

TO: JOINT WASTE DISPOSAL BOARD
29th September 2022

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 task the re3 Project Team with delivering the suggested service aspects, as described at 5.5.**
- 2.4 **That Members determine whether the re3 Joint Waste Disposal Board wishes to retain or remove the booking system.**
- 2.3 **That Members consider the proposal for a mattress recycling trial, as described at 5.36.**

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

Recycling Centre Booking System

- 5.1 The re3 partnership introduced a booking system at the recycling centres during the first Covid lockdown in May 2020. This helped the councils to operate the sites safely and ensure that social distancing could be observed.
- 5.2 Officers presented a report setting out data and options relating to the booking system at the meeting of the Joint Waste Disposal Board in June 2021. Members will recall that the general benefits, relative to pre-booking operations, include:
- Reduced queue times for residents and certainty of prompt access
 - Safe access to the transfer station for council vehicles
 - Safe access to neighbouring premises, for local businesses
 - Allocation of staff time to core operational duties, including helping visitors, over queue management
 - More efficient visits by residents (on average, more waste per trip).
- 5.3 At the re3 Board meeting in September 2021, Members approved the retention of the booking system from November 2021.

- 5.4 At the re3 Board meeting in July 2022, Members received a detailed presentation on the current performance of the system, user satisfaction statistics and suggestions for changes to improve the system. Members indicated a number of areas where further information would be welcomed. These have been added to the presentation at Appendix 1. This includes information on digital exclusion, compliance with the booking system, and some additional analysis relating to fly-tipping; all of which were requested by the Board to inform their decision.
- 5.5 Feedback received since the July meeting has indicated that Councillors would like to see steps taken to address concerns about digital exclusion, translation of key information into a wider range of languages (relevant to the re3 area) and a wider advertisement of the system to both communicate its advantages, and to ensure non-users are aware of it. Finally, it is proposed that questions (common to each council) are included within the next corporate customer satisfaction survey by each council. This suggestion is specifically directed at seeking the views of both users and non-users, so the system can reflect both groups of residents.
- 5.6 Following this, Members are invited decide whether the booking system should be retained.

re3 and Council Performance Statistics

- 5.7 The provisional recycling rates for April – August 2022 are presented below alongside a comparison with the same five months of 2021.

April-August	2021/22	2022/23	Decrease
BFC	58.8%	56.2%	2.6%
RBC	52.1%	50.7%	1.4%
WBC	56.6%	54.7%	1.9%

- 5.8 Members will observe a decrease in the recycling rates of all three councils.
- 5.9 In Bracknell, residual waste tonnages have only fallen by 1% whilst recyclables tonnages have fallen by 11%. The biggest overall reduction has been in kerbside green waste, but food waste, mixed dry recycling and bring bank tonnes have also seen reductions.
- 5.10 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.
- 5.11 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 and bring bank tonnes have also seen reductions.
- 5.12 A full breakdown of the tonnages is shown in Appendix 2, alongside some further narrative.
- 5.13 Officers will continue to monitor and report the recycling rates and any national trends.

Recycling Centre Bag Splitting

- 5.14 In April 2016, Members endorsed a proposal for bags of waste, received at the recycling centre, to be opened by HWRC staff. This was to allow recyclable materials

to be sorted and diverted away from the residual waste stream.

