

ITEM 7

PAPER NO. WRWA **879**

WESTERN RIVERSIDE WASTE AUTHORITY

MEETING	15 th July 2019																
REPORT AUTHOR/DATE	General Manager (Contact Mark Broxup - Tel. 020 8871 2788) 5 th July 2019																
SUBJECT	Report on articles by the Daily Telegraph and Greenpeace Unearthed.																
CONTENTS	<table><tr><td>Page 1</td><td>Introduction</td></tr><tr><td>Pages 1 to 5</td><td>Items reported on</td></tr><tr><td>Page 5</td><td>Recommendations</td></tr><tr><td>Pages 7 – 13</td><td>Appendix A – Letter 24th June 2019</td></tr><tr><td>Pages 14 -20</td><td>Appendix B – Letter 25th June 2019</td></tr><tr><td>Page 21</td><td>Appendix C – Letter 26th June 2019</td></tr><tr><td>Page 22</td><td>Appendix D – Website statement</td></tr><tr><td>Page 23</td><td>Appendix E – Trade press statement</td></tr></table>	Page 1	Introduction	Pages 1 to 5	Items reported on	Page 5	Recommendations	Pages 7 – 13	Appendix A – Letter 24 th June 2019	Pages 14 -20	Appendix B – Letter 25 th June 2019	Page 21	Appendix C – Letter 26 th June 2019	Page 22	Appendix D – Website statement	Page 23	Appendix E – Trade press statement
Page 1	Introduction																
Pages 1 to 5	Items reported on																
Page 5	Recommendations																
Pages 7 – 13	Appendix A – Letter 24 th June 2019																
Pages 14 -20	Appendix B – Letter 25 th June 2019																
Page 21	Appendix C – Letter 26 th June 2019																
Page 22	Appendix D – Website statement																
Page 23	Appendix E – Trade press statement																
STATUS	Open																
BACKGROUND PAPERS	None																

This page has been left blank intentionally.

INTRODUCTION

1. This report describes the events surrounding the publication of articles by the Daily Telegraph and Greenpeace Uearthed on operations at the Authority's Materials Recycling Facility which is operated by Cory Riverside Energy.

PRE PUBLICATION

2. At 11:47 am on Friday, 21st June 2019, the Authority received an email from an investigative reporter at the Daily Telegraph who had been investigating how recyclate is processed with Uearthed, Greenpeace's investigative unit.
3. The reporter said that they had received information that recyclate processed by the Authority was heavily contaminated, which meant that it is likely that it cannot ultimately be recycled. In light of this information, and in order to fully investigate these matters, an undercover reporter had been employed at the Materials Recycling Facility (MRF).
4. The reporter's email then set out several areas of concern about which it was the Daily Telegraph's intention to publish, in a forthcoming edition, highlighting what it believed to be failures in the systems designed to recycle household waste at the MRF. The email then raised seven questions that the Daily Telegraph wished to be responded to by midday on Monday, 24th June, so that it could reflect the Authority's position.
5. At 16:01 pm on Friday, 21st June, a very similar email was received from a Greenpeace Uearthed reporter with a deadline of 4pm on Monday, 24th June, to respond to the questions. The letter, attached as Appendix A to this report, was sent to both reporters at 12:34 on Monday 24th June, the Daily Telegraph having agreed to extend its deadline.
6. Cory Riverside Energy and the constituent councils also received similar emails from the two reporters on Friday, 21st June.
7. At 15:42 on Monday, 24th June, the Daily Telegraph asked a further set of nine questions with a deadline for response of 10am on Tuesday, 25th June. The letter sent in response to those questions is attached as Appendix B to this report.

8. At 15:15pm on 26th June, a further question was asked by the Daily Telegraph with a response required by 6pm and the letter sent in response to that question is attached as Appendix C to this report.

CONSTITUENT COUNCILS

9. On the morning of Monday, 24th June, Authority officers suggested responses for the constituent councils and answers to the specific questions they had been asked. All members of the Authority were also informed of the responses that Authority officers had made to the reporters.
10. On the afternoon of Monday, 24th June, Cllr Harcourt from Hammersmith & Fulham (H&F) emailed to say that H&F was very concerned by the allegations being made and asked that the topic be put on the agenda for this Authority meeting. H&F were concerned in particular about low recycling rates and the allegations around poor working conditions.

POST PUBLICATION

11. Articles appeared in both the online and print versions of the Daily Telegraph on Wednesday, 26th, Thursday, 27th, and Friday, 28th June. Greenpeace Unearthed also published an article online on Wednesday, 26th, and Friday, 28th June.
12. On 27th June 2019, the Chairman emailed the lead members for the environment in each of the constituent councils attaching the Authority letters (attached as appendices to this report), together with a response that appeared on our website, (attached as Appendix D to this report), and informed them he and the Authority's officers would fully assist with any inquiries that they would like to undertake.
13. The original article was subsequently repeated in online versions of the Metro and Daily Mail. Two online trade journals, 'Letsrecycle' and Materials Recycling Weekly, published follow up articles during the following week and the comments attached as Appendix E to this report were given in response.

