

Joint Waste Disposal Board

Notice of Meeting

Thursday, 17 June 2021 (9.30 am)

TO: All Members of the Joint Waste Disposal Board

You are invited to attend a meeting of the Joint Waste Disposal Board on **Thursday 17 June 2021 at 9.30 am** in the Mayor's Parlour - Civic Offices, Reading. An agenda for the meeting is set out overleaf.

Oliver Burt
Project Director

Members of the Joint Waste Disposal Board

Councillor Mrs Dorothy Hayes MBE, Bracknell Forest Council
Councillor John Harrison, Bracknell Forest Council
Councillor Adele Barnett-Ward, Reading Borough Council
Councillor Tony Page, Reading Borough Council
Councillor Parry Batth, Wokingham Borough Council
Councillor Gregor Murray, Wokingham Borough Council

Emergency Evacuation Instructions

If you hear the alarm:

- 1 Leave the building immediately
- 2 Follow the green signs
- 3 Use the stairs not the lifts
- 4 Do not re-enter the building until told to do so

**Joint Waste Disposal Board
Thursday 17 June 2021 (9.30 am)
The Mayor's Parlour - Civic Offices, Reading.**

Agenda

Page No

1. **Apologies for Absence**
2. **Declarations of Interest**

Members are asked to declare any disclosable pecuniary or affected interests in respect of any matter to be considered at this meeting.

Any Member with a Disclosable Pecuniary Interest in a matter should withdraw from the meeting when the matter is under consideration and should notify the Democratic Services Officer in attendance that they are withdrawing as they have such an interest. If the Disclosable Pecuniary Interest is not entered on the register of Members interests the Monitoring Officer must be notified of the interest within 28 days.

Any Member with an affected Interest in a matter must disclose the interest to the meeting. There is no requirement to withdraw from the meeting when the interest is only an affected interest, but the Monitoring Officer should be notified of the interest, if not previously notified of it, within 28 days of the meeting.
3. **Minutes of the Meeting of the Joint Waste Disposal Board** 5 - 10

To approve as a correct record the minutes of the Joint Waste Disposal Board held on 21 January 2021.
4. **Urgent Items of Business**

To notify the Board of any items authorised by the Chairman on the grounds of urgency.
5. **re3 Progress Report** 11 - 20

To brief the re3 Joint Waste Disposal Board on progress in the delivery of the re3 Joint Waste PFI Contract.
6. **Review of Recycling Centres' Booking System** 21 - 32

To brief the re3 Joint Waste Disposal Board on access options for the re3 recycling centres.
7. **re3 Strategy Report** 33 - 52

To brief the re3 Joint Waste Disposal Board on progress in the delivery of the renewed re3 Strategy.

To provide a briefing for the Joint Waste Disposal Board on two consultations, under the Resources and Waste Strategy sections of the forthcoming Environment Bill.

It had not been possible to report to the Board prior to the submission of the two consultation responses, though some separate Member briefings were arranged. This report provides an opportunity to record the response made by the re3 partnership and explore the opportunities for the councils to prepare for future compliance.

To consider the following motion:

That pursuant to Regulation 4 of the Local Authorities (Executive Arrangements) (Access to Information) Regulations 2012 and having regard to the public interest, members of the public and press be excluded from the meeting for the consideration of item 10 which involves the likely disclosure of exempt information under the following category of Schedule 12A of the Local Government Act 1972:

- (3) Information relating to the financial or business affairs of any particular person.

To brief the re3 Joint Waste Disposal Board on the Partnership's current financial position, to confirm the second draft budget.

11. Date of the Next Board Meeting

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**JOINT WASTE DISPOSAL BOARD
21 JANUARY 2021
(9.30 - 10.37 am)**

- Present: Bracknell Forest Borough Council
Councillor Mrs Dorothy Hayes MBE
Councillor John Harrison
- Reading Borough Council
Councillor Adele Barnett-Ward
Councillor Tony Page
- Wokingham District Council
Councillor Parry Batth
Councillor Gregor Murray
- Officers: Grace Bradbrook, re3
Monika Bulmer, re3
Oliver Burt, re3
Andy Edwards, Reading Borough Council
Kevin Gibbs, Bracknell Forest Council
Damian James, Bracknell Forest Council
Gareth Jones, Bracknell Forest Council
Clare Lawrence, Wokingham Borough Council
Claire Pike, Bracknell Forest Council

19. **Declarations of Interest**

There were no declarations of interest.

20. **Minutes of the Meeting of the Joint Waste Disposal Board**

RESOLVED that the minutes of the meeting of the Joint Waste Disposal Board held on the 8 October 2020, be approved as a correct record and signed by the Chairman.

21. **Urgent Items of Business**

There were no urgent items of business.

22. **re3 Progress Report**

The Board considered a report on progress in the delivery of the re3 Joint Waste PFI **Contract. Andy Edwards, Assistant Director Environmental & Commercial Services** introduced the report.

The report covered:

- Waste Flows (since commencement of virus Lockdown/beginning of 20/21)
- re3 Waste Statistics
- Ongoing Operation of re3 HWRCs as Covid-19 Measures Evolve
- User Satisfaction

- Lakeside Energy from Waste and Heathrow
- Chargeable Wastes at HWRC
- Trade Waste Service
- re3Grow
- re3Paint
- WRAP Contamination Project
- Clinical Waste
- Climate Change
- re3 Strategy and Partnership
- Review of Performance Monitoring
- Communications

The report covered the changes that had been made to the re3 booking system, which now allowed users to cancel their bookings if they no longer required them, in time for potential reallocation.

The annual user satisfaction survey couldn't be conducted in the usual way due to the pandemic, so was conducted using an online form during December. More than 3000 responses were received across both sites, with satisfaction levels scoring high.

The main phase of a project aimed at understanding and targeting contamination, in Bracknell and Reading, had been completed, and the provisional results in the trial areas were positive.

A review of the chargeable waste rates at the HWRC had also been concluded. The charges, for non-Household Waste types, are for costs only, with no profit being made. Officers reported the proposals to reduce the cost for some items such as soil and rubble.

The re3 reusable paint scheme was now available for residents at the HWRC sites.

To help improve information to residents about recycling and to help reduce untidiness and/or fly-tipping at bottle bank sites, new stickers were being applied to bottle banks. The stickers feature a QR code, which can be scanned by smartphones for access to a web-page containing information about the appropriate use of the bottle banks. The information is available in English as well as being translated into 6 other languages, in use across the re3 area.

A range of educational webinars covering topics of recycling and waste management had been delivered to re3 residents via Zoom in November and December 2020, these covered topics including the benefits of food waste recycling and festive recycling tips and statistics.

The situation regarding the transmission of the Covid-19 virus had been worse than last March/April amongst staff. At one point up to 24 re3 staff were having to self-isolate due to family members displaying symptoms or having been contacted by track and trace. There were no service reductions at present, but all contingencies put in place in Spring 2020 remained open.

Members reported that feedback received about the online booking system had been very positive, and it was felt that a booking system should remain going forward. Officers agreed that a review would take place in June 2021, where options for the system could be looked at in detail. It was requested that a paper be brought to the Board at its July meeting.

Since introducing the facility to cancel bookings, on the Recycling Centre booking system, overall numbers of bookings had been lower than earlier in the year, due to Christmas and the post-Christmas 'lull' being included within in this period. While it was apparent that bookings were being cancelled now, the number of 'no shows', where a booking is made but not redeemed via an actual visit, had not yet reduced by the amount hoped-for by officers. Officers undertook to continue pushing positive messaging about the cancellation facility because service efficiency is important, not least for residents who may miss-out on a booking as a result. This would also be revisited as part of the June review.

The booking system had been shown to manage a steady flow of visitors, reducing off-site impacts such as queuing which had often caused unwanted outcomes for neighbouring businesses and other council services, who also use the sites. However, by so managing the flow of visitors, officers explained that it was not possible to identify when highest demand for bookings. This was expected to remain at weekends.

An automated reminder email is sent to all residents prior to their bookings. Officers undertook to investigate whether the system was able to send out automatic emails to those residents that had missed their slots. This would be discussed with the provider.

Covid tonnages had been tracked throughout the period from the first lockdown, residual waste was up 10%, kerbside recycling had increased by 13%, garden waste had increased by 21%, food waste by 28% and the bring banks were up 33%.

RESOLVED that

- i. Members note the contents of this report.
- ii. Members agree, subject to continued review at each re3 Board meeting, to provisionally retain a booking system, for access to the two re3 Household Waste Recycling Centres, until the end of June 2021, as described at 5.22 and that a report be brought to the July 2021 Board Meeting.
- iii. Members approve the changes to Non-Household Waste and Trade Waste Prices, as presented at 5.40
- iv. Members note the review of the performance monitoring regime described from paragraph 5.86 to 5.91.

23. Date of the Next Board Meeting

The Group was reminded that its next meeting would be held at 9.30am on Thursday 29 April 2021.

24. Exclusion of Public and Press

RESOLVED that pursuant to Regulation 21 of the Local Authorities (Executive Arrangements) (Access to Information) Regulations 2000 and having regard to the public interest, members of the public and press be excluded from the meeting for the consideration of item 8 which involves the likely disclosure of exempt information under the following category of Schedule 12A of the Local Government Act 1972:

(3) Information relating to the financial or business affairs of any particular

person.

25. **Financial Report**

The Board received a report which briefed them on the Partnership's current financial position and to confirm the second draft budget.

RESOLVED that

- i. Members noted the Partnership's financial position for the year to date.
- ii. Members noted the contents of the financial report.

26. **re3 Workshop**

The Board received a presentation from Oliver Burt, re3 Strategic Waste Manager and Project Director, as part of their re3 Workshop. Following the presentation, it was planned that the separate Councils would then hold their own individual workshops. The presentation was intended to inform these individual workshops and each council would set aspirations and objectives, which would be brought back to the board.

Arising from the presentation, the following points were made:

- In January 2020 a new strategic pathway had been discussed, which had been delayed while the councils focused on issues related to the Covid-19 pandemic.
- The last 12 months had been difficult, but great recognition, of the work done throughout waste management during the pandemic, had been received.
- Both facilities were up for a Recycling Facility of the year award.
- A strategic pathway had been introduced in 2016, since then plastic and wood recycling had been introduced, improvements made to HWRCs and food waste recycling had been introduced in Wokingham and would shortly be introduced in both Reading and Bracknell.
- Collectively across the partnership £14m was spend on collection, £23m was spent on disposal, there were £5m on overheads, £8m of income from services such as garden waste collection, charges levied on non-household waste and from government grants. The net cost was circa £35m.
- There was great scope to make changes to the processes.
- There were a number of current factors that needed to be thought about at present, these included market demand, public engagement, legislation, Covid and Climate Change.
- The partnership managed to successfully accommodate the different approaches of each Council.
- It was important for Bracknell Forest Council that their imminent service roll outs be successful. Similarly, for Reading, where services in flats were also of importance Dry paper and card collection changes for Wokingham were important for 2021/22.
- The focus for the re3 partnership during 2021 were to ensure recycling waste from disposal would help reduce cost and improve environmental outcomes.
- Reducing contamination would help increase recyclability and help reduce costs.
- The HWRCs would be focusing on reviewing the booking system, and also help visitors to maximise the efficiency of their trips.
- The HWRCs would also be seeking ways of reusing more locally.
- The change in demographics and population growth of residents need to be looked at more closely from a waste perspective. ONS modelling showed an

aging population between 2020 – 2040. This may change the way waste is collected and how the service is changed going forward.

- As a result of the pandemic, it is possible that more people may be move out of cities, to areas such as the ones covered in the partnership.
- If 40% of the recyclable material in residual waste was captured and recycled, then significant savings and efficiencies could be made in 2021.
- The re3 partnership used only 3 material processors used that were not in the UK.
- Vehicles and haulage needed to be looked at as part of the environmental impacts.
- A synthesis of energy usage and generation and local treatment could be explored.
- Each Council had made their Climate Change commitments, and these would be considered within a subsequent re3s strategy.
- It had been reported that waste sector emissions had fallen by 46% since 2008.
- There were big legislation changes to waste collection, within the forthcoming Resources and Waste Strategy, with further consultation in March 2021.
- Compulsory collections consisted of core set of six materials including a glass collection.
- There was strong public support for a free garden waste collection.
- There were three prescribed collection systems, one of which would have to be adopted, recognising the procurement cycle in such contracts.
- Municipal waste would replace household waste, bringing England into line with the system already adopted in Wales.
- A deposit return scheme (DRS) was an important aspect of the new legislation, it is likely to cause some change and potential disruption to existing methods of waste collection. Government assumptions indicate that 85% of relevant packaging types could be returned via a DRS.
- It would be possible to consider the development of a food waste facility,if this was one of the things that the Council's aspired too.
- It was requested that the thoughts from each council be delivered back within a fortnight so Officers could look to report back at the next meeting.

CHAIRMAN

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TO: JOINT WASTE DISPOSAL BOARD
17th June 2021

PROGRESS REPORT **Report of the re3 Project Director**

1 INTRODUCTION

- 1.1 The purpose of this report is to brief the re3 Joint Waste Disposal Board on progress in the delivery of the re3 Joint Waste PFI Contract.

2 RECOMMENDATION

- 2.1 That Members note the contents of this report.
- 2.2 That Members request an update on the rigid plastics recycling trial, as described at 5.26, to be presented at the next meeting.

3 ALTERNATIVE OPTIONS CONSIDERED

- 3.1 None for this report.

4 REASONS FOR RECOMMENDATION

- 4.1 The purpose of this report is to brief Members in relation to progress in delivery of the re3 Joint Waste PFI Contract.

5 PROGRESS IN RELATION TO WASTE MANAGEMENT

re3 and Council Performance Statistics

- 5.1 Members will be aware that all three councils have now commenced a food waste collection. Food waste collections were rolled out to all houses in Reading Borough Council in February 2021 and the existing complement of, principally 240 litre, residual waste bins were replaced with smaller ones. In March 2021, Bracknell Forest commenced food waste collections across the borough and changed the collection frequency for residual waste from fortnightly to three-weekly. The reduction in residual waste capacity, alongside the new collections have had a positive impact in the recycling rate and this can be seen most clearly in the data for the new contract year.
- 5.2 Quarter 1 of 2021/22 will be the first full quarter reflecting these changes, and the introduction of the new bags (for paper and card) in Wokingham. Officers will continue to provide regular updates on the recycling rate (which incorporates both the waste collected by the councils and that delivered to the two recycling centres). A more detailed breakdown of the data for April is provided in Appendices 1 and 2, alongside the equivalent (April-June) data for 2020/21.

April 2021

BFC – 56.64%
RBC – 52.46%
WBC – 53.68%

- 5.3 As the changes described above were introduced late in 2020/21 their impact on the provisional full year results were limited, as shown in the table below. However, with

continued council focus on recycling services, officers would expect the April statistics to be more reflective of future performance.

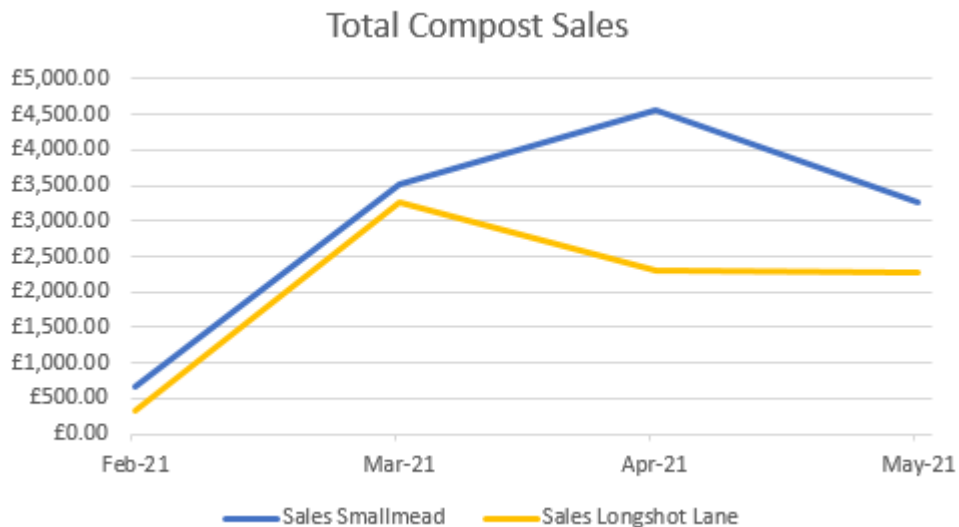
Recycling Rate

Council	2019/20 Full Year Recycling Rate	2020/21 Full Year Recycling Rate
Bracknell Forest	42.9%	43.4%
Reading	35.3%	36.1%
Wokingham	50.3%	49.5%

- 5.4 A breakdown of the April recycling rate has been presented in Appendix 2. The growth in food waste, and its positive impact on recycling is apparent.
- 5.5 Also notable is the increase in the 'other' category within Reading. The decline in recycling rate, for the same period in 2020/21, was particularly pronounced in Reading due to a suspension in green waste collection service. As green waste collections have returned to normal, this contributes to the greater increase in recycling rate seen for RBC.
- 5.6 Bracknell Forest and Reading have seen increases in their kerbside recycling tonnages following on from the recent changes. Whilst decreases in residual waste capacity could have led to increases in MDR contamination, the MRF sampling data has not shown this to be the cause of the additional tonnages.
- 5.7 Members will note that a significant reduction in MDR contamination has been seen in Wokingham. Overall contamination has dropped from about 19% of MDR (mixed dry recyclables) to less than 10%. This will be a result of the introduction of the new recycling bags, which prevent paper and card from becoming saturated with rain water. Like the changes in residual waste capacity mentioned above, the introduction of new bags could also have led to an increase in unwanted contamination, but the MRF sampling data has not yet shown this to be the case.
- 5.8 There have been no rejections of Wokingham MDR since the middle of March.
- 5.9 As shown at Appendix 1, kerbside recycling rates for Bracknell and Reading have increased when compared to last year. Members will recall that the kerbside recycling rate presented, represents council waste, collected for recycling, as a proportion of total household waste. This will be a result of the new food waste collections. In contrast this figure has gone down in Wokingham. This is because the kerbside recycling rate was unusually high in Qtr1 2021/22 due to temporary closure of the recycling centres, caused by the outbreak of the COVID 19 pandemic.

re3Grow

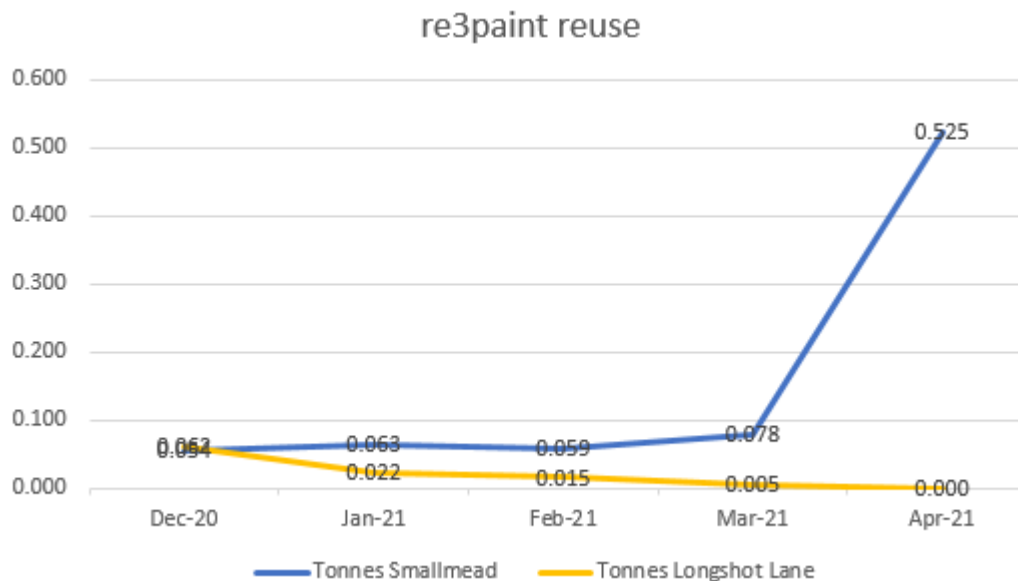
- 5.10 Following a winter break, the sales of the re3grow compost commenced on 22nd February. A total of 6,045 bags of re3grow compost were sold, with total income of £20,190 by the end of May 2021. The income received covers the cost of production and administration within the re3 Project Team and FCC.



- 5.11 re3grow sales has performed very well during the year to date. re3 currently has less than 2,000 bags remaining meaning that over 75% stock has been already sold.

re3Paint

- 5.12 *re3paint*, a community paint reuse scheme has been in operation since December 2020.
- 5.13 The re3paint – Community Paint Reuse initiative allow residents to collect free tins of full or partly used paint that were deposited at the Recycling Centres. Reclaimed paint can be used for their own projects or to help their local charity and community groups.
- 5.14 The service has not received a sufficient exposure during the lockdown period and winter months. The average diversion of paint from Longshot Lane and Smallmead were 26 kg and 56kg respectively.
- 5.15 To grow the service popularity, in April there has been a change of the location of paint containers at the Reading site (next to the Meet&Greet area). This step combined with an increased promotion on the social media and via the re3 newsletter, resulted in distributing over 500kg of leftover paint from the Reading site alone.
- 5.16 Similar changes that aim at the better visibility of the paint reuse container have been undertaken at the Longshot Lane.
- 5.17 Further promotional activities include adding stickers to the containers that explain the benefits of the scheme and invite residents to share their redecorating work that can be used to raise awareness of reducing paint waste.
- 5.18 Officers will also make guidance available to residents on the types of paint which is suitable for reuse and recommend that residents harden any water-based paint that is too old or minimal to be reused.



