

Agenda Item No:

NORTH LONDON WASTE AUTHORITY

REPORT TITLE:

'RECYCLE ON THE GO' CONSULTATION

REPORT OF:

HEAD OF WASTE STRATEGY AND CONTRACTS

FOR SUBMISSION TO:

AUTHORITY MEETING

DATE:

19th September 2007

SUMMARY OF REPORT:

This report provides members with an overview of a DEFRA consultation on public place recycling and a draft Authority response for member approval. The report summarises the background and rationale to the proposals, a proposed voluntary code of practice and proposed good practice guide. The draft response does not address all 58 questions in the consultation document, but focuses on those of most relevance to the Authority.

RECOMMENDATIONS

The Authority is recommended to approve the draft response attached as Appendix 1.

**Signed by Head of Waste Strategy
and Contracts**

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Date:

1.0 BACKGROUND TO THE 'RECYCLE ON THE GO' CONSULTATION AND STRUCTURE OF THE REPORT

- 1.1 The consultation document entitled 'Recycle on the Go' was issued on 13th August with a deadline response date of Friday 2nd November 2007. The consultation seeks views on a proposed voluntary code of practice and good practice guide on providing recycling bins in public places. The consultation and proposed code of practice and good practice guide deliver on a Waste Strategy for England 2007 commitment to see recycling extended from the home and office into public areas like shopping centres, train stations and cinema multiplexes, so that recycling becomes a natural part of everyday life for people in England. This consultation is one of a number anticipated to be issued over forthcoming months in the wake of the publication of Waste Strategy for England 2007.
- 1.2 It is proposed in the consultation document that the voluntary code of practice and good practice guide are launched simultaneously by the end of this year with the expectation that organisations can sign up to the voluntary code and follow the guidance from that point on. The government hopes that this will help to spark a new wave of public place recycling by 2008 and set a context in which everyone can take responsibility for recycling litter. Litter recycling is seen as a further step towards the 'one planet living' concept which is outlined in Waste Strategy for England 2007. It is also hoped that if more recycling bins are available for use when people are out and about, then this will promote and reinforce positive behaviour and 'normalise' recycling as an everyday activity in which all can take part.
- 1.3 Sections 2 to 5 of this report set out the Government's rationale and evidence base, and summarise the proposed code of practice and good practice guide. The implications for the Authority are at Section 6.

2.0 RATIONALE FOR THE PROPOSALS

- 2.1 The Waste Strategy for England 2007 articulates the goal of 'one planet living' and if litter is increasingly recycled, the consultation document says then this goal becomes a step closer. The consultation document notes that whilst litter is a relatively small component of the total amount of waste produced in England, there is little evidence to suggest that the recyclable elements in litter are being routinely recycled on a wide scale, so increased provision of bins to allow people to recycle, should increase recycling figures overall.
- 2.2 The second reason for the government intervention in this area, according to the consultation document is that there does not appear to be an 'inherent market failure' presenting a permanent barrier to organisations providing recycling opportunities for public use. However, the consultees who were approached in the preparation of the document have suggested that if the government provided some guidance in this area, then more organisations would be likely to put facilities in place.

- 2.3 The government is not, according to the consultation paper, proposing to introduce legislation to force more public place recycling, however, the document goes on to say that, should the government consider legislation was required in order to ensure that more facilities were provided, then a separate impact assessment and consultation exercise would need to be undertaken.

3.0 THE EVIDENCE BASE

- 3.1 The 'Recycle on the Go' consultation document provides a section of 'evidence' for providing and encouraging more public place recycling. From a survey of local authorities carried out by DEFRA and ENCAMS (Environmental Campaigns - formerly Tidy Britain Group), prior to the consultation being issued, 27% of those local authorities answering the survey were carrying out public place recycling of some form already (excluding bring facilities and kerbside recycling collections). Of those who answered the survey and who were not providing public place recycling, the deterrents to introduction were cited as:

- Issues with separating materials
- Lack of access to a materials recycling facility
- Perceived additional cost

- 3.2 A series of discussion group seminars was hosted by DEFRA involving various interested parties in April 2007. These seminars concluded that whilst the first priority is to get household and business recycling rates up, there is still an appetite for public place recycling because:

- Litter accounts for approximately 3% of municipal waste and therefore accounts for 3% of the cost (the disposal costs for which are rising).
- Public place recycling reinforces the message about recycling (already provided at home and at work), and avoids any inconsistency between the messages about recycling in different aspects of life.
- Additional bin provision by offering public place recycling can potentially improve the public realm by helping to prevent litter being dropped.
- There is a presentational benefit of 'being seen' to recycle, offering recycling services to residents and visitors and linking existing good recycling practice 'back of house' with 'front of house' facilities e.g. at a train station or cinema complex.

