

Review of Waste Recycling Performance – Torfaen County Borough Council

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Contents

The Council's overall waste recycling rate is poor and, whilst it understands the underlying reasons, urgent decisions and robust plans are needed if it is to drive improvements in service delivery, meet current and future statutory targets and provide assurance to its key stakeholders.

Summary report

Summary	4
Recommendations	6

Detailed report

The Council's overall waste recycling rate is poor and, whilst it understands the underlying reasons, urgent decisions and robust plans are needed if it is to drive improvements in service delivery, meet current and future statutory targets and provide assurance to its key stakeholders	8
--	---

The Council understands the underlying reasons for its poor overall waste recycling performance and the barriers to improvement that it needs to overcome	8
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The Council has taken some actions to improve, but if it is to improve its overall recycling performance at the pace and scale required, urgent decisions are needed in relation to its service change proposals	10
--	----

The Council has developed an appropriate framework of arrangements which should enhance its ability to monitor and report performance	13
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The Council has yet to develop a sufficiently robust action plan to drive improvements in service delivery and monitor progress towards improving its overall recycling performance and provide assurance to its key stakeholders	14
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Appendices

Appendix 1 – Beyond recycling	16
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Summary report

Summary

What we reviewed and why

- 1 We reviewed whether Torfaen County Borough Council (the Council) understands the reasons for its waste recycling performance and has robust plans to meet current and future statutory recycling targets. We looked at how the Council understands its current position and how that might change over time, its intended actions to improve recycling performance, and how it monitors, reviews and evaluates the effectiveness of its progress. This review did not examine in detail all the waste management services provided by the Council.
- 2 In 2015, Audit Wales reviewed the waste service at the Council and, in particular, whether the Council was capable of delivering its waste management services resulting in improved outcomes for citizens. At that time, we concluded that due to a fragmented strategy, a lack of resources, unclear accountabilities and poor challenge, it was not clear whether the Council could sustainably improve outcomes through its Waste Management Service. We issued nine proposals for improvement¹.
- 3 In 2018, we completed a follow-up review to assess whether the Council had effectively addressed our proposals for improvement to facilitate sustainable improved outcomes for waste management. We concluded that the Council had made slow progress in addressing our proposals for improvement and some significant issues remained, but performance had improved and there was renewed pace and focus on achieving sustainable improvements in the waste service.
- 4 On 9 April 2019, Cabinet approved the Recycling and Waste Strategy 2018-2025². Waste is a key part of the Clean and Green priority identified within the Council's Corporate Plan 2016-21. The vision is to provide cleaner and greener communities and a sustainable local environment that residents can be proud of. The strategy and summary action plan³ cover the period when the statutory target for the 'Percentage of waste reused, recycled or composted' increases to 70% in 2024-25.

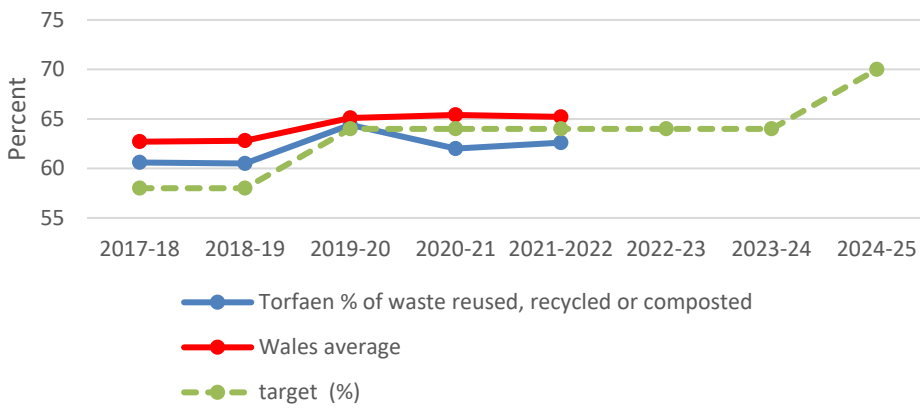
¹ Audit Wales, Torfaen County Borough Council: Service Assessment of Waste Management, June 2015

