

**National Assembly for Wales**  
**Environment and Sustainability Committee**  
**RW 45**  
**Inquiry into recycling in Wales**  
**Response from: WRAP Cymru**

**Memorandum by WRAP Cymru (the Waste & Resources Action Programme in Wales)**

**Executive Summary**

1. WRAP Cymru welcomes the opportunity to provide written evidence to the Environment and Sustainability Committee's Inquiry into Recycling in Wales. WRAP Cymru was established in September 2008 and is the Welsh Government's delivery partner for waste and resource efficiency issues. As a member of the Waste Strategy Steering Group, WRAP has actively supported the development of the Welsh Government's overarching waste strategy 'Towards Zero Waste, One Wales: One Planet' and has utilised its expertise in drafting several of the waste sector plans. WRAP Cymru draws on the extensive technical experience across WRAP and has advised the Welsh Government on diverse issues such as end of waste criteria and safety and use of anaerobic digestate. Further information on WRAP Cymru's role and remit is at Annex 1.

2. WRAP Cymru's key priorities are:

- Working with businesses in Wales to drive down the amount of unnecessary packaging and food waste;
- Supporting the development of the infrastructure in Wales for recycling by helping businesses and markets to grow;
- Increasing the diversion of biodegradable waste into quality products such as compost and digestate; and
- Working with the Welsh Government and the WLGA to deliver the Collaborative Change Programme.

3. Our delivery is based on building and understanding the evidence base, then working with partners to address the market failures that prevent the sustainable use of resources. WRAP works efficiently and cost effectively, always seeking to improve the quality of thinking, delivery and outcomes. The Collaborative Change Programme is a Welsh Government programme that has been established to help local authorities play their part in delivering the targets of 'Towards Zero Waste'. WRAP Cymru delivers the programme and in doing so supports authorities in their efforts to meet the targets of the Municipal Sector Plan.

4. We hope that this evidence will be of use to the Committee, and would be happy to expand upon it further in oral evidence if that would be helpful.

**Response to the Call for Evidence**

***Q. To what extent do local authorities' recycling practices align with the Welsh Government's Municipal Waste Sector Plan Collections Blueprint? What are the barriers to, and enablers of, adherence to this Blueprint?***

5. The fundamental aspects of the Collections Blueprint are weekly multi-stream (sometimes referred to as kerbside sort) collections of dry recycling combined with food waste collection, restricted residual waste collection and a chargeable garden waste collection. The 2013/14 audit data shows that:

- All 22 authorities offer food waste collection;
- 11 authorities operate multi-stream collections (with a further 2 in the process of changing to multi-stream), 7 operate a co-mingled service and 4 operate a 2 stream service;
- All authorities have moved to a fortnightly residual waste collection but few have reduced to the 140 litre bin as recommended in the blueprint;
- Most authorities collect paper, card, glass and cans; only 4 do not collect plastic as well, as recommended in the blueprint; and
- 9 authorities charge for the collection of garden waste.

6. There are various barriers to adherence, such as:

- The funding and timing of change: although the Blueprint is a cost-effective system, there may well be an investment required to fund the change. This investment will vary according to the particular point an authority is at in its capital purchase cycle for the procurement of vehicles and containers;
- Co-mingled collections use the same equipment as refuse collections (rear end loading compaction vehicles and wheeled bins or sacks) and the workforce know how to work with this equipment. The change to multi-stream collection can be more challenging;
- More work may be required to make the business case for change to some authorities; and
- Implementing change can be resource intensive, making it a challenge in resource-constrained times.

7. The enablers of adherence to the Blueprint will address some of these issues by:

- Targeting funding in support of delivering the policy;
- Supporting the development of business plans that establish the case for change;
- Providing support to local authorities to address capacity and experience issues related to change management and the mobilisation of new services; and
- Supporting the procurement of capital equipment and the marketing of the collected materials.

***Q. What is the availability of information and guidance to householders about why and how they should be recycling? What are the potential barriers and enablers to improving recycling rates?***

8. According to recent unpublished WRAP research, a majority of the target population stated that they had received information about how to use their recycling kerbside collection in the past year. A smaller proportion reported having received information on their food waste collection service. Responses appeared similar to the results of similar research in 2013,.

9. When asked how confident they were about which materials could be put in their recycling collection and which could not, a large majority were confident or mostly confident.

10. However, comparison with collection services shows that householders' confidence is sometimes misplaced. Some of those respondents with high levels of confidence placed items in their recycling that were not accepted by their local scheme.

11. Our research shows that claimed levels of recycling are high across a range of materials. However, there remains scope for improvement.

12. Additional WRAP research shows that there are four main types of barriers to householders recycling effectively. These types of barriers (which are often mutually interdependent and should be approached in an integrated, context-specific way) are:

- Situational (e.g. inadequate containers or a lack of space);
- Behavioural (e.g. is recycling part of the household routine?);
- Knowledge (e.g. not knowing what to put in each container); and
- Attitudinal (e.g. not believing there is an environmental benefit).

