

Councillor Claudia Webbe
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Labour Member for Bunhill Ward



Consistency in Recycling Consultation
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Date: 13 May 2018

Dear Madam/Sir,

Consultation on consistency in household and business recycling collections in England

I have pleasure in enclosing my response to the government's Consultation on consistency in household and business recycling collections in England on behalf of Islington Council. We will submit separate responses to the other three related consultations, namely Reforming the Packaging Producer Responsibility System, Introducing a Plastic Tax consultation and Deposit Return Scheme.

We broadly welcome the proposals set out in these consultations. We particularly support the move towards ensuring all boroughs collect at least a minimum range of recyclable materials which Islington already achieves, and to ensuring all households have access to a food waste recycling service. It is essential that the government meets its commitment of ensuring these services are properly funded.

We support the move towards ensuring householders across the country can recycle the same materials, enabling clearer labelling and more consistent collections. This will go a long way towards reducing confusion about what can and cannot be recycled.

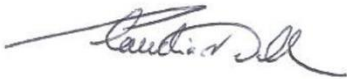
We also support the move to require businesses to separate their recyclable material and would urge the government to apply to same producer responsibility principle to householders too.

We do expect overall that these proposals will go a long way towards transforming recycling behaviour and increasing recycling rates.

We do not consider it appropriate to mandate minimum fortnightly residual waste collections, as evidence suggests this will limit the ability of some Local Authorities to further drive up recycling rates and reduce costs. Overall, the proposals are designed to ensure an increase in recycling. This proposal does not achieve that aim.

We welcome the consultations as a packaging and support the introduction of all three sets of proposals, which complement and support each other.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Claudia Webbe', written in a cursive style.

Councillor Claudia Webbe
Executive Member for Environment and Transport

Islington Council's response to the Consultation on consistency in household and business recycling collections in England

Questions and responses

About you

1. What is your name?

Councillor Claudia Webbe

2. What is your email address?

Claudia.webbe@islington.gov.uk

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

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

Islington Council

5. Would you like your response to be confidential?

No

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

Consultation questions on dry recycling

Proposal 1

We propose that all local authorities in England should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

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.

Islington Council agrees that having all local authorities in England collecting the same core dry recycling materials would eliminate confusion, enable effective campaigning, and enable clear on-pack labelling.

Islington's response to the Consultation on consistency in household and business recycling collections in England

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

Islington Council already collects the proposed core set of materials. While the complexity of a consistent collection service in a densely populated urban area should not be underestimated, we agree that it should be possible for all local authorities to collect the core set of materials given suitable processing facilities and local or stable export markets. We recognise that local infrastructure can be a limiting factor and support should be provided to support new infrastructure as well as new collections.

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

Based on Islington Council's own experience, there are multiple factors that limit the potential for residents in blocks of flats to use facilities that are provided.

In areas of high multiple occupancy, there are significant storage constraints for households both inside and outside the property. There is a higher transient population in these types of dwellings with recycling messages requiring constant repetition and reinforcement. Multiple occupancy does not always guarantee that all occupiers receive messages often delivered to shared hallways or containers. Shared communal facilities can mean that there is no individual ownership of the recycling and costly duplication of personal containers ordered each time occupancy changes hands. Ownership of the waste is rarely considered a personal responsibility.

English may not be the first language in these properties, there may be mobility issues and different cultures can provide additional barriers. Islington has particular deprivation issues and recycling may be low on the agenda of a householder's concerns. Additional resources are required of hard-pressed operational services to deliver a service to flats and HMOs which will involve significant costs in dealing with contaminants. Double vehicle journeys, duplicating costs and staffing are required to clear contaminated containers.

Some of the space limiting factors can impact on the potential to find space for recycling collection containers (more so if there is a requirement to collect different materials separately) and may often result in multiple collections per week, increasing costs. However, we support the proposal and consider that these are practical issues which can and should be overcome.

Q8 What other special considerations should be given to how this proposal could apply to flats?

Islington Council considers that the role of managing agents, landlords and letting authorities would be key to the success of applying the proposal to flats and raising capture rates. Measures should be considered, as we do in Islington, to ensure landlords fulfil their responsibility as responsible landlords, ensure adequate facilities are provided and that use of recycling facilities is stated as a requirement of both landlord licencing conditions and tenancy agreements.