- 5.15 The initiative was implemented successfully for a number of years. However it was necessary to suspend it in 2020, to help prevent the spread of Covid-19. Following discussions with the re3 Contractor, Officers now propose that this activity recommence.
- 5.16 Officers requested that a trial be undertaken to establish the level of recyclables currently present in the bagged waste received at the recycling centres. Samples were taken over the course of a week and the results are presented in Appendix 3. Members will observe that paper, card and plastics made up a high percentage of the recyclables found. A large quantity of textiles were also present.
- 5.17 The weight of bagged waste as a proportion of the total HWRC residual waste is not accurately known. However the re3 Contractor estimates that this could be in the region of 15%. If we assume that half of this could be extracted for recycling, it is estimated that this activity could add between 0.2% and 0.4% to each Council's recycling rate.
- 5.18 The recommencement of the bag splitting initiative will be a good chance to review the process and ensure that the activity acts as a means of education, as well as extracting recyclables.
- 5.19 Residents will be able to stay and observe the bag splitting process. The data collected about the types of recyclables identified will also be used to inform communication messages which can be used to encourage residents to self-segregate their waste.
- 5.20 Members should note that the re3 Contractor is planning to undertake some bioaerosol testing at the recycling centres, to determine the levels present and the Personal Protective Equipment (PPE) required. Bioaerosols (including airborne fungi and bacteria) can be generated during the separation of municipal waste and result in respiratory health issues for staff, when not properly controlled. Officers will therefore keep the initiative under review.
- 5.21 HSE guidance states that HWRC operators should provide the same standard of PPE for anyone sorting black bag waste. Separate HSE and WISH guidance currently requires staff to use face-fitted masks due to the presence of bioaerosols. As these cannot be provided to the public, options for residents to sort their own waste at the sites, have not been put forward at this time. Residents will be invited to observe the process from a distance.

Persistent Organic Pollutants

- 5.22 Persistent Organic Pollutants (POPs) can have harmful impacts for the environment and human health, by accumulating in the fatty tissues of humans and animals.
- 5.23 The impact of POPs was recognised in the 2004 Stockholm Convention, a global treaty which recognised the impact on human health and the environment. To prevent this impact, the Persistent Organic Pollutant Regulations 2007, require that waste containing POPS must be destroyed through incineration.
- 5.24 An investigation by the Environment Agency (EA) has found large quantities of POPs in upholstered domestic seating. These come from chemicals used as flame retardants in seat covers and foams. As a result, the EA has written to waste authorities advising that any item of upholstered domestic seating waste (including those such as sofas, foot stools, dining room chairs, armchairs and bean bags) must be managed as POPS

waste, unless it can be demonstrated that the items do not contain these.

- 5.25 Other waste can also become contaminated with POPs when an upholstered item is damaged. For example, when some of the upholstery (e.g. foam or lining) is released, or the underside of the cover is contact with other items. The EA therefore requires that waste authorities take all reasonable steps to keep items containing POPS separate from other wastes during collection, storage and treatment. The requirement will consequently include the need for separate collection points at the recycling centre and segregated collection of fly-tips or bulky waste.
- 5.26 As members may be aware, bulky waste items cannot be accepted at most EfW facilities. As a result, upholstered furniture and other contaminated items will first need to be shredded. This must take place in an appropriate building where dust and other particles can be prevented from escaping.
- 5.27 In cases where waste containing POPs is mixed with waste not containing POPs, all of the waste must usually be managed as POPs, unless the undamaged items can be extracted. In order to minimise the quantities of waste that need to be treated via this process (at expected additional cost), it is therefore especially important that any mixing of POPs and non-POPs waste is prevented.
- 5.28 The EA has asked waste authorities and their contractors to confirm that their waste management practices for this material are compliant before the end of this calendar year. An assessment of compliance will then take place in January 2023.
- 5.29 The re3 Partners are in the process of working together to put together a response for the EA.
- 5.30 Alongside this, the waste industry is currently lobbying the EA to extend the timescale for implementation as there are presently very few facilities with the capacity to accept this waste for processing. There could also be significant implications for the collection and storage of waste; including at re3. In addition, there is currently some uncertainty about the date from which the landfilling of these items will be banned.
- 5.31 Officers will seek to provide an update on the situation at a subsequent meeting.

