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## Introduction

The London Borough of Camden ('LB Camden') has an eight year environmental services contract with Veolia which commenced in April 2017. This covers the delivery of waste, recycling and street cleansing services in the borough. Now approaching the end of the contract period in March 2025, there is the option to extend the contract for a further eight years or consider alternative delivery models.

As part of the contract review process, LB Camden engaged ReLondon to undertake a piece of work to review the performance of the current contract against the wider London landscape, and to understand the potential impacts of upcoming policy requirements (the national collection and packaging reforms) on future service delivery. In order to evaluate the performance of LB Camden's current contract, ReLondon has carried out a benchmarking exercise which compares LB Camden's services against eight other London boroughs.

This brief report contains ReLondon's findings and highlights key insights for consideration as part of the contract review process and any strategic decisions. This work pulls from ReLondon's strategic expertise from almost 15 years' experience at the forefront of reducing waste, increasing recycling and supporting London's transition to a low carbon, circular economy. This also includes information gathered from interviews with the London Borough of Ealing and the London Borough of Hammersmith and Fulham.

# **Summary of key insights**

- LB Camden's current service delivery is outsourced to Veolia Environmental Services. Five out of eight benchmarked boroughs outsource environmental services to a private contractor. Of these, three are with Veolia. (See 1.1.1.)
- LB Camden's waste and recycling offering is consistent with service delivery across benchmarked boroughs for collections from kerbside and communal properties. LB Camden should prioritise the expansion of food waste coverage for communal properties and introduce food waste recycling for flats above shops (see 1.1.2.), new burdens funding may be available to support this (see 2.1.3)
- LB Camden's current waste arisings (297.8kg per person) rank sixth out of nine when compared with benchmarked boroughs. However, more widely, LB Camden ranks seventh across 33 London boroughs, and tenth nationally. (See 1.3.6.)
- LB Camden's current recycling rate (28.1%) ranks seventh out of nine when compared with benchmarked boroughs. LB Camden has seen an increase of 1.8% over the last 8 years. In the same time, the NLWA recycling rate and London recycling rate have decreased. (See 1.3.7.)
- LB Camden's recycling rate faces a number of challenges. LB Camden has the highest proportion of flats (87%) across all benchmarked boroughs. LB Camden also has a relatively high % of households which are deprived in 3 or 4 dimensions, and low % of household ownership. All of these influences are negatively correlated with household recycling rate. (See 1.3.8.)
- LB Camden's proposed contract extension period with Veolia coincides with the implementation of several significant developments in waste policy.
- LB Camden must act in general conformity with the Mayor's London Environment Strategy and the targets it sets out. LB Camden should refer to the GLA's guidance on waste contract procurement and waste strategies review as part of the contract review process and any strategic decisions. LB Camden should also stay informed with the development of the NLWA's new Joint Waste Strategy as it progresses in order to ensure strategic alignment and understand any impacts for its disposal contract. (See 2.2.)

# 1. Benchmarking

In order to evaluate the performance of LB Camden's current contract, ReLondon has carried out a benchmarking exercise which compares LB Camden's services against eight other London boroughs. These boroughs were selected in consultation with LB Camden to provide a range of geographical and demographic nearest neighbours, as well as other boroughs of interest:

Borough	Reason for benchmarking
London Borough of Hackney	NLWA borough In-house service delivery
London Borough of Hammersmith and Fulham ('LB H&F')	Nearest socioeconomic and demographic neighbour <sup>1</sup> ('nearest neighbour') Recently moved services from Serco to Veolia
London Borough of Islington	NLWA borough Nearest neighbour In-house service delivery
Royal Borough of Kensington and Chelsea ('RBKC')	Nearest neighbour Contract with SUEZ
London Borough of Lambeth	Recently moved services from Veolia to Serco
London Borough of Southwark	Nearest neighbour PFI contract with Veolia
London Borough of Brent	Contract with Veolia Outer London borough comparison
London Borough of Ealing	Requested by LB Camden  Local Authority Trading Company  Outer London borough comparison

Figure 1 Reasons for selecting boroughs for benchmarking

Benchmarking has included evaluation of service delivery model, waste and recycling services, street cleansing services, contract management and recycling rates. (Section 1.1.3 on street cleansing was prepared by Keep Britain Tidy on behalf of ReLondon.)

<sup>&</sup>lt;sup>1</sup> Nearest neighbours identified using five closest local authorities by Squared Euclidean Distance (SED) value based on ONS area classifications 2011. These use socioeconomic and demographic data from each census to identify areas of the country with similar characteristics.

## 1.1. Service delivery

## Contractor vs. in-house

There are 3 principal models for the delivery of local environmental services:

## 1. Outsourcing to a private contractor

A private contractor is appointed through a formal competitive public procurement exercise. This contractor delivers waste collection and/or street cleansing services on behalf of a local authority, and must maximise their performance against agreed KPIs. The division of roles and responsibilities varies with individual contracts, as discussed further in 1.2. These arrangements can benefit from private contractors' economies of scale, and have been reported to deliver higher recycling performance and better value for money<sup>2</sup>. This is LB Camden's current service delivery model with Veolia Environmental Services.

#### 2. In-house delivery via a direct service organisation ('DSO')

Services are delivered directly by a local authority through in-house operations, with no requirement for a competitive public procurement process. In -house delivery provides an authority with greater control and flexibility over it's operations, however requires significant capital investment and ongoing management and can be restricted by local authority governance.

#### 3. Local Authority Trading Company ('LATCo' or 'LAC')

LATCos are bodies that are free to operate as commercial companies but remain wholly owned and controlled by the parent council. These companies can be established by a local authority without the requirement for a public procurement exercise under the Teckal exemption codified in the Public Contracts Regulations 2015<sup>3</sup>. A LATCo allows a local authority greater control over service delivery while delivering services more commercially than an in-house operation. However, the process of establishing a LATCo can be complicated and resource intensive, usually requiring multiple external consultants.

<sup>3</sup> The Public Contracts Regulations 2015

<sup>&</sup>lt;sup>2</sup> The Effects of Competition on Municipal Waste Collection Performance - Eunomia

Of the 8 benchmarked boroughs:

Five outsource to private contractors: Serco (LB Lambeth), Suez (RBKC) and Veolia (LB Brent, LB H&F, LB Southwark).

Two operate in-house (LB Islington and LB Hackney)

One operates via a LATCo (LB Ealing via Greener Ealing)

The lengths of these contracts and potential for extensions are listed below in Figure 2.

A full register of waste contracts across London can be found on the London Datastore<sup>4</sup>.



	Delivery	Start date	End date	Potential extension
LB Camden	Veolia	April 2017	2025	+ 8 years
LB Hackney	In-house	Mar 2013	N/A	N/A
LB H&F	Veolia	Jan 2023	2032	+ 8 years
LB Islington	In-house	Jun 2013	N/A	N/A
RBKC	Suez	Apr 2021	2029	+ 8 years
LB Lambeth	Serco	Oct 2021	2027	+ 8 years
LB Southwark	Veolia (PFI contract <sup>5</sup> )	Feb 2008	2033	Unknown
LB Brent	Veolia	April 2014	2023	+ 7 years (confirmed)
LB Ealing	LATCo (Greener Ealing)	July 2020	2025	+ 5 years (confirmed)

Figure 2 Contracts and potential extensions across benchmarked boroughs

<sup>&</sup>lt;sup>4</sup>London Datastore - Waste Contracts Register

<sup>&</sup>lt;sup>5</sup> PFI contracts set out a long-term agreement between the private and public sector to deliver infrastructure projects which are returned to the authority once the contract ends. In 2008 Southwark entered a 25-year PFI contract with Veolia to deliver waste collection and disposal in the borough and construct a state-of-the art waste and recycling centre on the Old Kent Road, which houses an RRC, MRF and MBT plant. In October 2018, government announced it would no longer use the PFI model. Existing PFI contracts remain in place and some (e.g. ELWA/Renewi) are now starting to expire.

Considering the most recent changes:

• LB Ealing moved the delivery of their environmental services contract to a newly established LATCo named Greener Ealing Ltd ('GEL') in July 2020.

