

Consistency in Recycling Consultation,
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By email to: recycling@defra.gsi.gov.uk

Dear Sir/Madam

Ref: Consultation on consistency in household and business recycling collections in England

North London Waste Authority (NLWA) is pleased to have the opportunity to respond to the Government's consultation on consistency in household and business recycling collections in England

NLWA is the joint waste disposal authority for north London established by the Waste Regulation and Disposal (Authorities) Order 1985. As a joint waste disposal authority NLWA is responsible for the disposal of waste collected from over two million households and local businesses by seven north London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. NLWA manages the residual waste from all seven boroughs, recyclable and compostable waste from six boroughs and all the north London reuse and recycling centres except in one borough. NLWA also delivers extensive behaviour-change campaigns in the fields of waste prevention and recycling.

With static recycling rates in many areas, including our own, it is important to continue to strengthen existing approaches to encouraging greater levels of recycling. This means providing fewer options for residents and businesses to dispose of their recycling in other ways, pushing people harder to do the right thing with tools and levers in place to ensure material quality compliance.

If you have any questions about our response then please do not hesitate to contact me via the officer email below.

Yours faithfully

Cllr. Clyde Loakes
Chair, North London Waste Authority

Consultation on consistency in household and business recycling collections in England

February 2019

About you

1. What is your name? **Cllr Clyde Loakes**
2. What is your email address? Please email Barbara.Herridge@nlwa.gov.uk
3. Which best describes you?

Please tick only one option. If multiple categories apply to you please choose the one which **best describes you** and which you are representing in your response. (Required)

- Local Authority
- Waste management company
- Business representative organisation/trade body
- Product designer
- Manufacturer
- Distributor
- Retailer
- Reprocessor
- Community group
- Charity or social enterprise
- Independent consultancy
- Academic or researcher
- Individual
- Other (please provide details ...)

4. If you are responding on behalf of an organisation, what is its name?

North London Waste Authority (NLWA)

5. Would you like your response to be confidential? **No**

Part 1 Measures to improve the quantity and quality of household recycling collected by local authorities

Consultation questions on dry recycling

Proposal 1

We propose that all local authorities in England should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

Q5 Setting aside the details of *how* it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

- Agree – local authorities **should** be required, to collect a core set of materials
- Disagree – local authorities **should not** be required, to collect a core set of materials
- Not sure/don't have an opinion

Q6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

- Agree
- Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

We agree in principle to collecting a core set of materials but the practical achievement of collecting the core set of materials and providing a consistent service will depend on local circumstances and the infrastructure and proximity of processing and treatment facilities. The complexity of providing a consistent collection service in densely populated urban areas should not be underestimated.

Q7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

There are often storage constraints inside and outside multiple occupancy properties; there is often a higher transient population in these types of dwellings and accessibility of recycling bring sites particularly for residents in multiple occupancy dwellings is more challenging than for low-rise kerbside services. There are also more challenging drop off/waste and recycling transfer arrangements needed in densely populated urban areas and the service for flats is expensive too.

Q8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

Communications and engagement will need to be more focussed, so residents and landlords support the benefits of the services. Existing recycling facilities may need to be reviewed to ensure they meet the aims of this proposal, in particular with very limited in-flat storage, provision outside may need to be expanded.

Q9 Do you have any other comments to make about Proposal 1? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

Response to Q5: The details of the changes and therefore the details of any specific commitments including distribution of any funding between authorities would be decided following future consultations if the policies proceed as currently indicated. However, a key issue is that the changes to local authority collection systems that are proposed require confidence in long term commitments for increased financial support to local authorities too. There is a wide range of costs that might be affected by mandating the collection of six core dry recyclable materials. It is not clear from the proposals for example how the additional treatment/recycling capacity required to deliver the proposed changes will be provided and funded. We are therefore concerned to ensure that funding side of the changes is confirmed.

We are also concerned that the difficulties associated with inner-city recycling need to be recognised in both payment calculations and standards.

Over-arching comment: Service consistency will help with the transient nature of some flats' residents and communications messages should not need to be promoted so frequently. This will also help avoid those who move from one area to another questioning why an item suddenly can/can't be recycled when they move. This should assist with reducing the scepticism about recycling which can occur when members of the public relocate, and an item is not collected for recycling in the new area. So, a consistent service will help in the long term.

Proposal 2

We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

Q10 Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paper and card	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bottles	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic pots tubs and trays	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steel and aluminium tins and cans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q11 What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?

	This should be included in the core set from the start of Consistency	This should be included from the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bags and film	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other materials (please specify)				

Q12 If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.