Mattress Recycling

- 5.32 The re3 Partnership is always seeking ways in which to divert items from landfill, and a recycling option has been identified for the mattresses delivered to the recycling centres.
- 5.33 The mattresses would go to a facility in London, where they would be deconstructed by hand, and separated into their component parts such as steel and cotton. When deconstructed by this process, 79% of the mattress can be recycled.
- 5.34 This would be at a cost of approximately £6 per mattress; for collection, transport and processing. It is estimated that there are approximately 45 mattresses to a tonne, so this would equate to around £240-£270.
- 5.35 The last compositional analysis of residual waste at the recycling centre took place in 2019. This indicated that mattresses made up approximately 3.4% of residual waste at Smallmead and 2.2% of residual waste at Longshot Lane. Based on tonnage data from 2021/22, the recycling of these items could therefore add around 0.1-0.2% to each council's recycling rate.

- 5.36 This option to recycle re3 mattresses would be more expensive than sending them to landfill, which currently stands at £154.80 per tonne. In addition, it should be noted that the conditions applied to upholstered furniture (as described from 5.18), in relation to Persistent Organic Pollutants, could later be extended to mattresses and other materials.
- 5.37 In the event that Members are interested in exploring this option further, Officers propose that a trial be undertaken at the recycling centres. This would provide better information about the number of mattresses received, and the time required to obtain the minimum (50) required for a collection. It would also enable the service of the recycler to be established and a full duty of care audit to be conducted via a site visit.
- 5.38 The mattress reprocessor has been using a shredder to deconstruct the mattresses during the Covid-19 pandemic, and only 45% of the mattress can be recycled via this route. The remainder is used as fuel in a cement kiln. As a result it is proposed that any trial commences when the manual process has resumed. This is anticipated to be within the next few months.

Sue Ryder Project

- 5.39 The re3 Partnership has been working with the Sue Ryder charity since 2011. The charity provides palliative and neurological care, as well as bereavement support.
- 5.40 The charity currently collects reusable bric-a-brac and furniture from the recycling centres to sell in local shops. In addition, the charity collects bicycles which have been deposited at the sites. These are taken to HMP The Mount, in Hertfordshire, where they are cleaned, repaired and serviced, before being taken for sale at Sue Ryder shops, including those in Sandhurst and Reading. Between April and July 2022, 447 bikes were collected for repair at the prison.
- 5.41 The partnership with Sue Ryder has social, environmental and financial benefits and Officers approached the charity to discuss potential options for more of our bulky items.
- 5.42 As a result, Sue Ryder have requested more solid wooden items such as tables and cupboards. These would be taken to HMP The Mount, to be cleaned, shaved and sanded, and made into new items, such as chopping boards. Small offcuts of wood would be bagged up and sold as kindling.
- 5.43 As well as generating an income for the charity, this should help benefit the residents of the prison, through providing skills and qualifications that may be used upon their release.
- 5.44 Officers will draft up a Service Level Agreement and it is anticipated that the collections may start in within the next few weeks.
- 5.45 The wooden items used for the project will initially be sourced from the council's bulky waste collections, after the waste has been deposited in the transfer stations.

Contractor Appraisal

- 5.46 Since the time the re3 PFI contract was negotiated, the operating environment for local government has changed significantly. To supplement the contractual management of performance, and to reflect contemporary expectations and requirements, the re3 Partnership developed a Contractor Support Appraisal.
- 5.47 Through the process, the Contractor's Performance has been scored under a number

of different categories. Feedback for 2021/22 was sought from colleagues at each of the three councils for inclusion and any scores of 6 or above represent adequate support.

- 5.48 The full appraisal is provided at Appendix 4.
- 5.49 Members will observe that the Contractor has again been supportive of the re3 Partnership in terms of strategic development in the 2021/22 year. They have also provided support for communication activities and operated the sites safely during the course of the Covid-19 pandemic.
- 5.50 Of the 21 areas covered by the Contractor Support Appraisal, only 1 scored a 5 or below. The re3 Contractor is required to self-monitor performance in relation to the Performance Mechanism. This is an area in which Council Officers need to provide enhanced input in order to deliver expected outcomes.

