



National Assembly for Wales Environment and Sustainability Inquiry into recycling in Wales

Submission by Natural Resources Wales

Summary

- Wales is the only UK country to have introduced statutory local authority recovery targets for waste recycling. Welsh local authorities collectively achieved the first target of 52 per cent in 2012-13.
- We are very supportive of the intent of Welsh Government proposals to reduce the amount of waste going to landfill, increase recycling, and improve the quality of recyclates; we responded positively to these proposals within the recent WG Environment Bill consultation.
- Natural Resources Wales has monitored the recycling service outcomes since 2004/05 through our statutory roles. With further significant legislative developments due to come into force later this year that will have an effect on the quality of the recycling services, it may be too early to fully assess the relative outcomes of the different types of local authority recycling service provision.
- The relative timing of the provision of detailed Welsh Government (WG) guidance and the necessary development of the recycling service has contributed to the position we see today in terms of significant variation in methods of service delivery.

1. Role of Natural Resources Wales

- 1.1 The purpose of Natural Resources Wales is to ensure that the natural resources of Wales are sustainably maintained, used and enhanced, now and in the future.
- 1.2 Natural Resources Wales is responsible for regulating the waste industry and is principal adviser to WG, adviser to industry and the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources.
- 1.3 Natural Resources Wales is the designated monitoring authority for The Recycling, Preparation for Reuse and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011 and Landfill Allowances Scheme (Wales) Regulations 2004. We validate local authority data on a quarterly basis performing a series of data quality checks. Our validation includes cross checks against WasteDataFlow and site return data for landfill, and requests for evidence from local authorities on the final fate of their recovered waste.
- 1.4 The purpose of the Landfill Allowances Scheme is to ensure that Welsh local authorities divert biodegradable municipal waste from landfill. Our measure of data accuracy is published annually in

the NRW Landfill Allowances Scheme Report¹. This includes reporting on the timeliness of data received from local authorities in accordance with reporting deadlines.

- 1.5 The Local Authority Recovery Targets place greater importance on Welsh local authorities to increase the recovery of materials collected and to accurately report data on intermediate sorting facilities, reject rates and end destinations. We work with local authorities to identify and report the end destinations of the waste that they collect, so that only materials actually recycled, prepared for re-use or composted are included in the calculation of their recovery rates. We validate the waste data returns submitted quarterly by Welsh local authorities. Following validation the data is published by StatsWales each quarter. In order for local authorities to meet the recovery targets, they are required to provide us with supporting evidence that their diverted waste has met the relevant criteria. We provide WG with a Local Authority Recovery Target Report which summarises additional validation work undertaken during a scheme year.
- 1.6 We also work with others to provide increased market confidence in the quality of products made from waste and so encourage greater recovery and recycling, for example through the development of quality protocols.
- 1.7 We are also the regulator for the recent changes to the regulatory framework in respect to Material Facilities (MFs). MF operators must notify us if they qualify for the new permit condition (self-assessment) and must start to report specific sampling information to us from 1st October 2014 for us to publish as part of our public register.

2. Current Situation

- 2.1 The total amount of local authority municipal waste in Wales, excluding abandoned vehicles, generated in Wales peaked at over 1.9 million tonnes in 2004-05. It has since been steadily reducing, with 1.55 million tonnes generated in 2012-13. We recently published survey results that estimate industrial & commercial waste generation to be 3.7 million tonnes and construction and demolition waste generation to be 3.4 million tonnes in Wales in 2012. Therefore it is worth noting that local authority municipal waste generation accounts for less than one fifth of the total waste generated in Wales.
- 2.2 In 1998-99 only 5 per cent of all local authority municipal waste in Wales was collected for preparation for re-use, recycling and composting. This has risen to over half of all waste collected by Welsh local authorities in 2012-13. Wales is the only UK country to have introduced statutory local authority recovery targets for waste recycling and, collectively, Welsh local authorities achieved the first target of 52 per cent in 2012-13. Individually, 13 of the 22 local authorities in Wales met or exceeded the 52 per cent target in 2012-13. Annex 1 shows each local authority's performance against the 2012-13 target.
- 2.3 Wales has reduced the amount of biodegradable municipal waste (food, paper, and garden waste) sent to landfill by 57 per cent over the last eight full years of the Landfill Allowances Scheme. This clearly demonstrates work to reduce the amount of biodegradable waste being sent to landfill by Welsh local authorities is succeeding. Annex 2 illustrates each local authority's Landfill Allowance Scheme performance for Wales in 2012-13.

¹ <http://naturalresourceswales.gov.uk/our-work/policy-advice-guidance/waste-Policy/landfill-allowance-scheme/?lang=en>

- 2.4 WG has many policies in their waste strategy “Towards Zero Waste” aiming to increase the quantities of waste recycled and the quality of the secondary materials produced as a result. A key element is geared towards improving the use of secondary raw materials (recycled wastes) within industry in Wales and to move towards a circular economy where all waste materials are used rather than disposed.
- 2.5 WG has targeted the wastes collected by local authorities in the first instance because of the high level of government control over this waste stream through the balance of local government finances provided by the WG relative to the council tax payments and additional ring fenced grant money, such as the annual Sustainable Waste Management Grant. For the private sector, government influence is primarily through waste legislation and impact on economic growth must be considered.

