



NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

Environment, Regeneration and Street Scene Scrutiny Committee

Waste Strategy Review Task and Finish Group

24th February 2023

Report of the Head of Streetcare – Mike Roberts

Matter for Decision

Wards Affected: All Wards

Draft Waste Strategy Action Plan 2023

Purpose of the Report:

To provide proposed actions for scrutiny, developed further to two All-Member seminars, aimed at ensuring the council achieves the next statutory recycling target of 70% in 2024/25.

Executive Summary:

Two all Member seminars have been held, one in October 2022 and one in February 2023, to consider issues with a view to agreeing actions aimed at ensuring continued progress with successfully meeting the next statutory recycling target.

This report contains a series of measures as a result of information provided at, and feedback received from, the all-Member seminars as well as associated investigations by officers.

Background:

The Council's recycling performance at the end of 21/22 was 66% and previous ongoing improvement has halted. The Council therefore needs to review its approach and produce an action plan to re-invigorate growth in performance to ensure the next statutory recycling target of 70% is met target.

Failure to achieve the statutory recycling targets can be subject to a fine by Welsh Government of £200 for every tonne the target is missed, and in every year the target is missed. For Neath Port Talbot it is estimated the potential fine would amount to £143,000 per 1% the target is missed.

As part of developing an action plan an all-Member seminar was held on 13th October 2022 where the current context and issues were presented and discussed, along with some indicative actions. This was followed by a four week consultation period for Members to make further contributions or seek answers to further queries. A subsequent seminar was then held on 16th February 2023 where modified potential measures were presented and further discussed. Arising from those meetings and associated work, a draft action plan intended for the Environment, Regeneration and Street Scene Cabinet Board in April 2023 is now presented for scrutiny.

Proposed Actions:

Measure 1: To modernise service delivery and help facilitate improved service monitoring for the benefit of customers, it is proposed to implement an in-cab live feed data system for waste vehicles.

Financial Implications: One-off process mapping, data update and IT platform - £50,000, One-off Capital - £150,000 (£3,000 per vehicle), plus, ongoing annual revenue costs of £15,000 which can likely be recovered from improved management of trade waste contracts alone.

[Costs assume an “off-the-shelf” solution. An in-house Digital Services option is also being considered]

Measure 2: Employ a Recycling Officer (Grade 5) to pursue increased community engagement including schools engagement, produce online & physical educational materials, and to help deal with increasing service demand.

Financial Implications: Gr 5 Officer - £30,000 per annum plus Revenue Marketing budget: Year 1 - £30K including production of new online resources, Year 2 Onwards - £15K for materials/advertising/community activities.

Measure 3: To introduce free biodegradable ‘dog poo’ bags for public use. Bags to be made available for collection in community locations such as Post Offices alongside existing provision of food waste bags

Financial Implications: An initial up-front purchase cost for stock at £44,000 (Based on 2 boxes per fortnight for 60 locations of the County Borough)

Ongoing cost: Whilst as set out in first all-member seminar the evidence suggests that many households are ordering more expensive food waste bags to use as dog poo bags, it is not known exactly how many of the average 30% of households with a dog are doing this. It would be prudent to assume not all expenditure on dog poo bags would be recovered from savings in food waste bag provision, and it is suggested an ongoing net revenue increase of £10,000 for dog poo bags is budgeted for.

Measure 4: Implement an additional Grade 4 delivery driver and van for recycling equipment and an overtime budget allocation for times of increased service demand (i.e. summer for green bags, Christmas etc.)

Investigate the feasibility of 'click & collect' facilities at HWRCs or other staffed locations

Financial Implications: Gr 4 delivery driver & van - £32,000 per year
Overtime - £7,000 and updated delivery tablets to improve efficiency of service - £1,750

Measure 5: Changes to Absorbent Hygiene Product Collections

- Amend pilot fortnightly nappy collection to include provision of storage bin in addition to provision of purple collection sacks. (Neighbourhood zone teams to subsequently collection nappy storage bins no longer required for recycling going forward, currently 2,756 households have ordered bags); and,
- Delay expansion of AHP separation across all rounds to 24/25.

