

Compliance with the
Waste (England and Wales) Regulations 2011
TEEP Assessment for Nottinghamshire County Council WDA

Introduction

1. The Waste (England and Wales) Regulations 2011 requires all waste collectors including local authorities to apply the waste hierarchy (Regulation 12), and to assess if they are able to implement separate collections of glass, metal, paper and plastics, where this is “Technically, environmentally and economically practicable” (Regulation 13). This has become known as a ‘TEEP’ assessment.
2. In order to meet these requirements the Nottinghamshire Waste Partnership (NWP) through its Joint Waste Management Committee has agreed to jointly carry out the assessment in the interest of synergy and flexibility in future developments. This assessment therefore includes the seven Waste Collection Authorities (WCA) of Ashfield District Council, Bassetlaw District Council, Broxtowe Borough Council, Gedling Borough Council, Mansfield District Council, Newark and Sherwood District Council, Rushcliffe Borough Council and the Waste Disposal Authority (WDA): Nottinghamshire County Council, but excludes Nottingham City Council who will be undertaking their own assessment.
3. The data and results from each of the authorities have been compiled and are incorporated into this report as a single document for ease of use. The Regulations apply directly to the WCA undertaking the collections and the WDA in respect of Recycling Centres only, as such they will all individually need to take their own view on the applicability of the assessment, and individual sign-off requirements within their Council Scheme of Delegation.
4. In conducting the assessment, the authorities utilised the Waste Resources Action Programme (WRAP) route map and Staffordshire Waste Partnership questionnaire templates in order to understand the steps required for compliance, and the document therefore follows the structure of the route map.

Background

5. The County of Nottinghamshire is the 11th largest local authority in the United Kingdom and is geographically diverse with a mix of rural and urban areas, market towns and villages spread over 805 square miles with a population of 796,000. The County Council area is two tier with 4 Districts: Ashfield, Bassetlaw, Mansfield, and Newark and Sherwood, and 3 Boroughs: Broxtowe, Gedling and Rushcliffe.
6. Nottinghamshire County Council (The County) is a WDA with a statutory duty under the Environmental Protection Act 1990 (EPA) and its attendant subordinate legislation to make arrangements for the disposal of Municipal Waste collected by the WCA in their areas. The collection services are all operated by internal Direct Service Organisations (DSO), of the WCA.
7. The NWP comprises the 7 WCA and the WDA. The benefits of collaborative working are recognised by all partner authorities and their work is overseen by the Joint Waste Management Committee (JWMC), consisting of Elected Members and senior officers from each of the partner authorities. The JWMC meet quarterly.

8. In addition, a dedicated forum has also been established for Senior Waste Officers across Nottinghamshire as well as representatives from Veolia (the County Council's waste contractor) to provide technical support and guidance regarding ongoing operational matters and also wider strategic themes. This is managed through an arena known as Joint Officer Board (JOB). These meetings also happen quarterly.

Historical Context

Waste Strategy

9. The County commissioned a report by the Consultancy: Enviros Aspinall in 1999 to look at existing waste collection and disposal methodology, and consider how this could be improved using best practice from across the United Kingdom and worldwide. The recommendations of the report informed the development of a "Municipal Waste Management Strategy for Nottinghamshire" published in 2001.
10. Consultation with stakeholders showed wide public support for the proposals contained within the Strategy, and in particular proposals focusing on additional recycling and composting schemes, particularly when allied to kerbside collections of segregated materials and the development of Material Recycling Facilities. With clear stakeholder support to the proposals made, the Municipal Waste Management Strategy for Nottinghamshire was adopted as the model for waste management service development over the next 20 years.
11. It was recognised that in order to deliver the infrastructure required for the medium to long term aspirations of the strategy that a waste contract would be required of suitable scope and duration to provide said infrastructure and required future performance levels.
12. The WCA and WDA agreed to pursue a system of alternate weekly collections of dry recyclables targeting paper, card, plastic bottles and metal cans and residual waste using a twin bin system, together with seasonal green garden waste collections in specific geographical areas, in order to meet statutory and emerging targets.
13. With financial support from DEFRA and the County Council, by 2005 all WCA's had implemented twin bins, supplemented by targeted green garden waste collections.