Rigid Plastics Recycling Trial

- 5.19 The re3 Partnership is keen to explore the options available for extending their recycling services and Officers have previously looked into a number of different possibilities for the recycling of rigid plastics.
- 5.20 By weight, rigid plastics make up approximately 11% of all residual waste received at Smallmead recycling centre according to the most recent compositional analyses, from 2019. At Longshot Lane this figure is even greater at almost 17% and rigid plastics are the most abundant material, by weight, in the residual waste stream at this site.
- 5.21 In January 2019, Officers reported to the Joint Waste Disposal Board that the costs of the options identified at that time were believed to be prohibitively expensive and that the long-term markets were too unstable.
- 5.22 However, Officers have continued to keep the markets under review as proposed, and a suitable option has now been identified. This option will enable rigid plastics from the re3 partnership to be processed within the UK. A small amount of compaction is also permitted to the waste. This will enable the haulage of the material to be more cost effective under this arrangement.
- 5.23 Officers have agreed to a trial being undertaken at both re3 recycling centres so that the costs and benefits of this service can be fully assessed.
- 5.24 Items that it will be possible to recycle via this trial will include storage containers, buckets, plastic patio furniture, gutters and drainpipes and large children's garden toys. Brittle plastics, rubber, fibreglass and upholstered plastics are amongst items it will not be possible to recycle at this time. The trial will therefore enable the partnership to establish the quantity of waste that can be diverted from landfill and the input needed in order to meet the quality requirements of the offtaker.
- 5.25 At the time of writing this report, Officers are in the process of planning communicational activities in support of the trial and it is anticipated that the trial will commence in early July. If it proves to be successful, it is hoped and expected that this can become a permanent service for residents.
- 5.26 Officers will continue to keep Members informed as the trial progresses and

recommend that an update is requested for the next meeting, in September.

Climate Change

- 5.27 Each of the re3 partner councils has made purposeful commitments to take action to reduce their carbon emissions and previous reports presented estimates, using Government maintained conversion factors, of the direct impact of waste treatment.
- 5.28 Using metrics developed by WRAP - The Carbon Waste and Resources Metric (Carbon WARM) and re3 disposal data, re3 Project Team can showcase Greenhouse Gas emission impact, measured as carbon dioxide equivalent (CO₂e) to supplement traditional weight-based monitoring.
- 5.29 An online calculator that shows how recycling of single household items ie. aluminium can, plastic bottle or cereal box can contribute to efforts in combating a climate change will be added to the re3 website.
- 5.30 Using this tool, residents can see how much CO₂e can be saved by recycling and will learn how this amount of CO₂e relates to the number of cars taken off the roads.
- 5.31 These calculations will be used to develop recycling awareness messages within a wider focus on the environment and practical steps that residents can take.

6 COMMUNICATIONS

Advertising

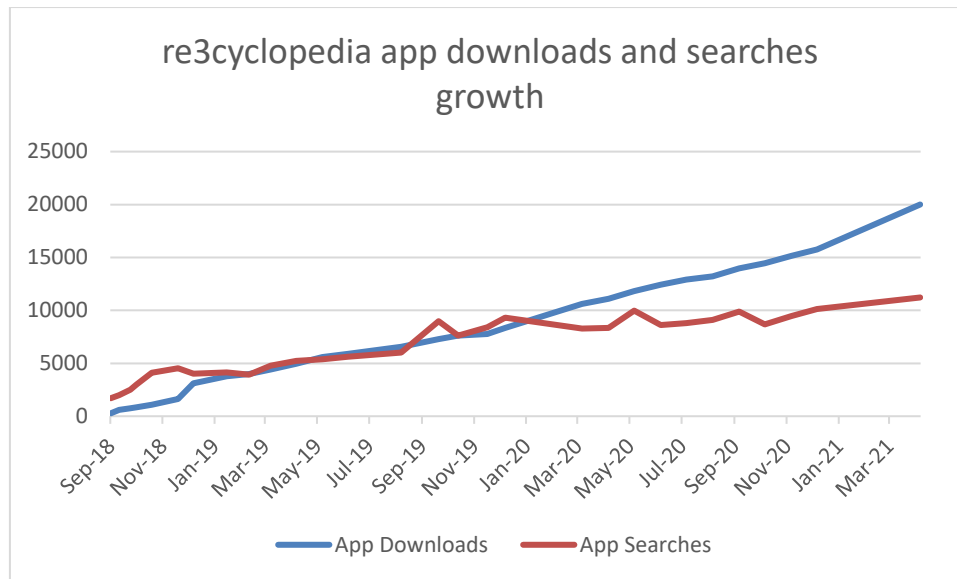
- 6.1 Adverts with a food waste theme were placed in residents' magazines which are being distributed across each of the Boroughs during spring and summer months.
- 6.2 An advert features the benefits of the food waste recycling process, with a focus on energy production.
- 6.3 A series of social media assets, with a similar theme, are being developed and will be shared with the Councils for their use.

re3cyclopedia app

- 6.4 The re3cyclopedia app have seen a rapid growth of its users in the period of last 12 months, as shown in the graph below. Since April 2020, the cumulative number of downloads has almost doubled reaching 20,002 by the end of April 2021.
- 6.5 Since the beginning of the 2021, the number of searches is consistently above 10,000 per month.
- 6.6 Each month, over 70% of app users also accessing other waste and recycling Council information or use the app as a fast-track access to the Click & Tip booking system. This suggest that the app is now being used for many purposes, not just the re3cyclopedia waste item search.
- 6.7 A development of a product barcode scanning feature – the first of its kind anywhere in the UK is at the final – beta testing stage.
- 6.8 The upgraded app will work by scanning and recognising a product from the manufacturer/retailer database, then performing an automated lookup in the app database of products and returning the correct recycling information for that product to

the end user broken down by component part.

- 6.9 Material recycling information does not generally exist in manufacturer/retailer barcode databases. Due to lack of this information, the process of inputting the barcodes to the back end of the app and matching it with the re3 database is manual.
- 6.10 The re3cyclopedia database currently contains more than 11,000 products and so far, the scanned barcode information has been matched to over 3,000 popular items within the re3 recycling database.
- 6.11 The upgrade will be available to all users by late summer/early autumn 2021.



7 ADVICE RECEIVED FROM ADMINISTERING AUTHORITY

Head of Legal Services

- 7.1 None for this report.

Corporate Finance Business Partner

- 7.2 None for this report.

Equalities Impact Assessment

- 7.3 None.

Strategic Risk Management Issues

None

8 CONSULTATION

Principal Groups Consulted

Not applicable.

Method of Consultation

Not applicable.

8.3 Representations Received

Not applicable.

Background Papers

October 2020 re3 Board

Contacts for further information

Sarah Innes, re3 Monitoring and Performance Officer
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Monika Bulmer, re3 Marketing and Communications Officer
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APPENDIX 1 – WASTE STATISTICS**Bracknell Forest**

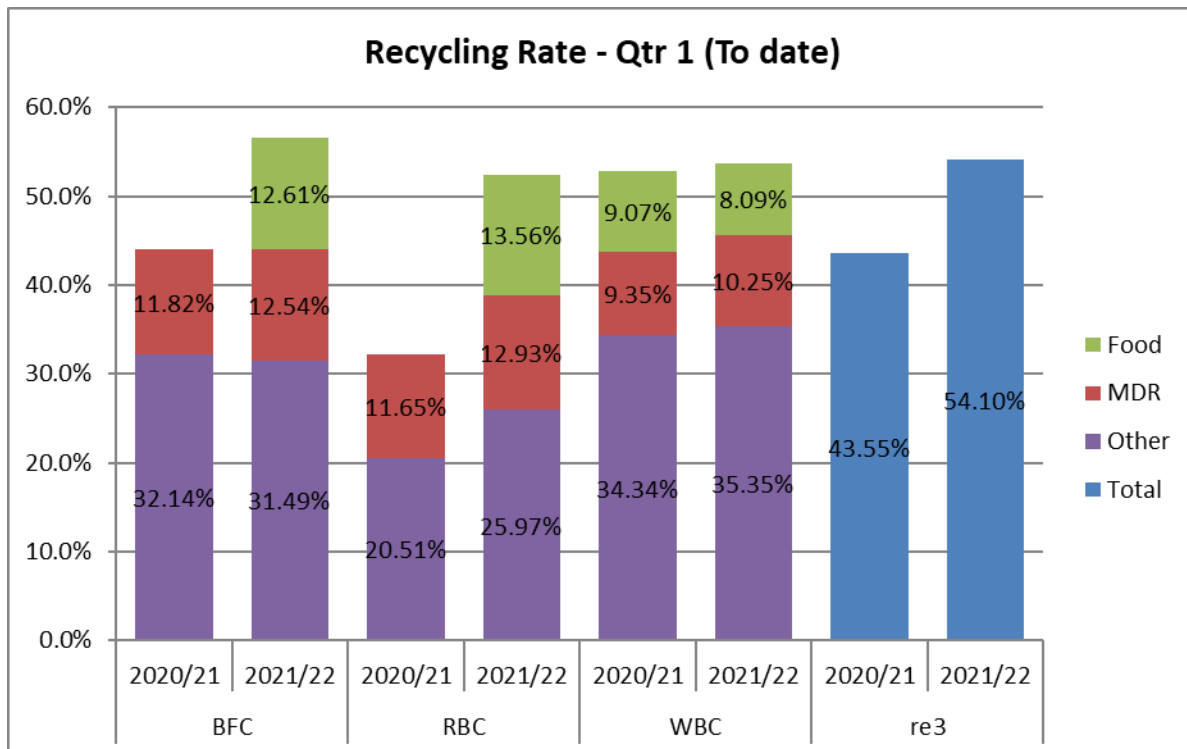
Category	Background	Cumulative Performance			
		April 2021/22		April-June 2020/21	
C1A Statutory Recycling Target	This target is the traditional 'recycling rate' target that should be comparable with other councils in the UK.	56.64%		43.96%	
C1B Kerbside Recycling	Using the respective weekly council kerbside collections is an effective way to recycle. This indicator looks at this service alone.	37.42%		29.45%	
C1C Including Incinerator Bottom Ash (IBA)	<i>Despite displacing 'virgin' materials, the recycling of IBA into building blocks is not yet counted as 'recycling' by the Government. Nonetheless, re3 recognises the value of this activity.</i>	7%		8%	
C1E Contamination	<i>Contamination is the term used to describe items which are not supposed to be present within recyclables. The level of contamination is, therefore, an indicator of the effectiveness of waste collection arrangements. It also has an impact on recycling because at high levels of contamination it can become harder to separate 'good' recyclables from the unwanted items.</i>	Target	84.91%	Target	84.56%
		Non Target Paper and Card	6.43%	Non Target Paper and Card	6.55%
		Other Non-Target and Non-Recyclable Material	8.66%	Other Non-Target and Non-Recyclable Material	8.88%

Reading

Category	Background	Cumulative Performance			
		April 2021/22		April-June 2020/21	
C2A Statutory Recycling Target	This target is the traditional 'recycling rate' target that should be comparable with other councils in the UK.	52.46%		32.16%	
C2B Kerbside Recycling	Using the respective weekly council kerbside collections is an effective way to recycle. This indicator looks at this service alone.	35.52%		21.80%	
C2C Including Incinerator Bottom Ash (IBA)	<i>Despite displacing 'virgin' materials, the recycling of IBA into building blocks is not yet counted as 'recycling' by the Government. Nonetheless, re3 recognises the value of this activity.</i>	10%		11%	
C1E Contamination	<i>Contamination is the term used to describe items which are not supposed to be present within recyclables. The level of contamination is, therefore, an indicator of the effectiveness of waste collection arrangements. It also has an impact on recycling because at high levels of contamination it can become harder to separate 'good' recyclables from the unwanted items.</i>	Target	84.54%	Target	78.58%
		Non Target Paper and Card	1.10%	Non Target Paper and Card	2.96%
		Other Non-Target and Non-Recyclable Material	14.36%	Other Non-Target and Non-Recyclable Material	18.46%

Wokingham

Category	Background	Cumulative Performance			
		April 2021/22		April-June 2020/21	
C3A Statutory Recycling Target	This target is the traditional 'recycling rate' target that should be comparable with other councils in the UK.	53.68%		52.76%	
C3B Kerbside Recycling	Using the respective weekly council kerbside collections is an effective way to recycle. This indicator looks at this service alone.	33.30%		38.34%	
C3C Including Incinerator Bottom Ash (IBA)	Despite displacing 'virgin' materials, the recycling of IBA into building blocks is not yet counted as 'recycling' by the Government. Nonetheless, re3 recognises the value of this activity.	8%		8%	
C1E Contamination	Contamination is the term used to describe items which are not supposed to be present within recyclables. The level of contamination is, therefore, an indicator of the effectiveness of waste collection arrangements. It also has an impact on recycling because at high levels of contamination it can become harder to separate 'good' recyclables from the unwanted items.	Target	90.31%	Target	80.75%
		Non Target Paper and Card	0.35%	Non Target Paper and Card	7.63%
		Other Non-Target and Non-Recyclable Material	9.34%	Other Non-Target and Non-Recyclable Material	11.63%

APPENDIX 2 – BREAKDOWN OF RECYCLING RATE

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TO: JOINT WASTE DISPOSAL BOARD
17th June 2021

REVIEW OF RECYCLING CENTRE BOOKING SYSTEM **Report of the re3 Project Director**

1 INTRODUCTION

- 1.1 The purpose of this report is to brief the re3 Joint Waste Disposal Board on access options for the re3 recycling centres.

2 RECOMMENDATION

- 2.1 **That Members endorse one of the options for access to the re3 recycling centres, presented from 5.10.**

3 ALTERNATIVE OPTIONS CONSIDERED

- 3.1 N/A

4 REASONS FOR RECOMMENDATION

- 4.1 The purpose of this report is to present options for consideration.

5 PROGRESS IN RELATION TO WASTE MANAGEMENT

Review of Booking System

- 5.1 Members have supported the retention of the recycling centre booking system during the COVID-19 pandemic in order to provide clarity in communications for site visitors, as well as certainty for other council services and support for neighbouring businesses. At the JWDB meeting of January 2021, Members requested that future access options be considered. This report sets out relevant data and considerations related to the booking system and presents three different options which could be implemented as COVID restrictions on social-distancing are lifted.
- 5.2 The booking system was introduced to minimise the formation of queues which may have resulted from the 'one in, one out' policy; used to help maintain social distancing at the recycling centres. Some of the benefits of managing the flow of residents arriving at the recycling centres are set out below.
1. The re3 Partnership has helped ensure that access to the co-located waste transfer stations has not been restricted by queuing vehicles and that the delivery of other public services was not delayed. This has been critically important in supporting waste collection and recycling for the three councils as:
 - a. During 2020/21 and the course of the pandemic, council collected tonnages increased by 16%, and prompt turnaround times were important, and;
 - b. The recent changes in waste collection at two councils, have further increased the number of council vehicles using the sites.
 2. There has been vastly improved access for owners and customers of neighbouring businesses, helping to address a long-term issue at Longshot Lane in Bracknell. Limiting the impact of the re3 facilities in this way, compared to previous conditions, helps to foster good relationships and has undoubtedly been valued by local

businesses during an already complicated period of trading.

3. By seeking to ensure that large numbers of residents do not arrive at the recycling centre at once, we have helped to reduce the idling of cars caused by queuing at the sites. This has potential benefits in terms of the carbon emissions caused by prolonged queueing.
4. During the user satisfaction survey, conducted in December 2020, 64% of respondents at Smallmead and 65% of respondents at Longshot Lane said they made their visit to the sites more efficient as a result of needing to book. In the period between June and December, visitor numbers at Smallmead were 43% lower in 2019 than they were in 2020, whilst tonnages were only 16% lower. During the same period at Longshot Lane visitor numbers were 50% lower but tonnages were only 18% lower. This is in stark contrast to some other sites, where public order issues have been experienced and Police attendance has been required.

5.3 A range of other benefits have also been experienced whilst utilising the booking system. These are as detailed below:

5. The recycling rate at both recycling centres increased during the time in which the booking system was in place. The provisional recycling rate in 2020/21 was 77.6% at Smallmead and 72.0% at Longshot Lane. This compares to 74.2% and 71.6% in 2019/20, respectively. Relevant factors may include more time for residents to prepare for visits (including packing the vehicle and segregating waste) and greater access to site staff.
6. The provision of contact details during the booking process has enabled re3 to make contact with residents who are expected to visit in cases where the recycling centres have had to close in emergency circumstances. This helps to ensure that residents do not need to make unnecessary trips to the site and can help keep access clear for the emergency services.
7. Residents can confirm whether they are happy to receive e-newsletters and important announcements from the re3 partnership via the email address they use for their booking. Being able to seek consent in this way has helped to increase distribution of the re3 newsletter from around 500 subscribers before the introduction of the booking system to about 25,000 in March 2021.

5.4 The re3 Partnership are also expecting the booking system to be upgraded during June 2021. The addition of an address look-up function to the webform should lead to the following additional benefits:

8. Residency in the re3 area is currently assessed by meet and greet staff upon a resident's arrival at the re3 recycling centre. Whilst staff have developed good recognition for re3 postcodes, the addition of an address look-up function should help to reduce an element of human error and give the staff more time to focus on other checks and provide important information to the residents. More accurate identification of re3 residents will further help to ensure that re3 residents are not covering the cost of waste disposal from elsewhere.
9. Patronage of the re3 recycling centres has historically been assessed based on data obtained during an annual user satisfaction survey. The introduction of an address look-up function will allow allocation of tonnages and costs to be based on full usage data, rather than an annual survey conducted over a couple of weeks.

5.5 re3 Officers have met with the booking system hosts (JRNI) and the re3 Contractor to discuss future options that would be available to the Partnership in the event that a booking system is maintained. Some of these are as set out below:

10. The retention of the booking system would enable the partnership to consider operating parallel booking systems alongside the one for re3 residents. This may

offer options to maximise the potential of the facilities, whilst protecting the statutory service for residents. For example, it could be possible to have a separate trade waste system, with a limited number of slots set aside for local businesses, to help facilitate the expansion of this service. Alternatively, the partnership may want to consider limited access for residents outside of the re3 area, as a way of discouraging fly-tipping.

11. It could be possible to take payments for some chargeable products or services via the booking system, thereby speeding up access for residents when arriving at the recycling centres. Whilst not currently recommended for non-household waste types (which are assessed by HWRC staff for consistency) it may be possible to take payments in advance if the Councils were to introduce an access charge for visitors from outside the re3 Partnership, or for bags of compost.
12. The booking system may help the re3 Partnership to identify frequent users, whose usage may suggest activity more like that of a trader (potentially depositing waste illegally, and at the tax payer's expense) rather than a householder. In the past, data relating to usage of commercial vehicle permits has been analysed via a manual process. JRNI have confirmed that they will be able to automate some or all of this process. The booking system can also be linked to Automatic Number Plate Recognition (ANPR) and the Partnership could consider investment in this in the future, subject to clarification of the practical and operational benefits.
13. The ability to tailor the number of visitors present in the recycling centre at any one time, could help to minimise disruption to residents caused by activities such as ad-hoc maintenance, or the need to conduct a 'push up' of waste at Longshot Lane, such as in high-Summer, when lots of garden waste has been delivered.

5.6 Alongside the benefits, there have also been some perceived difficulties with operating a booking system. These are set out below, alongside the actions that have been taken to mitigate against them, where appropriate.

1. During the pandemic a limit on the number of available slots has been necessitated by the need to comply with social distancing guidelines at the recycling centres. At times of high demand, this may sometimes have led to residents booking a slot that was not preferred or booking further ahead than they would have liked. Officers managed the number of slots available, in consultation with the Contractor, to ensure that additional slots were released where these could be accommodated safely.
2. As with most online systems, a few technical issues have been experienced with the booking system. Officers have worked closely with JRNI to ensure that these have been quickly resolved.
3. In order to operate the booking system, the re3 Partnership require all users to provide some limited personal information including name, address and email address. The quantity of information requested is kept to a minimum in line with General Data Protection Regulations (GDPR) requirements and this is handled in line with the Data Privacy Notice, which is publicly accessible online.
4. In order to enable booking details to be easily and safely transferred to Meet and Greet staff at the recycling centres, all bookings for the re3 sites must be made online, via the appropriate form. In order to make the booking system accessible to residents without access to the internet, the customer services teams at all three councils are able to make bookings on behalf of these residents, over the phone.
5. Some users have associated the recycling centre booking system with an increased level of fly-tipping. Officers have monitored levels of fly-tipping and no association between fly-tipping and the introduction of the booking system (from May 2020) can be determined from the available statistics (Appendix 1).

Options

- 5.7 Before considering the options available, Officers sought advice from the Chartered Institution of Wastes Management (CIWM) about any restrictions that may be implemented on the use of booking systems once COVID restrictions are lifted. The CIWM advised that DEFRA and the Local Government Association (LGA) had both advised that the use of booking systems is for individual authorities to decide.
- 5.8 Alongside this, Officers received confirmation from the Reading Borough Council Data Protection Team that re3 can continue make provision of limited personal information (name, address and email address) mandatory when the use of booking system is no longer necessitated by social distancing.
- 5.9 In light of this information and the review above, re3 Officers have consulted with the Contractor in relation to the options available. Three options for Member consideration are set out below.

