

Joint Waste Disposal Board

Notice of Meeting

Thursday, 15 June 2023 (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 15 June 2023 at 9.30 am** in the Council Chamber, Civic Offices, Bridge Street, Reading, RG1 2LU. An agenda for the meeting is set out overleaf.

Oliver Burt
Project Director

Members of the Joint Waste Disposal Board

Councillor Helen Purnell, Bracknell Forest Council
Councillor Mary Temperton, Bracknell Forest Council
Councillor Karen Rowland, Reading Borough Council
Councillor Liz Terry, Reading Borough Council
Councillor Sarah Kerr, Wokingham Borough Council
Councillor Ian Shenton, 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 15 June 2023 (9.30 am)
Council Chamber, Civic Offices, Bridge Street, Reading, RG1 2LU.

Agenda

Page No

1. **Apologies for Absence**
2. **Election of Chair**
To elect a Chair for the meeting.
3. **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.
4. **Minutes of the Meeting of the Joint Waste Disposal Board** 5 - 12
To approve as a correct record the minutes of the Joint Waste Disposal Board held on 2 March 2023
5. **Urgent Items of Business**
To notify the Board of any items authorised by the Chairman on the grounds of urgency.
6. **Progress Report** 13 - 24
To brief the re3 Joint Waste Disposal Board on progress in the delivery of the re3 Joint Waste PFI Contract.
7. **Communications Report** 25 - 36
To brief the re3 Joint Waste Disposal Board on the Partnership's communications activities, since the last meeting.
8. **Trial Collection of Flexible Plastic Packaging** 37 - 46
To brief the re3 Joint Waste Disposal Board on an opportunity to collect flexible plastic packaging from the kerbside, ahead of collections of this material becoming mandatory.

9. **Re3 deposit return scheme correspondence report** 47 - 56
- To provide Members of the re3 Board with a briefing on correspondence, from the re3 Board to Rebecca Pow MP, Minister for Environmental Quality and Resilience, on the subject of the planned Deposit Return Scheme (DRS)
10. **Exclusion of Public and Press**
- 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 items 11 to 14 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.
- NB: No representations have been received in response to the notice under regulation 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012*
11. **CIPFA Reviews Report** 57 - 130
- To share, with the re3 Board, the content of two reviews, undertaken for Wokingham Borough Council (WBC) by the Chartered Institute of Public Finance Accountants (CIPFA), on the arrangements of the re3 partnership and the shared waste management contract.
12. **Re3 Partnership Background and Transition Report** 131 - 140
- To provide new Members of the re3 Board with a brief background to the re3 Partnership, the re3 Board and the shared arrangements.
13. **Financial Report** 141 - 158
- To brief the re3 Joint Waste Disposal Board on the Partnership's current financial position.
14. **Date of the Next Board Meeting**
- 21 September 2023

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Classification: OFFICIAL

**JOINT WASTE DISPOSAL BOARD
2 MARCH 2023
(9.30 - 11.05 am)**

Present: Bracknell Forest Borough Council
Councillor Mrs Dorothy Hayes MBE

Reading Borough Council
Councillor Tony Page
Councillor Karen Rowland

Wokingham District Council
Councillor Clive Jones
Councillor Ian Shenton

Officers Oliver Burt, re3 Strategic Waste Manager
Jayne Rowley, re3 Principal Finance Officer
Sarah Innes, re3 Performance Officer
Monika Bulmer, re3 Communication Officer
Damian James, Bracknell Forest Council
Claire Pike, Bracknell Forest Council
Andrew Edwards, Reading Borough Council

Apologies for absence were received from:

Councillor John Harrison, Bracknell Forest Council

20. Declarations of Interest

There were no declarations of interest.

21. Minutes of the Meeting of the Joint Waste Disposal Board

The spelling of Francesca Hobson would be amended within the minutes.

RESOLVED that subject to the amendments, the minutes of the meeting of the Joint Waste Disposal Board held on the 9 January 2023, be approved as a correct record.

22. Urgent Items of Business

There were no urgent items of business.

23. Progress Report

The Board received a report briefing them on progress in the delivery of the re3 Joint Waste PFI Contract.

The report covered:

- re3 and Council Performance Statistics
- Waste Tracking
- WEEE (Waste Electrical and Electronic Equipment) Banks
- Recycling of Flexible Plastic Packaging
- Booking System Translations

- Links Between Booking Systems and Fly-tipping
- HWRC (Household Waste Recycling Centre) Reuse Options
- Review of HWRC Charges
- Actions from the HWRC User Satisfaction Survey
- Community Compost Scheme
- Agenda Setting

Sarah Innes reported the provisional recycling rates for April 2022 – January 2023 were detailed within the report alongside a comparison of the full year of 2021/22. Graphs setting out the quarterly performance had also been included which showed that the recycling rates for all three Councils were slightly below the figures for last year. A full year of data would be available at the next meeting in June, Sarah would provide a full breakdown of the data at this meeting however it was already clear that the compostable tonnage, food waste and garden waste, was already below previous year's figures. It was suggested that the cost of living could have had an impact on the amount of food waste collected as people were not wasting as much food.

Since 2004, Local Authorities had to report their waste data to Government via the Waste Data Flow System. This included the tonnages of waste collected and details of how and where each tonne is treated. Later in 2023, or in 2024, these systems were due to be replaced by a digital waste tracking service. Defra was building the system up gradually and it is understood that they would work on plans for local authority usage and provision of data in the first half of 2023. It was currently unclear what the implications of this were. Officers would seek to be part of the discussions so that the implications for data entry and monitoring could better be understood.

At the January meeting of the Joint Waste Disposal Board, Members had instructed Officers to investigate the idea of using a network of recycling banks to collect small electrical appliances. Officers had spoken to three local authorities who currently use banks to collect these items and investigated how re3 could provide a similar service. As a result, an expression of interest in relation to the Material Focus WEEE fund had been submitted, which had been successful to get to the next stage of funding. Sarah asked for feedback from Members in regard to where the banks should be situated. If the bid was approved there would be 30 banks, 10 banks per authority which would allow each Council to look at a cross section of sites borough wide.

At the January Meeting of the Joint Waste Disposal Board, Members asked Officers to investigate options for recycling flexible plastic packaging and as a result Sarah had been talking to the Flexible Plastic Fund 'FlexCollect' Project which a small number of Councils were currently trialling. The FlexCollect team were currently looking for more Councils to take part in the trial and Officers have expressed an interest on behalf of the re3 Partnership. A meeting has taken place so that the Delivery Manager for the project could visit the MRF (Material Recycling Facility) and a discussion could take place about the practicalities of sorting, storing and reprocessing the waste. These tests would be undertaken in the coming weeks and subject to the outcomes of testing in the MRF further discussions would take place with the waste collection teams to identify a potential trial location. If the trial were to proceed, then the packaging would be collected in the Councils current kerbside recycling provision.

At the January 2023 meeting, Members agreed to retain the booking system at the Recycling Centres. A variety of ways to supplement the booking system were discussed at this time such as translation. As a result, translation went live in February 2023. An example of this was provided to the board. Concerns were raised

that google translated wasn't always accurate however the benefit was that many languages could be provided, and if internal Council translation facilities had been used, then there was only a total of 6 languages that would have been provided. An FAQ had been provided on the re3 website stating that there may be some errors. Contributors would look at some of the translations of key languages within the Borough.

In 2022, DEFRA funded a project to examine whether there was a link between a national increase in fly-tipping and the use of booking systems at recycling centres, which was also something that had been discussed by re3. An external company conducted surveys and interviews with local authorities and re3 Officers contributed information about the experience of the partnership through these routes. Fly-tipping statistics were also examined in detail for six local authority areas. A report was published in January 2023 setting out the findings and conclusions from the project. The report noted that no academic literature was found which provided evidence of a link between fly-tipping and booking systems. The report would be circulated to the Board.

Following on from the presentation from the re3 Contractor and discussions at the January Board meeting about the current reuse activities undertaken at the re3 facilities and the potential for future expansion to divert items from the waste stream. Members were presented with a list of options to be explored further:

- Repair workshops
- Upcycling
- 'Libraries' (Through which a range of items could be borrowed).
- Permanent reuse shops (for instance at an offsite location)
- Online reuse shops

Currently all Councils had a repair café which was a good position to be in. Monika Bulmer was keen for there to be a repair strategy and work collaboratively and promote the repair cafés.

As a result of increased costs, Officers had reviewed the prices being charged for disposal of non-household waste at the re3 recycling centres. Current prices were designed to recover the cost of handling and disposing of nonhousehold waste and were non-profit making. A table with the proposed price increases was included within the report which included an increase of soil and rubble to £3 per 35L bag for all users. Any agreed changes to the charges would be implemented from 1 April 2023. Changes to the prices would be updated on the re3 website, site signage and the booking webform.

Toilets and sinks would fall under the charge for rubble, Officers were unsure on the collection of these and would look into these.

Councillor Jones stated that he didn't want to increase the cost of soil and rubble for residents and wished to remove it all together in time. However, there were concerns that the cost would then be picked up by others. It was suggested that a report be brought back to the Board regarding the implications of the charges and what the impact of the removal of the charges would be. It was agreed by the Board that Soil and Rubble would not increase to £3 for residents, and a report would be brought back to the board.

The statistical results of the Annual HWRC User Satisfaction Survey had been presented to the meeting of the Joint Waste Disposal Board in January 2023. Since

then, the comments had been analysed. A summary of these were included in the annex to the report. Alongside the comments a list of actions had been compiled, a number of which has already been completed or underway.

Members had previously agreed to relaunch the community compost scheme with the bags of re3Grow left over from the 2022 project in Spring 2023. It was proposed that the bags this year be allocated on a first come first basis relaunches, Officers recommend that this year the compost be allocated on a first come-first serve basis, subject to the applicants meeting the advertised criteria.

Members and Officers discussed the agenda setting requirement that had been proposed as part of the Audit completed in 2022. It was proposed that one member from each Local Authority be nominated to attend the agenda setting meeting and for this to be an online meeting. It was suggested that this be held closer to the meeting date to ensure that everything was dealt with at a meeting closer to the next board meeting.

RESOLVED that

- i. Members indicated how they would like Officers to proceed in relation to the potential introduction of banks for the collection of small electrical appliances, as described at 5.15.
- ii. Members indicated which of the reuse options, listed at 5.33, they would like Officers to explore further, with the intention of returning to a subsequent re3 Board meeting with proposals.
- iii. Members reviewed the proposed revisions to charges for non-household waste, shown at 5.37, and confirm that these should be implemented to deliver full cost recovery apart from the increase to residents for soil and rubble, where a report would be brought back to the board.
- iv. Members instructed Officers to allocate compost under the relaunched community scheme, on a first-come, first-served basis, subject to appropriate allocation between the councils and the fulfilment of the agreed criteria.
- v. Members agreed a date for a first agenda setting meeting as described at 5.50 to be set before the next meeting.

24. Communications Report

The Board received a report briefing them on the Partnership's communications activities.

