



Separate Collection Requirements: Frequently Asked Questions

General

What are the 'separate collection' requirements for waste?

Under the requirements, waste collectors or carriers including private companies, social enterprises and Local Authorities will need to provide their customers with separate collections for the four 'specified materials'. This means sorting the waste streams included in the requirements by type into separate containers for collection. This applies to wastes from all sources, industry (including construction and demolition), commerce (including retail, hospitality and offices) and households.

It is for the waste carrier or collector who wishes to collect any of the four materials together in a co-mingled collection to demonstrate that it has carried out an assessment. This should demonstrate whether the recyclable materials that it collects and the outputs from the ensuing sorting process are of the required quality for the receiving reprocessing industries and that it is not technically, environmentally and economically practicable for it to collect waste paper, glass, plastics and metals separately (the assessment should be based on the "Necessity/TEEP Test").

What materials are included under the new Regulations?

The specified materials are metal, plastic, glass and paper however, for some sub-categories of these materials (e.g. Pyrex glass) there are no recycling options available at the moment. In such cases, producers are not expected to segregate these materials from residual waste.

Why have these requirements been introduced?

Fully segregating (separating) waste is the best way to promote high quality recycling because it ensures that the recyclable materials do not contaminate one another. They will help ensure that the value of anything we use and throw away is preserved and, wherever possible, it can be captured and used again in our economy. This will also help Wales reach its targets for recycling 70% of our waste and for the construction industry 90% recycling with disposal of waste by landfilling or incineration/energy from waste only 30% by 2025.

Is there a de-minimis (i.e. a minimal amount below which you do not need to comply)?

No. If you collect waste then you need to ensure that you offer a separate collection service for these materials.

Is plastic film included in the separate collection requirements?

It is a form of plastic, so it would be included in the separate collection requirements. The waste carrier would need to consider whether it is Technically, Environmentally or Economically Practicable to collect (see information on the 'Necessity/TEEP test' later in this document).

Who will enforce the requirements?

Natural Resources Wales is the enforcement body for these regulations.

Waste Producer

What is a waste producer?

Any person whose activities produce waste (original waste producer) or anyone who carries out pre-processing, mixing or other operations which result in a change in the nature or composition of this waste.

What is the responsibility on the producer?

As a producer of waste you have a "legal duty" to take all reasonable steps to apply the 'waste hierarchy', please see the "*Guidance on the waste hierarchy*" produced by Welsh Government.

http://gov.wales/topics/environmentcountryside/epq/waste_recycling/publication/hierarchyguide/?lang=en

Is there anything that would prevent businesses from sharing the waste storage needs?

Sharing waste services can lead to reduced waste management costs and reduce storage space needed on premises. But the legal requirements of Duty of Care still need to be complied with.

As a small business I frequently carry my wastes to the local authority civic amenity site which accepts trade waste in my white van or flatbed truck and I sort the materials into the different skips provided, would that comply?

This could comply provided that during transport the materials did not get contaminated with non-recyclable waste.

My landlord takes care of my waste arrangements. Am I affected?

Yes, you will be affected. If you rent a serviced office or a property run by a commercial property manager, your landlord should let you know about any changes you need to make concerning your waste collection.

Role of Facilities Management Company?

The FM Company may organise waste management services for the whole property. Adequate arrangements are required for storage, authorised transfer and management of materials to comply with Duty of Care and separate collection responsibilities.

Where will I find room to store the extra bins that I now require for recycling?

Your business will not be producing more waste, rather you will be organising it – segregating key recyclable materials. You should speak to your waste management company about space-efficient solutions.

Waste Carrier

Will this affect local authority Trade Waste Collections?

Yes, the regulations apply to all waste sources including municipal, commercial, industrial, construction and demolition.

If I collect dry recyclables in a split RCV with the other compartment for residual wastes would that comply?

This could comply, provided that materials collected are segregated appropriately and during transport the materials did not get contaminated with non-recyclable waste.

What happens if a waste producer I collect from refuses to sort out the four recyclable materials into the separate bin/s I have provided?

You should remind them that as a waste producer they need to sort out these wastes in order to comply with the waste hierarchy requirements under their duty of care. Producers of waste must also ensure that any waste destined for disposal at landfill must be pre-treated – segregating these materials from the residual waste at source would be a means of pre-treatment.

How do I do a Necessity/TEEP assessment?

You should refer to the Welsh Government 'Guidance on the Separate Collection of Waste Paper, Metal, Plastic and Glass' to put together your assessment -

http://gov.wales/topics/environmentcountryside/epq/waste_recycling/publication/guidance-on-the-separate-collection-of-waste-paper-metal-plastic-and-glass/?lang=en

Guidance on an appropriate methodology to demonstrate the assessment is available within the 'WRAP roadmap', which although produced for English local authorities, does provide a suitable methodology that could be followed in Wales

<http://www.wrap.org.uk/content/requirements-waste-regulations>

Do I need to submit my TEEP assessment to NRW for approval?

No, but we would expect you to retain the evidence from that assessment, we may need to see that documentary evidence. Where you do not collect the four materials separately i.e. a comingled collection, we may ask how you have applied the practicability and necessity tests.

Waste Facility Operator

Are 'bring sites' covered by these regulations?

Yes, if the four waste materials are collected at these sites

What should I do when a waste carrier brings unsegregated wastes to my facility?

Please highlight the legal requirements for separate collections to your customers. The duty is on the waste carrier to ensure that the four materials (glass, metal, plastic and paper) are collected separately and as a waste facility operator, the duty is on you not to mix separately collected materials with materials that were not separately collected.