

Briefing Report for Scrutiny

CARDIFF COUNCIL CYNGOR CAERDYDD

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DRAFT RECYLING STRATEGY 2021-25

Reasons for this Report

1. To provide members of the relevant Scrutiny Committee with information in relation to a matter to be considered at a future meeting of Cabinet. The information within this report will form the basis of that future report to Cabinet to seek approval:
 - for the consultation on the draft recycling strategy 2021-25: 'Make a change to save our planet – Reduce, Re-Use, Recycle' and associated resident survey on improving recycling performance.
 - To support a pilot of 3 stream segregated collection for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags.
 - To retain the Recycling Centre booking system and 'no black bag' policy.
 - To cease the provision of red and white striped bags for residents living in properties unable to store 140litre residual bins on the property and allowing residents to present three refuse bags from 2022.

Background

2. Cardiff's recycling performance has remained static at around 58% since 2018. As such, Cardiff has failed to meet the 2019/20 statutory recycling target of 64% recycling.
3. Cardiff currently provides the following recycling and waste services for households across Cardiff:
 - Weekly food waste collections
 - Weekly green bag collections for comingled recycling
 - Fortnightly garden waste collections in summer
 - Fortnightly residual waste collections

- Fortnightly Hygiene collections (on request)
 - Bulky Waste collections (on request)
4. The Recycling, Preparation for Re-use and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011 imposes a requirement for the Council to measure the tonnage of waste and recycling of both households and commercial business serviced by Cardiff Council.
 5. The Regulations allow the Minister responsible for recycling performance to impose a fiscal penalty on Local Authorities who fail to meet recycling performance targets.
 6. The statutory target is to achieve a recycling performance of 64% between 2019/20 and 2023/24. This increases to a recycling performance of 70% from 2024/25 onwards. Cardiff's recycling performance was 58.10% in 2019/20 and 55.80% in 2020/21 compared to a target of 64%. The 2020/21 figure is low due to changes made to the way in which we collected and processed waste during the first 3 months of the Covid-19 pandemic (Qtr 1 of 2020/21). Qtr 4 of 2020/21 shows recycling at 60.55%, as by this time, we had put safety measures in place to enable us to resume processing of the recyclable materials at Lamby Way.
 7. WG has not enforced financial penalties for failing to meet statutory targets. However, there is a requirement for immediate intervention to ensure targets are met moving forwards.
 8. Cardiff has a high number of people living in flats and Houses of Multiple Occupation (HMOs) at circa 30% of total properties. These types of properties have a disproportionately high level of non-participation in recycling and where recycling does take place, there are high levels of contamination within the co-mingled recycling.
 9. A recent compositional analysis exercise in Cardiff has shown significant amounts of recyclable material in both kerbside and communal residual / black bag waste.
 - 51.9% of communal (flats) collected residual waste contained target recyclable material (21% dry recycling, 35% food, garden waste)
 - 42.5% of kerbside (household) collected residual waste contained target recyclable material (8.7% dry recycling, 39.4% food)
 10. The compositional analysis identifies contamination of dry recycling was 41.4% for communal collections and 23.7% for kerbside collections, including 4% solid food waste and 4.9% liquid food / drink waste.
 11. The compositional analysis also estimates the food collection service captures 62% of all food with high levels of food waste present in residual / black bag waste.

12. Cardiff Council operates an in-house trade waste service. The current level of recycling performance of 34% across the trade sector is significantly lower than the residential recycling performance. Trade waste represents circa 9% of the total of waste collected by Cardiff Council and the poor performance of this sector drags down the Council's overall recycling performance. Nonetheless, the Council remains committed to providing a trade waste service and to working with Welsh Government to improve performance in this area. The imminent introduction of dedicated statutory targets for trade waste by Welsh Government will help to accelerate an improvement in recycling performance.

