

Paper No. WRWA **24-13****WESTERN RIVERSIDE WASTE AUTHORITY**

<b>MEETING</b>	29 <sup>th</sup> July 2024
<b>REPORT AUTHOR/DATE</b>	Interim General Manager <i>(Contact Rachel Espinosa - Tel. 020 8871 2788)</i> 15 <sup>th</sup> July 2024
<b>SUBJECT</b>	A Report outlining progress with operations and other matters since the previous meeting of the Authority.
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<b>STATUS</b>	Open

<b>BACKGROUND PAPERS</b>	DEFRA. National Statistics. Local Authority Collected Waste Management Annual Results 2022/2023.  Alfred H Knight. Western Riverside Waste and Recycling Composition Analysis 2020-2023
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## **EXECUTIVE SUMMARY**

1. This paper brings Members up to date on operational and other matters, which, in themselves, do not warrant the production of a separate paper. The majority of these matters are for Members' information, but where approval is sought, this is referred to in the report and summarised at the end. The specific matters covered in this report are:-
  - a) Operations
  - b) DIY Waste
  - c) Performance Monitoring
  - d) Waste Composition 4-Year Summary Report
  - e) Waste From Households Data for England for 2022 and 2022/23
  - f) Emissions Trading Scheme Consultation Update
  - g) Simpler Recycling, Deposit Return Scheme (DRS) And Extended Producer Responsibility (EPR) Updates
  - h) WRWA Response to Battersea Power Station Planning Application
  - i) Evening Standard article on WRWA And CC Recycling Performance
  - j) Smugglers Way HWRC User Satisfaction Survey
  - k) Recruitment Update
  - l) Members Visit
  - m) Advice And Support Contract Re-Procurement
  - n) Government financial support for food waste treatment
  - o) Abandoned Vehicle Agreements
  - p) Revision of Authority Codes
  - q) Constituent Council New Recycling Initiatives
  - r) Items costing between £5,000 and £30,000
  - s) Comments of the Treasurer

## **RECOMMENDATIONS**

2. It is recommended that the Authority:
  - a) Agree to continue with current arrangements for the receipt of DIY waste by residents arriving in cars at the Smugglers Way HWRC;
  - b) Increase the scope of waste composition surveys and review the frequency in advance of the planned implementation of the Emissions Trading Scheme for Energy from Waste;

- c) Approve the draft response to the Emissions Trading Scheme consultation, which ends on 2nd August, attached as Appendix B;
- d) Review the Abandoned Vehicle Agreement with the Constituent Councils in advance of its expiry on 31<sup>st</sup> March 2025; and
- e) otherwise receive this report as information.

## **OPERATIONS**

- 3. Since the last Authority meeting, operations at Cringle Dock have been running smoothly but Smugglers Way has been affected by two MRF plant break downs.
- 4. On 18<sup>th</sup> March 2024, disruption was caused by the breakdown of the MRF Crane. Authority officers requested that Lambeth's dedicated Recycling vehicles be diverted to the Cringle Dock Transfer Station from 7.34am, with the same request for Kensington and Chelsea's split back vehicles from midday. The MRF crane was operational from mid-afternoon with usual Borough tipping arrangements resuming the following day.
- 5. A further breakdown in the MRF took place on 19<sup>th</sup> April 2024. At 8.33am, officers requested that Lambeth's Recycling deliveries be diverted to the Cringle Dock Transfer Station for the remainder of the day with normal tipping operations resuming on the following working day.

### **Replacement of Crane No. 1 – Smugglers Way**

- 6. It is a requirement of the WMSA that Cory replace both Smugglers Way cranes within the lifetime of the contract. Crane No. 2 was replaced in 2008, and in April 2024, Cory submitted a planning application for the replacement of Crane No. 1.
- 7. The application details a crane that is solely electric, replacing our current fuel-powered existing crane. The new crane will revert to the Authority on completion of the contract.
- 8. Once planning approval is received, it is anticipated that the dismantling of the current crane and installation of the new crane will be completed by Autumn 2024. Officers will work with Cory to ensure minimal disruption to operations during this period.

## **RECEIPT OF INDUSTRIAL WASTE (DIY TYPE WASTE)**

9. At the February 2024 meeting of this Authority (Paper No. 24-04), officers updated Members on the requirement of the Controlled Waste (England and Wales) (Amendment) (England) Regulations 2023, which came into force on 31<sup>st</sup> December 2023.

### **Industrial (DIY) Waste delivered to the Transfer Station in a Van**

10. Prior to 31<sup>st</sup> December 2023, residents delivering DIY waste in a van would have been charged for all of the DIY waste delivered.
11. The new legislation required that all local authorities accept a certain amount of DIY waste from residents for free and so, with effect from 31<sup>st</sup> December 2023, if a resident wishing to drop off DIY waste in a van completes a booking form and produces Photo ID on arrival, the Authority will accept at no charge, up to:
- 100 litres of DIY waste per week, or
  - one large item no bigger than 2m x 0.75m x 0.7m i.e. one bath tub, one door or one kitchen unit
12. The introduction of these new arrangements has run very smoothly with all deliveries by residents arriving in a van inspected on arrival, and the allowances applied. The Smugglers Way and Cringle Dock facilities have received 108 deliveries of DIY waste in the first four months of this year.

### **Industrial (DIY) Waste delivered to the HWRC by car**

13. Unlike some other authorities, prior to 31<sup>st</sup> December 2023, residents in the WRWA area had been permitted to drop off small quantities of DIY waste for free if delivered in a car, an amount considered more generous than the amounts required by legislation.
14. Procedures in place required monitoring of HWRC usage by officers which would highlight those residents attending the Centre very regularly. Follow up queries with those residents would establish the nature of the waste they were delivering. Should they have been delivering significant quantities of DIY waste, they would be advised that they would be required to pay for any additional deliveries of DIY materials, but could continue to deliver unlimited amounts of Household Waste. This system ensured that businesses were deterred from dropping off their waste at the HWRC free of charge, as opposed to paying for disposing of it at the adjacent Smugglers Way Transfer Station.
15. At the February Committee meeting, Members approved that, rather than restrict residents to the levels determined by legislation (see paragraph 11

above), the Authority would continue with current arrangements for the receipt of DIY waste by residents arriving at the HWRC and request officers to report back to Members at the next Committee meeting, highlighting any increase in DIY type waste delivered to the HWRC, compared with the same period in 2023 in order to reconsider this approach if necessary.

16. It should be noted that HWRC staff do not inspect loads on arrival at the Centre and Authority officers are not currently monitoring usage of the HWRC to determine significant DIY usage. The Centre has controls over usage via the booking system and the height restriction which deters the use by businesses arriving in vans.

17. Members will find a comparison of DIY waste tonnages in comparable months in 2022, 2023 and 2024 below.

Month	Waste Wood	Rubble
Jan-22	228.96	80.30
Feb-22	164.36	62.92
Mar-22	244.80	93.84
Apr-22	255.90	131.08
May-22	236.58	130.26
	<b>1,130.60</b>	<b>498.40</b>

Month	Waste Wood	Rubble
Jan-23	161.28	68.54
Feb-23	193.00	78.88
Mar-23	193.04	80.40
Apr-23	241.82	131.08
May-22	286.24	139.18
	<b>1,075.38</b>	<b>498.08</b>

Month	Waste Wood	Rubble
Jan-24	195.10	51.88
Feb-24	179.44	51.58

Mar-24	227.30	67.82
Apr-24	257.90	83.30
May-22	284.94	136.24
	<b>1,144.68</b>	<b>390.82</b>

18. Whilst the contents of the Hardcore and Rubble container will certainly be considered DIY waste, the Waste Wood tonnages should be viewed with some caution as a significant percentage of this tonnage will be Household Waste in nature i.e. residents would be asked to place their broken wooden furniture in the Waste Wood container, as well as their garden fencing and decking. General Waste tonnages have been excluded from this comparison as officers believe that the majority of that waste will be Household in nature.

**Hardcore and Rubble:**

19. Members will see that, whilst Hardcore and Rubble tonnage figures for the January to May 2023 period compared against the same period in 2022, saw a minimal decrease. Comparison of the tonnage for January to May 2023 against the same period in 2024, shows a 21% reduction in arisings.

**Waste Wood:**

20. Members will see that there has been an increase in Wood Waste tonnage. If we compare the tonnage for January to May 2022 against the same period in 2023, there was a 5% reduction in arisings. However, when comparing the same period in 2023 against 2024, there was an 6% increase in arisings.
21. Officers recommend that the Authority agree to continue with current arrangements for the receipt of DIY waste by residents arriving in cars at the Smugglers Way HWRC and report any increase in tonnage figures for Hardcore and Rubble and Wood Waste to the September Authority meeting in order to reconsider this approach if necessary.