² Recycling and Waste Strategy 2018-2025

³ Strategy Summary Action Plan and Timeline

Exhibit 1: the Council’s recycling performance

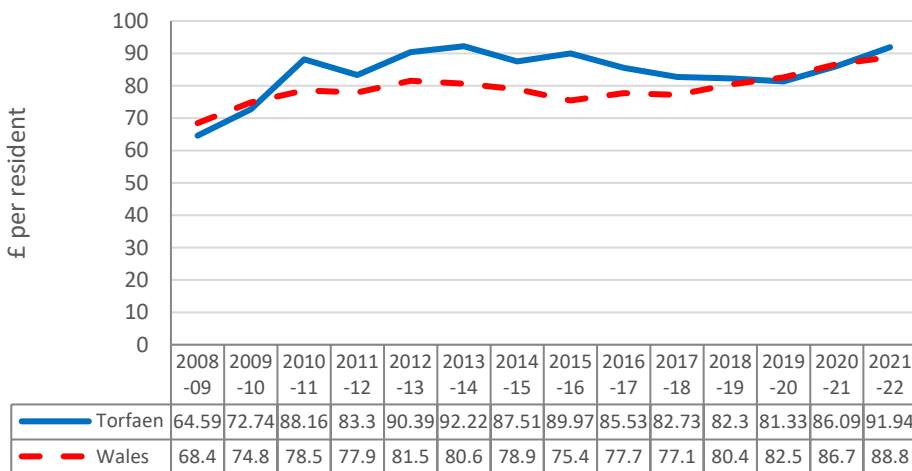
The Council met the 64% statutory target in 2019-20 but has, since the onset of the pandemic, struggled to maintain and build on that momentum, and performance has subsequently declined below target standing at 62.6% for 2021-22. As context, five other Welsh councils also failed to meet the statutory target for 2021-22.



Source: Annual reuse/recycling/composting rates by local authority (gov.wales)

Exhibit 2: the Council’s waste net revenue expenditure per resident

As context, in 2021-22, the Council’s net revenue expenditure for waste and recycling was £8.7 million. Its expenditure per resident has increased over time and has been maintained generally above or at the Wales average over the period since 2008-09 until 2021-22.



Source: Welsh Government, Stats Wales

- 5 Our findings are based on document reviews and interviews with a selection of officers and executive members. We undertook the review during the period November 2022 to March 2023.

What we found

- 6 Our review sought to answer the question: Does the Council understand the reasons for its recycling performance and have robust plans to meet current and future statutory recycling targets?
- 7 We found that: the Council's overall waste recycling rate is poor and, whilst it understands the underlying reasons, urgent decisions and robust plans are needed if it is to drive improvements in service delivery, meet current and future statutory targets and provide assurance to its key stakeholders.
- 8 We reached this conclusion because:
- the Council understands the underlying reasons for its poor overall waste recycling performance and the barriers to improvement that it needs to overcome;
 - the Council has taken some actions to improve, but if it is to improve its overall recycling performance at the pace and scale required, urgent decisions are needed in relation to its service change proposals;
 - the Council has developed an appropriate framework of arrangements which should enhance its ability to monitor and report performance, and
 - the Council has yet to develop a sufficiently robust action plan to drive improvements in service delivery and monitor progress towards improving its overall recycling performance and provide assurance to its key stakeholders.

Recommendations

Exhibit 3: recommendations

The table below sets out the recommendations that we have identified following this review.

Recommendations	
Taking urgent decisions	
R1	To improve its recycling performance at pace the Council must take urgent decisions on its proposals to improve service without delay.

Recommendations

Developing and monitoring action plan

- R2 The Council should develop a consolidated, detailed, costed and measurable action plan. The action plan should contain sufficient and appropriately SMART measures and milestones to manage delivery of the improvements and enable effective monitoring and evaluation.
- R3 Monitor and evaluate progress in delivering the Action Plan and its impact upon recycling performance, and utilise existing arrangements to ensure appropriate scrutiny, challenge and assurance reporting enables an understanding of whether intended benefits are being realised.

Detailed report

The Council's overall waste recycling rate is poor and, whilst it understands the underlying reasons, urgent decisions and robust plans are needed if it is to drive improvements in service delivery, meet current and future statutory targets and provide assurance to its key stakeholders

The Council understands the underlying reasons for its poor overall waste recycling performance and the barriers to improvement that it needs to overcome

