
Report to

Cabinet
Council

Date of meeting

23rd October 2007
30th October 2007

Report of

Director of City Services

Title

Response to Consultation – "Recycle on the Go"

1 Purpose of the Report

- 1.1 To seek approval for the authority's response to the above consultation and incorporates the comments to the responses from Scrutiny Board at their meeting held on 10th October 2007.

2 Recommendations

- 2.1 Cabinet is asked to recommend to Council the response attached to this report in Appendix 1. The response incorporates comments from the Scrutiny Board 3 meeting of 10th October 2007.

3 Information/Background

- 3.1 The Council has been invited to give its views on a consultation paper, "Recycle on the Go", which sets out a voluntary code of practice and good practice guide on the provision of public use recycle bins. The proposals are voluntary and principally concern how litter is collected for disposal or recycling in places that the public can use. The Government would like to see an extension of recycling from the home to places where the public have access. The desired outcome is about promoting positive behavior and citizen participation in reaching the ultimate goal articulated in the Waste Strategy for England 2007 of One Planet Living. The intention of the voluntary code of practice and the good practice guide is to provide advice on harmonising public place recycling schemes where appropriate, and to allow organisations to enjoy the benefits of recycling in a way that is joined up, consistent, and that the public is likely to recognise and therefore take part in. Government does not have any plans to legislate whilst voluntary measures are given chance to bed in. The development of the voluntary code of practise and good practice guide is viewed as the mechanism to help voluntary measures establish themselves.
- 3.2 This is a lengthy consultation document consisting of 58 questions, a large proportion of which are of a technical nature. Officers have prepared responses to the technical questions and these can be found at Appendix 1. The strategic questions requiring a

decision by elected members are considered in section 4 of this report and include comments from Scrutiny Board 3's meeting of 10th October 2007.

- 3.3 The document sets out the drivers and challenges in the context of the National Waste Strategy 2007 as follows:
- 3.4 *"In the Waste Strategy for England 2007, Government committed to cooperating with those with responsibility for managing litter on land that the public can access so that the public has access to more recycling bins. Government undertook at that time to consult on a voluntary code of practice and good practice guide.*
- 3.5 *The press release issued at the time included a challenge to see recycling extended from the home and office and taken into public areas like shopping centres, train stations and cinema multiplexes, so that it becomes a natural part of everyday life for English citizens.*
- 3.6 *Groups including the Airport Operators Association, British Council of Shopping Centres, Earls Court and Olympia Group, Highways Agency and the Local Government Association showed support for the thinking behind the challenge. Some have pledged action already, for example, the Royal Parks has committed to putting recycling bins in all its parks within the next 12 months and the Association of Event Venues says its members plan to install recycling bins for waste brought in by audiences at major events. Other organisations are considering action, but have not made any public statements. The organisations that were consulted at the time of the launch of the Waste Strategy for England 2007 agreed that guidance would be helpful and would allow consistency of approach, which in turn would be expected to aid success of public place recycling schemes. It demonstrates that recycle bins can be installed in outdoors and indoors locations by public and private organisations alike.*
- 3.7 *Government hopes that the information and case studies contained in the good practice guide and the underlying principles of the voluntary code of practice will help these and other sustainable-thinking managers of public places to consider providing recycle bins as one of the things that can be done to achieve sustainability. By seeking common ground, such as on iconography, it is anticipated that the public will be able to identify recycling points with ease and actively participate."*
- 3.9 The financial basis of the consultation document is based upon promoting litter recycling to minimise landfill, given the planned increase in landfill tax (currently £24 per tonne) to £48 by 2010/11. Coventry's position is different to many other authorities because it operates an Energy from Waste (EfW) plant and these financial benefits will not apply. Consideration should also be given that the litter collected from the city's litter bins is less than 1% of our total household waste and the majority of this waste is already treated through the EfW process.
- 3.11 The Authority is currently preparing a Draft Waste Strategy for Consultation. This strategy will give consideration to future recycling targets set by the Government through Local Area Agreements and any subsequent expansion to recycling such as the placement of public use recycling litter bins.