- 3.3 It was also noted in the discussion group seminars that the informational costs of research and setting up a scheme are often quite large and act as a barrier to take-up of schemes.

- 3.4 An options appraisal was carried out as part of the justification for proposing a voluntary code of practice and good practice guide to 'recycling on the go'. A 'do nothing' option would rely on the increasing cost of landfill disposal to drive the voluntary provision of public place recycling facilities. The consultation document concludes that this would do little to spark the new initiative of public place recycling that the government would like to see as part of the ambition of the Waste Strategy for England 2007.

- 3.5 The preferred option, which the consultation document says is justifiable through the net economic benefits that it delivers and the contribution to changing the culture of recycling that it brings, is a voluntary code of practice accompanied by a good practice guide aimed at land, venue, attraction and managers of public places who currently have responsibility for litter and/or would like to offer recycling facilities in public places.
- 3.6 **The Voluntary Code of Practice** - is intended to set out the main principles that organisations can choose to sign up to when setting up and running public place recycling provision.
- 3.7 **The Good Practice Guide** offers more comprehensive advice on setting up and maintaining schemes in the context of the principles of the Code.
- 3.8 The monetary costs and benefits of the preferred option above have been analysed and are outlined in the consultation document. Non-monetary costs and benefits are also discussed. The benefits are also divided into those which accrue to the operator or agent who is running the public place recycling scheme, and these are referred to as 'private' benefits and then into benefits which accrue to society at large which are referred to as 'social' benefits. Using data from a number of sources the consultation document outlines the following composition (shown in table 1), as being typical of an average public litter bin.

Table 1 - Typical composition of an average public litter bin per annum

	Tonnes per annum	% of total
Recyclable cans	0.25	3%
Recyclable paper	1.47	18%
Recyclable glass	0.40	5%
Other material	6.11	74%
Total bin	8.23	100%

Source: 'Recycle on the Go', DEFRA, 13th August 2007

- 3.9 The government estimates, and outlines in the consultation document, that the net national benefit of the proposed voluntary scheme will be between £11 and £32 million based upon an assumption that 60 organisations/local authorities with an average of 1,000 litter bins each, put in place an associated public place recycling scheme and an assumption that there is between 10% to 30% coverage within each local authority area.
- 3.10 The cost benefit analysis assumes that there is no administrative burden placed upon organisations installing public place recycling. This assumption is made on the basis there are currently no statutory or other reporting requirements associated with such a service.
- 3.11 The impact assessment for the proposed approach also brings non-monetary costs and benefit which are outlined in the consultation document as follows:

Benefits

- Increases the quality of recycling as the general public become more informed about recycling. Might also have a virtuous circle effect as people do more recycling at home and in the workplace too.
- Reduced start-up and search costs for business due to the guidance.
- The scheme is voluntary and so does not impose unnecessary burdens on business.
- The scheme is also flexible, and does not prescribe how recycling efforts should be conducted. This will allow schemes to be proportionate and practical, and responsive to diverse local issues and circumstances.
- Fits well with the sustainability agenda, i.e. more recycling, less landfill, more efficient use of resources.
- Ease of having additional recycling facilities available to the public.

Costs

- Costs of drawing up guidance and code, putting on website, and general administration of it.
- Health and safety issues might arise from having glass collected in public litter bins.
- There might also be fire risks from collecting lots of paper in public places.
- Aesthetics of town centres might be reduced by having lots of recycling facilities on the street.

