

<b>CABINET</b>	<b>DATE</b> 16 September 2020	<b>ITEM NO</b> 11
<b>TITLE</b> 'towards zero waste' strategy update – policy proposals following consultation	<b>WARD (S)</b> All	
<b>CHIEF OFFICER</b> Director Communities and Environment	<b>CABINET MEMBER</b> Environment, Sustainability and Transport	
<b>DECISION CLASSIFICATION</b> - Key - Non-exempt	<b>FINAL DECISION</b> To be made on the recommendations in this report.	

**I. Decision required**

This report makes the following recommendations to the decision-maker:

- I.1 To note the results of the Towards Zero Waste public consultation which was conducted between 3<sup>rd</sup> February and 15<sup>th</sup> March 2020 which have been used to help formulate these proposals (Appendix A).
- I.2 To note the content of this report and appendices which seeks approval for waste and recycling policy and service delivery changes in the Royal Borough of Greenwich (RBG), which will collectively take up to two and a half years to implement.
- I.3 To approve the proposal to restrict the collection frequency of general waste (black top bin) to fortnightly for kerbside houses on wheelie bin collection rounds. To no longer accept collection of side waste. These policy changes will take up to two and a half years to implement (Appendix B).
- I.4 To agree the proposal to limit the availability of free clear recycling sacks to properties which cannot safely store a recycling (blue top) wheelie bin and who must use the sacks to access the recycling service. These policy changes will occur in October 2020 (Appendix C).

- 1.5 To reject the introduction of a subscription fee for separately collected garden waste recycling but to introduce separate food waste collections by 2023 when mandated in legislation and when funded by central government. To note the requirement to review the MTFs baseline as revenue saving associated with this income stream will not be achieved (Appendix D).
- 1.6 To agree the proposal to no longer empty contaminated recycling bins and to place the onus on the householder to ensure blue and green top bins contain only good quality, clean material. To introduce an optional collection charge for contaminated recycling bins to be collected as general waste. These policy changes will take up to two and a half years to implement (Appendix E).
- 1.7 That the Towards Zero Waste update to the Municipal Waste Strategy (2016-2025) is adopted by the Council (Appendix F).

## 2. **Links to the Royal Greenwich high level objectives**

2.1 This report relates to the Council's agreed high-level objectives as follows:

- A Healthier Greenwich
- A Cleaner, Greener Greenwich

2.2 The proposals in this report work towards acting on the Council's declaration of a Climate Emergency and work towards the vision of Royal Greenwich becoming a Zero Waste borough.

2.3 The objectives of these proposals are to increase the quantity and quality of recycling collected from kerbside households in the Borough and to reduce the total amount of waste that is produced.

2.4 These proposals will also reduce the impact on the environment of RBG waste management operations in terms of consumption of single use plastic sacks and HGV waste fleet movements.

### **3. Purpose of Report and Executive Summary**

- 3.1 The current recycling rate in Greenwich is 32.7% (2019/20<sup>1</sup>) and is decreasing.
- 3.2 Rapid regeneration is resulting in a high proportion of flatted accommodation (where there are nationally recognised barriers to collecting good recycling) and placing a downward pressure on the overall proportion of waste that is recycled.
- 3.3 Measures to increase the level of recycling in flats include all planning applications being reviewed and having to meet specific requirements to satisfy a refuse planning condition, as well as, a number of pilot projects on housing estates and new developments.
- 3.4 Evidence<sup>234</sup> shows that where service delivery changes (restriction of general waste) are backed up with strong policy (i.e. in terms of contamination and ‘no side waste’) there is significant opportunity to make positive improvements to recycling.
- 3.5 This report seeks approval for a package of proposals for waste and recycling policy and service delivery changes that can be implemented in Royal Greenwich. The proposals aim to increase recycling, reduce waste, cut single-use plastic, improve service delivery efficiency and reduce our harmful impact on air quality.
- 3.6 Additionally, these proposal, if agreed, would also deliver significant savings from £76k to £1.2m per annum (the savings and costs for each proposal are highlighted in each appendices).
- 3.7 The proposals will assist in RBG working towards being a Zero Waste borough, managing waste in accordance with the waste hierarchy and contributing meaningfully towards national and regional targets.

