

Response to Defra draft paper: Managing Household Waste and Recycling Centres (HWRCs) during the Coronavirus pandemic.



From: BCP Council

Date: 19 April 2020

This paper sets out BCP Council's initial response to the draft Defra paper circulated on Friday 17 April 2020.

Background information: HWRC's were closed at the start of the lockdown period as travelling to dispose of waste was considered not to be an essential journey given that we are providing a household refuse collection service which removes food (weekly), dry recyclables and all residual waste at least once per fortnight. This was in line with the advice coming from government at the time and has been supported by the Police who would not support travelling to a tip to be one of the allowable reasons to leave your home as defined by government.

In addition, we suffered a loss of drivers from our kerbside collection services and other waste disposal services due to sickness and self-isolation and it has also been necessary to supplement the staffing of our kerbside services to maintain social distancing measures. This combination would have prevented the Council from being able to properly maintain order at the sites and the extensive queues that would inevitably build up.

Commercial skip contractors are still operating and are providing a competitive market for large-scale waste disposal.

Our local management information does not show any increase in local fly-tipping events, in fact a slight reduction in reported incidents, possibly associated with the slow-down in the small building industry and household improvements.

It is important that the current situation is put into the correct context as the Defra paper implies that it has been a unilateral decision of local authorities to shut their HWRC's and does not put the correct context around it.

Social distancing and queuing systems:

Most HWRC's would be capable of operating with social distancing rules in place, but that would require a new approach to queue management as many sites are within close vicinity of main roads and traffic queues will back-up quickly at peak times. The queue movement speed is also likely to be slow which will add to local frustrations and short-temper being demonstrated in queuing motorists and at arrival to the site.

It would be possible to operate HWRC's with a local rationing system, based on alphabetic names, car number plates etc but in practice these are not in place locally and would cause confusion and are likely to lead to error and frustration. Most HWRC's do not have easy access to rationing technology or systems and most have very basic queue management

operating systems in place, so implementing a new system will require training and additional staff in place.

Defra suggests removing the need to prove identity, but that is a well-known process that has restricted demand between local authorities. Opening the HWRC's without such a system will require all HWRC's in an area to be open, simultaneously across all local authorities and will require some dampening of the effect on waste disposal budgets.

Defra proposals to limit use of HWRC's:

The advice that use of the HWRC's should be restricted to those who cannot store their waste safely at their home is simply unenforceable and unreasonable. This is totally impracticable and will result in a total disregard for the rules, further undermining the concepts of social distancing and self-isolation.

If we are going to re-open HWRC's it needs to be a national decision, taken in parallel between MHCLG, Defra and the Home Office so that local authorities and the Police are seen to be acting in concert. This should, in our view, only be done in the context of it being an early stage in removing the lockdown arrangements and reducing the impact of the lockdown on services and communities. All local authorities should be encouraged to re-open their HWRC's on a common, pre-determined, and well communicated date to improve national communication and prevent cross-border traffic in waste.

As stated above, local authorities should re-open the full facilities at the same time, but sufficient planning time is required as differing local arrangements are in place for site operations which may be through contractors or in-house plus varying waste removal arrangements. Sufficient planning time should also help ensure off-take contractors being available to take the waste from the site, but this cannot be guaranteed from the outset. In the event that some waste streams cannot temporarily be accommodated, adequate planning time will also ensure effective communications and local publicity via the local authorities' website and the local press.

BCP Council

Contact: Personal Information, Chief Executive

Personal Information

[Redacted]



Ministry of Housing,
Communities &
Local Government

Simon Clarke MP

Minister for Regional Growth and Local Government
**Ministry of Housing, Communities and Local
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Department
for Environment
Food & Rural Affairs

Rebecca Pow MP

Minister for the Environment
**Department for Environment, Food and Rural
Affairs**
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All Local Authority Leaders and
Chief Executives in England

5 May 2020

Dear Colleague,

Waste services including household waste and recycling centres

Thank you once again for what you are doing in these difficult times. We know that you are working incredibly hard to balance the need to maintain services and keep your workers safe alongside your wider responsibilities for the health and wellbeing of your residents.

