

REPORT TO: Executive Board

DATE: 26 February 2015

REPORTING OFFICER: Strategic Director - Communities

PORTFOLIO: Environmental Services

SUBJECT: The Waste (England and Wales) (Amendment) Regulations 2012 Compliance Assessment.

WARD(S): Borough-wide

1. PURPOSE OF REPORT

- 1.1 The purpose of the report is to advise Members of the Executive Board of the requirements of the Waste (England and Wales) (Amendment) Regulations 2012 (“the Regulations”), and;
- 1.2 To seek endorsement of the outcome of an assessment of the Council’s household waste collection system that has been undertaken to demonstrate the Council’s compliance with those Regulations.

2. RECOMMENDED: That

- 1) **Executive Board approve the outcome of the assessment of the Council’s co-mingled recycling collection system which demonstrates the Council’s compliance with Regulations 12 and 13 of The Waste Regulations (England and Wales) 2011 (Amended 2012); and**
- 2) **a re-evaluation of the Council’s methodology for the separate collection of paper, glass, plastics and metals be undertaken in 3 years time or at any time should there be any significant change in circumstances which may affect the Council’s position on separate collections.**

3. BACKGROUND

Relevant Legislation and Regulations

- 3.1 The EU Waste Framework Directive provides the legislative framework for the collection, transport, recovery and disposal of waste. The directive requires all member states to take the necessary measures to ensure waste is recovered or disposed of without endangering human health or causing harm to the environment and includes permitting, registration and inspection requirements.

- 3.2 The directive also requires member states to take appropriate measures to encourage firstly, the prevention or reduction of waste production and its harmfulness and secondly the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy. The Directive's requirements are supplemented by other directives for specific waste streams.
- 3.3 The Waste (England and Wales) (Amendment) Regulations 2012 were laid before Parliament and the Welsh Assembly on 19th July 2012 and came into force on 1st October 2012. The amended regulations relate to the separate collection of waste. They amend the Waste (England and Wales) Regulations 2011 by replacing regulation 13.
- 3.4 From 1st January 2015, waste collection authorities must (subject to exceptions – see para 3.6 below) collect waste paper, metal, plastic and glass separately. It also imposes a duty on waste collection authorities, from that date, when making arrangements for the collection of such waste, to ensure that those arrangements are by way of separate collection.
- 3.5 DEFRA defined 'co-mingling' (the placing of paper, metal, plastic and glass into a single container) as a form of separate collection in its original transposition of the Directive into UK legislation, however this was challenged and DEFRA amended the regulation by removing the reference to 'co-mingling' to follow the wording of the Directive more closely. The regulation allows 'co-mingling' after January 2015 in certain circumstances and, despite legal challenge, the wording was upheld after Judicial Review.
- 3.6 The aim of the Regulations, which apply to household and commercial waste, is to maximise the economic opportunities and environmental benefits associated with higher quality recycling and require the separate collection of paper, glass, plastic and metal unless:
- It is not necessary to produce high quality recyclates, and
 - It is not technically, environmentally and economically practicable to do so.

Enforcement

- 3.7 The Environment Agency (EA) is responsible for regulating compliance with the Regulations in England. The EA have written to Councils advising them of the need to have an assessment in place to demonstrate compliance with the Regulations. The EA approach suggests they will contact all Waste Collection Authorities by March 2015 to request information on collection methods and potentially to seek evidence on application of the Waste Regulations Necessity and Practicability (TEEP) Tests. The EA information indicates that enforcement action will be prioritised on those that have made little or no attempt to apply the regulations and/or do not respond to requests for information.

4. SUPPORTING INFORMATION

- 4.1 There is no Statutory Guidance on how to interpret the separate collection requirement or implement the regulations. However, a group of organisations, including waste sector representative bodies and the LGA worked together to produce the 'Waste Regulations Route Map'; to act as a framework to guide waste collection organisations in meeting the requirements of the regulations.
- 4.2 The Route Map does not identify whether to collect recycling separately or co-mingled and Council's need to take their own local circumstances into account in evidencing their decision on the recycling collection systems they deliver.
- 4.3 The Route Map does set out a series of Key Steps that Councils can follow to assess their compliance with the Regulations;

Route Map – Key Steps

INFORMATION GATHERING

- Step 1 – Identify current waste collection arrangements
- Step 2 – Identify how these materials are currently treated

ASSESSMENT

- Step 3 – Apply the waste hierarchy
- Step 4 – Decide whether separate collection of the 4 materials (glass, metal, paper, plastic) is required

APPROVAL AND REVIEW

- Step 5 – Obtain Sign-off
 - Step 6 – Retain Evidence
 - Step 7 – Review Process
- 4.4 An assessment of the Council's compliance with the Regulations, using the Route Map, has been carried out. Full details of the assessment and the outcome are contained in Appendix 2.
- 4.5 Deciding whether separate collection of glass, metal, paper and plastic is required (Step 4) is the key step in the route map in terms of compliance with the Regulations' separate collection requirement. Attached as Appendix 1 is diagram which summarises the approach to making this decision.

