



National Household Hazardous Waste Forum response to “Review of England's Waste Strategy - A Consultation Document”.
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The waste strategy consultation document proposes the following main options for encouraging separate collections of household hazardous waste (HHW):

- a) requiring local authorities to publish details of their HHW services
- b) specifying a minimum level of service expected of local authorities, linked to the Haz Guide
- c) reviewing and, if necessary, strengthening legal requirements on local authorities
- d) extending the range of producer responsibility agreements or compulsory producer targets.

Defra has indicated in its Partial Regulatory Impact Assessment that the Government's preferred approach is to progress options a) and b) and consider option c) only if these actions appear unlikely to have an impact. Defra has also indicated that producer responsibility would initially be taken forward on a voluntary basis only.

The NHHWF welcomes the renewed impetus for separate collection of HHW that the consultation document indicates, and outlines its views on each of the main options proposed below. In the long-term, as recycling rates rise, separation of HHW will be required to protect residual waste treatment facilities from hazardous substances. Early investment in new collection infrastructure and services will avert future problems.

The NHHWF notes that a review of some aspects of legal requirements on local authorities may be necessary to ensure that separate collections of HHW are maximised. New requirements would require provision of additional funding under the new burdens principle as appropriate. The NHHWF is ready to assist in developing these proposals.

Publication of service details

The NHHWF endorses the proposed requirement on local authorities to publish details of any HHW services provided. This should include publication in various media including:

- websites, with updates to reflect service changes
- annual or more frequent publication with council tax bills and/or in free council newspapers.

Published information should include details of location, materials accepted and opening hours for household waste recycling centre (HWRC) collections. For collection services, details should include a contact telephone number, materials collected and other relevant information such as charges, eligibility, waiting times and number of collections permitted per year. Publication of information should be supported by training of helpline staff, with updates as required.

Specification of a minimum level of service

Specification of a minimum level of service for local authorities should ensure that facilities for safe disposal of HHW are accessible to all householders. This will require consideration of facilities at HWRCs and also the availability of collection services.

Facilities at household waste recycling centres

Space restrictions at some household waste recycling centres (HWRCs) may prevent collection of all types of HHW at all sites, but the NHHWF recommends that:

- all HWRCs should have facilities for safe storage and disposal of the more common types of HHW, including car batteries, hazardous WEEE, household and garden chemicals
- at least one HWRC in any waste disposal authority (WDA) area should provide facilities for all HHW, including less commonly occurring waste such as asbestos.

Providing facilities for more commonly occurring HHW at all sites, especially for those items that are small enough to be easily placed in general waste collection bins, will be essential to achieve high levels of segregation.

Collection services

Facilities at HWRCs often do not take account of householders without access to their own means of transport. Also, not all HHW is suitable for members of the public to transport to a HWRC, eg collections of old, unidentifiable and potentially unstable chemicals found in sheds or garages.

Many local authorities run collection services that cater for more dangerous wastes, or for residents without transport, eg City of Bradford, City of London (covering all but one London borough), Derbyshire County Council, Leeds City Council, and Oxfordshire County Council. These services are often provided by partnerships of WDAs and waste collection authorities (WCAs). The NHHWF recommends that the provision of HHW collection services of this type should be made mandatory, with charges made at the discretion of the local authority. Minimum waiting times should be specified, eg three months, with a more immediate response required for potentially dangerous substances.

Local authorities would need to develop measures to ensure that:

- collection services are restricted to domestic waste
- services are only used where no accessible alternative is available, or where items may present a risk if transported by a member of the public
- a concessions system is in place for low-income households if charges are made.

HHW collection services are likely to be most efficiently provided through partnerships between neighbouring authorities, or between WCAs and WDAs in two-tier areas. Such partnerships should be encouraged and supported by government in developing the Waste Strategy proposals. Domestic HHW collections can be effectively run alongside collections of hazardous waste from the commercial sector, providing a facility for small and medium-sized companies that may otherwise experience difficulty in accessing appropriate services.

Good practice guidance should be developed for delivery of HHW collection services, which may require research into existing practice and pilot projects.

Producer responsibility

Defra should actively pursue dialogue with producers' associations regarding producer responsibility agreements for specific HHW streams including paint and related DIY products, and household and garden chemicals.

Research on the proportions of hazardous substances being disposed of (as opposed to being used for their intended purpose) should be carried out, taking account of hazardous substances disposed of to residual waste and separately collected fractions.

If it does not prove possible to reach voluntary agreements within a specified timescale, then other approaches, including compulsory collection targets, should be considered.

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