

# **Appendix 1 - Policy Review 2022-2023**

## **Household Waste Management Strategy Update**

### **1. Overview**

The annual Household Waste Management Strategy Policy Review considers the regulatory and policy framework within which the strategy is delivered.

Changes in national policy and legislation as well as local policy can fundamentally affect the overarching principles within the strategy and the council's ability to deliver on actions which meet the aims.

At a national level, waste management policy is undergoing a period of unprecedented change primarily with the introduction of the Environment Act 2021. Whilst there are still gaps in the detail of how the Act will affect local authorities and the wider industry, this policy review will set out the known impacts and anticipated timescales for change.

### **2. National policy and legislation**

#### **2.1 Environment Act 2021**

The Environment Act, which became law in 2021, acts as the UK's new framework of environmental protection and aims to improve air and water quality, protect wildlife, increase recycling, and reduce plastic waste.

DEFRA undertook a second round of public consultations on three key waste-focused elements of the Act in May/June 2021; however, they are yet to publish the outcomes of two of these three consultations. This potentially means that many of the already ambitious timescales referenced in the consultations will also be delayed, or councils may be provided with even less time to make the significant contractual and operational changes to meet the requirements of the Act. A summary of the anticipated timescales for the Act is shown below in Figure 1.

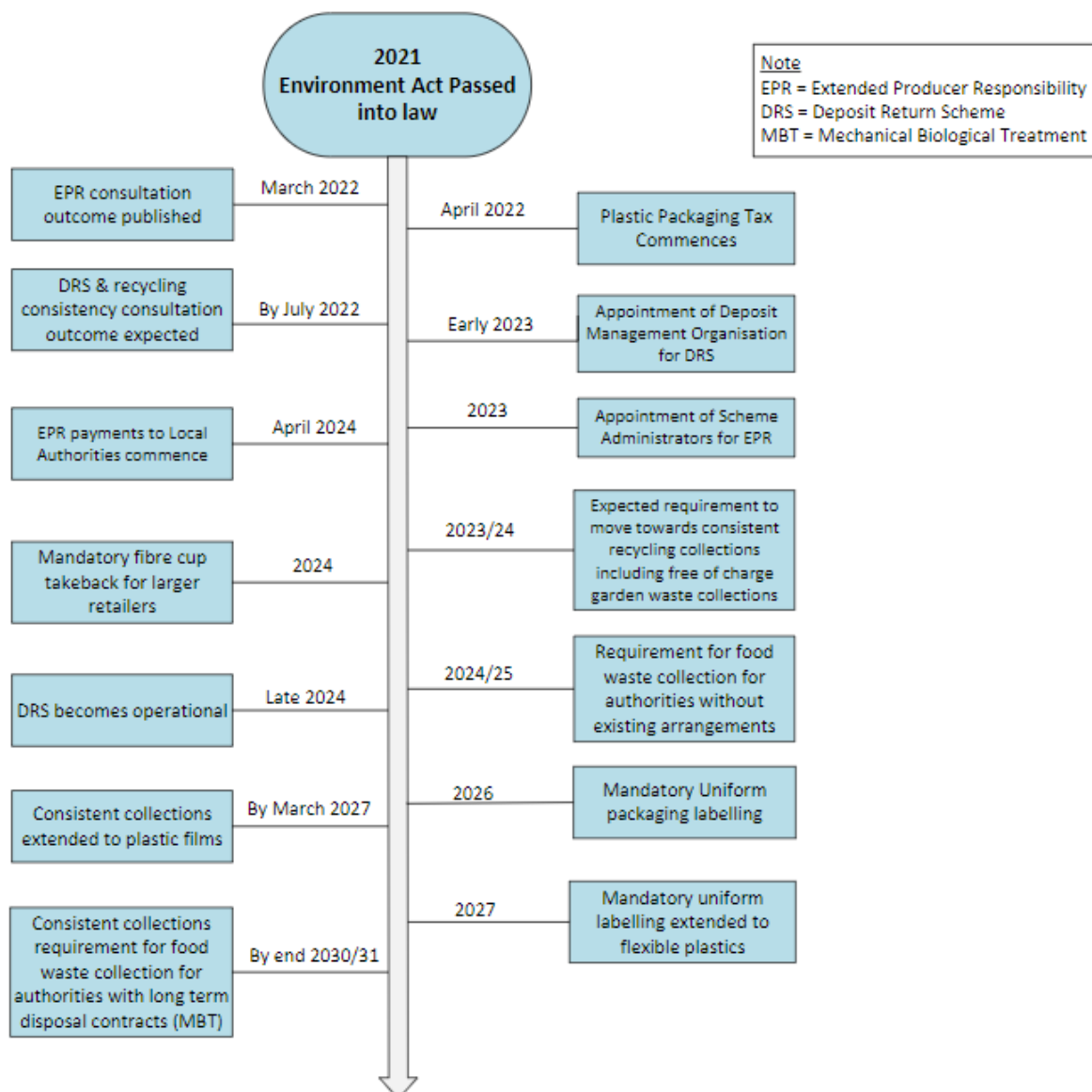


Figure 1. Estimated timescales for The Environment Act 2021

The key waste-related proposals contained in the Environment Act are summarised below:

**Plastic Packaging Tax** (*This was brought forward ahead of the Environment Bill and is actively progressing. It takes effect from 1 April 2022*). It:

- Applies to plastic packaging manufactured in, or imported into, the UK that does not contain at least 30% recycled plastic content. Plastic packaging is packaging that is predominantly plastic by weight. Also applies to bio-degradable plastic packaging containing <30% recycled content.
- All businesses that manufacture or import 10 or more tonnes of plastic packaging over a 12-month period will need to register for the tax, regardless of whether they need to pay any tax.

*Anticipated impacts and outcomes:*

- Expected to further incentivise the recovery of post-consumer plastic for recycling, increase demand for this material and reduce the use of plastic packaging with little or no recyclable content.

- Expected to positively influence the revenue achieved from sales of plastic commodity streams.