LB Ealing had previously outsourced this contract to Amey since 2012, but negotiated an early exit after 8 out of 15 years based on poor performance. Amey were losing money on the contract and there were recurring operational issues around street cleansing, repeat missed collections and vehicle maintenance. The decision to establish a LATCo followed an options appraisal prepared by Eunomia. This assessment showed the following estimated service costs per annum:

In-house £16.97m Outsourced £17.08m LATCo £16.36m

This recommendation was brought before Cabinet in March 2018; further detail can be found in the meeting documents<sup>6</sup>. A significant project team and schedule of work was required by LB Ealing to build the LATCo. John Arnold (Contracts & Performance Manager, Street Services) was moved across from the previous Amey team to oversee this process in November 2018. John commented that the lead times for procurement of vehicles and IT systems were particularly important to consider<sup>7</sup>.

LB Lambeth changed contractor from Veolia to Serco in October 2021.

LB Lambeth's previous recycling, waste and cleansing contract with Veolia was set to end on 31 March 2021 and was extended for 6 months due to procurement delays because of the pandemic. Following an options appraisal, it was decided the most effective delivery model would be to continue to outsource the contract to a specialist provider. A Competitive Dialogue procurement route was chosen, with Eunomia appointed as technical and commercial advisors. Out of two final bidders, Serco scored higher in both the quality and finance parts of the tender, demonstrating savings of £2 million each year. The recommendation for contract award was brought before Cabinet on 8<sup>th</sup> February 2021<sup>8</sup>. The initial six-year agreement is worth £118.7 million. Key changes with new contract include:

- Expansion of food waste collections to estates, with an additional 3,000 homes to receive food waste collection services at no additional cost.
- Expanding collections to small WEEE, batteries and textiles.
- Bringing the fleet of vehicles back under council control; a new ULEZ-compliant fleet with electric bin lifts purchased by the authority. One electric RCV purchased as part of a phased fleet replacement programme, aiming for a completely electric fleet by 2030.
- Co-ordinated collections and cleansing on Lambeth housing estates to improve cleansing standards.
- Graffiti removal service now included.

<sup>&</sup>lt;sup>6</sup> London Borough of Ealing - Cabinet Meeting 20th March 2018

<sup>&</sup>lt;sup>7</sup> Taken from an interview with LB Ealing on 18th April 2023.

<sup>&</sup>lt;sup>8</sup> London Borough of Lambeth - Cabinet Meeting 8th February 2021

- Bringing elements of the community outreach programme in-house.
- LB Hammersmith and Fulham changed contractor from Serco to Veolia in January 2023.

LB H&F's previous contract with Serco expired on the 29<sup>th</sup> January 2023. Similarly to LB Lambeth, an options appraisal determined that commissioning the services via a specialist provider minimised the risk to the council and maximised private sector expertise, opportunities for economies of scale, and the use of technology to drive performance improvements. A Competitive Dialogue procurement route was chosen, with two final bidders. Veolia scored higher in both the quality and finance parts of the tender. The recommendation for contract award was brought before Cabinet on 10<sup>th</sup> October 2022<sup>9</sup>. The initial nine-year agreement is worth £146 million. Key changes with the new contract include;

- The introduction of food waste collections for all eligible households as part of the core contract price. The roll out of the food waste collection service will commence as soon as the necessary vehicles and equipment have been obtained.
- The flexibility to provide two provisional services; collection of garden waste (if required by legislation, assumed to be a free of charge service to residents at tender stage), and containerised collection of household waste.
- Moving the entire waste fleet to zero emission vehicles over the contract's life.
- Enhanced KPIs around waste collection and street cleansing. For example, reducing the time allowed to collect fly tipped and abandoned waste from 48 hours to 24 hours.

## Service delivery: key insights

- There are three principal models for the delivery of local environmental services: outsourcing, in-house delivery, or LATCo. An options appraisal should be used to assess the relative costs and benefits for each.
- LB Camden's current service delivery is outsourced to Veolia Environmental Services. Outsourcing can benefit from private contractors' economies of scale, and has been reported to deliver higher recycling performance and better value for money.
- Five out of eight benchmarked boroughs outsource environmental services to a private contractor. Of these, three are with Veolia.
- More widely, 19 out of the total 33 London boroughs outsource to a contractor; 11 are with Veolia. 12 deliver services in-house. Only two deliver through a LATCo (LB Ealing and LB Hounslow).
- Both LB Lambeth and LB H&F recently moved their recycling, waste and cleansing services
  to a new contractor. Key themes across these contracts include the expansion of food
  waste collections and electification of vehicle fleet.

<sup>&</sup>lt;sup>9</sup> London Borough of Hammersmith and Fulham - Cabinet Meeting 10th October 2022

## Waste and recycling services

The waste and recycling service offering across benchmarked boroughs is listed in Figure 3 (page 12) for kerbside properties and Figure 4 (page 13) for flats and flats above shops ('FLASH').

#### For kerbside collections;

- LB Camden offers either weekly or fortnightly residual waste collections, weekly dry mixed recycling collections and weekly food waste collections to kerbside properties. Garden waste is offered as a chargeable weekly collection.
- Four out of eight benchmarked boroughs offer fortnightly residual waste collections for kerbside properties. For three of these, this is an alternate weekly schedule with dry mixed recycling. Alternate weekly collections ('AWC') are intended to encourage participation in both dry and food waste recycling by restricting the extent to which recyclable waste can be put into residual waste bins. This also releases local authority resources to support a high quality recycling service<sup>10</sup>.
- All benchmarked boroughs offer comingled collections for dry mixed recycling. However, LB
  Brent will be introducing an alternate weekly twin stream collection for all kerbside
  households in Brent (84,000) from 1st October 2023 as part of their contract extension with
  Veolia. The initial containerisation will be a 240l wheelie bin for containers and a 75ltr sack
  for paper/card.
- Six out of eight benchmarked boroughs offer weekly food waste collections to 100% of kerbside properties. RBKC and LB H&F only offer this to 6% and 7% of households respectively. RBKC plan to double this coverage in 2023, and LB H&F plan to roll out food waste borough wide within the next 2 years as part of their new contract with Veolia.
- Seven out of eight boroughs offer garden waste collections; two for free. LB H&F removed their garden waste collection in favour of home composting.

#### For flats / communal collections;

- All boroughs (including LB Camden) offer communal residual waste and dry mixed recycling services, collected weekly (at least).
- LB Camden offers communal food waste collections to 50% of flats, collected weekly. Communal food waste coverage varies significantly across benchmarked boroughs. Five out of eight boroughs only offer food waste collections to <10% flats. However, all boroughs have included commitments to expanding this service in their most recent Reduction and Recycling Plan ('RRP') (see 2.2.4).

#### For FLASH collections:

- All boroughs (including LB Camden) offer residual waste and dry mixed recycling sacks to FLASH.
- Only two benchmarked boroughs offer food waste collections to flats above shops. LB
   Hackney offer this service to 20% of FLASH residents by guiding them to use communal bins.
   LB Ealing offer this service to 20% FLASH residents where the properties are included in
   alternate weekly kerbside collections.

<sup>&</sup>lt;sup>10</sup> <u>Alternate weekly collections guidance</u> - WRAP (update expected imminently)

• LB Islington and LB Hackney have both recently trialled food waste collections from FLASH using on-street communal bins. Results of these trials showed ~0.38kg and ~0.45kg collected per week per household, which equates to increases in recycling rate of +0.33% and +0.2% respectively if rolled out borough wide. It is understood that LB Camden is currently considering a trial. ReLondon are developing resources around FLASH which will include funding for boroughs interested in running trials for recycling and/or food waste.

ReLondon have not included commercial waste services in discussion.

### Waste and recycling: key insights

- LB Camden's waste and recycling offering is consistent with service delivery across benchmarked boroughs for collections from kerbside and communal properties.
- Four out of eight benchmarked boroughs offer fortnightly residual waste collections for kerbside properties. For three of these, this is an alternate weekly schedule with dry mixed recycling.
- All benchmarked boroughs offer comingled collections for dry mixed recycling.
  However, LB Brent will soon be introducing twin stream for kerbside properties. More
  widely, 24 out of the total 33 London boroughs offer comingled collections. Eight offer
  twin stream, and one (LB Hounslow) offers multi-stream collections.
- LB Camden should prioritise the expansion of food waste coverage for communal properties and introduce food waste reycling for flats above shops. LB Camden's 2023/25 RRP includes actions on this.
- It is understood that LB Camden is currently considering a trial for food waste collections from FLASH. ReLondon are developing resources around FLASH which will include funding for boroughs interested in running trials for recycling and/or food waste.