PFI Waste Contract

14. The Nottinghamshire Waste Management PFI Contract was awarded to a Veolia Special Purpose vehicle: Veolia Environmental Services Nottinghamshire, on 26th June 2006. It is a 26 year contract, which was procured to deliver the outputs identified in the Nottinghamshire Municipal Waste Management Strategy.
15. The overarching objectives of the Nottinghamshire Waste Management PFI Contract are to:

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- Focus on positive action to protect and improve the environment;
- Have regard to Best Value and affordability;
- Reduce the proportion of waste going to landfill;
- Conserve energy and raw materials;
- Support waste minimisation, re-use and recycling initiatives;
- Secure the optimum return on any assets used;
- Ensure that waste is treated / disposed of using one of the nearest facilities and the most appropriate methods and technologies;
- Meet the Government's performance standards for waste management;
- Be sufficiently flexible to allow for future changes in waste legislation and practice;
- Use and promote the principles of the waste hierarchy.

16. And to achieve targets to:

- Increase recycling incrementally throughout the life of the Contract to 52% by 2020;
- Ensure waste and recycling management would meet and exceed where appropriate the requirements of the Landfill Directive to incrementally reduce biodegradable waste to landfill to 35% of 1995 levels by 2020;
- Increase recycling at the Household Waste Recycling Centres (HWRCs) from 57% in 2006 to 60% by 2020;
- Endeavour to minimise the distance travelled by WCA's to delivery points to no more than 5 miles and/or a 15 minute drive-time from their boundaries.

Nottinghamshire Waste Partnership Agreement

17. The Nottinghamshire Waste Partnership Agreement is an agreement between Nottinghamshire County Council, the seven Nottinghamshire District and Borough Councils and Nottingham City Council and was approved by Members of Joint Waste Management Committee on 18th January 2012. The Agreement was signed on 17th April 2012.

18. The JWMC recognises the need to put effective long-term strategies in place to meet legislative, best value and consumer demand targets for reducing the production and treatment of Municipal Wastes. It is also recognised that markets are continually changing, as are the technology options for dealing with wastes. This reinforced the need to work in partnership to deliver a long-term sustainable waste strategy. The Partnership Agreement is a strategic document setting out the vision, and defining the governance structure, of the Board. It also formalises the collaboration of waste disposal and waste collection authorities.

19. The agreement is used to ensure the:

- development and implementation of sustainable waste management policies and practices to achieve best value for the people of Nottinghamshire and Nottingham City;
- establishment of a mutually beneficial framework for changes and development of waste collection and disposal services;

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- minimisation of waste generation in Nottinghamshire and Nottingham City and the management of waste in accordance with the waste hierarchy;
- maximisation of recycling and recovery levels from waste in order to meet or exceed European Union and United Kingdom targets as far as possible consistent with each party's capacity to fund those processes;
- maximisation of value and performance from waste management contracts to the mutual benefit of the parties involved and the people of Nottinghamshire and Nottingham City.

