

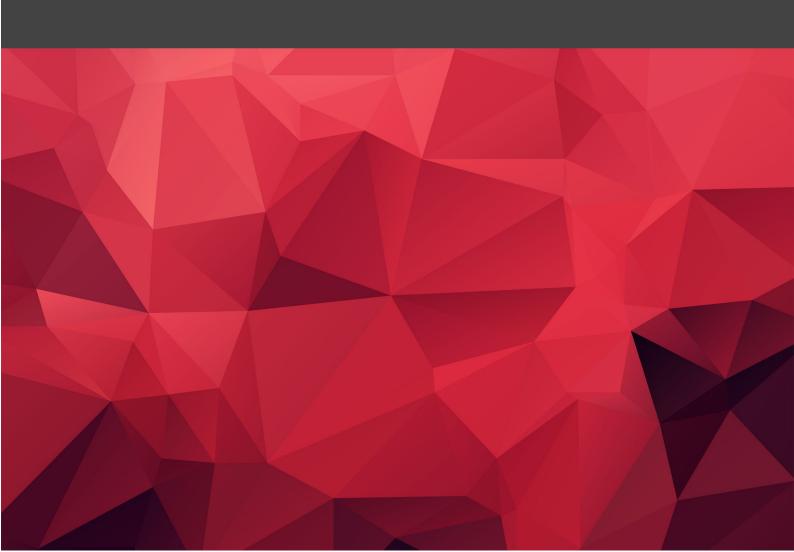
Archwilydd Cyffredinol Cymru Auditor General for Wales

Waste management review – Vale of Glamorgan Council

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This document is also available in Welsh.

The team who delivered the work comprised Ian Phillips, Sian Davies and Sara-Jane Byrne under the direction of Huw Rees.

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Summary report

Summary

What we reviewed and why

- We reviewed the Council's arrangements for reducing waste and meeting statutory recycling targets. Waste management is an important and complex issue, with a range of environmental and financial implications. It is important that the Council has robust arrangements in place to manage waste and meet its current and long-term environmental obligations.
- The Welsh Government has set long-term targets for recycling of municipal waste and there is potential for financial penalties to be levied on Councils that do not achieve the targets. The targets are:
 - 58% by 2015-16
 - 64% by 2019-20
 - 70% by 2024-25
- The Council's re-use/recycling performance in 2017-18 was 63.2%, against the Council's own target of 65%, slightly down from its performance in 2016-17, which was 65.3%. This reflects a dip in the recycling rate across Wales for 2017-18, which was partly due to an improvement in the quality of reporting ¹.
- The Vale of Glamorgan Council (the Council) has operated a 'co-mingled' household recycling service since 2011 where recyclable waste (for example, glass, paper, metal, plastic) is collected and sold on as mixed materials.
- The Council is in the process of changing the waste management service it provides to households. In July 2018, Cabinet agreed to implement the Welsh Government's Collections Blueprint² which relies on collection of separate dry recycling materials from households. The Blueprint also advocates the restriction of residual waste (black bag) collection to help drive higher participation in household recycling.
- The Council introduced a two bag per fortnight limit on residual waste in the Autumn 2018, and plans to introduce a weekly separate dry recycling collection service starting in October 2019.
- We undertook the review during the period June to September 2019.

¹ Official waste statistics for 2017-18. See this link

² The Collections Blueprint sets out the Welsh Government's recommended service profile for the collection of waste from households. The Blueprint relies on the collection of recyclable resources that are presented part-segregated by residents. Those resources are then further sorted by operatives as they are collected. The Collections Blueprint provides councils with one way of complying with the legislation on kerbside collection. Welsh Government. Municipal Sector Plan Part 1 Collections Blueprint. March 2011.

What we found

- Our review sought to answer the question: Does the Council have robust plans to reduce waste and achieve the national recycling/re-use targets?
- Overall, we found that the Council is making significant changes to household recycling collections and is on course to meet Welsh Government recycling targets but will need to develop a long-term waste management strategy, address the service's financial pressures and develop a more structured and documented approach to involving the diversity of the population.
- 10 We reached this conclusion because:
 - the Council is following national guidance on household waste management, although the development of an overall strategy would enable its waste management service to reflect wider social, economic and environmental goals;
 - the Council has significantly improved its recycling performance but will need to address the financial risks and pressures of the service as part of its forward planning; and
 - the Council has engaged with residents while making changes to its recycling service but needs to consider a more structured and documented approach to involving the diversity of the population.

