



Greater Manchester Combined Authority

5 YEP Partnership

Date: 10 October 2025

Subject: Greater Manchester Interim Waste Plan

Report of: David Taylor, Executive Director of Waste and Resources, GMCA

Purpose of Report

The report provides the Board with an overview of English waste policy and the proposed Greater Manchester Interim Waste Plan that sets out actions to be taken to enable GMCA to develop a long-term waste strategy in the future.

Recommendations:

The 5 Year Environment Plan Partnership is requested to:

Consider and comment on the report and draft Greater Manchester Interim Waste Plan and note the recommendations which will be considered by the GMCA at its meeting on the 30 January 2026 as below:

1. Note the contents of the report; and
2. Approve the Greater Manchester Interim Waste Plan.

Contact Officers

David Taylor, david.taylor@greatermanchester-ca.gov.uk

Equalities Impact, Carbon and Sustainability Assessment:

Recommendation - Key points for decision-makers

Insert text

Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation
Equality and Inclusion		
Health		
Resilience and Adaptation		
Housing		
Economy		
Mobility and Connectivity		
Carbon, Nature and Environment	G	
Consumption and Production	G	
Contribution to achieving the GM Carbon Neutral 2038 target	The resultant waste strategy adopted later in 2025 will set a route map for the sustainable management of household waste for nine of the ten GM districts. For example, it will detail how plastics recovery will be further increased to remove them from residual waste (subject to markets) and assess methods to prevent the emission of CO2 to atmosphere.	
Further Assessment(s):	N/A	
G Positive impacts overall, whether long or short term.	A Mix of positive and negative impacts. Trade-offs to consider.	R Mostly negative, with at least one positive aspect. Trade-offs to consider.
		RR Negative impacts overall.

Risk Management

Compliance with English waste policy will be a key part of increasing recycling rates, changing resident behaviour and managing waste more sustainably. Failure to do so may increase exposure to environmental charges and increased costs. Adoption of the Interim Waste Plan will mitigate against this.

Legal Considerations

There are no legal considerations within this report.

Financial Consequences – Revenue

Compliance with English waste policy has been factored into the Waste and Resources medium term financial plan. The principal financial risk to revenue will be from the Emissions Trading Scheme which comes into effect in 2028 but Government has yet to release details of how the scheme will operate so an assessment of impact cannot be made at this time.

Financial Consequences – Capital

Capital requirement have been factored into the Waste and Resources medium term financial plan.

Number of attachments to the report:

Background Papers

- Resources and waste strategy for England as published December 2018 [Resources and waste strategy for England - GOV.UK](#)
- Simper Recycling: [Simpler Recycling in England: policy update - GOV.UK](#)
- Extended producer Responsibility for Packaging: [Extended producer responsibility for packaging - GOV.UK](#)
- Deposit Return Scheme: [Introducing the deposit return scheme for drinks containers – Environment](#)
- The expansion of the Emissions trading Scheme to include waste: [UK Emissions Trading Scheme scope expansion: waste - GOV.UK](#)
- Defra's 25 Year Environment Plan target: [At a glance: summary of targets in our 25 year environment plan - GOV.UK](#)

Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

Yes

Exemption from call in

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

N/A

GM Transport Committee

N/A

Overview and Scrutiny Committee

29 October 2025

1. Introduction/Background

The previous Government published the English Resources and Waste Strategy (RaWS) in December 2018. Between then and now there have been a number of related consultations resulting in fixed positions on a range of waste-related subjects. There are a number of key policy elements that make up the RaWS that are currently being implemented or will be in the future. In addition, Government has also been consulting on other policy initiatives that are focused on carbon reduction that impact upon waste management activities.

The principal policy areas, timeline for implementation and targets are:

- Extended Producer Responsibility for Packaging (pEPR) with effect from 25/26;
- Simpler Recycling requirements take effect from 2026 and mandatory collection of plastic films/'soft' plastics from 2027;
- Deposit Return Scheme (DRS) from 2027;
- Energy from Waste (EfW) carbon emissions included in the Emissions Trading Scheme (ETS) from 2028; and
- 65% recycling of municipal waste from 2035.

This report sets out the implications of these policy initiatives for GMCA's waste management arrangements and the actions that will be taken to develop a future waste management strategy to deliver the 2035 target.