Option 1 – Removal of the booking system

- 5.10 Option 1 would see a return to pre-COVID access arrangements.
- 5.11 Complete removal of the booking system would have advantages and disadvantages. On one hand residents would have the freedom to visit the recycling centre at a time that suited them, without needing to provide their personal details in advance. On the other hand, we now have experience of a system which genuinely provides certainty over a residents' visit. With removal of this system, queueing, as a result of many visitors arriving at the sites at the same time (particularly on Bank holidays or throughout periods of good weather) would once-again be more likely. This will make current and future usage of Island Road and Longshot Lane harder for neighbouring businesses. There would also likely be a return to periods of under utilisation at the sites and the other advantages of the booking system (such as the patronage data, ID validation and additional communication tools) would be lost.
- 5.12 The peaks and troughs in visitor numbers, as seen before the introduction of the booking system, are clearly visible within the graph at Appendix 2.

Option 2 - Retention of the booking system, with current profiling and additional slots

- 5.13 Throughout the pandemic, Officers have sought to maximise access to the HWRCs, to operate efficient reception of waste from council collections and to minimise the impact of the sites on neighbouring businesses though profiling the available bookings. The profiling of bookable slots reflects the busiest periods at the transfer stations, the risk of queueing before the sites open, peak access times for neighbouring premises and Contractor experience.
- 5.14 Appendix 3 shows how profiling in this manner has enabled numbers of bookings to be tailored to the operating conditions, whilst smoothing the large peaks and troughs that were seen previously.
- 5.15 As noted at 5.6 above, the limit on the number of available slots has been necessitated by the need to comply with social distancing guidelines at the recycling centres. However, with the relaxation of social distancing rules, additional slots could be opened across the week, to allow residents more choice over when to book.
- 5.16 Any lasting impact on residents' requirements for visiting the recycling centres, caused by COVID 19 (both from changes in lifestyle and the operation of a recycling centre booking system for a significant period of time) is as yet unclear. However, Officers would not propose to a return to pre-pandemic levels of visits.

- 5.17 Instead, Officers in consultation with the Contractor (who is responsible for site safety and the receipt of waste from the various sources), would seek to progressively increase bookable slots to reach an optimised but practically operable level.
- 5.18 The exact numbers of bookings would need to be carefully managed. Too many bookings in the system, at one time, could still lead to queues (and associated access issues) during some periods. As the restrictions of social-distancing are being relaxed, Officers would propose to continue to amend the profiling in a cautious and gradual way in order to maximise the benefits from this scheme *and* increase accessibility to the facilities.

Option 3 - Retention of the booking system, with weekday profiling and additional weekend slots

- 5.19 Under Option 3, the re3 Partnership could retain booking-slot profiling during the working week (Monday to Friday) similar to the numbers currently available, in order to maintain easy access for other service users. At the weekend, from 1pm on Saturday and throughout Sunday, a larger number of bookable visits would be scheduled. As shown in Appendix 2, the weekend has historically been the most popular time for residents to visit the re3 recycling centres and caters for residents who may not always be able to make a visit during the week.
- 5.20 The weekend is a period in which increased numbers of visitors can be accommodated, particularly on a Sunday. This is achievable because the other integrated facilities (such as the transfer stations) are not operational on Saturday afternoon and throughout the day on Sunday. Making use of on-site queuing measures, such as those required in the Planning Permission for Longshot Lane, mean that the impact on surrounding roads can be moderated even over busy weekend periods.

Conclusion and Recommendation

- 5.21 A summary of the three different options and the retention of the booking system benefits is presented in Appendix 4. In reference to this summary, and following discussions with other Councils and the re3 Contractor, Officers would recommend that Members request that Option 3 be implemented.
- 5.22 Officers in neighbouring Councils are not looking to remove their booking systems at this time. A third wave of the COVID-19 pandemic is predicted for Autumn/Winter 2021 and could prompt the return of social-distancing conditions. The retention of the booking system would therefore provide some clarity and consistency for users in the event that this circumstance arose.
- 5.23 But the experience of operating a booking system has also illustrated other benefits to residents, the councils and the neighbours of the two re3 HWRCs, as this report has illustrated.
- 5.24 Officers therefore propose that the JRNI system would be renewed in November 2021 (on expiry of the current agreement) and run until the following November, ahead of which the retention of the scheme could be reviewed again.
- 5.25 Officers will implement the Member decision on this matter, subject to any further comments from the Contractor. If the decision is made to retain the booking system under Option 3, Officers would recommend that increased numbers of bookings are trialled at the weekend and then formalised following a review.

- 5.26 If the booking system is retained, Officers would also propose that the limits on certain types of waste, which set out the number of items which can be deposited of at the recycling centres, per trip, be revised. A revision, as per the table in Appendix 5, would help residents to continue to make their visits to the site more efficient.
- 5.27 Officers would, as with other services, continue to monitor the booking system operation and propose improvements and amendments to the re3 Board, so the re3 Partnership can continue to respond to any further changes in our operating conditions. Officers would also continue to keep the number of slots under review, as per the current arrangements.

7 ADVICE RECEIVED FROM ADMINISTERING AUTHORITY

Head of Legal Services

- 7.1 None for this report.

Corporate Finance Business Partner

- 7.2 None for this report.

Equalities Impact Assessment

- 7.3 None.

Strategic Risk Management Issues

- 7.4 None.

8 CONSULTATION

8.1 Principal Groups Consulted

Not applicable.

8.2 Method of Consultation

Not applicable.

8.3 Representations Received

Not applicable.

Background Papers

October 2020 re3 Board

Contacts for further information

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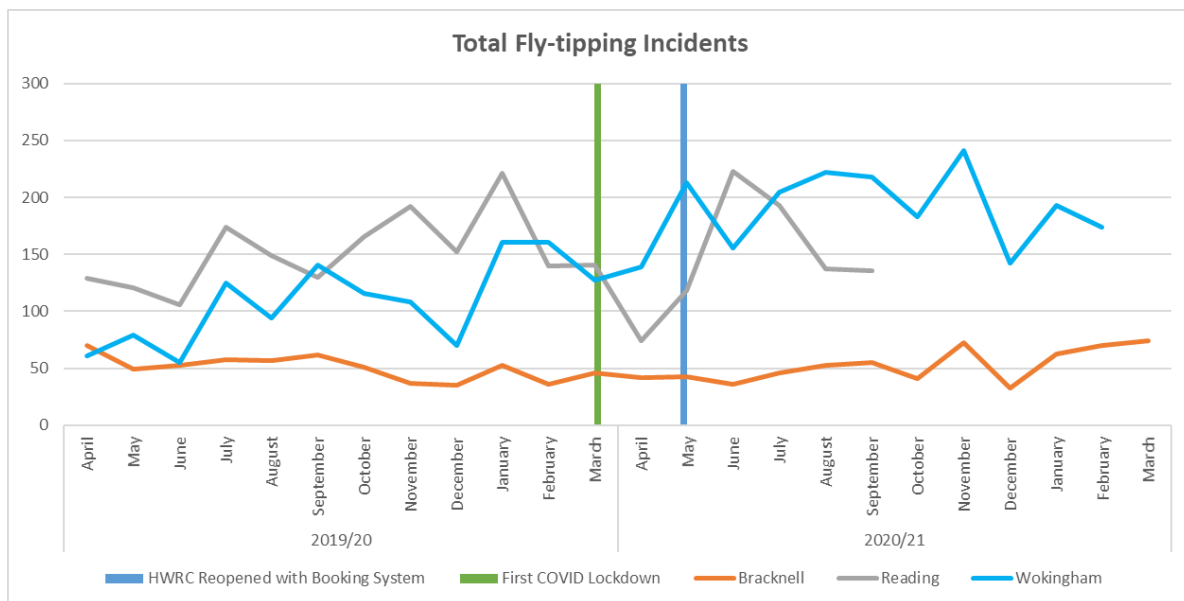
Oliver Burt, re3 Project Director
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APPENDIX 1 - Fly-tipping Data

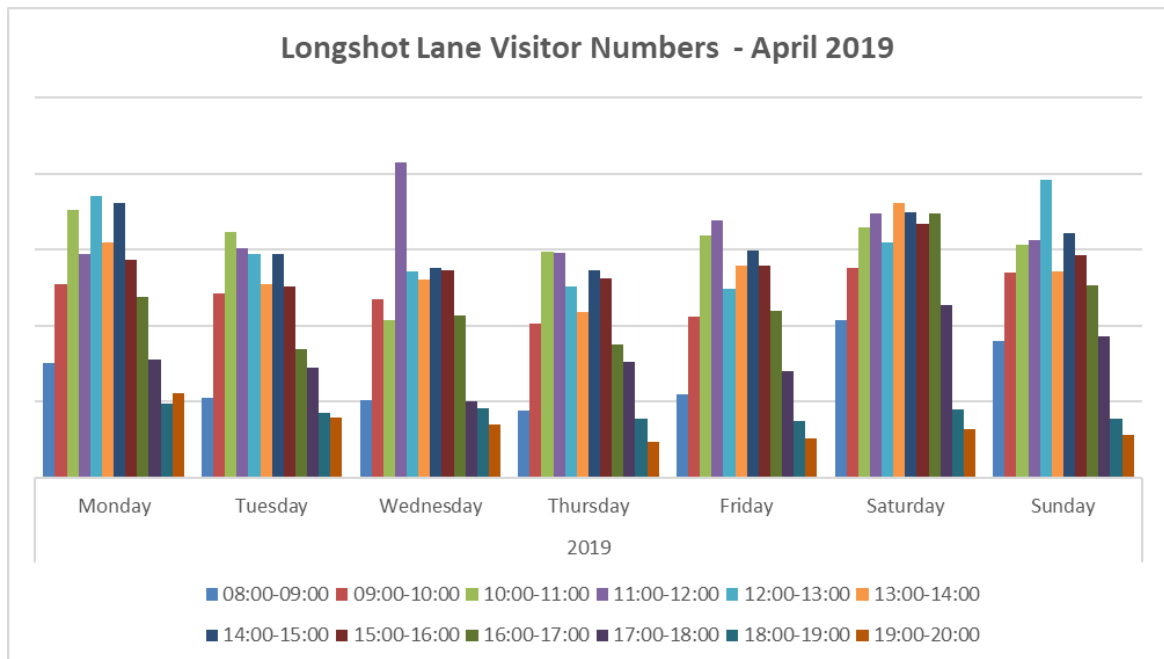
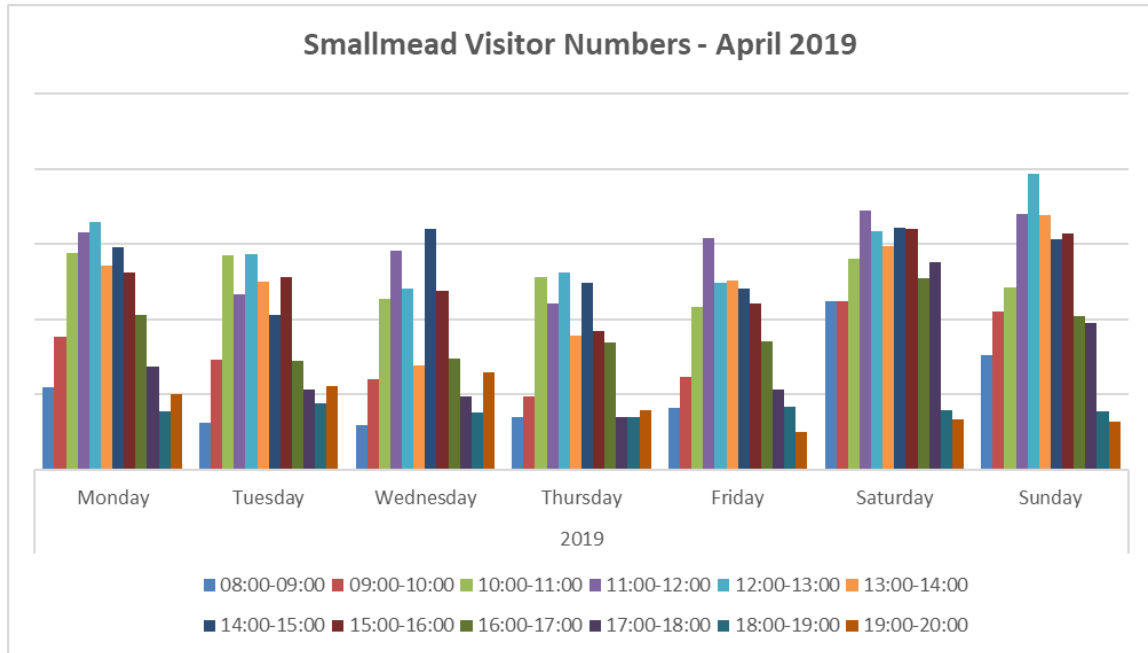
The graph below shows the total number of fly-tip incidents under all reporting categories. As the category of fly-tipping is often reported by a variety of stakeholders and relating to a variety of standards (and can therefore vary from case to case), all instances of flytipping have been reported. The graph therefore represents fly-tips of both commercial and household origins.

It is not easy to draw clear conclusions from the data. There has been an increase in the number of instances of fly-tipping in Wokingham and Reading but, from the graph, both appear to have commenced before lockdown and may be coming to an end. In the case of Bracknell Forest, levels of fly-tipping are relatively low and constant. It may be helpful to understand, in greater detail and from the councils themselves, what is behind these statistics.



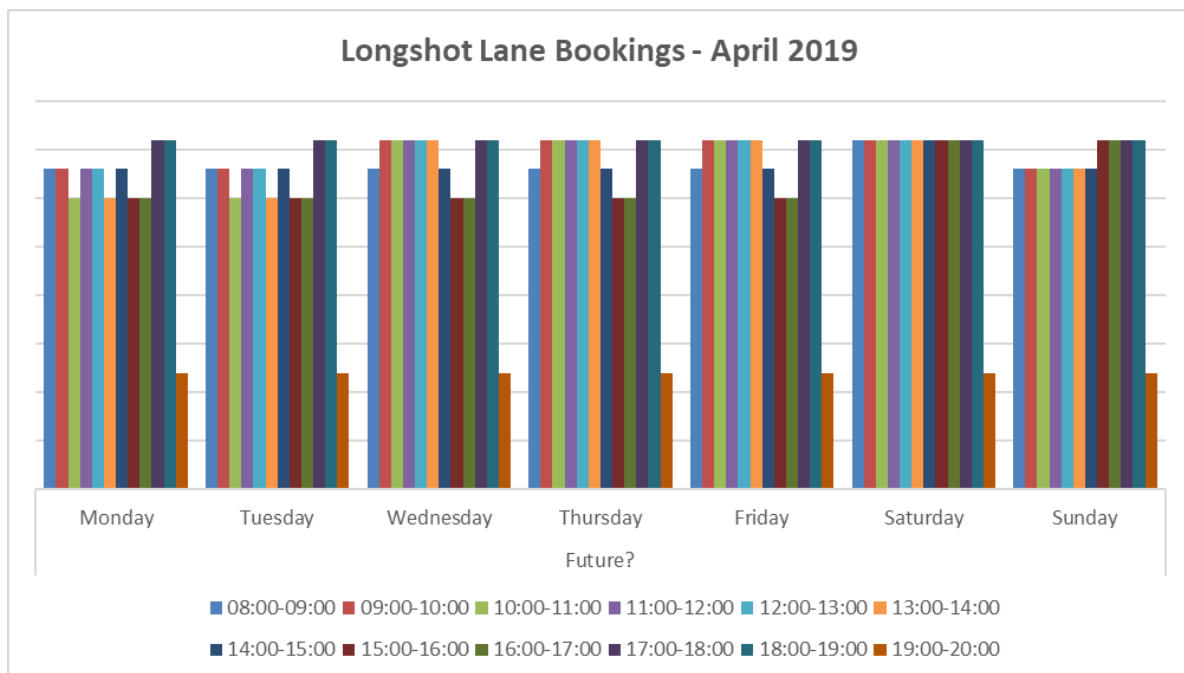
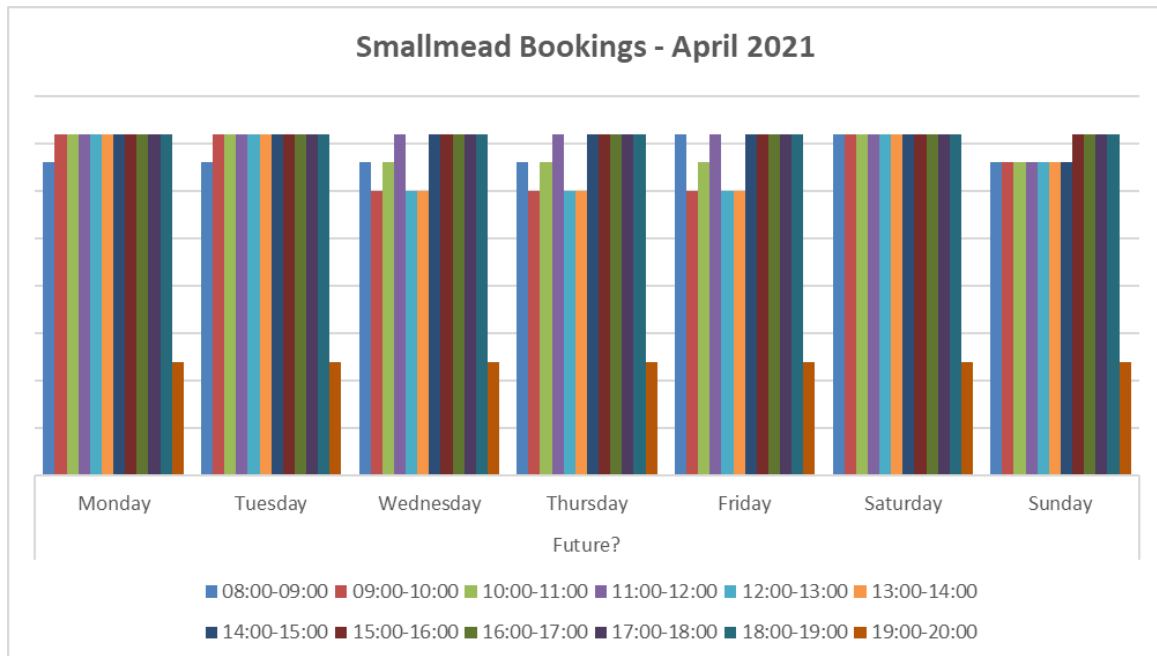
APPENDIX 2 – Option 1

The graphs below show the fluctuation in visitor numbers per day and per hour in April 2019 (when no booking system was in operation at the recycling centres).



APPENDIX 3 – Option 2

The graphs below show the level of available bookings per day and per hour in April 2021. These can be contrasted with the graphs presented in Appendix 2. (The 19:00 – 20:00 period is lower than the others as the sites are currently only open until 19:30 to allow for additional cleaning).



APPENDIX 4 – Review of Benefits

The table below represents a summary of the options presented in this report, in comparison to the current operation (where all the advantages would be shown in green and all the disadvantages in red).

KEY	ADVANTAGES	DISADVANTAGES
Red	Minimised	Maximised
Orange		
Green	Maximised	Minimised

Factors		Option 1 – Removal of Booking system	Option 2 – Retention of booking system with additional slots	Option 3 – Retention of booking system with additional weekend slots
Advantages	1 – Easier access to Transfer Stations			
	2 – Easier access to Neighbouring Businesses			
	3 – Reduced idling of cars			
	4 – More efficient visits			
	5 – Increased access to staff/vehicle preparation			
	6 – Communication during site closures			
	7 – Increased circulation of re3 newsletter			
	8 – More accurate identification of re3 residents			
	9 – Patronage analysis			
	10 – Parallel booking systems			
	11 – Payments in advance			
	12 – Identification of frequent users			
	13 – Scheduled maintenance			
Disadvantages	1 – Reduction in resident choice			
	2 – Possibility of technical issues			
	3 – Retention of			

	Personal data			
	4 – Requirement for online bookings			
	5 – Perception of fly-tipping			

APPENDIX 5 – Limits per Trip

Material	Current Limit	Proposal if Booking System is retained
Fridges and Freezers	Any domestic fridge or freezer, up to the maximum size of an American style upright fridge can be brought to site.	No change
Paint	Up to 5 litres of paint.	Remove limit
Engine Oil	Maximum of 5 litres.	Remove limit
Animal and Pet Waste	Maximum of 2 bags from domestic animals only. Waste from livestock and stabling is not accepted.	No change
Hazardous Household Waste	Up to 2 litres of chemicals.	Remove limit
Fluorescent Tubes and Light Bulbs	Maximum of 10 tubes or bulbs.	Remove limit
Tyres	Maximum of 4 car tyres.	No change
Fire Extinguishers	Maximum of 2 per household (Up to and including 2kg/3L only).	No change

Where it has been proposed that a limit be removed, staff will monitor the deposits to continue to ensure that trade waste is not deposited at the tax-payer's expense.

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TO: JOINT WASTE DISPOSAL BOARD
17th June 2021

re3 STRATEGY REPORT **Report of the re3 Project Director**

1 INTRODUCTION

- 1.1 The purpose of this report is to brief the re3 Joint Waste Disposal Board on progress in the delivery of the renewed re3 Strategy.