We recognise councils are working tirelessly to keep rubbish and recycling collections open during this national emergency, while bin crews are also playing a vital role in keeping the country going.

We know that councils have had to make difficult operational decisions based on their local needs and priorities, including deploying staff to maintain key kerbside collections. However, we welcome more recent news that some councils are now re-opening household waste recycling centres that have been closed. We urge others to follow suit where it is safe to do so while managing social distancing requirements in the most practicable way.

We would like to reassure you that waste and recycling centres are permitted by law to be open. It is reasonable for people to leave home to take their bulk rubbish to those centres where the material cannot be stored safely at home or disposed of through other legitimate routes.

We have also been working closely with the Minister for Crime and Policing, Kit Malthouse MP, and the chair of the National Police Chiefs' Council, Martin Hewitt, to ensure that re-opening these facilities can be managed by local authorities without diverting police resources.

Household waste recycling centres play an essential role to the economy by providing the recycled materials that industry relies on to make new products as well as helping householders dispose of their waste and reducing the risk of fly-tipping.

Defra has now published additional official guidance to support you in maintaining access to these key facilities and, where necessary, with managing the process of re-opening. A link to the guidance can be found [here](#).

Thank you for maintaining these critical public services on which our communities and residents rely.

Personal Information

SIMON CLARKE MP
Local Government Minister

REBECCA POW MP
Environment Minister

Managing Household Waste and Recycling Centres (HWRCs) during the Coronavirus pandemic.

HWRCs are not one of the businesses listed in the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 that are required to close. Provided that health and safety and social distancing requirements can be met they can stay open. The legal duty under s.51 (1)(b) of the Environmental Protection Act 1990 on councils to provide at all reasonable times a place for residents of the local authority to dispose of their household waste for free is still a statutory requirement for local authorities.

We recognise that during the Coronavirus pandemic some local authorities may be finding it difficult to maintain waste collection services. This guidance is to help local authorities reopen or to keep open household waste recycling centres (HWRCs). It should be read in conjunction with guidance already available to local authorities from the Health and Safety Executive (<https://www.hse.gov.uk/waste/collection.htm>) and the Waste and Resources Action Programme (https://www.wrap.org.uk/sites/files/wrap/HWRC_Guidance_2018_4.pdf) on the operation of civic amenity sites, HWRCs and waste management more broadly and the Waste Industry Health and Safety Forum ¹ (<https://wishforum.org.uk/wp-content/uploads/2017/02/WASTE-26-.pdf>)

There is also guidance available on how to manage social distancing. The key principle of this guidance **is that human health must be protected, and social distancing must be observed at all times at HWRCs by both staff and visitors.**

Please regularly check gov.uk for the latest advice on the Coronavirus.

Social distancing

- Refer to the range of government guidance on Coronavirus such as <https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19>
- You may also find the Waste Industry Safety and Health Forum (WISH) guidance helpful. <https://wishforum.org.uk/wp-content/uploads/2020/04/WISH-INFO-13-COVID19-and-waste-management-activities-issue-2-15-April-2020-Updated.pdf>
- Carry out a risk assessment to consider if there are any circumstances where it's difficult for staff and/or visitors to be less than 2 metres apart while at an HWRC. If so, what modifications must be made to ensure social distancing can always be observed?
- Can numbers of visitors to the HWRCs can be limited at any one time? Would this cause problems such as the piling up of vehicles along busy roads? Could your staff help with allowing entry of vehicles into the

¹ WISH also provide guidance on bring sites which might also be helpful <https://wishforum.org.uk/wp-content/uploads/2017/02/WASTE-11.pdf>

HWRCs? What systems do you already have in place to manage queues?

