

## Waste consultation

### Pledge 1

***All Councils within the Partnership will review their purchasing activities and internal waste management services to seek to promote waste prevention, reuse and recycling to support the objectives of this Strategy and lead by example.***

A reduction of waste should be embedded in councils as part of their Climate Emergency Action plans. All service offerings should be designed to produce only unavoidable waste.

Service reporting metrics (or KPIs, Key Performance Indicators) should include standardised figures on waste to landfill and incineration and again ultimately, the disposal of the toxic ash. Also figures from the supply chain such as the grade the recyclates were classified at and the reject rates that are then diverted to either incineration or further sortation.

### Pledge 2

***The Partnership pledge to support and encourage waste prevention activity across Leicestershire. This will include working with stakeholders, residents and communities to prevent unnecessary waste arising, for example through food waste reduction campaigns such as Love Food Hate Waste.***

If a new recycling scheme is introduced across the partnership, then education should be a key theme. Pick up the lid of any recycling bin put out on the street for collection and you will see a variety of horrors that makes you wonder how any useful recyclates are collected.

We need wardens making random inspections of bins and the households with severely contaminated bins being given one-2-one education on how to use the service, along with the ultimate sanction of fines being applied to repeat offenders.

### Pledge 3

***The Partnership pledge to continue delivering reuse services and expand activities where practicable, working in partnership with other stakeholders and to signpost to places that advocate for waste prevention and reuse, in support of developing a circular economy. This includes a pledge to continue to improve the collection of items for reuse at HWRCs and explore the development of re-use shops at suitable sites.***

Re-use shops are a great idea, however not all settlements have the same needs. For example in Market Harborough it is very hard to sell, even give away good condition items where if these were fed into a network of re-use shops then the communities that need these items most could benefit the more.

Repair shops should be included at these sites, these could be co-operated by community groups/charities such as the fixer network. More money could be provided to expand the fixer network.

### Pledge 4

***The Partnership will implement and promote separate food waste collections to all households, subject to confirmation of Government policy, legislation and the provision of funding. This will be as soon as required and when contracts and circumstances dictate. The County Council will procure***

**Anaerobic Digestion capacity to treat the collected food waste in a manner that contributes to effective carbon emissions reduction across the county and improves soil quality.**

We completely agree that this is an appropriate way to treat this waste stream. The council could consider owning this capacity in order to benefit from the sale/use of the biogas produced.

Pledge 5





**The Partnership will explore the use of alternative fuels for collection vehicles and the transportation of waste and resources to further reduce carbon emissions of the service and improve air quality.**

The move to alternative fuels is to be welcomed but all fuels are not as equally Green.

Electricity still has a carbon footprint as the network is not fully de-carbonised and even if you are on a “Green” tariff the chances are that the RGOs have been resold and some of them will be for energy that has already been consumed. There are only a few completely Green tariffs.

Rather than completely zero carbon, maybe a biomethane approach can be used with the fleet fuelled by the outputs of the Anaerobic digestion treatment of the household food waste, so near enough carbon neutral and potentially a revenue positive scheme.

Hydrogen also comes in three forms, Green, Blue and Grey each with a higher environmental footprint.

Color	GREY HYDROGEN	BLUE HYDROGEN	TURQUOISE HYDROGEN*	GREEN HYDROGEN
Process	SMR or gasification	SMR or gasification with carbon capture (85-95%)	Pyrolysis	Electrolysis
Source	Methane or coal 	Methane or coal 	Methane 	Renewable electricity 

Note: SMR = steam methane reforming.  
\* Turquoise hydrogen is an emerging decarbonisation option.

Rather than buying new, some councils have retrofitted their old collection vehicles to Hydrogen or to EVs bringing in the second, R – Reuse, and saving the embodied carbon of a new truck.