3. Issues

- 3.1 The WG Municipal Waste Sector Plan Collections Blueprint issued in 2011 sets out recommended service profile for the collection of waste from households. However, many local authorities had already started recycling service provision many years before in order to comply with requirements to divert waste from landfill under the Landfill Allowances Scheme (Wales) Regulations 2004. This has resulted in each local authority delivering services in different ways. WG offers all local authorities the opportunity to participate in a Collaborative Change Programme on the delivery of services. This programme aims to ensure that Wales meets the high recycling targets set out in Towards Zero Waste and follows the Collections Blueprint delivery model.
- 3.2 The costs of changing the type of recycling waste collection service can be considerable taking into account the provision of bins and boxes, together with the specialised collection vehicles. These costs together with practicalities of rolling out a new service (i.e. communicating these changes with residents), means that it takes considerable time to implement changes across the entire local authority area. In addition, even after roll out, there will be local issues where it may not be possible to provide the same collection service for all dwellings within a local authority such as densely populated areas (i.e. flats) and sparsely populated areas (i.e. rural areas).
- 3.3 Recent changes to the regulatory framework in respect to Material Facilities (MFs) coming into force on 1st October 2014, and provisions with respect to separate collection of materials for recycling coming into force on 1st January 2015, are pertinent to the issues subject to this inquiry. The effect of these regulations will be to increase the transparency of the reject rates and the quality of materials produced by all MFs, together with the quality of the materials supplied by each supplier. This will enable local authorities to better target their advice to householders to improve the quality of the materials they deliver to MFs for sorting, and to choose the MFs that they use, with evidence regarding the efficiency of their sorting practices. However, it is our view that it is too soon to provide analysis of how this will change practices given that the regulatory developments have not yet been implemented.
- 3.4 Historical service provision data is available from WasteDataFlow. From 2005-2012, a small set of data was collected relating to types of service provision provided by local authorities for dry, residual and compostable waste. However the structure of this data was not well designed, leading to ambiguity in the data provided. The method of collection was also inflexible, meaning authorities could not describe cross-authority variations in service provision. In 2012, we

redeveloped this dataset to improve and expand it. At present, reporting of this dataset has been made optional for local authorities, owing to the extra resource required by them to report to the statutory recovery targets from 2012-13 onwards. We will begin validation of this data for the 2014-15 reporting year. However, it is not possible to fully measure local authority service provision against the WG collections blueprint using this dataset alone.

- 3.5 As the monitoring authority for both the Landfill Allowances Scheme and the Local Authority Recovery Targets in Wales, we have access to performance data provided by the local authorities through the WasteDataFlow reporting system. Whilst the tonnages and percentages are easily accessible, information on collection methods used by local authorities and relating this to recycling performance is not readily available through WasteDataFlow alone. However, we are aware that Waste Resources Action Programme (WRAP) performs further analysis of WasteDataFlow data and collects additional service provision data. This information is made available to local authorities for benchmarking and to the public. It includes more detailed service provision data, and also includes yields by material. This dataset is available for at least the last 3 years via the WRAP portal (<http://laportal.wrap.org.uk/>).
- 3.6 Local authorities report the input/output from each MF facility that they send waste to in WasteDataFlow. Using this data, it is possible to calculate a reject rate for each local authority's waste flow through each MF. During 2012-13, we carried out a scoping exercise to understand the types of information local authorities were receiving in regard to reported reject rates at MFs. We will continue this exercise in future years to monitor improvements in data reported to local authorities from MFs. The forthcoming regulatory framework changes in respect to MFs will assist us to enhance our validation of local authority reported MF reject rates for the Local Authority Recovery Targets in due course.

4. Challenges for the Future

- 4.1 The statutory Local Authority Recovery Targets increase up to 70% in 2024-25. If local authorities are to achieve the more challenging targets set in Towards Zero Waste, they must sustain the momentum of increasing preparation for re-use, recycling and composting. This sustained increase will be difficult for local authorities because many have already made most of the necessary physical changes by providing recycling facilities and offering enhanced waste management services. Smaller incremental changes are still possible, but most of the more significant changes are already in place. Evidence available suggests that increasing food waste participation is one such area that has significant potential for improving household recycling rates and therefore should be focused on.
- 4.2 Persuading more people to take part in recycling is a priority. Public participation in recycling is voluntary, with few incentives and fewer penalties. The challenge for the Welsh Government in partnership with local authorities is considerable, to increase understanding, confront perceptions and change the behaviour of householders. For example, there is still confusion on what types of materials are recyclable such as plastics. A householder requires clear, simple and consistent advice to remain engaged and understand the importance of participation. Moreover, this challenge comes at a time of mounting economic pressures for all.
- 4.3 Whilst increasing recycling rates is important, it is essential that mechanisms and drivers are put in place to encourage prevention and re-use of waste as recognised by the WG waste prevention programme. Manufacturers have a role in assisting householders to prevent waste through

designing out waste in products as well as ensuring their products and packaging can be re-used or widely recycled by householders at the end of their use. Local authorities and other public sector organisations, including Natural Resources Wales, must ensure that they take steps to influence sustainable procurement so that it optimises low waste. Wales must create a circular economy that moves away from the current linear model, where materials are fed in to the economy at the start and discarded at the end.