## **PERFORMANCE MONITORING**

### **Introduction**

22. Detailed tonnage tables are attached as an Appendix to this report. The modelling to forecast the outturn figures for 2024/25 compares performance against the corresponding period in the previous year. The tables shown set out:

- a) the tonnages of each waste type (including co-mingled recycling contamination) delivered by each constituent council in the current financial year up to 31<sup>st</sup> May 2024, together with projected outturn tonnages, compared against those budgeted for and the previous financial year's outturn; and
- b) comparisons of the tonnages of each major waste type handled by each constituent council on an annual basis.

### **Points to Highlight**

23. If the trend in the overall level of waste arisings from the first two months of 2024/25 continues throughout the remainder of the financial year, there would be a 7.61% decrease compared to the outturn tonnage for 2023/24. Decreases against the 2023/24 outturn figures are currently predicted for all the boroughs (Hammersmith & Fulham – 7.58%, Kensington and Chelsea – 6.75%, Lambeth – 10.14% and Wandsworth – 5.46%) although it should be noted that this forecast is based on only two month's data for 2024/25. Tonnages at the Household Waste and Recycling Centre (“HWRC”) are currently predicted to be 7.86% lower than last year.

## **WASTE COMPOSITION 4-YEAR SUMMARY REPORT**

24. Waste composition surveys have been carried out in 2014, 2018, 2020, 2021, 2022 and 2023. In December 2023, the Authority commissioned a report of the average results from the last 4 surveys covering 2020-2023. The results provide evidence for the key emerging action areas in the draft Joint Municipal Waste Management Strategy. Some of the key headlines are set out below:

### **RESIDUAL WASTE**

- On average WRWA households generate 8.3kg/hh/wk of residual waste compared to the national average of 9.8 kg/hh/wk.
- 35.6% of residual waste is food waste.
- When combined with garden waste, this amounts to 56%, which is potentially divertable from residual waste bins.



- Nearly 15% of residual waste is made up of dry mixed recyclables (DMR) that could be collected in current CC collection services.
- Packaging waste accounts for approx. 18% of residual waste, of which 49% is plastic based.
- Plastic film makes up 6.1% or 0.5kg/hh/wk of residual waste
- 48.6% of all plastics in the residual waste are due to films; 72% of which are packaging waste.
- Deposit Return Scheme (DRS) packaging accounts for just 0.9% of residual waste.

### **DRY MIXED RECYCLING (DMR)**

- On average just under 6.0kg/hh/wk of DMR is generated by WRWA households.
- 22.2% of the collected DMR is deemed to be contamination.
- 30% of the contamination is due to plastic not already captured at the MRF.
- Overall, an estimated 79% of all recyclable DMR is captured by participating households, therefore 21% of DMR is still likely to be placed in residual waste bins.
- An estimated 76% of recyclable paper was correctly captured in the recycling containers available with rates of 83% for card and cardboard, 73% for plastic bottles, 51% for plastic tubs, pots and trays, 86% of recyclable glass and 69% for recyclable metals.
- 68.9% of DMR is related to packaging waste.
- Deposit Return Scheme (DRS) packaging in DMR accounts for 4.5%.

### **CHEMICAL MAKE-UP OF THE RESIDUAL WASTE**

25. Estimates were made of the calorific value (CV) and carbon content of the household residual waste. Additional estimates were made for trade waste using figures from a separate survey. Definitions and details are provided on p37 onwards.

- On average 68% of WRWA household waste and 60% of trade waste is deemed to be biodegradable.
- 32% of the total household CV contribution and 33% of that for trade waste is due to plastics.

- By weight, 22% of household waste and 30% of trade waste is due to materials derived from fossil-based carbon. This will be affected by the introduction of the Emissions Trading Scheme (“ETS”), (see paragraphs 28 to 33).
26. The Authority will need comprehensive and robust data on the carbon content of the residual waste that it is sending to EfW in order to be able to verify any additional charge as a result of the ETS. Currently surveys are undertaken every 15 months. Officers consider it prudent to increase this frequency once the Government’s consultation and data requirements are more clear. It is therefore proposed to increase the sample size and frequency of composition surveys to achieve this assurance.

### **WASTE FROM HOUSEHOLD DATA FOR ENGLAND FOR 2022 AND 2022/23**

27. The Department of Environment, Food and Rural Affairs (DEFRA) has released [waste data](#) for 2022. Key headlines are:
- In 2022, total ‘waste from households’ decreased to 21.5 million tonnes from 2021 when it was 23.1 million tonnes. This is equivalent to 377 kg per person, down from 409 kg per person in 2021, a decrease of 7.9 per cent.
  - The official England ‘waste from households’ recycling rate was 43.4 per cent in 2022, down 0.7 percentage points from 44.1 per cent in 2021.
  - The amount of dry material recycled in 2022 was 5.5 million tonnes, down by 0.4 million tonnes from 2021, a decrease of 7.1 per cent.
  - The tonnage of separately collected food waste sent for recycling was 499,000 tonnes, a decrease of 2.6 per cent from 512,000 tonnes in 2021.
  - ‘Other organic’ waste sent for recycling was 3.3 million tonnes, a decrease of 442,000 tonnes or 12 per cent on 2021.

### **EMISSIONS TRADING SCHEME CONSULTATION**

28. Previous Authority reports and Member Briefings have outlined the potential impact of the proposed Emissions Trading Scheme (“ETS”) for Energy from Waste (“EfW”) treatment of residual waste. This legislation is due to take effect from January 2028 and prior to that, EfW operators will be required to undertake two years of monitoring, verification and reporting.
29. The objective of the ETS is a key policy tool to achieving Net Zero. The intention is to encourage a reduction in the release of fossil carbon emissions and support wider waste policies and decarbonisation. In December 2023, the UK ETS Authority announced that it would shortly release a Technical Consultation to seek views on the

development of the scheme. It is expected that the results of this will determine how the ETS will be implemented.

30. On 23<sup>rd</sup> May 2024, the UK ETS Authority announced that it had published a consultation regarding the expansion of the UK ETS to EfW facilities. The consultation covers proposals relating to:
  - a) Scope and coverage
  - b) Adjusting the UK ETS cap for waste
  - c) Participating in the scheme
  - d) Impacts of the scheme and reducing adverse risks
31. The consultation includes a Call for Evidence on incentivising heat networks through the UK ETS. Responses to the consultation are due by 2<sup>nd</sup> August 2024. Through the Authority's membership of the National Association of Waste Disposal Officers (NAWDO), officers are liaising closely with and able to input into NAWDO's response to the consultation.
32. Separately, the UK ETS Authority has also published a consultation regarding the integration of greenhouse gas removals into the UK ETS. The deadline to submit responses is 15<sup>th</sup> August 2024.
33. A draft response to the consultation, which ends on 2nd August, is attached as Appendix B and is recommended for approval.

### **SIMPLER RECYCLING, DEPOSIT RETURN SCHEME (DRS) AND EXTENDED PRODUCER RESPONSIBILITY (EPR) UPDATES**

34. Following further consultation, the Government published the Environment Act 2021 (Commencement No. 9 and Transitional Provisions) Regulations 2024 on 16<sup>th</sup> May. The Statutory Instrument brings into force provisions relating to Simpler Recycling regarding waste separation and collection from households and business premises.
35. By 31<sup>st</sup> March 2026, waste collection authorities must arrange for the separate collection of glass, metal, plastic, paper and card, food waste and garden waste. However, Councils will be allowed to collect plastic, metal, glass, paper and card in one bin in all circumstances. Similarly, food and garden waste will also be allowed to be co-collected. Additionally, the Government is supporting more frequent and comprehensive bin collections. A minimum backstop means Councils will be expected to collect black bin (residual) waste at least fortnightly, alongside weekly food waste collections.

36. Thirty one (31) waste collection authorities in England are named in the Regulations as having been granted ‘transitional arrangements’ that allow them to delay the implementation of separate food waste collections. The agreed delayed implementation dates range from 1<sup>st</sup> June 2026 (Blackburn and Darwen Council) to 1<sup>st</sup> February 2043 (City of York and North Yorkshire Councils). WRWA’s Constituent Councils are not named as the Councils chose not to take the option of transitional arrangements.
37. The introduction of DRS has been delayed until October 2027, to enable the Government to achieve consistency between the proposed arrangements for the devolved administrations across the UK. EPR is due to commence in October 2025 i.e. 2 years before the implementation of DRS. As a result, the drinks containers intended to be captured by DRS (plastic, aluminium and steel containers (150ml to 3l)) will be excluded from EPR. If a DRS scheme has not been established by then these containers will be subject to EPR until a DRS scheme is in place.

