

Question

Q1. What is your name?

Q2. What is your email address?

Q3. Which of the options below best describes you? Academic or research

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)

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

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

No

Response

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

admin@nawdo.org.uk

X - National Local Authority Network

National Association of Waste Disposal Officers (NAWDO).

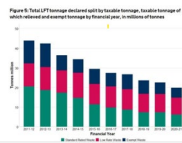
NAWDO membership represents around 80% of all local authorities with waste disposal duties and includes London Boroughs, Joint Waste Disposal Authorities, Metropolitan, Unitary and County Councils from all UK regions.

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Issue	Proposal No.	Proposal	Sub-section	Question	Tick Box	NAWDO Response
Intro				Q6	Aluminium Foil - Agree Aluminium food trays - Agree Steel and Aluminium aerosols - Agree Aluminium tubes - Agree Metal lids - Agree Cartons - Disagree	
Intro				Q7	Do you agree or disagree that local authorities should be required to collection materials Kerbside: Alu Foil, Alu food trays, Steel/Alu aerosols, Alu tubes, Metal jar lids, Tetra pak If you have disagreed with the inclusion of any of the additional materials above in the timeframe set out, please state why this would not be feasible, indicating which dry recyclable material you are referring to in your response.	Cartons NAWDO broadly agrees with all the proposed materials, with the exception of cartons. 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 stockpiling at any point in the supply chain, 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? 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.	Collection Contracts, Sorting Contract, MRF infrastructure capacity, Cost Burden, Reprocessing, End markets. 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. Flexibility 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. 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)? 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 NAWDO disagrees with this proposal, due to the confusion by residents who already use an established system where it is normally collected with cardboard, 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 installed at MRFs.
Intro				Q10	Assuming food and drink cartons are included by the date that Extended Producer Responsibility 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? Please provide the reason for your response.	Not Sure Where local authority processing contracts at MRFs are built around a 'basket' of materials, there may be a degree of 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. 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	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? If you disagree, please provide a reason for your response.	Disagree 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 renegotiate 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 supermarket's 'front of store' is currently of poor quality. Producers should be providing an end market for the material they are producing for closed loop manufacturing. 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 provide evidence to support your answer.	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 2026/27. Reprocessing and End markets - End markets are not currently sufficiently developed for plastic film, and there is insufficient demand for the material. NAWDO do not believe 2026/27 is a feasible time by which end markets will have 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 design. Please also see comments in response to Q11.