The LWARB guidance 'Waste Management in Purpose Built Blocks of Flats' provides useful guidance.

Focused and targeted communications should be made with these stakeholders in order that they are aware of the recycling materials collected and collection and packaging requirements.

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.

Islington's response to the Consultation on consistency in household and business recycling collections in England

Islington Council suggests that a set of standard information could be considered to insert into tenancy packs.

Collection arrangements should be included in tenancy agreements.

We would encourage support for innovative ideas for making the most of limited space for storage in flats. In Islington we are piloting the use of hooks and specially design collection bags to make internal storage of recycling easier.

A consistent level of service will lead to an expectation that certain materials will be collected and recycled wherever you live. It will help avoid some cross-borough confusion but will not completely solve problems caused by contamination.

Effective enforcement measures are important to enable responsible local authorities to take measure action again residents who persistently refuse to use convenient and reliable recycling services.

Proposal 2

We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

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

	This should be included from the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	x		
Paper and card	x		
Plastic bottles	x		
Plastic pots tubs and trays	x		
Steel and aluminium tins and cans	x		

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 from the core set from the start of Consistency	This should be included from 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	x			
Plastic bags and film	x			
Other materials (please specify)				

Tin foil, aerosols, single use beverage cups

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.

Islington Council believes that phasing materials in over time will cause confusion among residents who will come to learn from the beginning that certain materials cannot be recycled, leading to entrenched behaviour.

Food and drink cartons are widely recycled in Islington and it may lead to more confusion to take a material away rather than adding to a core list.

Plastic bags are extensively used to house recycling before being placed in communal or personal containers and the expectation is that these will be and are currently recycled. While appreciating that food and drink cartons have unreliable end markets and are difficult to process, removal of the generic plastic bag for use as a recycling bag will involve additional strain on budgets to provide immediate and on-going alternatives. We receive these items anyway, and such behaviour, which can make recycling in small properties convenient, should be encouraged.

Measures should be taken to reduce the use of single use beverage cups, particularly to financially incentivise the use of reusable cups. Nevertheless, these items are a common contaminant in mixed recycling streams, particularly from on the go facilities. They are practically recyclable and consideration should be given to including these items in the core materials.

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?

Not applicable.

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

In order to be effective, the scheme should be backed by enforcement powers to tackle contamination or non-compliance.

We would encourage the government to rescind changes to S46 of the Environmental Protection Act of 1990 brought in through the Deregulation Act 2005 that prevented reasonable enforcement measures being taken against householders who persistently do not recycle.

Proposal 3

We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that

- a) evidence supports the benefits,**
- b) there are viable processing technologies for proposed materials,**
- c) there are sustainable end markets,**
- d) local authorities would not be adversely affected, including financially.**

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

Islington's response to the Consultation on consistency in household and business recycling collections in England

Yes.

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 ...)

Islington Council suggests that any review to be given time scales on when they would happen and who would be able to call for a review.

Any changes as a result of a review would be subject to consultation from local authorities who should be represented on any review panel.

Any changes should not inflict any additional burden on local authorities and the full net cost of the change and on-going operational adjustments should be met in full by central government.

Condition b, that there are viable processing technologies for proposed materials, should be modified to consider whether there is a reasonable potential for processing technologies to come on line within a reasonable lead in period. Demand for the processing technology through inclusion of a material in the core material list should drive the supply of processing technologies, not the other way around.

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

Islington Council suggests that no new core materials should be added without a commitment on the longevity of additional financial support, perhaps through a corresponding inclusion in EPR. We are expectant that the funding raised from the EPR proposals will be used to ensure that local authorities are not financially burdened in any way with the costs of realising this and other proposals.

[Proposals for separate food waste collection](#)

Proposal 4

By 2023 we propose to legislate for local authorities to provide all kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners.

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	x		
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	x		

Islington's response to the Consultation on consistency in household and business recycling collections in England

(iii) services to be changed only as and when contracts allow			x
(iv) providing free caddy liners to householders for food waste collections	x		

Islington Council agrees in principle with the proposal. However, there must be a practicability condition whereby the provision of a weekly service will be dependant not only on funding, but on the nature of the housing stock. For example, it is extremely difficult to provide food waste collection services for residents living in flats above commercial premises on busy main roads.