Communications

- 5.51 After the Community re3Grow Scheme was launched in May, various community groups in the re3 area were awarded free bags of re3grow compost. The scheme was initially scheduled to end in July, but the scheme has now been extended until the end of October due to the quantity of compost leftover. The scheme has also now been opened to local schools in the re3 area.
- 5.52 Re3 have now received feedback from the local community groups who were awarded free compost in May, June & July. The re3Grow compost has been used for a range of exciting purposes, such as growing food for ReadiFood Food Banks, sprucing up local community gardens and helping volunteers learn new gardening skills. A newsletter has been drafted highlighting some of the feedback & a news article has been drafted for the re3 website.
- 5.53 Re3 have planned a series of communications for Recycling Week 2022. The theme of this year's recycling week is 'Lets Get Real About Recycling' and focuses on dispelling myths about recycling. Recycling Week was originally scheduled for the 19th – 25th September but has now been postponed due to the bank holiday, for the funeral of Queen Elizabeth II. The communications are ready to be sent once the week is rescheduled.
- 5.54 The correct postcode data has now been sent to the re3yclopedia app developers, as previously some postcodes in the re3 wouldn't yield any results when entered into the app. This should hopefully solve the issue.

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

December 2021 re3 Board

Contacts for further information

Sarah Innes, re3 Monitoring and Performance Officer
0118 937 3459
sarah.innes@reading.gov.uk

Oliver Burt, re3 Project Director
0118 937 3990
oliver.burt@reading.gov.uk

APPENDIX TWO – WASTE TONNAGE BREAKDOWN

Bracknell Tonnages

Source		2021/22	2022/23	Tonnage Change	Percentage Change	Notes
Residual Waste	Kerbside Residual	6782.82	6565.48	-217.34	-3%	
	HWRC Residual	905.47	1042.37	136.90	15%	
	Other Residual	391.35	318.89	-72.46	-19%	Mainly change in street sweeping reporting
	MDR Rejections	673.41	728.02	54.61	8%	
	HWRC Non-Recycled	97.47	99.08	1.61	2%	
Recyclable Waste	Kerbside MDR	2546.47	2174.20	-372.27	-15%	
	Other Council Collected	222.72	339.81	117.09	53%	Mainly change in street sweepings
	Bring Banks	1645.26	1312.85	-332.42	-20%	Mainly reduced glass
	HWRC Card	182.63	186.36	3.72	2%	
	HWRC Scrap metal	257.77	271.97	14.19	6%	
	HWRC Wood	795.21	834.87	39.65	5%	
	HWRC WEEE	250.43	254.63	4.20	2%	
	HWRC Other	199.36	224.62	25.26	11%	Mainly increased due to the introduction of rigid plastics
Composting	Kerbside Food	2567.36	2251.78	-315.58	-12%	
	Kerbside Garden	3138.12	2445.00	-693.12	-22%	
	HWRC Garden	720.67	708.19	-12.48	-2%	
	Other	91.84	207.08	115.24	56%	Mainly change in street sweepings

Summary

		2021/22	2022/23	Tonnage Change	Percentage Change
Total		21468.38	19965.19	-1503.19	-7%
By Waste	Residual	8850.52	8753.84	-96.68	-1%
	Recyclable and Compostable	12617.86	11211.35	-1406.51	-11%
By Source	HWRC Total	3409.03	3622.09	213.06	6%
	Kerbside Total	15708.18	14164.48	-1543.70	-10%
	Bring Banks	1645.26	1312.85	-332.42	-20%
	Other	705.91	865.78	159.87	23%