MONITORING PROCEDURES

14. Authority officers monitor the tonnages delivered by the constituent councils and the results of each day's random sampling programme. All this data (including photographs and details of the contamination found in the samples), is then made available online to the constituent councils on the next working day.
15. If particular constituent council vehicles consistently deliver highly contaminated loads then additional checks are made, outside of the randomised sampling regime, including whole load checks to ascertain what might be the cause of this contamination – again, all the results and photos are sent to the constituent council concerned.
16. Officers (and occasionally councillors) from the constituent councils also periodically monitor the sampling procedure and visit the MRF.
17. Authority officers monitor all MRF inputs and outputs on a monthly basis, checking that the sampled level of contamination broadly matches the tonnage of MRF Rejects that go for energy recovery. If the two figures are out of balance it either means good recyclate is being lost or the quality of the recyclate is being compromised. In 2017/18 the figures were within 1% of each other.
18. Officers also monitor the tonnages and value of recyclate that are sold in line with the profit-sharing mechanism within the WMSA. Authority officers do not measure things like pick rates, instead they monitor the effectiveness of the overall process as measured by the principal outcomes, i.e. that good quality recyclate is produced that commands prices above market averages.
19. The Authority and Cory Riverside Energy (CRE) submit all relevant data to the Department for Environment, Food & Rural Affairs (via 'WasteDataFlow') and the Environment Agency, respectively.

WELFARE MATTERS

20. Health and Safety has always been a priority for both the Authority and CRE and performance is monitored closely at contract meetings. It is also the primary focus of the joint meetings held with constituent council collection contractors.

21. CRE staff welfare matters are not specifically monitored by Authority officers, but officers are based on site and are continually in and around all operational areas, including the MRF. Over 5,000 children and adults visit the MRF annually and officers are not aware of any concerns about staff welfare being raised previously. The Authority, CRE and ALS Managed Services (CRE's MRF staffing provider) all have their own established 'Whistle Blowing' policies and procedures.
22. The waste industry is unfortunately, by its very nature, not the most pleasant working environment, but all employees are provided with appropriate clothing and personal equipment. The MRF is co-joined to the main riparian waste transfer station and the presence of rats is therefore an unavoidable hazard, but appropriate control measures are in place. Other pests and insects are also well managed, but it is impossible to eradicate them completely as they are largely delivered to site by the collection vehicles.
23. The MRF's staff locker rooms are directly above the MRF Education Room which is used every weekday during the school term and, whilst there have been a number of incidences of water ingress from above, Authority officers have never witnessed any insect infestations.
24. The Health and Safety Executive and the Environment Agency both inspect the site regularly and they have never raised any concerns with respect to staff welfare.

RECYCLING RATES

25. Only around 87% of the co-mingled recycling delivered to the Authority by the constituent councils is recyclable, the other 13% being contamination (i.e. material that should have been put in the General Waste stream). 99% of the good recycle received – nearly 60,000 tonnes a year – is then successfully processed at the MRF to be sent to reprocessors for recycling in the UK or Europe.
26. As reported elsewhere on this agenda, Paper No. WRWA 882, the Authority is launching a new "What Happens to your Recycling" campaign to provide reassurance to residents that the materials they put out for recycling are actually being recycled. This campaign will run alongside the existing "End of the line for Waste" waste minimisation campaign and the schools education programme.

27. The Authority successfully recycles or composts around 99% of the material delivered to it by the constituent councils and, whilst the overall household and recycling rate is around 25%, individual constituent council performance does vary from around 22% to 30%.
28. The reasons why the overall recycling and composting rate of the constituent councils is lower than that of other authorities is well documented. It is generally accepted that recycling performance is more difficult to achieve in areas such as those served by the constituent councils, with high population densities and a large proportion of high-rise properties and flats.
29. However, despite those difficulties, the constituent councils' performance with respect to dry recyclate (e.g. glass, cans, paper, card, plastics, cartons) of around 22% compares favourably with other English collection authorities which averaged around 23% in 2017/18.
30. The headline recycling and composting figures are heavily skewed by the volume of household waste that goes to composting. The urban character of the constituent boroughs means that there are relatively few gardens and, consequently, the composting of garden waste in the constituent councils only accounts for around 3% of household waste, compared to an average of around 19% for English collection authorities as a whole. This difference in garden waste arisings is the main reason why the constituent councils appear to be poor performing when in fact they are not.
31. The Authority also recycles around 27% of the general ("black bag") waste stream that goes for energy recovery by removing metals from the bottom ash before recycling the bottom ash itself, and the Anti Pollution Control Residue, into aggregate and building materials for use in the construction industry. The recycling of this material does not count towards official recycling figures in England, but it does in other countries.

