

Report to: Cabinet

Date: 16 September 2020

Title: Improving recycling – public consultation

Report of: Tim Whelan, Director of Service Delivery

Cabinet member: Councillor Jonathan Dow, Cabinet Member for Climate Change

Ward(s): All

Purpose of report: To introduce a public consultation exercise on potential adaptations to the waste and recycling collection service in order to improve the town’s recycling rate and to contribute to meeting carbon reduction and financial objectives.

Decision type: Key

Officer recommendation(s): That Cabinet–

(1) Agrees to officers working on potential adaptations to the waste and recycling collection service to meet challenging national and local recycling targets, to reduce the carbon emissions associated and contribute to meeting financial challenges

(2) Approves the proposal to consult with residents through autumn 2020 on those potential adaptations

(3) Invites officers to bring service change proposals and resident responses to Cabinet for consideration, early 2021

Reasons for recommendations: The UK Government’s ambitions for higher recycling rates and increased resource efficiency, alongside helping to meet challenging local financial and carbon reduction objectives.

Contact Officer(s): Name: Jane Goodall
Post title: Strategy and Partnership Lead, Quality Environment
E-mail: jane.goodall@lewes-eastbourne.gov.uk
Telephone number: 01323 415383

1 Introduction

1.1 The Environment Bill, reintroduced to Parliament on 30 January 2020, includes

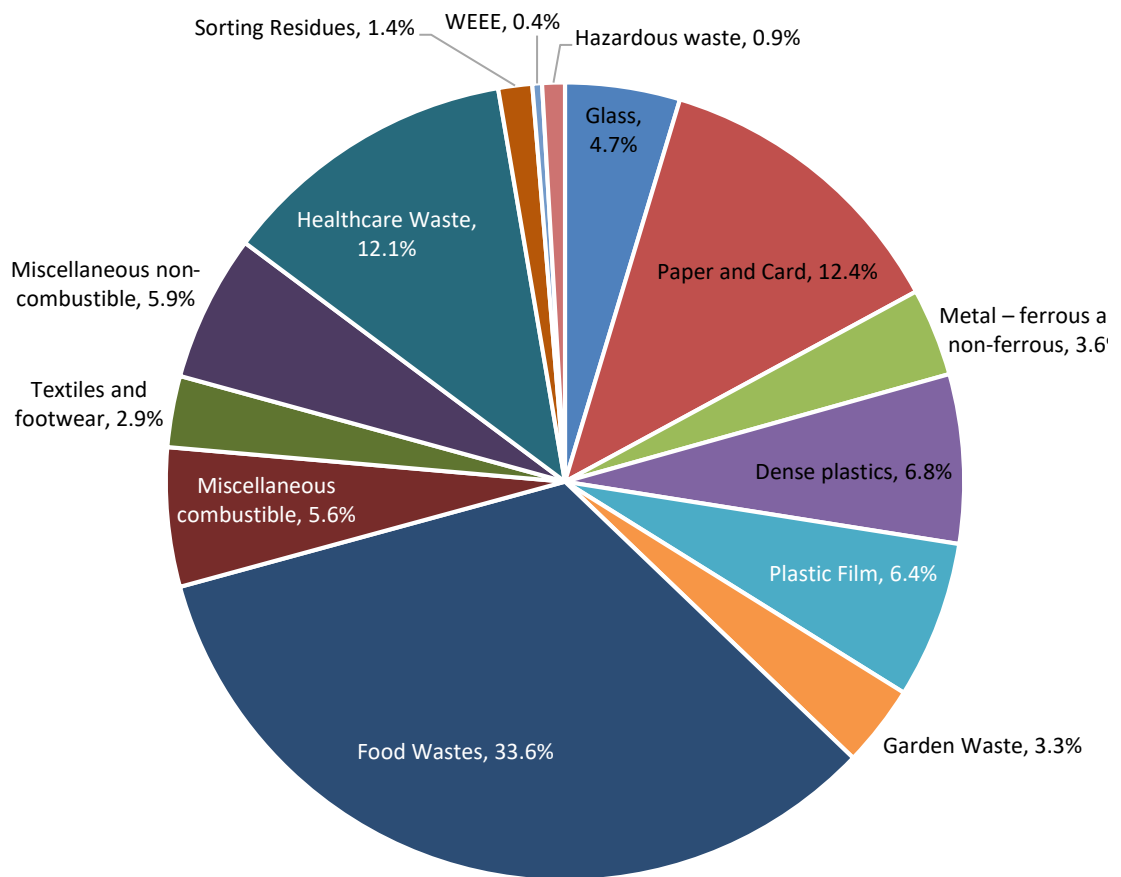
ambitions for higher recycling rates and increased resource efficiency, including the possible future requirement for food waste collections. Such ambition has significant implications for local government waste collection authorities.