At present, AHP is only kept separate on the rounds utilising the two pilot 3-compartment vehicles. Extending separation by increasing the number of 3-compartment vehicles would be cheapest in revenue terms (although there would be a large capital outlay), however experience from the trials as fed back by the drivers is that because of their larger size the vehicles are more limited as to where they can go compared to the other split back. Replacing all the split back vehicles with 3-compartment vehicles is therefore not an option. The expansion of separate 'Nappy' collections to all rounds would therefore need to be done by other vehicles such as with non HGV tippers and drivers to separately collect AHP on rounds not covered by the 3 compartment vehicles. The estimated cost of this would be in the order of £260,000 per year which, taken in isolation and in the context of the council's current budget position, is believed to be unaffordable at present. It is consequently proposed to expand the

separation of AHP waste across the county borough in 2024/25 when the financial position is expected to be more favourable.

Financial Implications: Storage bins - £35,000 one-off cost (any replacements to be paid for by existing equipment budget)

Measure 6: Review 'side waste' exemption policy and associated T & C's re: provision of AHP collections and current abuse issues. Also, review litter/waste enforcement policies where required.

Financial Implications: Nil, completion within existing resources

Measure 7: Review receptacles provided for recycling collections:

- A number of different seal designs have been trialled for plastic and cardboard sacks
- Trialled designs not suitable for openings on current collection vehicles (but will be reviewed again with introduction of new vehicles).
- In the meantime: It is proposed to make better marketing of 'do not overfill bags'; 'please use the Velcro to secure'; and 'obtain more bags if needed' (Linked to proposed Measure 2)

Financial Implications: Nil at this stage

Measure 8: Cleaner streets following collections.

It is proposed to action some measures to help keep streets cleaner and to help crews take more ownership of their rounds as follows:

- Compile accurate records of collection rounds and rebalance them where necessary (survey of refuse rounds completed, survey of recycling rounds programmed for April)
- Look at maintaining greater stability of crews allocated to rounds;

- Better messaging associated with adverse weather and wind-blown litter (linked to Proposed Measure 2);
- Maximise the use of wheeled bins where practicable to minimise impact of animals;
- Improve coordination with street cleansing
- In the context that the council does not currently cleanse un-adopted streets/lanes at all – assess the number where we undertake waste collections and the cost of cleaning these as part of Measure 11.

Financial Implications: Nil at this stage

Measure 9: Employ two additional Recycling Awareness and Compliance Officers and:

- Complete 'Collection Point' plotting programme and introduce communal recycling facilities where required/beneficial;
- Roll-out further bin numbering to hotspots;
- Complete current 'front of house' collections trials;
- Continue with further changes to collections from rear lanes to front of house where there are acute rear lane environmental issues if appropriate;
- Increase waste enforcement in rears lanes where collections moved to front of house;
- Review FPN levels for environmental/waste offences

Financial Implications: 2 x Gr 6 officers with vehicles – estimated cost £87,000 per annum

Additional cost for bin labels - indicative one-off cost of £35,000 (further funding could be required for expansion if scheme successful which officers would look to pay for through waste disposal savings as the action plan progresses).

Measure 10: Engage through enforcement those households not taking part in any way in the Council's recycling scheme, and those not participating in the recycling of food waste specifically.

Undertake a pilot of stepped, targeted enforcement in Seven Sisters. (Note: Seven Sisters one of the lowest participating areas for food waste recycling)

The trial would be introduced with explanatory correspondence to all residents in the area, along with general information on recycling and access to additional kit where necessary.

