National Assembly for Wales Environment and Sustainability Committee

Inquiry into recycling in Wales

December 2014

Cynulliad Cenedlaethol Cymru National

National Assembly for **Wales**



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National Assembly for Wales

Environment and Sustainability Committee

Inquiry into recycling in Wales

December 2014

Cynulliad Cenedlaethol Cymru

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Environment and Sustainability Committee

The Committee was established on 22 June 2011 with a remit to examine legislation and hold the Welsh Government to account by scrutinising expenditure, administration and policy matters encompassing: the maintenance, development and planning of Wales's natural environment and energy resources.

Current Committee membership:



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Mick Antoniw Welsh Labour Pontypridd



Jeff Cuthbert Welsh Labour Caerphilly



Russell GeorgeWelsh Conservatives
Montgomeryshire



Llyr Huws Gruffydd Plaid Cymru North Wales



Julie Morgan Welsh Labour Cardiff North



William Powell Welsh Liberal Democrats Mid and West Wales



Jenny Rathbone Welsh Labour Cardiff Central



Antoinette Sandbach Welsh Conservatives North Wales



Joyce WatsonWelsh Labour
Mid and West Wales

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Introduction

- 1. In 2005, the Second Assembly's Environment, Planning and Countryside Committee, reported on its *Inquiry into meeting landfill and recycling targets*.
- 2. At that time it was clear that national and local government faced a significant challenge. Of equal importance was the challenge faced by the citizens of Wales; a challenge that would mean changing the way they thought about waste and the impact that they were having on the environment.
- 3. We make a number of recommendations in this report about how national and local government can continue to take steps towards recycling more, and raise some concerns about areas where progress could be improved. But none of this should detract from the overwhelmingly positive

"The response of the people of Wales to the challenge of recycling more has been outstanding"

message that has come through to us in this inquiry: the response of the people of Wales to the challenge of recycling more has been

outstanding. Without being complacent about the challenges to come, we are encouraged and enthused by the level of engagement and passion that there is for continuing to recycle as much of our waste as possible. Over 3,000 of you responded to this inquiry, the largest response to any Assembly inquiry, and that in itself was a demonstration to us of how engaged the people of Wales are with recycling.

4. The fact that so many young people responded makes us optimistic for the future and confident that, if national and local government can get the infrastructure right, then

"Over 3,000 of you responded to this inquiry, the largest response to any Assembly inquiry"

Wales can continue to meet the challenge of creating less waste and recycling more.

5. We found that:

- The response of the people of Wales to the challenge of recycling more has been outstanding;
- Wales is performing well but increasingly demanding targets are proving harder to meet and are not being met in some areas;
- There are 22 different approaches to waste collection in Wales, underpinned by three identifiable recycling collection methods. No single method of collecting recyclable resources from householders offers a clear lead in performance, cost or efficiency;
- Meeting weight-based targets for recycling must not detract from efforts to reduce waste. It is important to keep the overarching objective of reducing the ecological footprint of waste firmly in view; and
- A combination of good communication and engagement combined with a reduction in residual ("black bag") waste collections can further improve recycling rates. Whilst financial penalties could play a role in the future, it would be premature to consider their introduction until other avenues of encouragement have been exhausted.

6. We make the following recommendations:

Recommendation 1. We recommend that the Welsh Government commissions an independent review of the "Collections Blueprint" and the evidence it is based upon. In commissioning this review, the Government should:

- ensure that the Welsh Local Government Association is involved in establishing the terms of reference and selecting the reviewer;
- include an analysis of the latest data on reject rates and destination of recyclates from all collection methods;
- complete the review by the end of March 2016 so that it can inform the approach taken by local authorities to achieving the 2019/20 target of 64%. (Page 11)

Recommendation 2. We recommend that the Welsh Government encourages collaboration between local authorities when renewing contracts for providing householder receptacles for recyclable waste. (Page 12)