RECOMMENDATIONS

32. The Authority is recommended to:
- a) instruct its officers to assist fully with any reasonable inquiry by the constituent councils (individually or collectively) into the matters covered by this report; and

b) otherwise to receive this report as information.

M. Broxup
GENERAL MANAGER

Western Riverside Transfer Station
Smugglers Way
Wandsworth SW18 1JS.

Western Riverside Waste Authority

General Manager: Mark Broxup

Western Riverside Transfer Station,
Smugglers Way, Wandsworth, LONDON SW18 1JS

Telephone: 020 8871 2788 E-Mail: info@wrwa.gov.uk
Web: www.wrwa.gov.uk



Contact: Mark Broxup

To: Direct Dial: 020 8875 8888

Claire Newell - claire.newell@telegraph.co.uk Date: 24th June 2019

Emma Howard – emma.howard@unearthednews.org

Dear Claire and Emma

Thank you for your inquiries into how our recycling is processed. Western Riverside Waste Authority (WRWA) is the statutory body charged with managing the waste and recycling collected by the London boroughs of Hammersmith and Fulham, Lambeth and Wandsworth and the Royal borough of Kensington and Chelsea.

WRWA is committed to ensuring that the waste and recyclables delivered by its constituent councils is managed in a safe and environmentally responsible manner. We are proud that the Materials Recycling Facility operated by Cory Riverside Energy (CRE) recycles 99% of the recyclable material it receives and that the non-recyclable material it receives is sent for energy recovery rather than going to landfill.

WRWA is completely open about how material is recycled and it hosts tours for teachers and children daily during term time as well as guiding around 500 local politicians and residents a year around the Materials Recycling Facility (MRF), including areas where your reporter worked. WRWA's tonnage, sampling and financial data (including what they charge the constituent councils per tonne for each material type) is freely available in the public domain, as is information on how each commodity type is managed.

Unfortunately, despite extensive publicity and education campaigns, an average of around 15% of the material put out by the residents in our area as being recyclable material is in fact contamination i.e. material that they should have put in the general or "black bag" waste stream. A small proportion of this contamination can be categorised as being genuine errors by residents or an over expectation of what the MRF can do however, the vast majority of contamination is simply caused by a small but persistent proportion of residents deliberately putting black bag waste into the recycling stream. This is evidenced by your reporter who witnessed items such as "nappies, sanitary items and toilet brushes, as well as food and garden waste" – unfortunately we could provide many more such example.

We know around 15% of the MRF input is contamination because random samples from each borough are taken daily and then comprehensively analysed but, equally importantly, we know that less than 16% ends up being sent for energy recovery. The fact that the incoming contamination and the outgoing residual waste tonnages from the MRF are almost identical is important for two reasons; firstly it shows that the good recycle put out by our residents is being recycled and

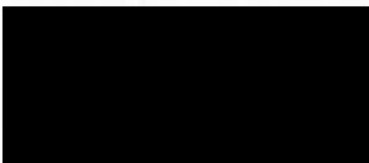
secondly that the contamination isn't going out with the finished products. WRWA knows, through its mechanisms for sharing in commodity values with CRE when markets are buoyant, that the prices that Cory achieve for the final products are consistently above the market averages published on trade websites.

All the outputs from the MRF are processed either in the UK or Europe and if, on occasion, Cory can't find reputable markets then the material is sent for energy recovery with WRWA's agreement. In reality this situation only really applies to two waste streams, "plastic sacks" and "pots tubs and trays" and the problems with markets for those waste streams is well documented.

We share your concern that UK material is being exported to Malaysia and other countries in the Far East and not being managed correctly and we commend Greenpeace for highlighting these issues. We are aware that a recycling sack from Hammersmith & Fulham and a sack from Kensington and Chelsea were found on a Malaysian site last October but we genuinely do not believe that the sacks passed through our facilities to get there. Our constituent councils distribute hundreds of thousands of sacks annually and we do know that they can find their way into commercial waste streams. We were also encouraged that in depth study 'The Recycling Myth - Malaysia and the Broken Global Recycling System' produced by Greenpeace Malaysia in November 2018 did not identify any material from any of the four boroughs.

If you would like to come along and see the MRF in operation for yourself, please just let me know and we'll be very happy to organise that for you.

Yours sincerely,



MARK BROXUP
GENERAL MANAGER

Enc.

With respect to your specific questions of us we would respond as follows:

1. *Do you agree that the company's targets incentivise workers to remove recyclable items from the conveyer belt and put them in "general waste"?*

This is inaccurate.

All incentives at the MRF are focused on safety and then maximising the amount of material that gets recycled. That's why we can report such high rates of recycling and of those materials that can be recycled, more than 99% of them are successfully recycled reflecting a very effective 'end to end' process.

With regard to picking targets, these are common industry practice and the MRF's are in line with the machinery manufacturer's guidelines.

