

Simpler Recycling – Food Waste Collection Service

Report number:	CAB/WS/24/020	
Report to and date:	Portfolio holder decision	4 April 2024
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Decisions Plan: **Notice of Intention providing the purpose of the decision and the date in which the decision is expected to be made has been published on 25 March 2024.**

Wards impacted: **All wards**

Recommendation: **It is recommended that the Portfolio Holder for Operations:**

- 1. Approves the principle of the introduction of a weekly household separate food waste collection service from 1 April 2026 to meet new statutory requirements. Also seek to provide a commercial food waste collection service to qualifying businesses from 1 April 2025 to meet new statutory requirements.**

- 2. Gives delegated authority to the Director for Operations, in consultation with themselves as Portfolio Holder for Operations, to proceed with procurement individually and/or collectively with partner councils of the Suffolk Waste Partnership, to deliver the necessary equipment in respect of vehicles and bins which is expected to be funded by new burdens funding as well as any wider waste infrastructure required.**
- 3. The procurement outlined in (2) above will need to take due account of the new procurement legislation that is expected to come into effect later in 2024.**
- 4. Agrees that a detailed plan setting out the implementation arrangements for the new food waste collection service, including any further budget provision required to fund this process, be subject to separate consideration collectively by Cabinet (or, if agreed, Portfolio Holder for Operations) at a later date, and if necessary, Council.**
- 5. Agrees that a period of engagement be undertaken with all West Suffolk Councillors during March 2024 setting out the requirements and implications of the new statutory food waste collection service. This will include the potential implications of other aspects of the Government's 'Simpler Recycling' requirements, including potential changes to recycling and residual waste collections.**

1. Purpose of this report

1.1 Through the Environment Act 2021, Government has legislated for Councils to align their household waste and recycling services with new nationwide 'Simpler Recycling' requirements by 31 March 2026. Suffolk councils already meet many of the requirements, but we will need to either provide new services or alter existing services to collect:

- Glass bottles and jars
- Cartons
- Food waste on a weekly basis
- Plastic film (by April 2027)

1.2 The capacity of the supply chain to meet unprecedented nationwide demand for specialist vehicles and bins is a major risk to meeting these requirements. Much of the Suffolk requirement for vehicles and bins will relate to introducing a new collection service for food waste, so Suffolk councils are being asked to take food waste collection service decisions by early April 2024.

1.3 Further final decisions on recycling and refuse service changes will need to be taken by early summer 2024 and a further report with options and recommendations for those services will follow. This report therefore outlines work to date and the proposed recommendations for the new separate food waste collection service.

2. Justification for recommendations

Background

2.1 In December 2018 the Government published its Resources and Waste Strategy (RAWS). This was the first national review of waste policy for over 10 years and aims to reduce waste, improve recycling, and support the development of a 'circular economy'. A key element of the strategy is collection and packaging reform: providing nationwide consistency in recycling collections and driving reduction and improved recyclability of packaging through Extended Producer Responsibility (EPR). The Suffolk Waste Partnership (SWP), which is a partnership of Suffolk's County, District and Borough councils welcomed this publication and is unequivocal in its support of its overarching aims.

2.2 Government subsequently consulted on various RAWS policies in 2019 and 2021 and in November 2021, the Environment Act 2021 was passed providing the legislative framework through which the strategic waste reforms will be enacted.

2.3 The Simpler Recycling policy published in October 2023 has nationwide requirements to improve recycling required by the Environment Act 2021. To comply with these requirements, the Council must:

- a. Food waste – introduce a weekly separate collection of food waste from domestic households by 31 March 2026.
- b. Dry Recycling – increase the range of recyclable materials collected separately at the kerbside, adding glass bottles and jars, and cartons by 31 March 2026 and flexible plastics (e.g. bread bags, plastic films, etc) by 31 March 2027. This will require changes to existing kerbside recycling collection services and processing infrastructure.

