

Consultation on consistency in household and business recycling collections in England

About you

1. What is your name? **Councillor EJ Poll**

2. What is your email address? **wastestrategy@lincolnshire.gov.uk**

This is optional, but if you enter your email address then you will be able to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.

3. Which best describes you?

Please tick only one option. If multiple categories apply to you please choose the one which **best describes you** and which you are representing in your response. (Required)

- Local Authority**
- Waste management company
- Business representative organisation/trade body
- Product designer
- Manufacturer
- Distributor
- Retailer
- Reprocessor
- Community group
- Charity or social enterprise
- Independent consultancy
- Academic or researcher
- Individual
- Other (please provide details ...)

4. If you are responding on behalf of an organisation, what is its name? **Lincolnshire Waste Partnership**

5. Would you like your response to be confidential?

No

If you answered 'Yes' above, please give your reason:

Part 1 Measures to improve the quantity and quality of household recycling collected by local authorities

Consultation questions on dry recycling

Proposal 1 – We propose that all local authorities in England should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

Q5 Setting aside the details of *how* it would be achieved, do you agree or disagree with the proposal that local authorities should be required to collect a set of core materials for recycling?

- Agree – local authorities **should** be required, to collect a core set of materials
- Disagree – local authorities **should not** be required, to collect a core set of materials
- Not sure/don't have an opinion

Q6 We think it should be possible for all local authorities to collect the core set of materials. Do you agree with this?

- Agree
- Disagree – If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

Q7 What special considerations or challenges might local authorities face in implementing this requirement for existing flats and houses in multiple occupancy?

There is evidence that recycling performance in flats is lower than with kerbside collections and in order to address this, many authorities with a high proportion of flats have needed to introduce specific schemes and programmes to increase performance. One example of this is the £5 million Flats Recycling Programme introduced by LWARB in 2010. Therefore in order to introduce a mandatory core set of recyclable materials for flats and HMOs, it is clearly evidenced that additional funding and support would need to be provided to Local Authorities. This will allow LAs to work to deliver the requirement for a core set of materials by the implementation of successfully evidenced programmes rather than to simply pay lip service to the notion which would fail to increase the recycling rates. The implementation in new and purpose built flats, where consideration can be given to storage of containers, will also increase the ability to successfully introduce a core set of materials.

Challenges that the partnership have identified include;

- Lack of physical space for containers for separate materials, both inside flats and in communal areas
- High contamination levels in communal bins
- More resources may be required to monitor these. Consideration as to whether there can be use of HMO Licence conditions for enforcement
- Better enforcement powers required for communal areas
- Where flats are above business spaces – special consideration will be required as there will be commercial and domestic bins will be in use

Q8 What other special considerations should be given to how this proposal could apply to flats? Please provide additional information on your answer.

Whilst the partnership agrees that in principle the idea of a core set of material is a good idea and meets some of our own strategy objectives, we are clear that there are some key areas that need consideration in order to make this option viable. These include;

- Whether there should be any exceptions, where the implementation of the core set would be unworkable; such as where space for containers is unavailable
- Whether kerbside is always the best option, can the offer of bring banks still allow LAs to meet the requirement to collect core materials
- Suitable infrastructure would need to be in place to ensure that all materials that are collected are able to be recycled
- Suitable funding support would be required for LAs to introduce this to all types of properties
- Whether separate recycling performance rates should be reported for flats and HMO compared to kerbside collections

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- High contamination levels in communal bins
- More resources may be required to monitor these. Consideration as to whether there can be use of HMO Licence conditions for enforcement
- Better enforcement powers required for communal areas
- Where flats are above business spaces – special consideration will be required as there will be commercial and domestic bins will be in use

Q9 Do you have any other comments to make about Proposal 1? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

Whilst the partnership agrees that in principle the idea of a core set of material is a good idea and meets some of our own strategy objectives, we are clear that there are some key areas that need consideration in order to make this option viable. These include;