Borough	LB Camden	LB Hackney	LB H&F	LB Islington	RBKC	LB Lambeth	LB Southwark	LB Brent	LB Ealing
Kerbside residual waste	140L - 240L bin	Sacks / 180L bin	Sacks / 140L bin (prototype scheme)	Sacks	Sacks	140L bin (120L per household for HMOs)	180L - 240L bin	Sacks (busy routes) / 140L bin	180L bin
	Weekly / Fortnightly	Fortnightly	Weekly	Weekly	Twice weekly	Weekly	Fortnightly	More than weekly (busy routes) / Fortnightly	Fortnightly
Kerbside	40L box / 60L sacks / 140L - 240L bin	Sacks	Sacks / 240L bin (prototype scheme)	55L box	Sacks	240L - 360L bin	180L - 240L bin	Sacks (busy routes) / 180L - 240L bin	Box / Sacks / 240L bin
recycling	Weekly	Weekly	Weekly	Weekly	Twice weekly	Weekly	Fortnightly	More than weekly (busy routes) / Fortnightly	Fortnightly
Kerbside food	100% coverage	100% coverage	7% coverage (prototype scheme)	100% coverage	6% coverage	100% coverage	100% coverage	99.5% coverage	100% coverage
waste <sup>11</sup>	7L and 23L caddy	7L and 23L caddy	7L and 23L caddy	7L and 23L caddy	7L and 23L caddy	7L and 23L caddy	7L and 23L caddy	7L and 23L caddy	7L and 23L caddy
	Weekly	Weekly	Weekly	Weekly	Weekly	Weekly	Weekly	Weekly	Weekly
	3 x 80L reusable sacks / 240L bin	90L reusable sacks / 140L bin	No service	Sacks	Reusable sacks	Biodegradable or reusable sacks	240L bin	180L - 240L bin	Biodegradable or reusable sacks / 240L bin
Kerbside garden waste	Weekly (chargeable)	Fortnightly (free)		Weekly (free)	Fortnightly (chargeable)	Weekly (chargeable)	Weekly (chargeable)	Fortnightly Mar- Nov Weekly Dec-Feb (chargeable)	Fortnightly (chargeable)
	Separate	Separate		Mixed with food waste on vehicle	Separate	Mixed with food waste on vehicle	Separate	Separate	Separate

Figure 3 Kerbside service offering across benchmarked boroughs

Borough	LB Camden	LB Hackney	LB H&F	LB Islington	RBKC	LB Lambeth	LB Southwark	LB Brent	LB Ealing
Flats residual	60L sacks / 1100L bin	1100L bin	Various 360L + bin	240L bin / 1100L bin	1100L bin	360L to 1280L bin	Communal wheeled bin	Communal wheeled bin	Communal wheeled bin
waste	Weekly	Weekly / more than weekly	Weekly	Weekly	Twice weekly	Weekly / more than weekly	Weekly / more than weekly	Weekly	Weekly
Flats recycling	1100L bin	1100L bin	360L bin	1100L bin	1100L bin	360L - 1280L bin	360L bin	360L bin	Sacks / 360L bin
riats recycling	Weekly	Weekly / more than weekly	Weekly	Weekly	Weekly	Weekly / more than weekly	More than weekly	Weekly	Weekly
	50% coverage	88% coverage	0% coverage	40% coverage	1.5% coverage	0% coverage	10% coverage	100% coverage	5% coverage
Flats food waste <sup>11</sup>	7L caddy and 240L bin / 550L bin	7L caddy and 140L bin	N/A	7L caddy and 240L bin	7L caddy and Communal wheeled bin	N/A	7L caddy and 240L bin	7L caddy and Communal wheeled bin	7L caddy and 240L bin
	Weekly	Weekly	N/A	Weekly	Weekly	N/A	Weekly	Weekly	Weekly
FLASH residual	90L sacks	Sacks	Sacks	Sacks	Sacks	Sacks	Sacks	Sacks	Sacks
waste	Time banded	Time banded	Daily	Weekly	Weekly / more than weekly	Daily	Weekly	More than weekly	Weekly
FLASH	90L sacks	Sacks	Sacks	Sacks	Sacks	Sacks	Sacks	Sacks	Sacks
recycling	Time banded	Time banded	Daily	Weekly	Weekly / more than weekly	Weekly	Weekly	More than weekly	Weekly
	0% coverage	20% coverage	0% coverage	0% coverage	0% coverage	0% coverage	0% coverage	0% coverage	20% coverage
FLASH food waste	N/A	Guided to communal bins	N/A	N/A	N/A	N/A	N/A	N/A	Where properties are included in kerbside AWC with wheelie bins

Figure 4 Flats and FLASH service offering across benchmarked boroughs

<sup>&</sup>lt;sup>11</sup> Coverage figures taken from 2019/20 baseline provided in 2023/25 RRPs.

## Street cleansing services

Street cleansing is a significant component of LB Camden's contract with Veolia. In order to benchmark these services, Keep Britain Tidy ('KBT') interviewed six of the eight benchmarked boroughs (LB Hackney, LB H&F, LB Islington, RBKC, LB Brent and LB Ealing) and LB Camden. (KBT did not receive a response to enquiries sent to LB Lambeth and LB Southwark and there is therefore no information from these boroughs.)

The reporting for Local Environmental Quality ('LEQ') and street cleansing is not as standardised and readily available as waste and recycling data. Many boroughs self-report LEQ surveys for cleanliness and the efficacy of services can depend upon resident's perceptions of 'clean' areas. It is therefore difficult to draw absolute comparisons, however the following discussion is based on KBT's expertise and insights gathered from interviews.

#### LEQ surveys

National Indicator 195 is the street cleanliness performance indicator measuring levels of litter, detritus, graffiti and fly-posting in our streets and neighbourhoods. All councils in England must survey their areas regularly and report standards of cleanliness to Defra. LEQ surveys are delivered either in-house or contracted out to an independent body. LB Camden contract this service to KBT, and three out the six benchmarked boroughs also contract this service out, either to KBT or Tetra Tech. The remaining boroughs deliver surveys in-house (self-report). Figure 5 KBT LEQ benchmarking scores (Source: KBT)lists KBT's LEQ benchmarking scores.

The percentage figures represent the 50 metre transects that have failed to meet grading standards as a percentage of the total transects surveyed (i.e. a lower percentage indicates a better score).

	Litter	Detritus	Fly-posting	Graffiti
London benchmark 2022- 23	9.37%	12.57%	3.09%	7.44%
London benchmark 2022- 23 (Excluding City of London)	10.08%	13.76%	3.34%	7.91%
Inner London Benchmark	6.41%	6.58%	3.54%	9.05%
Outer London	12.92%	19.75%	2.55%	5.50%
National Litter Survey 2022-23	6.08%	11.95%	0.76%	2.41%
LB Camden 2022-23	7.31%	5.02%	5.36%	11.81%

Figure 5 KBT LEQ benchmarking scores (Source: KBT)

LB Camden has better NI 195 scores for litter and detritus when compared with the London benchmark, and similar scores to the inner London benchmark, but worse NI195 scores for fly-posting and graffiti when compared with the London benchmark and national picture. Higher levels of fly posting can be attributed to LB Camden's vibrant nighttime economy. LB Camden also recognised they had a particular issue with graffiti during interview and highlighted problem areas such as private land and

transport hubs. They did state that Veolia have a 99% graffiti removal rate in line with their SLA.