- 4.6 The Regulations do not require the best performing recycling system, but one that delivers reasonable performance at reasonable cost after taking into account local considerations, including affordability. The core of the Necessity Test is whether separate collection is necessary to “facilitate or improve” recovery. If not, then co-mingling may be acceptable.
- 4.7 The terms ‘Facilitate’ or ‘Improve’ are not defined in the legislation but could be interpreted as meaning;
- “making recycling possible or easier” and
 - “more material is recycled” and / or more recycling is made up of a “high quality”

5.0 OUTCOME OF ASSESSMENT

- 5.1 As set out in Section 5 of Appendix 2, after applying The Necessity Test, **it is deemed that separate collections of glass, metal, paper and plastic is not necessary to ensure that waste is recycled and to facilitate improved recovery as identified by Regulation 13 of the Waste England and Wales Regulations 2011.** This is predicated on the basis that the Council’s current co-mingled method of recycling provides the following outputs:-
- A simple and easy to use system for residents;
 - Increasing levels of recycling since 2007, with a high level of recycling performance of over 40% projected for 2014/15;
 - Good quality input material for MRF processing, and;
 - Good quality MRF output materials that meet re-processor market standards for subsequent recycling within a closed-loop recycling system.
- 5.2 On the basis the Council has deemed it not necessary to carry out separate collections of glass, metal, paper and plastic it has not applied the Practicality Test of the Route Map to the four waste materials. Notwithstanding this, as set out in Appendix 2, consideration was given to aspects of the Practicability Test. Whilst recognising that technically it is possible to collect the four materials separately, the unviable economic aspects of reverting to a separate collection service would make it impracticable to do so.
- 5.3 The assessment process has been reviewed by the Portfolio Holder for Environmental Services, the Operational Director for Legal & Democratic Services and the Divisional Manager for Waste and Environmental Improvement Services, who are all satisfied with the outcome. The Route Map recommends that once completed, the outcome of the assessment is formally signed-off. Executive Board are therefore asked to consider the assessment undertaken and approve the outcome; that the Council’s current co-mingled recycling service is compliant with Regulation 13.

6.0 FINANCIAL AND RESOURCE IMPLICATIONS

6.1 As the outcome of the assessment of the Council's current system for collecting paper, glass, plastics and metals has determined that alternative separate collection arrangements are not necessary, there are no financial implications arising from this report.

7.0. POLICY IMPLICATIONS

7.1 There are no policy implications as a result of this report.

8.0 IMPLICATIONS FOR THE COUNCIL'S PRIORITIES

8.1 Children and Young People in Halton

None identified.

8.2 Employment, Learning and Skills in Halton

None identified.

8.3 A Healthy Halton

None identified.

8.4 A Safer Halton

None identified.

8.5 Halton's Urban Renewal

None identified.

9.0 RISK ANALYSIS

9.1 There is a significant risk of enforcement action being taken by the Environment Agency (EA) should the Council have not carried out an assessment of its compliance with the Regulations, or should it fail to provide evidence of the assessment process. Whilst an assessment has been carried out and the Council is satisfied that its current service delivery methodology is compliant with Regulation 13, given that it will be maintaining its co-mingled recycling service, the EA may still scrutinise the Council's assessment. Should this occur the Council may need to provide further evidence to support its decision.

10.0 EQUALITY AND DIVERSITY ISSUES

10.1 None identified.

11.0 LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972

11.1 There are no background Papers under the meaning of the Act.

HALTON BOROUGH COUNCIL

**RESPONDING TO THE REQUIREMENTS OF
REGULATIONS 12 AND 13 OF
THE WASTE REGULATIONS
(ENGLAND AND WALES) 2011
(AMENDED 2012)**

The following assessment of the Council's compliance with Regulation 12 and Regulation 13 of the Waste Regulations (England and Wales) 2011 (amended 2012) has been made by the Council using the Waste Regulations Route Map (April 2014) prepared on behalf of local authority waste networks, the London Waste and Recycling Board and WRAP.

December 2014

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1. INTRODUCTION

- 1.1 As a Unitary Authority Halton Borough Council (the Council) arranges for the collection of household and commercial waste within the borough of Halton under the Environmental Protection Act 1990 (Section 45).

Waste for recycling is transferred by the Council to a Merseyside Recycling & Waste Authority (MRWA) facility for processing by way of long term contractual arrangements between the two Authorities. Residual waste is currently delivered to a private contractor for treatment and use in an Energy from Waste (EfW) facility via a Halton interim treatment contract.

- 1.2 The Council and MRWA, alongside the other five Merseyside local authorities (Knowsley, Liverpool, Sefton, St Helens and Wirral), form the Merseyside and Halton Waste Partnership.

The Merseyside authorities have an approved Joint Recycling and Waste Management Strategy; *RESOURCES Merseyside 2011-2041*, that sets targets in respect to moving the management of municipal waste as far up the European Union (EU) Waste Hierarchy as is practically and economically feasible.

Halton has a separate Waste Management Strategy which included the following targets which are relevant to this assessment:

- a) To recycle at least 40% of household waste by 2020
- b) To seek to develop high quality outputs from the recycling and composting processes and meet standards wherever practicable.
- c) To maximise the recovery of recyclable and biodegradable materials through kerbside collection services and bring schemes
- d) To deliver an awareness raising campaign to promote the improved collection services (encourage participation and reduce contamination) to all residents
- e) To increase the provision of Neighbourhood Recycling Facilities, in addition to Household Waste Recycling Centres in order to ensure members of the community can access and participate in recycling schemes.

A copy of Halton's strategy document is available on request.

The Merseyside Joint Strategy can be found at;
<http://www.merseysidewda.gov.uk/waste-strategy/resources-merseyside-2011-2041/>

1.4 The Merseyside and Halton Partnership is delivering against these outcomes through a range of activities highlighted below, delivered through public, private and community sector agencies:-

- a) Waste prevention and minimisation initiatives;
- b) Waste collection operations;
- c) Household Waste Recycling Centres (HWRCs);
- d) Community bring-site recycling facilities;
- e) Green garden waste composting;
- f) MRWA Waste Management and Recycling Contract (WMRC) with Veolia Environmental Services Ltd;
- g) MRWA Resource Recovery Contract (RRC) with SITA UK Ltd;
- h) Halton waste residual treatment contracts;
- i) MRWA landfill disposal contracts; and
- j) Waste and Recycling Collection Policies.

