



Municipal Waste Recovery Targets, Wales

A Case Study

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Context

Zero Waste Scotland undertook research into the development, implementation, and delivery of municipal waste recovery targets in Wales, and produced a case study of the findings. Research was conducted during 2022 and 2023, and thanks go to the Welsh Government¹, for their input and support during the process. The content below sets out the journey that Wales has been on in terms of setting and using targets to support performance improvements and provides insight for stakeholders interested in this approach.

Current targets overview²

Wales has had statutory minimum municipal waste recovery targets in place for the last ten years (refer to Table 1). They were set in the Wales (Waste) Measure 2010 (equivalent to an Act) and the mechanism for reporting and monitoring was established under the Recycling, Preparation for Re-use and Composting Targets (Definitions) (Wales) Order 2011 and The Recycling, Preparation for Re-use and Composting Targets (Monitoring and Penalties) (Wales) Regulations 2011. The targets do not vary by local authority and apply to local authority collected municipal wastes.

Table 1: Municipal Waste Recovery Targets, Wales

	2012-13	2015-16	2019-20	2024-25
Local Authority Municipal Waste Recovery Targets	At least 52%	At least 58%	At least 64%	At least 70%

In addition to the “typical” local authority collected municipal wastes, accompanying guidance defines whether specific waste types are to be included as local authority municipal wastes:

- Exclusions - Home composting, abandoned vehicles
- Inclusions (in some cases under certain conditions) – Soil and rubble, beach cleansing wastes, plasterboard, Incinerator Bottom Ash (IBA), Air Pollution Control Residues (APCR, aka “fly ash”), Tyres, Clinical and Hygiene wastes, Road sweepings and gully wastes, Asbestos

The differences in the way recycling rates are measured across the UK, including in Wales, are explained here: [Local Authority Waste Statistics](#)

Within scope wastes must undergo a reprocessing recovery operation to produce a product, substance, or material, or in the case of organic wastes undergo composting or anaerobic digestion to produce a product, substance or material that is capable of use as a soil conditioner, fertiliser or growing medium. In both cases the material must have ceased to be waste. Any rejects/contamination are required to be netted off the reported recycling figures.

¹ Specific thanks go to Dr Andy Rees, Head of Waste Strategy, for his time and his knowledge.

² All supporting information taken from <https://gov.wales/sites/default/files/publications/2020-02/guidance-made-under-section-7-of-the-waste-measure-2010-in-support-of-local-authority-recovery-targets.pdf>

An earlier non-statutory 40% recycling target for 2010

In 2000 the Welsh government were looking at implementing the landfill directive target to divert biodegradable municipal waste from landfill. The Welsh Government at the time was very supportive of the role of recycling, and keen to minimise the incineration of waste. Therefore, the primary focus of policy development to deliver against the landfill directive was significant improvement to the recycling of biodegradable municipal waste. Quantitative modelling highlighted the key role improved capture of food waste would have to play.

In 2002 the Welsh government set local authorities a 40% recycling target for 2010, of which no less than 15 percentage points of the total recycling should be comprised of organic waste (i.e. 15% of the total municipal waste should be composting). Options considered included a higher 60% level, but analysis suggested 40% to be more realistic for 2010. A key implication of this target was local authorities would have to roll out food waste recycling services. Welsh government provided financial support via a Sustainable Waste Management Grant to local authorities for the roll out of new recycling services (i.e. bins, communications etc), including an additional £23 million per annum ring fenced for weekly separate food waste collections. The target was not statutory, but some local authorities adopted the target within their suite of best value performance indicators. It is understood that during the mid-2000's one local authority did get fined for failing to meet the target, under the best value regime at the time. During this period the Welsh government also spent time looking at Milan (for food waste collections) and Flanders (on 70% recycling), to understand how they have achieved very significant uplifts in recycling performance.

Development of the current statutory target from 2007

In 2007 part of the development of a new waste strategy led to the three "future directions" policy documents that were worked up in collaboration with local government. Some local authorities were starting to look at incineration to divert biodegradable municipal waste from landfill, in some cases potentially sending up to 60% of collected municipal waste to incineration. This prompted further consideration of how to incentivise a further focus on recycling through a new set of targets.