Material Recovery Facility

20. The contract Materials Recovery Facility (MRF) was designed to sort commingled kerbside collected mixed dry recyclables from WCA collections. The MRF which was opened in January 2009 is located in Mansfield. It was the first major facility to be developed under the Nottinghamshire Waste Management PFI Contract. The £16 million MRF has an 85,000 tonne per annum capacity and is used to sort all of the WCA kerbside recycling collections of mixed paper, card, cans and plastic bottles.
21. The MRF was designed and constructed to operate to a pre-agreed input specification which excluded glass processing, as there were concerns from the WDA, WCA and Veolia, regarding the quality of the paper and card from glass contamination if glass was included in the dry recycling bin. A view subsequently supported in a letter sent to all local authorities from Lord De Mauley on behalf of DEFRA in October 2013. The MRF location and its feeder network of 4 transfer stations, endeavours to achieve the contract aim to minimise the distance travelled by WCA's recycling collection vehicles to no more than 5 miles and / or a 15 minute drive-time from their boundaries.
22. Once transported to the MRF, the commingled material is loaded onto two conveyor belts and sent to the pre-sort area where contaminants and oversized items are picked out by hand to stop them damaging machinery further down the line process.
23. The waste then enters two trommells, and is spun around passing through different sized holes, like a giant sieve. This sorts the material into three groups: containers such as bottles and cans; newspapers and leaflets; and mixed papers, ready for the next stage of recycling.
24. Then a magnet removes the steel cans and tins. Magnetic forces are also used to extract aluminium in an eddy current separator. In the optical plastic sort, a near infrared sensor is used to sort the plastics which are then analysed and directed to the correct place by blasts of air.
25. In the final stages of sorting, workers manually sort through the recyclables and remove any more contaminants by hand.
26. All WCA's instruct crews to lift kerbside bin lids to visually check contamination prior to loading, and to reject any bins that are contaminated. All loads delivered to the MRF are subject to a visual check by Veolia in the reception hall, with a 5%

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contamination tolerance level. If the load looks above the tolerance level, then the load is rejected. All rejected loads are reported to WCAs, so that action can be taken on the round.

27. The MRF has operated a robust sampling regime since its opening in 2006 and in May last year piloted the MRF Code of Practice sampling regime in order to ensure compliance with the Code with effect from October 2014. Samples are routinely taken and a monthly report produced for each WCA that informs them of their contamination performance. Data on the improved Code of Practice sampling and end markets will be utilised in the future in identifying the quality of the input and output materials.

What waste is collected, by who and how?

Kerbside collections

28. All WCA's utilise their own Direct Service Organisations (DSO) to carry out kerbside collections. A range of waste containers and vehicles are used to facilitate collections in the most economical way. Only the minimal use of sacks, boxes or bags are considered by each WCA, if there is no other way to reduce the need for manual handling. All WCA's collect wastes using an alternate weekly collection system: providing a residual waste service one week and dry recycling the following week. The dry recycling system captures paper, card, plastic bottles and metal cans commingled and the material is sent for onward sorting at the contract MRF facility in Mansfield.
29. The collection system relies on residents to manage their wastes by:
- Separating out recyclables;
 - Preparing materials for collection (removing lids from bottles, rinsing out bottles and cans);
 - Storing materials for collection;
 - Placing out correct container(s) on collection days.
30. The Commingled scheme adopted by all WCA's has the common characteristics of an effective and economical collection scheme in so far that there is:
- Convenience for the resident in respect of limited space at household level;
 - Compatibility with best waste management practices from the time of inception;
 - Flexibility to respond to changes: i.e. the inclusion of new material streams.
31. Resource & efficiencies:
- Ability to economically utilise current vehicles to operate an Alternate Weekly Collection (AWC);
 - No requirement to purchase specialist vehicles;
 - Increased flexibility in collection regimes to respond to external factors by utilising standard vehicles;
 - Larger containers can be used to create capacity without the need for multiple containers at properties.

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- Maintain staffing levels commensurate with funding and capital expenditure available at that time;
- Provide a safe means for manual handling of waste;
- Collection rounds that can mirror each other. Same day refuse & recycling collections to aid continuity for residents;
- Increased recycling rates;
- Reduced residual waste Kg's/per household.

32. The separate collection of glass is provided by all WCA's through the provision of bring bank sites and by some WCA's through kerbside glass collections using a box/bag and is collected over a four week collection frequency. Whichever method is used to collect the glass, the collected material is sent directly to re-processors and not through a MRF.

Bring site collections

33. All WCA's offer bring bank site collection systems utilising source segregated collections of a variety of materials in separate collection (purpose built) banks on a number of locations throughout their areas. All WCA's provide glass recycling banks. This material is collected and is sent directly to re-processors and not through a MRF.