Pick rates are not controversial nor hidden. Quite the opposite. Signage is prominently displayed in cabins to indicate the anticipated pick rates.

In addition, CRE work hard to establish and maintain a culture at the MRF that is the opposite of what is alleged. CRE introduced a "quality counts" campaign in March 2019 to ensure workers understood the importance of only removing contaminants from the recycling stream and CRE regularly monitors and reviews the quality of contaminants picked by MRF workers. Regular review meetings with Team Leaders, Shift Supervisors and management teams ensure information regarding the quality of material picked from the line is communicated to workers.

If a worker's performance does not reach the expected, reasonable, levels by a significant degree or on repeat occurrences, then Cory raise a Corrective Action Notice (CAN). A CAN provides a brief record of discussion that performance has fallen below expected levels and provides an opportunity for improvement. Cory will continue to conduct audits to ensure that standards are met.

2. *Do you agree that adverse working conditions including sequential evening and morning shift-work and inadequate training may impact on workers' ability to adequately sort recycle?*

We dispute these allegations in the strongest possible terms and do not believe working conditions are adverse.

We are satisfied that Cory's shift work complies with the Working Time Directive, and having one work break of nine hours in a week is also in line with this, provided all other requirements for breaks are respected.

Training is rigorous and more than adequate and we are confident that the working conditions at the MRF compare favourably with any other similar facility. This is why the MRF can deliver such excellent results and high standards as evidenced by the fact that more than 99% of what can be recycled is recycled.

3. *Given that managers closely monitor employee's work to see if they are hitting targets, why do they not tell them to stop throwing away recycling or adjust targets to take into account of how much material is on the line waiting to be processed?*

Pick rates are only one metric and we take into consideration a number of other factors in assessing performance as we work towards the high recycling rates the MRF achieves.

These factors include:

- Machinery Throughput/Performance
- Density of material
- Inbound and outbound sampling
- Visual inspections of materials and cabins
- Equipment defects and failures

CRE makes it clear to workers that they should not throw recyclable materials into waste bins.

Ideally, all recyclable materials would have been properly cleaned and sorted before arrival at the MRF meaning there would be less reliance on hand picking of contaminants.

4. *Is it correct that Cory is contracted by the Western Riverside Waste Authority to run the Smugglers Way MRF in Wandsworth, as well as four other recycling facilities along the Thames?*

No this is not correct.

CRE is contracted by WRWA to run the MRF and a household waste and recycling centre in Smugglers Way, Wandsworth.

It does however operate four waste transfer stations and a reuse and recycling centre along the Thames. Two of these are on behalf of the WRWA, They are Western Riverside and Cringle Dock.

Waste transfer stations take non-recyclable black bin bag and commercial waste from trucks and transfer them to barges where they are ferried down the Thames by tug, to Cory's energy from waste plant. In doing so, 100,000 vehicle journeys are removed from London's congested streets each year.

5. *On the Cory Energy website, it states that "due to the high performance of the MRF, residents in the WRWA boroughs can be assured that c 87 percent of the co-mingled recyclate which is sent to the facility is ultimately recycled". Given what our reporter witnessed, do you stand by this statement?*

The MRF at Smugglers Way is one of the highest quality, best-run and most modern recycling facilities in the country and we are very proud to be able to commit to our local residents that c. 87% of mixed household recycling sent to the facility is ultimately recycled.

This is backed up by solid, irrefutable data audited by the Environment agency.

The exact percentage fluctuates depending on how much contaminant there is in the materials received by the MRF.

For instance in 2017/18 the figure for the amount of contaminated waste received was 13%.

In 2018/19 it was 15% and data so far for the 2019/20 reporting period, shows that 12% was contaminated.

What we can reassure local residents of is that more than 99% of the material that reaches us in a condition which means that it can be recycled (for example, uncontaminated by food or other unrecyclable materials) is successfully processed and sent for recycling.

Therefore residents can be confident that, when they take the time and effort to clean and sort their recyclables, this time is not wasted.

Nevertheless, it is the case that a percentage of the waste that reaches us is contaminated or unrecyclable and we are continuously working hard to reduce this further.

In 2019/20, the WRWA has already budgeted to spend £155,000 on advertising campaigns for local residents, to encourage them to recycle more. This is in addition to our constituent councils' individual advertising campaigns.

6. *In light of the problems that staff at the MRF experienced with the chute not working, how do you ensure that your machines are adequately maintained to ensure that recycle can be processed?*

One of the reasons CRE can achieve such high recycling rates is the thorough maintenance and cleaning standards that are well above industry norms, and of which we are very proud.

Plant and sortation equipment is cleaned thoroughly twice a day, which compares very favourably to the industry standard of one thorough cleaning each week.

CRE do this to minimise contamination and ensure that we maintain the highest quality product for recycling. These high standards have additional health, safety and welfare benefits and further reduce the risk of fire. The MRF also has a planned preventative maintenance programme (PPM) which covers all plant and equipment.