- 1.2 The national recycling target for household waste this year is 50%, increasing to 65% of waste recycled by 2035, at a time when rates across the country have plateaued.
- 1.3 The percentage of household waste which has been sent by Eastbourne Borough Council for reuse, recycling and composting:
 - Provisional rate for 2019/20: 34.88%
 - 2018/19, confirmed as: 35.2%
- 1.4 In common with every other local authority at this time, we face significant financial challenges as a result of the Covid-19 pandemic.
- 1.5 This report marks the formal start of a work programme designed to support Eastbourne to meet the challenges of improving recycling performance within the current financial context and puts forward an approach for consulting with the public over likely future changes, with an emphasis on understanding what issues they may present for residents and how the council can help mitigate them.

2 Background

- 2.1 Broadly, the 'interventions' to improve recycling performance fall under the following: resident engagement, crew behaviour and changes to collections.
- 2.2 The council's waste collection service is provided by South East Environmental Services Ltd (SEESL), as Environment First. Collection frequencies are: weekly waste, fortnightly recycling and fortnightly paid-for garden waste.
- 2.3 Since July 2019, Environment First has been performing well (for example, missed bins reduced from 163 in July 2019 to 111 in July 2020) and EBC offers an extra recycling container to households as required.
- 2.4 Nevertheless, recycling performance has stalled; see Appendix 1, Waste and recycling performance.
- 2.5 From the waste composition analysis carried out on behalf of the East Sussex Joint Waste Partnership in June 2017, there is strong evidence that recyclable material is still in the residual waste stream (see Figure 1 and background papers, report to Scrutiny, 3 February 2020). According to this analysis, over a quarter of the residual waste collected in Eastbourne could have been recycled at the kerbside.

Figure 1: Overall composition of residual waste in Eastbourne



- 2.6 A further complexity is the relatively high level of contaminated (or ‘prohibitive’) material in Eastbourne’s dry mixed recycling. In June 2020 ‘prohibitive’ content accounted for 7.33% of the mix. ESCC has set the contract specification tolerance at 10%. Contaminants include textiles and food which affect the quality and value of the collected recycling.
- 2.7 Quality checks are undertaken as part of the collection service and 225 recycling bins were logged as contaminated by our crews in June 2020. When this happens, the householder is required to remove the offending material from the receptacle before the next collection. Nevertheless, the levels of contamination continue to be a challenge.
- 2.8 Resident information campaigns are engaging and ‘how to recycle’ is regularly promoted. See Appendix 2 for examples of communications from Environment First.
- 2.9 Other measures have included tidying up bring sites and educating residents, for example those living in HMOs (houses in multiple occupation), with the aim of reducing fly-tipping, reducing contamination and increasing recycling.

2.10 Changing collection frequencies

The majority of local authorities have moved to alternate weekly collections (AWC) - i.e. one week waste the next week recycling, or in some cases to three or four weekly collections of refuse, in order to achieve optimised rounds and to influence residents' behaviour in how they sort their waste for collection, with a result that dry mixed recycling increases.

Table 1: A summary of the proportion of Waste Collection Authorities in England, Wales, and Scotland providing residual waste collections less frequently than every week. This is based on 2018/19 data provided by local authorities to WRAP (the Waste and Resources Action Programme). No data were available for Northern Ireland.

Region (No. WCAs recorded)	WCAs offering weekly residual to all premises	WCAs offering 2-weekly residual collections	WCAs offering 3-weekly residual collections	WCAs offering 4-weekly residual collections
England (307)	23%	75%	2%	0%
Scotland (32)	0%	84%	13%	3%
Wales (22)	0%	77%	23%	0%
TOTAL (361)	19%	76%	4%	0%

2.11 Within the South East of England, just 20 out of 67 authorities (less than 30%) still offered weekly residual waste collections across their area in 2018/19. Since that time even more authorities have been moving toward less frequent collections of residual waste (locally, Adur and Worthing moved to AWC last year).

2.12 Proposal

This report sets out the approach to consult with residents through the autumn on plans for an adapted waste and recycling collection service, beginning Monday 28 September 2020. The purpose is to ensure residents receive a fit for purpose service and obstacles to improving recycling are identified and mitigated before any changes are made.

2.13 Next steps

The next step for the operational service is to refine potential adaptations to waste and recycling collections to meet challenging recycling and financial targets.

3 Outcome expected and performance management

- 3.1 The council seeks to achieve an inclusive approach to communications and engagement that informs residents about the value of recycling properly and ensures that the preferred operational service model is a good fit for Eastbourne.
- 3.2 This report recommends a communications and engagement approach designed to improve residents' understanding of our mission and to improve the council's understanding of impacts of service changes on residents.
- 3.3 In tandem with this public consultation exercise, the collection service will be redesigned to lead to optimised rounds and improved recycling for Eastbourne. Some authorities provide two, three, or four weekly collections to many of their residents, while still offering weekly collections to a limited number of premises, e.g. town centres, areas prone to ASB or other issues.
- 3.4 The business case will be developed through the autumn to demonstrate financial efficiencies associated with proposed operational changes.
- 3.5 The potential to reduce carbon emissions associated with the waste and recycling service will also be clearly demonstrated as part of this process, see Appendix 3: Carbon emissions, fleet.

