

## BRIEFING NOTE ON CHANGES TO THE RECYCLING RATE

### 1. Summary

- 1.1 In May 2012 Street Arisings materials which were previously considered as recycling materials were redefined by government legislation and as a consequence classified as landfill. This adversely affects the City Council's position regarding its recycling rate.

### 2. Introduction

#### Definition of Street Sweepings

- 2.1 Street Sweepings are the arisings collected by our automated mechanical sweeping vehicles during the process of Street Cleansing which includes leaves, grass cuttings, weeds, litter, road dressings, grit, detritus etc.
- 2.2 In the past the City Council's street sweepings have been used as a top fluff layer i.e. the metre of material underneath the clay cap of a landfill cell and thus has been included in our recycling material and have contributed to the recycling rate.
- 2.3 Oxford City Council was able to claim the tonnages of the treated waste as recycled for the purposes of Waste Data Flow contributing to our recycling target.

#### Change in Legislation

- 2.4 HMRC issued Briefing Note 15/12 on 18 May 2012 in relation to the types of materials that could be defined as Landfill Fluff Layer (which describes material used for basal landfill engineering to protect the integrity of the lining system). This change adversely affects the City Council's position as the arisings are no longer considered as recycling material. This has therefore had a significant effect on our overall recycling percentage. The effect is also "double edged" as the tonnage involved is now considered as landfill and as such it acts against the recycling calculation and also incurs greater costs, for which the Council has made provision in base budget from 2013/14.
- 2.5 During the same period, the Environment Agency issued Guidance for Recovery of Street Sweepings and Gully Emptyings on 1 May 2012, stating that these arisings are no longer acceptable for composting or Anaerobic Digestion and therefore these arisings will now need to be sent to landfill or placed into an incinerator.

- 2.6 These legislative and guidance changes affect all other local authorities including the local District Councils in the Oxfordshire Waste Partnership (OWP). In summary their street sweeping arisings will no longer count towards their recycling rates and their Oxfordshire Waste Partnership Financial Arrangement (OWP FA).
- 2.7 However, the effect on the City Council's recycling rate is much more pronounced than for our rural neighbours due to our high frequency street cleansing regimes that depend on mechanical sweeping to maintain the desired standard of cleanliness of our local streets, pavements and hard surfaces in an urban environment.

### **3 Current Position and Impact on Oxford City Council's Recycling Rate**

- 3.1 At present all of the City Council's street sweepings are collected and taken to landfill.
- 3.2 We therefore anticipate that the impact on the City Council's recycling rate over the full year will be a reduction in the region of 6%, (2.5% from April to September and 3.5% from October to March due to the autumn leaf fall).

### **4 Mitigation Actions Investigated**

- 4.1 We have worked closely with our OWP partners, specifically with Oxfordshire County Council and our contractors to attempt to mitigate the effect of the recycling rate reduction on Oxford City as follows:-
- Worked alongside the County Council and EA to carry out testing on our street arisings to explore if they were suitable for composting during the leaf fall season. This is an on-going process and while our results are within the permitted levels set by the EA, they have not provided us with a definitive answer as to whether they would be accepted and therefore, as yet, they have not been counted.
  - We have carried out our own extensive trials on our arisings to see if we could use the litter based material as dry recycle. This was not considered to be a viable option due to the inconsistency in the materials that could be recycled, both from a quality and quantity perspective.

### **5 Possible Future Mitigation**

- 5.1 We continue to work with OWP regarding the future of street arisings to reduce the amount that enters landfill, and are currently doing the following:-
- Pilot scheme to send arisings to new technology in Warwickshire that washes the arisings to recover suitable materials which are then recycled for other uses, for example in the pipe laying industry. Officers from Oxford City, the County and our current contractor have visited a site in Essex in July which is already up and running.

- We are working with the County Council and EA to adapt a bund at the Marsh Road Depot to allow a dewatering action to be undertaken, which will reduce the weight of arisings that would then go to landfill. A cost benefit analysis will be undertaken in due course, once approval has been granted from the EA.
- To continue our work lobbying the EA to accept sweeper arisings leaf fall as a suitable compostable material.

## **6 Impact on Performance Indicators**

- 6.1 Up until now we have had a strong focus to achieve the psychologically important 50% recycling rate. This was a huge challenge for Oxford and, national performance data shows that this target is rarely achieved by urban district councils. Due to challenges to the EA and HMRC in the first 6 months of 2012/13, the custom and practice arrangements for quantifying allowable recycling rates continued. This arrangement closed on 30 September 2012 and therefore the Council's final indicator for 2012/13 was adversely affected by 3.5% (see paragraph 3). Without this, our final outturn was 44.58%. On a like for like comparison with 2011/12, the 2012/13 result was 48.08% (44.58% + 3.5%), an improvement of 3.2% from the 2011/12 result of 44.88. This is a particularly good improvement given the significant reduction of garden waste collected in the final quarter of 2012/13 due to the exceptionally prolonged period of bad weather (extreme cold and heavy rain) which prevented gardening. Oxfordshire County Council estimates that garden waste recycling reduced by up to 30% in this quarter which would have had an adverse effect of at least 1% on the Council's annual recycling rate. Therefore as a true like for like comparison, without these factors, the 2012/13 improvement would have taken the Council's recycling rate for the year very close to 50%. A significant part of the 2012/13 improvement was the result of the Council's investment in introducing recycling arrangements for Council owned flats.
- 6.2 Realistically with these changes to the definitions of recycle, achieving a 50% recycling rate is no longer possible in the near future, and it's difficult to see how we could achieve it economically even in the longer term. Based on the evidence so far this year, future predictions put this to be in the region of 44%.
- 6.3 This provides us with the opportunity to refocus our efforts on the arguably more important figure which is the amount of waste that goes to landfill. We have been hugely successful in reducing this in recent years and in many respects it is a better measure of the Council's success at recycling and waste stream management. For the current year we will endeavour to contain the weight per household within last years' target levels. Nevertheless, it remains a recommendation that in future this should be the key indicator used by the Council to measure waste management performance. The 2012/13 and 2013/14 target is 445kg per household.

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