

APPENDIX 1

GLOUCESTER CITY COUNCIL

COMPLIANCE WITH THE WASTE (ENGLAND & WALES) REGULATIONS 2011, AS AMENDED IN 2012

OVERVIEW OF WASTE MANAGEMENT

Between 1st April 2014 and 31st March 2015 Gloucester City Council collected 28,767 tonnes of waste from household sources (as reported through Waste Data Flow). The total waste stream for the year was 35,789 tonnes, which included all material collected for recycling, fly-tipping, clinical waste, bulky item collections and waste derived from street cleaning. Of this total 6718 tonnes of dry recyclable material was collected, 2300 tonnes of food waste and 6016 tonnes of garden waste. In addition Gloucester City Council operates 5 bring sites which collect approximately 300 tonnes of cardboard each year and 38 tonnes of mixed plastics.

From 1st January 2015 the Waste (England & Wales) regulations 2011 (and as amended in 2012) require the collection of plastic, glass, metals and paper to be collected separately from general waste and each other, subject to this being:

Necessary to ensure the recovery of high quality recyclables

And

Technically, Environmentally and Economically Practicable to do so

The purpose of waste regulation 11 and waste regulation 12 (WR11& WR12) is to ensure high quality material, and although DEFRA have not issued definitive guidance, WRAP have produced a Route Map to help authorities ensure they are compliant. Gloucester City Council currently operates a kerb side sort service, using Terberg Kerbsider vehicles. This allows material to be sorted at the point of collection, and any contamination is left in the kerb side box and labelled. This method of collection ensures very low and sometimes zero contamination rates in the recycling stream.

The Environment Agency wrote to all local authorities in December 2014 to inform them of the requirements of WR11 and WR12. Gloucester City also completed a questionnaire for the EA on our collection methods in March 2015. A statement from the EA this year said “Our aim is to help collectors to achieve compliance, but to be robust with those who deliberately ignore their obligations. We will work with collectors to help them to comply, by holding practical conversations or issuing advisory letters in the first instance. Further action will be taken only where necessary.

The below table has also been published by the EA and “describes examples of indicators of different levels of compliance”. Taking all this advice into consideration it is reasonable to assume that our current service will be compliant with WR11/WR12. All materials are already collected separately and Gloucester City have a high level of compliance, indicating it is not necessary to carry out the **necessity** test.

Table 1 : Table of compliance - supplied by Environment Agency

LEVEL OF COMPLIANCE	INDICATOR	LEVEL OF INTERVENTION
<p style="text-align: center;">HIGH</p>	<ul style="list-style-type: none"> • Collections which are providing an onsite or doorstep separate collection, or kerb side sorting, of each paper, glass, plastic and cans. • Collectors who have rigorously applied the Necessity and TEEP tests and collection arrangements are based on well-evidenced, documented and justified decision making. 	<p style="text-align: center;">LOW</p>
<p style="text-align: center;">MEDIUM (possibility of failing the necessity or TEEP test)</p>	<ul style="list-style-type: none"> • Collectors who send co-mingled collections to a MRF which is producing poor quality recyclates. • A collector advertising a new contract that is prescriptive about type of collection/sorting service unless it is clear it wants a multi-stream / separate collection. • A collection which has moved away from separate collection to co-mingling, or renewed to co-mingling since 2012 • If one or more of the four materials is only collected through a CA site or bring banks. 	<p style="text-align: center;">MEDIUM</p>
<p style="text-align: center;">LOW (NON COMPLIANT)</p>	<ul style="list-style-type: none"> • No or little attempt to apply the regulations. No response to requests for information. • Evidence from site inspections or audits where collections have led to poor management causing environmental harm, or illegal activity such as mis-description or illegal export. 	<p style="text-align: center;">HIGH</p>

Table 2 : Composition of waste materials collected for recycling 2014-2015 (numbers have been rounded)