- What plans do you normally deploy for busier periods of the year (such as bank holidays)? How can they be adapted in light of Covid 19 restrictions?
- Which are your busiest days/times of the week? Could you encourage householders to come on days or times that are less busy?
- Consider reducing the number of days that the HWRCs are open
- Consider reducing/changing the opening hours.
- Could residents have access to webcam footage so that they can see how long the queue at an HWRC before setting out?
- Do staff have access to appropriate PPE needed to operate the HWRC? Refer to the government's guidance on PPE <https://www.gov.uk/government/publications/wuhan-novel-coronavirus-infection-prevention-and-control/covid-19-personal-protective-equipment-ppe>
- Consider if you can dispense with the need for visitors to show ID on arrival at HWRC sites if it will help with social distancing.
- Make sure that you discuss your plans for keeping HWRCs open, including managing the queues of vehicles waiting to enter the HWRCs, with the local police. Discuss with local police how having managed open sites could help to reduce other impacts such as flytipping. Discuss with police what might constitute an 'essential' journey to an HWRC. This is one where a resident needs to get rid of waste that might otherwise cause a risk of injury, illness or harm if stored on the householder's property.
- Could alternative services, such as a free pre-booked collection service, be provided to provide residents with an outlet for wastes they would typically take to the HWRC?

Communications to residents

- Make sure websites, social media channels and texts/apps to residents have up to date information on the HWRCs including opening hours and materials accepted for recycling
- Consider putting notices in local newspapers and other publications that residents read
- Make sure posters and signage at HWRCs are up to date.

Here are some messages that you might wish to include in communications to residents:

- They should refrain from doing any **unnecessary** DIY or tasks that could lead to a visit to an HWRC until the service is running normally again as, not only would this put a strain on an already stretched service but goes against the rules on only undertaking journeys that are strictly necessary.
- journeys to HWRCs must only be undertaken if their waste and recycling cannot be stored at homes **without causing risk of injury, health or harm**. No other reason for the journey would be considered

necessary. If residents can temporarily store their recycling in a way that doesn't pose a risk to their health they must do so.

- visitors to HWRCs must always observe social distancing. If residents do not comply with social distancing guidance they will be asked to leave the HWRC and the HWRC may have to close temporarily.
- HWRC staff will not be able to assist with carrying items if it breaches social distancing guidelines
- If an LA is still providing garden waste collections residents should use this service instead of taking their garden waste to an HWRC.
- If an LA is collecting bulky waste during the Coronavirus pandemic if residents can afford to do so they should use this or a private waste operator to take away the bulky waste rather than take it to the HWRC. Private contractors should be registered as waste carriers with the Environment Agency.
- Include details of waste collection times and frequencies
- Fly-tipping is a crime. Those who leave items on pavements, in fields and forests and other places will be prosecuted. Leaving items outside charity shops is also flytipping. Burning household waste is also an offence.
- Recycle now has some good advice for residents on recycling during the Coronavirus pandemic which you could mention
<https://www.recyclenow.com/news/2020-03-27-waste-recycling-collections-covid-19>
- If new electrical or white goods need to be purchased, consider purchasing them from a company that will take away your old white goods for recycling. If residents can temporarily store their old electrical or white goods in a way that doesn't pose a risk to human health they must do so.

Other considerations/preparations/staffing

- Have you temporarily dropped garden waste/bulky waste collections or any other waste services? What alternative services are there for collecting these types of waste?
- Can the HWRCs be adequately staffed? Have HWRC staff been redeployed to other services? Could HWRC staff who have been deployed onto other services be redeployed or shared with HWRCs where feasible?
- Could the HWRCs operate with minimal staffing or with less staffing than usual?
- Do you think that residents are likely to complain if, on arrival, the HWRC service wasn't being provided or they had to queue for a while? If so, how could you mitigate this?
- Do you need to increase the amount of cleaning at HWRCs, especially at the staff facilities?

