

Huw Irranca-Davies MS

Deputy First Minister and Cabinet Secretary for Climate  
Change and Rural Affairs

19 September 2024

Dear Huw,

### **Inquiry into waste in Wales**

During the summer term 2024, the Climate Change, Environment and Infrastructure Committee (the Committee) undertook a one-day inquiry into waste in Wales. The inquiry focused on progress towards delivery of the Welsh Government's circular economy strategy, [Beyond Recycling](#) (March 2021), including the 2025 targets.

To inform our work, we took evidence from policy experts, and representatives from the waste management and business sectors. Further details can be found on the [Committee's webpage](#).

We are grateful to you for providing written evidence and for responding to our questions on waste during your appearance before us on [26 June 2024](#).

Following your appearance, the Committee agreed I should write to you to set out its views on key issues raised during the inquiry, and to ask for clarification and/or further information on certain matters.

### ***What next for recycling?***

Over the last two decades, Wales has made great strides towards becoming a high recycling society and in June 2024 became the [second best recycling nation in the world](#). This is commendable and, as pointed out in evidence to us, is due to the collective effort of successive Welsh Governments, local authorities, the waste management sector and the public.

While we do not wish to detract from Wales' recycling success, we note that progress has slowed in recent years and the latest figures (2022-23) show considerable variation across local authorities in terms of performance. While five out of the 22 authorities have already met the statutory target of 70% recycling from 2024-25, five have failed to meet the current target of 64%, which came into effect from 2020-21.



Local government representatives cited delays to service changes due to the COVID-19 pandemic and lack of clarity on future service requirements as reasons for the slowing of progress. They also explained factors outside authorities' control affect recycling performance, for example, rurality and high numbers of Houses in Multiple Occupation/flats/tourist accommodation.

In commenting on progress towards the 70% target, one representative told us, “[authorities are] starting to realise that a lot of what you would call the low-hanging fruit we've done”, as such, achieving the target would be challenging. It is currently anticipated that around half of authorities will meet the 70% target.

The Welsh Government's [Collections Blueprint](#) (the Blueprint) has played an important role in improving recycling rates. Although the Blueprint was published over a decade ago, there are still some authorities that have yet to adopt it.

We heard that a significant amount of recyclable material ends up in the residual waste stream. According to WRAP Cymru's [Compositional Analysis of Municipal Waste and Litter](#) (June 2023), 36.5% of kerbside residual waste was widely recyclable. Of this, 24.7% was food waste and 11.8% dry recycling materials. We would be interested in hearing how you intend to use these findings to further support authorities to achieve the 70% recycling target and future, more ambitious targets.

There was general consensus that the statutory targets, which were set in 2010, have played an important part in driving recycling performance. Several contributors were, therefore, keen for further targets to be set, and at an early stage, to provide clear direction and continue momentum. This aligns with the UK Climate Committee's recommendation that the Welsh Government “set ambitious recycling targets for 2030 and beyond, improving on the 70% target for 2025”, as a priority. Although the Welsh Government has accepted this recommendation, your letter, dated 24 July 2024, fails to provide us with assurance that progress is being made towards the development of future targets, which is disappointing.

1. We would like you to explain the steps you have taken, or intend to take, to encourage local authorities who have yet to adopt the Welsh Government's Collection Blueprint to do so, ensuring greater consistency in recycling services across authorities.
2. We would like you to provide the timescale you are working towards for the review of the Collection Blueprint.
3. We would welcome an explanation of whether and how you are using, or intend to use, WRAP Cymru's [Compositional Analysis of Municipal Waste and Litter](#) (June 2023) to inform policy that targets recyclable materials in the municipal waste stream.
4. We would like details of the timeframe you are working towards for the development of further recycling targets to maintain a trajectory towards zero waste by 2050, including when you anticipate bringing forward regulations to set those targets.

