Question

- Q1. What is your name?
- Q2. What is your email address?
- Q3. Which of the options below best describes you? Academic or research

Response

Emma Beal as Chair of the National Association of Waste Disposal Officers (NAWDO).

admin@nawdo.org.uk

Business representative organisation/trade body

Charity or social enterprise

Community group Consultancy Distributor Exporter Individual Local government

Non-governmental organisation

Operator/reprocessor

Packaging designer / manufacturer / converter Product designer/manufacturer / pack filler Retailer including online marketplace Waste management company Other (please provide details)

X - National Local Authority Network

National Association of Waste Disposal Officers (NAWDO).

NAWDO membership represents around 80% of all local authorities

with waste disposal

duties and includes London Boroughs, Joint Waste Disposal

Authorities, Metropolitan,

Unitary and County Councils from all UK regions.

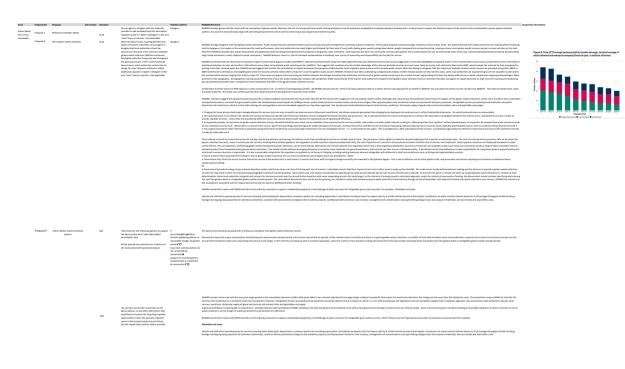
Q4. If you are responding on behalf of an organisatio n, what is its name?

Q5. Would you like your response to be confidential? Yes

No

Issue	Proposal No. Proposal	Sub-	Question		Tick Box	NAWDO Response
Intro		section	Q6		Aluminium Foil - Agree Aluminium food trays - Agree Steel and Aluminium aerosols -	
				Do you agree or disagree that local authorities	Agree Aluminium tubes - Agree Metal lids - Agree Cartons - Disagree	
Intro			Q7		Cartons	NAWDO broadly agrees with all the proposed materials, with the exception of cartons.
				set out, please state why this would not be feasible, indicing which dry recyclable material you are referring to in your response.		Current end markets are insufficiently stable for cartons, and in the first consultation it was stated that the addition of any material in the core materials would be dependent on it being possible to collect and sort and for end markets to be available. Some members collecting Tetra Pak separately, but at times unable to secure outlets for the material. Local authorities should not be in a position where it is necessary to transport Tetra Pak long distances with associated negative impact on air quality and carbon emissions, due to insufficient infrastructure, or there is tockpiling at any point in the supply change, which could pose a health and safety risk. Sufficient quantities will be needed to stimulate the market, yet there is a possibility that producers will choose alternative materials as a result of modulated fees under EPR measures, leading to smaller quantities of cartons for local authorities to handle.
						Poor quality material may result from the collection of aluminium tubes due to the higher levels of food contamination as they cannot be cleaned out sufficiently.
						As the successful inclusion of new materials is dependent on the engagement of residents, fully-funded, strong local and national communications will be needed to ensure residents present materials in the required way e.g. consolidate aluminium foil to large enough size that they can be captured at MRFs, and as much as possible rinse appropriate items.
Intro			Q8	Some local authorities may not be able to collect all these items from all households at kerbside by 2023/24. Under what circumstances might it be appropriate for these collection services to begin after this date?	Contract, MRF infrastructure	Collection of materials is unlikely to be the largest limiting factor in introducing these new materials, but rather the sorting, processing and end markets are lacking. Floxibility of implementation times needs to be built in to account for the lengths of waste collection and MRF contracts, and other changes such as EA and planning permit variations that may take time. This may vary for different local authorities. There needs to be recognition that local authorities may also incur costs for contract variations or termination.
				Please provide the reason for your response and indicate how long local authorities require before they can collect all of these materials, following the date that funding is available from Extended Producer Responsibility.		Technology may need adapting in current processes at MRFs to allow for additional waste streams. There also needs to be demand for the reprocessed material to ensure stable end markets.
Intro			Q9	Do you agree or disagree that food and drink cartons should be included in the plastic recyclable waste stream in regulations, to reduce contamination of fibres (paper and card)?		NAWDO disagrees with this proposal, due to the confusion by residents who already use an established system where it is normally collected with cardooard, and this practice is likely to continue, which would contaminate the card/paper stream anyway. Public perception is key in this change, and strong local and national communications would be needed to ensure that there is sustained change in behaviour. This classification as plastic would cause some issues with the lack of capacity at MRFs used by local authorities, and also difficulty with sorting due to the equipment
Intro	70		Q10	Please provide the reason for your response and state if there are any unintended consequences that we should consider.	Disagree - cartons should be included the paper and card recyclable waste stream or not sure	installed at MRFs.
				Assuming food and drink cartons are included by the date that Extended Producer Responsibility		flexibility for including a larger range of new materials or a greater quantity, but sudden changes may incur costs. Gate fees are particularly unstable for local authorities at the moment, and there is variance of gate fees for material mixes including Tetra Pak. Considering that there is no known mechanical equipment to separate Tetra Pak from other materials, an additional manual picking line would be required at some expense.
				commences, what would be the financial impact on gate fees and processing costs from sending mixed material streams containing cartons into a Materials Recovery Facility?		The impact on the change in the residual waste composition should also be considered. Where removal of a material from the residual waste stream causes a significant change in the calorific value, it may necessitate a contract negotiation.
Intro	Plastic film		Q11	Please provide the reason for your response. Do you agree or disagree that local authorities should adopt the collection of this material from all households, including flats, no later than 2026/27?		NAWDO disagrees that local authorities should adopt these collections. Some Local Authority contracts don't currently include the processing of plastic films. Costs and timescale to renegotate and change contracts to handle this material will be significant and would need to be covered, as will potential upgrading of MRF technology and purchase of any required vehicles. Sustainable end markets for plastic film are required, which are currently lacking. The quality of the material is of concern, considering that separate collections at supermarkets' from to Store' is currently of poor
				If you disagree, please provide a reason for your response.		quality. Producers should be providing an end market for the material they are producing for closed loop manufacturing.
					Disagree	Local authorities have already seen an increase in residents' queries regarding compostable packaging, demonstrating that there is an increasing quantity being used, and it is thought that this will start to replace standard plastic films more over time, decreasing the quantity of petroleum-derived plastics that local authorities collect.
						There is concern that the increase of collecting plastic film at the kerbside could result in more litter as it escapes from boxes and containers. There is a lack of clarity in the consultation document about which types of plastic will be included, and therefore there may be an increase in contamination if the list of plastic types is not comprehensive.
Intro			Q12	Which of the following reasons might prevent plastic film collections being offered to all households by the end of the financial year 2026/27? Please provide the reason for your response and	MRF Infrastructure capacity, reprocessing and end markets, Other	MRF infrastructure capacity - NAWDO is concerned that there is insufficient capacity at MRFs, that they are not currently equipped with suitable equipment to sort plastic film, and that this could not be resolved by 2026/7. Reprocessing and End markets - End markets are not currently sufficiently developed for plastic film, and there is insufficient demand for the material. NAWOO do not believe 2026/27 is a feasible time by which end markets will have
				provide evidence to support your answer.		developed. Some NAWDO members already collect plastic films, which is sorted and baled, but processed at cost, further emphasising the need for sustainable end markets and demand for the material Other - as above, compostable plastics are starting to replace conventional plastic film, and it may be phased out by
						Other - as above, compostable plastics are starting to replace conventional plastic nim, and it may be phased out by design. Please also see comments in response to Q11.

