

Report of the Strategic Director – Place to the meeting of Regeneration and Environment Overview and Scrutiny Committee to be held on 23rd November 2021

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Subject:

Single-use Plastics, Problem Plastics and Plastic Waste: Council resource management update

Summary statement:

This report provides an overview of the approach and plans to manage the use and impact of single-use plastics, problem plastics and plastic waste by the Council and others for the District. A substantial part of the report updates members on key Government related policy and regulatory reform. This forms part of an overall approach to sustainability and clean growth set out in the Council Plan 2021-2025. It reflects on the Scrutiny Review 2018 report and recommendations.

At the time of writing key legislation was being finalised in Parliament. This has now completed and officers will update members on any significant developments at the Committee. The Environment Act passed into Law on the 10th November 2021.

EQUALITY & DIVERSITY:

Equality assessments – the adverse impact of environmental pollution is felt most by those most vulnerable in society including children, families, older people and those living with health conditions. In the case of degraded single-use plastics that are not effectively managed they can enter ecosystems and be distributed planet-wide for impact in habitats and communities far from purchase, use and disposal.

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Portfolio:

Healthy People and Healthy Places

Overview & Scrutiny Area:

Regeneration and Environment

1. SUMMARY

- 1.1 This report provides an overview of the approach and plans to manage the use and impact of single-use plastics SUP, problem plastics PP and plastic waste PW by the Council and others for the District. A substantial part of the report updates members on key Government related policy and regulatory reform. This forms part of an overall approach to sustainability and clean growth set out in the Council Plan 2021-2025. It reflects on the Scrutiny Review 2018 report and recommendations.
- 1.2 The ongoing Covid-19 pandemic, the disruption and prioritisation of the response by the Council has clearly altered the context and progress on managing many developmental challenges and opportunities. The pandemic has also seen fundamental changes to the use of materials including Personal and Protective Equipment PPE and other goods and products since early 2020. The period has also seen fundamental changes to household and retail use of products, waste and recycling. This is brought to members' attention as part of the context for this report.
- 1.3 At the time of writing key legislation was being finalised in Parliament. This has now completed and officers will update members on any significant developments at the Committee. The Environment Act passed into Law on the 10th November 2021.

2. BACKGROUND

- 2.1 Bradford Council has an ongoing concern and responsibilities for the sound management of solid, liquid and gaseous wastes. It has a range of established statutory powers and resources to manage these as an organisation and for the District to the best of its abilities and within wider pressures and demands. Single-use Plastics, problem plastics and plastic waste are a significant element of modern resource challenges and the transition to more sustainable materials and product choices.
- 2.2 There has been a significant interest and attention on the particular adverse impacts of unmanaged and ecological harmful single-use plastics especially over the last decade. This was subject to in depth scrutiny review that culminated in a report and recommendations in late 2019. Eliminating harmful single-use plastics, problem plastics generally and plastic waste is now part of a significant Government and industry agenda for change. This also falls within a wider agenda for environmental protection and ecosystem health. It is clear that every effort needs to be made to avoid adverse unintended consequences from single issue problem solving i.e. removing single-use plastics for other single use materials that cannot be recycled themselves. The approach seeks to support effective transition through no-regrets approaches for the best possible sustainable outcomes.
- 2.3 The Scrutiny process and the involvement of members, key external partners and community representatives was a major contributor to a robust review and recommendations on 'single-use plastics' for the Executive and senior management to consider and build into the ongoing work of the Council.
- 2.4 The broad agenda was reflected in the Sustainable Development Action Plan approved by Executive in March 2020 (on the first day of lockdown I). The challenges

and opportunities of addressing single-use plastics alongside the wide range of other materials across the Authority and district has been severely affected by the Covid-19 pandemic. The re-prioritisation of services and resources, Government policy and funding and the general capability of local government in England to address emerging and complex twenty first century sustainability challenges has to be acknowledged. The 'single-use plastic' issue has since been acknowledged and taken on in the new Council Plan 2021-2025 within the Sustainable District priority.

- 2.5 The adopted Council Plan 2021-25 includes a priority of how the council will enable a more sustainable district and address wellbeing, resilience and clean growth. Specifically, there is a stated aim is to *'develop a Single-use Plastics Policy and implementation plan to help the Council become a single-use plastic-free organisation by 2024.'* The broader commitment to secure a sustainable district highlights that this needs to be part of a wider agenda not only to consider problem plastics and plastic waste but also the transition to a safer, cleaner, circular, more ecological economy. This is a critical context as many current alternatives to single-use plastics and problem plastics have the potential to increase greenhouse gas emissions, alter established waste and resource management practices or create operational challenges that need to be well-thought through and proactively managed as part of overall service design and delivery.
- 2.6 Further details on key matters for this report are set out in appendices providing members with the following:
- Appendix 1: current position on addressing harmful single-use plastics, problem plastics and plastic waste within the Authority and for the District
 - Appendix 2: update on the detailed Scrutiny review and recommendations (2019)
 - Appendix 3: update on the current national Government legislative, policy and funding position
 - Appendix 4: Market developments in addressing Plastic Pollution
 - Appendix 5: District partners and key contacts
- 2.7 This is a complex and rapidly changing area of work with the Council able to take practical steps from 2021 through to 2025 in a challenging policy, funding and market context. In summary the headlines are:

Council action	District and industry	Government position
See Appendix 1 Prioritisation of single use plastics within the Council Plan (Sustainable District outcome). Cllr Firth designated as lead member champion for the issue. Jason Longhurst Strategic Director – Place senior management	See Appendix 4 Focus on working with communities and residents especially through the Recycling Team encouraging and supporting citizens and businesses to act responsibly and with positive environmental impacts.	See Appendix 3 Substantial national legislation, policy and guidance. Key aspects of the Environment Bill take on extended producer responsibility EPR and DRS Deposit Return Schemes.. When enacted this will

<p>corporate lead for sustainable development. SUP/PP/PW Immediate changes in single use plastic packaging in catering in-house and under schools contracts. Work in progress to address problem plastics within overarching environmental management and sustainability approach.</p>	<p>Ongoing changes to practices of major retailers, packaging industry and supply chains. National developments like the Plastic Pact progressing voluntary and market driven changes in material and product choices.</p>	<p>create a fundamentally different policy regime for local government, business and citizens. This also will shape other areas of environmental regulation, enforcement, pollution control and environmental quality</p>
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2.8 The Local Government Association (LGA) has been calling for waste prevention to be given equal priority with strategies to increase recycling. Avoiding waste in the first place is the best environmental outcome. The LGA welcomes the development of the waste prevention programme and the focus on reducing greenhouse gas emissions, reducing pressure on our natural environment, safeguarding resource security, creating jobs and increasing growth and the aim to move our economy from a current linear model to one that is truly circular. This aim needs to be front and centre for all government departmental policy and delivery. The LGA states that the measures described in the Consultation on Waste Prevention Plan for England (2021) go some way to achieve the overall aim of the Waste Prevention Program. The LGA sees that the work of the Plastic Pact and the impending introduction of the plastic tax will further tackle the urgent issue of **single-use and hard to recycle plastic**. The LGA remain clear that there is a significant risk remaining in ensuring the appropriate and effective infrastructure required to recycle plastic in the UK.

2.9 The LGA continues to lobby HM Government for the appropriate powers and resources for local government to better manage its own affairs and performance and to fulfil its community leadership role in social, economic and environmental wellbeing above and beyond specific areas of statutory service provision.

