

Consultation: Consistency in Household and Business Recycling in England

Which? is the UK's consumer champion. As an organisation we're not for profit - a powerful force for good, here to make life simpler, fairer and safer for everyone. We're the independent consumer voice that provides impartial advice, investigates, holds businesses to account and works with policymakers to make change happen. We fund our work mainly through member subscriptions, we're not influenced by third parties and we buy all the products that we test.

Summary

Which? welcomes the opportunity to respond to this consultation on Consistency in Household and Business Recycling in England. We have been calling for action to make it easier for consumers to do the right thing by recycling and welcome many of the Government's proposals.

- We support the Government's proposals to increase consistency in the materials collected for household recycling. The inconsistency in recycling schemes across the country and even within regions was identified as a significant barrier to higher recycling rates in our 2019 investigation¹.
- In order for consistent recycling schemes to be successful, communication of recycling information for consumers must also be improved.
- We strongly support the Government's intention to introduce consistent food waste collections across England. The need for this has been highlighted by Which? investigations².
- We also support the Government's proposal that food waste should be collected separately from other waste. Research shows that participation rates tend to be higher for separate collections than for mixed collections. At the same time, the Government must also focus on how to support households in reducing the amount of food that is wasted from the outset.

¹ Which?, "Not yet recycled": The challenges of plastic recycling', print, August 2019

² Which?, 'It's time to wise up about food waste', print, July 2019



- We welcome Government action to increase rates of garden waste recycling, which should bring significant environmental benefits, and support proposals to introduce free minimum standard garden waste collections.

Introduction

Which? is committed to bringing sustainability into everything we do, including through our advocacy, product testing and investigations. We therefore welcome the opportunity to respond to this consultation on Consistency in Household and Business Recycling in England. Household recycling has been a focus of a number of our recent investigations, including how consumers can be better supported in reducing and recycling food waste, and the barriers to greater recycling by consumers.

We are responding to the following section of the consultation:

Part 1: Measures to improve the quantity and quality of household recycling.

We have limited our response to those areas where we have most expertise and data to contribute at this stage.

Relevant Consultation Questions

Q6. Do you agree or disagree that local authorities should be required to collect the following dry materials from all households, including flats, by the end of the financial year in which payments to local authorities under Extended Producer Responsibility for packaging commences (currently proposed to be 2023/4 subject to consultation)?

Aluminium foil

Aluminium food trays

Steel and aluminium aerosols

Aluminium tubes, e.g. tomato puree tubes

Metal jar lids

Food and drink cartons, e.g. tetrapak

We **agree** with the Government's proposals to increase consistency in the materials collected for recycling from households in England. Which? research has shown that recycling is important to consumers, as in a recent survey, 79% of Which? members told us that the recyclability of grocery packaging was important to them³. It is also a regular part of

³ Which?, [Not yet recycled: the grocery brands with a packaging problem](#), online, September 2020



consumers' lives, as in a 2021 Which? survey, 93% of respondents told us that they regularly recycle household waste⁴.

We do not have the evidence to be able to comment on the Government's proposed timeframes for the implementation of this policy.

The introduction of consistent recycling schemes across England is an important opportunity to address the current confusion around recycling. In May 2019, 31% of the 1,987 people who recycle that we spoke to told us they weren't confident that they were disposing of their recyclable packaging correctly⁵.

The inconsistency in recycling schemes across the country and even within regions was identified as a significant barrier to higher recycling rates in our May 2019 investigation⁶. Measures to increase consistency have the potential to significantly increase rates of consumer understanding and participation in recycling schemes.

In order for this to be successful, communication around recycling must also be improved. Which? research has found that this is currently a significant issue, with 27% of respondents to our survey rating communication around recycling from their authority as 'poor'⁷.

Collection of plastic films from households:

Q11. Do you agree or disagree that local authorities should adopt the collection of this material from all households, including flats, no later than 2026/27?

