

## **Cabinet – 16 December 2015**

### **Waste Service Options Report**

**Portfolio:** Councillor L Harrison

**Related portfolios:** None

**Service:** Clean and Green

**Wards:** All

**Key decision:** Yes

**Forward plan:** Yes

#### **1.0 Summary**

- 1.1 Refuse and recycling collection is one of the most high profile and highly valued services provided by the Council. Financial pressures have necessitated that the Council review how it delivers this service.
- 1.2 At its meeting on 26 February 2015 Council approved the budget for 2016/17 to help deliver significant savings required by the Medium Term Financial Strategy. Detailed within the budget was a proposal to change the waste and recycling collection service to one involving Alternate Weekly Collections (AWC).
- 1.3 An options appraisal of AWC was subsequently undertaken during the Summer of 2015 and two options were identified for detailed consideration:
  - Option 1 – Bin Swap - Swapping garden waste and residual waste bins so that the 140 litre grey bin becomes used for garden waste and the 240 litre brown bin becomes used for general waste, with the 240 litre green bin remaining for recyclable waste and all bins collected alternate weekly.
  - Option 2 – No Bin Change - 140 litre residual waste bins collected alternate weekly with larger bins for larger families
- 1.4 On 22 July 2015, Cabinet approved the proposed strategy for consulting with residents on their preferred option. A wide and detailed programme of consultation on how AWC could be delivered was undertaken between 6 August and 30 September 2015. Consultation was mainly quantitative (by questionnaire) with a lesser degree of qualitative (face to face) consultation

also taking place. The scientific approach to data collection means that the results are representative at the borough level and robust and accurate to within a small and predictable range.

- 1.5 The outcome of the consultation process determined that half of the residents (50%) preferred Option 2, and just over a third (35%) preferred Option 1. The remaining 15% preferred another option, which was to retain the existing service. The full consultation report is attached at **Appendix A**.
- 1.6 The Council is required to meet the requirements of the European Commission's Waste Framework Directive (WFD) as transposed by the Waste (England and Wales) Regulations 2011 in relation to recycling collections and material streams. This is explained in more detail in paragraph 3.4 of this report.
- 1.7 The earliest implementation date of Option 2 is October 2016.

## **2. Recommendations**

- 2.1 That Cabinet notes the outcomes of the public consultation about changes to the household waste collection service and approves the change in the service to implement Option 2 - No bin change, all bins emptied every other week.
- 2.2 That Cabinet approves the TEEP Statement of Compliance pursuant to the to the Waste (England and Wales) Regulations 2011 (**Appendix B**) subject to the award of the contracts detailed within the Contracts for Treatment, Recycling and Final Disposal of Municipal Waste Report also included on this agenda.
- 2.3 That Cabinet notes the estimated financial savings of implementing Option 2 are circa £921,000 per annum, with part year savings of £520,500 in 2016/17.
- 2.4 That Cabinet approves the changes to the Council's Waste Policies required to implement the new service as detailed in section 3.5.
- 2.5 That Cabinet approves £36,600 of funding from 2015/16 under spends within Clean and Green and £135,000 from waste volume reserves to fund additional short term resources to implement the new service including additional customer Contact Centre support, providing education and waste audits and completing the delivery of additional/replacement bins for larger families.
- 2.6 That Cabinet approves £653,470 of funding for additional/replacement bins via the Council's 2016/17 Capital Programme to be funded from financial borrowing (£380k) and E & E waste reserve revenue contribution (£273,470), with approval for award of the contract delegated to the Executive Director Economy and Environment.

- 2.7 That Cabinet approves the draft Implementation Timeline which includes Communications, Waste Audits, Bin Deliveries and Start Date as set out in section 3.6 below.
- 2.8 That Cabinet approves the outline Communications Plan based on the details set out in section 3.7.
- 2.9 That Cabinet asks the Corporate and Public Services Overview and Scrutiny Committee to review and comment on the Implementation Plan and Communication Plan prior to the launch of the new service.
- 2.10 That Cabinet agrees for minor variations to be made to the waste collection policies, the implementation plan and the communication plan by the Executive Director, Economy and Environment in consultation with the Portfolio Holder Clean and Green.

### **3.0 Report detail**

#### **3.1 Council Responsibilities**

- 3.1.1 As a Unitary Authority, Walsall Council has a responsibility to make arrangements for both the collection and disposal of municipal waste.
- 3.1.2 Section 45 of the Environmental Protection Act 1980 places a duty on the Council to collect household waste and Section 48 of the same Act places a duty on the Council to provide a place for the disposal of such waste.
- 3.1.3 This report should be read in conjunction with the Contracts for Treatment, Recycling and Final Disposal of Municipal Waste Report also included on this agenda.

#### **3.2 Options appraisal**

- 3.2.1 In December 2014 Cabinet received a report seeking approval to start the procurement process for contracts for the treatment, recycling and final disposal of municipal waste. The procurement process triggered a review of the service as required by the Waste Framework Directive and approval was given to officers to undertake a service options review relating to future service delivery.
- 3.2.2 At its meeting on 26 February 2015 Council approved the budget for 2016/17 to help deliver significant savings required by the Medium Term Financial Strategy. Detailed within the budget was a proposal to change the waste and recycling collection service to one involving alternate weekly collections.
- 3.2.3 In April 2015 an options appraisal of alternate weekly collections was undertaken and following discussions with the Portfolio Holder two suitable options were identified;

- Option 1 – Bin Swap - Swapping garden waste and residual waste bins so that the 140 litre grey bin becomes used for garden waste and the 240 litre brown bin becomes used for general waste, with the 240 litre green bin remaining for recyclable waste and all bins collected alternate weekly.
- Option 2 – No Bin Change - 140 litre residual waste bins collected alternate weekly with larger bins for larger families.

3.2.4 A summary of the options appraisal is attached as **Appendix D**.

3.2.5 As both options would represent a significant change to the service residents receive, public consultation was required.

### **3.3 Public consultation**

3.3.1 On 22 July 2015, Cabinet approved the public consultation strategy to consult the public on the two options. Public consultation was carried out between 6 August and 30 September 2015.

3.3.2 Questionnaires were sent to a random sample of 10,000 properties from which a healthy response rate of 31% was achieved, representing 3,043 valid responses; and meaning that the data is robust and statistically accurate at the borough level to within a small margin of error (1.7%).

3.3.3 In addition to the random postal survey, anyone could have their say via an open online survey and paper questionnaires made available at various public events and venues throughout the borough. The survey was also sent to members of the People's Panel, a 500 strong online panel. In total 853 responses were received through these additional consultation channels.

3.3.4 After taking everything into account, when asked which option for alternate weekly collections residents preferred, half (50%) preferred Option 2 and just over a third (35%) preferred Option 1. The remaining 15% preferred another option, most wanting to keep a weekly collection. It is therefore considered that more residents prefer Option 2, with some groups having reservations about coping with reduced capacity of the residual waste bin.

3.3.5 Of the residents who felt Option 2 did not meet their needs (43%), most said it was because the 140 litre grey household waste bin is likely to be full to capacity before the next collection date. Those groups of households where this was a key concern were households of 3 and 6+. This issue can be mitigated by providing a larger 240 litre bin for households of 3 and a 360 litre bin for households of 6 or more where they satisfy the requirements of a waste audit and associated education process. The waste audit and education process will involve officers visiting households to advise residents which items of waste should be deposited into each bin and how the capacity of bins can be maximised by squashing containers etc. **Appendix C** details

how the size of bin provided will be determined based on the size of the household.

3.3.6 Additionally, to mitigate the concerns of households who already have a larger bin (6 plus occupancy), it is proposed to issue a 360 litre bin to these households who need additional capacity following a waste audit and education process. See **Appendix C**.

3.3.7 Approving the use of additional larger bins to mitigate public concerns will be likely to have a negative impact on the level of savings by increasing the amount of waste entering the general waste stream and therefore increase the associated costs. These costs cannot be quantified at this time. Actual costs will depend on the outcome of the waste audits and the number of additional bins provided in line with the new policy.

3.3.8 The full public consultation report is attached at **Appendix A**.

### **3.4 Compliance with the European Commission's Waste Framework Directive (WFD) and Waste (England and Wales) Regulations 2011 – Recycling Collections and Material Streams.**

3.4.1 The Council must meet the requirements of the European Commission's Waste Framework Directive (WFD) and Waste (England and Wales) Regulations 2011 – Recycling Collections and Material Streams. In particular, if the Council does not carry out separate kerbside collections of papers, glass, cans and plastic, it must prove that:

- The co-mingled collection service delivers material to the equivalent quality of a separate kerbside collection (the Necessity Test) or;
- That it is not Technically, Environmentally and/or Economically Practicable (TEEP) to do so. Officers have reviewed the preferred option and it is not deemed technically, environmentally and/or economically practicable to move to separate collections and as such the Council is complying with this legislation.

3.4.2 Walsall Council does not carry out separate collections but collects mixed (co-mingled) material at the kerbside in a 240 litre wheeled bin. Current interpretation is that, as co-mingled recycling collections comply with the Waste Framework Directive, it can be evidenced that separate collections are not technically, environmentally and/or economically practicable (TEEP) and a high quality recycle can still be achieved.

3.4.3 Any proposed change of service must be TEEP compliant. The current proposal only affects the frequency of residual waste collections (grey bins) and not the recycling service. The award of the co-mingled recycling disposal contract, as recommended in the Contracts for Treatment, Recycling and Final Disposal of Municipal Waste report, also presented to this Cabinet, will allow the waste collection service to remain TEEP compliant.

3.4.4 The TEEP compliance statement is attached at **Appendix B**.

### **3.5 Policy Changes**

3.5.1 In selecting Option 2 as the preferred option, and considering the outcomes of the consultation process, it is considered that some of the council waste collection policies need to be amended. The policies to be amended are detailed below:

#### **3.5.2 Standard service for individual properties**

The Standard Service for the collection of domestic waste from individual properties is an alternate weekly service using:

- 140 litre wheeled bins for residual waste.
- 240 litre wheeled bins for dry recycling and
- 240 litre wheeled bins for garden waste, collected on a seasonal basis

The bins provided are as follows:

- Residual domestic waste (rubbish which cannot be recycled) – grey wheeled bin.
- Dry recycling for specific items only as defined by the Council – green wheeled bin
- Compostable garden waste – brown wheeled bin

The correct bin must be used for the right type of waste. The bins provided must not be used to dispose of business waste.

The garden waste service operates during the growing season and is suspended for part of the year. The Council reserves the right to suspend the compostable garden waste service at its discretion.

#### **3.5.3 Additional capacity for residual domestic waste**

The Standard Service for the collection of domestic waste from individual properties allows the following bin capacities:

- 140 litre wheeled bins for residual waste.
- 240 litre wheeled bins for dry recycling
- 240 litre wheeled bins for garden waste

Residents can request additional capacity to the standard service based on the number of people in permanent residence at the property as set out in **Appendix C**.

Residents can also request additional capacity to the standard service if large quantities of non hazardous hygiene waste are generated

When additional capacity is authorised the existing wheeled bin will be exchanged for the larger wheeled bin free of charge. All households that request additional capacity will have to complete a declaration as to how they meet the criteria. Checks are likely to be made on any application and may include:

- A waste audit to ensure the household is utilising the recycling bins as much as possible.
- A check on the names listed permanently residing at the property
- Site visits to provide education and advice and ensure the information is still relevant

Additional capacity will only be approved on the agreement that the household makes full use of the recycling service.

Additional capacity will be supplied on a conditional basis, which will be reviewed periodically. If circumstances have changed, the additional capacity may be removed.

3.5.4 The impact of the new policies will have a reduction in level of savings that can be delivered, due to more households receiving larger bins and less waste being recycled. This cannot be quantified until implementation is complete.

3.5.5 The new policies will also require additional larger bins to be purchased. Robust arrangements in respect of applications and waste audits will be applied to ensure the minimum number of larger bins is required and recycling is maximised.

### **3.6 Implementation plan**

3.6.1 The proposed implementation of the new service will commence with a communication launch in June 2016 with the scheduled start of alternate weekly collections in October 2016.

3.6.2 The draft implementation timeline with indicative dates is detailed below.

<b>Activity</b>	<b>Date</b>
Cabinet Approval	16 December 2015
Round Design / Route Optimisation	Jan - Mar 2016
Procurement of Additional Bins	April 2016

Launch Publicity for new Service / Request Applications for larger Bins	June 2016
Provision of additional Contact Centre Resource	June - November 2016
Main Communication to Residents	August - September 2016
Carry out Waste Audits / Education	July - December 2016
Deliver larger bins where necessary	August - September 2016
Implement new Service (including day change)	3 October 2016
Ongoing support to residents	October - December 2016

3.6.3 A detailed and updated implementation plan will be prepared and agreed in consultation with the Portfolio Holder and Executive Director Economy and Environment.

### 3.7 Communications Plan

3.7.1 There will be a comprehensive information campaign before any service change is implemented to ensure residents are aware of the changes and when they will be implemented. This will involve providing information to as many recipients as possible including partners, community groups and households. Leaflets, newspaper articles, website publicity, public advertising, social media and other mechanisms will be used to get the message to residents.

Below is an overview of some of the planned communication activities:

<b>Communication Activity</b>	<b>Aim of Communication</b>	<b>Method</b>	<b>Planned Date</b>
New service launch	Advise residents of the changes to waste collection service to all Walsall residents	Leaflet Social Media Web Site	June 2016
Seek applications for larger bins	Advise residents of opportunity to apply for larger bin	Leaflet Social Media Web Site Public Advert	June 2016
Carry out education and waste audits	Advise residents how to minimise waste and address concerns with	Additional physical resource on site	June – Dec 2016



	the new service		
Answer Frequently Asked Questions	Answer residents' questions and concerns on new service	Web Site	June 2016 onwards
Implement new service / Deliver larger bins	Advise residents about changes to their waste collection service and give collection dates and details	Leaflet / Information pack	August - September 2016

3.7.2 A detailed and updated communication plan will be prepared and agreed in consultation with the Portfolio Holder and Executive Director Economy and Environment, based on this outline plan.