### *Deposit Return Scheme*

The Deposit Return Scheme (DRS) has been beset by delays since it was first announced. We note it will now launch in October 2027, four years later than planned. Several contributors expressed frustration at the delay, highlighting the benefits of DRS, including higher collection rates, a reduction

in litter and improved circularity. According to Reloop, the latest two year delay would result in 647 million PET bottles, 332 million cans and 61 million glass bottles being landfilled, littered or incinerated in Wales. In relation to cans, this equates to lost revenue for Wales of around €5 million, as a rough estimate. Furthermore, Reloop told us the delay is “harming the transition to reuse”. It explained:

*“We very much see that the future of deposit return is a slow transition to more reusable packaging...it's not just about collecting single-use packaging, it's about creating a new mindset and actually charting a pathway into a system where we have more reusable packaging and we can see real waste prevention.”*

Reloop told us global evidence shows DRS is “the No.1 fighter of litter”. Keep Wales Tidy echoed this, emphasising DRS in Wales would support ‘on-the-go’ recycling infrastructure, which “we desperately need”.

In contrast, local government representatives, the Chartered Institution of Wastes Management and the Federation of Small Businesses welcomed the delay, highlighting the need to understand the impact of the forthcoming EPR for plastic packaging before introducing the DRS and to provide time for industry and other key partners to prepare. They also highlighted a range of challenges that would need to be addressed ahead of introduction, including those relating to infrastructure. We heard that a [digital DRS](#) offers potential solutions to some of these challenges, with local government representatives providing positive feedback on the [Brecon trial](#).

The FSB said the DRS “risks placing additional burdens on small businesses” and suggested certain exemptions. It emphasised the importance of clearly communicating changes to businesses, and for support and advice to be available at an early stage and be easily accessible.

As a Committee, we have previously expressed our disappointment at the delay to the DRS. Notwithstanding your [Written Statement](#) in April 2024, we are concerned that the UK Internal Market Act decision, which halted the DRS in Scotland, has impacted on the timeline for the DRS in Wales. We would be interested in hearing whether, following the recent change in UK Government, you intend to pursue a more ambitious timeframe. While we recognise there is still considerable work to do to prepare for implementation of the DRS, we are keen to see it progress at the earliest opportunity.

5. We would welcome an explanation of when and how you intend to scale up trials to further inform thinking on a digital DRS.

6. We would like you to clarify whether you intend to pursue a more ambitious timeframe for the introduction of DRS, in light of the recent change in UK Government.

7. We would welcome details of:

- how you are supporting, or plan to support, SMEs to prepare for the introduction of the DRS, and
- timelines you are working towards for a review of permitted development rights relating to DRS infrastructure.

*Extended Producer Responsibility*



Like the DRS, packaging Extended Producer Responsibility (EPR) has been subject to further delay. It will now take effect from October 2025, two years later than planned. EPR will operate on a UK-wide basis and will be overseen by a Scheme Administrator. Local government representatives referred to the delay as “unfortunate”, recognising EPR as a source of additional funding for authorities.

Local government representatives raised concern about “how the funding arrangements will work”, referring to them as “overly complex” with “potential perverse incentives”. They told us:

*“A key concern is how the different Policy Context in Wales will be accounted for in the [‘Efficiency and Effectiveness payment’] model. Recycling rates are much higher than the rest of the UK and the assessment of what waste services should cost must account for this different context. If more is spent by Welsh councils because of their more extensive recycling efforts, the risk is they will appear high cost.”*

In addition, they explained the ‘Effectiveness’ element operates on the basis of a deduction in payments for services not deemed to be effective, rather than rewarding good performance. They also said:

*“we don’t know is what element of EPR funding will go towards those poor performers to increase their performance. And I think, from a Welsh Government and a WLGA point of view, there is a slight frustration that we’ve invested millions in services across Wales—we’ve got very good services—and we wouldn’t want a perverse outcome that, because you haven’t bothered with your waste services for a number of years, suddenly you get additional funding to enable you to improve those services.”*

We share the concerns raised by local government representatives. It would be grossly unfair if authorities in Wales are penalised for their efforts to date in improving recycling rates.

8. We would like you to explain how you are working to ensure Welsh local authorities receive their fair share of funding through Extended Producer Responsibility, recognising that recycling rates are higher in Wales than the other UK nations.

### *Moving up the waste hierarchy*

There was general consensus among contributors that a shift in emphasis up the waste hierarchy is needed, with a greater focus on sustainable consumption, waste prevention, repair and reuse. Resource Futures told us the findings of its study, [National authority waste composition in Wales](#), showed “gains to be achieved in municipal recycling rates will become increasingly marginal”. It recommended, “focusing further up the waste hierarchy with a national conversation about the impact of our consumption and more support for circular businesses, repair and reuse”.