2 RECOMMENDATION

- 2.1 That Members endorse the contents of the draft re3 Strategy, appended to this report.
- 2.2 That Members agree the processes of internal, stakeholder and public consultation, as described between paragraphs 6.1 and 6.8.
- 2.3 That Members request that final draft of the re3 Strategy, amended to appropriately reflect the content received in the consultations above, is brought back to an appropriate JWDB meeting for Member approval, before the end of the 2021/22 council year.

3 ALTERNATIVE OPTIONS CONSIDERED

- 3.1 None for this report.

4 REASONS FOR RECOMMENDATION

- 4.1 The purpose of this report is to brief Members on progress made since the last re3 Board meeting, after which Members identified strategic imperatives for each council.

5 Re3 STRATEGY

Background

- 5.1 The re3 Partnership has maintained a strategy since 2016. Key strategic aspirations, of the re3 partnership, have initially been reflected in the shared strategy, such as the following examples:
- Food waste processing
 - Processing 'mixed' plastics (pots, tubs and trays)
 - Trade waste receipt at the HWRCs
- 5.2 At the January 2020 re3 Board meeting, Members requested the preparation of a strategic pathway for the re3 partnership.
- 5.3 The Covid-19 pandemic has delayed progress in developing the strategic pathway. Nonetheless, at each re3 Board meeting in 2020, Members received strategic briefings, building towards the meeting in January 2021, after which Members recorded their strategic aspirations as individual councils and as partners.
- 5.4 The accompanying briefing includes a short analysis of the data collected from Board Members. Alongside the data from Members, the briefing sets out a first draft strategy for the partnership, which also reflects the emerging legislative environment and the re3 council's respective climate change commitments.

re3 Strategy

- 5.5 The Draft re3 Strategy is directed at addressing the following imperatives:
- Making a key contribution to the delivery of national and local climate change commitments.
 - Managing the financial impacts associated with waste.
 - Delivering compliance with, and best outcomes from, new legislation and statutory guidance.
 - Ensure that, alongside the national requirements listed above, the re3 waste management service continues to engage purposefully with, and make a positive difference for, our residents and businesses.
- 5.6 The strategy is organised around five themes, which emerged from the data provided by Members in their council-specific strategy sessions, in January 2021. The themes are:
- A. Climate Change
 - B. Waste Collection
 - C. Waste Management
 - D. Innovative Partnership
 - E. Communication
- 5.7 **Climate Change** reflects the commitments made by each council during 2019 in their respective recognition of the need to address greenhouse gas emissions and make climate change adaptations between 2030 and 2050. The draft strategy reflects how, earlier this year, Government committed to speeding-up its reduction in UK greenhouse gas emissions.
- 5.8 **Waste Collection** was a notable as a service area in which Board-Members identified strategic aspirations. As a service with high levels of resident recognition, waste collection is a challenging service area to incorporate in a strategic sense, but it is also a key area in forthcoming legislation, via the Environment Bill. It's inclusion in the re3 strategy will enable the councils to support one another and exercise their Unitary (higher-tier) status.
- 5.9 **Waste Management** relates to the processing of waste collected by the councils and delivered by residents. This service area will also be significantly impacted by aspects of the Environment Bill and is of crucial importance to the re3 councils as it is through this service that waste and recycling outcomes are ultimately determined.
- 5.10 **Innovative Partnership** reflects the aspirations of re3 Board Members for the councils to work together in developing new and effective ways of working. This theme recognises that changes in population, demographics, waste composition are inevitable and that ways of working, waste treatment and our exploitation of commercial opportunities will be essential.
- 5.11 The continuing need for effective **Communication** was identified by re3 Board Members in activities such as education, behaviour change and aspects of enforcement - all of which also relate to the Environment Bill. The re3 partnership has a unique and creative voice which must continue to supplement council specific messaging.

6 NEXT STEPS

Consultation

- 6.1 Subject to the endorsement of the draft strategy, by the re3 Board, it is recommended that further consultations are undertaken before a final version is brought back to the re3 Board for approval.

- 6.2 Consultations and contributions should, as a minimum, be sought from:
1. The councils (e.g. relevant service teams)
 2. Contractors to the councils (e.g. those who will need to provide info, or comply)
 3. Residents
- 6.3 The first two elements of the consultation (councils and contractors) should be led by the councils themselves, recognising that consensus should be sought.
- 6.4 Objectives to which specific public consultation are recommended, have been highlighted in green, within the draft strategy.
- 6.5 The re3 Project Team recommends that the public consultation be undertaken online and that it is accompanied by some (brief and clear) educational content too. In that way, the consultation can help to both inform residents about aspects of the wider waste service and seek their input into the strategic direction of the re3 partnership.
- 6.6 Detail from the consultations and, officers anticipate, the final draft of the Environment Bill (including important detail on the Resource and Waste Strategy requirements) will be used to finalise those aspects of the draft strategy which are currently highlighted, because they require clarification or remain to be determined. This will include specific targets within the re3 Strategy.

Next Steps

- 6.7 Data from the above consultations should be collected, analysed and incorporated into a final version of the re3 Strategy which should be presented to the re3 Board before the end of the 2021/22 council year.
- 6.8 The above timetable will require the support of the respective councils and their relevant teams for the two elements of internal consultation feedback to be completed and shared in good time.

7 ADVICE RECEIVED FROM ADMINISTERING AUTHORITY

Head of Legal Services

- 7.1 None for this report.

Corporate Finance Business Partner

- 7.2 None for this report.

Equalities Impact Assessment

- 7.3 None.

Strategic Risk Management Issues

- 7.4 There is a risk that something foreseeable is overlooked in the process of preparing a new strategy. That risk can be mitigated via the process of consultation identified above. That includes consideration of this report and its accompanying briefing by Members and Officers.

8 CONSULTATION

Principal Groups Consulted

Not applicable.

8.2 Method of Consultation

Not applicable.

8.3 Representations Received

Not applicable.

Background Papers

October 2020 re3 Board

Contacts for further information

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DRAFT re3 STRATEGY

[**Please note:** this is a draft strategy document. **Items highlighted in yellow** denote expected conditions which have yet to be agreed (nationally or locally) or matters upon which the councils have discretion and which will be determined within a final adopted strategy]

Following the January 2021 re3 Board meeting, separate sessions, for each council, were held. The sessions were directed at capturing the aspirations of senior stakeholders, across the re3 partnership and related to the wider waste service. The output from these sessions forms the first of four principal sources, listed in the table below, from which the re3 Strategy will be derived. This Progress Briefing describes progress, to date, on the development of the Waste Strategy for the re3 Partnership.

Further detail relating to each of the four sources is included in the Appendices.

Source	Category	References / Contributors	Status
1. Senior Council Stakeholders	<i>Initiatives identified by the councils, to support residents and contribute to the effective operation of the organisations.</i>	Members and senior/waste officers – initial capture of which is reflected below.	Complete
2. Legislation/ Guidance	<i>Initiatives to ensure we remain compliant with legislation and national expectations</i>	Resources and Waste Strategy, other legislation and specific requirements upon the re3 councils.	Incomplete
3. Operational Inputs	<i>Initiatives identified from an operational/strategic perspective, prompted by understanding of current performance/market developments/ opportunities</i>	re3 Project Team and Contractor. Awaiting confirmation RWS but initial/working assumptions are reflected below.	Not yet started
4. Residents and Local Stakeholders	<i>Initiatives identified by our 'customers'</i>	Residents, businesses, charities/voluntary sector etc.	Not yet started

re3 Strategy for **[2021-2025]**

Waste management in the UK is entering an era which incorporates uncertainty alongside potential opportunity. From a council perspective, the re3 partnership, the councils as a collective and the respective individual organisations, will experience considerable change. Survival will require successful compliance with external requirements, alongside the challenge of addressing local imperatives. Over the period of this strategy, Bracknell Forest, Reading and Wokingham, waste management must deliver the following:

- Making a key contribution to the delivery of national and local climate change commitments.

- Managing the financial costs associated with waste.
- Preparing for and delivering compliance with new laws and statutory guidance, which will completely change how waste is collected and managed, in the UK.
- Ensure that, alongside the national and international requirements listed above, the re3 waste management service continues to engage purposefully with, and make a positive difference for, our residents and businesses.

Targets and objectives are organised in five categories. They are:

- A. Climate Change
- B. Waste Collection
- C. Waste Management
- D. Innovative Partnership
- E. Communication

The specific objectives and targets are detailed in the table, below, accompanied by a brief description and supplementary notes.

Further work will be required, at some point during 2021, to confirm the final details relating to Part 3 of the Environment Bill on Waste and Resource Efficiency (referred in the collective by the recognised acronym, RWS, in this document).

The table indicates ownership of each objective or target. The potential owners are listed below, with explanations.

Re3 Board	The Board established to administer the waste disposal function for the three councils.
Councils	The individual Councils of Bracknell Forest, Reading Borough and Wokingham Borough.
Waste Collection	The respective waste collection function operations teams and their providers/contractors.
Re3 Project Team	The client team for the re3 partnership and waste disposal/management function operations team.
FCC	The Contractor for the shared re3 contract.
Climate Change	The specific climate change team [where such appropriately qualified teams exist] in each council. <i>(to be directly involved in supporting the measurement and validation of relevant targets. External support may also need to be commissioned)</i>

Entries in the tables of objectives and targets, below, that are highlighted in light-green are proposed as areas of strategy upon which public consultation would be advised.

A. Climate Change

On April 22nd 2021, the Prime Minister [committed the UK to speeding-up its greenhouse gas reductions](#) (reducing to 78% of 1990 levels, by 2035). The re3 councils have each made commitments to seek carbon neutrality and, within waste as with other services, we must work at pace to ensure best use of time and to mitigate against unforeseen delays and/or obstacles. It is proposed that the councils work together to understand system-wide impacts and then to prioritise changes according to their scale, to make early progress towards net zero.

Ref		Target Date	Owner/s (actions)	Supplementary Notes
(i)	Establish Baseline of actual carbon impact (e.g. CO ₂ e) for 2019/20 of waste service per principal service activity and/or measurable.	[end 2021/22]	re3 Project Team, Climate Change, FCC, re3 Board, Waste Collection, Councils.	This work must be undertaken for the collected waste service, and address scope 1 to 3 of the [Greenhouse Gas Protocol]. re3 Project Team to commission Baseline and collate data, contributions from council services (inc. Contractors) as required. Report back to re3 Board/Councils. This will likely build-on, or supplement, existing programmes at the re3 councils.
(ii)	Using the baseline at (i) identify the relative impact of potential measures (how will we reach net zero?)	[TBD]	Councils, Climate Change, re3 Board, FCC, Waste Collection, re3 Project Team	Operational moderations will need to be given consideration, and time to be delivered. This will likely build-on, or supplement, existing programmes at the re3 councils.
(iii)	Annual assessment of carbon impact and review of targets relative to council commitments on carbon neutrality.	[subject to (i) and (ii) annual target]	Councils, Climate Change, re3 Board, FCC, Waste Collection, re3 Project Team	Operational moderations will need to be given consideration, and time to be delivered. This will likely build-on, or supplement, existing programmes at the re3 councils.
(iv)	Reduce food waste by [x%] per annum (kg/hh/wk), assessed via re3 composition analysis.	[annual target]	Councils, re3 Board, re3 Project Team	Locally, this objective could encompass reductions in household / business food waste with efforts to support food redistribution for residents. Specific project team from across the Councils to deliver reductions. re3 Project Team to undertake analysis and support Comms.

A waste management partnership between Bracknell Forest, Reading and Wokingham Borough Councils.

re3 Project Team - v1 - 09 June 2021 - Page 3 of 16

Classification: OFFICIAL-SENSITIVE

(v)	Increase proportionate capture of remaining food waste by [x%] per annum (kg/hh/wk), assessed via re3 composition analysis.	[annual target]	Waste Collection, re3 Board, Councils, re3 Project Team	Links also to financial and performance objectives. Waste Collection teams to continue day-to-day responsibility for food capture. re3 Project Team to undertake analysis and support Comms.
(vi)	As per the Waste (Circular Economy) (Amendment) Regulations 2020 municipal waste to landfill to be reduced to 10% or less of the total municipal waste generated (by weight). a. re3 council interim commitment that no more than [progressive targets of 5%/3%/<2%] waste from households sent direct to landfill by [2030 to 2035].	[annual target or 'flight-path']	Waste Collection, FCC, re3 Project Team, re3 Board, Councils.	According to the UN, 20% of anthropogenic Methane emissions come from waste management. Over the course of the re3 partnership, landfill has been targeted and recent developments mean that very low levels of landfill are now within reach. Greater capture of recyclables and food, reductions in contamination and some development of new treatment opportunities will be necessary. [At present it is not clear, from Gov't, how municipal waste will be measured and when measurement will commence. Interim objective suggested below]
(vii)	Energy generation from waste [target]	[annual target]	FCC, re3 Project Team, Climate Change, Waste Collection, re3 Board, Councils.	Linked to measuring diversion from landfill, but this target stresses what happens to the waste, rather than where it goes and should therefore provide a purposeful bridge to climate change. [favour AD over EfW] (may need to consider how mitigate against unintended incentives – avoiding crowding-out of recycling)
(viii)	Reductions in energy usage from moving and/or processing waste	[adoption of appropriate indices for targeting]	Climate Change, Waste Collection, FCC, re3 Project Team, re3 Board.	Waste Collection and haulage of collected waste is a key area for action. Efficient vehicles, proximate processing and steps to reduce the amount of processing required, can reduce impacts. This will likely build-on, or supplement, existing programmes at the re3 councils.
(ix)	Review policies for reliance on EfW, taking into account whether plants have achieved R1 ¹ status	Policy and operational objective	FCC, re3 Project Team, Climate Change, re3 Board, Councils.	R1 status reflects the energy-generating efficiency of plants. Some plants are classed as a recovery operation. Where possible, utilising such plants should support climate change objectives.
(x)	Policies which reduce idling of vehicles using or delivering waste services (and/or the	[Measures and Measurement TBD]	Councils, Climate Change, re3	Each of the re3 councils refers to idling in its respective climate change policies - though specific detail is yet to be

¹ [Defra Guide to EfW including R1 Status](#)

A waste management partnership between Bracknell Forest, Reading and Wokingham Borough Councils.

re3 Project Team - v1 - 09 June 2021 - Page 4 of 16

Classification: OFFICIAL-SENSITIVE

	impact of idling).		Project Team, FCC, Waste Collection, re3 Board,	confirmed. The recent Booking System for HWRCs is one example where queuing has been reduced, and recognised by residents, though it is difficult to measure for the purposes of comparison.

B. Waste Collection

The following targets and objectives reflect how the interface between residents and the councils, via waste collection, is a critical point, at which the cost of waste can be directly influenced (both in financial and climate terms).

Ref		Target Date	Owner	
(i)	Compliance with Resources and Waste Strategy (Environment Bill) targets [as we currently understand them]:			Individual objectives and targets listed below [a to e]
	a. Councils to collect each of 4 core waste streams [glass, paper and card, metal and plastic] in compliance Environment Bill.	[by October 2023]	Waste Collection, Councils, re3 Board, re3 Project Team, FCC.	Councils will have to collect materials not captured by a DRS, including: glass bottles and containers, all paper and card, Steel and Alu cans, foil, foil trays, jar lids, aluminium tubes, all plastic bottles, plastic pots, tubs and trays, cartons. Film (bags etc.) to be added by 2026/27.
	b. Councils to comply with weekly, separate collection of food waste.	[2024/25 at latest]	Waste Collection, Councils, re3 Board, re3 Project Team, FCC.	[All food that has become waste from households, businesses and non-domestic properties will be included.] Local authorities would be required to arrange for the weekly, separate collection of food waste for all properties including flats by the transitional end dates.
	c. [Each council to comply with requirement to offer a free garden waste collection]	[2023/24]	Waste Collection, Councils, re3 Board, re3 Project Team, FCC.	Minimum fortnightly collection, equivalent to a maximum of 240litres.

A waste management partnership between Bracknell Forest, Reading and Wokingham Borough Councils.

re3 Project Team - v1 - 09 June 2021 - Page 5 of 16

Classification: OFFICIAL-SENSITIVE

	d. Each council to comply with the [waste collection service archetypes] described within the RWS and/or the 'written assessment' (to replace TEEP).	[annual target or 'flight-path' towards compliance]	Waste Collection, Councils, re3 Board, re3 Project Team, FCC.	1. Existing dry system with addition of separate food and free garden waste collections. 2. Two stream dry system plus addition of separate food and free garden waste collections. 3. Multi-stream dry system including food and free garden waste
	e. Ensure proportionate compliance with national target to prepare for recycling/reuse 65% of municipal waste by 2035 [target years and trajectory to be established] for waste collected by the re3 councils.		Councils, Waste Collection, re3 Board, FCC, re3 Project Team	[at time of writing, it remains unclear how targets will be measured and to which stakeholders they will be applied]
(ii)	Quantity and/or financial saving target – relate it to waste composition. [Target/s] to be agreed.	[annual target]	Waste Collection, Councils, re3 Project Team, re3 Board.	Further efficiencies/savings can be achieved through better performance and effective utilisation of existing services.
(iii)	Quality (contamination) target	[target relative to most recent measurements]	Waste Collection, re3 Project Team, FCC, re3 Board	Quality targets are likely to be introduced through the Waste Collection Consistency elements of the RWS and may determine payments.
(iv)	Waste Collection efficiency via [capture/participation rate/s (to be assessed by/with the waste collection providers)].	[percentage participation and/or capture]	Waste Collection	Capture (as a measure of the amount of available material collected) and Participation (as a measure of regular participants in a collection from within a population) are valuable guides to understanding the effectiveness of a service. This information may be required through legislation but will be crucial, regardless, in assessing (and evidencing) the efficiency of collections.
(v)	Council policies (Planning, tenancy etc.) which support efficient waste collection and management.	[policies introduce, maintained or updated]	Councils, Waste Collection, re3 Board, re3 Project Team.	New developments, and those amended through change of use provisions and Permitted Development guidance, can embed high waste collection costs and negatively impact on performance. The re3 partnership could [continue to] moderate such impacts.

A waste management partnership between Bracknell Forest, Reading and Wokingham Borough Councils.

re3 Project Team - v1 - 09 June 2021 - Page 6 of 16

Classification: OFFICIAL-SENSITIVE

C. Waste Management

Identifying secure and sustainable treatments for waste will continue to be a key challenge for the re3 partnership. As legislation and markets continue to develop, it will be even more important to work together, coherently, as partners. The safe and sustainable operation of the shared facilities will also continue to be a priority, both for the receipt of waste from residents and from a range of council services.

Ref		Target Date	Owner	
(i)	[PLACEHOLDER] Compliance with RWS targets <ul style="list-style-type: none"> a. Processing material collected under 'Collection Consistency' Ref. b. Processing material collected under 'Collection Consistency' Ref. c. Processing material collected under 'Collection Consistency' Ref. 	TBC	TBC	The elements of the RWS that relate to 'Waste Collection Consistency' will have implications for the re3 partnership. When the legislation in these areas is confirmed, it will be important to recognise target dates and standards.
(ii)	[PLACEHOLDER] Compliance with RWS targets <ul style="list-style-type: none"> a. Targets/Objectives relating to Deposit Return Schemes b. Targets/Objectives relating to Deposit Return Schemes c. Targets/Objectives relating to Deposit Return Schemes 	TBC	TBC	The elements of the RWS that relate to Deposit Return Schemes will have implications for the re3 partnership. Potential involvement by Councils is not yet clarified but any opportunities must be examined and pursued. When the legislation in these areas is confirmed, it will be important to recognise target dates and standards.
(iii)	Annual User Satisfaction Survey. Overall Satisfaction rating by HWRC users ≥85%	[Annual]	FCC, re3 Project Team, re3 Board	Overall satisfaction with the HWRC service is an important indicator.
(iv)	Publish Annual Service Improvement Plan and review of previous year's Plan.	Annual	FCC, re3 Board, re3 Project Team.	The Annual Service Improvement Plan is an important document which aims to drive development of services. It is produced by

				the principal Contractor, FCC, and will be published alongside a review of the previous year [suggest FCC include within AER?]
(v)	a. Reuse targets for waste delivered to HWRCs [increase [10%] of baseline, per annum]? b. Supplementary target for reuse within [x miles of re3 area]	[Annual]	FCC, re3 Board, re3 Project Team.	Commence with a review of the range of contributors/recipients and the relative local value generated via our relationship/support of them. Retention of value within the re3 area is important, both to support local people/interests and in reducing haulage.
(vi)	Repair function for HWRCs and/or off-site?		Councils, FCC, Re3 Project Team, re3 Board.	Obsolescence is a significant factor in waste generation. If the re3 partnership can support repair initiatives, we can help reduce wastefulness and retain value locally.
(vii)	Targets relating to MRF utilisation [% of operational hours relative to scheduled/expected operational hours] [target?].	Annual	FCC, re3 Board, re3 Project Team, Waste Collection	Efficient and well-maintained plant is an important expectation. This indicator will measure availability and should ensure that the multiple factors that contribute to plant efficiency can be explored.
(viii)	Input quality of collected recyclables (level of contamination) compared with MRF outputs.	[Twice Annually]	FCC, Waste Collection, re3 Project Team, re3 Board, Councils	Comparison will illustrate the relative efficiency of the MRF in preparing material for recycling and encourage improvements in contamination (reductions) by the respective waste collection services.

D. Innovative Partnership

Some of the objectives in this section are focused on establishing and maintaining baselines, against which proposed new methods can be assessed. This will be important so we can measure the effectiveness of proposed innovations. Accordingly, there are fewer directly measurable targets and objectives, in this section, at this stage. These must follow, through the process of review, described below.