3. OTHER CONSIDERATIONS

3.1 The wider sustainability and clean growth ambitions for the Council have been set out in the adopted Council Plan 2021-2025. An update report for Regeneration and Environment Overview and Scrutiny Committee is currently scheduled for 21st December 2021. The shared West Yorkshire Climate and Environment Plan was approved on 22nd October 2021 and seeks to support and enable clean growth and environmental resilience.

3.2 Despite the Pandemic and the disruption caused to everyday life, businesses and organisations, it is recognised that many key partners and community groups have continued to address the use and management of single-use plastics as well as wide range of related environmental, health and socio-economic challenges. It is recognised that the Council has a key role in essential environmental responsibility, performance and impact and to be able to both lead-by-example and also enable

positive change for the District through its services and influence.

- 3.3 Nationally a range of organisations are working on this challenges including Surfers Against Sewage SAS who offer support to over 800 Plastic Free Communities and almost 3,000 Plastic Free Schools to take actions to reduce their reliance on single-use plastics. There are 9 local dedicated plastic free groups, the Recycling Team have sought permission from the groups to have their contact details on the Council's SUP (single-use plastic) web page, and in future the groups will be given opportunities to work alongside the team at future Recycling Roadshows and events. The wider network of recycling champions is being reset after over 18 months of disruption and this network will also support the work as it progresses to 2025.
- 3.4 This is a collective action challenge – with citizens and communities, but critically with companies and across supply chains. It is a trigger for innovation, investment and more effective corporate responsibility. There are new business models, products, packaging, dematerialisation and services opening up for local and national innovation. Embedding ecology and impact management into organisations and business can generate civic and market value through robust commercial leadership. This clean growth premium and ambition is central to covid economic recovery and securing a more sustainable and inclusive economy that works for everyone. Appendix 4 sets out a summary of key market developments in addressing plastic pollution.
- 3.5 Running parallel to the ultimate aim of a viable and resilient economy (with sustainable consumption and production) the development of a UK domestic circular economy is key. This forms part of the district covid-19 recovery and the existing Economic Growth Strategy. This would see an economy – locally and nationally - which designs out waste and pollution, keeping products and materials in use and actively regenerates natural systems. Such an economy will help to deliver new high-quality jobs and ensure the UK builds back better from the pandemic.
- 3.6 A Parliamentary Briefing on Plastic Waste was published in May 2021. This covered plastic waste in the UK, including statistics on plastic waste and information on the UK Government and devolved Governments' plans and ambitions to reduce avoidable plastic waste. The UK is the world's second largest producer of plastic waste (99kg per person per year) and in 2020 the UK exported around 537,000 metric tonnes - equivalent of 51% of its packaging waste.¹ As a society, we are producing and consuming quantities of plastic which cannot be dealt with solely at a national level. The waste management sector has therefore become dependent on exporting plastic waste to other countries with weaker regulations and less capacity to manage this waste in a socially and environmentally responsible manner. China has instigated a ban on accepting certain types of plastic waste. The international, human and ethical aspects of this inform the local response and underpin efforts to be as systemic and proactive as possible.
- 3.7 Bradford District's plastic collected at kerbside is processed internally to remove contamination, with the resulting product being sent to a third party (HW Martins Ltd) under a commercial contract (detailed in Appendix 1). This third party manages the final processing, quality control and sale to the recycling market as a usable resource.

4. FINANCIAL & RESOURCE APPRAISAL

Addressing single-use plastics – as part of overall environmental management – is a non-statutory function of local government. It is being addressed within the overall sustainability priority for the Council, within existing resources and service prioritisation subject to any additional public funding or external investment opportunities that may arise.

As part of strategy development and operational practices further resource and financial profiling and analytics will continue to develop to support and inform the necessary investment planning, delivery and impact management.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

There are no direct risks arising from the recommendations of this Update report.

6. LEGAL APPRAISAL

There are no direct legal risks arising from this report and its recommendations.

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

Addressing the use and impacts of single-use plastics is a key challenge amongst many facing the Council and the district. It is high-profile and reflects the challenge of developing more integrated and ecological policies, practices and performance across the whole organisation.

The approach being progress seeks to move on from solely reacting in the short-term to a single-issue that is part of a much wider need to rethink the use, purchase, management and impact of materials, products and goods across the Council.

This also extends to the Council's wider stewardship role for the District, its citizens and wider environmental quality: where statutory powers and funding may be in place or more creative and partnership approaches are necessary.

There is an emerging shift in plastics towards those derived not from hydro-carbons but from bio-materials and plant feedstocks. This means that general labels like 'single-use plastics' and calls for their elimination need to be carefully managed for clarity, throughout their lifecycle and for public confidence.

A more strategic and practical approach may be necessary than solely switching from plastic to other materials if those have the potential to have more or the same environmental and climate consequences as using plastic. Focus could therefore extend beyond replacement materials to reuse and refill practices as part of circular business models.

7.2 GREENHOUSE GAS EMISSIONS IMPACTS

There is an embedded Greenhouse Gas emissions shadow that comes through the choice, selection, purchase, use and aftercare of materials, including those that may come from hydro-carbon feedstock.

These emissions are increasingly being researched and more effectively managed through attention on Scope III emissions beyond direct or indirect emissions including purchased goods and services.

It is also important not to look at plastic reduction in isolation but rather as part of wider drive to reduce consumption of non-essential single-use items. Government should therefore look to place restrictions on all single-use items regardless of the materials of which they are made. This is because bans and levies on plastics alone may lead to business switching to paper, wood or biodegradable plastic single-use alternatives. These items may have equal, or in some cases higher, energy costs to produce and their increased use will undermine the UK's progress towards carbon neutrality. For example, switching all current consumption of plastic packaging (1.6 million tonnes) on a like for like basis, to the other materials currently used for packaging in the UK could almost triple associated carbon emissions from 1.7 billion tonnes CO₂e to 4.8 billion tonnes CO₂e. (2, 3 – as below)

7.3 COMMUNITY SAFETY IMPLICATIONS

No community safety implications arising from this report or its recommendations.

7.4 HUMAN RIGHTS ACT

No direct human rights implications arising from this report.

7.5 TRADE UNION

No direct Trade Union implications arising from this report

7.6 WARD IMPLICATIONS

The impact of decayed and uncontrolled single-use plastics affects different parts of the District and planet in different ways. Although a cross-District challenge, the impact can also be seen to adversely affect those living with existing health and underlying conditions more immediately. Hydro-carbon based plastic residues are part of wider environmental concerns for health and well-being as well as for littering and fly-tipping (as larger pieces of plastic waste). Managing solid, liquid and gaseous wastes and flows across the district is a key part of addressing sustainability and securing a clean growth city district.

7.8 IMPLICATIONS FOR CORPORATE PARENTING

No direct implications for corporate parenting arising from this report.

7.9 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

No direct privacy impacts arising from this report.

8. NOT FOR PUBLICATION DOCUMENTS

None.

9. RECOMMENDATIONS

Members of Regeneration and Environment Overview and Scrutiny Committee are asked to note the report.