- Whether there should be any exceptions, where the implementation of the core set would be unworkable; such as where space for containers is unavailable
- Whether kerbside is always the best option, can the offer of bring banks still allow LAs to meet the requirement to collect core materials
- Suitable infrastructure would need to be in place to ensure that all materials that are collected are able to be recycled
- Suitable funding support would be required for LAs to introduce this to all types of properties
- Whether separate recycling performance rates should be reported for flats and HMO compared to kerbside collections
- Consistency, wherever possible, will help to reduce confusion for the public and support the required infrastructure to recycle materials collected
- Enforcement powers must be available to ensure that there are powers available to enact where residents are not adhering to the requirements
- Funding for education/communications support will be essential

Proposal 2 – We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

Q10 Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paper and card	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bottles	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic pots tubs and trays	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steel and aluminium tins and cans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q11 What, if any, other products or materials do you believe should be included in the core set that all local authorities will be required to collect?

	This should be included in the core set from the start of Consistency	This should be included from the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Food and drinks cartons	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plastic bags and film	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other materials (please specify)		Textiles		

Q12 If you think any of these or other items should or should not be included in the core set immediately please use the box below to briefly explain your view.

The requirement to collect materials must be supported by the sufficient infrastructure and markets to recycle them. This is especially the case for plastic pots tubs and trays which should only be included if it can be demonstrated that the materials they are made from: a) are simple to sort at MRF; and b) have a recycling market. They must also be supported by ongoing communication and education so that the public are confident in what can be recycled.

Q13 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

As the partnership have already highlighted, the requirement to collect materials must be supported by the sufficient infrastructure and markets to recycle them. It is also noted that without public pressure to create a market, many items can be incinerated or sent to landfill where a market could otherwise be created. An example of this is the recent pressure for crisp packets to be recycled. This is also a good example of where public confusion is created when media promote that there is a market for recycling and materials are assumed suitable for their home recycling collections where only specialised recycling collections are available. Therefore the partnership would like to see a phasing in of materials to the core set, once there is a suitable market for them, together with the appropriate communications messages locally and nationally to reduce confusion and ensure high engagement. Alongside a market and infrastructure requirement, the need for suitable resource and financing requirements for LA's must be provided in order to collect additional materials.

In some areas where a market already exists but addition of a material to the core set is done to capture the materials that are lost to incineration or landfill, it will be imperative to ensure that communication and education are forefront in providing the public with the information as to what is required and why, as well as considering the impact on existing collections. In particular this refers to textiles where the Environmental Audit Committee has worked on the sustainability of the fashion industry and the amount of textiles that are needlessly incinerated or sent to landfill where markets already exist. However, introducing these to the core set of materials may increase recycling, where ease of disposal in home collections are able to remove this material from refuse collections, alongside education of why it is important to do so. However, the impact to charities of introducing it as a core collection material would need to be considered alongside the environmental impacts of removing textiles from incineration and landfill. Similarly, with the collection of core materials, consideration should be given as to whether kerbside is always the most appropriate method of collection and whether bring banks, such as those for textiles, should continue to be the main method of collection in certain circumstances.

The decision to add extra material should only be done if there is a thorough review in line with proposal 3.

Q14 Do you have any other comments to make about Proposal 2?

It is essential that the requirement to collect materials must be supported by the sufficient infrastructure and markets to recycle them. They must also be supported by ongoing communication and education so that the public are confident in what can be recycled.

Proposal 3 – We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that a) evidence supports the benefits, b) there are viable processing technologies for proposed materials, c) there are sustainable end markets, d) local authorities would not be adversely affected, including financially.

Q15 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- Yes
- No
- Not sure/don't have an opinion

Q16 Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

Yes – but I would also add some (please specify which conditions you believe should be added ...)

- No – some/all should be removed (if some please specify below)
- No – some should be added and some should be removed (please specify which ...)
- Not sure/don't have an opinion

Q17 Do you have any other comments to make about Proposal 3?

- "Review" should also mean that items might be **removed** from the list sometimes if they no longer meet the defined criteria.
- Review should not be **too** often as this causes confusion for householders.
- Condition d) needs to include consideration of impacts on bin/vehicle/service capacity of changes in recycling mix.
- Consideration needs to be given to length of lead in times for LA's and the cost impacts
- Communication and education are fundamental to any changes
- Adequate resource must be made available for the above

Consultation questions on separate food waste collection

Proposal 4 – By 2023 we propose to legislate for local authorities to provide all kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners.