- May result in more alternative, easily recyclable, packaging being placed onto the market.

**Deposit Return Scheme (DRS)** (Implementation date to be confirmed, but consultations suggest this could be 2024)

- “All in” scheme which will apply to all drink containers up to 3 litres which are made of PET plastic or metal cans. A small refundable deposit (@ 20p) would be payable on each item in scope.
- Significant UK infrastructure requirement: new national network of Reverse Vending Machines and retailer Return Points required.
- New DRS administration body to be set up to implement and oversee.

*Anticipated impacts and outcomes:*

- Expected to increase the recycling of products in scope up to 90% after three years of implementation.
- Reduced local authority costs associated with collection and disposal of litter (still to be quantified).
- Significant risk of reduced material income to the council as some material that would once have been placed out for kerbside collection would go via the DRS route instead. Both PET bottles and aluminium cans are high value materials which contribute significantly to current recycling income
- Reverse Vending Machines expected to become an additional feature of “street furniture” in the local environment.

**Extended Producer Responsibility (EPR)** (*Commencement from April 2024*)

- ‘Brand owners’ are to be defined as the packaging producers for this legislation.
- All producers of packaging to be made accountable for covering the full cost of the recovery and recycling of their products.
- EPR is estimated to facilitate an overall England recycling rate for packaging of 73% by 2030.
- Producers will pay fees based on material type and volume to a national compliance scheme.
- Aims to encourage better packaging design, phasing out unnecessary packaging and incentivising producers to develop packaging which is easier to recycle or that can be reused.
- Councils will have the opportunity to recover costs of collection and recycling/ disposal of packaging materials collected as part of kerbside services or within street litter bins.
- Introduces the requirement for mandatory uniform recyclability labelling on packaging to provide consumer with clarity of what can and cannot be recycled.
- Introduces mandatory retailer takeback of single-use fibre cups to tackle litter and move the responsibility for recycling these difficult-to-recycle materials to those placing them on the market.

*Anticipated impacts and outcomes:*

- Significant changes in the composition of residual waste, and a reduction in kerbside collected residual waste collected and disposed of by the council.
- Opportunities to collect and recycle more packaging waste as sustainable markets are created.

