

Central Bedfordshire Council

EXECUTIVE - 31 March 2015

Technical Environmental and Economical Practicability (TEEP) Assessment of the Waste Collection Services in Central Bedfordshire

Report of Cllr Brian Spurr, Executive Member for Community Services
(brian.spurr@centralbedfordshire.gov.uk)

Advising Officers: Marcel Coiffait, Director of Community Services
(marcel.coiffait@centralbedfordshire.gov.uk) and Tracey Harris, Head of Waste, Waste Services (Tracey.Harris2@centralbedfordshire.gov.uk)

This report relates to a non-Key Decision

Purpose of this report.

1. To consider and adopt the Technical, Environmental, and Economical Practicability Assessment of the waste collection services in Central Bedfordshire in response to new waste regulations that came into force from January 2015.

RECOMMENDATIONS

The Executive is asked to:

1. **adopt the Technical, Environmental and Economical Practicability Assessment.**

Overview and Scrutiny

2. This report has not been considered by Overview and Scrutiny.

Policy Background

3. The European Commission's Waste Framework Directive includes an obligation that separate kerbside collection of paper, glass, metals and plastic must be implemented by January 2015.

4. The Framework was transposed into UK law through the Waste (England and Wales) Regulations 2011 (in particular Regulation 13), and amended in 2012. The Waste Regulations interpret compliance with the Waste Framework Directive by allowing co mingled collections unless separate collections are necessary to improve quantity and quality of recycling, and as long separate collections are not technically, environmentally or economically practicable (TEEP).
5. In order to comply with the Waste Regulations the Council is required to demonstrate that they have considered separate collection for the 4 materials, and concluded that it is either;
 - a. Not necessary to ensure appropriate quality of material for its intended end use (i.e. it is a matter for MRF supplier technologies and onward materials markets);
 - b. Not practicable in regard to TEEP.
6. In the absence of any case law and formal governance guidance, a Waste Regulations Route Map was produced by a working group consisting of members including Waste and Resources Action Programme (WRAP). The Route Map is intended to help local authorities that collect waste to understand their legal obligations under the regulations providing a step by step process to assess whether their waste collection services are compliant with the requirements of the Waste Regulations.
7. The completion of the Waste Regulation Route Map forms the TEEP assessment which has been compiled by the Council and is attached Appendix A.

Current Recycling Collections

8. Central Bedfordshire Council currently collects comingled recycling from residents as part of the alternate weekly collection schedule. Items that can be recycled at the kerbside include paper, card, cartons, tins, cans, aerosols, plastic bottles, plastic pots, tubs and trays, and plastic film.
9. Residents are able to dispose of green waste free of charge as part of the fortnightly garden waste service. A food waste collection service was introduced in 2007 and rolled out to all households in the north of the authority area (formally Mid Bedfordshire) in 2008, offering a weekly collection of food waste.
10. Glass is collected at the kerbside from approximately 13,000 households in south of the authority area following a trial by South Beds District Council in 2003. Glass is also collected via a network of more than 100 bring banks across the authority.

Waste Regulations Route Map

11. To ensure that the requirements of Regulation 13 are met, the feasibility of implementing separate collections in the authority area has been investigated. This investigation is Step 3 & 4 of the Waste Regulations Route Map and evaluates whether or not such an arrangement would be TEEP.
12. Steps 3 and 4 of the Waste Regulations Route Map look at applying the waste hierarchy to materials collected and deciding if separate collections of paper, glass, metal and plastics are required (TEEP) the results of which have been summarised below.

Step 3 – Waste Hierarchy

13. The Council has been able to demonstrate its current collection methodology complies with the waste hierarchy except where compliance is “not reasonable in circumstance” (i.e. not technically viable or cost prohibitive).

Step 4 – Necessity Test

14. Step 4 of the Route Map required the Council to first undertake the Necessity Test to establish if collecting paper, glass, card and plastic would improve the quality of materials collected or facilitates and increase in the quantity. Results demonstrate for Central Bedfordshire that in the case of glass, a higher quantity of material would be collected and in all cases better quality material would be collected if these four materials were to be separately collected. The results therefore required the Council to undertake the full Practicability Test (TEEP assessment).