<https://www.geesinknorba.com/> Hydrogen fuel cell

<https://chargedevs.com/newswire/dennis-eagles-new-electric-refuse-trucks-hit-the-streets-earn-rave-reviews/> Electric Refuse vehicle

This should not be restricted to collection and transportation, there is the handling machinery at the various points in the system (Forklift trucks, telehandlers etc.,) and this Net Zero ambition should be

embedded in all service contracts. All emissions should be monitored as part of your standard reporting structure as there are many omissions at the moment, as this graphic illustrates.

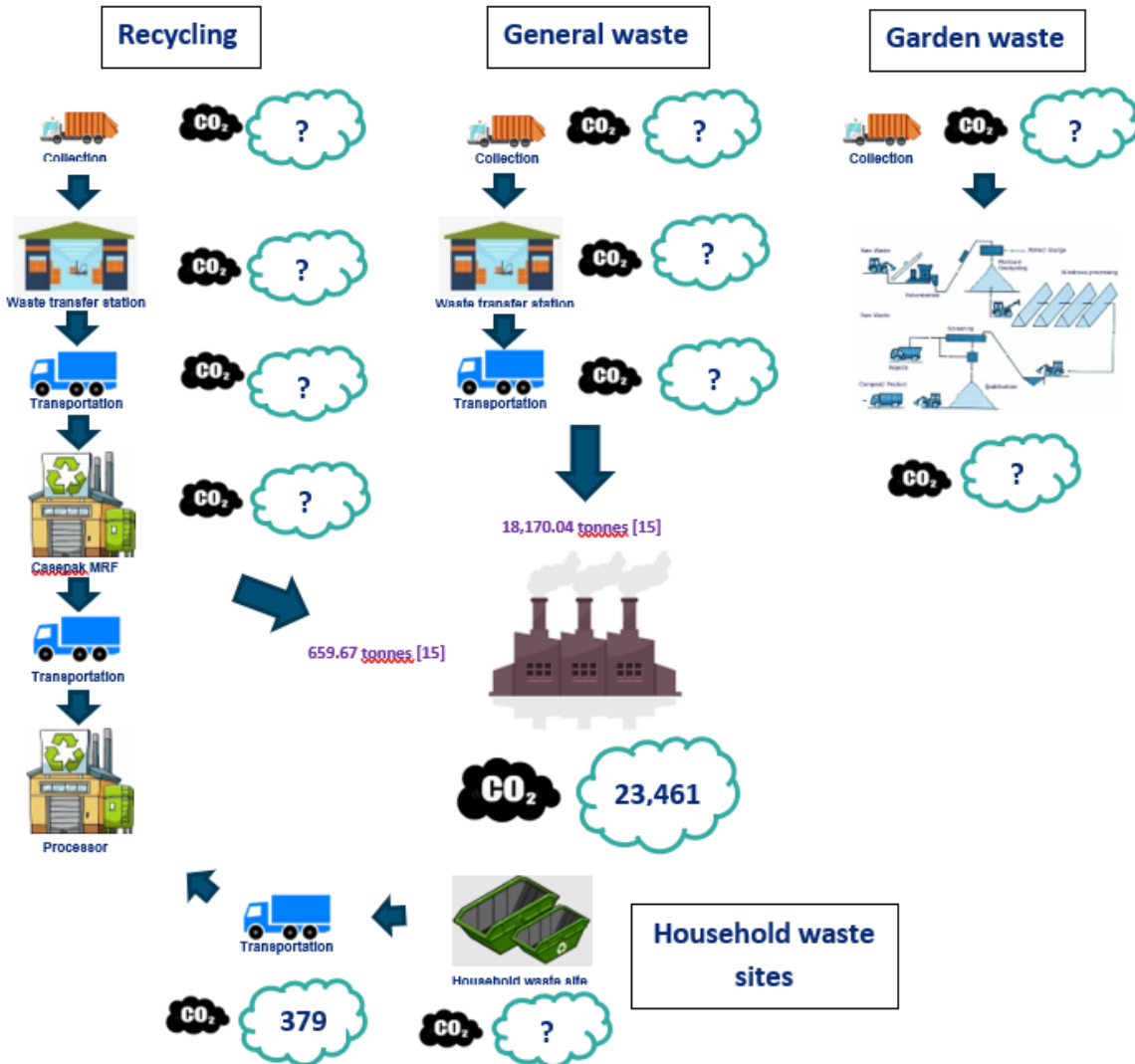


Image source ([Harboroughs Rubbish report](#))

