



**21 June 2021 – PLEASE NOTE THAT THIS IS A WORKING DOCUMENT AND OFFICERS ARE STILL WORKING ON ANSWERS TO SOME QUESTIONS (v4)**

**Consistent Collections Consultation - Full Question List**

**Introduction** (page 16)

Q1 Your Name

[BECKIE BENNETT](#)

Q2 Your email address

[beckie.bennett@ryedale.gov.uk](mailto:beckie.bennett@ryedale.gov.uk)

Q3 Which best describes you?

[Local government – waste collection authority](#)

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

[RYEDALE DISTRICT COUNCIL](#)

Q5 Would you like your response to be confidential?

[NO](#)

DRAFT



**Proposals on separate collection of dry recyclable waste from households**

**Proposal 1 - Collection of dry recyclable materials**

Q6 Do you agree or disagree that local authorities should be required to collect the following dry materials from all households, including flats, by the end of the financial year in which payments to local authorities under Extended Producer Responsibility for packaging commences (currently proposed to be 2023/4 subject to consultation)? (P26)

	<b>Agree</b> –this material can be collected in this timeframe	<b>Disagree</b> –this material can't be collected in this timeframe	Not sure /don't have an opinion /not applicable
Aluminium foil		X	
Aluminium food trays		X	
Steel and aluminium aerosols			Not applicable as already included
Aluminium tubes, e.g. tomato puree tubes		X	
Metal jar lids		X	
Food and drink cartons, e.g. TetraPak		X	

Q7 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. (P27)

The principle of including these materials in the dry recyclable waste collections is supported however the implementation from 2023/24 is not achievable. There are a number of reasons for this as follows:

- RDC operates a source separated kerbside collection service and residents would need to be provided with an additional box for the additional materials which would increase the number of boxes from 3 to 4 and space/storage would be a potential issue



- Additional vehicles would need to be purchased to ensure there was sufficient capacity to collect the additional materials
- Adding these materials will reduce the quality of the materials currently recycled and therefore the resale value will also reduce representing a loss of income
- There will be an additional costs to process the additional materials
- There is currently not the infrastructure in place to separate out the additional materials as part of existing processes therefore reliance on a third party would be required and the associated costs of this are not known
- There are also limited markets for these additional materials and it is difficult to assess the value of these materials until the market develops
- The additional materials are also likely to increase contamination as they are likely to have food residue on them as they are very difficult to clean ie foil after been used to cook food and puree tubes are impossible to clean before being placed into the recycling stream
- Investing in new kerbside vehicles and equipment when a deposit return scheme is also potentially likely to be introduced would be an investment that may not be necessary as drinks containers would potentially be diverted from the kerbside collection into the DRS therefore reducing recycling presented at the kerbside
- A composition analysis undertaken in 2020 indicated that these additional materials would add only 1% to current recycling rates as they are fairly light and the contamination factor could actually reduce the recycling rates being achieved already

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? (P28)

*Collection contracts*

*Sorting contracts*

*Materials Recovery Facility (MRF) infrastructure capacity*

*Cost burden*

*Reprocessing*

*End markets*

*Other (please specify)*

*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.*



*Ryedale District Council is the waste collection authority and North Yorkshire County Council is the waste disposal authority. There is currently not the infrastructure capacity in North Yorkshire to process these additional materials therefore it is difficult for a timescale to be given in our response.*

- 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)? (P28)

**Agree – cartons should be included in the plastic recyclable waste stream.**

*Disagree – cartons should be included the paper and card recyclable waste stream.*

*Not sure / don't have an opinion / not applicable.*

*Please provide the reason for your response and state if there are any unintended consequences that we should consider.*

The principle of adding other materials into the recyclable waste stream is supported however as before, existing rounds do not have capacity to collect the additional tonnages and there is not currently the infrastructure in place to sort these materials. Investment in vehicles to handle the additional volumes would be required and the issue of reducing the quality of current recyclables already collected at the kerbside has the potential to reduce recycling rates not increase them.

We do have concerns about the communication issues this will cause in that residents tend to think of cartons as 'paper/card' based products and may contaminate the paper/card material collection stream.

