

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid
Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change
and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: HIDCC/PO/0287/24

Llŷr Gruffydd MS
Chair
Climate Change, Environment and Infrastructure Committee
Welsh Parliament

18 October 2024

Dear Llŷr,

I am writing in response to your letter of 19 September 2024 in order to address the further questions that you posed. I have addressed each in turn below.

What next for recycling?

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.

Whilst the Blueprint is our best practice standard and not a legislative requirement, the majority of Welsh Local Authorities (LAs) have already adopted it, with more in the process of doing so. Caerphilly for example is the latest to commit to this course of action.

LAs are encouraged to adopt the Blueprint as it sets out the steps they can take to improve their service, to deliver the best economic, social and environmental outcomes and exceed the statutory minimum recycling targets. As LAs work to meet these targets, we provide access to comprehensive support, including funded expert advice and guidance to help plan the most effective approach. For LAs implementing changes to progress towards the Blueprint, significant capital funding is also available to support the investment into the infrastructure that is often necessary.

2. We would like you to provide the timescale you are working towards for the review of the Collection Blueprint.

The Collections Blueprint is currently being updated to be in line with the latest evidence and best practice across Wales. An early draft version has already been shared with LAs and our aim is to publish the updated Blueprint before the end of the year.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

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.

WRAP's compositional analysis is an important data source for a range of activities. This includes informing the development of future policy to address the remaining material within the residual stream. It also informs the actions that need to be taken by both WG and LAs, such as targeted comms campaigns such as that on food waste or improved enforcement of residual waste restrictions to support greater use of recycling services. The compositional analysis also helps the assessment of the impacts and benefits of policy instruments, such as the Extended Producer Responsibility (EPR) scheme for packaging and Deposit Return Scheme (DRS) for drinks containers. An important consideration being not just how might more be recycled, but also what changes can be made to prevent waste and reduce the quantum of material needing to be recycled in the first place.

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.

In line with the approach to targets taken to date, with the 70% target having come into place this year (2024/25) and with the last 64% target having been in place for 5 years (since 2019/20), the aim is for the next target to be in place by 2029/30 with the regulations being developed accordingly. In the meantime, we have been clear with LAs that they should be working to ensure their performance improvement will be in line with the trajectory to achieve zero waste by 2050.

Deposit Return Scheme

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

The digital DRS trial in Brecon is an important part of our wider approach to DRS which includes real world trials to inform the implementation of DRS and ensure it will be a success in Wales. The Brecon trial provided us with invaluable information about how digital technology could be used to integrate a deposit return scheme with our existing successful household collection services. Additionally, it gave us information on how consumers, businesses and local authorities can work together on a deposit return scheme. We are continuing to work with those involved in the trial, including to consider the potential for operating a further trial. In the meantime the next DRS trial will focus on reuse and is scheduled to take place in Newport in 2025.

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.

We are committed to the agreed timeline to introduce DRS in October 2027 as set out in the Joint Policy Statement agreed with the other UK nations' governments and published on 25 April 2024.

7. We would welcome details of:

▪ how you are supporting, or plan to support, SMEs to prepare for the introduction of the DRS,

As was outlined in the Joint Policy Statement published on 25 April 2024, in order to support SMEs with the implementation of DRS, there is an exemption for product lines with less than 5,000 units placed on the market across the UK per annum. In addition, we are actively engaging with a range of stakeholders, including SMEs at our roundtable sessions and through a specific Small Producers Sub-Group. Drawing from the considerable amount of international experience of introducing DRS schemes together with this engagement, one of the key messages was to allow sufficient time for preparations and this has been factored into the timetable and was an important consideration in deciding to introduce the scheme in 2027. International experience also underlines the key role that the appointed Deposit Management Organisation will play in providing businesses with the information needed to prepare for DRS launch including, for example, developing an operational blueprint for obligated businesses.

▪ and timelines you are working towards for a review of permitted development rights relating to DRS infrastructure.

A public consultation on Permitted Development Rights (PDRs) for Reverse Vending Machines is planned in late 2024. The responses will then be reviewed in early 2025 with the aim being to issue PDRs in the summer of 2025.

Extended Producer Responsibility

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.

Extended Producer Responsibility for packaging is a joint UK-wide programme and the development of the calculation of local authority payments is being undertaken in collaboration with officials from each of the four governments. Throughout the ongoing development of modelling assumptions, officials are working to ensure that the intended outcomes of the scheme are delivered, including in relation to delivering a fair allocation of funding to local authorities in Wales. This work has been informed by regular engagement with the Welsh Local Government Association (WLGA) who are represented in both the interim Scheme Administrator Steering Group and a Welsh Government-led finance working group which are informing the scheme's development and the preparations for commencement of the scheme's operation.

Moving up the waste hierarchy

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.

The route-map *Towards a Universal Culture of Repair and Re-Use* is a report the Welsh Government has commissioned WRAP to deliver this year on which there will be a public consultation. It is intended to help inform the Welsh Government's re-use and repair approach by inviting Welsh residents, businesses and organisations to share their opinions, insights and expertise on repair and re-use from which WRAP will develop a route map and a set of suggested actions. The aim being to inform how in Wales we can accelerate the move towards a universal culture of repair and re-use.

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.**

Work has been commissioned to assess what is needed to set up an appropriate monitoring and reporting protocol on the repair and re-use elements derived from Household Recycling Centres in Wales. Data on repair and lending is also obtained from the Repair Café and Benthg (Library of Things) network in Wales, which are supported by the Welsh Government. There are however reuse and repair activities in Wales which are carried out by a very diverse range of individual, community, social enterprise and private sector efforts – some of which use digital platforms that operate online. As items that are reused and repaired will often not meet the definition of being a ‘waste’ obtaining data cost effectively for all of this activity is not currently possible.