Borough	LB Camden	LB Hackney	LB H&F	LB Islington	RBKC	LB Brent	LB Ealing
NI 195 monitoring	Keep Britain Tidy	Keep Britain Tidy	Tetra Tech	In-house	In-house	In-house	Tetra Tech
System	Outcome based	Schedule	Schedule	Schedule	Outcome based	Outcome based	Schedule
Mechanical	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>
Manual	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>
Frequency of sweeping and cleansing	Daily on high footfall areas e.g. Camden High St, transport hubs.  Nothing less than weekly in the rest of borough.	Main roads three times per day including weekends. Secondary main roads daily.  Residential streets a minimum of two times per week with higher footfall three times per week.	Scheduled	24/7 for all the main drags (zone 1). Side roads four times per week.	Daily on high footfall areas e.g. Earls Court/Fulham Road. Covered by three shifts and additional caged vehicles in the evenings.  SUEZ have one day rectification time within the contract.	Zones follow Defra's Code of Practice, i.e. high, low density and so on. Local knowledge impacts sweeping frequencies.	Daily for zone 1, 8am- 8pm. Cleansed to Grade A standard. Residents roads every 12 weeks (four times per year).
Frequency of emptying bins	Daily	Daily	Scheduled	Every day if over half full	Emptied when over 80% full	Daily	Daily
Frequency of stain removal	Ad-hoc	Ad-hoc	Unknown	Ad-hoc	Ad-Hoc	Ad-hoc	Ad-hoc

Figure 6 Street cleansing across benchmarked boroughs

### • Focus for street cleansing

All boroughs are Principal Litter Authorities with a statutory duty to ensure that relevant land in their area is, so far as is practicable, kept clear of litter and refuse. The Code of Practice on Litter and Refuse<sup>12</sup> provides guidance for maintaining land within acceptable cleanliness standards. The emphasis is on the consistent and appropriate management of an area to *keep* it clean, not on how often it is cleaned. This includes the following:

- 1. Different categories (zones) of land of high, medium and low intensity use.
- 2. Four grades of cleanliness, i.e. for litter;
  - Grade A no litter or refuse
  - Grade B predominantly free of litter and refuse
  - Grade C widespread distribution of litter and/or refuse with minor accumulations
  - Grade D heavily littered with significant accumulations of litter and refuse.
- 3. A target response time to restore an area of land (zone) to an acceptable standard (grade) if it falls below that standard.

LB Camden changed to a flexible system for street cleansing in April 2017. The previous system was schedule based, with frequency ranging from twice daily to a minimum of once weekly. The new system is outcome based. All streets must be no lower than Grade B at all times and are required to be cleansed to Grade A standard. This is delivered on a priority basis - whereby streets are monitored and swept as needed. This approach allows flexibility of resources, however requires sufficient incoming information on the condition of streets so Veolia can respond. The public are a key part of this system, reporting issues online and via the Love Clean Streets app<sup>13</sup>.

RBKC and LB Brent also use an outcomes and priority based approach. The remaining four out of six benchmarked boroughs follow a schedule for cleansing.

#### Approach to street cleansing

All benchmarked boroughs (including LB Camden) use a mixture of both mechanical and manual barrowman delivery. LB Islington recently changed their approach from a team sweep (one driver and two operatives) to barrow beats. Both LB Islington and LB Ealing commented that having a barrow beat with their own patch encourages more ownership and responsibility and this has led to a much more effective service.

#### • Frequency of street cleansing activities

LB Camden sweeps all main roads/high footfall areas (zone 1 areas) daily, which is the minimum standard across five of the six benchmarked boroughs. LB Hackney sweeps main roads three times per day, and secondary main roads daily. This is due to a strong political will within the borough regarding street cleanliness, however at a significant cost to the service.

<sup>&</sup>lt;sup>12</sup> Code of Practice on Litter and Refuse

<sup>13</sup> Love Clean Streets

LB Camden sweeps all remaining routes in the borough no less than weekly. It is difficult to compare schedules for side roads and residential areas as information from boroughs is not clear as to the classifications for these routes. Information reported is shown in Figure 6.

#### Emptying bins

LB Camden empty street litter bins daily, as do four out of six benchmarked boroughs. LB Islington empty if over half full and RBKC if over 80% full.

#### Stain removal

Due to the nature and expense of stain removal, this is done on a more ad-hoc basis or if there is a particular need (e.g. blood, vomit). RBKC highlighted that they try to educate businesses to double bag their waste and set it on cardboard to avoid staining.

## · Operational policies and procedures

LB Camden stated that they have a good reporting system with Veolia and a 90% of issues are handled within rectification time defined in the contract.

LB Camden has a mixture of electric, diesel and hybrid vehicles. Vehicle electrification was mixed across the benchmarked boroughs with some just starting to trial electric vehicles, with less understanding of the implications on the day to day running of them, such as power supply and recharge.

## Street cleansing: key insights

- LB Camden contract LEQ NI195 monitoring to KBT. LB Camden have better NI 195 scores for litter and detritus when compared with the London benchmark, and worse NI195 scores for fly-posting and graffiti when compared with the London benchmark.
- LB Camden changed street cleansing to an outcome based approach in April 2017. RBKC and LB Brent also use an outcome based approach. This allows flexibility of resources, however requires sufficient incoming information on the condition of streets so Veolia can respond quickly.
- All benchmarked boroughs (including LB Camden) use a mixture of both mechanical and manual barrowman delivery.
- LB Camden sweeps all main roads/high footfall areas (zone 1 areas) daily. This is the minimum standard across five of the six benchmarked boroughs.
- LB Camden's approach to emptying bins and stain removal reflects the standard approach aross six benchmarked boroughs.

## 12 Contract management

Staffing structures across environmental services vary between boroughs. For comparison, ReLondon have included boroughs with varying service delivery models below.

## LB Hackney

LB Hackney's recycling service was brought in-house in 2013, joining an already in-house residual waste service. The service is operated from Millfields Depot as a key component of the environmental services team; waste and recycling, street cleansing, hygiene services and commercial waste. As well as these operational teams, there is a strategic team which works closely delivering on resident engagement, communications and strategy development, and an administration function. Service performance is managed against a range of KPIs including monthly reporting on missed collections, complaints numbers / response rates, and recycling rates.

## LB Ealing

In July 2020 LB Ealing moved the delivery of their environmental services contract to a newly established LATCo named Greener Ealing Ltd ('GEL'). LB Ealing maintained the same contract management structure with Greener Ealing as previously with their contractor Amey. In general, waste strategy, education and outreach are managed by the council within the waste and street services team. The council also manage customer service and escalations. At Greener Ealing, operations managers across street cleansing, collections and grounds and other heads of department report into a managing director. As an independent company, Greener Ealing is managed by it's own board. LB Ealing commented that there is a much better attitude and the working relationship with Greener Ealing is not as rigid as with an external contractor<sup>14</sup>.

LB Ealing maintained like-for-like KPIs in order to monitor the performance of Greener Ealing in comparison with Amey. Key KPIs are summarised in Figure 7 and demonstrate significant improvements following the move to GEL.

KPI	Target	19/20 Amey	20/21 GEL	21/22 GEL	22/23 GEL
Missad Postification %	100% within 24 Hours	72%	Ω1%	100%	100%
Right First Time %	-	99.84%	99.95%	99.96%	99.97%
Assisted Missed Collections	Zero	30	9	10	9
Missed per 100k by Service:					
Refuse	< 100	263	56	42	45
Recycling	< 100	284	57	35	40
Food	< 100	114	44	47	43
Garden	< 100	578	158	233	37
Bulky Waste Service	100%	94%	99%	92.00%	98.88%
Number of Complaints	-	170	167	62	27

<sup>&</sup>lt;sup>14</sup> Taken from interview with LB Ealing on 18th April 2023.

Flytips SLA	95%	96%	84%	95.00%	98.08%
Combined Streets A&B Inspection	85%	67%	81.10%	91.92%	94.74%
Figure 7 Annual KPI scores for LB Ealing					

## Contract management: key insights

• Contract management structures vary according to service delivery model.

## 1.3. Recycling rates

Local authority waste arisings and household waste recycling rates are reported annually by Defra<sup>15</sup> (based on local authority data returns made through WasteDataFlow). These figures are used by Government to track the recycling performance of local authorities and measure progress towards policy targets (see section 2).