4 Consultation

- 4.1 The purpose of the consultation exercise is to identify the issues and obstacles for all residents, including those who may need assisted collections.
- 4.2 The improvements likely to be under consideration would be a big change for residents and while some will welcome the increased recycling, residents may also have questions or concerns. The purpose of the proposed consultation would be to better understand how potential changes would affect residents and what the council might need to put in place to help residents under the new arrangements.
- 4.3 It is proposed that a public consultation be carried out for twelve weeks beginning Monday 28 September. An online survey would be provided for residents to structure their feedback and an offer will be made to mail paper copies of the survey to those without internet access. The survey and consultation information will also be offered in alternative formats in-line with the Equality Act 2010 provisions around providing reasonable adjustments to those with protected characteristics.
- 4.4 A comprehensive frequently asked questions document will be made available which will be added to throughout the consultation. The purpose of this is to provide as much information as possible and be transparent about the implications of the changes.
- 4.5 The consultation will be widely publicised through all of the council's

communications channels and directly with partners and internal stakeholders.

5 Corporate plan and council policies

- 5.1 The council has committed to making the town carbon neutral by 2030. Optimising waste collection operations to reduce fleet mileage would contribute to a lower carbon footprint and improved air quality in Eastbourne.
- 5.2 The 'Eastbourne Carbon Neutral 2030 – A Plan for Action' climate change strategy (due November 2020) vision for waste is: 'We have a clean town that enables residents and visitors to reduce waste, our recycling rates put us in top 25% of authorities nationally and we have reduced non-recyclable waste'.
- 5.3 A key performance indicator is to 'increase the percentage of household waste sent for reuse, recycling and composting'.

6 Business case and alternative option(s) considered

- 6.1 The proposed consultation is part of the process to evaluate options.
- 6.2 The business case relating to changes in the collection service will be developed through the autumn.

7 Financial appraisal

- 7.1 The Environment Bill has some significant financial implications (food and garden waste) and it is not yet understood how any new requirements will be supported financially by central government.
- 7.2 For the purposes of this report, the direct financial and resource implications of the public consultation and engagement exercise are: printing costs (no more than £200); room hire, if required for a public meeting (between £344- £1,160 per day); and officer time.

8 Legal implications

- 8.1 The legal framework for consulting on potential changes to waste and recycling collections is governed by common law principles and relevant best practice and guidance. The potential impact of waste collection changes gives rise to an implied duty to consult over proposals. The key requirements of the consultation are that–

- It takes place while proposals are still at a formative stage
- It contains sufficient detail and explanation to enable consultees to understand the proposals and therefore to respond on an informed basis
- Consultees are given sufficient time to consider the proposals and respond
- The product of consultation are fed into the decision-making process, i.e. Cabinet must have due regard to responses before determining the future policy on collections

As the proposals are likely to affect every household and, if implemented, may require householders to change their approach to waste, best practice suggests that consultation should last 12 weeks, to enable consultees to consider the implications in full and formulate their responses.

Lawyer consulted 21.08.20

Legal ref: 008233-JOINT-OD

9 Risk management implications

- 9.1 This report is strategic in nature. It is noted that there are reputational risks associated with not achieving the target recycling rate of 50%.

10 Equality analysis

- 10.1 The purpose of the consultation exercise is to identify the issues and obstacles for all residents, including those who may need assisted collections. Alternative formats, including paper copies of the consultation, will be available upon request. Equality monitoring questions (in line with the council's equality monitoring policy) will be included as part of the survey.

An Equality & Fairness Analysis will be undertaken alongside the public consultation and completed by the time this matter is returned to Cabinet in early 2021.

11 Environmental sustainability implications

- 11.1 Eastbourne Borough Council aims to minimise waste and to recycle or reuse as part of a circular economy approach to tackle the climate and nature emergency.
- 11.2 The treatment and disposal of waste accounts for 2% of the borough's carbon footprint as calculated using the Scatter methodology, this amounts to around 9,300 tonnes of carbon dioxide equivalents emitted during 2017.
- 11.3 Increasing the recycling rate and optimising waste collection operations to reduce fleet mileage would contribute to a lower carbon footprint in Eastbourne.

12 Appendices

- Appendix 1 – Waste and recycling performance analysis
- Appendix 2 – Examples of comms and engagement
- Appendix 3 – Carbon emissions, fleet

13 Background papers

The background papers used in compiling this report were as follows:

- The Environment Bill
<https://www.gov.uk/government/publications/environment-bill-2020/30-january-2020-environment-bill-2020-policy->

[statement#:~:text=The%20Environment%20Bill%20enables%20greater, and%20with%20relevant%20public%20bodies.](#)

- <https://www.circularonline.co.uk/news/government-to-set-legally-binding-targets-to-help-build-back-greener/>
- Scrutiny report 3 Feb
- SEESL Board report March 2020