### Pledge 6

**The Partnership will continue to offer a garden waste collection system to Leicestershire residents. This will follow Government guidelines as to the form of the collection and will be subject to legislation and total Government funding. The Partnership will continue to procure composting capacity to treat the collected garden waste in a manner that supports carbon reduction and improves soil quality.**

The collection of Green waste must be a free service, although in Harborough District the charging has been extolled as a great success and a revenue earner for the cash strapped council. However the evidence is clear that the move from a free, to a paid service, has caused a drop in collections accompanied by a commensurate increase in the general waste tonnage.



The combustion of this Green waste will cause extra, un-necessary, emissions over the free collection service.

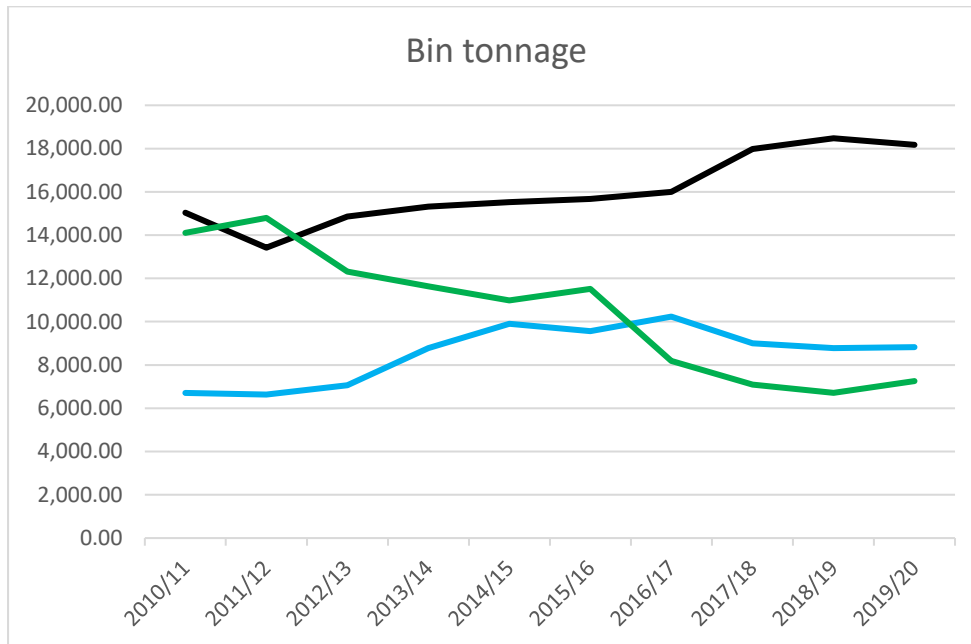


Image source ([Harboroughs Rubbish report](#))

## Pledge 7

***The Partnership shall ensure that the full range of recyclables (as specified by Government and subject to funding) are collected from residents (and businesses where applicable) across Leicestershire by 2025, or as soon as possible when contracts and circumstances dictate.***

The much vaunted, “world beating” Environment bill only stipulates that there should be separate collection of Green and food waste, the remainder can, presumably, still be collected in a single stream, comingled service.

For a circular economy to emerge, recyclates need to be collected and processed in such a way as to create products at equal value. Eg., glass needs to be separated by colour to have value, being used as aggregate is not an equal product in the circular economy. Paper and card need to be uncontaminated in order to be reprocessed as paper and plastic needs to be streamed in order to be recycled into similar products.