10. APPENDICES

- Appendix 1: current position on addressing harmful single-use plastics within the Authority and for the District
- Appendix 2: update on the detailed Scrutiny review and recommendations
- Appendix 3: update on the current national Government legislative, policy and funding position
- Appendix 4: Market developments in addressing Plastic pollution
- *Appendix 5: District partners and key contacts*

11. BACKGROUND DOCUMENTS

Sources

- 1 From January to December 2020 1,051,836 metric tonnes of plastic packaging waste was either accepted or exported. Environment Agency. National packaging waste database (NPWDB), accessed February 2021, Available at: <https://npwd.environment-agency.gov.uk/Public/PublicSummaryData.aspx>
2. Peake, L., and Ri, J. (2020) Fixing the System. Why a circular economy for all materials is the only way to solve the plastic problem, https://green-alliance.org.uk/resources/Fixing_the_system.pdf
3. For more information on the need to tackle all single-use items read Wildlife Countryside Links briefing: Charging for all single-use items. https://www.wcl.org.uk/docs/assets/uploads/Charging_for_all_single_use_items_Link_Policy_briefing.pdf

[A sustainable district, Council Plan 2021-2025 Bradford Council](#)

[Single-use Plastics Scrutiny Review - Bradford Council Final Report - Single-use Plastics 110419 \(bradford.gov.uk\)](#)

Council resolution on Tuesday 16 January 2018

House of Commons Environmental, Food and Rural Affairs Committee – including Call for Evidence with Plastics Waste Inquiry - ongoing

[Surfers against Sewage Written Submission to EFRAC 2021](#)

LARAC Briefing notes regarding plastic waste

LGA response to Consultation on Waste Prevention Plan for England, 2021 | Local Government Association

LGA Briefing - Reducing Plastic Waste, House of Commons Debate, 8 September 2021

Behaviour change and the environment – e.g. Reducing or eliminating the use of single-use plastic | Local Government Association

Rethinking plastic packaging | Unilever

Plastic PACT - [Eliminating problem plastics | WRAP](#)

[Eliminating-problem-plastics-v3 \(wrap.org.uk\)](#) – Plastic Pact Eliminating Problem Plastics - Update July 2021

[Plastic waste - House of Commons Library](#) – Public Briefing May 2021
A House of Commons Library Briefing Paper on plastic waste in the UK, including statistics on plastic waste and information on the UK Government and devolved Governments' plans and ambitions to reduce avoidable plastic waste.

Ellen MacArthur, Wired The World in 2022, “We finally fight plastic pollution”

What are scope III emissions, Carbon Trust [Briefing: What are Scope 3 emissions? | The Carbon Trust](#)

Key terms

WRAP 2018 [Understanding plastic packaging and the language we use to describe it](#), setting out some of the terminology problems of describing plastic. In particular, the guide explains how names given to plastics do not necessarily dictate the way the plastic will behave at the end of its life, for example that the term “bioplastic” does not automatically mean it will biodegrade.

On 22 July 2019 the Government published [Standards for biodegradable, compostable and bio-based plastics: call for evidence](#) to inform better its understanding of the scientific evidence available and where there gaps. A [summary of responses and Government response](#) to this consultation was published in April 2021. In relation to oxo-biodegradable plastics, the Government said that it was minded to ban these materials, subject to further consultation.

Acronyms

DEFRA Department for Environment, Farming and Rural Affairs

DRS Deposit Return Scheme

EPR Extended Producer Responsibility

HDPE High density polyethylene

OEP Office for Environmental Protection

PET Polyethylene Terephthalate

PP Problem Plastics

PW Plastic Waste

PPE Personal Protective Equipment

SUP Single Use Plastics

WRAP Waste & Resources Action Programme

Appendix 1: Current position on addressing harmful single-use plastics, problem plastics and plastic waste within the Authority and for the District

Key issues	Actions
Work area Coordination and embedding within organisation	
<p>Confirmed ambition in the Council Plan 2021-25</p> <p>Specifically, the aim is to ‘develop a Single-use Plastics Policy and implementation plan to help the Council become a single-use plastic-free organisation by 2024.’</p> <p>This is being progressed under the wider sustainability programme and clean growth ambition.</p>	<p>Reset through 2021-22 on key headline actions.</p> <p>Dialogue with WRAP is now underway to gain advice and support on policy development and implementation (within the wider context of sustainability and clean growth)</p> <p>Develop service planning guidance, support and policy approach for 2022-23 onwards.</p> <p>Work with WRAP on district-wide plastic resource flows (in the context of clean growth and circular economy developments)</p> <p>Continue to prioritise SUP, PP and PW in Waste Service Plans and operations especially through the Recycling Team and community and business engagement.</p>
Bradford Council’s use, purchase, management and cumulative impact management.	
<p>Requirement to work across the whole organisation due to devolved decision making, service choices in goods and products and service practices.</p> <p>Some aspects of corporate single-use plastic and plastic use overseen by central policies and protocols e.g. catering, events.</p> <p>Covid-19 response On PPE, the Council has bought a significant amount of product that has featured plastic, such as that included in face coverings and masks, since March 2020. This continues as part of the necessary support to safe working practices. The Council is not now buying it directly as PPE as it is distributed by</p>	<p>Work with WRAP and other partners including single-use plastics community advocates to review and profile current practices, support the implementation planning and develop improvement plans for 2022-23.</p> <p>Develop profiling, data and information to prioritise interventions and investment for maximum positive impact.</p> <p>Example of practical response: The Trees and Woodland team have developed a process of tree planning that removes the need for plastic tree guards and sawn stakes. The new practice, called Assisted Natural Regeneration, is where we mimic nature and overplant rather than using the 5,000 plastic tree guards which would have been needed in an average tree planting season.</p>

<p>DHSC.</p> <p>Facilities Management (FM) At the peak of Covid-19 the service was providing retail type items for emergency pack-ups, inevitably this increased the use of single-use-plastics for a temporary period of time.</p> <p>Over the last year many drinks manufacturers have change from single-use-plastics for recycled plastic bottles that can be recycled, these are now being utilised in Civic Catering’s Trolley Service, Drink sales in Upper Schools and in Sports & Leisure vending machines.</p>	<p>FM - Catering Single-use-plastics have been removed from City Hall catering, either crockery is used or if disposables are required the service uses biodegradable plates, sandwich packs and wooden forks.</p> <p>In schools there has been a switch from disposables used to biodegradable plates, sandwich packs and wooden forks.</p> <p>Suitable arrangements for recycling, waste management and aftercare are being developed across the estate. Further work on this is expected 2021/22 and into 2022/23 to develop and ensure effective whole-life sustainability and joined up organisational responses to single issue interventions.</p> <p>The bulk of any single-use-plastics is where food manufacturers still pack bulk commodities in plastic packaging, though there is an increasing trend for outer packaging to be cardboard.</p>
<p>District waste and resources management</p>	
<p>The Council oversees and delivers household waste collection and processing for and across the District</p> <p>It has a partial coverage on commercial waste and premises across the District.</p> <p>Plastic processed on behalf of the Council by H W Martins, Parkside Road , Leeds. – HW Martin Waste Ltd Declaration: “We receive, for processing, Mixed Dry Recyclables from its various Local Authority clients. Within this are mixed polymers which we segregate into grades of plastic such as HDPE, PET, Pots, Tubs, and Trays. We have our own segregating, washing and flaking plant. The outputs from our plant go into facilities that specialise in the manufacture of products such as food grade containers, hard board for the Utility</p>	<p>Through Covid-19 secure service operations and planning build awareness and prioritisation on plastic flows across the District. Work to better manage resource flows and market opportunities to develop in 2021-22.</p> <p>Around 200 tonnes soft plastics collected per month</p> <ul style="list-style-type: none"> - Door to door work ongoing for previous 5 – 6 years to work with residents to improve recycling and reuse practice. Pictorial version to enhance communications. - Promoting soft recycling at supermarkets. <p>Council Trade Waste Service has the potential to expand and support business waste and resources management.</p> <p>Other providers exist across the district and this is a further avenue for collaboration and addressing the circular economy opportunities in partnership.</p>