#### **4. Council priorities**

4.1 The Council Purpose is to "Improve lives and life chances for everyone who lives and works in the Borough of Walsall and in so doing minimise the help that residents need from the state"

4.2 The change to AWC will contribute to delivering the new priorities by creating safe, sustainable and inclusive communities by:

- Reducing waste to landfill.
- Maximising recycling collections.
- Reducing traffic movements of large good vehicles, saving fuel and reducing carbon footprint.
- Reducing the frequency of bins presented for collection.
- Minimising health and safety risks by reducing vehicle movements.

#### **5. Risk management**

5.1 There are significant risks involved with the changes to front line services, particularly services that affect every household in the borough. The following information highlights risks that have been identified and details how the risks will be mitigated.

##### **5.2 Public acceptance**

5.2.1 Some residents will view the new service as a reduction in service delivery and may be reluctant to cope with and accept service change. A fifth of all

respondents didn't support any option for alternate weekly collection and hence will prove to be a hard to please cohort whatever change was needed.

- 5.2.2 The public consultation process identified concerns over matters such as hygiene/smell, vermin, pests, flies and maggots etc. These are common concerns with the introduction of AWC but positive communications and education will help to mitigate this. Over 180 local authorities have introduced alternate weekly collections and many initial concerns are overcome by advising householders to wrap food waste prior to disposal and ensure bin lids are kept closed.

### **5.3 Quality of material (contamination)**

Option 2 means that the capacity for households to place their residual waste will reduce which may lead to an increased risk of cross contamination into the recycling and garden waste streams. Contamination has been factored into the new co-mingled materials contract but there is a limit to how much contamination contractors will accept at their Materials Recycling Facilities. Excessive contamination and particularly food waste deposited in the recycling bin can have a significant impact on recycling percentages and costs, with whole loads being contaminated and sent to landfill or for incineration. Increased communications and collection monitoring will be required to minimise the risk.

### **5.4 Round reviews**

In order to optimise operational efficiencies collection rounds will need to be reviewed and re-modelled moving towards area based working. Approximately 80% of households will experience a day change to their collection day. At the start of the new service it is likely a minority of households will place their bins for collection on the wrong day. While this should be a short term risk, good communications and providing additional Contact Centre resource and scaling up staffing levels during the initial period will help mitigate the risk.

### **5.5 Increased Customer Contacts**

During the lead up to the implementation of the new service it is likely there will be a significant increase in calls to the Contact Centre and demands for waste audits and educational visits, with members of the public seeking clarification about the new service and requesting larger bins etc. This risk will be mitigated by recruiting additional temporary Recycling Encouragement Officers and Contact Centre staff working within Business Support, to deal with these enquiries.

### **5.6 Impact on Household Waste Recycling Centres (HWRC)**

It is likely that some waste not collected at the kerbside will be diverted to HWRCs, at least in the short term, which will put more pressure on the sites particularly at peak periods such as weekends and Bank Holidays. This impact on the HWRC sites will be monitored.

## **5.7 Waste Framework Directive (WFD)**

**5.7.1** There is some risk of legal challenge under WFD if co-mingled collections fail to comply with the standards required under the TEEP process. Were such a challenge successful it may be necessary to reintroduce kerbside sort collections. This would have a lead in time of approximately 12 to 18 months to become operational and would have a significant increase in cost.

**5.7.2** The main risk is the quality of the co-mingled materials. To mitigate against this risk, bidders for the new co-mingled materials contract are required to demonstrate that they can sort materials to the quality required by the WFD.

## **6. Financial implications**

### **6.1 Savings from Alternate Weekly Collections**

**6.1.1** The implementation of Option 2 will deliver an estimated saving of circa £921,000 per annum, (this will be circa £520,500 in 2016/17 due to the earliest implementation date being October 2016). The actual saving will be dependent upon several factors including:

- Disposal costs from the diversion of residual waste to recycling.
- The cost of recycling disposal calculated following the recent re tendering exercise and considered under a separate report to this Cabinet.
- Route optimisation and re-modelling to quantify the number of rounds required to deliver the new service.
- The policy and uptake for the provision of bigger bins for larger families. The uptake of larger bins will be managed with robust arrangements in respect of applications and waste audits, ensuring the minimum number of larger bins are purchased and recycling is maximised.

**6.2** Actual savings will not become clear until the end of 2016/17 when the new service has bedded in.

### **6.3 Capital Investment**

**6.3.1** To implement the new alternate weekly collection service, and taking into consideration the feedback from public consultation, it will be necessary to procure additional bins for larger households and households who produce medical waste.

6.3.2 The table below (based on the 2011 census) details the estimated number of households with 3, 4, 5, and 6 people or more.

<b>People per Household</b>	<b>Number of Households</b>
3	17,410
4	14,457
5	5,958
6 or more	4,018

6.3.3 Assuming a 40% take up rate as at present and based on the proposed policies where waste audits are required and a full take up where no audit is required, the estimated number of additional bins required and associated costs is as follows:

<b>People per Household</b>	<b>Size of bin</b>	<b>Additional Bins Required</b>	<b>Cost</b>
3	240 litres	7,000 x £18	£126,000
4	240 litres	14,457 x £18	£260,226
5	240 litres	5,958 x £18	£107,244
6 or more	360 litres	5,600 x £35	£196,000
Reuse of 240 litre bins	240 litres	2,000 x £18	(£36,000)
<b>Total</b>			<b>£653,470</b>

6.3.4 The number of larger bins identified is an estimate based on current take up rates and will be minimised following the application and waste audit process. Bins will be procured via a Framework arrangement, ensuring the minimum number of bins will be purchased at the lowest cost.

6.3.5 The Waste Service Options and Procurement Strategy – Interim Report to Cabinet on the 22 July 2015 identified £463k was required for the procurement of larger bins. The additional capital cost for the purchase of larger bins is now circa £190,000. The majority of this cost (£126,000) is attributable to providing larger bins for families of 3 which was not included in the original proposal.

6.3.6 In summary, by introducing the new policies detailed within this report the estimated maximum capital requirement will be £653,470 to be funded from

financial borrowing (£380k) and E & E waste reserve revenue contribution (£273,470).

## 6.4 Implementation Costs

6.4.1 In order to implement the new service, a “one off” cost of £171,600 is required to fund additional short term resources. This funding will come from a carry forward of Clean and Green under spends from 2015/16 and waste volume reserves.

6.4.2 The costs associated with the implementation are detailed below

Activity	Cost	Comments
Providing additional communications	£30,000	2 communications of 2 sets of information to include calendars etc at £25k per occasion. Some funding from existing communication budget
Providing additional Contact Centre support	£33,600	2 additional officers for 26 weeks Plus additional support from directorate Business Support
Providing education and waste audits for residents to minimise the requirement for larger bins and maximise recycling	£51,000	26 weeks (July – December) for 3 employees plus existing Recycling Encouragement Team
Completing the delivery of additional/replacement bins for larger families	£32,000	Based on 8 week distribution Aug / Sept for Driver and 2 Environmental Operatives supported by existing Street Cleansing Resources
Providing additional front line resource to facilitate the transition of the service change	£25,000	Based on 2 mop-up crews of Driver plus 2 Loaders working Oct / Nov supported by existing Street Cleansing Resources
<b>Total</b>	<b>£171,600</b>	

6.4.3 These costs are an estimate and are subject to change. Any additional costs will be absorbed within existing Clean and Green budgets.

## 7. Legal implications

7.1.1 The Council’s duties and responsibilities for the collection and disposal of municipal waste has been set out at parts 3.1.1 and 3.1.2 of this report. The proposed service complies with these duties.

- 7.1.2 The Council's requirements for recycling collections (i.e. waste paper, metal, plastic or glass), pursuant to Regulations 13 and 14 of the Waste (England and Wales) Regulations 2011, include a requirement that as from 1 January 2015, it must take all such measures to ensure separate collection of such waste.
- 7.1.3 The Council does not carry out separate collections but collects mixed (co-mingled) material at the kerbside in a 240 litre wheeled bin. Current interpretation of the above Regulations is that co-mingled recycling collections comply providing it can be evidenced that separate collections are not technically, environmentally and economically practicable (TEEP) and a high quality recyclate can still be achieved.
- 7.1.4 Any proposed change of service must be TEEP compliant. The current proposal only affects the frequency of residual waste collections (grey bins) and not the recycling service. The award of the co-mingled recycling disposal contract to Casepak as recommended in the Contracts for Treatment, Recycling and Final Disposal of Municipal Waste report also presented to this Cabinet, will allow the waste collection service to remain TEEP compliant.
- 7.1.5 The TEEP compliance statement is attached at **Appendix B**.
- 7.1.6 The European Union has issued their intention to amend European waste legislation within their proposed "circular economy package" which is likely to change the regulatory framework for waste disposal and impose additional recycling targets on local authorities. These proposed legislative changes were released on 2 December 2015 and the Key elements of the revised waste proposal include:
- a common EU target for recycling 65% of municipal waste by 2030
  - a common EU target for recycling 75% of packaging waste by 2030
  - a binding landfill target to reduce landfill to maximum of 10% of all waste by 2030
  - a ban on landfilling of separately collected waste
  - concrete measures to promote re-use and stimulate industrial symbiosis –turning one industry's by-product into another industry's raw material
  - economic incentives for producers to put greener products on the market and support recovery and recycling schemes (eg, for packaging, batteries, electric and electronic equipment, vehicles).

These proposals are likely to have a future impact on the Council's waste collection and disposal arrangements and further consideration and review will be necessary once the impact of the legislation becomes clear.

## **8. Property implications**

None arising from this report.

## **9. Health and wellbeing implications**

Although there are public perceptions that alternate weekly collections create issues with hygiene, smell, vermin, pests, flies, maggots and similar hazards, if simple measures are followed (such as wrapping food waste) there should be no health and wellbeing implications.

## **10. Staffing implications**

There are no ongoing staffing implications with this change in service. Whilst the overall number of Environmental Operatives reduces by 15, the reduction of posts is mitigated by the deletion of vacant posts currently occupied by agency labour.

Temporary resources will be required to support the implementation of the new service as detailed in section 6.4 above.

## **11. Equality implications**

Due to a service change, under the Public Sector Equality Duty a public consultation and an Equality Analysis (**Appendix E**) are required and are detailed within this report.

## **12. Consultation**

- 12.1 Public consultation is covered in the main body of the report and detailed in **Appendix A**.
- 12.2 The results of the public consultation were presented to Corporate and Public Services Overview and Scrutiny Committee on 22 October 2015 and the cross party Committee:
  - Noted the 'outcomes of public consultation on alternate weekly collections of residual household waste and
  - Expressed a preference for Option 2 as contained within the report presented to it.
- 12.3 The Corporate and Public Services Overview and Scrutiny Committee will also be asked to review and comment on the Implementation Plan and Communication Plan prior to the launch of the new service in June 2016.

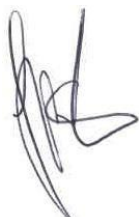
## Background papers

- Corporate and Public Service overview and Scrutiny Committee 22 October 2015 Alternate weekly collections of household waste - outcomes of public consultation.
- Cabinet Report 22 July 2015 Consultation Options for the Possible Change to the Residual Waste Collection Service.
- Cabinet Report 17 December 2014 Contracts for Treatment, Recycling and Final Disposal of Municipal Waste.
- Cabinet Report 17 December 2014 Compliance with the Waste Framework Directive and Waste (England and Wales) Regulations 2011 – Recycling Collections and Material Streams.

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Simon Neilson  
Executive Director



14 December 2015

Councillor L Harrison  
Portfolio Holder



14 December 2015



# **Alternate Weekly Collection Consultation – report of findings**

**October 2015**



**Walsall Council**

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## Introduction

Walsall Council needs to make savings of £82 million over the next four years, and from October to December 2014, we asked our residents how these savings could be made.

One of the savings options put forward was to start emptying household waste (rubbish) bins every other week instead of weekly. In February 2015 Walsall Council approved this savings option and during August and September we asked residents, no matter what type of home they live in, what they thought of the proposed options.

Two different collection options were put forward to help deliver the savings, and between 6 August and 30 September 2015, householders were consulted on which of the two options they would prefer.

### Fig. 1 Option 1 – Bin Swap

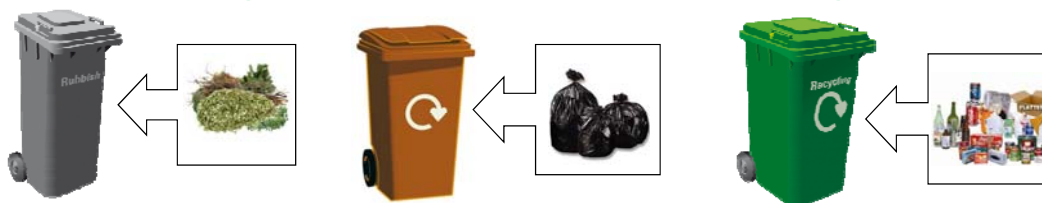
The 240 litre brown bin becomes your general waste bin. Households without a brown bin would be provided with one and would be collected every other week.

The 240 litre green recycling bin stays the same, collected every other week.

The 140 litre grey bin becomes the garden waste bin, collected every other week (currently April to November).

In line with current policy any overfilled bins or bins with the wrong sort of waste in them would not be collected. This option would save an estimated £736,000 a year.