4.0 PROPOSED VOLUNTARY CODE OF PRACTICE

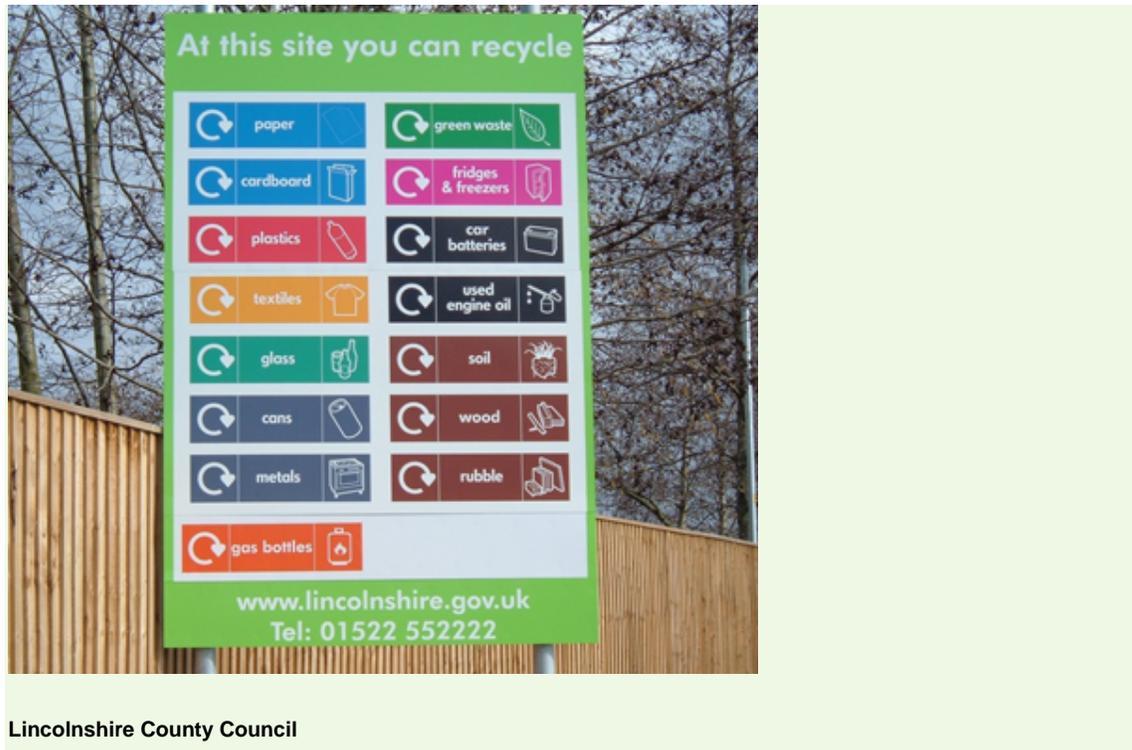
4.1 The consultation document sets out four principles which are proposed should be contained in the code of practice for public place recycling. Any organisation which signs up to the voluntary code of practice would be expected to follow these principles, which are:

- (1) The provision of containers for recyclable waste alongside those for non-recyclable waste.
- (2) Clear promotion of these containers, including the adoption of common signage (i.e. logos and colours) across England for recycling receptacles. (Principally this means adopting the national campaign 'Recycle Now' iconography and materials colouring system). The government states that it would like to see adoption of this signage on all new public place recycling bins and across existing bin stock within 18 months from the implementation of the final code of practice.
- (3) The implementation of an effective management programme, including appropriate maintenance of the infrastructure (i.e. the bins and signage).
- (4) Re-using recycling and composting the materials collected.



National 'recycle' iconography

- 4.2 Examples of the typical 'materials stream colours and graphics which should be used are shown in the following photograph, which is taken from a series of examples shown on the WRAP 'Recycle Now partners' website, demonstrating the use of the Recycle Now brand in action (at re-use and recycling centres).



In Lincolnshire, the Recycle Now visual identity illustrations have been used at the Great Northern Terrace Household Waste Recycling Centre.

5.0 PROPOSED GOOD PRACTICE GUIDE

- 5.1 The consultation document also sets out a proposed good practice guide aimed at organisations and managers that are seeking to establish public place recycling schemes alongside litter collection provision.
- 5.2 The proposed guide recognises that different projects will be at different stages in the development of public place recycling, but assumes the reader is starting from scratch. For the most part the guide is also non-prescriptive, so that organisations can establish a scheme that is fit for purpose regarding local circumstances. The one exception to this is that the Guide recommends that organisations make use of the iconography, that is the logos and colours designed by Recycle Now and WRAP for use on recycling bins. The draft guide covers: what materials to collect; type, location and configuration of bins and promotion of the scheme including positioning signage and public campaigning, to announce the new service. A section which includes a number of case studies of public place recycling covers, recycling provision on a beach, at a major visitor attraction, in an inner city location, in a rural area, at a shopping centre and in an airport.