4 Proposal and Other Option(s) to be considered

- 4.1 Cabinet are asked to approve the responses to the following consultation questions below which include comments made at Scrutiny Board 3 and note those attached in Appendix 1.

Q1: Do you think that organisations should put in place recycle bins in public places? Why?

Yes

The provision of recycling containers in public places is a good idea providing that an infrastructure is put in place to service and maintain these areas. The provision of recycle bins should help to further expand the recycling message, providing they are correctly signed and managed. However, consideration should be given to managing the expected contamination levels.

Q2: Do you agree that Government should offer Guidance to organisations on setting up public place recycle bins?

Yes

Guidance to ensure commonality in signage etc would be a positive step and would support the National Waste Strategy.

Consideration needs to be given to individual organisation's street scene design or planning constraints, e.g. conservation areas.

Q28: Do you agree with the first principle of the Voluntary Code of Practice (at Part 5) on the provision of containers for recyclable waste alongside those for non recyclable waste?

Yes

The provision of non-recyclable waste bins alongside recyclable waste should however be mandatory.

Q29 Do you agree with the second principle of the Voluntary Code of Practice (at Part 5) that suggests that organisations installing recycle bins for public use should clearly promote recycling containers, including the adoption of common signage (i.e. the logos and colour) across England for recycling receptacles?

Yes

Defra should give due consideration to existing colour schemes and iconography to minimise the cost of implementation.

Q30 Principle 2 of the Voluntary Code of Practice asks for a commitment to move towards using common logos and signage on receptacles. The Good Practice Guide recommends use of the iconography developed by Recycle Now, the national recycling campaign. Would your organisation be prepared to make this commitment?

Yes

Defra should take into account the lessons learnt from the changeover of the "Rethink Rubbish" logo to the current national logo and utilise existing iconography wherever possible.

Q36: Would your organisation be interested / prepared to sign up to this Voluntary Code of Practice?

Yes

Coventry would be prepared to sign up to this approach providing it was introduced on a phased basis and this will need to be considered in the context of Coventry's broader waste management strategy.

Q42: Is there anything that you think Government should do to help organisations adopt the signage developed by Recycle Now/WRAP?

Yes

Give assurances that no changes will be made to the proposed new iconography following its introduction, for significant period of time. Provide funding to contribute towards the cost of bins and replacement signage to conform to the new iconography.

5 Other specific implications

5.1

	Implications (See below)	No Implications
Best Value		✓
Children and Young People		✓
Climate Change & Sustainable Development		✓
Comparable Benchmark Data		✓
Corporate Parenting		✓
Coventry Community Plan		✓
Crime and Disorder		✓
Equal Opportunities		✓
Finance		✓
Health and Safety		✓
Human Resources		✓
Human Rights Act		✓
Impact on Partner Organisations		✓
Information and Communications Technology		✓
Legal Implications		✓
Neighbourhood Management		✓
Property Implications		✓
Race Equality Scheme		✓
Risk Management		✓
Trade Union Consultation		✓
Voluntary Sector – The Coventry Compact		✓

6 Monitoring

6.1 The outcome of this consultation process will be monitored during the production of the authority's waste strategy.

7 Timescale and expected outcomes

7.1 Responses to the consultation are to be submitted by 2nd November 2007.

	Yes	No
Key Decision		√
Scrutiny Consideration (if yes, which Scrutiny meeting and date)	√ Scrutiny Board 3 10th October 2007	
Council Consideration (if yes, date of Council meeting)	√ 30th October 2007	

List of background papers

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Papers open to Public Inspection

Description of paper

Location

Consultation Paper

www.defra.gov.uk

**Department for Environment, Food and Rural Affairs
Consultation on Recycle on the Go: Response Proforma**

Please use this proforma to answer the questions that are posed in the consultation paper on Recycle on the Go. The closing date for responses is **Friday, 2 November 2007**.

Please email your response to: local.environment@defra.gsi.gov.uk

Please mark the subject field **Recycle on the Go Consultation**.