Draft Recycling Strategy 2021-25; 'Make a change to save our planet – Reduce, Re-use, Recycle'

13. The draft Recycling Strategy 2021-25 'Make a change to save our planet – Reduce, Re-use, Recycle' is Appendix A.
14. The strategy aligns to the Corporate Plan 2020-2023 objective to make Cardiff a world-leading recycling city, alongside headline action statements from the Beyond Recycling national strategy. It will ensure the Council continues to improve recycling services for residents and businesses.
15. The main objectives for the strategy are as follows:
 - Improve material quality
 - Increase recycling participation and capture of priority materials
 - Increase opportunities for communities and residents to recycle
 - Make use of all available data, to develop targeted actions
 - Reduce single use plastics
 - Encourage and support the prevention, reuse and repair of materials
 - Contribute towards developing a circular economy within Wales
16. Alongside the aims and objectives of the Strategy, there are a number of core actions, including expanding recycling services for residents, which will help us to deliver recycling performance improvements. These are outlined in Table 1 within the draft Recycling Strategy 2021-25.
17. The draft Recycling Strategy 2021-25 will be published for public consultation with a resident survey. This will support the development of the final recycling strategy 2021-25 and the development of actions to deliver improvements to improve reduction, re-use and recycling.

Support a pilot of 3 stream segregated collection for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags

18. WRAP benchmark Welsh Authority performance in relation to a number of areas to promote recycling performance improvements. When reviewing Cardiff, the following was evidenced:
 - Kerbside residual waste above average per household: 249kg/hh/yr vs. national average of 227kg/hh/yr and best performing at 193kg/hh/yr

- Lowest amounts of dry recycling per household: 134kg/hh/yr compared to national average of 173kg/hh/yr, and best performing 206kg/hh/yr
 - Very high MRF reject – 8% of total waste arisings against national average of 2%.
19. High level analysis from 2019/20 identified 10,000t of material lost to reject. This could translate into 3% increase in recycling performance, assuming 60% of this could be recycled.
 20. Over the last decade, cleaning up recyclable materials has been key to increasing performance but also securing end markets for recyclable materials.
 21. Welsh Government, through the Collaborative Change Programme (CCP), has supported Cardiff to undertake service modelling in order to determine the best option for Cardiff. Numerous collection methods were explored and narrowed down using the Kerbside Analysis Tool (KAT). The options reviewed were the current method; kerbside sort (the required benchmark) and a three-stream collection method where glass and paper are kept separate.
 22. The model showed the kerbside sort and three-stream collection method as options which would support improving performance with a need for limited increases in current budgets. However, the kerbside sort model has not been selected as a pilot due to concerns relating to the length of time this vehicle would remain in residential streets.
 23. The pilot will be for the 4,000 properties (households with frontages only) where the bottle and jar pilot took place and will utilise the following:
 - 1 x 90L red reusable sack for containers (plastic bottles, tubs, cans, tins and aerosols)
 - 1 x 90L blue reusable sack for paper and card (fibres)
 - 1 x blue caddy for glass
 24. The recyclable material collected will be treated separately to the Dry Mixed Recycling to provide a good insight to the improvements in recycling performance and quality of recyclable material received in comparison to the compositional analysis of the Dry Mixed Recycling.
 25. A pilot is required to provide real information on the recycling performance achieved and the operational costs to deliver a service across Cardiff. This can then be utilised to develop a robust business case whilst addressing any concerns or limitations.
 26. The pilot objectives are to:
 - Measure material volumes to help determine future vehicle split
 - Monitor materials collected to assess whether contamination reduces and quality increases
 - Measure public satisfaction with reusable sacks
 - Identify any impact on Street Scene cleanliness

- Identify appropriate round sizes for a 'one pass' three-stream recycling vehicle
 - Identify resources and costs required for change
27. The One Planet Cardiff Strategy has set out an objective to reduce single use plastics (SUP's), specifically green recycling bags. The use of reusable bags will address the 24 million single use green bags per annum for dry mixed recycling (DMR).
28. Over £800,000 is spent on purchasing and distributing green recycling bags each year and this budget will be utilised within the business case to fund any proposed changes.

