



**National Assembly for Wales' Environment and Sustainability Committee
Inquiry: Recycling in Wales
10 June 2014**

DS Smith response

DS Smith welcomes the opportunity to respond to the National Assembly for Wales' Environment and Sustainability Committee inquiry into Recycling in Wales.

Representatives from DS Smith would be available to give an oral submission, if invited, during summer 2014.

About DS Smith

DS Smith is a multi-national group employing over 20,000 people with revenue exceeding £3.7 billion. It is the largest integrated paper and packaging company in the UK and the second largest packaging company in Europe. The Recycling Division provides the collection infrastructure to recover Paper, Packaging and other waste materials for recycling and sustainable landfill alternatives. Paper and Packaging recovered by the Recycling Division is reprocessed and remanufactured within the Groups own facilities. As well as providing the raw material for its own operations, quality recycled material collected by DS Smith is traded to reprocessors on a global scale.

As the largest fibre recycler in Europe DS Smith recovers circa 5.4 million tonnes of paper and packaging annually for recycling. Recovered packaging and other fibre grades provide the raw materials used in production by the group's paper making operations.

DS Smith response

1. As a company that collects materials for recycling and reprocesses them for further use quality is integral to everything we do. It is critical to receive materials from local authorities and businesses of a consistently high quality that can be reused and generates a high value.
2. In our experience, both in Wales and elsewhere in Europe, collecting through a source segregated system works the best. This experience will be echoed by all reprocessors. With this system we can be assured of the consistent quality, receiving paper and cardboard that can be fed into our paper mills for reprocessing, with the resulting product sent to packaging facilities to be remade into a cardboard box. Bring banks work particularly well in Wales, producing quality material, as do well managed and staffed civic amenity sites, that have



good signage and supervision, where the public are given the opportunity to separate material into single source bins.

3. The problems with quality arise from local authorities that offer mixed collection systems; often the material is too contaminated to be properly recycled. In some instances cardboard handpicked from the rest of material can be suitable, but it depends on the process for segregating it out. Machinery run in MRFs too fast often creates poorer quality output. While there are a few good MRFs operating in the UK, in general terms they currently do not generate adequate quality output. DS Smith welcomes the introduction of the MRF regulations but the issue of quality needs to be addressed through higher sample rates and greater frequency within these regulations. A low sample weight and low frequency will easily under or misrepresent the quality of the material. We believe sample weights for incoming material should be nearer 70kgs; a significant supplier should be sampled at least three times per week and the MRF should demonstrate a robust methodology to demonstrate a representative sampling technique.
4. An ideal source segregated collection system would be to have separate collection for fibre, separate collection for plastic bottles and metal cans, and a separate collection for glass. With contamination issues it is imperative that glass is collected solely on its own.
5. As a company we believe in adhering to the principles of the waste hierarchy. Because of the increased scarcity of resources we all have a responsibility to improve quality, following the principles of the waste hierarchy from the top down. Not by simply moving one rung above landfill, which is happening a lot at the moment, but by ensuring materials are collected in the most appropriate manner so they can be used again and again, extending their life and extracting the maximum value from them.
6. While we recognise the role waste treatment technologies have in the waste management process for residual waste, current collection methods mean that materials all too often end up at these treatment facilities, rather than being recycled or reprocessed. Collecting materials through a source segregated system can ensure the best value can be generated and resources kept within the economy for as long as possible. It is too easy to burn this material rather than follow the principles of the waste hierarchy.
7. We need a proper definition of what is meant by recycling rates to understand where the material collected for recycling actually ends up. In reality the recycling rates quoted today should be referred to as collection rates, as there is little concrete information as to the final destinations of materials.



8. We would welcome the introduction of an appropriate definition, creating greater openness and transparency to underline the true meaning of the term recycling rate. The Waste Framework Directive definition is: 'Recycling' means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations. Our current experience is that while materials are being diverted from landfill many are being sent for energy recovery because of its poor quality.
9. Householders need to fully understand what can or can't be recycled otherwise quality will be seriously affected. Consistent concise communications are required to remind people of what can go in the recycling bin and what still goes in the residual bin. We have seen in some parts of the UK that there is little difference in bags collected for recycling and those collected as residual waste when it comes to the processing stage.
10. There needs better understanding about the impact of products/packaging in domestic waste streams. There is discrepancy between something that is labelled as recyclable and something being 'easy to recycle' both at the point of disposal and the point of recovery. Stark examples of this can be seen in packaging, where a good example of best practice is packaging made from a single source.
11. DS Smith welcomed the recently published Waste Regulations Route Map, which provides useful help and support on interpreting the regulations concerning the separate collection of materials and principles of the waste hierarchy. While we promote source segregation as the best method of achieving high quality materials we do not believe legal challenges are the way forward in ensuring compliance with the regulations. Working closely with authorities or businesses identifying the best solution and providing consistent communications, both on what can be recycled and its final destination.