Materials accepted

- Are reprocessors/disposers able to collect and dispose of all materials –is there still a throughput of material. If not, does the HWRC have

enough space to store materials? Could processors make arrangements to take the waste and store it at their site until there is sufficient material to reopen their facility?

- Local Authorities should continue to work collaboratively with their services providers to ensure waste can be stored and removed from sites safely, and later treated in an environmentally sound manner.”
- Could you provide an adequate service if you reduced the types of materials were accepted?
- Do you think residents would complain if you reduced the amount of materials accepted?
- Could you see an increase in flytipping if you reduced your HWRC service & the types materials of accepted?
- Do you accept C & I waste at your HWRCs? Could you continue to do this?

Managing Household Waste and Recycling Centres (HWRCs) during the Coronavirus pandemic.

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From: Anthony May
Sent: 11 May 2020 09:35
To: Councillor Alan Rhodes; Councillor Andrew Brown; Councillor Andy Sissons; Councillor Andy Wetton; Councillor Ben Bradley; Councillor Boyd Elliott; Councillor Bruce Laughton; Councillor Christopher Barnfather; Councillor David Martin; Councillor Diana Meale; Councillor Eric Kerry; Councillor Errol Henry; Councillor Francis Purdue-Horan; Councillor Glynn Gilfoyle; Councillor Gordon Wheeler; Councillor Helen-Ann Smith; Councillor Jason Zadrozny; Councillor Jim Creamer; Councillor John Clarke; Councillor John Cottee; Councillor John Doddy; Councillor John Handley; Councillor John Knight; Councillor John Longdon; Councillor John Ogle; Councillor John Peck; Councillor Jonathan Wheeler; Councillor Joyce Bosnjak; Councillor Kate Foale; Councillor Kay Cutts MBE; Councillor Keith Girling; Councillor Keith Walker; Councillor Kevin Greaves; Councillor Kevin Rostance; Councillor Liz Plant; Councillor Martin Wright; Councillor Maureen Dobson; Councillor Michael Payne; Councillor Mike Pringle; Councillor Mike Quigley; Councillor Muriel Weisz; Councillor Neil Clarke; Councillor Nicki Brooks; Councillor Parry Tsimbiridis; Councillor Paul Henshaw; Councillor Pauline Allan; Councillor Phil Rostance; Councillor Philip Owen; Councillor Rachel Madden; Councillor Reg Adair; Councillor Richard Butler; Councillor Richard Jackson; Councillor Roger Jackson; Councillor Samantha Deakin; Councillor Sheila Place; Councillor Stephen Garner; Councillor Steve Carr; Councillor Steve Vickers; Councillor Stuart Wallace; Councillor Sue Saddington; Councillor Sybil Fielding; Councillor Tom Hollis; Councillor Tony Harper; Councillor Tracey Taylor; Councillor Vaughan Hopewell; Councillor Yvonne Woodhead
Cc: Derek Highton; Mick Allen
Subject: Household Waste Recycling Centres (HWRC)

Dear Councillor

As you are aware we took the decision to close all Household Waste Recycling Centres (HWRC) in Nottinghamshire on 24 March 2020 following government advice on making only essential journeys.

I am writing to update you on the details of the first phase of the reopening process which takes into account the new Government guidance, issued on 5 May 2020, confirming sites are to reopen for essential use only and where “**waste cannot be stored without causing risk of injury, health or harm**”.

We have been working closely with our waste contractor, Veolia, to ensure that we can open sites in a safe and controlled way, and therefore the following six sites will be reopened from 10am on Monday 18 May.

- Beeston
- Bilsthorpe
- Calverton
- Hucknall
- Newark
- Worksop

The first six sites will be open 7 days a week on reduced opening times of 10am – 6pm, with the exception of Newark which will be open from 10am-4pm.