Ref		Target Date	Owner	

(i)	Annual Review Material Recycling Facility (MRF) performance (composition of inputs and outputs, processing efficiency etc.) to assess processing practices and to inform services.	[Annual]	FCC, re3 Project Team, re3 Board, Councils, Waste Collection	This process is important to ensure compliance with emerging legislation and market requirements. Innovations in MRF operation, targeting and utilisation must be explored.
(ii)	Timetabled consideration of innovations in waste collection which reflect legislative and contractual change, savings, smart procurement and collaboration.	[Commencement 2024]	Waste Collection, Councils, re3 Board.	The RWS package of changes, both in relation to service standards and payment, will ultimately harmonise waste collection to a great extent. Opportunities for further efficiencies and savings may be accessible [and may be necessitated by the legislation].
(iii)	Data – measurement and use (ref. demographics, housing growth) a. Carbon (both waste collection and waste management) b. Tonnage c. Cost	[2022/23 year]	Re3 Project Team, FCC, Waste Collection, Climate Change, re3 Board, Councils	The purpose of this objective is to develop a means of: (i) translating between different types of measurement, and (ii) supporting consistency for decision making.
(iv)	Review of current waste treatments	[Annual]	Re3 Project Team, FCC, re3 Board, Waste Collection, Councils.	The re3 Partnership has a good track-record of changing treatments to support efficiency, savings and performance enhancements. That must continue both to support higher levels of recycling and for compliance with legislation.
(v)	The re3 Project Team will commence initial, background, preparation for the end of the current re3 contract with immediate effect and in accordance with a procurement cycle model.	[2021 for initial 'background scoping'. Formal process within re3 partnership from 2024.]	Re3 Project Team, FCC, Councils, re3 Board.	Formal commencement of wider procurement process to commence during 2024. The formal process will need to incorporate early understanding of RWS changes, in operation, with the plans of the respective councils and other relevant stakeholders.
(vi)	Commercial focus on operations where a full [five case] business case supports... residents/organisations.		Re3 Project Team, Councils, FCC, Waste Collection, re3 Board.	The Resources and Waste Strategy will likely compel the treatment of Municipal Waste, meaning that household waste and commercial waste may be co-collected/co-collectable [examples].
(vii)	Review potential amendments to existing	[Annual]	Re3 Project Team,	Amendment may be necessary to comply

A waste management partnership between Bracknell Forest, Reading and Wokingham Borough Councils.

re3 Project Team - v1 - 09 June 2021 - Page 9 of 16

Classification: OFFICIAL-SENSITIVE

	Facilities/treatments.		FCC, Waste Collection, Councils, re3 Board	with new legislation, changes in waste composition and/or demographics or because of commercial opportunities. Will be recommended where a full [five case] business case supports it.
(viii)	Review development of new Facilities/treatments.	[Annual]	Councils, Re3 Board, Re3 Project Team,	Development may be necessary to comply with new legislation, changes in waste composition and/or demographics or because of commercial opportunities. Will be recommended where a full [five case] business case supports it.
(ix)	Continued focus on delivery of operational and contractual savings where options are identified.	[Annual]	Councils, re3 Project Team, Waste Collection, re3 Board, FCC.	The RWS may bring additional costs and [at time of writing, May 10, 2021] it remains unclear whether net costs will be covered. There are also likely to be opportunities to 'invest to save'.
(x)	Full review of re3 Strategy for ongoing appropriateness of targets.	[Annual]	re3 Project Team, Climate Change, Waste Collection, re3 Board, Councils, FCC.	A process of review and amendment will be required to ensure the re3 partnership can reflect relative progress and emerging imperatives in a dynamic operating environment.

E. Communication

Communication is an area in which both individual (specific and separate communications by each council) and shared activities (re3 partnership) must supplement one another. The re3 partnership must utilise, nurture and develop the locally unique platform that the partnership affords the councils, to help encourage behaviour change, normalisation of good waste practices and a wider understanding of the credibility of the services that are delivered for the councils.

Ref		Target Date	Owner	
(i)	Develop means of communicating climate change impacts to residents and other stakeholders which promote understanding and drive practical engagement.	September 2021	Re3 Project Team, Climate Change, re3 Board, Councils, Waste	Good waste practices are one of the most accessible forms of climate change mitigation. The current universality of council waste collection services provides a platform from which to introduce other, necessary messaging and guidance.

			Collection	
(ii)	RWS requirements on communications to be reflected.	October 2023	Re3 Project Team, re3 Board, Councils, Waste Collection	Localisation of the national resources will be necessary to reflect the changes that are relevant to residents. Preparing and delivering a multi-channel communication and advertising campaign to promote new information and changes to residents
(iii)	Website and e-communications improvements (both for information and FOI reasons) through planned messaging and advertising	Ongoing	Re3 Project Team, FCC	Well planned social media content and far reaching digital newsletter used to communicate partnership and industry messages. Ongoing deployment on topical and seasonal campaigns. Expanding reach organically as well as through target advertising. Using webinars to share information and messages.
(iv)	Shared partnership measurable communications indicators and targets.	Annual	Re3 Project Team, re3 Board, Councils, Waste Collection, FCC	Understanding communications indicators and targets by all partners will help to assess milestones and adjust tactics if necessary.
(v)	Understanding resident behavior to create engagement, practical messages and campaigns to help achieve waste reduction and recycling targets	Ongoing	Re3 Project Team, re3 Board, Councils, Waste Collection	Development of campaigns aim at improving participation in, and quality of, recycling and food collections. Content generated based on real-life examples, social norms, engaging imaginary and videos. Delivering messages using a plain English and avoiding terminology. Whenever possible creating materials that are accessible in multiple languages. Using existing digital tools and solutions such as re3cyclopedia app to share recycling knowledge with residents.
(vi)	Communicating the outcomes from the re3 Strategy	Annual and ongoing	Re3 Project Team, re3 Board, Councils, Waste Collection, FCC	Many of the objectives and targets contained herein should be communicated to residents and other stakeholders. In many cases, residents will be actively involved and all of the above is intended to be undertaken in the wider interests of residents.
(vii)	Promoting services especially reuse opportunities available via re3 and locally	Ongoing	Re3 Project Team, re3 Board, Councils, Waste Collection, FCC	Moving the waste hierarchy up (from recycling to reuse) would influence behavior changes and help to achieve a waste reduction target. Services available at the HWRC (such as Reuse/Donation

A waste management partnership between Bracknell Forest, Reading and Wokingham Borough Councils.

re3 Project Team - v1 - 09 June 2021 - Page 11 of 16

Classification: OFFICIAL-SENSITIVE

				area/Paint Reuse and any future initiatives ie. Reuse Pop-Up events) to be promoted on regular basis. A circular economy concept (ie. re3grow compost) to be featured in communications plans.
(viii)	Engagement with media and local community groups to achieve common goals	Ongoing	Re3 Project Team, re3 Board, Councils, FCC	Engagement with key stakeholders will strengthen re3 brand recognition and regional leadership in waste management.

APPENDIX 1 – Analysis of Data from Senior Stakeholders (collected 21/01/21)

The key items, from the separate sets of data, were arranged, over several iterations, in a thematic structure, grouping similar topics or actions together (Fig.1 and, for clarity, Fig.5).

Fig. 1

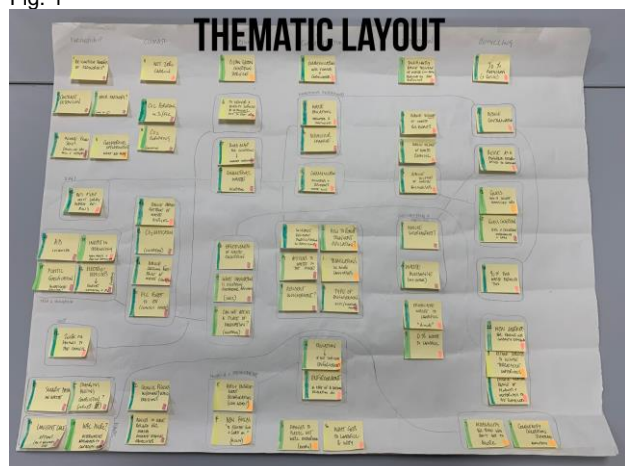
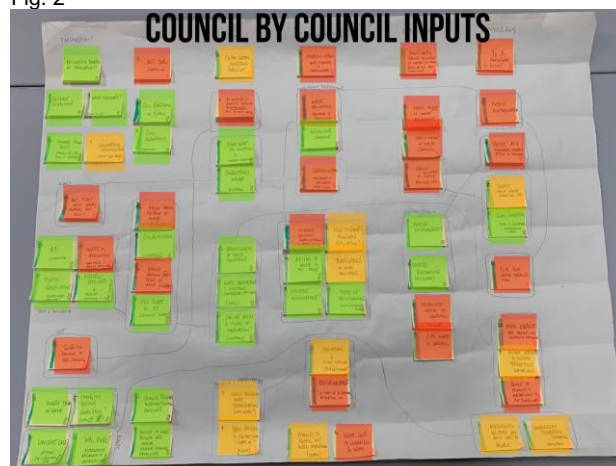


Fig. 2



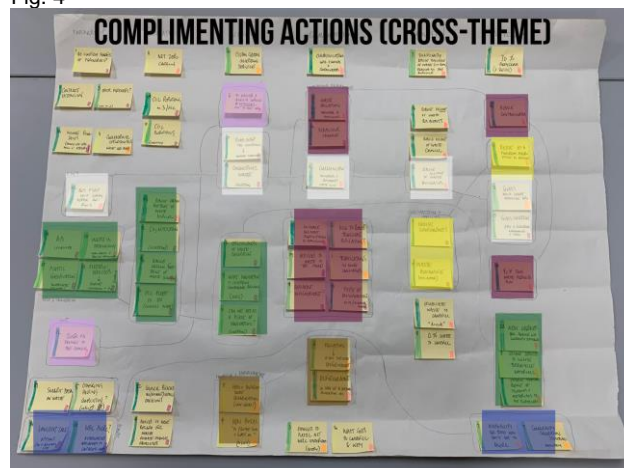
KEY: Green – Bracknell Forest
Orange – Reading
Red - Wokingham

Each council's contributions are colour-coded to show the contribution by each council (Fig.2). Some groupings, within the contributions of each council, are apparent. We can also see that each council has contributed widely across the themes and that broad consensus, on the direction of the partnership, is identifiable. The 6 themes, which emerge from the analysis of the data collected from the sessions conducted by each council on January 21st, 2021, are shown below (Fig.3). It is also possible to identify complimentary actions, across themes (Fig.4). These complimentary actions illustrate that the re3 partnership can, and should, address waste issues strategically, without undue separation (silos) between aspirations and services.

Fig. 3



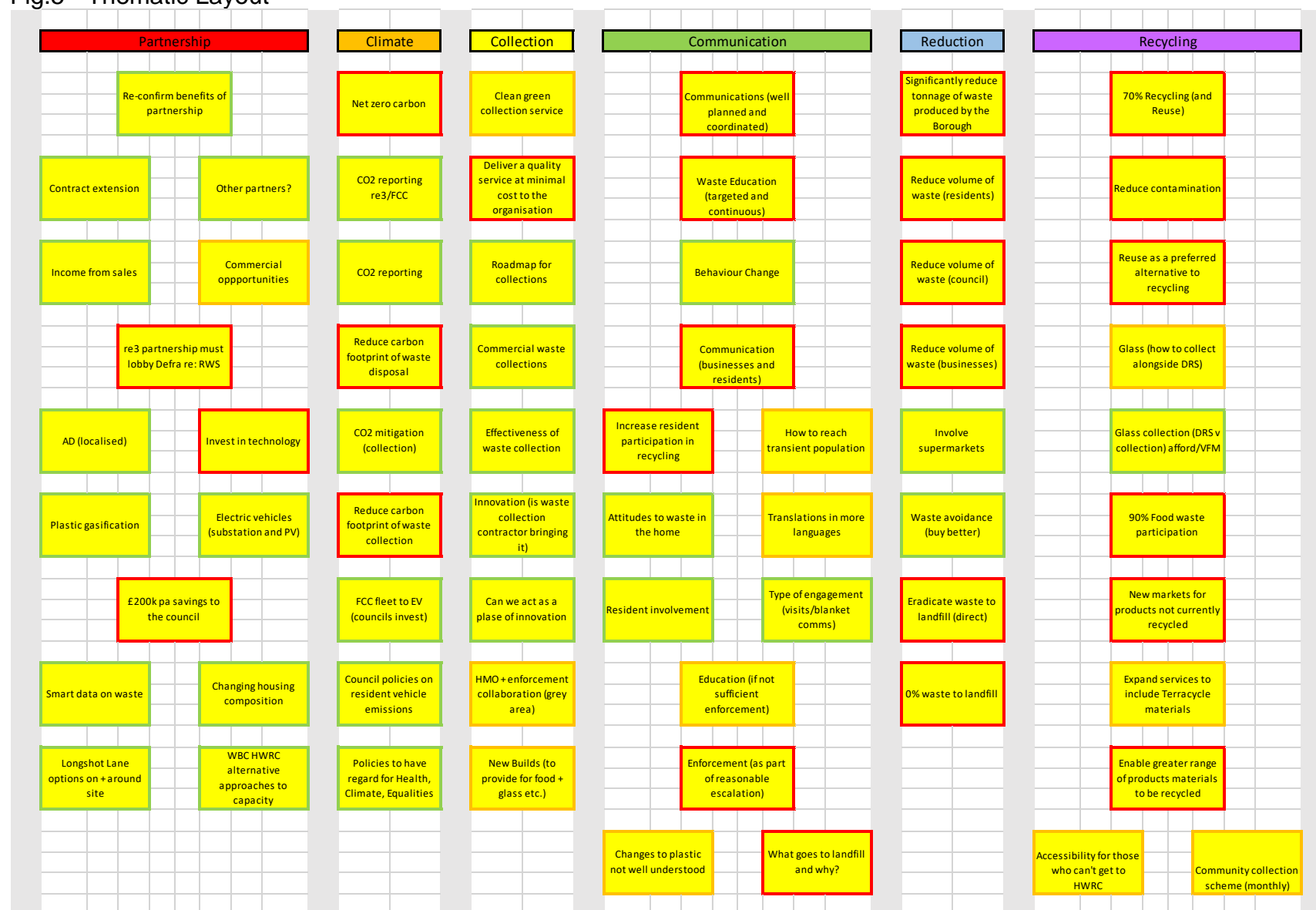
Fig. 4



KEY: White – Resources and Waste Strategy
Green – Technology and Innovation
Lilac – Costs/Savings
Blue – Household Waste Recycling Centres
Brown – Education and Enforcement
Burgundy – Behaviour Change
Yellow – Consumption and Lifecycle

A waste management partnership between Bracknell Forest, Reading and Wokingham Borough Councils.

Fig.5 - Thematic Layout



APPENDIX 2 – Legislation/Guidance

As described above, the re3 Strategy has drawn-upon the objectives of the Resources and Waste Strategy (RWS). The precise requirements of the RWS are still being drafted. In the meantime, chapter 3 of the RWS is entitled ‘Recovering Resources and Managing Waste’. It starts with the statements principal objectives listed in Fig.6, below, which represent a helpful summary for the purposes of this briefing. They read as follows (relevance to re3 partnership added in bold):

Fig 6. Government statement of Principles

Waste is a very costly misuse of our natural capital. We want to prevent waste occurring in the first place – this is a key principle of this Strategy. But, as the above makes clear, some amount of waste is inevitable. So, where it does continue to occur, we need to manage it in the most resource efficient way possible, in keeping with the waste hierarchy.

*The roles of local authorities and the waste sector are critical at this stage of the lifecycle. As Government we must set clear expectations, **giving them the confidence to invest in infrastructure to deal with waste and to promote UK-based recycling**, and this chapter aims to do just that. And we must, and will, ensure that local authorities are resourced to meet new net costs arising from the policies in this Strategy, including up front-transition costs and ongoing operational costs.*

*Our long-term ambition is to **move away from weight-based recycling targets**. Developing the metrics and indicators which will allow us to do this will take time, as is set out in Chapter 8. In the meantime, we will continue to work towards weight-based targets where it makes sense to do so.*

*Our goal is for **at least 65% of municipal waste by weight to be recycled by 2035**, with no more than 10% ending up in landfill. We also have an overarching commitment of working towards eliminating food waste to landfill by 2030, which will tackle the problem of landfill emissions head on.*

This chapter sets out how we will:

- **Improve recycling rates** by ensuring a consistent set of dry recyclable materials is collected from all households and businesses
- **Reduce greenhouse gas emissions from landfill** by ensuring that every householder and appropriate business has a weekly separate food waste collection, subject to consultation
- **Improve urban recycling rates**, working with business and local authorities
- **Improve working arrangements between, and better support performance of, local authorities**
- Drive greater efficiency of Energy from Waste (EfW) plants
- Address barriers to the use of recycled materials
- Encourage waste producers and managers to implement the waste hierarchy in respect of hazardous waste

The re3 Strategy will set out a process for, as a minimum, compliance with the still emerging specific requirements of the Resources and Waste Strategy (as it is ultimately contained within the Environment Bill.

APPENDIX 3 – Operations Inputs

Consultation with our principal Contractor, FCC, and the respective waste collection providers, will be important, in each of the five strategic categories.

[further content here following consultation]

APPENDIX 4 – Residents and Local Stakeholders

Consultation with residents and local stakeholders will be important and represents an opportunity for the re3 partners to seek views and consent.

[further content here following consultation]

TO: JOINT WASTE DISPOSAL BOARD
17th June 2021

Environment Bill - Resources and Waste Strategy Report of the re3 Project Director

1 INTRODUCTION

- 1.1 The purpose of this report is to provide a briefing for the Joint Waste Disposal Board (JWDB) on two consultations, under the Resources and Waste Strategy sections of the forthcoming Environment Bill.
- 1.2 It was not possible to report to the JWDB prior to the submission of the two consultation responses, though some separate Member briefings were arranged.
- 1.3 This report provides an opportunity to record the response made by the re3 partnership and explore the opportunities for the councils to prepare for future compliance.

2 RECOMMENDATION

- 2.1 **That Members note the contents of this report and acknowledge the responses made on behalf of the re3 partnership of councils.**
- 2.2 **That Members note the three key areas of the partnership responses, reviewed specifically in this report from paragraph 5.36.**

3 ALTERNATIVE OPTIONS CONSIDERED

- 3.1 The content of the recommended responses is drafted following consideration of a range of sources. These include: national associations, trade bodies, Defra, consultation with neighbouring councils, our principal contractor, FCC, and not least an understanding of arrangements at the three councils.

4 REASONS FOR RECOMMENDATION

- 4.1 The Environment Bill is a significant piece of legislation, part of which is devoted to waste management. The re3 councils are partners who have recently made significant steps towards early compliance with the measures required in the Environment Bill.
- 4.3 The content of the responses has been drafted in consideration of the perspectives of other local authorities (individually, or as associations) but also from consultations with private sector stakeholders. Throughout the proposed answers, the over-riding principle has been to assess and reflect what is best for the re3 councils and their residents.

5 BACKGROUND INFORMATION

- 5.1 This Government's stated rationale for the package of legislative changes, incorporated in the Environment Bill is described, in a quote from the Resources

and Waste Strategy (2018) as follows:

The Government's ambitious new Resources and Waste Strategy seeks to redress the balance in favour of the natural world. Our goal is to move to a more circular economy which keeps resources in use for longer – for that to happen, we must all reduce, reuse and recycle more than we do now.

- 5.2 The elements that relate to waste are separated into four discreet but inter-related elements. They are:
1. Extended Producer Responsibility
 2. Deposit Return Scheme
 3. Consistency in Waste Collection
 4. Plastic Tax
- 5.3 This note deals with the first two elements, whose second consultations close on June 4th. Consultation on the third element is now belatedly open, though for a shorter period, and closes on July 4th. The fourth element, a plastic tax directed principally at producers and importers of packaging, is discussed herein but is not a matter upon which the re3 councils need to respond.
- 5.4 Together, the four elements will prompt a revolution in the way that waste is managed in the UK (specifically England, Wales and NI). The nature and funding of waste management will be fundamentally changed. Waste collection is likely to be largely prescribed initially through legislation and statutory guidance and, in future, by a new organisation which collects and distributes funding from global producers and packaging companies. The universality of scope and comprehensive public utility, of council waste collections, will be reduced by the introduction of a Deposit Return Scheme. New performance targets will be set – relating to municipal waste rather than household waste.
- 5.5 The New Burdens doctrine will be applied to net costs, but more clarity is needed over the likely method of calculation. In none of the 3 elements which relate to local authorities are any 'consequential costs' recognised by Defra, such as where the new legislation may cause councils to breach contractual undertakings.
- 5.6 Alongside considerable uncertainty, there is also potential opportunity for the re3 councils. Through developments in our partnership, the councils are already compliant with many aspects of the changes. The co-collection of household and business waste, as municipal waste, may present opportunities for councils and local businesses. Finally, collaboration, through partnerships such as re3, is going to be more important as time goes on, meaning that Bracknell Forest, Reading and Wokingham Borough Councils have some potential time advantages over other councils.

Extended Producer Responsibility (EPR)

- 5.7 This element of the legislation is aimed at reforming existing systems for recording and incentivising the recycling of packaging, in the UK. It aims to do that by ensuring that producers pay the full costs of dealing with the waste they produce. Hitherto local government has funded the collection and reprocessing of household waste.