### Option one – Bin swap



Grey bins would be used for garden waste

Brown bins would be used for general waste

Green bins stay as recyclable waste

**All bins collected every other week**  
(garden waste currently April – November)

### Fig. 2 Option 2 – No bin change - all bins emptied every other week

General waste, recycling and garden waste bins stay the same, but all bins would be emptied every other week (garden waste currently collected April to November). Households of 4 or more would be able to apply for a larger 240 litre grey bin for general waste.

In line with current policy any overfilled bins or bins with the wrong sort of waste in them would not be collected. This option would save an estimated £921,000 a year.

## Option two – No bin change



**All bins collected every other week**  
(garden waste currently April – November)

This report summarises the key findings of research among a representative sample of Walsall residents aged 16+. The survey was conducted by Walsall Council with all data processing completed by Pro-Tel Fieldwork Ltd.

The research explored behaviours and attitudes towards waste disposal as well as views on two options put forward for alternate weekly collections. Ultimately, the data will be used to inform how an alternate weekly collection service will operate.

Specifically, the questionnaire examined the following:

- Type of wheeled bin ownership
- Wheeled bin use including how often present for collection and capacity on collection
- Disposal habits of different types of waste
- Views on options for alternate weekly collections
- Concerns about moving to alternate weekly collections
- Preferred option for alternate weekly collections or alternatives
- Household demographics including gender, age, ethnicity, disability / illness, accommodation type, number of people in household and car / van ownership.

## The postal survey

The research took place through a postal survey of residents in the borough who receive a residential waste collection service using standard wheeled bins.

A sample of 10,000 addresses was drawn from the council's Mayrise database used for managing residential waste collections. A 6-page questionnaire and covering letter (see Appendices) were sent out to each address in the sample on 6 August 2015. No reminder was issued.

The response rate achieved from the sample was 31% which represents 3,043 valid responses.

Data were weighted back to the known population profile of Walsall to counter-act non response bias. Data are weighted by age within gender bands, ethnicity, household size as well as the proportion of households with larger bins and assisted collections. The weighting profile was based on the 2011 Census for age within gender, ethnicity, household size.

## Statistical reliability and margins of error

The survey was designed to be representative at borough level and therefore analysis at this level is accurate to within 1.7%. For more information see the section 'statistical reliability' at the end of this report.

The respondents to the questionnaire are only samples of the total "population", so we cannot be certain that the figures obtained are exactly those we would have if everybody had been surveyed. But we can predict the variation between the sample results and the "true" values from knowing the size of the samples on which the results are based and the number of times that a particular answer is given.

The base size – i.e. the number of respondents providing a valid response – was different for each question answered in this survey. The number of respondents for each question is shown on the questionnaire in Appendix A.

Sub-level analysis, particularly where bases (the number of people answering the question) are low should be treated with caution when interpreting the results. Percentages based on a small number of people can be misleading. Results are available at ward level but are of insufficient size to warrant any detailed analysis, but may be used to inform the roll out of the new collection service.

**Percentages may not total 100% due to questions being multiple response or computer rounding. Figures indicated with \* are less than 0.5%.**

## Additional research

In addition to the random postal survey, anyone could have their say via an open online survey and paper questionnaires made available at various public events and venues throughout the borough. The survey was also sent to members of the People's Panel, a 500 strong online panel. As this approach is not random, i.e. there was no control over who could respond or how many times, the results may not be generalised to the wider population. The findings are therefore presented separately in the appendices of this report. In total 853 responses were received.

## Summary of key findings

### Executive summary

- Overall there is a preference for Option 2: No bin change and all bins are emptied every other week.
- After taking everything into account, when asked, which option for alternate weekly collections residents preferred overall; half (50%) preferred Option 2 and just over one third (35%) preferred Option 1. The remaining 15% preferred another option for household waste collection.
- Of those who do not feel Option 2 meets their needs (43%), most of those people said it was because the 140 litre grey household waste bin is likely to be full to capacity before the next collection date.
- Of those who don't feel Option 1 meets their needs (48%), most of these people think that the garden waste bin (140 litre grey bin) would not be big enough, rather than there being issues with decreasing their bin capacity for disposal of household waste and collecting this every other week.
- Other general concerns about moving to alternate weekly collections boil down to 3 key issues;
  - perceived issues with people fly-tipping,
  - hygiene/smell and
  - vermin, pests, flies, maggots.
- Generally speaking older people and smaller households (2 or less) are likely to feel Option 2 meets their needs, our assumption being that there is sufficient capacity with the existing grey and brown bins to meet their needs. 61% of the borough's households (65,979) are made up of 2 person households<sup>1</sup>.
- Generally speaking, younger people, and smaller sized households (2 or less) are likely to feel Option 1 meets their needs, our assumption being that swapping the bins gives sufficient capacity to meet their needs.
- Most residents agree that households of 4+ should be able to apply for a bigger 240 litre capacity bin.
- The proportion of residents who say option 2 doesn't suit their needs, compared to the borough overall, rises significantly amongst households of 3 persons (of which there are 17,410 within the borough according to the 2011 census), larger

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<sup>1</sup> 2011 Census

households of 5+ occupancy (of which there are 9,976 according to the 2011 census), households who already have a larger (240 litre) grey bin (approximately 2,000 according to current refuse collection data) and households with children. Hence there are three key issues here;

- Households of 3 people who are under the threshold for a proposed larger 240 litre grey bin.
  - Households of 5+ who are concerned about how they will cope, even though they could apply for a larger 240 litre bin.
  - Households of 6+ who already have a larger 240 litre grey bin, who are perhaps unclear about how Option 2 caters for their needs.
- Just under one fifth of residents (19%) said 'yes' Option 1 and or Option 2 met the needs of their household. Whilst, a similar proportion of residents (17%) said 'no' neither Option 1 nor Option 2 met their needs. The latter representing a hard to convince cohort of people who may not respond well to any service change and hence for which a strategy to ensure they come on board with future changes will be important.

## Main findings

### Preference for an overall option

**Overall there is a preference for Option 2: No bin change and all bins are emptied every other week.**

After taking everything into account, when asked, which option for alternate weekly collections residents preferred overall; just under half (50%) preferred Option 2 and just over one third (35%) preferred Option 1.

The remaining 15% preferred another option for household waste collection; and those saying this were asked to outline their suggestions for how a household waste collection service might operate, making savings of around £1 million a year. Of which most just wanted no change at all and to keep weekly household waste collections.

*“All bins and collection stay the same”*

*“I think the bin service should stay as it is”*

*“Keep the existing collection routine, it worked fine for me. Tell the government to stop cutting budgets that affect cleanliness and hygiene.”*

Further comments were low in frequency and very wide ranging in their nature, none of which would make the level of saving required. The comments can be themed as being;

**Theme 1:** Preferring Option 2 but with other considerations e.g. waste weekly in summer/coloured bags for excess/council clean the bins/garden monthly

*“Option 2 fine in colder or cool weather but household waste needs emptying every week during hot weather.”*

*“Get council to clean bins out for us (at a small fee) have bin bags for food bin (inner) liners.”*

*“Option 2, garden waste could be collected monthly.”*

**Theme 2:** Bin size; All households have the option of a 240 litre general waste bin, larger households to have larger bins or two bins.”

*“Taking option 2, but everyone to get 240 litre grey bin. Council will still make a saving and no effect on volume of disposal.”*

*“Everyone to have three 240 litre bins.”*

*“Each household should be given larger grey bin. This way there would be no confusion as in brown now being grey etc. and alternative weekly collections would be more viable.”*

**Theme 3:** Frequency of collection; various suggestions i.e. general waste weekly or recycling weekly or recycling less frequently or swap bins but retain weekly collection.

*“General waste collection must be weekly. Other waste bins may be collected every other week.”*

*“I would suggest a monthly brown bin collection and leave the green and grey as they are.”*

*“General waste needs to be collected weekly, but cut down on green and brown collections.”*

**Theme 4:** Better housekeeping; save costs elsewhere; salaries, we pay our council tax.

*“Council tax is already too high so suggest look at reducing council bureaucracy rather than services!”*

*“Waste collection is an essential service and savings should be made in other areas.”*

*“Walsall council staff to have a pay cut to make savings and leave bin collection alone.”*

**Theme 5:** Charge for garden waste service, sell garden waste.

*“Charge for brown bin collection”*

*“When we lived in Nottingham, we had 3 large bins all emptied alternate weeks and the system worked fine. They introduced a £25 p.a charge for the garden bin to be emptied. We were happy to pay this to get the service we required. So why not introduce a charge for the brown bin, give everyone a large grey bin - or charge for a large grey bin.”*

**Theme 6:** Education and enforcement; to encourage more recycling and composting and to allay concerns about increased fly-tipping.

*“Making sure the bins all contain the right waste and recycle items, impose fines if not.”*

*“Encourage households with gardens to compost household waste and use it as fertiliser.”*

*“Make residents who do not recycle face prosecution. Treat with fines or court action.”*

***Who prefers Option 2: No Bin Change: all bins collected every other week; essentially smaller households because they can cope with the capacity and older residents because they can cope with the capacity and also retain their larger sized garden waste bins***

Preference for Option 2 increases with age, and is significantly higher than the borough overall (50%) amongst older residents, with preference for this option rising to 68% for those aged 56-75 and to 78% to those aged 76+. Preference for this option is also lower than the borough overall (50%) amongst those aged 55 and below; 16-35s (31%) and slightly below for the 36-55s (46%).

Others who have a strong preference for this option includes one person and 4+ person households; 62% and 60% respectively. Those with a disability (59%), households with



children (54%) and also those living in detached/semi-detached properties (54%) or flats, maisonettes or apartments (56%).

Residents who currently don't put their grey for general waste and green for recycling bins out every collection but who do put their brown for garden waste bin out every other week are more likely to also prefer Option 2; 73%, 63% and 61% respectively, indicating that they are comfortable with alternate week collections across all bins. Especially amongst those where their grey and green bins aren't full to capacity when they are put out; 57% and 53% respectively.

***Who prefers Option 1: Bin swap: all bins collected every other week; essentially younger households and smaller households because residual waste capacity is more important than garden waste capacity.***

The proportion preferring option 1 decreases with age, with 47% of under 35s saying they prefer this option compared to 38% of 36-55 year olds, 23% of 56 to 75 year olds and just 12% of those aged 76+.

Others who have a strong preference for option 1 include households with 2 (38%) and 3 occupants (50%) reflecting the fact that under this option they would get a larger 240 litre bin for household waste (with the 140 litre grey bin being used for garden waste), whereas under option 2 they would not be eligible for a larger 240 litre bin.

The proportion preferring option 1 increases amongst households that are home to someone with a disability (38%) and households with children (41%) compared to households who do not have occupants of this type.

In addition the proportion of residents preferring option 1 increases amongst those whose grey bin is full on collection (50%), is collected every collection day (38%) and for those who do not put their brown bin out every collection (47%) clearly illustrating that disposal of household waste and capacity takes a priority over garden waste.

## **Issues of overall concern about moving to alternate weekly collections (regardless of whether Option 1 or Option 2)**

***Concerns about moving to alternate weekly collections boil down to 3 key issues; perceived issues with people fly-tipping, hygiene/smell and vermin, pests, flies, maggots.***

Residents were asked about the extent to which certain issues associated with moving to alternate weekly collections for household waste concerned them. When looked at 'on balance' between those who were not concerned at all, compared to those showing concern (slightly/very), the resulting net score (Table 1), highlights three issues that stand out as being of greatest concern;

- People fly-tipping,
- Vermin/pests/flies/maggots, and
- Hygiene/smell.

<b>Table 1: Net score ('% slightly/very concerned' minus '% not at all concerned')</b> Q17 Extent to which, if at all, do the following concern you about moving to alternate weekly collections (every other week) for your general waste?			
Potential concern	Not at all concerned <sup>1</sup>	Slightly/Very concerned <sup>2</sup>	net score
People fly tipping	10%	87%	+77
Hygiene/smell	13%	86%	+73
Vermin / pests / flies / maggots	13%	86%	+73
People leaving bins out between collections causing an obstruction	33%	65%	+32
Confusion over which bins to put out when	54%	44%	-10

<sup>1+2</sup> Please note figures do not total 100% as 'don't know' are excluded from net score calculation

In contrast, 'people leaving bins out between collections causing an obstruction' is a much lesser concern than the three key issues, though it shows some concern about this exists. Especially amongst those aged 56-76, BME groups, larger households (5+ occupants), those with a disability, those living in terraced streets, flats/maisonettes or apartments.

Whilst 'confusion over which bins to put out when' is the least concerning issue as more people are not concerned about this issue than are concerned. This issue is also the easiest to mitigate through good communication at time of service change.

***The three key concerns, fly-tipping, hygiene and vermin; are recurring issues across residents' comments, they tend to be of general concern across communities, but especially for larger families.***

In terms of who in particular is concerned about people fly-tipping, it's fair to say that this is a general concern to all residents. However, there is significance in the proportion of residents from larger households being very concerned about people fly-tipping (79%) compared to the borough overall (63%). Concern is also heightened amongst those whose bins are full to capacity when they are put out.

*"Fly-tying is already a problem, which will get worse. It will cost more money to clean up the rubbish which has been fly tipped."*

*"I think there would be a large amount of fly tipping."*

*"I would be worried to see an increase in fly tipping. The council would need to keep on top of this."*

Similarly, residents are generally concerned about hygiene and smell issues, often allied to concerns with vermin/pests/flies/maggots with again larger households and where

household waste bins are full to capacity when put out show heightened concern for these issues.

*"The smell that would ensue from a fortnightly collection."*

*"Smell/hygiene - maybe increased collection during summer months."*

*"Foxes and rats will be attracted by the smells."*

*"I am not happy that the grey bins are going to be emptied every other week as this will cause a lot of problems such as smell, over loading and maggots."*

*"We will have rats in the back garden; all bins should be collected each week."*

### Other concerns about alternate weekly collections

There was an additional question that asked 'do you have any other concerns about alternate weekly collections for general waste for you or the borough'; and most respondents (73%) didn't provide any comments, of the 37% of that did comment just under a third said they had no further concerns or indicated they were happy (8%).