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<sup>1</sup> Unaudited figure which may be subject to a small change

<sup>2</sup> WRAP. (2007). Alternate Weekly Collections Guidance

<sup>3</sup> WRAP. (2015). Analysis of recycling performance and waste arising in the UK 2012-13. p.30

<sup>4</sup> Williams, Ian & Cole, Christine. (2013). The impact of alternate weekly collections on waste arisings. The Science of the total environment. 445-446C. 29-40. 10.1016/j.scitotenv.2012.12.024.

#### 4. **Introduction and Background**

- 4.1 Public awareness of climate change, plastic pollution, recycling and other environmental issues has increased dramatically in recent years due to high profile media coverage. RBG has also declared a Climate Emergency, which is a recognition that time is running out in which to act to mitigate climate change.
- 4.2 An update to Greenwich's Municipal Waste Strategy (2016-2025) was drafted in 2019 titled Towards Zero Waste (TZW). The TZW Strategy Update set out a vision for Greenwich to work towards being a 'Zero Waste' borough and presented proposals for ways that waste policy and service delivery could be changed to increase recycling rates. Research has shown that delivery changes to encourage households to become more responsible in how they dispose of their waste generally result in cost savings.
- 4.3 The public were consulted on the proposals in February and March 2020 and the findings used to help further develop these proposals (Appendix A).
- 4.4 Following analysis of the consultation findings and the development of the proposals presented in this report the draft TZW Strategy has been finalised and included as Appendix F.
- 4.5 The RBG Municipal Waste Strategy (2016-2025) was adopted at Cabinet in September 2016. Since adoption of the Waste Strategy there have been various legislative and policy changes, with further developments on the horizon following recent Department for Environment, Food and Rural Affairs (DEFRA) consultation. Likewise, the 'Green, Blue, Black' waste and recycling service has been in operation since 2008 and has received no significant review since its implementation.
- 4.6 The past two years has seen significant developments to the London and National waste, resource and environmental policy framework. DEFRA published both its 25 Year Environment Plan (*A Green Future: Our 25 Year Plan to Improve the Environment*) and Resources and Waste Strategy (*Our waste, our resources: a strategy for England*). The Government's Resources and Waste Strategy contained measures to cut single use plastics, increase recycling and reduce waste and gave rise to a series of consultations during early 2019 which presented proposals which will shape how Local Authorities operate household waste and recycling services in the future.

- 4.7 At a regional level the Mayor of London's Environment Strategy (LES) was published in May 2018, the first strategy of its kind for London, and set challenging targets including a cumulative London-wide recycling rate of 50% by 2020. The LES requires each London Borough to submit a Reduction and Recycling Plan (RRP), for approval by the Mayor every 4 years, demonstrating what each Borough is doing to act in conformity with the LES through maximising recycling, reducing waste production and the impact of waste operations on the environment. The RRP for RBG was approved by the Mayor of London in March 2020.
- 4.8 This report seeks approval to further develop, plan and proceed with these policy and service delivery proposals, in line with Government and Mayor of London strategic ambitions, which are summarised below and examined in detail in Appendices B to E.
- 4.9 Restriction of general waste (see Appendix B)
- 4.9.1 All waste generated in RBG must be collected, processed and disposed. The waste disposal market charges more for general waste (black bin waste) than for waste that can be recycled or composted. Monitoring of measures introduced at other authorities in England indicate that restricting the amount of general waste each household can throw away to a 240L wheelie bin collected fortnightly would drive behaviour change and increase the recycling rate by c.5% (from 32.7% currently to c.38%). This would also make the general waste service more efficient.
- 4.9.2 By improving the efficiency of general waste service delivery and diverting more materials to less expensive recycling treatment, the Council could make annual savings of c.£460k (following an initial start-up cost of c.£565k).
- 4.10 Limiting availability of free clear recycling sacks (see Appendix C)
- 4.10.1 Limiting the availability of free clear recycling sacks only to households which cannot safely store a recycling wheelie bin would result in an annual saving of c.£76k on material costs and delivery of the sacks.
- 4.10.2 The sacks are an unnecessary use of single use plastic and there is no evidence to suggest that they further increase recycling when residents already have access to a recycling bin. The sacks are also known to interfere with modern recycling sorting technology, so a small increase in the amount that is recycled should be achieved.