MATERIAL	WEIGHT (TONNES)	PROPORTION OF OVERALL WASTE COLLECTED
Garden Waste (kerb side)	6017	16.8%
Food Waste (kerb side)	1091	3%
Paper (kerb side)	3075	8.6%
Cardboard (bring site)	304	0.85%
Aluminium & Steel Cans (kerb side)	483	1.3%
Glass (kerb side)	2377	6.6%
Plastic Bottles (kerb side)	678	1.9%
Scrap Metal (Kerb side)	32	0.09%
Large WEEE (CRT's)	16	0.04%
Wood (kerb side)	48	0.13%
Mixed Plastics (bring site)	36	0.10%
Books (3 rd Party bring site)	40	0.11%
Textiles (3 rd Party bring site)	210	0.59%
	TOTAL 14,407	40%

The new Waste Regulations, also places an obligation on waste managers to apply the waste hierarchy to all waste collected. The below table illustrates our commitment to the waste hierarchy. Waste should be first avoided or minimised, then re-used if possible, then recycled where possible, then only as a last resort disposed of.

Table 3 : Assessment of compliance (to substantiate our position) - TEEP test

Commodity	How it is handled?	Is it mixed after collection?	Measures taken for Prevention	Where is it on the waste hierarchy	Closed loop recycling?	Possibility of moving up the waste hierarchy?
Paper	Source segregated kerb side collection, stored separately and sent to DS Smith paper mill for reprocessing into paper products	No	Promote unwanted mail campaigns	Recycling	Yes	No
Mixed Glass	Source segregated kerb side collection, stored in a separate bay and sent to Berrymans for reprocessing into glass bottles and jars	No	Promote reduction	Recycling	Yes	No
Plastic Bottles	Source segregated kerb side collection, stored separately and sent for onward processing to JFC Plastics, made into pipes and ducting	No	Promote reduction	Recycling	Yes	No
Aluminium and Steel Cans and Aerosols	Collected together in separate compartment of vehicle, separated by use of magnet at depot. Sent to Richard Freeth for onward processing and turned into cans again	No	Promote reduction	Recycling	Yes	No

Cardboard	Collected separately at bring sites, stored separately and sent to Smurfit Kappa, makes cardboard again	No	Promote reduction/reuse	Recycling	Yes	No
Composite Cartons	Collected separately at bring sites (also recently introduced to kerb side service as a segregated collection). Baled and stored as separate commodity, sent to ACE UK for processing into paper board, polymers, and aluminium for use as raw material	No	Promote reduction	Recycling	Closed loop and open loop	No
Food Waste	Collected separately at kerb side, stored and transported daily to Andigestion, where it is used for energy generation and used to power 4000 homes, the bi-product is used on local farmland	No	Promote reduction through "Love Food Hate Waste" campaign	Recycling (anaerobic digestion)	N/A	No
Green Waste	Collected in a separate vehicle and taken directly for open windrow composting at Cory Environmental	No	Encourage home composting	Recycling (composting)	N/A	No
Fridges	Collected separately and taken to Cory Environmental where gases are removed elements re-used	No	N/A	Recycling	Partial	No
Mixed Plastics	Collected separately at bring sites, stored and baled separately, and transported in bales to Printwaste, where it is sent for reprocessing into plastic food packaging products	No	Promote reduction	Recycling	Yes	No

Scrap Metal	Collected separately with other bulky items, stored separately and sent to Phelps Brothers, melted down and re-used for metal products	No	Promote re-use	Recycling	partial	No
Large WEEE CRT's	Collected separately as part of bulky waste service and sent to Cory Environmental, where they are stripped and various elements recycled	No	Promote re-use	Recycling	partial	No
Bulky Item Waste	Collected separately, chargeable collection by appointment	No	Promotion of reuse through Furniture Recycling Project, Emmaus or other Charity	Partial Recycling Partial disposal	N/A	No
Residual Waste	Collected fortnightly	No	Waste minimisation campaigns, closed lid policy, promotion of recycling through waste education	Disposal to landfill	N/A	No