<p>Companies, furniture and clothing. Many of the outlets are UK based businesses. “</p> <p>Litter and fly-tipping – SUP, PP and PW are every-day issues for the visible amenity and environmental quality of the District. The Council actively promotes safe, legal and responsible behaviours from citizens, visitors and organisations.</p> <p>Commercial waste. Trade Waste introduced a mixed recycling service to their customers in April 2021, overall 411 customers have taken out a recycling contract.</p> <p>LGA (September 2021) “While increased recycling is important in reducing plastic waste, the key is removing the plastic in the first place, this means targeting producers. Manufacturers of plastic packaging products are continuing to create and sell packaging that cannot be recycled and will be put in the recycling bin by people in good faith. The burden then falls on councils to not only collect it and dispose of it, but to pay the extra cost of disposing of it.”</p>	<p>Note, not all departments/depots use Waste Services for collections. This is being reviewed in line with Contract Standing Orders CSO but at present, not all will be able to follow Waste Services directions due to contractual agreements</p>
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Clean Growth and sustainable businesses

<p>Economic opportunities from business partnership and support programmes There are opportunities to explore and progress business start-ups, innovation or new commercial offerings that provide viable and robust alternative to hydro-carbon plastic use. Opportunity to progress dematerialisation, ecological materials and circular economy as part of the wider clean growth ambitions.</p>	<p>Business Support continues to feature resource efficiency and circular economy. Council works in partnership with WYCA on both business support and environmental strategy.</p> <p>Major organisations across the District (and West Yorkshire with the recently approved Climate and Environment Plan) are also addressing SUP/PP/PW</p> <p>public sector and business commissioning and procurement will continue to develop to secure more sustainable goods, services and materials choices (including accelerating the shift from hydro-carbon plastic use)</p>
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Communications, engagement and education	
<p>Waste plastic is also a major source of street littering and fly-tipping</p> <p>Degraded, harmful plastics are part of local and global ecosystem pollution.</p> <p>There is an ongoing process of public, Voluntary and Community Sector VCS and business involvement to encourage, support and enable more responsible behaviours, choices and impacts. This can also be developed beyond targeting individuals as 'consumers', working at neighbourhood and collective scales to progress sustainable development.</p>	<p>Plastic waste - House of Commons Library – Public Briefing May 2021</p> <p>Alongside general communications and engagement channels and work of the authority, direct engagement is now led by the Recycling Team and includes events, resident engagement (including house-to-house work), support to the network of recycling champions.</p> <p>It is expected that as the legislative regime changes for plastics management across England and Wales that the content and focus will develop over the next six months ahead of the next municipal year.</p>

Appendix 2: update on the detailed Scrutiny review and recommendations

Council resolution on Tuesday 16 January 2018

Single-use Plastics Scrutiny Review - *Moving towards becoming a plastic free organisation*

Recommendations	Status of these recommendations and policy endorsement recommended (October 2021)
<p>Recommendation 1 That Bradford Council commits towards becoming a Single-use Plastic free organisation by 2024 and that Bradford Council develops a Single-use Plastics Policy with Implementation Plan to assist the Council becoming a plastic free organisation.</p> <p>The Implementation Plan should be reported back to the Regeneration & Environment Overview and Scrutiny Committee in 12 months (March 2020)</p>	<p>Full Council and Executive approval of the Council Plan 2021-2025 included the Sustainable Development Priority including: We will develop a Single-use Plastics Policy and implementation plan to help the Council become a single-use plastic-free organisation by 2024.</p> <p>This is monitored through the Council Plan performance and progress reporting e.g. council plan half yearly and end-of-year performance.</p> <p>Single-use Plastics Policy and Implementation Plan for (single-use) plastic free organisation - discovery and scoping phase 2021-22.</p> <p>Further work on information provision, analytics and progress to be developed ahead of 2022-23. Multiple single-issue reports and cycles need to be set against current organisational capacity and prioritisation and integrated into more structured sustainability and corporate management.</p>
<p>Recommendation 2 That Single-use Plastics Champions be appointed: I. Council appoints a Member Champion; II. The Strategic Director for Corporate Resources appoints an Officer Champion</p>	<p>Single-use plastic member champion. Cllr Caroline Firth (Executive Assistant)</p> <p>Responsibility transferred to Jason Longhurst Strategic Director – Place</p> <p>Waste Service – Waste Services have the day-to-day responsibility for addressing critical waste and resources matters and a working with colleagues including the Office of the Chief Executive, Estates and Property (Energy Team and Facilities Management), Procurement and others to progress work on this challenging ambition.</p> <p>The Recycling Manager, Waste Service is leading the coordination and response as single point of contact officer champion, with assistance from across the authority.</p>
<p>Recommendation 3</p>	<p>Position under review 2021-22 in light of covid-secure</p>

<p>That Bradford Council Events team explore the feasibility of using water station at Council run events.</p>	<p>working practices.</p>
<p>Recommendation 4 That officers within Bradford Councils Parks Service explore and develop options for reducing the plastic used inside the Councils Parks and consideration be given to using biodegradable bags as oppose to using plastic bin liners.</p>	<p>With regards biodegradable plastic bin liners. Trials have been conducted on recycled bags and biodegradable bags, both prove suitable to use. However, officers are not convinced of the benefits to the environment of biodegradable bags which they understand could actually be far worse. With bags fragmenting, rather than degrading, they break into tiny pieces which can pollute soils, increase risk of ingestion for animals and end up in the rivers oceans and waterways. A UN report in 2016 found that biodegradable plastics do not break down in the oceans, and a 2019 study discovered that a biodegradable grocery bag could still carry a full load of groceries after three years submerged in water or buried underground. Also Biodegradable bags are not recyclable and when mixed with regular plastics they contaminate the recycling stream Current practice is to use recycled plastic bin liners rather than biodegradable ones at this time. Of note neither Greenpeace nor Keep Britain tidy are in favour of biodegradable plastics.</p>
<p>Recommendation 5 That officers within Bradford Councils Procurement team develop an objective within the Social Value Policy, which acknowledges the environmental benefit of these suppliers who are taking positive steps towards, or who have eliminated Single-use Plastics</p>	<p>The Council is working through the Procurement Strategy and practices across the authority. Work is progressing on social value indicators, based on the National Themes Outcomes and Measures (TOMs) for use in procurement processes. This is to include: Single-use plastic packaging eliminated through reusable packaging solutions or schemes (e.g. Loop or equivalent) on the contract. WYCA have also approved Social Value Themes Outcomes and Measures TOM (November 2021)</p>
<p>Recommendation 6 That Bradford Councils Procurement team, seeks to work collaboratively with Local Authorities in the Yorkshire and Humber region and the Yorkshire Purchasing Organisation, to explore the development of a requirement for recyclable or biodegradable packaging materials for the goods and products it purchases.</p>	<p>Regional guidance on sustainability / low carbon including the use of single use plastics has been produced Developments within the regional procurement and LAs networks are supporting alignment on procurement, goods and wider environmental issues like plastics pollution and greenhouse gas emissions reduction.</p>
<p>Recommendation 7</p>	<p>Engagement with the LGA on this matter continues</p>