We support the principle that residents should present food and garden waste separately from each other as this has been shown to increase capture rates. We also support the consultation proposals that in some instances, subsequent mixing may be the best option. In Islington, our tipping area is in the middle of the Borough and has limited space, for the mixed stream only. Direct delivery of individual loads to a processing facility would mean many more miles travelled. Furthermore, our one pass vehicles collect food, garden and mixed recycling ion split body vehicles, making the service easy and convenient for residents and more efficient than providing separate collections on separate vehicles.

Islington currently successfully provides free caddy liners to users of the food waste service. It is provided in a targeted way through libraries and community information points rather than a wholesale distribution resulting in inevitable waste. Experience has shown this provision encourages participation and reduces contamination, but is very much based on value for money. We would greatly support the funded distribution of liners to all households on the basis that this will drive up participation and capture rates.

Any future funding should take account of the net cost of the purchasing, distribution, vehicle and staffing costs of the compostable liners which is presently accommodated through existing resources.

Depending on the processing technology used, compostable liners may not be the most suitable caddy liner. The right liner must be provided to fit the technology.

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

Please see our response to Q18.

Q20 Do you have any other comments to make about Proposal 4 including circumstances where it may not be practical to provide a separate food waste collection?

In Islington Council's experience, where residents struggle with limited or zero appropriate outdoor space, there may be no viable way to provide a cost-effective food collection service.

There could be circumstances where despite every effort to encourage successful food waste recycling, food waste services have had to be withdrawn due to persistent contamination.

Islington's response to the Consultation on consistency in household and business recycling collections in England

Particular local circumstances will require a local response while accepting in principle the requirement for separate collections where practicable both economically and environmentally.

If compostable bags are not available to residents, we would support any technology that enabled the use of plastic bags for containing food waste prior to processing.

Proposal 5

We will provide funding and support to local authorities to help put in place the necessary collections infrastructure.

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)

Specific financial support (please specify) i

- Financial support for caddies, communal containers, housing units and liners with replacement of those containers and sacks on an on-going basis.
- Distribution costs and full cost recovery of additional vehicles and staffing costs.
- Container storage costs.
- Communications support, (e.g. free collateral that can be adapted and used locally)

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

Islington Council has actively participated in the 3.2 million euro Trifocal London project focused on reducing avoidable food waste in the capital and increasing awareness of healthier and sustainable eating. The consultation and impact assessment do not account for the effects Trifocal may have on the additional tonnage available to be collected and residents' future behaviour.

Proposal 6

We believe it would be desirable for local authorities that have contractual commitments with IVC facilities, which needs mixed garden and food waste, to require separate presentation of food waste but then be able to mix it with garden waste for treatment purposes. This is because our evidence shows that separate presentation of food waste leads to higher yields.

Q23 What are your views on this proposal?

We agree.

Islington collects food and garden waste together in one compartment of a split body vehicle. The other compartment is for mixed dry recycling. We use one vehicle to effectively and efficiently collect all recycling in one pass, making it convenient for residents, and reducing traffic congestion and emissions.

Being such a densely populated inner London borough, we have no option but to tip at our local tipping facility at Hornsey Street, which can only accommodate a single stream of mixed food and garden waste. This again reduces traffic movements.

There are therefore good contractual, efficiency and logistical reasons for enabling this practice where necessary.

Consultation questions on collecting garden waste

Proposal 7

We are seeking views on whether households generating garden waste should be provided with access to a free collection service. If introduced this this would be a minimum fortnightly collection service of a 240-litre capacity container (either bin or sack). Local authorities may provide additional capacity or more frequent services and would be able to charge for this additional provision

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

	Agree	Disagree	Not sure
(i) a free garden waste collection for all households with gardens		x	
(ii) A capacity to 240l (bin or other container e.g. sack)	x		
(iii) A fortnightly collection frequency (available at least through the growing season)			x
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	x		
			x

Islington's response to the Consultation on consistency in household and business recycling collections in England

(v) this new requirement to start from 2023 (subject to funding and waste contracts)			
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Although Islington continues to provide a free garden waste collection service (mainly for logistical reasons) we do not support the proposal that all Local Authorities should be required to provide this free service.

Charging for garden waste collections is entirely in accordance with the producer responsibility principle, which underpins much of the government's current thinking on waste.

