



Implications of the Waste Strategy for Local Authorities inquiry

About the DCN

The District Councils' Network (DCN) is a cross-party member led network of 191 district councils. We are a Special Interest Group of the Local Government Association (LGA), and provide a single voice for all district councils within the Local Government Association.

District councils in England deliver 86 out of 137 essential local government services to over 22 million people - 40% of the population - and cover 68% of the country by area. District councils have a proven track record of building better lives and stronger economies in the areas that they serve. Districts protect and enhance quality of life by safeguarding our environment, promoting public health and leisure, whilst creating attractive places to live, raise families and build a stronger economy.

As the collection authorities the Resources and Waste Strategy will have a significant impact on district councils and we welcome this opportunity to respond to this inquiry.

District councils are committed to increasing recycling rates and have a good record of showing their commitment as evidenced by:

- All of our members offer a kerbside dry recycling collection
- Districts represent two-thirds of the top 100 authorities for recycling rates
- Nearly 50% of all districts collect food for recycling.

Whilst we agree with the principles of the Resources and Waste Strategy, the DCN have concerns with regards to some contradictory ambitions, for example providing a free garden waste collection service to every household discourages people from home composting, which is far better environmentally. It should also be noted that those districts who provide an opt-in garden waste collection service, have seen a decrease in their residual waste tonnages, therefore we have reservations regarding the argument that a chargeable service encourages residents to put garden waste into their residual waste bins.

We also have reservations regarding the introduction of standardised bins which will see the manufacture of millions of plastic receptacles and will see the redundancy of millions of already produced plastic receptacles, which are difficult to recycle. Whilst the strategy is striving to help create a cleaner, greener, healthier planet, which districts already prioritise, we are concerned that some of the proposals appear counter-intuitive to the strategy's overall ambitions.

Initial comments

What the financial implications are for local authorities of the Government's Waste Strategy.

We cannot be fully certain of the financial implications to councils as we cannot be assured of the detail used to inform the impact assessments. If individual authorities are allowed to see the data profiles used we can ascertain if all allowances have been considered and that the forecasts and proposed funding would be sufficient to roll out any change in services.

We have significant concerns regarding the limitations of the funding in its longevity and, whilst the strategy stipulates the provision of *'both net up front transition costs and net ongoing operational costs'* we ask that funding is guaranteed in its perpetuity. As the majority of funding appears to be coming from the EPR scheme, we have concerns regarding the long term viability of this as it's reliant on manufacturers agreeing to the scheme but also, if waste output decreases over time and there are less materials to be funded by manufacturers, districts will not see a reduction in the collection services required, as each property will still require a collection regardless of the amount put out, yet there could be less money from the industry to sustain these services.

Districts' main concern of the strategy is the introduction of mandatory garden waste collections for every household which will see a significant financial loss to districts. The additional cost for collection authorities to provide this service would range up to £1m per annum and there would be significant financial loss to those authorities who currently charge, with an anticipated net loss ranging up to £1.5m per annum. The expected savings to be made from removing the garden waste from the residual waste stream, therefore reducing the disposal costs, would not be realised by the collection authorities, and so districts would be providing an additional service, losing an income stream, yet would not receive any of the financial gain.

The proposal stipulates that the fortnightly collection should only be provided for growing season and therefore it is expected that funding would be provided for this period only, however councils will still have staff and vehicles for the out of season months which the funding would not cover, this would put a strain on authorities to finance this. Whilst staff can be utilised on other service areas during this period, councils will not have the funding to continue paying their wages, therefore there is potential for government to encourage seasonal contracts which will see staff potentially having to access other government service for 3 months, for example jobseekers allowance, if they are out of work for this period each year.

With regards to the receptacle standardisation and weekly food recycling proposals, whilst we have been promised upfront and ongoing funding we have no information to confirm if the profiles include costs of replacement receptacles and vehicle provision, maintenance, repairs and replacements, in its perpetuity, we are also unaware if the administration of distributing caddy liners has been taken into account. To bring in such big service change would require significant administration including route optimisation, utilisation of staff to deliver large scale roll-out,

communications materials to ensure residents are fully informed and continuation of this information to address any issues that arise following. This would also see significant burdens on other council services including customer services for customer queries or environmental enforcement for misuse which could lead to waste accumulation, therefore the funding must make allowances for all knock on effects of the strategy to other services delivered by districts.

What the likely effects will be on the recycling rates of local authorities.

If multi-stream dry mixed recycling is introduced there is a potential to see a decrease in recycling rates. By introducing the proposal of separate collections of materials, this could see a reduction in participation as a more complicated scheme, which requires residents to separate materials and enforces additional receptacles to do so, could deter residents.

There appears to be less focus on waste minimisation which, if in compliance with the waste hierarchy, would be the first choice for focusing efforts and would be a far better figure to aim for over increased recycling rates. As we have seen recycling rates stagnate nationally and decrease over time and the materials for focused efforts weigh very little, for example plastics and cartons, it is difficult to anticipate a drastic increase in dry recycling rates based on the proposal of the introduction of a core set of materials. As districts we have seen our recycling rates consistently remain high, with districts making up two thirds of the top 100 authorities for their recycling rates so if these authorities are asked to change their current collection systems in order to adopt a nationally consistent approach, there is potential for their recycling rates to drop if they introduce a system that residents do not wish to use.

