



Cabinet

Tuesday, 14 January 2025

Simpler Recycling Update

Report of the Director – Neighbourhoods

Cabinet Portfolio Holder for Environment and Safety, Councillor R Inglis

1. Purpose of report

To update the Cabinet on the requirements of the Environment Act 2021, in relation to household waste collections and in particular the development of a Nottinghamshire wide approach regarding the requirements of the 'Simpler Recycling' regulations, including weekly food waste collections and a new kerbside glass collection service. The report also outlines the next steps towards operational delivery of these potential service changes.

2. Recommendation

It is RECOMMENDED that Cabinet:

- a) endorses the approach set out in paragraph 4.17 to align the Council's household waste collection arrangements with the 'Simpler Recycling' requirements;
- b) supports the continuation of work with the Nottinghamshire Joint Waste Management Board to progress the wider operational planning for 'Simpler Recycling' implementation across the County; and
- c) recommends that the Medium Term Financial Strategy (to be approved by Full Council) incorporates the financial implications (in Appendix A) and in particular the creation of a Simpler Recycling Reserve.

3. Reasons for Recommendation

- 3.1. The collection of household waste is a statutory function of the Council as a defined Waste Collection Authority (WCA) and as such it must comply with any legislative requirements, which specify the arrangements for collections.
- 3.2. The Council must also work in conjunction with Nottinghamshire County Council who are the Waste Disposal Authority (WDA) in relation to any collection arrangements to ensure a system approach is adopted.

- 3.3. A decision on the Council's approach to 'Simpler Recycling' is also required to give sufficient time for the ordering of new vehicles, receptacles and operational planning.

4. Supporting Information

- 4.1. On 21 October 2023, Government announced its plans for the introduction of 'Simpler Recycling', which intends to ensure all homes in England recycle the same materials at the kerbside. This is effectively a rebranding of the former "consistency in collections" proposals contained in the Resources and Waste Strategy (RWS) for England 2018.
- 4.2. The plans propose that by 31 March 2026, local authorities will be required to collect the following recyclable household waste streams from the kerbside: paper and card, plastic bottles, plastic pots, tubs and trays, metal, foil, glass, food waste and garden waste. The new proposals allow consideration that, the dry recyclables can be collected in separate containers or co-mingled in one bin and this was confirmed in new guidance which was issued by DEFRA on 29 November 2024.
- 4.3. By 31 March 2027 the dry recycling specification will be further expanded as WCAs will also need to collect plastic film and plastic bags as part of their kerbside collection service.
- 4.4. For non-household municipal premises (such as hospitals, schools and businesses but excluding micro-firms) this comes a year earlier, as they will be required to recycle the same recyclable waste streams (excluding garden waste) by the 31 March 2025. It will be important that these premises work closely with their chosen trade waste collection provider to ensure compliance readiness.
- 4.5. Micro-firms (businesses and relevant non-domestic premises with fewer than ten full time equivalent employees) will be temporarily exempt from this requirement and will have until 31 March 2027 to arrange for recycling of these core recyclable waste streams.
- 4.6. The collection of additional materials from households at the kerbside, including plastic film, is linked to the broader Extended Producer Responsibility (EPR) Scheme for Packaging, which will see producers of packaging waste having to pay fees linked to the amount of packaging waste produced and therefore requiring collection by WCAs. The scheme is designed to drive a reduction in the production and use of packaging material on the consumer market, as well as encourage producers to use packaging that has a sustainable end market for future re-use or recycling. Further information on EPR payments being made to the Council is covered in the funding section of this report.
- 4.7. The Government has also committed to providing new burdens funding for the introduction of 'Simpler Recycling' requirements to collect food waste from domestic premises. Capital transitional funding has already been

provided to the Council; however, ongoing resource costs are likely to be delayed linked to the transition arrangement detailed in paragraph 4.15 of this report.

- 4.8. A further element of the RWS was the creation of a National Deposit Return Scheme (DRS) which would allow residents to return their waste plastic bottles and cans into a national network for recycling. It is currently understood that the scheme has been delayed until at the earliest 2027, therefore its impact on materials presented for kerbside recycling and on street waste collection cannot be fully assessed at this time and will need to be the subject of a further report if significant implications are identified.