Classification: UNCLASSIFIED

Reading Tonnages

Source		2021/22	2022/23	Tonnage Change	Percentage Change	Notes
Residual Waste	Kerbside Residual	9123.22	8997.68	-125.54	-1%	
	HWRC Residual	981.58	853.33	-128.25	-13%	
	Other Residual	688.84	476.74	-212.10	-31%	Mainly a reduction in litter and street sweepings
	MDR Rejections	835.89	966.25	130.36	13%	
	HWRC Non-Recycled	72.97	92.21	19.24	21%	Mainly increased due to tyre load out
Recyclable Waste	Kerbside MDR	3156.71	2885.09	-271.62	-9%	
	Other Council Collected	264.86	91.76	-173.10	-65%	Mainly a reduction street sweepings
	Bring Banks	1438.48	1204.15	-234.33	-16%	Mainly reduced glass - but textiles too.
	HWRC Card	175.61	178.61	3.00	2%	
	HWRC Scrap metal	284.82	283.73	-1.09	0%	
	HWRC Wood	878.84	974.53	95.69	10%	
	HWRC WEEE	258.04	264.07	6.03	2%	
	HWRC Other	241.22	255.89	14.67	6%	Mainly increased due to the introduction of rigid plastics.
Composting	Kerbside Food	3197.98	2699.21	-498.78	-16%	
	Kerbside Garden	1869.06	2019.15	150.09	8%	
	HWRC Garden	869.32	682.62	-186.70	-21%	
	Other	82.02	156.51	74.49	48%	Mainly an increase in schools' food waste

Summary

		2021/22	2022/23	Tonnage Change	Percentage Change
Total		24419.46	23081.53	-1337.93	-5%
By Waste	Residual	11702.51	11386.22	-316.29	-3%
	Recyclable and Compostable	12716.95	11695.31	-1021.64	-8%
By Source	HWRC Total	3762.40	3585.00	-177.40	-5%
	Kerbside Total	18182.86	17567.37	-615.49	-3%
	Bring Banks	1438.48	1204.15	-234.33	-16%
	Other	1035.72	725.01	-310.71	-30%

Classification: UNCLASSIFIED

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Wokingham Tonnages

Waste	Source	2021/22	2022/23	Tonnage Change	Percentage Change	Notes
Residual Waste	Kerbside Residual	10799.54	9945.92	-853.62	-8%	
	HWRC Residual	1618.69	1372.61	-246.08	-15%	
	Other Residual	684.48	545.22	-139.26	-20%	Mainly a reduction in litter and street sweepings
	MDR Rejections	850.24	954.95	104.70	11%	
	HWRC Non-Recycled	147.99	143.64	-4.35	-3%	
Recyclable Waste	Kerbside MDR	3244.42	2852.15	-392.26	-12%	
	Other Council Collected	402.30	281.57	-120.73	-30%	A reduction in street sweepings
	Bring Banks	1777.35	1632.99	-144.36	-8%	Mainly reduced glass - but textiles too.
	HWRC Card	306.38	265.32	-41.05	-13%	
	HWRC Scrap metal	465.65	404.85	-60.80	-13%	
	HWRC Wood	1434.19	1316.94	-117.24	-9%	
	HWRC WEEE	446.67	383.29	-63.38	-17%	Mainly a reduction in large WEEE
	HWRC Other	381.66	352.67	-28.99	-8%	Down across a range of items
Composting	Kerbside Food	2644.85	2591.06	-53.79	-2%	
	Kerbside Garden	5797.20	4469.26	-1327.94	-23%	
	HWRC Garden	1367.49	1011.24	-356.26	-26%	
	Other	99.74	69.08	-30.67	-44%	A reduction in street sweepings

Summary

		2021/22	2022/23	Tonnage Change	Percentage Change
Total		32468.83	28592.76	-3876.07	-12%
By Waste	Residual	14100.94	12962.33	-1138.60	-8%
	Recyclable and Compostable	18367.89	15630.42	-2737.47	-15%
By Source	HWRC Total	6168.71	5250.56	-918.15	-15%
	Kerbside Total	23336.25	20813.34	-2522.91	-11%
	Bring Banks	1777.35	1632.99	-144.36	-8%
	Other	1186.52	895.86	-290.65	-24%

Classification: UNCLASSIFIED

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 contamination levels seen overall.
6	Garden waste tonnages have fallen, and this could be linked to the recent dry weather. Although the kerbside tonnages in Reading appear to have increased, 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	Overall, the tonnages of waste received at the recycling centres are lower than seen in the same period last year. The tables show an increase in many recyclables at Bracknell and Reading, but not at Wokingham. This relates to changes in tonnage allocation, linked to patronage data.
9	The tables show an increase in HWRC residual waste at Bracknell, but not in the other two councils. Compared to the same period last year, the Longshot Lane recycling centre has seen a slight drop in recycling rate (71.8% to 69.7%), whilst the Smallmead recycling centre has seen a slight increase (72.6% to 74.1%). However these rates can be affected by the timings at which the waste is weighed out of site.

