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City of BRADFORD METROPOLITAN DISTRICT COUNCIL

# Agenda for a meeting of the Regeneration and Environment Overview and Scrutiny Committee to be held on Tuesday, 19 March 2024 at 5.00 pm in Committee Room 1 - City Hall, Bradford

**Members of the Committee – Councillors**

| LABOUR | CONSERVATIVE | GREEN | LIBERAL DEMOCRAT | BRADFORD INDEPENDENT |
|---|---|---|---|---|
| K Hussain<br>Rowe<br>Wheatley<br>Mitchell<br>Steele | Herd | Watson | R Ahmed | Salam |

**Alternates:**

| LABOUR | CONSERVATIVE | GREEN | LIBERAL DEMOCRAT | BRADFORD INDEPENDENT |
|---|---|---|---|---|
| Mohammed<br>Choudhry<br>Dodds<br>Kauser | Davies | Warnes | Griffiths | Nazir |

**Notes:**

- This agenda can be made available in Braille, large print or tape format on request by contacting the Agenda contact shown below.
- The taking of photographs, filming and sound recording of the meeting is allowed except if Councillors vote to exclude the public to discuss confidential matters covered by Schedule 12A of the Local Government Act 1972. **Recording activity should be respectful to the conduct of the meeting and behaviour that disrupts the meeting (such as oral commentary) will not be permitted. Anyone attending the meeting who wishes to record or film the meeting's proceedings is advised to liaise with the Agenda Contact who will provide guidance and ensure that any necessary arrangements are in place**. Those present who are invited to make spoken contributions to the meeting should be aware that they may be filmed or sound recorded.
- **Members of the public are respectfully reminded that this is a meeting that is being held in public NOT a public meeting. The attendance of the public to observe the proceedings is welcome.**
- If any further information is required about any item on this agenda, please contact the officer named at the foot of that agenda item.

**From:** **To:**

Jason Field
Interim Director of Legal and Governance
Agenda Contact: Su Booth/Louis Kingdom
Phone: 07814 073884/07890 416570
E-mail: susan.booth2@bradford.gov.uk/louis.kingdom@bradford.gov.uk

## A. PROCEDURAL ITEMS

### 1. ALTERNATE MEMBERS (Standing Order 34)

The Director of Legal and Governance will report the names of alternate Members who are attending the meeting in place of appointed Members.

### 2. DISCLOSURES OF INTEREST

Members Code of Conduct – Part 4A of the Constitution)

To receive disclosures of interests from members and co-opted members on matters to be considered at the meeting. The disclosure must include the nature of the interest.

An interest must also be disclosed in the meeting when it becomes apparent to the member during the meeting.

***Notes:***

*(1) Members must consider their interests, and act according to the following:*

| ***Type of Interest*** | ***You must:*** |
|---|---|
| *Disclosable Pecuniary Interests* | *Disclose the interest; not participate in the discussion or vote; and leave the meeting <u>unless</u> you have a dispensation.* |
| *Other Registrable Interests (Directly Related)* ***OR*** *Non-Registrable Interests (Directly Related)* | *Disclose the interest; speak on the item <u>only if</u> the public are also allowed to speak but otherwise not participate in the discussion or vote; and leave the meeting <u>unless</u> you have a dispensation.* |
| *Other Registrable Interests (Affects)* ***OR*** *Non-Registrable Interests (Affects)* | *Disclose the interest; remain in the meeting, participate and vote <u>unless</u> the matter affects the financial interest or well-being* |

*(a) to a greater extent than it affects the financial interests of a majority of inhabitants of the affected ward, and*

*(b) a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest; in which case speak on the item only if the public are also allowed to speak but otherwise not do not participate in the discussion or vote; and leave the meeting unless you have a dispensation.*

*(2) Disclosable pecuniary interests relate to the Member concerned or their spouse/partner.*

*(3) Members in arrears of Council Tax by more than two months must not vote in decisions on, or which might affect, budget calculations, and must disclose at the meeting that this restriction applies to them. A failure to comply with these requirements is a criminal offence under section 106 of the Local Government Finance Act 1992.*

*(4) Officers must disclose interests in accordance with Council Standing Order 44.*

## 3. MINUTES

**Recommended –**

**That the minutes of the meeting held on 13 February 2024 be signed as a correct record (previously circulated).**

(Su Booth / Louis Kingdom – 07814 073884 / 07890 416570)

## 4. REFERRALS TO THE OVERVIEW AND SCRUTINY COMMITTEE

Any referrals that have been made to this Committee up to and including the date of publication of this agenda will be reported at the meeting.

## 5. INSPECTION OF REPORTS AND BACKGROUND PAPERS

(Access to Information Procedure Rules – Part 3B of the Constitution)

Reports and background papers for agenda items may be inspected by contacting the person shown after each agenda item. Certain reports and background papers may be restricted.

Any request to remove the restriction on a report or background paper

should be made to the relevant Strategic Director or Assistant Director whose name is shown on the front page of the report.

If that request is refused, there is a right of appeal to this meeting.

Please contact the officer shown below in advance of the meeting if you wish to appeal.

(Su Booth / Louis Kingdom – 07814 073884 / 07890 416570)

## B. OVERVIEW AND SCRUTINY ACTIVITIES

**6. REPORT ON THE USE OF GLYPHOSATE FOR WEED CONTROL WITHIN BRADFORD METROPOLITAN DISTRICT COUNCIL** 1 - 26

The Strategic Director, Place will submit a report **(Document "AG")** which presents an update on progress with regards the reduced use of Glyphosate for weed control in the district and includes information on the trial involving no use (or exceptional use) in 3 parks in the Shipley ward. The report also includes work undertaken to identify areas of highest environmental sensitivity to avoid when spraying in the future and information from other Local Authorities on how they are dealing with the issue in their parks and adopted highway. It also provides options and recommendations to further reduce glyphosate across the district including clear, easy to read information signs for the public at sites where it is proposed to stop using the chemical.

**Recommended –**

**(1) That option 1 be approved and that clear signs are placed in all areas explaining what the council is doing.**

**(2) That officers continue to add areas of high sensitivity to be avoided in the use of glyphosate.**

**(3) That officers continue to liaise with other Local Authorities re best practice and experiences in the reduced use of glyphosate.**

(Damian Fisher – 01274 437146)

**7. FLY-TIPPING IN THE BRADFORD DISTRICT** 27 - 34

The Strategic Director, Place will submit a report **(Document "AH")** which provides an update on the work of the Environmental Enforcement Team in relation to fly tipping and other waste related crime.

**Recommended –**

**(1) That the contents of this report be noted.**

**(2) That a further update on activity be provided in 12 months' time.**

(Amjad Ishaq – 01274 433682)

**8. WASTE & FLEET SERVICES - PERFORMANCE AND CONTRACT REVIEW** 35 - 60

The Strategic Director, Place will submit a report **(Document "AI")** which provides a description of the service provision and all Waste related activities during 2023 and those planned for 2024, to improve the management of waste to more sustainable levels in line with the Waste Strategy (Municipal Waste Minimisation and Management Strategy 2015). The report also includes details on the performance of Fleet Services and the "Managed Stores" contract.

**Recommended –**

**(1) That Regeneration and Environment Overview & Scrutiny Committee consider the information presented in this report and request a further progress report in January 2025.**

**(2) That a site meeting/plant tour be arranged for the Regeneration and Environment Overview & Scrutiny Committee to visit AWM's waste processing plant at Leeds and also the Ferrybridge FM2 waste to energy plant.**

(Richard Galthen – 01274 431217)

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City of BRADFORD METROPOLITAN DISTRICT COUNCIL

# Report of the Director of Place to the meeting of Regeneration and Environment Overview and Scrutiny Committee to be held on 19th March 2024

**AG**

## Subject:

**Report on the use of Glyphosate for weed control within Bradford Metropolitan District Council.**

## Summary statement:

This report presents an update on progress with regards the reduced use of Glyphosate for weed control in the district and includes information on the trial involving no use (or exceptional use) in 3 parks in the Shipley ward. The report also includes work undertaken to identify areas of highest environmental sensitivity to avoid when spraying in the future and information from other Local Authorities on how they are dealing with the issue in their parks and adopted highway. It also provides options and recommendations to further reduce glyphosate across the district including clear, easy to read information signs for the public at sites where it is proposed to stop using the chemical.

**EQUALITY & DIVERSITY:**

With regards to glyphosates, the proposals included within this report will contribute to the Council's efforts to address the duty, in particular by providing equality of opportunity for people of all protected characteristics to experience and benefit from biodiversity. Particularly by increasing biodiversity in urban areas, where people with some protected characteristics including low-income, ethnicity, age and disability are more likely to live.

David Shepherd
Director of Place

Report Contact: Damian Fisher
Phone: (01274) 437146
E-mail: damian.fisher@bradford.gov.uk

**Portfolio: Healthy People and Places**

**Overview & Scrutiny Area: Regeneration and Environment**

## 1. SUMMARY

### 1.1 GLYPHOSATE UPDATE

This report presents an update on progress with regards the reduced use of Glyphosate for weed control in the district and includes information on the trial involving no use (or exceptional use) in 3 parks in the Shipley ward. The report also includes work undertaken to identify areas of highest environmental sensitivity to avoid when spraying in the future and information from other Local Authorities on how they are dealing with the issue in their parks and adopted highway. It also provides options and recommendations to further reduce glyphosate across the district including clear, easy to read information signs for the public at sites where it is proposed to stop using the chemical.

## 2. BACKGROUND

2.1 The report presented to this Committee on 31st January 2023 reported that the use of glyphosate is legally permitted until 15th December 2025 unless a decision is made to extend its use. Since then, on 29th November 2023 the European Commission published the 'Implementing Regulation' renewing the approval of glyphosate for a period of 10 years until 15th December 2033. It is likely that the UK will follow suit with this new extension, however this has not yet been agreed by the UK. This report assumes that the UK will follow suit with the either the new EU extension or some other extension agreed by the UK. In the unlikely event that an extension is not agreed and the ban is implemented on 15th December 2025 all Local Authorities in the UK will have to find an alternative method of dealing with weeds other than the use of Glyphosate.

The decision for the UK on glyphosate is important not only because of the potential health risk and environmental risks, but because it remains the last proven chemical spray on the market for use in municipal weed control that hasn't been banned.

More recently the House of Lords representative Lord Douglas Miller stated on the 23rd of February 2024 "Glyphosate is currently approved as an active substance for use in pesticide products in Great Britain. As part of its renewal assessment the Health and Safety Executive, as the Government's expert regulator for pesticides, will conduct a thorough and robust scientific risk assessment to determine if the approval of glyphosate should be renewed in line with assimilated Regulation 1107/2009 of the GB plant protection products legislation.

As part of this assessment HSE will consider all data required by the legislation and can request additional data from the approval holder should this be required before reaching its decision." It is unclear when this decision will be made.

2.2 The Recommendations from this Committee last year were.

(1) That, following consideration the solutions set out in Document “V”, that Solution 2: Reduced Use of Glyphosate, be recommended to the Executive for adoption. This would see a reduction in the use of glyphosate, primarily by avoiding those areas of the highest environmental sensitivity, whilst allowing for some form of weed control on the rest of the highway network.

(2) That it be further recommended to the Executive that public engagement and communication regarding the reduced use of glyphosate in some areas be undertaken and that Officers continue to engage with other Local Authorities that are also reducing the use of glyphosate.
(3) That an update report be presented to this Committee by the Strategic Director, Place, in 12 months’ that includes information on the trial involving no use (or exceptional use) of glyphosate within 2 parks within the Shipley ward that is planned for 2023 and learning from other Local Authority areas

**2.3 Update on the Shipley Trials - No use (or exceptional use) of glyphosate**

Shipley ward was chosen for the trial and it was decided to include 3 Parks.

- Northcliffe Park
- Shipley Park
- Crowgill Park

Instead of weed spraying the weeds were strimmed by Parks staff. The trial has gone very well with no complaints from the public and no damage to Parks infrastructure. Although strimming around obstacles takes slightly longer it has the added benefit of not having brown fading foliage for days and weeks after weed spraying improving the aesthetics in the area. Parks staff will continue to closely monitor closely any damage to infrastructure moving forward. An example of an information sign is shown in Appendix 2 at Northcliffe Park.

This year it is the intention to expand the non-use of glyphosate to all Parks and recreation grounds in the Shipley Constituency with easy-to-read signs explaining what we are doing and why. Signs could also provide information on why we are leaving some grassed areas to grow to increase biodiversity.

In the 4 remaining Constituencies, it is proposed to trial 2 or 3 Parks in each area and learn from the trials in Shipley, in particular the need for staff to understand the changes and specifically why the changes are important for the benefit of the environment. If successful, the next step would be to expand this practice to all parks and recreation grounds in the district by the spring of 2025.

**2.4 Highway Weed Spraying - Avoiding spraying areas of environmental sensitivity.**

Officers from the Biodiversity Team have been working to identify sensitive areas where the use of Glyphosate is to be avoided. This includes parks,

green spaces and adopted highway together with areas where there are water courses or places of high biodiversity.

Identification of sensitive sites to be omitted from glyphosate use have been identified using GIS mapping tools to find protected sites like the Special Protection Area and Special Area of Conservation on the moors and Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites. Other greenspaces have also been identified as sensitive locations such as woodlands and other open spaces. These locations are likely to support flowering plants which attract pollinators like bees and contain soils which support communities of diverse soil invertebrates including earthworms which are all susceptible to the damaging effects of glyphosate.

The current list should be expanded on based on officers identifying further sensitive locations supporting semi-natural and nectar rich habitats as well as other locations of value such as school grounds, playgrounds and sports pitches with landscaped elements.

In terms of the adopted highway (footways and channels) These are currently sprayed by a private contractor and the areas identified will be given to them in good time before spraying starts in April.

A full list of these sensitive sites is available and includes sites designated for nature conservation from Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites and the existing Wildlife Habitat Network. It includes ancient and younger woodland sites, including TPO woodlands, heathland and ecologically valuable grasslands and watercourses. The sites also include public parks and recreation grounds. The sites have been chosen because of their value for a range of invertebrates such as earthworms and bumble bees and of value for aquatic species. The list of sites is based on mapped data for the district and while it provides a functional basis for identifying sites close to which glyphosate use might be stopped, there may be other areas that should be added and some that would be appropriate to remove.

Whilst the mapped sites cover a substantial area of the district, they are generally focussed on rural areas, where glyphosate use is lower. However, the more urban sites are of particular importance due to their value to urban populations of invertebrates. Whilst there may be areas around these urban sites where there could be conflict between the weed growth permitted by the removal of glyphosate and local people’s desire to see weed-free footpaths their extent would be limited.

By ward the number of mapped features with sensitivity are presented in the table below. These are not absolute numbers of sites but include designated sites, sections of larger of sites and habitat features mapped, for example in the wildlife habitat network. There will be some duplicated features within these numbers also. The numbers should be viewed as relative to one another and along with the mapping. They illustrate broadly the higher quantity of sensitive sites or features in the more rural wards of the district.

| Ward | Number of mapped sensitive sites/ features |
|---|---|
| Baildon Ward | 933 |
| Bingley Rural Ward | 819 |
| Bingley Ward | 777 |
| Bolton and Undercliffe Ward | 123 |
| Bowling and Barkerend Ward | 143 |
| Bradford Moor | 59 |
| City Ward | 102 |
| Clayton and Fairweather Green Ward | 136 |
| Craven Ward | 766 |
| Eccleshill Ward | 123 |
| Great Horton Ward | 112 |
| Heaton Ward | 238 |
| Idle and Thackley Ward | 375 |
| Ilkley Ward | 1122 |
| Keighley Central Ward | 305 |
| Keighley East Ward | 645 |
| Keighley West Ward | 215 |
| Little Horton Ward | 47 |
| Manningham Ward | 103 |
| Queensbury Ward | 300 |
| Royds Ward | 119 |
| Shipley Ward | 339 |
| Thornton and Allerton Ward | 251 |
| Toller Ward | 167 |
| Tong Ward | 260 |
| Wharfedale Ward | 502 |
| Wibsey Ward | 62 |
| Windhill and Wrose Ward | 204 |
| Worth Valley Ward | 1455 |
| Wyke Ward | 208 |

Mapping of the above is presented in Appendix 4. Detailed mapping on specific wards can be provided on request.

## 2.5 Other Local Authority experience.

Responses from 70 local authorities with regards to benchmarking and enquiries to date have not established any clear success stories moving away from glyphosate. Many have carried out trials and reported either poor performance or excessive costs as barriers to permanent adoption of alternative treatments. Some authorities that stopped using glyphosate on the adopted highway have indicated that they have had to reintroduce the use of glyphosate to control the problem due to complaints. However, many have stopped the use in parks using strimming or manual treatment of grass edges/weeds and around obstructions.