Joint Working and the Nottinghamshire Waste Partnership Options Appraisal for Waste and Recycling

- 4.9. To meet the 'Simpler Recycling' requirements and to ensure that kerbside services across the County are efficient and effective whilst minimising overall system costs for waste collection and disposal for the public, it is essential that a consistent collection methodology is used by all seven WCAs in the County.
- 4.10. Through the Nottinghamshire Joint Waste Management Board a county wide project has been in place since 2022, working with Waste and Resources Action Programme (WRAP) and Resource Futures (a private consultancy firm appointed by WRAP to undertake the project), to model the future of waste collections in Nottinghamshire, including changes to the dry recycling stream and the introduction of a weekly food waste collection service.
- 4.11. The modelling focussed on assessing the impact of service changes for the WCAs, in meeting the requirements of 'Simpler Recycling'. The project considered the operational effects of change, the impact on different household types, the financial implications, the potential carbon savings, suitability of current infrastructure, public acceptance and alignment with government requirements.
- 4.12. A number of collection options were considered for the dry recycling changes including a dual bin recycling service with paper and card in one two-week cycle, and plastics, metals and glass in the other. However, when taking a Notts wide 'waste system' approach the preferred option that emerged was to retain the existing single mixed recycling wheeled bin with an expanded range of materials (i.e. cans, plastic bottles, pots, tubs and trays etc) and to collect glass through a separate kerbside service.
- 4.13. The separation of glass into a single collection stream is important as in addition to being a valuable resource, it is also a major contaminant in the paper and cardboard recycling industry. This collection methodology will also help to ensuring that Rushcliffe and the other Nottinghamshire WCAs have a consistent, reliable income stream from the prospective Extended Producer Responsibility payments which are explained further in paragraph 4.32.

- 4.14. However in accordance with the latest DEFRA guidance this preferred option for dry recycling collection methodology will need to be subjected to a refresh of the existing 'Technically, Environmentally and Economically Practical Assessment (TEEP) that is in place across the county.
- 4.15. In terms of food waste and due in part to the complex and contractual nature of the waste disposal arrangements between the WDA and their waste disposal contractor, a collective decision was taken with the support of JWMB that kerbside food waste collections should be delayed across Nottinghamshire until 1 October 2027. This Transitional Arrangement has since been agreed by DEFRA and will give additional time and opportunity for effective collection and disposal arrangements to be put in place across the county.
- 4.16. A key element for the successful implementation of these significant changes will be an effective communication and education campaign which will be enhanced and facilitated by having the same arrangements across the county. This will allow coordinated and consistent communication and educational products to be prepared with the support of the WDA and their contractor.

Waste Service Implications for Rushcliffe BC

- 4.17. The impact of 'Simpler Recycling' will require the Council to make several changes to its current waste collection service and these are summarised below:
- a) Deliver a separate kerbside glass collection service by 31 March 2026 (current target date is 1 December 2025).
 - b) Publicise the wider range of dry recycling materials that can be placed in the blue recycling bin by 31 March 2026.
 - c) Continue to work with JWMB on the plans for a weekly food waste collection service by 1 October 2027.
 - d) Continue to work with JWMB on a county wide approach for the inclusion of plastic film and plastic bags in the dry recycling collection kerbside collection service by 31 March 2027.
- 4.18. The Council already has the highest recycling rate in the County of nearly 50% each year; however, by implementing these changes, required by 'Simpler Recycling', this should provide a further opportunity for residents to recycle their waste and with high participation rates could increase the Council's recycling rate to nearly 60% in 2028/29 when the weekly food waste scheme is launched.
- 4.19. To understand the service changes in more detail the following paragraphs cover the key elements of 'Simpler Recycling' and the necessary changes for the Council's waste collection service.