#### **WRWA RESPONSE TO BATTERSEA POWER STATION PLANNING APPLICATION**

38. Officers have been made aware that Battersea Power Station submitted a planning application on 3<sup>rd</sup> May 2024 (Application Nos. 2024/1418 and 2024/1398) for the development of their Phase 3c, located directly south of the Power Station building. Officers have requested the Authority’s Property and Planning consultants, Carter Jonas, to respond on WRWA’s behalf, due to the close proximity to Cringle Dock Waste Transfer Station. The response was submitted by the deadline of 30<sup>th</sup> May 2024.
39. The Authority’s objections were on the grounds of risk of complaints of noise and odour. Battersea Power Station’s advisors requested a meeting to discuss the Authority’s objections and this was held on 26<sup>th</sup> June 2024, with both parties technical consultants in attendance.
40. Following the meeting, with the provision of further information at the meeting and subsequently, Carter Jonas, on advice from Authority officers, notified Wandsworth Council’s Planning Section that the Authority wished to formally withdraw our objections to the Planning Application, the Authority having now received assurances from our technical advisors, WSP, that they are satisfied with the additional information provided by BPS on noise and odour matters.

## **EVENING STANDARD ARTICLE ON WRWA AND CC RECYCLING PERFORMANCE**

41. An article entitled “London’s dirty secret: Why the capital is the worst place in the country at recycling” was published by the Evening Standard on 15th May 2024. Officers were alerted to the article by WRWA’s communications agency, London Communications, which cites London’s low recycling performance and specifically names WRWA and its CCs in particular. Despite the headline, the article goes on to state that WRWA has some of the lowest waste arisings and the least waste disposed of to landfill in the country. It also clarifies that London’s households do not produce the amount of garden waste that is generated outside of London, which makes up a significant proportion of performance towards recycling rates.
42. Officers held a meeting with CC Technical Officers to discuss a response to the article. Consequently, London Communications approached the journalist to invite them to visit Smugglers Way and write a follow-up article that presents the local authority view, that had been lacking in the published article. At the time of writing, there was no further update on the invitation and officers will provide a verbal update at the meeting.

## **SMUGGLERS WAY HWRC USER SATISFACTION SURVEY**

43. A Household Waste and Recycling Centre User Satisfaction Survey commenced on Monday 8<sup>th</sup> July 2024, and will run until 31<sup>st</sup> August 2024, or until 700 responses have been received, whichever is the latest (as in previous years).
44. The Survey has been organised in the same way as the last Satisfaction Survey which was undertaken in January to April 2023. It is an online survey, whereby residents who have visited the Centre will automatically receive an email inviting them to participate, two hours after their booking slot. Residents who book in to use the Centre by telephone, will also be invited to participate by telephone.
45. The questions residents will be asked will be the same as in previous years, to ensure comparisons can be made. Results will be provided to Members at the September 2024 Committee meeting.

## **RECRUITMENT OF EDUCATION TEAM LEADER AND PROJECT COORDINATOR**

46. A recruitment process has been completed for the positions of Education Team Leader and Project Coordinator. Three candidates were shortlisted for interview for the Education Team Leader post and 4 for the Project Coordinator. The internal candidates Debra Trayner and Charlie Bishop came through the process as the strongest and have been appointed. A further strong candidate for the

Project Coordinator post was also appointable and, following consultation with the Management Team, and in view of the current high workload, has now been appointed and joined the Team on 15<sup>th</sup> July 2024.

47. Officers have now commenced the recruitment process for an Education Officer, and, should we find a suitable candidate, it is anticipated they will be in post at the start of the Autumn Term.
48. We will now commence the recruitment process for Charlie's former post of Administrative Assistant and a newly created post of Data Analyst.

### **MEMBERS' VISIT**

49. Members will recall that earlier this year, officers had made arrangements for two visits for Members in early 2024, one to the Smugglers Way MRF and the other to the Belvedere Energy from Waste Facility. For differing reasons neither of these visits were progressed.
50. Following a 14<sup>th</sup> May 2024 presentation by Cory to WRWA officers and Borough Directors on the development of their works on Carbon Capture and Storage progress on the Riverside Energy Park, officers feel that a Member visit to the Belvedere site to view progress on the construction of the Riverside Energy Park and to discuss with Cory the potential impact of the Emissions Trading Scheme and their plans for Carbon Capture will be of interest. If Members would like officers to arrange a visit to the facility in the coming months, officers will make the necessary arrangements with Cory.

### **ADVICE AND SUPPORT CONTRACT RE-PROCUREMENT**

51. A number of contracts for external advice and support expire in 2024, as set out below. Members will be aware that WRWA's small client team is managing a significant workload including the Joint Municipal Waste Management Strategy, the Procurement Strategy (OBC) and business cases for Cringle Dock and Feathers Wharf.
52. In view of the need for continuity of specialist advisory support to these projects and the time and resource needed by officers to reprocure these services, officers have sought legal advice on the Authority's position with regard to contract extensions. The contracts affected are set out in Table 1 below.

Table 1

Contract	Supplier	Expiry	Average cost/yr <u>OR</u> fixed price	Recommendation
Public Law advice	Browne Jacobson	Dec 2024	£10,000.00	<b>Extend for 1 year to 31<sup>st</sup> Dec 2025 and review. A further 1-year extension to Dec 2026 is allowed for in the contract.</b>
Property and Planning advice	Carter Jonas	N/A	£35,000.00	<b>Extend to 31<sup>st</sup> Dec 2025 and review.</b>
Technical support and advice on Procurement OBC and Strategy	WSP	Dec 2024	£83,277.50 (fixed price)	<b>Modify to include 'additional services' and extend to 31<sup>st</sup> Dec 2025</b>
Technical advice on developing infrastructure	WSP	Dec 2024	£392,585.00 (fixed price)	<b>Modify to include 'additional services' and extend to Dec. 2025</b>
IT support	Choice Computing	Mar 2025	£16,000.00	<b>Extend to 31<sup>st</sup> March 2026</b>

53. Officers have sought legal advice from the Authority's public law advisors, Browne Jacobson and subsequently recommended that the scope and timeframe of the contracts be extended by one year and each one reviewed again in 2025. This action was approved under Standing Order 106.

### **GOVERNMENT FINANCIAL SUPPORT FOR FOOD WASTE TREATMENT**

54. At the February 2024 Authority meeting it was agreed that the Authority should write to the Government highlighting that provision needed to be made for the capital costs incurred by waste disposal authorities when complying with the new legal requirement for the collection of food waste for example for waste bulking and transfer infrastructure. A letter was sent to the Department of Environment Food and Rural Affairs ("DEFRA") on 27<sup>th</sup> February 2024, attached at Appendix C. No response was received and no update on the issue of waste disposal authority costs has been published. Consequently, the Interim General Manager wrote again to DEFRA on 13<sup>th</sup> June 2024 (Appendix D) and received a response on 8<sup>th</sup> July 2024 (Appendix E).

### **ABANDONED VEHICLE AGREEMENT**

55. The Authority entered into an agreement with the CCs in 2018 regarding the disposal of Abandoned Vehicles. This agreement expires on 31<sup>st</sup> March 2025 unless extended by agreement. It is proposed to commence discussion to review the future arrangements to meet that deadline. A report will be scheduled for the January/February 2025 Authority Meeting.

### **REVISION OF AUTHORITY CODES**

56. Unless required sooner, due to changes in legislation or other circumstances, the Authority's staff codes and procedures are reviewed on a quinquennial basis to ensure that:

- all references are up to date;
- they are in line with all current laws; and
- they match the prevailing staff structure.

57. The Authority Codes and Policies are next due for review at the end of 2024 and will be presented to the January/February 2025 Committee Meeting for approval.

58. Due to legislative changes which came into force on 6<sup>th</sup> April 2024, it has proved necessary to amend a number of these Codes in the interim to bring up to date. The Codes/Policies affected are the Maternity, Paternity, Adoption and Shared Parental Leave and Pay and Parental Bereavement guidance, the Flexible and New Ways of Working Policy and we have introduced Carer's Leave to our Other Types of Leave guidance. These have been updated to reflect the required changes and the new codes have been distributed to members of staff.