We **agree**. Which? welcomes the Government's intention to make recycling plastic film easier for consumers, and we have responded separately to the consultation on Extended Producer Responsibility for Packaging (attached).

Our investigation into supermarket own-label groceries in 2018 found that between 4% and 10% of the packaging we looked at was plastic film that could only be recycled at supermarket collection points or 'bring banks' rather than at the kerbside, but that fewer than one in ten shoppers (9%) always or often took packaging back to a supermarket to be recycled⁸.

Q14. Which parts of Proposal 4 do you agree or disagree with?

⁴ Which? survey, 30 April - 2 May 2021, sample size 3619, data weighted to be representative of each devolved UK nation by population age, gender and social grade (age 18+), and then reweighted by region.

⁵ Which?, "'Not yet recycled": The challenges of plastic recycling', print, August 2019.

⁶ Which?, "'Not yet recycled": The challenges of plastic recycling', print, August 2019

⁷ Which?, "'Not yet recycled": The challenges of plastic recycling', print, August 2019

⁸ Which?, 'How to use less plastic and help save the planet', print, August 2018

- **Local authorities already collecting food waste separately must continue to collect this material for recycling at least weekly from the 2023/24 financial year**
- **Local authorities should have a separate food waste collection service (at least weekly) in place for all household properties including flats as quickly as contracts allow**
- **Local authorities without existing contracts in place that would be affected by introducing a separate food waste collection service should have a separate food waste collection service in place (at least weekly), for all households including flats, by the 2024/25 financial year at the latest**
- **Local authorities with long term existing mixed food/garden waste collection or disposal contracts in place should have a separate food waste collection service in place (at least weekly) for all household properties including flats as soon as contracts allow, with an end date to meet this requirement between 2024/25 and 2030/31**
- **Local authorities with long term residual waste disposal contracts affected by introducing a separate food waste collection service (e.g. some Energy from Waste or Mechanical Biological Treatment contracts) should introduce a separate food waste collection service (at least weekly) to all households including flats as soon as contracts allow, with an end date to meet this requirement to be set between 2024/25 and 2030/31**

We **agree** in principle with all parts of Proposal 4, although we do not have the evidence to be able to comment on proposals for specific timelines.

We strongly support the Government's intention to introduce separate food waste collections at least weekly for all households across England. Which? research has found significant support amongst UK consumers, as 39% of respondents to our recent survey felt that the Government could help them reduce the environmental impact of their food choices by providing better access to food waste collections and composting⁹.

The need for a consistent recycling service across England was highlighted by our investigation into food waste in July 2019¹⁰. Our analysis identified significant inconsistency in

⁹ Which? survey, 30 April - 2 May 2021, sample size 3619, data weighted to be representative of each devolved UK nation by population age, gender and social grade (age 18+), and then reweighted by region.

¹⁰ Which?, 'It's time to wise up about food waste', print, July 2019

food waste collection services across England¹¹, and we believe that a consistent food waste collection service should help to improve the amount of food waste that is recycled. At the same time, the Government must also focus on how to support households in reducing the amount of food that is wasted from the outset.

We know that reducing food waste is important to UK consumers. A recent Which? survey found that while consumers are largely unaware of the extent to which their food choices can negatively impact the environment, a fifth of consumers identified food waste as one of the biggest negative impacts¹². And they are already taking action - 50% of UK adults we surveyed told us that they regularly plan their meals to cut down on food waste, while 30% regularly compost leftover food or use a food recycling service to reduce waste¹³.

We also found that the COVID-19 pandemic has meant that 37% of consumers now feel that reducing food waste is more of a priority for them¹⁴. This suggests that there could be a significant opportunity to engage consumers in the need to act on food waste in the current moment, provided that they are supported by businesses and by the Government.

A consistent food waste collection service across England is essential to providing consumers with the services they need in order to be able to recycle more food waste. As of 2019, only around half of councils in England offered this service, and even when it was provided, it was not always offered to every household in the council area. This meant that fewer than half of homes in England had access to food waste collections, and there were significant regional variations - for example, no councils in the North East offered the service, while 81% of councils in the South West did¹⁵.