Plastic films are currently a low value product, come in many forms, are confusing for people to identify one polymer type from another and therefore sort and more likely to be contaminated. Food and drink cartons have unreliable end markets and are difficult to process.

Q13 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

Possibly nappies. They are evident as a contaminant in the existing recycling services and there is technology available to treat these and other personal hygiene products.

Q14 Do you have any other comments to make about Proposal 2?

We would like to see local authorities be given the powers to enforce speedily and appropriately to tackle household recycling contamination, to help improve and raise participation, compliance and material quality.

Proposal 3

We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that

- a) evidence supports the benefits,
- b) there are viable processing technologies for proposed materials,
- c) there are sustainable end markets,
- d) local authorities would not be adversely affected, including financially.

Q15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- Yes
- No
- Not sure/don't have an opinion

Q16 Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

- Yes – but I would also add some (please specify which conditions you believe should be added ...)
 - No additional materials should be added without a clear case that their addition does not add excessive cost. Although the Government has said that local authorities will not be financially disadvantaged by the new collection requirements we remain concerned that the structure of the proposed payment calculations will inadequately recompense urban authorities such as our own.
 - Secondly, we are concerned that recycling collection systems may be altered as a result of the new requirements but that the money proposed for local authorities to transition and implement the new systems of collection is not maintained for the long term, so that we are left with an inadequately supported, and possibly more expensive collection regime. So, no new materials should be added without a further commitment on the longevity of additional financial support.

- No – some/all should be removed (if some please specify below)
- No – some should be added and some should be removed (please specify which ...)
- Not sure/don't have an opinion

Q17 Do you have any other comments to make about Proposal 3?

Nothing more to add

Consultation questions on separate food waste collection

Proposal 4

By 2023 we propose to legislate for local authorities to provide all kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners.

Q18 Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) services to be changed only as and when contracts allow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) providing free caddy liners to householders for food waste collections	<input type="checkbox"/>		<input checked="" type="checkbox"/>

Q19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

- Yes (if yes please provided further details below)
- No
- Not sure/don't have an opinion

Q20 Do you have any other comments to make about Proposal 4 including on circumstances where it may not be practical to provide a separate food waste collection?

The Mayor of London's London Environment Strategy is supportive of separate food waste collections and notes that:

"Despite many boroughs providing separate food waste collections, the amount of food waste recycled is very poor, with food waste making up around 25 per cent of non-recycled household waste, 60 per cent of which is avoidable, (ref 171). Food waste

can be composted or used to generate renewable energy, which would significantly improve London's recycling rate." The Strategy sets out a requirement for a minimum service level for local authority collections in the capital, namely to collect six main dry recycling materials and to provide food waste collections.

Reference 171 - WRAP (2012) Household food and drink waste in the UK. Accessed from: <http://www.wrap.org.uk/sites/files/wrap/hhfdw-2012-main.pdf.pdf>

The Authority supports a requirement for separate food waste collections on the grounds that:

- a) By separating food waste from the remainder of the rubbish, residents can see just how much food they are throwing away, which potentially encourages them to look more closely at food waste prevention – a preferable option to recycling.
- b) Turning the biodegradable element of the waste stream into digestate or compost provides a valuable soil conditioner, closing the loop and potentially providing gas too.
- c) A weekly food waste collection service improves the acceptability of an alternate weekly (or less frequent) residual waste collection service thereby providing collection authorities with the opportunity to use the 'stick' of restricting the volume of residual waste collected from residents in order to encourage greater levels of recycling.
- d) The presence of a food waste collection service has also been proven to reduce dry recycling contamination (with food waste) according to the Mayor of London's London Environment Strategy.
- e) Food waste recycling can make a valuable contribution to local authority collected waste (LACW) recycling rates – the London Environment Strategy for example includes a requirement for separate food waste collections, including from flats where practical and cost effective. This action is listed as a contributor to Policy 7.2.1. – achieving a 50% LACW recycling rate by 2025.
- f) Making separate food waste collections a requirement for local authorities also provides a sustainable feedstock to support the development of the anaerobic digestion (AD) industry and the investment in new treatment capacity. This in turn potentially introduces more competition and competitive AD gate fees. If gate fees for AD are similar to Energy-from-Waste then there is no incentive to collect food waste separately. Making food waste collections a requirement will potentially encourage the development of treatment solutions that are more environmentally and economically preferable.

However, we also recognise that it may not be easy to provide a cost-effective food waste collection service, particularly in flats where residents may struggle for indoor space for separate containers and where the physical barriers to participation may result in low participation rates. Although we also recognise that there are city authorities which have already overcome these barriers, any requirement for separate food waste provision will need adequate resourcing and a formula which recognises the relatively high costs of providing this service in dense urban areas.

