



Association of Directors of  
Environment, Economy, Planning & Transport

Simpler Recycling Team  
DEFRA  
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20/11/2023

By email to: [recycling@defra.gov.uk](mailto:recycling@defra.gov.uk)

Dear Naomi and team

### **Consultation on exemptions and statutory guidance for Simpler Recycling in England: ADEPT response**

This is a consultation response on behalf of the Association of Directors of Environment, Economy, Planning and Transport (ADEPT).

ADEPT represents 'directors of place' who are responsible for providing day-to-day services including local highways, recycling, waste and planning as well as the strategic long-term planning and delivery of sustainable places. ADEPT members are at the very heart of delivering clean sustainable growth, tackling climate change at a local level. We manage the projects that are fundamental to creating more resilient, inclusive and safe communities, economies and infrastructure. ADEPT is a membership based professional organisation with over 100 county, unitary and combined authority members.

A response to the numbered questions in the consultation follows. In addition there are a number of key concerns that ADEPT wishes to raise in relation to Simpler Recycling:

- **Clarity over new burdens payment values is needed now.** The Government's ambition is for Simpler Recycling services to be provided to all residents by 31 March 2026. In order for councils to implement Simpler Recycling, they will need to plan, invest in and deliver improvements to infrastructure (depots, MRFs); procure or negotiate different processing and collection service contracts; and order new fleets of vehicles and containers. In order to take the key investment, procurement and service decisions, local councillors will rightly ask what the impact will be on their authority's budget. Until councils have indicative figures for the value of new burdens funding for the requirements of Simpler Recycling, councillors are faced with a choice between 'signing blank cheques' or missing the Government's deadlines.
- **What is the service requirement for Cartons?** Based on previous Consistency consultations, this composite material packaging format was expected to be part of the 'Simpler Recycling' mix, but its position is unclear.
- **Resource security and investment in infrastructure** – the Collection and Packaging Reforms present a massive opportunity to increase UK resource security and reduce reliance on volatile overseas markets and to deliver green jobs. However the UK's MRF and reprocessing facilities are not currently fit for purpose to reprocess the volume, mix and quality of materials required under Simpler Recycling and pEPR. Government needs to develop and communicate a clear plan for the necessary investment in UK infrastructure to take advantage of this economic opportunity and to avoid worsening UK security.

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- **Non-household premises requirement needs to align with household implementation date** – both material streams rely upon the same infrastructure for collection, sorting and reprocessing. WRAP estimates that an additional 1,000 vehicles will be required to provide Simpler Recycling collections from non-household premises; by requiring an earlier compliance date (2025) for non-household premises DEFRA will effectively destroy any opportunity for councils to meet the 2026 date for households by exacerbating the already widely recognised supply chain challenges.
- **Effective communication to non-household premises** - all occupiers but especially SMEs will need to understand their new obligations. This will require a concerted and effective communications campaign. Evidence from the recent introduction of the Single Use Plastics Ban (Oct 2023) indicates very few SMEs were aware, suggesting communications was too little too late.

Q1 – Would you like your response to be confidential?

A - No

Q2 – What is your name?

A - Steve Palfrey

Q3 – What is your email address?

A - [steve.palfrey@suffolk.gov.uk](mailto:steve.palfrey@suffolk.gov.uk)

Q4 – Which of the organisation types below best describes you?

A - Local Government

Q5 – If you are responding on behalf of an organisation, what is its name?

A - the Association of Directors of Environment, Economy, Planning and Transport (ADEPT)

Q6 – Do you agree or disagree that places of worship should be included as a relevant non-domestic premises for the separate collection of waste?

A - Agree

Q7 – Do you agree or disagree that penal institutes should be included as a relevant non-domestic premises for the separate collection of waste?

A - Agree

Q8 – Do you agree or disagree that charity shops selling donated goods originating from a domestic property should be included as a relevant non-domestic premises for the separate collection of waste?

A - Agree

Q9 – Agree

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# ADEPT

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Q10 – Do you agree or disagree that premises used wholly or mainly for public meetings should be included as a relevant non-domestic premises for the separate collection of waste?

A - Agree

Q11 – Do you agree with the above proposal, where dry recyclable waste is collected co-mingled from certain collection points, to use the waste tracking service to record which recyclable waste streams have been co-mingled?

A - Unsure – basically agree BUT whilst the explanation of ‘comingled’ here “meaning two or more recyclable waste streams mixed together” is helpful, that wording should also be consistently used, e.g. in the wording of the proposed SoS exemption in order to provide clarity.

I would welcome the opportunity to discuss any of the points above in more detail if this is useful to the team, and look forward to further refinements to the Simper Recycling policy and guidance in order to ensure that local and national government is able to maximise the success of this key reform.

Yours sincerely,

Steve Palfrey, Chair of ADEPT Waste Panel