CRE also has a range of third-party contractors that maintain specific plant and equipment such as the optical sorting units and MACH Screens (used to sort cardboard out of the other recyclable streams) and this work is covered by strict service level agreements which focus on the machines working at their optimum to maximise the quality of the recycle.

On a reactive basis, for breakdowns and blockages to chutes, Cory has an electrical/mechanical engineer dedicated to each shift per day and a team of other internal engineers who are familiar with the MRF.

7. *How much do you receive from the councils to sort the recycling at the MRF? Given what the reporter found when working there, do you think this represents value for money?*

The rates per tonne that WRWA charges its constituent councils are set annually. The latest budget paper can be found here:

<https://wrwa.gov.uk/wp/wp-content/uploads/2019/01/WRWA-870-Budget-report.pdf>

The charges align with the waste hierarchy perfectly. No waste means no charge so minimising and reducing waste is always financially and environmentally the most attractive option. In 2019/20, co-

mingled recycling is charged to the constituent councils at £28 per tonne and Residual Waste is charged at £150.50 per tonne.

There is also mechanism in the contract with CRE whereby WRWA (and subsequently the constituent councils) share in the value of recycled material above a threshold but, due to depressed commodity markets, no such income has been received since July 2018. However, between September 2016 and 2017 £465,000 was credited to the constituent councils via this mechanism.

8. *Do you agree that a significant volume of the recycling in bales is contaminated and therefore less likely to be recycled?*

No. This is inaccurate and we disagree in the strongest possible terms.

There will always be some level of contamination in the bales and these levels are reported to the Environment Agency in accordance with our reporting obligations under the MRF Code of Practice.

The sorted, packaged recyclables are sold to a range of licensed and accredited recyclers, all of whom are in the UK and Europe. The fact that CRE is able to sell these materials for higher than market average rates demonstrates that it is of high quality and how favourably the MRF's output compares to the rest of the industry.

9. *Do you agree that the presence of rats is not only a health hazard for staff, but also makes it likely that some recyclable – especially paper or cardboard – maybe too contaminated to be recycled?*

The Health, Safety and welfare of all staff that work on providing services to us is our highest priority. The MRF is regarded in the industry as one of the best in the UK and so far this year we have had a series of visits, including from four of CRE's competitors, foreign delegations (at the request of the HSE) and of course the HSE to review CRE's health, safety and wellbeing practices. This is part of CRE's ongoing and open engagement with the industry to constantly improve. In the last three years CRE has had just one reportable H&S incident. CRE will only be satisfied when incident rates are at zero, nevertheless their record compares well to an industry average of 2.6 reportable incidents over the same period. This in part, is why we have so many industry visits to the site.

Pests are unfortunately an unavoidable part of the waste management and recycling industry and the inference that any pests have a detrimental effect on the amount of materials recycled is spurious, as evidenced by the fact that more than 99% of the materials reaching the MRF, which can be recycled, are recycled.

Most pests are introduced via external deliveries (i.e. council recycling collection vehicles) as a result of food waste or other contamination in the recycling. The close proximity of the MRF to open water also means that the incidence of pests, particularly vermin, is more likely.

This is one of the reasons why we go to such great lengths to encourage residents to only put the correct material out for recycling and to give food-contaminated recycling such as tin cans a quick rinse before putting them out for collection.

CRE's pest control services are covered under contract and the contractor is required to provide services to the site on an agreed frequency (one visit per month). In addition, they are available to respond as within a 24-hour period should a pest control issue be identified.

The pests controlled are rats, mice, cockroaches, flies and general crawling insects.

CRE follow HSE guidance to minimise the risk that pests present to our workforce. Rats present a risk of Weil's disease. MRF workers and other CRE employees are briefed specifically on the risks of Weil's Disease as part of their induction. Also part of the induction, workers are provided with Standard Operating Procedures (SOP) and Risk Assessments specific to the work they will be undertaking. These include:

- wearing protective clothing such as gloves
- following good basic hygiene including regular handwashing and avoiding hand to mouth/eye etc contact
- taking rest breaks, including meals and drinks, away from the work area;
- washing cuts and grazes immediately with soap and running water; and
- covering all cuts, abrasions and other breaks in the skin with waterproof dressings and/or gloves

Western Riverside Waste Authority



General Manager: Mark Broxup

Western Riverside Transfer Station,
Smugglers Way Wandsworth, LONDON SW18 1JS

Telephone: 020 8871 2788 E-Mail: info@wrwa.gov.uk
Web: www.wrwa.gov.uk

Contact: Mark Broxup

Direct Dial: 020 8875 8888

Date: 25th June 2019

Claire Newall - Claire.newell@telegraph.co.uk

Dear Claire,

The Western Riverside Waste Authority (WRWA) will continue to help its constituent councils in their efforts to comply with the waste hierarchy by:

- reducing the overall tonnage of residual waste and recyclables they deliver to WRWA;
- delivering a greater percentage of that tonnage for recycling; and
- reducing the amount of contamination they deliver with their recycling.