- **setting targets for repair and reuse, to help drive progress and direct investment.**

Whilst targets are a helpful policy instrument to drive change, they require the appropriate evidence base to inform any target setting. Work is currently being undertaken to build the necessary evidence base in the first instance, which can then inform the approach to targets. As highlighted above however, it is not currently possible to account for all reuse and repair activities in Wales and it is important that in setting any targets for LAs that it does not displace reuse and repair carried out by other actors, including those securing community and charitable benefit.

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.

One of the central aims of EPR is to incentivise improved design, resource efficiency and to support the move up the waste hierarchy. For example in developing the EPR scheme for packaging, we have been actively discussing with the UK and other Devolved Governments the scheme’s role in increasing the use of re-usable or refillable packaging. In addition, to inform our approach to EPR we have commissioned a report to look at the ways in which EPR can interface with repair and re-use to inform policy development. This will be equally relevant when considering EPR in relation to other materials such as textiles and electronics. With the new Secretary of State for DEFRA having set the Circular Economy as a key priority it also provides a greater opportunity for collaboration on UK-wide measures to support repair and reuse.

Tackling avoidable food waste

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.

We continuously engage with our delivery partners to draw from their experience and the reports that they deliver to inform our approach. WRAP Cymru’s Food Waste Routemap is a recent example of an insightful report on how we can tackle food waste and will inform the approach we take as a Government on food waste in Wales. It was not however intended as a formal Government publication and rather than producing multiple policy documents, the Welsh Government’s focus is on taking the action needed to move to a circular economy.

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.

WRAP's recommendations have been considered against our interventions aimed at tackling food waste, with the Routemap having identified manufacturing and household food waste as priority areas to reach the targets to reduce avoidable food waste. In taking action we are:

- Focusing the Be Mighty campaign on food waste prevention and furthering food waste recycling in 2024-25;
- Contributing towards the Courtauld 2030 voluntary commitment which brings together UK retailers and manufacturers to tackle food waste;
- Funding FareShare Cymru to roll out the redistribution of surplus edible food from businesses to those in need across the whole of Wales;
- Ensuring sustainability Food Clusters focus on resource efficiency and waste prevention in food and drink businesses;
- Ensuring the Welsh Government's [Climate Action Wales](#) campaign includes tips about reducing food waste and making sustainable food choices;
- Continuing to monitor the performance of separate household food waste collections in all local authorities in Wales; and,
- Implementing the new Workplace Recycling reforms which require all workplaces in Wales to separate food waste for collection.

The findings from the Household Food and Drink Waste in Wales 2021-22 (March 2024) report, have helped to shape the Be Mighty Campaign in 2024-25, for example focusing the campaign on foods commonly wasted in the home and the report will also be used to inform future campaigns and interventions.

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.

WRAP Cymru have started work on our behalf on a detailed methodology to monitor progress towards the Welsh Government's food waste reduction targets. The research will identify what primary data collection (household waste composition analysis; business commercial & industrial surveys) will be required to accurately estimate supply chain waste. The aim is for this to be completed by the end of March 2025.

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.

See the answer above in relation to the work commissioned. The Industrial and Commercial Waste Survey run by Natural Resources Wales [Natural Resources Wales / Industrial and Commercial Waste Survey 2018](#) also provides data on food waste from non-households and is currently the main mechanism for monitoring food waste reduction outside households. In addition an independent evaluation of the grant provided to FareShare Cymru has been commissioned. This evaluation will focus on the impact and future options for surplus edible food waste redistribution in Wales.

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.

I am keen we take a more focused, delivery orientated approach here in Wales and want to put our policies into practice, where appropriate. On this basis, I can confirm the Plan will remain unpublished and instead be used as a strategic framework to help coordinate our current and future work programmes.

With regards to timescales, several community focused actions in the Written Statement published on 17 July are being delivered by our partners, Keep Wales Tidy and Fly-tipping Action Wales and will be completed by the end of this financial year. We are currently developing proposals for future phases of these programmes and, subject to final funding agreement, will seek to build upon any successes of these varied projects. Those actions relating to legislation will be delivered over the coming years, with commencement of bans on single-use vapes and wet wipes containing plastic commencing in 2025 and 2026 respectively.

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.

The Workplace Recycling Regulations do not prevent provision of on-the-go recycling infrastructure. The requirement to present waste separately for collection, so as to be able to improve recycling and reduce the amount of waste sent to incineration or landfill, applies to non-domestic premises, with 'premises' being a broad term including land, park and open spaces. Occupiers of non-domestic premises are able to provide segregated litter bins to assist with them in meeting the requirement to present waste for collection in separate recyclable waste streams. This means that there simply needs to be appropriate provision for the recycling in line with the regulations, and there are many examples of land-owners that have embraced these changes by adopting best practice and providing separate litter bins that facilitate the separate collection of the specified recyclable materials.

Organisations may choose to remove litter bins for a variety of reasons, but commonly this is due to financial reasons, including the increasing cost of disposing residual waste. It is also however important to note that some organisations have removed litter bins to positively tackle and prevent litter issues. This has been done by some Local Authorities with the removal of roadside bins for example. At this stage there does not appear to be a broader, but we will continue to monitor this.

The Welsh Government is committed to ensuring that as part of the Extended Producer Responsibility (EPR) for packaging reforms, producers are responsible for the full costs of managing littered packaging including support for litter prevention campaigns. By placing the financial costs on producers, the aim is to incentivise producers to minimise this cost by redesigning or avoiding packaging materials, thereby reducing the amount of unnecessary packaging placed on the market and the likelihood of it being littered.

I hope you find this information helpful.

Yours sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name.

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