### **CONSTITUENT COUNCIL NEW RECYCLING INITIATIVES**

59. At the meeting of the Authority on 22<sup>nd</sup> September 2010 (Paper No. WRWA 669A) Members instructed the Clerk to write to each of the constituent councils to inform them that, in future, should they wish to make arrangements themselves to recycle any significant tonnage of waste then, in accordance with Section 48 of the Environment Protection Act 1990, they must, as soon as reasonably practicable, notify the Authority in writing. The Authority will then approve or object to any such proposal at its next available meeting. The Clerk wrote to the constituent councils, as instructed, on 27<sup>th</sup> October 2010.

60. Since the last Authority meeting, CC's have advised Authority officers informally that they intend to expand their food waste trials to full boroughwide services in line with Simpler Recycling.



**ITEMS COSTING BETWEEN £5,000 AND £30,000**

61. The reportable items of expenditure authorised by officers under delegated powers within the band range of £5,000 to £30,000 since the last Authority meeting.

Shakespeare Martineau	Legal Advice - WMSA	£18,207.00
Carter Jonas	Cringle Project	£14,265.00
Proactis Tenders Limited	Tendering Platform – Annual Charge	£5,565.00
Bevan Brittan	WMSA & Procurement Strategy	£10,117.00
Bevan Brittan	Commercial Legal	£20,880.70
KPMG	External Audit Services - 2023/24	£27,683.00
Deloitte	External Audit Services - 2022/23	£12,058.00
Browne Jacobson	Cringle Dock project	£6,484.90
Corporation of London	Hazardous Waste Collection Service Provision	£6,494.75
Intelisos	Consultancy Advice on JMWMS	£6,600.00

**COMMENTS OF THE TREASURER**

62. The financial impact of the Emissions Trading Scheme will require further consideration but any cost passed through under the contractual terms by Cory will need to be funded eventually by the constituent boroughs under the levy arrangements.

63. All other proposals outlined here will be met from within existing approved budgets during the year and any future impact will be included when setting the budget in February 2025.

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R ESPINOSA  
INTERIM GENERAL MANAGER

Western Riverside Administration Office  
Smugglers Way  
Wandsworth  
SW18 1JS

15<sup>th</sup> July 2024

After **2** months of 2024/2025**General Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025				
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent		
HF	55,590	55,435	52,852	51,793	8,684	45,461	-	6,332	-12.23%	52,257	-	6,796	-13.01%
KC	46,755	53,842	55,272	54,370	9,232	51,127	-	3,244	-5.97%	55,509	-	4,382	-7.89%
LA	88,694	87,517	87,083	87,112	14,860	81,345	-	5,767	-6.62%	85,540	-	4,195	-4.90%
WA	80,509	78,795	75,004	75,669	13,371	71,297	-	4,372	-5.78%	73,872	-	2,575	-3.49%
WRWA	9,504	7,939	6,958	7,444	1,505	7,001	-	443	-5.96%	6,935	-	66	0.95%
<b>Total</b>	<b>281,052</b>	<b>283,526</b>	<b>277,170</b>	<b>276,389</b>	<b>47,652</b>	<b>256,230</b>	<b>-</b>	<b>20,159</b>	<b>-7.29%</b>	<b>274,113</b>	<b>-</b>	<b>17,883</b>	<b>-6.52%</b>
<b>Change</b>		2,475	-	6,357	-	781	-	228,737	-	20,159			
<b>Percentage Change</b>		0.88%	-2.24%	-0.28%	-82.76%	-7.29%							

**Co-Mingled Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025				
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent		
HF	12,573	12,030	11,149	11,959	2,184	13,301	-	1,342	11.23%	10,984	-	2,317	21.09%
KC	12,528	14,076	13,962	13,611	2,262	12,460	-	1,151	-8.46%	13,959	-	1,499	-10.74%
LA	22,317	20,728	17,223	16,527	2,395	11,678	-	4,848	-29.34%	17,100	-	5,422	-31.71%
WA	23,577	21,842	19,343	19,667	3,305	19,605	-	63	-0.32%	19,080	-	525	2.75%
WRWA	373	407	344	283	40	196	-	87	-30.76%	332	-	136	-40.94%
<b>Total</b>	<b>71,368</b>	<b>69,082</b>	<b>62,022</b>	<b>62,047</b>	<b>10,186</b>	<b>57,240</b>	<b>-</b>	<b>4,807</b>	<b>-7.75%</b>	<b>61,455</b>	<b>-</b>	<b>4,215</b>	<b>-6.86%</b>
<b>Change</b>		2,286	-	7,061	-	26	-	4,807					
<b>Percentage Change</b>		-3.20%	-10.22%	0.04%									

**Co-Mingled Contamination (Percentage)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Change in Percentage
							Point
HF	13.93%	16.93%	16.88%	16.93%	17.26%	17.26%	0.33%
KC	11.03%	11.48%	12.29%	10.75%	9.54%	9.54%	-1.21%
LA	14.49%	16.59%	15.23%	14.23%	13.01%	13.01%	-1.22%
WA	13.49%	14.12%	12.67%	13.52%	12.55%	12.55%	-0.98%
WRWA	13.90%	14.84%	14.09%	13.82%	13.05%	13.05%	-0.77%

**Co-Mingled Contamination (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2017/2018		2024/2025		Budget	
							Change Tonnes	Change Percent	Budget Percentage	Budget Tonnes	Change Tonnes	Change Percent		
HF	1,752	2,036	1,881	2,025	377	2,296	-	271	13.38%	16.7%	1,833	-	463	25.26%
KC	1,382	1,616	1,716	1,463	216	1,188	-	275	-18.78%	12.5%	1,748	-	560	-32.01%
LA	3,233	3,439	2,623	2,351	312	1,519	-	832	-35.41%	15.6%	2,666	-	1,147	-43.03%
WA	3,181	3,084	2,450	2,660	415	2,460	-	200	-7.52%	13.4%	2,554	-	94	-3.69%
WRWA	52	60	48	39	5	26	-	14	-34.60%	14.5%	48	-	22	-46.69%
<b>Total</b>	<b>9,600</b>	<b>10,235</b>	<b>8,720</b>	<b>8,538</b>	<b>1,324</b>	<b>7,489</b>	<b>-</b>	<b>1,050</b>	<b>-12.30%</b>	<b>14.4%</b>	<b>8,849</b>	<b>-</b>	<b>1,360</b>	<b>-15.37%</b>
<b>Change</b>		635	-	1,516	-	181	-	1,050						
<b>Percentage Change</b>		6.62%	-14.81%	-2.08%										

**Green Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025				
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent		
HF	98	78	98	74	-	65	-	9	-11.84%	154	-	89	-57.76%
KC	495	514	469	486	69	450	-	36	-7.45%	459	-	9	-2.07%
LA	608	574	853	805	115	621	-	184	-22.90%	949	-	328	-34.61%
WA	365	325	287	301	8	83	-	218	-72.54%	243	-	160	-66.00%
WRWA	3,099	2,647	2,058	2,355	606	2,057	-	298	-12.67%	2,012	-	45	2.22%
<b>Total</b>	<b>4,665</b>	<b>4,139</b>	<b>3,764</b>	<b>4,020</b>	<b>798</b>	<b>3,274</b>	<b>-</b>	<b>746</b>	<b>-18.55%</b>	<b>3,817</b>	<b>-</b>	<b>543</b>	<b>-14.22%</b>
<b>Change</b>		527	-	374	-	256	-	746					
<b>Percentage Change</b>		-11.29%	-9.04%	6.79%									

**Clinical Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	16	14	12	10	2	12	2	15.33%	11	1	9.46%
KC	1	1	1	2	0	1	1	-30.85%	1	0	23.08%
LA	4	6	6	5	1	6	1	10.60%	6	0	-1.93%
WA	65	75	73	74	-	-	74	-100.00%	73	73	-100.00%
WRWA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
<b>Total</b>	<b>87</b>	<b>96</b>	<b>92</b>	<b>91</b>	<b>3</b>	<b>19</b>	<b>72</b>	<b>-79.01%</b>	<b>91</b>	<b>72</b>	<b>-78.95%</b>
<b>Change</b>		9	4	0		72					
<b>Percentage Change</b>		10.48%	-4.40%	-0.46%		-79.01%					

**Detritus Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	463	434	469	513	90	606	94	18.25%	440	166	37.77%
KC	806	707	666	641	70	398	243	-37.94%	669	271	-40.55%
LA	542	562	458	522	68	445	77	-14.74%	471	26	-5.50%
WA	2,861	2,613	2,481	2,456	271	1,769	686	-27.95%	2,577	808	-31.34%
WRWA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
<b>Total</b>	<b>4,672</b>	<b>4,316</b>	<b>4,074</b>	<b>4,131</b>	<b>499</b>	<b>3,218</b>	<b>913</b>	<b>-22.10%</b>	<b>4,157</b>	<b>939</b>	<b>-22.58%</b>
<b>Change</b>		356	243	58		913					
<b>Percentage Change</b>		-7.61%	-5.62%	1.41%		-22.10%					