<p>That Bradford Councils Chief Executive and Leader of the Council writes to the Local Government Association, requesting that they lobby the packaging industry to develop alternatives to plastic packaging</p>	<p>especially with regards to the new environment legislation and fundamental changes to the waste and resources policy and delivery requirements.</p> <p>LGA are pursuing this agenda in line with our commitment and continue to work with them on it Reducing Plastic Waste, House of Commons Debate, 8 September 2021 Local Government Association</p>
<p>Recommendation 8</p> <p>That Bradford Councils Procurement Team includes, as part of e-learning training materials for Bradford Council staff who undertake a procurement or purchasing role suitable content focusing on and underlining the importance of procuring ethically on behalf of the Council and minimising, or eliminating where possible Single-use Plastics from the Councils Supply chain.</p>	<p>All procurement professionals within the Council have completed the Chartered Institute of Procurement and Supply Ethical E-Learning Training for the past two years. This contributes to the Council being awarded the CIPS Corporate Ethics Award</p> <p>There is an e-learning package already on Evolve which includes SUP and this will be reviewed and updated as the Government legislation and new policy framework evolves.</p>
<p>Recommendation 9</p> <p>That officers within Bradford Councils Trade Waste service explore the options for extending the recycling offer available to Bradford Councils Trade Waste customers and for schools across the District.</p>	<p>Trade Waste offer extended through Council Budget 2020-21. Service disruption through Pandemic.</p> <p>Trade Waste introduced a mixed recycling service to their customers in April 2021, overall 411 customers have taken out a recycling contract.</p> <p>Note: this is a discretionary service that can only operate with the aim/caveat that its own operational costs are covered. This is not a trading arm aimed at creating profit. Viability/charges need to be reviewed annually.</p>
<p>Recommendation 10</p> <p>That Bradford Councils Energy Team Change and Waste Management services develop an e-learning package for all Council staff and Councillors to reinforce the key recycling messages within the Bradford Council Waste Minimisation and Recycling Policies, (other appropriate approaches should also be considered</p>	<p>Initial e-learning is already on Evolve including SUP. This is expected to be updated as legislation especially the Environment Bill becomes enacted and implementation progress in 2022</p> <p>Organisational waste management and recycling practices will be reviewed as part of the wider sustainability and environmental management developments (Council Plan 2021-2025) and linked to service planning for 2022-23 onwards. There are a range of contractual arrangements for waste and recycling across the authority and these will be reviewed as part of the overall approach.</p>

and implemented as necessary).	
Recommendation 11 That Bradford Councils Waste Service, in conjunction with Morrison's, Tesco's, major retailers and charities explores the use of plastic bottle vending machines in stores within areas where recycling rates are not high.	DRS is included in the Environmental Bill and it would be wise to wait the outcome. It would also have an impact on the plastic waste stream which the council receives an income.
Recommendation 12 That Bradford Councils Energy Team and Recycling Services explore options for greater collaborative working with organisations within the District, (including schools, businesses and local organisations), to assist in educating the citizens of the District of the importance of reducing single-use plastics and recycling as a whole.	The council is involved in outreach and engagement planning with various local environmental organisations. The Recycling Team is in contact with the 9 local Plastic Free groups and have sought permission to include the groups contact details on the SUP web page. The team encourage behavioural change in the use of SUP at the kerbside during Door Knocking and engagement work with citizens, alongside recycling and reducing waste in all waste streams. This included Recycling Week in September 2021. ASDA Keighley Recycling/SUP Roadshow 28 th October 2021. Local Plastic Free Groups in attendance.
Recommendation 13 That Bradford Councils Energy Team work with the local Refill Bradford Group and explore using Council buildings that allow public access, to be use used as a refill station	Energy Team manage utilities and utility billing and reporting. No additional staff or budget available for enhanced organisational environmental management for 2020-21. Position on refill stations to review in line with the safe reopening of council buildings 2021-22.
Recommendation 14 Bradford Council's Regeneration and Environment Overview and Scrutiny Committee to receive a report back in 12 months, which monitors the progress against all the recommendations contained within this scrutiny review	As per this report - November 2021. It is important Scrutiny members are updated on environmental and sustainability policies and planning. However, it is proposed that single issue reporting is reviewed on the basis of working strategically and smartly across this wide-ranging agenda

Appendix 3: Update on the current national Government legislative, policy and funding position

'A Green Future: Our 25 Year Plan to Improve the Environment', sets out what Government will do to improve the environment, within a generation. Updates were released on 22 October. The Defra-led 25 Year Environment Plan Board was established in December 2020. It is responsible for overseeing, co-ordinating and driving forward action across departments to implement the Plan and the Environment Bill once enacted

Minimising waste

- New policy proposals on deposit return schemes, extended producer responsibility and greater consistency in waste collections.
- New restrictions on the supply of single-use plastic straws, stirrers and cotton buds came into force from October 2020

[25 Year Environment Plan annual progress report: April 2020 to March 2021 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94444/25-Year-Environment-Plan-annual-progress-report-April-2020-to-March-2021.pdf)

Defra commentary highlights that the Government is committed to tackling the plastic waste that blights our streets, rivers and oceans. Through the Resources and Waste Strategy and Environment Bill, progress includes cutting supermarket plastic bag sales by 90% through the 5p charge, banning straws, stirrers and cotton buds and setting out plans for a deposit return scheme for drinks containers to push up recycling rates.

There were existing bans on rinse-off microbeads and the charges on single-use plastic bags.

On Marine litter, it is estimated that between 4.8 and 12.7 million tonnes of plastic enter the ocean globally every year. Government aim to eliminate all avoidable plastic waste by 2042 and deliver the Osaka Blue Ocean Vision commitment to eliminate additional plastic pollution entering the ocean by 2050.

With science estimating that plastic flow into the ocean will triple between 2016 and 2040, the UK has supported starting negotiations on a new global agreement on marine plastic litter and microplastics at the United Nations Environment Assembly in 2022.

The Environment Bill will introduce the legal framework under which ministers can more easily ban or restrict single-use plastic items. Any specific bans or restrictions could then be brought forwards under secondary legislation, allowing us the flexibility to adapt to the latest evidence available and target items that are not already covered under other policy options, such as extended producer responsibility schemes.

Other powers in the Bill cover the introduction of deposit return schemes for drinks containers to incentivise recycling, and the ability for ministers to ban or restrict the export and import of waste (including polluting plastic) between the UK and non-OECD countries.

The Office for Environmental Protection OEP will be a new, independent, statutory body. It will have the principal objective to contribute to environmental protection and the improvement of the natural environment and will hold government to account. The OEP has been operating as an interim body since 1 July 2021, and will be formally established as a body corporate shortly after Royal Assent of the Environment Bill. A Chair and Non-Executive Directors have been appointed.

The Defra-led 25 Year Environment Plan Board was established in December 2020. It is responsible for overseeing, co-ordinating and driving forward action across departments to implement the Plan and the Environment Bill once enacted

Minimising Waste (C1) Clean seas: marine litter

The most recent data (2015) suggest beach litter has continued to increase in recent years.

The most recent data (2015) suggests that the levels of plastic in fulmar stomachs have fluctuated from year to year but remained relatively constant over time.

[25 Year Environment Plan annual progress report: April 2020 to March 2021 \(publishing.service.gov.uk\)](#)

Resources and waste strategy for England

This strategy sets out how the government will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England. This strategy sets out how they plan to double resource productivity and eliminate avoidable waste of all kinds (including plastic waste) by 2050.

Our strategy sets out how government will:

- preserve our stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy
- minimise the damage caused to our natural environment by reducing and managing waste safely and carefully
- deal with waste crime

It combines actions government will take now with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan.

Government goal is to maximise the value of the resources society uses, minimising the waste created and therefore avoid emissions from the waste sector, driving towards the legal target of net zero emissions by 2050.

To achieve this, Government aim to eliminate all avoidable plastic waste by the end of 2042, and all avoidable waste by 2050. Targeting use of unnecessary single-use plastics, reducing food waste and waste crime, will maximise the value of resource use and minimise waste impact on the environment.

The Resources and Waste Strategy sets out the policies that will help achieve its vision.

The strategy contains 5 strategic ambitions:

- working towards eliminating food waste to landfill;
- doubling resource productivity;
- working towards ensuring all plastic packaging placed on the market is recyclable, reusable or compostable;
- eliminating avoidable waste of all kinds; and
- eliminating avoidable plastic waste.