Retaining the Recycling Centre booking system and 'no black bag' policy

29. The mass of material deposited for both recycling and disposal at Cardiff's Recycling Centres totalled 33,373 tonnes in 2019/20, totalling approximately 19.5% of Cardiff's total waste. The recycling recovery rate was 67%.
30. This is lower than the average recovery rate of around 80% seen across Wales as a whole during 2019/20 and below the 70% expected performance set out in 'Towards Zero Waste'.
31. Cardiff introduced recycling officers to support black bag splitting on site in 2019/20 but only minor improvements were achieved, with a significant amount of resource required to manage the bag splitting.
32. The Covid-19 pandemic meant Recycling Centres closed across Wales and following the first wave Local Authorities reopened Recycling Centres with controls to support keeping residents and employees safe. Cardiff, like a number of authorities, introduced a digital booking system to control numbers of residents accessing the Recycling Centre in a specific time window.
33. The Covid-19 pandemic meant the black bag splitting could not continue due to the pandemic controls in place and Cardiff removed the residual waste / black bag skips and replaced them with non-recyclable material skips. Residents were informed via the booking system that black bags would not be accepted at the Recycling Centres but non-recyclable materials such as polystyrene and bubble wrap would be able to be placed in the non-recyclable material skip.
34. The appointment system and residual waste / black bag controls, when introduced, supported the following:
- Deterring the use of household recycling facilities by commercial users
 - Deterring use of recycling facilities by residents outside the authority area
 - Encouraging residents to sort waste into recyclables and non-recyclables before attending site, thus significantly reducing residual waste

35. Following the introduction of controls, the total mass deposited for recycling at the household facilities fell 32% from 16,855 tonnes per annum in 2019/20 to 11,492 tonnes in 2020/21. The mass of residual black bag waste deposited fell by nearly 79% from 7,925 tonnes in 2019/20 to just under 1,700 tonnes in 2020/21.
36. This reduction in residual waste deposited in turn resulted in the considerable improvement in recycling recovery rate increasing from 67% in 2019/20 to 87% in 2020/21. Cardiff's Recycling centres are now performing in the top quartile across Welsh Authorities.
37. Following booking controls being in place at the Household Recycling Centres, there has been a significant increase in commercial activity at Bessemer Close Commercial Recycling Centre, increasing the projected income by 56% or £220,995 in 21/22 from 2018/19.
38. Commercial activity is small traders and businesses who were previously accessing the recycling centres as residential users. This equates to approximately an additional 2,000 tonnes now being paid for by businesses.
39. The booking system imposed controls on the number of vehicles able to attend site, thus ensuring compliance with Covid-19 measures, and reducing the need to queue. Initially slots were limited to 50 per hour, yet both Recycling Centres were still operating at below 80% capacity.
40. As pandemic requirements have relaxed, and the booking system has become established, the number of slots has increased to 80 vehicles per hour – 20 vehicles every 15 minutes. This means the operating capacity is under 50% at both Recycling Centres.
41. The booking system allows identification of which residents are using the Recycling Centres. The use of the Recycling Centres by residents shows good coverage across Cardiff, with 5 out of the top 8 ward users being in North Cardiff.

Ceasing the provision of red and white striped bags for residents living in properties unable to store 140litre residual bins on the property and allowing residents to present three refuse bags from January 2022

42. In 2015, residents in bin areas were provided 140 litre wheeled bins (as opposed to 240l bins) in order to restrict residual waste. At the same time, the Council introduced red and white striped bags for residents who were unable to store a 140 litre bin at their property. This was to help identify and control the volume of waste presented by properties in bag areas whilst residents adjusted to the limit of 3 bags per fortnight.
43. 13,500 or 10% of Cardiff's properties are still issued free red and white striped bags.
44. The Council currently procures approximately 85,000 rolls of single use striped bags per annum for residents.