The Parks and Cleansing service plans to make further contact with some of the responding local authorities that have introduced reduced-use policies, to

establish if there any practices that could be learnt and adopted.

A recent comparison of alternative treatment on **pavement** weed control was reported in 2022 by Cardiff Council. They trialled three different pavement weed control methods and focused on four key criteria:

- Cost
- Effects on the Environment
- Customer Satisfaction
- Quality

Methods trialled included:

- Glyphosate (applied 3 times a year)
- Hot Foam Herbicides (3 times a year)
- Acetic Acid Herbicides (4 times a year)

Theses alternative treatments have other environmental impacts due to the use of large amounts of gas / diesel for heating and the increased frequencies of treatment required to deliver a similar level of control, based on industry feedback on lower effectiveness levels.

Efficiency and sustainability results showed quite comprehensively that glyphosate on the highway was the most sustainable being more cost effective, with low environmental and high customer satisfaction and quality. In contrast acetic acid delivered intermediate costs and environmental impacts with low customer satisfaction and quality. Hot Foam generated high costs and environmental impacts but high customer satisfaction and quality.

In summary the use of glyphosate-based herbicide was the most effective for pavement weed control in the UK. The testing and the evaluation report can be found in this link https://www.bali.org.uk/news/weed-control-report-released-by-advanced-invasives/

Exploring contacts within the industry as well as via networking organisations like APSE (Association for Public Service Excellence), the service has found no strong advocates for any of the alternative solutions for highway / pavement weed spraying. Several authorities have trialled different techniques but haven't switched over often citing costs or lack of effectiveness as significant obstacles in moving away from glyphosate indicating the general uncertainty within the industry.

Research undertaken by Oxford Economics showed that glyphosate is also the most effective treatment method against some invasive species. The Parks service is aware of two authorities within the Yorkshire and Humber region that switched to alternative methods of weed control but have recently reverted back to glyphosate-based sprays to some extent, highlighting the difficulty in making this transition. Examples of other Local Authority experience is given in Appendix 1.

## 3. Other Considerations

3.1 The use of Glyphosate continues to be debated across the world. There are more who feel it is a safe and cheap option to deal with weeds on the highway and in parks and green spaces. Conversely it is seen by others as a potentially dangerous substance with affects to health and should be banned or massively reduced in use. The issue for all local authorities is that there is no 'silver bullet' to solve the problem. There are few alternatives and the ones trialled up and down the country are reportedly up to 10 times more expensive than glyphosate and many have significant environmental implications themselves.

If the UK does not follow the EU and elects to ban glyphosates, this will come at a high cost. Serious consideration will then need to be given to the alternatives and the significant cost implications.

Of note one of the major manufacturers has recently committed to spend 5.6 billion on weed killer research and have recently agreed exclusive worldwide rights to commercialise pollinator friendly insecticides clearly investigating the use of more natural based products for the future.

Moving forward at this stage it would be recommended to proceed with caution with the use of glyphosate. Any interim policy, until an affordable and affective alternative can be found, is to minimise its use as far as possible and in time away from parks and other sensitive areas mentioned earlier.

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### 3.2 Weeds in the Environment

In a rural and urban environments native weed growth provides food and shelter for insect pollinators such as bumble bees and other species, enhancing biodiversity and supporting ecosystem services. In urban settings weed growth maybe the only available food resource for bees and pollinators. However, in an urban environment the presence of weeds can also cause problems for infrastructure.

- damages highways surfaces
- increases trip/slip hazards.
- creates litter-traps and hinder litter collection.
- encourages detritus accumulations and impede surface-water drainage.
- be aesthetically unappealing to some residents and visitors.

In both the urban and rural environment, the presence of Invasive Non-Native Species (INNS) such as Japanese knotweed or giant hogweed requires urgent targeted action to control and eradicate it where possible. Glyphosate is a useful tool for the management of INNS.

In addition, the Environment Act 2021 included an amendment to the general duty on public bodies, contained in the Natural Environment Rural Communities Act 2006, to conserve biodiversity. This general duty on public

bodies is now to “conserve and enhance” biodiversity. As such the Council is required to consider how it could avoid adverse impacts and protect and enhance biodiversity.

The NERC Act 2006 is amended to:

***40****(A1) For the purposes of this section “the general biodiversity objective” is the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England.*

*(1) A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.*

*(1A) After that consideration the authority must (unless it concludes there is no new action it can properly take)—*

*(a)determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and*

*(b)take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.*

*(1B) The requirements of subsection (1A) (a) may be satisfied (to any extent) by revising any existing policies and specific objectives for taking action to further the general biodiversity objective.*

A detailed explanation of the impact of glyphosate upon biodiversity has again been provided in Appendix 3.

### 3.3 Current use of Glyphosate on adopted highway.

Currently the Parks and Cleansing Service employ a contractor who provides three sprays per year to the public highway network. This spraying regime uses specialist equipment that only targets actual weed grow rather than blanket spraying of the highway surface. This means only a few droplets are applied to the target plant and minimise the volume of spray used which provides both environmental and cost benefits. The contractor ensures their staff meet all legal requirements for using a glyphosate, and that the staff know when and where it is suitable to spray.

### 3.4 Public Health

Public Health welcome the action taken to date and outlined in the paper, to progressively reduce Glyphosate use in sensitive areas, to address the environmental and biodiversity concerns. This action will also support the aim of the District’s Food Strategy to increase the volume of our food that is grown locally, helping to make our food supplies safer, and more sustainable over time, with less chemical exposure. Environmental studies show that its impacts persist in natural environments, and are harmful to some forms of

wildlife, including pollinators, with impacts for food crops that are naturally pollinated.

The commitment to reducing Glyphosate use in ‘sensitive’ locations for biodiversity, and for the environment in general is welcome. What is good for the environment is also likely to be good for human health. A further step would be to consider ‘sensitive end users’, to borrow a term from Planning. This means taking steps to protect places where people who we would wish to be protected from exposure are most likely to be found. Sensitive end users could include children and young people, pregnant women, older people, people with respiratory illness - meaning that use close to schools, playgrounds, parks and other well-used greenspaces is progressively reduced and work undertaken with partners to encourage them to review their use in the grounds of care homes and health settings.

The trial in Shipley has shown that local people have supported the approach of reducing spraying, allowing a more natural environment with longer grass and wildflowers to thrive in the trial parks, which then feeds pollinators and local wildlife.

Health benefits could be extended by reducing any Glyphosate use in urban residential areas – allowing wild flowers, birds and pollinators to thrive in those spaces too - being close to nature, bringing nature closer to people in urban areas has mental health benefits. Empowering communities to look after the small spaces in their areas, to green our urban areas, and allow nature back in is one of the ways that we can achieve this.

## 4. FINANCIAL & RESOURCE APPRAISAL

4.1 There are limited financial impacts to either options 1 or 2 apart from the cost of signage estimated at 5k which would be found in base budget. The Shipley trial has shown that it takes slightly longer to strim weeds than to use glyphosate. This will be further assessed over the next 12 months trialling the strimming method in the other 4 areas, if option 1 is approved.

The reduction in quantities of glyphosate used at all sites will also be monitored in this period to predict further reduced glyphosate costs in 2025 and beyond .

4.2 The current costs of the weed spraying contract on the adopted highway is currently £200k. If there is no extension to the use of glyphosate after 2025 moving to an alternative treatment is estimated to cost up to 10 times this amount.

## 5. RISK MANAGEMENT AND GOVERNANCE ISSUES

5.1 The Council adheres to the strict training and guidance around the use of glyphosate to ensure that, like all chemicals used within the organisation, they are used only where needed and with health and safety being of the upmost importance.

We are becoming increasingly aware of the adverse effects of glyphosate on biodiversity and the importance a healthy environment provides to citizens and industry.

## 6. LEGAL APPRAISAL

6.1 The future legal position regarding the use of Glyphosate is unclear as it is not known at this stage whether the legal obligations regarding glyphosate under EU law will be incorporated into UK domestic law.

6.2 The Council's legal duties as regards biodiversity are referred to in the body of the report.

6.3 The Council and its contractors is required to comply with current legislation in the use of herbicides.

## 7. OTHER IMPLICATIONS

### 7.1 SUSTAINABILITY IMPLICATIONS

7.1.1 A separate annex has been provided to this report specifically addressing the subject of biodiversity in detail in Appendix 3.

### 7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

7.2.1 Cessation of spraying with no alternative control method put in place may see a small reduction in greenhouse gas emissions based on less travelling by the contractor; however almost all forms of alternative treatments will require more staff and a higher frequency of treatment seeing a net increase in travelling throughout the district. The main alternative treatments also come with their own environmental concerns:

- one of the alternative treatments requires heating of large volumes of water on site using a gas/diesel generator which would increase the greenhouse gas emissions significantly.
- another alternative treatment uses flame to kill the weeds and requires the use of portable gas cylinders.
- manual removal will require increased number of vehicles and staff to be working across the district, though this could possibly be mitigated by purchasing electric vehicles as these teams may not need to carry heavier payloads.

7.2.2 Use of glyphosate is associated with ecological changes which reduce the ability of plants, fungi, micro-organisms and the habitats they function within to store carbon.

### 7.3 COMMUNITY SAFETY IMPLICATIONS

7.3.1 The international debate about the use of glyphosate is driven by the

concerns to its risk to humans in particular, therefore it's use does have potential community safety implications. Whilst the product remains in use by the Council and its contractor, all legal guidelines around its use are upheld.

The recommendations in this report seek to reduce the use of glyphosate in parks, green spaces, near water courses, places of high biodiversity and environmentally sensitive areas.

**7.4 HUMAN RIGHTS ACT**

7.4.1 No specific issues.

**7.5 TRADE UNION**

7.5.1 Staff using glyphosate are fully trained and certified in two nationally defined qualifications and the specific procedures that cover the use of the relevant chemicals and equipment.

7.5.2 Changes to policy or method may require revision of procedures and training for staff, particularly if manual removal becomes the main form of weed control requiring detailed risk assessments to ensure how sustainable it is for long-term employee well-being.

**7.6 WARD IMPLICATIONS**

7.6.1 The current use of glyphosate affects all Wards in the district.

**7.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS**

7.7.1 Locality plans in all areas have priorities with regards environmental sustainability.

**7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE**

7.8.1 None specific

**7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

7.9.1 None specific

**8. NOT FOR PUBLICATION DOCUMENTS**

8.1 None specific

**9. OPTIONS**

**9.1 Option 1**

Shipley Area constituency to stop using Glyphosate in all Parks and Cemeteries (except in exceptional use) in April 2024 using strimming as the

control measure. The remaining 4 Areas to trial 2 parks and cemeteries in 2024 with a view to a total cessation by 2025 if successful.
Adopted Highway continues to be weed sprayed but avoiding sensitive areas highlighted within this report.

**9.2 Option 2**

All Area constituencies to stop using Glyphosate in all Parks and Cemeteries (except in exceptional use) using strimming as the control measure in April 2024
.
Adopted Highway continues to be weed sprayed but avoiding sensitive areas that are highlighted within this report.

## 10. RECOMMENDATIONS

10.1 That option 1 be approved and that clear signs are placed in all areas explaining what the council is doing.

10.2 That officers continue to add areas of high sensitivity to be avoided in the use of glyphosate.

10.3 That officers continue to liaise with other Local Authorities re best practice and experiences in the reduced use of glyphosate.

## 11. APPENDICES

11.1 Appendix 1 – Examples of Other Authorities experiences of dealing with weed growth and reducing Glyphosate.

11.2 Appendix 2 – Example of Signage used in Shipley.

11.3 Appendix 3 – Detailed Impacts of Glyphosate on Biodiversity

11.4 Appendix 4 Maps of sensitive areas to be avoided in the weed spraying programme.

## 12. BACKGROUND DOCUMENTS

12.1 Report of the Director of Place to the meeting of Regeneration and Environment Overview and Scrutiny Committee to be held on 31st January 2023. Follow this link 'Document V' (Public Pack)Agenda Document for Regeneration and Environment Overview and Scrutiny Committee, 31/01/2023 17:30 (moderngov.co.uk)

**Appendix 1 Other Local authority experience and comments**

Cambridgeshire

Has reversed a ban on chemical weed killing after more than 80% of lower authorities in the area complained that the policy was failing. Locals and councillors

reported trip hazards, damage to paving and road surfaces and scruffiness of streets due to overgrown weeds. In a unanimous vote, councillors at a highways and transport committee meeting decide to reintroduce chemical weed killing in built-up village and town areas with speed limits of 40mph or below, at least twice a year.

Calderdale

No Glyphosate based products used in Parks since 2019 but they have experienced big impacts with weed growth and manually removing the weeds from play surfaces is impacting on the integrity of the surface.

Portsmouth

The use of herbicide to control weed growth on hard surfaces is by far the most common form of pesticide in use by the authority. Weed growth can interfere with visibility for road users and weeds in kerbs or around drains can prevent or slow down drainage. Their growth and moss on pavements may eventually become a trip / slip hazard for footway users. Application of chemical herbicide is used ahead of mechanical weed control due to the ease of application, which often saves on the cost of labour and is carefully targeted to minimise product use**. It remains the most effective and cost-efficient means of weed control.**

Restricted use of selective herbicides are used for the control of weeds on fine turf and sports areas such as cricket squares, bowling greens and golf greens to control broadleaf weeds and retain a safe and uniform playing surface. This is only carried out to affected areas and where it is not practical to manage the control by hand.

Regardless of whichever timescale applies to authorised use of glyphosate, there is a will by all council services to continue reducing dependency on pesticides and using alternative methods to chemical control where these are available and demonstrated to be effective.

The steps the council are currently taking to reduce and minimise the use of pesticides include:

- Restricting use to a minimum - pesticides are only used where they are required - all treatments are targeted with no preventative treatments carried out, whether that be weed or pest control.
- A selective herbicide is no longer applied to any grassed area, other than high amenity sports turf (excluding football pitches).
- Use of weed suppressants - increased mulching of shrub beds and new tree plantings using recycled woodchip from tree works carried out in the city helps to supress weed growth and the need for treatment.
- Overplanting - an annual winter improvements programme allows for planting beds to be supplemented (gapped-up) or re-planted, not only for their aesthetic and environmental gain, but to reduce areas for weed growth and need for future treatment.
- Maintaining surface integrity - working procedures are in place for surveyors to report surface defects and arrange timely repairs. The efficient reporting of repairs reduces the potential for weeds to grow as they would through damaged paved and hard surfaces. Collaborative working between site

surveyors and design teams influence future decision making around the type of surfacing and street furniture.

- Reduced mowing of grass - to enhance and support biodiversity, teams have relaxed mowing regimes to an increasing number of areas across the city and continue to trial expansion of this. Public response has been favourable where this has been introduced and continues to inform further areas where the right balance can be found between increasing wildlife friendly grassland and scrub and public amenity use and respecting walking desire lines. All sites are on a case-by-case assessment and these changes are being monitored and reported through updates on the Council's greening strategy. Wilder site boundaries mean herbicide is no longer applied along areas such as fence lines.
- ▪Mechanical and manual cultivation - chemical treatment is no longer used when preparing beds for the popular and increasing number of wildflower and meadows seeded areas that have been incorporated across a range of green spaces and adjacent residential housing and highways.
- Mechanical weed ripper machines are used to remove moss and weeds to suitable housing curtilage areas and ball courts.
- Manual weed removal is still employed where relatively small areas are affected and it remains more time-efficient for operatives to undertake the necessary control using hand implements, than for this to be followed up by scheduled herbicide treatment.

Sheffield

Sheffield's main approach going forward is:

- Only using glyphosate on hard surfacing if required until appropriate alternatives are available.
- Relaxing the need to treat around fence lines, obstacles, trees etc and if required planning 2 strims per year to deal with priorities only.
- Signage and comms to inform parks users of the changes and encouraging Friends Of groups to support manual weeding.
- Continuing to use glyphosate to treat invasive weeds and for stump/self-set treatment.

Calderdale

In April 2020. Decided to cease the use of glyphosate completely within parks and verges and to bring a further report to phase it out of hard landscape (highways) to ascertain costs.

Havering

Havering Council currently uses herbicides to control weed growth on highways, council land, parks and open spaces. This allows the Borough to conform to both the Weeds Act (1959) and the Countryside Act (1981).

Herbicides (glyphosate) provide the most effective treatment for controlling weeds, however an integrated approach to weed control helps to limit their usage. Weeds

are required to be controlled for a number of reasons, including aesthetic (they detract from the overall appearance of an area and trap litter) and structural (weed growth can destroy paving surfaces, force apart kerbs and crack walls, therefore increasing maintenance costs)A completely (chemical) herbicide-free alternative could cost between 8 and 10 times the current cost (£0.113m per annum) of controlling weeds in the borough.