WRWA will continue to ensure, via its contractual arrangements with Cory Environmental Limited, trading as Cory Riverside Energy (CRE), that:

- as much of the recycling it receives is correctly separated in the Materials Recycling Facility (MRF) and able to be sent for recycling (currently c99%);
- if markets cannot be found for recyclable material in the UK or Europe, or there is a doubt about how ethical the available outlets might be, that material is sent for energy recovery rather than risk causing harm (currently c0.5%);
- energy is recovered from the residual waste and contaminated materials it receives, rather than sending it to landfill (currently 100%); and
- in managing the residual waste and recycling, CRE and its sub-contractors comply with all relevant laws and regulations and the health, safety and general welfare of workers is of paramount importance.

We are obviously deeply concerned by the matters you have raised but have been unable to substantiate any allegations of impropriety by CRE, or its sub-contractors, from the limited information you have supplied.

WRWA's constituent councils do an enormous amount to help their residents recycle as much material as correctly as possible. We believe the systems and processes we have in place are working effectively and we hope that your article will not lead to residents believing that their efforts are wasted and stop recycling as a consequence – that would be a very poor environmental outcome.

Please find answers to your detailed questions attached.

Yours sincerely,



MARK BROXUP
GENERAL MANAGER

- 1) You say that “a small proportion of this contamination can be categorised as being genuine errors by residents or an over expectation of what the MRF can do however, the vast majority of contamination is simply caused by a small but persistent proportion of residents deliberately putting black bag waste into the recycling stream”. Whilst our reporter did see general rubbish including nappies and sanitary items, they also saw full black bin liners full of waste. On several occasions, these were split or broken, with items spilling out. Do you agree that the presence of these black bin bags full of waste is likely to have led to contamination just as much as “residents deliberately putting black bag waste into the recycling stream”?

These black bin bags will have ended up at the MRF as a result of householders or businesses incorrectly including them with recycling collections in either wheelie bins or large communal bins - either intentionally or accidentally.

This is particularly a problem in high-rise buildings where recycling is placed into large (1,100 litre) communal bins. It is not unusual for residents to incorrectly place non-recyclable waste in with recyclables.

In contrast, bags which are left for kerbside collection are less likely to be incorrectly picked up, as refuse collectors are better equipped to know the difference between clear bags of recycling and black bags of residual waste.

This is corroborated by a study by the London Waste and Recycling Board in April 2019, which found that contamination levels in recycling materials collected from high-rise flats averaged 30.7% “with some much higher”.

<https://www.letsrecycle.com/news/latest-news/lwarb-project-low-recycling-rate-flats/>

Conversely, loads from low rise properties can have contamination rates as low as 2 or 3%.

- 2) You say that if a worker’s performance does not reach the level expected, they are issued with a Corrective Action Notice. How many of the CANs issued in the last year relate to workers putting recycling in the “general waste bin”?

In the first instance, Cory Riverside Energy (CRE) will deal with performance issues in

an informal manner, speaking with workers if they have put the incorrect material in the bin or are missing quality picks. All performance-related communications are strictly confidential, as you would expect in any workplace. CEL only rely on a Corrective Action Notice when absolutely necessary.

CEL's current staffing provider ALS was appointed in March 2019 following a tender process as the contract with the previous supplier was up for renewal. The previous contractor did not operate the CANs system, but rather a similar process which was based on a traffic light system. In total, 27 'orange' traffic light warnings (the equivalent of a CAN) were issued in the final nine months of the incumbent's contract.

Since ALS took over responsibility for agency staff at the MRF in March 2019, eight CANs have been issued. Six of these have been for non-performance on the picking line.

3) You say that 99 percent of the material that reaches us is in a condition which means it can be recycled. Given this statement, how do you account for the instances where staff working at the MRF put recyclable material – including unopened recycling sacks containing recycling items – in the “general waste bin”? For your information, the Telegraph and Uearthed have footage of staff at the MRF putting unopened sacks of recycling in the general waste bin, as well as recyclable material. This will appear alongside the story.

To clarify, c. 87% of the material we receive is in a condition where it can be sent for recycling. Of this 87%, c.99% is then successfully processed by CEL and sent for recycling to markets in the UK and Europe.

There are a number of legitimate reasons why it might appear to the untrained eye that a worker has put a bag of recyclables into a bin. CEL's workers are trained to be able to quickly identify material that may contaminate the recyclables. In this instance, they may have recognised contaminants within the bag or indeed black bin liners inside the clear ones as appears to be the case in both of the examples included in the clip that you have provided. If this were the case, the worker was taking the correct course of action and deserves praise rather than censure.

