

## Department for Environment, Food and Rural Affairs

### Consultation on Consistency in Household and Business Recycling Collections in England

#### Background to CIWEM

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. The Institution provides independent commentary on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

CIWEM welcomes the opportunity to respond to DEFRA on its consultation on consistency in household and business recycling collections in the England. This response has been compiled with the assistance of members from our Waste Management Specialist Panel.

#### Response to consultation questions

We welcome the opportunity to respond to this consultation. We do not have detailed comments on the questions posed, but would make the following comments:

Recycling rates in England have stagnated at around 45%, despite the Government's target of 50% by 2020. It has become increasingly confusing for householders to determine what can and can't be recycled in their area, even though the majority of people want to recycle their waste appropriately. Increased recycling rates will not be achievable without long-term policy commitments to ease confusion and simplify the system in order to encourage householders and businesses to recycle.

The National Infrastructure Assessment, published in July 2018, identified a need for a consistent national standard of waste recycling from households and businesses and recommended that this should be put in place by 2025<sup>1</sup>.

We support consistent collections in household and business recycling collections across Local Authorities in England. It is imperative that Local Authorities are appropriately resourced to manage this and should not be expected to shoulder the burden of managing household and business waste without adequate funding.

Consistent collections and minimum standards across England would stimulate a stable market for recovered materials and give confidence to industry to invest in reprocessing infrastructure, due to confidence in the availability of high-quality materials. Consistent collections also required consistent sorting and treatment infrastructure. Shrinking export

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<sup>1</sup> National Infrastructure Commission. July 2018. [National Infrastructure Assessment](#).

markets for recyclates also means that we must increase our domestic reprocessing capabilities in order to manage our waste responsibly. It should be noted that recycling is not always the most desired option in terms of resource efficiency, and sits further down the waste hierarchy than re-use, and this should be encouraged wherever possible.

We support the proposed core set of dry materials of glass bottles and containers; paper and card; plastic bottles; detergent, shampoo and cleaning products; plastic pots tubs and trays; and steel and aluminium tins and cans, to be collected by all local authorities in England. We strongly support the list being expanded over time as new evidence and technology emerges. The introduction of minimum standards for Local Authorities are appropriate, and would support any ambition over and above this.

We support mandatory food waste collections for anaerobic digestion processing, to reduce the amount of food waste going to landfill and increase green gas production. However, more work needs to be done on the most appropriate method for food waste collections in high density urban areas. The first-choice solution for managing garden waste should be at home composting and this should be included in a public engagement strategy. Collection of food waste with garden waste is problematic because it cannot be sorted and digested through AD.

Weight-based targets for waste collections are often not the most appropriate measurement despite being the most common. It can lead to an unintentional focus on recycling less resource intensive materials, and a focus on heavier materials such as garden waste. A carbon-based system of metrics would incentivise the recycling (and re-use) of those items which are the most carbon intensive to produce, process and dispose of, and are often not the materials which weigh the most.

Separate multi-stream collections are the most cost effective in the long-term. Co-mingled collections are most preferred by householders, as they are the simplest option to do at home. However, a well-planned public engagement and education programme would be effective in communicating why multi-stream separate collections are necessary. Clear and compelling communications is key to get the public engaged.

Clearer labelling is essential to reduce contamination. As outlined in our response to Defra's plastic packaging consultation, we support the introduction of mandatory uniform labelling.

Long-term policy commitments are essential to stimulate the domestic reprocessing industry and give confidence of being able to source quality recyclates and invest in new infrastructure, coupled with clear, consistent communication to the public to improve materials collected. Consistent collections and minimum standards across England would help to achieve the 65% recycling target from the Resources and Waste Strategy.