1.5 Through these approaches both Halton's and the Partnership's current combined household waste recycling performance is circa 40%.

2. ROUTE MAP STEP 1: DETERMINE WHAT WASTE IS COLLECTED AND HOW

2.1 Table 1 below provides information on the Council's waste collection service and forecast performance for 2014/15.

Table 1: Halton Borough Council Waste Collection Context Information 2014/15	
Halton Population	125,700
Total number of households	55,993
Number of households receiving the following services:	
Residual waste collection	Wheeled Bins - 52,893 / Plastic Sacks - 3,100
Recycling collection	Wheeled Bins - 52,233 / Boxes - 3,760
Green garden waste	41,490
Food waste	0
2014/15 forecast household waste recycling performance (%)	40.00%
2014/15 forecast waste per household per annum (kg)	622kg

2.2 The Council has designed its waste collection services and associated policies in order to maximise the following environmental benefits:-

- a) Waste prevention;
- b) Waste minimisation;
- c) Waste material recycling / composting performance; and
- d) Waste to landfill diversion.

The Council's current Household Waste & Recycling Collection Policy is available on request.

2.3 The Council's model of waste collection, integrated with the MRWA waste recycling/treatment contracts, also has due regard to the following critical factors:-

- a) Ease of use by the population of Halton;
- b) The significant and on-going financial pressures faced by the Council; and
- c) The need to maximise the income associated with the household waste resource.

2.3 Through the introduction of a co-mingled recycling collection service in 2007 and an alternate weekly bin collection system in 2011 the Council has been able to respond to the above factors and increase household recycling performance from 25% in 2007/08 to a projected level of over 40% in 2014/15. This step change in performance and the associated service design changes were introduced following successful pilot schemes and community feedback.

The services have also been subject to Council scrutiny which has led to the formal adoption of the current methods of waste collection/treatment. Documents that evidence community feedback, Council scrutiny and approval are available on request.

2.5 The Merseyside and Halton Waste Partnership undertook a waste composition analysis of its household waste in 2010.

Table 2 overleaf shows the waste composition study average figures for Halton based on weight %.

Table 2 – Halton Waste Composition Analysis				
Primary Category	Residual Waste	Garden Waste	Dry Recyclables	Combined
Paper	11.1%	0.0%	45.3%	15.1%
Card	6.0%	0.3%	13.0%	6.3%
Plastic (dense)	9.3%	0.1%	7.1%	7.6%
Plastic (film)	6.2%	0.0%	0.4%	4.4%
Textiles	4.6%	0.0%	0.0%	3.2%
Miscellaneous Combustibles	5.9%	1.1%	0.1%	4.2%
Glass	5.7%	0.0%	28.1%	8.6%
Miscellaneous Non-combustibles	2.0%	0.0%	0.1%	1.4%
Metal (ferrous)	3.5%	0.0%	3.5%	3.0%
Metal (non - ferrous)	1.5%	0.0%	1.5%	1.3%
WEEE	2.7%	0.0%	0.1%	1.9%
Hazardous	0.6%	0.0%	0.0%	0.4%
Organic Catering	33.3%	0.4%	0.2%	23.1%
Organic Non-Catering	5.0%	98.1%	0.4%	17.8%
Fines	2.6%	0.0%	0.2%	1.8%
Total	100.0%	100.0%	100.0%	100.0%

The full waste composition analysis can be accessed via the link below, with separate sections available for survey results for each individual authority and for the Partnership as a whole. It should also be noted that a further analysis is planned to be undertaken in 2015.

<http://www.merseysidewda.gov.uk/wp-content/uploads/2012/10/RESOURCES-Waste-Composition-Final-Report-A.pdf>

- 2.6 It is against the backdrop of this waste composition analysis that the Council has sought to maximise the variety and quantity of the waste material that Halton's residents can divert from landfill or residual waste treatment through the range of Council waste collection services.

Table 3 below overleaf provides an estimate of available tonnage for specific materials based on the waste composition analysis.

Table 3 – Estimated Recyclable Material Tonnages		
Material	Composition %	Equivalent Tonnes*
Paper	15.1	6580.29
Glass	8.6	3747.72
Card	6.3	2745.42
Metal	4.3	1873.86
Plastics	7.6	3311.94

**Based on combined annual kerbside tonnage of 43,578.14 for 2013-14*

2.7 The Council's waste collection services are delivered in-house and a description of the service model for 2014/15 is identified in Table 4 below.

Table 4 – Halton Borough Council Waste Collection Service Model 2014/15	
Service Provision over two week cycle (29,534 Households)	Bin capacity (litres)
Week 1	
Residual waste (black bin)	240
Week 2	
Residual waste (black bin)	240
Co-mingled recycling (blue bin)	240
Green garden waste (green bin) (seasonal)	240
Total bin capacity per household over 2 week cycle	960

Service Provision over two week cycle (3,100 Households)	Bin capacity (litres)
Week 1	
Residual waste (black sack)	240
Week 2	
Residual waste (black sack)	240
Co-mingled recycling (blue box)	44
Total receptacle capacity per household over 2 week cycle	524

Service Provision over two week cycle (23,359 Households)	Bin capacity (litres)
Week 1	
Residual waste (black bin)	240
Week 2	
Co-mingled recycling (blue bin)	240
Green garden waste (green bin) (seasonal)	240
Total bin capacity per household over 2 week cycle	720

2.8 The net cost of delivering the Council's waste collection service during 2014/15 is £2.85m, of which the co-mingled recycling service accounts for £516k (direct collection costs only).

