



20 April 2020

CIWM position on the draft guidance on HWRCs

Important role of HWRCs

CIWM acknowledges the vital service HWRCs provide in managing a significant tonnage of household waste, providing important sources of feedstock recycling and, in the case of those offering C&I waste services, helping to reduce the risk of fly-tipping.

With regard to household waste, evidence suggest that substantial volumes of waste could potentially be backing up during the period of lockdown. In 2018, around 4.2 million tonnes of waste was estimated to be received and handled annually through HWRCs (Tolvik Consulting Briefing: COVID-19 and UK waste sector) so in the current six week lockdown period there could be circa 500,000 tonnes of waste being stored within UK households. This demonstrates that careful planning for a phased return of this capability is essential before lockdown restrictions start to be relaxed.

There is growing evidence of the effect that the widespread closure of HWRCs is having on parts of the UK's reprocessing capacity, with the lack of feedstock impacting most notably on wood and WEEE recyclers and composting facilities. Anecdotal evidence also suggests that fly-tipping is also on the increase, although the variability in the figures means that it is currently difficult to establish an accurate picture. It is important, therefore, that interim options are explored – both in terms of provision and communications – that could reduce the upstream impact of HWRC closures on the recycling supply chain and reduce the risk of fly-tipping.

What is needed from the Government?

Discussion with CIWM members and key stakeholders across the sector indicate that what is needed from UK governments is a clear guidance framework, developed in conjunction with local authorities, that:

- supports the phased return (when time is right) of HWRC provision in line with the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020
- outlines a range of interim solutions that could be deployed to manage the wastes (and feedstocks) that are backing up
- identifies and takes steps to resolve key issues related to the operation of HWRCs in the context of ongoing constraints likely to be placed on this type of provision in the short to medium term i.e. additional Health & Safety risks, resourcing and cost, etc.

CIWM welcomes the work that Defra has initiated to draw up guidance on the operation of HWRCs during the Covid-19 pandemic. However, the draft document that has been issued for consultation is ambiguous and, in its current form does not adequately address the key needs set out above for the following reasons.

1. Clear interpretation of the law: It does not present a sufficiently robust case to confirm that travelling to an HWRC is allowable under the current 'essential travel' restrictions or status of HWRCs as an 'essential' service. Various interpretations put forward by different parties across the sector clearly demonstrate that more clarity is needed and detail on under what specific circumstances a visit to an HWRC could be deemed to be allowable.
2. Clear and consistent approach: It places the responsibility on individual local authorities to decide on a course of action and does not provide an adequate framework to support decision making and inform a consistent national approach, either by local authorities or by police forces tasked with policing the essential travel requirements or supporting HWRCs in the event of traffic disruption. This could lead to significant and damaging differences in interpretation.
3. It should place more emphasis on delivering effective kerbside residual, recycling, food and other collections as the primary solution during the current lockdown and provide a guide to decision-making and prioritisation i.e. should the first step be to consider how suspended garden /bulky waste collections could re-introduced to capture waste that would otherwise be sent to HWRCs while allowing residents to follow the advice to 'stay at home'. The guidance should also encourage strategic planning between authorities to maintain collections and minimise the need for additional HWRC capacity, and provide clear advice on how spare capacity elsewhere in the sector might be effectively utilised.
4. It does not take into account the full economic cost of re-opening HWRCs in a manner that ensures effective social distancing and meets general safety requirements related to the operation of the site and addition controls on vehicular movements. These costs include:
 - staff resources to fully zone, cordon off, signpost and operate the site – resources which have in many cases been redeployed to support kerbside collections
 - dedicated householder communications
 - additional PPE and cleaning equipment

This is particularly important in the context of recent warnings given about the mounting pressures on local authority budgets across a range of public services as a result of the COVID-19 pandemic.

5. There should be either be a nationally co-ordinated set of consumer-facing messages, or additional guidance and support for local authorities to roll out and build on the new suite of communication materials already developed by WRAP, to ensure a consistent set of messages are given to the public on:
 - minimising the production of unnecessary waste during the lockdown period;

- the safe handling and storage of wastes that are being generated;
- in what circumstances action to dispose of this waste through HWRCs or other measures such as the hire of private skips is appropriate, and a reminder about householder's Duty of Care to ensure they use legitimate operators.

Conclusion

As stated at the beginning, CIWM welcomes the first stage of work undertaken by Defra to address this complex area. The Institution stands ready to assist in the further development of guidance and strategic planning to ensure that the phased return of HWRC provision can be delivered while protecting the health of the public and waste operatives, and ensuring that public resources are directed where they can be most effective in managing waste safely during the COVID-19 pandemic.

More detailed and anonymised feedback is provided in the separate Annex A, submitted with this headline CIWM position.