We heard that repair and reuse are the building blocks for a circular economy. Apart from the environmental benefits, they provide wider social and economic benefits, supporting households

through the cost-of-living crisis, creating jobs and skilled volunteering opportunities, and helping to regenerate town centres.

The majority of repair and reuse initiatives are driven by third sector organisations and volunteers, and are reliant on Welsh Government grant funding. Contributors, including Repair Café Wales and Bentyg Cymru emphasised the importance of long-term funding to enable initiatives to become self-sustaining, with a suggestion of three-year funding allocations.

We were encouraged to hear from WRAP Cymru and Resource Futures of a strong appetite among the Welsh public for repair and reuse. According to WRAP Cymru's [Citizens insight: Reuse, Repair and Rental in Wales](#) (Spring 2023), 60% of people are open to purchasing pre-loved items; 58% are open to short-term leasing; 73% are open to repairing items; and 44% would consider using a repair café. The Welsh Government should capitalise on this by providing the right incentives and support for repair and reuse to scale up.

WRAP Cymru told us it was consulting on a [Routemap Towards a Universal Culture of Repair and Reuse in Wales](#). The Routemap sets out immediate actions that need to be taken by the Welsh Government and other relevant actors to foster a repair and re-use culture. Resource Futures identified areas of support that are needed at a UK level, for example the right to repair and 'ecodesign' policies, fiscal policies, such as reducing VAT on repair and second-hand goods, and use of EPR to incentivise and financially support repair and reuse. ReLoop explained France had legislated to ensure 5% of EPR fees are dedicated to improve reuse infrastructure.

Several contributors emphasised the importance of capturing data on repair and reuse, calling for the Welsh Government to establish targets and transparently measure progress.

9. We would like you to clarify whether and how you intend to use WRAP Cymru's Routemap Towards a Universal Culture of Repair and Reuse in Wales to inform policy and accelerate action on reuse and repair.

10. We would like you to consider:

- putting in place appropriate arrangements to capture data on repair and reuse, working with local authorities and other relevant partners.
- setting targets for repair and reuse, to help drive progress and direct investment.

11. We would like you to report back to the Committee on how you are engaging the UK Government in discussion on potential UK wide measures to incentivise and support reuse and repair. In particular, using EPR to incentivise design for repairability and to fund reuse and repair initiatives.

### *Tackling avoidable food waste*

Beyond Recycling identifies 'eradicating food waste' as a priority action, setting targets of a 50% reduction in avoidable food waste by 2025 and a 60% reduction by 2030, against a 2006-2007 baseline. While we welcome the Welsh Government's level of ambition, the evidence we received suggests there is a significant risk the targets will not be met without additional action.

The [latest estimates of food and drink waste generated by Welsh households](#) (March 2024), which are for 2021-22, show a 5% reduction in food waste against the baseline, compared to a 23% reduction in

2015. According to WRAP Cymru, "It is likely that the increase in food waste in 2021 was partly the result of an increase in food purchased and consumed in the home", with people spending more time at home due to COVID-19 restrictions. Furthermore, WRAP Cymru noted "the cost-of-living crisis had yet to begin and the cost of food relative to average incomes was lower than any time over the preceding decade". It added, "the increase in food waste seen in 2021 is not necessarily an indication in an upward trend in household food waste". Nevertheless, WRAP Cymru told us, more effort and more resource" will be required to meet the 2025 target, and "There's a whole host of activity that needs ramping up if we're going to hit the 2030 target".

We are aware that a significant amount of work/research has been completed in this policy area in recent years, including [WRAP Cymru's Welsh Food Waste Routemap](#) (May 2023), referred to in the recently published [Food Matters: Wales](#) (July 2024). It is unclear whether the Welsh Government has formally adopted the Routemap, or whether/how it is being used to shape policy and accelerate action on food waste. We would welcome clarification on this issue.

The evidence we received suggests there is currently no robust methodology for monitoring and tracking progress towards the food waste targets, with current estimates only available for household food waste. WRAP Cymru referred to challenges in developing a methodology for business food waste due to a lack of data, but suggested the Workplace Recycling Regulations will likely help to address this. It told us, "we'll be working closely with the Welsh Government this year to look at an approach to food waste measurement for Wales, with the emphasis on monitoring...It's definitely something that needs more work".