45. Cardiff is the only Council in Wales to implement this approach, with other Councils accepting a restricted number of black refuse bags.
46. The management of the procurement and delivery of the red and white striped bags can create problems for residents when they run out of bags, leading to complaints.
47. The process to order new red and white bags when someone moves into a property is complicated, requiring proof of tenancy/new owner needs to be sent to Recycling and Neighbourhood Services.
48. The benefit of ceasing the provision of red and white striped bags will support the vision for a carbon neutral city by 2030, from the One Planet Cardiff Strategy, by removing the need to deliver bags to residents across Cardiff.
49. The cost of procuring and delivering the red and white striped bags is approximately £50,000 per annum, £30,000 to procure the bags and £20,000 to deliver them to residents.
50. The provision of red and white bags will be phased out in 2022 following communication and engagement with residents who receive the bags and providing notice of the changes.

Local Member Consultation

51. The draft recycling strategy 2021-25 will be published for public consultation with a resident survey. This will support the development for the final recycling strategy 2021-25 and the development of actions to deliver improvements. . The final strategy will be brought back to cabinet for approval following consultation.
52. Environmental Scrutiny Committee will be presented the draft recycling strategy 2021-25 to support providing a response to the consultation process.

Financial Implications

53. This report proposes several core actions aimed at delivering improvements as part of the draft Recycling Strategy 2021-25.
54. Paragraph 10 notes that WG has not enforced financial penalties but this is reliant on immediate intervention being in place to ensure targets are met moving forward. In the event of the targets not being met then there will be a significant fiscal penalty for the Council. This risk needs to be carefully monitored and considered alongside the Council's Medium Term Financial Plan.
55. The continuation of the booking system and no black bag policy is anticipated to deliver ongoing savings on processing costs and reduced staff resources no longer required for splitting of bags. These savings have supported the employment of the additional operatives required to manage the new system

which, has also increased the number of traders paying for waste disposal. Income generation savings will result through increased commercial waste disposal and the price for improved cleaner recycling material. No additional funding is required to support this element of the core actions proposed.

56. The proposal to cease provision of red and white striped bags and allowing residents to present 3 refuse bags from 2022 is anticipated to result in savings on bag purchases but could require some initial communication costs to inform the affected residents estimated at £8,000.
57. The proposed pilot for a 3 stream segregated collection alongside the use of reusable bags across 4,000 properties will require revenue funding for operatives and vehicle costs estimated at £128,000 per annum. These could be funded from the existing contingency project budget with no additional revenue funding implications. In addition, capital costs estimated at £95,000 for the acquisition of a specialist vehicle and the purchase of sacks would be funded by a grant and the One Planet Cardiff budget. Any longer term city wide roll-out would have significant additional budget implications which would need to be considered as part of a fully costed business case.

Legal Implications

58. The Council, as a waste collection and waste disposal authority, has various duties under waste legislation with regards collection and disposal of waste. Generally, the Council has a duty to collect household waste and, if requested, commercial waste and industrial waste. The Council also has a duty to arrange for the disposal of controlled waste collected in its area by it, and for places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited.
59. The Council is also required to provide HWRC sites and is required to make arrangements including the area it is situated in, availability of such sites to deposit waste and free of charge to residents. Amongst other things, the arrangements (with regards HWRC sites) may restrict the availability of specified places to specified descriptions of waste.
60. Generally, the Council cannot charge for collection of household waste. However, one exception is the collection of bulky waste (as defined by controlled waste legislation). Any charge should be reasonable.

Equality Duty

61. In considering this matter, the Council must have regard to its public sector equality duties under the Equality Act 2010 (including specific Welsh public sector duties). This means the Council must give due regard to the need to (1) eliminate unlawful discrimination, (2) advance equality of opportunity and (3) foster good relations on the basis of protected characteristics. The protected characteristics are: age, gender reassignment, sex, race – including ethnic or national origin, colour or nationality, disability, pregnancy and maternity, marriage and civil partnership, sexual orientation, religion or belief – including lack of belief.

62. When taking strategic decisions, the Council also has a statutory duty to have due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage ('the Socio-Economic Duty' imposed under section 1 of the Equality Act 2010). In considering this, the Council must take into account the statutory guidance issued by the Welsh Ministers ([WG42004 A More Equal Wales The Socio-economic Duty Equality Act 2010 \(gov.wales\)](#)) and must be able to demonstrate how it has discharged its duty.