- 5.8 The consultation proposes that the fees producers will pay, to cover the disposal costs of their packaging, should be varied to reflect criteria such as recyclability. For example, producers who use unrecyclable packaging (such as polystyrene or black plastic), will be required to pay higher fees thereby incentivising them to use recyclable packaging and introduce clear and consistent labelling for recyclability.
- 5.9 Government estimates that costs will be in the region of £2.7bn in the first full year of implementation.
- 5.10 The consultation proposes minimum recycling targets for the six packaging materials. These equate to an overall recycling rate for Extended Producer Responsibility packaging of 73% by 2030
- 5.11 Government intends to procure a Scheme Administrator who will receive payments from Producers and distribute payments to local authorities, based on factors such as the quantity and quality of packaging waste collected and recycled. Procurement will commence in late 2021, with the successful Scheme Administrator appointed in early 2023.
- 5.12 As part of full net cost payments, producers of commonly littered packaging, such as fast food packaging and single use cups, will also be made responsible for the costs of its management. This will place a strong incentive on those producers to seek to prevent littering, and where this is not possible, ensure it is effectively managed through litter bins and street cleansing.
- 5.13 Subject to parliamentary approval of the Environment Bill, Government proposes that the first phase of Extended Producer Responsibility to be established in 2023, enabling initial payments for household packaging waste to local authorities from October 2023.

Deposit Return Scheme (DRS) for the UK

- 5.14 DRS will encourage the removal of some higher value recyclable materials from council collections and residents/consumers will be required to take them to a separate place, for recycling, incentivised by the opportunity to retrieve a deposit they have previously paid at the point of sale.
- 5.15 To make the scheme work, Producers of consumable products will be required to place a redeemable deposit on certain in-scope packaging (branded products in containers) that they place for sale.
- 5.16 Retailers who sell in-scope packaging will be obligated to accept all deposit return scheme containers returned to their store and ensure the deposit price is added to the purchase price of an in-scope product at the point of purchase.
- 5.17 A Deposit Management Organisation (DMO) will administer the entire scheme, including paying Retailers the amount needed to directly refund consumers when they return packaging to a DRS, reverse vending terminal or manual return points. The DMO will also own packaging material collected through a DRS.
- 5.18 Government proposes that the scheme captures PET plastic bottles, glass

bottles, and steel and aluminium cans.

- 5.19 HDPE bottles (e.g. milk and cleaning products), beverage cartons and pouches and sachets will not be in-scope.
- 5.20 Government favours an 'all-in scheme' which would include all drinks containers up to 3L in size. The alternative DRS option, an 'on-the-go' scheme for products often consumed outside or whilst travelling, and drinks containers under 750ml in size and excluding those containers sold in multipacks, is not favoured by Government.
- 5.21 Government has assumed a deposit level of 20p on each item (even individual items in multi-packs), though the DMO will have scope to change the deposit in order to manage scheme effectiveness. Returns will likely be via reverse vending machine or manual return points, but the regulations will apparently be broad in nature, to ensure alternative methods of return are not ruled out if the Deposit Management Organisation wish to explore these.
- 5.22 The DRS is expected to achieve a minimum 85% collection rate for the containers in scope and is scheduled to commence in 2024.
- 5.23 The DMO will make payments to local authorities for any packaging which is not processed through the DRS.
- 5.24 Defra has not included, in its impact assessments, the cost to local authorities for consequential costs arising from the removal of valuable materials from current council services, where many waste management contracts include revenue sharing and/or minimum tonnage or composition guarantees. In such cases, councils may be powerless to comply with their existing commitments and would likely be due to compensate their contractors. At present no recognition of that issue is present in Defra impact assessments or plans for New Burdens funding.
- 5.25 To assess these consequential costs, a formal notice was issued to the Contractor, for modelling to be undertaken. Based on historical data for the 2020/21 year, the cost to the re3 partnership for one year was assessed conservatively as being £676k (at a 90% DRS capture scenario).

Consistency in Waste Collection (for information only, councils to submit separate responses)

- 5.26 This consultation was initially delayed by Government and has a shorter consultation period, with a response deadline of 4th July 2021. A brief description of its main characteristics is included below, to help in the process of briefing ahead of a response to this consultation.
- 5.27 The Waste Collection Consistency sections of the Environment Bill will require all local authorities to arrange for the collection of:
- glass bottles and jars
 - metal – will include foil and aerosols
 - plastic – will ultimately include plastic film and cartons
 - paper and card – likely requirement to collect separately for quality
 - food – must be collected weekly

- garden waste – will likely be a free service to residents
- 5.28 Alongside prescribing what materials must be collected by local authorities, the legislation will also prescribe how it is collected. Three service archetypes have been developed. While there are some conditions around the end of existing contractual arrangements, the archetypes will be an expectation on councils and relative adherence is likely to impact on funding. The archetypes are:
- Multi-stream collections – effectively separate collection of, or receptacle for, each material type.
 - Two-stream dry recycling collections – e.g. one bin for paper and card, another bin for plastic and metal and/or glass. Separate collections for food and garden waste.
 - Comingled collections – e.g. mixed paper and card, plastic and metal. Likely separate collections of glass, food and garden waste.
- 5.29 In the previous (2019) consultation, there was high support from the public for a free, minimum collection service for householders producing garden waste. If implemented, this would be a limited free collection service, with local authorities retaining the provision to charge where the service exceeds a fortnightly collection or is in a receptacle over 240 litres in volume. If the service is totally free, it would remove over £3m in service subscriptions from the three councils – revenue which currently supports the provision of services. The consultation seeks views on whether a ‘reasonable’ charge could be retained, research having identified such a level to be in the range £18-£30 per annum (compared with a UK average of £43pa).
- 5.30 the Environment Bill will also require all businesses and non-domestic premises to arrange for the collection of glass, metal, plastic, paper and card and food waste for recycling or composting. This collection of what is termed ‘non-household municipal’ waste will broaden the performance regime for recycling. How this wider classification of waste will be measured, and to whom targets will be applied, is yet to be clarified.

Plastic Tax (consultation response unnecessary by councils)

- 5.31 Government wishes to stimulate circularity in UK supply chains – meaning that resources are not used and then disposed of, but instead used and then reprocessed for further use.
- 5.32 Accordingly, Government has proposed, and will introduce, a tax on plastic packaging produced in, or imported into, the UK.
- 5.33 The tax will be levied at a rate of £200 per tonne for any plastic packaging which does not include at least a 30% recycled content.

Key Issues from the draft re3 Consultation Responses

- 5.34 There is a large amount of detail contained within the respective consultation documents and the draft Environment Bill.
- 5.35 To assist with understanding the main factors relating to EPR and DRS, which

need to be widely understood, three key issues are described below. They are:

1. There is considerable duplication between the measures on Waste Collection Consistency, which, for example, require councils to collect glass from all households (amongst other materials) and an 'all-in' DRS which, Government predicts, will capture 85% of available glass packaging.

A statutory requirement upon councils, and their contractors, to invest in obvious duplication, increases the risk of inefficient purchasing and legacy/asset-redundancy issues.

Along with the Local Authority Recycling Advisory Committee (LARAC) and the Environmental Services Association (ESA), re3 is advocating: (i) a delay in the introduction of DRS and, (ii) a review of its scope ahead of any future planning for its introduction. Our reasoning is summarised as follows:

- We do not believe that DRS should be introduced at the same time as the other measures, for reasons of scale, avoidance of duplicated costs and national infrastructure preparedness.
 - We consider that the extended producer responsibility (EPR) and Consistency measures should make considerable improvements in recycling on their own and, crucially, give effect to the genuine producer responsibility principles that Government wishes to introduce.
 - We believe that a review of DRS following the successful implementation of EPR and Consistency will allow a much less disruptive form of DRS to be introduced, if it is needed at all.
 - Finally, we highlight the absence of any consideration of consequential costs, caused where DRS removes value and/or tonnage from existing contracts, forcing councils to breach composition and/or revenue sharing conditions. These have been assessed as costing at least c£676k per annum (based on 2020/21). These costs must be addressed by Government.
2. Assuming DRS is introduced at some point, we have indicated strong support for the use of technology in potentially enabling redemption of DRS deposits by residents at home, and via their existing council collections. Officers have spoken with the providers of our successful re3cyclopedia App, which may have some potential for further development, in this area. Such arrangements could preserve the current service utility offered by council collections and thus also the integrity of council collections.
 3. We have concerns that the proposals overlook access and storage issues. These are:
 - There is no recognition how frail, elderly and/or those residents with disabilities will practically comply with regular requirements to take items back to a reverse vending machine. Equalities issues are not reflected in the consultation documents or impact assessment. For any residents who have concerns about, or

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difficulties with, access, the practical requirements on residents, of these proposals, may prove to be disenfranchising. Such residents *will* face a financial burden, as the deposit on 'in-scope' items will be unavoidable at the point of purchase but, because of factors relating to their age or disability (which are protected characteristics under the Equalities Act) they may not be able to regularly redeem the deposits they've made.

- No clear consideration has been given to how residents who live in multi-occupancy dwellings, or flats, will store items of packaging before they can return them and redeem the deposit. Items of packaging with an unredeemed value (the deposit) may not be able to be stored securely outside the home. Accordingly, residents with space constraints, as above, may find it is more difficult to make DRS work for them, than it is for householders.

5.36 Elsewhere in the draft responses to these consultations, the re3 partnership is advocating payments being linked to efficient and effective collections systems, which is effectively no different than the current market conditions. We have also indicated support for payments relating to 'in-scope' items which are collected by local authorities as litter.

5.37 We are disagreeing that payments to local authorities should be net of an average price per tonne for materials collected, and that material values should be retained by local authorities.

5.38 We are also advocating that local authorities must be represented on the board of the Scheme Administrator for EPR. This is important as, without meaningful representation, the interests of packaging producers (which will already be highly influential) may over-rule our continuing interests.

6 ADVICE RECEIVED FROM STATUTORY AND OTHER OFFICERS

Borough Solicitor

6.1 Not applicable

Borough Treasurer

6.2 not applicable

Equalities Impact Assessment

6.3 Not applicable

Strategic Risk Management Issues

6.4 There are noted risks (as identified in the report) for local authorities. Service Officers have been briefed and consulted. Risks will be reviewed upon confirmation of the final legislative package, with between 2 and 5 years for specific elements to be delivered at that point.

7 CONSULTATION

Principal Groups Consulted

7.1 Not applicable

Method of Consultation

7.2 Not applicable

Representations Received

7.3 Not applicable

Background Papers

Not applicable

Contacts for further information

re3 Project Team

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Consultation on Introducing a Deposit Return Scheme in England, Wales and Northern Ireland

No.	Question	Proposed Response
	What is your name?	Oliver Burt
	What is your email address?	oliver.burt@reading.gov.uk
	Which best describes you? Please provide the name of the organisation/business you represent and an approximate size/number of staff (where applicable).	Local Government
	If you are responding on behalf of an organisation, what is its name?	re3 (re3 is a partnership of three Unitary Authorities in Berkshire, Bracknell Forest, Reading and Wokingham Borough Councils)
	Would you like your response to be confidential?	No
6	Given the context of the Covid-19 pandemic we are currently experiencing, do you support or oppose our proposals to implement a deposit return scheme for drinks containers in 2024?	<p>Oppose</p> <p>(The current Covid-19 pandemic has accelerated many changes and identified imperatives that might otherwise have been overlooked. Residents certainly appreciate and are likely to favour convenience over complexity. Residents are also more receptive to issues relating to the environment and particularly so in relation to waste.</p> <p>The suite of changes introduced by the Environment Bill is too complex to be introduced at the same time as other measures (EPR and Consistency), Equalities issues are insufficiently considered (neither in terms of access nor performance impacts) and consequential costs to local authorities have not adequately been taken into account and reflected in relevant impact assessments.</p> <p>In relation to environmental (climate change) concerns, the impact of a DRS appears to be over-stated as it compares its own impact solely to the disposal of waste via landfill. For the re3 partnership, landfill</p>

		<p>usage is at c12%, so is not the appropriate comparator.</p> <p>A DRS directly duplicates requirements upon Local Authorities (LAs) that are included within the provisions on Consistency in Waste Collection (Consistency). Consistency should be fully introduced alongside the Extended Producer Responsibility (EPR) provisions and their impact assessed before the scope and scale of a potential DRS is then reviewed. DRS should only be introduced to the level required to supplement EPR and Consistency. Otherwise foreseeably supplemental/additional costs are built-in to the wider Environment Bill provisions on waste. LAs will be required to make costly amendments to collection and handling/sorting arrangements, to satisfy Consistency, but DRS will (if it operates to the 85% effectiveness expected))</p>
7	Do you believe the introduction of a deposit return scheme will have an impact on your everyday life?	<p>Yes, a detrimental impact</p> <p>Large impact but still manageable</p> <p>(From the perspective of consumers/residents, yes, a DRS will have an impact on everyday life. It will: (i) increase costs to consumers for products they buy regularly, (ii) impact on the utility of their existing waste and recycling collections, making them personally responsible for the separate storage, handling and 'haulage' of waste items, (iii) it will likely increase the numbers of journeys made, which will have additional (financial and climate change costs). This is because, while many people will take items when they are going shopping, our experience, from operating Recycling Centres, shows that many people also like to deal with their waste when it is convenient to them. Finally, the proposals seemingly fail to take appropriate, and advance, account of the impacts on the frail, elderly and/or those with disabilities. The imposition of a deposit on 'in-scope' items of packaging, may represent a form of unavoidable taxation to individuals who may find access to reverse vending machines difficult or impossible).</p>
8	Have your views towards implementation of a deposit return scheme been affected following the economic and social impacts of the Covid-19 pandemic?	<p>Yes because of economic and social impacts.</p> <p>(We consider that DRS during the time of a pandemic would be problematic. We may never have similarly disruptive lockdowns again but during 2020, the existing waste</p>

		collection and recycling services (certainly those within the re3 area) were robust and reliable in a way that was genuinely helpful to residents. They allowed residents to manage their waste and recycle from the comfort and safety of home. It was greatly appreciated by residents. A DRS will inevitably undermine the existing waste collection system and offers nothing like the convenience and safety of existing systems)
	Chapter 1: Scope of the deposit return scheme	
9	Do you agree that the cap should be included as part of the deposit item in a deposit return scheme for:	a) Plastic bottle caps on plastic bottles – yes b) Aluminium bottle caps on glass bottles – yes c) Corks in glass bottles – no d) Foil on the top of a can / bottle or used to preserve some drinks – yes
	<i>Note: For questions 10, 12, 13, 14, 15 respondents should note that these questions are only applicable to the outstanding decision on the final scope of a deposit return scheme to be made in England and Northern Ireland, since the Welsh Government have already presented a preference for an all-in deposit return scheme.</i>	
10	Do you believe we have identified the correct pros and cons for the all-in and on-the-go schemes described above?	<p>No.</p> <p>Alongside the other elements of the Environment Bill, as they relate to waste management, DRS is too disruptive to be introduced in one go.</p> <p>Consequential costs are absent from the accompanying impact assessments. As one example, many waste management contracts have revenue sharing provisions in them. LAs will likely be unable to avoid breaching such conditions because of the removal of tonnage and/or value from their contracts by DRS. These significant and foreseeable consequences have inexplicably been ignored in planning a DRS, thus far. Over-simplistic analyses, based only on litter, collection and sorting costs are insufficient and overlook contractual costs.</p> <p>Costs to the re3 partnership arising as a direct result of the introduction of an 'all-in DRS' have been assessed by the partnership's waste contractor in a range from £440,000 per annum to £670,000 per annum (each representing a single year, based on actual waste flows in, respectively 2019/20 and 2020/21). The above figures are conservative estimates and take no account of, negative impacts on remaining council collection services (where no direct financial incentive exists), other costs which</p>

		<p>may be unavoidable as a result of EPR or Consistency.</p> <p>Moreover, a DRS directly duplicates waste collection expectations on Local Authorities (LAs), that are included within the provisions on Consistency in Waste Collection (Consistency). Foreseeably supplemental/additional collection costs will be borne by LAs. This duplication of costs is unnecessary in the first place but will inevitably lead to legacy issues, as the Deposit Management Organisation (DRS) and Scheme Administrator (EPR) seek to reduce costs for producers. We would foresee further councils funding cuts being inevitable, and losses of value on investments that were originally forced upon them by the requirement to adhere to both EPR and DRS. Consistency should be fully introduced alongside the Extended Producer Responsibility (EPR) provisions and their impact assessed before the scope and scale of a potential DRS is then reviewed. DRS should only be introduced to the level required to supplement EPR and Consistency.</p>
11	Do you foresee any issues if the final scope of a deposit return scheme in England and Northern Ireland does not match the all-in decision taken in Wales? E.g. an on-the-go scheme in England and an all-in scheme in Wales.	<p>No.</p> <p>An 'on-the-go' scheme in England and NI would not impact on the choice for Wales to adopt an 'all-in' scheme, or vice versa. There would only be materially significant issues if one administration or the other rejected DRS completely – in which case there may be some issues of compliance. However, where the difference between administrations is one of scale, there should be no fears for compliance, nor operational issues either.</p>
12	Having read the rationale for either an all-in or on-the-go scheme, which do you consider to be the best option for our deposit return scheme?	<p>'on-the-go'</p> <p>An 'on-the-go' scheme would significantly moderate the avoidable duplication of costs and conditions (between DRS and Consistency), it would help to preserve the utility of existing council recycling collections for the public, it would moderate the additional expenditure on the part of consumers and the additional effort to subsequently redeem their deposits, it would moderate any Equalities issues for the frail, elderly or disabled, it would better recognise the objective of addressing litter)</p>
13	Given the impact Covid-19 has had on the economy, on businesses and consumers, and on everyday life, do you	Yes

	believe an on-the-go scheme would be less disruptive to consumers?	
14	Do you agree with our proposed definition of an on-the-go scheme (restricting the drinks containers in-scope to less than 750ml in size and excluding multipack containers)? b) If no, how would you change the definition of an on-the-go scheme?	Yes
15	Do you agree that the size of containers suggested to be included under an on-the-go scheme are more commonly consumed out of the home than in it?	Yes
16	Please provide any information on the capability of reverse vending machines to compact glass?	We cannot comment with authority on the ability of reverse vending machines to crush glass but, from the operation of a MRF, which occasionally and inadvertently processes glass (as a contaminant), and the collection of bottle bank glass, we can comment on the messy and abrasive properties of crushed glass.
17	Do you agree that the scope of a deposit return scheme should be based on container material rather than product?	Yes
18	Do you agree with the proposed list of materials to be included in scope?	Yes
19	Do you consider there will be any material switching as a result of the proposed scope? Please provide evidence to support your response.	Material switching may occur as a result of the proposed scope. That may occur in the event of unintended or unforeseen consequences – perhaps linked to the recyclability requirements of the EPR measures.
	Chapter 2: Targets	
20	Which of the following approaches do you consider should be taken to phase in a 90% collection target over 3 years? a) 70% in year 1, 80% in year 2, 90% in year 3 and thereafter b) 75% in year 1, 80% in year 2, 90% in year 3 and thereafter c) 75% in year 1, 85% in year 2, 90% in year 3 and thereafter d) 80% in year 1, 85% in year 2, 90% in year 3 and thereafter	(a) (this offers steady progression towards the objective and would allow much needed time for infrastructure and UK markets to develop)
21	What collection rate do you consider should be achieved as a minimum for all materials after 3 years? a) 80% b) 85% c) 90% collection rate should be achieved for all materials	(a)
22	Is it reasonable to assume that the same collection targets could be met with an on-the-go scheme as those proposed for an all-in scheme for in-scope materials?	Yes The proportionate capture of 'in-scope' material could be the same whether for 'all-in' or 'on-the-go'.
23	Who should report on the volumes of deposit return scheme material placed on the market in each part of the United Kingdom (England, Wales and Northern Ireland) for the proposed deposit return scheme, and what would be the implications of these obligations? a) The producer/importer b) The retailer c) Both the producer/importer and retailer	(c) The Producer/Importer and retailer (It must be both categories. The retailer must report because it is at the point of purchase, when the deposit is paid, that the DRS system becomes 'live' for an individual item of packaging. The Producer/Importer must report volumes so that the DMO can track produced/imported but unsold or out of sell-by date products (packaging), for which no deposit has been paid but for

		which a recycling and circularity burden remains)
24	What evidence will be required to ensure that all material collected is passed to a reprocessor for the purpose of calculating the rate of recycling of deposit return scheme material?	Passing to a reprocessor (which may not be a direct transaction) does not constitute recycling. Evidence that material has been passed, potentially through several stages of transit, to appropriate and trusted reproducers will be needed. However, conditions on the stakeholders under EPR (S12 - Compliance and Enforcement) could (or will) apply in this case. They could be used to provide the necessary assurance over the flow of materials through a DRS to appropriate/trusted reproducers.
	Chapter 3: Scheme governance	
25	What length of contract do you think would be most appropriate for the successful bidder to operate as the Deposit Management Organisation? a) 3-5 years b) 5 – 7 years c) 7 – 10 years d) 10 years +	(c) 7-10 years
26	Do you agree that the above issues should be covered by the tender process? Please list any further issues you believe should be covered as part of the tender process.	Yes (The only other issue we would identify is the involvement of stakeholder representatives in the process of drafting and finalising any procurement documents, and throughout the procurement process (attending appropriate meetings, sight of appropriate correspondence with bidders, scoring bids etc.)
27	Do you agree that the above issues should be monitored as Key Performance Indicators? Please list any further issues you believe should be covered by Key Performance Indicators .	Yes (Other indicators could be: <ul style="list-style-type: none"> • Assessing overall scheme efficiency (relative to the ultimate 90% target) • Assessing reverse vending utilisation (in terms of % availability) • Composition of returned items, by material and geography • Quality of returned items (there is an assumption this will be high) so that it can be compared against the measurements taken via Waste Collection Consistency.)
28	Do you agree that Government should design, develop and own the digital infrastructure required to register, and receive evidence on containers placed on the market on behalf of the Deposit Management Organisation and regulators?	Yes It is important that Government is seen to be involved and in ownership of this massive change for residents/consumers, particularly at the outset where most change/disruption

		will be experienced. Consumers should be clear that this is a Government initiative.
29	Government will need to understand the needs of users to build digital services for deposit return scheme. Would you like your contact details to be added to a user panel for deposit return scheme so that we can invite you to participate in user research (e.g. surveys, workshops interviews) or to test digital services as they are designed and built?	Yes
	Chapter 4: Financial flow	
30	What is an appropriate measure of small producers for the purposes of determining the payment of registration fees?	Taxable Turnover This is a better measure of the company's overall capacity to pay a registration fee.
31	Is a high level of unredeemed deposits funding the scheme problematic?	Yes. This initiative has been described as part of producer responsibility obligations, alongside the specific EPR arrangements. But a DRS for the UK is actually a 'consumer obligations' initiative. Consumers will entirely fund this, and while Government stresses that it is a consumer choice to either redeem or not redeem, there will be no choice over the initial deposit. Furthermore, consumers will forego the current ease and utility of their council recycling collections. They will make (to some extent) additional trips to return items of packaging and provide interim additional storage for DRS items. Covering scheme costs via unredeemed deposits is a poor idea from both the perspective of how it looks to consumers and in terms of overall fairness. Finally, it may be that frail, elderly and/or disabled consumers are amongst principal contributors to the unredeemed deposits – as it is those members of society that may find it hardest to return items and redeem deposits. This outcome, if it comes to pass, will be most unjust and also massively detrimental to the scheme. Age and Disability are protected characteristics under the Equalities Act and yet they only feature within the consultation as a KPI that 'could' be part of the contract management regime applied to the DMO. As protected characteristics, Government should have given appropriate, and advance, consideration to accessibility impacts. It must not seek to pass-on that duty to an organisation which has not been created yet and whose accountability is as yet undetermined.
32	Which option to treatment of unredeemed deposits do you support?	Option 2