Issue	Proposed No.	Proposed	Sub-section	Question	Tick Box Answer	NARWQ Response
Food Waste	Proposal 3	Define 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	<p>Please note the following points that NARWQ wishes to highlight:</p> <p>Tea bags which contain plastic will degrade the quality of the digestate/compost produced in treatment process. NARWQ recommends that Government bans the use of plastics in tea bags sold in the UK if it is proposing to allow their inclusion in food waste services as standard.</p> <p>The Government should also be clear about whether bones are included, given they are generally not "intended" or reasonably expected to be consumed by humans".</p> <p>Finally, the Government needs to make it clear, through facilitated discussions with local authorities and the food waste treatment sector, whether unopened food waste will be accepted or not (i.e. whether treatment plants will routinely de-package items), and commit to producing and funding national communications for consumers if unopened food waste is not accepted.</p>
		All food material that has become a waste, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be consumed by humans, and including any substance, including water, intentionally incorporated into the food during its manufacture, preparation or treatment. This includes the following: • Food scraps • Tea bags • Coffee grounds				
Food Waste	Proposal 4	Separate collections to be provided to households by local authorities by 2023/24, 24/25 where existing (collection?) contracts limit, or 20/21 for long-term residual contracts that are impacted.	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	NO OPTION OF PROVIDING COMMENTS AGAINST THESE OPTIONS - THEY ARE ALL JUST TCR-BONKS. USE BOX BELOW OR NEXT QUESTION INSTEAD.
		Which parts of Proposal 4 do you agree with?		Local authorities should have a separate food waste collection service (at least weekly) in place for all household properties including flats as quickly as contracts allow	Disagree	
				Local authorities without existing contracts in place that would be affected 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	Not sure	
				Local authorities with long term existing mixed food/garden waste collection or disposal contracts in place should have a separate food waste collection service in place (at least weekly) for all household properties including flats as soon as contracts allow, with an end date to meet this requirement between 2024/25 and 2030/31	Disagree	
				Local authorities with long term residual waste disposal contracts affected by introducing a separate food waste collection service (e.g. some Energy from Waste or Mechanical Biological Treatment contracts) should introduce a separate 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	Disagree	
				Please provide any views on the end date for these obligations and any evidence on associated costs and benefits.	N/A	There are long term treatment/disposal contracts in some local authorities can continue well beyond 2030/31, and include MBT and/or IVC processes that will be impacted by the introduction of separate food waste collections. These local authorities should not be required to break or change these contracts unless Government funds this, and full consideration should be given to the economic and environmental impacts of doing so. These facilities - and associated collection infrastructure - contain embedded carbon that must be part of considerations as to the impacts of ceasing their (B2U) use earlier than planned, whilst the overall system impacts should be considered for technologies like MBT given these include an element of food waste treatment without the need for separate collections.
			Q15	What measures might be appropriate for collection services to begin after the dates above?	All	<p>ACTUAL TREATMENT COSTS HIGHER THAN FUNDING AVAILABLE</p> <p>The Impact Assessment for this consultation has assumed that gate fees for treatment of food waste will remain similar to present levels in the future. However, NARWQ strongly disagrees with this assumption for the following reasons:</p> <ol style="list-style-type: none"> 1. Mandating separate food waste collections for all households will fundamentally change the supply-demand balance for treatment capacity, and inevitably result in gate fees rising. 2. A number of subsidy regimes that currently support anaerobic digestion facilities will be ending. 3. New treatment capacity will be needed in some areas, requiring capital investment that will need to be repaid through gate fees. 4. Supply chains being able to meet demand in a short lead time is questionable for plant, equipment and vehicles; 5. Infrastructure delivery capacity from tender stations, depots, treatment facilities (AD) together with the necessary consents needed e.g. planning and permitting process, likely possible market distortion coupled with a short window to claim the greenhouse subsidies, which will cause investment uncertainty. Government could consider streamlining planning and permitting process to enable accelerated delivery and extend the timelines for the green house subsidies. Lead in time for any form of infrastructure is typically 2-5 years (necessary consents) and then the actual construction and commissioning phase, minimum 4 years can be longer (3-4 years) if there are delays in securing the necessary consents / challenges and associated judicial reviews. <p>Certainty is needed to make investment decisions - something has to move first - brief window to claim the greenhouse subsidy. Lead in time for stage change to build processing capacity is difficult. Normally need 4 years lead in time plus which is more realistic. Assumed savings are unlikely to materialise if market prices are as premium. Our members have plenty of experience in delivering infrastructure. As a consequence, the costs for providing separate food waste collections are likely to be higher than the Government is assuming for these authorities without treatment contracts in place (and eventually for others who need to re-tend treatment contracts). The modelling that underpins the Government's decision to take forward this policy need to be substantially re-visited. In addition, New Burdens commitments paid through the revenue support grant to local authorities will need to be responsive to changes in the costs for providing the service, particularly between Spending Review rounds where this matter is considered, otherwise local authorities will potentially not be receiving sufficient funds for continuing the service.</p> <p>UNAVAILABILITY OF DEPOT SPACE</p> <p>Introducing separate collections of food waste will require a number of local authorities to take on an additional fleet without any real potential to reduce the number of other vehicles (the number of vehicles needed for residual waste is normally governed by the time it takes to get round the local authority area to empty all bins, rather than the amount of waste being collected). This will create a requirement for additional depot space that may not be available at existing sites, and if New Burdens funding does not cover the capital costs for expanding facilities or buying new depot spaces, it may not be feasible for local authorities to introduce these services.</p> <p>PROCUREMENT AND DELIVERY OF FLEET AND CONTAINERS</p> <p>The realisation of a new service across the country is likely to impose some significant challenges on the supply chains for vehicles and containers to be able to keep up with demand. Local authorities must be able to delay the launch of separate food waste services if they cannot source the necessary equipment to be able to run it.</p> <p>COMMUNICATIONS</p> <p>There will need to be significant and ongoing spend on communications with households, otherwise participation and capture rates are likely to be low and the risks of contamination will be higher. If the Government does not adequately fund this through New Burdens - noting that it is not a one-off cost at the point of service change - then it may not be cost-effective for local authorities to invest in providing what is likely to be an underperforming service.</p> <p>If you have disagreed with any of the proposed implementation dates above, please provide examples of circumstances where it would be appropriate for the collection service to begin after these proposed dates and any supporting evidence where possible.</p>