Well Being of Future Generations (Wales) Act 2015

63. The Well-Being of Future Generations (Wales) Act 2015 ('the Act') places a 'well-being duty' on public bodies aimed at achieving 7 national well-being goals for Wales - a Wales that is prosperous, resilient, healthier, more equal, has cohesive communities, a vibrant culture and thriving Welsh language, and is globally responsible.
64. In discharging its duties under the Act, the Council has set and published well being objectives designed to maximise its contribution to achieving the national well being goals. The well being objectives are set out in Cardiff's Corporate Plan 2021-24. When exercising its functions, the Council is required to take all reasonable steps to meet its well being objectives. This means that the decision makers should consider how the proposed decision will contribute towards meeting the well being objectives and must be satisfied that all reasonable steps have been taken to meet those objectives.
65. The well being duty also requires the Council to act in accordance with a 'sustainable development principle'. This principle requires the Council to act in a way which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. Put simply, this means that Council decision makers must take account of the impact of their decisions on people living their lives in Wales in the future. In doing so, the Council must:
- Look to the long term
 - Focus on prevention by understanding the root causes of problems
 - Deliver an integrated approach to achieving the 7 national well-being goals
 - Work in collaboration with others to find shared sustainable solutions
 - Involve people from all sections of the community in the decisions which affect them
66. The decision maker must be satisfied that the proposed decision accords with the principles above; and due regard must be given to the Statutory Guidance issued by the Welsh Ministers, which is accessible using the link below: <http://gov.wales/topics/people-and-communities/people/future-generations-act/statutory-guidance/?lang=en>

General

67. The decision maker should be satisfied that the procurement is in accordance within the financial and budgetary policy.

68. The decision maker should also have regard to, when making its decision, to the Council's wider obligations under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.
69. The report also sets out that consultation is going to be undertaken with the public. Any consultation must be adequate and fair. The carrying out of consultation gives rise to a legitimate expectation that the outcome of the consultation will be considered as part of the decision making process.

HR Implications

70. The information held within this report has been consulted on with the Trade Unions and employees within the service are aware of the proposed plans. This consultation will continue as the pilots.
71. Any employee implications that arise from the pilots will be assessed as part of the full business cases for any changes. However, any changes for employees or additional resources required will be fully consulted on as part of the business cases and will be carried out in compliance with corporately agreed processes.

Property Implications

RECOMMENDATIONS

Report to Cabinet

A report will be taken to Cabinet recommending that Cabinet:

1. Note the draft recycling strategy 2021-25; 'Make a change to save our planet – Reduce, Re-use, Recycle'.
2. Approve the consultation on the draft recycling strategy 2021-25 – 'Make a change to save our planet – Reduce, Re-use, Recycle' and associated resident survey on improving recycling performance.
3. Agree to:
 - i. support a pilot of 3 stream segregated collections for glass, mixed containers (plastic and metal) and paper / cardboard; alongside the use of reusable bags
 - ii. retain the Recycling Centre booking system and 'no black bag' policy
 - iii. cease the provision of red and white striped bags for residents living in properties unable to store 140litre residual bins, instead allowing residents to present three refuse bags per fortnight from 2022

SENIOR RESPONSIBLE OFFICER	NEIL HANRATTY
	Director Economic Development
	1 December 2021

The following appendices are attached

Appendix A – Draft recycling strategy 2021-25; ‘Make a change to save our planet – Reduce, Re-use, Recycle’

Appendix B – Consultation Survey for Draft recycling strategy 2021-25; ‘Make a change to save our planet – Reduce, Re-use, Recycle’

The following background papers have been taken into account:

The Recycling, Preparation for Re-use and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011

<https://www.legislation.gov.uk/wsi/2011/1014/contents/made>

Cardiff Council Waste Compositional Analysis. Waste composition analysis of kerbside collected and communally collected household waste in Cardiff. WRAP/resourcefutures. September 2021