**Appendix 2 – Example of Signage Use in Shipley**

## Appendix 3 – Detailed Impacts of Glyphosate on Biodiversity

Provided by David Campbell, Biodiversity Officer, Department of Place

### Legislative Background

The Environment Act 2021 included an amendment to the general duty on public bodies, contained in the Natural Environment Rural Communities Act 2006, to conserve biodiversity. This general duty on public bodies is now to "conserve and enhance" biodiversity.

The NERC Act 2006 is amended to:

***40****(A1) For the purposes of this section "the general biodiversity objective" is the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England.*

*(1)A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.*

*(1A) After that consideration the authority must (unless it concludes there is no new action it can properly take)—*

*(a)determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and*
*(b)take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.*

*(1B) The requirements of subsection (1A)(a) may be satisfied (to any extent) by revising any existing policies and specific objectives for taking action to further the general biodiversity objective.*

As such, just over a year since the assent of the Environment Act resulted in this amendment, it is a good time to assess Bradford MDC's use of glyphosate-based herbicides.

### Introduction

Glyphosate is widely used for managing undesirable plants ("weeds" – a plant in the wrong place) in agriculture and in public spaces and gardens. It is used in conservation to eliminate robust undesirable plants which dominate habitats where less robust plant species are desired, so it is often used to prepare lands and soils prior to the creation of wildflower meadows. It is also used to remove Invasive Non-Native Species (INNS) such as Japanese knotweed and giant hogweed (both of which occur in the Bradford District).

The popularity of glyphosate is based on the understanding that it inhibits a biochemical process present in plants that is not present in animals. It is also known to be broken down by naturally occurring organisms and adsorbed to (attached to)

soil particles, reducing its ability to move out of the treated area and into the wider environment. As such it is considered to be a relatively safe chemical for weed and habitat management.

However, increasing amounts of data now exists which shows that glyphosate and the other chemicals used in products such as Roundup have adverse effects on animals; that metabolites (products made by the breakdown of glyphosate by organisms in the environment) can have equally severe adverse effects on micro-organisms and higher organisms such as mammals, fish, earthworms and pollinators such as honey and bumbles bees (a Bradford Biodiversity Action Plan group of species)[1]. It has also become evident that its persistence in soils and water allows it to be freed back into the wider environment from the original treatment location. The effect of glyphosate, to remove weeds also has effects on ecosystems, reducing food abundance for animals, increasing nutrients and altering species composition and diversity.

**Biodiversity Emergency and Species Loss**

The UK is one of the most nature depleted countries in the world. The 2019 State of Nature Report[2] highlighted that 41% of UK species had declined due to continued clearance of land for development, agricultural intensification and climate change. Declines of invertebrate abundance across Europe and North America are likely in excess of 75% in protected areas[3]. Large areas of habitats have been lost with 99.7% of fens, 97% of species-rich grasslands, 80% of lowland heathlands, up to 70% of ancient woodlands and up to 85% of saltmarshes destroyed or degraded[4]. These declines are catastrophic in their own right but also represent a threat to human society and economies as the ecosystem services or natural capital they provided is essential to food production and the maintenance of human standards of living.

**Natural Capital and Ecosystem Services**

The following is taken from the UK Parliamentary Officer for Science and Technology POSTNOTE 619 March 2020 UK Insect Decline and Extinctions[5]:

"*The economic value of pollination to UK crop production is approximately £500 million a year. Dung beetles are estimated to be saving the UK cattle industry £367 million each year and £37.42 per cow through reducing flies and increasing nutrients in the soil. Natural pest control (by ground beetles and parasitoid wasps) of widespread aphid pests is worth up to £2.3 million per year in South East England wheat fields alone. Freshwater insects in their larval stage, such as dragonflies or mayflies, can also filter water, remove pollutants and provide food for bats, birds and*

[1] K. Gandhi, S. Khan, M. Patrikar et al. 2021. Exposure risk and environmental impacts of glyphosate: Highlights on the toxicity of herbicide co-formulants. Environmental Challenges 4 (2021)
[2] http://www.nbn.org.uk/stateofnature2019
[3] : Hallmann CA, Sorg M, Jongejans E, Siepel H, Hofland N, Schwan H, et al. (2017) More than 75 percent decline over 27 years in total flying insect biomass in protected areas. PLoS ONE 12 (10): e0185809
[4] Environment Agency, Chief Scientist's Group. (2022). Working with nature.
[5] https://post.parliament.uk/research-briefings/post-pn-0619/

*fish (such as salmon and trout). These are services on which economic research has been done, many more are yet to be measured and assessed."*

Whist the direct and indirect impacts of glyphosate use can have adverse effects on habitats and ecosystems themselves, there is also potential for the ecosystem services, such as pollination, natural flood management and carbon capture to be adversely affected by the presence of glyphosate in the environment.

Whilst the extent of this impact within Bradford District has not been calculated, these ecosystem services are intrinsic elements of life in Bradford District and provide protection from negative impacts on residents and property and are essential elements of agriculture and other industries with social and economic benefits.

In comparison with other pesticides, glyphosate and the products it is used in are currently understood to generate lower adverse environmental effects however, the extensive use and sheer quantities used increases the abundance in the environment and therefore increases their potential for and severity of adverse effects on biodiversity.

**Ecological Effects of Glyphosate Use in Bradford District**

Whilst the majority of scientific studies focus on agricultural use of glyphosate, where it is used in quantity to treat large areas of arable land, use in Bradford by City of Bradford MDC is likely to cause similar effects on a smaller scale but will result in an overall increase in glyphosate, the chemicals it is combined with and the chemicals it is broken down to, in the environment.

Glyphosate and its metabolite AMPA (Aminomethylphosphonic acid) can be found in honey, soy sauce, cereals, wine and fruit juice as a result of agricultural use. So, any additional glyphosate we spray will add to the environmental, wildlife and human levels of exposure. Glyphosate and its side effects have become a major concern due to widespread use and its concentration in edible products[6] .

**Urban and Suburban Environment**

As well as use for agriculture and urban and suburban street weed management glyphosate products are available to the public in products such as Roundup and can be used in uncontrolled and unmonitored quantities, increasing the amount of glyphosate, the chemicals it is combined with and the chemicals it breaks down into in the environment, where the risk of interaction with valuable habitats and species is increased.

One direct impact of glyphosate use in urban settings is a result of the intended effect: the removal of flowering plants which, in this setting are often referred to as weeds. Whilst they may often be undesirable in an urban setting these plants provide a valuable resource for pollinating insects often in places without many other sources

[6] Tarazona, J.V., Court-Marques, D., Tiramani, M., Reich, H., Pfeil, R., Istace, F., Crivellente, F., 2017. Glyphosate toxicity and carcinogenicity: a review of the scientific basis of the European Union assessment and its differences with IARC. Arch. Toxicol. 91 (8), 2723–2743. doi: 10.1007/s00204-017-1962-5 .

of food. Whilst food availability for pollinators in urban settings is reduced, these habitats do still have a valuable role to play in wildlife conservation, particularly for bee species.[7] So with the biodiversity duty of public bodies in mind, it is pursuant on the local authority to consider its use of a pesticide in relation to its likely adverse effect in urban habitats.

The adverse effects of glyphosate on pollinators have been shown by studies such as Motta, E. V. S., Raymann, K., and Moran N. A. Glyphosate perturbs the gut microbiota of honey bees. PNAS (Proceedings of the National Academy of Sciences). October 9, 2018. vol. 115, no. 41, 10305 – 10310. This study found that while glyphosate does not act directly on honey bees, its main pathway of effect can act on the microbes present in honey and bumble bee guts. These microbes were shown to provide protection for bees from disease pathogens and the reduced abundance in the gut of bees exposed to glyphosate, made bees more susceptible to disease and subject to higher levels of mortality than those not exposed to glyphosate. In addition, the study indicates that the depleted gut biota makes bees more susceptible to poor nutrition. One cause of poor nutrition in bees is low food availability which is contributed to by the removal of nectar-bearing plants which is the intended effect of glyphosate use. The absence of nectar-bearing plants is a feature of urban environments and is compounded by the removal of “weeds” for aesthetic purposes.

Spraying with glyphosate has some potential to drift away from the application site, potentially affecting neighbouring sites. This means that the spraying of pavements and roadsides in proximity to ornamental planting beds or parks, gardens or other green space such as woodland or river corridors has the potential to affect bees and other pollinators which are drawn to flowering plants. Whilst the mode of application; spraying with a wand at close proximity to the target plant does reduce opportunity for drift in the air to occur, glyphosate sprayed on hard surfaces can still be carried to more sensitive areas in surface water run-off.

Use of glyphosate close to flowering plants and where it can enter the soil or groundwater increases the risk that it, its co-formulants or metabolites will come into contact with desirable plant species, invertebrates, fish and other animals in the terrestrial or aquatic environment.

**Rural Environment Use and Use in Proximity to Valuable Habitats**

The main pathway which may result in contact with non-target habitats, plants and animals is through spraying in proximity when particles are carried on the air or transported through groundwater and surface water away from the target area. This is accentuated in windy and wet conditions.

Persistence in soil is dependent on soil condition and oxygen availability, so some of our more valuable Bradford District habitats such as blanket bog (such as those on the South Pennine Moors SAC) and mire (such as at Bingley South Bog SSSI) are

[7] Baldock, K.C.R., *et al.* 2015 *Where is the UK’s pollinator biodiversity? The importance of urban areas for flower-visiting insects*. Proc. R. Soc. B 282: 20142849

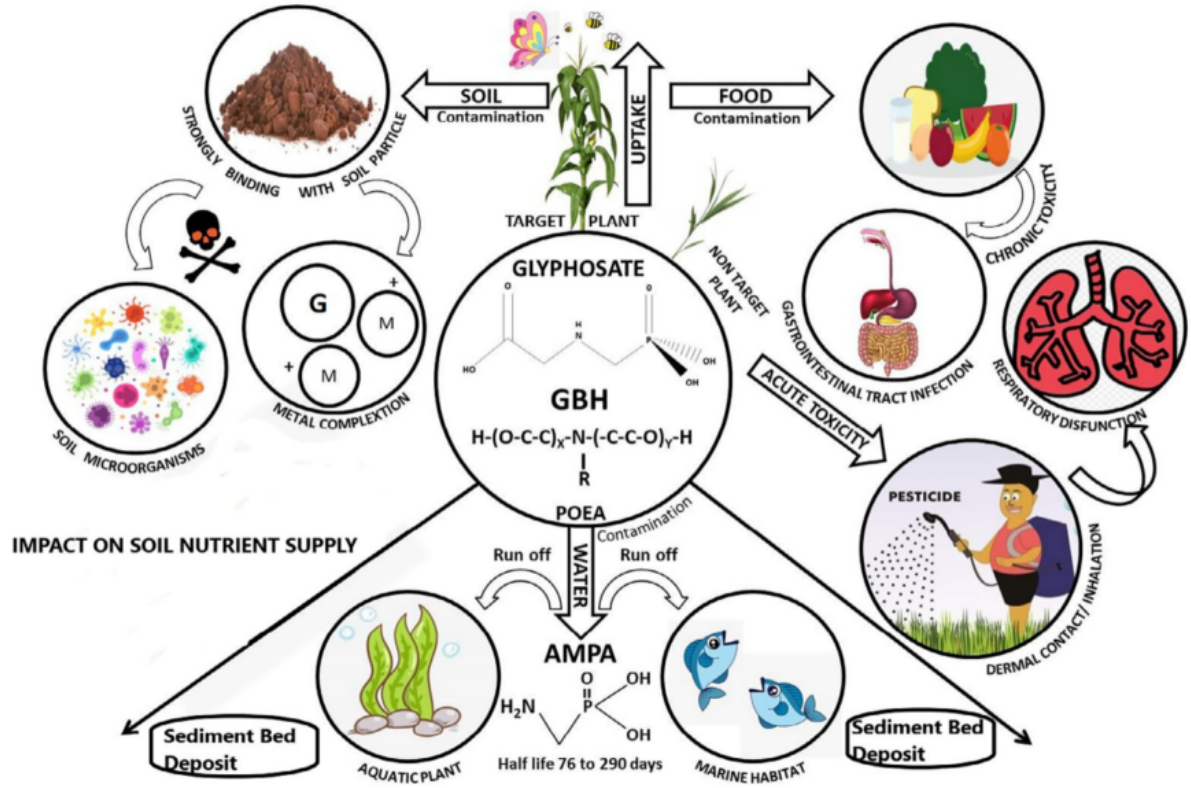
more susceptible to adverse effects due to the increased persistence of glyphosate and the increased mobility in wet habitats.

Due to its low persistence and mobility relative to other pesticides, it is often used close to water and is a useful tool for treating INNS such as Japanese knotweed and giant hogweed in these habitats. However, break down is slower in water than in soils due to reduced oxygen and microorganisms in these habitats. This means that there is potential for co-formulants and metabolites from various sources to accumulate in waterbodies where it can result in adverse impacts on fish and amphibians. Treatment of INNS in Bradford is usually carried out by injecting the stems of the plant, reducing the risk of release into the wider environment.

When glyphosate is broken down the resulting compounds have been shown to result in increases of phosphates and nitrates, which can lead to nutrient enrichment altering aquatic and wetland ecosystems, resulting in increased algal blooms. This is a particular risk to valuable habitats in the Bradford District where low nutrient levels are characteristic of the bog and mire habitats.

In rural settings, there are the same risks to habitats and species such as bees from exposure to glyphosate such as in urban habitats.

Figure 1. Shows the fate of glyphosate following application in different settings for various uses.




Environmental contamination of glyphosate
G: Glyphosate, M: Metal ion, GBH: Glyphosate Based Herbicide, POEA: Polyoxyethyleneamine, AMPA: Aminomethylphosphonic acid.

From K. Gandhi, S. Khan, M. Patrikar et al. 2021. Exposure risk and environmental impacts of glyphosate:  Highlights on the toxicity of herbicide co-formulants.

**Glyphosate use in conservation.**

Invasive Non-Native Species of plants such as Japanese knotweed and giant hogweed dominate the places they grow to the detriment of native species; they reduce the biodiversity of habitats by excluding other species. They cause damage to property (Japanese knotweed) and can injure people (giant hogweed). INNS of plants, including the two mentioned here are notoriously difficult to eradicate and prevent the spread of due to the resilience and persistence of their rhizomes (Japanese knotweed) and the effective spread of seeds (giant hogweed).

The adverse ecological effects of glyphosate use to remove these and other species has to be weighed against the adverse ecological effects that these species would cause if untreated or removed by other, less effective means. The main mode of application of glyphosate on INNS is injection. Injecting glyphosate into stems presents a lower risk of spreading glyphosate through air and groundwater.

**Summary**

It is becoming increasingly clear the widespread and often unmonitored use of glyphosate products is having damaging effects on habitats and species worldwide and in the UK. Bradford District is likely seeing some of these adverse effects on habitats, plants and animal species including bees, other pollinators and fish. Unmitigated use of glyphosate to treat roadside and urban weeds and weeds in parks and other green spaces will contribute to ecological damage of terrestrial and aquatic habitats and species.

The extensive use of glyphosate and its adverse effects on biodiversity will be contributing to the erosion of essential ecosystem services that support human agriculture, health and well-being and the economy. This will be true to some extent within Bradford District.
Glyphosate is known to cause increased mortality in honey and bumble bees. Bumble bees are a Biodiversity Action Plan group in Bradford District and with other pollinators provide an essential function.

Glyphosate spraying on roads and footpaths and in green spaces has the potential to alter some of Bradford’s most valuable protected habitats in Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites through airborne drift and in surface and groundwater.

**Recommendations of the Biodiversity Officer**

It is the recommendation of the biodiversity officer that City of Bradford MDC should make efforts to cease the use of glyphosate by the council in most circumstances. The extensive use of glyphosate across the district is liable to be contributing to the continued loss of biodiversity in the district, particularly affecting invertebrate pollinators such as bumblebees.