Food Waste	Proposal 5	We propose that the provision of caddy liners in the collection of separately collected food waste should be promoted as good practice and that guidance should be provided on caddy liners, including on caddy liner material types.	Q16	Do you agree or disagree with this proposal? Please provide any other comments on the use of caddy liners in separate food waste collections, including on any preferences for caddy liner material types.	Not sure	<p>NARWQ highlights that caddy liners are designed to be compostable, which means their use in co-collected/co-treated services with garden waste is entirely appropriate. However, these materials do not break down in many existing AD facilities, meaning plant operators need to remove them when food waste is collected and treated separately. Consumers are therefore potentially spending additional money on caddy liners that are not actually needed, while also having to deal with a type of bag (from starch) that is inherently weaker and more susceptible to degradation due to heat and moisture than, for instance, a thin plastic bag.</p> <p>"We" AD operators in this country have the same trouble with the liners not getting digested (one I visited ran the LA food waste they received where liners were used through the same de-packaging kit they had for supermarket food wastes). Given the Government has set out a clear direction in the B2U for food waste to go to AD, the use of compostable liners is therefore how to be treated 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 break down during treatment. Promoting caddy liners may be appropriate if there are to be changes made to AD facilities to ensure the products break down, or if they can be segregated from not only the food waste but also other contaminants in order to be sent to a composting facility. However, if this is not the case then the Government should consider whether an alternative approach might be more appropriate to help make recycling of food waste convenient for residents without requiring additional money to be spent unnecessarily by consumers or local authorities. This could include studying the effectiveness of depackaging technology to enable residues to be used instead, for instance, the bag their loaf of bread comes in to line their caddy.</p> <p>Caddy liners should receive consideration as part of wider thinking on compostable/biodegradable packaging. The Government will need to engage with the retail sector if caddy liners are features in food collection systems, particularly if provided by local authorities, given many supermarkets sell these products most are not to the required standard therefore have compatibility issues with the treatment systems.</p> <p>NARWQ members would like us to highlight the figures are not realistic in terms of food which could be captured, NARWQ members have been collecting separate food waste for many many years. the food waste capture rate on average 65.13 kg/hold per equating to 1.25kg/HD per week. Generally over time where people are food they start to waste less, there is a natural in built waste reduction with food waste. Therefore providing caddy liners does not automatically suddenly increase food capture rates.</p>
		We propose to provide further guidance to local authorities and other waste collectors on the collection and disposal of compostable and biodegradable materials in kerbside waste streams.		Do you have any comments on how the collection and disposal of compostable and biodegradable materials should be treated under recycling consistency reforms? For example, this could include examples of what should be provided in guidance on the collection and disposal of these materials.	N/A	<p>The Government needs to properly assess the types of technology that can break down these types of packaging to ensure there is a viable route to incorporating them into kerbside streams.</p> <p>There should also be regulation of the terms "compostable" and "biodegradable" in line with the findings of research into treatment options. Consumers are likely to do little more than glance at labelling before making a decision on how to dispose of an item, and as such these should be no scope for brands, retailers and other bodies to continue using terms that cause confusion or mislead consumers about the environmental credentials of their products. NARWQ would recommend the development of simple, sign-based labelling (in line with Naysire News) for any products that can (or will eventually be able to) be disposed of in food or garden waste collection services.</p> <p>The Government should pay particular attention to products like disposable nappies, which some manufacturers have started to produce "biodegradable" versions of to attract more environmentally conscious consumers. Where residual waste is being disposed of via EFW these offer no benefits at all, and they may be regulatory implications for organic waste treatment facilities around recovering the contents of nappies even if they could treat the "compostable" plastics the products are made from.</p>
Food Waste	Proposal 6	We propose to provide further guidance to local authorities and other waste collectors on the collection and disposal of compostable and biodegradable materials in kerbside waste streams.	Q17	Do you have any comments on how the collection and disposal of compostable and biodegradable materials should be treated under recycling consistency reforms? For example, this could include examples of what should be provided in guidance on the collection and disposal of these materials.	N/A	<p>The Government needs to properly assess the types of technology that can break down these types of packaging to ensure there is a viable route to incorporating them into kerbside streams.</p> <p>There should also be regulation of the terms "compostable" and "biodegradable" in line with the findings of research into treatment options. Consumers are likely to do little more than glance at labelling before making a decision on how to dispose of an item, and as such these should be no scope for brands, retailers and other bodies to continue using terms that cause confusion or mislead consumers about the environmental credentials of their products. NARWQ would recommend the development of simple, sign-based labelling (in line with Naysire News) for any products that can (or will eventually be able to) be disposed of in food or garden waste collection services.</p> <p>The Government should pay particular attention to products like disposable nappies, which some manufacturers have started to produce "biodegradable" versions of to attract more environmentally conscious consumers. Where residual waste is being disposed of via EFW these offer no benefits at all, and they may be regulatory implications for organic waste treatment facilities around recovering the contents of nappies even if they could treat the "compostable" plastics the products are made from.</p>
Food Waste			Q18	Do you agree or disagree that anaerobic digestion plants treating food waste should be required to include a composting phase in the treatment process?	Not sure	<p>A composting phase may assist with breaking down some materials after the digestion stage, but the feasibility of introducing this will be for plant operators to respond about. The ability of a composting phase to break down compostable/biodegradable packaging needs to be properly examined to ensure that it would deliver the desired results, as otherwise it will just represent additional cost without a marked improvement in the quality of the end product.</p> <p>NARWQ would highlight that the addition of a composting 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 local authorities.</p> <p>NARWQ would also point out that "Dry AD" technology may be more appropriate to promote as part of any regional treatment capacity increases, given that it includes both digestion and composting phases while also permitting co-treatment (and thus co-collection) of food and garden waste. This could generate both financial savings and carbon emission reductions compared to separate collection of the two organic materials.</p>