Recycling Centre collections

34. The WDA provides 13 Recycling Centres operated by Veolia across the county. All 13 provide separate recycling containers for paper, card, plastic bottles, metal cans and glass. Recycling Centres offer separate collections of the following materials:

- Glass bottles
- Paper and cardboard
- Plastic bottles
- Textiles
- Metals (including steel and aluminium cans)
- WEEE
- Engine oil
- Car batteries
- Cooking oil
- Green waste
- Wood
- Chipboard
- Plasterboard (12 sites at present)
- Paint (4 sites at present)

Additional Waste collection sources

Commercial collections

35. All WCA's except Rushcliffe Borough Council provide a commercial waste collection service where requested for residual wastes. Broxtowe Borough Council, Mansfield District Council and Newark & Sherwood District Council also

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provide a commingled recyclable commercial waste collection also, which captures the input specification used for the household collections of paper, card, plastic bottles and metal cans so that the material can be sent to the MRF for sorting. The other 3 WCA's are currently reviewing their services to establish if they can also offer a commingled commercial waste service, in the interim businesses requesting trade waste collections are signposted to specialist reprocessors or collectors.

Glass commercial collections

36. No WCA currently offers a commercial waste glass collection service, however when requests are made the WCA's may arrange or signpost interested businesses to specialist reprocessors or collectors who collect glass separately, most of the licenced and hospitality trade currently utilise these services.

Street cleaning

37. WCA's deliver street sweepings to the MRF or the feeder network of transfer stations where they are dewatered and the street sweepings are then transferred to the Veolia Ling Hall facility where 85-90% of the material is processed into recycling/reuse material with only the remaining fraction going to landfill.

Fly-tipping

38. Fly tipped material at present mostly goes direct to landfill, with effect from June 2015 it is planned that nearly all this material will go through the transfer station network in order that as much as possible can be diverted for recycling or recovery.

Bulky collections

39. Bulky collection material at present mostly goes direct to landfill, with effect from June 2015 it is planned that nearly all of this material will go through the transfer station network in order that as much as possible can be diverted for recycling or recovery.

Financial Summary

40. In 2006 the WDA entered into a 26 year PFI contract with Veolia worth £850 million at the time which included the construction and operation of an 85,000 tonne per annum MRF. The WDA pays Veolia for the sorting of dry recyclables at the MRF and Veolia take the risk on recyclable sale prices. The WDA does not therefore pay Recycling Credits to the WCA's for the commingled dry recyclables they collect, and any increase in quantity or better quality materials that they may provide would not result in any income payback to the WCA's.

41. Veolia has indicated to the WDA that their national material sales team handle all material sales and they do not believe that separately collected paper/card, cans and plastic bottles would yield better sale prices than what they attain through their MRF separated commingled collection materials currently.

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42. With regard to bring site collections and kerbside glass collections the WDA pays the WCA's a Recycling Credit of £52.20 per tonne.

43. The WCA's annual total net collection cost is approximately £14 million per year.

Composition of Waste

44. Kerbside residual waste analysis was undertaken by Waste Research Limited (WRL) for FCC Environment (FCC) on residual waste entering the Eastcroft Energy Recovery Facility in October 2014. Samples were taken for the 3 southern WCA's that currently deliver waste to the Eastcroft.

45. This analysis is the most recent analysis of kerbside residual waste within the county and although the 4 northerly WCA's are not included this study represents a significant proportion of the County.