The report covered:

- re3Grow Community Compost scheme
- Contamination awareness
- Vapes recycling
- Recycling Centres inclusion campaign
- Safety at HWRCs campaign
- Anti-litter campaign

Monika Bulmer, e3 Communications and Marketing Officer, detailed the re3grow community compost scheme which was directed at local organisations and

schools. The scheme would be promoted to the public via local news outlets, social media, newsletters, and directly to potential beneficiaries. The press release and social media assets were currently being prepared and would be available to use by the councils' communications officers. There had been 69 beneficiaries last year, with over 160 bags distributed.

Re3Grow compost had commenced at the end of February, which was now in its fifth year. A new poster, promoting its features had been produced and would be displayed at both sites. It was reported that bags had already been sold.

A set of infographics, presenting the current contamination level in each Councils' recycling bins had been produced. It included environmental impacts and costs, and the infographic for each council. These were included in appendix 1 of the report. Across re3, £487k could have been saved last year, if all items were sorted correctly and it was important to talk about this with residents. Officers would be receiving regular infographics.

Vape recycling had been discussed at the previous meeting and was proving to be a difficult challenge. It has been established that the majority of local vape retailers have not set up the take back schemes. Trading Standards believe this is due to lack of information in relation to their legal obligations. Suggested guidance to residents was to recycle vape pens at the Recycling Centres and not placed in rubbish bins. Monika had spoken to OPSS to seek further guidance and Trading Standards had advised it might be helpful for re3 to support retailers by contacting them and providing guidance on how to set up the take back scheme.

The online booking system webform had be enhanced by integrating translation services for over 100 languages. This new feature would aim at improving accessibility and clarity for residents whose first language is not English. The new feature would be advertised using social media advertising, aiming at multicultural audiences living locally. Further research and analysis would be done to map areas of low usage and to advertise the service in those areas. Target groups who were under consideration were residents who:

- had recently moved to the area.
- lived in rented and shared accommodation.
- had low literacy levels.
- had low technical skills.
- had a disability or impairment.
- lived in a deprived area.

re3 was taking part in the trial safety campaign launched by the FCC Environment across their four contracts. The campaign aims at reducing the number of accidents on site.

The re3 Marketing and Communications Officer presented details of an anti-litter campaign that utilised an existing national app called LitterLotto. These incentivise residents to pick up and dispose of litter correctly. The full scope of the campaign had not gained approval from all partnering councils, however re3 would support any council keen to trial the tool.

RESOLVED that Members note the contents of this report.

25. **Legislation Report**

The Board received a report briefing Members in relation to the emerging detail from the Environment Act 2021, as it related to waste management.

There had been two rounds of public consultations (2020 and 2021), in which Government sought input on how the three main limbs of the strategy (Extended Producer Responsibility (EPR), Deposit Return Scheme (DRS). The consultation documents had been released on these two areas, but the documents on Waste Collection Consistency were still awaiting release.

Extended Producer Responsibility – The Government wishes producers of packaging to pay the full net cost of collection and treatment associated with the packaging placed into circulation. This is to encourage better overall design of packaging. Under EPR, producers will pay modulated fees, set according to the assessed environmental impact and/or treatment cost of the packaging they put into circulation. Councils would be assessed according to the relative 'Efficiency' and 'Effectiveness' of their service. Councils would be placed within a performance cohort, wherein their costs and their performance will be benchmarked against a 'best in class' council. Cohorts would be drawn from councils that shared some similarities.

Individual councils deemed to be sub-optimally 'efficient' and/or 'effective' may be presented with an Improvement Notice. When an Improvement Notice is issued, it would also identify future year funding reductions.

Deposit Return Scheme (DRS) - A deposit, an additional sum on top of the normal sale price, would be added to in-scope packaging, at the point of sale. It was noted that these were drink containers, bottles and cans specifically, but not all bottles and cans! The deposit would most likely be a sum such as 20p per item which was a sum that had been widely referred-to throughout the consultations. This would apply to both single and multi-pack items.

Waste Collection Consistency – Even though the report was yet to be published, it was already known that Councils would be mandated to collect newspapers and magazines, cardboard, glass bottles, plastic bottles, plastic pots/tubs/trays and steel and aluminium cans or tins. Plastic film, aerosols, cartons and foil would be added to the list of mandated materials, most likely in 2027.

Glass collection and plastic film collection and processing would need to be added to re3's current services to achieve compliance.

It was important to note some of the potential outputs and issues that could arise. It was likely that there could be a financial squeeze from producers. The elderly and disabled hadn't been factored into DEFRA's impact assessment, which was still an issue. The cost of living was a big factor, for example the three SNP candidates had recently stated that they would pause their DRS, which was ahead of the one in England, due to the cost issues involved. There were repercussive contract costs as there were certain things within the contract that may need to be changed due to the change in legislation. There was also the issue of possible changes in packaging changes and packaging being phased out which could affect what was contracted to be collected which may complicate things.

Arising from the Members comments and questions, the following points were made:

- Detailed clarity was still being awaited for glass collection. It was unsure when this would be announced, or what the precise requirements would be.
- There would be some support financially provided by the Government, this would be based again on cohorts and a formula.

- Re3 Councils could be based in different cohorts.
- The formula would be based on conditions that took into account demographics.
- The effective and efficiency calculation would drive down costs.
- It was felt best in class could be cause negativity and was a negative approach. It was suggested that a letter be drafted to DEFRA from the Board in regards to this.

RESOLVED that Members note the contents of the report.

26. **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 items 9 & 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.

27. **Financial Management Report**

The Board received the Finance Report which briefed the re3 Joint Waste Disposal Board on the Partnership's current financial position.

RESOLVED that Members note the Partnership's financial position for the current year.

28. **Contract Transition Report**

The Board received a report briefing Members on steps that would be required as the three Councils considered, planned and then delivered the transition of the contract.

RESOLVED that

- Members note the contents of the report.
- Members endorse the contents of the draft Transition Plan and the proposal for indicative costs and timelines to be presented to the re3 Board (as at paragraphs 5.21 to 5.23).
- Members incorporate future reports on Transition, in its agenda for future meetings of the re3 Board.

29. **Date of the Next Board Meeting**

Thursday 15 June 2023 at Reading Borough Council.

CHAIRMAN

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TO: JOINT WASTE DISPOSAL BOARD
15th June 2023

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 RECOMMENDATIONS

2.1 That Members note the contents of this report.

2.2 That Members review the proposed revisions to charges for non-household waste, described at 5.15, and confirm if these should be implemented to deliver full cost recovery.

2.3 That Members instruct Officers to proceed with the 'WEEE bank' project, as described from 5.21; to roll out a network of collection points for small electrical appliances.

2.4 That Members agree to receive a report on the implications of the coffee pod recycling service, 6 months after its launch at the Recycling Centres.

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 The provisional full year recycling rates for 2022/23 are presented below, alongside a comparison with the full year of 2021/22.

	2021/22	2022/23	Change
BFC	56.2%	54.5%	-1.7%
RBC	51.5%	49.5%	-2.0%
WBC	54.2%	52.9%	-1.3%

5.2 Members will observe a decrease in the recycling rates of all three councils.

5.3 In Bracknell, residual waste tonnages have only fallen by 1% whilst recyclables tonnages have fallen by 7%. The biggest overall reductions have been in kerbside green waste, food waste, mixed dry recycling and bring bank tonnes.

5.4 In Reading, residual waste tonnages have fallen by 3% whilst recyclables tonnages

have fallen by 8%. The biggest overall reduction has been in food waste, but mixed dry recycling and bring bank tonnes have also seen reductions.

- 5.5 In Wokingham, residual waste tonnages have fallen by 8% whilst recyclables tonnages have fallen by 15%. The biggest overall reduction has been in garden waste, but mixed dry recycling, food waste and bring bank tonnes have also seen reductions.
- 5.6 A full breakdown of the tonnages is shown in Appendix 1, alongside some further narrative.
- 5.7 Officers will continue to monitor and report the recycling rates and any national trends.
- 5.8 The full year contamination rates for 2022/23 are also presented below, alongside a comparison with the full year of 2021/22. This table relates to the level of incorrect items found within the mixed dry recyclables (MDR) collected from the kerbside. This information is compiled through statutory sampling of the waste.

	2021/22	2022/23	Change
BFC	15.4%	14.7%	-0.7%
RBC	17.9%	22.9%	5.0%
WBC	12.7%	14.1%	1.4%

- 5.9 It is important for levels of contamination to be reduced, as the presence of incorrect items in the MDR can make it harder for the Material Recycling Facility (MRF) to process the good recyclables effectively.
- 5.10 The full composition of the 2022/23 samples is presented in Appendix 2, with the top contaminants highlighted in yellow.
- 5.11 Analysis of the data shows that the contamination rate in Reading has risen as a result of an increase in the 'general rejects' category.

Review of HWRC Charges

- 5.12 Whilst Local Authorities are required to accept household waste without charge at their Recycling Centre facilities, there is currently no obligation to accept construction and demolition waste. This is classed as industrial waste for the purposes of providing Recycling Centres and can include waste materials created from home improvements such as hardcore, soil from landscaping activities, plasterboard, and asbestos.
- 5.13 Charges for these waste types are not uncommon at Recycling Centres and a review of policies in place at neighbouring Council facilities is included at Appendix 3.
- 5.14 For re3, charges for these materials are designed to recover the cost of handling and disposing of non-household waste and are non-profit making. The charges also ensure that the person benefitting from the works funds the cost, rather than this being covered by all taxpayers.
- 5.15 As a result of increased costs, Officers reviewed the prices being charged for disposal of non-household waste at the re3 Recycling Centres. To ensure that costs could be fully recovered in 2023/24, Officers proposed that the price for soil and rubble should increase from £2.50 to £3.00, for each 25L unit. The charges for non-household soil and rubble were previously set at £3 per 25L bag between October 2018 and April 2021.

- 5.16 At the March meeting of the JWDB, Members instructed Officers to present further details on the implications of the charges, and the likely impact if these were to be removed. Prices have remained at £2.50 in the meantime.
- 5.17 Officers can confirm that the income from the soil and rubble charges was £90k in 2022/23; based on a charge of £2.50 per 25L unit. If these charges had not been in place, overall costs to the Council would have been higher by this amount.
- 5.18 It should be noted that these figures are only a partial reflection of the impact of the charges. Tonnages of soil and rubble received at the re3 Recycling Centres fell significantly when charges were introduced in 2016. It is difficult to state the precise impact of the introduction because other operational changes (most notably the introduction of commercial and commercial type vehicle permits) were made in the same year. However, the combined extent of the reduction can be seen in Appendix 4.
- 5.19 It is likely that the tonnages of soil and rubble would increase significantly if the charges to residents were to be removed. The cost per tonne for handling and disposing of soil and rubble in 2023/24 is £106.69. Therefore, every additional 1,000 tonnes of soil and rubble could cost the re3 Councils up to £106,690. (This is an upper limit. Soil from gardening activities is not chargeable and staff do not charge for non-household soil and rubble where quantities of less than 25L are deposited. Therefore, for every 1,000 tonnes, only a proportion is chargeable.)
- 5.20 Members are invited to consider whether soil and rubble prices should remain at £2.50 per unit for the remainder of 2023/24, be increased to £3 per unit, or be removed (at a future date, to be agreed).