2. Implications of Waste Policy for GMCA

2.1. Extended Producer Responsibility for Packaging

Extended Producer Responsibility for Packaging (pEPR) came into effect fully in the 25/26 financial year. Under this scheme any organisation that is placing in-scope packaging materials on the market is liable to pay a fee based on the type and quantity of packaging it places on the market. The subsequent fees are paid to the scheme administrator, Pack UK, and are then redistributed annually to local authorities that are involved in the collecting, handling, sorting, transport, recycling and disposal of packaging materials. These payments are intended to push the costs of managing packaging materials back to the producers in line with the polluter pays principle and to enable more efficient and effective collecting and sorting systems.

Packaging producers can reduce the fee they are liable for by reducing the amount of packaging they place on the market and/or by switching to more sustainable types of packaging. Over time, pEPR is anticipated to reduce the amount of unnecessary packaging, increase the recyclability of packaging and reduce the range of different plastic polymers that are used.

For GMCA and districts, pEPR is providing financial support for collection and handling of packaging materials and should, over time, increase the recyclability of packaging materials. This will change the quantity and composition of kerbside collected recyclables but it is too early to be able to quantify what the changes will be and how that may impact upon collection services or waste processing infrastructure requirements.

Payments to local authorities under pEPR will also be subject to an assessment of efficiency and effectiveness from 2027. If an authority's collection arrangements are deemed to be neither efficient nor effective by the scheme administrator then the annual payment can be reduced by up to 20%. As yet, the methodology and guidance on the assessment of efficiency and effectiveness has not been issued so the future implications cannot be assessed.

2.2. Simpler Recycling

Simpler Recycling aims to introduce consistent collection arrangements for household waste such that all local authorities are obligated to collect the same core materials. These are plastic, paper and card, glass, metals (cans, tins and foil), food waste and general waste from 2026.

During the consultation process the Government clarified that this did not require separate collection i.e. up to 7 bins and that materials can be co-collected, with a 4 bin collection system (as operated by the 9 districts in the GMCA waste arrangements) being seen as the default system for collection. GMCA and the districts will need to make the following changes to collection arrangements in order to fully comply with Simpler Recycling:

- Food cartons (tetrapak) will need to be collected with plastic items. This material is currently collected with paper and card.
- From 2027, plastic films and flexibles will need to be collected from every household.

In response to these requirements, GMCA is investing in a new Materials Recovery Facility (MRF) that will enable these additional materials to be included in mixed kerbside

collections of recyclables from households. This facility is due to be operational in 2027 at which point, GMCA will be fully compliant with Simpler Recycling.

2.3. Deposit Return Scheme

The Deposit Return Scheme (DRS) is due to be introduced in England, Wales and Northern Ireland in October 2027. This scheme will require consumers to pay a refundable deposit on in-scope single use drinks containers which they can get back by returning the empty containers to a reverse vending machine located in retail premises. The scheme aims to reduce littering and promote the use of recycled materials.

In scope containers are those made of plastic (the PET polymer only), steel and aluminium containers between 150ml and 3 litres in capacity. Similar schemes are in operation in Ireland and Europe with high participation rates. Defra estimate that 90% of in-scope materials will be collected in this way once the scheme has bedded in.

If the Defra modelling is correct, then DRS will affect the quantity and composition of recyclables collected by districts at the kerbside with a knock on effect for GMCA contract arrangements with Suez. Aluminium is the most valuable commodity collected for kerbside recycling and this could therefore reduce significantly in kerbside collections with loss of revenue and a potential reduction in kerbside recycling rates.

2.4. Emissions Trading Scheme

During 2024 Government ran a consultation exercise on the inclusion of energy from waste into the UK's Emissions Trading Scheme (UKETS) from 2028. The UKETS is a scheme whereby larger emitters of carbon dioxide (CO₂) effectively pay a levy on the quantity of fossil-based carbon (i.e. carbon from an oil source) they release into the atmosphere.

The ETS scheme is a cap and trade mechanism whereby the amount of carbon 'allowed' to be emitted by obligated sectors reduces each year. Each tonne of carbon emitted comes at a price (set by an international market) and emitters need to purchase enough allowances to cover their emissions and/or work to reduce their emissions so they need to buy fewer allowances.

For the GMCA this could mean having to purchase allowances to cover around 250,000 tonnes of CO₂ each year as around half of the CO₂ emitted from the thermal recovery of our waste comes from a fossil source. The price of each allocation will vary as this operates on an open market and the Government used a figure of £70/t for modelling work in 2023. Applying this to GMCA household waste the cost could be in the region of

£17.5m per annum, however this number will increase/decrease according to the carbon market price.

