

Together, we stand for
a world beyond waste

The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the resource and waste management sector with a purpose to move the world beyond waste. Representing over 6,500 individuals in the UK, Ireland and overseas, CIWM has a mission to unite, equip and mobilise its professional community to lead, influence and deliver the science, strategies, businesses and policies for the sustainable management of resources and waste. CIWM has ten regional centres across the UK and Ireland, including CIWM Cymru Wales, that are run by member volunteers.

CIWM Cymru Wales organise an extensive programme of technical meetings, site visits, symposia and social events. Representing over 350 waste professionals working in local and national governments, agencies, private waste companies, consultancies, social enterprises as well as education and research centres, CIWM Cymru Wales provides a forum for professional debate and the opportunity for members to meet and socialise through a strong network of professionals.

Inquiry: Progress towards delivery of the Welsh Government's circular economy strategy, Beyond recycling (March 2021)

Please see our response to the committees' questions:

The Committee is particularly interested to know how the delays to the introduction of a Deposit Return Scheme and Extended Producer Responsibility Reforms will impact Wales recycling goals.

DRS

Since the DRS reforms won't be in place by 2025, the immediate impact to Wales' goals is seen to be negligible. However, their implementation, even if delayed, is essential for long-term sustainability and efficiency.

At present, only 2-3% of the potential recyclables are affected, but every bit helps. Wales is already achieving high recycling rates, but to reach the higher branches of our recycling goals, additional tools like DRS are necessary.

Wales has already achieved high dry recycling rates, demonstrating the effectiveness of the current system. This raises the question of whether there is a need for DRS however, despite high dry recycling rates, recyclables are still found in residual waste which need to



Together, we stand for
a world beyond waste

be retrieved. DRS can be another tool to incentivise that material to come away from the residual waste stream.

One advantage seen of DRS is that it provides a solution away from “on the go” waste, such as street bins. Additionally, DRS can help obtain high-quality feedstock from co-mingled and ongoing residual materials, ensuring that high quality recycled materials are recovered for recycling.

The delay in implementing DRS provides an opportunity to explore Digital DRS, which could offer significant long-term benefits, such as collection from the kerbside. This would make recycling more convenient and efficient, increasing participation rates further.

Digital DRS will also support better data capture and monitoring, helping us understand recycling behaviours and plan our future more effectively. While the delay has not impacted household recycling rates significantly, it is expected to support commercial recycling rates, which is a crucial area for improvement.

EPR

The delay in introducing the EPR reforms presents an opportunity to rethink how we can greater support the funding of local governments to support better collection methods and processing infrastructure.

Although the delay may mean that we will not see an increase of higher recyclable content packaging come to market sooner, the eventual implementation of these reforms will be highly beneficial in creating more opportunities for high quality captured recycling materials in the future.

A significant benefit of these reforms is making producers more responsible and invested in our recycling processes. When producers are accountable, they are more likely to design products with recyclability in mind and support effective recycling practices.

Economically, the reforms will benefit Wales to support our collection systems and processing capacity. This not only supports our recycling goals but creates jobs and positions Wales as a solution provider for the rest of the UK.

The financial resources generated from these reforms can also be further utilised to promote higher practices of the waste hierarchy, such as waste prevention, reuse, and recycling.

These reforms will ultimately enhance recycling practices, stimulate economic growth, and promote sustainability in Wales and beyond.



Roll out of the ban on single-use plastic products and business waste separation requirements.

Single Use Plastics

The banning of single-use plastics is a positive step towards reducing waste and environmental pollution. However, to achieve our broader recycling and sustainability goals, we must consider additional initiatives and strategies.

A key area for further effort is working closely with businesses, especially SMEs, to find innovative ways to reuse materials. Collaboration across sectors can lead to creative solutions that reduce waste and promote a circular economy. For instance, simply replacing plastic forks with wooden ones still results in waste. Instead, we should focus on developing and implementing reusable alternatives that can significantly reduce overall waste generation.