Recommendation 3. We recommend that the Welsh Government works with local authorities to make information on the destination of waste collected from householders publicly available. (Page 12)

Recommendation 4. We recommend that the Welsh Government investigates weight-based targets and whether they are having any unintended impact on reducing the ecological footprint of waste. This should be completed by the end of 2015. (Page 14)

Recommendation 5. We recommend that the Welsh Government commissions research into the relationship between projections for waste reduction; local authority income from waste; and the ability of local authorities to meet their recycling targets in the period to 2019/20 and then to 2024/25. This should be completed by the end of March 2016. (Page 15)

Recommendation 6. We recommend that the Welsh Government investigates the case for resourcing a national "broker" for the sale of recyclates from local authorities across Wales. The Government should publish its findings by the end of December 2015. (Page 15)

Recommendation 7. We recommend that the Welsh Government considers the merits of investing in a national campaign to help drive higher rates of recycling including to promote understanding of the need to reduce the ecological footprint of waste and the importance of other measures, particularly waste reduction. (Page 17)

A note on how we conducted this inquiry

We conducted this inquiry into recycling in Wales over a seven-month period, starting with a call for evidence in May 2014 and ending with the publication of this report in December 2014.

The inquiry is explained on our Storify page at: https://storify.com/assemblywales/inquiry-into-recyclewales

The evidence gathered is listed at the end of this report and can also be accessed from the inquiry website at:

www.senedd.assembly.wales/mglssueHistoryHome.aspx?IId=9794

The commentaries, conclusions and recommendations made in this report are based on this evidence.

1. How we are performing in Wales

Wales is performing well but increasingly demanding targets are proving harder to meet and are not being met by some local authorities.

There are 22 different approaches to waste collection in Wales and no one method of collecting recyclable resources from householders offers a clear lead in performance, cost or efficiency.

1. As a nation, Wales is achieving one of the highest overall recycling rates in the European Union. It is the only country in the United Kingdom to have introduced statutory targets for recycling.

What are the different methods of waste collection?

We found that every local authority in Wales collects waste in a different way, using different types of collection boxes and bags, different types of materials collecting and using different collecting schedules. Underpinning these differences are three identifiable methods of collecting dry recyclables (i.e. recyclable material other than food or garden waste). These methods have some unusual names and are explained below:

Kerbside sort – Dry recyclable waste is sorted into different materials at the kerbside i.e. at the point that it is collected (e.g. glass, plastic, paper and metal). This is the method advocated in the Welsh Government's Collections Blueprint. Nine local authorities operate a form of kerbside sort recycling in Wales.

Twin stream - Dry recyclable materials are collected in two separate containers. A common approach is to separate paper or glass from other dry recyclable materials. Five local authorities use the twin stream method.

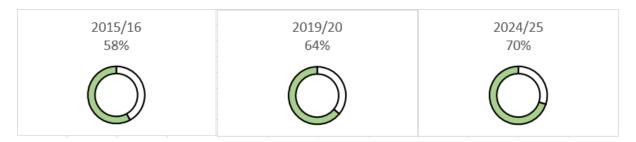
Co-mingled - Dry recyclable materials are collected in a single container and later sorted into different materials at a central location called a Materials Recovery Facility (MRF). Eight local authorities operate a comingled system.

- 2. Whilst there has been improvement in meeting recycling targets in Wales, nine of the 22 local authorities did not achieve the 52 per cent target for 2012/13 and, according to data from March 2014, three local authorities are yet to achieve this target.
- 3. The statutory targets are increasing and the task of reaching ever higher rates of recycling is going to become increasingly challenging, particularly in

the context of the current financial constraints placed on local authorities. A snapshot of local authority recycling practice shows that, as of December 2013, nine authorities were operating a form of kerbside recycling whilst five were operating twin stream and eight co-mingling.