2.9 Co-mingled recycling Service

As shown in Table 2, the Council provides a co-mingled recycling service to all households in Halton. In the main, 240 litre blue wheeled bins are used by residents to collect the items listed in 2.10 below for recycling, which are emptied by the Council on a fortnightly collection cycle. The Council uses 26 tonne refuse collection vehicles (RCVs) to make these collections, with each collection crew made up of one driver and two collectors.

Collected recyclable materials are delivered by the Council's RCVs to the MRWA Material Recovery Facility (MRF) at Gillmoss Waste Transfer Station, Liverpool. The MRF is operated by Veolia Environmental Services Ltd under the long-term Waste Management and Recycling Contract with MRWA and Halton.

Vehicle payloads are restricted to 7 tonnes and low compaction of the comingled payload is compulsory to ensure the input of high quality materials to the MRF. This is in line with the contractual acceptance protocol for the facilities and designed to improve the quality of the output materials which are sent to reprocessor destinations.

2.10 Items of household waste that are permitted for co-mingled recycling are as follows:-

- a) Glass bottles and jars;
- b) Plastic bottles;
- c) Paper;
- d) Card; and
- e) Food and drinks cans.

2.11 Green Garden Waste Composting Service

In addition to the above items, the Council provides a kerbside garden waste collection service to approximately 41,500 households on a fortnightly basis during the period March to November. Residents, through the use of 240 litre green bins, are able to send the following items for composting:-

- a) Grass cuttings
- b) Hedge clippings, Small branches, Twigs and Leaves
- c) Cut flowers/plants
- d) Bark

2.12 The Council uses 26 tonne RCVs (driver plus two loaders) to make these collections. This material is delivered by the Council's RCVs to the Haddocks Wood open windrow composting facility in Runcorn, operated by Veolia Environmental services as part of the Merseyside and Halton Waste Management and Recycling Contract. This site also receives garden waste from Halton's two Household Waste Recycling Centres (HWRC's)

2.13 Residual Waste Collection Service

At the time of completing this assessment, the Council collects waste that is not suitable for co-mingled recycling or green garden waste composting from half of Halton's households on a fortnightly basis (roll out of service due for completion in early 2015). Residents, in the main, use 240 litre grey wheeled bins to store this waste which is collected by the Council using 26 tonne RVCs (driver plus two loaders). Where properties will not be served by an alternate weekly collection of residual waste, the Council will restrict the amount of residual waste that it will collect on a weekly basis to approximately 120 litres.

This residual waste is currently delivered under a contractual arrangement to WSR Recycling Limited for pre-treatment and onward transport to an Energy from Waste facility.

From 2017/18 this material will be treated via the Merseyside and Halton Resource Recovery Contract (see 3.13 Energy Recovery, for further details).

2.14 Items of household waste permitted for collection via the residual waste collection service include:-

- a) Food waste; and
- b) General waste items that cannot be recycled.

2.15 Bulky Household Waste Collection Service

The Council provides, on request, a collection service for bulky household waste items (e.g. sofas, wardrobes and tables) for which it makes a charge of £21 per visit (for collecting up to 3 items, plus a further charge for each additional item up to 10). This waste is collected by the Council in a 7.5 tonne box van (driver plus one loader) and currently taken to the Bulky Bobs social enterprise company where the items are separated for re-use / recycling (where practically and economically possible).

2.16 Further information on the Council's waste collection services is provided via the following link;

<http://www3.halton.gov.uk/Pages/Bins/binsandrecycling.aspx>

2.17 Household Waste Recycling Centres (HWRCs)

The Council provides Household Waste Recycling Centres to Halton's residents. The Council's two HWRCs are managed by Veolia Environmental Services as part of the Merseyside and Halton Waste Management and Recycling Contract. A range of household waste materials can be recycled / composted via these sites in addition to those provided for through the Council's kerbside waste collection services referenced above. These additional items include:-

- a) Cartons (Tetrapak)
- b) Aluminium foil;
- c) Car batteries;
- d) Household batteries;
- e) Cooking oil;
- f) Electrical items and equipment;
- g) All light bulbs;
- h) Engine oil and oil filters;
- i) Furniture;
- j) Garden waste;
- k) Gypsum (plasterboard);
- l) Printer cartridges;
- m) Rubble;
- n) Scrap metal;
- o) Textiles/clothes/shoes;
- p) Timber/wood;
- q) Tyres;
- r) Rigid Plastics, and
- s) Soils.

2.18 Community bring-recycling sites

There are a number of neighborhood recycling sites within the borough which are available for the deposit of materials including glass, cans, paper, card and plastics

Further information on HWRCs and community bring-recycling sites is provided via the following web links:-

<http://www3.halton.gov.uk/Pages/Bins/Household-Recycling-Centres.aspx>

2.19 It will be noted that the Council's waste collection services are designed around the provision of a co-mingled household waste recycling service and the associated MRF infrastructure.

The Council has invested in fleet, wheeled bins and staff resources to deliver co-mingled recycling services. Furthermore the MRWA has previously awarded a 25 year Waste Management and Recycling Contract to Veolia Environmental Services which commenced in 2009. This incorporated the build and operation of a dedicated MRF at Gillmoss, the operation and upgrade of a MRF at Bidston, Wirral, the operation of a composting site in Runcorn and associated transfer and transport infrastructure. Therefore, ceasing the co-mingled recycling service in favour of a kerbside sort recycling operation would incur a significant and economically unviable cost to the Council (as well as the MRWA and the wider Partnership).