Project ID	Project Description	Lead	Start Date	End Date	Project Status	Project Details	Project Notes
001	Design and development of a new software application	John Doe	2023-01-01	2023-03-31	In Progress	<p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p> <p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p>	<p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p> <p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p>
002	Deployment of a new software application	John Doe	2023-04-01	2023-06-30	Completed	<p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p> <p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p>	<p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p> <p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p>
003	Design and development of a new software application	John Doe	2023-07-01	2023-09-30	In Progress	<p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p> <p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p>	<p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p> <p>The project is currently in the design phase. The design team has completed the initial requirements gathering and is working on the detailed design. The development team has started the initial development work.</p>
004	Deployment of a new software application	John Doe	2023-10-01	2023-12-31	Completed	<p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p> <p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p>	<p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p> <p>The project is currently in the deployment phase. The deployment team has completed the initial deployment and is working on the final deployment. The development team has completed the development work.</p>



Sub-section	Question	Options	Response	NAWDO Response
		Plastic and Metal	Agree	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.
	<p>Could the following recyclable waste streams be collected together from households, without significantly reducing the potential for those streams to be recycled?</p> <p>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.</p> <p>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.</p>	Glass and Metal	Unsure	<p>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.</p> <p>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.</p>
	<p>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 composting?</p>			

[illegible]