6.0 IMPLICATIONS FOR THE AUTHORITY

- 6.1 The main implications for the Authority of this consultation document, if its recommendations are implemented are a resultant increase in public place recycling carried out by the constituent boroughs and a potential increase in the amount of recyclables collected and presented to the Authority, particularly, cans, paper and glass.
- 6.2 Using the assumptions contained in the consultation document and therefore assuming that each borough currently has an average of 1,000 litter bins in place, collecting an unsorted and unsegregated 212-636 tonnes per annum of recyclable cans, paper and glass per borough; if recyclables containers were introduced to 10 - 30% coverage in each borough, this would potentially generate an additional 1,484 to 4,452 tonnes of additional recyclable material each year, with an accompanying reduction in mixed litter for disposal.
- 6.3 Table 2 below shows the above calculations in detail, based upon the figures contained within the consultation document.

Table 2 - Potential Impact of Introducing Recycling Bins in Public Places in North London

Unit	Estimated Number	Est. Total Quantity for North London
Litter bins	1,000 per borough	7,000
Est. coverage of recycling bins if installed	10 - 30% per borough (100 - 300 bins/borough)	700 - 2,100 bins
Cans	0.25 tonnes/bin/annum	175 – 525 tonnes
Paper	1.47 tonnes/bin/annum	1,029 – 3,087 tonnes
Glass	0.40 tonnes/bin/annum	280 – 840 tonnes
	2.12 tonnes recyclables/bin site/annum	
Estimated quantity of recyclables if recycling bins installed	212 tonnes - 636 tonnes recyclables per borough (100 - 300 bins/borough)	1,484 - 4,452 tonnes recyclables

- 6.4 The consultation document and proposed good practice guide and voluntary code of practice do not extend to recycling at events, but if boroughs are extending permanent public place recycling facilities it could reasonably be expected that recycling in public might extend beyond additional recycling bins at litter bin points to increased recycling at events, although the logistics of servicing are very different for short term, compared to permanent facilities.
- 6.5 The consultation document notes that the estimates of additional recyclables tonnages collected through increased public place recycling are

underestimated, but the ultimate uptake of these recommendations will be dependent on how far organisations are convinced by the environmental (including percentage contribution towards targets), presentational and cost arguments presented in the consultation document, for introducing such schemes.

- 6.6 The consultation document presents some good evidence to support the case for introducing public place recycling and the case studies accompanying it, also provide practical credence to the introduction of such schemes. It is also hoped, as outlined in the consultation document that if more recycling facilities are available in public places that this will raise the profile of recycling and will enable and encourage people to recycle more both at home as well as when they are out and about.

7.0 RECOMMENDATION

- 7.1 The Authority is recommended to approve the draft response to the consultation attached as Appendix 1.

8.0 COMMENTS OF THE FINANCIAL ADVISER

- 8.1 The Financial Adviser has been consulted in the preparation of this report and has no comments to add.

9.0 COMMENTS OF THE LEGAL ADVISER

- 9.1 The Legal Adviser has been consulted in the preparation of this report and her comments are incorporated within the document.

Local Government Act 1972 – Access to information

Documents used: Consultation on 'Recycle on the Go', 13th August 2007, DEFRA

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Appendix 1 DRAFT North London Waste Authority Response to the DEFRA
Consultation on, 'Recycle on the Go'



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Chairman**

c/o London Assembly
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19th September 2007

'Recycle on the Go' Consultation

Thank you for providing us with the opportunity to respond to the consultation on the above.

The North London Waste Authority is one of the four statutory joint waste disposal authorities in London and as such is not directly responsible for providing public place litter bins or recycling facilities, although the seven constituent boroughs which make up the North London Waste Authority (NLWA) area do provide such services and any increase in recycling as a result of the introduction of new and expansion of existing recycling services in public places in our constituent boroughs, will have an impact on the recyclable material and waste for disposal which is sent to the Authority. Because of the different perspectives on this issue, you may also receive responses from both tiers of local government in our area, i.e. additional responses from the London boroughs of: Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

The North London Waste Authority is not responding to all the questions in the consultation document as they are not all directly relevant to the Authority and accordingly the Authority is not using the 'standard' response form for providing feedback. However, the Authority's response is organised in the same manner as the consultation response form and where possible the Authority is responding to questions within its remit and/or experience.