ssue Proposal No cod Waste Proposal 3	proposal Sub-section Defines what will be included in the	Question Q13	Do you agree or disagree that the above	Tick Box Answer	NANDO Resconse Please mote the following points that NANDO wishes to highlight:
ood Waste Proposal 3	Defines what will be included in the scope for food waste collections:	Q13	Do you agree or disagree that the above should be collected for recycling within the food waste stream?	Agree	Please note the following points that NAWCO wishes to highlight: The begs which contain pleats will degrade the quality of the digestate/compost produced in treatment processes. NAWCO recommends that Government bans the use of pleatics in tee bags sold in the UK lift is proposing to allow their inclusion in food waste services as standard.
	All food material that has become a waste, whether processed, partially		Agree Disagree		The Coverment should also be clear about whether bonis are included, given they are generally not "intended or reasonably expected to be consumed by humans".
	processed or unprocessed, intended to be, or reasonably expected to be consumed by humans and including		 Not sure/don't have an opinion/not applicable 		Finally, the Government needs to make it clear, through facilitated discussions with local authorities and the food waste treatment sector, whether unaukased food waste will be accepted or not (i.e. whether treatment plants will soutinely de-ackase items), and commit to producing
	consumed by humans and including any substance, including water, intentionally incorporated into the		If you disagree, please provide the reason for your response and specify which materials should be included or excluded		and funding national communications for consumers if unpackaged food waste is not accepted.
	food during its manufacture, preparation or treatment. This includes the following: • Food scraps		in this definition.		
	Tea bags Coffee grounds				
ed Waste Proposal 4	Separate collections to be provided to households by local authorities by 2023/24, 24/25 where existing (collection?) contracts limit, or 30/31 for long-term residual contracts that	Q14	Local authorities already collecting food waste separately must continue to collect this material for recycling at least weekly from the 2023/24 financial year	Not sure	ISC OPTION OF PROVISING COMMENTS AGAINST THESE OPTIONS - THEY ARE ALL JUST TICK AGUES, LUS EXCERCION OF NEXT QUESTION INTOINGS.
	are impacted Which parts of Proposal 4 do you		Local authorities should have a separate food waste collection service (at least	Disagree	
	agree with?		weekly) in place for all household properties including flats as quickly as contracts allow		
			contracts allow Local authorities without existing contracts in place that would be affected	Not sure	
			by introducing a separate food waste collection service should have a separate		
			food waste collection service in place (at least weekly), for all households including flats, by the 2024/25 financial year at the		
			latest		
			Local authorities with lone term existing		
			mixed food/garden waste collection or disposal contracts in place should have a	Disagree	
			separate food waste collection service in place (at least weekly) for all household		
			properties including flats as soon as soon as contracts allow, with an end date to meet this requirement between 2024/25 and 2030/31		
			Local authorities with lone term residual	Disagree	
			waste disposal contracts affected by introducing a separate food waste collection service (e.g. some Energy from		
			Waste or Mechanical Biological Treatment		
			food waste collection service (at least weekly) to all households including flats as soon as contracts allow, with an end date		
			to meet this requirement to be set between 2024/25 and 2030/31		
			Please provide any views on the end date for these obligations and any evidence on associated costs and benefits	N/A	The sea long time treatment/disposed contents in contract was local antiferring on contents and bytes 2000/11 and include NMF angle in KC processes that will be impacted by the introduction of agencies food usual collections. These local antiferring which is a contract to the contract of the contract to the contract of the contract
			associated costs and benefits		of cassing their (full) one warfer than planned, which the central system impacts about to considered for technologies like MSE given these include an element of bood waste treatment without the need for separate collections.
		Q15	What reasons might be appropriate for collection services to begin after the dates above?	All	ACTUAL TEATMENT COSTS HORSE THAN FUNDING ANALASE. The legact Assessment for this consultation has assumed that gate few for treatment of food water will remain similar to present levels in the future. Neverwey, MANTO strongly disagrees with this assumption for the following reasons: **Limited in guarant deval critication for all remaindably will inclementally change the supply-demand balance for treatment capacity, and investibly result in part few rings.
			Cost burden		2. An other of abouty regress that covered is specific depoted in clinic wall be endage. The west burstern copying the bit presents that covered is specific depoted in clinic wall be endage. The west burstern copying the bit presents the specific depoted in the specific depoted plant feet in the copying of bit presents that is all reads as the regress of bit presents of the copying of bit presents that the copying of bits bit is made in a part of bits of bits in the approximation for part of bits of bit
			☐ Deprocessing ☐ End markets ☐ Other (please specify)		4. supply came lang earl or meet amend in a sort user than the previousion or grant, any complete any entering. So, inflandance addings and properties of the previous and properties are services. Some sort of the previous and any complete and the previous and any complete and the previous and any complete and any complete any
			Conse (pinam specify)		Contact in contact and commissioning from private in the contact i
					tratement contracts in place (and eventually for others who need to are left tratement contracts.) he modelling that underpine the Government's decisions to take forward this policy week to be adultatedly eventual, in addition, New Burdens sattements paid through the reviews upport
					to considerations of the state will require a number of local authorities to take on an additional fleet without any maj potential to reduce the number of enther whiching the number of whiching needed for reductal water is normally governed by the time it takes to get now the local authorities to the contract of the local authorities to the contract of the local authorities to the local authorities and the local authorities are local authorities and the local authorities are local authorities and the local authorities and the local authorities are local authorities and the local authorities and the local authorities and the local authorities and the local authorities are local authorities and the local authorities and the local authorities and the local authorities are local authorities and the local authorities and the local authorities are local authorities and local authorities and local authorities and local authorities are local authorities and local authorities and local authorities and local authorities are local authorities and local authorities and local authorities and local authorities are local authorities and local authorities and local authorities are local authorities and local authorities and local authorities are local authorities and local authorit
					PROCUREMENT AND DELIVEN OF ILEET AND CONTAINES The modeling of a rew serve access the country is fairly to impose some agrificant challenges on the supply chains for whitele and containers to be able to leep up with demand, local authorities must be able to delay the launch of superate food waste services if they cannot sound the necessary experiment to be able to be able to on it.
					Constructions of the size of t
			If you have disagreed with any of the	N/A	NAVIOD disavers with the requirement to provide a separate food waste service to all households, on the basis that the delivery of the service to flats above shoots. houses coming directly onto the government or blocks of flats with swere scaled limitations will be externed of flats above shoots.
			proposed implementation dates above, please provide examples of circumstances where it would be appropriate for this		may be detrimental to the local street scene: - Tool waste bases left on the parament for several hours will create an obstraction to productions (particularly show with poor sight). - Tool waste to base left on the parament for several hours will create an obstraction to productions for productions and production of simple-our search will be made to be made to the production of the production of the production of simple-our search will be made to be made to the production of the production of the production of simple-our search will be made to the production of the production of simple-our search will be made to the production of t
			collection service to begin after these proposed dates and any supporting evidence where possible.		case extor fluids. Communication points on main nodes may be a possibility, but this needs to be properly tested first under a Government-funded study in order to develop models of best practice that can be rolled out elevenhere, and there may still be severe limitations on options for installing these is some areas.
ood Waste Proposal 5	We propose that the provision of caddy liners in the collection of	Q16	Do you agree or disagree with this proposal? Please provide any other	Not sure	NAXIOD highlights that caddy lines are designed to be compostable, which means their use in co-collected/po-treated services with gorden water is entirely appropriate. However, these materials do not break down at many entiring AD licities, meaning plant operators need to remote them when food water is collected and treated separately. Companies are therefore potentially operating additional money on cadely lines that are not actually needed, whils also being to deal with a type of law gloon startly that is inferentely weaker and more succeptible to
	separately collected food waste should be promoted as good practice and that guidance should be provided		comments on the use of caddy liners in separate food waste collections, including on any preferences for caddy liner		degradation due to hait and moisture than, for instance, a thin plantic bag. Wee' AD operators in this country have the same trouble with the lines not petting deposed (one I visited and the LA bod waste they received where lines were used through the same de-packaging bit they had for supermarket food waste). Given the Government has set out a clear
	on caddy liners, including on caddy liner material types.		material types. • Agree		direction in the RWS for food waste to go to AD, the use of composible liners is going to have to be looked at in more detail – their cost and lack of strength compared to other options would not seem to be worth it if they are not actually going to heak down during treatment from mortificial reads liners may be accommissed in filters are to be a final facilities to morared and mortificial reads liners may be accommissed in filters are to be a final facilities to morared and the mortificial reads liners may be accommissing to the final reads and the second
			 Disagree Not sure / don't have an opinion / not applicable 		on the scars than the Comment shaded consider whether an alternative appropriate play to every propriet to help make supplied of feed was to excessive if or sucknown or feed to every propriet to the propriet of the propriet of the propriet of the propriet to the propriet of the proprie
					Leapy data in both created consequences and part or water an incomplicating congenity processing practice part of the processing of the pr
od Waste Proposition	We propose to provide further	017	Do you have any commands on how the	N/A	week. Generally one time when people and food they start to wash less, then is a natural in bulk waste reduction with food waste. Therefore providing cally lines to be not automatically usdainly increase food capable rates. The Coverment needs to properly assess the types of inclinating that can break down these types of packaging to ensure there is a validar route to incorporating them into landard varies.
Prognati 0	we propose to provide number guidance to local authorities and other waste collectors on the collection and disposal of		Do you have any comments on how the collection and disposal of compostable and biodegradable materials should be treated under recording consistency.		There should also be resulation of the terms "compositable" and "boderstable" and "boderstable" in line with the findings of research into treatment options. Consumers are likely to do little more than places at labelline before makine a decision on how to discose of an item, and as such there should also
	control and draposal or compostable and biodegradable materials in kerbside waste streams.		treated under recycling consistency reforms? For example, this could include examples of what should be provided in		no scope for brands, retainer send other bodies to continue using terms that case confusion or mislate consumers about the environmental oredensials of their products. NAWOO would recommend the development of simple, top-based labelling (in line with they cle trough for any products that can for will eventually be able to jut depended of in food or garden washe collection sensions.
			guidance on the collection and disposal of these materials.		The Conserment should pay particular attention to product like disposable segans, which some numbulcaries have started by produce "Sodegradeds" evisions of the attent more environmentally-consisson comment. When evidual waste is being disposed of us 15M these offer not benefit a stall, and there may be regulatory implications for organic waste treatment facilities around receiving the contents of expairs own if they could result the "compostable" plants; the products are made from.
Waste		Q18	Do you agree or disagree that anaerobic digestion plants treating food waste should be required to include a	Not sure	A composing phase may assist with breaking down some materials after the disposition stage, but the feability of introducing this will be for plant operators to respond about. The ability of a compositing phase to break down compositable/biodegradable packaging needs to be properly examined to ensure that it would deliner the desired results, as otherwise it will just represent additional cost without a marked improvement in the quality of the end product.
			composting phase in the treatment process?		NAWO's would highlight that the addition of a composing phase will undoubtedly increase the gate fees for food waste treatment, both through additional operating costs as well as to cover capital repayments for expanding the treatment operation. This must be taken into account in the calculation of New Burdens funding for botal authorities.
			Agree Disagree Not sure / don't have an opinion / not		NAMCO would also paint out that "Dry AD" sectionlogy may be more appropriate to promote as part of any regional treatment capacity increases, given that it includes both digestion and composing phases while also permitting co-treatment [and thus co-collection] of food and garde water. This could generate both financial swings and carbon emission reductions compared to separate collections of the two organic materials.
			Disagree		NAMED would also print out that "Dy AC" submitting may be more operaprise to permit a part of any regional transferred county increase, glass that it includes both digestion and compacting phases while also permitting co treatment (and thus is collection) of fixed and gard wealth. This could generate lates fixed country and parties or market endurations compared to appeared collections of the two opposits examined.