**Battery Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	0	0	1	0	0	0	0	154.83%	1	1	-54.13%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	32	26	22	27	7	41	13	49.21%	28	13	46.01%
<b>Total</b>	<b>32</b>	<b>26</b>	<b>23</b>	<b>28</b>	<b>7</b>	<b>41</b>	<b>14</b>	<b>49.90%</b>	<b>29</b>	<b>12</b>	<b>42.56%</b>
<b>Change</b>		6	4	5		14					
<b>Percentage Change</b>		-17.56%	-13.52%	20.44%		49.90%					

**Electrical Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	10	13	10	14	1	5	8	-61.04%	9	4	-40.96%
KC	32	15	8	2	1	8	5	248.42%	7	1	7.51%
LA	106	70	91	71	48	268	197	277.64%	52	216	414.90%
WA	4	1	1	1	-	-	1	-100.00%	1	1	-100.00%
WRWA	792	673	575	564	108	588	24	4.32%	563	25	4.51%
<b>Total</b>	<b>944</b>	<b>772</b>	<b>686</b>	<b>651</b>	<b>158</b>	<b>869</b>	<b>218</b>	<b>33.39%</b>	<b>632</b>	<b>237</b>	<b>37.50%</b>
<b>Change</b>		172	86	34		218					
<b>Percentage Change</b>		-18.25%	-11.19%	-4.99%		33.39%					

**Fridge Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	81	88	78	78	15	82	4	4.86%	75	7	8.97%
KC	39	45	42	33	6	38	5	13.67%	39	1	-2.42%
LA	172	151	132	92	17	99	7	7.90%	104	5	-4.71%
WA	75	59	71	89	18	118	28	31.70%	60	58	96.23%
WRWA	74	56	51	46	11	46	0	0.08%	51	5	-9.61%
<b>Total</b>	<b>440</b>	<b>400</b>	<b>375</b>	<b>339</b>	<b>66</b>	<b>383</b>	<b>44</b>	<b>12.99%</b>	<b>329</b>	<b>54</b>	<b>16.33%</b>
<b>Change</b>		40	25	37		44					
<b>Percentage Change</b>		-9.19%	-6.13%	-9.76%		12.99%					

**Gas Bottle Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	1	1	1	2	0	1	1	-70.49%	1	0	-44.52%
KC	1	2	5	5	0	3	2	-37.53%	5	2	-33.78%
LA	1	2	2	1	0	1	0	-5.46%	2	1	-55.56%
WA	1	1	0	1	0	17	16	1668.03%	-	17	0.00%
WRWA	16	24	27	17	0	15	2	-11.72%	30	15	-49.98%
<b>Total</b>	<b>20</b>	<b>30</b>	<b>36</b>	<b>26</b>	<b>1</b>	<b>37</b>	<b>11</b>	<b>42.10%</b>	<b>38</b>	<b>1</b>	<b>-2.40%</b>
<b>Change</b>		10	6	10		11					
<b>Percentage Change</b>		48.08%	20.17%	-27.60%		42.10%					

**Carpet Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	365	281	-	-	-	-	-	0.00%	-	-	0.00%
Total	365	281	-	-	-	-	-	0.00%	-	-	0.00%
Change	-	84	-	281	-	-	-	-	-	-	0.00%
Percentage Change		-23.01%	-100.00%								

**Inert Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	2	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	5	5	55	20	167	112	205.91%	-	167	0.00%
WA	4	-	-	1	1	1	0	88.16%	-	1	0.00%
WRWA	1,891	1,508	1,068	992	254	1,027	34	3.48%	995	32	3.20%
Total	1,897	1,513	1,073	1,048	274	1,195	147	14.07%	995	200	20.09%
Change	-	384	-	439	-	26	-	147	-	-	-
Percentage Change		-20.25%	-29.05%	-2.41%		14.07%					

**Oil/Paint/Rigid Plastics Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	0	0	23	22	43	20	85.29%	-	43	0.00%
KC	0	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	6	27	29	6	25	4	-12.40%	192	167	-86.91%
WA	-	-	-	0	0	0	0	88.16%	-	0	0.00%
WRWA	16	39	151	213	49	239	26	12.23%	410	171	-41.62%
Total	16	45	179	265	77	307	42	15.92%	602	295	-48.96%
Change	-	28	134	86	-	42	-	-	-	-	-
Percentage Change		171.38%	301.08%	48.30%		15.92%					

**Paper/Cardboard Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	-	-	-	1	-	1	0	-11.84%	-	1	0.00%
LA	423	323	239	220	16	80	139	-63.40%	264	184	-69.55%
WA	2	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	1,171	1,023	876	910	160	845	65	-7.13%	847	2	-0.28%
Total	1,595	1,346	1,115	1,130	175	926	204	-18.08%	1,111	185	-16.67%
Change	-	249	-	231	15	-	204	-	-	-	-
Percentage Change		-15.61%	-17.15%	1.32%		-18.08%					

**Scrap Metal Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	10	16	21	36	4	36	0	0.92%	19	17	89.73%
KC	-	4	0	3	-	3	0	-11.84%	-	3	0.00%
LA	62	61	62	57	2	8	48	-85.49%	51	43	-83.89%
WA	7	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	699	684	589	638	127	655	17	2.69%	549	106	19.25%
Total	779	764	672	733	134	702	31	-4.27%	619	83	13.35%
Change	-	15	-	92	61	-	31	-	-	-	-
Percentage Change		-1.86%	-12.09%	9.11%		-4.27%					

**Textile Waste Delivered (Tonnes)**

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025		
							Change Tonnes	Change Percent	Budget Tonnes	Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	287	260	250	251	48	252	1	0.54%	243	9	3.71%
Total	287	260	250	251	48	252	1	0.54%	243	9	3.71%
Change	-	27	-	11	1	1	-	-	-	-	-
Percentage Change		-9.31%	-4.13%	0.40%		0.54%					

## Appendix A

### Tyre Waste Delivered (Tonnes)

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025 Budget Tonnes	Budget	
							Change Tonnes	Change Percent		Change Tonnes	Change Percent
HF	0	2	0	0	-	-	0	-100.00%	-	-	0.00%
KC	0	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	5	7	7	1	0	1	0	-36.01%	5	4	-85.15%
WA	1	1	1	4	0	6	3	76.84%	1	5	547.23%
WRWA	-	12	11	7	-	6	1	-11.84%	11	5	-44.70%
<b>Total</b>	7	22	20	12	0	13	1	11.37%	17	4	-21.78%
<b>Change</b>		15	2	8		1					
<b>Percentage Change</b>		206.94%	-9.86%	-40.06%		11.37%					

### Wood Waste Delivered (Tonnes)

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025 Budget Tonnes	Budget	
							Change Tonnes	Change Percent		Change Tonnes	Change Percent
HF	-	-	-	-	-	-	-	0.00%	-	-	0.00%
KC	-	-	-	-	-	-	-	0.00%	-	-	0.00%
LA	-	58	259	327	73	353	26	7.99%	246	246	-100.00%
WA	-	-	-	-	-	-	-	0.00%	-	-	0.00%
WRWA	3,808	3,298	3,025	3,065	543	2,523	542	-17.69%	2,999	476	-15.88%
<b>Total</b>	3,808	3,356	3,284	3,392	616	2,876	516	-15.22%	3,245	369	-11.37%
<b>Change</b>		452	72	108		516					
<b>Percentage Change</b>		-11.88%	-2.15%	3.29%		-15.22%					

### Total Waste Delivered (Tonnes)

	2020/2021	2021/2022	2022/2023	2023/2024	TO DATE 2024/2025	FORECAST 2024/2025	Annual		2024/2025 Budget Tonnes	Budget	
							Change Tonnes	Change Percent		Change Tonnes	Change Percent
HF	68,843	68,112	64,691	64,501	11,003	59,612	4,889	-7.58%	63,951	4,339	-6.79%
KC	60,660	69,206	70,426	69,155	11,640	64,488	4,667	-6.75%	70,648	6,160	-8.72%
LA	112,934	110,069	106,448	105,822	17,621	95,097	10,725	-10.14%	104,982	9,885	-9.42%
WA	107,470	103,711	97,262	98,262	16,975	92,896	5,366	-5.46%	95,907	3,011	-3.14%
WRWA	22,129	18,877	16,005	16,812	3,457	15,491	1,322	-7.86%	16,005	514	-3.21%
<b>Total</b>	372,036	369,975	354,833	354,552	60,695	327,583	26,970	-7.61%	351,493	23,910	-6.80%
<b>Change</b>		2,061	15,142	281		26,970					
<b>Percentage Change</b>		-0.55%	-4.09%	-0.08%		-7.61%					

## Consultation on UK Emissions Trading Scheme Scope Expansion: Waste

### Why we are consulting

The UK ETS Authority is seeking input on proposals for expanding the UK ETS to the waste sector.

