

Appendix 10 – Hertfordshire County Council Comments

General Observations

Whilst you rightly make reference to the national Resources and Waste Strategy (R&WS) in your email, it occurs to me that additional support for the recommendations and/or consideration of risk for their implementation could be made by reference to potential legislative and policy changes that are proposed through consultation and/or on the horizon but that sit outside of the R&WS and which therefore, may also be influencing factors in your decision making. To highlight a few areas:-

- The future management of Persistent Organic Pollutants (POPs) – LAs and service providers will have had recent notification of the Environment Agency's enforcement position in regard to the management of POPs in the waste stream. Specifically, for Waste Collection Authorities (WCAs), consideration on how best to collect domestic soft furnishing items from resident's homes and/or from fly-tipping incidents would seemingly form a part of the costing of proposals and likely discussed during the tender process, acknowledgement of the risks would seem prudent at this stage.
- The potential inclusion of Energy from Waste (EfW) in the Emissions Trading Scheme – From a strategic and holistic point of view, your proposed reduction in residual waste receptacle size and 3 weekly residual collection would support aims on waste reduction and efforts to protect the 'taxpayer's purse' in future years.
- The Environment Act's proposed long-term waste reduction target – Noting industry thinking that there is likely to be a significant gap between the target and what is capable of delivery through R&WS implementation, again, your proposed

reduced receptacle size and 3 weekly residual waste collection would support progress towards this long-term aim.

- Net zero/decarbonisation agenda – How we best track and monitor holistic carbon impact of WCA and Waste Disposal Authority (WDA) is a matter being considered by officers of the HWP and I would think that your proposed recommendations would support an improved carbon reduction position for Hertfordshire, for example, waste minimisation and food waste to Anaerobic Digestion.

Whilst R&WS implementation has a continued lack of clarity, there are a range of financial considerations that may affect decision making at a local level:

- Lack of specific information concerning “new net burdens” under the R&WS Consistency agenda.
- How “necessary costs” arising through Extended Producer Responsibility (EPR) funding for Packaging Wastes will be identified and ultimately how much will be received, and when, by any Local Authority.
- Should EPR deliver funding, then what is the potential for cessation of Recycling Credits and how have this and other existing tiered statutory and non-statutory funding arrangements throughout Hertfordshire been considered as part of the financial assumptions in the scope of costing the proposed changes.
- Impact of a Deposit Return Scheme.

From a WDA perspective, consultation on contract length may inform process and there are a range of local parameters that need to be considered including, use of the new Eastern Transfer Station, organic

waste contract end dates and future services for separate green garden and food waste. My officers would be able to support on planned timing of procurements and award.

Recommendations for Executive (from your email):

- That the customer services and call handling function be provided by the local authority.

Whilst a matter for your own Authority, I would suggest that it would be best to maintain flexibility with reference to the outcome of the planned HWP Waste Study.

- That a new weekly separate food waste collection service in 23l caddys for houses and in wheeled bins for flats in East Hertfordshire be introduced from 2025.

The County Council is supportive of the introduction of separate food waste services.

- That residual waste collections occur on a three weekly collection cycle from 2025.

Whilst frequency of collection of all waste types remains a local decision, the County Council is supportive of service changes seeking to minimise waste. Appropriate communication with officers at the County Council is required as WDA contracted services are subject to their own terms and conditions e.g. guaranteed minimum tonnage and communication would help to mitigate any unforeseen consequences.

- That the standard receptacle for residual waste be 180l in size and that all new and replacement residual waste containers for houses will be 180l as soon as is reasonably practicable.

The County Council is supportive of service changes seeking to minimise waste with comments above concerning financial business case assumptions applying.

- That a standard bin colour set across East and North Hertfordshire is introduced and that colours are transitioned over time.

Whilst a matter for your own Authority, I would suggest that it would be best to maintain flexibility with reference to the outcome of the planned HWP Waste Study.

- That plastic film be included in the mixed dry recycling collections from 2025.

The County Council is supportive of efforts to move waste up the hierarchy with comments above concerning financial business case assumptions e.g. Recycling Credit future applying.

- That bring bank services for paper and textiles are removed during 2023/24.

Whilst the County Council doesn't have a strong view on the cessation of these local services, a view from partners in any HWP consortia and reference to the outcomes of the HWP Waste Study should be considered.

- That Parish litter picking grants cease and for street litter bins currently maintained under this scheme to be serviced under the waste and recycling contract from 1st April 2023.

The County Council would make no comment.

- That the garden waste collection charge is aligned with NHC from 2025.

Whilst this is not a matter for the County Council to comment on, clarity on the Consistency agenda of the R&WS may impact on any decision to charge for green garden waste. Outcomes of the HWP Waste Study should be considered.

- Collection of fibre separately (should it be mandated by the Government).

The County Council would make no comment.

Thank you again for the opportunity to comment on your draft proposals and I'm also happy to extend an offer of support from County Council and HWP officers in the ongoing process.