- 9 The Council understands its recycling performance and has drawn on a range of information to understand its current position. For example, it has collaborated with industry experts Waste & Resources Action Programme (WRAP) to gain in-depth evidence of the county borough's waste composition. It has also gathered comparative information on recycling performance and the service design of other local authorities in Wales and in England.
- 10 Torfaen County Borough produces high amounts of residual waste, over 21%⁴ more than the best-performing local authority in Wales. The Council has identified the main reasons for its poor overall recycling performance.
 - composition analysis reveals that 40% of the residual waste contains food waste that could and should be diverted to the recycling stream.
 - the Council operates a 'two pass' recycling collection. This means that it has separate vehicles collecting dry recyclables, and food waste and cardboard. It has been identified that this food waste and cardboard collection method results in the contamination of a proportion of the cardboard which therefore cannot be recycled.
 - in addition, breakdowns and failures due to the ageing recycling vehicle fleet used to collect food and cardboard have adversely impacted on service performance. This is also likely to have negatively impacted on residents' satisfaction with the service. The number of complaints relating to the waste service increased in 2021-22, with the majority of complaints relating to recurring missed collections.
- 11 The Council has recently reviewed and strengthened its approach to risk management and has appropriate arrangements in place to identify and manage risks in relation to its waste services operational delivery and ultimately its waste

⁴ Torfaen County Borough Council: [Recycling Performance: Deep Dive, cleaner overview scrutiny committee \(page 10\)](#), 9 February 2023

recycling performance. Officers maintain project level risk registers, that are presented to members at various stages of its governance process such as to the Waste Project Board.

- 12 Some of the key risks that may impact adversely on the Council's waste collection and recycling arrangements, and which it is actively seeking to manage and mitigate include:
- the suitability and sustainability of the Tŷ Coch waste transfer facility site;
 - potential slippage in timescale for delivery of the capital works required at Tŷ Coch to support revised operations and improve recycling performance;
 - affordability of capital works in future financial years, should slippages in delivery be encountered;
 - workforce capacity and resilience to implement changes and sustain service delivery;
 - decision-making – any unnecessary or unforeseen delay in obtaining approval to implement its proposals eg changes to the residual waste collection arrangements; and
 - a lack of correct recycling behaviour of residents⁵.
- 13 Trade waste recycling rates are included in the Council's overall recycling performance. The Council provides residual waste collection for around 560⁶ customers. It also offers recycling collections to all trade waste customers. Currently, the waste collected for reuse, recycling or composting from trade waste contributes approximately 12%⁷ to the overall recycling performance.
- 14 Understandably, the Council is focussed upon addressing its current waste recycling challenges and driving the improvement actions necessary for it to achieve the targets set by the Welsh Government. The Council recognises that significant and immediate service changes are required if it is to move at pace towards the 70% overall waste recycling rate already set for 2024-25. It is also seeking to manage and mitigate the identified risk that the Welsh Government can impose significant financial penalties upon local authorities that fail to meet the statutory targets.

⁵ The Council carried out a resident survey as part of a Food Waste Recycling Project which identified that greater knowledge and information and more resources could positively influence food waste recycling rates.

⁶ Recycling and Waste Strategy 2018-2025

⁷ Stats Wales, [Non-household waste collected for reuse/recycling/composting by local authority](#)

- 15 Nevertheless, the Council is aware of and considering several key factors that will impact upon its models of service delivery and waste recycling performance into the future. Some of these factors are relatively clear, whilst, for some, the detail and scale of their potential impact are not yet clear or known. To inform its consideration, at a local level, the Council has drawn on information on housing growth in its Local Development Plan (LDP) and its own wealth of Waste Data.
- 16 These key factors include:
- the likely further increase in Welsh Government waste recycling targets to meet its ambition for Wales to have zero waste by 2050;
 - Beyond recycling⁸ – the Welsh Government’s strategy to make the circular economy in Wales a reality [see **Appendix 1**] – which aims to keep resources and materials in use for as long as possible and avoids all waste;
 - the introduction of the Deposit Return Scheme (DRS)⁹ which may impact upon the amount of recyclable material presented at kerbside;
 - impending Welsh Government regulations for Trade Waste¹⁰ will require all businesses, the public sector and third-sector organisations in Wales to separate recyclable materials in the same way that most householders do now.

The Council has taken some actions to improve, but if it is to improve its overall recycling performance at the pace and scale required, urgent decisions are needed in relation to its service change proposals

- 17 The Council’s Recycling and waste integrated strategy 2018-2025 (the strategy) set out a clear vision to ‘provide cleaner and greener communities and a sustainable local environment that residents can be proud of’. Contained within the strategy are six objectives and a high-level action plan for the Council to reach the 70% statutory recycling target by 2025 and to work towards compliance with the Welsh Government’s Collections Blueprint.¹¹ The six objectives are:
- Engagement First
 - Recycling for Everyone

⁸ Welsh Government, [Beyond Recycling – a strategy to make the circular economy in Wales a reality](#), March 2021

⁹ Through the DRS, consumers are charged an additional deposit fee when they purchase a drink in a single-use container. This deposit acts as an incentive to support recycling – it is redeemed when the consumer returns the empty container to a return point.