Proposals for Improvement

Exhibit 1: Proposals for Improvement

The table below sets out the proposals for improvement that we have identified following this review.

Proposals for improvement

- P1 The Council should ensure that its forthcoming waste management strategy is sufficiently long-term, reflects wider social, economic and environmental goals, and addresses the financial risks to the service going forward.
- P2 The Council should consider whether it has the staff resources to develop, manage and deliver the service changes in a sustainable way.
- P3 The Council should introduce a more structured approach to involving the diversity of the population in relation to significant service changes.
- P4 The Council should fully complete Equality Impact Assessments in relation to significant service changes.

Detailed report

The Council is making significant changes to household recycling collections and is on course to meet Welsh Government recycling targets, but will need to develop a long-term waste management strategy, address the service's financial pressures and develop a more structured and documented approach to involving the diversity of the population

The Council is following national guidance on household waste management, although the development of an overall strategy would enable its waste management service to reflect wider social, economic and environmental goals

- 11 In reaching this conclusion we identified the following strengths:
 - The Council is following the Welsh Government recommended approach to waste management and recycling by fully adopting the Collections Blueprint and working with the Waste and Resources Action Programme (WRAP). Moving towards a source separated system for collecting recycling would ensure greater traceability of recycled materials to end destinations in the UK.
 - Residual waste is being managed through the Project Gwyrdd Energy from Waste plant in Cardiff Bay under a 25-year contract.
 - Food waste is managed by anaerobic digestion³ under a joint venture with Cardiff Council under a 15-year contract. Garden waste goes to a compost facility in Cardiff Bay.
 - The Council is in the process of changing its household waste recycling collections to a source separated system that should yield high quality material for onward reuse. Residual waste restriction has already been rolled out across the whole Council area.
 - These changes are designed to enable the Council to meet national recycling targets and help make its waste management service more financially sustainable in the long term.

³ **Anaerobic digestion** is the process by which **organic** matter such as **food waste** is broken down to produce biogas and biofertiliser. This process happens in the absence of oxygen in a sealed, oxygen-free tank called an **anaerobic digester**.

- We identified the following areas for development:
 - The waste service changes were comprehensively set out in two reports to Cabinet in 2018, but there is no overall waste management strategy, apart from one dating from 2004 which has essentially been superseded by the July 2018 report to Cabinet. The Council intends to produce a new waste management strategy in 2020. Welsh Government statutory guidance on the Well-Being of Future Generations Act (WFG Act) states an expectation that public bodies look at least ten years ahead. The Council is making significant changes to its waste management services for the long term and would benefit from having an overall strategy to help it do this and to reflect wider social, economic and environmental (including carbon reduction and waste prevention) goals.
 - The management of the service changes and the development of a new transfer station are being overseen by two officers. Concentrating knowledge and experience in such a small team represents a significant risk in delivering the service changes. The Council needs to consider whether it has the staff resources to develop, manage and deliver the service changes in a sustainable way.

The Council has significantly improved its recycling performance but will need to address the financial risks and pressures of the service as part of its forward planning

- 13 In reaching this conclusion we identified the following strengths:
 - The Council has received support from WRAP through the Collaborative Change Programme to review its existing recycling and waste services to look at how aspects of the service can be improved in the future.
 - As part of this support, WRAP undertook a modelling exercise on behalf of the Council on the cost effectiveness of a variety of different recycling and waste kerbside collection systems. This work concluded that the Collections Blueprint was the most cost-effective system.
 - The Council has secured funding from the Welsh Government for the necessary infrastructure and has rolled out changes to black bag collections. The Council has agreed to introduce separate household recycling collections in the rural Vale in October 2019, in Barry in Spring 2020 and in Penarth in summer 2020.
 - The Council is confident that recent changes have already had a positive impact on its recycling performance, and figures for 2018-19 show that it has improved its recycling rate to 67.1%. The Council is on track to exceed the statutory recycling target of 64% by 2019-20. The quarter 1 performance report that went to the Environment and Regeneration Scrutiny Committee in November 2019 reported a recycling rate of 74.34%. Welsh Government has expressed confidence in the Council's ability to meet recycling targets in the coming years.