The stepped approach would be:

1. Letter issued to all homes advising residents not to place items which could be recycled in their wheeled bin/bags.
2. Awareness Raising visit(s) to properties not participating
3. Take necessary enforcement action via a Section 46 Notice and Fixed penalty Notices

Financial Implications: Nil. The existing 3 Recycling Awareness and Compliance Officers, plus the above proposed additional 2 officers (Measure 9) would conduct the enforcement action.

[As noted in the All-Member Seminars, there is an estimated 7000 tonnes of food waste in the current 'black bag' and wheeled bin waste that is collected. If 2600 tones could be diverted to recycling via Anaerobic Digestion then the 70% target and the avoidance of WG fines could readily be achieved. If all the food waste could be diverted it would save the Council approaching £1M.]

Measure 11: Prepare a detailed proposal for 3 weekly refuse collections with 3 bag/existing wheeled bin limit, and conduct formal consultation with the workforce and households.

Subject to consultation, finalisation of proposal, and continued sub 70% recycling performance, implement 3 weekly collections in 2024/25 (70% target year). The bulk of the Council's refuse vehicles are due for renewal in 2024/25 and vehicle requirements can be linked in with any change of service provision proposals.

Financial Implications: Notwithstanding a saving in refuse collection vehicles and a saving in material 'disposal', should three weekly collections be implemented and recycling performance improve, it is anticipated the change may still require overall net investment if, for example, the council does not already have weekly AHP collections in place, or the council does not wish green waste collections to be separate and chargeable (to the extent they pay their way). Maintaining green waste and AHP collections at a higher frequency will cost – with potentially three vehicle passes along each street in a refuse & recycling collection week as opposed to the current 2 (that would be, 1 refuse vehicle three weekly & two recycling vehicles weekly). With a delay to 2024/25 then at least Extended Producer Responsibility should be coming in at that time and should meet a proportion of the additional collection costs (albeit subject to a test of efficiency & effectiveness under the funding scheme which is currently not defined)

Measure 12: Amend Garden Waste Policy - Increase cost of green bags to £1.75 (for ongoing two-weekly collections)

Financial Implications: Nil – increase in bag cost would mean charge for bags effectively equals cost of bags which it does not at present.

Measure 13: Continue with booking system at HWRCs

Financial Implications: Nil (there could expect to be a budget increase if the system were removed)

To help with service delivery it is proposed to improve the service IT tablets in use at the HWRCs at a total cost of £2,100.

Measure 14: Improved recovery of recycling from litter waste

- Complete street litter bin and roadside litter composition analysis;
- Assess the likely impact of national DRS (Deposit Return Scheme) and EPR (Extended Producer Responsibility)
- Continue to send litter waste to EfW

Consider application of EPR monies to be provided for street litter to:

- Improve collection of recycling from recycling litter bins;
- Weigh-up litter pickers separating specific materials verses a 'light' pick of litter over a conveyor for glass, cans and cardboard (although DRS may mean that glass & cans disappear).

Financial Implications: Cost of compositional analysis - annual cost of £6.5k for 3 years. (This information will also be important to help make sure the council receives the correct amount of EPR funding to deal with Street Litter once proposals are finalised)

Measure 15: Consider extending battery collections to include small electrical items – whatever will fit in the battery bag:

- Pilot some collections;
- Consider material arising after bedding-in period;
- Consider increasing size of battery bag (Pilot larger bag and dedicated collection stillage under next generation of vehicles)

Expand small electrical item collections if pilot successful.

Note: Our battery processor has confirmed they would not accept a mixed load of batteries and small WEEE (Waste Electrical & Electronic Equipment), although it is noted at current volumes batteries are only collected by our processor twice a year. If small

WEEE and batteries are mixed we would have to separate the two streams prior to sending for reprocessing (or abandon collecting batteries at the kerbside and just collect small WEEE instead).

Financial Implications: The pilot exercise would need to resolve and cost the material separation issue

Measure 16: 'Park' reintroduction of textile collections for now to focus on food waste recovery and other improvements.