*"None at all if it saves you money."*

*"As long as I can get my green bin put out then I am happy."*

*"I think it's a good idea if it will save money that can be used elsewhere."*

Of the remainder providing thoughts, there were a wide range of comments, but these were spread fairly evenly across three key issues;

**Theme 1:** Smell, vermin, health hazard and hygiene concerns especially in the warmer weather.

*"Serious risk to hygiene and pests. Nowhere to store waste which cannot fit into the bin."*

*"You'll have cats, dogs and foxes ripping bags open because people will have nowhere to store bags they can't fit in the bins. So streets will become messy with rubbish."*

**Theme 2:** Environmental concerns; people fly-tipping, additional trips to the tip, people burning excess waste, other people using their bins.

*"Extra fly tipping all over borough which is a burden and causing additional cost."*

*"Others using your bins when they have filled their own."*

**Theme 3:** Overflowing bins and needing to leave extra black bags of rubbish lying around.

*"I think you'll have black bags of rubbish left all over the place when people can't get them in bin, I think it's a bad idea."*

*“Bins will be overfilled and then the public will be putting their rubbish in additional bags which will attract vermin.”*

Amongst a smattering of other comments that were wide ranging and low in frequency were:

- Collection days being missed due to bad weather/holidays.
- Requests not to change the current service,
- Make savings elsewhere,
- Confusion over bin usage caused by swapping, including the need for clear information,
- The need for enforcement and education,
- The council taking a step backwards in its service delivery,
- Offering all households 240 litre bins,
- Service needs to be reliable,
- Concerns about bin obstruction and call for operatives to return bins properly on collection days, causing issues for the elderly, those with medical conditions.

*“Bank holiday periods may need to be revised or extra collections made. Never expect us to keep waste more than 2 weeks.”*

*“If a collection is missed it could then be a month.”*

*“This should not be an option, carry on as now please.” “Why change a good service.”*

*“Better enforcement of certain households not putting correct waste in bins/not recycling.”*

*“It would be harder for people with disabilities and for pensioners.”*

*“Put new stickers on the bins to remind people what goes in what bin and what items cant.”*

## How options impact the needs of individuals

When residents were taken through each option individually and the extent to which either Option 1 or 2 met their needs was explored further; results showed the following;

*Generally speaking, younger people, and smaller sized households are more likely to feel Option 1 meets their needs. However where option 1 doesn't their meet needs, the greatest impact is stated as being the reduced capacity for garden waste disposal, particularly amongst older age groups.*

### Option 1: Bin Swap: all bins collected every other week

Residents were divided on whether or not Option 1 met their needs, with just under half saying 'yes' it does meet their needs (48%), whereas just over half (52%) said 'no' it does not.

Of those who don't feel Option 1 meets their needs, (71%) think that the garden waste bin (140 litre grey bin) would not be big enough, rather than there being issues with decreasing their bin capacity for disposal of household waste and collecting this every other week.

*"To have the grey bin for garden waste would not be big enough unless collected weekly. Smaller grey bin right size currently for family of 4 who recycle."*

*"The smaller bin would not hold all the garden waste if emptied once a fortnight especially during the summer months."*

*"This option would not meet our needs. Surplus space for household waste but not enough capacity for garden waste."*

Any other concerns residents have exist to a far lesser extent. However, their next concern reiterates that they have issues with the reduction in garden waste bin capacity with just under one third (29%) saying there is **'nowhere to compost garden waste that doesn't fit in the smaller bin'**.

Where residents directly comment about their composting issues, they say they haven't the space to compost, they are already composting as much as they can, or they tend to link issues with dislike of repeated trips to the tip or indeed their inability to get to the tip. The research also tells us that over two thirds of all residents (71%) do not home compost their garden waste, hence there is potential to develop this across the borough in order to alleviate reduced garden waste bin capacity as a result of the bin swap.

*"Grey bin not large enough for garden waste. Nowhere to compost extra waste. No transport to visit tip."*

*"We would be left with more garden waste then we can compost."*

*"I have two compost bins but no room for more and in truth do not break down garden waste quickly enough. Therefore I have no option but to make more frequent trips to the tip, than I do now."*

One quarter (26%) also say they are **'unable to get to the tip to dispose of additional waste'**. Of these, yet unsurprisingly, concern rises significantly amongst those who do not have access to a car (65% compared to 18% who do have a car).

A further 17% of those who did not feel Option 1 met their needs say the **'general waste bin (240 litre brown bin) would not be big enough'**. With many of these showing concern about over-spilling waste, issues with pests/vermin, smell because of issues with food waste.

*"If it is collected every other week I think the bin would smell and would not be big enough to hold all of our household waste."*

*"General waste would be overflowing; extra waste would attract foxes, rats and cats to damage bags and scatter waste."*

*"Two weeks waste would not fit in the brown bin. Rotting food waste on the premises for two weeks would encourage vermin."*

Finally 1 in 10 residents (10%) say that they **'would need assistance to move the bigger/heavier general waste bin (240 litre brown bin)'**.

*"Only if I can wheel bins from my back garden to outside gate I have Osteoporosis. Larger bins would be too heavy"*

*"I would find it difficult to move a heavy bin that has two weeks of waste in it, I live alone. I also think the grey bin would be too small for garden rubbish."*

*"Overload of garden waste and not able to get rid of general waste as the bin is too heavy"*

### **Whose needs does Option 1 (Bin Swap) suit or not suit?**

Suitability of Option 1 reduces with age, so this option is more likely to suit younger residents (35s and under) (59% compared to 48% for the borough overall). Whilst those aged 36-55 are just as likely to suit Option 1 (47%), however, it is less likely to meet the needs of those aged 56 to 75 (39%) and even more so those aged 76+ (36%).

Based on comments, older residents feel the garden waste service is important to them and they can't get to the tip to dispose of excess garden waste, they also worry about managing a heavier household waste bin, that they don't really feel they need a bigger grey bin for household waste.

*"As a 92 year old widow I have a normal amount of waste and recycled waste, however the garden waste is still the same and I am unable to take it to the tip."*

*“The smaller grey bin is big enough for my needs. I prefer a larger brown garden waste bin.”*

Those with a disability are more likely to say option 1 doesn't meet their needs (59% compared to those without a disability 49%). Those already with a larger 240 litre grey bin are significantly more likely to not like option 1 (81%) compared to those with a standard 140 litre bin (51%).

*“It doesn't accommodate for people with medical issues using adult pads/nappies, in which case we would need a bigger bin and have weekly collections”*

*“We already have a larger grey bin and we are a family of 7 and just about manage at the moment.”*

*“We already have a 240 litre grey bin which is filled to capacity and emptied weekly, so option one would in effect halve rubbish space each week.”*

Those not in favour of option 1 increases significantly amongst those who put their brown bin out every collection day (75%) and that it is full to capacity (76%), indicating that the crux of the issue with this option for these residents is having a smaller garden waste bin in future (140litre grey bin).

Those not in favour of option 1 are also more likely to live in detached / semi-detached accommodation (58%) compared to other types of accommodation, perhaps reflecting that these houses that are more likely to have gardens than other types of accommodation.

There is no significant difference by ethnicity or amongst households containing children or not, neither car ownership in preferences for this option.

## **Option 2: No bin change: all bins collected every other week**

*Generally speaking older people and smaller households are more likely to feel Option 2 meets their needs. However, where Option 2 doesn't meet needs, the greatest impact is stated as the 140 litre grey household waste bin will be full to capacity before the next collection date with associated concerns about storing and disposing of excess waste and hygiene/smell issues attracting vermin.*

In terms of Option 2, more than half (57%) of residents agreed that Option 2 met their needs, the remaining 43% said this option doesn't suit their needs.

Of those who do not feel Option 2 meets their needs, the majority (87%) said that the 140 litre grey household waste bin is likely to be full to capacity before the next collection date.

On looking at their comments, they also worry about vermin, smell and hygiene issues, with some complaining about inconvenient tip opening hours.

*“We already have the large bin and it is full to capacity every week”*

*“I have a 240 litre bin (grey) it is already full by next week.”*



*“Do not want food waste hanging round for 2 weeks. Smell will attract vermin (foxes, cats)”*

*“Recycling centre closes Tuesday and Wednesday when I need it”*

Household waste bin capacity was of particular concern to larger households (5+ occupancy) (94%), and those who said their grey household waste bin was already full to capacity (91%). Though this was far less likely to be of concern amongst older people; those aged 76+ (58% compared to the borough overall 87%).

Of their lesser concerns, one third (33%) said that they would be ‘unable to get to the tip to dispose of additional general waste that does not fit in the grey bin’.

There was only a smattering of comments related to inability to get to the tip and comments tended to centre on a disdain of using the tip especially when already paying Council Tax for a waste collection service anyway.

*“I could get to the tip but work 60-90 hour weeks and shouldn’t have to.”*

*“Would not like to put general waste into a new car to dispose of any excess to the tip”*

*“Should not have to take general household waste to the tip - paying for the service”*

Inability to get to the tip was significantly more of a concern amongst older (aged 76+) residents (64%), those living in one person households (40%), with a disability (46%). In addition also for those who say that they don’t currently put their Grey household waste bin out every collection day (56%).

1 in 10 (10%) residents said they would need assistance to move bigger / heavier bins those comments about this were not at all prevalent.

*“I am 91 and frail”*

*“Smells and bins too heavy”*

Residents aged 76+ are significantly more likely to say that moving heavier bins was a concern (56%), as are those receiving an assisted bin collection (42%), also for single person households (28%), those with a disability (24%), residents living in a flat, maisonette or apartment (26%), and those without access to a car (22%).

The remaining (13%) of residents offered other reasons why Option 2 doesn’t meet their needs, however, further comments were low in frequency and very wide ranging in their nature, but can be summarised as being;

- Concerns about vermin/ pests, hygiene and smell issues
- Frequency – needing weekly collections
- Don’t want change as current service is what meets needs
- General waste bin would be too big
- Not feasible for larger households



- Paying already through council tax for a weekly service and hence expect it to remain.
- Issues regarding getting confused

### *Whose needs does Option 2 (No Bin Change) suit or not suit?*

Suitability to Option 2 increases significantly in older age, so that those aged 56-75 and those aged 76+ are significantly more likely to say this option meets their needs; 74% and 87% respectively when compared to borough overall (57%). Younger residents (16 to 35) are far more likely to not like Option 2 (62%).

Smaller households are also more likely to prefer option 2; with one person households' particularly feeling this option meets their needs (73%). However, the proportion of residents who say option 2 doesn't suit their needs is significantly higher amongst households of 3 persons (64%), household with children (61%), and larger households (5+ occupancy) (55%) and households who already have a larger (240 litre) grey bin (66%) compared to borough overall (43%). Hence there are three key issues here;

- Households of 3 people who are under the threshold for a proposed larger 240 litre grey bin.
- Households of 5+ who are concerned about how they will cope, even though they could apply for a larger 240 litre bin.
- Households of 6+ who already have a larger 240 litre grey bin, who are perhaps unclear about how option 2 caters for their needs.

Residents are more likely to say option 2 meets their needs where they are not putting their grey and green bins out every collection day (94% and 80% respectively compared to borough overall; 43%). Conversely, residents whose green bins are full to capacity when presented are significantly more likely to say option 2 doesn't meet their needs (69% compared to borough overall 43%).

### *Most residents agree that households of 4+ should be able to apply for a bigger 240 litre capacity bin*

With Option 2 the proposal includes provision for larger households (4+) to apply for a larger capacity 240 litre grey bin for their general household waste. All respondents were asked if they think that households composing of four or more occupants should be able to apply for a larger bin for general waste; with the vast majority 82% agreeing with this; 18% did not agree with this approach.

However for those who did not agree that households with 4+ occupants should be able to apply for a larger grey bin, there was quite a mixed opinion about what the threshold should be. So that 29% said no household (apart from those who produce medical waste) should be able to apply for a larger bin for general waste, whilst (27%) said threshold should be 6 or more person households, (25%) suggesting another household size; most frequently proposing a smaller household threshold, and (20%) saying 5 person households should be the households eligible to apply.

Interestingly, looking in more detail at what residents who felt the threshold for eligibility to a larger 240 litre grey bin should be, not unsurprisingly households of 4 and 5+ were significantly more likely to agree threshold should be 4+ households (92% and 95% respectively compared to those who said yes (82%). With households of 3 people significantly more likely to disagree that the threshold for a larger bin should be 4+ households (32% compared to those who said no 18%). This reflects the larger proportion of 3 person households who say option 2 doesn't meet their needs, on the threshold of eligibility for a larger 240 litre grey bin.

## Profile of bin usage

### The household waste services residents have access to

The vast majority of residents currently have access to the standard range of bins for household waste management, a standard grey (140 litre) bin for general waste available to 96% of residents; collected weekly. In addition, a standard green (240 litre) bin for recycling available to 91% of residents; collected every other week, and a standard brown (240 litre) bin for garden waste available to 80% of residents also collected every other week April to November.

There are smaller proportions of residents with access to a larger grey (240 litre) bin for general waste (4%), of which there is an equal proportion, half for whom this caters for their 'larger' family needs<sup>2</sup> the other half because of medical waste purposes; these bins are currently collected weekly. There are a very small proportion of residents (0.2%) with a communal/shared bin.

4% of residents said they received an assisted bin service. Unsurprisingly, those receiving this service are predominantly older residents aged 76+ (12%), is more likely to be received by one person households (8%), and households with (5+ occupancy) (8%). Also those with a disability (10%), and with no access to a car (10%), those with a larger 240 litre grey bin (32%).