Quantitative analysis to support target development with local authorities

Prior to engagement with local authorities to discuss a new recycling target, quantitative analysis looked at the impacts of a new target set at 60, 70 and 80% in terms of tonnage, cost and carbon. The 80% level was deemed too expensive owing to an assumption to require a second collection vehicle pass for dry recyclables. The 60% level was assessed as more expensive than 70% and achieved lower emissions savings. A 70% level was ultimately adopted on the grounds of both cost and carbon. Target scope was defined as municipal waste collected by local authorities, as it was felt this would incentivise performance uplift for the trade wastes collected by local authorities³.

Engagement and development with local authorities

The targets were set following extensive consultation through the Future Directions papers, consultation on *Towards Zero Waste* and the Municipal Sector Plan. Following quantitative

³ It was suggested that the non-household municipal waste collected by local authorities in Wales made up in the region of 10-20% of non-household municipal waste in total.

analysis, formal engagement and negotiation with local authorities was carried out via the Welsh Local Government Association (WLGA), sub-groups and individual local authority meetings (e.g. Directors, Cabinet Members). Discussion focused on target scope and the level of support that would be provided to local authorities by Welsh government.

On target scope, concessions included allowing incinerator bottom ash, rubble, and street sweepings within the scope of the target. To manage risks of perverse incentives to collect heavy wastes and inaccurate reporting of these waste streams the Welsh government highlighted to local authorities that performance would be closely monitored in respect of how much reliance was being placed on the recycling of these items, and that their inclusion in the future was not a given. Wilful miss-reporting of data is liable to a fine. Welsh government analysis for local authorities also highlighted there is a mathematical ceiling to the amount of waste that can be sent to incineration and therefore contribute to the target via incinerator bottom ash.

Setting performance levels across Wales

The Welsh government's starting position was that everybody in Wales had an equal right to a good recycling service. Quantitative analysis looked at potential uplifts in performance in rural, valley and urban authority groupings. It was judged that each type of authority has different potential ways of meeting the target and there were no justifiable reasons to set differential targets. Each local authority therefore was set the same performance level, irrespective of their performance at the time. Differential performance has been an issue that Welsh Government have regularly discussed with the Wales audit office.

Discussions around service design

A significant area of discussion was on service design. Key analysis carried out via the waste improvement programme (based in the WLGA, funded by Welsh Government) included the relative costs of kerbside sort versus comingled recycling services. The Welsh government position being that kerbside sort would produce better quality recycling, but it was decided not to mandate a specific service type within regulations and instead issue non-statutory guidance – the 2011 Collections Blueprint – advocating a best practice service based on multi-stream kerbside sort. The design and performance of food waste services was also discussed at length being supported by pilot funding and sharing best practice.

Welsh Government support to local authorities

In developing the current minimum targets, the required local authority support for performance improvement was also discussed and identified. Financial support included continuation of the Sustainable Waste Management Grant, capital funding to pay for whole service changes and more bespoke funding for trials or similar. Financial (revenue) support via the SWMG was allocated using the standard spending assessment formula, and peaked at around £72 million in 2014. Funding based on performance was not judged appropriate. Capital funding was allocated based on supporting the policy objective of high-quality recycling aligned to the Blueprint and therefore tended to go to local authorities who were using kerbside sort collections. Local authorities who ran comingled dry recycling services have however been supported for service improvements at household waste recycling centres.

Two other factors helped Local Authorities plan and deliver targets. The first was Welsh Government funding of periodic residual municipal waste compositional analyses that helped

calculate current capture rates for recyclable materials, and where there was a need to do more to increase capture rates. Secondly the Welsh Government funded the setting up of Waste Awareness Wales in the WLGA, and also funded a £3 million TV advertising recycling campaign that ran from 2007-2009. The Welsh Government has continued to fund recycling awareness and behaviour change campaigns, now led by WRAP Cymru through 'Wales Recycles'. More recently the 'Be Mighty' campaign, co-ordinated on a national and Local Authority basis, has been successful at maintaining recycling rates in Wales during the pandemic, with a key focus on food waste recycling. The recent municipal waste compositional analysis commissioned by WRAP Cymru for 2020 shows continued improvements in both dry recycling and food waste capture, and a reduction in the proportion of easily recyclable waste in the residual stream that mostly goes to energy recovery.