Much of the reason the previous textile collections were stopped (as set out in the associated Member report) remains valid. It is also noted that the findings of a recent WRAP Cymru report into textiles collected at the kerbside indicated that the arisings are the lowest quality in comparison to HWRC's and Bring Bank collected material. Also, the market for reprocessing of textiles remains immature with limited capacity. With regards to the anticipated 'trade recycling' regulation changes, the number of business customers within NPT is very small and it is understood access to recycling facilities at HWRC's would be an acceptable route for any trade waste textile recycling.

Financial Implications: Nil

Measure 17: Work with the business unit of Property & Regeneration to complete a feasibility study for provision of a 'Repair/Re-Use' shop in the commercial centres of Port Talbot, Neath and Pontardawe.

Bid to WG for Circular Economy and Transforming Towns monies to implement findings as appropriate (CE grant applications will be available on a rolling basis for two years from April 2023)

Financial Implications: One-off revenue funding of £30,000 for feasibility.

Measure 18: Commission a feasibility for a new improved HWRC site in Port Talbot/Lower Afan Valley area to replace the Cymmer facility and report findings to Members

Financial Implications: One-off revenue cost of £50,000

Measure 19: Complete the service merger of waste collection and transfer station teams, complete Transfer Station site works & implement waste collection fleet move to co-locate with the transfer station in 2023.

Financial Implications: Already agree by Cabinet report of July 2022.

Measure 20: Amend trade waste service to help maximise trade recycling, as trade waste/recycling collected by the council services counts against/towards the Council's recycling target.

The proposals follow a review of the Trade Waste Service and more details are provided in Appendix A.

In summary it is proposed to:

- Make changes to the general level of charges from 1st April 2023: +10% for residual waste charges; Nil increase for recycling waste charges
- Introduce 140l trade bin provision
- End replacement of removed bins with new
- Introduce Recycling Only Contracts
- Introduce charge for clearance of contaminated recyclables

Financial Implications: The proposed charge increases would keep related income in line with costs, while the other main proposals should help promote the Council's trade waste recycling service leading potentially to more take up and income.

Measure 21: The current bulk household collection system was improved and refined following a Systems Review a few years ago and generally works well (some staffing issues associated with Covid in recent years excepted)

The service currently costs £23.50 for a collection and whilst there is currently no definitive limit on the number of items for collection, it is subject to a 'fair use' policy, and in reality the number of items that could be booked for collection was limited by a restricted number of 7 entry lines on the online booking system, filled in either online by the customer or by a contact centre member of staff on receipt of a phone call.

An issue is that as the contact centre has made changes to the system with the aim of reducing calls and 'improving the customer experience'. The changes in the booking system have also led however to an increase in people making 'unfair' use of the system, for example, having building works done such as having laminate floors replaced, or having gutters and fascia boards replaced, or doing clearances, and booking bulk collections for the piles of material that arise. The quantities of material in turn adversely affects the general service for the majority of users. The problem is 'growing' as builders and householders share experience. Whilst it is not intended to start designing the system around a few people trying to abuse it, the system does need to be tightened up in addition to increasing charges in line with significantly increased costs as with other waste collections. As a consequence it is proposed to change the system to a charge of £26.00 for up to 7 items.

Financial Implications: Nil. The cost is 'designed' with the aim of the service being cost neutral.

(There will be a one-off cost of £700 for improved digital tablets used to manage the service a reduction in abuse of the system should meet this)

Measure 22: Word has got around that the council's waste trucks have on-board external CCTV, and there are increasing requests by individuals/insurance companies to see camera footage at specific locations on given days, for example, to investigate alleged vehicle damage on parked cars and the like. The camera information from vehicles is downloaded and checked, and if the claim is erroneous the claimant is informed. Alternatively, if there is evidence of damage by the council vehicle the complainant is directed to the Insurance Section.