Step 4 – Practicability Test (TEEP)

15. The technical element of the assessment looks at the technical ability of the Council to separately collect the four material types. This part of the assessment was passed, with other local authorities with similar characteristics in relation to size and housing stock already collecting materials separately, demonstrating it would be technically feasible for Central Bedfordshire to introduce.
16. In order to undertake the environmental and economical testing elements the Council modelled a variety of collection methodologies to ensure all options were fully considered.
17. Environmental – Separate collections will have negative environmental implications as a result of additional vehicle emissions, a possible increase in traffic congestion and the manufacture of separate collection containers. The environmental benefit of reprocessing of additional material does not offset these implications.

18. By undertaking an economical test, the Council has demonstrated that introducing separate collections would be significantly more expensive than the current collection methodology. Separate collections of paper, metal, glass and plastics would be more expensive due to the increase in collection costs (additional vehicle, staffing, containers required.) The service has a £200k pressure in 15/16 and £386k pressure in 16/17 which, although a better position than in previous versions of our Medium Term Financial Plan, still puts pressure on the Council's finances at a time when the government grant is decreasing year on year. As a result the economical assessment is that separate collection of the four materials is not financially practicable.

Reasons for decision

19. In order to comply with the Waste Regulations (England and Wales) 2011 and in particular Regulation 13, the Council is required to approve the TEEP Assessment provided in Appendix 1.
20. Where the necessity test indicates a need to collect a material separately to improve quantity or quality, comingled collection of that material is only allowable where it can be demonstrated that separate collection is not practicable. However, separate collection must meet all three elements of the Practicability Test to be required, i.e. be "technically, environmentally and economically practicable" (TEEP). If it fails any one of them then comingled collection is permissible.
21. The Council has failed two elements of the TEEP assessment suggesting that for reasons of both environmental and economical impracticability it is considered unnecessary for the Council to introduce separate collections of paper, metal, glass and plastic.

Council Priorities

22. The adoption of the TEEP assessment and the continuation of the existing comingled kerbside collections of recyclable waste supports three of the Council's key priorities – Provide Value for Money, Enhance Central Bedfordshire and Quality Universal Services for the following reasons:
 - a) Continuing to provide a range of recycling services whilst maintaining the existing collection fleet and infrastructure not requiring any additional investment.
 - b) Keeping the number and movement of waste vehicles down to a minimum by collecting comingled recyclables.
 - c) Continuing to provide excellent recycling and waste collection service to Central Bedfordshire residents.

Corporate Implications

Legal Implications (To be confirmed reviewed by Legal)

23. Central Bedfordshire is a unitary authority responsible for both the collection and disposal of waste and recyclable materials collected at the kerbside.
24. The Waste (England and Wales) Regulations 2011 (as amended) provide that separate collection of paper, metal, plastic and glass need only be taken if these are technically environmentally and economically practicable. As set out in the Central Bedfordshire assessment for environmental and economical reasons separate collections are not considered practicable.
25. By completing the TEEP assessment and seeking Executive approval the Council is fulfilling its obligation to comply with The Waste (England and Wales) Regulations 2011 (as amended).

Financial Implications

26. The continued collection of kerbside comingled recyclable material is provided for within the current revenue budget. The assessment concludes that it is not economically practicable to change our current collection method; therefore we are under no obligation.

Equalities Implications

27. Central Bedfordshire Council has a statutory duty to promote equality of opportunity, eliminate unlawful discrimination, harassment and victimisation and foster good relations in respect of nine protected characteristics; age disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The recommendations included in this report do not impact on equality.

Sustainability

28. Sustainability and environmental impact have been a key consideration of the TEEP assessment. The assessment demonstrates that moving to a kerbside sort of recyclable waste in order to achieve the separation of materials as set out in Regulation 13 would result in a significant rise in CO₂ emissions as a result of an increase in the number of collection vehicles required and journeys made. The use of additional vehicles would have negative implications for traffic, noise and pollution. By maintaining the existing collection regime the CO₂ impact will remain unchanged.

29. The appropriate officers have consulted and have provided input on the environmental assessment undertaken.

Risk Management

30. By adopting the TEEP Assessment as set out in this report the Council is ensuring the continued delivery of its existing collection services and complying with the Waste Regulation (England and Wales) 2011. Failure to adopt the assessment may result in a legal challenge to the Council.

Conclusion and next Steps

31. In order to comply with the requirements of the Waste Regulations (England and Wales) 2011 the Executive are asked to adopt the Assessment provided in Appendix 1. The alternative collection options have been shown to not be environmentally or economically practicable therefore no changes are required.

Appendices

The following Appendices are attached:

Appendix A – TEEP Assessment

Appendix B – Supporting data - Exempt

Background Papers

32. None