During the period 2002 to around 2020 Welsh Government has invested over £1 billion in funding to Local Authorities. In their most recent review⁴ the Wales Audit Office provided a detailed review of investment and service costs. The Welsh government have looked at whether a realistic counterfactual (i.e. what would have happened in the absence of the target) could be developed but it proved very challenging.

Quantitative performance analysis and benchmarking to identify areas for individual local authority improvement has been significant throughout the period of target implementation up to the present day. This has been facilitated by the collaborative change programme, and by the WLGA based waste improvement programme in carrying out performance reviews for the local authorities and analysis for over a decade of the cost data that all the local authorities report via WasteDataFlow.

A materials marketing programme to help local authorities obtain the best price for high quality recycling materials has also been supported by the Welsh Government, run through the Collaborative Change Programme. This programme also operates the My Recycling Wales website⁵ that shows to the public the end destinations of key recyclables reported on WasteDataFlow by each local authority.

There was significant engagement with local authorities required by Welsh government underpinned by a strong understanding of the technical and practical running of local authority services. Providing clear answers to local authority questions and concerns was always required. In addition, when individual local authorities have struggled to meet target milestones, Welsh government has provided dedicated technical and financial support through the collaborative change programme.

Welsh Government working relationships

The Welsh government were supported by consultancies for both quantitative analysis and expertise and advice on policy developments in Europe. Good working relationships were also established with Waste Awareness Wales, funded by the Welsh Government, and located in the WLGA. WRAP Cymru then took this over as 'Wales Recycles'. A waste improvement programme was established within the WLGA, with a particular focus on financial and performance benchmarking. The Waste Treatment Procurement Programme was set up to

⁴ https://www.audit.wales/sites/default/files/Municipal-Recycling-eng_6.pdf

⁵ <https://myrecyclingwales.org.uk>

support local authorities in procuring contracts for the AD of food waste and EFW of residual waste.

Setting target milestones, monitoring, reporting and wider scrutiny on progress

The target milestones for 2012-13, 2015-16, 2019-20 were set based on a straight line towards 2024-25. To support local authority reporting and target monitoring, changes to waste data flow were implemented (especially 'Question 100') and Natural Resources Wales (NRW) were given additional funding as the legal 'Monitoring Authority' for the statutory recycling targets. Local authority reporting is quality assured by NRW and cross referenced with other datasets. Examples of improvements to the way in which fate of waste is reported include wood wastes sent to incineration that had previously been reported as recycled. NRW provide a data quality report for the Welsh Government. There are provisions for financial penalties for incomplete or incorrect reporting. The Wales audit office have carried out three separate reviews of progress in this area between 2005 and 2018⁶⁷⁸.

There is a commitment in *Beyond Recycling* to work with Local Authorities to develop future higher recycling targets post 2025, on a trajectory towards zero residual waste by 2050.

Financial penalties for not meeting targets

The regulations established the ability for Ministers to set fines where targets had not been met or where reporting was not completed. Fines can either be levied at the specified level or waived, meaning no provision was made to vary the level which could have proved useful in some circumstances. For each target milestone year an established protocol is followed where a local authority has not achieved the target. This commenced with the Local Authorities in question being written to and asked to explain the reasons why they failed to meet the target. Local authorities then meet with officials and the lead Minister to discuss the evidence provided and the actions being taken to ensure the Local Authority returns to compliant performance levels. Criteria are used to assess whether a fine will be levied, including whether the local authority has a clear improvement plan. In the operation of the regime fines have been seen as a last resort with the emphasis placed on supporting the authority to improve performance to the required levels. It has been suggested that the potential for a financial penalty alongside the statutory duties has had a positive impact on the prioritisation of waste service budgets.

The most recent target milestone

The 64% 2019-20 target milestone was achieved by eighteen of the twenty-two local authorities in Wales. One local authority has been set a fine. Quality remains a priority and it is worth noting the top performing authorities all provide kerbside sort and the majority of authorities follow the Blueprint.

