

Dr Therese Coffey MP
Parliamentary Under Secretary of State
Department for Environment, Food
& Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

Date: 22nd August 2017
Our ref: LC/RD

Dear Dr Coffey,

Recycling Rates

I refer to your letter dated 27th July 2017 sent to the Leader of Sunderland City Council, Councillor Paul Watson with regard to 2015/16 Household Recycling rates. I am responding on his behalf.

Firstly, may I say, it is pleasing to read that one of your main priorities as Parliamentary Under Secretary of State is to increase household recycling.

Across the waste sector, many consider that there could be clearer direction from Government regarding national policy on waste reduction and improving recycling rates. The 25-year environment plan is, therefore, welcomed in supporting local authorities to prioritise waste-related resources at a time when the delivery of essential services in Sunderland remains a challenge due to the continued decline in funding.

In 2015/16, Sunderland City Council collected residual waste weekly, recycling on a fortnightly basis and a chargeable garden waste collection service also fortnightly in season. Weekly collections of residual waste had been maintained as a result of a successful bid in 2012 to the DCLG weekly collections support scheme. Following the expiry of the DCLG grant, we moved to the alternate weekly collections of recycling and residual waste in April this year. Our comparatively low recycling rate last year is at least in part due to our previous weekly residual waste collections. Evidence from other Local Authorities in our region suggests which operate the same or similar recycling systems that this change should have a significant positive impact on the household recycling rate in 2017/18.

The City Council remains committed to increasing recycling rates and have therefore continued to deliver engagement and incentives programmes with our residents. For 2017/18 we have engaged a third sector partner with a national reputation for working effectively with communities on environmental issues, Groundwork, to deliver a 12-month programme of waste communications and incentives. This includes targeted face-to-face conversations with residents who struggle to or do not recycle, educational visits to schools, and related activities to encourage greater participation and resident competence in sustainable waste management practices.

We are also reviewing our provision of Civic Amenity sites (which we term Household Waste Recycling Centres) in the City with the view to making funding available in our budget process for 2017/18 to improve capacity and recycling performance. Issues in respect of performance of these sites which require intervention at national level are:

- There are limited outlets for the recycling of wood waste, compounded by wood-based product contaminants (e.g. MDF, laminates, and specialist wood products) not being segregated to a sufficient degree to prevent contamination of suitable clean wood. Much wood is now being used as biomass feedstocks for the production of energy.
- Market price volatility and availability for materials such as hard plastics and mattresses remains a key issue.
- The lack of Waste Electrical & Electronic Equipment (WEEE) facilities in the UK has an impact of the cost of collecting and responsibly disposing of electrical goods.

The Council awarded a contract for the management of its Household Waste and Recycling Centre in 2014 which was an incentive based contract whereby the contractor receives a payment based on recycling performance above a pre-agreed target. This has helped to increase recycling rates on this service.

In terms of our waste strategy and main contracts Sunderland City Council is one of three unitary councils (along with Gateshead and South Tyneside) that make up the South Tyne and Wear Waste Management Partnership (STWWMP). The partnership was established in 2008 to initially develop a waste treatment solution to reduce reliance on landfill for waste generated by 624,480 residents, whilst tackling the growing environmental and financial issues they would face in future.

A joint partnership team was created to deliver Waste Disposal Authority functions on the partner authorities' behalf, which, by 2015, included day-to-day contract management roles for a range of waste and recycling contracts; enabled back office functions (such as data reporting) to be harmonised; joint communication exercises to be developed, and joint procurement exercises to be delivered across the partnership. The team has also supported initial research into potential opportunities to deliver other joint working arrangements, and supported initial discussions with local councils outside of the partnership to identify potential opportunities to participate in future procurement exercises/contracts.

All three partner councils have also developed close and effective working relationships with external contractors, with joint contract management arrangements ensuring that services are fit-for-purpose and meet the operational requirements of each council.

Operationally, partner authorities provide mutual support/collaboration in a number of areas, for example, borrowing bins/caddies from each other if orders to suppliers are delayed, sharing 'spare' collection vehicles to cover unexpected breakdowns, and providing technical support/presentations to collection crews.

With regard to the status of Sunderland City Council waste contracts within the Partnership:

- All collections services are delivered in house. The commissioning of waste collection services is being reviewed this year.
- Material Recovery Facility (processing of dry mixed recyclables) – external contractor (J & B Recycling) awarded in 2014. 3 year contract with an option to extend for a further 36 month period.
- Residual Waste Treatment – external contractor (South Tyne and Wear Energy Recovery Ltd). Service commencement date 2014. This is a 25- year PFI contract (SUEZ).
- Household Waste and Recycling Centre Management – external contractor (SUEZ) awarded in 2014. 3 year extension agreed in 2017.
- Green Waste Composting (processing of garden waste) - external contractor (Remondis) awarded in September 2016. 31 month contract with an option to extend for up to 36 months.

As part of the Residual Waste Treatment Contract, a partnership Visitor and Education Centre was constructed and a full time education officer promotes the principles of the waste hierarchy to local schools and community groups of all ages throughout the three council areas.

I would be delighted to host you at the Visitor and Education Centre if you would like to visit and see our partnership this great facility as we are really proud of the work our young people have undertaken at this site.

This contract also processes all residual waste collected through an Energy-from-Waste (EfW) facility which exports electricity to the national grid. In 2016/17, no residual waste from Sunderland City Council was sent directly to landfill.

However, Sunderland City Council would like to highlight the issue of the classification of recycled Incinerator Bottom Ash (IBA). Many UK local authorities make a valuable contribution to diversion of waste from landfill and generation of power by using EfWs to deal with residual or black bag waste. EfWs also produce a by-product, IBA, which is in itself recyclable: metals are extracted and sent for reprocessing, and the remaining material is used as a building aggregate in construction and road maintenance and reduces the need for local quarrying. The IBA output of incinerators is currently not recognised in England as a recycled material. This artificially depresses Sunderland City Council's recycling rate and, due to its inclusion in the calculation of recycling performance in Wales and other EU member states, creates an unfair comparison of recycling performance. Through STWWMP, the City Council is aware that DEFRA have held discussions with Hampshire's Project Integra on this matter, and any update regarding further progress on this issue would be gratefully received.

In summary, the City Council, through the STWWMP's Joint Municipal Waste Management Strategy (which is currently undergoing its second five-year review), is committed to improving its household recycling rates as far as reasonably practicable. It is anticipated that the recycling rate for 2017/18 will be improved mainly due to the implementation of fortnightly residual waste collections and the behaviour change programme we have mentioned. It is our firm belief that we would meet and likely exceed the 50% target through the combination of increased participation in recycling and the classification of IBA as recyclate. It is important to highlight that the cost of introducing new or more intensive collection and treatment systems to improve recycling rates is not practicable in the current and foreseeable financial circumstances and that IBA reclassification comes at no increase in cost.

I hope we have demonstrated that Sunderland City Council is committed to increasing recycling as much as we practically can within the financial constraints in which we operate. Your continued support is welcomed to help us make our contribution to national targets.

If you would like to discuss this in more detail, please do not hesitate to contact me.

Yours sincerely

[Redacted signature block]

[Redacted line]

Direct Line: [Redacted]

Email: [Redacted]