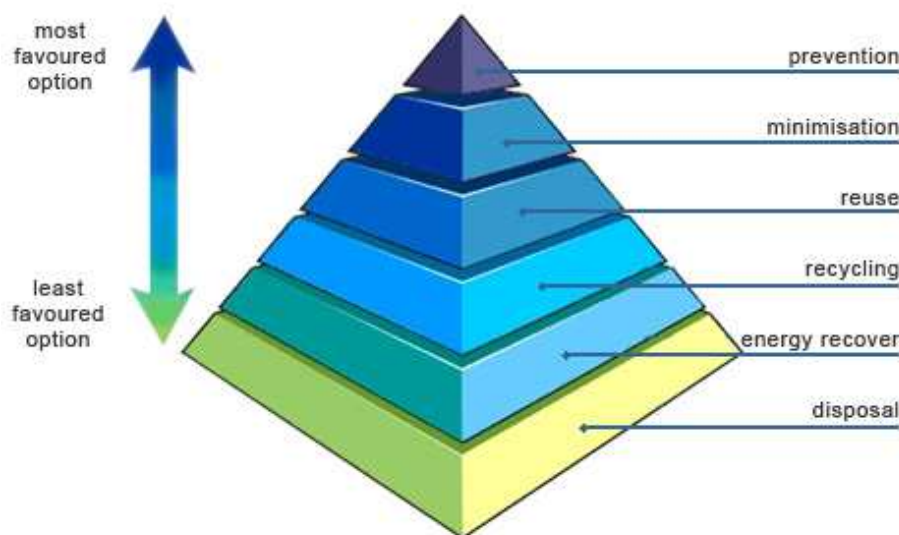
46. The waste was separated into its sub categories and weighed, a summary of the breakdown of which can be seen below.

Category	Borough Council			Average
	Gedling	Broxtowe	Rushcliffe	
Paper & Card targeted in kerbside recycling bins	5.76	6.79	3.20	5.25
Dense Plastic targeted in kerbside recycling bins	0.99	1.41	1.46	1.29
Ferrous Metal targeted in kerbside recycling bins	1.19	0.83	1.26	1.09
Non-Ferrous Metal targeted in kerbside recycling bins	0.42	0.20	0.32	0.31
% of materials targeted in kerbside recycling bins	8.36	9.23	6.24	7.94
Putrescibles	44.07	39.36	40.51	41.31
Miscellaneous Combustables	16.13	15.24	12.61	14.66
Plastic Film	8.57	10.05	10.76	9.79
Paper & Card - contaminated	6.71	7.11	6.30	6.71
Dense Plastic not targeted in kerbside recycling bins	5.51	5.67	6.29	5.82
Glass	3.12	4.35	4.64	4.04
WEEE	1.83	3.83	2.51	2.72
Fines	3.11	2.30	1.63	2.35
Textiles	0.25	0.12	3.36	1.24
Non-Ferrous Metal not targeted in kerbside recycling bins	0.71	0.87	1.98	1.19
Miscellaneous Non-Combustables	0.70	1.00	1.47	1.06
Ferrous Metal not targeted in kerbside recycling bins	0.93	0.85	1.37	1.05
Potentially Hazardous	0.00	0.00	0.34	0.11

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47. The elements that could have been placed in the dry recycling bin are highlighted in the top section of the table and account for an average of 7.94% of materials across the 3 Boroughs.
48. These figures compare favourably with national figures: The EV0801 National compositional estimates for local authority waste collected in England for 2010/11 showed that the average equivalent materials percentage that could have been placed in Nottinghamshire dry recycling bins was 17.44%. It is acknowledged that these figures are a few years out of date but they still represent a significant difference to this latest Nottinghamshire data.
49. In order to address the issue of capture rates and lower the 7.94% figure, the WDA, WCA's and Veolia have produced a new leaflet and bin sticker campaign: 'are you bin smart?' to refresh residents on what can and can't go in the bin, the campaign was distributed to residents during November and December 2015.
50. The key challenge for Nottinghamshire remains around the levels of putrescibles found in the kerbside residual bins (making up an average of 41.31% of the residual waste across the 3 districts) and it is this that the WDA seeks to tackle in the future in order to make a significant difference. Of the remaining material; plastic film and dense plastics will be addressed as new technology and markets arise and the WCA's and WDA will continue to publicise and educate the public with regard to the glass recycling options available.