Q18 Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) services to be changed only as and when contracts allow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) providing free caddy liners to householders for food waste collections	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q19 Are there circumstances where it would not be practical to provide a separate food waste collection to kerbside properties or flats.

- Yes (if yes please provided further details below)
 No
 Not sure/don't have an opinion

Q20 Do you have any other comments to make about Proposal 4 including on circumstances where it may not be practical to provide a separate food waste collection?

The partnership disagrees with the proposal, as it stands in full, to legislate for local authorities to provide all kerbside properties and flats with access to at least a weekly separate collection service for food waste, including provision of containers and liners.

We wish to clarify, however, that:

- We agree in principle with the **idea** of food waste collections
- We agree that some of the proposed details (see Q18) are reasonable for **most** properties (e.g. weekly, separate)
- We **disagree**, however, that those details are right for **all** authorities/properties.
- We therefore **cannot** agree that those details should be made **mandatory** for "**all** kerbside properties and flats".

There are a number of reasons for this including;

- The requirement to provide the service to all properties does not take into account for properties that are fundamentally difficult to collect food waste from such as flats and HMOs. These properties have little storage area for caddies and food bins internally and externally and are evidenced as having poor participation.
- The rural nature of properties in Lincolnshire means that weekly food waste collections could be environmentally and economically unviable
- Mixed collections (with garden waste) may be the best way to make food collections work in some areas/situations, particularly in very rural communities, although some of our partners would disagree with that
- Tourist locations are unsuitable for caddies to be on street for large part of day and during peak times additional collection vehicles will add to already busy roads
- Local Authorities should be given the opportunity to choose areas and/or property types suitable for weekly food waste collections based on the above considerations, it should not be a mandate for all properties
- If food waste collections are to be introduced, then liners may well be a key requirement to maximise the take-up and environmental benefits. However, whilst evidence shows that liners can increase participation, they should not be mandatory. This should be left to each local authority to decide because:
 - Some "biodegradable" liners are not compostable and are shown to contain micro plastics that can find their way into water streams. Caddie liners would need to be manufactured to the correct environmentally friendly specification.
 - Some bio plants remove liners before their main process, so universal provision of them would be adding to waste streams.
 - Some partners have expressed concern that liners are costly and could be difficult to provide to households.
 - Once you have given liners, removal of them would be difficult, whereas commencing a scheme without them would create a norm for users.
 - Where liners are not used, the communication and education that would need to go with the introduction of a food waste scheme should include the environmental reasons as to why liners are not being used.

Proposal 5 – We will provide funding and support to local authorities to help put in place the necessary collections infrastructure.

Q21 If you are responding on behalf of a local authority, what kind of support would be helpful to support food waste collection? (tick as many as apply)

- I am not responding on behalf of a local authority
- Specific financial support** (please specify)
- Procurement support**, (e.g. free advice on renegotiating contracts; centralised purchasing of containers)
- Communications support**, (e.g. free collateral that can be adapted and used locally)
- Technical support**, (e.g. free advice from a consultant about round re-profiling)
- Other (please specify ...)

Q22 Do you have any other comments to make about Proposal 5?

The partnership feels that any move towards introducing mandatory food waste collections must be done with full and fair funding for local authorities for collection, disposal and infrastructure (caddies and vehicles). The partnership recently commissioned work from WRAP regarding the impact of introducing food waste in the authorities of the partnership and this clearly showed that the financial impacts would be crippling.

WRAP evidence also confirms that the success of any food waste trial is reliant upon ongoing communication and education. Without this, participation falters and schemes become unworkable. Ongoing funding for this would be critical. The partnership feels that national campaigns could work to increase the success of food waste schemes including the message of minimisation.