WEEE (Waste Electrical and Electronic Equipment) Banks

- 5.21 At the January meeting of the Joint Waste Disposal Board, Members instructed Officers to investigate the idea of using a network of recycling banks to collect small electrical appliances (such as kettles, irons and hairdryers). Such banks would provide a convenient service for residents, which could encourage them to dispose of electrical items in the correct manner. This in turn could help to maximise the recycling rate; and reduce the risk of fires caused by the incorrect disposal of items containing batteries at the re3 facilities.
- 5.22 Officers held meetings with other local authorities who already operate a bring bank service for electrical items, and with the re-processor who currently collects these items from the recycling centres. An application for funding was subsequently submitted to the Material Focus WEEE fund covering the anticipated cost of renting and operating 30 banks across the re3 area, until 2031. It also factored in the costs of communicating and monitoring the service and supporting local repair cafes.
- 5.23 An initial review of the standard Material Focus contract has already been conducted by the legal team at Bracknell Forest Council and a further review will take place once the contract has been populated for re3. To cover off any procurement risk, Officers are in the process of seeking some additional quotes from re-processors to ensure that the best value option is ultimately progressed. Once this process is complete, further discussions will take place with Material Focus, and with the appointed contractor. It is recommended that Members instruct Officers to progress with the project and install banks for small electrical appliances across the re3 area, subject Material Focus being happy to fund the initiative.
- 5.24 re3 Officers have been liaising with colleagues in the waste collection teams so that a

list of preferred locations for the banks can be drawn up. Each location considered is an existing glass bank site so that the need for additional monitoring is reduced and existing knowledge could be used to determine suitability. Officers have sought to focus on areas where residents may find it hard to access the recycling centres, but also to ensure that there is a good spread of banks across the re3 and council areas. In addition, sites have been considered with the following aims in mind:

- High foot fall.
- Low risk of vandalism.
- Space to accommodate a bank
- Land-owner approval

- 5.25 The service will be promoted through social media, newsletters, recycling centre adverts, digital audio campaigns and council magazines. A photo competition could also be considered. With good communication, it is estimated that between 8 and 10 tonnes of small electrical items could be collected through the network of re3 banks each month.
- 5.26 Subject to Members happy to proceed, Officers will share the proposed list of bring bank sites for approval and keep Members informed as the project develops. It is anticipated that the banks will be rolled out in more than one stage, but with the first batch hopefully in place over the summer.

Coffee Pod Recycling

- 5.27 The Podback service was created by the producers of some of the UK's most popular coffee brands to help facilitate recycling of the plastic and aluminium coffee pods which are used in machines at home to create café-quality drinks. These pods have historically been difficult to recycle because they are small, light, still contain coffee granules after use, and have a film lid. The Podback scheme seeks to bring the coffee industry together to create a single recycling solution.
- 5.28 During 2021, Officers looked into kerbside collection options for coffee pods through the Podback scheme but it was not possible to find a suitable service that the pod collections could operate alongside. Officers expressed interest in an alternative service at the Recycling Centres, but this was not the focus of the Podback scheme at the time.
- 5.29 Trials at recycling centres have since commenced and Podback have invited re3 to take part, following the previous discussions. The re3 trial will sit alongside trials at two other councils and is intended to establish resident participation.
- 5.30 Approximately 80% of UK coffee pod brands will be targeted through the scheme and re3 residents will be invited to bring these to the Recycling Centres, alongside their other wastes. The pods will then be collected by Podback and taken away so that the coffee can be extracted and sent for anaerobic digestion. The plastic and metal will be recycled within the UK and a full duty of care/spot market audit report will be conducted before the service commences.
- 5.31 There will be no cost to re3 in participating, and the service will be managed by FCC. In the event of any issues, the re3 Partnership will terminate the arrangement. However it is anticipated that this should be a straight-forward and positive addition to the Recycling Centre service.
- 5.32 The service is likely to commence in July 2023 and it is recommended that Members review the progress of the project, via a report to the re3 Board, approximately six

months after this date.

Consultation: Near Elimination of biodegradable waste disposal in landfill from 2028

- 5.33 Government is consulting on the aspiration to reduce to near zero the use of landfill for the disposal of biodegradable waste, from 2028. The call for evidence opened on 26th May and will close on 7th July 2023.
- 5.34 Although it has not been possible to prepare responses to the consultation questions in time for the re3 Board meeting, it is proposed that the re3 partnership makes a submission of evidence before the deadline on July 7th.
- 5.35 The principle of achieving near zero landfill is a positive one, and an aspiration which corresponds closely to the original aims of the re3 partnership. However, as with other recent legislation, it is not completely clear how this aspiration will act coherently with other, previously announced legislative objectives.
- 5.36 As Members may be aware, Government consulted, in 2022, on the introduction of an emissions trading levy for energy from waste (EfW) plants. The purpose of the levy would be to encourage carbon capture and storage technology to be incorporated (retrospectively or through the design of new plants) in the EfW process. Unfortunately, there are queries over whether that technology can be introduced without significant costs. Accordingly, and in the absence of available alternatives, the levy would have the impact of a tax for many users of EfW plants, such as local authorities. The re3 Project Team estimated that the cost of the levy could be over £2mpa.
- 5.37 There is a clear operational relationship between a significant reduction in the use of landfill and the introduction of an emissions trading levy. Both are important choices by the Government, which can be justified on environmental grounds. However the first will initially drive an increase of material which would qualify for the latter.
- 5.38 A draft response will be shared with the councils before the deadline and for consideration by Members.

6 ADVICE RECEIVED FROM ADMINISTERING AUTHORITY

Head of Legal Services

- 6.1 None for this report.

Corporate Finance Business Partner

- 6.2 None for this report.

Equalities Impact Assessment

- 6.3 None.

Strategic Risk Management Issues

- 6.4 None

Climate Impact Assessment

6.5 None.

7 CONSULTATION

7.1 Principal Groups Consulted

Not applicable.

7.2 Method of Consultation

Not applicable.

7.3 Representations Received

Not applicable.

Background Papers

JWDB Reports - March 2023

Contacts for further information

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APPENDIX ONE – Waste Tonnage Breakdown

Bracknell Forest Council

Tonnes						
Waste	Source	2021/22	2022/23	Tonnage Change	Percentage Change	Notes
Residual Waste	Kerbside Residual	16200.43	16029.03	-171.40	-1%	
	HWRC Residual	2300.12	2389.76	89.65	4%	
	Other Residual	822.58	727.12	-95.46	-12%	Partially a reduction in bulky waste
	MDR Rejections	1681.51	1714.82	33.31	2%	
	HWRC Non-Recycled	180.40	175.61	-4.79	-3%	
Recyclable Waste	Kerbside MDR	6041.81	5379.62	-662.19	-11%	
	Other Council Collected	583.23	965.30	382.07	66%	Mainly due to increased street sweeping tonnages
	Bring Banks	3597.96	2976.07	-621.89	-17%	Mainly reduced glass
	HWRC Card	416.38	424.66	8.28	2%	
	HWRC Scrap metal	521.92	531.92	10.00	2%	
	HWRC Wood	1638.26	1719.31	81.05	5%	
	HWRC WEEE	543.99	570.22	26.23	5%	
	HWRC Other	513.10	530.87	17.77	3%	
Composting	Kerbside Food	5983.10	5362.96	-620.14	-10%	
	Kerbside Garden	5562.40	4943.16	-619.24	-11%	
	HWRC Garden	1533.77	1474.88	-58.89	-4%	
	Other	240.05	331.94	91.89	28%	Caused by increased street sweeping tonnages

Summary

		2021/22	2022/23	Tonnage Change	Percentage Change
Total		48361.02	46247.26	-2113.76	-4%
By Waste	Residual	21185.04	21036.35	-148.69	-1%
	Recyclable and Compostable	27175.98	25210.92	-1965.06	-7%
By Source	HWRC Total	7647.95	7817.24	169.30	2%
	Kerbside Total	35469.25	33429.59	-2039.66	-6%
	Bring Banks	3597.96	2976.07	-621.89	-17%
	Other	1645.87	2024.36	378.50	23%

Reading Borough Council

Tonnages

Waste	Source	2021/22	2022/23	Tonnage Change	Percentage Change	Notes
Residual Waste	Kerbside Residual	21681.56	21384.68	-296.88	-1%	
	HWRC Residual	1844.80	1764.67	-80.13	-4%	
	Other Residual	1533.60	1197.47	-336.13	-22%	Mainly a reduction in litter and street sweepings
	MDR Rejections	2133.78	2272.51	138.74	6%	
	HWRC Non-Recycled	161.11	175.83	14.71	8%	
Recyclable Waste	Kerbside MDR	7649.96	7139.53	-510.44	-7%	
	Other Council Collected	684.60	270.66	-413.94	-60%	Mainly a reduction street sweepings
	Bring Banks	3074.46	2671.21	-403.25	-13%	Mainly reduced glass - but textiles too.
	HWRC Card	397.22	412.48	15.26	4%	
	HWRC Scrap metal	577.05	592.01	14.96	3%	
	HWRC Wood	1873.35	1937.11	63.76	3%	
	HWRC WEEE	559.60	604.81	45.21	7%	
	HWRC Other	580.23	523.20	-57.03	-11%	Mainly increased due to the introduction of rigid plastics. Some other areas have declined.
Composting	Kerbside Food	7542.70	6429.74	-1112.96	-15%	
	Kerbside Garden	4154.64	3860.63	-294.01	-7%	
	HWRC Garden	1530.97	1313.35	-217.62	-14%	
	Other	368.68	488.81	120.14	25%	Caused by an increase in schools' food waste

Summary

		2021/22	2022/23	Tonnage Change	Percentage Change
Total		56348.31	53038.69	-3309.62	-6%
By Waste	Residual	27354.85	26795.16	-559.69	-2%
	Recyclable and Compostable	28993.46	26243.54	-2749.92	-9%
By Source	HWRC Total	7524.33	7323.45	-200.88	-3%
	Kerbside Total	43162.64	41087.09	-2075.56	-5%
	Bring Banks	3074.46	2671.21	-403.25	-13%
	Other	2586.88	1956.94	-629.93	-24%

Wokingham Borough Council

Tonnages

Waste	Source	2021/22	2022/23	Tonnage Change	Percentage Change	Notes
Residual Waste	Kerbside Residual	25319.83	23989.03	-1330.80	-5%	
	HWRC Residual	3528.80	3000.23	-528.57	-15%	
	Other Residual	1457.88	1278.83	-179.06	-12%	Mainly a reduction in litter
	MDR Rejections	2157.42	2443.27	285.85	12%	
	HWRC Non-Recycled	297.59	259.87	-37.72	-15%	
Recyclable Waste	Kerbside MDR	7750.82	6788.04	-962.77	-12%	
	Other Council Collected	782.45	739.26	-43.19	-6%	Caused by lower recyclable content in the street sweepings
	Bring Banks	4026.40	3657.99	-368.41	-9%	Mainly reduced glass - but textiles too.
	HWRC Card	695.67	608.79	-86.89	-12%	
	HWRC Scrap metal	943.14	820.19	-122.96	-13%	
	HWRC Wood	3012.48	2665.11	-347.38	-13%	
	HWRC WEEE	970.53	866.33	-104.20	-12%	Mainly a reduction in large WEEE
	HWRC Other	944.89	771.87	-173.02	-22%	Down across a range of items
Composting	Kerbside Food	6425.57	6082.18	-343.39	-5%	
	Kerbside Garden	10282.66	9236.40	-1046.26	-10%	
	HWRC Garden	2623.49	2023.18	-600.31	-23%	
	Other	348.38	487.09	138.71	28%	Caused by an increase in street sweeping tonnages and a higher compostable content.