- 4.11 Rejection of introduction of a subscription charge for the collection of garden waste recycling (see Appendix D)
- 4.11.1 Proposals for new legislation are emerging concerning how local authorities must collect and treat food and garden waste, including whether they will continue to have the ability to charge for the collection of garden waste.
- 4.11.2 The provision of separate collections of food waste recycling by all local authorities in England will be made mandatory by 2023 with transition and new operational costs being fully funded by central government, however, the changes required to RBG's existing mixed food and garden waste service is yet to be confirmed. The mandatory provision of fortnightly, free collections of garden waste is currently under review by DEFRA (please see Appendix for further details).
- 4.11.3 Our resident consultation showed that residents strongly opposed the introduction of a subscription charge. The MTFS baseline will need to be reviewed as the potential £570k per annum revenue savings associated with this proposal will not be achieved.
- 4.12 Introducing a zero-contamination collection policy (see Appendix E)
- 4.12.1 The current practice of collecting contaminated blue or green wheelie bins as general waste on the same collection day is not effective in driving behaviour change towards proper use of recycling facilities. The current system means that by returning to collect contaminated bins on collection day, householders who are out all day may not even realise that their bin was contaminated and so may continue to dispose of their waste in the same way and contaminate their bins.
- 4.12.2 Ceasing to empty contaminated bins and placing the responsibility on the resident to ensure blue and green bins contain only good quality recyclable or compostable material could save up to c.£130k a year on disposal costs. This is common practice among local authorities across the country.
- 4.12.3 The Council would provide an optional service to empty contaminated bins following the issue of a Section 46 Notice that covers the additional cost of returning to these properties.

## 5. Available Options

5.1 **Option 1 (preferred option):** That the recommended package of policy and service delivery proposals detailed in section 4 and appendices B-E are approved for implementation and the Towards Zero Waste strategy is adopted by Cabinet. These are:

- restricting general waste collection to fortnightly in 240L bins with no side waste accepted;
- cease the provision of clear recycling sacks to properties able to store a blue-top recycling bin;
- maintaining the free provision of food and garden waste collections; and
- to require households to take responsibility for the waste in their recycling bin by introducing a zero-contamination policy.

5.2 **Option 2:** To approve and/or reject a different selection of the policies and service delivery proposals from the recommended option. These were:

- restricting general waste collection to:
  - o fortnightly in 240L bins with no side waste accepted;
  - o weekly in 140L with no side waste accepted;
  - o fortnightly in 140L bins with no side waste accepted;
- cease the provision of clear recycling sacks to properties able to store a blue-top recycling bin;
- charge for the provision of garden waste collections and require residents to separate their food waste in a fourth container;
- to require households to take responsibility for the waste in their recycling bin by introducing a zero-contamination policy.

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The Towards Zero Waste Strategy Update would be brought back to Cabinet to reflect the approved policy package.

5.3 **Option 3:** That no proposals are approved, and the current service delivery model continues unchanged. The Towards Zero Waste Strategy Update is not adopted by Cabinet.

## 6. Preferred Option - Option 1

6.1 Option 1 - That the recommended package of policy and service delivery proposals detailed in section 4 and appendices B-E are approved for implementation and the Towards Zero Waste strategy is adopted by Cabinet.