Having noted the physical complexities of separate food waste collections, the Authority also notes that in some situations:

- a) the economic case for food waste collections may be difficult to justify, and
- b) the residual waste collection service will be depositing at a modern thermally efficient Energy-Recovery-Facility (ERF) i.e. potentially little different in environmental terms from anaerobic digestion,

In such cases we suggest that authorities should be able to request support from WRAP or Resource London/LWARB to assist in the development of a locally

appropriate food waste strategy. This strategy should take account of the net cost to the local authority, current and likely future participation levels as well as the benefits of introducing, retaining and/or extending an existing food waste service.

The provision of liners is a decision to be made by collection authorities dependent on local circumstances. There may be concerns for example that the provision of liners is expensive and depending on how they are sourced they may not be from a sustainable supplier or acceptable at the processing plant. For example, liners may be extracted through the preliminary de-packaging process at an AD plant and go for disposal rather than being composted or treated/recycled. AD infrastructure will need to be reviewed to ensure it is available and of sufficient capacity.

Proposal 5

We will provide funding and support to local authorities to help put in place the necessary collections infrastructure.

Q21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)

- I am not responding on behalf of a local authority
- Specific financial support (please specify)
- Procurement support, (e.g. free advice on renegotiating contracts; centralised purchasing of containers)
- Communications support, (e.g. free collateral that can be adapted and used locally)
- Technical support, (e.g. free advice from a consultant about round re-profiling)
- Other (please specify ...)

Q22 Do you have any other comments to make about Proposal 5?

The capital and revenue implications of rolling out a weekly food waste collection service including containment and liners can be significant. It is important that these are fully funded.

As a waste disposal authority (WDA) there will be an impact on waste and recycling contracts and on the communication materials we provide. It is imperative that any new burdens are appropriately funded from central sources to ensure cost neutrality for local authorities making the changes required. We procure the recycling contracts for mixed dry recycling and food and garden waste on behalf of our constituent boroughs (which includes AD for food waste) and there may be consequences we are not aware of, if these changes are implemented.

Proposal 6

We believe it would be desirable for local authorities that have contractual commitments with IVC facilities, which needs mixed garden and food waste, to require separate presentation of food waste but then be able to mix it with garden waste for treatment purposes. This is because our evidence shows that separate presentation of food waste leads to higher yields.

Q23 What are your views on this proposal?

This approach would allow flexibility so that a change to AD would be possible if facilities become available while maintaining optimum recycling levels of food waste. This is a policy that some of our constituent boroughs have already adopted.

Consultation questions on collecting garden waste

Proposal 7

We are seeking views on whether households generating garden waste should be provided with access to a free collection service. If introduced this this would be a minimum fortnightly collection service of a 240-litre capacity container (either bin or sack). Local authorities may provide additional capacity or more frequent services and would be able to charge for this additional provision.

Q24 Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) a free garden waste collection for all households with gardens	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) A capacity to 240l (bin or other container e.g. sack)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) A fortnightly collection frequency (available at least through the growing season)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(v) this new requirement to start from 2023 (subject to funding and waste contracts)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q25 Do you have any other comments to make about this proposal

As these questions refer directly to collection arrangements these questions are best answered by the waste collection authorities. The Defra modelling work suggests that by introducing free garden waste collections, local authority recycling rates could go up by six percentage points on average. However, a number of authorities in the country as a whole argue that they have not seen any material loss of green waste under charging arrangements and therefore that the 6% assumption would be extremely unlikely to be borne out in practice. We are therefore concerned that this measure would achieve its aims, especially as the funding to local authorities in lieu of charging is uncertain.

Consultation questions on separate collection to improve quality

Proposal 8

In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality. We propose to amend the law to clarify this and will include guidance in our proposed statutory guidance on minimum service standards to help local authorities and waste operators in decision making on separate collection.

Q26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

- Yes
- No (why ...?)
- Not sure/no opinion/not applicable

Q27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.

The space constraints in urban environments make it difficult for residents and businesses to separate their waste and recycling. This will be exacerbated as recycling targets increase and more material needs to be separated. For these very reasons the north London boroughs moved to commingled collections which was supported by the outputs from TEEP assessments. Commingled collections are especially helpful where there are alternate week collections. Operationally a move to separate collections could result in additional vehicles being required due to the extra sorting of materials which may have health and safety implications concerning increased manual handling, traffic and emissions. There may also be less of an argument for separate collections when glass has been largely removed from the kerbside collected recycling stream following the introduction of a DRS. It would therefore be helpful to review following implementation of the DRS. Any changes would also need to be assessed based upon local circumstances.