Summary

		2021/22	2022/23	Tonnage Change	Percentage Change
Total		71568.00	65717.65	-5850.35	-8%
By Waste	Residual	32761.53	30971.23	-1790.29	-5%
	Recyclable and Compostable	38806.47	34746.42	-4060.06	-10%
By Source	HWRC Total	13016.60	11015.56	-2001.04	-15%
	Kerbside Total	51936.30	48538.93	-3397.37	-7%
	Bring Banks	4026.40	3657.99	-368.41	-9%
	Other	2588.71	2505.17	-83.53	-3%

Waste Tonnage Narrative

Point	Description
1	Total household waste arisings have reduced for all three councils. This may be related to the costs of living.
2	The recyclable waste tonnages have reduced more than the residual waste tonnages, leading to the drop in overall recycling rates.
3	Most of the tonnage reduction has been seen at the kerbside.
4	Food waste tonnes have reduced across all three councils, but especially in Bracknell and Reading, where the collections were new last year. One factor may be increased consciousness of food waste as a result of participation in the service. Another factor may be the cost of living.

5	All three councils have also seen a reduction in their Mixed Dry Recycling (MDR tonnages), but there has also been an increase in the rejection levels seen overall. This is a reflection of total contamination and process rejects in the plant.
6	Garden waste tonnages have fallen, and this could be linked to the dry weather seen in the summer. Although the kerbside tonnages in Reading have reduced less than seen in Bracknell and Wokingham, it should be noted that the collection service was suspended for a period during 2021.
7	Bring bank glass tonnages are declining but are still above pre-pandemic levels, so could continue to fall.
8	A much larger decrease is seen in the recycling centre tonnages for Wokingham than for the other two councils. Tonnages have reduced at both recycling centres, but changes in tonnage allocation, linked to patronage data, result in less of a tonnage change being seen in Bracknell Forest and Reading. Although tonnage has changed, the recycling rate at both recycling centres has remained constant between the two years.

APPENDIX TWO – Composition of ‘Mixed Dry Recycling’ (2022/23)

Contamination Category	Material	Bracknell	Reading	Wokingham
Target Recycling	News & Pams	13.18%	14.90%	18.38%
	Mixed Paper	6.57%	6.34%	7.01%
	Card	40.14%	34.44%	36.54%
	Tetrapak	1.53%	1.37%	1.52%
	Steel Cans & Tins	4.10%	3.40%	3.87%

	Aluminium Cans & Tins	3.14%	2.36%	2.67%
	Aluminium Trays & Foil	0.22%	0.14%	0.18%
	PET Clear Bottles	5.19%	4.66%	4.77%
	PET Clear Trays	2.38%	2.16%	2.82%
	Mixed Plastics	4.28%	3.43%	4.04%
	HDPE	3.29%	2.65%	3.18%
	Particulates	1.26%	1.29%	0.88%
	Non-Target Paper	0.50%	0.28%	1.15%
	Non-Target Card	1.08%	1.33%	1.29%
	Ferrous Metal	0.37%	0.64%	0.22%
Contamination	Non-Ferrous Metal	0.00%	0.00%	0.01%
	Polypropylene (PVC)	0.00%	0.01%	0.00%
	Plastic Film (LDPE)	1.17%	1.32%	1.40%
	Rigid Plastics	0.57%	0.95%	0.54%
	Textiles & Shoes	0.59%	0.65%	0.31%
	WEEE	0.04%	0.22%	0.04%
	Wood	0.20%	0.43%	0.21%
	Plasterboard	0.00%	0.04%	0.00%
	DIY Rubble/Ceramics	0.00%	0.03%	0.01%
	Garden Waste & Soil	0.11%	0.01%	0.00%
	Glass	1.00%	2.07%	0.75%
	Food Waste	0.02%	0.23%	0.14%
	Disposable Nappies	0.04%	0.11%	0.06%
	Hazardous Waste	0.00%	0.00%	0.00%
	Foils wrapping paper, wall paper	0.15%	0.05%	0.04%
	Black Plastics	0.28%	0.32%	0.38%
	General rejects (Bags with waste)	1.87%	6.51%	2.60%
	General Rejects (other)	4.20%	5.03%	3.22%
	Particulates	2.52%	2.58%	1.83%
		Total Contamination	14.71%	22.85%
	Total %	100.00%	100.00%	100.00%

Please note:

- The top 5 contaminants have been highlighted for each Council.
- Non-target paper and card is often wet.
- The 'General rejects (bags with waste)' category relates to any bags containing a mix of household waste. Recyclable waste may be present in some cases, alongside other waste types such as food.
- The 'General rejects (other)' category contains all contamination not otherwise listed. It might include materials such as crisp packets, crisp tubes, pill packs, wet wipes and face masks. Where items have been placed inside one another and cannot be separated, these will also fall into this category.
- Particulates are items too small to be sampled. The main particulate is usually loose shredded paper.

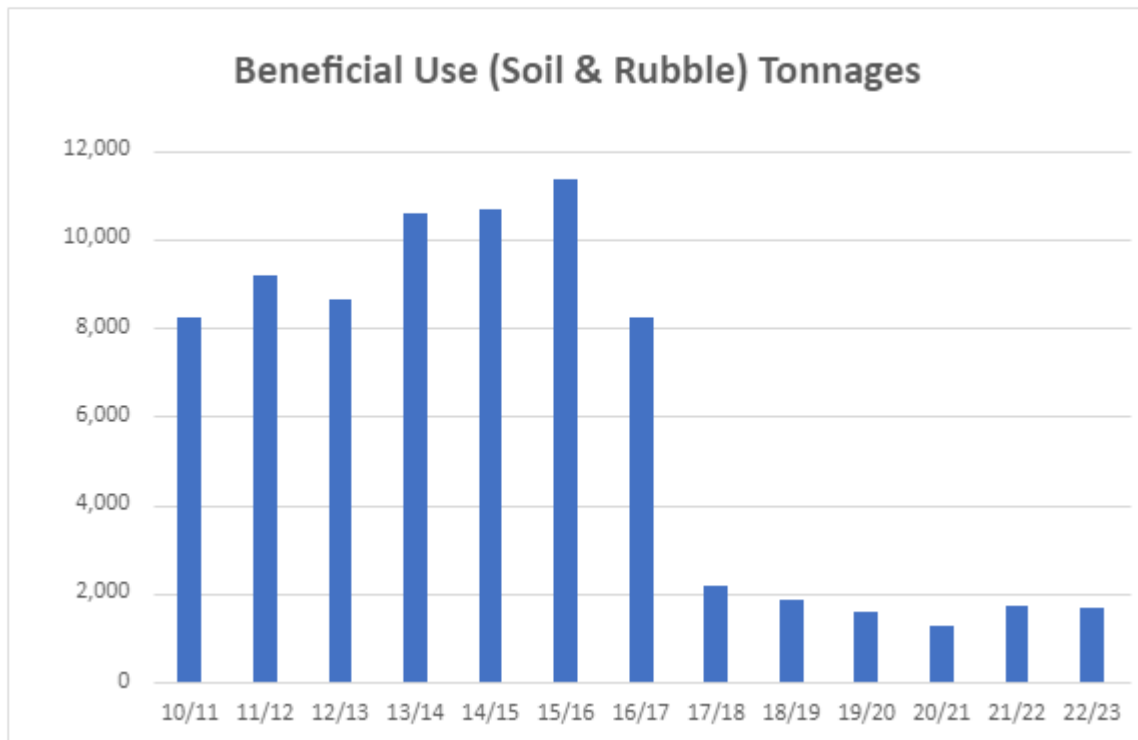
APPENDIX THREE – Recycling Centre Charges

Council	Rubble	Soil
Buckinghamshire Council	£3.50 per 25L unit	£3.50 per 25L unit
Hampshire County Council	£3 per standard rubble bag or per item of sanitary ware	£3 per standard rubble bag
Oxfordshire County Council	£2 per 20L bag or per bathroom or kitchen item	£2 per 20L bag
Slough Borough Council	£3.70 per 25L bag	None Found

Surrey County Council	£4 per bag (50cm x 77cm)	£4 per bag (50cm x 77cm)
West Berkshire Council	£2.70 per 25L bag	£2.70 per 25L bag
Windsor and Maidenhead Council	None Found	None Found

Data obtained from council websites on 25/05/2023.

APPENDIX FOUR – Soil and Rubble Tonnages



Charges for soil and rubble were introduced in September 2016.

TO: JOINT WASTE DISPOSAL BOARD
15th June 2023

COMMUNICATIONS 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 the Partnership's communications activities, since the last meeting.

2 RECOMMENDATIONS

- 2.1** That Members note the contents of this report.
- 2.2** That Members approve the recommendation, as described at point. 5.19, to commission and adopt Scripp as the partnership App.

3 ALTERNATIVE OPTIONS CONSIDERED

- 3.1** None for this report.

4 REASONS FOR RECOMMENDATION

- 4.1** The purpose of the recommendation is to brief Members in relation to progress in delivery of communications activities.

5 PROGRESS IN RELATION TO COMMUNICATIONS ACTIVITIES

Recycling Centres inclusion campaign

- 5.1** A press release informing the public that the online booking system webform has been enhanced by integrating translation services for over 130 languages was issued to the local press.
- 5.2** The new feature aims at improving accessibility and clarity for residents whose first language is not English.
- 5.3** The accessibility of the Recycling Centre has been advertised via targeted social media campaign aimed at multicultural audiences (non - English speakers) living locally. Within the month of the campaign the adverts (see Appendix 1a) reached 48,800 accounts. Social media adverts will be optimised and run until the end of June.
- 5.4** An advert promoting the availability of the booking form in different languages, as well as presenting some inclusive services such as Paint Reuse and the Reuse Area, was placed in the "Your Reading" magazine, which has been distributed to residents across Reading, as shown in Appendix 1b. Advertising space in the Summer issue of the Town & Country (Bracknell magazine) has been booked.
- 5.5** To further promote recycling to residents whose first language is not English, re3 has also published recycling leaflets with advice on its website in the following languages: Arabic, Polish, and Urdu (Appendix 1c)

- 5.6 The leaflets, along with prepared adverts and key information about the Recycling Centre, were shared with New Beginnings College and Reading Community Learning Centre, and displayed on their notice boards, digital screens and shared via their direct communications with students attending the English language classes.
- 5.7 re3 contacted some local organisations that support ethnic communities living locally with a query to help distribute relevant materials. Contacted organisations include ACRE Reading, Al Majid Centre, Sudanese Community Group and Reading Refugee Support Group. re3 is consulting listed organisations individually to tailor communications materials and form of their delivery. As a next step, re3 Officer will also work with colleagues to identify equivalent groups across two other councils.