Applying the Waste Hierarchy



51. The waste hierarchy is divided into six primary headings as follows:

- **Prevention** - means measures taken before a substance, material or product has become waste that reduces:
 - the quantity of waste, including through the re-use of products or the extension of the life span of products;

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- the adverse impacts of the generated waste on the environment and human health; or the content of harmful substances in materials and products.

Re-use - which means any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.

- **Preparing for re-use** - means checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.
- **Recycling** - means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. Includes the reprocessing of organic material but not energy recovery or the reprocessing into materials that are to be used as fuels or for backfilling operations.
- **Energy Recovery** - means any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- **Disposal** - means any operation which is not recovery even where the operation has a secondary consequence, the reclamation of substances or energy.

52. All members of the NWP ensure that they adhere to the waste hierarchy and only divert from it where it is reasonable in the circumstances to do so or where departure will achieve the best overall environmental outcome where this is justified by life-cycle thinking on the overall impacts of the generation and management of the waste. All waste movements are covered by a Waste Transfer Note or Hazardous Waste Consignment Note which confirms that the obligations to apply the waste hierarchy required by Regulation 12 are confirmed.

53. Below are examples of some key waste prevention measures and reuse activities undertaken by the NWP:

- Continuation of the national home composting campaign, providing residents with reduced price **Home Compost Bins** through the national framework to reduce garden and food waste presented for collection. This campaign was originally run separately by each authority but has more recently been combined into a single campaign to ensure consistency of the message;
- Support and engagement with the national **Love Food Hate Waste** program through events and campaigning work;
- **Are you Bin Smart?**; a targeted leaflet delivery campaign to remind residents what to place in the recycling bin;

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- **Easter and Christmas press releases;** to remind residents to not only focus on seasonal activities but also to remember to recycle at this important time of year;
 - **Schools Waste Action Club (SWAC)** which is a county led initiative to promote recycling and waste reduction in all Nottinghamshire schools, including supporting education visits at the MRF;
 - Active promotion of a junk mail campaign including promotion of the **Mail Preference Service**;
 - **Paint Reuse** through the Community Repaint initiative at four of the Recycling Centres. This allows community groups and members of the public to collect donated unwanted paint for free;
 - Promotion of **Furniture and Appliance Reuse Schemes**;
 - Provision of **webpages** which are kept up to date and provide links to access services and include waste reduction tips and recycling advice for key waste streams;
 - A **Real Nappy Scheme** which highlights the benefits of reusable nappies, including the financial savings that can be made during a child's early years.
54. The NWP work closely with a range of organisations to promote best practice and ensure that forthcoming policy and legislative changes promote the best principles of waste management, including the waste hierarchy. We work closely with a range of national organisations such as the **Chartered Institution of Wastes Management (CIWM)**, **Local Authority Recycling Advisory Committee (LARAC)** and the **Waste and Resources Action Programme (WRAP)**.
55. *Therefore we have concluded that the requirements of Regulation 12 are met on an ongoing basis.*

The Necessity Test

Kerbside Collections

56. Due to the lack of reliable national guidance and quantifiable information on MRF (commingled) and transfer station (separate) sampling inputs and outputs and the delays in the UK in introducing the MRF Code of Practice, the WCA's and WDA have taken the view that any analysis may not categorically prove either way that separate collection would facilitate or improve recovery and any evidence would be open to dispute in its assumptions or reliability. In addition we believe that separate collection would result in lower capture rates than our commingled system achieves, however we recognise that this would be difficult to prove. As a result the WCA's and WDA have taken the prudent view that given this uncertainty and until reliable information exists to prove this logic categorically one way or another, for the purpose of this assessment we have assumed that separate collections may meet the Necessity Test and therefore the Practicability Test will be applied.

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Bring site collections

57. Bring sites currently collect the 4 waste streams separately; we have still carried out the Practicability Test in order for compliance and completeness.

Recycling Centre collections

58. Recycling Centres currently collect the 4 waste streams separately, we have still carried out the Practicability Test in order for compliance and completeness.