Proposal 6 – We believe it would be desirable for local authorities that have contractual commitments with IVC facilities, which needs mixed garden and food waste, to require separate presentation of food waste but then be able to mix it with garden waste for treatment purposes. This is because our evidence shows that separate presentation of food waste leads to higher yields.

Q23 What are your views on this proposal?

- This could cause issues with the public who want transparency. Material they have separated should not be mixed afterwards as this could lead to trust issues over other material streams.
- If this happens, there should be resources allocated to deliver a targeted and ongoing communications messages including a focus on where the waste ends up
- Retaining comingling may be a cheaper collection option in some circumstances/areas, but that shouldn't be an issue provided government would **fully** fund **separate** collections
- Impact on frequency of garden waste collection would need to be considered
- Impact on the cost of caddies to unnecessarily separate waste as it is later mixed would need to be considered

Consultation questions on collecting garden waste

Proposal 7 – We are seeking views on whether households generating garden waste should be provided with access to a free collection service. If introduced this this would be a minimum fortnightly collection service of a 240-litre capacity container (either bin or sack). Local authorities may provide additional capacity or more frequent services and would be able to charge for this additional provision

Q24 Which aspects of the proposal do you agree or disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) a free garden waste collection for all households with gardens	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) A capacity to 240l (bin or other container eg sack)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) A fortnightly collection frequency (available at least through the growing season)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iv) ability to charge households for additional capacity/collections/containers over the set minimum capacity requirement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(v) this new requirement to start from 2023 (subject to funding and waste contracts)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q25 Do you have any other comments to make about Proposal 7?

The partnership does not agree with the proposal to introduce free fortnightly garden waste collections to household's producing garden waste. The reasons for this include;

- This proposal goes against the producer pays principle. Why should those without a garden pay for others who do (via council tax)?
- This proposal goes against waste hierarchy principles as charging promotes minimisation & home composting.
- This proposal encourages regular collection of part-filled bins and increases the amount of vehicles travelling the country and therefore carbon impact.

Consideration should be given to;

- What will be classed as a garden? Why issue a bin to people with a small yard, will garden boxes be eligible? Cannot provide this to everyone who wants one – reasonableness needs to be considered.
- Should charge for disposal be considered?
- Does an opt-in service (and thus charged) support waste hierarchy and environmentally friendly objectives?
- How it might work in areas where comingling with food waste is the best value option?
- Whether there is sufficient national AD capacity to deliver both food and garden waste mandates.

Consultation questions on separate collection to improve quality

Proposal 8 – In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality. We propose to amend the law to clarify this and will include guidance in our proposed statutory guidance on minimum service standards to help local authorities and waste operators in decision making on separate collection.

Q26 Do you agree the proposed approach to arrangements for separate collection of dry materials for recycling to ensure quality?

- Yes
- No (why ...?)
- Not sure/no opinion/not applicable

The partnership does not agree to the proposed statutory guidance on minimum service standards in regards to separate collections. This is because;

- There are properties for which separate collections are not suitable, such as where there is not room for separate receptacles, tourist areas, terraced houses, flats and HMOs
- The partnership has WRAP evidence that the introduction of separate collections is expensive

Q27 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide evidence.

Circumstances that may prevent separate collections include;

- Inability to store multiple containers
- Carbon impact of additional vehicles required for separate collections
- Occupational health of crews collection heavy glass and/or paper receptacles
- Additional increase in the duration of rounds
- Impact of noise due to glass only collections (for residents and crew)
- Public perception – having to do our work for us by sorting materials
- Huge financial impact on authorities – evidence from wrap report
- Clarity on what is plastic – label of materials (definitions would need to be clear). Labelling would need to be made very clear (as part of other consultations)
- Logistics of storage and transportation of multiple waste stream and ensuring there are markets for these
- The impact and role of "TEEP"

Q28 Do you have any other comments to make about Proposal 8?