It sets the framework that will help Government, businesses and the public to play their part in reducing the impact of our consumption and waste on the environment.

Government are seeking to prolong the lives of the materials and goods that we use. Our plan is to move society away from the inefficient 'linear' economic model of 'take, make,

use, throw'. A more circular economy (re-use, remanufacture, repair, recycle) will see us keeping resources in use for as long as possible. It will allow us to extract maximum value from them, then recover and regenerate products and materials at the end of their lifespan.

August 2020 - Government published their approach to monitoring and evaluating the progress of the resources and waste strategy for England.

New Waste Prevention Programme for England – Towards a Resource Efficient Economy

This aims to help Government departments and others including industry, local authorities and consumers to work together. This proposes action across 7 sectors – construction; textiles; furniture; electrical and electronics products; road vehicles; packaging, food; and plastics and single-use items. Proposals include the design and manufacture of products for optimum life and encouraging reuse, repair and remanufacturing. It is expected that the final revised Waste Prevention Programme for England may be available in late 2021 or early 2022.

Government claim to have made progress in tackling plastic waste and reducing the amount of unnecessary single-use plastic being consumed.

Following on from their ban on microbeads in rinse-off personal care products in 2018, they took action on commonly littered items by introducing restrictions on the supply of single-use plastic straws, stirrers and cotton buds from October 2020.

They are continuing to gather evidence to support further action on single-use items, including bans. They have reduced the use of single-use carrier bags by 95% in the main supermarkets since 2015 through our 5 pence charge. In May 2021, we increased the charge to 10 pence and extended it to all retailers to build on its success so far and create a level playing field for all businesses. In April 2021, we published the Government response to the call for evidence on standards for bio based, biodegradable and compostable plastics, in which we stated our intention to consult on banning oxo-degradable plastics in due course, from advice from the Hazardous Substances Advisory Committee and calls from industry.

Standards for biodegradable, compostable and bio-based plastics

Government is reviewing and considering Standards for biodegradable, compostable and bio-based plastics:

- a) the overall sustainability of bio-based and biodegradable plastic products in comparison with those made from other materials. This could include all aspects of a product's life-cycle and will help in assessing whether technical standards or other related options are suitable mechanisms to add value for such products
- b) existing relevant plastic degradation standards and how, or if, they might be promoted without any adverse effects to the environment and disposal routes
- c) the design and implementation of standards for biodegradable plastics to ensure that they fully biodegrade in a reasonable time-frame in specified environments

The Review of standards for biodegradable plastics produced by the Industrial Biotechnology Innovation Centre is referenced within the Call for evidence.

The Government has an intention to consult on banning oxo-degradable plastics in due course.

[Standards for biodegradable, compostable and bio-based plastics: call for evidence - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/standards-for-biodegradable-compostable-and-bio-based-plastics-call-for-evidence)

Extended Producer Responsibility (EPR)

Government's plan to introduce an Extended Producer Responsibility (EPR) scheme in 2023 that will see producers take responsibility for 100% of the costs of managing, recycling, and disposal of their packaging waste. The final arrangements and extent to which this embraces the 'Polluter Pays' principles are awaited (covering the full environmental cost of a product throughout its life cycle, from resource extraction to recycling and incentivising business to design products for reuse and repair).

Deposit Return Scheme

In 2018 the government committed to introduce a Deposit Return Scheme in England to prevent plastic pollution reaching the ocean and keep material within the system where it can be reused and recycled. The Environment Bill provides the enabling powers for the establishment of schemes in England, Wales and Northern Ireland. The scheme was originally due to be introduced in 2023, however this has now been delayed until late 2024 at the earliest.

In addition to the delay which will hamper the effectiveness of the DRS the government are also continuing to deliberate the idea of introducing an 'on-the-go' system which would only take bottles up to 750ml rather than a 'all-in' scheme which would accept containers of all sizes.

Introduction of Plastic Packaging Tax from April 2022 (Updated 20 July 2021)

At Budget 2017, the government announced a call for evidence into using the tax system or charges to tackle single-use plastic waste. Primary legislation was included in Finance Bill 2021 and received Royal Assent 10 June 2021.

These plans cover UK manufacturers of plastic packaging, importers of plastic packaging, business customers of manufacturers and importers of plastic packaging, and consumers who buy plastic packaging or goods in plastic packaging in the UK.

To mitigate against disproportionate administrative burdens in comparison to the tax liability for those who are likely affected, there will be an exemption for manufacturers and importers of less than 10 tonnes of plastic packaging per year.

This is a new tax that will apply to plastic packaging manufactured in, or imported into the UK, that does not contain at least 30% recycled plastic. Plastic packaging is packaging that is predominantly plastic by weight. It will not apply to any plastic packaging which contains at least 30% recycled plastic, or any packaging which is not predominantly plastic by weight. Imported plastic packaging will be liable to the tax, whether the packaging is unfilled or filled.

The tax is expected to impact on an estimated 20,000 manufacturers and importers of plastic packaging. One-off costs include familiarisation with the new rules, training for staff, registration with HMRC, and developing the required reporting framework to complete tax returns.

The rationale of this tax aims to increase the use of recycled plastic in plastic packaging and it is estimated that as a result of the tax the use of recycled plastic in packaging could increase by around 40%. This is equal to carbon savings of nearly 200,000 tonnes in 2022 to 2023, based on current carbon factors.

The policy may also help to divert plastics from landfill or incineration, and drive recycling technologies within the UK.

Government expects to evaluate key aspects of this measure including the rate, threshold and exemptions of the policy after at least one year of monitoring data has been analysed and collected.

[Introduction of Plastic Packaging Tax from April 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/introduction-of-plastic-packaging-tax-from-april-2022)

In addition to strengthening individual policy mechanisms details are awaited on the design and implementation of how they will be coordinated and brought together to be effective especially at a local authority level. Having a clear position on each policy measure is critical: ensuring joined-up policy and connection between them all and their implementation is also vital. For example, taxes must be introduced in line with the introduction of Extended Producer Responsibility (EPR) and Deposit Return Scheme (DRS), this will ensure that companies are able to retrieve the high-quality recycled material they need to make recycled products. This is not to say the introduction of a tax should be delayed but rather the implementation of EPR and DRS should be developed alongside each other.

As a result of the pandemic there are significant delays to the implementation of a number of government policies designed to tackle plastic pollution. Crucially the Deposit Return Scheme in England, Wales and Northern Ireland has been delayed until late 2024 at the earliest. This means that many of the largest producers do not have the access they need to high quality recycled materials to use for their production of truly recycled products

The House of Commons Environmental, Food and Rural Affairs Committee has undertaken previous inquiries into plastic waste and is recently asked for evidence as part of a new investigation into the topic. It outlined five areas that it would like focus on as outlined below:

- 1. What measures should the UK Government take to reduce the production and disposal of single-use plastics in England? Are the measures announced so far, including a ban on certain single-use plastics and a plastic packaging tax, sufficient?*
- 2. How should alternatives to plastic consumption be identified and supported, without resorting to more environmentally damaging options?*
- 3. Is the UK Government's target of eliminating avoidable plastic waste by 2042 ambitious enough?*
- 4. Will the UK Government be able to achieve its shorter-term ambition of working towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025?*
- 5. Does the UK Government need to do more to ensure that plastic waste is not exported and then managed unsustainably? If so, what steps should it take?*

The Committee is clear that despite growing awareness of the effects of plastic pollution, a large proportion of plastic waste is still not recycled, and the UK currently exports large quantities of plastic packaging overseas, where it may end up being managed unsustainably. The UK Government has set a target of eliminating all 'avoidable' plastic

waste by 2042, with a shorter-term ambition to “work towards” only recyclable, reusable or compostable plastic packaging being placed on the market by 2025. Measures they have announced include a plastic packaging tax, a deposit return scheme, and banning some single-use plastics, like straws. This current inquiry scrutinises the level of the Government’s ambition, whether current measures on plastic waste go far enough, and how alternatives to plastic consumption can be identified and supported.