Dry Recycling Service (blue wheeled bin)

- 4.20. As stated in paragraph 4.12 the continuation of the kerbside collection of comingled dry recycling on an alternate weekly basis will continue in Rushcliffe subject to the county wide TEEP Assessment refresh. The expansion to include a wider range of materials such as tetra pak, plastic tubs, foil, etc. by 31 March 2026 will not require changes to the collection methodology or the resources required by the Council apart from a potential increase in second blue wheeled bin requests as residents seek to recycle the wider range of packaging materials.
- 4.21. There will be a need to support a county wide recycling communication campaign to help residents understand the changes and to ensure they are maximising the broader recycling opportunities.
- 4.22. Looking ahead, further work is required on a county wide basis to develop the most efficient and effective approach for the inclusion of plastic film and plastic bags in the dry recycling collection kerbside collection service by 31 March 2027. A number of options are being considered; however, in addition to making it 'simple' for residents, the end sorting and processing will also need to be considered as these materials are often difficult to sort in a comingled stream.

Glass Recycling Service

- 4.23. The Council's current and extensive bring site service for glass, collects around 2,500 tonnes each year, which is colour separated throughout the collection and disposal process, which allows the glass to then be remanufactured into new glass bottles and jars.
- 4.24. The new kerbside collection will allow glass to be placed into a 180 litre wheeled bin (existing bins are 240 litres) which will then be collected from the kerbside on a six weekly cycle on the same day as the grey residual wheeled bin. Under this new service the glass presented for recycling will be collected mixed as there have been recent and significant improvements in separation technology, which now allows glass to be colour sorted at the glass reprocessing stage. Importantly, this will help to ensure that the glass collected from this new service will continue to be made into new glass vessels and jars, which has always been an important factor for the Council.
- 4.25. It is intended that the new service will be an 'opt out' arrangement as it expected that the 'simpler' kerbside service should make it even easier for local residents to recycle their glass particularly for those living in rural communities who may not be close to an existing bring site. Further work will be undertaken on the best collection methodology for communal bin stores and flat complexes where different receptacles may be more appropriate.
- 4.26. The service will require two full time collection crews (six people) with two new freighters of appropriate specification and will require approximately 50,000 new 180 litre wheeled bins. To help mitigate the service and budget

pressure it is intended that the new rounds will absorb staff from the existing bring site service, which will also be phased out shortly after the new service is launched. The project roll out plan will identify any needs for consultation with potentially affected staff.

- 4.27. The glass collected from the kerbside will continue to be temporarily stored at the Eastcroft Depot where the Council's recycling2go service is based prior to collection by the glass reprocessing company. Work will also continue with Nottingham City Council who own the Eastcroft depot site to ensure that the space requirements for all the 'Simpler Recycling' changes can continue to be accommodated at the depot site including the weekly food waste service.

Food Waste Collection Service

- 4.28. As stated earlier in the report a Transitional Arrangement has been agreed with DEFRA, which will see a new weekly food waste collection service being delivered from 1 October 2027 across the county. This launch will be supported by a newly formed food waste project group, reporting to JWMB, which will seek to maximise the opportunities for joint working on specifications, operational arrangements and purchasing, linked to the new service.
- 4.29. The current proposed option will allow appropriate food waste to be promptly taken from the kitchen and stored in a hygienic manner through the provision of a 23 litre caddy bin for each household. This will allow the external storage of food waste ready for collection on a weekly basis.
- 4.30. There are currently no plans to allow the inclusion of food waste into the garden waste wheeled bin since the latter service is an optional 'paid for' service and the addition of food waste would require the whole receptacle to be collected on a weekly basis and without a charge notwithstanding the significant costs and further complexities in terms of disposal of a mixed food and garden waste stream via anaerobic digestion.

Funding and Costs

- 4.31. Full details of how the 'Simpler Recycling' proposals will be funded have emerged in stages over the last 12 months and there are still some elements that are awaited. However, the current known position is set out in the following paragraphs, and it highlights that the current funding does not meet the full costs of the responsibilities now mandated by Government.
- 4.32. In late November 2024, the Council was informed by DEFRA of our estimated 2025/26 payments from producers under the EPR scheme. The amount is currently projected to be £1,407,000; however, it could change due to further quality assurance processes as it has been produced from a complex formula that takes into account the following Rushcliffe specific factors:
- The frequency, pattern and type of collections of household packaging waste.