***Q. What have been the reactions of local authorities to the recently published Waste Regulations Route Map? What are the potential impacts and implications of this on recycling practices across Wales?***

13. The Waste Regulations Route Map was published on 22 April 2014 and is hosted on the WRAP website. It was developed by the local authority waste networks in England to raise awareness amongst English local authorities of the Regulations and to provide them with more information on the requirements of the Regulations.

14. Overall industry and local authority reaction to the Route Map has been positive and it has attracted a lot of interest. As part of its development the Route Map was peer reviewed by 20 English local authorities. These authorities covered the range of authority types in England, and represented the broad mix of current service provision as well as a mix of urban and rural authorities. The review tested whether authorities understood the implications of the regulations and how they would apply the Route Map to their own service. The feedback received helped to shape the final version of the Route Map.

15. The Chartered Institution of Wastes Management (CIWM) commented that '*... [the Route Map] offers the opportunity for local authorities to carry out their assessments in a consistent way that will stand up to scrutiny, and a common framework for those who wish to work together and share approaches.*' There have been over 1600 page views on the WRAP website and a recent webinar hosted by WRAP attracted over 130 participants. It is still early days so we are not able to say how many English local authorities are using the Route Map but it is clear that it has filled an important information gap in terms of raising awareness of the Regulations.

16. In terms of implications for recycling practice across Wales, we believe it is unlikely that the Route Map will have a direct impact. It may be helpful to local authorities in Wales in understanding the Regulations, in identifying key questions they may need to consider locally and in providing them with a process to follow to assess their compliance.

17. There are, however, a range of other drivers that are more likely to directly impact on recycling practice in Wales, including the statutory targets, the Collections Blueprint and the Welsh Government's guidance on the separate collection requirements which is out for

consultation currently. The Route Map, like the WLGA Business Planning toolkit, is a tool to help local authorities to systematically review their collection arrangements. It does not tell a council what is best for them to do locally.

***Q. What is the relationship between recycling collection practices and recycling rates?***

18. There are a number of relatively clear factors affecting recycling rates and some that are less obvious. Some of these factors have been identified in some recent unpublished WRAP research:

- There is a clear relationship between the range of materials targeted for collection and the recycling rate achieved: the more materials targeted the higher the recycling rate;
- There is a clear relationship between the restriction of residual waste capacity and the recycling rate achieved;
- Clear communications with householders and periodic reinforcement of messages are important for achieving good recycling rates; and
- Collection service reliability can have a significant impact.

19. Data issues can create interpretational problems. For example, reported recycling rates can vary according to collection system, due to the way material is recorded. Multi-stream collections generally produce good quality materials with minimal contamination, due to the sorting/inspection at the kerbside by collectors. Co-mingled collections are generally carried out using wheeled bins or sacks and thus contaminants are collected alongside the materials. Further to this it is not uncommon for commercial recycling to be co-collected with domestic material in co-mingled systems, potentially further obscuring comparisons.

20. WRAP has produced or commissioned numerous reports over a number of years that compare the cost and performance of different collection systems. Many of these have been for individual authorities throughout the UK, where specific local circumstances can be taken into account. These have been provided to the authorities concerned and WRAP does not put them into the public domain. Some, however, have been more generic studies, including:

- Indicative Cost and Performance report: a generalised report giving indicative data for different categories of authority;
- Kerbside Collection Options – Wales: a report commissioned by the Welsh Government that compared three methods of collection (Co-mingled, two stream and multi-stream). The report considered which of these methods could best deliver the Welsh Government’s sustainability agenda. Six Welsh authorities were modelled and the results were extrapolated to an all-Wales scenario. The study found that, in Wales, multi-stream collections delivered the best results; and
- The Blueprint report: this piece of work has recently been completed and will be published later in the year. It examines performance data from eleven Welsh local authorities operating systems that are close to the Blueprint to determine the likelihood of achieving the Welsh Government’s 70% recycling target.

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**About WRAP Cymru**

21. WRAP Cymru is the Welsh Government's delivery partner for waste and resource efficiency issues. It was established in September 2008 as a programme delivered in Wales by WRAP.
22. WRAP (the Waste & Resources Action Programme) is an independent, not-for-profit company, recognised in the UK and internationally for our expertise in resource efficiency and product sustainability, our leading-edge evidence, our skills and knowledge and our ability to bring people together to solve problems.
23. WRAP's vision is: 'A world where resources are used sustainably.'
24. We occupy a unique space as a trusted interface between Governments, business, local authorities, communities and organisations working for more sustainable resources.
25. WRAP acts as a catalyst, accelerating change in the behaviour of business and communities in ways that neither governments nor individual companies can do, working on their own.
26. We do this through a combination of:
  - Technical knowledge and the ability to apply that knowledge;
  - An ability to forge partnerships and build alliances;
  - Developing insights into business and consumer attitudes and behaviour;
  - Research and a developing evidence base.
27. Our delivery is based on carefully building and understanding the evidence base, then working with partners to address the market failures that prevent the sustainable use of resources. Tackling these, in the right order and cost effectively, is essential to effective market operation and is at the heart of the way WRAP operates.