This is shown pictorially in figure 1 below:



Figure 1 – Pictorial representation of waste collection changes for Suffolk.

- 2.4 These requirements will also apply to waste collected from businesses, healthcare establishments and academic institutions in England. If the organisation has ten or more full time employees, they will be required to plan for the collection of dry recyclable materials (except plastic film) and food waste by 31 March 2025 which is a year earlier than for households. This will be challenging for the council's trade waste service and represents some risk in terms of the income derived from these services. Micro-firms of less than ten full time employees will need to comply by 31 March 2027.
- 2.5 The most pressing issue is food waste and the recommendations in this report apply solely to this service. To achieve the Government's requirements on time, it is vital that Suffolk councils take decisions by early April 2024 relating to the introduction of a food waste collection service. This will allow the procurement of required service assets (vehicles, bins, etc) to commence. A prompt decision is required as lead times for manufacture of food waste collection vehicles are currently 12-18 months and will likely increase as further councils nationwide place orders to introduce new services.
- 2.6 Further final decisions on recycling and refuse service changes will need to be taken by early summer 2024 and a further report will come forward with recommendations for these changes.
- 2.7 The Government has set a clear legal requirement for Councils to introduce a separate weekly food waste collection service from all households by 31 March 2026. (This includes from business customers by 31 March 2025).
- 2.8 This means householders will be asked to separate their food waste into a council provided food bin of approximately 23 litres in size and leave it at

the kerbside or curtilage of their property for collection. A further caddy of approximately 5 litres will also be provided to householders for use in the kitchen. This provides the householder with somewhere convenient to store food waste in the short term and helps improve service participation and collection yields.

- 2.9 Across the whole of Suffolk, we expect to need 40-50 new food waste collection vehicles. With current lead times on these vehicles estimated at 12-18 months, and further pressure on the supply chain anticipated, all Suffolk councils intend to take food waste decisions by early April 2024. This will allow up to two years for the procurement, production and delivery of food waste vehicles and bins.

Food waste disposal and treatment

- 2.10 The SWP undertook food waste market research in 2022 and established that strong market interest exists for the processing of Suffolk collected food waste and the most likely technical solution would be through Anaerobic Digestion. This work, supported by Defra's Waste Infrastructure Delivery Programme (WIDP), also concluded that the best solution for the processing of collected food waste would be through a market driven procurement.
- 2.11 As the Waste Disposal Authority, Suffolk County Council will undertake the food processing procurement with support from all SWP councils. The procurement process will likely split the service down by geographic collection areas or district/borough specific lots. This would allow potential bidders to offer a whole county solution or bid for the material from a particular area/district/borough. A similar approach to procurement has previously been successfully adopted for garden waste composting facilities.
- 2.12 In addition to the need for new food waste treatment, SWP councils will need localised delivery points for the collected food waste to be deposited at. Suffolk County Council has begun work to assess the changes that will be required at transfer stations. The planning and construction timescales for these infrastructure changes are another reason that food service decisions need to be taken promptly.
- 2.13 Local solutions for disposal will always be investigated, looking at the benefits of reducing carbon emissions via the proximity principle i.e. treat as close to the point of origin.

Outstanding food service issues

- 2.14 Vehicle routes – an SWP officer group is also looking at potential vehicle routing solutions for the new food waste collection service. The work is again expected to be completed by the end of March and is looking at a number of scenarios to inform decisions including vehicles size, number and crew sizes.

- 2.15 Vehicle types – an SWP officer group is working to finalise the size and number of food waste collection vehicles which will be required. There are two main types under consideration: a 7.5 tonne and 11 tonne vehicle. Different sizes may be better suited to an urban or rural environment. The expectation is that this will be completed by the end of March 2024.
- 2.16 Bin type and colour – The ‘Simpler Recycling’ requirements offer an opportunity to align bin colours across Suffolk. As such, work is underway to identify what bin/caddy colour would be best for any new food waste service. By identifying a single countywide colour preference, we can simplify and improve public communications both during the service roll-out and in future years.