Contractual breaches including compensation events would be triggered if the Council changed the system of collection or withdrew from the current arrangement. This would result in significant financial penalty to the Council. Relevant contract information can be provided on request.

The MRWA has made significant investment with its contractor in MRF facilities, the costs of which will remain should those waste collection authorities operating co-mingled services (including the Council) introduce a new system of collection. Additionally such change would require a comprehensive communication campaign with residents and the re-introduction of a less user-friendly method of collection. Any change to the current recycling collection system is likely to have significant impact on participation and the associated performance, environmental and financial benefits.

Waste Communications Campaign

In 2008 the Council invested in a comprehensive and targeted communications and marketing campaign to bring about increased awareness amongst the residents of the borough. This was:

- based on co-mingled collections of recyclates.
- specifically aimed at diverting additional tonnage of materials for recycling
- aimed at increasing participation levels
- designed to be simple to use for residents
- provided for the best and most economical use of recycling bins in place for a single waste recycling stream (i.e. paper)

Effective and efficient communications is widely accepted as a vital element in driving up recycling performance and, recognising this fact, Members approved revenue growth for 2008/09 and 2009/10 to deliver an enhanced publicity and awareness raising programme.

To support the development of this programme an external communications specialist was commissioned to deliver training to a number of key Council officers, which focused upon the principals of successful communications and publicity. The communications campaign in Halton set out to achieve the following outcomes;

- Establishment of existing attitudes and habits towards recycling
- Increase awareness of recycling and waste minimisation in Halton
- Enhanced and increased use of existing recycling services and facilities
- Encourage increased participation and correct use of existing collection schemes
- Maintain awareness of new scheme and other recycling services
- Maintain highest levels of recycling possible during and beyond campaign

The subsequent campaign was made up of a number of key components, including;

- A Halton 'Brand' Development
- Direct marketing to each household in the borough (information packs)
- Public Roadshows, 'Doorstepping' and community engagement activities
- Media advertisement

The financial investment in the campaign was considered to represent value for money as a cost/value ratio analysis revealed increased landfill disposal cost savings were achievable as a result.

Halton's 'Rewards for Recycling' Scheme

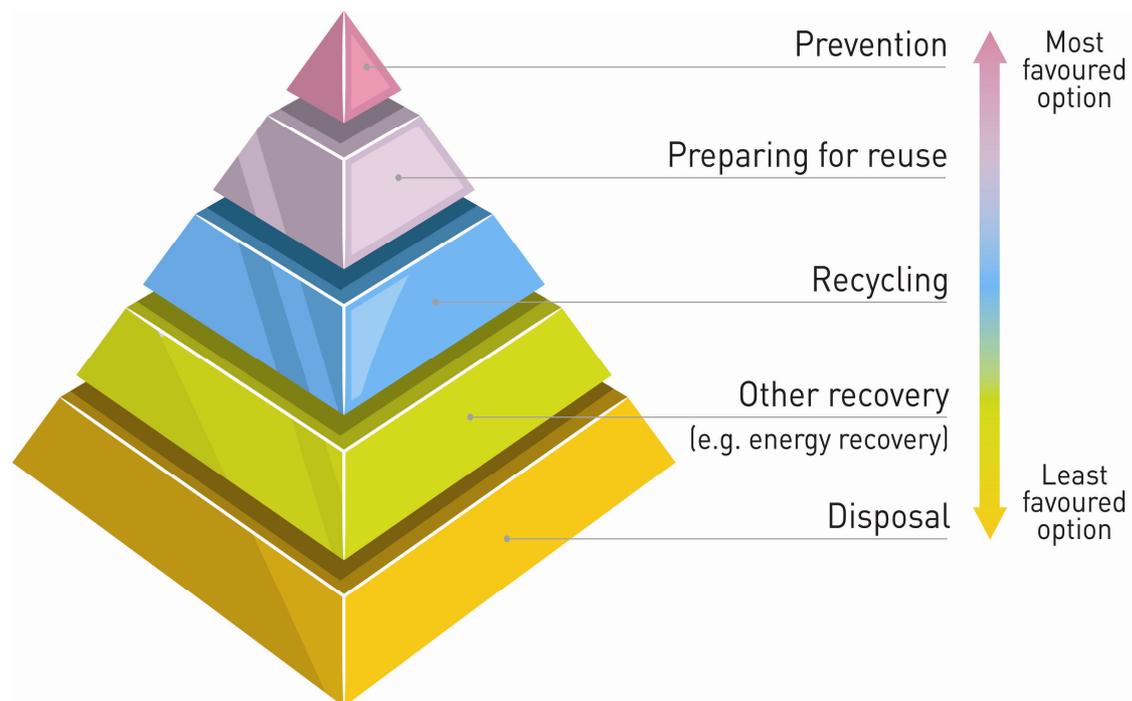
In 2009/10 the delivery of a pilot scheme to reward residents for co-mingled recycling received approval. The scheme, administered by RecycleBank (now Geenredeem) commenced in October 2009 and was implemented to 10,000 properties. Halton Borough Council became the first authority to apply an incentive scheme to an existing collection service, and only the second in the country to launch the scheme. Following a successful pilot the 'rewards for recycling' scheme was rolled out to all areas of the borough from the summer of 2010.

Maintaining a 'recycling rewards scheme' represents a significant investment in the promotion of kerbside co-mingled recycling by the Council.