## 7. **Reasons for Recommendations**

- 7.1 The options proposed demonstrate widespread acceptance of the responses in the public consultation. These showed strong support across all postcodes for:
- the Council saving money by increasing recycling;
  - meeting national recycling targets;
  - residents being made responsible for recycling correctly;
  - the Council working towards becoming a Zero Waste borough.
- 7.2 These should also result in the largest increases in the recycling rate and deliver significant financial savings when introduced together.
- 7.3 Restriction of general waste would be the catalyst to changing behaviour and increasing recycling. Underpinning this with a 'no side-waste' policy and a strong contamination policy will ensure that effective restrictions are maintained, and the quality of recyclable material remains good.
- 7.4 Limiting the availability of clear recycling sacks will be supplementary to this by greatly reducing the use of single use plastic and ensuring the sorting machinery at the MRF operates effectively.
- 7.5 The reason for rejecting the introduction of a charging model is that it was strongly opposed by residents currently using the service, would result in a greater quantity of garden waste entering the general waste collection stream, could result in residents making more individual trips to the Nathan Way Household Waste and Recycling Centre and could increase levels of fly-tipping.
- 7.6 Adoption of the Towards Zero Waste strategy will formalise the Councils vision of working towards being a Zero Waste borough and clearly sets out the service and policy changes and expected benefits.
- 7.7 Options 2 and 3 are not recommended, policy and service delivery changes implemented in isolation will not achieve the maximum potential benefits.

## **8. Consultation Results**

- 8.1 A consultation on the proposals contained in the TZW Strategy (and wider topics on recycling and household waste management habits) was conducted between 3rd February and 15th March 2020. The consultation was hosted online, with paper copies available upon request. It was advertised extensively through social media channels, Greenwich Info and supported by 15 advertised drop-in sessions at all the libraries across the borough, including sessions on evenings and weekends.
- 8.2 4,823 completed surveys were received with 74% supporting RBG working towards being a Zero Waste Borough. A summary of the consultation findings has been included in Appendix A and detail on how the findings influenced each of the proposals in Appendices B to E.
- 8.3 Full equality impact assessments have been carried out for each of the individual proposals (see Appendix G) The proposals are deemed to have no low, or no, impact on protected groups. In the instances where a low impact is identified, then mitigating measures have been detailed to reduce the impact.
- 8.4 Examples of mitigating measures would be provision of 'assisted collections' to elderly or disabled residents who have trouble in moving wheelie bins containing a fortnights quantity of waste when restricting general waste collections. Or ensuring that communications literature is produced in large print and pictorial form so that it can be understood by elderly residents and those who do not speak English as their first language.

## **9. Next Steps: Communication and Implementation of the Decision**

- 9.1 Indicative timelines have been included in each Appendix report, in some instances with options on the delivery timescale to account for the avoidance of service changes over particularly busy times of the year for the waste service such as the Christmas period.
- 9.2 50% of all respondents to the consultations said that they would like any service change to be communicated to them via either letter, leaflet or email. These findings will be taken in to account when communication service and policy changes.
- 9.3 It is expected that, pending approval, the whole package of service changes would take up to 2 and a half years.

10. **Cross-Cutting Issues and Implications**

Issue	Implications	Sign-off
<p><b>Legal</b> including Human Rights Act</p>	<p>The Council is under a statutory duty to collect domestic household waste, free of charge, and arrange for its disposal pursuant to the Environmental Protection Act 1990 as amended. There is a further to requirement, under the 1990 Act, to have in place separate arrangements for the collection of 2 types of recyclable waste, unless the cost of doing so would be unreasonably high, or comparable alternative arrangements are available.</p> <p>Collection and disposal charges are permitted for prescribed domestic household waste within the Controlled Waste (England and Wales) Regulations 2012, and includes a power to impose a charge for collection only, of garden waste.</p> <p>Section 355, Greater London Authority Act 1999, imposes a requirement for the Council’s waste management plan to be in general conformity with the London Environment Strategy (LES). The Council’s current waste management plan is approved by the Mayor of London, under LES, notwithstanding it does not provide for a separate food waste collection</p> <p>The Council is able to regulate the types of recycling containers that may be used and the types of recyclable waste that may be placed in the containers by services of a notice under section 46 of the Environmental Protection Act 1990. There is a right of appeal against the notice to the magistrates’ court. The</p>	<p>Kamaljit Jandu Senior Lawyer, 20<sup>th</sup> August 2020</p>