Alternatively, you can return the form by post, to:

Recycle on the Go Consultation, Local Environment Quality Team, Area 3B,
Nobel House, 17 Smith Square, London, SW1P 3JR.

The addresses may also be used for general enquiries relating to this consultation.

To help us analyse responses, please provide details of your name and / or your organisation in any correspondence, and in the table on the next page.

In line with Defra's policy of openness, at the end of the consultation period copies of the responses we receive may be made publicly available through the Defra Information Resource Centre, Lower Ground Floor, Ergon House, 17 Smith Square, London SW1P 3JR. The information they contain may also be published in a summary of responses. If you do not consent to this, you must clearly request that your response be treated confidentially. Any confidentiality disclaimer generated by your IT system in email responses will not be treated as such a request.

You should also be aware that there may be circumstances in which Defra will be required to communicate information to third parties on request, in order to comply with its obligations under the Freedom of Information Act 2000 and the Environmental Information Regulations. Further information can be found at <http://www.defra.gov.uk/corporate/opengov/index.htm>.

The Information Resource Centre will supply copies of consultation responses to personal callers or in response to telephone or email requests (020 7238 6575, defra.library@defra.gsi.gov.uk). Wherever possible, personal callers should give the library at least 24 hours' notice of their requirements. An administrative charge will be made to cover photocopying and postage costs.

This form is provided as a way that you can record your answers to the questions in the consultation paper. Responses including any general comments you might wish to make are welcome on any number of the questions. Where applicable, it would be helpful if you could indicate whether you agree, disagree or are uncertain by marking the tick boxes. Please leave the response box blank for any questions that you do not wish to answer.

Please save the form to your computer regularly while your entering your answers to avoid any unintentional loss of data.

Your Details

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Date of Response	2 nd November 2007

Responses to Consultation Questions

Questions in 'Part 3 – Rationale' of the Recycle on the Go Consultation Paper	
Question 1: Do you think that organisations should put in place recycle bins in public places? Why?	
Yes	<input checked="" type="checkbox"/> No <input type="checkbox"/> Not Sure <input type="checkbox"/>
The provision of recycling containers in public places is a good idea providing that an infrastructure is put in place to service and maintain these areas. The provision of recycle bins should help to further expand the recycling message, providing they are correctly signed and managed. However, consideration should be given to managing the expected contamination levels.	
Question 2: Do you agree that Government should offer Guidance to organisations on setting up public place recycle bins?	

Yes No Not Sure

Guidance to ensure commonality in signage etc would be a positive step and would support the National Waste Strategy.

Consideration needs to be given to individual organisation's street scene design or planning constraints, e.g. conservation areas.

Question 3: Would organisations find it helpful if Government developed a straightforward tool that you could use to give a broad estimate of the cost benefit in their context using data from the Impact Assessment?

Yes No Not Sure

Providing all reasonable options are included, i.e. currently using landfill; has a MRF; uses incineration; whether the organisation would be involved in collections and the type of vehicles used/required. It is important that schemes can be adopted within existing/proposed local initiatives.

Question 4: Do you agree that voluntary measures should be tried before considering legislation?

Yes No Not Sure

However, a flexibility in approach is required to encourage participation from the public.

Question 5: Do you agree with the rationale set out in section 3.1? i.e. Do you agree that there is a case for Government intervention, and that it should be in the form of a voluntary code of practice and good practice guide?

Yes No Not Sure

In principal yes, particularly with reference to iconography in order that recycling systems are easily recognised and followed across the country.

Question 6: Do you agree that Government should recommend use of Recycle Now's iconography so that recycle bins for public use are consistent with the national recycling campaign?

Yes No Not Sure

There should be an agreed common format so that recycling facilities can be instantly recognisable across the country. However, there may be cost implications dependent on the individual organisation's existing circumstances. There would also be the need to universally accept the suggested signage and to ensure that the EU or other body are not planning an alternative or addition.

Question 7: Do you agree with the context in which the consultation documents are set? (Which is summarised in Part 3.3)

Yes No Not Sure

Broadly in agreement with the context, however those organisations using incineration may have difference requirements.