Younger people aged 16-35 are significantly less likely to say they have green (85%) and brown bins (71%), compared to the borough average (91%). BME groups are also less likely to have a green bin (83%).

BME groups are more likely to have a larger 240 litre grey bin (8%) compared to borough average (4%).

### How residents use the household waste service

When asked about how often people put their bins out (regardless of whether they are full or not), overall, compared to other bins, residents are more likely to put their green recycling bins out on every collection day i.e. every other week, with the vast majority (90%) doing this. Only slightly fewer; (88%) put their grey general waste bins out every collection day; i.e. weekly. However, this proportion falls dramatically to just over half

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<sup>2</sup> Households of 6+ occupancy

(55%) putting their brown garden waste bins out every collection day; i.e. every other week currently between April to November.

### Resident characteristics and usage of Green bins for recycling

Characteristics of those who are less likely to put their GREEN recycling bins out every collection day compared to borough overall (90%); generally speaking are older residents in smaller households and accommodation types, BME groups, older residents, though more specifically;

- Older residents (aged 76+) (86%),
- Those from BME groups (81%)
- One person households (76%),
- Those living on flats, maisonettes or apartments (74%),
- Households with disabilities (88%)
- Households without a car (85%)
- Where their green bin is not full to capacity (85%)
- Those who also don't put their grey bins out every collection (60%)

Characteristics of those who are more likely to put their GREEN recycling bins out every collection day generally speaking are larger families, though more specifically;

- Larger families generally including; Households of 4 and 5+ (both 99%), those who have a larger 240l grey bin (96%), households with children (95%)
- Those who put their grey bins and brown bins out every collection; 95% and 97% respectively
- More likely their green bin is full (97%)
- More likely to be compressing their waste than not (93%)

### Resident characteristics and usage of Grey bins for general waste

Characteristics of those who are less likely to put their GREY household waste bins out every collection day compared to the borough overall (88%) generally speaking are older residents, single person households, though more specifically;

- Older residents (aged 76+) (80%),
- One person households (70%)
- Those also not putting their green bins out every collection (47%)
- Where their green bins are not full to capacity (81%)
- Those living in flats, maisonettes or apartments (71%),

Characteristics of those who are more likely to put their GREY household waste bins out every collection day generally speaking are younger residents and larger families, though more specifically;

- Younger residents (16-35) (92%)

- Larger families generally including households (3 occupants; 93%), (4 occupants; 98%) rising to 99% for those with 5+ occupants. Households with children (96%), and those who have a larger 240 litre grey bin (95%).
- Those who also say their grey and green bins are full to capacity; 97% and 93% respectively.

### Resident characteristics and usage of Brown bins

Characteristics of those who are less likely to put their BROWN garden waste bins out every collection day than the borough average (55%) generally speaking are younger to middle aged residents, BME groups, larger families, living in terraces accommodation though more specifically;

- Younger residents (16-35; 39%) and middle aged (36-55; 49%)
- Those from BME groups (39%)
- Larger (5+) households (42%)
- Households with children (46%)
- Those living in terraced housing (36%)
- Those who don't put their grey and brown bins out every collection day, 40% and 18% respectively.
- Those who have a full grey bin (48%)

Characteristics of those who are more likely to put their BROWN garden waste bins out every collection day generally speaking are:

- Older people; 56-75 (69%), 76+ (73%).
- Those with a disability (61%)
- Those with a brown bin that's full to capacity (75%)
- Those living in detached / semi-detached accommodation (60%)

### How residents normally dispose of their household waste

Bearing in mind the purpose for which the various bins are provided and the guidance on what can be disposed of in each bin, it is pleasing to note that the vast majority of residents correctly dispose of their waste in the correct coloured bin (see table 2).

<b>Table 2: How do you normally dispose of each of the following items?</b>					
<b>Waste</b>	<b>Grey wheeled bin</b>	<b>Green wheeled bin</b>	<b>Brown wheeled bin</b>	<b>Some other way</b>	<b>Don't have this waste</b>
Paper and cardboard	3%	96%	1%	1%	1%
Glass bottles and jars	3%	97%	*	1%	1%
Food and drinks cans and foil	12%	89%	*	1%	*
Recyclable plastic bottles and tubs	3%	96%	*	1%	1%

Textiles / clothes	27%	6%	*	56%	12%
Food waste	93%	1%	2%	3%	2%
Garden waste	4%	1%	87%	5%	6%

There are a small minority of residents who are either incorrectly disposing of, or could better dispose of some types of waste and hence there is potential for further advice and guidance to be targeted towards those audiences that would have the potential to increase recycling rates, release capacity in grey general household waste bins which helps mitigate changes to the frequency of collection and avoid contamination of materials.

Whilst over half of residents (56%) do not use their wheeled bins to dispose of clothes / textiles, using some other method, a large proportion (27%) dispose of textiles / clothes in their grey bin taking up valuable space. This presents an opportunity for further education and awareness raising to divert textiles away from grey bins e.g. via charity shops, clothes banks, up-cycle / reuse for a different purpose. 6% wrongly put clothes / textiles in the green bin.

Another issue that will help residents to increase the capacity of their bins is whether or not they compress and flatten the waste they put into their green bin. Only just over half (56%) said 'yes' they always do this, however a significant proportion, 38% do this only 'sometimes', or 'never' (6%) do this.

In comparison those aged 16-35 are most likely to always flatten / compress their recyclable waste (60%) and are also most likely to have a full green bin when they put it out for collection (71%).

Characteristics of those who are less likely to always compress / flatten waste before putting it in their green bin compared to borough overall (56%); generally speaking are smaller, older households, though more specifically;

- Green bin not collected every week (39%)
- Green bin not full on collection (43%)
- One person households (49%) two person households (53%)
- Older residents aged 76+ (50%)
- Have a larger bin for medical waste (52%)
- No children in household (53%)

The results reflect that smaller households tend not take measures to maximise their green bin capacity through compressing / flattening waste as lack of capacity is not an issue for them.

At borough level overall, 6% never compress / flatten their recyclable waste, specifically they include;

- Live in flat / maisonette / apartment (22%)
- Do not put green bin out every collection (21%)

- Do not put grey bin out every collection (14%)
- Single person households (12%)
- Older residents aged 76+ (8%)
- No children in household (7%)

When asked whether they compost any garden waste at home in a compost bin / heap; well over two thirds (71%) said 'no' they don't do this, (19%) said they do home compost their garden waste, whilst 10% stating 'they don't produce garden waste'. Whilst 93% of residents put their food waste in their Grey bins and 4% put garden waste in their Grey bins, there is some potential to encourage more home composting of appropriate organic garden and food waste in order to release some capacity in household waste bins.

Compared to those who do not compost in the borough overall (71%), those least likely to compost garden waste at home include:

- Households of three (80%)
- Brown bin not full on collection (80%)
- Don't put brown bin out every collection (78%)
- Those in terraced house (77%)
- Those aged 76+ (76%)

**The Neither/Either viewpoint is interesting particularly the 'Neither' cohort of people who are going to be hard to please/may not respond well to any service change**

An interesting perspective to explore are those people who neither prefer Option 1 nor Option 2, and also those who actually showed a preference for either Option 1 & 2; and then how this view balances in the overall opinion.

Just under one fifth of residents (19%) said 'yes' Option 1 and or Option 2 (referred to as 'Eithers'), met the needs of their household. Whilst, a similar proportion of residents (17%) said 'no' neither Option 1 nor Option 2 (referred to as 'Neithers') met their needs.

'Neithers' therefore representing a hard to convince cohort of people who may not respond well to any service change and hence for which a strategy to ensure they come on board with future changes will be important.

'Neithers' are worriers and show significantly higher levels of being 'very concerned' about moving to alternate weekly collections than the norm. Notably issues relating to hygiene, small and vermin, which are probably more so 'fears' rather than reality and issues which could be easily mitigated with advise on disposal, keeping lids down etc

'Eithers' are more likely to prefer Option 2 than the general population as they display characteristics that mean they are adaptable to this change, younger, smaller households and have grey bin capacity to cope with the Grey bin for household waste being collected every other week.

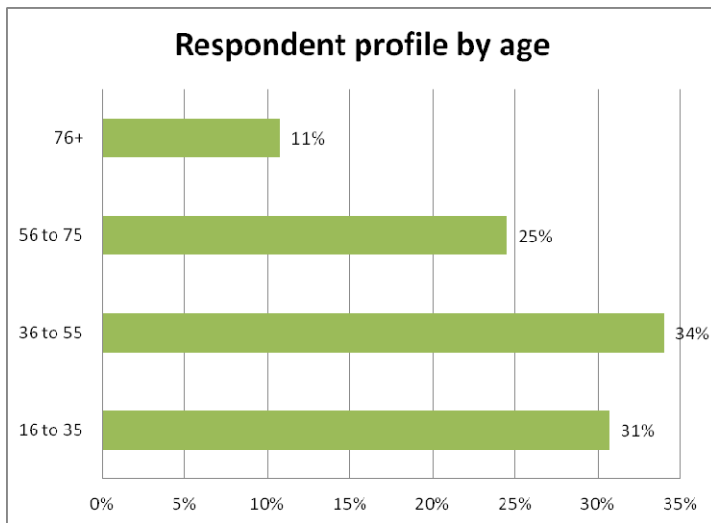


<p>The EITHER pleasers (19%) are happy with either option</p>	<p>The NEITHER pleasers (17%) are unhappy with either option</p>
<div data-bbox="167 342 502 448">Younger age groups (under 55s)</div> <div data-bbox="544 342 719 398">Males</div> <div data-bbox="288 472 624 542">White ethnic groups</div> <div data-bbox="159 573 414 716">Living in flats / maisonette or apartment</div> <div data-bbox="456 566 719 725">Smaller households without children</div> <div data-bbox="185 752 694 853">Put all bins out less often than every collection day</div> <div data-bbox="159 884 477 1030">Present all bins at less than full capacity</div> <div data-bbox="520 920 719 1014">Put textiles in grey bin</div> <div data-bbox="185 1059 710 1126">Sometimes flatten / compress waste</div> <div data-bbox="261 1158 659 1290">Households of 4 or more should be able to apply for a larger bin</div> <div data-bbox="150 1330 341 1440">Prefer option 2</div> <div data-bbox="368 1323 719 1467">In favour of raising the larger bin criteria to 6 or more in households</div> <div data-bbox="167 1505 719 1615">Generally not concerned about moving to alternate weekly collections</div>	<div data-bbox="874 342 1243 434">Younger age groups (under 35s)</div> <div data-bbox="1276 360 1452 427">Females</div> <div data-bbox="919 479 1401 542">Black and minority ethnic groups</div> <div data-bbox="887 577 1141 736">Larger sized households with children</div> <div data-bbox="1166 577 1437 736">Living in detached/semi detached</div> <div data-bbox="887 768 1418 880">Slightly more likely to have an assisted bin collection</div> <div data-bbox="957 920 1347 1030">Put all their bins out every collection day</div> <div data-bbox="887 1059 1141 1308">To dispose of textiles in some other way than in their bins</div> <div data-bbox="1166 1106 1422 1265">To present their bins full to capacity</div> <div data-bbox="874 1323 1141 1655">To say that the general waste bin (240 litre brown bin) would not be big enough</div> <div data-bbox="1166 1323 1501 1576">More likely to worry about pests/vermin/ smell and hygiene issues</div> <div data-bbox="1136 1637 1513 1803">Very concerned about moving to alternate weekly collections</div> <div data-bbox="874 1830 1513 1989">Say 'no' that households of 4 or more should not be able to apply for a larger bin for general waste</div>

## Respondent Profile

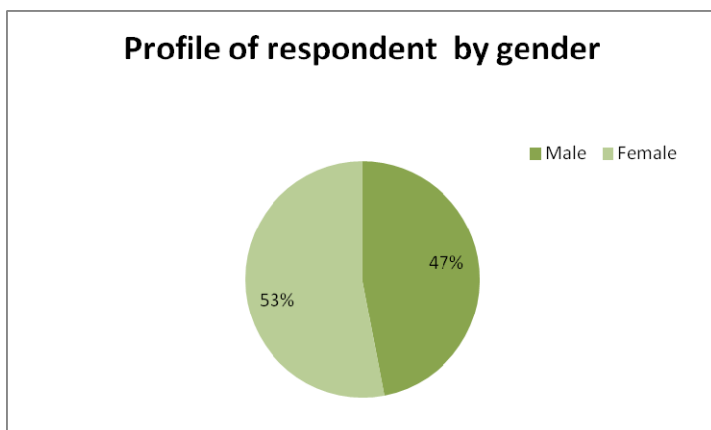
### Age

Q22 What was your age on your last birthday?



### Gender

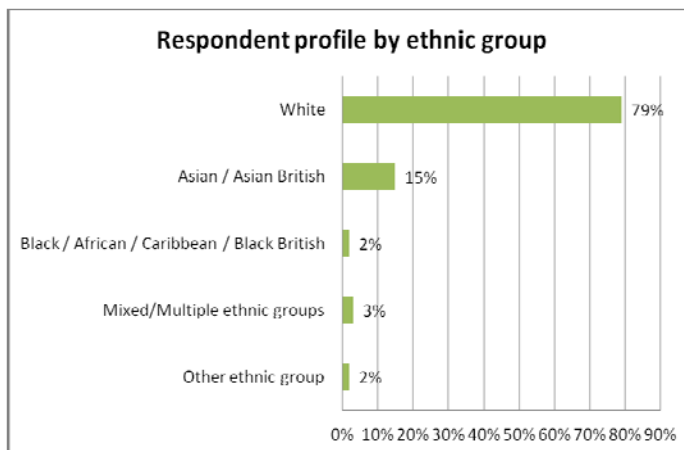
Q23. Are you male or female?