	<p>Council is able to impose a collection charge for items not permitted to be placed in the recycling containers but are so placed in the containers.</p>	
<p><b>Finance</b> and other resources including procurement implications</p>	<p>This report asks to the decision-maker to note the content of this report and appendices which seeks approval for waste and recycling policy and service delivery changes in the Royal Borough of Greenwich (RBG).</p> <p>In summary these are:</p> <p>To note the proposal to restrict the collection frequency of general waste (black top bin) to fortnightly for kerbside houses on wheelie bin collection rounds. To no longer accept collection of side waste as detailed in Appendix B. A saving of £147k was accepted against changing the service to a weekly collection with a smaller bin. If agreed the option now proposed could deliver a significantly higher saving of £460k against a lower Capital investment.</p> <p>To note the proposal to limit the availability of free clear recycling sacks to properties which cannot safely store a recycling (blue top) wheelie bin and who must use the sacks to access the recycling service as detailed in Appendix C. A saving of £89k was accepted against this service change and if agreed this option could deliver an actual saving of £76k. This is a shortfall of £13k which will need to be identified elsewhere.</p> <p>To note the intention to reject the introduction of a subscription fee for separately collected garden waste recycling but to introduce separate food waste collections by 2023 when mandated in legislation and when funded</p>	<p>Joanne Stark Accountancy Business Change Manager 27.8.20</p>

	<p>by central government. This is detailed in Appendix D. A saving of £570k was accepted against this service change (from 2022/23) so there will be a requirement to review the MTFS baseline as the revenue saving associated with this income stream would not be achieved if this proposal is accepted.</p> <p>To note the proposal to no longer empty contaminated recycling bins and to place the onus on the householder to ensure blue and green top bins contain only good quality, clean material. To introduce an optional collection charge for contaminated recycling bins to be collected as general waste as detailed in Appendix E. There is a potential saving associated with this proposal from the optional charge that could be introduced and from reduced disposal costs. Initial estimates suggest this could be in the region of £130k per annum.</p> <p>Points 1.6 and 1,7 have no direct financial implications.</p>	
<p><b>Equalities</b></p>	<p>Decision-makers are reminded of the requirement under the Public Sector Equality Duty (s149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper could directly impact on end users. The impact has been analysed and does not vary between groups of people. The results of</p>	<p>Tom Newman Strategy Officer 30 April 2020</p>

	<p>this analysis are immediately below. [Further information is also available in the equality impact assessment attached at Appendix G.</p>	
<p><b>Staffing establishment</b></p>	<p>Implementation of a fortnightly general waste collection and chargeable garden waste (with separate food) would reduce the number of waste collection operatives and HGV drivers required to run the service. It is not expected that cuts will be made to achieve this, but that vacancies will not be filled through natural churn of the workforce and not recruiting to vacant positions as they arise.</p>	<p>Tom Newman, Strategy Officer. 30<sup>th</sup> April2020</p>
<p><b>Risk management</b></p>	<p>Risks and mitigating measures pertaining to each of the proposals are included in each of the Appendices B-E.</p>	<p>Tom Newman Strategy Officer 5<sup>th</sup> May 2020</p>
<p><b>Environment and sustainability</b></p>	<p>The proposals support RBGs commitment to the environment but increasing recycling, reducing waste, cutting out single use plastic and reducing impact on air quality.</p> <p>The proposal has no impact on RBGS obligations under <u>Section 40, National Environment and Rural Communities Act 2006:</u> “40(1) Every public authority must, in exercising its functions have regard so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”</p>	<p>Tom Newman Strategy Officer 5<sup>th</sup> May 2020</p>

<p><b>Community safety</b></p>	<p>The proposals do not have any implications on RBGs obligations under</p> <p><b>(b) Section 17, Crime and Disorder Act 1998</b></p> <p>“17(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.”]</p>	<p>Tom Newman Strategy Officer 5<sup>th</sup> May 2020</p>
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## 11. **Report Appendices**

11.1 The following documents are to be published with and form part of the report:

- Appendix A: Summary of Towards Zero Waste consultation results
- Appendix B: Restriction of general waste collection – following public consultation
- Appendix C: Limiting the scope of free clear recycling sack distribution – following public consultation
- Appendix D: Chargeable garden waste collections – following public consultation
- Appendix E: Introducing a zero-contamination collection policy – following public consultation
- Appendix F: Towards Zero Waste Strategy
- Appendix G: Full Equality Impact Assessment report

## 12. **Background Papers**

12.1 There are no additional background papers accompanying this report

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