## Waste arisings

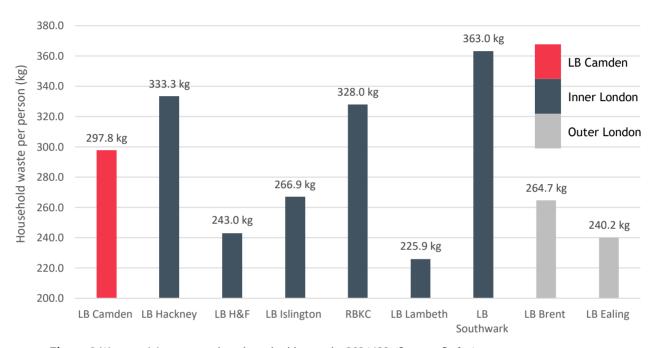


Figure 8 Waste arisings across benchmarked boroughs 2021/22 (Source: Defra)

Figure 8 shows the waste arisings across benchmarked boroughs for 2021/22 (the last year for which data is available). LB Camden ranks sixth out of nine benchmarked boroughs for household waste per person. However, more widely, LB Camden ranks seventh across 33 London boroughs, and tenth nationally. This is an impressive ranking, and is likely due to a range of socioeconomic and demographic factors which impact LB Camden's residents' habits and waste generation. This is discussed further in 1.3.8.

## Overview of recycling rates

Figure 9 (page 17) lists recycling rates across the benchmarked boroughs over the last eight years; Figure 10 (page 18) displays this graphically.

<sup>&</sup>lt;sup>15</sup> Defra: Local authority collected waste management - annual results 2021/22. Collected household waste per person (kg) (Ex BVPI 84a) and Percentage of household waste sent for reuse, recycling or composting (Ex NI192). The 'waste from households' classification introduced in 2014 (which aligns with the Waste Framework Directive (2008/98/EC)) excludes local authority collected waste types not considered to have come directly from households, such as street bins, street sweepings, parks and grounds waste and compost-like output, but does includes metal recovered and recycled from IBA.

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	% change 2014/15- 2021/22	% change 2020/21- 2021/22
Inner London										
LB Camden	26.3	24.8	26.6	30.3	31.1	25.9	28.6	28.1	+1.8	-0.5
LB H&F	20.7	22.0	23.2	23.7	23.8	25.5	27.5	26.3	+5.6	-1.2
LB Hackney	25.3	24.8	27.0	27.4	27.9	28.3	28.1	29.1	+3.8	+1.0
LB Islington	32.8	29.4	31.6	29.5	29	29.6	31.3	30.1	-2.7	-1.2
RBKC	25.3	25.9	25.7	26.2	27	28.6	24.2	23.1	-2.2	-1.1
LB Lambeth	28.3	28.7	28.8	29.8	30.1	31.7	36.4	34.5	+6.2	-1.9
LB Southwark	34.6	35.0	34.0	34.7	35.2	35.1	32.5	35.7	+1.1	+3.2
Outer London										
LB Brent	35.2	35.8	36.4	36.5	36.6	34.2	33.4	37.8	+2.6	+4.4
LB Ealing	40.1	43.0	50.7	48.8	52.6	48.3	49	47.6	+7.5	-1.4
Other										
NLWA	33.3	33.2	32.2	31.2	29.6	29.1	28.5	28.4	-4.9	-0.1
London	33.1	32.0	33.0	33.1	33.4	33.5	33	32.7	-0.4	-0.3

Figure 9 Recycling rates across benchmarked boroughs (Source: Defra)

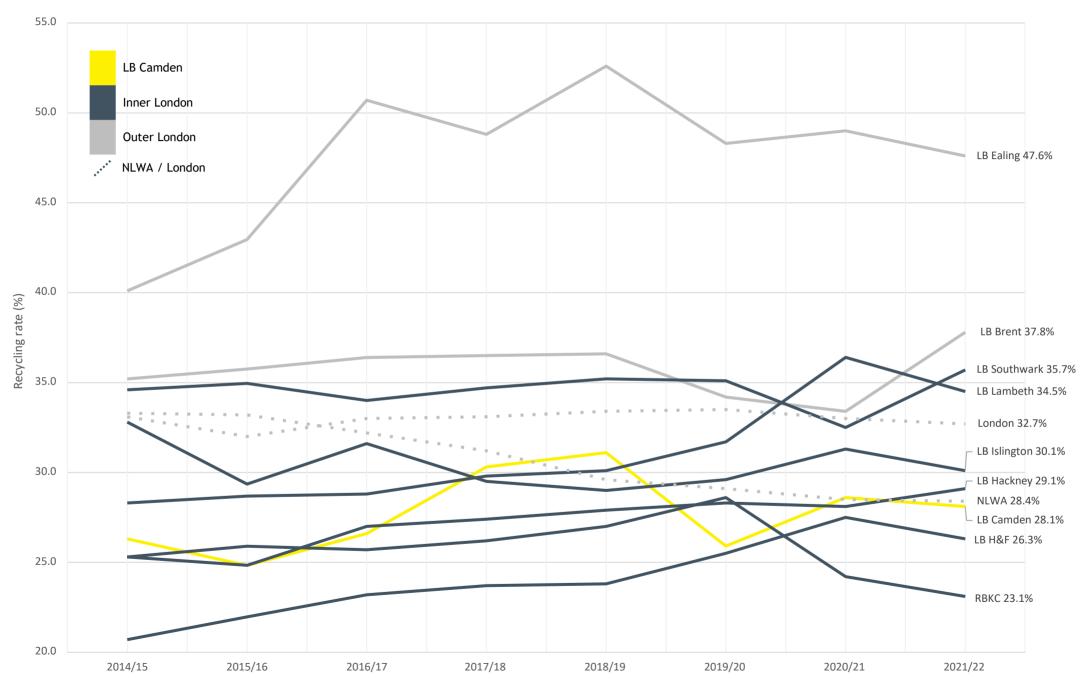


Figure 10 Recycling rates across benchmarked boroughs (Source: Defra)

Based on 2021/22 data, LB Camden's recycling rate (28.1%) ranks seventh out of nine when compared with the benchmarked boroughs (or fifth out of the seven inner London boroughs). This is 0.3% lower than the NLWA recycling rate (28.4%) and 4.6% lower than the London recycling rate (32.7%). LB Camden's recycling rate decreased by 0.5% between 2020/21 and 2021/22. This year also saw decreases in the NLWA (-0.1%) and London (-0.3%) recycling rates.

LB Camden's recycling rate saw a significant decrease (-5.2%) between 2018/19 and 2019/20. LB Camden attribute this to a number of factors<sup>16</sup>:

- A miscategorisation of residual waste in previous years.
- An overall reduction in the amount of recycling collected from households.
- An increased amount of LB Camden's recycling that was discounted from the recycling total as a result in changes to the way tonnages are processes at NLWA's transfer stations.

Despite this, LB Camdens' recycling rate has increased by 1.8 percentage points over the last eight years. In the same time period, both the NLWA and the London recycling rates have decreased by 4.9% and 0.4% respectively. LB Camden's increase also performs well when compared with nearest neighbours LB Islington (-2.7%), RBKC (-2.2%) and LB Southwark (+1.1%).

As evident in Figure 10, LB Ealing maintains significantly higher recycling rates than the rest of the group (47.6% for 2021/22). This is likely due to a combination of restricted residual capacity (180L fortnightly), alternate weekly collections for both residual waste and dry recyclate, and the contribution of garden waste tonnages due to much lower proportion of flats as an outer London borough. Factors influencing recycling rates are discussed further below.

## Factors influencing recycling rates

There are a number of challenges challenges which influence weight based recycling performance for densely populated urban local authorities;

#### Proportion of flats

All evidence shows that recycling rates for communal flat collections are significantly lower than those from individual household kerbside collections. This is due to a complex set of circumstances which include the communal nature of collections, inconsistent and often poor collection provision (including old or inadequate collection infrastructure, such as poor bin storage arrangements), and a lack of knowledge, ownership and engagement from residents. ReLondon's recent waste composition analysis work<sup>17</sup> shows the average composition of waste from communal bins and kerbside (individual household) bins in London is very similar in terms of the proportions of dry materials and food waste disposed of by households in each property type, but that there are large disparities in the capture rates. On average, 77% of dry recycling and 36% of food waste is captured for recycling from kerbside properties - compared with 50% and 20% respectively for communal properties (where a food waste service is offered).

Therefore, ReLondon would expect to see lower recycling rates in boroughs with a higher proportion of flats. This is an increasing challenge; it is expected that 46% of London's households will be living in purpose-built flats by 2030.