Most items are downcycled to lower value products which necessitates new raw materials being introduced into the loop, this is not a circular economy. The partnership needs to have a coherent plan on how to reprocess the recyclates once collected, and where there is no capacity (Due to decades of under investment) work with partners to build the required facilities.

- Hard plastics recycling (Pyrolysis)
- Textile recycling

#### Pledge 8

***The Partnership shall continue to explore the viability of adding extra materials to recycling collections (e.g. for batteries, small electric goods or clothing) aiming to keep Leicestershire's performance above the national average.***

There is not currently any way of recycling end of life clothing. Used clothes placed into the collection bins at the Household waste sites, or given to the charities, are only for re-use of good quality garments intended for re-sale.

Putting end of life clothes into these receptacles has many repercussions, excess weight of textiles being exported, pushing poor textile traders closer to poverty as they are landed with unsalable clothes, and the eventual dumping of these textiles into unregulated landfill or worse.

A real alternative needs to be provided.

#### Pledge 9

***The Partnership will put in place collection systems to contribute towards the achievement of the national 65% recycling target by 2035, this may include restricting residual waste capacity to encourage greater materials separation, carbon savings and resource recovery. Improvements in materials recovery at Household Waste Recycling Centres will also contribute towards the national target.***

Once the public is educated into how to fully use the recycling system then minimising general waste should be easily achieved. In my household we do still shop in mainstream supermarkets but only need to put out our black wheely bin once every 4-6 weeks.

However, as previously stated, the collected materials should only be classed as recycled when they are able to be converted to a raw material than can be formed into a similar quality material.

#### Pledge 10

***The Partnership will continue to allocate a communications budget sufficient to help promote good recycling behaviour and maximise resource recovery to support the circular economy and low carbon objectives of this Strategy.***

Please publish what has been done to date on this subject. We do not recall ever having been engaged by either the Waste partnership, Leicestershire County Council or Harborough District Council on how to recycle and/or how to improve behaviours.

A very small amount of money was given to Market Harborough Environmental Group to attend events and talk about waste for a short period. Likewise we are aware of the Master composter programme, which is to be commended, but again it is reliant upon volunteers to promote.

As part of this consultation we would want to see an engagement plan and its associated budget.

#### Pledge 11

***The County Council will reduce waste sent to landfill to less than 5% by 2025, well in advance of the 10% national target by 2030. The County Council will undertake future procurement processes for residual waste treatment (alternatives to landfill) in line with the vision and objectives of this Strategy***

This is a very vague statement that needs tightening up considerably. The current preferred solution for general and residual waste is to incinerate it (or Energy from waste if you want to include some energy recovery) and this should not be the councils default position, even though costs probably drive this decision.

This solution will be at odds with any Climate Emergency Action plan as it locks in the generation of CO2 as well as the legacy of dioxins and other toxic pollutants.

REDUCE - The number 1 priority should be to reduce residual and general waste.

RECYCLE - The number 2 priority should be to try and extract any value out of this waste, through Mechanical, Biological Treatment or other processes, to extract any energy and recyclates.

The eventual destruction of the waste should be something that we should avoid completely if we truly value the move to a circular economy, and as such the council should hold a zero waste to landfill or incineration aspiration, however unachievable this maybe in practical terms..

No long term, fixed volume incineration contracts with incineration/Energy from waste sites should be entered into as this promotes bad practice when items that could be recycled are sent to incineration to fulfil contractual requirements.

## Summary

Phrases such as “Circular economy” are used with scant regard to what is actually involved in implementing this. Recycling, such as it currently is, cannot be considered part of a circular economy when recyclates are down-cycled to lower quality products at each staged. This in the main is due to the mode of collection meaning that material streams cannot be consistently separated into high value material streams.

The New Environment Bill still allows for TEEP, which was defined in the EU Waste handling directive, and applied into British law as the waste hierarchy. This has never been properly implemented and never policed by the Environment Agency and allows councils to select the cheaper service delivery through comingled collections.

In short, we need kerb-side sortation to ensure a circular economy is anywhere near attainable.