- 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? (P28)

*No increase*

*0–9% increase*

*10–20% increase*

**21-100% increase**

*Not sure / don't have an opinion / not applicable*

*Please provide the reason for your response.*

Using the current processing costs per tonne of £75.33 and the data from a waste composition survey undertaken in 2020 additional processing costs are



forecast to be in the region of £124,000 increasing the 21/22 budget from £66,000 to £190,000 pa

**Proposal 2 - Collection of plastic films from households**

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?

(P29)

*Agree*

*Disagree*

*Not sure / don't have an opinion / not applicable*

*If you disagree, please provide the reason for your response.*

We agree in principle to the collection of plastic films if the sorting infrastructure is in place. This infrastructure currently does not exist so we would want to be sure that this will be in place before agreeing to the collection of this material.

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? (P29)

*Collection contracts*

*Sorting contracts*

*Materials Recovery Facility (MRF) infrastructure capacity*

*Cost burden*

*Reprocessing*

*End markets*

*Other (please specify)*

*Please provide the reason for your response and provide evidence to support your answer.*

*Ryedale District Council is the waste collection authority and North Yorkshire County Council is the waste disposal authority. There is currently not the infrastructure capacity or capability in North Yorkshire to process these additional materials therefore renegotiating their existing contract would potentially have an impact on achieving this timescale.*

**Proposal 3 & 4 – Food waste**

Q13 Do you agree or disagree that the above should be collected for recycling within the food waste stream? (P35)

*Agree*

*Disagree*



*Not sure / don't have an opinion / not applicable*

*If you disagree, please provide the reason for your response and specify which materials should be included or excluded in this definition.*

### Garden waste - what can I recycle?

- ✓ Grass Cuttings
- ✓ Windfalls (fruit from garden)
- ✓ Cut Flowers / Plants
- ✓ Weeds/ Turf / Hay / Straw
- ✓ Hedge Clippings
- ✓ Leaves and Bark

- ✗ Meat/ Fish/ Cooked Food
- ✗ Dog or Cat Wastes
- ✗ Pre-treated wood
- ✗ Stones and rubble
- ✗ Disposable nappies
- ✗ General household rubbish



We agree in principle with the criteria for food waste, but further work needs to be undertaken to better define food waste for example there needs to be clear guidance around cooked and uncooked food eg windfall fruits we collect with garden waste

There are concerns about tea bags containing plastic and some AD plants may not want these to pass through their systems. Although passing PAS levels it is not desirable to have a situation where plastics are being spread on land.

Q14 Which parts of Proposal 4 do you agree or disagree with? (P36)

	Agree	Disagree	Not Sure or Don't have an opinion
Local authorities already collecting food waste separately must continue to collect this material for recycling at least weekly from the 2023/24 financial year	X		
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	X		
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	X		



<p>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 soon as contracts allow, with an end date to meet this requirement between 2024/25 and 2030/31</p>		<p>X</p>	
<p>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</p>	<p>X</p>		

*Please provide any views on the end date for these obligations and any evidence on associated costs and benefits.*

*The ability to achieve these deadlines is dependent on North Yorkshire County Council as disposal authority having the infrastructure in place for collection authorities to implement food waste collections therefore there needs to be flexibility in the regulations to allow for this.*

Q15 Some local authorities may experience greater barriers to introducing a separate food waste collection service to all household properties, including flats, by the dates proposed above. For what reasons might it be appropriate for these collection services to begin after this date? (P37)

*Collection contracts*

*Treatment contracts*

*Cost burden*

*Reprocessing*

*End markets*

*Other (please specify)*



Procurement of food waste collection vehicles and equipment is likely to be an issue as the demand is likely to be very high leading to delays in production

Ryedale District Council is the waste collection authority and North Yorkshire County Council is the waste disposal authority. Food waste is already separated however the existing infrastructure does not have the capacity in North Yorkshire to process the additional tonnages materials and therefore renegotiating their existing contract or implementing new infrastructure potentially has an impact on achieving this timescale.

*If you have disagreed with any of the proposed implementation dates above, please provide examples of circumstances where it would be appropriate for this collection service to begin after these proposed dates and any supporting evidence where possible.*

The logic of changing an existing collection system where garden waste and food waste area already collected and composted is not supported on the grounds of financial and environmental impacts ie new vehicles and additional fuel consumption to achieve the same objective.