		<p>However, again this has considerable scope to be poorly received by consumers. This scheme represents a form of taxation that which consumers will find it very hard, if not impossible, to avoid. A significant proportion (e.g. at least half) of any unredeemed deposits must be allocated to improvements which assist consumers – either directly through the development of technology which allows residents to scan and redeem at home (which could keep scheme costs low and reduce fees to Producers), or towards local environmental causes and/or climate change community adaptations.</p>
33	With option 2, do you foresee any unintended consequences of setting a minimum percentage of the net costs of the deposit return scheme that must be met through the producer fee?	<p>No</p> <p>We would expect Producers, who are (as a collective) powerful advocates for DRS, to fully support the effective operation of any UK DRS, regardless of a minimum level of fees. They must be seen to be investing in the entire system, rather than being perceived as (or actually) having run-up a debt which they pass to consumers in its entirety.</p>
34	<p>If a floor is set do you consider that this should be set at:</p> <p>a) 25% of net costs b) 33% of net costs c) 50% of net costs d) Other</p>	(c) 50% of net costs
35	Do you agree that any excess funds should be reinvested in the scheme or spent on other environmental causes?	<p>Environmental Causes</p> <p>(as described at Q32)</p>
36	<p>What should be the minimum deposit level set in legislation?</p> <p>a.) 10p b.) 15p c.) 20p d.) Other</p>	<p>C) 20p</p> <p>(cited research shows that, to work, the deposit needs to be significant. If it is too low, it may just constitute an unavoidable cost whose incentive is too low to prompt the behaviour it is designed to promote)</p>
37	<p>Do you agree that there should be a maximum deposit level set in legislation?</p> <p>Yes / no</p> <p>If yes, what should be the maximum deposit level set in legislation?</p> <p>a.) 30p b.) 40p c.) 50p d.) Other</p>	<p>(d) Other</p> <p>(The maximum should be set to rise based-upon inflation. However, it should be limited to rounded-up units of 5p and only increased when it can be increased in units of 10p. For example, only when inflation on the initial deposit of 20p reaches 26p would the actual deposit paid by consumers be increased to 30p. This would balance the relative depreciation of the deposit over time with the pre-loading of the deposit, in the interests of consumers).</p>
38	Recognising the potentially significant deposit costs consumers could pay on a multipack purchase, how best can we minimise the impact of the scheme on consumers buying multipacks?	<p>This may not be possible. The problem is that individual items in a multipack may be redeemed separately and at different times. It would be simplest to simply allocate the</p>

		deposit to each item but to consider multi-packs in setting the deposit.
39	Do you agree with our approach to letting the Deposit Management Organisation decide on whether to adopt a fixed or variable deposit level, particularly with regards to multipacks?	This may not be possible. The problem is that individual items in a multipack may be redeemed separately and at different times. It would be simplest to simply allocate the deposit to each item but to consider multi-packs in setting the deposit.
	Chapter 5: Return points	
40	Do you agree that all retailers selling in-scope drinks containers should be obligated to host a return point, whether it is an all-in or on-the-go deposit return scheme?	Unsure (Smaller retailers should be given consideration because it may not be possible for them to maintain manual return points)
41	Given the proposed extensive distribution and availability of return points for consumers to return bottles to, do you think customers would be likely to experience delays / inconveniences in returning drinks containers? If so, how long or how frequently would such delays be likely to arise for?	It is very difficult to know how long delays will last – experience would suggest that times of week and busier times of year (e.g. Easter and Christmas) would be liable to be more problematic. However, it is likely to be generally more inconvenient to residents to need to attend and/or queue for a DRS reverse vending machine. This will inevitably place an additional burden on residents and may undermine scheme efficiency.
42	Do you have a preference, based on the 3 options described above, on what the schemes approach to online takeback obligations should be? We welcome views from stakeholders on who this obligation should apply to, including if there should be an exception for smaller retailers or low volume sales. Please explain your answer.	Option 3 The process of redemption (of deposits) seems to be a potentially complicated additional burden on what has become an efficient transaction (the delivery of groceries). It could be messy and difficult to keep returned in-scope items separate from other grocery deliveries etc.
43	Do you agree with the proposed criteria for the calculation of the handling fee? Yes / No Would you propose any additional criteria are included for the calculation of the handling fee?	Yes (none)
44	Please tick which exemptions you agree should be included under the scheme: - Close proximity - Breach of safety	Close Proximity <input checked="" type="checkbox"/> Breach of Safety <input checked="" type="checkbox"/>
45	Please can you provide any evidence on how many small and micro sized retail businesses we might likely expect to apply for an exemption to hosting a return point, on the grounds of either close proximity to another return point or on the compromise of safety considerations?	Unsure
46	Do you think obligations should be placed on retailers exempted from hosting a return point to display specific information informing consumers of their exemption? If yes, please tick what information retailers should be required to display: a.) Signage to demonstrate they don't host a return point; b.) Signage to signpost consumers to the nearest return point; c.) Anything else?	(b)

47	<p>Do you agree with our rationale for not requiring retailers exempted on the basis of a breach of safety not to be required to signpost to another retailer?</p> <p>Yes / No</p> <p>Please explain your answer</p>	<p>No</p> <p>Signposting is a minimum form of assistance to consumers. The wording can make it clear that there are good reasons for no return point but information should be provided which supports consumers to comply with the scheme (and get their money back).</p>
48	<p>How long do you think exemptions should be granted for until a review date is required to ensure the exemption is still required?</p> <p>a.) 1 year b.) 3 years c.) 5 years or longer</p>	<p>(b) 3 years</p>
49	<p>Do you think the scheme could benefit from technological solutions being incorporated as a method of return, alongside reverse vending machines and manual return points? Yes / No</p>	<p>Yes</p>
50	<p>How could a digital deposit return scheme solution be integrated into existing waste collection infrastructure? Please explain your answer.</p>	<p>A digital deposit return scheme (DDRS) certainly should be part of the existing waste collection infrastructure. It will future-proof DRS as it could integrate (within the overarching objectives of Government to increase recycling etc.) technological advances, which are available or emerging at the moment. Unlike reverse vending based DRS, it will put a recycling convenience at the heart of the system. We believe that there is evidence that a large majority of residents would prefer to carry on benefiting from their existing, well-established kerbside collection and they should not be adversely burdened and asked to manually return items to redeem their deposits. This may be particularly impractical for elderly residents.</p> <p>To make DDRS happen – each householder should receive a unique card and/or a sticker with an assigned QR code that can be attached to the recycling bin or box. When the residents wants to return an in-scope item, it will use a smartphone device or designated reader (similar to use in the banking system for non-smartphone users) to scan/input the QR code to login to their account and then scan/input a code of the item (visible on the prescribed packaging label and as discussed elsewhere in this consultation) that holds a deposit. All deposited items can be mixed with other items and the recycling bin/box is then collected as usual.</p> <p>Any existing recycling app – for example one used by our re3 partnership – re3cyclopedia could be easily integrated with the national DDRS via an API.</p>

51	What are the potential fraud control measures a digital deposit return scheme could bring? Please explain your answer.	<p>We are aware that much thought is being given to this issue and while we do not have a technological answer to offer, we believe that the search for such is worthwhile.</p> <p>All efforts should be put into seeking to forestall the massive expense (ultimately for consumers and the public sector) which will be imposed by an 'all-in' DRS.</p>
52	<p>Do you think a digital deposit return scheme could ensure the same level of material quality in the returns compared to a tradition[al] return to retail model, given containers may not be returned via a reverse vending machine or manual return point where there is likely to be a greater scrutiny on quality of the container before being accepted?</p> <p>Yes / No Please explain your answer.</p>	<p>Yes</p> <p>We do not believe that there will be complete 'scrutiny' of use of reverse vending machines. Other items will likely be placed in them.</p> <p>It remains an assumption that the quality of materials deposited via a UK reverse vending DRS may be greater. However, it may all depend on the quality of the MRF sort. Based on our own data – our MRF achieves 99% purity of aluminium + 96% of PET + 96% HDPE +90% of mixed plastic. Accordingly, our view is that the quality of recyclate may reach a very similar level but will involve massive disruption to residents/consumers and vast amounts of additional cost. Retrospective improvements to existing MRFs is possible and we are undertaken this now.</p>
53	If the digital deposit return scheme system can be integrated into the existing waste collection infrastructure would its implementation and running costs be lower? Please provide evidence to support your answer.	<p>Yes</p> <p>Most certainly running costs would be lower. If each container at home could serve as an individual reverse vending machine, this will greatly reduce the overall number of required DRS points. This means less frequent emptying required and lower maintenance cost or transport costs. Individual costs would be much lower as well, as residents won't need to make an additional trip to the points to deposit their items. If there is no need for additional container delivered to residents but only a sticker/card and a widely available App – the cost of implementation would be off-set by lower number of public vending machines. Majority of bin vehicles have in built weigh in system – so any cost should be associated mainly with developing a suitable software that is required anyway.</p>
54	Do you support the proposal to introduce a new permitted development right for reverse vending machines, to support the ease of implementation for the scheme? 71	Unsure

	<p>Yes / No</p> <p>Do you have any amendments or additional parameters you would propose are reflected in the permitted development right?</p>	<p>How would 'appropriate locations' be assessed at a national level? Could scale be limited in some way? Neighbours of potential reverse vending machine sites should be able to rely-upon some protection from the implications of a new waste reception site being established.</p>
	Chapter 6: Labelling	
55	<p>Do you agree that the following should be part of a mandatory label for deposit return scheme products?</p> <p>(a) Identification marker that can be read by reverse vending machines and manual handling scanners</p> <p>(b) A mark to identify the product as part of a deposit return scheme</p> <p>(c) The deposit price</p>	Agree all.
56	<p>Are you aware of further measures that can be taken to reduce the incidence and likelihood of fraud in the system?</p>	<p>A unique marker, on every product, would be one way. However, it is doubtful whether such a system, capable of generating billions of unique symbols, exists.</p> <p>Markers could in theory be reused once the product had been returned and recycled.</p>
57	<p>Do you agree with our proposals to introduce mandatory labelling, considering the above risk with regards to containers placed on the market in Scotland?</p>	Yes
58	<p>Do you consider the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland to be a significant risk? Please provide any evidence to support your answer.</p>	<p>The likelihood of items from Scotland entering the markets of England, Wales or Northern Ireland (and vice versa) is undoubtedly present. However, it must be possible to identify a solution (sharing of appropriate bar codes, ID etc.). Failure to support collaborative systems across the UK would, to an extent which cannot easily be quantified, promote further distance and dislocation within the UK administrations and communities.</p>
59	<p>Do you consider leaving any labelling requirements to industry to be a better option than legislating for mandatory labelling requirements? Please explain your answer.</p>	<p>No</p> <p>Government is the body introducing DRS and it must remain the ultimate responsibility of Government. Plus, a centrally mandated approach to labelling will help to avoid the pitfalls and duplication of potentially multiple labelling styles. We have seen, in the case of dietary advice on products, that multiple and voluntary approaches do not improve customer knowledge. The theme of consistency is being applied to local authorities and is warranted in this aspect of the legislative package too.</p>
60	<p>Are you aware of any other solutions for smaller producers who may not currently label their products? Please explain your answer.</p>	<p>No</p> <p>However, this is why a single, national/Government approach is needed. It will be important for the minimum info requirements to be placed on all 'in-scope' packaging.</p>

61	We believe 18 months is a sufficient period of time for necessary labelling changes to be made. Do you agree?	Yes.
62	Will your processes change as a result of mandatory labelling? Yes/ No/ Don't know. Please explain your answer	No
63	Do you agree that our proposed approach to labelling will be able to accommodate any future changes and innovation? Yes / No / Don't know Are you aware of any upcoming technology in the field of labelling?	Yes
Chapter 7: Local authorities and local councils		
64	Do you agree that local authorities will be able to separate deposit return scheme containers either themselves or via agreements with material recovery facilities to regain the deposit value?	Yes Please Note: It should be possible for local authority MRF operators to provide sufficiently accurate weight data, from which estimates of unit numbers can be made. These should be used as a measure of deposit values. The potential for manual deposit of large numbers of 'in-scope' items would probably not be efficient.
65	Do you agree that local authorities will be able to negotiate agreements with material recovery facilities to ensure gate fees reflect the increased deposit values i[f] waste streams or a profit sharing agreement on returned deposit return scheme containers was put in place? - Yes - No Please explain your answer.	Yes Please note: Such agreements already exist for many MRF-related contracts. However, the proposals described here do not sufficiently replace the lost revenue and consequential contract costs that would be caused by an 'all-in' DRS.
66	In order to minimise the risk of double payments from the Deposit Management Organisation to local authorities, where should data be collected regarding the compositional analysis to prevent the containers then being allowed to be redeemed via return points?	Local authorities will not be seeking double payment. The only rational place that the data can be collected is at the MRF. An analysis of MRF output composition is already required in the Material Recovery Facilities (MRF) Regulations 2014. Redepmtion should be possible via weight assessment (as per answer to 64).
67	How difficult do you think this option would be to administer, given the need to have robust compositional analysis in place? Please explain your answer	As above, analysis of MRF output composition is already required in the Material Recovery Facilities (MRF) Regulations 2014.
68	What option do you think best deals with the issue of deposit return scheme containers that continue to end up in local authority waste streams? a. Option 1 b. Option 2 c. Option 3 Please briefly state the reasons for your response. Where available, please share evidence to support your view.	<u>If it were accompanied by an 'on the go' DRS scheme</u> , Option 1 would be the preferable option. However, the two must go together because of the failure of these proposals to recognise existing agreements between local authorities and MRF operators. If Government introduces an 'all-in' DRS then Option 2 would be preferable. As previously highlighted, MRF output sampling is already a requirement.

		Costs to the re3 partnership arising as a direct result of the introduction of an 'all-in DRS' have been assessed by the partnership's waste contractor in a range from £440,000 per annum to £670,000 per annum (each representing a single year, based on actual waste flows in, respectively 2019/20 and 2020/21). The above figures are conservative estimates and take no account of, negative impacts on remaining council collection services (where no direct financial incentive exists), other costs which may be unavoidable as a result of EPR or Consistency.
	Chapter 8: Compliance monitoring and enforcement	
69	Are there any other producer obligations you believe the Environmental Regulators should be responsible for monitoring and enforcing	No The list of obligations appears to adequately cover need.
70	Are local authorities (through the role Trading Standards and the Primary Authority Scheme) best placed to enforce certain retailer obligations? Yes /No Please give any alternative suggestions. To what extent will local authorities be able to add monitoring and enforcement work for the deposit return scheme to existing duties they carry out with retailers?	Yes Consultation with colleagues from Trading Standards (TS) revealed that something similar exists in relation to battery recycling, in supermarkets. The extent to which TS can devote additional time to a new enforcement obligation will be different across the country and will obviously relate to overall local authority funding. Payment for this role, through scheme costs, would be advised.
71	In addition to those in the table, are there any other types of breaches not on this list that you think should be? If so, what are they? These may include offences for participants not listed e.g. reprocessors or exporters.	Likely types of non-compliance (or failure to actively support compliance) by reprocessors and exporters should feature in the list
72	Are there any vulnerable points in the system? Please explain your answer?	It is hard to identify any obvious points of vulnerability. Complete compliance would be an incredibly high bar and an unlikely outcome and enforcement will need to evolve to maintain standards. We would, therefore, support a review of compliance being programmed on a suitable timetable (e.g. every two years). Following the review, amendments and measures could be introduced.
73	Do you see a role for the Deposit Management Organisation to seek compliance before escalating to the Regulator?	Yes
74	Do you agree with the position set out regarding enforcement response options? If not, please expand your answer	Yes
	Chapter 9: Implementation Timeline	
75	Do you have any comments on the delivery timeline for the deposit return scheme?	The timetable appears to be overly ambitious.

	Please pose any views on implementation steps missing from the above?	We believe that DRS should be postponed until EPR and Consistency have been successfully established. At that point, the case for DRS should be reviewed in light of any benefits or detriments it would add to the (then established) other measures. There are considerable risks from introducing an 'all-in' DRS at the same time as EPR and Consistency. Those have been reflected herein, and include, not least, the costs that have not been reflected in calculations associated with DRS e.g. relief payable to contractors for breach of value/composition agreements in waste management contracts.
76	How long does the Deposit Management Organisation need from appointment to the scheme going live, taking into account the time required to set up the necessary infrastructure? Please provide evidence to support your answer. a.) 12 months b.) 14 months c.) 18 months d.) Any other (please specify)	c) 18 months We believe that any extra time that can be provided, will be useful.
77	Depending on the final decision taken on the scope of the scheme in England and Northern Ireland – all-in or on-the-go – what, if any, impact does this have on the proposed implementation period?	An 'all-in' DRS would be disruptive and should, therefore, be accompanied by as much time as possible, and certainly 18 months as a minimum implementation period. An 'on-the-go' DRS would be far less disruptive and it may be possible to deliver such a scheme within 18 months.