ction	Question		Options Plastic and Metal	Response Agree
		Could the following recyclable waste streams be collected together from households, without significantly reducing the potential for those streams to be recycled?	Glass and Metal	Unsure
		If you have agreed with either of the above, please provide evidence to justify why any proposed exemption would be compatible with the general requirement for separate collection of each recyclable waste stream.		
	23	If you have agreed with either of the above, please provide evidence to justify why any proposed exemption would be compatible with the general requirement for separate collection of each recyclable waste stream.		

What, if any, other exemptions would you propose to the requirement to collect the recyclable waste in each waste stream separately, where it would not significantly reduce the potential for recycling or 24 composting?

Sub-section Question

NAWDO Response

NAWDO Response

NAWDO supports both of these proposals. Many local authorities currently co-collect both these combinations of materials without decreased quality. There are stable markets particularly for glass and metal. Co-collecting glass and metal could mean that glass bottle screw tops and jar lids are more likely to end up in the metals stream if separated from glass items during collection. Clarity would be required regarding the inclusion of cartons in the plastic stream, which NAWDO disagrees with.

Depending on DRS consultation outcome and subsequent removal of drinks containers from kerbside collections, co-collecting glass and metal may be more cost-effective for LAs who currently do not already glass at the kerbside.

An increased yield is likely where co-collected due to the ease of use by the resident, and could facilitate better recycling from flats where storage space for recycling can be limited.

