

Agenda



Purpose:

Considerations to ensure collection of glass, paper, plastics and metals from NWBC is in accordance with the Waste Framework Directive Necessity and Practicability Tests

Items:

1. Background to Necessity and Practicability (TEEP) tests
2. Interim Findings & Next Steps
3. Questions

Background



- Regulation introduced in the EU Waste Framework Directive, and compulsory from 1st January 2015

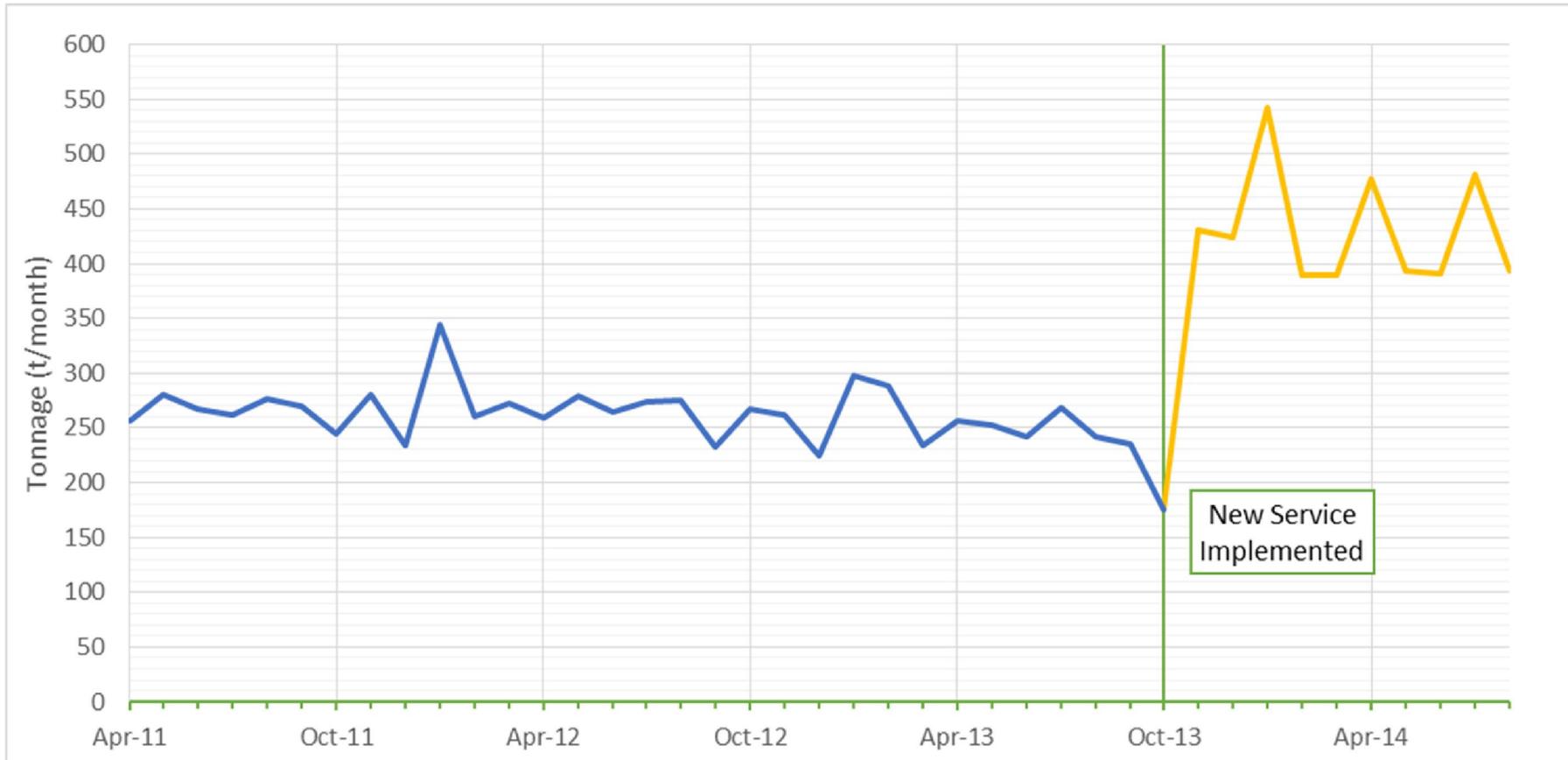
‘Member States shall take measures to promote high quality recycling and, to this end, shall set up separate collections of waste where technically, environmentally and economically practicable and appropriate to meet the necessary quality standards for the relevant recycling sectors’

Background (2)



- Two key components:
 - Necessity
 - Practicability (not always required)
- No formal guidance from Defra; WRAP have provided a non-statutory 'route map', EA document & other contributions
- EA expect route map to be 'rigorously applied'
- Courts will ultimately decide, after (if) authorities are challenged by 3rd parties or regulator
- Importance of local issues

The New Recycling Scheme performs well!



Frith Resource Management Ltd

Web: www.frithrm.com Email: paul@frithrm.com Call: 07817 853572

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Is Change Necessary?

- Necessity test
- In North Warwickshire the collection of three of the four streams does not present a problem (paper, cans & plastics)
- Glass is the exception

PROPOSED RISK-BASED REGULATORY REGIME (UNDER CONSULTATION)

HIGH LEVEL OF COMPLIANCE:

- Collections providing on-site or doorstep separate collection or kerbside sorting, of each paper, glass, plastic and cans. Plastic and cans could be collected together.
- Collectors which have rigorously applied the Waste Regulations Route Map and collection arrangements are based on well-evidenced, documented and justified decision-making.