The Authority's contact details are provided above, with the Authority website at www.nlwa.gov.uk.

Responses to Consultation Questions

Questions in 'Part 3 - Rationale' of the Recycle on the Go Consultation Paper

Question 1: Do you think that organisations should put in place recycle bins in public places? Why?

Yes

Because public place recycling bins help to promote and reinforce good practice (recycling) behaviour in the home and at work, recycling 'on the go' adds additional recycling tonnage and helps to reduce residual waste for disposal in line with the waste hierarchy and because the provision of public place recycling ensures consistency of service across different aspects of life, bridging the home/work divide.

Question 2: Do you agree that Government should offer guidance to organisations on setting up public place recycle bins?

Yes

However, it should be recognised that this is just guidance which will only be heeded if organisations are aware of its existence, so it will need to be promoted, once finalised. Secondly, there is other research on station recycling that could be referenced in the guidance document for others to refer to as follows:

Terminal Recycling - Phase 1
Terminal Recycling - Phase 2
Terminal Recycling - Rail

The above reports are all available at
<http://www.resourcefutures.co.uk/research/publications.htm>

The key recommendations included:

- The need for staff assistance and participation in recycling initiatives
- The importance of the education of staff in recycling initiatives.
- The need for contractual arrangements to include participation in recycling schemes
- The importance of cross-sector working
- The need for transparent charges for waste collection and disposal at railway stations and terminals
- The need to examine current practices in order to reduce the amount of waste arising.

Question 4: Do you agree that voluntary measures should be tried before considering legislation?

Yes

Both the compositional analysis and the cost benefit analysis included in the consultation is very helpful and should give organisations confidence that the installation of public place recycling can bring both a financial as well as an environmental benefit. It will be important however, to track the uptake of public place recycling as a result of the introduction of the voluntary good practice guide and code of practice to see whether the launch of these documents do bring about the new wave of public place recycling by 2008 which the government wants to see take place.

Question 5: Do you agree with the rationale set out in section 3.1? i.e. Do you agree that there is a case for Government intervention, and that it should be in the form of a voluntary code of practice and good practice guide?

Yes the Authority does agree with the rationale set out in section 3.1 of the consultation document, which indicates that there is not an inherent market failure that prevents organisations providing recycling opportunities for public use and that government guidance and information setting out the case for public place recycling would help to encourage more organisations to provide such facilities.

Yes the Authority also agrees that there is a case for Government intervention, in the form of guidance, help and advice provided to support those who wish to introduce such schemes.

The voluntary code of practice and good practice guide are both very useful. However, the Authority also recommends that some additional support should also be available to help organisations considering the introduction of such schemes. This could be in the form of short training sessions and/or telephone support. Some advice should also be included in the guidance documents about the pros and cons of sponsored recycling bins and reference should also be made to recycling at events, which is a different type of service, but nonetheless, organisations looking for guidance on 'public place recycling' might also need to consider and expect to see advice about how best to manage short term increases in visitor numbers and recyclables collected as a result of special events.

Question 6: do you agree that Government should recommend use of Recycle Now's iconography so that recycle bins for public use are consistent with the national recycling campaign?

Yes, the Authority supports Government recommendations for using national campaign branding on public place recycling bins.

However, it is also important to recognise that many local authorities have invested heavily in local branding to promote a sense of place and community. It would be helpful if the guidance documentation could show some examples, apart from contained within any of the case studies, of 'co-branded' recycling bins to demonstrate how it is possible for co-branded local authority and national recycling campaign branded recycling bins to sit alongside local authority only branded litter bins.

Question 10: Would organisations find it helpful to register that they are running schemes on a central website that the public and others can view?

The Authority does not believe that the organisations themselves would find it useful to register their public space recycling scheme(s) onto a central database unless the database was promoted in some way. It is the Authority's view that organisations are more likely to want to promote what they are doing themselves or alternatively log the information onto an existing website or database with minimum effort, such as logging the information onto www.recycle-more.co.uk which already includes a 'bank locator' where residents can search for on-street 'bring banks'/recycling centres.