Checking the cameras is a lengthy procedure taking up officers' time especially for erroneous complaints. There are occasions also, that residents refute the feedback provided and request to come to the Council offices to view footage for themselves, taking up even more officer time.

It is proposed therefore to introduce a charge for both erroneous claims and for members of the public who wish to view the footage at a flat rate of two hours for the Senior Supervisor time. This proposed flat rate charge would be £40. There would be no charge in the case of footage identifying damage by council vehicles.

Financial Implications: Nil

Financial Impacts:

A summary table of impacts is given below:

| Measure | One-off Capital (£) | Revenue Yr 1 2023/24 (£) | Revenue Yr 2 /Ongoing (£) |
|--|---------------------|--------------------------|---------------------------|
| 1. In-cab data system | 150,000 | 65,000 | 15,000 |
| 2. Recycling Officer & media resources | 0 | 60,000 | 45,000 |
| 3. Dog Fouling Bag provision | 0 | 54,000 | 10,000 |
| 4. Increased delivery capacity | 0 | 40,750 | 39,000 |
| 5. Expand AHP separation (& weekly) | 0 | 35,000 | 260,000 |
| 6. Policy updates | 0 | 0 | 0 |
| 7. Receptacles | 0 | 0 | 0 |
| 8. Potential Mess after collections | 0 | 0 | 0 |
| 9. Two Recycling Awareness and Compliance Officers | 0 | 122,000 | 87,000 |
| 10. Enforce Recycling participation | 0 | 0 | 0 |
| 11. Prepare & consult on 3 weekly refuse for 2024/25 if performance does not improve | 0 | 0 | (260,000) |
| 12. Amend garden waste policy | 0 | 0 | 0 |
| 13. Improve IT for service bookings | 0 | 2,100 | 0 |
| 14. Improve recovery from litter | 0 | 6,500 | 6,500 Yr 2 & 3 only |
| 15. Pilot small WEEE collection | 0 | tbc | tbc |
| 16. 'Park' re-introduction of textile collections | 0 | 0 | 0 |
| 17. Feasibility & bid for reuse/repair shops | 30,000 | 0 | 0 |
| 18. Feasibility for new & improved 'east side' HWRC | 50,000 | 0 | 0 |
| 19. Complete merger of collections/transfer station | 0 | 0 | 0 |
| 20. Trade Waste Service Amendments | 0 | (8,000) | (15,000) |
| 21. Bulk collection changes | 0 | 0 | 0 |
| 22. Vehicle CCTV information charge | 0 | 0 | 0 |
| Total with AHP roll out in 2024/ | 230,000 | 377,350 | 187,400 (*) |

(*) Should be offset by EFW disposal savings and/or EPR monies

Integrated Impact Assessment:

A first stage impact assessment for each measure has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

For reasons of brevity the screening assessments have not been included in this scrutiny task and finish team report. The first stage assessments has indicated that a more in-depth assessment is not required (with the caveat there is a consultation proposed to consider a potential move to three weekly refuse collections)

Workforce Impacts:

There are no adverse workforce impacts associated with this report. The workforce will be consulted regarding a potential move to three weekly collection which it is anticipated would lead to some redeployment of resources from refuse to recycling collection.

Legal Impacts:

The Head of Legal Services has been consulted in relation Measure 10 (Re: enforcement) and feedback incorporated into proposals. Furthermore, the Head of Legal Services will be consulted on any specific changes to policy (Measure 6 RE: 'side waste' and enforcement).

Risk Management Impacts:

An action plan is needed to increase recycling performance in line with statutory requirements. Failure to do so will lead to the risk of substantial annual fines from Welsh Government and reputation damage.

Consultation:

There is no requirement under the Constitution for external consultation on this item. Two all Member Seminars have been held as part of developing the proposals in this report. As part of understanding the issues with any move to three-weekly refuse collections it is proposed to consult the residents and the workforce.