Indeed, if you review the full clip the worker in question demonstrates other correct behaviours. They are behaving correctly and responsibly throughout, minimising

health and safety and contamination risks. For example, they clearly pick up and examine a bottle which contains liquid, causing it to be correctly thrown into the waste bin.

4) You claim that 87% of mixed household recycling is ultimately recycled. How is this figure audited by the Environment Agency?

To clarify, c.87% of the material which is delivered to the MRF by the constituent councils can be sent for recycling.

Out of this recyclable material that is received (i.e. the 87%), **99% of this is ultimately sent for recycling**, following processing at the MRF.

CEL is required to provide input and output sampling data to the Environment Agency on a quarterly basis. It is important to be absolutely clear that this is a reporting frequency, not a sampling frequency. Sampling of the materials at the MRF takes place every day in a dedicated sampling unit.

CEL report in line with the Material Recycling Facility code of practice, which forms part of the Environmental Permitting (England and Wales) Regulations 2016. CEL's operating license is contingent on compliance with this.

In addition, the Environment Agency has audited CEL's sampling procedures, and the WRWA, the constituent councils and other local authority customers also audit them on a regular basis. All of these audits have found CEL to be fully compliant

5) You claim that that 99% of material that reaches us in a condition which means that it can be recycled - is recycled. On what basis is this figure calculated? Is this figure audited by the EA?

Yes, this is correct - 99% of the materials which reach the MRF in a recyclable condition are sent for recycling.

This information is based on the regular checks and measurements that we carry out. All material is weighed coming into the MRF and going out. All these figures are reported to the EA by CEL.

In addition to this, multiple daily samples of the incoming material to measure its

quality and composition are taken. CEL also sample material which is sent for recycling in line with the MRF code of practice as outlined above. All of CEL's sampling procedures have been audited by the Environment Agency.

6)

- a. Multiple experts say recyclable material placed by pickers in the mixed waste bins in the MRF, will be immediately contaminated. Do you agree with this claim?**

No we don't agree with this claim. The materials that come into the MRF, at the very beginning of the process, are mixed together, as they are in the constituent council trucks delivering them to the MRF, so contamination could happen there.

Any recyclable material that may inadvertently be placed into a mixed waste bin does not automatically become contaminated because it depends what other materials are in the bin.

In addition, when there is capacity at the MRF, CEL can carry out reprocessing of the contents of the waste bins to make sure that as much is being recycled as possible.

- b. Do you know how much material which was originally recyclable is placed in pre-sort waste bins?**

No but we would guide you to the figure that we have already disclosed which is that c99% of what can be recycled is successfully sent for recycling. From this arithmetic it is fair to draw out that 1% of material that was originally recyclable ends up in waste bins.

- 7) You say you regularly monitor and review the quality of contaminants picked by MRF workers and refer to "inbound and outbound sampling" saying information is shared with workers. We found no evidence of this. What do you sample and how often is information shared?**

CEL report quarterly to the Environment Agency, in line with the Material Recycling Facility code of practice. This forms part of the Environmental Permitting (England and Wales) Regulations 2016. CEL's operating license is contingent on compliance with this. In addition to the required quarterly reporting to the EA, CEL also sample the materials at the MRF on a daily basis.

The results of this sampling are shared with Team Leaders at weekly meetings. The Team Leaders then use this information to focus on specific materials/cabins - it is at this point that the information is communicated with workers as and when required.

If your reporter was not informed of the sampling data, this is most likely because they were working in a cabin where action was not required to improve the quality of a particular material. In total there are seven sorting cabins in the MRF, several of which deal with specific items.

8) You say that not all material sent for recycling is ultimately recycled in which case the material is sent for energy recovery. WRWA pointed to “plastic sacks” and “pots, tubs and trays” as waste streams which have been sent for incineration. What % of total processed recyclate was this in 2018?

Due to adverse market conditions in 2018 for the two materials identified (plastic sacks and pots, tubs and trays), at times there were no credible end markets. WRWA and CEL are very mindful of our broader duty of care, which includes due diligence as regards the companies our materials are sent to. Therefore CEL will not send any of our materials to companies who they feel may not process it in an environmentally responsible manner. CEL also has a policy of not sending any materials outside of Europe.

Therefore, a proportion of these materials was sent for energy recovery in 2018. Of the total inputs into the MRF that year, the combined percentage of the above materials sent for energy recovery was 0.59%.

9) You say you report bale contamination levels - could you provide us with this data?

We can't share this data because it is commercially sensitive. The reason for this is that the quality/purity data of the bales is a key part of CEL's fee negotiations that they go through with the recyclers who buy the product.

What we can say is that the fees that CEL can command are above market rates, which reinforces the fact that the quality of the output from the MRF and the processes by which CEL create that output, are very high.