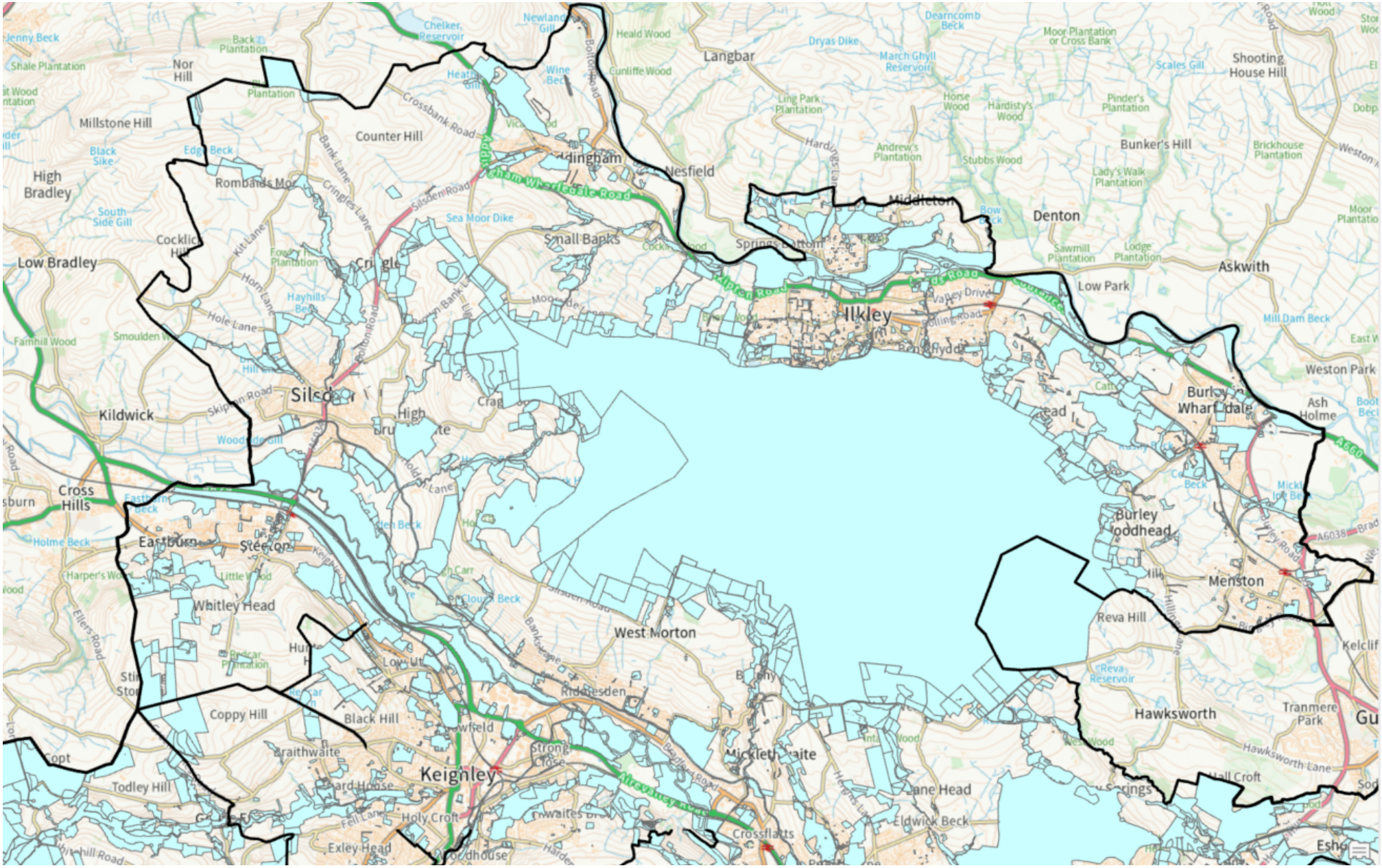
Considering the extent of glyphosate use for maintenance of public space we understand that there would be difficulties in ceasing use entirely and we would support its continued use as a method for managing Invasive Non-Native Species.

With the above in mind, we recommend that glyphosate use is restricted to urban, hard-surfaced areas away from sensitive ecological features, flowerbeds and ornamental planting beds, parks and wildflower areas and hedgerows that attract honey and bumblebees and other pollinators and where glyphosate may enter the soil and come into contact with earthworms. Its use should be restricted in locations close to watercourses and/ or where surface water runoff would carry mobile glyphosate products into watercourses. The exception to this should be in cases where glyphosate can be directly applied by injection to Invasive Non-Native Species as the conservation benefits of use in this situation and the relative low risk of transport of the pesticide mean it would be an overall benefit.

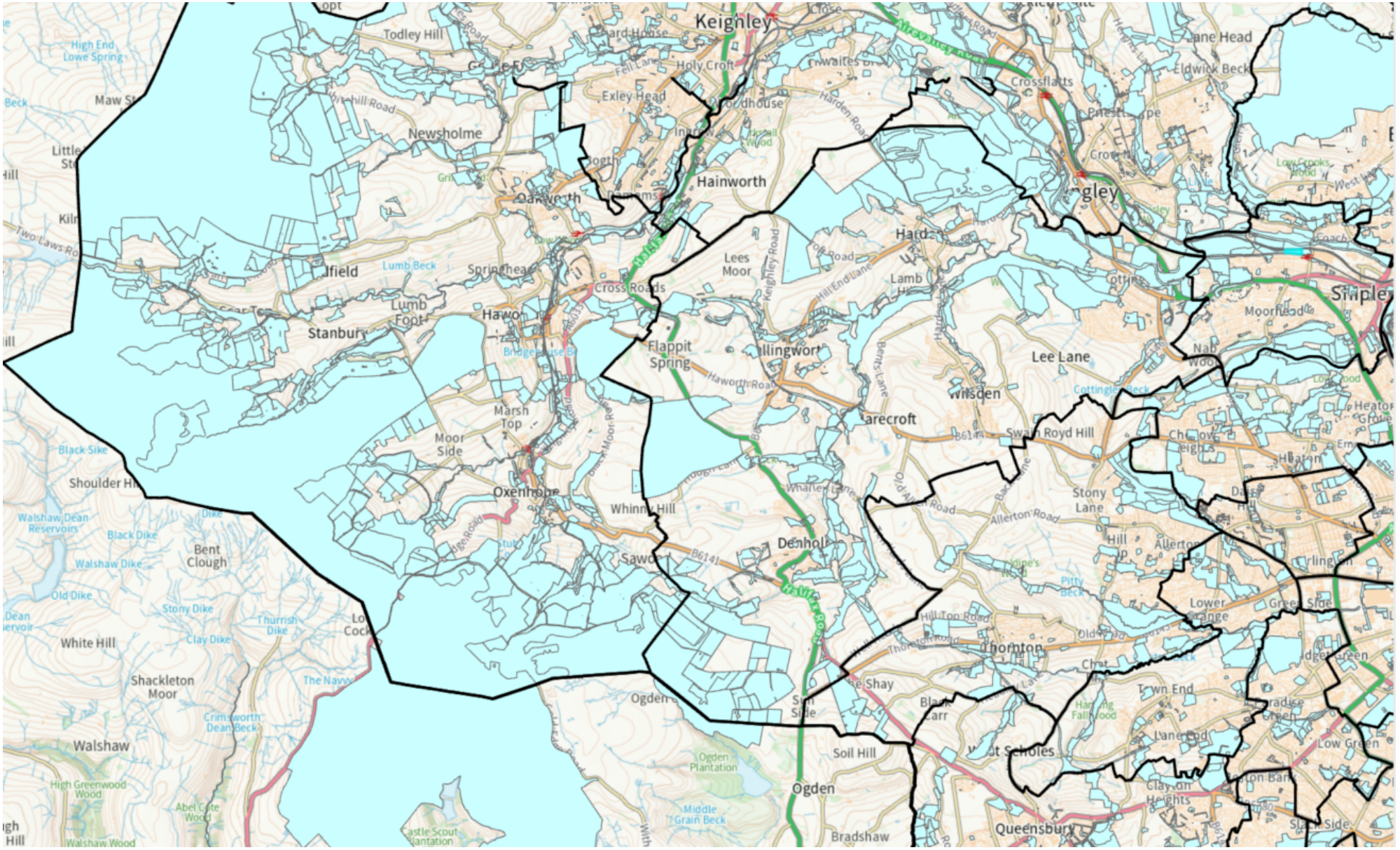
In order to establish the public reaction to a complete moratorium of use by the council for street scene maintenance, pilot areas should be identified. Local residents should be consulted and involved in the pilot and expectations of changes to the street scene, with an increase in weeds, managed and promoted as a positive step for biodiversity and sustainability.

A decision to pro-actively reduce glyphosate use and work with Bradford residents towards cessation of use across the district aligns with legislative requirements of the Environment Act 2021 and the updated Biodiversity Duty in the NERC Act 2006 as well as Bradford’s Clean Growth agenda and would respond to the critical situation we are facing with regards biodiversity loss.

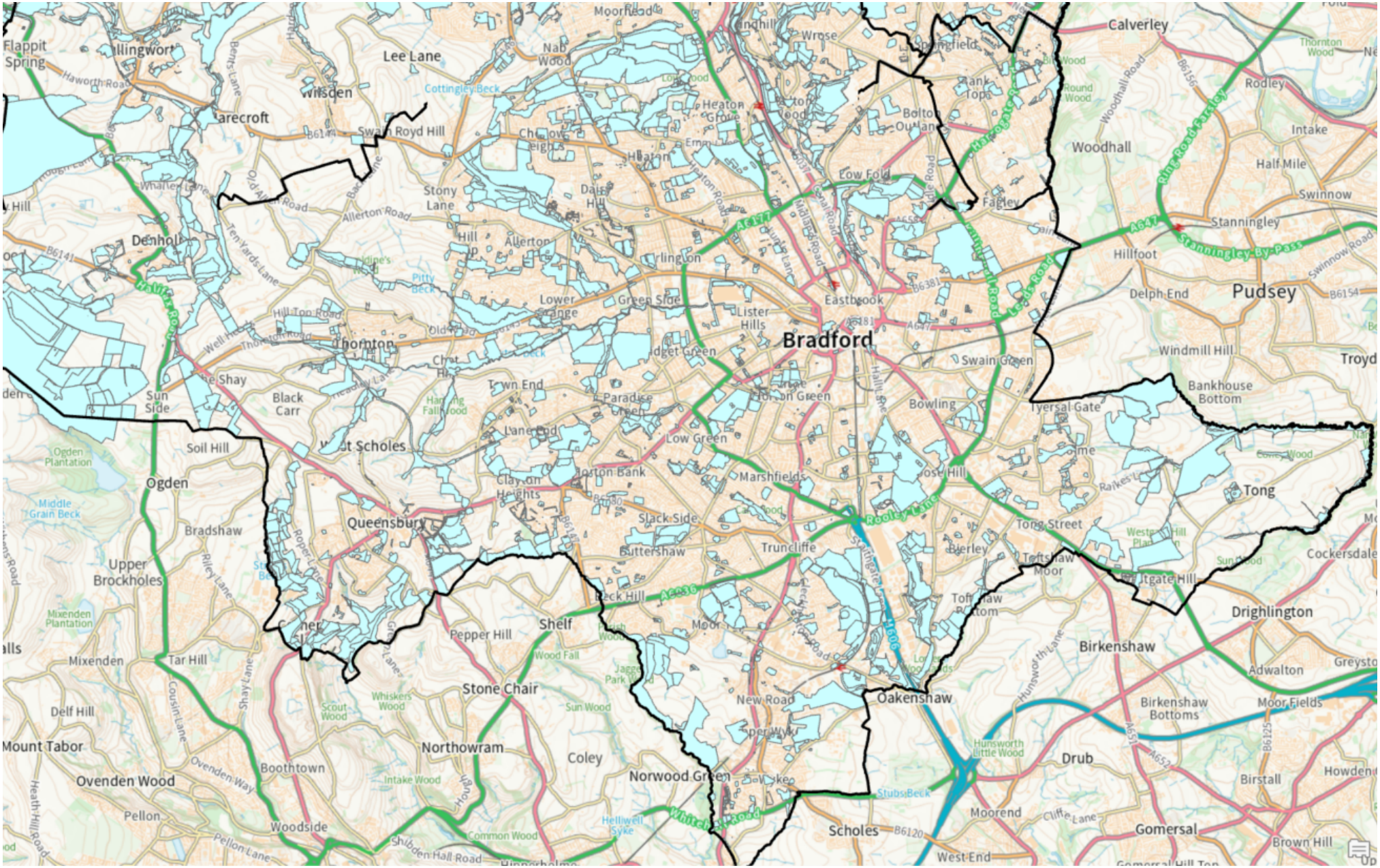
**Mapping of Glyphosate sensitive sites** **APPENDIX 3**




**Northern district**




**Western District**




**South and East District**

City of BRADFORD METROPOLITAN DISTRICT COUNCIL

# Report of the Director of Place to the meeting of Regeneration and Environment Overview and Scrutiny Committee to be held on 19th March 2024.

**AH**

## Subject:

**Fly-tipping in the Bradford District.**

## Summary statement:

A report providing an update on the work of the Environmental Enforcement Team in relation to fly tipping and other waste related crime.

**EQUALITY & DIVERSITY:**

There are no equality or diversity issues affected by this report.

David Shepard
Director of Place

Amjad Ishaq
Environmental Services & Enforcement Manager Officer Phone: (01274) 433682
E-mail: amjad.ishaq@bradford.gov.uk

**Portfolio:**

**Healthy People and Places**

**Overview & Scrutiny Area:**

**Regeneration and Environment**

## 1. SUMMARY

The report provides an update on the work of the Environmental Enforcement Team in relation to fly tipping and other waste related crime.

## 2. BACKGROUND

Fly-tipping is a national problem and not just experienced in the Bradford district. Public and private landowners throughout the UK are continually engaged in combatting this type of criminal activity. Local authorities, the Environment Agency, DEFRA, Keep Britain Tidy are among a large number of organisations directly contributing to tackling this issue through a number of strategies including carrying out clearances, investigations and associated legal interventions, or providing research and guidance; despite all this the issue of fly-tipping is one that continues to persist.

## 3. REPORT ISSUES

### Environmental Enforcement

3.1 The Environmental Enforcement Team is responsible for enforcing legislation relating to waste and the visible environment. The Team consists of ten full time equivalent (FTE) staff and two managers whom all operate across the full district. In addition, 5 of our Neighbourhood Wardens will continue to support the work of the Enforcement Team.

3.2 Environmental Enforcement Officers respond to complaints from the public generated through the Council's Contact Centre and from referrals by a number of sources including Neighbourhood Wardens, Councillors and other Neighbourhoods' staff. Typically, these referrals (termed service requests) can range from fly-tipping, rubbish in domestic gardens, litter & dog fouling, waste from commercial premises, burning of waste through to rodent infestations. In the 2022/23 financial year the Environmental Enforcement Team dealt with 10,916 service requests of which 2692 (~25%) were complaints about fly-tipping.

3.3 A recent review of a number of services that deal with the visible environment has resulted in the Environmental Enforcement Team moving from Neighbourhood & Community Services to Waste, Fleet, Environmental Health & Licensing Services. The improved operational synergies between Street Cleansing, Waste Collection and Environmental Enforcement will facilitate closer and more coordinated working relationships between these services.

3.4 Fly-tipping is a criminal offence that carries an unlimited fine or up to 5 years' imprisonment upon a successful prosecution outcome. Bradford Council will endeavour to prosecute serious cases of fly-tipping but can also issue fly-tipping fixed penalty fines of £400 or £100 depending on the nature and circumstances of the offence.

3.5 The Environmental Enforcement Team actively investigate fly-tipping incidents to identify the perpetrator and take enforcement action, where appropriate, against offenders. When individuals are positively identified, the Team will look to issue fixed

penalty notices, or take formal legal proceedings (issue formal cautions or prosecute) for the most serious offences. Prosecutions can be time consuming, resource intensive and costly so since their introduction in 2019, the preferred enforcement option for fly-tipping has been to issue fixed penalty notices. These deliver an immediate financial penalty and act as an effective salutary warning to perpetrators. In addition, the Enforcement Team can seize vehicles that have been proven to have been involved in fly-tipping and the team intends to use of this strategy to disrupt enviro-crime activity as much as possible .