Recommendation(s):

It is recommended that the proposed measures within the report are endorsed by the Scrutiny Task & Finish Group and commended to the Environment, Regeneration and Street Scene Committee.

Reasons for Proposed Decision(s):

It is proposed to report the output of the Task and Finish Group to the E, R and SS Scrutiny Committee in due course.

Implementation of Decision:

Not Applicable.

List of Background Papers:

Environment & Highways Scrutiny Committee report of 28th January 2016 – Side Waste Restriction

Streetscene and Engineering Cabinet Board Report of 20th July 2018 – Waste Strategy Update

Cabinet Report of 30th September 2020 – Kerbside Textile Collections

All Members Seminars and presentations of 13th October 2022 and 16th February 2023

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The review identified a number of issues as follows:

- A) General level of charges
- B) Use of sacks vs smallest bin size for residual collections
- C) Invoicing cycle
- D) Use of coloured sacks for trade sack collections
- E) Replacement of removed bins with new
- F) Recycling Only contracts
- G) Potential contamination of recyclables
- H) Excess waste & service reinstatement fees

Proposals in respect of each issue are detailed below:

A) General level of charges: Trade waste charges are normally reviewed on an annual basis, often simply in line with the Council's corporate uplift assumption of all fees and charges. Costs for collection and subsequent EfW treatment have increased significantly more recently and costs for residual waste collection in particular need to be increased in line with inflation. It is therefore intended to increase collection charges as follows:

10% for residual waste

And,

Nil increase for recycling

In terms of typical commercial bin sizes, this council's costs are already slightly below average and the service can't afford to absorb the significantly increased costs for fuel/vehicles and waste treatment as would be the case for a below inflationary increase on residual waste collections.

B) Use of sacks vs smallest bin size: Currently the smallest bin provided is a 240L bin with any customers producing less waste than a 240L taking up the trade waste sack collection option. There are

currently 202 customers receiving the trade waste sack service some of which are small businesses such as traditional barbers and dog grooming services which produce a very limited amount of waste including a negligible quantity of recyclable material, and in these cases the current system of purchasing trade sacks on an annual basis works well. However there are other businesses that would benefit from the service providing a smaller bin than the 240L currently offered. [There is also currently an incentive for some business to take the minimum service level to secure a 'duty of care' note but then abuse collections and/or use street litter bins to dispose of additional waste.

It is therefore proposed to introduce a 140 Litre trade waste bin option and for this to be the minimum service standard businesses can sign up for where they have storage space for the bin (this will also help with containing wastes in town centres when put out for collection). Only if businesses do not have storage space for the 140ltr bin will a business then be allowed to continue with the use of trade sacks. All 202 trade sack customers would be visited and where they have storage space they would be given the option to convert to a small bin collection or terminate their contract and switch to another service provider.

The current minimum weekly residual waste service level is for a minimum of 52 trade sacks per year which, allowing for a 10% uplift in 2023/24, is £147.40

It is proposed the annual cost for the new weekly 140L bin option in 2023/24 would be:

| | |
|---------------------------------|----------------|
| 140L Rental Charge per year | £ 20.50 |
| 140L Collection Charge per year | <u>£202.25</u> |
| | Total £222.75 |

There would be an upfront cost of £7,000 for an initial stock of two hundred 140L bins (these would go into stock and only be paid for by the service when used).

C) Invoicing cycle: When a new customer signs on for the service, charges are apportioned as a weekly basis to the end of the financial year before moving over to bi-annual invoicing thereafter. Customers also have the option to sign up for a direct debit payment service and these payments are taken over a 10 month period.

It is proposed to maintain this arrangement for the time being.

D) Use of coloured sacks for Trade Collections: Under the current system, businesses that have a fortnightly sack collection purchase the sacks in rolls of 26 bags as and when required (min 1 roll per year). Businesses with a weekly refuse collection also buy bags as required (minimum 2 rolls of 26 per year). The bags are white and branded 'trade waste collection' to enable differentiation by crews from any black bags that might be put out by traders for collection which have not been paid for. It is proposed the use of coloured bags will continue for any trade sack collections.