- When compared with other local authorities in Wales on a per household basis, the Council's waste management service has a track record of being one of the lowest cost.⁴
- The Council has sought to learn from other councils in Wales that have adopted the Collections Blueprint.
- Officers are planning a new waste transfer station adjacent to an existing Household Waste Recycling Centre (HWRC) in Barry that will receive the bulk of the separate recycling from the Vale of Glamorgan area. The timetable is for the transfer station to be operational by October 2020. Having the HWRC and the Waste Transfer station on one site offers the potential for cost and operational efficiencies.
- The Council has secured limited temporary capacity to take the separate
 recycling collections from the rural Vale at a facility in Cowbridge. The two
 systems (co-mingled recycling and separate recycling) will run in parallel for
 at least a year while the new transfer station is built.
- Welsh Government and Natural Resources Wales have not raised any specific concerns about existing waste services or the services changes being planned.
- 14 We identified the following areas for development:
 - The Council's Medium Term Financial Plan sets out a predicted revenue cost pressure of £630,000 for Waste and Recycling Services in 2019-20. The service has experienced unforeseen financial demands and reserves of £757,044 were used in 2018-19 in relation to the co-mingled recycling contract. This was due to the Council receiving reduced income as a result of the global downturn in prices for co-mingled recycled waste. The service overspent by £235,000 in 2017-18 and by £1.4 million in 2018-19. The latest Corporate Risk Register sets out that the waste service continues to be under significant budgetary pressures and the waste risk score has been increased to medium/high. A key part of the forthcoming waste strategy will be the need to demonstrate how the service will address these financial risks going forward.
 - The change to separate household recycling collections is dependent on the relatively rapid development of a waste transfer station in Barry. A risk assessment and an appropriate contingency plan should be in place to allow for any delays.

⁴ WLGA benchmarking on waste management costs for 2016-17 sets out when compared with the other local authorities in Wales on a per household basis, Vale of Glamorgan Council were ranked as having the 3rd lowest cost. For 2017-18 the Council were ranked as the 4th lowest cost.

The Council has engaged with residents while making changes to its recycling service, but needs to consider a more structured and documented approach to involving the diversity of the population

- 15 In reaching this conclusion we identified the following strengths:
 - The Council worked with WRAP to develop a bespoke communications plan ahead of the roll-out of the service changes. This brought in expertise and lessons learnt from other part of Wales.
 - Residents were encouraged to complete an online survey during April and May 2018 ahead of any service changes. This survey sought to raise awareness of the changes coming and to gather information from residents on how they could best introduce the changes, for example on barriers to recycling and preferences on containers. The Council received over 6,000 responses to the survey, which represents over 10% of households in the Council area. The responses to the consultation can be seen to have influenced the way in which the subsequent arrangements for the new service were designed. An example of this is the introduction of a 'quad sack', a single sack with four compartments, thus avoiding the need for four separate containers. This was introduced for residents who advised that they either had limited storage or relatively small amounts of recycling.
 - The Council used a variety of mechanisms to engage with residents while introducing the black bag limit. This included direct communications, social media posts, newspaper adverts, roadshows, a waste helpline, presentations to community groups and the use of waste wardens, who were temporarily employed to assist residents.
- We identified the following areas for development:
 - Welsh Government statutory guidance on the WFG Act (Shared Purpose: Shared Future) states an expectation that public bodies will involve a diversity of people and communities in decisions which may change the services provided to them. The Council has demonstrated a wide-ranging consultation exercise. However, this would benefit from being complemented with a more structured and documented approach to engaging with, and responding to, the diversity of the population (such as disabled groups, older people, people from different socio-economic groups) on waste management matters. Officials have not talked specifically to any representative groups other than those residents who attended roadshows.
 - The Equality Impact Assessment (EIA) carried out ahead of the introduction of the two black bag limit (dated March 2018) is incomplete. It sets out what the proposed service changes are and who the proposal will affect, but the actual assessment of impact was not completed. The July 2018 Cabinet report relating to the Blueprint and the restricted residual waste changes indicated that an EIA would be required as there would be significant service change, but there wasn't an EIA provided to Cabinet alongside the July 2018

report, although the need to address any equality impacts associated with the service changes was noted in the recommendations to the report. The absence of a complete EIA hampers the ability of the Council to demonstrate that it has fully considered the needs of the diversity of the population. When a decision clearly affects a considerable number of people, public bodies must give careful consideration to their Equality Duty under the Equality Act 2010. A thorough EIA with analysis and evidence, setting actions for monitoring impact is an opportunity to demonstrate such consideration.

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