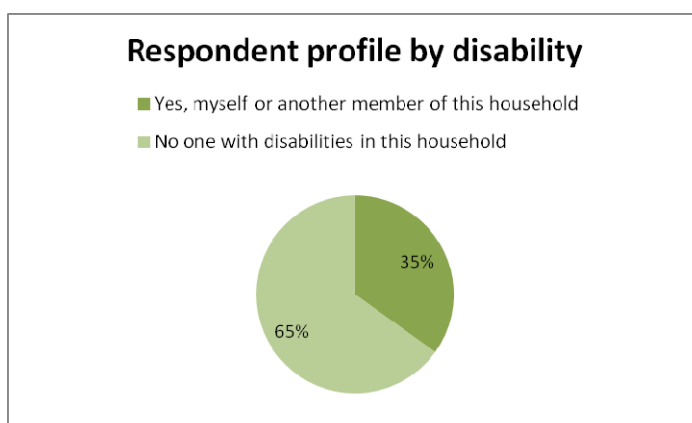
## Ethnicity

Q24. What is your ethnic group?



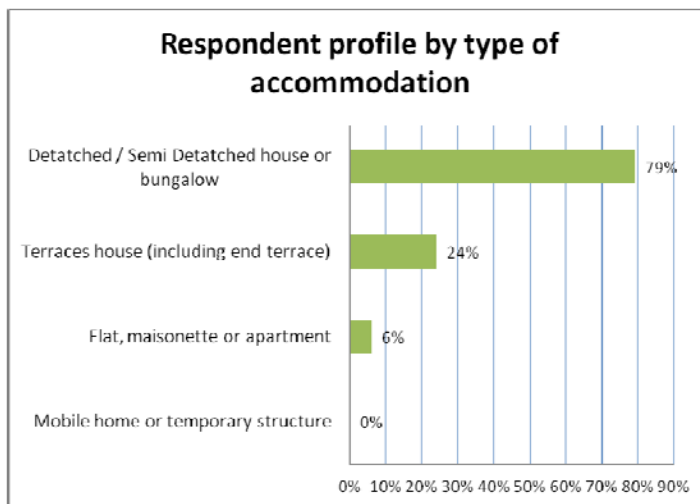
## Disability

Q25. Do you or anyone in your household have a long standing health problem or disability (including problems related to old age) which means you/they have substantial difficulties doing day to day activities or the work you/they can do?



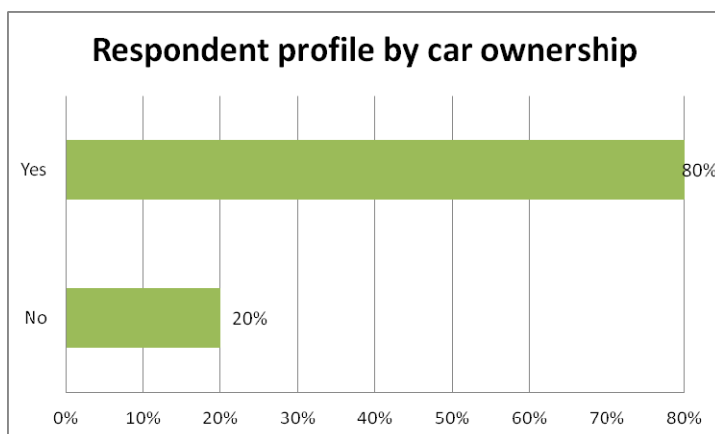
## Type of accommodation

Q26. Which of the following best describes your accommodation?



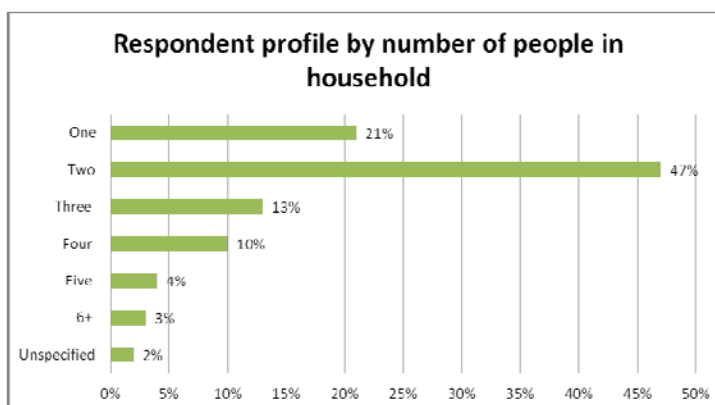
## Car ownership

Q27. Are there any cars or vans that are owned, or available for use, by you at this household?

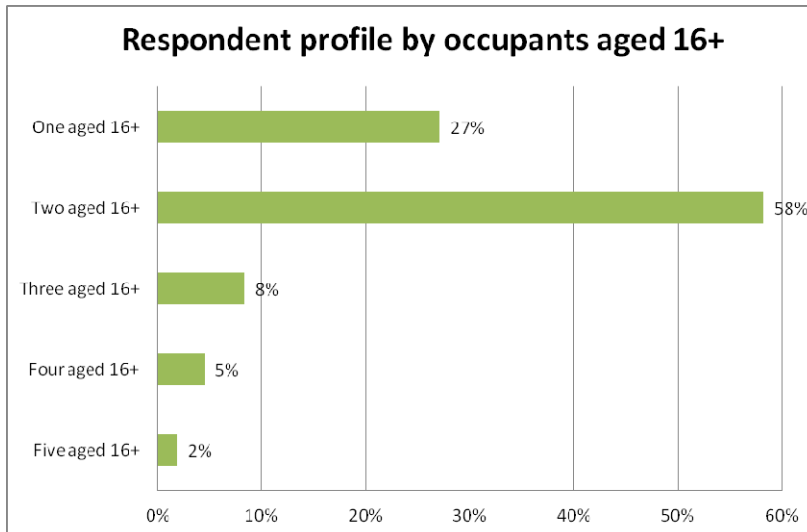


## Household size and composition

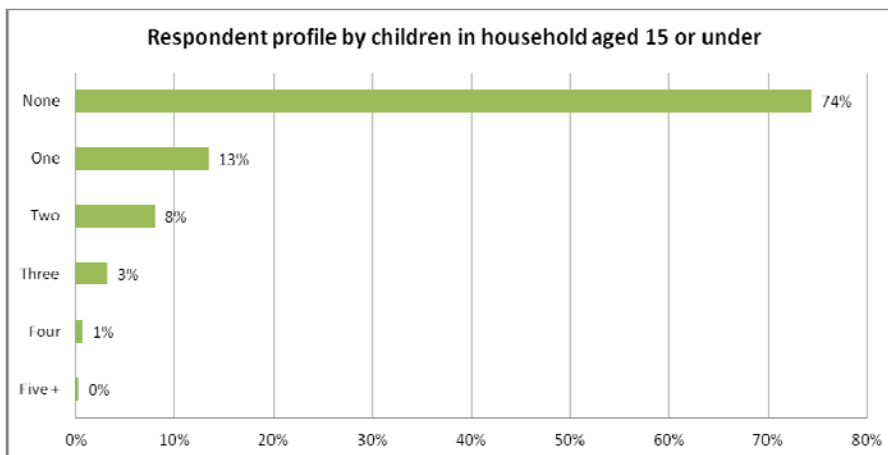
Q 28 – Q30 Including yourself how many people live in total in your household?



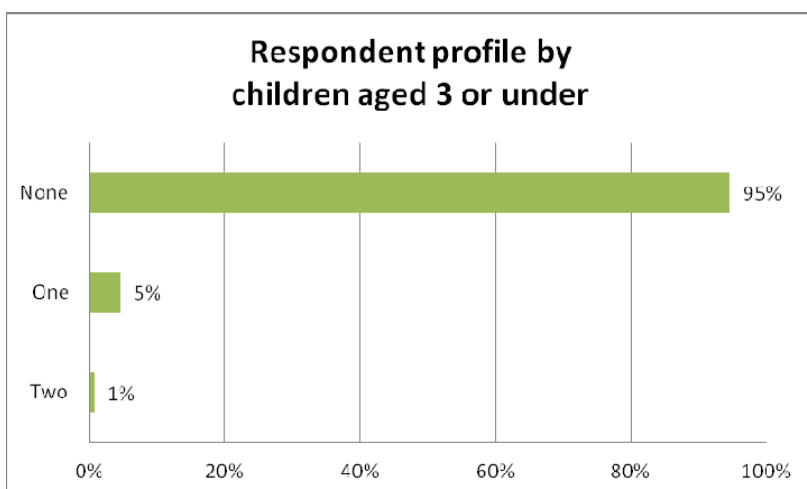
Q28 Including yourself, how many people aged 16 or over live with you at this address?



Q29 And how many children aged 15 or under live with you at this address?



Q30 How many of these children are aged under 3?



## Technical report

### Sample frame and design

The Clean and Green team's Mayrise database of residential waste collection addresses was used as the sampling frame. Matched against the Local Land and Property Gazetteer (LLPG), this was chosen as it comprises the most up-to-date source of addresses available (an especially important consideration given the need to cover all households in receipt of a residential waste collection service).

A sample of 10,000 addresses was drawn. First all business / commercial and communal addresses were removed from the sampling frame. All households with a larger 240 litre bin and/or those receiving assisted collections were automatically included in the sample (4,419) on the basis that they may be more adversely affected by changes to the service. The remaining sample of 5,581 was drawn at random from all remaining addresses in the database. Based on responses to similar surveys previously undertaken and local experience, an overall unadjusted response rate of around 18% was assumed.

3,043 responses were completed in total (with adults aged 16+). The response rate achieved from the sample was 31% (taking into account incorrect or nonexistent/inaccessible addresses and other invalid addresses in the sample).

### Survey approach

The research took place through a postal survey of residents in the borough who receive a residential waste collection service using standard grey, green and where applicable brown wheeled bins. A 6-page questionnaire and covering letter were sent out to each address in the sample on 6 August 2015. No reminders were sent. Fieldwork closed on 30 September 2015, with late responses accepted until 1 October.

### Weighting

Pro-Tel Fieldwork Ltd weighted the data back to the known population profile of Walsall to counter-act non-response bias. Data are weighted by age within gender bands, ethnicity, household size as well as the proportion of households with larger bins and assisted collections. The weighting profile was based on the 2011 Census for age within gender, ethnicity, household size and data held by the Clean and Green service.

### Data analysis, editing and coding

All completed postal questionnaires were processed through manual data entry by Pro-Tel Fieldwork Ltd, entered directly into Snap Survey software. A 30% check back of questionnaires was completed through re-entry.

All open ended questions were coded according to an agreed code frame.

### Statistical reliability

The survey was designed to be representative at borough level and therefore analysis at this level is accurate to within 1.7%.

The respondents to the questionnaire are only samples of the total “population”, so we cannot be certain that the figures obtained are exactly those we would have if everybody had been surveyed and responded. But we can predict the variation between the sample results and the “true” values from knowledge of the size of the samples on which the results are based and the number of times that particular answer is given. The confidence with which we can make this prediction is usually 95% - that is, the chances are 95 in 100 that the “true” value will fall within a specified range.

The table below illustrates the predicted ranges for different sample sizes and percentage results at the “95% confidence interval”. An indication of approximate sampling tolerances is given in the table below. Strictly speaking, the tolerances shown here apply only to random samples, so the comparison with postal research is indicative.

<b>Size of sample on which survey result is based</b>	<b>10%/90%</b>	<b>30%/70%</b>	<b>50%/50%</b>
	±	±	±
3,043	1.0%	1.6%	1.7%
2,000	1.3%	2.0%	2.2%
1,000	1.9%	2.8%	3.1%
500	2.6%	4.0%	4.4%

*Population (number of residential household collections) 102,053*

For example, with a sample of 3,043 where 30% give a particular answer, the chances that the “true” value (which would have been obtained if the whole population had been surveyed) will fall within the range of plus or minus 1.6 percentage points from the sample result, which is very accurate.

It is important to note that the above calculations relate only to samples that have been selected using strict random probability sampling methods. However, in practice it is reasonable to assume that these calculations provide a good indication of the confidence intervals relating to this survey and the sampling approach used.

Sub-level analysis, particularly where bases (the number of people answering the question) are low should be treated with caution when interpreting the results. Percentages based on a small number of people can be misleading. Results are available at Ward level but are of insufficient size to warrant any detailed analysis, but may be used to inform the roll out of the new collection service.

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Appendix A



# TEEP Analysis

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For Walsall Council

**Andy Grant**

**Peter Jones**

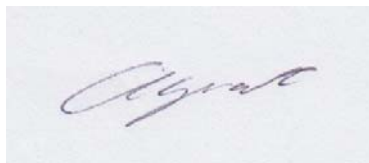
**Wayne Lewis**

**2<sup>nd</sup> December 2015**

## Report for Heather Growcott, Walsall Council

Prepared by Peter Jones and Wayne Lewis

Approved by



.....  
Andy Grant  
(Project Director)

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### *Acknowledgements*

Our thanks to Heather Growcott and Walsall Council for the data provided for this report, and for their feedback and engagement throughout the modelling process.

### *Disclaimer*

Eunomia Research & Consulting has taken due care in the preparation of this report to ensure that all facts and analysis presented are as accurate as possible within the scope of the project. However no guarantee is provided in respect of the information presented, and Eunomia Research & Consulting is not responsible for decisions or actions taken on the basis of the content of this report.