<sup>17</sup> ReLondon's waste composition analysis is currently being finalised and a briefing note will be available in the near

<sup>&</sup>lt;sup>16</sup> Taken from LB Camden's RRP update December 2021.

ReLondon have developed the Flats Recycling Package<sup>18</sup> to support London boroughs to improve dry recycling and food waste recycling rates from existing purpose-built flats, and worked with LB Tower Hamlets to develop a supplementary planning guidance<sup>19</sup>.

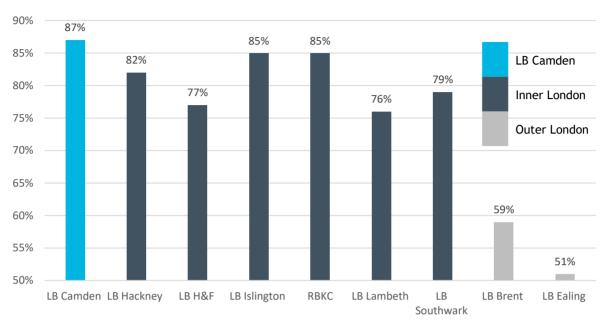


Figure 11 % flats across benchmarked borough (Source: ONS census 2021)

As shown in Figure 11 % flats across benchmarked borough (Source: ONS census 2021) LB Camden has the highest % of flats across all benchmarked boroughs. This is taken from census data for accommodation type<sup>20</sup>, so it's likely that the % of properties receiving communal collections is lower in reality (this figure includes maisonettes and flats above shops which may receive kerbside/alternative collections). However, this is a good indicator of the level of challenge for collections and recycling rate that LB Camden faces in comparison with other London boroughs, in particular outer London boroughs.

#### • Garden waste collections

London has fewer and smaller gardens than other English regions - particularly in inner London boroughs, with a higher proportion of flats - producing less green (heavy) waste. Lack of garden waste (which in other regions and housing contexts has a high separation rate) in communal waste streams means that recycling rates for dense urban environments are unlikely to ever reach kerbside levels (as long as garden waste is counted towards recycling rates). This means that increasing recycling rates requires focus on increasing the capture of other materials.

Figure 12 (see page 22) shows the breakdown of 2021/22 recycling rates across benchmarked boroughs based on WasteDataFlow inputs for the 2021/22 financial year<sup>21</sup>. These figures demonstrate that LB Camden's Dry Mixed Recycling (DMR) recycling rate ranks sixth out of nine when compared with the benchmarked boroughs (or fourth out of the seven inner

<sup>&</sup>lt;sup>18</sup> Making recycling work for people in flats and Making recycling work for people in flats 2.0 - ReLondon

<sup>19</sup> LB Tower Hamlets - Reuse, Recycling and Waste SPD

<sup>&</sup>lt;sup>20</sup> Housing, England and Wales: Census 2021 - ONS

<sup>&</sup>lt;sup>21</sup>To note, these figures report a higher 2021/22 recycling rate for LB Camden (31% rather than 28.1%) because this is household collected waste streams, not including other waste sources such as RRCs, bulky waste, etc. which impact the figure reported by Defra.

London boroughs). These figures also show the contribution of food waste and garden waste to recycling rates across the boroughs.

#### Socioeconomics and demographics

Age, demographics, housing tenure and housing density all influence how likely an individual is to recycle. LB Camden has a relatively high % of households which are deprived in 3 or 4 dimensions, and low % of household ownership; both of which are negatively correlated with household recycling rate. Altering behaviour can be challenging when it is necessary to target a transient and diverse set of individuals and communities, embedded within complex waste management arrangements. ReLondon can support LB Camden to deliver targeted communications and behaviour change activities designed to target these challenges.

## Recycling rates: key insights

- LB Camden's current waste arisings (297.8kg per person) rank sixth out of nine when compared with benchmarked boroughs. However, more widely, LB Camden ranks seventh across 33 London boroughs, and tenth nationally.
- LB Camden's current recycling rate (28.1%) ranks seventh out of nine when compared with the benchmarked boroughs. However, despite a significant decrease between 2018/19 and 2019/20, LB Camden has seen an increase of 1.8% over the last 8 years. In the same time, the NLWA recycling rate and London recycling rate have decreased. This increase also performs well when compared with LB Camden's nearest neighbours.
- The factors which influence recycling rates for urban authorities are discussed above. In summary;
  - Recycling rates are lower in boroughs with a higher proportion of flats. LB Camden has the highest proportion of flats (87% according to census data) across all benchmarked boroughs.
  - Lack of (heavy) garden waste in communal waste streams means that recycling rates for dense urban environments are unlikely to ever reach kerbside levels. This means that increasing LB Camden's recycling rate requires focus on increasing the capture of other materials (DMR and food).
  - LB Camden has a relatively high % of households which are deprived in 3 or 4 dimensions, and low % of household ownership; both of which are negatively correlated with household recycling rate.
- The Mayor's London Environment Strategy ('LES') (see 2.2.4) sets a target for 65% recycling rate for municipal waste by 2030. This includes targets for 50% recycling rate for household waste and 75% for business waste. LB Camden's recycling rate is currently 28.1% and LB Camden should therefore consider its trajectory towards these targets as part of the contract review process and any strategic decisions.

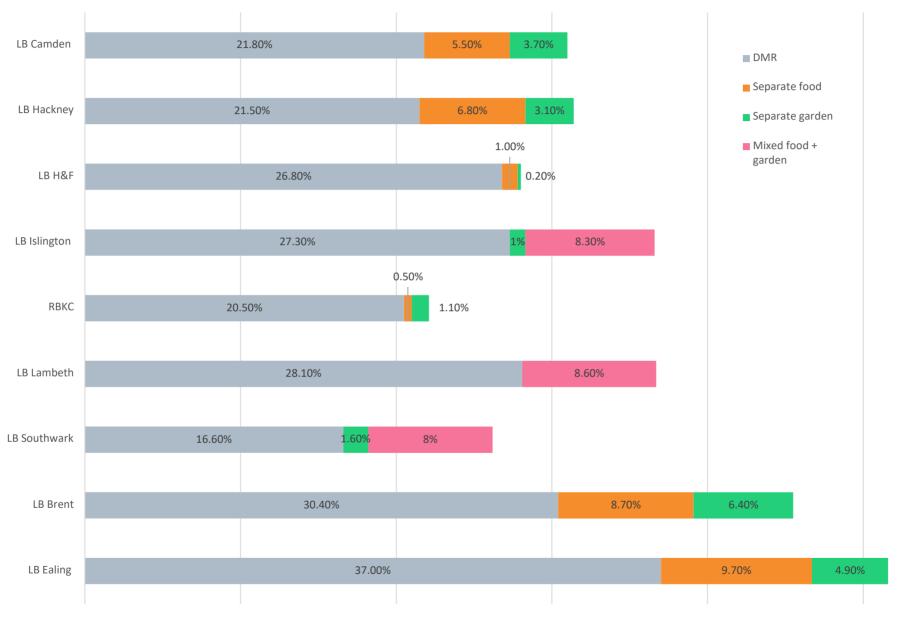


Figure 12 Breakdown of recycling rates across benchmarked boroughs (Source: WasteDataFlow 2021/22 Financial Year)

# 2. Impact assessment

LB Camden's proposed contract extension period with Veolia coincides with the implementation of several significant developments in national and regional waste policy. ReLondon have summarised these policies below and assessed the impact for LB Camden's services during the proposed contract extension timeframe (2025-2033) using a RAG rating.

## 21. National

In 2018, the Resources and Waste Strategy<sup>22</sup> set out the Government's ambitions for higher recycling rates, increased resource efficiency and a more circular economy in England. This led to a number of consultations between 2019 and 2021 on key policy areas which are known collectively as the Collection and Packaging Reforms. The necessary powers to deliver these policies are included in the Environment Act 2021.