Residents will be able to deposit a reduced range of waste materials including garden waste, wood, metals, electrical and electronic goods and general waste, but due to the social distancing rules members of staff on site will not be able to help residents unload their waste.

The sites will be working on a 'one in one out' basis and to maximise throughput of vehicles, trailers and vans will not be permitted during this initial phase, and although traffic management plans will also be in place for each of the sites to help manage queues on the highway network, experience elsewhere in the Country suggest there will be significant queues and delays at all sites.

The phase one sites provide a balance of strategic location to provide coverage across the County, on-site space to allow social distancing, and the ability to provide off-site queueing without impacting significantly on the strategic highway network, and therefore deliver the best possible service within the current available resources.

The other six sites in the County at Giltbrook, Kirkby in Ashfield, Mansfield, Retford, Warsop and West Bridgford are all significantly constrained by one or more of site size, location on the highway network, and proximity to other waste facilities, businesses or housing. These sites cannot therefore be prioritised for reopening at this time, however as part of the long-term planning for a return to normal operation we are working on a further phase of additional site openings which will be subject to changes to government guidance, and the public response to complying with the new operating model.

We are also working closely with our districts and borough colleagues and neighbouring authorities to ensure messages are communicated clearly to residents, and we have aligned the reopening of our HWRC services and the restarting of kerbside bulky waste collections where possible.

We developed a list of Frequently Asked Questions which are available on the County Council website using the link below, which we hope will answer any queries from yourselves, our partners and residents

<https://www.nottinghamshire.gov.uk/waste-and-recycling/recycling-centres/reopening-faqs>

Kind Regards

Anthony.

Anthony May

Chief Executive
Nottinghamshire County Council
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Nottingham NG2 7QP

Personal
Information

Blog: <http://www.nottinghamshire.gov.uk/leadership>

Personal Information

From: [Redacted] Personal Information @local.gov.uk>
Sent: 21 April 2020 07:29
Cc: [Redacted] Personal Information CCN
Subject: HWRC - CCN Letter to Ministers
Attachments: CCN Letter - Reopening HWRCs - Implications for government COVID-19 Policy FINAL.pdf

Dear CCN Leaders

Over recent days and weeks we have been engaging our members on the matter of reopening Household Waste & Recycling Centres (HWRCs) following initial guidance published by the Department for Environment, Food & Rural Affairs (DEFRA).

A wide range of concerns with the suggestion they should be reopened have been raised. On our leaders call on Friday views were mixed. While all recognised the significant challenges reopening HWRCs presented, and it was widely felt that that this should take place following the ending of the lockdown, some suggested they would proceed to open sooner in order to support the emerging government position.

At the weekend further draft guidance was circulated, with our member councils providing feedback to DEFRA during the course of yesterday. We would like to thank councils for sharing their responses with CCN, highlighting significant challenges and barriers.

Based on this feedback, and balancing the views of member councils, it is clear that the most fundamental challenge to reopening HWRCs is the matter of what constitutes an essential journey under Regulation 6 of the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020.

CCN has therefore written the attached letter to Ministers. Without government taking steps to resolve the conflict between these regulations and the suggested approach to HWRCs, it argues that the majority of councils will not be able to reopen centres. The letter also outlines that if the government were to make travel to HWRCs an essential journey, they would need to communicate this nationally and ensure councils were provided with the necessary support by the police. We also highlight the potential negative impact on the government's core 'stay at home' message if they seek to ask councils to reopen during the lockdown, alongside our wider concerns and challenges.

We are clear that if the government is determined to push forward plans to support local authorities to reopen facilities, we would work with government to ensure this can be done in the safest way possible.

Kind regards,

[Redacted] Personal Information | **Head of Policy & Communications** | CCN | 18 Smith Square | Westminster | London | [Redacted] Personal Information
SWIP3HZ | [Redacted] Personal Information
www.countycouncilsnetwork.org.uk | http://twitter.com/james_maker