Western Riverside Waste Authority

General Manager: Mark Broxup

Western Riverside Transfer Station,
Smugglers Way, Wandsworth, LONDON SW18 1JS

Telephone: 020 8871 2788 E-Mail: info@wrwa.gov.uk
Web: www.wrwa.gov.uk



Contact: Mark Broxup

Claire Newell - Claire.newell@telegraph.co.uk

Direct Dial: 020 8875 8888

Date: 26th June 2019

Dear Claire,

Please find the Authority's response to your question below:

"It's been drawn to our attention that government data shows that WRWA is one of the worst performing local authorities with only 24.2 percent of household waste between 2017 and 2018 being sent for reuse, recycling or composting. Please let me know if you'd like to comment on this?"

WRWA is a disposal authority and it recycles or composts all of the material it receives for that purpose from its constituent councils who are the collection authorities (the distinction between a disposal authority and a collection authority is of obvious importance). The overall household and recycling rate is around 25% but our individual councils performance varied from around 22% to 30% in 2017/18.

The reasons why the overall recycling and composting rate of the constituent councils is lower than that of other authorities is well documented. They are central London boroughs with very high population densities and a large proportion of high rise properties and flats. It is generally accepted that recycling performance is more difficult to achieve as a consequence of these factors.

Despite those difficulties, the constituent councils' performance with respect to dry recyclate (e.g. glass, cans, paper, card, plastics etc.) of around 22% compares favourably with other English collection authorities who averaged around 23% in 2017/18.

The numbers are heavily skewed by the volume of household waste that goes to composting. The urban character of the area means that there are relatively few gardens and consequently the composting of garden waste in the constituent councils only accounts for around 3% of household waste compared to an average of around 19% for English collection authorities as a whole in 2017/18. The difference in garden waste volumes is the single most important factor in explaining why the constituent councils appear to be poor performing when in fact they are not.

Yours sincerely,

MARK BROXUP
GENERAL MANAGER

RECYCLING IS NOT THROWN AWAY!

Residents' recycling is not thrown away - 99% of what can be sent for recycling is sent for recycling!

This Authority is aware that the Daily Telegraph and Greenpeace Unearthed have recently published articles calling into question whether the recycling material collected from the residents of its four constituent boroughs; namely, Hammersmith & Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea, is being processed correctly.

This Authority is concerned that these articles will cause residents to lose confidence in the system, which could have a negative impact on household recycling rates in the boroughs. The Authority and the boroughs spend considerable resources encouraging residents to recycle as much and as accurately as possible and residents can be confident that their efforts to separate out clean, dry and targeted recyclables are not wasted. This is because around 99% of the material we receive that can be recycled is sent to recycling processors to be made into new products. **Please do not stop recycling!**

Unfortunately, a small number of residents do not use the recycling system correctly and place general rubbish in with the mixed recycling, such as soiled nappies, food waste, garden waste and many other items. We communicate regularly that we can currently only recycle the following: paper, cardboard, plastic bottles, glass bottles and jars, cans and pots, tubs and trays.

This rubbish, mixed with the recycling, can amount to around 13% of the total tonnage delivered. We separate it out and send it for energy recovery. **ALL but around 1% of everything else is sorted and separated into different material types and sent to reprocessors in the UK or Europe;** that's nearly 60,000 tonnes of recycle each year.

This Authority is completely open and transparent about the workings of the Materials Recycling Facility which is operated by its contractor, Cory Riverside Energy, and it is visited by more than 4,000 children and around 1,000 adults each year (including community groups and councillors). We invite any resident or local group to come along and see for themselves how we sort their recycling. Check our website here to book yourself a tour: <https://wrwa.gov.uk/schools-adult-groups/adult-groups/>

WRWA RESPONSE TO DAILY TELEGRAPH AND GREENPEACE UNEARTHED ARTICLES

We are concerned that the articles published by the Daily Telegraph and Greenpeace Unearthed will cause our residents to lose confidence in recycling, which could result in a negative impact on household recycling rates. We spend considerable resources encouraging residents to recycle as much and as accurately as possible, and we want all residents to be confident that their efforts to separate out the clean, dry and targeted recyclables are not wasted.

We are confident that our Materials Recycling Facility (MRF), which is operated by Cory Riverside Energy, is one of the most modern and well-run in the country, and we are proud that c87% of the material we receive is sent for recycling. Cory does not send any recyclables outside of Europe.

As we all know, a small number of residents do not use the system correctly and place residual waste in with their recycling. This residual waste can amount to around 13% of the total tonnage delivered. We separate it and send it via the river Thames for energy recovery.

In the first instance, our priority should be to reduce the waste we produce. However, where this is not possible we should always aim to reuse or recycle. The solution requires a joined-up effort involving recycling and waste management companies, local authorities, national policy-makers, householders and the companies that manufacture the products which ultimately end up in our recycling and waste streams.

We are proud to be completely open and transparent about the workings of our Materials Recycling Facility. It is visited by more than 4,000 children and around 1,000 adults each year, and we extend our invitation to anyone who wants to see it for themselves.

Mark Broxup
General Manager
Western Riverside Waste Authority