The following must be considered and financial impacts resolved before introducing separate collection requirements;

- Inability to store multiple containers
- Carbon impact of additional vehicles required for separate collections
- Occupational health of crews collection heavy glass and/or paper receptacles
- Additional increase in the duration of rounds
- Impact of noise due to glass only collections (for residents and crew)
- Public perception – having to do our work for us by sorting materials
- Huge financial impact on authorities – evidence from wrap report
- Clarity on what is plastic – label of materials (definitions would need to be clear). Labelling would need to be made very clear (as part of other consultations)
- Logistics of storage and transportation of multiple waste stream and ensuring there are markets for these
- The impact and role of "TEEP"

Consultation questions on bin colour standardisation

Proposal 9 – Assuming that we progress with proposals for a core set of materials that must be collected for recycling, the government welcomes views on whether England should move to standardised waste container colours for those materials, together with residual waste, food and garden waste.

Q29 Do you agree or disagree with this proposal?

- Agree – bin colours **should** be standardised for all waste streams
- Agree in part – bin colours should be standardised for some waste streams but not all (specify which ...)
- Disagree** – bin colours **should not** be standardised for any waste streams
- Not sure/no opinion/not applicable

Q30 There would be potential for significant costs from introducing standardised bins colours from a specific date. What views do you have on a phased approach or alternative ways to standardising the colours of containers for different materials?

- Phased approach 1 – as and when waste contracts are renewed
- Phased approach 2 – as and when old/unserviceable bins are replaced
- Other ways** please specify...

The partnership cannot see a workable approach to overcome the expense and unnecessary confusion arising from the changeover.

There would also be a huge environmental impact with the bins that are no longer required as they are the wrong colour as well as with manufacturing new ones. We would also question as to whether there is capacity to make new ones in UK?

The partnership does wonder whether there should be some considering as to a national standard of bin (regardless of colour).

Q31 Do you have any other comments to make about Proposal 9?

The partnership feels that whilst consistency would be nice in an ideal world, we cannot see a workable approach to overcome the expense and unnecessary confusion arising from the changeover. It is thought that it may not work as some authorities will collect separately and others mixed as not "feasible" or needed to "improve quality" (see proposal 8) therefore there would be no way to standardise colours for bins that collect mixed waste. The confusion that would arise from the changes would likely make it more difficult for residents than it currently is.
Would it be more prudent to focus on more innovative ideas (i.e. underground bins)

Consultation questions on service standards

Proposal 10 – We are proposing to prepare statutory guidance on minimum service standards to which local authorities will be required to have regard. The detail of this guidance will be consulted upon in our second consultation

Q32 Do you agree or disagree with the proposal to publish statutory guidance?

- Agree – government **should** publish statutory guidance
- Disagree** – government **should not** publish statutory guidance
- Not sure/no opinion/not applicable

Q33 We propose reviewing the guidance every few years, revising it as required and then allowing sufficient lead-in time to accommodate the changes. Do you agree or disagree with this timescale?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable**

Q34 Subject to further analysis and consultation we propose to use the guidance to set a minimum service standard for residual waste collection of at least every alternative week Do you agree or disagree with this proposal?

- Agree
- Disagree – it should be **more often**
- Disagree – it should be **less often**
- Not sure/no opinion/not applicable**

Q35 Do you have any other comments to make about Proposal 10?

The partnership does not agree that statutory guidance on minimum service standards to which local authorities will be required to have regard should be introduced. This is because

- It takes away from the idea of localism and councils being able to do what is best for their residents
- Any fixed residual frequency flies in the face of working hard to minimise it, and could mean collecting from near-empty bins.
- Changes to guidance should only be made where there is a clear reason for it. Any change could incur significant expense and could cause confusion for the public.
- **If** there is guidance, there must be a clear commitment to fund any changes resulting from it. In order to avoid penalising early-adopters, there should also be funding to support services which **already** exceed an agreed baseline.

If introduced, service standards need to complement the waste hierarchy.

Consultation questions on communicating about recycling

Proposal 11 – We will continue our support for Recycle Now and the tools produced by WRAP to help local authorities to communicate effectively on recycling.

Q36 Do you have any comments to make about Proposal 11?

The partnership agrees that moving towards consistent services makes national campaigns more effective and that campaigns should be national and local to get public engagement and should be ongoing and funded.

Q37 What information do householders and members of the public need to help them recycle better?