When setting targets it is essential to ensure that robust arrangements are in place to monitor progress. The targets were set over three years ago, and the 2025 target is less than a year away. It is disappointing the Welsh Government has yet to develop a comprehensive framework for measuring and monitoring progress towards its food waste targets.

12. We would welcome clarification on whether you have formally adopted WRAP Cymru's Welsh Food Waste Routemap (May 2023). If so, we would welcome details of the timelines you are working toward to take forward the interventions set out in the Routemap.

13. If you have not formally adopted the Routemap, we would welcome an explanation of whether/how you are using, or intend to use, it, along with the Household Food and Drink Waste in Wales 2021-22 (March 2024), to inform policy and accelerate action aimed at reducing avoidable food waste.

14. We would welcome further details of work being undertaken to develop a methodology to monitor progress towards the Welsh Government's food waste reduction targets and its wider ambition to eradicate avoidable food waste. This should include an indicative timeframe for completion of this work.

15. We would welcome an explanation of how you are currently monitoring the impact of policies/interventions aimed at reducing avoidable food waste outside of households.

*A Litter and Fly-tipping Prevention Plan for Wales?*

Beyond recycling highlights the Welsh Government's ambition for "a litter and fly-tipping free Wales", recognising their significant impact on the environment. It sets out a range of actions the Welsh Government will take to achieve its ambition, including restricting the sale of the most commonly littered single-use plastic items, implementation of a new Litter Prevention Plan for Wales and continued delivery of its Fly-tipping Strategy, [A Fly-tipping Free Wales](#).

In evidence to us, Keep Wales Tidy highlighted that, although Wales is "leading in the UK in terms of environmental ambition", the Welsh Government does not have a litter prevention plan, unlike the UK and Scottish Governments. Keep Wales Tidy explained it had been working with the Welsh Government on proposals for a prevention plan for over four years, expressing frustration that a final plan has yet to be published.

Keep Wales Tidy reported disparate approaches to litter management across local authorities, which is "a real hinderance towards public messaging". It considered a prevention plan would be key to addressing this issue. It emphasised the need for appropriate monitoring and reporting of progress towards delivery.

We note the Welsh Government has already consulted on a [draft Litter and Fly-tipping Prevention Plan for Wales \(January 2021\)](#). During your appearance before us, we asked for an update on its development. Your official told us, "there is a general emphasis on trying not to publish too many more documents, but whether or not we actually publish it in terms of a plan of action, we will be communicating what we're proposing to do and the timescales by which we're proposing to do it". Since then, you have issued a [Written Statement](#) providing an update on action to address litter and fly-tipping. While we welcome this, we are disappointed you have chosen not to publish a prevention plan, as originally intended. We believe a plan, with targets and timescales for delivery, would help provide clear direction, improve transparency and accessibility, and strengthen accountability.

Keep Wales Tidy explained that, while litter has decreased over the last decade, there has been a change in the types of litter found on streets, with an increase in fast-food litter of around 44%. It reported that a lot of fast-food chains have signed up to its Litter-Free Zones initiative. It added it was working with the Welsh Government to develop a voluntary code of practice for the fast food and takeaway sector, seeking to address the littering of 'on-the-go' food products. However, it asserted voluntary initiatives may be insufficient to deliver real change, and "sooner or later, we need to mandate [action] if we want real progress".

Keep Wales Tidy highlighted a lack of 'on-the-go' infrastructure. It was suggested that a potential unintended consequence of the Workplace Recycling Regulations would be the withdrawal of public bins, leading to an increase in littering.

**16. We believe you should reconsider your position and publish a Litter and Fly-tipping Prevention Plan for Wales, including targets and timescales for delivery of actions. If you are not minded to do this, we expect you to clarify the timescales you are working towards for the delivery of actions referred to in your Written Statement and how progress will be monitored and measured.**

**17. We would like you to report back to the Committee on any immediate plans to support 'on-the-go' recycling, in light of concerns around the potential unintended consequences of the Workplace Recycling Regulations and the delay in introducing a Deposit Return Scheme.**

I should be grateful for a response as soon as possible, and by 17 October at the latest.

Yours sincerely,



Llyr Gruffydd MS,  
Chair, Climate Change, Environment and Infrastructure Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg | We welcome correspondence in Welsh or English.