We have previously announced our intention to expand the scope of the UK ETS to waste incineration facilities. This consultation seeks views on our proposals to inform implementation details. In particular, it proposes options and/or seeks views on:

- The scope of the scheme, including which activities are covered, thresholds for inclusion and exemptions,
- Participating in the scheme, including requirements for operators, monitoring, reporting and verification, and guidance,
- Impacts of the scheme and risks, including diversion of waste to landfill and waste export, decarbonisation pathways for customers, cost pass through to customers and equality considerations,
- How to adjust the UK ETS cap for waste, and
- How the UK ETS could potentially incentivise investment in heat networks.

**Consultation dates: 23 May 2024 to 2<sup>nd</sup> August 2024**

Trevor Pugh

[trevor@wrwa.gov.uk](mailto:trevor@wrwa.gov.uk)

Joint Waste Disposal Authority

Western Riverside Waste authority.

### Questions:

1. Do you agree that our proposals should apply to facilities that conduct the following activities: incineration and combustion of waste, and other energy recovery from waste (including the production of fuels)?

(Y/N) Please give further details to support your answer.

Y

In principle yes, these activities are significant carbon emitters and the proposals could potentially support the waste treatment hierarchy. However, we have strong concerns that the proposals will lead to significant costs being placed on local authorities who are unable to sufficiently influence the necessary changes to minimise fossil carbon emissions for example product design and levels of consumption. If EPR costs are passed back to manufacturers it will help but only for the element of residual waste that is within the scope of EPR.

2. Are there any technologies which we have not referenced in this section, and which would not be covered by the activities we have set out, which you think should be covered by our proposals?

(Y/N) Please give further details to support your answer.

N

Not at present but needs to be kept under review

3. Do you agree that facilities that produce monomers and polymers from waste that can be used as raw materials (non-mechanical or 'chemical' recycling) for materials to remain in the circular economy should not be included in the scope of our proposals?

N

Not at present but needs to be kept under review

4. If yes, how should we treat facilities that produce both fuels and polymers and monomers to be used as raw materials?

(Y/N) Please give further details to support your answer.

5. Do you have any concerns with our position not to use the 20MW thermal input threshold for inclusion in the UK ETS?

(Y/N) Please give further details to support your answer.

Y

Small scale plants are generally managing specialist waste (clinical/hazardous) and are already significantly more expensive than municipal facilities. It is unlikely that they are able to take steps to decarbonise their waste inputs and as such should be exempt as they are primarily waste disposal facilities provided to protect public health.

6. Should an alternative threshold for inclusion in the UK ETS be explored (e.g. waste throughput capacities) or will HSE and USE status eligibility sufficiently protect smaller facilities? Please give further details to support your answer.

Small scale plants are generally managing specialist waste (clinical/hazardous) and are already significantly more expensive than municipal facilities. It is unlikely that they are able to take steps to decarbonise their waste inputs and as such should be exempt as they are primarily waste disposal facilities provided to protect public health.

7. Do you agree that the proposed thresholds for HSE and USE status are suitable for waste incineration facilities?

(Y/N) Please give further details to support your answer.

Small scale plants are generally managing specialist waste (clinical/hazardous) and are already significantly more expensive than municipal facilities. It is unlikely that they are able to take steps to decarbonise their waste inputs and as such should be exempt as they are primarily waste disposal facilities provided to protect public health.

8. Do you agree that it is unlikely that smaller facilities will be developed to gain eligibility for HSE or USE status?

(Y/N) Please give further details to support your answer.

Y

Because of current efficiency considerations.

9. If you disagree with the proposed thresholds for HSE and USE status, what alternatives would be suitable?

Small scale plants are generally managing specialist waste (clinical/hazardous) and are already significantly more expensive than municipal facilities. It is unlikely that they are able to take steps to decarbonise their waste inputs and as such should be exempt as they are primarily waste disposal facilities provided to protect public health.



10. Do you agree with our position to include the incineration of hazardous and clinical waste in the UK ETS?

(Y/N) Please give further details to support your answer and set out any concerns that you may have.

N

As above should be excluded for public health and viability reasons. Landfill is not an alternative.

Some wastes have to be incinerated by law and these should be exempt for example furniture containing POPs.

11. What decarbonisation options will be available to hazardous and clinical waste incinerators and in what timescale (e.g. immediately or long-term)?

The principal decarbonisation option is the design the products ie lies with the producers.

12. Would the emissions monitoring methods outlined in the 'Monitoring and reporting' section be available to non-specialist incinerators also be available to hazardous and clinical waste incinerators of the same size?

(Y/N) Please give further details to support your answer.

Y

13. If hazardous or clinical waste incineration was ever to be exempted from the UK ETS, is there a risk of other waste types being mislabelled as either to avoid the UK ETS?

(Y/N) Please give further details to support your answer.

N

Low risk level

14. Do you agree that HSE emission targets will incentivise clinical waste incinerators to decarbonise?

(Y/N) Please give further details to support your answer.

N

Primary responsibility to decarbonise should be with the producers of the materials with fossil content not the operators or customers.

15. Do you agree that the customers of clinical waste incinerators will be able to take action to reduce the fossil content in the waste they generate and achieve their waste reduction targets?

(Y/N) Please give further details to support your answer.

N

Primary responsibility to decarbonise should be with the producers of the materials with fossil content.

16. Do you agree that the proposed approach, of adding allowances equivalent to emissions in scope per emissions trajectories aligned to the CBDP, is the appropriate approach to adjusting the cap, to ensure the emissions reductions required to deliver climate targets?

(Y/N). Please explain your reasoning, including by proposing an alternative approach if appropriate.

N

Proposed approach aligns with Net Zero ambition however waste reform policies and carbon capture technology will not have sufficient impact on the timescale proposed.

17. Do you agree with the proposed approach to adjusting the cap to account for the inclusion in the scheme of emissions from the waste incineration sector?

(Y/N). Please explain your reasoning, with reference to any alternative approaches or sources of evidence, such as on the impact of policies on the fossil proportion of emissions.

N

Must ensure that fossil abatement assumed in adjustment of the cap is being delivered by the relevant policy measures as anticipated otherwise effect would be punitive.

18. What would you expect to be the impact of the proposed approach to cap adjustment on participants in the sector and/or the wider UK ETS market? Please explain your reasoning.

Increase the cost of residual waste disposal for local authorities without them having the levers and tools to offset this through decarbonising the waste stream. It is also particularly challenging for local authorities to budget for the requirements of a volatile emissions allowance market.

19. Do you agree that it is practicable for existing regulatory requirements under the scheme, such as the compliance cycle, permit requirements, monitoring plan requirements and penalties, to apply to the waste sector?

(Y/N) Please give further details to support your answer.

20. Do you agree that an MRV-only period is the best way to meet the objectives of a phasing period for this sector?

(Y/N). Please give further details to support your answer.

Y

21. How will operators and customers use any data from the MRV-only period?

Depends on the cost distribution. Customers may want to use MRV to inform budget planning and cost mitigation strategies. Public Sector customers should not be required to pay for allowances through cost pass through. Trading scheme should remain a (private sector) market instrument.

22. For customers and operators, will knowing expected costs earlier than full implementation provide an early incentive to reduce your exposure to the carbon price?

(Y/N). Please give further details to support your answer.

Y

Extent depending on how costs are calculated and distributed. Public Sector customers should not be required to pay for allowances through cost pass through. Trading scheme should remain a (private sector) market instrument. Local authorities do not have sufficient influence on the carbon content of the waste they have to manage to offset the cost of allowances.

23. If the MRV period is mandatory (Option 1): Do you agree that waste incineration facilities should be subject to the same MRV requirements for 2026-28 that they will be subject to from 2028 onwards (e.g. report emissions for all combustion units onsite)?

Y

However, concern that some local authorities may be subject to contractual QCiL claims for these additional costs.

24. If the MRV period is mandatory (Option 1): Do you have any concerns with the requirement for all waste incineration facilities to meet MRV requirements, before applying for HSE/USE status?

Y

Practicality of technologies required being applied in timescale and risk of associated pass-through costs for local authorities.

25. If the MRV period is voluntary (Option 2): How likely do you think it is that operators would monitor their fossil emissions?