Issue	Proposal No.	Proposal Sub-section	Question	Options	Tick Box Answer	NAWDO Response
					Agree.	
39	13	Do you agree or disagree with Proposal 13, particularly on the separation of fibres from other recyclable waste streams and the collection of plastic films?	Agree/Disagree/Not Sure/Don't have an opinion If disagree, please provide the reason for your response			<p>NAWDO support the proposals concerning the collection of fibres and plastic film. However, this is heavily caveated that it must be subject to TEEP and implemented in suitable (realistically deliverable) timeframes. As for many of our members this may not be the best approach in their local area and circumstances.</p> <p>Introducing more separation of dry recyclables should aid quality but at the same time it reduces the ease of the service for residents, so may reduce the overall volume collected/captured for some of our members. Additionally, we are not aware if (or how) the modelling included in the impact assessments accounts for the effects of significant and continuing changes in waste composition (mix of dry materials) seen recently and likely to be seen again going forward as new measures come into force (e.g. DRS and EPR).</p> <p>We also need to be wary of putting in place unnecessary measures based on current operational and processing capacity. For example there is not enough domestic processing mill capacity to accept all the fibres produced by residents and business, so we are reliant on export markets. The next generation of UK mills and pre-processing has not been designed or commissioned as yet. Consequently it is feasible that different approaches could be taken and the current domestic mill limitations/barriers overcome. It is feasible for example that rather than exporting mixed material we may change to exporting a sorted and processed pulp as a standard product to meet demand in overseas mills, closer to production of much packaging material.</p> <p>Keeping guidance up to date, relevant and fully aligned is a challenge that needs to be adequately considered in the design and approach to issuing Statutory and/or Non-Statutory Guidance.</p> <p>Specifically with respect to film whilst some of our members already collect material others do not so we are wary of too quickly increasing supply. As these materials are challenging and more difficult to process and recycle. We need to avoid a cliff edge scenario whereby the duty to collect a specific material comes in before the sorting, processing and recycling capacity is also ready and robust.</p> <p>The consultation and impact assessments also appear to ignore the impact of residual waste capacity on the quantity of dry recyclable (and food and garden waste too) material that can be captured. This is a strong factor affecting the cost and operational considerations does not appear to have been adequately considered. NAWDO does not support statutory guidance that states a minimum frequency for local authorities to collect residual waste. Many local authorities have successfully implemented three or even four weekly residual collections. Additionally, many of our members with fortnightly collections use differing standard issued residual waste bin sizes (for differing household sizes/considerations) which support and fit with the local collection need. As such we believe that setting of residual waste capacity should be done at the local authority level. However, Statutory Guidance could provide on what an authority ought to consider in its decision making process and be purely output rather than input based. Notwithstanding, we need to ensure that the regulations are sufficiently clear, fit and robust to need only minimal Statutory Guidance.</p>
40	14	Which service areas or materials would be helpful to include in non-statutory guidance?	Open answer			<p>Whilst in theory there are many suitable (and worthy) areas that could be good candidates for the application of non-statutory guidance at NAWDO we are mindful of the volume of change proposed. This namely the five other topics in the consistency consultation namely TEEP, compliance and enforcement, dry recyclable minimum service standards, residual waste minimum service standards and food & garden waste minimum service standards are proposed as content for Statutory Guidance. Producing all the Guidance in itself is inherently complex as it will be not be easy to reconcile the many different aspects, and considerations whilst also trying to account for the level of interaction both within the proposal of this consultation and also with aspects of proposals contained within EPR and DRS consultations. There is significant scope for differing timescales that our members will be working too for implementation, highly variable local socio-economic and geographic characteristics alongside potential changes in waste composition and sorting technologies and service standards (e.g. end of waste criteria). Co-ordinating and balancing all of these aspects in order to keep statutory guidance from having conflicting aspects is all inherently difficult as it stands. The proposed Statutory Guidance will need to be flexible enough to accommodate change whilst at the same time being robust and providing clarity and support. It will also need to be written of a nature to ensure that it is fully lawful and correctly aligned with the actual new regulations to reduce the risk of and robustly defend any legal challenges to Government. Therefore with respect to guidance proposed it would be preferable for the Government to focus on the outputs and the approach and factors local authorities should take and consider when determining how they best meet requirements; rather than the inputs.</p> <p>As such NAWDO propose for the time being that no new areas of guidance are brought forward for now but instead resources are concentrated on producing a high quality the required Statutory Guidance. However, we be supportive of agreeing a suitable timescale e.g. 2028 to review this need again, which would give chance for the a period of settlement and stability after implementation of many of the proposed changes.</p>
41	15	Do you have any comments on the recommendations from the review of the Part 2 of Schedule 9 of the Environmental Permitting Regulations?	Open answer			<p>NAWDO 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").</p> <p>However, we'd propose that initially any changes are kept to a minimum in order to primarily ensure that Schedule 9 is aligned and supportive of the reporting aspects required with other proposed changes (e.g. relevant aspects which may arise from the recent consultations related to DRS and EPR). We do not consider that all of the recommendations proposed are essential to the function of Schedule 9 and are more enhancements, NAWDO would welcome the opportunity to work with Government and comment upon the draft legislation.</p>
42	15	If amendments are made to Part 2 of Schedule 9, do you agree or disagree that it is necessary to continue to retain requirements to sample non-packaging dry recyclable materials?	<input type="checkbox"/> Agree <input type="checkbox"/> Disagree <input type="checkbox"/> Not sure / don't have an opinion / not applicable Please provide the reason for your response where possible.		Agree.	<p>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 changes in the structure and approach of MRs nationally would follow changes in waste collection systems and composition. The unintended consequences maybe to roll back or significantly amend the proposed changes, further adding complexity and cost risks arising from repeated contract changes for local authorities. Consideration also needs to be given with respect to any changes regarding mandatory or changes to electronic Duty of Care and avoiding duplication of systems. This means there needs to be clear definitions in place for non-targeted material that is an operational concern but does not impact material quality, and genuine contamination that impacts on material quality. The protocol should not be designed in a way that leaves loopholes that will reduce or remove justifiable payments to local authorities and other waste collectors. So in summary Schedule 9 is in and working, granted with some areas of potential improvement. NAWDO would suggest to Government to minimise amending any part of Schedule 9 that is specifically necessary to ensure that Schedule 9 is aligned with and supportive of the data requirements for EPR.</p>