To honour their waste contract obligations, a business must make their minimum purchase of trade sacks once every year. The date of purchase is input to the trade waste database and reminder letters are sent out to those businesses who have not purchased the required number of sacks for their set period. Businesses who fail to purchase sacks in the required time frame are then put "on stop" and their agreements terminated until the required sacks are purchased.

To order sacks, businesses are required to telephone the contact centre who take payment over the telephone and email a job delivery sheet over to the Trade Waste section. Alternatively, the businesses can contact the Trade Waste section directly and provide a cheque on delivery.

E) Replacement of removed bins: Under the current system, when bins are removed from site due to non-payment then when the customer resumes collections following payment, they are delivered new bins. This increases the number of bins used from stock and the costs for replacement stock/refurbishment of the trade bins. It is believed in some cases that customers have taken advantage of this 'mechanism' to receive new bins. It is proposed that any bins removed for non-payment will be stored at Cymmer Depot/Tawe Terrace for 12 months so that if a service is resumed the customer receives the same bins by return.

F) Recycling Only Contracts: The service does not currently offer recycling only contracts for customers who do not 'produce' any residual waste. They are not specifically disallowed under current policy but it has always been assumed to date that businesses will at least produce some residual waste and they should have a residual waste contract with the council to have recycling collections. As businesses start to turn progressively 'green' where they can, it is considered that the Council should now offer recycling only contracts to those business that have gone fully green (or alternatively just want to take their residual waste business elsewhere). Recycling services provided by the private sector are generally higher in cost and in some cases traders are taking up the minimum residual waste contract with the council, when they are using a private section company of residual disposal, just so they can access recycling services. One example is that Neath Town Centre business have a Duty of Care checked residual contract with Veolia but have also signed up for a minimum residual waste contract with the council to access recycling collections for plastic, cans, glass and cardboard. The introduction of recycling only contracts would stop the need for this.

From April 2023 or as soon as possible thereafter, it is therefore proposed to introduce the option for Recycling Only trade waste contracts for those customers that can demonstrate that they only produce recyclable waste, or that they are using a private sector

company for their residual waste. Duty of Care notes issued to businesses with recycling only contracts will be limited in coverage to recyclables and organics.

G) Contamination Charge: Some materials put out for trade waste recycling collections are unfortunately contaminated and have to be rejected by the collection crews (and this issue may increase with the introduction of 'recycling only' contracts. Where containers of waste materials are rejected, traders have the option to sort them and represent uncontaminated materials for collection, or, where they have residual collections, put the contaminated waste out for their next regular residual waste collection (albeit if they then exceed their contracted waste collection volume they can receive an excess waste charge). Some traders however require the contaminated recyclable removed on the day of collection. In these circumstances it is proposed to introduce a contaminated recyclables collection fee as part of the terms and conditions of trade agreements, at a cost of £78, for an ad-hoc residual collection to be made to deal with the contaminated waste.

H) Excess Waste and Reinstatement Fees: There is currently provision under the trade waste terms and conditions to charge customers a fee for excess waste that is presented, which is payable prior to collection of the excess waste being made. This charge, although part of the terms and conditions, has not been widely applied and should be. The service needs to be more stringent on applying this charge to discourage excess waste and encourage customers to amend their contracts accordingly to the volume of waste they actually produce, and the proposed 'in-cab live feed system' will facilitate and make it much easier to apply excess waste charges. This similarly applies with respect to reinstatement fees for customers who have their service reinstated following non-payment.

It should be noted that if Measure 1 is approved, the use of 'in-cab' data will enable the crews to collect in line with any changing Trade

Waste Agreements signed by commercial premises and make the reporting of excess and contaminated presentation more efficient.