- The population density.
 - The type and accessibility of dwellings.
 - The levels of deprivation.
 - Government policies and the regulatory requirements affecting waste management in Rushcliffe.
- 4.33. The current known revenue costs of the changes that are required to the dry recycling service, which will be funded by the EPR payments are principally around the new kerbside glass recycling service and these are set out in Appendix A. When the scheme is fully operational the additional budget pressure is expected to be circa £190k per annum net of existing bring site budgets.
- 4.34. In addition to the revenue costs there are significant capital costs that will be incurred. The estimated cost of two new refuse freighters (offset by the sale of the two existing glass bring site vehicles) plus the acquisition of approximately 50,000 new 180L wheeled bins will be £1.69m (details in Appendix A).
- 4.35. It should also be noted that the Council is currently in negotiations with its glass processor on the rate per tonne paid for mixed glass and it is likely that a further tender exercise will be required in 2025. Although not associated with the change in regulations the additional income (estimated at £85k per annum) will help offset the additional costs above, and the increased income will be factored into the Council's budget upon completion of the exercise. This increase is not included in Appendix A.
- 4.36. On the 9 January 2024, all WCAs were contacted by DEFRA with information about the indicative capital funding allocated to each WCA for the introduction of weekly food waste collections. For Rushcliffe the amount was £1,156,919 which is expected to cover the cost of kitchen caddies, kerbside caddies, communal wheeled bins and 10 new collection vehicles. Any spare capacity WCAs require is also expected to be covered within this funding allocation. However, the funding is not index linked and this is particularly relevant given the transitional agreement in place until 1 October 2027 as the costs of receptacles and vehicles are likely to increase particularly as demand will also increase following these national changes.
- 4.37. The capital funding has been calculated in collaboration with the Waste and Resources Action Programme (WRAP), using a model that rather like the EPR assessment considers cost profiles of different housing stock, rurality, levels of deprivation, expected food waste yields, vehicle and container unit costs, and average collection round sizes. The model makes use of data inputted by local authorities on WRAPs Local Authority Portal.
- 4.38. In addition to the capital costs of the new food waste service there will be significant revenue costs associated with the employment of new collection staff (20 new posts), plus an additional co-ordinator post, fuel and vehicle maintenance etc. It is hoped that these costs will be covered by 'new

burdens' food waste transitional grant funding in 2025/26 and the Council is expected to be notified of what this will be in early 2025. Estimated high level revenue costs are included in Appendix A and are expected to total £1.26m

- 4.39. In order to support the financial impact of these changes and due to the staged approach to implementation, it is proposed to create a Simpler Recycling Reserve which will be detailed in the forthcoming budget report and Medium-Term Financial Strategy. This reserve will be used to smooth the effect of the additional costs utilising the EPR funding, The Collection Fund Reserve Balance is to be appropriated to the Simpler Recycling Reserve to 'gap fund' the extensive capital commitment required.

5. Alternative options considered and reasons for rejection

The main body of the report has already detailed how various collection options to comply with 'Simpler Recycling' requirements have been assessed and discounted along with the rationale.

6. Risks and Uncertainties

The changes required by 'Simpler Recycling' represent the biggest change in waste collection arrangement since the launch of the wheeled bin service in 2003. As a result there are a significant range of risks and uncertainties that will need to be fully considered in the project management of this change. However, for the purposes of this report the following represent the current situation:

- a) Capital and revenue financial uncertainty, in particular new burdens funding for food waste, which we await further information.
- b) Capacity of supply chain to meet unprecedented nationwide demand for specialist vehicles, caddies, and bins.
- c) Capacity and suitability of existing Depots to accommodate increased number of collection freighters and vehicles.
- d) Resident participation and engagement thus affecting anticipated recycling rates.
- e) Working with the JWMC and in particular the WDA and their contractor in terms of supporting infrastructure (waste transfer stations / anaerobic digestion facilities). Albeit the former has been mitigated by the opening of the new Colwick Transfer Station which is 'Simpler Recycling' compliant.
- f) Potential loss of garden waste income if customers cease to be part of the scheme as a result of the space needed for additional waste receptacles for food and glass.
- g) EPR and Food Waste grant income reduces over time or funding is lost within other wider government funding reforms.
- h) Inflation results in higher future costs.
- i) A larger fleet creates pressure on the future capital programme (in seven years time) with it being unlikely that further capital grants will be provided.