3. Alternative options that have been considered

- 3.1 There are no alternative options to providing a food waste collection service. The requirement has been mandated by Government legislation which clearly sets-out the nature of the service and timescales for its introduction.

4. Consultation and engagement undertaken.

- 4.1 Significant engagement has been undertaken with Government as these proposals have been developed through a number of consultations.
- 4.2 Whilst there has been no formal engagement with the public to date, we will need to undertake a significant communication campaign both Suffolk wide and in West Suffolk to inform residents and businesses of the service changes.

5. Risks associated with the proposals

- 5.1 There is a risk that if we do not progress the project in good time then we may not be able to meet our statutory duties within the specified timescale. Delay also risks increased costs for vehicles and bins which will be a seller’s market given the unprecedented demand.
- 5.2 There remains a risk that government funding through new burdens or Extended Producer Responsibility (EPR) may not cover the full additional net cost of these services.
- 5.3 Working as a collective through the SWP spreads the workload of what is a major change project. Whilst this mitigates the risk of project failure we will identify additional internal and external support to keep the project on-track.

- 5.4 A significant communications plan is required to communicate the service changes to all households in West Suffolk and to promote the required recycling behaviours.

6. Implications arising from the proposals

Financial

- 6.1 Simpler Recycling aims to significantly improve recycling services as well as introduce nationwide consistency. Government has committed that additional requirements will be funded in two ways: all costs relating to packaging waste and recycling costs will be met through packaging EPR payments from packaging producers and all other requirements on councils (e.g. for a new food waste collection service) will be funded by Government under the New Burdens doctrine. West Suffolk Council has been allocated a total of £1,697,717 under new burdens capital funding for vehicles and food waste bins.
- 6.2 One-off transitional new burdens revenue funding is also promised to support the introduction of food waste services but at present no further detail is available. However, it should be noted that new burdens funding is not expected to fund any required changes to existing waste infrastructure. This includes depots, transfer stations or the Material Recovery Facility (MRF).
- 6.3 Ongoing new burdens revenue funding is also promised to support all councils' ongoing costs of operating food waste services. This is expected to be applied to the Revenue Support Grant from April 2026 but at present no further detail is available.
- 6.4 Officers have repeatedly pushed Government, both as part of consultation responses and during regular engagement, that the provision of funding information is critical. As such, decisions on service change will need to be taken without full clarity on funding.
- 6.5 In 2022 the Suffolk Public Sector Leaders group allocated £375,000 of joint funding to support the countywide coordination and collaborative delivery of this major service change. This is expected to fund programme management, procurement oversight, expert advice such as collection round analysis/design and joint communications activity.

Legal compliance

- 6.6 The introduction of a food waste collection service is a statutory requirement so failure to do so will be a breach of our statutory duties.
- 6.7 Procurement activity will need to be compliant with our local policy and current national legal requirements. We will also need to be aware of the

upcoming changes to UK public procurement legislation and its potential impact to our procurement activities.

Environment or sustainability

- 6.8 Route optimisation is being used to keep collection mileage to a minimum. The market for electric waste collection vehicles is still in its infancy and prohibitively expensive so new vehicles will be of the latest Euro 6 internal combustion engine type.

HR or staffing

- 6.9 A new food waste service will require a significant number of additional frontline staff and is likely to also need additional support staff as well. Recruitment for these types of roles is already challenging so officers will look at potentially different approaches for recruitment and training to ensure we have the staff required to deliver the services from April 2026.
- 6.10 There has been no further information from the Government relating to funding to support the introduction of simpler recycling services (food waste and enhanced recycling services) for businesses.

7. Appendices referenced in this report

- 7.1 There are no appendices to this report.

8. Background documents associated with this report

- 8.1 There are no background documents associated with this report.