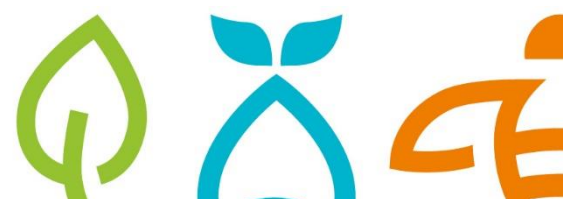
An example of a successful initiative is the community cup reuse programmes, which encourage the use of reusable cups within local communities. Such programmes not only reduce single-use plastic waste but also foster a culture of sustainability and shared responsibility.

By partnering with businesses and communities to promote reusable solutions and sustainable practices, we can make a more substantial impact on reducing waste and enhancing recycling efforts. This approach will not only support our environmental goals but also drive innovation and positive behavioural change within Wales.

Workplace Regulations

While the new workplace regulations are a step towards improving recycling practices, there is a pressing need for more support and engagement to clarify the regulations and aid in setting up effective collection systems to individual businesses, especially SMEs.

A useful comparison can be made between kerbside rollout and the workplace rollout. Whereas households benefit from direct and individualised communication, businesses often received only limited support through webinars or website updates. This disparity highlights the need for more tailored assistance to businesses.



Together, we stand for
a world beyond waste

Businesses also require additional help as they do not have full control over bin usage in the same way that householders do. The nature of waste generation in businesses, particularly in the tourism sector, differs significantly from household waste. This sector often relies on the public to use bins correctly, which can lead to owners having to segregate waste themselves.

In addition, many businesses are concerned about the additional costs associated with the new workplace regulations, particularly as they feel these costs are often dictated by larger collection companies. For example, the mandate for minimum fortnightly collections can impose financial strain on smaller enterprises when collection is otherwise not necessary.

It's important to recognise and address the complexities that vary across Wales, offering targeted support where needed. The unique challenges faced by different sectors and regions must be considered to ensure the successful implementation of the new regulations.

Preparedness of the waste sector and infrastructure investment requirements.

As detailed above, the implementation of new workplace regulations has taken many businesses by surprise, but the resource sector has demonstrated readiness and preparedness. For instance, there are already flexible processing plants and advancements in fibre recycling capabilities ready for support Wales' aims.

However, processing plants will need to rely on alternative/additional feedstock to ensure continuous operation and efficiency. This reliance highlights the importance of having a diverse and resilient supply chain for recyclable materials that may have to be relied on by support outside of Wales.

While infrastructure and preparedness of Welsh resource sector is adequate, it's also crucial to recognise that the best economic and environmental solutions may not always be found within Wales. This reality should not result in penalties. Instead, we should adopt a pragmatic approach that allows for flexibility in sourcing and processing locations outside of Wales to achieve optimal outcomes.

However, this must be done in balance with the promotion of social value benefits of keeping materials within Wales. By emphasising the economic and environmental advantages of local processing, we can encourage investment in domestic infrastructure and support the circular economy further within Welsh regions.



Together, we stand for
a world beyond waste

To attract investment, we need to consider short, medium, and long-term goals. By setting clear and achievable targets, we can create a more attractive environment for investors, fostering growth and innovation in the waste sector.

UK Internal Market Act.

While the UK Internal Market Act is seen by some as a barrier to devolved policy making, it brings businesses, such as packaging producers, from across borders to work in line with each other. This alignment can enhance the efficiency and effectiveness of recycling efforts.

There is a positivity that the UK Internal Market Act can help avoid scenarios like the Deposit Return Scheme (DRS) in Scotland, where regional discrepancies led to complications. A unified approach ensures cohesive and efficient recycling practices across the UK.

The UK Internal Market Act would promote a stable and predictable regulatory environment which can potentially attract increased investment into Wales' recycling infrastructure. Investors are more likely to fund projects when they have confidence in consistent regulations and market access. A unified market assures investors that their investments will benefit the entire UK, including Wales.

The integrated market framework supports the principles of a circular economy by facilitating the flow of recycled materials and products across the UK. Wales can contribute significantly to the circular economy goals by ensuring high recycling standards and practices. The UK Internal Market could be used as a tool to better facilitate this circular economy.