A free garden waste service favours those who are likely to be most able to pay i.e. the 12% of Islington residents that have a private garden and places an extra financial burden on those without.

While some garden waste may enter the residual waste stream when a charge is introduced, charges also encourage behaviour change, such as composting at home, or the use of local free reuse and recycling centres.

Local authorities should not be financially adversely impacted if required to provide a free garden waste service if they previously charged or did not provide the service.

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

No.

[Consultation questions on separate collection to improve quality](#)

Proposal 8

In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality. We propose to amend the law to clarify this and will include guidance in our proposed statutory guidance on minimum service standards to help local authorities and waste operators in decision making on separate collection.

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

No.

Islington Council does not agree with this proposal.

There are no details given of what the amendment to the law will be and whether the statutory guidance will be mandatory or not.

The current TEEP regulations provide adequate guidance on under what circumstances separate collections must be made.

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

Islington's response to the Consultation on consistency in household and business recycling collections in England

In Islington Council's experience, it is not practicable for all our residents and businesses, particularly in the congested urban environment of Islington to separate their recycling into different material streams. There are space constraints inside properties (that already restrict participation in recycling) that are mirrored in the external spaces. Communal waste and recycling bins are often competing for space with parking and cycling spaces and there would be no possibility of separate collection of all materials.

Flats above shops that use the kerbside for their recycling would risk blocking the footpath with multiple bags or containers of different materials or alternatively need to remember designated days for separate materials, which would not, in practice, happen.

Whilst it is acknowledged that separate collection of recycling can aid the quality of recycle collected, a communal collection is a popular, simpler method for residents and reduces the onus of sorting on time pressed communities. This in turn reduces health and safety risks for operatives required to separate materials, including glass and tin cans, at the kerbside.

Kerbside sort slows down the collection service, leading to increased congestion and fuel emissions, a particular disadvantage in inner city areas already trying to take measures to reduce high levels of pollution and meet tight emissions targets.

Q28 Do you have any other comments to make about Proposal 8?

Operationally, additional vehicles may be required to pick up the materials resulting in congested roads with consequent environmental implications.

Separate collection of glass from containers on and near to properties would result in complaints about noise. Mixed collections in communal bins mitigates this noise impact.

[Consultation questions on bin colour standardisation](#)

Proposal 9

Assuming that we progress with proposals for a core set of materials that must be collected for recycling, the government welcomes views on whether England should move to standardised waste container colours for those materials, together with residual waste, food and garden waste.

Q29 Do you agree or disagree with this proposal?

Agree – Islington Council agrees that bin colours **should** be standardised for all waste streams

Please see answer to Q31 below.

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, or

Phased approach 2 – as and when old/unserviceable bins are replaced

Q31 Do you have any other comments to make about Proposal 9?

In principle, Islington Council supports a move to a consistent bin colour for all materials. At all times we should be trying to make recycling services simpler for residents and less confusing. This proposal will help with this objective, but has to be managed in a practical, cost effective way.

Islington's response to the Consultation on consistency in household and business recycling collections in England

We suggest that bin colour changes are introduced during practical service changes, such as the introduction of a new service, rather than specifically when contracts are changed (which may not result in changes to the service or container offered). In the mean time, a phased approach should be adopted, or changes as and when containers are replaced.

Islington has adopted clear colour guidelines for its recycling and waste containers. We have proactively adopted a phased approach to replacing communal recycling bin lids with a green lid to denote recycling when old or unserviceable bins are replaced. We are also phasing out the use of the colour green for business waste bins. This approach is primarily because the cost of a wholesale replacement of existing container stock for residents and businesses would be prohibitive. The drawback to this approach is that it will take longer to implement. The benefit is the reduced cost and gradual acceptance by residents of the meaning behind the coloured lid.

We suggest a possible short-term win of a labelling system with unifying colours for recycling containers. This approach could work as an interim change in conjunction with and not instead of a longer term permanent move to bin colour coding. Any labelling system would require significant communications to avoid resident confusion.

Evidence from WRAP supports this proposal. The results on their survey for a national bin colour scheme indicate that 88% of respondents supported a national bin colour scheme. 91% of respondents said this would simplify communications to households and 83% said it would reduce householder confusion. Nevertheless, WRAP estimates introducing a national bin colour scheme would cost between £290-317 million.