Recycling App

- 5.8 The re3 partnership has been using a bespoke app called re3cyclopedia (Appendix 2.a) since 2018. The app enables residents to look-up common items, to check their recyclability. In addition, residents can use the app to access the councils' and re3's websites, to access services and check information.
- 5.9 The recycling app has been well-used by residents and plays an important role in tackling contamination as well as providing an access point to services.
- 5.10 Accessibility of the information and addressing the contamination of recycling is critical to ensure that our recycling is of high quality and service runs efficiently. The contamination level across the partnership continues to be approximately 17.3%. The incorrect disposal of waste costs re3 councils approximately £487k per year. Therefore, we recommend keeping the recycling app in the re3 portfolio.
- 5.11 Earlier this year, re3 Officers undertook a review of the contract with the current provider. It was identified that, the app performs well, however its technological capacity is limited, making it difficult to stay relevant and engaging.
- 5.12 Officers undertook some research into available alternative recycling apps. This led us to identify a new platform called [Scrapp](#), that offers significantly more functionality.
- 5.13 The Scrapp mobile app allows residents to scan any product to see the local recycling rules, in real-time. The Scrapp barcode database currently lists 37k products vs 5k within the re3cyclopedia; however, thanks to the artificial intelligence (AI) technology used, there will be 34m products available for resident searches, by September 2023.
- 5.14 In addition, the users can search for items manually, using the A-Z waste search which includes a wide catalogue of products including items that do not have barcodes ie furniture.
- 5.15 Scrapp also has a wider range of features than re3cyclopedia including:
- Bin day reminders and a much more user-friendly interface.
 - Tailored notifications to residents allowing for a new way of engagement, about any relevant service changes
 - Searches for the nearest bottle bank, plastic bag and wrapping recycling points, or Terracycle drop-off points.
 - Carbon emissions insights,
 - Notifications and gamification, helping to engage within residents and neighbourhoods. (Appendix 2.b)

- 5.16 In addition, the council will receive an access to the detailed dashboard with a breakdown of the searched for items as well as related aggregate CO2 impacts. These insights are of particular interest when building communications messages to residents (Appendix 2.c).
- 5.17 The app has international coverage, currently covering 100% of the UK, USA, and Canada.
- 5.18 It's worth noting, that the developers of the app have been engaging with a variety of stakeholders to deliver options for the possible mobile solutions of the Deposit Return System (DRS). This could be of particular interest to the councils in supporting residents who wish to continue using their council, kerbside, recycling system even after a DRS in England has commenced.
- 5.19 Officer's recommend that the re3 partnership should not renew the contract for the re3cyclopedia app, and instead engage Scrappr to provide this service for the council partnership.
- 5.20 The app is available for residents to use at no cost. However, the yearly subscription cost for using the app is 25% higher compared to the fees charged by the current provider. Despite this increase, it is important to note that the higher cost is justified as more significant features are offered. The additional expense will be fully covered by the existing budget.
- 5.21 The suggested timeline will allow for successful onboarding to the new platform and an effective communications plan, providing a two-month transition period.

re3Grow Community Compost scheme

- 5.22 The re3 Community re3grow Scheme was relaunched in early March 2023.
- 5.23 The initiative was launched to promote recycling and community activities within the re3 area. To deliver this project, the re3 Partnership allocated 5,000 re3grow compost bags which are available to the local groups and organisations free of charge to support their green projects.
- 5.24 In the first year of the project, over 1,600 bags of compost were provided to 69 organisations, allowing for the use of 64,000 litres of compost, benefiting local communities and promoting recycling.
- 5.25 By the end of April 2023, further 79 organisations including 40 schools have benefited from re3grow compost bags. In total 1,340 bags were assigned to the local groups this year.
- 5.26 The initiatives and collaborative spirit demonstrated by the involved organisations and schools have been impressive. Supported projects include planting Miyawaki forest on the school grounds, growing fruits and vegetables for local food banks, nourishing local community allotments, enhancing sensory gardens at local schools, assisting less fortunate individuals in growing their own food, providing social and therapeutic horticulture sessions, and simply improving general well-being by creating more inviting outdoor spaces.
- 5.27 An infographic with the most recent summary is shown in the Appendix 3.a
- 5.28 Continuous advertising and promotion of the scheme runs on re3 channels throughout the project. This includes a bi-weekly social media update of the groups which

benefited from the re3grow compost. The sample of updates can be seen in the Appendix 3.b.

- 5.29 Simultaneously, feedback and photos received are gathered and shared publicly to increase awareness of the scheme.
- 5.30 re3grow compost has been a successful staple in the re3 circular economy initiatives since 2018. The compost is made from recycled garden waste deposited by residents and conforms to BSI PAS 100 and the Compost Quality Protocol. Before being bagged, it undergoes a 12-week composting process using open windrows, during which the garden waste is screened, shredded, and matured. One of the stages involves sanitisation, where a high temperature between 65–80°C is maintained for a minimum of 7 consecutive days to eliminate weeds, seeds, and pathogens. The re3grow compost is available for purchase by the residents at the recycling centres.

Virtual Tours - Recycling Facilities (HWRC) and Material Recycling Facility (MRF)

- 5.31 During the previous Board Meeting, the Members has expressed interested into proposed virtual tours of the re3 facilities: two Recycling Centres and Material Recycling Facility.
- 5.32 The virtual tours will enable residents to familiarise themselves with the facilities, creating a better experience when visiting and offering an educational angle to help visitors understand their waste journey.
- 5.33 Tours will include a selection of panoramic, 360-degree photos enhanced with hot spots, text, and videos that add interactivity and provide information.
- 5.34 By adding virtual tours to the website, we can offer a new way of interacting with residents.
- 5.35 The virtual tool should also be shared with the community groups and schools. We believe that it will also play a key educational role, especially for individuals under 18 years old, as we are unable to allow minors to visit the facility.
- 5.36 The results of the project will be reported during the next Board meeting.
- 5.37 Tours of the Material Recycling Facility are being offered to the members of local organisations. re3 hosted two groups since the last Board Meeting.
- 5.38 Proposed dates to visit the Material Recycling Facility will be shared with the Members, allowing to gain insights into the recycling process.

General comms activities

- 5.39 Ongoing communications activities are run on the re3 social media, and key messages are also communicated via re3 newsletter on a regular basis. Following topics were included in the recent comms: Easter recycling tips, tips on how to organise a sustainable event (during the run up to the Coronation weekend); advice how to reduce plastic contamination within the garden waste; glass recycling tips and bottle banks map and promoting Repair Café events.
- 5.40 Two articles ([Reading Today](#), [Reading Today](#)) were published in the local media, and re3 has not received any press inquiries since the last Board Meeting.
- 5.41 re3 was asked to be featured in the Chartered Institute of Waste Management (CIWM)

project showcase videos, which highlight top waste management projects in recent years. The project that caught their interest was the installation of an AI-driven robotic waste picker. The video will be presented during the President's Inauguration event later this year.

6 ADVICE RECEIVED FROM ADMINISTERING AUTHORITY

Head of Legal Services

6.1 None for this report.

Corporate Finance Business Partner

6.2 None for this report.

Equalities Impact Assessment

6.3 None.

Strategic Risk Management Issues

6.4 None

Climate Impact Assessment

6.5 None.

7 CONSULTATION

7.1 Principal Groups Consulted

Not applicable.

7.2 Method of Consultation

Not applicable.

7.3 Representations Received

Not applicable.

Background Papers

None for this report

Contacts for further information

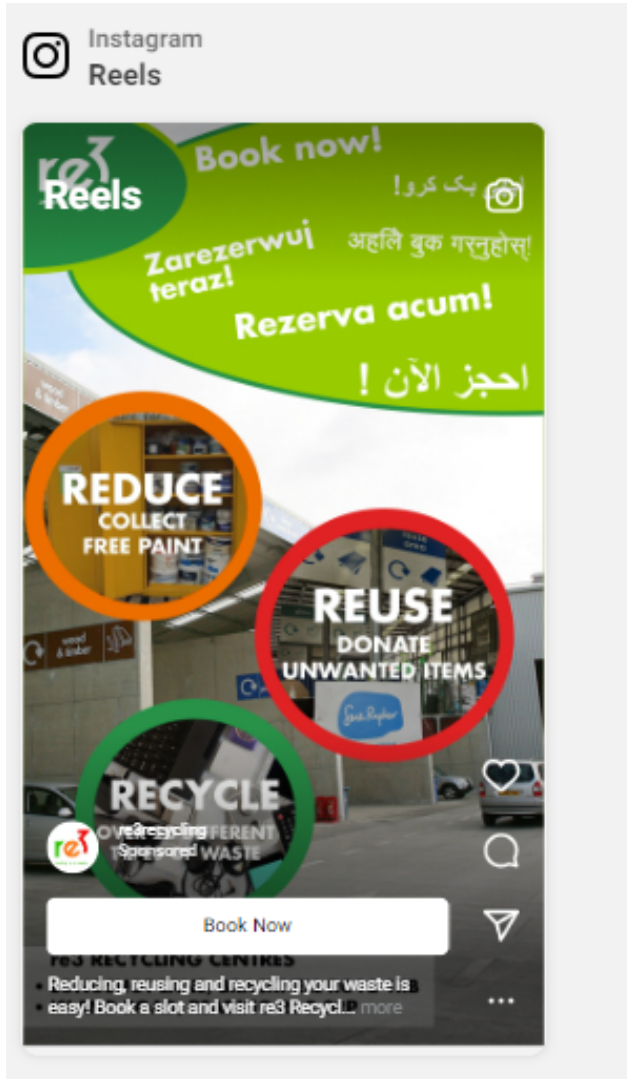
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Oliver Burt, re3 Project Director
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Appendix One

A)