7. Implications

7.1. Financial Implications

7.1.1. Paragraphs 4.31 to 4.39 and Appendix A covers both revenue and capital financial implications. There is an overall revenue pressure of £318k, that maybe offset by the anticipated new burden Food Waste grant assuming this is recurrent annual grant.

7.1.2. Capital funding is not sufficient to meet the anticipated capital pressures of £3.31m for both food waste and glass kerb recycling collection. Due to the timing mismatch of receiving grants and delivering the service, a Simpler Recycling Reserve is proposed to drawdown and meet expenditure costs for capital acquisition (although not exclusively). Due to insufficient funding an appropriation from the current Collection Fund Reserve is proposed of £0.746m.

7.2. Legal Implications

7.2.1. The Environment Act 2021 amends section 45A of the Environmental Protection Act 1990 to include the requirement for waste collection authorities to collect glass, metal, plastic, paper and card, food waste, garden waste for recycling from all households. The introduction of 'Simpler Recycling' requirements is statutory, so failure to implement appropriate arrangements will be a breach of the Council's statutory duties. It is expected that Government will introduce statutory guidance for local authorities on waste collection which, when introduced, the Council need to have due regard to.

7.2.2. Any variation to existing contracts and / or procurement of new goods and services will need to be properly documented and undertaken in accordance with the relevant procurement legislation and the Council's adopted Contract Standing Orders.

7.3. Equalities Implications

The Council already has a comprehensive assisted collection scheme, which supports those with disabilities or other conditions which makes presenting their waste to the kerbside more difficult. Any changes required by 'Simpler Recycling' would be assimilated into this scheme and a refreshed Equalities Impact Assessment will be undertaken.

7.4. Section 17 of the Crime and Disorder Act 1998 Implications

Councillors have previously expressed concerns about moving to a kerbside separate glass recycling collection service, citing a risk of anti-social behaviour from the misuse of glass containers stored in open receptacles. The option presented within this report would ensure that glass put out for

collection is contained in a lidded wheel bin which should help to minimise any risk of misuse.

7.5. Biodiversity Net Gain Implications

No Biodiversity Net Gain implications.

8. Link to Corporate Priorities

The Environment	Minimising the impact on the environment including carbon management considerations is key factor in all aspects of delivering the new 'Simpler Recycling' collection service Such examples include the continued use of HVO to fuel the vehicles, the use of recycled plastic in the new receptacles and the organisation of new collection rounds to minimise mileage and emissions
Quality of Life	The collection of waste and recycling is an important statutory duty and basic public health requirement, which helps to ensure the quality of life for local residents
Efficient Services	The design changes required by 'Simpler Recycling' to the Council's collection arrangements must take into account of the need for efficient and effective service delivery
Sustainable Growth	None

9. Recommendation

It is RECOMMENDED that Cabinet:

- a) endorses the approach set out in paragraph 4.17 to align the Council's household waste collection arrangements with the 'Simpler Recycling' requirements;
- b) Supports the continuation of work with the Nottinghamshire Joint Waste Management Board to progress the wider operational planning for 'Simpler Recycling' implementation across the County; and
- c) Recommends that the Medium Term Financial Strategy (to be approved by Full Council) incorporates the financial implications (in Appendix A) and in particular the creation of a Simpler Recycling Reserve.