Q28 Do you have any other comments to make about Proposal 8? **No**

Consultation questions on bin colour standardisation

Proposal 9

Assuming that we progress with proposals for a core set of materials that must be collected for recycling, the government welcomes views on whether England should move to standardised waste container colours for those materials, together with residual waste, food and garden waste.

Q29 Do you agree or disagree with this proposal?

- Agree – bin colours **should** be standardised for all waste streams
- Agree in part – bin colours should be standardised for some waste streams but not all (**for paper/card, cans, glass and plastics, commingled**)

- Disagree – bin colours **should not** be standardised for any waste streams
- Not sure/no opinion/not applicable

Q30 There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?

- Phased approach 1 – as and when waste contracts are renewed
- Phased approach 2 – as and when old/unserviceable bins are replaced
- Other ways please specify...

Q31 Do you have any other comments to make about Proposal 9?

To standardise bins the approach could be a combination of when old bins are replaced and when there are services changes as renewed contracts don't necessarily mean new services and / or containers.

Any changes to containers should be fully paid for by Government, including disposal of existing containers.

Consultation questions on service standards

Proposal 10

We are proposing to prepare statutory guidance on minimum service standards to which local authorities will be required to have regard. The detail of this guidance will be consulted upon in our second consultation

Q32 Do you agree or disagree with the proposal to publish statutory guidance?

- Agree – government **should** publish statutory guidance
- Disagree – government **should not** publish statutory guidance
- Not sure/no opinion/not applicable

Q33 We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable

Q34 Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week Do you agree or disagree with this proposal?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable

Q35 Do you have any other comments to make about Proposal 10? **No**

Consultation questions on communicating about recycling

Proposal 11

We will continue our support for Recycle Now and the tools produced by WRAP to help local authorities to communicate effectively on recycling.

Q36 Do you have any comments to make about Proposal 11?

The tools produced by WRAP are helpful in providing consistency of messaging. Secondly they are useful to use because we know that they are supported by robust research which gives confidence in using them. However, in NLWA we have not used WRAP Recycle Now tools extensively to date because:

- a) we often have other communications priorities at the times when WRAP is recommending promotion of recycling.
- b) because it has not always been possible to adapt WRAP materials to meet local circumstances.
- c) because we have sometimes wanted to do something slightly different or specifically targeted to a particular demographic in north London which is not accommodated within WRAP's national suite of materials.

Q37 What information do householders and members of the public need to help them recycle better?

Clear information on what can and can't be recycled, what happens to recycling and waste after collections and the potential environmental impacts if it is not managed responsibly. They would also benefit from instructional information for any service changes and how to report issues if there is a problem or how to get more information if required.

Proposal 12

We will work with local authorities and others to improve transparency of information available to householders on the end destination for household recycling.

Q38 Do you agree or disagree with this proposal?

- Agree – government **should** work with local authorities and other stakeholders on this
- Disagree – government **should not** work with local authorities and other stakeholders on this
- Not sure/no opinion/not applicable

Q39 Do you have any other comments to make about Proposal 12? **No**

Consultation questions on end markets

Proposal 13

Q40 Please use this space to briefly explain any comments you have on the issues discussed in this section.

It would be good to go a step further than the plastics tax on items with less than 30% recycled content and also include other products / materials linking this in with procurement requirements to include recycled content.

Consultation questions on non-binding performance indicators

Weight based metrics are less ambiguous than some alternative metrics and will continue to be needed going forwards as they are required as the basis for calculations of carbon dioxide equivalent emissions for example. However, we are also supportive of introducing additional measurements.

Proposal 14

We propose developing a set of non-binding performance indicators for local authorities to use to monitor waste management and recycling and to highlight where services can be improved to deliver higher recycling and minimise waste. In addition to the headline household recycling rate for the local authority we would propose 4 additional indicators covering the yields of dry recycling, food waste for recycling, garden waste for recycling, and residual waste. We would also work with local authorities to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

Q41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q42 Do you agree or disagree that the proposed indicators are appropriate?

- Agree
- Disagree (please expand ...)
- Not sure/no opinion/not applicable

Q43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

Non binding indicators would be useful for benchmarking purposes and as long as they are not resource intensive.

Consultation questions on alternatives to weight-based metrics

Proposal 15

We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these as set out in the Resources and Waste Strategy.

