

Date: 25 June 2021  
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Our ref: PHCC&E Consultation



Ms Pow, Parliamentary Under-Secretary (DEFRA)  
Consistency in household recycling consultation;  
Consultation Coordinator;  
Defra 2<sup>nd</sup> Floor;  
Foss House  
Kings Pool  
1-2 Peasholme Green  
York  
YO1 7PX

Dear Ms Pow,

### **Consultation on Consistency in Household and Business Recycling in England.**

The Devon Authorities Strategic Waste Committee is a partnership body of East Devon, North Devon, Torridge, Mid Devon, South Hams and Teignbridge District Councils, Exeter City Council, West Devon Borough Council, Torbay Council and Devon County Council. We have a good track record of working together to deliver quality waste services to our residents with Devon's recycling rate of 56.6% last year being the second highest of the shire counties.

We have responded to the current consistency consultation but there are some key points that we would like to share with you. We generally support the principles behind consistency and the need to make recycling as easy as possible for residents and to manage waste as high up the waste hierarchy as possible. We also support the introduction of a separate weekly food waste collection. This ensures that wasted food is put to beneficial use by generating biogas as well as acting as an effective waste prevention tool as residents realise how much food they are actually wasting. All but one Council in Devon now operates a separately weekly food waste collection.

We, however, strongly oppose the proposed introduction of a free garden waste collection service. Again all but one council in Devon charges for garden waste collections and our residents value this service by opting in. Income derived from this service has enabled us to deliver separate weekly food waste collections. Our most recent waste analysis of the residual waste suggests that there is only 3% garden waste within our residual waste collection and so in

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Devon we will not be seeing a decrease in residual waste as a result of this policy. We are more likely to see an increase in overall garden waste tonnages as material is diverted away from home composting which is contrary to the waste hierarchy. In addition we would question the equity of the proposal whereby all council tax payers will be contributing towards the cost of the service whether they receive it or not and those without gardens tend to be in lower social-economic groups.

We also do not favour the introduction of statutory guidance around frequency of residual waste collections. East Devon have introduced an enhanced recycling service including weekly food waste collections along with 3 weekly residual waste collections. This has encouraged residents to maximise the use of their recycling service such that a residual collection every 3 weeks still meets their needs. East Devon currently recycles over 60% of their waste collected with 89% satisfaction rating from their residents regarding frequency of residual waste collections. We feel that frequency of waste collection should be a matter for local determination in consultation with local residents and not dictated by Government – one size does not fit all.

Introducing new waste services has always been subject to funding being available. Government have indicated that any new statutory requirement will be funded by New Burdens but there is currently little detail around how this will be calculated. The current annual subscription cost of our green waste collection service across Devon is around £3.5m – this figure could well be expected to double to £7m per annum if the service became a free one. New funding will be made available to councils through the EPR proposals to manage packaging materials but again there is currently little detail of what this will actually be. Our concern is that through the spending review councils may end up being worse off due to the proposed changes of funding streams and new statutory requirements and would seek reassurance from Government that this will not be the case. In addition there is little mention of funding any transition costs – implementing service changes from 2023 will require service planning and placing of orders for collection infrastructure / procurement of contracts prior to then but it is unlikely that any council will proceed with committing funding until it is certain that its costs will be met.

Thank you for the opportunity to respond to the consultation and I would request that your Government takes particular note of the issues highlighted in this letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Geoff Jung', written in a cursive style.

Councillor Geoff Jung  
Chair Devon Authorities Strategic Waste Committee