current weight-based metrics

- Agree**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

Another environmental metric could be the amount of CO2/methane avoided due to other disposal alternatives, rather than landfill. The KRP have made great strides with this. In 2007/08, the 13 Kent councils sent 53% to landfill – 2017/18 figures now show as little as 1% ends in landfill.

Consultation questions on joint working

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.

Q47 Could greater partnership working between authorities lead to improved **waste management and higher levels of recycling?**

- Strongly Agree**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q48 What are the key barriers to greater partnership working?

Page 49 of the consultation document outlines a number of possible barriers for councils when taking forward joint working. For over 10 years, the Kent Resource Partnership has built a track record partnership working. See KRP response

Q49 How might government help overcome these barriers?

Q50 Do you have any other comments to make about Proposal 16?

We agree that one of the barriers is proximity and access to waste infrastructure and as such this lack of infrastructure could be addressed by Government. This could be in the form of capital funding in the same way that it funds Highway Authorities to finance improvements and maintenance of the highways network. This could be seen as national infrastructure serving an essential part of the economy.

Part 2 Measures to improve recycling by businesses and other organisations that produce municipal waste

Consultation questions on measures to increase recycling from business and other organisations that produce municipal waste

Proposal 17

Q51 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
- Disagree (why ...?) Businesses already have a responsibility to recycle. Sevenoaks District Council as a waste collection authority collects commercial waste from local businesses and organisations. Enforced separation of dry recyclable materials may create collection difficulties, increasing costs for businesses and discouraging smaller businesses to arrange commercial waste collections. Costs of investigation and prosecution of non-compliant businesses will fall on the local authority with little chance of full cost recovery through the courts.**
- Not sure/no opinion/not applicable

Q52 Which of the 3 options do you favour?

- Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling
- Option 2 mixed dry recycling and separate food recycling; no glass recycling
- Option 3 mixed dry recycling, separate glass recycling, separate food recycling
- Something else (please expand ...) Separate paper & card should be achievable for most businesses.**
- Not sure/no opinion/not applicable

Q53 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

- Yes – it should be practicable to segregate waste for recycling in most circumstances.
- No – some exceptions are needed for particular circumstances (please provide examples below). See answers to Q51 and Q52 above**
- Not sure/no opinion/not applicable

Q54 Should some businesses, public sector premises or other organisations be exempt from the requirement?

- Yes – See answers above**
- No
- Not sure/no opinion/not applicable

Q55 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?

Small businesses may seek to avoid commercial waste collection and disposal costs if more demanding requirements are introduced. While enforcement action can be taken the costs of investigation etc. are seldom recovered and impose a further burden upon Councils and tax payer. Better to educate and encourage businesses to recycle business paper and card, which can be readily separated and result in a saving to the business, rather than to impose an obligation to recycle all without sufficient resources to enforce against all that don't comply.

Proposal 18

Q56 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**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q57 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?

- Agree**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q58 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?

If a minimum threshold is to be applied, businesses which are likely to generate enough food waste each day to make a collection technically, economically and environmentally practicable would be considered to be generating 'sufficient' food waste to require a collection.

Q59 Do you have any views on how we should define 'food-producing' businesses?

Businesses where food is the core business i.e. produced, packaged or prepared for consumption either on or off site could be defined as 'food-producing'. This could include processing and packaging businesses in addition to restaurants, cafes and takeaways. We feel all organisations which produce enough food waste to justify a food recycling service should be included, this would therefore include e.g. larger businesses where employees bring their own food on site and not just those categorised as 'food-producing'.

Q60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?

- Yes
- No**
- Not sure/no opinion/not applicable

Q61 Do you have any other comments to make about proposal 18?

Concerning Q56, we support this proposal as it then dovetails with the requirements citizens are expected to demonstrate within their households too. This consistency across household and business should help drive behaviour change in both sectors and therefore increase capture of food recycling. It would also likely help to normalise separating food for recycling.

Concerning Q57, the threshold needs to be per facility / building / office rather than on a UK business as a whole.

As a wider point and in accordance with the waste hierarchy, mandating food recycling should not be at the expense of encouraging food waste reduction. It is essential that food recycling (if mandated), would operate in parallel with other national initiatives to reduce food waste.

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.

Q62 What are your views on the options proposed to reduced costs?

We generally support the principle of these options. There is a concern re. the option of collecting household waste and business waste together as there are no indicative plans on how the waste infrastructure may serve such a vast increase of material storage, bulking, haulage and end-processing capacity. It could also see a whole new sector to engage with regarding quality and would have data & infrastructure implications.

Q63 Are there other ways to reduce the cost burden that we have overlooked?
This cannot be considered a viable proposal without considering the disposal infrastructure to allow it to happen.

Q64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?
See answer to Q55.

Business waste data

Proposal 20

Q65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

- Agree**
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q66 Do you have any other comment on Proposal 20?

Concerning Q65, agree though it may be that the organisation that is best placed to do

this in practice may be a waste management company acting on behalf of a business. Nonetheless, the onus should be on the business itself. It would also be helpful for the business to adopt a transparent approach.