3.6 The table below highlights some of the enforcement actions taken by the Enforcement Team in relation to waste offences over the last 2 full financial years and the current financial year to the date of drafting this report

| **Enforcement Actions** | **2021/22** | **2022/23** | **2023/24 (Apr-Jan)** |
|---|---|---|---|
| **TOTAL SERVICE REQUESTS RECEIVED** | 10,211 | 10,916 | 7177 |
| **REPORTS OF FLY-TIPPING** | 2,854 | 2692 | 2180 |
| **PERCENTAGE DUE TO FLY-TIPPING** | 28% | 27% | 30% |

| **ENFORCEMENT ACTIONS** | **2021/22** | **2022/23** | **2023/24 (Apr-Jan)** |
|---|---|---|---|
| **Community Protection Warning** | 876 | 796 | 672 |
| **Other Warning Letters** | 176 | 118 | 127 |
| **Community Protection Notices** | 193 | 162 | 171 |
| **Other Statutory Notices** | 161 | 161 | 111 |
| **EPA s33 - Fly-tipping Fixed Penalty Notice (FPN)** | 62 | 63 | 90 |
| **EPA s34(2A) - Householder Duty of Care FPN** | 16 | 17 | 7 |
| **EPA s88 - Littering from Vehicle FPN** | 46 | 14 | 4 |
| **EPA s88 - Litter from Person FPN** | 29 | 23 | 8 |
| **Litter From Vehicle Penalty Charge Notice (Civil Offence)** | 115 | 657 | 1629 |
| **Dog Fouling FPN** | 8 | 6 | 12 |
| **Other Fixed Penalty Notices** | 10 | 8 | 12 |
| **Offences Caught on CCTV** | 129 | 668 | 189 |
| **Enforcement Action Taken/Pending from CCTV** | 65 | 640 | 162 |
| **Vehicles seized** | 2 | 10 | 3 |

| | | | |
|---|---|---|---|
| **Prosecutions & Cautions** | 6 | 18 | 4 |

**Investment in CCTV**

3.7 Over the last 3 years the Environmental Enforcement Team has been allocated a total £150,000 in capital funding to purchase and then deploy CCTV to assist in the capture of fly-tipping and littering incidents. This much welcomed investment has enabled the Team to proactively target known fly-tipping and littering hotspots in order to identify, and then take enforcement action against, people committing these offences. The investment is paying dividends in tackling this.

3.8 A total of 151 fixed CCTV cameras have now been deployed at 87 locations across 16 Wards and a significant number of fly-tipping incidents have been captured on camera resulting in enforcement action being taken and more cases are currently under investigation. The more extensive use of CCTV has resulted in an increase in the numbers of fly-tipping and littering fixed penalty notices being issued and also contributed to a number of vehicles being seized.

3.9 The number of fixed fly-tipping cameras deployed by Ward are as follows:

| | |
|---|---|
| BINGLEY | 1 |
| BOWLING & BARKEREND | 30 |
| BRADFORD MOOR | 2 |
| CITY | 29 |
| CLAYTON & FAIRWEATHER GREEN | 2 |
| GREAT HORTON | 20 |
| MANNINGHAM | 17 |
| SHIPLEY | 3 |
| TOLLER | 11 |
| WIBSEY | 2 |
| KEIGHLEY CENTRAL | 4 |
| KEIGHLEY WEST | 4 |
| QUEENSBURY | 6 |
| WYKE | 4 |
| TONG | 8 |
| LITTLE HORTON | 8 |
| **TOTAL** | **151** |

3.10 Following a successful trial of new 4G cameras that use smartphone technology, the team has purchased a further 10 4G cameras which are now being deployed in areas where installation of fixed CCTV was not historically possible. The 4G cameras have the functionality to enable control remotely and provide high resolution images which can be reviewed at the CCTV control room or at the Enforcement Team offices.

3.11 In addition, the team continue to use a range of other cameras (such as “VIPA” and “wildlife cameras”) that enable surveillance to be delivered at locations where fixed or 4G cameras are not suitable. As these locations vary throughout the year it is not possible to list these in a locality breakdown.

3.12 In order to further increase the team’s capacity to detect and review fly-tipping and littering incidents the team has invested capital funding in a bespoke CCTV review suite based at the Enforcement Team Offices at Harris St Depot. This allows direct access to review and download footage of litter disposal from vehicles and other fly-tipping offences caught on camera. Additional officers in the team have also been trained to use the review suite which will enhance the team’s capability of detecting fly tipping offences. The investment in CCTV to date has resulted in a significant increase in the number of fixed penalty fines being issued.

**Litter from vehicles - Caught on Camera.**

3.13 Public littering continues to be a problem both nationally and locally and similar to many cities there are a significant number of takeaways in the district. This has resulted in takeaway litter being a persistent issue in some parts of the district.

3.14 Legislation introduced in 2020 now facilities the fining of registered keepers of vehicles if either the driver or its passengers drop litter from the vehicle. These are civil penalties (similar to parking fines) and a collaborative approach between the Parking Services Team and the Environmental Enforcement Team has led to an innovative approach to tackle this type of littering from vehicles. Officers from both teams have been working together, using CCTV, to detect littering offences, issue fines and deal with any appeals. Litter enforcement will complement existing strategies (such as education and engagement) to reduce takeaway litter, especially takeaway litter being dropped from vehicles.

3.15 Litter enforcement cameras have been deployed at 8 locations in the Bradford district resulting in 1629 fines being issued for litter from vehicle offences since their introduction. The team will continue to deploy CCTV cameras at new and emerging litter hotspots as and when these are identified.

3.16 The public are also being encouraged to report litter from vehicles when offences are caught on dash-cams. Information on how to report littering is detailed on the Council website, and also on our new design pay-and-display car parking tickets. VMS boards (vehicle messaging boards) will also be used to display anti littering during periods when there are no priority messages that need to be displayed.

3.17 Bradford Council was one of the first Councils outside of London to adopt this recently enacted legislation and remains the only Council in the whole of Yorkshire to enforce litter from vehicle offences. This pioneering approach has resulted in the Environmental Enforcement Team being shortlisted as a finalist in the Keep Britain

Tidy Awards under the category of “Excellence in Enforcement” category.

## 4. FINANCIAL & RESOURCE APPRAISAL

4.1 The delivery of this area of the Councils responsibilities is highly dependent of its staffing resource. As the Council progresses its plans to deliver its services within a more sustainable budget any reductions in the budget of this team will inevitably result in reductions in the investigatory work and subsequent enforcement activity.

## 5. RISK MANAGEMENT AND GOVERNANCE ISSUES

The impact of fly tipping and illicit waste disposal in our local communities is recognised, but as City of Culture 2025 becomes more imminent there will increasing concerns about fly tipping/littering on any major routes into the district and that presents a risk to the reputation of the Council and local communities during a pivotal year for the district.

## 6. LEGAL APPRAISAL

The relevant legal issues are referred to in the report.

## 7. OTHER IMPLICATIONS

### 7.1 SUSTAINABILITY IMPLICATIONS

There are no sustainability implications

### 7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

There are no greenhouse gas emission impacts

### 7.3 COMMUNITY SAFETY IMPLICATIONS

There are no community safety implications

### 7.4 HUMAN RIGHTS ACT

There are no Human Rights Act implications

### 7.5 TRADE UNION

There are no Trade Union implications

### 7.6 WARD IMPLICATIONS

None specific

### 7.7 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)

Not applicable

## 7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

There are no particular implications for children and young people.

## 7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

Not applicable

## 8. NOT FOR PUBLICATION DOCUMENTS

None

## 9. OPTIONS

This report is providing an update on the subject of fly-tipping/ littering and its investigation and subsequent enforcement. There are currently no requirements for any policy decisions to be presented to Members.

## 10. RECOMMENDATIONS

- That the contents of this report be noted
- That a further update on activity be provided in 12 months' time.

## 11. APPENDICES

None

## 12. BACKGROUND DOCUMENTS

**Fly tipping in the Bradford District**. Report of the Director of Place to the meeting of Regeneration and Environment Overview and Scrutiny Committee to be held on 21st March 2023. (Public Pack) Agenda Document for Regeneration and Environment Overview and Scrutiny Committee, 21/03/2023 17:30 (moderngov.co.uk)

**Fly tipping in the Bradford District**. Report of the Director of Place to the meeting of Regeneration and Environment Overview and Scrutiny Committee to be held on 11th January 2022.
(Public Pack) Agenda Document for Regeneration and Environment Overview and Scrutiny Committee, 11/01/2022 18:30 (moderngov.co.uk)

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City of BRADFORD METROPOLITAN DISTRICT COUNCIL

# Report of the Strategic Director (Place) to the meeting of Regeneration & Environment and Overview and Scrutiny Committee to be held on 19th March 2024

**AI**

## Subject:

## Waste & Fleet Services - Performance and Contract review

## Summary statement:

**This report provides a description of the service provision and all Waste related activities during 2023 and those planned for 2024, to improve the management of waste to more sustainable levels in line with the Waste Strategy (Municipal Waste Minimisation and Management Strategy 2015).**

**This report also now includes details on the performance of Fleet Services and the "Managed Stores" contract.**

**EQUALITY & DIVERSITY:**

Equality assessments - Please consider and comment on the equality impacts of any new, review, or removal of policies, practices, strategies, services or functions. In some instances this may require the completion of an equality impact assessment form. Full guidance is available on BradNet.

Equality objectives – if the work presented contributes to one of the Council's equality objectives a statement must be provided to explain what and how (more detail available in the report guide).

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**Strategic Director**

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**Head of Waste & Fleet**
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**Portfolio:**

**Cllr Sarah Ferriby**

**Overview & Scrutiny Area:**

**Regeneration & Environment**

## 1. SUMMARY

This report provides a description of Waste Services operations, and an update on the work projects undertaken in 2022 to 2023, and those planned for 2024 in order to manage waste to more sustainable levels (e.g. minimise residual waste and increase recycling) in line with the Waste Strategy (Municipal Waste Minimisation and Management Strategy 2015) and the impending 2023 Government Waste Strategy implementations.

We have also no included details on the annual performance of Fleet Services and its main contract for a “Managed Stores” function. During 2023, both Waste and Fleet Services merged to provide a streamlined and cost-efficient function to the district and Council services.

## 2. BACKGROUND

The Council has statutory responsibilities for the following waste streams which are currently managed by Waste Services:

- Kerbside Collections of dry mixed recycling (DMR) from residents;
- Kerbside Collections of residual household waste from residents;
- Bulky Waste collections upon request from residents (paid for service);
- Clinical Waste collections upon request from residents (not under district healthcare);
- Provision of Household Waste Recycling Centres (HWRCs) across the district;
- Closed Landfill site monitoring;

In addition to the above, Waste Services also provide the following discretionary services which can be requested:

- Kerbside Collection of Garden Waste (paid for service)
- Trade Waste Services to commercial businesses (paid for service)
- Clinical Waste collections to commercial businesses (paid for service)
- Waste Electrical and Electronic Equipment (WEEE) collections to residents (paid for service)

All the above services are provided by in-house operations (described below), which are supported by several external contracts with the private sector for treatment of recyclates, residual waste and disposal services.

### 2.1 CURRENT SERVICES (2023)

#### 2.1.1 Kerbside Collections

The collection service operates an Alternate Weekly Collection regime (AWC) where residual waste is collected on one week, and DMR the next, requiring 38 collection rounds, including 2 rural collections.

Most collections are made via 26 tonne Refuse Collection Vehicles (RCVs) with smaller vehicles being used for areas which are inaccessible to the larger RCVs. 2023 has seen the inclusion of a 32-tonne collection vehicle which is capable of carrying approx. 40% extra

waste compared to standard vehicles which allows us to increase efficiency.

Going forward property growth and the impact it has on the Service will be an on-going consideration as part of the budget setting process. On average, a new round is required per 5,000 to 6,000 properties. This figure varies between rounds due to distance, property types etc.

Each property utilises standard 240L wheeled bins for residual waste and DMR. This can be increased at cost to the resident for larger households to an additional 140L bin for residual waste.

Communal properties tend to have larger 1100L wheeled containers that are shared between the properties and in most cases are purchased by the Management Companies/Landlords under their responsibility for waste bin provision to residents. There is no defined ratio of communal bins per communal property but nationally, 1 x 1100L bin per 5 properties if multi-occupied seems to be the norm. This reduces to 1 per 8 properties for sole occupants. We advise of the relevant quantities required and monitor this moving forward but have no actual control over this area.

Approx. 110,000 tonnes of residual waste and 42,000 tonnes of DMR are collected from kerbside each year. Equating to around 600kg and 230kg per household respectively. This varies massively between different sized households and locations meaning that rounds are constantly being monitored to ensure they are efficient.

Approx. minimum of 88 RCV loads per day are required to facilitate the collection of material from kerbside.

### 2.1.2 Kerbside Recycling

The use of a fully comingled DMR bin makes our system one of the simplest systems in the country for the householder to use. However, we then need to sort the DMR into separate commodities to comply with Waste Regulations. The Environment Act 2021 has various legislative requirements for Councils. We have awaited the announcement of various changes which were deferred in 2021, 2022 and 2023, all of which will affect our service delivery and budget.

Market conditions, demand and ability of processors for a core mix of glass, cans, plastic, paper and card, changes on a monthly basis. We suffer with up to 45% contamination within DMR consisting of food, liquids, oils, nappies etc. This contamination tends to be hidden at the bottom of bins and in plain view sometimes and one bin can potentially contaminate a part or full load in a RCV.

2023 has seen a marked improvement in income from DMR sales compared to the previous three years. Combined with changes to our processing regime and use of third parties, we have seen the lowest operational cost for a number of years in this area. However, we are still seeing high levels of contamination despite all efforts to reduce this at source.

### 2.1.3 Garden Waste Collections

This paid for service which commenced in June 2016, with over 34,000 customers signing up for the service in 2017, over 35,000 in 2018, over 37,000 in 2019 over 40,000 in following years.

Currently we collect on a 12 x 4 weekly collection cycle, with no collections from early December to early January. The present annual charge for this service is £48 paid for up front with an early-bird discount of £8.

The garden waste is then sent for processing in to a PAS100 quality compost by a Contractor.

### 2.1.4 Bulky Waste Collections

This service is provided to domestic residents via a request system, for which an up-front charge is levied. The scale of charges relates to the number of items requiring removal, and a collection date is now provided at the point of service request. Collections are provided by a two teams working Tuesday to Friday, with demand for the service remaining fairly consistent at approximately 10,000 requests producing around 1,100 tonnes annually.

The charge to customers is now £30 for 5 items. The costs of service provision are directly linked to increases in vehicle, fuel, staff and waste disposal legislation and therefore need to be reflected in the annual review of charges.

These items are essentially furniture-type products that are too large to be placed in a bin and that residents are unable to transport to a HWRC. The service is for residents only and should not be used by commercial companies or Landlords.

In January 2023, the Environment Agency, Introduced new legislation on Persistent Organic Pollutants (POPs) which mandated that any cushioned or upholstered seating must be collected, hauled, stored and incinerated separately to all other waste streams. This has proved challenging and expensive to comply with.

### 2.1.5 Clinical Waste Collections

The Council has a duty to collect certain clinical and offensive waste from residents who are treating themselves at home. A suitably trained driver and specialised collection vehicle are used to facilitate this. The service is currently provided free, although Councils are able to charge for the collection aspect of the provision.

Where are resident is under district care, it is the responsibility of the care provider to dispose of any associated clinical waste.

In addition to providing a clinical waste and offensive waste collection under section 22(3) of the Control of Pollution Act 1974 or section 89, 92(9), 92C(3) or 93 of the Act which is to be treated as household waste or commercial waste in accordance with entries 1 to 6, the service generates income by providing this service to other 3rd parties where we are not required under statutory provision to provide this.

This includes agreed collections at cost from Dentists, Doctors, Clinics, Pharmacies, Tattooists and similar with income used to cover costs of the service provision. Approx. 20 tonnes of Clinical waste are collected each year.

### 2.1.6 Household Waste Recycling Centres (HWRCs)

The Council currently provides eight Household Waste Recycling Centres (HWRCs) to the district's residents. These sites are staffed and open seven days per week, excluding Bank Holidays, providing a wide range of containers to encourage recycling. A van permit scheme was introduced in 2006 to combat abuse of such sites by traders. In 2013 a residents' only

permit scheme was introduced to control cross border activity.

In March 2017 every household in the district was issued with a permit as part of the annual council tax papers sent to all 225,000 households. This now makes HWRC permits universally available to all our residents, encourages responsible management of domestic wastes and promotes greater recycling. Permits can also be requested via our two main HWRCs in Bradford and Keighley.

Materials accepted at HWRCs include; residual waste, paper, cardboard, metal, glass, green waste, wood, plastics, shoes, textiles, books, oil (both engine oil and vegetable oil), paints, carpets, mattresses, push bikes (which go to a reuse scheme) soil, bricks and rubble, polystyrene, batteries, light bulbs, florescent tubes, electrical equipment and unwanted household chemicals.

Our two Transfer Loading Stations (TLS) with prior notice, also accept Trade waste and other chargeable materials such as windows, tyres, plasterboard etc. for a cost to cover the operation of haulage, documentation and disposal. Specialist waste such as bonded asbestos, clinical and offensive can also be deposited by residents.

On average, around 42,000 tonnes of material is deposited at the HWRCs per year. This consists of 16,000 tonnes of general waste and 26,000 tonnes of other materials as described above.

Resident visits have been measured since April 2020 with 2023 data provided below. These figures have seen peaks of 11,000 to 18,000 visits per site during summer months and lows of 2,000 to 6,500 in winter months.

