

# Quality and Consistent Collections



## Summary

The Confederation of Paper Industries (CPI) campaigns for improvements in the quality of Paper for Recycling (PFR). It argues that adopting a consistent, standardised, quality focused collection regime for household collections would create benefits through the supply chain, by reducing public confusion about what can and cannot be recycled, and delivering higher quality, higher value recyclate for local authorities, waste collectors and reprocessors. CPI believes that collection methods are a key element in achieving high quality recycling, and sees little point in standardising the list of recyclables collected at kerbside if the process then renders materials unusable by cross contamination.

Consideration therefore needs to be given both to what is collected and how it is collected. Collection methodology is critical, with a dual bin approach a necessary minimum requirement, allowing paper and board to be collected separately in one bin and other packaging materials including beverage cartons, film, foils and fast food packaging in the other.

## Background

First published in 2016, the WRAP Consistency Framework<sup>1</sup> outlines a voluntary project to support the harmonisation of waste and recycling collection services amongst some 350 local authorities in England. WRAP's vision is that by 2025 all packaging will be recyclable and that most households will have a common set of dry materials and food collected in one of three ways. It is estimated that this could result in an increase in revenue to local authorities of £478 million per annum with significant benefits to reprocessors from reduced contamination and up to a 7% increase in the national recycling rate.<sup>2</sup>

The Consistency Framework proposes that local authorities should have a choice to collect kerbside recyclables in only three ways. The Paper Industry strongly supports the source separation of paper and board from other recyclables as proposed in two of the three methods, because experience shows that this delivers a much lower level of contamination than comingled collection (the third option). The storage of paper and glass together, as proposed in the multi-stream option is only acceptable if the materials are separated at kerbside, as in the Welsh Blueprint model.<sup>3</sup> CPI believes the future of comingled collection may be limited, particularly in light of recent restrictions placed on imported secondary commodities by the Chinese government.

The UK is highly dependent upon export markets to support its recycling infrastructure, and collection authorities will have to place much greater emphasis on the quality of recyclate than hitherto to secure markets for recyclate. This all creates a compelling rationale to adopt a standardised collection methodology to reduce contamination and optimise value. Careful consideration needs to be given as to whether collecting paper and board mixed with other recyclates makes commercial or environmental sense.

## Paper Industry Experience

The UK's Paper-based Industries rely heavily upon Paper for Recycling as its raw material. In 2019 over 3 million tonnes of the 7.3 million tonnes collected in the UK was consumed in domestic mills, and the remainder was sold into the global commodity market. To ensure a thriving domestic industry and to secure export outlets, it is vital that the recovery system delivers a high quality raw material to reprocessors. The increasing adoption of comingled collections as a path of least resistance for the public, and the failure of authorities to properly police the MFR Code of Conduct, with a general priority placed on quantity over quality, have all contributed to a general and significant decline in the quality of post-consumer PFR being delivered to UK paper mills over the past decade. Escalating waste disposal costs have also

placed a further burden on paper producers, who find themselves taking responsibility for the failure of the supply chain. Local authority procurement contracts encouraging contamination levels above those specified in EN643 cannot be considered High Quality recycling as required by law, nor can the materials they produce be considered mixed paper ready for recycling.

## The Future

In February 2019, the Government opened a consultation on *Consistency in household and business recycling collections in England*<sup>4</sup>. CPI responded, supporting proposals for the collection of a core set of materials at kerbside. CPI also suggested that to ensure high quality: “For fibre (paper and card) this can only be achieved through the separate collection of this stream.” Despite compelling evidence both from the paper industry and from WRAP, central Government continues to shirk responsibility for mandating collection methodology to local Government.

The UK’s Paper-based Industries believe it is time that the Government in England shows leadership by legislating to require local authorities to implement consistency and provide funding to support the transition to a standardised collection system. This, combined with work such as the WRAP Recycling Guidelines<sup>5</sup>, designing for recyclability (See [CPI Recyclability Guidelines](#)<sup>6</sup>) and On-Pack labelling will provide clarity for the public.