We have significant reservations regarding the statement which outlines *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*. The DCN seek clarification on this point as the wording has generated different interpretation. If the strategy is to preclude any residual waste collections going to three or four weekly in the future, we envision this restriction will negatively impact the objectives of increasing recycling rates. We have seen three weekly collections successfully implemented in some areas, with reduced collections encouraging participation in kerbside recycling schemes, so to remove the option to reduce frequency of residual waste in the future seems counterintuitive to government's ambitions and we ask this guidance not be mandated and districts be allowed the freedom and flexibilities to deliver a collection service suited to the needs of their residents.

We have reservations regarding the argument that chargeable garden waste collection increases organic waste in the residual waste stream which cannot be absolutely proven as 57% of our members provide a chargeable garden waste collection scheme yet their accumulative residual waste tonnages have decreased

since 2014/15 ¹ we therefore ask government to allow us to see the compositional analysis used to support this argument. As the strategy consistently refers to the waste hierarchy we reiterate the counter-productive means of introducing statutory garden waste collections as it could discourage home composting which sees garden waste reused, which is the preferred method of disposal as per the waste hierarchy, and is more environmentally practicable than providing a kerbside service.

How provisions in the strategy may affect existing contracts for waste collection and disposal.

As collection authorities we do not determine the materials that we can and cannot collect. Our target and non-target materials are set by the individual facilities and these materials vary by company and are dependent on end-markets. The proposal then to introduce a core set of materials, mandatory garden waste and separate food waste would require significant changes which would require the industry as a whole to adopt and collection authorities cannot be expected to comply with the strategy if the infrastructure is not ready to accept the changes.

There are different contracts per waste stream and per authority. There are some councils who have their own recycling contracts but share a waste disposal contract, there are some that have a recycling contract which is shared with an authority outside of their county. Some partnerships have a shared contract for all waste streams but individual authorities will have various elements within this to accommodate the needs of their districts. Contract timescales vary with some up for renewal within the next 2 years and some grouped into longer term contracts for 10 years and above. To accommodate the changes would involve significant work to change contracts with potential fees to change them or leave them early.

We would strongly call on Government not to impose penalties on those authorities who require renewal of their contracts within the next 3 years and choose to continue with a scheme that does not match the proposal set out in the strategy. Councils should be allowed the flexibility and the time to adopt any changes at later contract renewal dates without the pressure to change their services within the contract period.

Should waste services be standardised across England or should there continue to be flexibilities for local authorities.

As district councils we deliver a service that is shaped and designed for our residents' needs, for our individual geography and within the parameters of our service availability. One of the biggest concerns of introducing a standardised service are the provisions required to deliver it and the varying property make up

¹ <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

across the nation. The DCN do not believe that having a standard set of receptacles is appropriate for blanket roll-out due to the mix of property types, for example, terraced properties with limited storage space and, in some cases restrictive access, would not be able to store or present numerous bins for collection and, in these circumstances, recycling boxes are a far more viable option, whereas a detached property, with more space and easy access to the public highway would be able to store and utilise a number of wheeled bins. We know that residents have strong views on the amount of bins they are expected to utilise and we cannot enforce a scheme which will not be accepted by residents, it also seems counter-intuitive to fund the mass production of millions of plastic bins and, in doing so, make current plastic bins and boxes, which are difficult to recycle, obsolete. This does not seem in keeping with the objectives of this ambitious environmental strategy.

District councils do not have a statutory duty to provide a garden waste collection scheme and this should not be mandated. Through a chargeable garden waste collection system, this allows residents to opt in to a scheme as a proportion of every single district do not require a garden waste collection system due to living in shared accommodation or in a property with no garden, therefore mandating a fortnightly collection, which will see a vast majority of residents subsidising a scheme they cannot receive, is not viable, it also dissuades residents from home composting which is a far more environmentally preferred means of disposal of garden waste.

A standardised service requires the infrastructure of the varying disposal facilities for all waste streams to be in compliance. As collection authorities we are bound by the target and non-target materials set by reprocessors and can only collect materials set by them as per our contracts, the sector varies in what will and will not be accepted and districts must not be expected to travel further or passed other facilities if they do not accept the materials set out in the strategy. This could see the incurrance of additional costs which we do not know if allowances have been made for within the impact assessments.

The DCN ask that efforts are made to ensure the infrastructure be standardised first before changes are enforced on collection authorities who are in the middle of an end to end process. We also ask that local consultation be the driver for the implementation of service change and that districts must be allowed the flexibilities and freedoms to deliver a service that works for their residents and not be expected to roll out a blanket scheme.

What the opportunities are for closer joint-working between authorities, particularly in two-tier areas.

Districts already work in partnership with over 80% of our members involved in a waste partnership in some capacity. One of the strains on relationships between collection and disposal authorities is regarding the sharing of cost savings as these are mostly achieved through the work of collection authorities encouraging increase in waste collected for recycling, yet the savings on waste disposal costs are realised by the disposal authorities. Whilst recycling credits are still distributed in some

authorities, these have been stopped for a significant number of members or have been reduced in some capacity for others. An opportunity to improve joint-working is by ensuring the funding for collection costs be delivered directly to the collection authorities, therefore removing the bureaucratic step of having disposal authorities distribute funding.