The TEEP test for kerbside

Technical

59. Kerbside collections of the four material types have been assessed against the Technical Practicability of separate collection. We can find no factors unique to Nottinghamshire or areas within it that would not make it technically practical to collect the 4 streams separately.

60. During the assessment, factors such as high density housing, health and safety concerns for collection operatives, nuisance and increases in fly-tipping and litter were all highlighted as problems which would impact on the ability to collect the 4 streams separately, and would be difficult to introduce both on a practical and political level, however none of these factors were deemed to be unsurmountable.

61. ***Therefore we have concluded that separate collection at kerbside is technically practicable at the present time.***

Environmental

62. Kerbside collections of the four material types have been considered against the Environmental Practicability of separate collection.

63. Two elements were considered when assessing the environmental impact of the WCA's current waste and recycling collection system:

- Waste arisings were converted into a carbon equivalent using the Scottish Carbon Metric calculator;
- Carbon outputs from fuel usage from the current system of commingled recycling collection rounds in Nottinghamshire have been calculated as a baseline.

64. This analysis has resulted in a baseline saving of 35,238 tonnes of CO₂ equivalent, in providing the current kerbside commingled collection supported by kerbside glass collections using 2013/14 data.

65. Any change in collection system from the current to a separate system would require extra vehicles, staffing, rounds, containers, fuel and increased trips to the delivery points, however some of these increases could possibly be offset by

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reductions in the numbers of staff, sorting machinery and energy costs at the MRF, however we believe the net effect of this change would still be detrimental.

66. *Therefore we have concluded that separate collection at kerbside is probably not environmentally practicable at the present time.*

Economic

67. Kerbside collections of the four material types have been assessed against the economic practicability of separate collection. As mentioned earlier, the current commingled AWC collection system has been in place since before the 26 year PFI contract was awarded in 2006. Approximately £16 million was spent on the construction and provision of sorting equipment for the MRF and the current Net Book Value of the facility is around £10 million. The methodology and system chosen to deliver quality recyclables over the life of the contract has always been a commingled collection system with the sorting into high quality materials being achieved through a quality contract MRF.

68. As highlighted previously changes in the collection methodology provides no income to the WCA's, therefore only costs are incurred to them through the implementation of separate collections.

69. From a WCA cost perspective, separate collections would require additional containers, new additional and replacement vehicles, more fuel, more staff and communication costs in publicising the new system. As an example the one off capital costs of providing an additional recycling box to each household in the county would equate to around £1.5 million and 2 extra recycling vehicles per WCA would equate to a combined total cost of another £2 million bringing the combined total cost to £3.5 million, this is before the extra ongoing costs of fuel, insurance, extra labour etc are included.

70. From a WDA perspective, any change to a source separated collection regime for the materials currently collected co-mingled would require the County Council to use the Waste PFI Contract "Authority Change Procedure" to ensure the service provided by Veolia continued to meet the requirements of the parties. Under this procedure Veolia would propose an alternative solution to the Council for the management of this source separated material and the WDA would be required to either meet the new operational cost and any ongoing liabilities including loss of profits in order to ensure the Contractor was put in a no better/no worse situation, or in a worst case scenario terminate the existing contract on a voluntary basis in order to procure new arrangements. The costs of a voluntary termination would be unaffordable to the County Council and therefore the only acceptable scenario would be that a revised contract would be agreed.

71. It is likely in this situation that the Mansfield MRF would become obsolete (as potential purchasers would also be subject to the TEEP assessment) and in all probability would have to have the sorting equipment removed and be retrofitted to operate as a transfer station, or be sold off if possible at a potential major loss and replaced with a new transfer station where source separated material could be bulked up before being sent on for reprocessing.

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72. This would lead to significant one off capital costs in respect of the changes to the contract infrastructure including upgrading of the transfer station network, and decommissioning of the existing MRF plant which is estimated at around £4m alone. The County Council will also have to meet the potential ongoing revenue costs of the new service, together with the historic liabilities associated with the construction and financing of the now redundant facilities by the contractor since 2006, which were due to be recovered through the life of the contract.