It is uncertain that the majority will because of cost and the results may not be sufficiently accurate for modelling or be comparable.

26. If the MRV period is voluntary (Option 2): How likely do you think it is that operators would:  
a) share their emissions with customers so they are better informed about potential future costs, and

Operators may not be fully open about sharing this information if voluntary. For example, they may be in negotiation with customers about changes to contracts re passing on cost where this information has a bearing and also, they may not yet be satisfied that their monitoring is reliable and would meet the standards required after full implementation.

b) share their emissions with the UK ETS Authority to inform cap decisions and evidence HSE or USE status eligibility?

Operators may do this but comments at Q25 apply.

27. Do you have any other comments on the MRV-only transitional period, and either of the options identified?

Would prefer a mandatory MRV period involving all in scope facilities in order to generate the widest data capture possible to properly inform how we best calculate fossil content going forward per customer in order to configure and implement mitigation / decarbonisation strategies.

28. Do you agree that a tiered approach should be taken to monitoring and reporting requirements under the UK ETS?

(Y/N). Please give further details to support your answer.

Y

Tiered approach seems proportionate to allow for the size of the operation and the emissions. However, approach needs to allow for the differentiation of fossil carbon content of different customer feedstocks so that any cost pass-through can be based fairly.

29. Do you think that Option 1 would be suitable for waste incineration facilities?

(Y/N). Please give further details to support your answer.

Y

Higher tier operators should have less uncertainty in their monitoring methods.

30. Do you agree with our estimations in Figure 4 on how the available emissions monitoring methods for the sector could correlate with the uncertainty ranges for each tier in Option 1?

(Y/N). Please give further details to support your answer.

Y

However, concern that feedstock sampling not assessed as suitable. Feedstock sampling is important for customers to ensure fair cost pass-through for example where mixed inputs to EfW with different fossil carbon contents. However, Public Sector customers should not be required to pay for allowances through cost pass through. Trading scheme should remain a (private sector) market instrument.

31. Do you think that Option 2 would be suitable for waste incineration facilities? (Y/N). Please give further details to support your answer.

Y

Follows same principles as option 1.

32. What approach (e.g. national, regional or installation specific) should be taken to the development of default calculation factors for smaller installations? Please give further details to support your answer.

Installation specific as feedstocks will vary. Need for consistency and accurate and up to date composition data.

33. On which aspects of the policy should we produce guidance, either for operators, their customers, or both? Please explain your reasoning.

Customers would like guidance on cost pass-through and interaction with other waste policies eg pEPR and decarbonisation opportunities.

34. How should we seek to test any guidance either for operators, their customers, or both? Please explain your reasoning.

Through representative bodies eg NAWDO, CIWM, LARAC, ADEPT, LGA, ESA.

35. To what timescale should guidance on different aspects of the policy, and for different audiences, be produced? Please explain your reasoning.

Guidance needed asap before MRV- only period to inform service and budget planning.

36. Do you expect waste incineration gate fees to become more expensive than landfill or export as a result of UK ETS expansion? Is this expectation the same for all material types and regions? Please provide evidence to support your answer.

Y

To reflect capital and revenue costs of MRV, allowances and carbon capture, transfer and storage. Costs will vary with material types.

37. If waste incineration gate fees were to become relatively more expensive, with consideration of non-price factors when taking waste disposal and management decisions, how significant is the risk that waste is, in practice, diverted back down the hierarchy to landfill or export?

Significant for land fill due to local factors eg outlet accessibility, existing contracts. However compliant export should be an acceptable alternative to land fill in some circumstances.

38. Considering possible benefits and challenges that could arise, do you think that further UK ETS expansion to landfill should be explored as a mechanism to protect against the diversion of waste from waste incineration to landfill?

(Y/N) Please give further details to support your answer.

N

Would enable alignment with EfW ETS but significant practical barriers and other regulatory and financial approaches should be used.

39. Do you think alternative options to manage the landfill risk should be explored? If so, please give further details on which options and why.

Y

And it may require more than one approach.

40. Do you think that either of the approaches outlined above to address landfill risk would give rise to unintended consequences?

(Y/N) Please give further details to support your answer.

Y

Could be locations where there are no viable alternatives to land fill.

41. What would be the most effective approach to mitigate the risk of waste being diverted from waste incineration to RDF/SRF export? Please give details to support your answer.

42. Do you think that limiting the number of RDF/SRF export permits/licenses issued would be an effective mechanism to reduce the risk of waste diversion from waste incineration to export abroad?

(Y/N) Please give further details to support your answer.

43. Do you think that a permitting/licensing charge on RDF/SRF exports would be an effective mechanism to reduce the risk of waste diversion from waste incineration to export abroad?

(Y/N) Please give further details to support your answer.

44. Would a fixed or variable charge be most effective at managing this risk? Please give further details to support your answer.

45. If we were to proceed with the development of a variable charge rate:

a) Would it be sufficient for the charge rate to reflect the UK ETS carbon price?

b) Will consideration need to be given in the charge rate calculation to the carbon price (if any) in the destination country to which RDF/SRF exports are bound?

c) How frequently will variable charge rates need to be updated?

46. Do you think that alternative options to manage the RDF/SRF export risk should be explored?

(Y/N) If so, please give further details on which options and why.

47. Do you think that any option to address RDF/SRF export mitigation risk could give rise to unintended consequences?

(Y/N) Please give further details to support your answer.

48. Do you agree with the decarbonisation pathways for waste incineration facilities detailed above?

(Y/N) Please give further details to support your answer, including information on the ability of local authorities and/or waste incineration operators to undertake the decarbonisation

pathways detailed. Please also provide any information on additional decarbonisation activities or pathways that are available to local authorities and/or waste incineration operators.

N

As stated above local authorities are not well placed to significantly de-carbonise the waste streams that they are responsible for managing. Where they can have a marginal impact, they are currently not resourced sufficiently to optimise all of the decarbonisation pathways available to them. Behaviour change strategies are expensive and need to be continual. Reducing the contamination of recycling collections for example requires targeting of individual households and that can best be done by personal engagement. In addition to providing financial support for the collection of additional recyclable materials, local authorities also need financial support for the necessary consequential changes to waste treatment infrastructure. Examples are the provision of waste bulking and transfer infrastructure for food waste that is required to meet Simpler Recycling waste collection requirements and changes to Materials Recovery Facilities for example to extract soft plastics. These capital investments are currently not financially supported.

49. Do you have any evidence on the costs, savings and potential profits that could be generated from decarbonisation technologies such as CCS and heat networks?

(Y/N) If yes, please provide further details. We would particularly welcome evidence for the whole contractual period and/or lifetime of the facility.

N

We are only able to make rough calculations with assumptions of fossil carbon content in our residual waste stream and allowance prices. The volatility of prices makes even these calculations unreliable.

50. Please provide any comments on cost savings from decarbonisation technologies such as CCS and heat networks and whether these will be passed back to customers, including local authorities.

Any cost savings will be discounted by the cost of CCS and MRV installation and operation and it is expected that there will be a net cost that is passed back to customers.

51. Do you agree there is a need for guidance on decarbonisation for local authorities and waste incineration operators?

(Y/N) Please give further details to support your answer, including any information on the type, form and content of guidance needed.

Y

It will be important to ensure that operators and local authorities do whatever is reasonable and practical to reduce EfW carbon emissions and guidance will help to provide consistency of approach. Guidance on what local authorities can expect in terms of information provision and sharing from their contractors would be useful. It is important that there is a clear and level playing field coming from contractor to their local authority clients and that this is in a format that can be easily understood.

52. Beyond the mechanisms listed above, are there any other mechanism(s) you would recommend to support local authorities to decarbonise?

(Y/N) Please give further details to support your answer, including any information on the type of support mechanism(s) recommended and details on the type of materials that may fall outside the scope of the proposed support mechanisms detailed above.

Y

Products using materials in scope of ETS should have a cost placed upon them to cover the cost of disposing of such products at the end of their life. This is in line with the polluter pays principle and enables consumers to make informed choices.

53. Do you think that sampling (e.g. MRF requirements) would be an effective approach for supporting accurate cost pass through from EfW operators to customers?

(Y/N) Please give further details to support your answer.

Y

Robust composition analysis of individual local authority and other feedstocks to a given EfW will be essential to ensure accurate cost pass through. A consistent approach to sampling needs to be developed so it is fair to all operators and customers. Clearly a more frequent schedule of sampling will produce more accurate outputs, but this comes at a cost, and there may not be enough organisations to be able to conduct all the sampling.

54. Do you think that the outlined sample analysis techniques (e.g. manual sorting, selective dissolution, and carbon-14) would effectively support accurate cost pass through?