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Consultation on Extended Producer Responsibility for Packaging

No.	Question	Proposed Response
	What is your name?	Oliver Burt
	What is your email address?	Oliver.burt@reading.gov.uk
	Which best describes you? Please provide the name of the organisation/business you represent and an approximate size/number of staff (where applicable).	Local Government (re3 is a partnership of three Unitary Authorities in Berkshire, Bracknell Forest, Reading and Wokingham Borough Councils)
	Would you like your response to be confidential?	No
	Government will need to understand the needs of users to build digital services for Extended Producer Responsibility. Would you like your contact details to be added to a user panel for Extended Producer Responsibility so that we can invite you to participate in user research (e.g. surveys, workshops, interviews) or to test digital services as they are designed and built?	Yes
	<u>4. What we want to achieve: packaging waste recycling targets</u>	
6	Do you agree or disagree with the proposed framework for setting packaging targets? a. Agree b. Disagree c. Neither agree nor disagree If you disagree, please provide the reason for your response.	Agree
7	Do you agree or disagree that the business packaging waste recycling targets set for 2022 should be rolled over to the calendar year 2023? a. Agree b. Disagree c. Neither agree nor disagree If you disagree, please provide the reason for your response.	Agree
8	Do you agree or disagree that the recycling target to be met by 2030 for aluminium could be higher than the rate in Table 3? a. Agree b. Disagree c. Neither agree nor disagree If you disagree, please provide the reason for your response.	Neither agree nor disagree (We do not support the immediate introduction of the DRS elements of the wider legislative package and therefore wish to make no logically contradictory submissions in relation to targets)

9	<p>Do you agree or disagree with the proposed minimum target to be met by 2030 for glass set out in table 3?</p> <p>a. Agree b. Disagree c. Neither agree nor disagree</p> <p>If you disagree, please provide the reason for your response.</p>	<p>Neither agree nor disagree</p> <p>(We do not support the immediate introduction of the DRS elements of the wider legislative package and therefore wish to make no logically contradictory submissions in relation to targets)</p>
10	<p>What should the glass re-melt target for 2030 for non-bottle packaging be set at?</p>	<p>We do not feel qualified to comment on the precise target. It should take into account factors such as the structural integrity of packaging, product safety and the availability of secondary cullet. However, if levels above the current 2021/22 target of 72% are practically possible, a higher target should be set.</p>
11	<p>Do you agree or disagree with the proposed minimum target to be met by 2030 for plastic set out in table 3?</p> <p>a. Agree b. Disagree c. Neither agree nor disagree</p> <p>If you disagree, please provide the reason for your response.</p>	<p>Neither agree nor disagree</p> <p>(We do not support the immediate introduction of the DRS elements of the wider legislative package and therefore wish to make no logically contradictory submissions in relation to targets)</p>
12	<p>Do you think a higher recycling target should be set for wood in 2030 than the minimum rate shown in Table 3?</p> <p>a. Yes b. No c. Unsure</p> <p>Please provide the reason for your response.</p>	<p>Unsure.</p> <p>We do not feel qualified to comment on the precise target. High/er levels of wood recycling are potentially possible dependent on the approach taken by the EA to reviews into wood recycling and the separation of different types of wood.</p>
13	<p>Q13. If higher recycling targets are to be set for 2030, should a sub-target be set that encourages long term end markets for recycled wood?</p> <p>a. Yes b. No c. Unsure</p> <p>Please provide the reason for your response.</p>	<p>Yes.</p>
14	<p>Do you agree or disagree with the proposed minimum target to be met by 2030 for steel set out in table 3?</p> <p>a. Agree b. Disagree c. Neither agree nor disagree</p> <p>If you disagree, please provide the reason for your response.</p>	<p>Neither agree nor disagree</p> <p>(We do not support the immediate introduction of the DRS elements of the wider legislative package and therefore wish to make no logically contradictory submissions in relation to targets)</p>
15	<p>Do you agree or disagree with the proposed minimum target to be met by 2030 for paper/card set out in table 3?</p> <p>a. Agree b. Disagree c. Neither agree nor disagree</p>	<p>Agree</p>

	If you disagree, please provide the reason for your response.	
16	Do you agree or disagree with the proposal to set recycling targets for fibre-based composites?	Agree
17	Do you agree or disagree that there may be a need for closed loop recycling targets for plastics, in addition to the plastics packaging tax? a. Agree b. Disagree c. Neither agree nor disagree Please provide the reason for your response.	Agree (The case for closed-loop targets can and should be established now. The level of targets could, as discussed, be reviewed in consideration of the impact of EPR.)
18	Please indicate other packaging material that may benefit from closed loop targets	Metal and/or glass packaging
	<u>5. Producer obligations for full net cost payments and reporting</u>	
19	Do you agree or disagree that Brand Owners are best placed to respond effectively and quickly to incentives that are provided through the scheme? a. Agree b. Disagree c. Neither agree nor disagree	Agree
20	Are there any situations where the proposed approach to imports would result in packaging being imported into the UK which does not pick up an obligation (except if the importer or first-owner is below the de-minimis, or if the packaging is subsequently exported)?	No view
21	Of Options 2 and 3, which do you think would be most effective at both capturing more packaging in the system and ensuring the smallest businesses are protected from excessive burden?	Option 3 (This is Government's preference and is designed to reduce burdensome admin for smaller producers)
22	If either Option 2 or 3 is implemented, do you consider there to be a strong case to also reduce the de-minimis threshold as set out in Option 1?	Unsure
23	Do you think that Online Marketplaces should be obligated for unfilled packaging in addition to filled packaging?	No (We consider there to be a risk of double counting from online market places)
24	Do you foresee any issues with Online Marketplaces not being obligated for packaging sold through their platforms by UK-based businesses?	No
25	This proposal will require Online Marketplaces to assess what packaging data they can collate and then, where there are gaps to work together to create a methodology for how they will fill those gaps. Do you think there are any barriers to Online Marketplaces developing a methodology in time for the start of the 2022 reporting year (January 2022)?	Yes (Timelines are already very challenging and could only realistically be met with greater resource being devoted.)
26	Is there any packaging that would not be reported by the obligation as proposed below (except for packaging that is manufactured and sold by businesses who sit below the de-minimis)?	Unsure
27	Do you agree or disagree that the Allocation Method should be removed?	Agree

		(Actual obligation not allocated obligation is appropriate)
	<u>Producer obligations: disposable cups takeback</u>	
28	Do you agree or disagree that a mandatory, producer-led takeback obligation should be placed on sellers of filled disposable paper cups?	Agree
29	Do you agree or disagree with the proposed phased approach to introducing any takeback obligation, with larger businesses/sellers of filled disposable paper cups obligated by the end of 2023, and the obligation extended to all sellers of filled disposable paper cups by the end of 2025?	Agree
	7. Modulated Fees & Labelling	
30	Do you think that the proposed strategic frameworks will result in a fair and effective system to modulate producer fees being established?	Yes
31	Do you agree or disagree that the Scheme Administrator should decide what measures should be taken to adjust fees if a producer has been unable to self-assess, or provides inaccurate information? This is in addition to any enforcement action that might be undertaken by the regulators.	Disagree (It should be clear at the outset, that a higher fee (sufficient to discourage failures in self-assessment) will be levied in applicable cases)
32	Do you agree or disagree with our preferred approach (Option 1) to implementing mandatory labelling?	Disagree Ease of compliance by consumers should be fundamental to the package of measures. That should be Government's principal aim, even if this is at the risk of losing some ease for producers.
33	Do you agree or disagree with the proposal that all producers could be required to use the same 'do not recycle' label?	Agree
34	Do you think that the timescales proposed provide sufficient time to implement the new labelling requirements?	Yes (However we should recognise that as new labelling is phased-in, consumers will begin to expect that the information on the label is correct and that the recyclability of packaging will be matched by services)
35	Do you agree or disagree that the labelling requirement should be placed on businesses who sell unfilled packaging directly to small businesses?	Agree
36	Do you think it would be useful to have enhancements on labels, such as including 'in the UK' and making them digitally enabled?	Yes. Purposeful information and functionality should be encouraged.
37	Do you agree or disagree that local authorities across the UK who do not currently collect plastic films in their collection services should adopt the collection of this material no later than the end of financial year 2026/27?	Disagree (1) The collection of waste is not a problem and could

		<p>be arranged, with relative ease by the 2026/27. However, there is little value in collecting material which (as currently) would be considered a contaminant by reprocessors.</p> <p>(2) There are likely contractual issues for some LAs around the processing of material for which no sustainable markets currently exist. These must not be left for councils to resolve alone, given the imposition of new operating conditions and the likely reductions in funding that will ensue from this package of legislation.</p> <p>If the secure capacity for recycling film is established by 2026/27 and the contractual issues were satisfactorily resolved, then the answer to this question would be 'Agree'.</p>
38	Do you agree or disagree that collections of plastic films and flexibles from business premises across the UK could be achieved by end of financial year 2024/5?	<p>Neither Agree nor Disagree</p> <p>(Co-collection with household waste would seem sensible and also still need to ensure that reprocessing capacity exists)</p>
39	Do you think there should be an exemption from the 'do not recycle' label for biodegradable/compostable packaging that is filled and consumed (and collected and taken to composting/anaerobic digestion facilities that accept it), in closed situations where reuse or recycling options are unavailable?	<p>Disagree</p> <p>(This material does not currently seem compatible with closed-loop and circular economy principles)</p>
40	Do you consider that any unintended consequences may arise as a result of the proposed approach to modulated fees for compostable and biodegradable plastic packaging?	Unsure
	8. Payments for managing packaging waste	
41	Do you agree or disagree with the proposed definition and scope of necessary costs?	Agree
42	Do you agree or disagree that payments should be based on good practice, efficient and effective system costs and relevant peer benchmarks?	<p>Agree</p> <p>(Though we do not agree that the Scheme Administrator should be able to change how payments are calculated without reasonable and meaningful checks and balances (evidence and a genuinely</p>

		balanced, representative and consultative approach).
43	Do you agree or disagree that the per tonne payment to local authorities for packaging materials collected and sorted for recycling should be net of an average price per tonne for each material collected?	<p>Disagree.</p> <p>At present many LAs are adequately funded to collect waste and are also able to keep (at least a share of) the revenue from material sales. The proposed system effectively discounts the sales of material from the cost of collection. It is a clear reduction in funding compared with current conditions. Furthermore, long-term (WDA) contracts often have revenue-sharing commitments in them which may put the LA at risk of contract breach if material values are removed in this way.</p> <p>Material values should be retained in full by the LA, at least until a fair transition and any contractual issues are resolved fairly for LAs.</p>
44	Do you agree or disagree that the Scheme Administrator should have the ability to apply incentive adjustments to local authority payments to drive performance and quality in the system?	<p>Disagree</p> <p>It remains possible that the Scheme Administrator will simply be an extension of the producers, who are incentivised to reduce costs to them at every opportunity. As above (Q42), more assurance needs to be given over the equitability of the Scheme Administrator and a voice for LAs within it.</p>
45	Do you agree or disagree that local authorities should be given reasonable time and support to move to efficient and effective systems and improve their performance before incentive adjustments to payments are applied?	Agree
46	Should individual local authorities be guaranteed a minimum proportion of their waste management cost regardless of performance?	Agree
47	Do you agree or disagree that there should be incentive adjustments or rewards to encourage local authorities to exceed their modelled recycling benchmarks?	<p>Neither Agree nor Disagree</p> <p>(There's a danger that the Scheme Administrator, at the instruction of producers, will not itself be incentivised to equitably reward over-performance)</p>
48	Do you agree or disagree that unallocated payments should be used to help local authorities meet their recycling performance benchmarks, and contribute to Extended Producer Responsibility outcomes through wider investment and innovation, where it provides value for money?	<p>Agree</p> <p>(How does Defra think there will be unallocated payments... unless comments at Q44 are founded and the Scheme Administrator will be</p>

		expected to bear-down on any and all payments to LAs by Producers)
49	Do you agree or disagree that residual payments should be calculated using modelled costs of efficient and effective systems based on the average composition of packaging waste within the residual stream?	Disagree (The scheme should not use the average composition across the waste stream, that is too blunt an instrument. Analyses of composition must be done far more widely and used for accurate modelling of costs per area)
50	Do you agree or disagree that a disposal authority within a two-tier authority area (England only) should receive the disposal element of the residual waste payment directly?	Agree (For each higher-tier/UA)
51	Do you agree or disagree that there remains a strong rationale for making producers responsible for the costs of managing packaging waste produced by businesses?	Agree
52	Do you agree or disagree that all commercial and industrial packaging should be in scope of the producer payment requirements except where a producer has the necessary evidence that they have paid for its management directly?	Agree
53	Which approach do you believe is most suited to deliver the outcomes being sought in paragraph 8.84?	Option 1 (The per tonne approach is most closely aligned to the producer pays principle and, likely actual costs)
54	Do you disagree strongly with any of the approaches above?	Yes (Option 3 is concerning from the perspective of likely actual practice. Contamination of the free bin is likely)
55	Do you think there will be any issues with not having either Packaging Recovery Notes/Packaging Export Recovery Notes or the business payment mechanism (and as a result recycling targets) in place for a short period of time?	Unsure
56	Do you agree or disagree with the proposal to introduce a sampling regime for packaging waste as an amendment to the MF Regulations in England, Wales and Scotland and incorporation into new or existing regulations in Northern Ireland?	Agree (This requirement exists already, building on that seems sound)
57	Do you agree or disagree with the proposal to require all First Points of Consolidation to be responsible for sampling and reporting in accordance with a new packaging waste sampling and reporting regime?	Agree (Contamination can most accurately be tracked at the 'First Point')
58	Do you agree or disagree that the existing MF Regulations' de-minimis threshold of facilities that receive 1000 tonnes or more per annum of mixed waste material would need to be removed or changed to capture all First Points of Consolidation?	Agree
59	Do you think the above list of materials and packaging formats should form the basis for a manual sampling protocol?	Unsure
60	Do you think it is feasible to implement more rigorous sampling arrangements, as suggested above, within 6-12 months of the regulations being in place?	Unsure

61	Do you think visual detection technology should be introduced from 2025 to further enhance the sampling regime?	Agree (This is already being used in some MRFs and could supplement manual sampling. Care needs to be taken that it does not wholly replace manual sampling until it can do as good a job.)
62	Do you think existing packaging proportion protocols used by reprocessors would provide a robust and proportionate system to estimate the packaging content of source segregated materials?	Unsure
63	Do you agree or disagree that minimum output material quality standards should be set for sorted packaging materials at a material facility?	Disagree (The Market already applies this via prices/acceptance. The supply chain does not need another layer of administration added to MRF operators or LAs who fund them)
64	Do you agree or disagree that material facilities that undertake sorting prior to sending the material to a reprocessor or exporter should have to meet those minimum standards in addition to just assessing and reporting against them?	Disagree (What would be the point? The market either accepts the material or doesn't – which is already the case)
65	Do you think any existing industry grades and standards could be used as minimum output material quality standards?	Unsure (Again, what would this add to the system which is purposeful and worth measuring?)
66	Do you agree or disagree that local authority payments should be made quarterly, on a financial year basis?	Agree
67	Do you agree or disagree that household and business packaging waste management payments should be based on previous year's data?	Disagree (The gap is too long and would make actual performance harder to align with service activity)
9. Litter payments		
68	Do you agree or disagree that the costs of litter management should be borne by the producers of commonly littered items based on their prevalence in the litter waste stream as determined by a composition analysis which is described in option 2?	Agree
69	In addition to local authorities, which of the following duty bodies do you agree should also receive full net cost payments for managing littered packaging? Selecting multiple options is allowed.	<input type="checkbox"/> Other duty bodies <input checked="" type="checkbox"/> Litter authorities <input checked="" type="checkbox"/> Statutory undertakers <input type="checkbox"/> None of the above <input checked="" type="checkbox"/> Any other(s) - please specify* *Volunteer Sector, and any other organisations that incur costs from litter.
70	Do you agree or disagree that producers should contribute to the costs of litter prevention and management activities on other land?	Agree

71	Do you agree or disagree that local authority litter payments should be linked to improved data reporting?	Agree (This should be factored-in to the EPR payment received for litter)
72	Do you agree or disagree that payments should be linked to standards of local cleanliness over time?	Disagree (Litter and Cleanliness is a local issue, part of the relationship between the council and local residents (and what they respectively consider to be appropriate))
10. Scheme Administration and Governance		
73	Do you agree or disagree that the functions relating to the management of producer obligations in respect of household packaging waste and litter including the distribution of payments to local authorities are managed by a single organisation?	Agree (The independence of the Scheme Administrator must be paramount and Government must retain a key role. LAs must have a meaningful and proportionate role in any governance, reflecting not just its role in the supply chain but also the views of residents (as opposed to just 'consumers'). The above LA role must be given effect before any procurement commences so an LA voice is present from commencement in 2021 and must remain throughout.
74	Overall which governance and administrative option do you prefer?	Option 1 (Compliance Schemes have been shown to increase costs (e.g. WEEE) and don't obviously offer any benefit in this case)
75	How do you think in-year cost uncertainty to producers could be managed?	<input checked="" type="checkbox"/> A reserve fund <input type="checkbox"/> In-year adjustment to fees <input type="checkbox"/> Giving individual producers flexibility to choose between options 1) and 2) <input type="checkbox"/> No preference <input type="checkbox"/> Need more information to decide (Whilst supportive of this idea, we note that potential fluctuations in payments to LAs are not considered with anything like as much concern. This is important because LAs provide a suite of important local services the budget/s for which which, under the terms described herein, may

		be impacted by the Producers applying pressure to the Scheme Administrator and any subsequent change in calculation methodology)
76	Under Option 1, does the proposed initial contract period of 8-10 years (2023 to 2030/32) provide the necessary certainty for the Scheme Administrator to adopt a strategic approach to the management and delivery of its functions and make the investments necessary to deliver targets and outcomes?	Yes.
77	Under Option 2, does the proposed initial contract period of 8-10 years (2023 to 2030/32) provide the necessary certainty for the Scheme Administrator to adopt a strategic approach to the management and delivery of its functions and make the investments necessary to deliver targets and outcomes?	Yes.
78	Do you agree or disagree with the timeline proposed for the appointment of the Scheme Administrator?	Neither Agree nor Disagree (The timeline for the appointment of a Scheme Administrator is an ambitious one)
79	If the Scheme Administrator is appointed in January 2023 as proposed, would it have sufficient time to mobilise in order to make payments to local authorities from October 2023?	Unsure
80	Do you agree or disagree with the approval criteria proposed for compliance schemes?	Agree
81	Should Government consider introducing a Compliance Scheme Code of Practice and/or a 'fit and proper person' test?	<input type="checkbox"/> A Compliance Scheme Code of Practice <input type="checkbox"/> A 'fit and proper person' test for operators of compliance schemes <input checked="" type="checkbox"/> Both <input type="checkbox"/> Neither <input type="checkbox"/> Unsure
82	Do you agree or disagree with the proposed reporting requirements for Option 1?	Agree
83	Do you agree or disagree with the proposed reporting requirements for Option 2?	Agree
	11. Reprocessors and Exporters	
84	Do you agree or disagree with the proposal that all reprocessors and exporters handling packaging waste will be required to register with a regulator?	Agree
85	Do you agree or disagree that all reprocessors and exporters should report on quality and quantity, of packaging waste received?	Agree
86	What challenges would there be in reporting on the quality of packaging waste received at the point of reprocessing and/or export?	Reprocessors already sample input quality and, within the UK, this could likely be built-upon to the standard required. For exports, that would be more difficult as the reprocessors would not be required to comply with UK law. Here again though, it might be worth considering whether

		additional requirements are needed, above those already existing in the market.
87	Do you think contractual arrangements between reprocessors and material facilities or with waste collectors and carriers are a suitable means for facilitating the apportionment and flow of recycling data back through the system to support Extended Producer Responsibility payment mechanisms, incentives and targets?	Yes
88	Do you agree or disagree that exporters should be required to provide evidence that exported waste has been received and processed by an overseas reprocessor?	Agree (Exporters/Brokers must play the definitive (and often a greater) role in ensuring assurance of end destinations. This is something that can only really be achieved by the UK Government and this legislative package is a great opportunity)
89	Do you agree or disagree that only packaging waste that has achieved end of waste status should be able to be exported and count towards the achievement of recycling targets?	Agree (Example: If PET bottles are cleaned and flaked and the flakes are exported that could satisfy the conditions here... though 'end of waste' might still need to be redefined in order to achieve that, as the 'product' could still be assessed as being waste)
90	Do you agree or disagree that there should be a mandatory requirement for exporters to submit fully completed Annex VII forms, contracts and other audit documentation as part of the supporting information when reporting on the export of packaging waste?	Agree
91	Do you agree or disagree that regulators seek to undertake additional inspections of receiving sites, via 3rd party operators?	Agree (Reprocessors will need to comply with all auditors, 3rd party or otherwise. We have considerable experience of this and it is sometimes quite hard to get reprocessors to support visits and/or provide meaningful information on process outcomes)
	12. Compliance and enforcement	
92	Do you agree or disagree with the proposed approach to regulating the packaging Extended Producer Responsibility system?	Agree
93	Do you have further suggestions on what environmental regulators should include in their monitoring and inspection plans that they do not at present?	No further suggestions
94	In principle, what are your views if the regulator fees and charges were used for enforcement?	Agreement
95	Would you prefer to see an instant monetary penalty for a non-compliance, or another sanction as listed in 12.26, such as prosecution?	Agree (With prosecution reserved for serious and/or repeated non-compliance)

	13. Digital Design (no questions)	
	14. Implementation timeline	
96	Do you agree or disagree with the activities that the Scheme Administrator would need to undertake in order to make initial payments to local authorities in 2023 (as described above under Phase 1)?	Neither Agree nor Disagree (we cannot say whether other
97	Do you think a phased approach to the implementation of packaging Extended Producer Responsibility, starting in 2023 is feasible and practical?	Yes (The schedule is incredibly tight. While we recognise there is urgency in drafting, consulting and finalising these plans, the Environment Bill could help the delivery phase by building-in some further time. The reprocessors, facilities and markets, that do not currently exist to the required scale and scope, would all benefit)
98	Do you prefer a phased approach to implementing Extended Producer Responsibility starting in 2023 with partial recovery of the costs of managing packaging waste from households or later implementation, which could enable full cost recovery for household packaging waste from the start?	<input checked="" type="checkbox"/> Phased approach starting in 2023 <input type="checkbox"/> Later implementation <input type="checkbox"/> Unsure
99	Of the options presented for reporting of packaging data for 2022 which do you prefer?	Option 2 (Would give a better view over packaging as a whole)
100	Are there other data required to be reported by producers in order for the Scheme Administrator to determine the costs to be paid by them in 2023?	Unsure
	Annexes	
101	Which of the definitions listed above most accurately defines reusable packaging and could be applied to possible future reuse/refill targets or obligations in regulations.	<input type="checkbox"/> Definition in The Packaging (Essential Requirements) 2015 <input type="checkbox"/> Definition in The Packaging and Packaging Waste Directive (PPWD) <input type="checkbox"/> Definition adopted by The UK Plastic Pact/The Ellen MacArthur Foundation <input checked="" type="checkbox"/> None of the above
102	Do you have any views on the above listed approaches, or any alternative approaches, for setting reuse and refill targets and obligations?	These targets should align with the Waste Prevention Plan currently out for consultation.
103	Do you agree or disagree that the Scheme Administrator should proactively fund the development and commercialisation of reuse systems?	Agree
104	Do you agree or disagree that the Scheme Administrator should look to use modulated fees to incentivise the adoption of reuse and refill packaging systems?	Agree

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