3. ROUTE MAP STEP 2: CHECK HOW COLLECTED MATERIALS ARE TREATED AND RECYCLED

- 3.1 The Partnership's strategic focus is to move waste management higher up the Waste Hierarchy by supporting activities on waste prevention, re-use, recycling and composting whilst recognising the impact these actions have on the amount of residual waste requiring treatment or disposal. This programme of work is being delivered in a cost effective, affordable and value for money manner whilst optimising environmental benefits.
- 3.2 As such the Partnership, and the Council, is working towards managing municipal waste at the highest possible level in the Waste Hierarchy as possible to maximise environmental benefit. The Waste Hierarchy is shown in Figure 1 below.

Figure 1 - The Waste Hierarchy



Waste Prevention / Reduction and Re-use Activity

- 3.3 Waste minimisation actually prevents the generation of waste in the first place, so it is the most preferred method of waste management and goes a long way toward protecting the environment. There are solutions and ways in which everyone can help reduce the amount of waste we produce. Waste prevention, or 'waste minimisation', means consuming and throwing away less. It includes:-

- a) purchasing durable, long-lasting goods
- b) smart shopping: buying only what you need
- c) repairing what is broken or giving it to someone who can repair it
- d) seeking products and packaging that are as environmentally friendly as possible
- e) using local facilities like charity shops
- f) reducing junk mail
- g) Re-designing products to use fewer raw materials in production, have a longer life, or used again after its original use.

3.4 Further ways to reduce waste include repairing, donating to charity and community groups, or selling items that are no longer needed. Reusing products, when possible, is better than recycling because the item does not need to be reprocessed before it can be used again. The Council's current arrangement with Bulky Bobs for the refurbishment of unwanted bulky household items is an example of a re-use project. More waste prevention and re-use information can be found at;

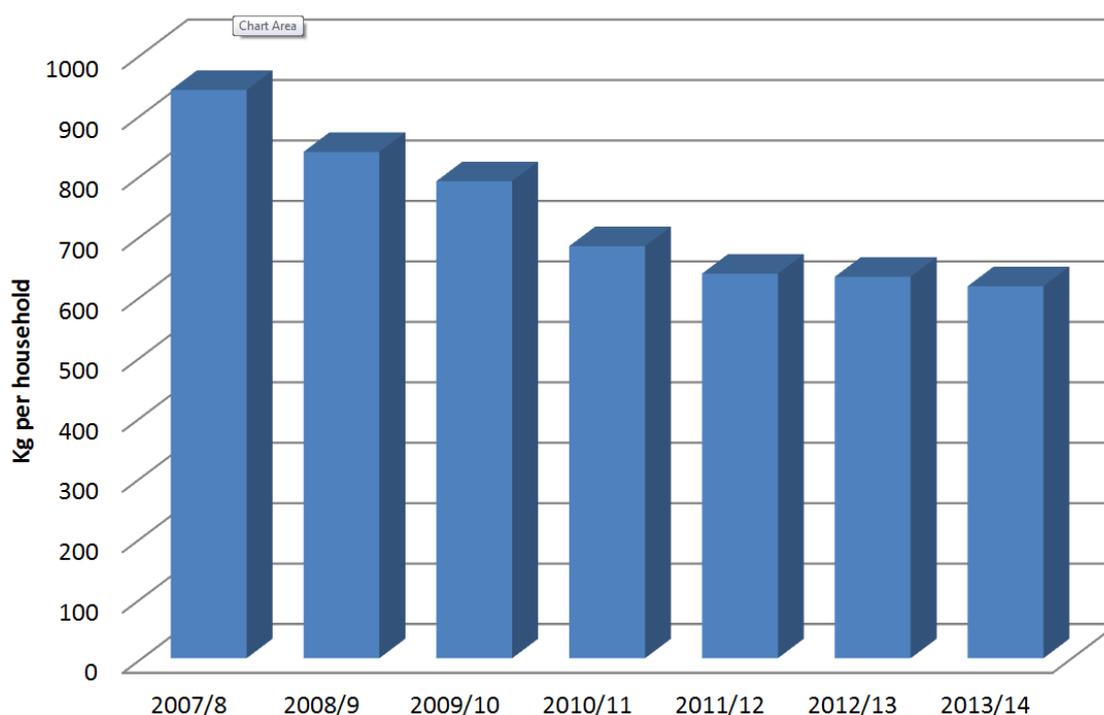
www.recycleformerseysideandhalton.com

3.6 The Merseyside and Halton Waste Partnership directly support community groups in the delivery of waste prevention and re-use initiatives through the MRWA Community Fund. For example, in 2014 more than a dozen community projects that are working to cut food waste, and recycle or reuse everything from textiles to furniture have been selected to spearhead a £180,000 initiative across Merseyside and Halton.

3.7 In Halton, a project which gives young people the skills to transform unwanted furniture for needy residents received a £9,700 grant for 2014/15. The project in Widnes called 'Project Up', involves 'upcycling' items by the newly-skilled volunteers which have so far been donated to residents in need. The project aims to replicate Project Up's success on the Wirral, where 80 per cent of young people taking part went on to find employment.

3.8 The Council's waste prevention and reduction initiatives have been successful in helping to reduce the overall amount of waste produced per household. Graph 1 overleaf showing the reducing levels of waste produced per household.

Graph 1 – Household Waste Kg of Waste per Household



Recycling

3.7 As highlighted above the Council provides two primary methods of household waste recycling collection which are supported by communication and direct community engagement with Halton's residents to help them to recycle as much of their waste as possible:-

- a) Green garden waste collections – this material is composted (open windrow) by Veolia Environmental Services Ltd under the Waste Management and Recycling Contract; and
- b) Co-mingled recycling collections – this material is processed via a MRF that is operated by Veolia Environmental Services Ltd, also under the Waste Management and Recycling Contract.