Question 8: Do you agree that commercial freedoms should not be affected insofar as possible?

Yes No Not Sure

The type, style and construction should be left for organisations to decide. It is the Iconography that is the common factor.

Question 9: If a central website was set up, what should it contain?

It should contain the existing litter recycling initiatives, including collection methods that are available and planned for the future for each organisation. Appropriate contacts may be worthwhile, having web links into individual organisations showing more details of each scheme.

Question 10: Would organisations find it helpful to register that they are running schemes on a central website that the public and others can view?

Yes No Not Sure

Other organisations can learn from experience and would provide information on how effectively the scheme was running, in particular what infrastructures were in place.

Question 11: Would organisations be interested in submitting a summary of what they put in place on a central website that the public and others can view?

Yes No Not Sure

Agreement in principal however would suggest providing links via the organisation's own web site where the information is kept. This would ensure information is up to date and save duplication.

Question 12: If an organisation has put in place recycle bins for public use, should the public be able to comment on the running of the scheme or any problems/complaints? If so, who should be the point of contact for such comments / enquiries?

Yes No Not Sure

To avoid unnecessary beaurocracy and duplication it is important that the local authority should be the first point of contact.

Questions in 'Part 4 – Evidence Base' of the Recycle on the Go Consultation Paper

Question 13: Do you have any 'evidence' that you would wish to submit? (Please feel free to provide a summary in the space below, or to attach additional information with your reply.)

Yes No Not Sure

Coventry does not presently have any recycling litter bins but uses standard general litter bins that in many cases incorporate dog waste.

Question 14: Have you carried out a waste fraction analysis or know of an organisation that has and that would be suitable for enhancing the economic model used in the Impact Assessment?

Yes No Not Sure

There has been no waste analysis on street litter collections in Coventry except from waste statistics which amounts to approximately 1% of total household waste. This is separate from mechanical sweeper waste which is approximately 2%, of which approximately 94% is being recycled, utilising facilities at a local transfer station. Using the 3% figure from your report for general litter waste seems optimistic and requires further analysis. MEL, Aston Science Park, Birmingham, e info@m-e-l.co.uk has carried out a variety of waste analysis studies and would be worth contacting.

Question 15: The economic model in the Impact Assessment considers paper, cans and glass as materials that are likely to be collected for recycling. Are there any other materials that your organisation would be likely to collect as part of a recycling scheme and that should be considered?

Yes No Not Sure

Plastics, however which polymers would be dependent upon available facilities/market forces. Cardboard should also be considered, in particular the packaging of fast foods.

Question 16: Have you formed a view already about the type of bin you would be most likely, or already use, to collect litter for recycling?

Yes No Not Sure

Not at present.

Question 17: Are there particular barriers to selling particular materials as recyclable material?

Yes No Not Sure

The City Council has taken a view that it does not want recyclable materials to be taken out of the country for reprocessing but would rather wait until facilities with sufficient capacity are available in the UK before considering a full range of materials.

Question 18: The economic analysis assumes a purchase price of between £484 and £600 for a new recycling bin facility. Is this a reasonable estimate in your experience?

Yes No Not Sure

The idea of bracketing costs as shown does not allow for local requirements where larger, more expensive bins will be required or where local authorities are creating a theme to improve the local living environment. In these instances, bins may cost considerably more than indicated in your report.

Question 19: The economic analysis assumes a recycling bin lifetime of between 5 and 10 years. From experience is this a fair assumption?

Yes No Not Sure

This seems to be reasonable. However, this is dependent upon the material used to manufacture the bin, i.e plastic versus cast iron.

Question 20: Installation costs are assumed to lie between £30 and £95 per recycling unit. From experience is this a fair assumption?

Yes No Not Sure

The installation costs for the 90ltr sets seems reasonable, although with reference to the response to Q18 would be considerably higher.

Question 21: Servicing costs are assumed to lie between £111 and £321 per recycling unit. From experience is this a fair assumption?

Coventry has no experience of these types of bins at present, but based on existing practice this does not seem unreasonable. However, this will be influenced by the level of segregation adopted by each authority.