The main benefit of a central database would be for government to see how far its encouragement of public place recycling was making a difference, i.e. as a way of measuring progress against anticipated roll out of services.

Questions in 'Part 4 - Evidence Base' of the Recycle on the Go Consultation Paper

Question 13: Do you have any 'evidence' that you would wish to submit?

No

Question 24: Do you have a view about sponsorship of on-street recycling facilities? Is this something that you have pursued? What were the outcomes?

Whilst sponsorship of on-street recycling facilities is not something that the NLWA as a disposal authority has pursued, the Authority notes that any assistance or practical advice the Government can give on mitigating costs will be welcome.

Questions in 'Part 5 - Proposed Voluntary Code of Practice' of the Recycle on the Go Consultation Paper

Question 28: Do you agree with the first principle of the Voluntary Code of Practice (at Part 5) on the provision of containers for recyclable waste alongside those for non-recyclable waste.

Yes, it is a good theoretical principle to say that the provision of containers for recyclable waste should be alongside those for non-recyclable waste, but one which might not work in practice. It is also a principle which is not necessarily consistent with existing on-street recycling bank provision, where there are frequently a number of 1,100 litre on-street recycling bins but either no waste containers, or simply a small litter bin alongside. Outside train stations in London, there are also often recycling containers for paper for example, targeting newspaper 'waste' but no other containers or refuse bins. It would be a 'backward' step, that if by signing up to the code of practice, organisations and authorities were 'forced' to put in litter bins alongside recycling bins where there weren't any litter bins before. Similarly it might not always be desirable to have recycling bins alongside litter bins, e.g. it might be better to put recycling bins in first along a street with a 'usual flow' of pedestrian traffic likely to be generating waste and litter and then have litter bins further down the street, to encourage recycling in the first instance, litter disposal as a secondary choice.

It is recommended that this principle is re-worded to say that where there are bins for non-recyclable waste provision of bins for recyclable material should also be provided within the vicinity to encourage people to recycle in preference to disposal, but that street-scene safety and other management issues (including minimising street 'clutter') may be given priority locally if desired.

Question 29: Do you agree with the second principle of the Voluntary Code of Practice (at Part 5) that suggests that organisations installing recycle bins for public use should clearly promote recycling containers, including the adoption of common signage (i.e. the logos and colours) across England for recycling receptacles?

Yes the Authority supports this principle with the caveats outlined in the Authority's response to question 6.

Question 32: Do you agree with the fourth principle of the Voluntary Code of Practice (at Part 5) that suggests that organisations installing recycle bins for public use should reuse, recycle and compost the materials collected?

The Authority supports the above principle. However, the NLWA considers that recycling bins are most likely to be put in place for materials that can be recycled, rather than reused or composted.

Questions in 'Part 6 - Proposed Good Practice Guide' of the Recycle on the Go Consultation Paper

Question 39: Do you agree with the aim of the Good Practice Guide, which is set out in the introduction to the Guide at Part 6?

Yes the Authority agrees with the aim of the Good Practice Guide which is to set out practical considerations for organisations and managers seeking to establish recycling bin schemes alongside general litter collection in public places, and to help managers making informed decisions on how to implement public place recycling schemes in their own area.

Question 44: Is there any information missing from the Good Practice Guide?

Although the Authority does not service on street recycling banks or litter bins, the Authority suggests that any information which could be provided for new developments, e.g. planning information or example policies that could be contained in planning guidance for new buildings with public space attached would be helpful to ensure that recycling points became more part of the norm with new developments too.

Questions in 'Part 7 - Case Studies' of the Recycle on the Go Consultation Paper

Question 52: Are the case study examples given in Part 7 helpful? Are any not helpful?

Yes the case study examples given in Part 7 are all helpful as each provides full details of a public place recycling scheme which will be helpful for organisations and managers seeking to introduce such schemes in their area.

Question 54: Would a web-based repository of case studies that organisations can contribute towards be helpful?

Yes, based upon the Authority's experience of using the case studies associated with the national 'Recycle Now' campaign and associate website, a repository of case studies to which organisations can contribute would be useful.

Whilst the Authority has not responded to every question in the consultation paper, we trust that our response is informative and useful. If you require clarification on any of the points raised, please do not hesitate to contact me.

**Cllr. Brian Coleman AM FRSA
Chairman, North London Waste Authority**

Report Ends