At the time of writing, the Government continues to develop its proposals for consistent collections with the aim of opening a second consultation in early 2021 and implementing change in 2023. In the coming months, it will have a once in a generation opportunity to get the UK’s recycling system right. Paper and board should be collected separately from other recyclates in a “dual stream” collection. This should be a minimum requirement for all Local Authorities, with few or any exceptions on the basis of significant logistical challenges. The Welsh “blueprint” is an exemplar of what can be achieved with the right balance of investment and intervention.

Without such an intervention, the risk for the UK economy is continued disinvestment in UK paper production and recycling infrastructure, coupled with an inability to sell a contaminated recycling product into global markets. This will create a landfill and

incineration challenge for the UK that will undermine the achievement of UK carbon targets and render as waste, materials that should be a pillar of the circular bioeconomy.

Developing a Quality Culture is the only way to achieve future recycling targets and educate citizens about the value of resources. Promoting the proper separation of materials at source will achieve this, thus helping to transition the UK to a circular, resource efficient economy.

As pressure on global resources increases in future, it is important that opportunity is taken to fully utilise secondary commodities. Comingled collection should have had its day. The advent of Circular Economy and sustainability must drive new behaviours, with all parts of the supply chain taking responsibility for the quality of material delivered back to the resource loop. This includes consumers and those acting on their behalf. The consistent collections could provide a low impact mechanism to change consumer behaviour and improve raw material quality.

## Paper Industry Position

The Paper Industry seeks the following:

- Government to legislate to require local authorities to adopt consistent collections
  - o Mandating a prescribed set of materials to be collected at kerbside
  - o Specifically, mandating the adoption of source separated collection of paper and board at kerbside (minimum requirement dual stream collections)
  - o Provide soft loans or grants to help transition local authorities
- A specified limit placed on contamination in allowable local authority contracts for kerbside collected post-consumer Pfr
  - o This should be to levels demanded by EN643 but with an initial derogation to 5%
  - o 5% is only permissible where waste is marketed specifically “for further sorting”
- Paper and board should NEVER be collected with glass

- Greater focus needs to be placed on the quality of material collected, for example, by ensuring inspections of MRFs are undertaken to verify MRF material sampling regimes and stated quality results.

### Further Information

Further information is available from Simon Weston, CPI Director of Raw Materials on 01793 889605 or email [sweston@paper.org.uk](mailto:sweston@paper.org.uk).

### Confederation of Paper Industries

- The Confederation of Paper Industries (CPI) is the leading trade association representing the UK's Paper-based Industries, comprising paper and board manufacturers and converters, corrugated packaging producers, makers of soft tissue papers, and collectors of paper for recycling.
- CPI represents an industry with an aggregate annual turnover of £12 billion, 62,000 employees, which supports a further 100,000 jobs in the wider economy.
- For facts on the UK's Paper-based Industries please visit: [www.paper.org.uk](http://www.paper.org.uk).

<sup>1</sup> [http://static.wrap.org.uk/consistency/Read\\_more\\_about\\_the\\_framework.pdf](http://static.wrap.org.uk/consistency/Read_more_about_the_framework.pdf)

<sup>2</sup> Ibid

<sup>3</sup> <http://www.wrapcymru.org.uk/sites/files/wrap/Municipal%20Sector%20Plan%20Wales%20-%20Collections%20Buleprint.pdf>

<sup>4</sup> [https://consult.defra.gov.uk/environmental-quality/consultation-on-consistency-in-household-and-busin/supporting\\_documents/recycleconsistencyconsultdoc.pdf](https://consult.defra.gov.uk/environmental-quality/consultation-on-consistency-in-household-and-busin/supporting_documents/recycleconsistencyconsultdoc.pdf)

<sup>5</sup> <https://wrap.org.uk/sites/files/wrap/Recycling%20guidelines%201.9.pdf>

<sup>6</sup> [https://thecpi.org.uk/library/PDF/PublicPublications/Guidance%20Documents/CPI%20Recyclability%20Guidelines%20Revision%201\\_Jan2020.pdf](https://thecpi.org.uk/library/PDF/PublicPublications/Guidance%20Documents/CPI%20Recyclability%20Guidelines%20Revision%201_Jan2020.pdf)

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