We have recorded circa 925,000 visits during 2023 which is an approximate 200,000 reduction on 2022 figures. Midland Rd, Dowley Gap and Dealburn Rd are the most visited sites again this year but as displayed below, levels of activity per day vary from site to site each month.

In regard to tonnage received, there is a slight reduction to 38,338 tonnes in 2023 vs 39,673 in 2022 and a continued large reduction vs 50,362 in 2021. Average weights received per visitor vary from 26kgs to 80kgs with Midland Rd and Bowling Back Lane receiving consistently higher weights per visitor than other sites.

| Visitors per site | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Total visits |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Midland Road | 10,889 | 10,246 | 8,391 | 8,896 | 15,137 | 14,613 | 14,906 | 17,890 | 15,144 | 12,383 | 11,445 | 7,886 | **147,827** |
| Dowley Gap | 9,830 | 9,515 | 7,954 | 8,801 | 14,647 | 12,547 | 13,901 | 16,427 | 14,161 | 12,581 | 11,135 | 7,106 | **138,605** |
| Dealburn Road | 9,809 | 8,670 | 7,829 | 9,321 | 14,835 | 14,118 | 12,535 | 12,838 | 10,737 | 9,232 | 8,314 | 6,336 | **124,574** |
| Bowling Back Lane | 8,148 | 7,736 | 7,315 | 6,879 | 14,176 | 12,156 | 11,291 | 12,077 | 10,429 | 8,180 | 8,050 | 7,750 | **114,187** |
| Royd Ings Keighley | 8,555 | 7,856 | 7,345 | 7,213 | 13,246 | 10,924 | 10,498 | 12,770 | 10,313 | 9,146 | 8,497 | 7,476 | **113,839** |
| Sugden End | 8,043 | 7,258 | 5,524 | 6,848 | 10,500 | 10,372 | 9,863 | 9,980 | 9,100 | 7,771 | 6,665 | 4,200 | **96,124** |
| Ford Hill | 7,853 | 6,844 | 4,992 | 5,784 | 10,890 | 10,468 | 9,796 | 9,058 | 11,148 | 7,699 | 6,767 | 4,200 | **95,499** |
| Golden Butts | 7,060 | 5,868 | 5,573 | 5,581 | 8,507 | 7,909 | 9,842 | 11,369 | 10,419 | 8,313 | 8,700 | 5,566 | **94,707** |
| | | | | | | | | | | | | | |
| **Grand Total** | **70,187** | **63,993** | **54,922** | **59,323** | **101,938** | **93,107** | **92,632** | **102,409** | **91,451** | **75,305** | **69,573** | **50,520** | **925,360** |

| Tones per year | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Total tonnes |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 21/22 | 3,120 | 3,451 | 5,583 | 5,428 | 4,461 | 5,520 | 4,936 | 4,946 | 4,101 | 3,398 | 2,950 | 2,468 | **50,362** |
| 22/23 | 2,989 | 2,460 | 4,024 | 3,934 | 3,868 | 3,860 | 3,610 | 4,031 | 3,328 | 2,930 | 2,606 | 2,032 | **39,673** |
| 23/24 | 2,485 | 2,604 | 2,567 | 3,573 | 4,450 | 3,916 | 3,655 | 4,080 | 3,517 | 2,926 | 2,620 | 1,945 | **38,338** |

| Tonnes per site | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Total tonnes |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Midland Road | 562 | 538 | 525 | 715 | 855 | 867 | 773 | 913 | 741 | 623 | 529 | 408 | **8,049** |
| Bowling Back Lane | 474 | 430 | 421 | 518 | 723 | 614 | 540 | 600 | 547 | 400 | 370 | 311 | **5,949** |
| Dowley Gap | 320 | 378 | 344 | 532 | 674 | 581 | 536 | 569 | 481 | 457 | 395 | 276 | **5,545** |
| Royd Ings Keighley | 357 | 325 | 335 | 436 | 609 | 436 | 475 | 518 | 436 | 375 | 321 | 268 | **4,890** |
| Dealburn Road | 302 | 276 | 300 | 418 | 488 | 448 | 417 | 445 | 381 | 315 | 256 | 225 | **4,271** |
| Sugden End | 219 | 251 | 239 | 348 | 346 | 337 | 342 | 386 | 333 | 269 | 254 | 133 | **3,456** |
| Ford Hill | 204 | 219 | 219 | 322 | 449 | 377 | 299 | 334 | 313 | 264 | 228 | 159 | **3,385** |
| Golden Butts | 238 | 188 | 185 | 284 | 306 | 256 | 274 | 314 | 286 | 223 | 266 | 164 | **2,984** |
| | | | | | | | | | | | | | |
| **Total per month** | **2,485** | **2,604** | **2,567** | **3,573** | **4,450** | **3,916** | **3,655** | **4,080** | **3,517** | **2,926** | **2,620** | **1,945** | **38,338** |

| Weight per visitor (Kilos) | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Average per visitor |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Midland Road | 52 | 53 | 63 | 80 | 56 | 59 | 52 | 51 | 49 | 50 | 46 | 52 | **55** |
| Bowling Back Lane | 58 | 56 | 58 | 75 | 51 | 50 | 48 | 50 | 52 | 49 | 46 | 40 | **53** |
| Royd Ings Keighley | 42 | 41 | 46 | 60 | 46 | 40 | 45 | 41 | 42 | 41 | 38 | 36 | **43** |
| Dowley Gap | 33 | 40 | 43 | 60 | 46 | 46 | 39 | 35 | 34 | 36 | 35 | 39 | **41** |
| Ford Hill | 26 | 32 | 44 | 56 | 41 | 36 | 31 | 37 | 28 | 34 | 34 | 38 | **36** |
| Sugden End | 27 | 35 | 43 | 51 | 33 | 33 | 35 | 39 | 37 | 35 | 38 | 32 | **36** |
| Dealburn Road | 31 | 32 | 38 | 45 | 33 | 32 | 33 | 35 | 35 | 34 | 31 | 36 | **35** |
| Golden Butts | 34 | 32 | 33 | 51 | 36 | 32 | 28 | 28 | 27 | 27 | 31 | 30 | **32** |
| | | | | | | | | | | | | | |
| **Average kg per visitor** | **38** | **40** | **46** | **60** | **43** | **41** | **39** | **39** | **38** | **38** | **37** | **39** | **41** |

Major changes to HWRC provision are expected in 2024 due to budget demands and waste legislation changes. This may include closure or limitations on certain sites, subject to consultation.

### 2.1.7 Transfer Loading Stations (TLS)

The service has two Transfer Loading Stations, one at Bradford, Bowling Back Lane and one at Keighley, Royd Ings Avenue. The TLS is where the waste collected is tipped off and weighed. The two loading stations receive approximately 230,000 tonnes of materials per year with Bradford accounting for circa 70% of material.

The tonnage described above is transferred to various processing and/or disposal sites by a mixture of internal fleet and contracted haulage. Approx. 40 truck-loads per day are required to facilitate the movement.

### 2.1.8 City Centre Nodes

2016 saw the first two Recycling Collection Nodes piloted in Bradford City Centre for residents living in multi occupancy accommodation, this was initially due to the number of large old office building being converted to apartments and not enough provision being made for the residents by developers. There are now four Nodes within the City Centre placed strategically for residents and pedestrians to recycle, glass, cans, plastic bottles, paper and cardboard. They are located in Little Germany, outside Britannia House, Manor Row and Forster Square. Further options are being considered for the City Centre.

The Nodes are collected fortnightly by RCVs. There have been some instances of contamination of non-recyclable material on occasions.

One issue with having on-street nodes is that some residents, businesses and by-passers see it as a central waste collection site and leave waste at the side of the nodes. This also happens with on-street waste and litter bins (both trade and domestic).

**2.1.9 Trade Waste Collections**

The Council operates a Trade Waste collection service to local businesses which currently has approximately 3,200 customers, collecting around 13,000 tonnes per annum of waste plus around 1,000 tonnes of DMR via 4 collection rounds.

Trade Waste operates separately to domestic collections with a dedicated team of staff involved. The following processes are in place or are being implemented to ensure costs of service provision are covered.

1. Full automation of the administration procedures.
2. Restructure of collection rounds.
3. Including a recycling offer as part of the overall Trade Waste Service offer.

The back-office processes are now fully automated which allows the production and management of invoicing which also alerts the service to stop collection if a payment has not been made, thus ensuring that the Service does not incur any future bad debt. Historically bad debt was a major issue for the service.

The Trade Waste database will allow customers to self-serve via a portal which also alerts customers when payments are due to avoid collections being ceased.

This service is intended to offer local business an alternative to multiple private sector companies that operate within Bradford. It is entirely discretional, and any income is re-invested within the service. The annual operational costs involved are circa £3m which is forecast to be covered this financial year. Each year costs must be reviewed and adjusted accordingly to ensure the service does not make a loss.

Businesses must pay for the waste we collect from them and 2022 had been a tough year with many customers disposing of more than 200% of their contracted allowance which effectively means the service loses money and is at risk of ceasing operation. During 2023, the service revised customer contracts and suspended accounts where excessive weights were being produced. This ensured that customers paid the correct amounts for the service and the operating costs were covered.

**2.1.10 Waste electronic and Electrical Equipment (WEEE)**

Waste Services are working with Wiser Recycling Ltd to ensure correct collection, recycling, processing and disposal of WEEE takes place at our HWRCs in line with current GDPR regulations and the WEEE Directive. Residents can deposit the items below securely at HWRCs or use our website to directly arrange kerbside collection of larger WEEE items by the Contractor.

- Mobile telephones
- Electronic tablets

- Laptop, desk top computers
- Hard Drives
- Internet connected devices TV's and TV Boxes
- Games machines (Nintendo, X Box, PlayStation)
- White goods
- Large domestic appliances
- Small domestic appliances

Wiser Recycling Ltd provide suitable locked receptacles where residents can dispose of the above items at the sites. They also have a fully licensed and permitted site to store, process and recycle equipment as well as multiple other contracts to ensure compliance with the contract and all other WEEE regulations. Residents are advised to remove and delete all personal data and personal accounts before disposing of the item(s); this statement has been agreed with Legal

**2.1.11 Closed Landfill Sites (CLS)**
The Council currently manages six closed landfill sites at; Dean House Farm, Manywells, Odsal, Sugden End, Wilson Road and Sun Lane. Closed landfill sites are governed by the Environmental Permitting (England and Wales) Regulations 2016.

These sites were previously used for the disposal of domestic and industrial waste generated by households and businesses from across the District. These sites are managed internally with a specialist contractor carrying out infrastructure works as needed.

Following closure of a landfill site it may require gas control measures to be installed. Manywells and Sudgen End both have gas pumped out and burnt by a process known as 'flaring'. Flaring takes place in specially built flaring units which break down the main part of the gas (methane) into carbon dioxide and water. Methane is a potent greenhouse gas and burning it in this way greatly reduces its impact on Global Warming.

Bacteria in the buried waste cause it to decompose, producing landfill gas containing methane (CH4) and carbon dioxide (CO2). This process can last for more than 50 years. Methane has to be carefully disposed of as it is potentially flammable or explosive and is a potent greenhouse gas. It is one of the jobs of the Waste Services to ensure that landfill gas is safely managed.

All of our sites are monitored on a monthly basis and a report is sent to the Environment Agency with the data collected from the sites as required. In 2022 we started to develop a revised aftercare plan due to the sites no longer being permitted. This is an ongoing project.

It should be noted that there are over 100 closed landfill sites within the district. Almost all are commercial sites that have been closed for a long period. Waste Services are only responsible for minimal regulatory work on the six landfill sites that are owned/managed by the Council. There is no budget allocated for large-scale investigation and remediation works with any such works being assessed as required. In some cases, budgets for the sites are split between multiple departments including Asset Management, Environmental Health and even Children Services.

Odsal CLS is one of the most challenging sites at present with various historic drainage problems, local housing development and leasing issues close to the site. Prior to 1981, the culvert running under the site was known to have collapsed but as this is around 40 meters

deep, there was no option to repair or replace it. Over the following decades, various projects were carried out in and around the site which included diversion of the inlet to the culvert close to Rooley Avenue.

The site includes a leachate lagoon at the lowest point which is designed to collect any leachate and ground water, prior to it being pumped to foul sewer at Rooley Croft. The leachate lagoon also accepts any outflow from the underground culvert with any overflow from the culvert travelling via drain to a pond know as Toad Holes Beck.

The water exiting from the culvert is thought to be a mixture of ground water, leachate, Spen Beck watercourse and potentially an unknown inlet. Analysis of the water has always shown high levels of ammonia regardless of the time of year or volume of water exiting the culvert.

In 2022, Waste Services were asked by the Environment Agency to investigate the ammonia levels, although the levels had been high for many years. We worked with the Council's drainage team and a sub-contractor to investigate and found that there was no water entering the site due to the abandonment of the culvert inlet some years before. Due to the culvert depth and collapsed sections within the site, it was impossible to complete any surveys of the culvert within the site.

Investigations proved that the leachate pumping system was failing and needed to be replaced. Works were completed during 2023 which have shown a significant improvement to the system which included full replacement of the pumps, electrical systems and 500 meters of drainage.

The site now operates as originally intended, however the EA are keen for the ammonia levels to be reduced. Ongoing discussion and investigation work is required during 2024 as the volume of water exiting the culvert is too great for any form of treatment facility to be constructed, hence the original design of the site was to divert the water to sewer.

At present, we are unsure of how water from Spen Beck is entering the culvert but there have been clear signs of silt (from the neighbouring construction site) exiting the culvert, along with litter, twigs and leaves which indicate there are potentially multiple inlets to the culvert. The surface water drainage from Odsal Stadium also enters the culvert and has been known to cause significant discoloration events until early 2023 when improvement works were carried out at the Stadium.

**2.1.12 Waste & Dry Mixed Recycling (DMR) Treatment**

There are two contracts in place for the treatment of DMR and residual waste.

In October 2019, the global recycling market went into a swift decline which effectively left most DMR unsuitable for sale.

This issue resolved very slowly and the markets pricked up from April 2021 and are still at a healthy level. We do now need to provide cleaner, high quality DMR to end processors than before, with most demanding 95% quality and above.

Multiple changes to internal processing have taken place and/or are planned to ensure we have a fit-for-purpose MRF and infrastructure in place moving forward.

The delayed announcements from DEFRA are anticipated to incur extra cost for LAs with a

view to reducing waste and creating a more circular economy. These include:

- **The Environment Act** - Will give ministers the power to introduce a range of waste reforms such as extended producer responsibility, consistent collections and a deposit return scheme. DEFRA is currently working on consultation responses, which are due out early next year with the aim to help "transition to a more circular economy, incentivising people to recycle more, encouraging businesses to create sustainable packaging, making household recycling easier and stopping the export of polluting plastic waste to developing countries"
- **Simpler Recycling (formerly Consistent Collections)** will directly affect the service we provide by introducing food waste collections from all residents by April 2026. Additional fleet, staff, storage and contracts will be needed with initial estimates showing circa £3.6 needed for vehicles, bins and caddies and around £1.7m per year in operating costs. We have been allocated an initial £3.6m funding from government for this.
- **Plastic Packaging Tax** - will provide a clear economic incentive for businesses to use recycled plastic material in plastic packaging and places a £210.82 per tonne levy on producers or importers of plastic packaging if they do not include 30% recycled content. The plastic tax could encourage manufacturers and retailers to switch to compostable packaging. Councils do not have the infrastructure in place to sort and treat compostable packaging, and there is a risk that compostable packaging will contaminate plastic recycling streams.
- **Extended Producer Responsibility** - will mean that packaging producers will pay the full cost of managing packaging once it becomes waste. This will encourage producers to use less packaging and use more recyclable materials, reducing the amount of hard to recycle packaging placed on the market. Potential funding to Councils appears to be delayed until at least 2025.

A new DMR processing contract was procured and started in July 2023 and runs for five years, with Associated Waste Management (AWM) being awarded the contract. The contract is working well but still highlights that we are suffering with very high contamination levels in kerbside recycling bins.

Around 150,000 tonnes per year of residual waste are usually processed by our contractor (AWM). Throughout Covid19, this increased to circa 170,000 tonnes which has now declined to below pre-Covid levels. 2022 saw a reduction of circa 200 tonnes per week of residual waste which was believed to be partly due to the current cost of living increases combined with better bin policy compliance from residents. During 2023, we have seen further reductions of around 100 tonnes per week on average.

The waste treatment contract for the Council's residual waste commenced April 2018. This 12-year contract was awarded to AWM. At present, the contract is still working well and performance is reported to this committee within Section 3 of this report.

**2.1.13 MRF**

Our Materials Reclamation Facility (MRF) is located at the Bowling Back Lane site, in order to support processing of DMR from the kerbside. A mix of mechanical and manual picking separates out various DMR and contamination, to produce; mixed glass, cardboard, mixed papers, steel tins/can, alloy tins/cans and mixed plastics.