#### **Proposal 5 - Caddy Liners**

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. (P39)

**Agree**

*Disagree*

*Not sure / don't have an opinion / not applicable*

*The use of caddy liners is shown to increase recycling levels of food waste, however, it is essential that caddy liners are recyclable as introducing an additional material into the collection system would not be consistent with the objectives we are aiming to achieve. Ongoing Government funding should be provided to cover the cost of the liners including delivery resources and costs.*

#### **Proposal 6 – Biodegradable and compostable packaging**

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. (P42)

It is essential that the new labelling under EPR clearly states that materials are either recyclable or not recyclable to make recycling for residents and businesses easy. Until compostable and biodegradable materials can be recycled it is important that the labelling clearly states that it is not recyclable.

Further work is therefore necessary to ensure that the criteria can be met to classify compostable and biodegradable materials as recyclable to stimulate investment in appropriate infrastructure to enable this to be separately collected through recyclable waste streams as this is a confusing message for residents and business at present.

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? (P42)

*Agree*

*Disagree*

*Not sure / don't have an opinion / not applicable*

*Please provide any evidence where possible and explain any advantages and disadvantages.*

#### **Proposal 7 – Definition of Garden Waste**

Q19 Do you agree or disagree with the materials included in and excluded from this description of garden waste? (P46)

*Agree*

*Disagree*

*Not sure / don't have an opinion / not applicable*

*If you disagree, please provide the reason for your response and specify which materials should be included or excluded in this definition.*

*Include - windfall fruits, hay, straw, bark & turf – These materials are collected now without any issues*

*Exclude – should include cooked food waste, disposable nappies and general household rubbish*

#### **Proposal 8 –Free garden waste collection**



Q20 Given the above costs, recycling benefits and carbon emissions reductions, do you agree or disagree that local authorities should be required to introduce a free minimum standard garden waste collection (240 litre containers, fortnightly collection frequency and throughout the growing season<sup>45</sup>), if this is fully funded by Government, and if authorities remain free to charge for more frequent collections and/or additional capacity? (P47)

Agree

Disagree

Not sure / don't have an opinion / not applicable

*Please provide any comments or evidence on the costs and benefits presented above.*

'Growing Season'

When Ryedale's free kerbside garden waste collection service for all was first introduced it operated all year round but the tonnes of garden waste collected and the benefit in terms of increased recycling rate was not enough to offset the cost of collection and the CO<sub>2</sub> emissions created. We introduced a 3 month closedown (Dec, Jan & Feb) – residents either storing garden waste in the bin until collections recommenced or taking to the HWRCs. During the 3 month closedown, our garden waste collection crews support the recycling and residual collection teams due to the increase in waste & recycling collected over Christmas. If we had to deliver an all year round service extra costs would be incurred by the other collection services. The 'growing season' needs to be clearly defined.

25% increase in garden waste tonnage shifted from residual waste  
We have evidence that when Ryedale DC introduced garden waste charging – the tonnages collected reduced by 30%. However, if a free service for all is re-introduced we would disagree that we would see the same increase in tonnages. A recent (2020) residual waste composition survey showed an average of 5.82% of the residual waste surveyed contained garden waste. Therefore, we would disagree that this extra tonnage would be shifted from residual waste. When implementing charging we ran a home composting campaign with subsidised bins and the take up exceeded expectations. Also residents take garden waste free of charge to household waste recycling centres. Incidences of fly-tipped garden waste remain low in the area. We believe the extra tonnage collected would mainly shift the garden waste from home composting – the most environmentally friendly way of disposing of garden waste and HWRCs.

By charging for the service separate from Council Tax, residents can make a choice whether they wish to pay for and receive this service. Under a free service, some citizens without gardens would be paying for a service through taxation that they would not be receiving and subsidising the cost of the



service for citizens with gardens. Citizens will pay for a free service through taxation of some form so there will be no savings, in fact, it will cost more as extra vehicles, staff and fuel will be required to deliver a free service for all citizens.

Therefore, Ryedale DC does not support the introduction of a free fortnightly garden waste service.

