

RESPONSE BY THE RURAL SERVICES NETWORK (RSN) TO THE DEFRA CONSULTATION RELATING TO CONSISTENCY IN HOUSEHOLD AND BUSINESS RECYCLING IN ENGLAND.

ABOUT THE RSN

The Rural Services Network (RSN) is the national champion for rural services, ensuring that people in rural areas have a strong voice. It is fighting for a fair deal for rural communities to maintain their social and economic viability for the benefit of the nation as a whole.

The RSN membership comprises over 100 local authorities (counties, unitaries, districts and boroughs) from across England and over 200 other public, private and civil society sector organisations, such as fire and rescue authorities, housing associations, health providers, utility companies and community associations. As well as rural/market town membership of over 200 parish/town councils

The RSN is a member of Defra's Rural Impacts Stakeholder Forum.

GENERAL COMMENTS IN RESPECT OF THE CONSULTATION

The RSN will not be responding to the specific detailed questions posed in the consultation but understands that its District and Unitary Councils, in particular will do so.

Instead, through this response document, the RSN will, under a number of sub-headings, focus on the main over-arching issues which will impact on rural waste collection authorities and rural communities generally.

The New Burdens Guidance

The Government states in its Consistent Recycling proposals that it recognises that new duties will impose additional costs on local government, and it will follow the new burdens guidance to ensure the costs of new statutory duties for local authorities are covered. **The RSN has the following concerns regarding the New Burdens doctrine.**

- With the present and historic unfairness to rural areas of the Funding Formula for Local Government (with urban areas receiving via that formula significantly more government money per head of population than rural areas) it is feared that whilst the amount of new money to meet the cost of the new burdens may cover 100% at a national level it is unlikely to do so at a rural level.
- Refuse Collection/Recycling is a huge cost for rural Districts. New costs for statutory duties not matched by income (government financial support or net fee income) will either increase Council Tax (but increases are capped and rural already pays much more per head than rural) or see other services reduced, or a mixture of both.

- Whilst at the national level one-off implementation costs/set up/transition costs (capital and revenue) are covered under the Doctrine **recurring-costs are only guaranteed for a minimum of the first 3 years.**
- The proposals are likely to have major cost implications for infrastructure, such as MRFs and Transfer Stations and the need for more or larger or differently located depots. These must be included in the cost considerations.

Rural Proofing

The following is a quote from Defra's Report "Rural Proofing in England 2020" recently published.

"The process of rural proofing involves examining government policies closely from a rural perspective throughout their development and adjusting them as needed to ensure that their intended outcomes can be realised in rural areas.

Questions that may help inform rural proofing include:

- What are the intended outcomes for rural areas?
- How might outcomes differ between rural and urban areas?
- How are the outcomes to be delivered in rural areas?
- What are the potential issues and challenges?
- How might the situation vary between different types of rural area?
- What are the target populations and how might they be affected or disadvantaged?
- In the case of funding, are rurality or sparsity taken into account?
- What are the dependencies, if any, with the responsibilities of other departments?
- Which bodies could be involved in delivering the outcomes in rural areas?
- What evidence is needed?

We can see no evidence of rural proofing in this consultation which is particularly disappointing given that it is a Defra Consultation. It is not appropriate for Whitehall Departments to publish Green Papers or policy proposals or Consultations without considering the questions quoted above and then claim to have achieved rural proofing because those proposals receive responses from rural local authorities and stakeholders.

General Support for the Proposals

Whilst the RSN member authorities are supportive of the overall aims of the Government's proposals it is nevertheless felt that, particularly in the rural context, Councils should be allowed local flexibility to design services and service composition to reflect local circumstances – to include decisions on charging for garden waste the collection of food waste and the type of dry recycling collections.

It should be acceptable to collect materials together as long as the quality requirements of end markets are met. There would be a number of financial and operational challenges for those councils using twin-stream and comingled collections to switch to multi-stream collections, with little gain in terms of the

tonnage of recyclable materials collected. The RSN takes a similar view on residual waste collections, believing that decisions on containers and collection frequencies are best taken locally.

Members support the national standardisation of items suitable for recycling. The need to ensure that there are end markets for the collected recycling materials throughout the country so that collection costs can be offset.

Opportunity should be taken to incentivise community collection of recycling materials which could provide a financial return to the local community concerned.

Specific Cost related Issues which could impact disproportionately on rural areas:

- In those areas where food waste is already collected a requirement to have to switch to twin stream or source separated for dry recycling there would be a need to increase the number of staff and collection vehicles. One of our unitary council members has estimated that changing to twin-stream collections would likely to need 5 more vehicles at a cost of £750,000 a year additional revenue costs.
- Many rural roads are simply not big enough for large refuse collection vehicles and so a vehicle fleet in rural areas needs to be much bigger in numbers and types of vehicles. Smaller vehicles, by definition, have less capacity meaning more trips to the recycling centre per day increasing costs of mileage, wear and tear on vehicles and travelling time for the operatives.
- Because private sector markets are much less prevalent in rural areas it will be especially important that there is flexibility around when contracts will be required to meet the new requirements. It will always be cheaper and more cost effective to make changes at the end of contract terms than having to re-negotiate with suppliers (or receivers of collected recycled materials) mid-term.
- HGV driver shortages are widely reported.
- There are concerns over vehicle providers' ability to meet demand if a large number of councils need to switch collection systems and order new vehicles around the same time. These factors might mean that consistency requirements have to be phased in over a slightly longer period of time.
- Materials Recycling Facilities (MRFs) – would need to be reconfigured to deal with additional types and quantities of materials, with some of the proposed

materials presenting some sorting challenges. The collection of materials would be dependent on investment in MRF infrastructure, the majority of which is commercially owned and operated.

- End markets – the markets for some recyclable materials are weaker and reliant on exports; many of which have become more constrained in recent years. There is little point in materials being separately collected by local councils if there are insufficient end markets in place.
- The introduction of food waste collections by local councils would need to be subject to the availability of sufficient food waste treatment capacity in the area.
- The use of food waste caddy liners should be promoted, as these have been shown to increase yields. Additional funding from government would be needed if councils were to provide these to residents on a free of charge basis.
- At the present time, biodegradable and compostable packaging should not be considered for kerbside collection as these materials often cannot be recycled by the treatment facilities and can end up contaminating other recyclable materials such as card.
- The RSN's view on free garden waste collections is similar to that of the wider local government community: public funds would be better spent elsewhere. One of our members from Gloucestershire has commented "Gloucestershire collection authorities have charged for garden waste services. In 2019, our four- season waste compositional analysis showed that only 3% of kerbside residual waste was made up of garden waste. Separate collection of this for composting would add only 1% to the overall county recycling/composting rate (assuming full capture of the 3% garden waste within our residual waste). This is somewhat short of Government's wider modelling, which predicts a 5% increase to recycling rates. With regards to the alternative proposal to free garden waste collections: providing guidance on reasonable garden waste charges (quoted as £18-£30/annum), GRWP notes that this is beneath the annual value charged by Gloucestershire councils and is significantly beneath the average charge of £43/year for councils in England. This would represent a loss of income and a new burden for councils, for which government funding would be required".