

The Business Services Association

Recycling Services

Introduction

1. The BSA - The Business Services Association - is the industry body that represents companies, and their advisors, delivering outsourced and business services across the private and public sectors. A full list of members is provided in an annex.
2. BSA members are involved across the full range of public service provision - including health, education, defence, environmental, food service, waste management, housing and other local services, IT and digital services, security and transport.
3. Full members have a combined worldwide turnover of c.£80 billion and employ around two million people. In the UK the combined turnover is c.£30 billion and around half a million people are employed across the country. The turnover across all outsourced sectors is in the region of £207 billion - some 8% of total economy-wide output - and the industry employs 10% of the UK workforce.¹
4. The focus of this policy paper is to help inform Defra's thinking on the recycling services market, informed by the experiences of our members. This focuses on two central areas:
 - The impact of proposed technical changes to the Waste (England and Wales) Regulations 2011.
 - How to make the market for recycling services work more effectively, so as to deliver better quality and higher rates of recycling.

Waste (England and Wales) Regulations 2011

5. Defra is in the process of drafting technical changes to the Waste (England and Wales) Regulations 2011. This is in response to concerns that the regulations do not fully meet the intention of the EU-revised Waste Framework Directive. As a consequence, the Regulations are expected to allow only qualified use of co-mingling, based on quality and practicality criteria.
6. One of the most important factors for improving recycling rates is the ease with which people can participate. Evidence from BSA members indicates that consumers and households are more like to recycle waste through co-mingled waste collection systems. This has been supported by similar evidence from North East Derbyshire District who managed to more than double recycling rates with the introduction of co-mingled collections.² Official WasteDataFlow information for 2009/10 also found that co-mingled dry recycling improved recycling rates for local authorities.

¹ Oxford Economics report for the BSA, April 2011: *The Size of the UK Outsourcing Market - Across the Private and Public Sectors*.

² MRW - Local authority doubles recycling rates with new commingled collection system - 26 August 2011

7. Reducing the availability of co-mingled recycling collections may have the unintended consequence of reducing recycling rates and result in more waste going to landfill. Any qualifying criteria that are introduced as part of the Regulations must be open and flexible enough to enable the ongoing use of co-mingling where this will deliver better recycling rates. The final arrangements the UK government introduces must abide by EU law, but should not result in an over interpretation of EU law which could damage the UK's market for recycling services.
8. Commingled systems will be particularly important for promoting recycling rates in areas where there is limited available space or where it is particularly suited for the end user. For instance, co-mingled facilities will be far more practical in primary schools where space is limited and children are in the process of learning about the importance of recycling.
9. One of the stated aims for introducing these technical changes is to ensure collected recyclable materials are of a sufficiently high quality. BSA members have been leading the way on waste resource management both in terms of improving their own performance and on behalf of clients. Accompany statutory guidance outlining the quality criteria should be drafted in order to encourage the market to identify opportunities to improve recycling quality further still.

Improving the market for recycling services

10. As part of the above review, Defra is seeking views on how to make the market for recycled services work more effectively. We understand there are concerns that the market is not improving the quality of recycling collections as effectively as it could and that there might be additional government levers to help stimulate the market.
11. Stability and continuity are the key factors that help promote an effective working market for recycling services. With sufficient certainty on future trends in the market and the regulations that will apply, companies are able to make long-term investments to deliver more effective services to the public. This in turn should help increase recycling rates.