30



Appendix Two

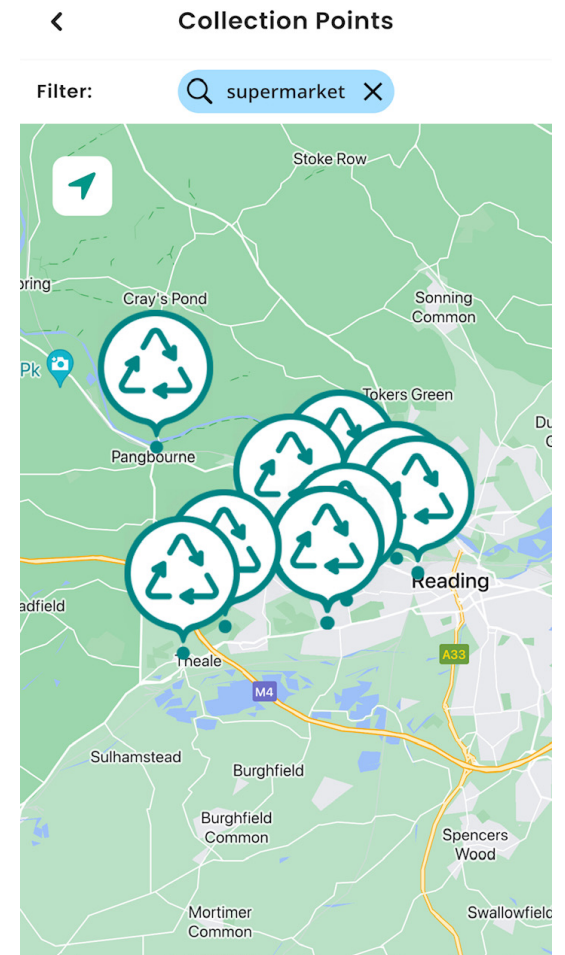
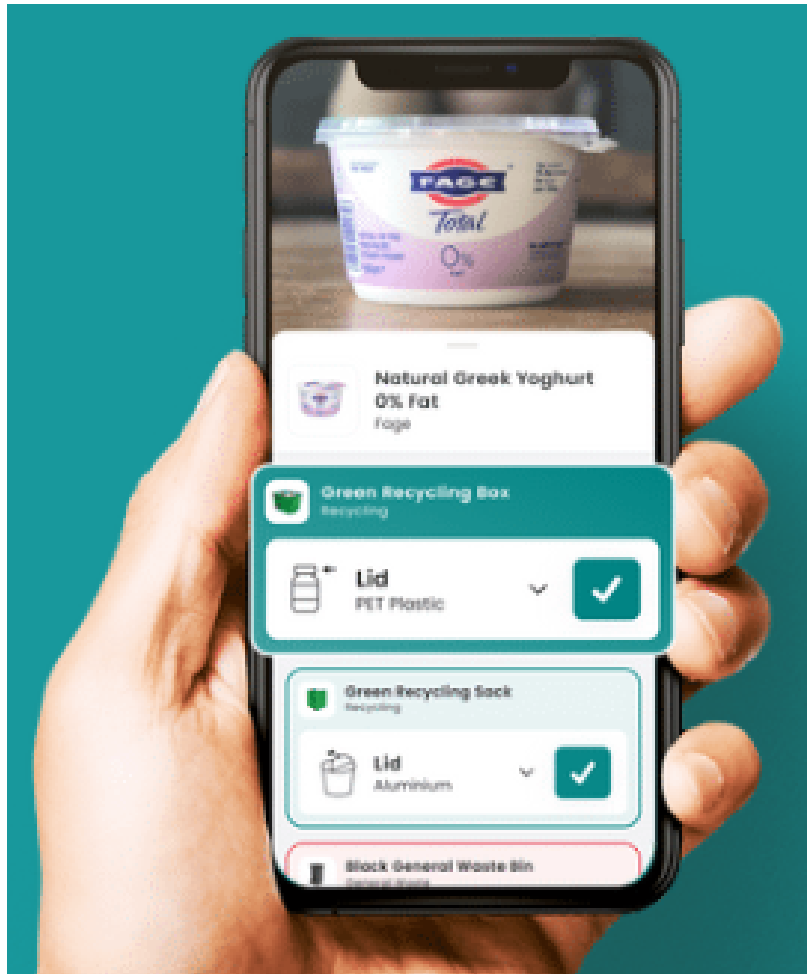
A)

32



B)

33



c)

34

Overview

You've correctly disposed of **74 items**

67% Recycled, 0% Compost, 33% Trash

Personalized activity insights are coming real soon! Stay tuned

Plastic removed **47 Bags**, New info added for **29 Items**

All together, we've recycled **14,416 items** ...Happy Earth!

Home Search Scan History Overview

Scrapp Dashboard

Edinburgh City... Admin

Items Recycled: 21,422, Landfill Diverted: 200kg, CO2e Saved: 700kg, Members: 102,620

Together, you've correctly disposed of 36,218 items

Plastic	52%
Paper	31%
Metal	16%
Glass	12%
Carton	5%
Other	2%

Local Challenge: Edinburgh's 250k Charity Cleanup (10,221 scans / 250,000 goal)

Community Insights: The recycling rate in this community is more than 5% above the national average - great job!

Appendix Three

A)

re3grow Community Scheme
April 2023 - update

Local Authority	Compost bags approved in 2023	Organisations (including schools)	Remaining bags	Total no of bags assigned/distributed
Bracknell Forest Council	275	23 organisations including 16 schools	1,017	649
Reading Borough Council	643	29 organisations including 10 schools	462	1,204
Wokingham Borough Council	422 (March)	27 organisations including 14 schools	0	1,666

B)

re3grow Community Scheme
Let's grow our communities together

APPLY NOW FOR FREE COMPOST
Applications are now open to local community groups and schools.

re3grow Community Scheme
Let's grow our communities together

APPLY FOR FREE COMPOST NOW
Applications are now open to local community groups and schools.

re3grow Community Scheme
Let's grow our communities together

APPLY FOR FREE COMPOST NOW
Applications are now open to local community groups and schools.

Community groups featured: Weller Centre, Freely Fruity, 4th Bracknell Scout Group.

Logos: re3, Bracknell Forest Council, Reading Borough Council, Wokingham Borough Council, FCC, www.re3.org.uk

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TO: JOINT WASTE DISPOSAL BOARD
15th June 2023

TRIAL COLLECTION OF FLEXIBLE PLASTIC PACKAGING **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 an opportunity to collect flexible plastic packaging from the kerbside, ahead of collections of this material becoming mandatory.

2 RECOMMENDATION

- 2.1 **That Members note the contents of this report.**
- 2.2 **That Members approve the participation of the re3 Councils in the FlexCollect Project, as described from 5.5.**
- 2.3 **That Members instruct the re3 Project Director to sign the FlexCollect contract as described at 5.21.**

3 ALTERNATIVE OPTIONS CONSIDERED

- 3.1 An alternative to participating in this trial is to await the specific detail of the Government's expectations for collecting and processing flexible plastic waste. Officers are broadly confident about what will be required, and do not expect there to be any unforeseen surprises in relation to soft/flexible plastics, when the detail is published. Waiting alongside the majority of other councils would provide more time for the councils to get ready for Borough-wide operational requirements, although the councils would forego the potential for learning during the trial and any opportunities that come from it.

4 REASONS FOR RECOMMENDATION

- 4.1 The FlexCollect Project is a research trial, seeking to understand key factors regarding the collection, sorting, processing and transport of high-volume flexible plastics. For the re3 Partnership, it would represent a fully funded research opportunity, ahead of collection of this material becoming mandatory via the Environment Act. If the trial can be developed into an ongoing service, it could help the council partnership avoid or manage capital costs that have been estimated by the Contractor, FCC, at over £2m.

5 PROGRESS IN RELATION TO WASTE MANAGEMENT

Background

- 5.1 At the January meeting of the re3 Joint Waste Disposal Board, Members asked Officers to investigate options for recycling flexible plastic packaging such as bags, films and wrappers.
- 5.2 As Members may be aware, a small number of Councils are currently trialling collections of plastic films via the Flexible Plastic Fund 'FlexCollect' Project. This project follows the proposal in the DERFA consultation on Waste Collection Consistency, for these items to be collected by all local authorities no later than March 2027. It seeks to understand a range of factors including: the volume of flexible

packaging arising from households, the impacts of collecting this material on other recyclables, the success of various communications and the costs and challenges of collecting, sorting and reprocessing this.

- 5.3 The Councils taking part in the project are required to supply a range of data to help inform best practice and, in return, benefit from funding and project management support.
- 5.4 Prompted by the specific request from the re3 Board, Officers contacted the FlexCollect team to express an interest in being part of the trial.

Operations and Communications

- 5.5 Following some successful tests in the re3 Material Recovery Facility (MRF) to establish the practicalities of sorting, storing and reprocessing the waste, the re3 Partnership has been successful in being selected to take part in the project in the second phase. Subject to approval by Members, this will see a two-year trial commence.
- 5.6 The re3 project will result in residents in the selected trial areas being given some single use plastic bags. Residents will be asked to fill these with their flexible plastics and place the tied bags within their existing recycling receptacle. These blue bags will be visible to pickers in the MRF and they will manually extract them. The bags will then be baled, and sent off for further processing in the UK.
- 5.7 The FlexCollect project was looking to select local authority participants to represent a range of geographies, social demographics, collection system and operators. Largely due to its urban nature and direct deliveries of mixed dry recycling (MDR) to the MRF, Reading Borough Council was FlexCollect's preferred location for the start of the project.
- 5.8 The first phase of the re3 project is will therefore cover around 5,000 households in the Reading Borough Council area and is due to commence in mid-July.
- 5.9 The project will be expanded to cover around 20,000 households in the second year, and re3 Officers have negotiated that these will fall equally across all three Council areas.
- 5.10 The Waste and Resources Action Programme (WRAP) have developed communication templates for the project, and these will be localised for the re3 Councils. Residents in the trial areas will receive an information leaflet a week or two before the service launch, an instructional leaflet alongside their plastic bags, and a nudge leaflet, about six weeks after the project launch. Both the instructional and nudge leaflet will be delivered by Royal Mail.
- 5.11 A draft of the Reading Borough Council Instructional leaflet is included in Appendix One for reference. Officers will also bring some printed copies along to the meeting,
- 5.12 The data to be provided by re3 will cover the collection, storage, processing and transport of the waste; including information about the composition and quantity of material collected, operational challenges and associated costs.

Funding and Procurement

- 5.13 The FlexCollect project is co-managed by a consortium comprising: Ecosurety, RECOUP (Recycling of Used Plastics Ltd), SUEZ Recycling and Recovery UK and

WRAP (The Waste and Resources Action Programme). The re3 contract will be with SUEZ (who have been appointed to manage the project for FlexCollect) and Future Recycling Limited (set up by Ecosurety to manage the project funds).