Issue	Proposal No.	Proposal	Sub-section	Question	Options	Tick Box Answer	NAWDO Response
43	5			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.
44				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 Disposal 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.
					Option 2 Should we discontinue recycling credits and require all two-tier authorities to agree local arrangements? Agree/Disagree/Not sure	Agree	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. 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.
45				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 unilateral manner.

Index	Section	Section-Header	Section-Content	Section-Comments
1	1	1	1	1
2	2	2	2	2
3	3	3	3	3
4	4	4	4	4
5	5	5	5	5
6	6	6	6	6
7	7	7	7	7
8	8	8	8	8
9	9	9	9	9
10	10	10	10	10
11	11	11	11	11
12	12	12	12	12
13	13	13	13	13
14	14	14	14	14
15	15	15	15	15
16	16	16	16	16
17	17	17	17	17
18	18	18	18	18
19	19	19	19	19
20	20	20	20	20
21	21	21	21	21
22	22	22	22	22
23	23	23	23	23
24	24	24	24	24
25	25	25	25	25
26	26	26	26	26
27	27	27	27	27
28	28	28	28	28
29	29	29	29	29
30	30	30	30	30
31	31	31	31	31
32	32	32	32	32
33	33	33	33	33
34	34	34	34	34
35	35	35	35	35
36	36	36	36	36
37	37	37	37	37
38	38	38	38	38
39	39	39	39	39
40	40	40	40	40
41	41	41	41	41
42	42	42	42	42
43	43	43	43	43
44	44	44	44	44
45	45	45	45	45
46	46	46	46	46
47	47	47	47	47
48	48	48	48	48
49	49	49	49	49
50	50	50	50	50
51	51	51	51	51
52	52	52	52	52
53	53	53	53	53
54	54	54	54	54
55	55	55	55	55
56	56	56	56	56
57	57	57	57	57
58	58	58	58	58
59	59	59	59	59
60	60	60	60	60
61	61	61	61	61
62	62	62	62	62
63	63	63	63	63
64	64	64	64	64
65	65	65	65	65
66	66	66	66	66
67	67	67	67	67
68	68	68	68	68
69	69	69	69	69
70	70	70	70	70
71	71	71	71	71
72	72	72	72	72
73	73	73	73	73
74	74	74	74	74
75	75	75	75	75
76	76	76	76	76
77	77	77	77	77
78	78	78	78	78
79	79	79	79	79
80	80	80	80	80
81	81	81	81	81
82	82	82	82	82
83	83	83	83	83
84	84	84	84	84
85	85	85	85	85
86	86	86	86	86
87	87	87	87	87
88	88	88	88	88
89	89	89	89	89
90	90	90	90	90
91	91	91	91	91
92	92	92	92	92
93	93	93	93	93
94	94	94	94	94
95	95	95	95	95
96	96	96	96	96
97	97	97	97	97
98	98	98	98	98
99	99	99	99	99
100	100	100	100	100