- Make them care – e.g. the impact of not recycling (Blue Planet)
- What they need to do to avoid those consequences
- Communications need to include an element of myth-busting to help to restore public faith in councils' motivation for their actions – e.g. councils are not just out to make money out of recycling
- Focus on waste minimisation and re-use
- Make packaging clearer
- Clear and consistent understanding of where and why it's not working i.e. research, key messages
- Support charities – other options out there (i.e. textiles, books etc)

Proposal 12 – We will work with local authorities and others to improve transparency of information available to householders on the end destination for household recycling.

Q38 Do you agree or disagree with this proposal?

on this

- Agree** – government **should** work with local authorities and other stakeholders
- Disagree – government **should not** work with local authorities and other stakeholders on this
- Not sure/no opinion/not applicable

Q39 Do you have any other comments to make about Proposal 12?

- The partnership does agree based on the following;
- Agree provided the plan is genuinely to "work with local authorities" rather than simply imposing an additional duty.
 - Is this information not already provided by local authorities and available via Wastedataflow?
 - Link the information through to demonstrate that producers are meeting their responsibilities.
 - Working with other stakeholders, businesses and EA to make system work
 - Adequate resources are provided

Consultation questions on end markets

Proposal 13 – (No specific proposal text)

Q40 Please use this space to briefly explain any comments you have on the issues discussed in this section.

Developing a stronger UK market for recyclable materials is essential as it ties in with:

- The proximity principle
- Making the UK a circular economy
- Producer responsibility

Consultation questions on non-binding performance indicators

Proposal 14 – We propose developing a set of non-binding performance indicators for local authorities to use to monitor waste management and recycling and to highlight where services can be improved to delivery higher recycling and minimise waste. In addition to the headline household recycling rate for the local authority we would propose 4 additional indicators covering the yields of dry recycling, food waste for recycling, garden waste for recycling, and residual waste. We would also work with local authorities to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

Q41 Do you agree or disagree that introducing non-binding performance indicators for waste management and recycling is a good idea?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q42 Do you agree or disagree that the proposed indicators are appropriate?

- Agree
- Disagree (please expand ...)
- Not sure/no opinion/not applicable

Q43 Do you have any comments to make about Proposal 14 or examples of indicators currently in use that may be of assistance?

The proposed "yield" measures shouldn't have targets set because, as argued elsewhere in these consultation documents:

- They are weight-based rather than looking at environmental benefits.
- They could hinder the application of the Waste Hierarchy. Recycling is good but reuse and minimisation are better
- They could promote quantity over quality of material collected.
- Difficult to measure/compare for opt-in services.

However, measuring "yield" can be helpful as a contextual measure, so not appropriate to have a target.

Targets can drive adverse behaviours, but consideration should be given to how the performance information will be used nationally as benchmarks.

Consultation questions on alternatives to weight-based metrics

Proposal 15 – We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these as set out in the Resources and Waste Strategy.

Q44 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q45 Do you agree that these alternatives should sit alongside current weight-based metrics

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q46 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

- Carbon footprint – A tool to calculate this from readily-available local authority data would be helpful and ensure consistent methodology.
- Customer satisfaction with services?
- Value for money? – Contextual to collection and disposal methods

Consultation questions on joint working

Proposal 16 – We want to support and enable greater collaboration and partnership working between authorities where this would accelerate the move to consistent collections and improve recycling and delivery of services.

Q47 Do you agree that greater partnership working between authorities could lead to improved **waste management and higher levels of recycling**?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q48 What are the key barriers to greater partnership working?

- Differing organisational priorities
- Budget pressures
- Restrictions of existing contracts & service models
- Differing socioeconomics of neighbouring authorities
- Different issues in rural/urban areas

Q49 How might government help overcome these barriers?

- Drive towards consistency but ensuring legitimate local needs/differences are considered.
- Find ways (financial rewards?) to promote a one-nation mentality providing services for all the public rather than just for each authority's residents.
- Shared responsibility for providing the best environmental option, regardless of borders.
- Provision of model documentation – terms of reference etc (two tier areas)

Q50 Do you have any other comments to make about Proposal 16?