icase i	roposal No. Proposal Sub-section	Queets	en.	Tick Box	NAMOO Exponse
TEEP 8	roposal 11 Conditions where an Technically exception may not apply, practicable and two or more recyclable waste streams may be collected together from households	Q2S	Do you have any views on the proposed definition for 'technically practicable'?	N/A	NAMEO agrees in principle with this definition. Netween, subject to the expansion in the range of areas that need to be aboushle in the consideration of technical practicability jos set out in QNA and Q775, the definition may need to be adjusted or
	responde waste streams may be collected together from households		"the separate collection may be implemented through a system which has been technically		Never, edge to the requirement of the reg of seas that need to be detained in the consideration of individual particularly just and in 1000 and 0277, the definition may need to be adjusted to the consideration of individual particularly just and in 1000 and 0277, the definition may need to be adjusted to the consideration of individual particular submitted particu
			which has been technically developed and proven to function in practice"		in addition, it needs to be made clear whether only UV-based examples of existing systems will be cited, or whether the regulator will be looking at other countries. There are regulatory and cultural differences related to water remangement that may need that, the state countries will be desired to expect the state of the state
TEEP		0,26	Do you agree or disagree that the proposed examples cover areas where it may not be	Agree	NAWOO agrees that these are appropriate examples. Nawoo agrees that there are appropriate examples. Nawow, its stiffung attacked densities for assessing associability, there must be scope to recomine that there can be similarest variations even within criteria such as "low of housing stock and
					Nexues, in sufficient desirable simplicities for exempling profitability, there must be recept to recept the fine on the deplication above from the critical profitability. These individual profits in the profit profits of the profit profits of the
			deliver separate collection? • Agree • Disagree • Not sure / don't have an opinion / not applicable		containers have to be awageed out for two-wheeled bins).
			opinion / not applicable If you disagree with any of the above, please provide the reason for your response and indicate which example you are		
			referring to.		
			Type of housing stack and accessibility Austility and geography of property location Availability of suitable containers		
			property location - Availability of suitable containers - Storage of containers at		
			- Storage in existing waste transfer infrastructure		
TEEP		Q27	What other examples of areas that are not 'technically practicable' should be considered in this proposal?	N/A	The criteria do not specifically include "subshilty of custoor presentation point for containent". This will be a factor for properties (such as flast above shops or houses with no)-very small front gardens) where obstructions to predestions would be caused by multiple containers being presented.
			considered in this proposal? Please be as specific as possible.		Traffic/road congestion should also be a factor for consideration of potentially slower/more obstructive multiple-stream collection systems, particularly on narrow roads, "red roades" etc.
TEEP	Economically practicable	0,28	Do you agree or disagree that the proposed examples cover areas where it may not be	Agree	NAWIOD agrees that these are appropriate examples. However, in setting up standard templates for assessing practicability, there must be scope to recognise that there can be significant variations even within criteria such as "type of housing stock and accessibility".
			'economically practicable' to deliver separate collection? • Agree		Suiting on the examples in previous zonwers, where front goden space is limited at street level properties, it may not be practicable for bins or bows to be provided to residents for a multi-stream necycling environ, requiring boal authorities to provide results or or advantage or inplication or bows to be provided to resident to a multi-stream necycling environ, requiring boal authorities to provide results or or advantage or inplication or box to box, which there have provide provided and to a multi-stream necycling environments.
			Disagree Not sure / don't have an opinion / not applicable if you disagree with any of the		
			If you disagree with any of the above, please provide the reason for your response and indicate which example you are		
			referring to.		
			Type of housing stack and accessibility Aurality and geography of		
			property location - Available recycling and treatment infrastructure		
TEEP		Q29	What other examples of 'economically practicable'	N/A	NAWCO believes there are a number of other critically important factors that should be taken into consideration for assessing economic practicability:
			'economically practicable' should be considered in this proposal? Please be as specific as possible.		1. Collection contents change costs. There were likely to be a marker of examples of local authorities who have collection contents in place designed assessed a certain system, and the costs of changing their and content will meed to be taken into account (depending on whether transition intology through DFB or fewer Muslems in sufficient to cover this). 2. Treatment/depands content prices. Some contents, particularly those be under the Private Finance Initiation, as he in Residue and even have fined prices for excycling that will man local authorities will
					not see cost savings as a result of moving to more segregated collection systems. 2. Actual treatment gate fees us modelled assumptions. It is essential that local authorities are able to assess economic practicability against the gate fees (plus any building and haudage) that they are able to
					get from the market for their material, rather than averages or benchmarks prescribed by the Government.
					4. Quantity and efficiency. The delivery of different excycling exvision different neighbourhoods scrotting to behink all practicability orbitate may laid to be lower award levels of appreciation of different practication required filters for and excitation required filters from an excitation required filters from a delivers. Association and excitation required filters from a reduced an excitation and excita
					5. Local congression/fericions charging schemes. The operation of additional collection which for more complex recording systems will, in some areas (such as Central London), potentially attract higher charges between of incollypeaned emission or competions zone. A CPS asserver, The CPS asserver, The CPS which have been also between Administrator will be made to local authorities has not been defined, and based on current Government concounts as set out in the
					4. SIR garpent. The formula by which payment from the DIP Cheen Administrator will be made to local authorities have cheen direct, and based on correst Generosest proposals as or cut in the DIP Consultation, from which provides daily not have desire DIP. Local authorities allowed because the local to the DIP Consultation, from the Consultation of the Consultation
					7. Now launders settlement. The process under which any lower funding will be calculated and allocated to local authorities has not benedified, but a understood by MANICO may be based on a basic formula and allocated through revenue support grant that will be subject to a future Government Spending Review. Local authorities must be able to assess the funding allocated compared to their actual costs as pare of considering excessing practicalities.
TEEP		Q30	Do you have any views on what	N/A	NAMBO considers excessive costs cannot be easily defined in terms of monetary value, given the significant variations in budget and size between different local authorities across the country. As such, a
			might constitute 'eucessive costs' in terms of economic practicability?		MADD contains receive costs cerest the extrapl defined interest framework period per the agendance of extraple and extrapl
					Given the Transcript presents on this mat was assured as unservices in making decisions on future service provision. Given the Transcript pressures is cold authorities continue to be under, any increase in not control and be considered to be excessive. The determination of this may require consideration of a balance of financial costs, entermored impacts, log explores set. WHOLO and insert that the Sectionment. In considerate flows to be information and in making the set of the consideration of a balance of financial costs, entermored impacts, log explores set. WHOLO and insert that the Sectionment. In considerate flows to be information and in making the set of the section of the set of the set of the set of the section of the set of the set of the set of the section of the set o
					Genetal for captured promotes that call and finish contributed to be suited, as in principle for the captured for the captured for the captured promotes for the captured prom
					improcessors indust be considered within additional business and itsia sussessment. Our members recycling centres have use specific constraints for example painting, permitting, projects space, contract implications and associated costs for managing the vast range of the waste streams accepted at these sites.
					There will also need to be consideration of the level of future cost certainty that different collection service designs can deliver. If boal authorities are exposed to fluctuations in noticeal resistent, a risk analysis of the potential fraction implication of such fluctuations will need to be factored into consideration about whether potential costs are exercise compared to more secondal-long term procedure classes do not make a market compared to more secondal-long term procedure classes do not several market configurations.
TEEP	No significant environmental benefit	Q31	Do you have any views on what should be considered	N/A	NAWO is concerned that the use of the word "significant" would suggest that the threshold for demonstrating environmental benefits (or a lack therein) of different collection options could be set very high. Depending on how "recessive costs" are defined, this could leave local authorities in a position that they are exposed to higher financial bundens for environmental benefits that may not justify such additional leapendars.
	benefit		'significant', in terms of cases where separate collection provides no significant environmental benefit over the		