The levels of DMR contamination presented by residents means that we are reliant on third

party processors who have capability to clean contaminated products.

Due to the above-mentioned quality requirements increasing in 2022, our MRF is not capable of producing the required level on its own. Several trials of new machinery and market intelligence suggested a commercial-grade MRF would be needed. A business case was drawn-up to procure this with estimates of £4.5m investment needed. Unfortunately, market volatility, Covid delays, uncertainty around DEFRA guidelines from 2023 and site utility issues have prevented this project from taking place.

This delay/prevention has allowed us time to re-assess the market and our needs. Several trials of allowing raw (unprocessed) DMR to be sent directly to processors with high-end sortation equipment have proven that in-house manual picking of DMR is not the way forward for us. Without a guaranteed feedstock, a bespoke MRF would not be successful other than for reducing external spend.

Contamination of DMR at the kerbside is a major concern and awareness and education campaigns continue alongside enforcement. Recycling Advisors are a crucial role as is the Recycling Champion programme, launched during National Recycling Week (September 2018) to supplement face to face contact in every ward. Levels vary from 9% to 45% across the district with a cost of £1m plus per year being incurred.

Ongoing trials are taking place to assess whether our MRF is cost-effective and/or capable of current and future processing requirements.

## 2.2 WORK PROJECTS

### 2.2.1 Municipal Waste Minimisation and Management Strategy (MWMMS)

The Council's Municipal Waste Minimisation and Management Strategy was approved by the Executive in January 2015, and highlighted future waste policy development and the need to manage waste to more sustainable levels, by minimising waste, encouraging re-use and improving recycling at the kerbside and reducing levels of residual waste.

The Council's strategy will be revised in 2024/25 to take into account the changes from the 2025/26 and introduction of food waste collections, to ensure the Council achieves its statutory obligations and targets with the ever changing waste legislation.

### 2.2.2 Alternate Weekly Collection

Ongoing efficiency work and service improvements are being made to ensure a cost-effective service is provided to residents. Costs of vehicles, parts and fuel are providing many challenges to the service at present.

### 2.2.3 Enforcement

Enforcement of the Bin Policy is carried out in conjunction with proactive engagement and behavioural change activities with residents across the District as outlined below. The crews use In-Cab technology to log any property which does not comply with the Bin Policy or produces contaminated recycling. This information is then used to issue a Section 46 notice to the householders detailing what action they need to take to rectify this and prevent further action being taken. Where a householder continues to present uncontained waste (side waste) an overloaded bin or contaminated recycling the Council reserves the right to take appropriate enforcement action which can lead to a fine being imposed on the householder(s).

The current number of Enforcement notices which have been issued during 22/23 compared to previous years are detailed below. Figures indicate the AWC has considerably reduced side waste in Bradford but not in Keighley where it has increased, however stage two action has reduced considerably in both areas. Contamination of recycling bins and subsequent enforcement has increased on both areas.

| Bin Policy - Additional Bin / Side Waste | | 2018/19 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|
| Bradford Area | Stage 1 | 6905 | 2973 | 6137 | 1897 |
| | Stage 2 | 365 | 83 | 58 | 160 |
| | Stage 3 | | | 3 | |
| Keighley Area | Stage 1 | 415 | 760 | 664 | 490 |
| | Stage 2 | 93 | 12 | 1 | 58 |
| | Stage 3 | | | 1 | |

| Bin Policy – Recycling contamination | | 2018/19 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|
| Bradford Area | Stage 1 | 6538 | 7257 | 2738 | 6278 |
| | Stage 2 | 24 | 78 | 30 | 312 |
| | Stage 3 | | | 0 | |
| Keighley Area | Stage 1 | 1380 | 1450 | 612 | 756 |
| | Stage 2 | 10 | 15 | 13 | 21 |
| | Stage 3 | | | 0 | |

**2.2.4 Engagement & Behavioural Change**

Changing behaviours through education, engagement and enforcement is key, as is improving and introducing a systematic and consistent approach to communications across the district in respect to waste and waste management. This is achieved through a wide range of formats i.e. leaflets/posters/letters/ stickers/website/press/radio/Council APP/Facebook/Twitter/Stay-Connected and Roadshows held at events and throughout the communities.

A programme of intense and targeted marketing communications work focusses on specific areas which have been highlighted as having high levels of contamination of recycling bins by staff at the MRF.

We introduced ‘Operation Contamination’ to combat recycling contamination: our Recycling Advisors accompany the crews and check recycling bins, placing contaminated bin hangers on any bins which contain contamination advising the residents this will not be emptied until the next scheduled collection and only if the contamination has been removed. A record is made of the addresses for enforcement in the future if necessary.

Recycling Advisors then re-visit the area to post through a letter and leaflet explaining that there are issues with contaminated bins and highlighting what can go in each bin (in simple pictorial form). Monitoring then takes place for the next few weeks, combined with door knocking at properties that may not be recycling as much as they can, or are confused about

what goes in which bin. Enforcement letters are sent if the householder persistently contaminates their bin or places more than one bin out for emptying.
Results from this initiative have been very encouraging, with both crews and staff at the MRF noticing that recycling bins are not as contaminated and are generally fuller as a result of the campaign.

Information and demonstration bins are also placed in local public buildings, such as community centres and libraries to reinforce recycling messages in the target areas.

### 2.2.5 Recycling Advisors

The promotion of recycling is a vital part of reducing the amount of residual waste the Bradford District needs to dispose of. We have four Recycling Advisors who work across the District visiting households and advising them of how to manage their waste in line with the Bin Policy. This has proved to be an invaluable way of engaging with residents.

The advisors look at the households needs and advise them on how they can reduce the amount of residual waste they produce by simply recycling. They also advise on what items can be recycled. The recycling advisors also visit residents who have requested a larger 360L residual bin to ensure the household meets the criteria of 7 or more residents in the property.

### 2.2.6 Recycling Champions

As a further recycling initiative we asked for residents of the District who are interested in becoming volunteer Recycling Champions and willing to provide advice and guidance to other residents on a voluntary basis to help others to recycle more and waste less. We currently have 240 Recycling Champions signed up across the District.

Anyone who is over 18 and is interested in recycling and environmental issues can become a recycling champion – they don't need any specialist knowledge, just be enthusiastic and willing to speak to other people, put large stickers on the side of their bins which say 'Ask me about recycling', be prepared to answer any queries their neighbours may have or get in touch with the Council on their behalf to find out more. They receive:

- Training
- Bin stickers to put on the side of their recycling wheelie bin
- Annual thank you event
- Stay connected monthly newsletter
- Access to extra information or promotions
- Up-to-date information before anyone else

At the training session the champions are asked to let us know if they are also prepared to:

- Share information with any groups they are involved in e.g. faith organisations, voluntary groups, parish councils
- Give talks to local groups
- Proactively distribute information in their local area
- Assist at local events/road shows
- Give feedback about what is working well or not

### 2.2.7 Electric RCV

In 2022/23 we trialled and then purchased an electric 26 tonne refuse collection vehicle.

This has so far proven to be great value for money as well as environmentally friendly. The RCV is being used mainly around the city centre and CAZ.

Initial data shows that the vehicle performs just as well as a fuelled variant and is capable of doing two days' work on a full charge.

### 2.2.8 WRAP Service Review

We have now completed an industry specialist review (DEFRA funded) to benchmark our various service provisions, locally and nationally to ensure we are operating efficiently and following best practice. This will aid with the expected changes from DEFRA in 2025/26 and predicts the best options for service delivery which is likely to be a dedicated weekly food waste collection service running alongside revised waste and DMR collections.

## 2.3 SERVICE PERFORMANCE

Local Authority Collected Waste (LACW), formerly known as Municipal Waste, is the total amount of waste that Waste Services handles; this includes waste from domestic collections, Household Waste Recycling Centres (HWRC), street cleaning operations and trade waste collections.

Household Waste (HW) which forms the majority of LACW, is that waste which arises from domestic situations, and includes kerbside collections of residual waste and recyclates, green waste collections, bulky waste collections, and waste and recyclates delivered by residents to HWRCs. It also includes street litter collected from around the district which under Waste Data Flow is classed as household waste.

Table 1 shows the overall results from 2014/15 to 2022/23 for LACW and HW.

### Table 1 Waste Arising's

| | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|---|
| LACW (tonnes) | 222,002 | 227,350 | 227,570 | 240,442 | 235,933 | 217,778 |
| HW (tonnes) | 191,681 | 194,900 | 195,025 | 212,054 | 206,356 | 191,500 |

The increase in tonnages from 2017/18 can be directly attributed to the increased level of property growth and population within the District as shown in table 2 below.

**Table 2 Bradford Infrastructure**

| | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|---|
| Number of Domestic Properties | 215,180 | 216,700 | 218,190 | 219,140 | 219,613 | 220,710 |
| Population | 534,800 | 537,173 | 537,173 | 539,776 | 542,128 | 546,976 |

The reduction in waste arising is shown in a different way in Table 3 below. The continuation of the bin policy and the full year effect of Alternate Weekly Collections (AWC) in 2018/19 should continue to bring about an improvement in these indicators over the next few years however property and population growth will also have an impact. Unfortunately, the NI 191 total doesn't reflect this although this has reduced, the reasons are due to the definition of NI 191 and how it is calculated, and this is explained further in key performance indicators

section.

**Table 3 Kilos per Property/Person**

| | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|---|
| Kilos of Household Waste per person | 358 | 362 | 361 | 393 | 380 | 350 |
| Kilos of residual Household Waste per Household (**NI 191**) | 563 | 544 | 530 | 602 | 600 | 530 |

## 2.4 WASTE SERVICES OPERATIONAL PERFORMANCE

Residual kerbside waste has reduced again in 2021/22 compared to 2017/18 whilst kerbside recycling has increased. Garden waste kerbside has fallen despite an increase in customers subscribing to the service.

**Table 4 Kerbside Collection Performances**

| | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|---|
| All tonnes Collected at Kerbside | 146,636 | 145,388 | 143,612 | 163,754 | 154,916 | 149,100 |
| Residual tonnes at the kerbside | 108,117 | 104,061 | 101,301 | 112,504 | 108,823 | 103,460 |
| Paper & Card, Glass, Cans & Plastic tonnes | 29,536 | 34,498 | 34,767 | 42,174 | 37,330 | 36,493 |
| Garden Waste tonnes | 7,983 | 6,829 | 7,544 | 9,076 | 8,763 | 7,598 |
| Number of Properties Collected per day per round (average) | 1,727 | 1,746 | 1,559 | 1,598 | 1,571 | 1,576 |
| % rate of missed bins | 0.31% | 0.24% | 0.16% | 0.10% | 0.07% | 0.12% |

Garden waste tonnages collected at the kerbside have reduced owing to this now being a chargeable service (see also comments in item 6 below).

The bottom line in Table 4 (which was a new addition from 2015/16) is an attempt to measure the quality of the service, whose main aim is to empty bins; therefore, a measure of the level of quality could be regarded as the % of missed bins, i.e. service failure, however it is recognised that not all reported missed bins are confirmed missed bins – with the continued use of In-Cab technology the true figures will be more accurate.

## 2.5 BULKY WASTE COLLECTIONS

The bulky waste collection service continues to collect between 1,000 – 1,200 tonnes per year. The introduction of a charge for bulk waste collections during September 2013, has not affected the overall tonnages collected.

**Table 5 Bulk Collections**

| | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|---|
| Bulk Collection Tonnage | 1108 | 1,139 | 1,213 | 1,039 | 1,010 | 1,093 |

## 2.6 HOUSEHOLD WASTE RECYCLING CENTRES (HWRC)

Use of HWRCs remains high as shown in Table 6 post introduction of the resident only permit scheme in 2013.

Dry recycling shows a slight decrease however HWRC continue to show excellent levels of waste diversion before treatment.

**Table 6 Household Waste Recycling Centres**

| | **2017/18** | **2018/19** | **2019/20** | **2020/21** | **2021/22** | 2022/23 |
|---|---|---|---|---|---|---|
| Total Waste arising at HWRCs (tonnes) | 43,450 | 47,132 | 48,467 | 45,451 | 47,682 | 40,829 |
| Residual waste - sent to landfill/treatment (tonnes) | 13,571 | 16,799 | 17,047 | 17,112 | 18,444 | 16,128 |
| Garden Waste (tonnes) | 8,256 | 8,404 | 8,614 | 7,306 | 8,047 | 6689 |
| Dry Recycling (tonnes) | 16,184 | 15,801 | 15,634 | 13,756 | 13,997 | 12,656 |
| Soil/Rubble (tonnes) | 5,439 | 6,128 | 7,171 | 7,277 | 7,194 | 5,356 |

## 2.7 KEY PERFORMANCE INDICATORS (KPI)

**Table 8 below shows the KPIs for Waste Services.**

| | **2017/18** | **2018/19** | **2019/20** | **2020/21** | **2021/22** | 2022/23 |
|---|---|---|---|---|---|---|
| Kilos of residual Household Waste per Household (**NI 191**) | 563 | 543 | 530 | 602 | 600 | 530 |
| Total %waste recycled/composted including contribution from waste treatment (**NI 192**) | 35% | 39.8% | 40.7% | 37.8% | 36.1% | 38.9% |
| Total tonnes of waste to Landfill (**NI 193**) | 10,095 | 7,789 | 2736 | 2,821 | 2,973 | 1,785 |
| Kerbside recycling % | 26% | 33% | 29% | 31% | 44% | 30% |
| HWRC recycling % | 69% | 64% | 65% | 62% | 61% | 60% |
| Total waste to Energy Recovery % | 60% | 58% | 59% | 62% | 63% | 61% |
| Total waste to landfill % | 4.5% | 3.4% | 1.2% | 1.2% | 1.3% | 0.8% |

**NI 191** figures post 2016 exclude recycling, reuse or composting under the refined definition.

The net result is that NI 191 has increased because we have not been able to claim any composting tonnages compared to previous years.

**NI 192** performance is directly linked to the global recycling commodities market, environmental legislation and quality demands. Recycling performance remains below previous years despite improved recycling tonnes collected at both kerbside and via Household Waste Recycling Centres (HWRC). In addition, our waste contractor (AWM creates refuse derived fuel (RDF) instead of recycling low quality recyclates extracted from our waste, due to depressed commodity prices. RDF does not count towards recycling performance.

Due to contamination levels of recyclates running at circa 40% when presented by residents, there is a large cost of attempting to clean and segregate the material and dispose of the left over waste. Continued education campaigns have had little effect on improvement.

Alternative working arrangements and planned improvements at the Material Recycling Facility (MRF) should also see improved recycling rates in the coming years.

**NI 193** Waste sent to landfill continues to be minimal due to the nature of the treatment contract.

The Council's upstream kerbside recycling performance as shown on line 4 has increased significantly.

HWRC recycling and diversion performance continues to remain high as shown in line 3.

In line 6 waste to energy has risen significantly owing to more waste being placed to waste for energy and thus less tonnes landfilled as noted above.

## 3. REPORT ISSUES

## CONTRACTOR'S RESIDUAL WASTE TREATMENT PERFORMANCE

### Associated Waste Management Ltd – Bradford Waste Treatment Project - Executive Summary

Associated Waste Management Ltd (AWM) is pleased to submit its report for the City of Bradford Metropolitan District Council's (Council) Waste Treatment and Disposal Project (Project). AWM believes it has been well placed to meet all of the Council's objectives for the Project.

The table below reflects the performance by the waste treatment contractor in treating and disposing of the Council's residual waste.

| | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 |
|---|---|---|---|---|---|---|---|---|---|
| Waste direct to landfill | 161 | 1,477 | 135 | 179 | 261 | | | | |
| Waste to treatment | 164,951 | 167,136 | 163,762 | 154,046 | 155,383 | 132,245 | 154,376 | 168,446 | |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Waste recycled or composted via treatment | 57,014 | 24,822 | 26,075 | 17,657 | 18,850 | 17,200 | 22,027 | 37,376 | |
| Waste to Energy Recovery | 66,483 | 94,506 | 119,976 | 126,768 | 130,620 | 110,353 | 128,652 | 128,825 | |
| Total waste to Landfill (**NI 193**) | 43,139 | 39,510 | 17,711 | 9,621 | 6,048 | 2221 | 2,315 | 2,244 | |

**Treatment/Disposal Performance (in tonnes)**

Waste direct to landfill
Waste sent direct to landfill decreased in 2021/22 owing to improved availability of waste treatment facilities operated by the waste treatment contractor compared to last year. Note disposal of residual waste to landfill is always a last resort.