Lincolnshire Waste Partnership agrees with the principle of greater collaboration and partnership working between authorities and has seen the benefits of this through its own partnership. However, the LWP would like to raise that any partnership must make note of the areas of differences between authorities and work to address these and ensure local requirements are always considered

Support should be given to cross-boundary collection arrangements where this is the most practicable method of collection.

Part 2 Measures to improve recycling by businesses and other organisations that produce municipal waste

Consultation questions on measures to increase recycling from business and other organisations that produce municipal waste

Proposal 17 – We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to legislate so that these establishments have to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste operators.

Q51 Do you agree or disagree that businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q52 Which of the 3 options do you favour?

- Option 1 mixed dry recycling and separate glass recycling; no food waste collected for recycling
- Option 2 mixed dry recycling and separate food recycling; no glass recycling
- Option 3 mixed dry recycling, separate glass recycling, separate food recycling
- Something else (please expand ...)
- Not sure/no opinion/not applicable

Q53 We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on where this may not be practicable for technical, environmental or economic reasons

- Yes – it should be practicable to segregate waste for recycling in all circumstances
- No – some exceptions are needed for particular circumstances (please provide examples below)
- Not sure/no opinion/not applicable

Exceptions should include small businesses, especially in certain locations where storage of waste receptacles are not possible

NB – When we say 'small businesses' we do not mean the standard definition of SME (which accounts for the vast majority of businesses in Lincolnshire) but rather businesses which are genuinely small, possibly 'micro businesses'.

Q54 Should some businesses, public sector premises or other organisations be exempt from the requirement?

- Yes (which ones and why ...?)
- No
- Not sure/no opinion/not applicable

Exemptions should include small businesses, especially in certain locations where storage of waste receptacles are not possible

Q55 Do you have any other comments to make about Proposal 17? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

The partnership feels that whilst it's important not to negatively impact on small businesses, the legislation needs to include as many organisations as reasonably possible – e.g. charities & schools.
Exceptions should be based on yield of waste rather than size of business – e.g. a café may have a lot of waste whilst consideration should be given to storage or multiple waste receptacles.
There may need to be a review of definitions in controlled waste regulations – e.g. status of "air b&b" properties & caravans.

Proposal 18 – Where a business, public body or other organisation produces sufficient quantities of food waste we propose to legislate for this to be separated from residual waste and arrangements made for it to be collected and recycled.

Q56 Do you agree or disagree that businesses, public bodies or other organisations that produce sufficient quantities of food waste should be required to separate it from residual waste so that it can be collected and recycled?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q57 Do you agree or disagree that there should be a minimum threshold, by weight, for businesses public bodies or other organisations to be required to separate food waste for collection?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q58 Do you have any views on how we should define 'sufficient' in terms of businesses producing 'sufficient' quantities of food waste to be deemed in scope of the regulations?

Q59 Do you have any views on how we should define 'food-producing' businesses?

Q60 In addition to those businesses that produce below a threshold amount of food waste, should any other premises be exempt from the requirement?

- Yes (which ones and why ...?)
- No
- Not sure/no opinion/not applicable

Q61 Do you have any other comments to make about proposal 18?

How would a minimum threshold be measured and enforced? Is it more practical and easier to enforce on all?

Proposal 19 – If the proposals above are adopted, we would like to support businesses, public sector and other organisations to make the transition. In particular we would like to find ways to reduce the impact on small and micro businesses.

Q62 What are your views on the options proposed to reduced costs?

There should be no different equivalent burdens to that of householders.

Q63 Are there other ways to reduce the cost burden that we have overlooked?

Q64 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

Business waste data

Proposal 20 – As part of implementing consistency, we will work with waste producers and waste collectors in the non-household municipal sectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to consultation.

Q65 Do you have any views on whether businesses and other organisations should be required to report data on their waste recycling performance?

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

Q66 Do you have any other comment on Proposal 20?

This is a large quantity of waste, making a significant contribution to overall municipal waste, and thus to the national target, so should be subject to the same reporting requirements as household waste.