			collection of recyclable waste streams together?		The determination of "spiffcard" environmental herefits may any from were to seen, and self appearance on white the Government includes with this support of invariance to the self-appearance of the self-appearance of the self-appearance of invariance invitages in large and 50 particles reliable to the self-appearance of the compression of the self-appearance of the
					There may be a role for carbon accounting in helping to find a balance between the financial costs of growlding services and the environmental benefits. Local circumstance are liainly to result in different outcomes from assessment of environmental benefits, to in increase like early, or in intense, whose local authorities forcing bod air quality problems (with the associated public health inspects that arise) may make a different determination of the adjustment of the country.
TEEP		Q32	Do you agree or disagree that the proposed examples for 'no	Agree	NAWCO agrees that these are appropriate examples. However, "availability of recycling facilities" must sufficiently capture the travel distance that will be required to reach such facilities, and the transport- nistated emissions that would result. It may be appropriate to change this to "availability and accessibility of recycling facilities" to ensure the haulage is taken into account.
			the proposed examples for 'no significant environmental benefit' are appropriate? • Agree • Observe		
			Agree Cisagree Not sure / don't have an opinion / not applicable if you disagree with any of the above, please provide the		
			above, please provide the reason for your response and indicate which example you are referring to.		
			referring to GHG emissions (whole		
			systems) - Lifts per vehicle and journey		
			length - Auxiliability of recycling facilities - Reject tornages		
TEEP		Q33	What other examples of 'no-	N/A	NAWICO believes that there are a number of other factors which should be taken into account:
		-des	What other examples of 'no significant environmental benefit' should be included in this proposal? Please be as specific as possible.	.476	Nation of better that the season of the seas
			specific as possible.		authorities. Multi-direan collection systems which require a greater number of vehicles and/or slower speeds of collection may cause further detriment to the local environment, not only through the embissions of the collection first that also posterially from order read vehicles that are delayed because of the increased complexity of the collection system, audicol authorities need to be able to take the insert account storage contradictional or water. All of embission.
					 Developments in scring technologies must be factioned in, and any templates/benchmarks used be sufficiently adaptable to reflect this. For example, individual MSSs may be able to achieve higher material qualifies through improved sorting processes and technology than overall industry averages.
					1. The hypes of hreatment technology available must also be considered for example, access to Diny AC may enable local authorities to co-collect food and genders waste (abbeit presented separately by resident), acknowing using on collection carbon emissions to one effor separate goders waste round, generating bioges for energy generation (a). Whet AC done), and producing a more useful said and producing in the degree waste producing to access the collection of the degree waste producing to access the collection of the degree waste producing to access the collection of the degree waste producing to access the collection of the degree of of the d
					product (the not depends usually producted by Viet ACO) in the form of a high quality composit. The first must be copied a middle product production of positive rate, who was less that is lower for more complex encycling systems where residents are regalated to appeared a hornic action and positive rate, who was less to be lower for more complex encycling systems where residents are regalated to appeared a hornic action and the state of the state of the state of the state of the action and the state of the state of the action to determining whether the service should not be formed and and a positive of the tables into account in determining whether the service should not be introducted and and the positive of the state of the action of the action account in determining whether the service should not be introducted and a positive of the state of the account in determining whether the service should not be introducted and a positive of the state of the account in determining whether the service should not be a state of the account in determining whether the service should not be a state of the account in determining whether the service in the account in determining whether the service should not be a state of the account in determining whether the service should not be a state of the account in determining whether the service should not be a state of the account in determining
					speaks. Limiting, the field growth gliss (applied from 2 and 10 a
TEEP F	voposal 12 in circumstances where it is not technically or economically participally, or where there is no significant environmental benefit to collecting two or	Q34	Do you agree or disagree that local authorities should only be required to submit a single written assessment for their	Agree	NAMICO agrees that a single written assessment should be appropriate for each local authority, and that there may be circumstances where combined assessments across authorities sharing infrastructure would be appropriate.
	or where there is no significant environmental benefit to collecting two or more waste streams		- Agree - Disagree		The review points/periods for these assessments must be made clear to enable local authorities to subably plan the necessary resource allocation. Furthermore, single or continee@filed assessments should be permissible for two-fier areas where single/joint contracts are in place, with cumulative/combined consideration of environmental benefit, substituted and environmental practicability.
	more waste streams separately, obligated parties are required to complete a written		 Not sure / don't have an opinion / not applicable 		WASHING AND PROCESSORY.
	assessment. We want to avoid		If you disagree, please provide the reason for your response		
	local authorities. We therefore propose that local authorities which only be required to complete a single written assessment for their	Q3S	What other ways to reduce the burden on local authorities	N/A	NMXO is concerned that the agreeas this consplance and enforcement will be leaving local authorities responding patientally costly-challenging-sladed moiner processes faunched by interveding patients when may wish to be served to althorities a leaving patient and authorities a securior process is sufficiently supported by both the regulator and in law so that but a substance in software processes is sufficiently supported by both the regulator and relative software and the substantial securities and substantial securities.
	only be required to complete a single written assessment for their sprice were which will		should we consider for the written assessment?		Furthermore, the review and approval of written assessments by the regulator must be completed within a set time period so that local authorities are able to move forward with procuring and
	service area, which will take account of the different exceptions, rather than multiple assessments				implementing services. These must also include an opposity process for local Authorities and the Regulator, especially when there is a disagreement. There should be no possibility of a written assessment being rejected by the regulator after a set time period. TEEP assessment must remain valid for a period of time enabling capital expenditure to be depreciated and a contract cycle to be completed.
	for the same service area. It may be appropriate for a	Q36	What factors should be taken into consideration including in the written assessment? For example, different housing	N/A	NAWOOD has already identified a number of factors in the responses to the entire questions on technical lenvironmental practicability and "no significant environmental benefit". To summarise the key points:
	completed across more than one authority. For example, for two-tier		the written assessment? For example, different housing stock in a service area, costs of breaking existing contractual arrangements and/or access to		Solido Law sealing districts in heart or received in the earth of the contract and temperature processing at the original environmental enviro
	authorities, partnerships, or authorities that share treatment infrastructure.		breaking existing contractual arrangements and/or access to treatment facilities.		-Pre-existing infrastructum, including collection vehicles, containers and sorting facilities Contract change, break costs.
		027	Do you generated the	N	NEWTO believe that the projection of most disconsistence are a student facilities and falls could be useful to the second to the books for formal substitutes consistence within a second to the secon
		uj27	values and data, which could be used to support a written	Not sure	ignificant variations in circumstances and costs between different areas. Furthermore, the determination of these values must be based on realistic evidence (which may vary from region to region) and be updated regularly to reflect inflation, changes in material markets and
			assessment, would be useful? - Agree - Disagree		other factors.
			- Not sure / don't have an opinion / not applicable		The standard default values and data must be fully referenced so that local authoration can check whether they are applicable to their own circumstances. Values that are based on commercially sensitive information which carron the sense checked by other parties may not be suitable.
		Q38	If you disagree, please provide the reason for your response Do you agree or disagree that a template for a written	Agree	The template could build upon the Route Map work that was undertaken by a group of local authority networks in 2014/15. Guidance should be available for completing the template in order to ensure that a consistent approach is taken across the country, which will minimise the work needed by the regulators to review these.
			assessment would be useful to include in guidance? - Agree		The standard template should set triggers to show when 'significant contr' have been triggered – overall whole system costs to include collection and disposal costs. Funding model is set by Scheme Administrator for UFR and additional busdem, there is combined funding sources. A local authority should not be placed in a position where whole system costs shows a design system of collection meets
			- Disagree - Not sure / don't have an opinion / not applicable		TED assessment and separate collections of materials and yet placed in an unacceptibile position due to funding pape.
			If you disagree, please provide the reason for your response		