## 1.0 Background

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As part of a collection options appraisal completed in May 2015, Eunomia provided Walsall Council with an analysis of whether its co-mingled recycling collection system was compliant with the Waste England and Wales Regulations 2011 (as amended) ('the Regulations'), and in particular whether separate collection of one or more recyclable materials is necessary or practicable in the terms set out in the law.<sup>1,2</sup>

The council has undertaken a procurement process to replace its MRF contract that was due to expire. In line with the process set out in the Waste Regulations Route Map<sup>3</sup>, prepared by Eunomia on behalf of WRAP, the London Waste and Recycling Board, and Waste Network to assist authorities in interpreting the law, the council has asked Eunomia to advise on whether the new contract alters the assessment of whether separate collection of dry recycling is necessary and practicable in the terms set out in the law.

### 1.1 Regulatory Background

Regulation 13 states that from 1<sup>st</sup> January 2015, all waste collectors in England and Wales are required to collect glass, metal, paper, and plastic ('the four materials') in separate streams where doing so is both necessary and technically, economically and environmentally practicable (TEEP).

Effectively, "necessity" and "practicability" constitute two tests that, if met, mean separate collection is required. However, there is no statutory guidance on how to determine whether separate collection is "necessary" or "practicable".

The current system in Walsall features fully co-mingled collections of the four materials (glass, metal, paper and plastic) and does not therefore directly comply with the Waste Regulations' default requirement that the council collects the four materials separately from all other materials from January 2015. A detailed compliance review was therefore deemed to be needed.

## 2.0 Previous Assessment

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The conclusions reached in our previous assessment of the Council's position were as follows:

### 2.1 Necessity Test Conclusions

On the basis of the modelling undertaken and the information provided by the council, Eunomia reached the following conclusions:

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<sup>1</sup> UK Government (2011) *The Waste (England and Wales) Regulations 2011*, 28<sup>th</sup> March 2011

<sup>2</sup> UK Government (2014) *The Waste (England and Wales) (Amendment) Regulations 2012*, 1<sup>st</sup> October 2012

<sup>3</sup> WRAP, and LWARB (2014) *Waste Regulations Route-map*, April 2014

- it appears that a weekly separate collection system would be expected to increase the amount of recycling collected compared with the baseline. However, there are co-mingled collection options which, if implemented, would be expected to deliver the same level of recycling. Provided that an improved co-mingled collection system is implemented, separate collection is not “necessary” (in the technical language of the Regulations) to facilitate recovery of the four materials;
- it appears that, on certain definitions of “high quality”, separate collection is not necessary in order to improve recovery of materials. However, based on current information regarding output quality, the council’s MRF outputs may not meet more testing definitions of this term; but
- output contamination data and end destinations relating to any new MRF the council may contract with will need to be reviewed when available to check whether certain materials will meet the stronger interpretations of ‘high quality’ that the available guidance suggests.

In summary, Eunomia concluded that there was a clear indication that separate collection was not (in the terms set out in the Regulations) necessary in order to *facilitate* recovery. There was also an argument that it was not necessary to *improve* recovery.

## 2.2 Practicability Test Conclusions

Whilst it was concluded that separate collections were not necessary given the council’s position, Eunomia reviewed whether separate collections would be practicable, in order to ensure that the council had a complete picture of its position in relation to the legislation.

The work conducted strongly indicated that separate collection of the four materials in Walsall was:

- technically practicable, although it would present some challenges; and
- environmentally practicable, since it would result in net carbon saving, which would be greater than that achievable through co-mingled or two stream collections.

However, it appeared that separate collection of all four streams of material would not be economically practicable given the level of savings that the council is required to deliver.

Eunomia advised that even where full source separation is not practicable, councils should consider whether separation of one or more materials might be. The work previously conducted indicated that two-stream collections, with fibres kept separate from containers, would be:

- technically practicable, since it is a widely implemented system;
- economically practicable, since the two stream options would lead to greater financial savings than the co-mingled collection options; and
- environmentally practicable, since one of the two stream options would lead to the second highest carbon savings amongst those considered.

## 2.3 Overall Conclusions

The council accepted these arguments, and concluded that the Regulations did not require separate collections in the council’s case because they were not necessary in order to

facilitate or improve recovery. However, the council noted that this position might change were it to change its MRF arrangements, or were new information to indicate that the outputs from the MRF were not high quality.

The council further noted that separate collections were not economically practicable, but that two stream collections were practicable over all. Were it to decide that separate collections were necessary in the future, the council might then be obligated to introduce the separate collection of paper/card through two stream collections.

## 3.0 Scope of Report

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Since the council assessed its compliance with the Regulations very recently, it is reasonable to assume that, for the most part, the findings of the previous assessment remain valid. It is therefore only necessary to review the previous findings to the extent that the new MRF arrangements might result in different conclusions being reached regarding the council's compliance with the Regulations. There are two principal ways in which this might happen:

- the performance of the MRF might give rise to concerns regarding whether:
  - due to the MRF's processes, less of the material collected will be recycled (e.g. due to less effective separation); and/or
  - the separated material it produces may not be regarded as high quality.

Were the council to conclude that some level of separation is necessary, it would then need to consider whether a collection system that separates certain materials might be practicable; and

- the MRF gate fee might be higher than was previously modelled, resulting in separate collection becoming economically practicable. This would only lead to a change in the outcome of the compliance assessment if it were also to be determined that separate collection of one or more materials is necessary.

It is highly unlikely that a new MRF would result in any significant change in the tonnage of material collected by the council. This report is therefore focused on whether either of these two considerations applies, based on the information supplied regarding the MRF that the council proposes to use in future.

## 4.0 Impacts on Necessity Test

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Separate collection is considered necessary when it would "facilitate" or "improve" recovery. The law provides no definition of "facilitate" or "improve", whether in the Waste Framework Directive, the Regulations or any guidance document. However, the Waste Regulations Route Map advises that:

- "facilitate" means to make possible or easier. If a measure "facilitates" recovery, it might be expected to result in the amount of material recovered rather than sent for disposal being increased.
- recovery is "improved" if it achieves better results. Recovery may therefore be "improved" if:

- more waste is recycled rather than subject to other recovery; and/or
- more of the recycling is of “high quality”.

This section of the report considers whether the council’s proposed new MRF arrangements might lead to different conclusions regarding whether separate collection would facilitate or improve recovery.

## 4.1 Quantity of Material

If a separate collection system *facilitates* recovery, the *quantity* of material expected to be recycled should increase when it is implemented. There is little evidence based on the experience of other authorities to believe that separate collection would deliver a greater quantity of the four materials collected co-mingled at the kerbside, provided that a high-performing approach to co-mingled collection options is implemented.

Since the council proposes to continue to use the same MRF as it did when the previous compliance assessment was carried out, and the MRF is not proposing to make substantive changes to its sorting processes, input specifications or end destinations, there is no reason to believe that the quantity of material recycled will reduce as a result of the council entering into a new contract with the facility.

We therefore find that there is no reason to believe that the new MRF arrangements might alter the conclusions of the previous assessment, that separate collection is not necessary to *facilitate* recovery.

## 4.2 Quality of Material

As part of the council’s tender process for its new MRF, it has received additional information regarding the purity of the materials produced by the MRF. The MRF operator indicates that it is using the sampling process prescribed in the MRF Code of Practice to identify areas of its processes where it can make improvements.

The MRF reported that it had implemented a sampling regime more stringent than the minimum required under the law. It provided the council with its output sample results for Mixed Papers, OCC, Glass, Rigid Plastic and Metal Packaging from the period July-September 2015, which it had also submitted to the Environment Agency.

The results of the MRF’s sampling are shown in Table 1, alongside two possible quality criterion that we suggest may be appropriate to assess whether MRF outputs can be considered to be “high quality”.

**Table 1: Typical MRF Output Contamination Rates**

Material	Casepak	Quality Criterion: Separate Collection <sup>4</sup>	Quality Criterion: Reprocessor Specification <sup>5</sup>
Mixed Papers	1.7%	0.9%	3.0%
OCC Card	4.1%	4.1%	3.0%
Glass	9.0%	0.4%	1.0%
Mixed Rigid Plastic	5.1%	2.9%	6.0%
Aluminium	(Metals) 4.0%	1.0%	3.0%
Steel	(Metals) 4.0%	3.0%	N/a

The typical material outputs can be seen to meet the Resource Association reprocessor specifications for mixed plastics and mixed papers, and to approach very close to it for metals. In addition, it equals the expected purity of cardboard collected by means of separate collection, while coming within one percentage point of the expected performance of separate collection on mixed paper.

The MRF has also supplied details of the offtakers of its materials, which clearly indicates that its offtakers are engaged in closed loop recycling, including the great majority of its glass. The offtaker details are included in Table 2.

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<sup>4</sup>Zero Waste Scotland (2014) *Contamination in Source-separated Municipal and Business Recyclate in the UK 2013*, March 2014, <http://www.zerowastescotland.org.uk/sites/files/zws/Contamination%20in%20source-separated%20municipal%20and%20business%20recyclate%20in%20the%20UK%202013%20240314.pdf>

<sup>5</sup>Resource Association *Recycling Quality Specifications*, accessed 5 August 2014, <http://www.resourceassociation.com/recycling-quality-specifications/>

**Table 2: End Destinations**

Material	Reprocessor	Closed Loop?
Glass	Viridor Recresco	Yes - Remelt
Paper	MLM ACN Europe (UK) Ltd VG Recycling Group Visy Recycling Limited	Yes
Metals	Novelis Recycling Atlas Commodities T Watts Waste Limited.	Yes
Plastics (including Mixed Plastics, PET and HDPE)	Choice Packaging Solutions Limited Greenway Polymers Ltd Redland International Recycling	Yes

The information supplied by the MRF therefore indicates that

- the performance being reported by the council's proposed MRF contractor will be no worse than, and for some materials better than, the output purity performance that was being achieved under its previous contract;
- the quality standard for all materials except for glass is meets or approaches either the published quality requirements of reproprocessors, or the expected quality of separately collected material
- a very large proportion of the council's material appears to going to closed loop uses, as it would were it to be separately collected.

The council is therefore not only able to rely on a relatively weak definition of "high quality" (e.g. that it is able to be sold for recycling); it can also point to the fact that the great majority of its outputs go to closed loop recycling. Finally, it can highlight the fact that, for many materials, its outputs either (a) meet the published requirements of reproprocessors or (2) are of the same or similar purity to the outputs of separately collected material.

Our analysis therefore indicates that the information available regarding the councils proposed MRF contract in no way weakens the argument that separate collection is not necessary in order to *improve* recovery; and in respect of several materials, the argument is strengthened, as the materials will pass a more rigorous quality criterion than originally envisaged.

### 4.3 Extent of Separation

On the basis of the data, it might be argued that, were separate collection to be introduced, this might improve the quality of certain materials, such as glass, plastics and aluminium. In

order to ensure that the council has considered all of the arguments that might arise if this view were to be accepted, an analysis of the implications of the new MRF contract for the practicability test are considered in section 5.0.

However, we note that the MRF's quality performance is particularly strong in respect of paper, with the quality achieved meeting reprocessors' requirements and approaching the level of purity achieved through kerbside sort collections. This finding means that it would be very difficult to argue that two stream collections, with paper and card collected separately from other materials, might improve the quality of paper; we therefore conclude that two stream fibres/containers collections are highly unlikely to improve the recovery of paper, are therefore not necessary.

## 5.0 Impacts on the Practicability Test

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Even where the separate collection of material is necessary in order to facilitate or improve recovery, it is only required under the law where it is deemed to be practicable. The Practicability (TEEP) Test examines whether separate collection would be technically, environmentally and economically practicable. It must be practicable in all three respects in order for it to be required. However, for something not to be practicable is a 'high hurdle'.<sup>6</sup> It is not the same as it being difficult or inconvenient.<sup>7</sup>

### 5.1 Technical Practicability

The previous review concluded that, whilst separate collections would certainly pose challenges in the specific context of Walsall, it was difficult to conclude that these would be so grave as to make such a service not technically practicable. The council's changed MRF arrangements do not alter this assessment.

### 5.2 Economic Practicability

Whilst the new MRF gate fee is more expensive than the council's former arrangements, it was always anticipated that this would be the case. Eunomia's options modelling assumed a MRF gate fee of around £35 per tonne (inclusive of haulage), looking at three different price scenarios.

In practice, the council has been able to secure a lower gate fee, which somewhat improves the financial performance of a co-mingled collection system in comparison with the alternatives.

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<sup>6</sup> Defra, Letter to Local Authority Bodies on the Separate Collection of Waste Paper, Metal, Glass and Plastic, October 2013, p2.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/250013/waste-seperate-collection-201310.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/250013/waste-seperate-collection-201310.pdf)

<sup>7</sup> Compare UK Recyclate Ltd and Others v Secretary of State for Environment, Food and Rural Affairs and Welsh Ministers, Royal Court of Justice, Case No. CO/6117/2011, paragraph 18

Separate collection was previously found to be considerably more expensive for the council than co-mingled collection. Since the actual MRF gate fee achieved is lower than that modelled, it reinforces the finding of the previous review, that separate collection is not economically practicable.

The improved gate fee would also reduce the economic advantage that two stream collections were found to have over co-mingled collection in the previous modelling.

### 5.3 Environmental Practicability

The results of the previous assessment found that separate collection is environmentally practicable, and outperforms co-mingled collection due to greater benefit being derived from the material collected and lower infrastructure and processing costs. Whilst the outcome of the MRF tender would be likely to reduce this advantage to some extent, it would be unlikely to result in separate collection proving not to be environmentally practicable.

### 5.4 Practicability Test Conclusions

The outcome of the council's MRF tender does not alter the conclusions of the previous study, which indicated that separate collection of the four materials in Walsall is:

- technically practicable, although it presents some challenges; and
- environmentally practicable, since it would result in net carbon saving, which would be greater than that achievable through co-mingled or two stream collections.

The gate fee achieved indicates that separate collection would not be economically practicable within the available budget.