3.8 The services that the Council provides are delivering a forecast household waste recycling performance for 2014/15 of over 40% whilst remaining aligned with our commitment to maximising financial and environmental benefits from the Council's waste collection operations and the MRWA contracts for waste treatment. This approach has been formally approved by the Council and documents evidencing this are available on request. These include a legally binding Inter Authority agreement between MRWA and Halton.

- 3.9 The Council directly takes its co-mingled collected recycling material to the MRWA MRF at Gillmoss, Liverpool for processing into separate material streams for onward recycling. In order to ensure that the best quality material is supplied to the MRF as possible the refuse collection vehicles operate low compaction to ensure that the payload is not excessively compressed and is therefore presented in line with the MRF contract input specification and acceptance criteria
- 3.10 The Council engages with the public to ensure minimal contamination of the co-mingled recycling stream through a range of measures including published recycling guidance, recycling promotional campaigns using outdoor media (including advertising on waste collection vehicles), website material direct community engagement / door-stepping through a community engagement officers, and implementation of the Council's waste collection policy (available on request).
- 3.11 Therefore the input of co-mingled material by the Council to the MRF is of good quality and this outcome is evidenced through the relatively low proportion of such material that is rejected due to contamination / presence of non-target material (as highlighted in Table 3)
- 3.12 As stated above the MRWA and Halton contractor, Veolia Environmental Services Ltd, operate the MRF. They operate the facility in accordance with the Material Recycling Facility Code of Practice and data in respect to the associated sampling regime will be available from January 2015. Current sampling of output material demonstrates that a good quality material is being produced by the MRF, this illustrated in Table 3 below.

Table 5: Gillmoss MRF Output Material Quality			
Sold As	% Of Ouput	Purity of Output	Recycled %
News & Pams	5.84%	98.01%	100%
Mixed Paper	38.09%	94.02%	100%
Card	5.86%	98.11%	100%
Small Glass	23.84%	91.66%	100%
Aluminium	1.00%	92.39%	100%
Steel	3.70%	88.46%	100%
Mixed Plastics	8.07%	85.50%	100%
Total	100.00%		

Table 5 illustrates that the current MRF sorting arrangements result in 100% recycling of waste paper, metal, plastic and glass with high purity rates of between 85.50% and 98.11%.

Furthermore, Veolia are able to secure a reasonable price from the recycling processing industry for the MRF output material in line with the price ranges illustrated in the monthly WRAP / MRF Material Pricing Report.

Material Reprocessing

Current reprocessor destinations for key materials from MRF outputs are shown in Table 4 below (NB: reprocessors are subject to change).

Table 4	Recyclable Materials Reprocessor Destinations
Glass	Recresco Ltd, Lane End, Urban Road, Kirkby-in-Ashfield, Notts, NG17 8LP
Metal	Morris & Co.(Handlers) Ltd, Bankwood Lane Industrial Estate, Roseington, Doncaster, DN11 0PS O'Connell Metal Recycling Alutrade Can Recycling Ltd, Langley Forge House, Tat Bank Road, Oldbury, West Midlands, B69 4NH
Paper	JHS Recycling Mark Lyndon Paper Enterprises (UK) Limited, NG2 Business Park, 12 The Triangle, Nottingham, NG2 1AE UPM - Kymmene (UK) Ltd, Shotton Paper, Weighbridge Road, Shotton, Deeside, Flintshire, CH5 2LL
Plastics	Closed Loop Recycling Eco Plastics Ltd, Hemswell Business Park, Hemswell, Lincolnshire, DN21 5TU

Energy Recovery

- 3.13 In December 2013 the MRWA announced that it had completed its procurement for a 30-year waste Resource Recovery Contract (RRC) on behalf of the Merseyside and Halton Waste Partnership. The Financial Close of the contract will bring more than £100M worth of savings to the Authority and its partner Councils over current landfill costs and over the life of the contract. MRWA has signed contracts with a consortium led by SITA UK for the Contract worth more than £1billion.
- 3.14 The winning bid from the SITA UK-led group includes a high efficiency Energy from Waste facility with Combined Heat and Power at the Wilton International site in Teesside creating around 50 new permanent jobs, and a new rail hub for the transportation of waste at the existing Potter Group Rail Freight Terminal at Kirkby in Knowsley on Merseyside, creating around 25 new permanent jobs.

- 3.15 The energy-from-waste facility will also be able to provide heat to local businesses, with the capacity to deliver 190 tonnes of steam an hour to neighbouring industrial businesses via a district heating system. This solution will enable the Merseyside and Halton Waste Partnership to divert more than 92% of its residual waste from landfill, while also generating the equivalent electricity to power thousands of homes. Managing the waste material in this way will result in CO2 reduction of approximately 127,335 tonnes a year – compared with landfill disposal and, by using rail haulage, will effectively remove the equivalent of 21,000 HGV journeys per year off the roads.
- 3.16 The announcement is the final stage of a resource management project which will provide a sustainable and cost effective solution for 430,000 tonnes of municipal waste per year, which the MRWA handles and which has not been recycled.
- 3.19 The MRWA will now work with SITA UK and the other partners to implement the contract and start the development and construction of facilities in both Knowsley and Teesside. The Wilton Energy from Waste plant is expected to take two years to build and the contract is expected to start handling waste in 2017, with the rail terminal development in Kirkby starting in 2015.
- 3.20 In the interim period (up to 2017, and the commencement of the RRC), a Residual Waste Treatment Services Contract has been procured by the Council in order to secure services to:
- ensure that sufficient interim capacity is available to Halton,
 - to minimise transport costs and,
 - to maximise landfill diversion

WSR Recycling Ltd was awarded a 2 year contract in 2013 which has options to extend up to the start of the RRC. Under the contract, Halton's residual waste is delivered to an Energy from Waste facility.