¹⁰ Welsh Government, [Separated waste collections for business, public sector and third sector organisations](#), April 2023

¹¹ Welsh Government, [Municipal Sector Plan Part 1: Collections Blueprint](#), March 2011

- Collaboration
- Minimise Waste
- Continuous Improvement
- Fair Enforcement

- 18 In relation to the strategy, the Council has already taken some actions to improve. It has used its evidence base (referred to in **paragraph 15**) and other sources to identify proposals that are likely to be the most effective. For example, under its objective Recycling for Everyone, in February 2022, the Council approved the procurement of new vehicles to replace its ageing fleet. This is to ensure a reliable recycling collection service to residents and to comply with Welsh Government's Collection Blueprint. Although delays were experienced in relation to delivery of the new vehicles, they have all now been delivered. These new vehicles will enable the collection of all recycling by one vehicle at the same time (one pass). This should result in improved cardboard quality as residents will be required to separate food and cardboard. Also, textiles and small electrical items can be presented at kerbside for collection. However, although the new vehicles are being utilised, the one pass arrangements are unlikely to be implemented before September 2023.
- 19 The Council introduced black bag sorting at its Household Waste Recycling Centre (HWRC). This requires residents to sort the contents of their residual waste to promote further recycling of materials. It has led to increased recycling and a reduction of 66% in the amount of residual waste presented at the HWRC.
- 20 The Waste and Recycling service is considering how it can integrate its work with that of their colleagues across the Council. For example, it has considered opportunities for preventative projects that link into the Council decarbonisation strategy.
- 21 The Council has several partners it collaborates with, for example, it works with third sector partners to provide a Repair café and Re-use shop. This partnership has diverted thousands of items from landfill to be re-used or recycled. It also has a partnership with Capital Valley Plastics to recycle stretchy plastic into new products.
- 22 However, these improvement actions alone have been insufficient to drive the scale of improvement needed to the overall recycling rate. The waste and recycling service has experienced pressures on its workforce capacity for some time. Coupled with the impact of the pandemic, it has hindered the Council's ability to progress elements of the strategy. For example, planned actions in relation to the 'Engagement First' and 'Collaboration' objectives have not sufficiently progressed.
- 23 The Council recognises it needs to proceed to develop and implement a robust engagement, communications, and outreach plan to engage and promote recycling with residents and other stakeholders to contribute to improved performance. Change proposals can lead service users to think that services are being taken away from them, when in reality changes will lead to more services, just less residual waste. Involving communities will be key to taking forward waste

prevention and reduction initiatives and to achieve its ambition to meet the 70% recycling target.

- 24 The Council has reviewed its arrangements for segregated recycling and residual waste collections. In collaboration with WRAP, the Council has developed proposals for its residual waste collection service and enforcement to maximise recycling yield. There has been extensive modelling and costing of the proposals and a clear options appraisal developed. The modelling work shows that to get closer to the 70% recycling target the Council will need to reduce and/or restrict the amount of residual waste residents present for collection.
- 25 The Council has considered the financial implications of its proposals and is allocating financial resources for capital funding of infrastructure projects such as those it proposes at its waste transfer facility, and others designed to provide capacity and ease service pressures.
- 26 In February 2023, a report was presented to the Cleaner Communities Overview and Scrutiny Committee¹², detailing the options. We observed the meeting and noted that, although intended, in the event there was limited scrutiny or challenge in relation to the residual collection options as presented. Whilst officers perceived that the outcome helped strengthen the overall process and improved the level of engagement, in our view, the scrutiny committee's impact can be further strengthened through more effective challenge.
- 27 Given the potential impact of its service proposals on residents, the Council is planning to consult on the options with a diverse range of the population to inform its final proposal to Cabinet. The consultation period was scheduled to commence in late February 2023, but has been delayed.
- 28 Our review has identified that there are a number of significant infrastructure and service change proposals that are crucial to the Council's implementation of the strategy and to it overcoming identified barriers to performance improvement. We conclude that if the Council is to improve its overall recycling performance at the pace and scale required, urgent decisions are needed in relation to its service change proposals.
- 29 Until such decisions are taken, the Council cannot plan effectively to meet the statutory recycling targets let alone shift its focus beyond the targets to how its approach to waste can contribute to longer-term ambitions around the circular economy and the wider social, economic and environmental goals contained within the Council's broader objectives.