4. Local recycling services have been developed over the past decade, with local authorities working towards achieving targets set by the Welsh Government, first in *Wise About Waste* published in 2002, and currently in *Towards Zero Waste* (2010) and the *Waste (Wales) Measure 2010* (58 per cent by 2015/16, 64 per cent by 2019/20 and 70 per cent by 2024/25).

Statutory recycling targets



- 5. When services were first being developed, local authorities were given the freedom to develop their own services for their local area. In his letter to us of 16 October 2014, the Minister for Natural Resources explained that the Sustainable Waste Management Grant (SWMG) did not come with stipulations for preferred methods of collection and processing of recyclables when it was first introduced in 2001/02, but it now has more conditions attached to it. This is because experience from the last decade of the different collection and processing methods has resulted in a clearer understanding of the "financial and environmental costs and benefits of different options."
- 6. Local authorities argue that recycling services are designed to reflect what works best in their area, and in consultation with their citizens, taking into account:
 - householder preference/willingness to participate in recycling;
 - space constraints in different types of residences;
 - access to residences (e.g. narrow rural roads or terraced housing); and
 - the cost of changing to a new system versus continuing with the current system.
- 7. The inquiry did not provide conclusive evidence that the Welsh Government's preferred kerbside sort method of collection results in higher

levels of recycling or that it is less expensive. The Auditor General for Wales stated that benchmarking results over the past three years suggest that no single method of collecting recyclable resources from householders offers a clear lead in performance, cost or efficiency. Evidence from the WLGA's Waste Finance Data Report 2012-13, provided by the Minister on 16 October 2014, shows that there is a wide variation in costs of recycling both across the 22 local authorities and within collection method sub-group. This report also states that overall costs have reduced for most local authorities between 2009-10 and 2011-12.

- 8. There are examples of both highly and poorly performing local authorities using all three collection methods. The Welsh Government, along with WRAP and Eunomia, stated that the evidence used in drawing up the Collections Blueprint shows that kerbside sort will deliver higher quality recyclates that enable the higher recycling targets to be met, and that differences between methods will be more discernible in the future.
- 9. Currently, there is a lack of transparency around reject rates and final recyclate destinations, particularly when waste is sorted at Materials Recovery Facilities (MRFs). This should become clearer as better data is built up following new regulations which have come into force, which require MRFs to monitor and report on the various waste streams they process, and their final destinations.

Our view

- 10. In August 2005, a predecessor of ours, the Environment, Planning and Countryside Committee, reported on its *Inquiry into meeting landfill and recycling targets*. That committee shared the same Chair as this Committee and had a membership that included the current Minister for Natural Resources and the current First Minister (then the Minister for Environment, Planning and Countryside).
- 11. At that time, the recycling rate for municipal waste was 10%. It is clear that substantial progress has been made in increasing the amount of waste that is recycled. The latest figures available to us show that rate is 54% for 2013-14.
- 12. The response of the people of Wales to the challenge of increasing the amount they recycle is to be commended. But there is still much to be done if Wales is to meet the higher rates of recycling required by domestic and European law. Recent benchmarking shows that some local authorities are already struggling to meet the targets required of them.

13. It is clear that the Welsh Government is convinced that its "Collections Blueprint" offers the best pathway to delivering higher recycling rates, better quality recyclable materials and greater efficiency. It is equally clear that its conviction is not shared by many local authorities. At present, no single method of collecting recyclable resources from householders offers a clear lead in performance, cost or efficiency. We accept that this situation may change as the targets increase, but it is also possible that as technology advances the relative merits of non-blueprint collections models could also increase. We believe that the Welsh Government needs to do more if it is to convince local authorities, and us, that the benefits of the blueprint are beyond question.