- Expectation to expand kerbside collections to include plastic film and flexible plastics, from 2026/27, although this relies on rapid development of recycling capacity and technology.
- Opportunity to receive funding from the EPR compliance scheme to cover collection and recycling/ disposal costs in respect of in-scope packaging materials.

**Consistency in recycling collections** (proposed from 2023 but still to be confirmed. The government's Net Zero Strategy contains references to mandating councils to collect food waste from 2025):

- Weekly separate collections of food waste expected to be mandated.
- Fortnightly free of charge collections of garden waste expected to be mandated in larger containers than are currently supplied in Wiltshire.
- Collections of four key dry recyclable materials (plastic, paper & card, glass and metals) to be mandated. These materials should be collected separately from each other unless it is not technically, or economically practicable or separate collections present no significant environmental benefit.
- Recycling collections to be expanded to include plastic films and flexible plastics possibly from 2026/27.
- Increased recycling of business waste expected to be mandated.

*Anticipated impacts and outcomes:*

- Government have indicated that the "full net additional costs" incurred by those councils needing to put new collection services in place would be met. If this is not the case, service delivery costs will increase.
- In Wiltshire, a net increase in collection vehicles will be required, particularly in respect of free garden waste and weekly food waste collections, resulting in higher collection costs and greater vehicle fleet CO2 emissions.
- A significant change in the composition of our residual waste (e.g. removing most bio-degradable putrescible waste) may mean that the waste input specifications for the Landfill Diversion Contracts cannot be met.
- Potential requirement to further separate materials for recycling at the point of collection (kerbside). May require a fundamental review of current collection methods for kerbside collected dry recycling.
- New collections for plastic films and 'flexibles' need to be put in place, as well as sourcing the associated recycling outlets
- The council may need to recommence collections of waste and recycling from commercial businesses. These collections are currently performed by Hills under the Council's Lot 5 waste collection contract.

## 2.2 POPs

Persistent Organic Pollutants (POPs), particularly in the form of Decabromodiphenyl ether (decaBDE), are of environmental concern and their use in manufacture was banned throughout the EU in 2004 under the Stockholm Convention. Restrictions on POPs are based on the European regulation on persistent organic pollutants, which is implemented in the UK by the Persistent Organic Pollutants Regulations 2007.

POPs are found in waterproofing and flame retardant chemicals commonly used in Domestic Seating and Soft Furnishings (DSSF). Under the regulations, DSSF containing POPs must be disposed of via incineration rather than landfill.

Enforcement notices from the Environment Agency and detailed guidance from DEFRA is expected to be sent to local authorities towards the end of 2022.

The council currently sends all bulky household waste collected at the kerbside or through its network of household recycling centres, including DSSF, to landfill therefore it is expected that the council will need to divert this waste to incineration to comply with the guidance and any enforcement notices that may be received. The council will need to make alternative arrangements with its contractors to manage this waste in accordance with the guidance and regulations, and which is likely to involve significant additional costs associated with the identification, preparation and separate collection of this waste before it can be incinerated.

### **2.3 Emerging policy changes and consultations**

There are several potential policy changes which are being consulted on which affect the council's Household Waste Management Strategy. These include:

- **DEFRA Consultation on preventing charges for DIY waste at household waste recycling centres and call for evidence on booking systems at household waste recycling centres** - The consultation closed on 4 July 2022. It is seeking views on construction waste being treated as DIY waste in certain circumstances and therefore being classed as household waste, enabling it to be disposed of free of charge. The consultation also considers the impacts of booking systems at household waste recycling centres.
- **DEFRA Consultation on the Reform of the waste carrier, broker and dealer (CBD) registration system for England:** Consultation closed in April 2022. In 2018, the Resources and Waste Strategy set out the Government's commitment to improve the transport, management, and description of waste by reforming regulations for duty of care, CBD, hazardous waste and international waste shipments.
- **DEFRA consultation on the implementation of mandatory digital waste tracking across the UK:** Consultation closed in April 2022. The introduction of mandatory digital waste tracking is supported by the powers in the Environment Act 2021. The consultation was seeking views on the practical aspects of implementation.
- **UK ETS Authority Consultation on Developing the UK Emissions Trading Scheme** – The consultation closed in June 2022. It is seeking input on a number of proposals to develop the UK Emissions Trading Scheme which is likely to impact on the council's Energy from Waste contracts and the proposals have the potential to increase pricing by up to 30%.
- **DEFRA Consultation on Environmental Targets – Consultation closed in June 2022.** The Environment Act 2021 requires the government to set at least one long-term target in each of the following areas: air quality; water; biodiversity; and resource efficiency and waste reduction. It also requires targets to be set for fine particulate matter and species abundance. The consultation proposes targets on waste management which are likely to become statutory once adopted.
- **DEFRA Consultation on reforms to the Packaging Waste Recycling Note (PRN) and Packaging Waste Export Recycling Note (PERN) System and Operator Approval.** Closed May 2022. Proposes improvements to verification processes that identify whether recyclers and exporters of waste material are legitimate, that material exported for recycling reaches the destination facility, and to reduce fraud and improve price transparency. This reform has become necessary since the Extended Producer Responsibility consultation outcome has identified that the scheme will work in tandem with this existing mechanism, rather than fully replace it, as was originally proposed. A high proportion of the council's recycling income comes from these PRNs and PERNs which evidence that material was recycled.

### 3. Local drivers

#### 3.1 Local Policy Drivers

##### 3.1.1 Wiltshire Council Business Plan (2022 to 2032)

The Council's new Business Plan was approved by Full Council on 15 February 2022. This business plan sets out our priorities and how we will deliver them working closely with local communities and partners; as well as investing in technology to make it easier for residents and businesses to engage with us and resolve matters more quickly.

As a council, we know our mission is to ensure:

- We take responsibility for the environment.
- The people of Wiltshire are empowered to live full, healthy and enriched lives.
- Our communities continue to be beautiful and exciting places to live.
- Our local economy thrives and is supported by a skilled workforce.
- We lead the way in how councils and counties mitigate the climate challenges ahead.

Our guiding themes are:

- Prevention and early intervention
- Improving social mobility and tackling inequalities
- Understanding communities
- Working together

Outcome 4 of the business plan focuses on Sustainable Environment. The plan aims to:

- Find and promote new opportunities for people and businesses to reuse and recycle.
- Reduce the amount of waste going to landfill, increase recycling and keep Wiltshire looking beautiful.

To achieve this, over the course of the Business Plan, the council shall implement:

- A review of all waste services in conjunction with residents and business, including all operational sites.
- A fit-for-purpose set of operational depots across Wiltshire.
- Delivery of new educational campaigns and pursue further prosecutions on fly tipping.

##### 3.1.2 Environment Service Plan (2021 to 2023)

To deliver the outcomes and aims of the Council's Business Plan, the Environment Directorate has developed a Service Plan to reflect activities undertaken within each of the services.

There are several activities that the waste services team are expected to deliver to contribute to the Environment Service Plan:

No.	Description	Business Plan Link
11	Review the current waste collection and waste management services to consider the near-term potential for service efficiencies to reduce carbon emissions and extending the range of materials collected for reuse and recycling. Work with residents, community and volunteering networks and	Responsibility for the Environment

	service providers to improve the quality of recycling material managed by the council in order to reduce the amount of waste sent to landfill.	
12	Develop a Future Waste Service Delivery Model to inform the review of the council's Household Waste Management Strategy and future procurements, ensuring the most effective and efficient delivery of new waste and recycling services and waste management solutions to maximise resource efficiency, further reduce carbon-emissions, and achieve zero avoidable waste to landfill.	Responsibility for the Environment
13	Review and identify the requirement for operational waste facilities including depots, Waste Transfer Stations and household recycling centres, in order to provide a set of "fit for purpose" sites suitable to facilitate the delivery of effective and efficient waste services in the long term.	Responsibility for the Environment

### 3.1.3 Climate Strategy

Wiltshire Council's Climate Strategy was adopted by full council in February 2022. The Strategy sets out the next five years of the council's journey to becoming a carbon neutral county, covering seven delivery themes: transport; built environment; waste; green economy; energy generation, storage and distribution; natural environment, food and farming; and carbon neutral council.