It will also be important for the Government to consider how to address the varying participation rates in the food waste collections which are provided. In Hackney, London, for example, data from 2019 shows that participation rates varied from 18% in some streets to 47% in others, and several English councils had ceased food waste collections altogether because of low participation rates. Luton, for instance, stopped its food waste collections in 2013 because the 19,000 tonnes of food it collected each year couldn't justify the service's

¹¹ Which?, 'It's time to wise up about food waste', print, July 2019

¹² Which? survey, 30 April - 2 May 2021, sample size 3619, data weighted to be representative of each devolved UK nation by population age, gender and social grade (age 18+), and then reweighted by region.

¹³ Which? survey, 30 April - 2 May 2021, sample size 3619, data weighted to be representative of each devolved UK nation by population age, gender and social grade (age 18+), and then reweighted by region.

¹⁴ Which? survey, 30 April - 2 May 2021, sample size 3619, data weighted to be representative of each devolved UK nation by population age, gender and social grade (age 18+), and then reweighted by region.

¹⁵ Which?, 'It's time to wise up about food waste', print, July 2019.

£3.1 million running costs. And London's Barnet council stopped its food waste collections in November 2018, as only 17% of households were participating¹⁶.

We support the Government's proposal that food waste should be collected separately from other waste. Research by the Waste and Resources Action Programme, WRAP, shows that participation rates for separate food waste collections are around three times higher than for mixed collections¹⁷.

We also support the Government's proposal that food waste should be collected at least weekly. When Which? surveyed 2,101 adults in Great Britain about their food waste habits, the main reasons that people gave for not wanting to recycle food waste were: 'bad odours' (35%), 'leads to pests' (30%) and 'it's unhygienic' (24%)¹⁸. The introduction of minimum, separate weekly collections has the potential to significantly address these barriers.

There may also be a role for greater consumer information to make sure that people are aware of what they can do to minimise issues such as odours and pests which currently act as a barrier to greater food recycling. For example, Which? has provided simple advice to consumers including keeping food covered when preparing meals, using compostable bags to store food waste, and securely tying bags and keeping bin lids securely closed in order to avoid pests¹⁹. We have also advised that odours can be minimised by cooling food before putting it in a caddy or bin, storing bins out of direct sunlight, lining the caddy with newspaper to soak up liquids, and cleaning bins regularly²⁰.

The impact of this policy should also be monitored to identify whether barriers remain for consumers which have not been addressed by the introduction of separate weekly collections.

Finally, it is important to recognise that ultimately, the best option is to not waste food at all. Preventing food waste can save more than fifty-three times more carbon emissions than recycling the same leftovers²¹. And while some food waste is an inevitable side effect of food preparation, of the 7.1 million tonnes of food waste produced in UK households, 5 million tonnes is edible and avoidable²². As such, the Government must ensure that alongside encouraging greater rates of food waste recycling, consumers are given the right support to reduce the avoidable food waste currently produced by households.

¹⁶ Which?, 'It's time to wise up about food waste', print, July 2019.

¹⁷ Research by the Waste and Resources Action Programme (WRAP), cited in Which?, 'It's time to wise up about food waste', print, July 2019.

¹⁸ Which?, 'It's time to wise up about food waste', print, July 2019.

¹⁹ Which?, 'It's time to wise up about food waste', print, July 2019.

²⁰ Which?, 'It's time to wise up about food waste', print, July 2019.

²¹ Which?, 'It's time to wise up about food waste', print, July 2019.

²² Which?, 'It's time to wise up about food waste', print, July 2019.

Which? welcomes the Government's broader commitment to tackle food waste, and we have responded separately to the consultation on the Waste Prevention Programme for England (attached). While we agree that progress has been made, an ambitious approach is still needed to influence business behaviour, as well as to support consumers to reduce the amount of food they waste, while also ensuring food safety.