**Proposal 9 – Other garden waste collection options**

Q21 How likely are the following options to support the above policy aims? (P48)

	Very Likely	Likely	Unlikely
Provide updated guidance on reasonable charges for garden waste.		Lower price may encourage more to participate	
Issue clear communications to non-participating households.		Only 5.82% of residual waste is garden waste – so we believe our communications re home composting and taking extra garden waste to HWRCs already works. Flytipped green waste is minimal in the area.	
Support on increasing home composting (e.g. subsidised bin provision).	Home composting should be the first option for garden and some food waste. Preventing the waste should be the priority rather than		



	increasing the processes around the treatment of garden waste. <input type="checkbox"/>		
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Q22 Do you have any further comments on the above options, or any other alternatives that could help to increase the recycling of garden waste and/or reduce the quantity of garden waste in the residual waste stream? Please provide supporting evidence where possible. (P48)

A capped price between £18-£30 would not cover the cost of collection and the difference would need to be met through new burdens funding.

We do not believe the use of public funds to provide free garden waste services could be considered value for money. By charging for garden waste services we have been able to keep the garden waste collection service operating, in the face of public sector funding cuts. It has also meant the funds are available to provide other essential services.

**Proposal 10 – Exemptions on separate collection of two recyclable streams**

Q23 Could the following recyclable waste streams be collected together from households, without significantly reducing the potential for those streams to be recycled? (P50)

	Agree	Disagree	Not Sure / Don't have an opinion
Plastic and metal	X		
Glass and metal			X

*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.*

*Our existing kerbside collection service already collects plastic and metal together and current recycling performance evidences the compatibility of recycling these streams together*

Q24 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? (P50)



Not answered

**Proposal 11 – Exceptions on two or more streams collected together**

Q25 Do you have any views on the proposed definition for ‘technically practicable’? (P54)

No – the definition proposed is reasonable.

Q26 Do you agree or disagree that the proposed examples cover areas where it may not be ‘technically practicable’ to deliver separate collection? (P54)

Agree

Disagree

Not sure / don’t have an 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.*

Q27 What other examples of areas that are not ‘technically practicable’ should be considered in this proposal? Please be as specific as possible. (P54)

The types of vehicles being used could mean it is not technically practicable to have separate collection of the recyclable waste streams ie if twin stream vehicles are in use there is not the option to add additional materials without comingling or make significant investment in new vehicles.

Q28 Do you agree or disagree that the proposed examples cover areas that may not be ‘economically practicable’ to deliver separate collection? (P55)

Agree

Disagree

Not sure / don’t have an 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.*

Q29 What other examples of ‘economically practicable’ should be considered in this proposal? Please be as specific as possible. (P55)

Availability of end markets should be considered for the collected materials  
Sourcing of vehicles at the same time could cause supply issues  
Cost of additional fleet, containers, crews, staff, stickering and communication



Q30 Do you have any views on what might constitute 'excessive costs' in terms of economic practicability? (P55)

It will be hard to define 'excessive costs' as it will be different for each local authority. We have concerns that if the definition of excessive costs is not met that the local authority will have to subsidise the difference between the EPR payment and the extra cost of recycling the materials. Especially, as it is proposed that the income from the sale of the materials will part fund the collection – fluctuating markets, as seen recently during the pandemic, have made it hard for local authorities to forecast and budget an expected income. Adding different materials to the waste stream will devalue the product and make it harder to find a market, resulting in local authorities paying for the treatment of the recycling which should be funded by the producer.

Q31 Do you have any views on what should be considered 'significant,' in terms of cases where separate collection provides no significant environmental benefit over the collection of recyclable waste streams together? (P56)

We would argue that any change of process that increases CO2 emissions over the current methodology should be classed as significant.

Significant will be different for each local authority – if it is dealt with on a case by case basis do we end up with an overall situation whereby the collections across the country are not consistent and thus the aim of the legislation is not fulfilled.

Q32 Do you agree or disagree that the proposed examples for 'no significant environmental benefit' are appropriate? (P56)

**Agree**

*Disagree*

*Not sure / don't have an 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.*

Q33 What other examples of 'no significant environmental benefit' should be included in this proposal? Please be as specific as possible. (P56)

- Carbon impact
- Additional vehicles



- Balance between the quality in comingled and vehicle miles in collecting separately for possibly no or little increase in quality.