Disposal

- 3.21 The interim arrangements secured by Halton and the RRC will provide a sustainable and affordable solution for the management of the current 430,000 tonnes of municipal waste that Merseyside and Halton have previously sent to landfill.

4. ROUTE MAP STEP 3: APPLY THE WASTE HIERARCHY

- 4.1 The information provided above for Steps 1 and 2 evidences the Partnership's and the Council's approach to managing municipal waste against the Waste Hierarchy's priorities. In the current context of public sector austerity whilst recognising the financial, economic development and environmental benefits of taking steps to move further up the Hierarchy, the approach described is deemed to be compliant with the Hierarchy's requirements and the measures taken to comply are "reasonable in the circumstances".
- 4.2 Thus the direct actions of the Council, extended through the activity of the wider Partnership, do meet the requirements of Regulation 12 of the Waste England and Wales Regulations 2011 in respect to its requirement to apply the Waste Hierarchy.

5. ROUTE MAP STEP 4: DECIDE WHETHER SEPARATE COLLECTION OF THE FOUR MATERIALS IS REQUIRED

- 5.1 The Council provides a co-mingled household waste recycling service to Halton's residents. This includes the collection of glass, metal, paper and plastic together for processing at a MRF into separate commodities that can be subsequently recycled in their own right as part of a closed-loop recycling system that meets the necessary quality standards for the relevant recycling sectors.
- 5.2 This co-mingled method of recycling provides the following outputs:-
- a) A simple and easy to use system for residents;
 - b) Increasing levels of recycling since 2007, with a high level of recycling performance of over 40% projected for 2014/15;
 - c) Good quality input material for MRF processing;
 - d) Good quality MRF output materials that meet re-processor market standards, for subsequent recycling within a closed-loop recycling system;
 - e) An essential financial return on the significant investment the MRWA has made in the provision of two MRF's to support the delivery of the Halton's household waste recycling operations;
 - f) An important step, within a range of measures, to manage household waste as far up the Waste Hierarchy as possible; and
 - g) Reasonable performance is being achieved for reasonable cost.
- 5.3 **Given the outputs set out in paragraph 5.2, it is deemed that separate collections of glass, metal, paper and plastic is not necessary to ensure that waste is recycled and to facilitate improved recovery as identified by Regulation 13 of the Waste England and Wales Regulations 2011.**

Practicability Tests

- 5.4 Given that the Council has deemed that separate collections of glass, metal, paper and plastic is not necessary, it determined that it was not necessary to fully apply the Practicability Test of the Route Map to the four waste streams identified. Notwithstanding this, the Council did also consider the following points:

Based on statistics provided by WRAP for 2013/14, 50% of Local Authorities in England operated a co-mingled kerbside dry recycling service; 29% operated a separate collection system for more than one material, and 34% operated a separate collection system for one material only. It is clear therefore that it is technically practical to separately collect each material because separate collections have been demonstrated and operated by other Local authorities, including St Helens within the Merseyside and Halton Waste Partnership.

However, the Council needs to consider:

- Halton's local circumstances
- Previous investment in promoting a user friendly recycling collection
- The impact of deviating from the requirements of the Waste Management and Recycling Contract
- The impact of any changes in collection routes and optimisation
- Carbon emissions for the service
- The considerable investment that would be needed to restructure services and change public education/engagement
- The significant investment that the Council and the MRWA has made in recent years to implement co-mingled recycling collections alongside the un-viable cost implications of ceasing this arrangement

Commercial Waste

- 5.5 The Council collects waste from commercial premises upon request. The total amount of commercial waste collected annually is circa 1,180 tonnes, which represents only 3% of the total waste/recyclable materials collected from households and businesses across the borough. An economic assessment has determined that there would be a significant additional cost incurred to separately collect paper, glass, plastics and metals from the Council's commercial waste customers; which is not economically practical. Increased costs are primarily associated with providing additional waste receptacles as well as additional/multiple waste collection vehicle movements per day. Given Council budget pressures these additional annual costs may not be considered reasonable. Notwithstanding this, the additional collection costs would need to be passed onto the customers which may have a negative impact on the Council's ability to provide a competitive collection service in the future.

6. ROUTE MAP STEP 5: OBTAIN SIGN-OFF

- 6.1 The Merseyside and Halton Waste Partnership's Senior Officer Working Group has acted as a peer review group in the Council's assessment of its waste collection operations against the requirements of the Regulations.
- 6.2 The outcome of this assessment will be presented to the Council's Executive Board for formal approval. The recommendations to the Council's Executive Board will be made in consultation with the Council's Portfolio Holder for Environmental Services, the Operational Director for Legal & Democratic Services and the Divisional Manager for Waste and Environmental Improvement Services.

7. ROUTE MAP STEP 6: RETAIN EVIDENCE

- 7.1 The Council will maintain evidence generated by the previous steps in order to support the rationale for its decision on separate collection.

8. ROUTE MAP STEP 8: REVIEW PROCESS

- 8.1 In order to ensure continuing compliance with the Regulations, the Council will re-evaluate its position on the separate collection of paper, glass, plastics and metals every 3 years. The Council will re-evaluate its co-mingled collection methodology prior to any scheduled review should there be any significant change which may affect its position. Such factors may include, but are not limited to;
 - Contractual changes
 - Availability of recycling facilities / new technologies
 - Changes in recyclate value
 - Changes in waste composition
 - Changes in staff, vehicle, fuel, waste management costs