73. On this basis moving to a source separated collection regime for Nottinghamshire would be unaffordable to the County Council and would not therefore be economically practicable.

74. Therefore we have concluded that separate collection at kerbside is not economically practicable at the present time.

Conclusion for kerbside collection

	Present System	Kerbside System	Sort
Necessity Test			
Satisfies Waste Hierarchy?	Yes	Yes	
Improves/Maintains Material Quantity?	Yes	Unknown	
Improves/Maintains Material Quality?	Unknown	Unknown	
Practicability Test			
Technically Practicable	Yes	Yes	
Environmentally Practicable	Yes	No	
Economically Practicable	Yes	No	

75. On the basis that our assessment has identified that;

- Technically separate kerbside collection IS practicable,
- Environmentally separate kerbside collection may NOT be practicable
- Economically separate collection is NOT practicable

76. The intention of the NWP and its constituent WCA and WDA will be to continue the commingled dry recyclable collection of the current targeted material streams of paper, card, plastic bottles and metal cans and the separate collection of glass alone either from kerbside or through bring site provision.

The TEEP test for bring sites

Technical

77. Bring sites collect the 4 material types separately at present therefore it is Technically Practical to collect the 4 streams separately.

78. *Therefore we have concluded that separate collection at bring sites is technically practicable at the present time.*

Environmental

79. Bring sites collect the 4 material types separately at present, therefore it we believe it is Environmentally Practical to collect the 4 streams separately.

80. *Therefore we have concluded that separate collection at bring sites is environmentally practicable at the present time.*

Economic

81. Bring sites collect the 4 material types separately at present, therefore it we believe it is Economically Practical to collect the 4 streams separately.

82. *Therefore we have concluded that separate collection at kerbside is economically practicable at the present time.*

Conclusion for bring sites

83. On the basis that our assessment has identified that;

- Technically separate bring site collection IS practicable
- Environmentally separate bring site collection IS practicable
- Economically separate bring site collection IS practicable

84. The intention of the WCA's will be to continue to offer separate bring banks for the material streams where required in order to support the commingled dry recyclable collection of the current targeted material streams of paper, card, plastic bottles and metal cans and the separate collection of glass either from kerbside or through bring site provision.

The TEEP test for Recycling Centres

Technical

85. Recycling Centres collect the 4 material types separately at present therefore it is Technically Practical to collect the 4 streams separately.

86. *Therefore we have concluded that separate collection at Recycling Centres is Technically Practicable at the present time.*

Environmental

87. Recycling Centres collect the 4 material types separately at present, therefore we believe it is Environmentally Practical to collect the 4 streams separately.

88. *Therefore we have concluded that separate collection at Recycling Centres is environmentally practicable at the present time.*

Economic

89. Recycling Centres collect the 4 material types separately at present, therefore we believe it is Economically Practical to collect the 4 streams separately.

90. *Therefore we have concluded that separate collection at Recycling Centres is economically practicable at the present time.*

Conclusion for Recycling Centres

91. On the basis that our assessment has identified that;

- Technically separate Recycling Centre collection IS practicable
- Environmentally separate Recycling Centre collection IS practicable
- Economically separate Recycling Centre collection IS practicable

92. The intention of the WDA will be to continue to offer separate bring banks for the material streams at Recycling Centres.

Review Process

93. Should there be any substantial changes to the following factors, it may be necessary to review this assessment:

- Availability of accessible facilities;
- Changes in technology;
- Changes to vehicle/staff costs;
- Fundamental changes to WCA collection arrangements/contracts;
- Fundamental changes to WDA contracts;
- Legislative changes.

94. It is the intention of the NWP that this assessment will be reviewed annually to assess if any factors change any of the assumptions made, and that the NWP formally agree its validity each year.

Agreed approach and sign off

95. Each WCA will need to take their own view on the applicability of this assessment, tailor this document as necessary to fit their own requirements and individual sign-off requirements within their Council Scheme of Delegation.