# Packaging Extended Producer Responsibility ('pEPR')

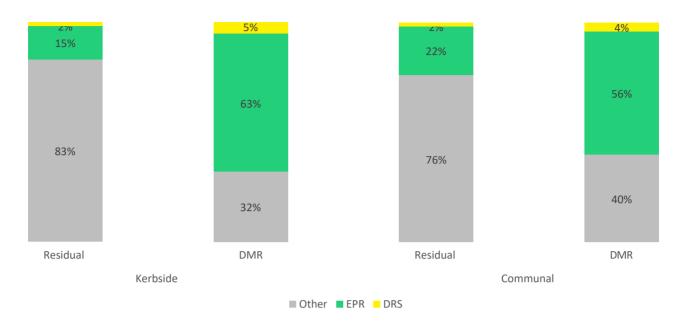
pEPR will require the producers of packaging to cover the full net cost of managing packaging waste, including collection, sorting and recycling/disposal, moving this cost away from taxpayers and local authorities. Producers will pay more for less sustainable packaging, incentivising packaging that uses less material and is more easily recycled. Defra expect obligated producer costs to be around £1.7 billion each year<sup>23</sup>. It is expected that producers will become liable to pay fees from 1<sup>st</sup> April 2024, and that the actual allocation of funds to LAs will commence later in that financial year.

The definition of packaging covers all products made from any materials which are used for the containment, handling, delivery and presentation of goods from the producer to the consumer, excluding those covered by DRS (see 2.1.2). For local authorities, the pEPR scheme will cover packaging in household waste streams and street litter bins but will not cover ground litter or commercial waste. (Defra will explore payments for commercially collected waste in the future.)

pEPR will be managed by the Scheme Administrator ('SA'); a public body to be established by the end of 2023. The SA will be required to distribute payments to local authorities for the full net costs of providing *efficient and effective* systems for managing household packaging waste. At present, it is not known how the SA will model these costs. It is expected that local authorities will be grouped based on local characteristics (e.g. geography, rurality, deprivation), and this assessment will also consider relevant national waste policy (i.e. consistent collections, see 2.1.3). Local authorities deemed to be underperforming will be subject to an improvement plan and may receive less pEPR funding. It is not known how these plans will be developed, managed or monitored. To ensure the SA has the data necessary to calculate payments, the SA will request local authorities to provide accurate and timely data.

<sup>&</sup>lt;sup>22</sup> Our Waste, Our Resources: A Strategy for England

<sup>23</sup> Extended Producer Responsibility - Consultation Response 26 March 2022



**Figure 13** Materials in scope of EPR and DRS in London's household waste streams (Source: ReLondon's waste composition analysis)

ReLondon have recently developed a waste composition analysis for London, compiling datasets from 22 boroughs. This data demonstrates the nature and scale of challenges for urban recycling<sup>24</sup>. Based on this, Figure 13 shows the % of materials in London's household waste streams which are in scope of pEPR and DRS. London authorities could expect 28% of their total household collected waste to be funded through EPR (full net recovery).

#### Impact for LB Camden:

LB Camden will receive payments under pEPR to cover the full net cost of collecting and managing packaging waste in household waste streams and street litter bins. LB Camden could expect 28% of the total household collected waste to be funded through EPR. These payments are yet to be modelled, but it is expected that local authorities will be grouped based on local characteristics and collection systems. LB Camden should ensure that it responds to any data requests from Defra/the SA in order to inform this modelling.

LB Camden should consider pEPR income and possible reporting obligations as part of the contract review and any strategic decisions as these will apply within the proposed contract extension timeframe. We expect some clarity around this following the establishment of the SA in late 2023.

<sup>&</sup>lt;sup>24</sup> ReLondon's waste composition analysis is currently being finalised and a briefing note will be available in the near future.

## Deposit Return Scheme ('DRS')

In a DRS, a deposit amount is added to the cost of a drinks container and is paid by the consumer. When the consumer has finished with the container, they take it back to a designated return point to redeem the deposit amount. This has the potential to incentivise the return of high quality, source separated materials for recycling, and reduce litter and the associated environmental impact and management costs. The start date for DRS in England is currently set for the 1<sup>st</sup> October 2025.

In England, the DRS will cover all 50ml < 3L drinks containers which are PET plastic or steel/aluminium cans. A Deposit Management Organisation ('DMO') will be appointed by summer 2024 and will be responsible for managing the overall operation of the DRS and meeting the ambitious collections targets set out in regulations; 70% in year one, rising to 90% in year three. Local authorities can expect to see a reduction in the number of DRS containers in their collected waste streams. Figure 11 shows % in scope of DRS which could be lost is relatively small (<5%).

In the Government's response to the 2021 consultation on DRS, they confirmed that local authorities will be able to separate out in-scope drinks containers remaining in their waste streams and return these containers into the scheme, providing they meet the quality required, to receive the deposit amount. At present, it is unknown how this separation and payment mechanism will work in practice, and the implications this will have for local authority collections and sorting infrastructure.

#### Impact for LB Camden:

In London, drinks containers in scope of DRS make up <5% of household waste streams. LB Camden can expect to lose this material as residents take these containers back to deposit return points instead. However, the Government have confirmed that there will be the opportunity for local authorities to separate DRS containers found in their waste streams in order to claim the deposit amount. It is currently unknown how this separation and payment mechanism will work in practice.

The DRS will commence within LB Camden's proposed contract extension period; LB Camden should consider the implications of DRS as part of the contract review and any strategic decisions. In particular, the loss of DRS containers in collected waste streams and the potential opportunity to reclaim those remaining in order to claim the deposit amount. LB Camden should work closely with the NLWA to understand the collection and disposal implications of DRS. We expect some clarity around this following the appointment of the DMO in 2024.

# Consistency in household and business recycling in England ('consistency')

\* Please note, since the below section was written, the Government replaced the Consistency proposals with the new <u>Simpler Recycling</u> proposals in October 2023. The separate collection of recyclables and a free garden waste service, as referred to below, will no longer requirements under the new proposals.

We are imminently awaiting the Government's response to the 2021 consultation on consistency which should provide some clarity on issues discussed below. This response will be published at the same time as a consultation on Statutory Guidance, which is expected to seek local authorities' views on collection frequencies and containerisation.

The Government has proposed requirements for greater consistency in the materials collected for recycling from households and businesses across the country. This is hoped to reduce public confusion, increase capture rates and maximise recycling performance.

Under these requirements, it is understood that every local authority will need to arrange for the following services from <u>all households</u>, businesses and non-domestic premises such as hospitals and schools:

Requirement	Do LB Camden currently fulfil this?
Separate collections for a core set of dry recyclable materials: glass, metal, plastic, paper and card *	LB Camden collects all of these materials, however in a comingled dry recycling stream.
Collections for additional materials: foil, metal packaging, cartons (the deadline for these materials is unspecified)	LB Camden collects all of these materials, however in a comingled dry recycling stream.
and plastic film (by April 2027)	LB Camden/NLWA do not accept plastic film in household recycling streams.
Separate, weekly food waste collections for recycling or composting (by March 2025)	LB Camden offer separately weekly food waste collections to 100% kerbside properties, 50% flats and 0% FLASH.
Separate, free garden waste collections for recycling or composting (it is unclear if this measure will be included in the Government's final proposals) *	LB Camden offer a chargeable garden waste collection service.

According to the Environment Act, recyclable household waste in two or more recyclable waste streams may be collected together (comingled) where it is not 'technically or economically practicable' to collect separately, or 'has no significant environmental benefit'. This is referred to as the 'TEEP test'. This is particularly relevant to urban authorities where housing stock and accessibility are most likely to pose practicability problems. It is currently unknown how assessment will be reviewed.

As for food waste; it was announced in the 2021 budget that the Government have allocated £300 million towards 'new burdens' funding for local authorities to introduce separate food waste collections. However, it is unknown which elements of capital costs this will cover beyond vehicles and containers, for example housing units. It is also unknown whether there will be any support for the ongoing costs of running a food waste service, for example, liners, communications, and staffing costs. Further, with local authorities across the country needing to meet this requirement by 2025, this will have significant implications for the supply chain and could mean long lead times for vehicles, containers, etc.

ReLondon's waste composition analysis for London can be used to model the potential impact of the consistency agenda on LB Camden's recycling rate. Based on this data, Figure 14 shows the maximum recycling potential under the requirements of consistency, assuming 100% capture rates\* and all properties being offered the services. Based on this modelling, under maximum separation, LB Camden would see around a 70% recycling rate. (As discussed in 1.3, LB Camden's 2021/22 recycling rate is 28.1%.)