We recommend that the Welsh Government commissions an independent review of the "Collections Blueprint" and the evidence it is based upon. In commissioning this review, the Government should:

- ensure that the Welsh Local Government Association is involved in establishing the terms of reference and selecting the reviewer;
- include an analysis of the latest data on reject rates and destination of recyclates from all collection methods;
- complete the review by the end of March 2016 so that it can inform the approach taken by local authorities to achieving the 2019/20 target of 64%.
- 14. It is essential that sufficient flexibility is allowed for the collection of materials, as the method of collection has to be adapted according to different environmental factors e.g. the type of housing stock and geography.
- 15. We do not believe that one particular method of collection is preferable, or that the freedom local authorities have to adapt their approach to meet local circumstances should be constrained so long as targets are being met. However, it is unfortunate that there has not been greater collaboration in the procurement of common household collection and sorting receptacles (i.e. bags, boxes and bins) and a more standardised approach to the colours and labelling used.
- 16. We believe that local authorities should take opportunities as contracts are renewed, and as local government is reorganised in the next few years, to move towards a more regularised approach across Wales.

17. As well as offering cost savings, this will further reinforce and enable good recycling practice by enabling clearer communication and better understanding.

We recommend that the Welsh Government encourages collaboration between local authorities when renewing contracts for providing householder receptacles for recyclable waste.

18. We believe that more should be done to inform householders about what happens to their recycling once it leaves the kerbside. The new reporting requirements placed on MRFs may assist in enabling this. It will also be interesting to see whether the provisions of the Well-being of Future Generations Bill, once commenced, will influence positive change in this area.

We recommend that the Welsh Government works with local authorities to make information on the destination of waste collected from householders publicly available.

2. Understanding the relationship between recycling collection practice and recycling rates

Meeting weight-based targets must not detract from efforts to reduce waste. It is important to keep the overarching objective of reducing the ecological footprint of waste firmly in view.

- 19. The following factors are considered by witnesses to affect recycling rates:
 - the range of materials targeted for collection (a greater range appears to encourage higher recycling rates);
 - restrictions on residual waste capacity;
 - communications with householders and periodic reinforcement of messages;
 - collection service reliability;
 - residents' understanding about what materials they should (or should not) be recycling;
 - packaging and product design barriers, making it impossible to easily identify and sort complex items into one of the separate material streams, both kerbside and at the Materials Recovery Facilities (MRFs);
 - low levels of participation in some demographic areas for cultural or lifestyle reasons; and
 - poor levels of extraction of materials at the point of disposal, giving low capture rates (due to a low level of motivation to recycle, space constraints etc.).
- 20. Several witnesses commented on the appropriateness of weight based targets for recycling as we move towards the higher targets. Their view was that weight based targets may drive the wrong behaviours from local authorities for the following reasons:
 - They create a temptation to focus on the collection of heavier items, regardless of their value for reprocessing (quality), as this gives a higher percentage of recycled waste;
 - Weight based targets provide little or no incentive for local authorities to encourage reduction of overall waste production, or to encourage activities such as home composting of garden waste, as this removes heavy waste streams from their recycling figures; and

- Positive initiatives, such as manufacturers reducing the amount of packaging they use, and reductions in the weight of glass and plastic packaging, are perceived as making it more difficult for local authorities to achieve their targets.
- 21. Local authorities also stated that initiatives banning certain wastestreams (such as paper junk-mail) would affect them negatively in financial terms. Conwy CBC argued for national collaboration on the marketing of collected materials, to enable local authorities to get the best possible price for them.
- 22. In its overarching strategy, <u>Towards Zero Waste</u>, the Welsh Government promotes the waste hierarchy, beginning with waste prevention, then preparing for reuse, recycling, other recovery and, finally, disposal. In its 2012 report, <u>Public Participation in Waste Recycling</u>, Wales Audit Office argues that the Welsh Government will not reach its target of a 75 per cent reduction in the ecological footprint of waste by 2050 if Wales does not significantly reduce waste production as well as increase recycling rates.

