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Date: **20 November 2023**

To DEFRA,

Consultation on exemptions and statutory guidance for Simpler Recycling in England

We write to you today in response to the call for information “Consultation on additional policies related to Simpler Recycling in England” published on 21 October. This response follows engagement with EELGAs members, the fifty local authorities within the East of England. For more granular detail, we would ask you to study the individual responses made by those members.

While other consultation that attract mixed or agreed responses, this response pertains specifically to Q15 of the response, titled “*The guidance outlines a backstop on the frequency of collection of residual waste, to protect householders’ local amenity. Do you agree or disagree with the content of this section*”. Our member authorities would like to challenge the idea of backstops on frequency, and do so for the following reasons:

Bin Capacity

The Government’s position on the frequency of residual waste collection appears to be focused on 2 main issues including capacity and foul odours. However, in reality, considering kerbside services for dry recyclables, garden wastes (chargeable and free) and separate food waste collections, most householders now have substantially more bin capacity to manage their household waste.

Again, subject to the specific model, residual waste collections based on 3 weekly collections will only reduce overall annual capacity by no more than 8 – 10%. But set in context, this is still in the region of 40% higher compared to a weekly residual waste service only. On this basis trends in recent years have seen households given *more* bin capacity and not less.

Concerns around foul odours

Based on the same type of analysis and methodology, including the provision of weekly food waste collections whilst also maintaining current frequency collections for nappies/continence waste, Local authorities are now looking to update collection models by further reducing residual waste collection frequency. This should be seen as a mark of progress and is highly likely to be regarded positively by 'EPR Producers' who will have to fund packaging wastes left in the residual waste stream.

Wider Context

In addition to local authorities providing much more capacity, current service configurations are based on prioritising the separate collection of recyclables and compostable organics (food waste and garden waste). Therefore, they better align with Government targets set out in the Resources & Waste Strategy as well as wider climate change commitments including reductions in local emissions.

The Government should also consider that ongoing reductions in residual waste, whether at the kerbside or the network of recycling centres provided by waste disposal authorities, are part of changes that will make fundamental contributions to a range of Government targets. These targets include, but are not limited to:

- Achievement of a 65% recycling target by 2035.
- Reduction of residual waste per capita by 50% by 2042 from 2019 levels.
- Near elimination of the landfilling of biodegradable municipal waste by 2028.
- Mitigation of costs linked to the inclusion of energy from waste plants in the Emissions Trading Scheme from 2028.

None of the above will be achievable if the country maintains its current approach to residual waste management.

New Burdens Funding

To provide much-needed clarity, EELGA urges the publication of a definitive statement setting how New Burdens funding for waste collection and waste disposal authorities will apply. There have been contradictory statements made by Government officials in this area, and a final clarification would be of great use.

This statement needs to confirm the timing for when New Burdens funding applies including both capital funding for equipment as well as revenue funding to support new collection services. The statement should also be clear about the level of New Burdens funding that will be provided to waste disposal authorities to support the adaptation of current transfer station processes to support the new food waste collections.

Core-set recyclables

Finally, Local authorities have raised that it is vitally important that the Government 'manages' the core-set recyclables positively. To this end, our member authorities would like to see details

related to recycling assessment methods released. This is a necessary part of an ongoing conversation about how the national core-set can be developed over time.

The process needs to recognise the multitude of stakeholders involved including the different lead in times for change that consider the intertwined nature of the service. The addition of new materials will need to be supported by appropriate transfer and sorting technology; which will, in turn, need to be supported by robust and sustainable UK end markets.

Summary

In summary, there are concerns about the efficacy, strategy, and sustainability of a collections backstop. Primarily, member authorities feel that concerns around a lack of capacity should collections move to once every three weeks are misplaced. The evidence suggests that this is not the case, and once combined with the additional bins for recycling capacity, waste collection capacity for residents increases.

Secondly, there are concerns that such a backstop would appear to run counter to several Central Government key strategies, including net-zero commitments and the Resources & Waste Strategy. Finally, there are questions about the implementation of these measures that are generating uncertainty. In particular, a strategy for the management of core-set recycling is required, and a clear outline of the new burdens funding that can be expected is needed.

The freedom for local authorities to choose the policies that work for their area is a key component of devolution. This, in turn, helps foster the municipal entrepreneurialism that makes local authorities so effective in serving their area. For this reason, and for the reasons outlined above, we would challenge any centrally set target that would limit that freedom.

Yours sincerely

Cllr Graham Butland

Chair of the Infrastructure and Growth Panel