Issue	Proposal No.	Proposal Sub- section	Question	Options		er NAWDO Response
					Agree.	NAMOD support the proposals concerning the collection of fibres and plastic film. However, this is heavily cowarded that it must be subject to TEEP and implemented in suitable (restricting deliverable) timeframes. As for many of our members this not be the best approach in their local area and circumstances. Introduction once separation of any recyclibite chook side quality but it the same time it reduces the use of this service for receivers, or many reduce the next of useful confidence of the confidence of t
39		13	Do you agree or disagree with Proposal 11, particularly on the opporation of files from other recyclable water that is used the collection of plastic class?	Agree/Tragene/Not Swe/don't have an opinion If diagree, please provide the reason for your response		Leg of this set files, and the control of the contr
40		14	Which service areas or materials would be helpful to include in non-statutory guidance?	Open answer		Whilst in theory there are many suitable (and worthy) areas that could be good candidates for the application of non-statutory guidance at NAWOO we are mindful of the volume of change proposed. This namely the five dot topics in the consistency consultations namely TEE, compliance and enforcement, div recyclable minimum service standards, resided uses a minimum service standards and food & guidence appeared as consistent or food the particle standards and food & guidence appeared as consistent or substance placed in the consistence of and so with suspect of proposed consistence while the Period Section of the suspect of proposed consistence while the Period Section while the Period Section of the consistence in the consistence while the Period Section of the consistence while the Period Section of the consistence in the consistence while the Period Section of the consistence while the Period Section of the Sect
41		15	Do you have any comments on the recommendations from the review for the policy of the Environmental Permitting Regulations?	Open answer		NAWOO would support the seven recommendations as stated on page 63 of this consultation to amend Schedule 9 of the Environmental Permitting Regulations 2016 ("Schedule 9"). However, we'd propose that intakly we're target are larget to a minimum in order to primarily manure that Schedule 9 is aligned and supportive of the reporting aspects required with other proposed charges (e.g. relevant as well-or may are larger than recreat consultances related to 155 and 167%, who not consider that all off the recommendations proposed are assertial to the function of Schedule 9 and are more enhancements, NAWOO would welcome the opportunity to work with Government and comment upon the draft legislation.
42		15	If amendments are made to Part 2 of Schedule 9, do you agree or disagree that it is necessary to condinue to relatin requirements to sample non-pactaging dry recyclable materials?	□Rigree □Biagree □Bias use / don't have an opinion / not applicable Please provide the reason for your response where possible.	Agree.	Additionally, it is highly likely the requirements may change over the next few years as services align with the required changes (e.g. dry recyclable collection systems) and the impact of proposed changes manifest. In theory in the structure and approach of MRF nationally would follow changes in waste collection systems and composition. The unificated consequences maybe to all back or significantly amend the proposed changes, buther a complexing which contains single from requirement contract changes for the advantages. Capital single consequences are proposed to the proposed changes in the complexity of the complex