Consultation questions on service standards

Proposal 10

We are proposing to prepare statutory guidance on minimum service standards to which local authorities will be required to have regard. The detail of this guidance will be consulted upon in our second consultation

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

Agree, but NOT in relation to minimum residual waste collection frequencies.

Furthermore, Islington Council is concerned that the Government is proposing to link the payment of producer fees to local authorities to the adoption of these minimum service standards, which as stated in the consultation document would include the application of separate collection arrangements or TEEP. Should local authorities not follow this statutory guidance, then payment of producer fees could be withheld, thus absolving the Government of any requirement to fund the changes under the New Burdens doctrine.

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

Reviews should be infrequent to ensure local services are not subject to frequent imposed changes.

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?

Not applicable

Islington's response to the Consultation on consistency in household and business recycling collections in England

Islington Council disagrees with proposal 10 in relation to residual waste collection frequencies.

Islington provides a once weekly collection of both recycling and residual waste so we would already be above the proposed minimum standard for residual waste.

However, there is clear evidence from across the country, that restricting residual waste increases recycling rates, and most of the top performing recycling Boroughs operate waste collection frequencies that are less than weekly. A significant number are now successfully moving to less than fortnightly residual waste collections, delivering even higher recycling rates and savings.

We believe that this is a matter for local authorities, based on their local democratic mandate and local circumstance. Local Authorities should be allowed to operate waste and recycling collection frequencies that suit local circumstances so long as the minimum requirements for collecting certain material are met.

There are parts of central London where space constraints and use of communal bins means that low frequency collections will not be appropriate. In these places, constraining bin size can be a more effective and appropriate tool to increase recycling rates; recycling and food waste collection would also continue to be frequent services in these areas.

We therefore believe that authorities should retain the discretion to limit residual waste capacity – whether through collection frequency, bin size, or the use of “no side waste” policies.

Lastly, we note the consultation states that ‘If local authorities implement the changes in this consultation, they would increase recycling significantly.’ This is not the case with this proposal.

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?

It is normal practice for Islington to support Recycle Now and the tools produced by WRAP in addition to localised communications materials and messages.

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

- Clear information on what can and can't be recycled
- What happens to the recycling and waste after collections
- Potential environmental impacts if it is not managed responsibly
- Potential local impacts if waste is not recycled

Proposal 12

We will work with local authorities and others to improve transparency of information available to householders on the end destination for household recycling.

Q38 Do you agree or disagree with this proposal?

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

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

Islington's response to the Consultation on consistency in household and business recycling collections in England

This is common practise in Islington with information published on our website through our waste disposal authority. Transparency of end destinations for recycling is crucial in gaining public confidence in recycling, particularly if there is a drive towards increasing processing capacity and markets within the UK and the EU rather than further afield.

[Consultation questions on end markets](#)

Proposal 13

No specific proposal, but a general aim to increase UK markets, reduce exports and improve the stability of markets

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

The proposed plastic packaging tax on material which does not contain at least 30% recycled plastic content is a welcome measure and Islington would support other products/materials that could be included. Islington Council's recycling procurement contracts already place a premium on the recycled content of products and materials.

It is hoped that the EPR will play a positive impact on product design to make packaging designed for recycling and making it easily sortable.

[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

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

Disagree

Islington Council agrees that non-binding performance indicators should be set for recycling, food and garden waste recycling rates. However, indicators should also reflect the level of service provided to residents. The consultation highlights the local factors that can influence recycling rates and are beyond local authority control. Local Authorities should therefore be measured on the effort the put in and the service they provide to residents, as well as the outputs from those services.

There should be an overall household waste KPI.

We are also concerned that an ongoing focus on recycling rates takes away the incentive to focus on reducing avoidable food waste, reducing packaging waste, especially single use plastic, and other recyclable item and promoting home composting.

Islington's response to the Consultation on consistency in household and business recycling collections in England

We would encourage the application of these KPIs to private waste collection operations as well as Local Authorities so that the performance of all waste collection operations can be viewed. This would also provide honest comparable information to businesses looking for a collection service to compare providers' performance.

A carbon based measure would be preferable such as the EPS being used by the Mayor of London to measure the environmental impacts of waste services.

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

Non-binding indicators would be useful for benchmarking purposes as long as they are not resource intensive or used to withhold funding.