- 4.4 Care must be taken to ensure that the drive to achieve the Local Authority Recovery Targets does not lead to perverse environmental and economic outcomes. For example, such issues could result, in part, from the lack of suitable alternative treatment facilities both within Wales and further afield. This could be exacerbated by the pace of high recycling targets not matching provision of waste facilities and by the shortage of adequate guidance for local authorities to understand the legitimate options open to them. Whilst we strongly support the principles of waste recovery and the clear benefits to the economy and environment of Wales from the appropriate recycling of wastes as a resource, this can only be in the context of wastes being managed appropriately, with necessary environmental safeguards.

We welcome the opportunity to provide oral evidence if invited to do so by the Environment and Sustainability Committee.

[For more information](#)

Please contact Isobel Moore Head of Business, Regulation and Economics
Natural Resources Wales
Tŷ Cambria, 29 Newport Road
Cardiff CF24 0TP
02920 466118

Isobel.Moore@cyfoethnaturiolcymru.gov.uk

Annex 1 – Local Authority Recovery Target performance 2012-13

Authority	(a) Total MSW (t)	(b) Total LART Reuse, Recycling, Composting (t)	(c) LART Reuse, Recycling, Composting Rate (%)	LART Target (t)	(d) Percent difference to target (%)	(e) Tonnage difference to target
Blaenau Gwent	32,911	16,853	51.2%	17,114	-1.5%	-260
Bridgend	63,536	36,284	57.1%	33,039	9.8%	3,245
Caerphilly	98,431	56,172	57.1%	51,184	9.7%	4,988
Cardiff	174,103	90,950	52.2%	90,533	0.5%	416
Carmarthenshire	71,188	38,280	53.8%	37,018	3.4%	1,262
Ceredigion	34,584	18,532	53.6%	17,984	3.0%	548
Conwy	66,812	37,712	56.4%	34,742	8.5%	2,970
Denbighshire	43,543	25,262	58.0%	22,643	11.6%	2,620
Flintshire	88,133	48,401	54.9%	45,829	5.6%	2,572
Gwynedd	76,976	39,412	51.2%	40,027	-1.5%	-616
Isle of Anglesey	41,942	23,162	55.2%	21,810	6.2%	1,352
Merthyr Tydfil	29,518	14,504	49.1%	15,349	-5.5%	-845
Monmouthshire	46,007	25,545	55.5%	23,924	6.8%	1,621
Neath Port Talbot	71,695	34,652	48.3%	37,282	-7.1%	-2,629
Newport City	65,802	32,362	49.2%	34,217	-5.4%	-1,855
Pembrokeshire	64,516	34,283	53.1%	33,549	2.2%	735
Powys	78,683	40,088	50.9%	40,915	-2.0%	-827
Rhondda Cynon Taf	114,325	52,822	46.2%	59,449	-11.1%	-6,627
Swansea	111,437	53,343	47.9%	57,947	-7.9%	-4,604
Torfaen	43,749	20,616	47.1%	22,749	-9.4%	-2,133
Vale of Glamorgan	59,780	32,568	54.5%	31,086	4.8%	1,482
Wrexham	75,840	40,063	52.8%	39,437	1.6%	626
Wales	1,553,512	811,866	52.3%	807,826	0.5%	4,040

- (a) the total amount of municipal waste arising for each local authority;
- (b) the total amount of municipal waste validated by the monitoring authority that has been recycled, prepared for re-use and composted;
- (c) the recycling, preparation for re-use and composting rates for each local authority;
- (d) the difference between the target amount for recycling, preparation for re-use and composting rates and the actual rate achieved by each local authority; and
- (e) the difference between the target amount for recycling, preparation for re-use and composting rates and the actual rate achieved by all the local authorities, taken as a whole.



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

National Assembly for Wales Environment and Sustainability Inquiry into recycling in Wales



**Cyfoeth
Naturiol
Cymru**
**Natural
Resources
Wales**

National Assembly for Wales Environment and Sustainability Inquiry into recycling in Wales

Annex 2 - Amount of BMW landfilled compared to landfill allowance for Local Authorities in Wales 2012/13



National Assembly for Wales Environment and Sustainability Inquiry into recycling in Wales