\* NB. 100% capture is not a realistic scenario; this has been used to demonstrate the diversion potential in waste streams and give an indication of what is in the realms of the possible.

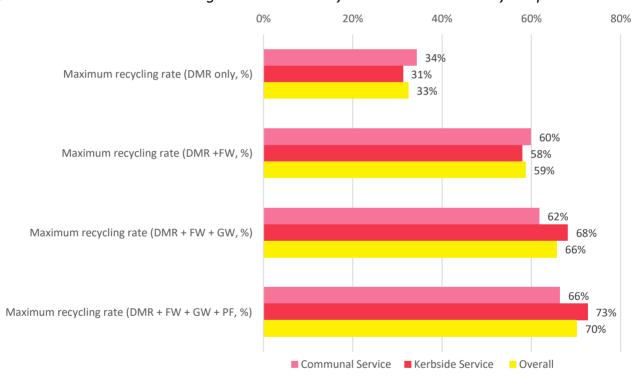


Figure 14 Maximum recycling potential (Source: ReLondon's waste composition analysis)

It is clear to see the significant contribution that separate food waste collections ('FW') have on increasing recycling rates. However, it is worth considering that approximately two thirds of food waste collected across London is <u>edible</u>. Therefore, successes in food waste reduction could limit recycling rates. However, eliminating food waste brings greater benefits in terms of carbon emissions abated than sending it to energy from waste (including anaerobic digestion) - therefore reducing edible food waste, rather than just moving it from one bin (residual) to another (dedicated separate food waste), should be a priority for urban centres where collection is more challenging.

It is also worth noting that the separate collection of plastic film ('PF') accounts for 5% a increase in overall recycling rate. LB Camden should work closely with the NLWA to understand the collection and disposal requirements for additional materials such as plastic film.

## Impact for LB Camden:

Part 2 of LB Camden's 2023/25 RRP evidenced consideration for these requirements. In particular, food waste collections to flats above shops. The provision of this service will need to be incorporated into the contract review process and any strategic decisions. LB Camden could receive new burdens funding to deliver this.

It is anticipated that the requirement for a free garden waste service will be removed from the consistency proposals in the Government's response to the 2021 consultation. If not, LB Camden will need to consider the financial and operational implications of offering a free service as part of the contract review process and any strategic decisions.\*

LB Camden should work closely with the NLWA to understand the collection and disposal requirements for additional materials such as plastic film.

## 22 Regional

## 2.2.4. The London Environment Strategy ('LES')

The LES<sup>25</sup> was published by the Mayor of London in May 2018 and sets out ambitious aims across a range of environmental issues. Chapter 7 focuses on waste. London boroughs are required to act in *general conformity* with the Mayor's municipal waste management policies and proposals. This is demonstrated through the development of Reduction and Recycling Plans<sup>26</sup> ('RRP's) which are agreed with the Mayor and reviewed every 4 years. Boroughs have recently submitted RRPs for a shorter 2 year period from 2023-25 in anticipation of national legislative changes (see 2.1). In RRPs, boroughs must evidence targets which make a meaningful contribution towards meeting the Mayor's targets;

- Deliver the Mayor's minimum level of service (6 main dry recycling materials and food waste collections from all properties, including flats where practical and cost effective.)
- By 2026, no biodegradable or recyclable waste sent to landfill.
- By 2030, 65% recycling rate for municipal waste (by weight). (This includes targets for 50% recycling rate for household waste and 75% for business waste.)
- By 2030, reduce food waste per person by 50%.

<sup>&</sup>lt;sup>25</sup> London Environment Strategy

<sup>&</sup>lt;sup>26</sup> Reduction and Recycling Plans

Boroughs must also act in general conformity when undertaking any waste contract procurement and/or waste strategy development.

### Impact for LB Camden:

LB Camden meets the requirements for the Mayor's minimum level of service; all kerbside and flatted properties are offered collections for the 6 main DMR materials and food waste.

LB Camden's 2023/25 RRP actions evidence a strong commitment to waste reduction and maximising recycling in order to increase the borough's recycling rate. LB Camden also have one of the lowest figures for waste arisings across the country (see 1.3.6). LB Camden have included a target for 35% household recycling rate by 2024/25 (2021/22 recycling rate is 28.1%). There is a risk this trajectory may not reach 50% by 2030. This target should be considered and reconciled as part of the contract review as it applies within the proposed contract extension timeframe.

LB Camden should continue to focus on waste reduction activities around food waste in order to contribute towards the reduction of food waste per person by 50% by 2030.

LB Camden should refer to the GLA's guidance on waste contract procurement and waste strategies review part of the contract review process and any strategic decisions.

## North London Waste Prevention Plan 2022-2025

'Preserving Resources, Driving Change'<sup>27</sup> sets out sets out the NLWA's short-term strategic approach to reduce residual waste across the seven North London boroughs, from Autumn 2022 to mid-2025. This plan was developed in collaboration with residents, sector specialists, borough staff, councillors and campaigners, and will inform the development of the next Joint Waste Strategy (see 2.2.6). The plan is designed to support, enhance, and amplify the work of the constituent boroughs, with a focus on greater collaboration with, and financial support of, community groups dedicated to the cause of waste reduction. Key aspects include:

- An increase in grant funding to community groups via NLWA's North London Community Fund<sup>28</sup>.
- A review of the network of household RRCs with the ambition to transform them into hubs for circularity.
- The opening of a new education centre at Edmonton EcoPark for schools, local interest groups, residents, talks, and events.
- Revival of repair shops and supporting residents to learn repair skills.
- Working on ways to recycle difficult-to-recycle items, such as carpets.
- Supporting trials in boroughs including food waste recycling services for residents living in flats above shops.

<sup>&</sup>lt;sup>27</sup> Preserving Resources, Driving Change - North London Waste Prevention Plan 2022-25

<sup>28</sup> NLWA North London Community Fund

 Funding more in-person activities and high-profile advertising campaigns to drive behaviour change with extra support for boroughs.

### Impact for LB Camden:

The NLWA WPP should support, enhance and amplify LB Camden's own work around waste prevention, engaging residents and creating opportunities for Camden-based community groups and businesses to access funding in support of circular initiatives.

The plan's lifetime ends in 2025 so does not overlap with LB Camden's proposed contract extension period. However, the WPP will provide precedent for the NLWA's waste prevention activities moving forwards and inform the development of the new Joint Waste Strategy (see 2.2.6).

## 2.2.6. North London Joint Waste Strategy 2024-2040

The previous North London Joint Waste Strategy expired in 2020. At that time, the Government had recently consulted on national legislative changes which would affect the operation and funding of waste management (see 2.1). Members intended to wait until there were clear plans on these issues in order to develop the next long-term strategy. However, at risk of excessive delay, the development of a new strategy has started, proposed to cover the period 2024 to 2040. A key element of the new strategy will need to address the emerging changes to the national policy landscape and the impacts for both the NLWA and it's constituent boroughs.

The strategy will set out a strategic approach and targets for reducing, reusing and recovering a greater proportion of the municipal waste generated in the North London area, with a focus on activities to move all waste up the waste hierarchy. For waste that cannot be recovered or reused, this will be incinerated at the new North London Heat and Power Plant at the Edmonton EcoPark which should become fully operational during the strategy period.

The NLWA have commissioned Frith Resource Management as consultants to support the development of the JWS. Plans for initial public engagement will be discussed with representatives from the constituent boroughs and other key stakeholders at a workshop on 31<sup>st</sup> May 2023.

#### Impact for LB Camden:

The new North London JWS will outline a consolidated approach to waste reduction, reuse and recovery across the seven North London boroughs. This should support LB Camden's own activities and progress towards recycling targets.

It is currently unknown how the JWS will incorporate emerging changes to national policy (see 2.1) and how this will impact the NLWA's disposal operations and outreach activities. LB Camden should stay informed with the development of the JWS as it progresses in order to ensure strategic alignment and understand any impacts for its disposal contract.

## **Prepared for:**

The London Borough of Camden

## **Prepared by:**

Freya Rose

**Cathy Cook** 

**Anthony Buchan** 





## relondon.gov.uk

The White Collar Factory, I Old Street Yard, Old Street, London ECIY 8AF

ReLondon is the operating name of the London Waste and Recycling Board.