Question 22: The analysis assumes contamination rates between 5% and 10%. From experience is this a fair assumption?

Yes No Not Sure

Household kerbside collection schemes operate at 5% contamination or less i.e. material that requires disposal. However, bring recycling centres do give other problems, mainly cross contamination of glass colours resulting in reduced product value. As we currently do not have any litter recycling containers, Coventry is in no position at the present time to contradict your findings.

Question 23: The analysis assumes that an average Local Authority has 1,000 public litter bins. Is there any more information regarding this assumption?

Yes No Not Sure

In Coventry there is in excess of 2,500 litter bins.

Question 24: Do you have a view about sponsorship of on-street recycling facilities? Is this something that you have pursued? What were the outcomes?

Yes No Not Sure

This is something that Coventry is prepared to consider.

Questions in 'Part 5 – Proposed Voluntary Code of Practice' of the Recycle on the Go Consultation Paper

Question 25: Is it necessary to pledge formal commitment to the Voluntary Code of Practice?

Yes No Not Sure

No, because it is a voluntary code of practice.

Question 26: If you agree with formal commitment, how should organisations/managers be asked to pledge their commitment? E.g. self certification, registration on a website?

Please refer to the answer in Q25.

Question 27: If you agree that some form of repository be set up to record the commitments made, who should hold that information? E.g. Central Government, a third sector body such as Encams or WRAP, organisations themselves?

N/a

Question 28. Do you agree with the first principle of the Voluntary Code of Practice (at Part 5) on the provision of containers for recyclable waste alongside those for non-recyclable waste.

Yes



No



Not Sure



The provision of non-recyclable waste bins alongside recyclable waste should however be mandatory.

Question 29: Do you agree with the second principle of the Voluntary Code of Practice (at Part 5) that suggests that organisations installing recycle bins for public use should clearly promote recycling containers, including the adoption of common signage (i.e. the logos and colours) across England for recycling receptacles?

Yes



No



Not Sure



Defra should give due consideration to existing colour schemes and iconography to minimise the cost of implementation.

Question 30: Principle 2 of the Voluntary Code of Practice asks for a commitment to move towards using common logos and signage on receptacles. The Good Practice Guide recommends use of the iconography developed by Recycle Now, the national recycling campaign. Would your organisation be prepared to make this commitment?

Yes



No



Not Sure



Defra should take into account the lessons learnt from the changeover of the "Rethink Rubbish" logo to the current national logo and utilise existing iconography wherever possible.

Question 31: Principle 2 suggests that existing schemes should standardise signage within 18 months; is this a reasonable timescale or would you suggest a different amount of time?

Yes



No



Not Sure



Timescales will be fully dependent on financial resources/funding.

Question 32: Do you agree with the third principle of the Voluntary Code of Practice (at Part 5) that suggests that organisations installing recycle bins for public use should implement an effective management programme, including appropriate maintenance of the infrastructure (i.e. the bins and signage)?

Yes



No



Not Sure



Yes.

Question 33: Do you agree with the fourth principle of the Voluntary Code of Practice (at Part 5) that suggests that organisations installing recycle bins for public use should reuse, recycle and compost the materials collected?

Yes.

Question 34: Is anything missing from the list in the summary to the voluntary code of practice?

Yes



No



Not Sure



The voluntary code of practice should include:

- Bring/civic amenity sites
- Kerbside collections

Question 35: Has anything been included that should not be contained in the summary to the voluntary code of practice?

Yes

No

Not Sure

No.

Question 36: Would your organisation be interested/prepared to sign up to this Voluntary Code of Practice?

Yes

No

Not Sure

Coventry would be prepared to sign up to this approach providing it was introduced on a phased basis and this will need to be considered in the context of Coventry's broader waste management strategy.

Question 37: What would be an appropriate time to review the Voluntary Code of Practice and associated Good Practice Guide?

Probably around 2010, the first target year of landfill diversion.

Question 38: What do you think would be the best way to evaluate the effectiveness of the Voluntary Code of Good Practice and associated Good Practice Guide?

Information from authorities on participation and contamination levels.