ssue	Proposal No.	Bronoral	Sub-	Question	Options	Tick Box Answer	NAWDO Response
4.	·	5	Section	Do you agree or disagree that provision for exchange of recycling credits should not relate to packaging material subject to Extended Producer Responsibility payments?	Agree/Disagree	Agree	NAWDO agrees with the proposals in the consultations to remove recycling credits for materials that are expected to be included within the EPR process. Concerns are mainly around any potential funding gap between the removal of recycling credits and the Full Net Recovery cost payments being received by processors.
4	4			In relation to recycled waste streams not affected by Extended Producer Responsibility or which are not new burdens we are seeking views on two options	Option 1 Should we retain requirements for Waste Disgosal Authorities to make payment of recycling credits or another levy arrangement with Waste Collection Authorities in respect of non-packaging waste?, Agree/Disagree/Not sure	Not sure	NAWDO have concerns in how a universal payment could be made consistently and correctly across organisations for only non-packaging waste and implemented across the Country ensuring all aspects of the Value chain are considered and reimbursed accordingly. Another mechanism needs to be considered for reimbursing WCA for non-packaging waste.
							It is felt that the recycling credit funding mechanism as set out in legislation is no longer relevant or fit for purpose, and a reform either within legislation or agreed at local level (Local Area Agreements) to be the most appropriate due to the vast differences between Local Authorities. Consideration needs to be given to ensure the correct authorities receive the appropriate funding to manage the operational needs i.e. Collection and Disposal. In addition, is a process and system needs to be put into place to ensure these agreements are fair to both tiers of local government.
					Option 2 Should we discontinue recycling credits and require all two-tier authorities to agree local arrangements? Agree/Disagree/Not sure	Agree	The recycling credits for non-packaging waste need to be viewed in the context of a continued and sustained decline in the amount of paper/newsprint collected for recycling. Any changes in the system should be designed with this in mind and the likely future occurrence of paper in the recycling stream in the next five to ten years.
4	5			Where local agreement cannot be arrived at what are your suggestions for resolving these? For example, should a binding formula be applied as currently and if so, please provide examples of what this could look like.			NAWDO believe that in the unlikely event a local agreement can't be reached, Government should consider putting in place an appropriate appeals/mediation process. Purely by having the process in place it is more likely an agreement can be reached and stops one tier acting in a unliateral manner.