**Proposal 12 – Compliance and enforcement**

Q34 Do you agree or disagree that local authorities should only be required to submit a single written assessment for their service area? (P58)

**Agree**

*Disagree*

*Not sure / don't have an opinion / not applicable*

*If you disagree, please provide the reason for your response.*

Q35 What other ways to reduce the burden on local authorities should we consider for the written assessment? (P58)

Given that the requirement to complete a written assessment is a new requirement and therefore a new burden, the additional funding to cover the extra resources that will be needed to complete these assessments must be provided by Government. Workshops/training events would be useful in advance of the deadline for the written statements to be submitted. This will ensure that the information required is correct and meets requirements.

Q36 What factors should be taken into consideration including in the written assessment? For example, different housing stock in a service area, costs of breaking existing contractual arrangements and/or access to treatment facilities. (P58)

- Rurality and urbanisation of local authority, type of properties and demographic of population.
- Carbon impact.
- MRF Infrastructure needed for sorting and availability of end markets
- Extra space required for additional vehicles
- Resident consultation
- Health & Safety Assessment
- Operational Costs

Q37 Do you agree or disagree that reference to standard default values and data, which could be used to support a written assessment, would be useful? (P59)

*Agree*

**Disagree**

*Not sure / don't have an opinion / not applicable*



*If you disagree, please provide the reason for your response.*

*Using default values can make an assessment easier and quicker but the ability to use our own data and evidence in support of the statement would be beneficial especially if our intelligence differs from the default values*

Q38 Do you agree or disagree that a template for a written assessment would be useful to include in guidance? (P59)

**Agree**

Disagree

Not sure / don't have an opinion / not applicable

*If you disagree, please provide the reason for your response.*

**Proposal 13 – Minimum service standards of dry recyclable materials**

Q39 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? (P61)

Agree

**Disagree**

Not sure / don't have an opinion / not applicable

*If you disagree, please provide the reason for your response.*

Plastic Film

We do not believe it is viable to collect plastic film by 2026/27 due to a lack of sorting and end market capacity.

Fibres

Cartons in plastic and metal stream again we have concerns regarding the availability of sorting facilities available by 2023/24

**Proposal 14 – Non-statutory guidance**

Q40 Which service areas or materials would be helpful to include in non- statutory guidance? (P63)

- Communications best practice and sharing of good ideas.
- Clinical waste collections
- Bulky waste collections
- Bring sites for household & business waste
- Enforcement for non-compliance



**Proposal 15 – Review of Environmental Permitting Regulations**

Q41 Do you have any comments on the recommendations from the review of the Part 2 of Schedule 9 of the Environmental Permitting Regulations? (P64)

Q42 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? (P64)

*Agree*

*Disagree*

*Not sure / don't have an opinion / not applicable*

*Please provide the reason for your response where possible.*

**Proposal 16 – Recycling Credits**

Q43 Do you agree or disagree that provision for exchange of recycling credits should not relate to packaging material subject to Extended Producer Responsibility payments? (P68)

*Agree*

*Disagree*

*Not sure / don't have an opinion / not applicable*

*Please provide the reason for your response.*

*On the basis that EPR payments will replace recycling credits for packaging materials however recycling credits will still need to be paid for materials that are not packaging collected in the kerbside recycling scheme ie greetings cards, magazines & newspapers etc*

Q44 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: (P68)

- 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?
- Option 2 Should we discontinue recycling credits and require all two-tier authorities to agree local arrangements?

	Agree	Disagree	Not Sure / Don't have an opinion / not applicable
Option 1	X		
Option 2			X



- Q45 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. (P68)

Continuing with the current recycling credit payments would be a simpler way forward as this is an established process which works however calculating the payments will need further work to ensure changes in collections are reflected in the calculations.

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**Proposal 17 – dry recycling collections from non-household premises**

Q46 Do you agree or disagree that waste collectors should be required to collect the following dry materials from all non-household premises for recycling, in 2023/24? (P76)

	<b>Agree</b> –this material can be collected in this timeframe	<b>Disagree</b> –this material can't be collected in this timeframe	Not sure / Don't have an opinion /not applicable
Aluminium foil		X	
Aluminium food trays		X	
Steel and aluminium aerosols		X	
Aluminium tubes, e.g. tomato puree tubes		X	
Metal jar lids		X	
Food and drink cartons, e.g. TetraPak		X	

*If you disagree with the inclusion of any of the materials above in the timeframe set out, please provide the reason for your response and indicate which dry recyclable material you are referring to.*

The principle of including these materials in the dry recyclable waste collections offered to businesses is supported however the implementation from 2023/24 is not achievable.

