

Appendix 3

Subject: Small Business Recycling at Household Waste Recycling Centres

Electoral Division: The initiative is intended to cover all electoral divisions

Summary: KCC proposes a pilot project to be introduced at permitted Household Waste Recycling Centres (HWRCs), (with the intention of a policy change to enact a further rollout to a wider remit of approved sites) seeking to address business waste brought to the facilities by small traders, with the focus on providing a valuable recycling service to small business owners, to increase recycling rates and realise income via commodities that attract revenue.

1. Introduction

- 1.1 This report outlines an initiative which will introduce a recycling service for small businesses at Household Waste Recycling Centres (HWRCs) across Kent which are permitted to carry out the activity.
- 1.2 The scope of the project is to target small business owners who require an affordable outlet for their business recycling, with the objective that KCC's recycling rates increase, and materials are received that have a commodity value.
- 1.3 An initial pilot will be held at the Canterbury and New Romney sites which already have in place permits allowing the acceptance of trade waste; this will be used to inform a further roll out of the initiative at other HWRCs.
- 1.4 The objectives for the initiative are:
 - i. To implement a scheme which small businesses find an attractive option for recycling their waste;
 - ii. To increase recycling rates at all participating sites;
 - iii. To increase commodity revenue by accepting valued materials;
 - iv. To have minimum impact on the public's experience of using the waste sites by restricting access to traders to one day a week.

2. Proposal

- 2.1 Kent County Council is the Waste Disposal Authority and as such is responsible for the disposal of controlled Local Authority Collected Waste deposited by the Waste Collection Authorities (District Councils), and for providing a network of HWRCs for residents to deposit their household waste.
- 2.2 The Controlled Waste (England and Wales) Regulations 2012, state that Trade Waste is not considered "Household Waste" and as such, is not currently accepted at the HWRCs; however, there is an opportunity, via planning and permit variations for KCC to offer small businesses a much needed recycling service for their Trade Waste materials using the vital network of HWRC sites conveniently located across the County.

- 2.3 Planning and permitting variations incur a varied timeframe, where currently Permit approvals are taking between 6-9 months.
- 2.4 At this time, most Kent Waste Transfer Stations offer a Trade Waste service to local businesses which is usually taken up by larger companies that remove waste for other people for a fee, i.e. house clearance, skip companies etc. This provision is a commercial service carried out by the facility operator, and incorporates a calculated gate fee set by the operator, usually based on market conditions.
- 2.5 Kent County Council wishes to support local businesses and encourage commercial growth, and therefore would like to offer an alternative solution for smaller or micro businesses in local areas. KCC is in a unique position to provide a convenient service to business owners who do not have a local affordable outlet and would like to legitimately dispose of their recycling waste.
- 2.6 KCC operates 19 HWRCs across Kent, of varying sizes and capacity. In recent years, waste tonnages nationally have decreased and there is now an opportunity to utilise the capacity within sites to accept more recyclable waste, benefitting both the customer and KCC's revenue streams.
- 2.7 KCC is not intending to accept any residual waste, i.e. non-recyclable, as part of this initiative. By accepting 'recycling only' materials, KCC can keep the charges to a low rate which would be attractive to the market; where recycling materials are presented as an income generating commodity, the charge could be limited to a minimum flat fee to offset onward haulage, or taken free of charge.

Proposed charging for accepted materials:	
Small, fixed fee or FOC:	Recyclable packaging, Textiles, Metal, Paper & Card, Small WEEE, Bulbs and Glass;
Variable Charges apply	Green Waste, Hard Plastics, Wood and Paint
Under existing Charging Policy	Soil, Rubble, Hardcore, Ceramics, Plasterboard and Tyres
Out of Scope (not accepted)	Hazardous, including asbestos, chemicals and oil-based paints; Residual (Household Waste, i.e. food, black bag waste); Waste that is not recyclable or not able to be pre-sorted; Furniture, carpets and mattresses; Commercial Fridges or Freezers; Engine Oil, Fuel or Car Parts.

- 2.8 The booking system is vital in the success of this initiative. The booking system will not only ensure that legitimate bookings are made where the small business must declare they hold an appropriate level of waste carrier's licence, but also that residents using the sites are not inconvenienced by this activity, or that the facilities are not overwhelmed by traders at any one time.

- 2.9 It is intended that registered small businesses, with a “lower tier” waste carrier’s licence will be able to:
- a) Pay for the waste based on vehicle and material type;
 - b) Deposit many recyclables for a small fee or free of charge;
 - c) Feel confident that they know what happens to their waste;
 - d) Inform their clients that their waste has been disposed of responsibly and is being recycled via a legitimate outlet managed by Kent County Council.
- 2.10 For each business owner to be eligible for the Small Business Recycling Scheme, they will need to confirm the following:
- i. the Business should have less than 10 employees, as defined by the Small Business Association (and is therefore classed as a micro or small business);
 - ii. the Business operates predominantly in Kent County Authority and has a trading address in the area;
 - iii. the Business produces waste of a similar nature to householder’s recyclable waste, i.e. not industrial or heavy commercial;
 - iv. the waste is produced by the Business bringing it to the site;
 - v. the Business is in possession of a lower tier waste carrier’s licence appropriate for the size of the business, as required by law;
 - vi. the Business owner consents to follow the site rules including separating waste for recycling and observing health and safety procedures as instructed by the site staff.
- 2.11 KCC Waste sites are regularly at risk from large commercial firms and businesses wanting to dispose of their trade waste at public expense. Currently, users of oversized vehicles can access Household Waste Recycling Centres to dispose/recycle their waste (subject to certain vehicle types and vehicle size restrictions). KCC operates a Voucher System to manage access for any customer who wishes to use a vehicle other than a car to mitigate the risk of Trade Waste abuse of the sites.
- 2.12 As such, to avoid abuse of the initiative, which other Authorities have suffered from, it is proposed that the voucher and booking system will be used in parallel. This will ensure that a) only residents deposit their household waste, and b) pre-approved small business recyclers are given access at specific times to dispose of their recyclables at HWRCs.

3. Financial Implications

- 3.1 It is estimated that the revenue linked with increased recycling commodities is valued at £190,000 p/a, which may have a part year effect dependent on Permit approval duration.

4. Legal implications

- 4.1 HWRCs are provided for the deposit of household waste by householders in the administrative area. Under the Environmental Protection Act 1990 (EPA 1990), commercial waste must be disposed of at appropriately permitted facilities for a reasonable charge and anyone transporting such waste is subject to the requirements of duty of care (set out at section 34 of the EPA 1990).
- 4.2 All businesses have a legal duty of care to make sure their waste is disposed of safely, appropriately and legally, either by themselves or by a licensed waste carrier. Businesses that are contracted to carry somebody else's waste must hold a valid Waste Carrier's Licence. KCC will require evidence that the carrier of the waste has a lower tier licence, which is free to obtain. Businesses can be fined up to £5,000 by the Environment Agency if they do not have a valid Waste Carrier's Licence when transporting waste.

5. Equalities implications

- 5.1 An EQIA is not required as it is a Business to Business initiative and as such, not required to be covered by specific protected characteristics.

6. Conclusions

- 6.1 KCC is proposing a pilot of approximately 3-6 months, with the intention of a full-roll out across sites where permitted, for small business recyclers to utilise the HWRC network in Kent on specific days where it is appropriate to do so. Once the pilot is completed, and permitting and planning secured, a further ETCC report shall be made for consideration. The main objectives are to drive up recycling rates, increase commodity revenue streams via acceptance of valuable recycling materials and provide a much needed local outlet for small businesses.

7. Contact details

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