For more information contact:	David Banks Director Neighbourhoods and Deputy Chief Executive
Background papers available for inspection:	The Environment Act 2021 (legislation.gov.uk) The Extended Producer Responsibility Regulations Resources and waste strategy for England - GOV.UK (www.gov.uk)

	25 Year Environment Plan: progress reports - GOV.UK (www.gov.uk) Government response to the Consultation on requirements within The Environment Act 2021 - Government response - GOV.UK (www.gov.uk)
List of appendices:	Appendix A – ‘Simpler Recycling’ Revenue and Capital Costs

‘Simpler Recycling’ Revenue and Capital Costs

Revenue

(a) Glass Collection Revenue Budget

Costs are already included in the budget for the existing Glass Bring Sites, this includes two existing employees, therefore the costs in the table below are the *additional* costs of delivering a kerbside collection.

	2025/26	2026/27	2027/28	2028/29	2029/30
Staffing	73,300	183,500	186,600	189,800	193,100
Vehicle	5,500	27,200	37,200	37,200	37,200
Other Exp	-7,200	-6,300	8,700	33,700	33,700
Recycling Credits / EPR	-31,300	-75,000	-75,000	-75,000	-75,000
Total	40,300	129,400	157,500	185,700	189,000

- Staffing increase of 1 driver and 3 loaders (to make 2 drivers and 4 loaders in total) and associated on costs plus additional overtime, training, agency cover, PPE and the car parking levy at the Eastcroft Depot.
- Vehicle maintenance, fuel and tyres for the two larger new vehicles and much greater usage.
- Other expenses are the additional burden of replacements bins offset by savings in no longer providing the bring sites.

(b) Food Collection Revenue Budget

Costs below are based on 10 rounds

	2027/28	2028/29	2029/30
Staffing	505,600	1,028,900	1,046,800
Vehicle	81,500	163,000	163,000
Other Exp	26,100	46,200	51,200
Total	613,200	1,238,100	1,261,000

- The smaller food waste vehicles require a team of 1 driver and 1 loader per vehicle, It is estimated that we will need 10 teams in total. With 20 new members of staff (plus the glass collection) an additional co-ordinator post will also be required.

- Within the staffing budget allowance has also been made for additional overtime, training, agency cover, PPE, car allowances and the car parking levy at the Eastcroft depot.
- Increases are required for Vehicle maintenance, fuel, tyres, licences, tachograph and insurance.
- Other expenditure are mainly increases to the depot costs.

(c) Summary Revenue Position

Revenue	2025-26	2026-27	2027-28	2028-29	2029-30
Glass	40,300	129,400	157,500	185,700	189,000
Food *			613,200	1,238,100	1,261,000
Total	40,300	129,400	770,700	1,423,800	1,450,000
Loss of Recycling Credits **	231,300	275,000	275,000	275,000	275,000
EPR ***		(1,407,000)	(1,407,000)	(1,407,000)	(1,407,000)
New Burdens Funding ****					
Net Budget Pressure	271,600	(1,002,600)	(361,300)	291,800	318,000

*Early high-level estimate

** It is expected that recycling credits will be replaced with EPR grant

*** EPR only 2025-26 value guaranteed,

**** Announcements expected in March for 2025-26 and future years in the annual finance settlement.

Capital

(a) Glass Collection Capital Costs

The estimated cost of two new vehicles is £460,000.

Purchasing 50,000 new bins is estimated to cost £1,250,000.

Making a total capital commitment of £1,710,000 *

* Provisionally funded from EPR grant in draft capital programme and topped up with using some of the collection fund reserve.

Within the previous capital programme, we had already identified a replacement vehicle cost of £240k, this is now replaced with the costs in the table below.

(b) Food Collection Capital Costs

The estimated cost of ten new vehicles £1,100,000.

Purchasing 50,000 new bins (2 receptacles per household) would cost £ 500,000.

Making a total capital commitment of £1,600,000 *

* Provisionally funded Simpler Recycling capital funding grant of £1.157m and topped up with the EPR grant in draft capital programme and Collection Fund Reserve.

(c) Summary Capital Position

Capital	2025-26	2026-27	2027-28
Glass	1,710,000		
Food			1,600,000
Total	1,710,000	0	1,600,000
Simpler Recycling Capital funding	(1,157,000)		
EPR	(1,407,000)		
Collection Fund Reserve	(746,000)		
Capital Balance	(3,310,000)	0	0