APPENDIX FOUR – CONTRACTOR SUPPORT APPRAISAL (2021/22)

	Category	Criteria	Detail	Rating (out of 10)
1	Contract Delivery	Knowledge of Contract	Has a practical, client conscious and accurate understanding of the contract been demonstrated in each circumstance where such understanding was required?	6
		Adherence to Contract	Default compliance with the terms of the contract is important. Where contractual interpretation is perceived to be necessary has it been undertaken with full involvement of the client team and at the earliest opportunity?	7
		Monitoring and Reporting	Has the Contractor accurately monitored and reported performance throughout the Contract Year?	4
		KPI's	Is performance against KPIs managed appropriately? Are performance deductions and default points accepted where evidenced?	6
		Contract Administration	Has the Contractor provided all contract documents required to be provided in the relevant Contract Year, complete according to specification or agreement, on time?	6
		Maintenance	Are the facilities and assets maintained according to relevant specifications and/or contractual requirements? Are accurate records held and available to the client?	6
		Operations	Are operational (working) visitors treated respectfully? Does the Contractor exemplify on-site behaviours which support high standards, safe working and the performance outcomes in keeping with our collective expectations of this Contract?	8
2	Financial Delivery	Accurate Reporting	Have invoices and reconciliations been submitted with a high degree of accuracy? Were errors obvious or avoidable? Have actual outputs been consistent with forecasts?	8
		Timely Reporting	Were invoices and reconciliations submitted on time? Were queries and information requests from the client given prompt attention?	8
		Transparency	Has supporting information been freely available to the client? Can operational decisions be supported with evidence of Best Value in accordance with the Contract?	8
		Delivering Value	Does the Contractor provide financial support and expertise as needed? Does the Contractor use their industry knowledge and resource to minimise costs and maximise returns to the client?	6
3	Strategic Support	Support for re3 Strategy	Has the Contractor actively and purposefully supported the aims of the re3 Strategy?	9

		Collaboration	Has the Contractor supported and/or facilitated initiatives which are of importance to the re3 Partnership?	8
		Brand and Image	Does the Contractor adhere to the re3 and individual Council branding guidelines, like the correct usage of logos? Are staff aware of how they may be perceived by their words and actions when dealing with residents and other contractors, and when they are effectively representing the partnership Councils? Are staff aware that they can help in protecting the re3 brand and image by reporting any feedback they may have come across on social media?	7
		Marketing and Communications	Is the Contractor supportive of re3 marketing and communication campaigns? Does the Contractor update the website promptly and according to requirements? Are all media opportunities, visit or media requests to the Contractor shared with re3?	8
4	Customer Care	Residents (on site)	Does the Contractor interact with residents constructively about re3 facilities? Do staff at the re3 facilities exemplify the expectations of the re3 Partnership for residents to experience high quality services?	6
		Residents (in writing)	When replying to correspondence (as required and including emails), does the Contractor communicate in a manner which is constructive, open and appropriate?	7
		Residents (phone)	Does the Contractor manage phone communications appropriately so that residents are informed, supported and able to proceed correctly following a single call?	7
5	Industry Leadership	Service Development	Has the Contractor delivered continuous service development and improvement throughout the relevant year?	8
		Business Analysis	The Contract is a Partnership. Has the Contractor shared its analysis of the business environment in order that the re3 Partnership can support mutually beneficial performance improvements, commercial initiatives and safe working practices?	9
		Innovation	Has the Contractor incorporated innovations from within its own, wider corporate structure, or the waste industry in general, which facilitate the delivery of savings to the re3 Partnership, add value or improve efficiency?	9