A proposed EU Single-use Plastic Directive will ban the sale and use of many more of the most common items found on beaches including plastic cutlery, plates, balloon sticks, and food containers made of expanded polystyrene.

Local Government Association Position – September 2021

[Reducing Plastic Waste, House of Commons Debate, 8 September 2021 | Local Government Association](#)

Councils and households are working together to increase recycling rates, with plastic packaging collected by councils doubling over the past decade. Councils are ready to take on the challenge of improving recycling rates further.

[Key messages](#)

- Councils and households are working together to increase recycling rates, with [plastic packaging collected by councils doubling over the past decade](#). Councils are ready to take on the challenge of improving recycling rates further.
- While increased recycling is important in reducing plastic waste, [the key is removing the plastic in the first place, this means targeting producers](#). Manufacturers of plastic packaging products are continuing to create and sell packaging that cannot be recycled and will be put in the recycling bin by people in good faith. [The burden then falls on councils to not only collect it and dispose of it, but to pay the extra cost of disposing of it.](#)
- It is important that the Government considers recent financial pressures on local government when introducing changes to waste processing systems. Not only has the [pandemic had a devastating societal impact with councils spending more to safeguard communities](#), millions of people have also moved from working in offices to working at home, [increasing the amount of material councils are collecting from the kerbside](#).
- Councils need more clarity on how waste services will be funded under the proposed Extended Producer Responsibility (EPR) reforms. It is imperative that producers fully fund both the current waste collection and disposal costs as well as costs associated with increasing the recycling rate. The funding arising from the EPR should flow in its entirety to local government.
- Local government needs clarity about the future funding of the waste service. A Deposit Return Scheme for drinks containers, in which ever form it takes; any alterations to consistency in household waste; and changes brought about by the Extended Producer Responsibility reforms [will incur costs for local authorities](#). It

is imperative that councils are given the resources they need to implement any changes.

- How waste is collected should continue to be determined locally. Current approaches reflect a range of local factors. Most people are not constantly on the move and do not have to negotiate different local systems. Residents need to know what can be recycled, which is dependent on producers making this very clear on packaging. The current differences in the collection service consider local geography and housing types and the investment in and availability of sorting and reprocessing infrastructure. It is important that this continues.

Extended Producer Responsibility

- **As the LGA said in our response to the Government Consultation on Extended Producer Responsibility (EPR)**, producers should be responsible for 100 per cent of the costs of managing packaging waste and we support reforms to the producer responsibility schemes.
- We support higher recycling targets for producers, and these should be extended to activity that goes beyond recycling and supports the circular economy, such as promoting re-use and refill.
- EPR must address all producers, regardless of size and scale. So that everyone who is creating waste is contributing towards recycling it. We must also see an encompassing system, that covers the clean-up of littered and fly tipped packaging items.
- Councils need more clarity on how waste services will be funded under the proposed Extended Producer Responsibility (EPR) reforms. It is imperative that producers fully fund both the current waste collection and disposal costs as well as costs associated with increasing the recycling rate. The funding arising from the EPR should flow in its entirety to local government.
- The revised EPR scheme must be aligned with central **and local government's ambition to reduce carbon emissions**. We would like to see evidence that higher recycling targets have taken the impact on carbon emissions into account.

Deposit Return Scheme for drinks containers

- **The LGA is supportive of the Government's ambition to deliver a Deposit Return Scheme (DRS), as set out in our consultation response**. An effective DRS will help to deliver improved quality and quantity of recyclate. It could also be a real force for delivering behavioural change amongst consumers.
- We are disappointed that the data and models used have not been made available for us to scrutinise. In the absence of overwhelming evidence that an all-in DRS scheme (for all sizes of drinks containers) will deliver value for money, convenience for consumers and increase quantity and quality of material, the LGA supports the

introduction of an "on-the-go" DRS system. This system will target smaller drinks containers most often sold for consumption outside of the home.

- The "all in model", would be problematic at this stage. It will impact those living in flats and smaller houses disproportionately, impact families who are financially struggling due to COVID-19 and penalise car-free families while increasing transport on already busy roads. It would also result in some material inevitably leaking into the kerbside collection systems. Where this happens, councils would incur a heavy cost to process and manage this leakage.
- DRS is a collection system. It does not on its own make producers change their behaviour. DRS must be implemented in a manner which actively encourages producers to use more environmentally friendly bottles. It must not be a system which facilitates producers carrying on with their current behaviour whilst consumers pick up the cost via paying deposits.

Consistency in household and business recycling

- **Most councils are already collecting a set of dry recyclables resembling that proposed in the consistency consultation.** Where there are substantial additional costs for councils in complying with the proposed set, these should be met by new burdens funding and/or transition funding.
- Consistency cannot be applied to collections alone; it must also be a principle in the design and recyclability of packaging. The LGA maintains that producers must be the focus point of recycling reforms.
- Where local authorities are locked into contracts that will prohibit the introduction of new collection systems, the Government should work with those councils and the LGA to determine individual timelines that do not negatively impact the local authority economically or reputationally.
- How waste is collected should continue to be determined locally. Current approaches reflect a range of local factors. Only local determination can ensure the right approaches are taken in any given area.

Rejected non-recyclable material

- **Latest figures show 525,000 tonnes of household recycling collected was rejected at the point of sorting in 2019/20.** Each tonne of waste collected from a household recycling bin that can't be recycled attracts an extra cost of around £93 to dispose of through an energy from waste facility. This equates to over £48 million per year in additional costs.
- Contaminated recycling is costing councils a great deal of money. **Oxford City Council found that recycling has increased three-fold in the last 3 years** with 6.5 per cent of recycled material rejected since April 2020 due to contamination. Other authorities such as City of Bradford Metropolitan District Council have reported a **15 per cent rise in recycling contamination** in some areas during the

pandemic. A report shows that the additional costs for collecting and processing this waste in comparison to pre-COVID levels is around £208,000 per month.

- We are calling on the manufacturers of non-recyclable packaging to front the costs associated with this sorting and disposal. Residents, councils, and the Government are working together to reduce plastic waste and achieve Net Zero, yet manufacturers are still producing materials that they know cannot be recycled which is misleading to some residents doing their best to be vigilant when it comes to recycling.

Environment Bill, Report Stage, House of Lords, September 2021

Local government is already prioritising environmental goals, including leading the way towards achieving net zero carbon, increasingly with ambitious plans to achieve this before the Government's 2050 target.

- Local government wants to see measures that reduce the amount of unnecessary and unrecyclable material becoming an issue in the first place. We welcome the commitment for retailers and manufacturers to pay for recycling and disposing of packaging and household waste. This is a crucial stage in shifting the cost away from the taxpayer and back to the polluter. The Bill must set out clearly that producers will be required to pay the full net costs to councils.
- Following the delay to the progress of the Bill, councils and the waste industry also need urgent clarity on the timetable for implementation of the Government's waste and recycling reforms. We support the principle of a consistent set of core materials to be collected in household recycling. However, how these materials are collected should remain a local decision.
- The Bill sets out a high-level framework for the separate collection of waste material streams for recycling, with the detail to be determined through regulations. It is positive to see that the Government has committed to ensuring these regulations are laid before parliament. The LGA would welcome this taking place through affirmative procedure, to allow for sufficient scrutiny.
- The Bill points to a new environmental relationship between local and national government, with potentially greater responsibility sitting with councils. The impact of this is that councils will have a new environmental improvement role within their localities. Local government is well placed to take the lead on this agenda but to deliver on these ambitious plans they will need to have appropriately skilled staff and be given adequate resources.
- At this stage it is difficult to predict the impact of the legislation and the costs for local authorities in meeting their new statutory duties. It is imperative that any new duties on councils are accompanied by sufficient funding to allow them to deliver on these new duties, and that this is kept under review as the high-level proposals in the Bill move into the implementation stage.