Issue	Proposal No.	Proposal	Sub-section	Question	Question contents	Tick Box	Answer	Response	Evidence Needed
Impacts of Consistency	26	Costs and benefits		78	Do you have any comments and/or evidence on familiarisation costs (e.g. time of FTE(s) spent on understanding and implementing new requirements) and ongoing costs (e.g. sorting costs) to households and businesses?			<p>The infrastructure which requires delivering in a short space of time the necessary consents (planning and permitting) resources and funding will be needed.</p> <p>Micro business may well require 1:1 support either via LEP's or through local authorities - need clear 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.</p> <p>Enforcement and engagement for h/hold and business implementation - will require funding. Typically when our members set up major service changes usually requires a dedicated team of at least 8 FTE's, supplemented by from the back office - contact centres, consultation team, communication teams, business intelligence and digital/NCT teams. With the addition of business waste easily need a team of 12 FTE's and working in collaboration with the LEP's.</p> <p>NAWDO believes these are incorrect and using outdated data and assumptions. The £75 million savings assumed in Table 39 we have serious reservations they are achievable as it does not account for the variation in approaches, assumes savings from landfill rather than EFW or other forms of residual waste treatment which are the primary recovery option for IRII waste for our members. There are concerns about the assessment and carbon savings attributed to the mandated free collection of garden waste. Knowledge of charged for services from NAWDO members shows that the carbon inputs related to collections are generally much lower than free services. Fewer vehicles are used in collections; their routes are far more optimised and so the carbon attributed to them is smaller.</p> <p>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, some 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, appreciating that there are always differences in waste composition sampling methodologies. More pertinent is the topography, demographics, housing stock and the time of year the waste composition analysis was completed. NI191 shows that all of the top ten local authorities charge for their garden 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.</p> <p>NAWDO remains firmly of the opinion that given the integrated nature of the Government's proposals in relation to not only Prevention, Consistency, EPR and DRS we have concerns in respect to the overall model being put forward by the Government. The Government's approach has never been tried in the UK especially with funding mechanisms that are untested and opaque at best with significant risks remaining with local authorities. The Government needs to underwrite such risks. The impact assessments make clear DEFRA's assumptions of overall net positive value because of the assumptions it makes about the income from EPR and to a lesser extent DRS.</p> <p>If the Government wants local authorities to move forward and implement to their timeline they must be explicit about their financial modelling and how this will impact local authorities at unitary, upper and lower level. Local authorities who a unitary do not pay recycling credits which the modelling assumes under EPR full net cost modelling.</p>	
	26	Costs and benefits		79	Do you have any comments on our impact assessment assumptions and identified impacts (including both monetised and unmonetised)?				
Impacts of Consistency					Overall, how satisfied are you with our online consultation tool?			Neither satisfied	
Feedback	N/A	Feedback		80	Very satisfied Satisfied			nor dissatisfied	