Our view

- 23. Whilst weight-based targets have provided an indication of the level of waste earmarked for recycling, it is not a particularly sophisticated measure and could unintentionally begin to drive behaviours that are in conflict with the overarching objective of reducing the ecological footprint of waste in Wales.
- 24. Reducing waste, in comparison with higher levels of recycling, has the potential to have a much bigger impact on reducing the ecological footprint of waste. It is vital that efforts to increase recycling rates do not, perversely, discourage waste reduction measures. It is fair to note that if waste reduction measures are successfully implemented then there could be consequences for local authorities in terms of the income available from the sale of recyclates and in meeting weight-based targets. If it were to become apparent that this was developing, then there may need to be a level of intervention from the Welsh Government to address this.

We recommend that the Welsh Government investigates weight-based targets and whether they are having any unintended impact on reducing the ecological footprint of waste. This should be completed by the end of 2015.

We recommend that the Welsh Government commissions research into the relationship between projections for waste reduction; local authority income from waste; and the ability of local authorities to meet their recycling targets in the period to 2019/20 and then to 2024/25. This should be completed by the end of March 2016.

25. We also heard the suggestion that the establishment of a national broker for the sale of recyclates from local authorities could offer some benefits such as reducing costs to individual authorities and enabling them to secure a better price for their materials.

We recommend that the Welsh Government investigates the case for resourcing a national "broker" for the sale of recyclates from local authorities across Wales. The Government should publish its findings by the end of December 2015.

3. How we can improve

A combination of good communication and engagement combined with a reduction in residual ("black bag") waste collections can further improve recycling rates. Whilst financial penalties could play a role in the future, it would be premature to consider their introduction until other avenues of encouragement have been exhausted.

- 26. Local authorities use a variety of methods to communicate their services, including:
 - leaflets through residents' doors;
 - press adverts;
 - websites;
 - direct, door-to-door contact with local residents;
 - text reminder services;
 - apps for smartphones; and
 - social media (including YouTube).
- 27. The WLGA referred to previous Welsh Government national campaigns on recycling, and stated that they had been in discussion with the 22 local authority heads of waste, who would welcome "a national re-statement of the importance of recycling" from the Welsh Government, along with an explanation of how this fits with the wider aims of society and the importance of a circular economy to economic growth.
- 28. Lack of information about what is and is not recyclable was given as one of the top three barriers to recycling more by respondents to our public survey. Better information on what can be recycled and more information on the environmental benefits of recycling were also given as two of the top suggestions from the public survey for encouraging higher levels of recycling. Good availability of recycling services, with frequent collections and an easy to understand system of collection were also seen as important for high levels of recycling.
- 29. Most witnesses were open to the idea that there may need to be penalties in future for citizens who choose not to recycle, if targets are to be met. However, none of the witnesses felt that other avenues of encouragement have been exhausted yet. Potential incentives for recycling were discussed, including celebrating the highest levels of recycling in the community in some way, or giving citizens a reimbursement on the waste

part of their Council Tax Bill. No clear conclusions were drawn and the majority of witnesses still felt that good communication and engagement combined with reduction in residual waste collections were the best way to increase recycling. However, the WLGA emphasised the need for more innovative ways of encouraging people to recycle in future, if the higher targets are to be met.

30. The Minister said that he did not want to impose financial penalties on local authorities that fail to achieve their targets so long as they could prove that they were taking every possible action to do so. However, there are penalties for those that fail to achieve their targets. The Welsh Government has powers to impose penalties of £200 per tonne of waste that local authorities fall short of their targets. No local authorities have been fined for failing to achieve their targets so far.

Our view

- 31. It is clear to us (not least from the excellent response to this inquiry) that citizens are engaged in recycling and that the debate is no longer one of whether to recycle or not, but rather about how we can recycle more. We also heard though, through our survey, that more could be done in terms of communication at both a local and national level.
- 32. We believe that there is space for a national campaign to assist in the drive towards meeting the higher levels of recycling that will be required in the next few years. The high levels of public engagement and enthusiasm around the issue of recycling provides an excellent foundation from which to develop the communication of other aspects of waste policy that have the potential to have a greater impact on reducing the ecological footprint than recycling in isolation waste reduction in particular.