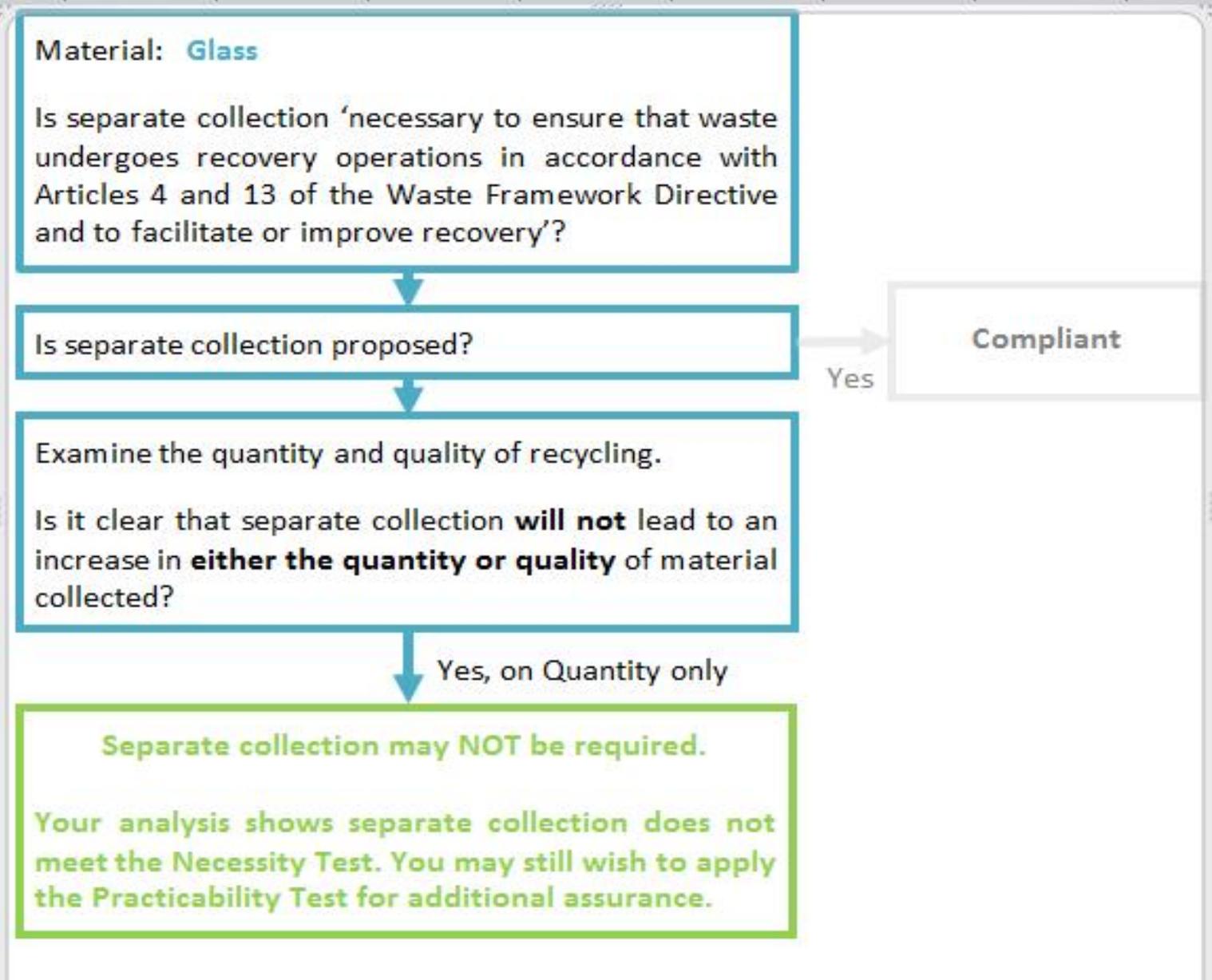
MEDIUM (POSSIBLY FAILING THE NECESSITY OR TEEP TEST)

- Collectors which send commingled collections to a MRF which is providing poor quality recyclates.
- Collections where evidence suggests poor quality for recycling and are not separately collecting.
- A collector advertising a new contract that is prescriptive about type of collection/sorting service unless it is clear it wants a multi-stream/separate collection.
- A collection which has moved away from separate collection to commingling since 2012.
- Collections which are not collecting any of at least one of the four streams - paper, metal, plastic, glass - other than through civic amenity sites or bring banks.

LOW LEVEL OF COMPLIANCE

- Any implication that waste has ended up as an illegal export.
- Clear evidence that good quality recycle collections deliberately sent for disposal of incineration or remixed with other waste.

Necessity Test on Glass



Next Steps



- Seek further information on glass quality (re-melt vs aggregate)

TEEP Test (Practicability)

- To demonstrate that separate collection is not practicable
- Technically, Environmentally, Economically Practicable (TEEP)
- Public opinion is not a consideration
- Service costs / Operational costs / recycling income / fees
- Not transitional costs, although this can impact on timing
- Test at least two separate collection options
- Fortnightly / Monthly separate glass collection or full kerbside sort

Questions



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Some definitions of TEEP terms



“Technically practicable means that the separate collection may be implemented through a system which has been technically developed and proven to function in practice.”

“Environmentally practicable should be understood such that the added value of ecological benefits justify possible negative environmental effects of the separate collection (e.g. additional emissions from transport).”

“Economically practicable refers to a separate collection which does not cause excessive costs in comparison with the treatment of a non-separated waste stream, considering the added value of recovery and recycling and the principle of proportionality.”