GMCA responded to the consultation and stated significant concerns over the potential financial impacts for local authorities. Local authorities are not in control of the quantity or composition of the waste they handle and are also not the producers of that waste. GMCA view is that the polluter pays principle should apply and the producers of high carbon content products should be covering the carbon costs. This would require Extended Producer Responsibility (EPR) to be rolled out for products other than packaging, for example textiles and absorbent hygiene products (AHPs), to ensure the carbon cost is not picked up by local authorities.

The Government has yet to issue the response on financial impacts but has issued statements to say that the financial impact on local authorities is recognised and work to understand this and develop solutions is underway. As a consequence, this response is unlikely to be released for at least 12 months.

While this delay is welcomed for the purposes of addressing local authority financial impacts it does leave uncertainty over how local authorities can mitigate against potential impacts. For example, do they invest in enhanced sorting infrastructure to remove more plastics and textiles from the waste stream to mitigate against future ETS costs when the sector does not yet know whether local authorities will ultimately be liable for ETS costs?

3. Greater Manchester Municipal Waste Strategy

3.1. The Current Strategy

Traditionally, waste strategies have tended to be long duration strategies covering 20 or 25 years. These often-mirrored long contract terms and it was felt there was enough certainty (either within a local contractual framework or national policy landscape) to be able to fix strategic objectives. However, what the development and implementation of the national Resources and Waste Strategy has shown is that some key proposals can and do take a long time to come to fruition. As a result, GMCA has delayed developing a strategy until such time as it was felt there was some certainty when it came to policy initiatives in the RaWS, particularly, Simpler Recycling and the pEPR. As set out in section 2, it will be several years before the impact of pEPR, DRS and ETS on waste quantity, composition, collection services and disposal infrastructure requirements are fully known and understood.

In 2011 the Greater Manchester Waste Management Strategy was published and was designed to cover an extended period to 2025. It set aims, objectives and targets for reducing waste and increasing recycling and informed subsequent procurements and infrastructure developments. The strategy went through full consultation with residents of GM and stakeholders as it was a statutory document (no longer the case). The principles of the Strategy remain as is today, follow the waste hierarchy principles, reduce waste and maximise quality and quantity of recyclables and deliver research and innovation which was key to developing the infrastructure/technology which led to the four-bin collection system.

3.2. The Interim Waste Plan

Whilst enough certainty has emerged in the key areas of Simpler Recycling and EPR payments, uncertainties remain over the impact of DRS, ETS and changes in waste composition and quantity. Therefore, it is not proposed to draft a long-term strategy but an Interim Plan that covers the period 2026 to 2030. There are a number of reasons for this:

- it aligns with the GMCA's Five Year Environment Plan cycle;
- it gives time for the DRS to develop, be introduced and bed in;
- for the treatment of Biowaste we were seeking to procure facilities to treat our tonnages from around 2029 but the current Green Gas Support Scheme (a key financial incentive for various technologies) comes to an end in 2028 and no successor scheme has been announced; and
- there is continued lack of clarity over the introduction of the ETS for the thermal recovery of waste due to commence at the start of 2028 and we need to see how this and any alternative options develop.

A long-term waste strategy may be the culmination of a long process of:

- service review (both at the collection and disposal levels);
- options appraisals assessing different methods of collection, treatment, recycling, recovery and disposal;
- the undertaking of strategic environmental assessments; and
- extensive public consultations.

These are not proposed as GMCA's model of waste treatment, recycling, recovery and disposal mirrors the Government's announced 'default' method of household waste collection - a four-stream system that is used already in Greater Manchester.

Therefore, no change to this core methodology is proposed and the Government is clear on what materials we are expected to collect so the need for extensive and costly support work to devise a long-term strategy is not necessary. Instead, an interim plan is required that sets out the monitoring requirements, assessments and actions that are required to generate the data and understanding of policy implementation over the next 5 years so that a longer term strategy can be developed in the future.

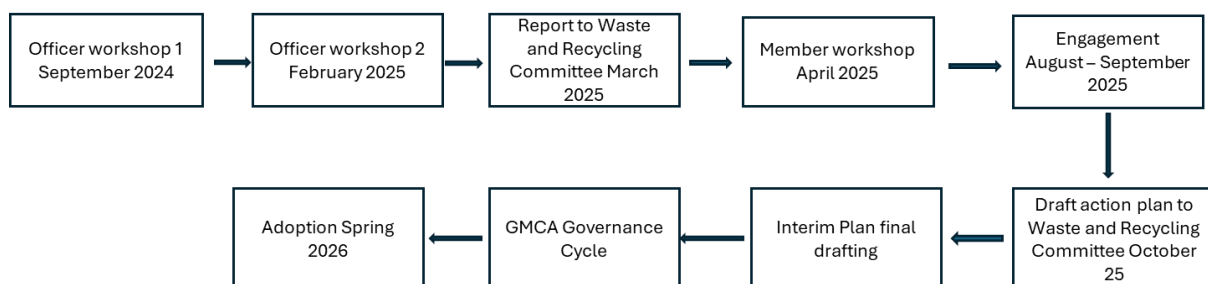
The Interim Waste Plan will contain:

- a summary of the services and infrastructure provided by GMCA and its partners;
- a backward look at how GMCA has performed compared to its previous strategy and any wider targets and obligations. It will paint a picture of the progress we have made to achieving a kerbside recycling performance of 50%, a HWRC recycling performance exceeding 60% and a level of landfill diversion that is in excess of 99.5%;
- a summary of external strategies, policies, legislation and schemes that are informing the development of the GM household waste management strategy;
- the future challenges (such as textiles) and how they might be addressed in the Interim Plan period;
- how the Interim Waste Plan will support the delivery of priorities and objectives set out in the Greater Manchester Strategy; and
- a detailed action plan and timeframe for delivery.

4. The Interim Plan's Development Process and Timescales

GMCA and district officers met in the autumn of 2024 to start the thought process for the strategy. From this, key challenges and issues were identified – these have been incorporated into the thinking for the strategy.

A simplified timeline of actions is:



5. The Interim Plan's Strategic Objectives

The waste officer and Member workshops held in February and April 25 respectively identified several strategic objectives to be delivered through the GM Interim Waste Plan by GMCA working collaboratively with partners, government, manufacturers, retailers, businesses, residents and NGOs. These strategic objectives are to:

- Develop and deliver innovative and inclusive services that reflect local challenges such as population growth, demographic changes and housing stock;
- Decarbonise household waste, services and infrastructure;
- Use our services and the waste collected to deliver social, environmental and economic value; and
- Ensure Greater Manchester's voice continues to be heard and to influence the development of waste policy.

Since the July 25 meeting of the Waste and Recycling Committee, a plan on a page has been developed that sets out the high-level actions that we will take to deliver these 4 strategic objectives. This plan on a page is set out at Appendix A and members are invited to provide feedback on the proposed actions.

A more detailed delivery plan is set out at Appendix B which sets out the specific actions for delivery against the 4 strategic objectives. Appendix C provides a timeline for delivery across the 4-year term of the Interim Waste Plan. Members are invited to provide feedback on the draft detailed delivery plan and timeline. These actions will be monitored, measured, reported and refreshed over the life of the Interim Waste Plan.

6. Engagement

In order to inform the development of the Interim Waste Plan public engagement has been undertaken over the summer using the Big Recycling Survey to gain insights into residents' attitudes to recycling and perceived barriers.

The survey included questions to establish which items are currently being recycled at home, those that are being missed, those that are causing contamination as well as asking people what motivates them to recycle and what their barriers are. Specific questions were included to understand how residents interact with key waste services like household waste recycling centres, textile banks and takeback schemes in retailers.

Responses were received from 7,825 residents to the Big Recycling Survey. Initial results show that 92% of respondents 'always recycle at home'. This suggests there's a real willingness from residents to engage with the recycling process, with many demonstrating high levels of confidence in managing their own household waste. Around 85% of respondents were motivated to recycle because of concerns about the environment, with 55% doing it out of a sense of civic pride.

Almost 1,400 residents have provided detailed information about challenges they face when recycling. Over a quarter of residents reported that they weren't always sure which items went in each bin and that their bins get too full too quickly.

Following completion of the survey, the second phase of engagement will identify gaps in those who responded to the survey to ensure the resulting data is statistically representative of the Greater Manchester population and demographics. This will involve telephone and face to face interviews targeted to those groups who are less motivated to recycle. The survey and follow up interviews will then be analysed and a report produced which will be provided to members of the Waste and Recycling Committee once they are available

As well as providing useful data for the Interim Waste Plan, the survey results will help to shape future Recycle for Greater Manchester campaigns. Each council will receive a breakdown of their own results to help shape their own services. We intend to run the survey biannually to establish changes and trends in resident behaviour.

7. Process to Conclude

Feedback from members received at the meeting will be incorporated into the draft documents as well as feedback from the focus groups. The remaining sections of the Interim Waste Plan are being compiled, and the intention is to seek approval for the Plan at the January 26 GMCA meeting. Working drafts of the document will be shared with members of the Waste and Recycling Committee in advance of this.