(Y/N) Please give further details to support your answer.

Y

If applied to a sufficient quality standard to feedstock as in Q53. Whilst there are issues in determining actual fossil emissions per inputter it is the only way to ensure fair and transparent cost pass through and to achieve the outcomes sought. Also, there is concern that the cost associated with delivering these techniques will end up being passed through to local authorities via qualifying change in law clauses.

55. Do you think that alternatives to sampling, including default calculation factors, should be explored?

(Y/N) Please give further details to support your answer.

Y

Would reduce cost of MRV in some cases and eliminate errors in, or potential manipulation of, sampling results. However, they would need to at a customer level and verified in some way.

56. Do you think that a phased approach to the development of a cost pass through mechanism would be a practical way to proceed?

(Y/N) Please give further details to support your answer.

Y

Would enable better budget and mitigation planning as well as allowing learning from the MRV phase.

57. Do you consider that the application of the UK ETS to waste incineration will lead to any impacts for any groups with protected characteristics under the Equality Act 2010? Do you consider there to be any further equality considerations? Do you consider any elements of the UK ETS expansion to waste incineration could be designed to advance equality of opportunity and/or foster good relations? Please explain your response, providing evidence where possible.

Y

If ETS costs are passed through to local authorities there will inevitably be impacts on their ability to support groups with protected characteristics. Also, possibly through the application to HSE/ clinical waste increasing costs to vulnerable customers.

58. Do you agree that the UK ETS should be used to support heat offtake through the ETS?

(Y/N) Please outline your reasoning and provide evidence to support your views.

Y

Will help to reduce carbon through greater efficiency.

59. Do you have a view on what incentive mechanism (e.g. free allowances, subtraction of a number of allowances from the UK ETS obligation, etc.) would work best to encourage the export and utilisation of heat?

(Y/N). Please provide as much detail as possible to support your answer.

60. Do you think that policies to incentivise heat offtake should apply to surplus or waste heat, as well as heat produced for the purpose of export?

(Y/N). Please provide as much detail as possible to support your answer.

61. If an incentive is provided, how should the level of incentive be determined e.g. should it be linked to emissions that are offset by exporting heat, the volume of emissions associated with the production of heat, etc.?

(Y/N) Please provide as much detail as possible to support your answer.

62. Do you have a view as to whether incentivising heat offtake through the UK ETS could have any perverse consequences?

- (Y/N). Please provide as much detail as possible to support your answer.



## Western Riverside Waste Authority

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Contact: Rachel Espinosa

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Date: 27<sup>th</sup> February 2024

FAO Emma Bourne,  
Director Resource and Waste  
Department for Environment, Food and  
Rural Affairs  
2 Marsham Street  
London  
SW1P 4DF

Dear Emma,

### **Weekly food waste collections – indicative capital transitional costs for the introduction of weekly food waste collections**

I am writing in response to your letter to Waste Collection Authorities (WCAs) on 9<sup>th</sup> January 2024, providing details of indicative transitional capital funding for WCAs to deliver weekly food waste collections as required by the 31<sup>st</sup> March 2026, through the implementation of the Environment Act 2021 and 'Simpler Recycling'.

We note with interest the intention of the transitional funding for the purchase of food bins and food waste collection vehicles for WCAs. Western Riverside Waste Authority (WRWA) is supportive of all efforts to reduce residual waste and the associated environmental impacts.

WRWA is a statutory Joint Waste Disposal Authority (JWDA) and is responsible for managing the waste collected in its four Constituent Councils, the London Boroughs of Hammersmith & Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington & Chelsea. The Boroughs have a combined population of approximately 973,000 living in 479,000 households. WRWA manages a total of 567,367 tonnes of waste of which 377,625 tonnes is local authority collected waste.

At present only one of our constituent councils is collecting food waste at scale; the other three are carrying out trials. All four are preparing to fully implement food waste collections as required by Simpler Recycling. WRWA is currently revising its Joint Municipal Waste Management Strategy and developing an Outline Business Case for procurement of succession arrangements to its Waste Management Services Agreement (WMSA) which expires in 2032. This means that WRWA is having to plan to provide the necessary infrastructure to receive, transfer and treat c20,000 tonnes of food waste before the current WMSA ends. This may involve the purchase of additional land as well as the construction of dedicated transfer facilities.

WRWA is concerned that there does not appear to have been proper consideration of the capital costs of the necessary additional waste disposal infrastructure to support the implementation of food waste collections.

WRWA raised WDA costs in a meeting with Defra officials in January 2023 but we are yet to receive any assurance that these significant costs will be met. Because of the way that JWDAs, like WRWA, are constituted, the full costs of waste disposal including any necessary investment all has to be met by the constituent waste collection authorities. Thus, the cost of building a food waste transfer station for example, is effectively part of the cost of meeting Simpler Recycling for our collection authorities and funding this infrastructure is needed by the JWDAs.

A further consequential cost of implementing food waste collection as part of Simpler Recycling arises for WRWA and its collection authorities because it will trigger a “Qualified Change in Law” provision in the WMSA which will create a liability for compensation to our contractor. Whilst WRWA and its constituent councils are aware that an opportunity for a longer transition was offered, where long-term waste disposal contracts are in place, the boroughs understandably have not asked for dispensation under this clause because they support the environmental ambition that this request brings.

WRWA requests that Defra consider this matter carefully as it is entirely reasonable and equitable and will allow the efficient delivery of the national and local aspirations for food waste collections.

We look forward to hearing from you.

Yours sincerely,



**RACHEL ESPINOSA**  
**INTERIM GENERAL MANAGER**

## Western Riverside Waste Authority

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Contact: Rachel Espinosa

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Date: 13th June 2024

FAO Emma Bourne,  
Director Resource and Waste  
Department for Environment, Food and  
Rural Affairs  
2 Marsham Street  
London  
SW1P 4DF

Dear Emma,

### **Weekly food waste collections – indicative capital transitional costs for the introduction of weekly food waste collections**

I wrote to you on 27<sup>th</sup> February 2024 in response to your letter to Waste Collection Authorities (WCAs) on 9<sup>th</sup> January 2024, providing details of indicative transitional capital funding for WCAs to deliver weekly food waste collections as required by the 31<sup>st</sup> March 2026, through the implementation of the Environment Act 2021 and 'Simpler Recycling'. I do not appear to have received a reply to date.

Western Riverside Waste Authority (WRWA) is the statutory Joint Waste Disposal Authority (JWDA) responsible for managing the waste collected in its four Constituent Councils, the London Boroughs of Hammersmith & Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington & Chelsea. The Boroughs have a combined population of approximately 973,000 living in 479,000 households. WRWA manages a total of 567,367 tonnes of waste of which 377,625 tonnes is local authority collected waste.

WRWA has recently developed a draft Joint Municipal Waste Management Strategy and is developing an Outline Business Case for procurement of succession arrangements to its Waste Management Services Agreement (WMSA) which expires in 2032. This means that WRWA is preparing plans to provide the necessary infrastructure to receive, transfer and treat c20,000 tonnes of food waste before the current WMSA ends. This will involve the purchase of additional land as well as the construction of dedicated food waste transfer facilities.

Because of the way that JWDAs, like WRWA, are constituted, the full costs of waste disposal, including any necessary infrastructure investment, have to be met by the Constituent Councils. Thus, the cost of building a food waste transfer station for example, is

part of the cost of meeting Simpler Recycling for our waste collection authorities and funding this infrastructure is needed by the JWDAs.

WRWA is concerned that there does not appear to have been proper consideration of the capital costs of the necessary additional waste disposal infrastructure to support the implementation of food waste collections. WRWA requests that Defra consider this matter carefully as it is entirely reasonable and equitable and will allow the efficient delivery of the national and local aspirations for food waste collections.

Please can you confirm that these transitional capital costs will be met by the Government. I am of course happy to provide you with more details of the proposed investment.

We look forward to hearing from you.

Yours sincerely,



**RACHEL ESPINOSA**  
**INTERIM GENERAL MANAGER**



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5 July 2024

Frances Devane and Rachel Espinosa,  
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Wandsworth,  
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Dear Frances and Rachel,

Apologies for the late response.

Thank you for getting in touch regarding the costs on waste disposal for introducing weekly food waste collections. We have received correspondence from WDA representatives regarding this matter and are continuing to engage with them, as appropriate. If you would like to share any evidence that you have on this matter then please send this to [recycling@defra.gov.uk](mailto:recycling@defra.gov.uk).

Yours sincerely,

Clare Delaney  
Deputy Director, Resources and Waste Directorate