Recent developments to support target progress

Local authorities are continuing to further restrict residual waste capacity through changes to collection frequency, bin size or bag number that has been a feature for several years. One local authority has issued large numbers of letters to households to enforce the use of recycling

⁶ Waste Management – a challenging agenda for the Welsh public sector: Themed Paper No. 9, Audit Commission in Wales, March 2005

⁷ <https://www.audit.wales/publication/public-participation-waste-recycling>

⁸ https://www.audit.wales/sites/default/files/Municipal-Recycling-eng_6.pdf

services, and a number of other local authorities engage in enforcement. It is solely the decision of local authorities to charge for garden waste services and use of household waste recycling centres. The Welsh Government have always made it clear that it is the individual local authority who decides on the above approaches.

Further improving the capture of food waste remains a challenge and further work on this topic is ongoing.

The Welsh Government continues to provide significant support to help Local Authorities meet current and future targets. Joint working has been set up with Local Authorities on new waste streams for recycling (for example AHPs/disposable nappies) and with Local Partnerships support on identifying the new infrastructure needed, as well as support for strategic planning by the Local Authorities to inform the infrastructure improvement. New joint working arrangement and governance have been set up – including a national and regional Ministerial Programme Boards. The Welsh Government continues to fund work by WRAP Cymru and the WLGA to support technical and financial performance benchmarking and improvements in the Local Authorities' recycling services, including the updating of the key evidence bases. The Welsh Government is also bringing in reforms to workplace recycling to ensure a consistent approach across Wales to the separate collection of recyclables from non-domestic premises, and is supporting Local Authorities in getting their trade waste collection services compliant when the new requirements come in on 6 April 2024.

Future targets and indicators

The Welsh government are considering the next minimum recycling targets beyond 70% and has in recent years carried out modelling on how that could be done and begun engagement with Local Authorities. It has set the ultimate goal of zero waste for 2050, which means no residual waste (and hence 100% preparation for reuse, composting and recycling) and new targets will therefore need to be aligned with the trajectory needed to achieve it. A new waste composition analysis programme was undertaken in 2022 and has been published. The results from that work will feed into updated analysis. It's likely that any new target will be supported by a mix of indicators, including wastes from households recycled and a carbon metric, along the lines of the one developed in Scotland.

The Welsh government have considered the adoption of a statutory carbon-emissions targets for waste, but it was felt this could be problematic (e.g. issues with inconsistencies with monitoring and measurement).

In parallel via the Environment (Wales) Act, the Welsh Government brought forward legislation to put in statutory carbon budgeting for Wales. This includes both a waste sector target and targets for other sectors which require action to move to a circular economy, with the actions against each sector being set out in *Net Zero Wales*.

In terms of future monitoring systems, waste tracking could help improve the accuracy of data provided there was no loss of current functionality in waste data flow.

Summary: Key points

A performance improvement culture was likely already in place prior to the introduction of the current (2025) target in 2011. The current Wales target was developed during the period 2007 and 2011, but an earlier (non-mandated) recycling target of 40% had been set for 2010. Ministerial ambition during the early 2000's was significant and there had been at least one example of a local authority being fined for missing this earlier target.

The current target required approximately four years to go from initial scoping and discussion to implementation. There was significant, lengthy discussion with local authorities during the development phase on the scope of the target, the support required from Welsh government and how it would be monitored. Engagement and a partnership approach to delivery with Local Authorities has been a key feature ever since.

Quantitative analysis of costs and potential performance uplift was key analysis to support target development and implementation with local authorities. Learning from elsewhere and developing and promoting best practice were also features as the target was developed and following its implementation.

Financial support has been very significant, but ways of working and other types of support, such as for the end-to-end change management support for delivery of service improvement, have been equally important. In addition to significant financial support prior to and during the target period, the Welsh government established a structure of support for local authorities, including quantitative analysis, technical advice, a collaborative change programme and public communication campaigns. Persuasion and collaboration have been important ways of working.

Supporting regulations made provisions for financial penalties for missing targets. However, these have been applied sparingly with the emphasis placed on developing a culture of collaborative performance improvement since target inception.

There may be opportunities to follow up on specific topics in more detail. The Wales Audit office have carried out extensive reviews in this policy area which have been published. The Welsh government identified additional contacts in government to discuss in more detail the application of penalties, and in Natural Resources Wales to discuss target monitoring.



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