Incentives to encourage collection authorities to offer the same recycling options to businesses that are currently offered to households already should be the focus initially so that there is a phased approach to changes which will increase recycling rates at a manageable and affordable pace.

Once the factors below are addresses consider introducing the additional recyclable materials to the recycling collection streams.

The reasons for not being able to achieve the proposed timescales mirror the reasons given for households as follows:



- RDC operates a source separated kerbside collection service to households only with limited recycling offered to businesses
- Commercial waste rounds would need to be reoptimised to introduce recycling for all recyclable materials to businesses which would inevitably require the purchase of additional vehicles to ensure there was sufficient capacity to collect the additional materials
- Businesses would also need to be provided with equipment for all the recyclable materials which would increase the numbers of containers at each site and space/storage would be a potential issue
- Adding these materials will reduce the quality of the materials currently recycled and therefore the resale value will also reduce representing a loss of income
- There will be an additional costs to process the additional materials
- There is currently not the infrastructure in place to separate out the additional materials as part of existing processes therefore reliance on a third party would be required and the associated costs of this are not known
- There are also limited markets for these additional materials and it is difficult to assess the value of these materials until the market develops
- The additional materials are also likely to increase contamination as they are likely to have food residue on them as they are very difficult to clean ie foil after been used to cook food and puree tubes are impossible to clean before being placed into the recycling stream
- Investing in new vehicles and equipment when a deposit return scheme is also potentially likely to be introduced would be an investment that may not be necessary as drinks containers would potentially be diverted from the recycling collections into the DRS therefore reducing recycling presented for collection
- A composition analysis undertaken in 2020 indicated that these additional materials would add only 1% to current recycling rates as they are fairly light and the contamination factor could actually reduce the recycling rates being achieved already

Q47 Some waste collectors may not be able to collect all the items in the dry recyclable waste streams from all non-household municipal premises in 2023/24. Under what circumstances might it be appropriate for these collection services to begin after this date? (P76)

*Collection contracts*

*Sorting contracts*

*Materials Recovery Facility (MRF) infrastructure capacity*

*Cost burden*



Reprocessing

End markets

Other (please specify)

Please provide the reason for your response and indicate how long waste collectors require before they can collect all these materials.

Ryedale District Council is the waste collection authority and North Yorkshire County Council is the waste disposal authority. There is currently not the infrastructure capacity in North Yorkshire to process these additional materials therefore it is difficult for a timescale to be given in our response.

**Proposal 18 – Collection of film from non-household premises**

Q48 Do you agree or disagree that collections of plastic films could be introduced by the end of 2024/25 from non-household municipal premises? (P77)

Agree

Disagree

Not sure / don't have an opinion / not applicable

If you disagree, please provide the reason for your response and any evidence as to why this would not be feasible.

Ryedale District Council is the waste collection authority and North Yorkshire County Council is the waste disposal authority. There is currently not the infrastructure capacity or capability in North Yorkshire to process these additional materials therefore renegotiating their existing contract would potentially have an impact on achieving this timescale.

Q49 Do you have any other comments on this proposal? For example, please specify any barriers that may prevent collectors delivering these services. (P77)

**Proposal 19 – on-site food waste treatment technologies**

Q50 Do you agree or disagree with Proposal 19? (P79)

Agree

Disagree

Not sure / don't have an opinion / not applicable

It is agreed in principle that food waste that is not properly recycling or fully recovered on the site of production should be separately collected for recycling or recovery elsewhere however we cannot comment on the practicalities or associated impacts arising from the implementation of on-site food waste treatment technologies.