Q44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q45 Do you agree that these alternatives should sit alongside current weight-based metrics

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

We would welcome additional indicators such carbon dioxide equivalent emissions per tonne of waste managed because this allows for the environmental impact of lighter waste materials to be factored into decision-making. In London we already provide carbon equivalent emissions information. Additional indicators that could be considered include social benefit indicators as well as some metrics to better reflect the impact of waste prevention activities. We would welcome the opportunity to input into further consultation on metrics.

Consultation questions on joint working

Proposal 16

We want to support and enable greater collaboration and partnership working between authorities where this would accelerate the move to consistent collections and improve recycling and delivery of services.

Q47 in what way could greater partnership working between authorities could lead to improved **waste management and higher levels of recycling?**

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q48 What are the key barriers to greater partnership working?

We agree with all the barriers (a - g) that are identified. The main benefits of joint working appear to be more economic than performance related. The overall recycling rate may increase but there may be hidden inequalities of those boroughs that invest and put in the effort and those that don't.

Q49 How might government help overcome these barriers?

Targeted resources for the poorer performing boroughs may help. Some of the other issues such as political differences are more difficult and possibly these could be overcome with an overhaul of the borough boundaries and reduction in local authorities.

Q50 Do you have any other comments to make about Proposal 16? **No**

Part 2 Measures to improve recycling by businesses and other organisations that

Consultation questions on measures to increase recycling from business and other organisations that produce municipal waste

Proposal 17

We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to legislate so that these establishments have to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste operators.

Q51 Do you agree or disagree that businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q52 Which of the 3 options do you favour?

- Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling
- Option 2 mixed dry recycling and separate food recycling; no glass recycling
- Option 3 mixed dry recycling, separate glass recycling, separate food recycling
- Something else (please expand ...)

Why not consider option 1 but separate paper and card rather than separate glass and separate food. Paper and card is a higher value material and needs to be clean, so why not have that as the separate material stream?

- Not sure/no opinion/not applicable

Q53 We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on where this may not be practicable for technical, environmental or economic reasons

- Yes – it should be practicable to segregate waste for recycling in all circumstances
- No – some exceptions are needed for particular circumstances (please provide examples below)
- Not sure/no opinion/not applicable

- Q54 Should some businesses, public sector premises or other organisations be exempt from the requirement?
- Yes (which ones and why ...?) We expect there will be a need for some exemptions but businesses are better placed to determine this.
 - No
 - Not sure/no opinion/not applicable

- Q55 Do you have any other comments to make about Proposal 17? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

All businesses should be legally required to recycle their recyclable core waste items including food waste and failure to do so should result in an FPN fine or prosecution.

It would be good to learn from the experiences in Scotland which has already introduced legislation to require businesses to recycle.

Proposal 18

Where a business, public body or other organisation produces sufficient quantities of food waste we propose to legislate for this to be separated from residual waste and arrangements made for it to be collected and recycled.

- Q56 Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

- Q57 Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

- Q58 Do you have any views on how we should define 'sufficient' in terms of businesses producing 'sufficient' quantities of food waste to be deemed in scope of the regulations?

We suggest that 'sufficient' is more than 20 kgs. However, this would need to be assessed with other factors. If a contractor collects from multiple points in once street that makes economic sense but if the collection points are far apart the min weight would need to be higher to make it worthwhile.

- Q59 Do you have any views on how we should define 'food-producing' businesses?

Any business whose sole purpose is to process, manufacture or sell food to generate 50% or more of their revenue.

Q60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?

- Yes (which ones and why ...?)
- No
- Not sure/no opinion/not applicable

Q61 Do you have any other comments to make about proposal 18? **No**

Proposal 19

If the proposals above are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the impact on small and micro businesses.

Q62 What are your views on the options proposed to reduced costs?

Consider providing concessions for businesses under a certain size or for certain recycling streams such as food waste

Q63 Are there other ways to reduce the cost burden that we have overlooked?

To provide tax relief or funding to the businesses until they realise the benefits of changing their waste management systems.

Q64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

It would be worthwhile to have some sort of advice/ helpline during the transition period to support businesses making this change.

Business waste data

Proposal 20

As part of implementing consistency, we will work with waste producers and waste collectors in the non-household municipal sectors to improve reporting and data capture on

waste and recycling performance of businesses and other organisations. Any requirements will be subject to consultation.

Q65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

It will be good to get this information if possible as it is not currently easy to get accurate non-household municipal waste data and it will help manage this element of the waste stream more effectively.

Q66 Do you have any other comment on Proposal 20?

Please note that this response is submitted by the North London Waste Authority. The seven collection authorities in the NLWA area – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest will also be submitting responses to the consultation. Individual borough views may vary from the points made in the NLWA response here.