- 5.14 The project is a fully funded research opportunity with funding being provided by the Flexible Plastic Fund (composed of a number of UK's leading manufacturers), DEFRA (the Government Department of Environment, Food, and Rural Affairs) and UKRI.
- 5.15 The total value of the funding is quite significant (~£200k in total). The funding for re3 will cover expenses such as equipment hire, additional MRF staffing, printing of communications and delivery of leaflets and bags. In addition, the FlexConsortium will also receive funding to cover their expenses in managing the project.
- 5.16 The Procurement Team at Reading Borough Council noted that a procurement exercise should be carried out to ensure that FlexCollect does not receive a benefit from the project, at the exclusion of others. This is to ensure that the council ensures openness, transparency, and non-discrimination in our dealings with businesses.
- 5.17 re3 Officers have since applied for, and been granted, a waiver from the Contract Procedure Rules via the Corporate Management Team (CMT) at Reading Borough Council. Some of the key factors included in the request were as follows:
- The project is a research opportunity. The project is not designed to make money (either for re3 or FlexCollect) and there is currently no opportunity to generate an income from the sale of flexible plastics.
 - The project will not result in the FlexCollect Consortium gaining a competitive advantage in the industry. The re3 data will be aggregated with that of other local authority trials to generate guidance documents, case studies and methodologies to inform the value chain. Furthermore, the stakeholder consultative panel for the project is understood to involve members including LARAC (the Local Authority Advisory Committee) and the CIWM (the Chartered Institution of Waste Management).
 - Officers are not aware of other companies conducting similar research ahead of the change in legislation; and DEFRA has been seen to encourage all local authorities to consider expressing an interest in the FlexCollect project.
 - The project is a trial. It is limited by time and area and there is scope to withdraw from the trial by providing one month's notice (or immediately under specific circumstances).
- 5.18 The re3 MRF was not designed to process flexible plastics. If legislative compliance required retrofitting the plant, so that it could extract flexible plastic films, that could be very costly to the councils. A ballpark estimate from the re3 Contractor is upwards of £2million to amend optical sorting capacity and add additional conveyors and bunkers. Similarly, the separate collection of flexible plastic films could contribute to increased waste collection costs. Through the FlexCollect project the re3 partnership councils have an opportunity to collect this material in bags and assess if this could be a way to comply with future legislation. The FlexCollect project therefore represents an opportunity for the re3 Councils to inform future operational practice.
- 5.19 At the end of the contract and trial period (in 2025), and assuming the trial represents or identifies a sustainable service offering, it is anticipated that the councils may be able to draw on Extended Producer Responsibility (EPR) payments, through the Environment Act 2021, to support the ongoing provision of the service.

Next Steps

- 5.20 The FlexCollect initiative is a trial. If the trial goes ahead, it will give the councils and their contractors access, at no cost, to the following benefits:
- First-hand experience of a known, and soon to become mandatory, change in service (both collection and treatment/processing).
 - Immediate access to data from the trial, illustrating, for example the composition change that is likely to occur when soft, or flexible, plastics become a mandatory part of recycling collections.
 - The specific occasion to liaise with trial groups of residents, to understand their opinions on and experiences of, recycling this material type – and related topics.
- 5.21 It is therefore recommended that Members direct Officers to proceed with implementation and instruct the re3 Project Director to sign the contract for the trial on behalf of the partnership.
- 5.22 At the time of writing this report, Officers are continuing to prepare for implementation of the project including; seeking sign-off for the communication leaflets, developing an 'order form' for residents to request additional bags and working with FCC to ensure that baling equipment is installed and that risk assessments are updated. Officers are also continuing to liaise with the Reading Borough Council Legal Team, and the Project Manager at Suez in relation to the contract drafting.
- 5.23 Subject to Members being happy to support the project, and all legal matters having been satisfactorily concluded, it is proposed that the Contract be signed on, or around, the 16th of June. This will enable pre-commencement communications to commence before many residents start to go away for the summer holidays.

ADVICE RECEIVED FROM ADMINISTERING AUTHORITY

Head of Legal Services

- 6.1 As referenced at 5.22, Officers are continuing to liaise with the Reading Borough Council Legal Team, in relation to the contract drafting, at the time of writing this report. Officers are providing information to help determine compliance with the Subsidy Control Act, management of Intellectual Property Rights and ensuring suitable cover around liability and insurance. Officers will seek to ensure that all outstanding queries have been resolved at the time of the June meeting.

The primary concern from the legal and procurement team related to the need for a procurement exercise to take place, and this has since been resolved through the provision of a waiver, as described at 5.17.

Corporate Finance Business Partner

- 6.2 None for this report.

Equalities Impact Assessment

- 6.3 None.

Strategic Risk Management Issues

- 6.4 None

Climate Impact Assessment

6.5 None.

7 CONSULTATION

7.1 Principal Groups Consulted

Not applicable.

7.2 Method of Consultation

Not applicable.

7.3 Representations Received

Not applicable.

Background Papers

JWDB – March 2023

Contacts for further information

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APPENDIX ONE – Instructional Leaflet



Welcome to your new plastic bags and wrapping recycling collection trial

We're making it easy for you to recycle your plastic bags and wrapping by trialling a recycling collection from your home. The trial is currently available to a small number of residents, but it will expand to more residents by 2024.

From 10 July, your plastic bags and wrapping will be collected as part of your normal recycling collection so that we can all recycle better, together. For each other. For Reading.

Along with this leaflet we have delivered a pack of blue collection bags. Place only your plastic bags and wrapping in the blue collection bag, tie it securely, and place inside your recycling bin.

Your plastic bags and wrapping will be collected as part of your normal recycling collection.

If you need more collection bags, visit reading.gov.uk/waste and use our order form.

Please only use the blue collection bags provided and not any other bag.



Why are we collecting plastic bags and wrapping?

Creating new products from recycled plastic provides many benefits to the environment. Almost all virgin plastic comes from fossil fuels, and the process of manufacturing plastic creates millions of tonnes of greenhouse gases every year which harms the environment.

Recycled plastic bags and wrapping can be used to make a range of new plastic products such as, plastic packaging, 'bags for life', boxes, bins, and agricultural and construction materials, reducing the reliance on virgin plastic.

What will I be able to recycle?

All items should be **clean** and **free of food**.

	<p>All plastic bags</p> <ul style="list-style-type: none"> Carrier bags Salad/fruit/vegetable Frozen food Bread Cereal Flowers 		<p>Cheese, fish, and meat wrapping</p>
	<p>Confectionery wrappers</p> <ul style="list-style-type: none"> Chocolate Sweets Biscuits Cakes Ice cream and chewing gum wrappers 		<p>Outer layer bags and wrapping</p> <ul style="list-style-type: none"> Multipack Toilet and kitchen roll Magazine and newspaper wrapping
	<p>Foil lined packaging</p> <ul style="list-style-type: none"> Crisp/snack packets Coffee bags 		<p>Plastic film and sleeves</p> <ul style="list-style-type: none"> Removeable film lids Plastic sleeves for bottles and jars
			<p>Bubble wrap and cling film</p>
			<p>Fruit and vegetable net bags</p>

Please DO NOT use your collection bag for:

Items other than plastic bags and wrapping

- ✗ Blister packs, pills, and tablets packaging
- ✗ Compostable or biodegradable bags and wrapping
- ✗ Crisp tubes
- ✗ Disposable gloves or masks
- ✗ Foam or polystyrene of any kind
- ✗ Plastic bottles, pots, tubs, or trays*
- ✗ Plastic straws or cutlery
- ✗ Pouches, sachets and packets
- ✗ Ready meal or fresh meat and fish containers or trays*

*You can still recycle these items by placing them loose in your recycling.

Frequently asked questions

Why do I have to put plastic bags and wrapping in the collection bag? Why can't I just put my plastic bags and wrapping loose in my recycling bin?

The process for recycling plastic bags and wrapping is different to recycling other plastic packaging. Therefore, plastic bags and wrapping need to be grouped together so that they can be sorted effectively during the recycling process.

Why have you introduced a plastic bags and wrapping recycling collection service?

We've introduced a new trial service to help make recycling plastic bags and wrapping easier for you. Currently in the UK, only 6% of plastic bags and wrapping are recycled. Offering this service helps you and the rest of Reading to recycle better, together. The trial is currently available to a small number of residents, but it will expand to more residents by 2024.

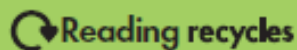
Can I still take my plastic bags and wrapping to front of store points to recycle?

Now that a plastic bags and wrapping recycling collection trial is available from your home, you should use the kerbside service to recycle those items.

Can I put all types of plastic bags and wrapping in the recycling collection?

We accept all types of plastic bags and wrapping listed in this leaflet, as long as they fit inside the blue collection bag. Please do not put plastic bags and wrapping loose in with your other recycling. Remember to always use your blue collection bag, and tie it securely.

For more information, please visit
recyclenow.com/plastic-wrapping



If you have queries about this new collection, need information in another language or require Easy to Read format, contact us:

Visit: reading.gov.uk/waste
Call: 01189 373 787

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TO: JOINT WASTE DISPOSAL BOARD
15th June 2023

Re3 DEPOSIT RETURN SCHEME CORRESPONDENCE REPORT **Report of the re3 Project Director**

1 INTRODUCTION

- 1.1 The purpose of this report is to provide Members of the re3 Board with a briefing on correspondence, from the re3 Board to Rebecca Pow MP, Minister for Environmental Quality and Resilience, on the subject of the planned Deposit Return Scheme (DRS) for some recyclables.

2 RECOMMENDATIONS

- 2.1 **That Members note the contents of this report.**

3 ALTERNATIVE OPTIONS CONSIDERED

- 3.1 None for this report.

4 REASONS FOR RECOMMENDATIONS

- 4.1 The purpose of this report is to share with Members the response from the Minister for Environmental Quality and Resilience, Rebecca Pow MP, to the letter from the re3 Board, about the intended Deposit Return Scheme (DRS) for some recyclables.

5 BACKGROUND

- 5.1 The Government has announced its intention to introduce a Deposit Return Scheme (DRS). This is formalised within the Environment Act 2021, and will be further developed via secondary legislation and subsequent statutory guidance
- 5.2 In consideration of the information currently available on DRS, and recognising that the decision to introduce the scheme has been made, officers identified some areas of query and potential concern.
- 5.3 These queries were reported to the re3 Board, who wished to raise them, with Government, in the hope that any clarification would help the councils to better understand the impacts of DRS for local residents, and on the councils themselves.
- 5.4 A letter was sent, on behalf of the re3 Board, to Rebecca Pow MP, Minister for Environmental Quality and Resilience. The re3 letter is attached at Appendix 1.
- 5.5 A response has been received from Minister Pow, and it is attached at Appendix 2.

Outcome of Correspondence

- 5.6 The re3 Board raised, in the initial letter, queries about the following:
- The apparent absence of an equalities impact assessment (EqIA) for DRS and concerns about fairness and accessibility for residents who are elderly and/or disabled.
 - Cost of living concerns relating to the application of a 'deposit' on top of the current sale price for items of packaging that fall within the planned scope of

DRS.

- Fair funding queries on behalf of councils.
- Queries about the potential complexity for service users.
- The environmental impacts of DRS, such as relating to litter.

5.7 The response from Minister Pow only superficially engages with the reasonable queries raised by the re3 Board. In general, it does not provide detailed answers or reassurance, this is especially the case in relation to concerns around the accessibility of DRS for residents who are elderly or disabled.

5.8 In the absence of answers via the Ministerial reply, it must be hoped that the queries have contributed to the ongoing process of drafting the legislation and guidance on DRS and that the re3 Board has provided helpful feedback to Government.

6 ADVICE RECEIVED FROM ADMINISTERING AUTHORITY

Head of Legal Services

6.1 None for this report.

Corporate Finance Business Partner

6.2 None for this report.

Equalities Impact Assessment

6.3 None.

Strategic Risk Management Issues

6.4 None

Climate Impact Assessment

6.5 None.

7 CONSULTATION

Principal Groups Consulted

Not applicable.

Method of Consultation

Not applicable.

Representations Received

Not applicable.