Waste to treatment
This has increased during 2021/22 owing to additional waste which is mainly attributed to the Covid pandemic and more people working from home.

Waste recycled/composted
There has been an increase in recycling over the previous year due to more recycling of the residual waste prior to treatment. Whilst the market has seen lower prices in commodities generally we have maintained our production through improvements to quality and reliable off takers through AWM.

Composting options still remain scarce, but we continue to work with new outlets and audit the facilities prior to use accordingly to ensure the process is robust and offers the optimum disposal BAT option for the contract

Waste to energy
This has maintained a steady level since the opening of the EF2 site, and again is welcomed as the waste is used to produce energy for the grid and provide power and jobs for the local Yorkshire community. However further tonnes have been put to waste to energy at the expense of landfill tonnages, resulting in a significant reduction in waste sent to landfill. This continued reduction in waste sent to landfill is again is to be welcomed.

The % of our waste sent to landfill was 1.5%, well within our targets set to AWM under the contract.

**Background and Energy from Waste (EfW) update:**

AWM contracted with Effinium Multifuel Energy 2 Ltd (EF2) who have built and now operate a 630,000 RDF processing facility (EF2) at Effinium power station in West Yorkshire. EF2 is a joint venture organisation ultimately controlled by SSE plc and Wheelabrator Technologies Inc, two multinational companies with extensive expertise in the fields of waste management and power generation. These same two companies also own Effinium Multifuel Energy Ltd which operates the ‘sister’ plant (EF1) alongside which EDF2 is being built at Effinium. FM1 has been operational since July 2015.

Secondarily, as a long term contingency solution, we are contracted with experts in RDF processing/export in Europe. The contracts with AVR, Andusia and Geminor guarantee access for the full volume of RDF to be produced from Contract Waste to large CHP plants in cities such as Oslo, Amsterdam and Bremen.

As a result of this structure AWM is in a position to offer the Council a solution that treats Contract Waste in an effective, efficient, economic and environmentally sustainable manner which meets and exceeds the Councils output specification and objectives, specifically to:

- Commit to the Council's turnaround targets as set out in the Performance Framework
- Guarantee diversion of Contract Waste from landfill by more than 90% with a forecast performance in excess of 95%
- Guarantee more than 6.0 % recycling rate for the Council from Contract Waste
- Guarantee a recovery rate of more than 95% with all our proposed RDF processing outlets being R1 compliant
- Continue to offer substantial added value with regards to environmental, economic and social benefits, to the district of Bradford and the Yorkshire region

AWM continues to offer a two site waste reception and processing solution both of which are fully controlled by AWM. Details of the sites and the individual technologies proposed are outlined in the table below.

| **Facilities** | **Use** | **Treatment Technology** | **Permitted Tonnage** | **Turnaround Times** |
|---|---|---|---|---|
| Valley Farm Road MRF, Stourton, Leeds | Primary facility for receipt and processing Contract Waste | Mechanical reclamation & automated separation | 450,000 tonnes | 20 minutes bulk & 15 mins RCV direct |
| | | | | |
| Gelderd Road, Leeds | Contingent facility for receipt and processing Contract Waste | | 200,000 tonnes | |

Valley Farm Road operates as a 'super MRF' and has the capacity of 450,000 tonnes per annum of mixed waste streams including Municipal Solid Waste. Like all AWM MRF plants the front end technology copes with a high throughput of materials typically running at between 45-55 tonnes per hour.

All processing post receipt of waste into the reception area is checked by a manual handling process to ensure the principal waste acceptance criteria are met. Waste is then loaded into the reception shredder and cut to a fraction size of between 270-300mm.

All waste is then subjected to a screening process to separate 2D and 3D materials and to separate small fine and organic materials from added value materials such as commodities including metals, plastics, paper fibre and inerts.
In order to process and capture materials we use a combination of screening technologies to prepare the waste streams prior to market.

The Valley Farm Road MRF plant recovers the specified materials in our solution by using the plant shown below. The other AWM MRF facilities also have installed equipment very

similar to this but utilise the principle methodology of magnetic fields, high and low pressure environments with sieve screening throughout the processes.

| Guaranteed (Bid Back) Performance Category | Guaranteed (Bid Back) Performance Levels (%) |
|---|---|
| Guaranteed Contract Waste Landfill Diversion Rate | 90.01% |

The actual diversion rate was 98.5%

AWM facilities have developed significantly over the past 10 years from simple transfer stations operating a range of recycling equipment to the introduction of bespoke and complex Material Reclamation Facilities treating a range of mixed and single stream waste streams. AWM have permits and manage planning regulations on more than 4 locations across West Yorkshire receiving more than 600,000 tonnes of mixed waste streams including MSW, C & I and C & D. Total direct landfill as a consequence of all treatment plants operated by AWM mean that less than 20,000 tonnes per annum have historically been landfilled from all incoming waste streams.
Today AWM can report that the landfill diversion for MSW and LA waste inputs is over 90% landfill diversion.

AWM have historically reported continuous landfill diversion on behalf of Bradford Council up until 2015 at 76%. Since April 2016 the diversion has increased to over 95% as reported monthly as part of Defra Waste Data Flow.

AWM can boast in 2007 the first installed combination of technology offered and used by BradMet provided in part from Holland, Germany and the UK.
During the past 14 years AWM management have seen huge advances both in technology and also Environmental Permitting, including waste management licences and risk assessments including Health and Safety, Environmental, Odour and nuisance management. The most significant aspects being the H4 Odour management protocols issued for consultation in 2011/12 requiring operators to formulate operate and correctly manage control measures for air pollution and odour migration emanating from more difficult and organic waste streams such as MSW.

| Guaranteed (Bid Back) Performance Category | Guaranteed (Bid Back) Performance Levels (%) |
|---|---|
| Guaranteed Recycling Rate | 6.01% |

The actual performance during 2021/22 was 24.62%

The MRF technology provided by AWM has been designed to recover the following key commodities;

1. Paper and Card
2. Plastic films and Rigid plastic
3. Inerts and glass
4. Ferrous Metals and Non Ferrous Metals
5. Wood

With the exceptions of Metals and Inerts the other commodities are recovered through use of mechanical and manual means. Metal recovery is achieved by way of automated and mechanical systems involving electromagnetic fields and eddy current separators using opposing fields. We have summarised the flow diagram below illustrating the component parts and capture and exit points for recovered materials. This also includes the scrap and ash recycling carried out from the RDF incineration residues arising from the Effinium sites at Ferrybridge

| **Guaranteed (Bid Back) Performance Category** | **Guaranteed (Bid Back) Performance Levels (%)** |
|---|---|
| Guaranteed Contract Waste Recovery Rate | 95.01% |

The actual recovery rate excluding landfill and recycling / compost was 99.8%

Since 2010 AWM has pioneered the export and preparation of RDF from the treatment of MSW, supplying quality CHP plants throughout Northern Europe. The plants supplied include those operated by local municipalities, state utilities and merchant plant operators.

AWM holds term contracts with several outlet companies / operators and are listed beneath.

| **Company** | **Plant** | **Contracted tonnage** | **CHP Rating** | **Term** |
|---|---|---|---|---|
| AVR | Rotterdam | 14,000 tpa | R1 | 2011-2032 |
| Andusia | Amsterdam<br>Bremen | 20,000 tpa | | 2015-2032 |
| | Oslo | | | |
| Geminor | TFS's across europe | 20,000 tpa | | 2015-2032 |

The primary RDF offtake solution is still FM2 facility operated by Effinium who work closely with AWM to ensure the Council has the best local circular solution

FM1 has an industry leading high efficiency of 31% net/thermal efficiency, scoring 86% R1 assessment using first 6 months' operational data.

The enfinium Ferrybridge 2 Energy from Waste facility received 630,000 tonnes of Refuse Derived Fuel (RDF), produced from commercial and municipal waste, shredded to less than 300mm and delivered to FM2 by road haulage.
All RDF delivered to FM2 is subject to strict quality controls and an extensive sector leading sampling and testing regime with further spot inspections taking place during unloading.

All delivered RDF is incinerated in two purpose designed water tube boilers with a moving grate floor which progresses the RDF through the boiler heat zones with temperatures exceeding 850°C in a controlled manner to achieve complete combustion with the heat produced being used to raise steam to produce electricity to power the facility and also export to the to the regional distribution network. In 2020/21, Ferrybridge 2 exported 548,000 MWh, enough to power 130,000 homes.

Incinerator bottom ash and recovered ferrous metal are removed from site by road haulier and reprocessed into construction materials and recycled ferrous metal respectively. In 2020/21, 120,000 tonnes of Incinerator Bottom Ash were taken to the adjacent Blue Phoenix

Ferrybridge facility for reprocessing and 19,500 tonnes of ferrous and non-ferrous metals were recovered for recycling.

Flue Gas Treatment takes place inside a semi-dry rector positioned downstream of the boiler, where the waste gases pass through powdered lime to reduce acid gases and also powdered activated carbon which absorbs heavy metals present in the gas stream. they pass through banks of bag filters to remove particulate matter (dust) which is contaminated with Lime and Carbon, known as Air Pollution Control residue (APCr). In 2020/21, 25,000 tonnes of APCr was taken to OCO Technology Ltd in Leeds where it is reprocessed into an aggregate product which can be used in the construction and road building industries.

Flue Gases are emitted from the 100m tall stack after they have been passed through the Flue Gas Treatment area for the reduction of harmful components. Emissions are continuously monitored for compliance with the emission limits specified in the Environmental Permit.

Bottom ash is currently contracted to Ballast Phoenix at their Sheffield site where they extract any residual metal and recycle the aggregates generated by grading the ash. This provides a valuable resource for local projects in the South Yorkshire area.

The AWM staffing figure has grown significantly (530%) since the Company formed in 2000, with the need for a more diverse, adaptable and skilled workforce.

The breakdown of our entire workforce is as follows:

28% administration & management
37% drivers
12% engineering
23% industrial pick-pack

AWM commenced a Corporate Social Responsibility (CSR) programme in 2012 that was designed and developed with sustainability in mind. To address the needs of the Social Value Act our CSR policy was developed to address three main focus areas:

- Community
- Environment
- Economic Growth

One key initiative to benefit the business and local community was a drive for each site to recruit from their local community. Our data shows that with this principle in place, 85 jobs have been created and satisfied by people from Bradford; in turn this created an additional ‘local’ salary growth of £250,000 during 2015 alone.
Not only does this increase local peoples’ work prospects but by recruiting people that live within a short distance to the facility they will be working, the carbon impact of their journey to work will also be minimised.

Once recruited, AWM then use third party training companies to enhance the transferrable skill base of our workforce to meet the needs and demands of the business. In addition to creating main stream career opportunities, AWM have also engaged in the delivery of Apprenticeships within our Engineering division. Providing young people with prospects

within vocational roles not only gives us the chance to close skills gaps but also utilise local communities as a source of labour; enhancing local peoples earning & prospect potentials.

AWM is committed to providing a quality service which supports the Council in a variety of key areas, as well as adding value to, and having a positive impact on the local communities and environment within which it operates. As an example AWM and FMFE2L have proposed two sharing mechanisms to the benefit of the Council as part of our Bid:

- AWM have guaranteed a substantial volume of income from recyclates in the financial model and this is helping to subsidise the guaranteed Waste Treatment Rate being proposed. In addition to this guaranteed subsidy AWM will share upside in excess of the guaranteed levels. The mechanism is detailed in our Financial Schedule 5 (Payment Mechanism) response but in simple terms it offers the Council the opportunity to share in upside generated either as a result of rising commodity prices and/or increased performance by AWM with regards to recyclate capture from Contract Waste.
- The gate fee incurred by AWM for RDF processing at FM2 is already substantially subsidised by guaranteed levels of power income. In addition, FMFE2L have proposed a sharing mechanism which offers the Council the opportunity to benefit from the impact of electricity prices being above specified ‘strike’ prices in the future. The mechanism is detailed in our Financial Schedule 5 (Payment Mechanism) response. The mechanism is detailed in our Financial Schedule 5 (Payment Mechanism) response.

### 3.1 Fleet Stores Facility Management Contract

It was agreed in March 2023 that we would provide annual updated on the performance of the continuation of the outsourced Fleet Stores contract. The contract had been procured to start 01/09/2023 via the YPO Framework 1117.

Fleet Factors were once again appointed as the provider, having been in place since 01/08/2018 for the previous contract period. The new contract runs for up to five years.

The contract ensures the Council’s entire fleet has a stock and supply chain of parts and consumables at a reduced-price rate in order to minimise downtime for essential services whilst maintaining value for money.

Prior to this option various others were considered. We did provide the service “in house” for a while but this was not cost effective as we didn’t have the technical expertise, systems or buying power that is available from private sector companies. There is no current proposal to return to in-house provision.

To insource all requirements, we would need a minimum of two full time employees, at least one delivery vehicle, purchase of bespoke IT systems capable of interacting with multiple national companies and databases. We would also not be able to secure the high volume-based discounts that a national company the size of Fleet Factors, are able to attain.

Estimated costs for insourcing would be at least £200k to £300k as a minimum per year, based on the above requirements. The annual cost for the contract is currently forecast to be around £900k which includes parts, staffing and administration costs. This expenditure is slightly above previous years due to inflation and general parts price increases.

| | Parts | Total price |
|---|---|---|
| 2021 | 53,533 | £ 838,783 |
| 2022 | 43,944 | £ 871,056 |
| 2023 | 44,542 | £ 889,265 |

Prices from September 2023 have ranged from £0.12 for standard vehicle bulbs to £12,000 for specialist mowing machine parts. Analysis shows that 20% of parts are 80% of the total expenditure due to being high value parts.

Fleet factors have performed exceptionally well, ensuring that:

- 92% of required items have been held in stock.
- 72% of items have been from factors rather than main dealers.
- Over 3,700 items per month have been provided.

The contract includes the supplier to work within Shearbridge Depot, providing two members of staff, all IT systems, stock control, collection and delivery of parts and specialist advice. Additionally, the supplier is to on charge the Council and “on-cost” for the management of the contract and daily operation. This is historically around 11% of contract expenditure (circa £100k per year).

## 4. FINANCIAL & RESOURCE APPRAISAL

Volatility of residual waste and recycling tonnages have financial impacts on the service budget which requires constant monitoring and management. The service has no control over market conditions and income can reduce massively with no notice. We can however minimise and/or reduce internal processing costs and share risk with processors via a gain-share agreement.

Waste legislation, property growth and resident behaviour have a direct impact on budget, as do fleet management costs in relation to such a large demand-driven service.

For the year 2022/23, Waste & Fleet Services achieved a £2m underspend vs budget. This was predominantly due to efficiencies in transport, waste acceptance and staffing costs as well as a downturn in the tonnage of waste produced by the district.

For the year 2023/24 the service is currently forecast to achieve a similar £2m underspend vs budget.

## 5. RISK MANAGEMENT AND GOVERNANCE ISSUES

This report is for information and discussion only.

## 6. LEGAL APPRAISAL

There are no direct legal implications arising from this report, however care needs to be taken to ensure that no commercially sensitive information is disclosed.

## 7. OTHER IMPLICATIONS

None Known

## 7.1 SUSTAINABILITY IMPLICATIONS

The continued increases in recyclates collected and reductions in waste to landfill contribute positively towards national and EU targets.

## 7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

The RCV fleet is now 100% CAZ compliant, including 1 x electric RCV. Further plans for Bio-methane, Electric and/or Hydrogen powered fleet are being explored.

## 7.3 COMMUNITY SAFETY IMPLICATIONS

N/A

## 7.4 HUMAN RIGHTS ACT

N/A

## 7.5 TRADE UNION

Trade Unions are updated monthly on all plans/projects within the service.

## 7.6 WARD IMPLICATIONS

There are different levels of recycling and bin policy compliance by collection round and hence by each ward. Relevant communication takes place in an attempt to increase recycling participation and reduce waste/fly-tipping.

Particular projects to reduce side waste and fly-tipping in the city centre and work with Neighbourhood Wardens has been taking place during 2022/23.

## 7.7 AREA COMMITTEE LOCALITY PLAN IMPLICATIONS (for reports to Area Committees only)

N/A

## 7.8 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

Refer to the guidance contained in the Report Guide.

## 7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

N/A

## 8. NOT FOR PUBLICATION DOCUMENTS

N/A

## 9. OPTIONS

N/A

## 10. RECOMMENDATIONS

That Regeneration and Environment Overview & Scrutiny Committee consider the information presented in this report and request a further progress report in January 2025.

That a site meeting/plant tour be arranged for the Regeneration and Environment Overview & Scrutiny Committee to visit AWM's waste processing plant at Leeds and also the Ferrybridge FM2 waste to energy plant.

## 11. APPENDICES

N/A

## 12. BACKGROUND DOCUMENTS

N/A