¹² [Cleaner Communities Overview and Scrutiny Committee](#)

The Council has developed an appropriate framework of arrangements which should enhance its ability to monitor and report performance

- 30 The Council has put arrangements in place to support monitoring and review of its strategic progress and overall recycling performance. The Council has a Waste Project Board which oversees the development of the waste transfer facility and residual collection as well as other projects such as digital vehicle technology, rerouting of waste and collection rounds. The Waste Project Board has a comprehensive membership that includes colleagues from other parts of the Council, for example, Finance, Portfolio Management Office (PMO), and Communications.
- 31 There has been regular reporting to members on specific elements of the strategy's high level action plan. For example, it sought approvals to support a preferred location for a waste transfer facility; a new leadership structure for the waste and recycling service, and the procurement of a new recycling vehicle fleet.
- 32 The Council has also involved members in discussion on waste recycling performance and proposals for improvement through member seminars, providing appropriate opportunity for questions and challenge.
- 33 The Council has costed many of its proposals, but the information in relation to costs and necessary investment is fragmented. This makes it difficult for senior leaders to have oversight of the financial information to be able to make informed decisions.
- 34 The Council's new Performance Management Framework (PMF) has arrangements for quarterly reporting to Leadership team and Policy Development Forum. Once arrangements are embedded, regular performance reports will be taken to Cabinet and scrutiny.
- 35 The PMO supports the waste and recycling service with the planning, initiation and delivery of programmes, and key projects such as the Tŷ Coch waste transfer facility and residual waste collection changes, to seek to ensure that they are well-delivered and to maximise positive outcomes. It monitors progress of the projects through monthly meetings where highlight reports are presented to help identify and prioritise any issues as they arise.
- 36 Based upon the findings of our work with the Council, we are satisfied that it has developed an appropriate framework of arrangements which should enhance its ability to monitor and report performance. Although relatively new, the Council has begun embedding these arrangements and is reviewing their effectiveness and scope for development with each iteration, for example, quarterly at Policy Development Forum.

The Council has yet to develop a sufficiently robust action plan to drive improvements in service delivery and monitor progress towards improving its overall recycling performance, and provide assurance to its key stakeholders

- 37 The Council understands the underlying reasons for its poor overall waste recycling performance and the barriers to improvement that it needs to overcome. It is also able to articulate key workstreams that it is either progressing or proposes to commence subject to key decisions that are still to be taken.
- 38 It has, in the main, identified the revenue and capital costs associated with these workstreams and made provision for those costs, either by its own means or with the financial support of the Welsh Government. Although, as mentioned previously, this information is currently fragmented.
- 39 Officers have told us that these workstreams, when delivered, will lead to a positive contribution towards improving overall recycling rates. We are assured by the evidence gathered during this review that the research, expert analysis, Welsh Government guidance and identified good practice support the Council's selection and pursuit of its chosen workstreams. However, apart from the residual waste collection options we note that the measure of the individual workstream's positive contribution is not quantified, either individually or collectively. Nor can we see that the workstreams are drawn together by means of a consolidated action plan, and therefore the overall timeframe for their intended completion is unclear.
- 40 Given the strategic importance of the Council's Waste Strategy, together with the significant risks associated with any continued failure to improve overall recycling performance, we consider this to be a situation that requires the Council to develop a consolidated, detailed, costed¹³ and measurable action plan. The action plan should contain sufficient and appropriately SMART measures and milestones to enable effective monitoring and evaluation, and in particular of:
- progress towards completing planned actions to set time and quality standards;
 - any barriers encountered and mitigating actions considered necessary;
 - planned and actual impact of actions on overall recycling performance;
 - financial performance in relation to budget/sustainability/value for money, and
 - broader impacts relating to social, economic, environmental and cultural wellbeing.

¹³ The plan should detail all the resources required for success in terms of £s, people resources and assets.

- 41 Carrying out, monitoring and reporting the Action Plan and its evaluation will be key, not only to the Council taking forward its plans and achieving the desired impact on its overall recycling performance, but also to providing the necessary assurance to its citizens, the Welsh Government, and other stakeholders.

Appendix 1

Beyond recycling

Exhibit 4: Making the circular economy a reality in Wales – the Welsh Government’s aim is to keep resources in use for as long as possible and avoid waste





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