Background Papers

JWDB Legislation Update Report – 2nd March 2023

Contacts for further information Oliver Burt, re3 Project Director, 0118 937 3990,
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A waste management partnership between Bracknell Forest,
Reading and Wokingham Borough Councils.



Rebecca Pow MP
Minister for Environment Quality and Resilience
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
London
SW1P 4DF

15 March 2023

Dear Ms. Pow,

Collections and Packaging Reforms (CPR)

I am writing on behalf of the re3 partnership of Bracknell Forest, Reading and Wokingham Borough Councils in Berkshire.

We are concerned by aspects of the Environment Act (2021) which fall under the summary title of Collections and Packaging Reforms (CPR).

We are writing in relation to the decision to introduce a Deposit Return Scheme (DRS) as part of the CPR arrangements. We consider that, amongst the wider CPR package of measures, DRS is likely to be a disruptive and inefficient contributor. Significant gaps and issues exist in the proposal for a DRS, which we identify below. They are as follows:

1. At time of writing, there doesn't appear to be an available Equalities Impact Assessment (EqIA) for DRS. We assume that a specific EqIA was undertaken before the decision to adopt DRS was taken but would request that it is now published without delay. Access and disability *are* recognised by Defra as a factor, and are briefly mentioned, section 4.1, in the impact assessment (dated 24/02/21) for DRS, entitled 'Introducing a Deposit Return Scheme on beverage containers in England, Wales and Northern Ireland'. The aforementioned impact assessment says '*A consumer (or someone else) eliminates the environmental and social cost*

by taking the time to return the container to a return point and are returned the full deposit. Each consumer can make a choice on whether to return the container or not, based on his/her personal valuation of the time taken to do so. We respectfully challenge the rather simplistic assumption that one's own time is the determining factor. At a recent meeting of the Reading Borough Council, Access and Disabilities Working Group, delegates were sceptical of the fairness of a scheme which will levy an increase in product price at the point of sale, but which makes it harder to feed in-scope items into the recycling system (compared with existing, local services). Redemption of the deposit will require extra effort on the part of all residents but is not just a simple choice and is likely to be most difficult for those who are elderly or disabled. The cost of the deposit may represent a tax on residents' ability to return items to a reverse vending location. In the absence of an EqIA, wherein some moderating operational specifics may be recognised, there appears to be potential that, for those with a protected characteristic, DRS might not comply with the expectations of the Equality Act 2010. In the design of DRS, there may also be a failure to abide by section 149 the Equality Act, the Public Sector Equality Duty. This stands in contrast to the services currently offered by local authorities, which can specifically support elderly and disabled residents through 'assisted' collections.

2. The deposit represents a significant increase in costs for consumers. Defra appears to have confirmed that all PET plastic bottles, aluminium and steel drinks containers will be in-scope, both individually and as part of a multipack. At the time of writing, the following percentage increases in costs were calculated, using online prices from Asda:

- 12 x 330ml Diet Coke £5.40 + DRS (if £0.20p) £2.40 (DRS = 33.77%)
- Robinsons Orange Squash £1.85 + DRS (if £0.20) £0.20 (DRS = 9.76%)

If the deposit will only apply to one unit of a multipack, that will rather undermine the principle of compulsion that is required to make DRS a success. If the deposit *is* applied to each unit within a multipack it will result in some considerable increases in sale-price, to be borne by consumers. A parallel outcome is the likely reduction in the sales of multipacks of cans, potentially driving an increase in the use of plastic,

for larger capacity containers – which may undermine the environmental credentials of the scheme. Returning to the principal point: the current affordability crisis for many products and services is something that, we hope and expect, will not continue for a prolonged period. Nonetheless, the above examples of price increases would be unwelcomed and challenging for many consumers, regardless of when they are introduced.

3. We understand that arrangements will be made for local authorities to feed-in to DRS in-scope items of packaging that remain within the existing, kerbside collection of recycling. We would be grateful for clarification of a specific point about the value of in-scope packaging, to local authorities. We understand that a resident depositing an in-scope item will have returned the full £0.20p deposit, but a council returning an in-scope item of packaging will be paid c£0.03p for the same outcome. This seems to be rather unfair to local authorities, who as discussed elsewhere in this letter, will lose income on DRS in-scope material, are likely to have to compensate contractors through contract change and won't be able to reduce collection costs because, through Waste Collection Consistency, they must maintain the capacity to collect materials that are also intended to be captured by DRS. We would urge a rethink of this aspect, so that local authorities are adequately funded for any contribution they make to scheme recycling targets.

4. One of the stated aims of the CPR arrangements is to reduce complexity for service users – seeking to address apparent confusion on the part of residents about what can and can't be recycled via a particular service. There are many aspects of the wider arrangements that will undoubtedly simplify recycling, but DRS is not amongst them. The inclusion of only aluminium and steel *drinks* containers, whilst omitting other aluminium and steel packaging, such as for pet food, is sure to be confusing for residents. This omission suggests a preference, on the part of the architects of DRS, to focus the scheme on the capture of the cleaner, higher value, materials only. It does not support the aim of simplification and clarity.

5. Despite consultation responses indicating an alternative preference by consultees, it has been decided to allow the Deposit Management Organisation (DMO) to

allocate unredeemed deposits towards the costs of the scheme itself. This inexplicable decision is presumably good news for packaging producers but actually represents an unnecessary cost for consumers. DRS makes recycling harder for consumers, and their deposits will be used to reduce the costs of the organisations who placed the packaging on the market. Those aspects are not consistent with 'producer responsibility', they are more akin to 'consumer responsibility' in terms of both the effort to recycle and the cost burden. We would urge that unredeemed deposits are directed at supporting environmental outcomes, through communications, support for low recycling neighbourhoods, translations and measures to support the elderly and disabled.

6. The Impact Assessment for DRS, dated 24/02/21, did not appear to consider the impact on existing long-term contracts from the removal of valuable materials from council collections. Our Contractor has assessed that the impact on the councils from this will be c£600kpa. In our case, and many others too, the removal of up to 90% of PET plastic bottles and drinks cans, will hamper the re3 councils' ability to comply with composition and income targets. Our Contractor is certain to seek relief and/or compensation. This will need to be addressed through contract change, requiring legal and financial support and will very likely increase costs for residents. We would be grateful to understand if the economic case for DRS (and/or CPR) recognises these repercussive, contract costs at all. It seems to be the case, from the information available thus far, that DRS will cause a great deal of extra work for local authorities and their contractors, which will only detract from their respective capacities to deliver 'efficient' and 'effective' services for the public.
7. We are concerned that the quoted reductions in litter costs, from DRS, might need to be revisited. We would be grateful to know if the cost assessments recognise the marginality of any saving, from not having to pick up drinks bottles and cans, when compared with the extant costs of addressing those forms of littering that are not targeted. For example, chewing gum, soft plastics (crisp packets etc.), coffee cups, and vapes are each a significant class of littered items, none of which will be addressed by DRS and which will still require litter-picking. In the case of vapes we understand that the Office for Product Safety and Standards (OPSS) has no plans

to enforce the Government's own policy of requiring retailers to take-back vapes. That hardly helps the general aim of reducing litter and delivering savings to local authorities, to offset the losses in income and other detriments from DRS.

We consider that the introduction of a DRS is a wholly unnecessary, even counter-productive, step towards achieving otherwise laudable aims. In its present form it is likely to cause considerable inconvenience to residents, with the elderly and disabled most affected. It represents a significant and avoidable increased cost on consumers. It will cause considerable and repercussive economic impacts to existing waste management contracts, many sponsored by Defra. The use of unredeemed deposits to pay for the scheme administration is poor PR at best, particularly when that money could have been directed at environmental objectives. And we question whether DRS will make material differences to the cost of litter collection.

We consider that DRS should be paused, in consideration of all of the above factors. This would allow the other elements of the CPR arrangements, Extended Producer Responsibility (EPR) and Waste Collection Consistency, to be introduced. Their combined arrangements will certainly increase the efficiency and effectiveness of recycling in the UK and appear likely to achieve the Government's outcomes without such disruption and duplication.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'DAS Hayes'.

Councillor Mrs Dorothy A S Hayes MBE
Chairman re3 Joint Waste Disposal Board

By email to: chris.preston@defra.gov.uk,

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Department
for Environment
Food & Rural Affairs

Rebecca Pow MP
Minister for Environmental Quality and Resilience

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Councillor Mrs Dorothy A S Hayes MBE
Chairman re3 Joint Waste Disposal Board
Bracknell Forest Borough Council
Easthampstead House, Town Square
Berkshire, RG12 1AQ
oliver.burt@reading.gov.uk

Our ref: PO2023/05396/JM

11 April 2023

Dear Cllr Hayes,

Thank you for your letter of 15 March about the Deposit Return Scheme (DRS) for drink containers.

The UK Government, Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland consulted in 2019 and 2021 on the detail of introducing a DRS in England, Wales, and Northern Ireland. In January 2023 we published the Government response to the 2021 consultation, setting out policy decisions and next steps for introducing the scheme from October 2025.

The DRS has several additional benefits over and above the wider Collection and Packaging reforms. It is designed to increase the collection and recycling of a commonly littered packaging type – drinks containers – and reduce littering. By creating separate waste streams for these materials, they will be captured to a high quality for reprocessing. Rather than risk being downgraded to lower value material, drinks containers will be turned back into new drinks containers.

You have highlighted several key matters in your letter. On the cost to the consumer, we acknowledge that the addition of the monetary deposit will increase the price of drinks for consumers in the first instance. However, we need to be clear that this is a redeemable deposit, and we want to make it as easy as possible for consumers to return containers. As well as return to retailer return points, we have also explored takeback obligations for online/distance sales. We are particularly looking at how large supermarkets delivering grocery shopping provide consumers a takeback service, as well as considering how other businesses could deliver a takeback service where feasible to help support vulnerable customers. With regards to multipacks, our scheme administrator will have powers to set either a fixed or a variable deposit, which they could use to reduce the impact on costs of multipacks. An equalities impact assessment is being undertaken and will continue to be updated in the next phase of work as we develop the detailed legislation to allow us to accurately reflect what is included in legislation.

Unredeemed deposits will remain in the scheme and be reinvested back into it, helping to fund the overall running of the DRS. This is a common form of funding in international DRSs.

We anticipate the scheme will be collecting upwards of 90% of in-scope DRS containers from year three of the scheme's operation. It is likely that many of those containers not returned will continue to travel through local authority waste streams such as kerbside recycling.

We want to encourage local authorities and their waste operators to separate out in-scope drinks containers and return them into the scheme to receive the deposit amount (provided they meet the criteria for return set by the scheme administrator). We anticipate the Deposit Management Organisation working closely with local authorities, to ensure as much material is returned as possible via return points and, to help meet collection targets and keep material within the closed-loop model of the DRS. We envisage local authorities making savings as a result of reduced litter clean up.

The DRS will cover drinks containers (polyethylene terephthalate plastic, steel, and aluminium cans; plus glass in Wales). In scope containers will be labelled and there will be supporting communications so we do not think the messaging will be confusing to consumers.

Thank you once again for taking the time to contact me about this important issue.



REBECCA POW MP

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Arrangements) (Access to Information) (England)
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