

Appendix 3

Summary of Consistency in Recycling Response – Now Simpler Recycling

October 2023

The key points of the response are listed below, including their potential impact and a timeline that includes all 3 policy areas.

Key Points Confirmed	Areas of Ambiguity / Potential Concern	Impact / Consideration for LWP
Confirmation of the materials to be collected which include a wider range of materials (full list in appendix a). These will be required by 31 st March 2026 to align with FW, EPR and DRS	Unclear if the market for these exists currently and therefore the pressure it will place on disposal contracts	Impact to disposal contract of new materials that require collection/disposal. Potential financial impact.
All recycling materials proposed to be eligible to be co-mingled and no need for TEEP or separate collections	This is subject to consultation as part of statutory guidance and therefore not confirmed yet. This will be a Secretary of State exemption from the EA21. It is also unclear how this will align with EPR and its requirements for efficient and effective and the funding councils will receive	Minimal collection or disposal impact. Need to consider this in line with EPR as more details emerge to ensure improved recycling rates and lower contamination to support maximum EPR funding
Food Waste and Garden Waste proposed as an exemption to enable them to be co-collected. This will need to be weekly, as per the EA21 and will need to be free	How many disposal facilities can handle the co-collection and delivery of these materials	Provides partnership with another option to consider, however would need to consider frequency requirements and loss of ability to charge for GW and disposal outlets.

Key Points Confirmed	Areas of Ambiguity / Potential Concern	Impact / Consideration for LWP
Plastic Film collection required by end of March 2027. Biodegradable plastics will not be included	Unclear if the market for these exists currently and therefore pressure it will place on disposal contracts and also the best method in which to collect films is still unclear in the sector	Impact to disposal contract of plastic film requiring collection/disposal. Potential financial impact.
Weekly Food Waste Collections must be implemented (including flats) by 31 st March 2026 for households. No decision has been made on caddy liners and the provision of these	Still awaiting further details on new burdens, but response makes it clear that only reasonable costs will be covered. There will be 3 pots of funding, transitional capital (£295m), transitional revenue and ongoing revenue, amount for these tbc. But the latter will be outside of this spending review. The transitional funding will only be available to those who do not already collect FW. Payments will be made via Section 31 grants and then become part of Local Gov Settlement. There is reference to new burdens considering the savings of FW, so likely a reference to WDAs and their costs/new burdens funding formula	Further clarity is required regarding what will be deemed as reasonable costs and what will be covered and what savings will be considered in formula for new burdens, likely to impact WDA. Costs for not getting TA will not be covered in new burdens. Clarity on caddy liners and who will pay for these is needed as this will be a big cost. The capital funding for vehicles and receptacles will be available to spend from 1 st April 2023. New burdens only available after duty is in place. The Section 31 grants for capital will be with councils this financial year. There is no funding for depot or WTS infrastructure. Consideration now required for disposal contracts and delivery of material from WCA. Government are clear that they are pro AD treatment.
Food Waste (not weekly) and all recycling changes (same materials as for households) must be implemented by businesses by March 2025	The response states this is because commercial contracts can flex easier and no commercial EPR currently	There will likely be a negative impact to councils that currently provide commercial collections that now have 2 differing dates to introduce FW and may be unable to compete commercially. There may be less impact regarding the differences in dates for recycling implementation.

Key Points Confirmed	Areas of Ambiguity / Potential Concern	Impact / Consideration for LWP
Garden Waste collections may continue to be charged and no cap to be imposed currently. Local authorities will be required to provide a service where it is requested and new requirements must be implemented by 31 March 2026	The economic and environmental case is not strong enough to proceed with the proposal to require waste collection authorities to introduce a free minimum garden waste collection service. Carbon saving per pound spent was not supportive of this policy. Service is both required and optional, needs further clarity. Gov gathering further evidence on other options to reduce GW in residual – assume this could be composting etc.	Positive news for partnership to allow for local decisions and cost recovery of service. Requirement to provide a GW service could be difficult in hard-to-reach areas
A minimum fortnightly residual collection is being consulted upon in Statutory Guidance. Looking to end 3 or 4 weekly residual collections	No new burdens for this. Actively encouraging more frequently than fortnightly. Seems at odds with evidence that less frequent residual collections include the success of FW collections. Currently only out to consultation	Higher frequency of collections are more expensive to run and introduction of weekly food waste would be more successful with reduced residual collections.