Amendment 8, tabled by Baroness Jones of Whitchurch, would introduce a target for reducing plastic waste and single-use products.

- This amendment would create mandatory targets for reducing plastic and single-use products. While WRAP (Waste & Resources Action Programme) has taken welcome action in setting voluntary targets, mandated requirements would offer greater accountability and compliance.
- The LGA supports this amendment as it works to reduce the amount of plastic waste that councils are required to process. Councils spend £852m per year on waste collection and efforts to reduce financial burdens are welcome. In addition, this amendment will help enshrine a reduction in plastic use which in turn will assist in delivering on net zero goals.

[LGA Response to Consultation on Consistency in Household and Business Recycling in England | Local Government Association](#)

Compostable and biodegradable plastic cannot be recycled through household waste infrastructure. These items have the potential to confuse consumers and so messages on non-recyclability must be clear and consistent. Government should also work with manufacturers of compostable and biodegradable materials to remove these products from the household waste stream at least until the infrastructure required to manage these materials is properly in place. In the meantime, further Government guidance on the collection and disposal of compostable and biodegradable materials is welcomed.

[LGA response to Consultation on Waste Prevention Plan for England, 2021 | Local Government Association](#) – as previously referenced.

Appendix 4: Market developments in addressing plastics pollution

Dame Ellen MacArthur WIRED The World in 2022

“...Many businesses and governments have set ambitious targets and taken action to address plastic waste and pollution, not least through the Ellen MacArthur Foundation’s Global Commitment and Plastics Pact network. These two initiatives alone unite more than 1,000 organisations behind a common vision of a circular economy for plastic, in which all the plastic items we don’t need are eliminated, the ones we do need are designed for reuse, recycling or composting, and those that we use are kept in the economy and out of the environment.

Initiatives such as this have begun to deliver change among market leaders. Their use of recycled content in plastic packaging is increasing and these companies have committed to significantly reduce use of virgin plastics by 2025. This means that fossil resources are being left in the ground, and plastic is being used again and again. Some big businesses have also piloted successful packaging-reuse models. This includes Danone, which is working closely with Loop by Terracycle to provide some of its food products in returnable jars, and Unilever, which is trialling “refill on the go” for washing-up liquid and detergent in Chile, and for its Sedal shampoo brand in Mexico.

However, voluntary commitments can only do so much. To scale these efforts globally and across industries in order to end to plastic waste and pollution, more organisations must take urgent action. Building on important work carried out under the Canadian G7 and Japanese G20 presidencies in 2021, the G20 agreed to engage fully in upcoming UN discussions on how to take further decisive measures. A treaty is the next necessary step and will provide the framework for building capabilities and institutional mechanisms, and for increased international co-ordination to solve this crisis. As a global policy framework, it will underpin sectoral, regional and national action plans, and support implementation. The beginnings of a global treaty in 2022 will harmonise policy efforts, enhance investment planning, and stimulate innovation and infrastructure development for a world free of plastic pollution.”

Eight problematic or unnecessary single-use plastics were to be eliminated under The UK Plastics Pact by the end of 2020. *The eight to be eliminated are disposable plastic cutlery; all polystyrene packaging; Cotton buds with plastic stems; Plastic stirrers; Plastic straws; Oxo-degradables that break down to create microplastics; PVC packaging; and disposable plastic plates and bowls.* Nineteen other single-use plastic items are being investigated to look at ways of reducing their environmental impact through avoidance of their use, redesign, reuse and/or smarter recycling. For each, PACT members will be required to develop and adopt solutions to address the issues associated with them through reuse, redesign *and/or smarter recycling - by 2025. These include single-use drinks bottles, non-detectable black plastic packaging which doesn’t get picked up in the recycling process, and a range of flexible plastics and films in everyday use.* (Source: [Eliminating problem plastics | WRAP](#)).

There are significant changes happening across major companies and supply chains that are changing products, markets and the wider situation for all of this work. The UK Plastics Pact, led by WRAP, is the first of a global network of Pacts, enabled by the Ellen MacArthur Foundation's New Plastics Economy initiative. The network has four targets to 2025:

- Eliminate problematic or unnecessary single-use packaging through redesign, innovation or alternative (reuse) delivery model.
- 100% of plastics packaging to be reusable, recyclable or compostable.
- 70% of plastics packaging effectively recycled or composted.
- 30% average recycled content across all plastic packaging.

The "[Plastics Industry Recycling Action Plan](#)" (PIRAP), an industry action plan which includes: increased collection of recyclable plastics; improved sorting; and developing end markets for recycled plastics.

The "[UK Circular Plastics Network](#)" (UKCPN), which aims to bring together plastic product users through a programme of networking and knowledge-sharing events.

Through commercial redesign, Unilever is "completely rethinking the role of plastic" in their business and plans to halve the amount of single-use plastic it uses by 2025:

- Halve the amount of virgin plastic used in their packaging and achieve an absolute reduction of more than 100,000 tonnes in plastic use
- Help collect and process more plastic packaging than they sell
- Ensure that 100% of plastic packaging is designed to be fully reusable, recyclable or compostable
- Increase the use of post-consumer recycled plastic material in their packaging to at least 25%.

Appendix 5: Information for residents and businesses including key District partners and key contacts

<p>Bradford Council</p> <p>www.bradford.gov.uk</p> <p>Single-use plastics Bradford Council</p> <p>Council social media including Facebook and Twitter</p> <p>The Council also uses a range of face-to-face and community engagement events and activities, especially through the Waste Service Recycling Team.</p>	<p>Recycling and waste monthly Bulletin to 42,000 subscribers featuring information on recycling and reducing waste, including SUP.</p> <p>During covid contact with Recycling Champions diminished but contact will be resumed in the lead up to the recycling Christmas campaign.</p>	<p>Bradford Environment Forum</p> <p>c/o Cnet</p> <p>Bradford Environment Forum CNet Bradford</p> <p>Civil Society and Voluntary Sector network of environmental organisations</p>
<p style="text-align: center;">Eliminating problem plastics WRAP</p> <p style="text-align: center;">This national programme is addressing:</p> <p>Flexible plastic packaging - Flexible plastic represents a quarter of all UK consumer plastic packaging, but only 6% is currently recycled. Key retailers and supermarkets are now offering the chance to recycle these in store.</p> <p>Problem plastics - Eliminating problematic plastics and rethinking and redesigning our plastics so they are more easily recycled.</p> <p>Designing for recyclability - Use our polymer choice and recyclability guidance to design packaging fit for the future</p> <p>Citizen behaviour change - Hard hitting campaigns, world leading citizen research and insight are transforming recycling behaviours in the UK.</p>		
<p>Plastic Free Communities</p> <p><i>Over 800 community networks tackling single-use plastic from beaches & green spaces all the way back to the brands and businesses who create it.</i></p>	<p>Plastic Free Businesses</p> <p><i>Plastic Free Business Toolkit to help local, independently owned businesses achieve our Plastic Free Champion Award.</i></p>	<p>Plastic Free Schools - Surfers Against Sewage</p> <p><i>Pupil led education programme equips and empowers young people with the tools to create positive, lasting environmental change.</i></p>