Nor is there any reason to alter the previous conclusion regarding two-stream collection, namely that this would be:

- technically practicable, since it is a widely implemented system;
- economically practicable, since the two stream options may lead to greater financial savings than the co-mingled collection options; and
- environmentally practicable, since it would result in a net carbon saving, and would perform better than co-mingled collection.

## 6.0 Conclusions

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The council's MRF tender has delivered a lower than anticipated gate fee and an improvement in output quality compared with the assumptions used in the previous compliance assessment. As a result, the findings of the previous study are confirmed and strengthened. Expressed in simple terms:

- Because of the quantity and quality of the outputs from the council's MRF, there is a clear argument that separate collections are not necessary in order to facilitate or improve recovery. It appears that the great majority of materials from the MRF are sent for closed loop recycling.



- Separate collection through kerbside sort is not economically practicable.
- Two stream collection may well be practicable, but given the high quality of the paper produced by the MRF, the separation of paper from other materials is not necessary in order to facilitate or improve recovery.

These conclusions apply equally to the weekly or fortnightly collection of refuse. The council therefore has a strong argument that until such time as there is another significant change to relevant contracts, contract assets or a collection method, there is no requirement to amend its services in order to achieve compliance with the Regulations.

# Revised Household Waste Collection Policies

Additional capacity to the standard service based on the number of people in permanent residence at the property

House hold size	Residual Waste (Grey Bin)	Recycling (Green Bin)	Garden Waste (Brown Bin)
1 – 2	140L Grey bin No additional capacity	240L Green bin No additional capacity	240L Brown bin No additional capacity
3	140L Grey bin Potential to increase to 240L grey bin.  Residents may apply for the larger bin and provide evidence of the number of people residing at the property.  The Council will determine whether or not it is necessary to issue a larger bin.  Waste audits will be carried out. Larger bins will only be issued if resident is recycling correctly, attempting to minimise their waste and are genuinely unable to cope with a 140L bin.	240L Green bin No additional capacity	240L Brown bin No additional capacity
4 or 5	240L Grey bin Residents may apply for the larger bin and provide evidence of the number of people residing at the property.  Households that do not apply will continue to receive collections in a 140L bin.	240L Green bin No additional capacity	240L Brown bin No additional capacity
6 or more	240L Grey bin  Residents may apply for a larger bin and provide evidence of the number of people residing at the property.  Households that do not apply will continue to receive collections in a 140L bin.	240L Green bin Additional recycling capacity will be provided as the first option.  Residents may apply for a larger 360L bin and provide evidence of the number of people residing at the property.  Households that do not apply will continue to receive collections in a 240L bin.	240L Brown bin No additional capacity
	In exceptional circumstances a 360L grey bin for residual waste may be issued for very large families. This will be assessed on a case by case basis and the Council will determine whether or not it is necessary to issue a larger bin. Waste audits will be carried out and if a resident is recycling correctly, attempting to minimise their waste and are still genuinely unable to cope with a 240L bin, the larger bin may be issued.		

### Summary of Options Appraisal

The current service was introduced in 2009 and comprises of the following collections:

<b>Waste type</b>	<b>Bin size</b>	<b>Collection frequency</b>
<b>Rubbish</b>	140 litres	Weekly
<b>Garden waste</b>	240 litres	Alternate weekly
<b>Recycling</b>	240 litres	Alternate weekly

Originally there were five potential options for consideration. Following discussions with the Portfolio Holder these were narrowed down to two which were taken forward for public consultation.

#### **Collection Option 1 – Bin Swap - Swapping garden waste and residual waste bins**

The brown 240l garden waste bin is used to collect general rubbish and the grey 140l bin is used to collect garden waste. The green 240l recycling bin remains the same.

<b>Waste type</b>	<b>Bin Size</b>	<b>Collection Frequency</b>
<b>Rubbish</b>	240 litres	Alternate weekly
<b>Garden Waste</b>	140 litres	No change
<b>Recycling</b>	No change	No change

#### **Comments**

##### **Pros**

- £736k savings (including impact of disposal diversion)
- Service user satisfaction with refuse and recycling likely to be ok
- Relatively easy implementation
- No specialist vehicles required.

##### **Cons**

- Lower recycling rate than other options
- Service user dissatisfaction on garden waste (too small for some)
- Management of increase contamination of dry recycling

## **Risks**

- Small garden bin is not common
- Increased use of HWRC sites

## **Collection Option 2 – No bin change - All bins emptied every other week**

<b>Waste type</b>	<b>Bin size</b>	<b>Collection frequency</b>
<b>Rubbish</b>	No change	Alternate weekly
<b>Garden waste</b>	No change	No change
<b>Recycling</b>	No change	No change

## **Comments**

### **Pros**

- £921k savings (including impact of disposal diversion)
- Higher recycling rate than option 1
- No specialist or new vehicles required

### **Cons**

- Service user dissatisfaction with residual volumes
- Management of increased contamination of dry recycling
- Longer lead in time on service delivery change

### **Risks**

- Walsall has relatively high amounts of residual waste. With no food waste collection there is an implementation risk that the bins are too small. Can be mitigated with larger capacity bins where necessary

## **Financial Impacts**

- Options 1 and 2 will deliver a reduction in service costs.
- All the options modelled are price sensitive.
- The options appraisal, used processes current at the time of modelling exercise (April 2015).
- The impact of the disposal diversion is the adjustment of tonnages from residual waste to recycling and vice versa but does not take into account of changes on rates due to the procurement of the new disposal contracts.

## **Risk**

The recycling commodity market is very volatile and the prices achieved in the new disposal contracts may be very different to the prices used in the modelling (April 2012).

The value of recyclable materials has dropped considerably since the current disposal contracts were procured in 2011. The prices the Council has benefitted from during the term of the current contract are no longer achievable. Materials prices are subject to market forces and are beyond the control of the Council.

## Appendix E

### Equality Impact Assessment (EqIA) for Policies, Procedures and Services

Proposal name	Alternate Weekly Collection of Domestic Residual Waste		
Directorate	Economy & Environment		
Service	Clean and Green		
Responsible Officer	Mark Holden		
EqIA Author	Mark Holden / Jo Cockbill		
Date proposal started	03-09-14	Proposal commencement date (due or actual)	02-10-15

1	<b>What is the purpose of the proposal?</b>	<b>Yes / No</b>	<b>New / revision</b>
	Policy	Yes	Revision
	Procedure		
	Internal service		
	External Service	Yes	Revision
	<p>Changing domestic residual waste collections from once per week to alternate weekly collections to deliver savings of circa £921k per annum while continuing to provide a refuse collection service that fulfils the Council's statutory duties, meets the needs of residents and remains within the budget available. Key drivers for service change are the need to deliver financial savings, reduce waste arisings and increase the amount of waste recycled.</p>		
2	<b>What are the intended outcomes, reasons for change? (The business case)</b>		
	<p>The Council is required to reduce costs by £84.8million over the next 4 years. For 2016/17 there is a shortfall of approximately £25m and for 2017/18 a shortfall of £28 million in Council budgets.</p> <p>Changing the domestic residual waste collection service from once per week to alternate weekly collections has been identified as generating savings of circa £921k per annum by;</p> <ul style="list-style-type: none"> <li>Reducing waste collection costs – less vehicles and crews will be required.</li> <li>Reducing disposal costs – less residual waste will be sent for disposal.</li> <li>Encouraging recycling.</li> </ul> <p>Alternate weekly collections will continue to provide a refuse collection service that fulfils the Council's statutory duties and meets the needs of residents within the budget available.</p> <p>In addition to achieving budget savings the proposal also helps the Council to meet the</p>		



Wales) Regulations 2011 the purpose of which is to minimise the amount of waste produced, to reduce the residual waste sent for disposal and to encourage correct recycling.

### **Environmental**

The change to alternate weekly collections is likely to have a positive impact on the Councils recycling rates by encouraging residents to make proper use of the recycling bin.

The reduction of collections will produce less vehicle movements and reduce carbon emissions

There is the potential for fly tipping to increase.

### **Other facilities**

Residents have the choice to dispose of additional waste via other arrangements e.g. skip hire or use of HWRC

### **Engagement and Consultation**

Public consultation on the two options identified was carried out between 6 August and 30 September 2015. Questionnaires were sent to a random sample of 10,000 properties from which a healthy response rate of 31% was achieved, representing 3,043 valid responses; and meaning that the data is robust and statistically accurate at the borough level to within a small margin of error (1.7%).

In addition to the random postal survey, anyone could have their say via an open online survey and paper questionnaires made available at various public events and venues throughout the borough. The survey was also sent to members of the People's Panel, a 500 strong online panel. In total 853 responses were received through these additional consultation channels.

After taking everything into account, when asked which option for alternate weekly collections residents preferred, approximately half (50%) preferred Option 2 and just over a third (35%) preferred Option 1. The remaining 15% preferred another option, with most wanting to keep a weekly collection. It is therefore considered that more residents prefer Option 2, with some groups having reservations about coping with reduced capacity of the residual waste bin.

Of the residents who felt Option 2 did not meet their needs; (43%), most of these people said it was because the 140 litre grey household waste bin is likely to be full to capacity before the next collection date. Amongst those groups of households where this was a key concern were families of 3 and those of 6 plus.



5	How may the proposal affect each protected characteristic or group? The affect may be positive, negative or neutral.			
	Characteristic	Affect	Reason	Action needed Y or N
	Age	Neutral	<p>It is considered this proposal does not affect people based on their age alone but is linked to the number of people residing in a property, residents with mobility problems or if the household generates more waste due to medical reasons.</p> <p>Elderly residents may be affected if they produce large amounts of waste related to medical conditions and the capacity of the waste they can dispose of is reduced. The policies associated with the service have been revised and additional capacity will be made available to these residents in a similar way to the current service.</p> <p>Elderly residents may have difficulty in moving bins due to mobility constraints. An assisted collection service is currently available to anyone with a mobility problem and where no-one in the household is able to take the bins to the normal collection point. The collection team will collect the waste or recycling from an agreed location, empty the bin and return it back to the agreed location. This service will remain as part of the alternate weekly collection service.</p>	N
	Disability	Neutral	<p>Disabled residents may be affected if they produce large amounts of waste related to medical conditions and the capacity of the waste they can dispose of is reduced. The policies associated with the service have been revised and additional capacity will be made available to these residents in a similar way to the current service.</p> <p>Disabled residents may have difficulty in moving bins due to mobility constraints. An assisted collection service is currently available to anyone with a mobility</p>	N

		<p>problem and where no-one in the household is able to take the bins to the normal collection point. The collection team will collect the waste or recycling from an agreed location, empty the bin and return it back to the agreed location. This service will remain as part of the alternate weekly collection service.</p> <p>Residents with a visual impairment may have difficulty understanding written communications or information literature and be unable to understand the full range of services available to them. This will be addressed via the Communications Plan.</p>	
Gender reassignment	Neutral	Although the service is changing, no adverse impact has been identified on this group	N
Marriage and civil partnership	Neutral	Although the service is changing, no adverse impact has been identified on this group	N
Pregnancy and maternity	Neutral	<p>Public consultation identified key concerns about the proposed collection service from families of 3 people and those of 6 plus people. Respondents said it was because the 140 litre grey household waste bin is likely to be full to capacity before the next collection date.</p> <p>A policy currently exists for the provision of increased capacity for larger households e.g. Asian extended families. This policy has been reviewed as part of this proposed change and additional capacity will be made available families of 3 people and those of 6 plus people in a similar way to the current service but will be subject to a waste audit and education visit.</p>	N
Race	Neutral	A policy currently exists for the provision of increased capacity for larger households e.g. Asian extended families. This policy has been reviewed as part of this proposed change and additional capacity will be made available families of 3 people and those of 6 plus people in a similar way to the current service but will be subject to a waste audit and education visit.	Y

			If English is a second language residents may have difficulty understanding communications or information literature and be unable to understand the full range of services available to them. Translation services are available and have been used previously. In addition, material will be written in plain English. Written translation material will be available to residents if required.	
	Religion or belief	Neutral	Although the service is changing, no adverse impact has been identified on this group	N
	Sex	Neutral	Although the service is changing, no adverse impact has been identified on this group	N
	Sexual orientation	Neutral	Although the service is changing, no adverse impact has been identified on this group	N
	Other (give detail)			
	Further information			
6	<b>Does your proposal link with other proposals to have a cumulative affect on particular equality groups? If yes, give details below.</b>			(Delete one) <b>No</b>
	No			
7	<b>Which justifiable action does the evidence, engagement and consultation suggest you take? (Bold which one applies)</b>			
	<b>A</b>	<b>No major change required</b>		
	B	Adjustments needed to remove barriers or to better promote equality		
	C	Continue despite possible adverse impact		
	D	Stop and rethink your proposal		

**Now complete the action and monitoring plan on the next page**

Action and monitoring plan				
Action Date	Action	Responsibility	Outcome Date	Outcome
16-12-14	Final Draft EQIA complete	Mark Holden / Jo Cockbill		
21-12-14	Update Required After Closure of Consultation	Mark Holden / Jo Cockbill		
Dec 14	Include EQIA Review in Options Appraisal / Feasibility Study	Mark Holden / Jo Cockbill / Heather Growcott		
Aug – Sept 2015	Carry out public consultation on options identified in options appraisal	Mark Holden / Jo Cockbill / Julie Birch	October 2015	Public consultation identified Option 2 – No bin change - All bins emptied every other week as the preferred option
Autumn 2015	Review and revise arrangements for collecting from large households and households with medical waste	Mark Holden / Jo Cockbill / Heather Growcott	November 2015	Revised policy document produced

Update to EqIA	
Date	Detail
16-12-14	EQIA updated based on consultation snap shot data
01/06/2015	Consultation and equalities update
22/07/2015	Consultation and equalities update

24/08/2015	Consultation and equalities update
Nov 15	EqlA updated following outcomes of public consultation and concerns identified.