[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

Islington welcomes alternatives to weight-based metrics being developed. A focus on weight-based metrics favours authorities in suburban and rural areas due to the influence of garden waste tonnages resulting in unfavourable comparisons.

Please also see our response to Q42.

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

Agree

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

Islington Council welcomes additional indicators such as carbon dioxide equivalent emissions per tonne of waste managed because this allows for the environmental impact of lighter waste materials to be factored into decision-making. In London we already provide carbon equivalent emissions information.

Additional indicators that could be considered include social benefit indicators as well as some metrics to better reflect the impact of waste prevention activities.

As indicated in our response to Q42. Indicators should also reflect the service provided to residents, such as percentage of households with a particular service.

[Consultation questions on joint working](#)

Proposal 16

Islington Council wants 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.

Islington's response to the Consultation on consistency in household and business recycling collections in England

Q47 Do you agree that greater partnership working between authorities could lead to improved waste management and higher levels of recycling?

Agree

Q48 What are the key barriers to greater partnership working?

Agree with all the barriers that are identified namely: -

- a. Local political differences
- b. The different financial positions of different authorities
- c. Feasibility costs and transition investment
- d. Historic collection methodology and different contract durations
- e. Proximity and access to waste transfer infrastructure and vehicle depots
- f. Perceived loss of sovereignty or ability to make decisions at a local level
- g. Challenges introduced by new governance structures and decision-making capacities.

Islington Council would also include

- Financial disparity between different authorities
- Different socio/economic drivers.

Q49 How might government help overcome these barriers?

Additional and targeted resources for the poorer performing boroughs

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

Islington would welcome greater collaboration and partnership working and consistency would provide interesting opportunities; particularly in the procurement field.

London has excellent partnership and joint working arrangements – the Statutory Joint Waste Disposal Partnerships and the South London Waste Partnership – in place. Our own North London Waste Authority is an excellent example of partnership working, particularly relating to disposal arrangements and procurement, communications and consistency of services. We recognise the value of partnership and welcome Government's encouragement of this practice. However, partnerships have their own challenges, with pooled decision-making tending to move services away from local democratic accountability. It is important that, in encouraging partnership, the Government does not leave local authorities with limited control over one of their key public-facing services.

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

We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to legislate so that these establishments have to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste operators.

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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

Waste operators are already required to provide a separate collection of recycling on request (Waste (England and Wales) Regulations 2011). Other than a general requirement for businesses to comply with the waste hierarchy and meet duty of care requirements, there is no requirement for businesses to recycle. Islington Council welcomes proposals to change this to ensure that businesses must separate out their recyclable material for recycling.

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 ...)**
- Not sure/no opinion/not applicable**

Islington Council agrees that businesses should be required to separate out any materials that are in the government's minimum standards list, but in a format that suits local service arrangements (i.e. commingled, or glass separate etc).

At present our recycling scheme accepts glass with other recyclable items, so we favour this scheme along with a separate food waste collection.

However, businesses may also use private waste management companies as well as local authorities, and recycling options must be compatible with local collection and processing options. Businesses should be required to separate out any materials that are in the government's minimum standards list, but in a format that suits local service arrangements (i.e. commingled, or glass separate etc).

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 all circumstances

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

No

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?

Islington Council welcomes the proposal to require businesses to recycle, as well as the general move toward producer responsibility. We are puzzled, therefore, why the government has not

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applied the same principle to householders. At present, Local Authorities provide effective and reliable recycling services, and it is entirely at the discretion of householders whether or not to use these recycling services.

Islington Council has a compulsory recycling policy which means that you must recycle using the services provided at your home. However, provisions in the EPA 1990 enabling Local Authorities to require the use of certain containers for certain waste streams were stripped away as part of the Deregulation Act 2015. We would urge the government to apply the producer responsibility principle to all producers of waste, including householders, to enable local authorities to take reasonable and proportional measures against those who persistently fail to use local, convenient recycling services.

Proposal 18

Where a business, public body or other organisation produces sufficient quantities of food waste we propose to legislate for this to be separated from residual waste and arrangements made for it to be collected and recycled.

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

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

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?

Weekly food waste collections from households may result in a small caddy's worth of food waste being collected. Islington Council feels this is still worthwhile. There will be few businesses producing less than this amount of food waste per week.