We recommend that the Welsh Government considers the merits of investing in a national campaign to help drive higher rates of recycling including to promote understanding of the need to reduce the ecological footprint of waste and the importance of other measures, particularly waste reduction.

33. During the inquiry, we also considered the use of penalties, both at the householder level for those not engaging with recycling and at a local authority level where an authority was not meeting statutory targets. Based on the evidence we took, it is clear that such measures are currently unnecessary and that there is still more that can be done to positively encourage behaviour change. We acknowledge that there may be

circumstances in the future that would necessitate the use of such penalties, but are satisfied that they are not necessary at present.

- 34. Softer measures to encourage higher rates of recycling, such as reducing the frequency and volume of residual waste collections, can have a positive effect if managed properly. If a broad range of materials is collected for recycling and composting, then residual waste at a household level should be reducing. Scaling back residual waste collections should not impact on those households that are participating fully with the waste management approach in their area.
- 35. We recognise that local authorities are best placed to make decisions on the approach that would yield the best outcome in their area.

4. The Waste Regulations Route Map

The Minister has adequately addressed the concern raised by local authorities around a potential conflict between the statutory guidance and the *Local Government (Wales) Measure 2009* duty to consult.

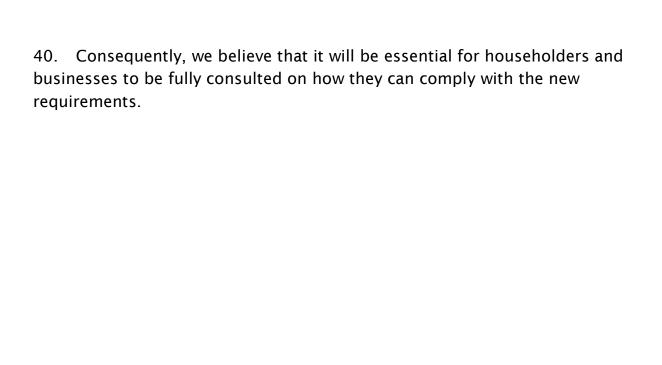
36. On 28 April 2014 the then Minister for Natural Resources and Food launched a consultation on statutory guidance to support organisations and businesses affected by the EU requirements outlined above. The consultation closed on 21 July 2014 and asked:

"Do you consider the statutory guidance sets out clearly how the Welsh Government considers establishments and undertakings that collect, transport or receive waste paper, metal, plastic and glass should comply with the legal requirements laid down in Regulations 13 and 14 of the Waste (England and Wales) Regulations 2011, as amended by the Waste (England and Wales) (Amendment) Regulations 2012?"

- 37. Local authorities disagreed with the section of the draft guidance that states: "The definition of practicability does not allow for householder [...] preferences about collection methods."
- 38. Following the Minister's scrutiny session on 1 October, we wrote to him asking about the potential conflict between a local authority's duty to consult with its citizens about services, and the statutory guidance. The Minister responded stating there is no conflict between the local authority duty to consult, set out in the *Local Government (Wales) Measure 2009*, and the statutory guidance. This is because, where technically, environmentally and economically practicable, the separate collection of paper, metal, plastic and glass will be a legal requirement, just as there are other legal requirements that must be complied with regardless of residents' preference. Local authorities can still comply with their duty to consult by consulting with residents on how they can comply with the requirement for separate collections in the best way for residents.

Our view

39. We are content that the Minister has adequately addressed the concern raised by local authorities around a potential conflict between the statutory guidance and the *Local Government (Wales) Measure 2009* duty to consult.