Proposal	Question	·	Alatife vypou	Aurabia sammana.
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Impacts of Consistence	26 CY	Costs and benefits	78	Do you have any comments and/or evidence on familiarisatio costs (e.g. time of FE[1]) speet on undestanding and implementary now requirements) and organize costs (e.g. sorting costs) to households and businesses?	n N/A	The infrastructure which requires delivering in a short space of time the necessary consents (planning and permitting) resources and funding will be needed. Micro business may well require 1.1 support either via LEPs or through local authorities - need dear and simple information in the form of some simple set of rules to support them through the changes. Physical space constraints and/or communal collection areas would help. Enforcement and engagement for h/hold and business implementation - will require funding. Typically when our members set up major service changes usually requires a decicated team of at least 8 FEX, supplemented by from the back office - contact centres, consultation team, communication teams, business intelligence and digital/off. Teams. With the addition of business water easily read a team of 21 FEX and working in collaboration with the LEPs. MAVEO Delivers these are incorrect and using outdated data and assumptions. The £75 million savings assumed in Table 39 we have serious necessarions they are achievable as it does not account for the variation in approaches, assumes savings from landfill rather than EFW or other accessions and access some size of collections are presently much lower than free services. Fower vehicles are used in collections: their rocts are for more collections: their rocts are for more collections: the rocts are for more collections: their rocts are for more collections: their rocts are for more collections: the rocts are for more collections.
	26	Costs and benefits	79	Do you have any comments on our impact assessment assumptions and identified impacts (including both monetise and unmovelised)?	d	Carbon savings should be consistently applied to material streams and compared against the most appropriate treatment route (MBT and Energy from Waste), landfill disposal is less prevalent as an option. NAWDO members have been undertaking compositional analysis of their residual waste over the last few years, one local authorities are experiencing low levels of garden waste within the residual waste streams ranging from 2.6% to under 7%. There does not appear to be any strong correlation between the charges levied by local authorities and the level of garden waste remaining in the residual stream, appear to be any strong correlation between the charges levied by local authorities and the level of garden waste remaining in the residual stream, appearing those was evaluated to waste composition sampling methodologies. More pertinent is the topography, demographics, housing stock and the time of year the waste composition analysis was completed. NUEL shows that all of the top top local authorities charge for their given waste collection service and how this therefore does not appear to impact adversely on high levels of recycling and residual kg per household performance when compared to those Authorities that offer a free garden waste collection service.
						NAWDO remains firmly of the opinion that given the integrated nature of the Government's proposals in relation to not only Prevention, Consistence, ERR and DSK we have concerns in respect to the overall model being or forward by the Government. The Government's approach has never been tried in the UK especially with funding mechanisms that are untested and opage at best with significant risks remaining with local authorities. The Government needs to underwrite such risks. The impact assessments make clear DEFA assumptions of overall net positive value because of the assumptions it makes about the income from EPR and to a lesser extent DEG.
						If the Government wants local authorities to move forward and implement to their timeline they must be explicit about their financial modelling and how their still impact local authorities a untilary, upper and lower level. Local authorities without part of the properties which the modelling assumes under EPR full net cost modelling.
Impacts of Consistence Feedback	cy N/A	Feedback	8	Overall, how satisfied are you with our online consultation too Very satisfied 80 Satisfied	Neither satisfied nor dissatisfied	

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