Questions in 'Part 6 – Proposed Good Practice Guide' of the Recycle on the Go Consultation Paper

Question 39: Do you agree with the aim of the Good Practice Guide, which is set out in the introduction to the Guide at Part 6?

Yes No Not Sure

Yes

Question 40: Do you need more information in the Good Practice Guide on how to manage contracts for handling recyclable waste once it has been deposited in recycle bins?

Yes No Not Sure

No

Question 41: Do you have experience of particular locations that work well and / or not well for collecting litter for recycling?

Yes No Not Sure

Not for litter but for bring recycling schemes.

Question 42: Is there anything that you think Government should do to help organisations adopt the signage developed by Recycle Now / WRAP?

Yes No Not Sure

Give assurances that no changes will be made to the proposed new iconography following its introduction, for significant period of time. Provide funding to contribute towards the cost of bins and replacement signage to conform to the new iconography.

Question 43: Do you feel that your organisation would need co-mingled icons, or would you use individual icons together? Are there any specific combinations that you would like to be able to use?

Yes

No

Not Sure

Given the change in emphasis from kerbside separation to co-mingled collection, a co-mingled icon is required.

Question 44: Is there any information missing from the Good Practice Guide?

Yes

No

Not Sure

The Good Practice Guide sets out the basic elements that should be considered when implementing such schemes. However, the financial implications for bins required in themed areas have not been included.

Question 45: Is there anything further that Government or others should be doing that isn't included in the Good Practice Guide?

Yes

No

Not Sure

Coventry fully supports the principals of the guide, however anticipates significant difficulty with contamination.

Question 46: Is the Good Practice Guide helpful in offering advice on setting up public place recycle schemes?

Yes

No

Not Sure

Question 47: Does the Good Practice Guide (at Part 6) underpin the principles in the Voluntary Code of Practice (at Part 5)?

Yes

No

Not Sure

The good practice guide is not practical in applying the principals to current local authority specifications and practices.

Question 48: Is the Good Practice Guide clear? If you think something should be done to improve it, please outline your suggestion below.

Yes

No

Not Sure

Yes the GPG is clear.

Question 49: Do you have any examples of providing recycling facilities in public places that you would like to consider including in the final guidance?

Yes

No

Not Sure

Not for litter recycling.

Question 50: Do you know of any other good examples of similar schemes that have worked well? Please enter details here, and attach any materials if you wish.

Yes

No

Not Sure

No

Question 51: Do you think that packaging should include iconography that corresponds to that used on recycle facilities?

Yes No Not Sure

Questions in 'Part 7 – Case Studies' of the Recycle on the Go Consultation Paper

Question 52. Are the case study examples given in Part 7 helpful? Are any not helpful?

Yes No Not Sure

However, an example of a low landfilling authority would have been useful.

Question 53. Would information about these case studies be best served in the main body of the Good Practice Guide or as a separate appendix?

Yes No Not Sure

Separate appendix as other examples can be more readily added.

Question 54. Would a web-based repository of case studies that organisations can contribute towards be helpful?

Yes No Not Sure

Question 55. Do you have more examples to add?

Yes

No

Not Sure

No.

Question 56. Are any topics or areas missing from the case studies?

Yes

No

Not Sure

Question 57. Based on the case studies, do you think that public place recycling could be provided in virtually any circumstance?

Yes

No

Not Sure

The availability of a suitable infrastructure is likely to be prohibitive.

Additional question in 'Part 9 – Summary of Questions / Points' of the Recycle on the Go Consultation Paper

Question 58. Are there any other comments that you would like to make or any additional information that you would like to include? Please feel free to attach additional materials.

Yes



No



Not Sure



Coventry is concerned that consideration does not appear to have been given to existing kerbside facilities or any existing colours/icons used on containers.

Thank you for your comments.

Please return by email to: local.environment@defra.gsi.gov.uk

The closing date for comments is Friday, 2 November 2007

Or by post to: Recycle on the Go Consultation, Local Environment Quality Team, Area 3b, Nobel House, 17 Smith Square, London, SW1P 3JR.