Annexe A - Terms of reference

The purpose of this inquiry is to explore current local authority household waste recycling practice and arrangements across Wales. The inquiry will look at all waste materials, including food and garden waste. The Committee aims to:

- explore reasons for and impacts of variations in local authority household waste recycling practice in Wales;
- consider to what extent local authorities' recycling practice aligns with the Welsh Government's Municipal Waste Sector Plan Collections Blueprint, and to explore barriers and enablers to adherence;
- assess the availability of information and guidance to householders about why and how they should be recycling, and to explore potential barriers and enablers to improving recycling rates;
- explore Local Authority reactions to the recently published Waste
 Regulations Route Map and the potential impacts and implications of this on recycling practice across Wales; and
- gain greater understanding of the relationship between recycling collection practice and recycling rates.

Annexe B - Witnesses

The following witnesses gave evidence to the Committee. Transcripts of the meetings can be viewed at

www.senedd.assembly.wales/mglssueHistoryHome.aspx?lld=1308

25 JUNE 2014					
Session 1					
Jane Holownia	Wales Audit Office				
Andy Phillips	Wales Audit Office				
Session 2					
Mark S. Williams	Caerphilly County Borough Council				
Andrew Wilkinson	Conwy County Borough Council				
Alan L. Roberts	Denbighshire County Council				
Stephen Thomas	Merthyr Tydfil County Borough Council				
Richard Brown	Pembrokeshire County Council				
Session 3					
Isobel Moore	Natural Resources Wales				
Nadia De Longhi	Natural Resources Wales				
17 JULY 2014					
Session 4					
Rebecca Colley-Jones	Chartered Institute of Wastes Management				
Steve Lee	Chartered Institute of Wastes Management				
Session 5	Session 5				
Lee Marshall	Local Authority Recycling Advisory Committee				
Craig Mitchell	Waste Awareness Wales				
Dan Finch	Waste Awareness Wales				
Session 6					
Marcus Gover	WRAP Cymru				
Dr Dominic Hogg	Eunomia				

1 OCTOBER 2014				
Session 7				
Carl Sargeant AM	Minister for Natural Resources			
Jasper Roberts	Welsh Government			
Russell Owens	Welsh Government			

Annexe C - Written Evidence

The following written evidence was received. All written evidence can be viewed in full at

 $\underline{www.senedd.assembly.wales/mgConsultationDisplay.aspx?ID=128}$

Organisation or individual	Reference
Helen Meakins	RW 1
John Matheson	RW 2
Olwen Davies	RW 3
Jim Davies	RW 4
Anonymous	RW 5
Simon Lait	RW 6
Don Bell	RW 7
Edgar Lloyd	RW 8
Dafydd Brown	RW 9
Valerie Provence	RW 10
Mrs E A Pepper	RW 11
Dulstrac	RW 12
Goule Robert	RW 13
Gerry Gillespie	RW 14
Richard James	RW 15
Zero Waste Wales	RW 16
Nigel Yates	RW 17
Bryson Recycling	RW 18
Phillip Jones	RW 19
Jill Jones	RW 20
Carol Aldridge	RW 21
Judith Pritchard	RW 22
Mike Maguire	RW 23
Brian Gray	RW 24

Ian Powe	RW 25
Jan Lewis	RW 26
Natural Resources Wales	RW 27
Welsh Local Government Association	RW 28
C J Begley	RW 29
Chartered Institution of Wastes Management	RW 30
Institute for Zero Waste in Africa	RW 31
Local Authority Recycling Advisory Committee	RW 32
Caerphilly County Borough Council	RW 33
Axion	RW 34
Monmouthshire County Council	RW 35
Vale of Glamorgan Council	RW 36
Wales Audit Office	RW 37
Eunomia Research & Consulting Ltd	RW 38
DS Smith	RW 39
Duncan McIntoshs	RW 40
Viridor	RW 41
John Prosser	RW 42
Wendy Johnson	RW 43
Denbighshire County Council	RW 44
WRAP Cymru	RW 45
Mrs A Jones	RW 46
Clive Payne	RW 47
Mark Thomas	RW 48
H M Cooper	RW 49
Rev V Fernandez	RW 50