The strategy links with the Household Waste Management Strategy and sets out the following key objectives:

- Work towards a circular economy.
- Work towards zero avoidable waste in Wiltshire and decarbonising the waste management process.
- Manage waste in accordance with the waste hierarchy: reduce overall waste, increase the amount and quality of waste recycled and reduce the amount of waste sent to landfill

With the key areas of focus being:

- Continue to provide efficient recycling services and review the potential for expanding the range of items collected and maximising the efficiency of collections wherever possible
- Keep our Household Waste Management Strategy under review, reflecting carbon assessment of collection and disposal options, including the impact of processing waste locally or abroad, and recognising the requirements of the new Environment Act to potentially extend the scope of recycling collections, to include separated food waste.

### 3.2 Financial drivers

Wiltshire Council faces significant financial challenges over the coming two years due to an increased demand on key services and increasing costs linked to higher inflation. The council seeks to bridge a budget deficit of more than £25m while ensuring residents, businesses and communities still get access to vital and high-quality services.

At a Full Council meeting on 15 February 2022, Wiltshire Council members agreed to implement several changes across a wide range of its services to deliver the financial savings necessary to balance the budget, which includes several savings to the Waste Services budget which will need to be planned and implemented, including:

- An increase to the annual subscription charge for garden waste collections from £50 to £60 per bin
- An increase in the bulky waste collection charge from £25.30 to £28 per item
- Public consultation on the potential closure of Lower Compton HRC in 2023
- Introduction of charges for disposal of non-household wastes at HRCs
- Increase in projected income from sale of recyclates
- Sale of excess landfill diversion contract capacity
- Increase recycling rates in line with the Business Plan

### 3.3 Social drivers

#### 3.3.1 Wiltshire Council Area boards

Area Board arrangements have been amended following a review that was scrutinised by an Overview and Scrutiny (OS) Task Group. The process set out to improve the Area Board funding investment arrangements; support the boards, establish and effectively deliver to evidenced based local priorities; and increase the efficiency and consistency of working groups. The number of Area Boards, overall format, structure, and local autonomy were not part of the review. Area Boards are encouraged to create or re-constitute working groups to advance local priorities and increase collaborative working.

Area Boards will be asked to select up to five local priorities, which will be evidence led to ensure they have the greatest impact on the lives of those in our communities. Area Board resources including officer time, meetings, engagements, working groups and funding should be directed at furthering the objectives linked to the respective priorities.

Currently 10 of the 18 area boards have 'Waste and Recycling' as one of their top 3 priorities. Two of these area boards have 'Waste and Recycling' as their 1<sup>st</sup> priority.

Changes to Area Boards provides an opportunity to engage with communities to deliver key actions within the strategy.

#### 3.3.2 Changing demographics

Wiltshire's property growth over the next six years to 2025/26 is expected to increase by 4% to 234,713 households. The largest increases will be seen in the Salisbury, Chippenham, and Warminster areas.

Based on data provided by the Wiltshire Intelligence Network, as of 2021, Wiltshire's population aged 65 or over had increased by 1.6% over the previous three years, to represent just over one-fifth of the population. Life expectancy of this age group also increased 0.5% during the same period.

This shows we have a large and increasing aging population, and proportion of our population who have health limiting health conditions, and whom we need to make sure can access and use our services effectively.

#### 3.3.3 Meeting public needs and expectations

There is increasing media coverage of the impact of waste on the environment, which is reflected in resident's knowledge and awareness of the issues we are seeking to address.

Many communities are considering options to supplement council waste services with community led initiatives, such as local "Terracycle" collection points for 'hard to recycle' items that are sponsored and supported by the packaging industry and working to actively



promote waste prevention and good household waste management practice. The council is committed to supporting community led activity where possible, and the waste service will work with the Community Engagement teams to assess how this can be achieved most effectively.

The social message regarding the needs to increase recycling and reuse means that the public is increasingly applying pressure on local authorities to increase the range of items collected for recycling, including food waste and the council needs to consider how these fit into the Household Waste Management Strategy in the future, whilst addressing the changes in national and local policy.