However, other factors could come into play such as whether it would be economically worthwhile travelling to collect from one business customer in a street or in a remote area, whereas multiple customers may mean lesser weight is sufficient.

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

No

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

No

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

Funding from the Extended Producer Responsibility should be made available to authorities for specific business waste education and enforcement roles to support the proposal for food waste collections from businesses.

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Islington combine staffing for household and business waste container deliveries. With a growth in the collection of food waste this will place too great a burden on existing resources. Under the consultations full recovery of funding promise, the improvements will require additional vehicle(s) for both collection and delivery of containers, and crew, admin and sales staffing to accommodate the increase in service. These costs will need to be regularly reviewed and uplifted as the demand for the new service spreads.

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?

Some of the proposals are already being used in Islington e.g. co-collecting, collaborative procurement, and we feel that the proposals overall form a good basis to work from.

Of particular interest to London local authorities are the proposals regarding a franchise model for commercial waste. We have seen various business improvement districts develop local arrangements, with variable results. In some cases, take-up has been very limited, as local businesses are under no obligation to take up the service. Indeed, chain stores will often be locked into national contracts, and will have little incentive (or even capability) to make alternative arrangements locally.

In London, where shops and homes are intermingled, where air quality is a major concern, and where there are significant problems of uncontracted commercial waste, there is a strong case for taking steps that would reduce vehicle movements, cut costs and allow waste to be managed holistically – something that local authorities could offer.

The highest priority for franchising would be areas, such as high streets, village centres and back streets, where commercial and residential waste can be collected together. Once EPR comes into effect, it may be possible in this model to provide dry recycling services at very low cost, and to integrate commercial and household food waste collections as we do in Islington. Authorities could also collect from locations such as retail parks, trading estates and large superstores. There may be a role for local consultation to give such business areas the option to join the franchise, or to make their own arrangements.

Clearly, businesses will wish to be reassured that the service provided by councils represent good value for money. This could be achieved through benchmarking (especially where services are delivered in house). Where councils outsource their collections, businesses would have the assurance that the work has been competitively tendered and that the most economically advantageous option has been selected.

Taking on a greater share of commercial collections would strengthen authorities' ability to effectively manage the local street scene, and crack down on unregulated commercial waste. It would help reduce the amount of time that bins and sacks are out on the street – perhaps through wider use of time banded collections. It would enable authorities to be more effective in enforcing existing waste legislation – and to play the role of enforcement body for the new source separation obligations upon businesses.

We therefore welcome the proposal and look forward to its further development. The Government will need to consider:

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Who decides the franchise area and runs the franchising process? If this is the local authority, can the local authority also provide the collection service?

Would there have to be a bidding process – and if so, who designs and implements it?

How can the opportunities to offer better services, more recycling, fewer vehicle movements and better standards especially around staff welfare, H&S, and street scene best be delivered? Local authorities may often be best placed to offer these benefits.

If as a result of a franchise arrangement, a local authority is excluded from collecting commercial waste in its area, would it be exempted from its duties under S45 (1b) EPA1990?

If local authorities incur upfront costs of collecting more commercial waste, would these constitute a 'new burden'?

Q63 Are there other ways to reduce the cost burden that we have overlooked?

Islington Council suggests that businesses could be offered funding to pay for a cost analysis of their waste with a view to determining their most efficient waste management option.

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

Islington Council considers that marketing and education will of course be critical.

Islington enjoys good relationships with local Town Centre managers and business forums. These could be critical to ensuring members are aware of any new arrangements and promote and support the arrangements through their forums.

It is crucial that the new arrangements are presented as improvements and not as a measure to make money.

Businesses could be provided with a government advice/helpline during the transition period to support them making the change.

Proposal 20

As part of implementing consistency, we will work with waste producers and waste collectors in the non-household municipal sectors to improve reporting and data capture

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

Agree

Islington Council agrees that more reliable data is needed in this area; Government could look to require waste management firms to provide this level of data. It will be good to get this information if possible as it is not currently easy to get accurate non-household municipal waste data and it will help manage this element of the waste stream more effectively.

We would also support a requirement for businesses above a minimum less being required to make public their waste and recycling arrangements and performance in order to be held accountable by their customers.

Q66 Do you have any other comment on Proposal 20?

No.