Q17. Do you have any comments on how the collection and disposal of compostable and biodegradable materials should be treated under recycling consistency reforms? For example, this could include examples of what should be provided in guidance on the collection and disposal of these materials.

In 2019, after conducting research and testing, Which? switched our magazine packaging from plastic to a compostable and fully biodegradable potato-based starch wrapper²³. We are currently carrying out an investigation to determine how readily this new packaging composts. We will be happy to share the eventual results with the Government, which we expect will be possible in around 18 months.

Q19. Do you agree or disagree with the materials included in and excluded from this description of garden waste? If you disagree, please provide the reason for your response and specify which materials should be included or excluded in this definition.

We propose that the following should be included in the description of garden waste included in regulations.

Unwanted organic material arising from a garden, including:

- Grass cuttings
- Garden weeds
- Plants and flowers
- Hedge Clippings
- Leaves
- Twigs and small branches

This excludes:

- Waste products of animal origin
- Bulky waste (including but not limited to garden furniture and fencing)
- Plant pots
- Garden tools or other gardening equipment
- Soil, stone, gravel or bricks

²³ Which?, [Which? Magazine switches to a potato-starch wrapper](#), online, May 2019

We **disagree**. We welcome Government action to increase rates of collection of garden waste for composting or recycling, and we agree with the list of materials that should be included in the description of garden waste. However, based on our own composting technique trials and knowledge from our specialist magazine, *Which? Gardening*, of good horticultural practice, we believe that this should also include pond weed and larger branches.

We also recommend that rootballs should be explicitly excluded from the description of garden waste. Rootballs are not currently collected by most councils as they cannot be chipped - they require significant work to reduce to a size where they could be chipped, and they usually hold both wood and soil and can therefore blunt chipper blades. As such, we don't believe these need to be collected as garden waste.

Q20. Given the above costs, recycling benefits and carbon emissions reductions, do you agree or disagree that local authorities should be required to introduce a free minimum standard garden waste collection (240 litre containers, fortnightly collection frequency and throughout the growing season), if this is fully funded by Government, and if authorities remain free to charge for more frequent collections and/or additional capacity?

We **agree**.

We support the Government's intention to increase recycling of garden waste which has the potential to bring significant environmental benefits. Garden waste is a key component in useful garden materials such as soil conditioners, and also has the potential to become a major ingredient in peat-free composts again, provided problems with variability and nutrient imbalances can be overcome²⁴. This could help in the switch to a peat-free future for horticulture.

It is reasonable to assume that people will be more likely to recycle their garden waste if they are not required to pay for collections. This is supported by anecdotal research from the Waste and Resources Action Programme, WRAP, which showed that introducing charges for gardening waste collections can lead to fewer people recycling green waste²⁵.

The Government should consider how to manage the distributional impacts of this policy which could result in people without gardens supporting a service for those with gardens. For

²⁴ *Which? Gardening on Test*, print, January/February 2018. Our investigation found that one compost that was predominantly made from green waste, Lidl Peat Free Compost, showed huge variation in nutrient levels. See also *Which?, In the Know: Peat-free Compost*, print, April 2021: "Once the most common ingredient in peat-free compost, [green compost is] now used more sparingly due to problems with nutrient content [...]"

²⁵ WRAP, cited in *Which?*, "What's going on with your recycling?", print, June 2017: "Introducing charges can lead to fewer people recycling green waste, Wrap's anecdotal research found".



example, this could include making sure that the environmental benefits are clearly communicated to all local residents.

Finally, Which? research has also shown that there are a number of common mistakes that people make when recycling green waste. In a March 2017 survey, we found that 13% had wrongly put a plastic bag in with their green waste, 14% had included soil, and 4% had included stones and plastic items²⁶. The Government should make sure that consumers are well informed about what can and can't be disposed of when introducing any new garden waste collection.

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²⁶ Which? online survey of 918 members of the UK public who have disposed of green waste, March 2017, cited in Which?, "What's going on with your recycling?", print, June 2017