Q51 Do you have any other comments on the use of these technologies and the impact on costs to businesses and recycling performance? (P80)

Not answered

**Proposal 20 – reducing barriers to non-household waste recycling**

Q52 What are the main barriers that businesses (and micro-firms in particular) face to recycle more? (P81)

	Large barrier	Some barrier	Low/no barrier
Communication		X	
Financial	X		
Space	X		
Engagement		X	
Drivers to segregate waste		X	
Location		X	
Enforcement			X
Variation in bin colours and signage		X	
Contractual			X
Staff/training			X
Other			

*If you have selected other above, please specify.*

*Please provide any comments on how these barriers can be overcome.*

[Extra resources](#)

[Capacity to address these issues and to support businesses in understanding the options around disposal of the waste they create would overcome some of these issues](#)

**Proposal 21 – exemptions and phasing on micro-firms**

Q53 Should micro-firms (including businesses, other organisations and non-domestic premises that employ fewer than 10 FTEs) be exempt from the requirement to present the five recyclable waste streams (paper & card, glass, metal, plastic, food waste) for recycling? Please select the option below that most closely represents your view and provide any evidence to support your comments. (P83)

*Yes – all micro-firms should be exempt from the requirement – Option 1*



*No – but all micro-firms should be given two additional years to comply with the new requirements in the Environment Bill (i.e. compliant in 2025/26) – Option 2*

*No – all micro-firms should be required to present these waste streams for recycling, from the ‘go live’ date in 2023/24*

Q54 Should any non-household municipal premises other than micro-sized firms be exempt from the requirement? Please provide evidence to support your comments. (P84)

*All businesses should be mandated to recycle however collection authorities need to work with businesses to offer workable solutions especially where storage is the limiting factor ie explore options for shared recycling facilities for businesses*

**Proposal 22 – Waste franchising/zoning**

Q55 Which recyclable waste streams should be included under a potential zoning scheme? (P88)

	Agree	Disagree	Not Sure / Don't have an opinion / not applicable
Dry recyclable waste streams	X		
Food waste	X		
Other items e.g. bulky office waste	X		

Q56 Which of the below options, if any, is your preferred option for zoning/collaborative procurement? Please select the option that most closely aligns with your preference. (P89)

- Encouraging two neighbouring businesses to share the same containers under contract*
- Encouraging businesses to use shared facilities on a site/estate*
- Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in)*
- Co-collection – the contractor for household services also deliver the non-household municipal services*
- Framework zoning – shortlist of suppliers licensed to offer services in the zone*
- Material specific zoning – one contractor delivers food, one for packaging, one for refuse collection services*
- Exclusive service zoning – one contractor delivers the core recycling and waste services for the zone*
- None of the above*



Q57 Do you have any views on the roles of stakeholders (for example Defra, the Environment Agency, WRAP, local authorities, business improvement districts, businesses and other organisations and chambers of commerce) in implementing a potential zoning or franchising scheme? For example, do you think there could be roles for one or more of these organisations in each of the following activities: (P89)

- *Procurement*
- *Scheme design*
- *Administration and day to day management*
- *Enforcement*
- *Business support*
- *Development of tools and guidance*
- *Delivery of communications campaigns*
- *Any other activities (please specify)*

*If you think that there is a role for any other stakeholders, please specify. Please provide explanations where possible to support your above response.*

Q58 Do you have any further views on how a potential waste collection franchising / zoning scheme could be implemented? (P89)

Q59 Do you have any views on how Government can support non-household municipal waste producers to procure waste management services collaboratively? This could include working with other stakeholders. (P90)

Q60 Which type(s) of business support would be helpful? (Select any number of responses) (P90)

*1:1 support*

*National /regional campaigns*

*National guidance and good practice case studies*

*Online business support tools (e.g. online calculators and good practice guidance)*

*Other (please specify)*

Q61 Are there any barriers to setting up commercial waste bring sites, and do you find these sites useful? (P90)

*Availability of suitable land – the principle of commercial waste bring site is supported and it is known that businesses already use bring sites for households.*

**Proposal 23 – exemptions to separate collection from non-household premises**



Q62 Could the following recyclable waste streams be collected together from non-household municipal premises, without significantly reducing the potential for those streams to be recycled? (P91)

	Agree	Disagree	Not Sure / Don't have an opinion
Plastic and metal	X		
Glass and metal			X

*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.*

*Our existing kerbside collection service already collects plastic and metal together and current recycling performance evidences the compatibility of recycling these streams together and this would be applicable to collections from businesses*

**Proposal 24 – exemption on two or more recyclables from non-household premises**

Q64 Do you have any views on the proposed definition for ‘technically practicable’? (P93)

*Rather than imposing cost and bureaucracy on individual businesses could these definitions be sorted out at a franchise zoning level as an exercise for all types of business.*

Q65 Do you agree or disagree that the proposed examples cover areas where it may not be ‘technically practicable’ to deliver separate collection? (P94)

**Agree**

*Disagree*

*Not sure / don't have an opinion / not applicable*

*If you have disagreed with any of the above, please say why and indicate which example you are referring to.*

Q66 What other examples of areas that are not ‘technically practicable’ should be considered in this proposal? Please be as specific as possible. (P94)

- Social and economic demographics of an area
- Health and safety guidelines and risk assessments for kerbside sort
- HSE guidance - collectors should lift as little as possible.
- Access issues should be considered for example narrow roads, joint congested service areas, parking causing access issues.
- Vehicle availability – long lead-in times for purchasing.



- Depot space – for vehicles, transfer of materials, containers
- Electric vehicles charging points required for electric vehicles.
- Additional vehicles requiring more staff, shortage in frontline staff and trained drivers and cost of training.
- Permitting restrictions, licensing, maintenance, maintenance crews (for vehicles)
- Type of office/retail stock and access
- SME space for bins.
- Businesses are unwilling to participate.

Q67 Do you agree or disagree that the proposed examples cover areas that may not be 'economically practicable' to deliver separate collection are appropriate? (P94)

Agree

Disagree

Not sure / don't have an opinion / not applicable

*If you have disagreed with any of the above, please say why and indicate which example you are referring to.*

Q68 What other examples of 'economically practicable' should be considered in this proposal? Please be as specific as possible. (P95)

Q69 Do you have any views on what might constitute 'excessive costs' in terms of economic practicability? (P95)

The term 'excessive costs' does cause concern – it implies that there has to be a high level of extra cost incurred before an exemption can be claimed – this could mean that the council will have to stand the costs between EPR and the extra cost.

Any additional costs incurred are deemed excessive as this may divert funds away from other services that we provide. After 10 years of funding cuts any rise in costs would be deemed excessive.

Q70 Do you have any views on what should be considered 'significant,' in terms of cases where separate collection provides no significant environmental benefit over the collection of recyclable waste streams together? (P95)

The term significant all suggests a large threshold before an exemption can be claimed.



Q71 Do you agree or disagree that the proposed examples for 'no significant environmental benefit' are appropriate? (P95)

**Agree**

*Disagree*

*Not sure / don't have an opinion / not applicable*

*If you have disagreed with any of the above, please say why and indicate which example you are referring to.*

Q72 What other examples of 'no significant environmental benefit' should be included in this proposal? Please be as specific as possible. (P96)

- Carbon impact
- Additional vehicles
- Balance between poor quality in co-mingled and vehicle miles in collecting separately.

**Proposal 25 – compliance and enforcement**

Q73 What ways to reduce the burden on waste collectors and producers should we consider for the written assessment? (P97)

Standard template – preferably on line

Ideally done at a franchise/zoning level to reduce the burden on individual businesses.

Q74 We are proposing to include factors in the written assessment which take account of the different collection requirements, for example, different premises within a service area. What other factors should we consider including in the written assessment? (P98)

Q75 Would reference to standard default values and data, that could be used to support a written assessment, be useful? (P98)

**Agree**

*Disagree*

*Not sure / don't have an opinion / not applicable*

*If you disagree, please provide the reason for your response.*

Q76 Do you agree or disagree that a template for a written assessment would be useful to include in guidance? (P98)

**Agree**

*Disagree*

*Not sure / don't have an opinion / not applicable*



*If you disagree, please provide the reason for your response.*

- Q77 Do you agree or disagree that the proposed approach to written assessments and non-household municipal collections will deliver the overall objectives of encouraging greater separation and assessing where the three exceptions (technical and economical practicability and environmental benefit) apply? (P98)

**Agree**

*Disagree*

*Not sure / don't have an opinion / not applicable*

### **Proposal 26 – costs and benefits**

- Q78 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? (P103)

New burdens need to take account of set up costs and upfront transition costs associated with mobilisation as well as ongoing revenue and capital costs. It is difficult to quantify the FTE time that will need to be spent on familiarisation costs at this stage however it is inevitable that there will be a considerable amount of spent understanding and implementing the new requirements including communications to residents and businesses to explain what is changing before it actually does and also delivering equipment in readiness for the new collections.

- Q79 Do you have any comments on our impact assessment assumptions and identified impacts (including both monetised and unmonetised)? (P103)