

# **Delivery of an Integrated Waste Management Strategy**

## **Report by Director of Environment and Infrastructure**

#### SCOTTISH BORDERS COUNCIL

#### **12 December 2013**

#### 1 PURPOSE AND SUMMARY

- 1.1 This report proposes that Scottish Borders Council agrees the Scottish Borders Integrated Waste Management Strategy (IWMS) and agrees the resultant recommendations proposed for the new mandatory food waste collection service, the non-mandatory kerbside garden waste collection service and Community Recycling Centre (CRC) Provision.
- 1.2 In order to achieve the requirements of the EU Directive, Zero Waste Plan and the Waste (Scotland) Regulations 2012 the Council must review its existing waste services. This will ensure that, in the future, its service provision provides a sustainable basis on which to comply with the regulations.
- 1.3 The implementation of an Integrated Waste Management Strategy will provide clear strategic direction for municipal waste management in the Borders through to 2025. The Strategy will be used to inform decision-making and assist in delivering a waste service that is 'fit for purpose' and both financially and environmentally sustainable in the long term.
- 1.4 The IWMS has been identified as a key Business Transformation Project which is programmed to save £800k by 2017/18, contributing significantly to the £28 million savings target the Council has over this period.
- 1.5 The IWMS will be delivered via an action plan where individual projects have been assessed and grouped into high, medium and low priority.
- 1.6 It is deemed necessary to consider all services provided, identify any non-mandatory services provided in order to review and identify potential areas where budget savings can be made. This will ensure the Council is able to continue to maintain mandatory service provision across the area.
- 1.7 This report provides an update of the service reviews undertaken so far and proposals for the future delivery of the first three high priority service areas the new mandatory requirement for the introduction of food waste collection services, the current non-mandatory garden waste collection service and CRC provision. These options demonstrate how contributions could be made towards achieving the agreed £800k savings required from

the IWMS as part of the Council's wider Business Transformation Programme.

- 1.8 A high level review of the distribution, number and location of Community Recycling Centres (CRCs) has been undertaken. It indicates that all settlements with a population above 1,500 are within a 10 mile radius of a CRC except Kelso. A new CRC in Kelso is proposed. All CRC opening hours will also be reviewed along with access policies, with particular attention being given to trade access.
- 1.9 Minimising waste and encouraging re-use and recycling fall within Corporate Plan Priority 5, Maintaining and improving our high quality environment. Scottish Borders Council remains committed to engaging with the public and communities:
  - to maximise waste reduction, reuse and recycling
  - to ensure there is wide-spread understanding of the need for service reviews and prioritisation and the resultant difficult decisions that may have to be taken
  - to ensure comprehensive advertising, PR and householder engagement is undertaken during any period of new service introduction or removal.

Communications and awareness raising work with our communities has always been a key priority and has been undertaken on a wide scale in previous years. This will be increasingly important in the future.

- 2.0 A comprehensive communications plan has been developed and is ready to be implemented immediately. This aims to raise awareness of the need for an Integrated Waste Management Strategy, maximise awareness of service priorities and pressures and manage service changes as successfully as possible. This plan will be regularly reviewed in order to support householders through all future waste changes.
- 2.1 A second Waste Services Seminar for Members is currently being planned for either 30<sup>th</sup> January or 6<sup>th</sup> February 2014 (to be confirmed in due course).

#### 2 RECOMMENDATIONS

- 2.1 I recommend that the Council:
  - a) Approves the Integrated Waste Management Strategy which will be used to inform future decision-making, ensuring Scottish Borders Waste Services remain fit-for-purpose, sustainable and provide best value.
  - b) Ensures compliance with the Waste (Scotland) Regulation 2012 by agreeing the undernoted proposed solution, Option 6 for food waste collections:
    - 1) SBC build a food waste transfer station at the Easter Langlee depot, Galashiels;

- 2) the phased roll out of a food waste collection service during spring/summer 2015;
- 3) the collection and transportation of food waste to the bulking station by Scottish Borders Council;
- 4) following procurement activity, agree a contract for the haulage and treatment of food waste for an interim period, until such time as the SBC/NES Waste Treatment Facility is operational.
- c) Agrees the removal of the kerbside garden waste collection service from urban areas with effect from 31 March 2014 in order to achieve the associated Business Transformation savings.
- d) Recognises the need to immediately implement a comprehensive communications plan, including a letter to all households affected, to successfully manage the removal of the garden waste collection service.
- e) Agrees a CRC provision review is carried out covering the following:
  - 1) proposals for a new Community Recycling Centre in Kelso to be prepared for Council consideration
  - 2) A review of all CRCs opening hours
  - 3) A review of CRC access policies with particular attention being given to trade access.

#### 3 BACKGROUND INFORMATION

- 3.1 Over the last decade there have been significant changes in the way municipal waste is managed in the Scottish Borders and this will continue to be the case for the foreseeable future. The changes are the result of radical policy and regulatory change at European, national and local levels.
- 3.2 The European Union (EU) has adopted a number of directives aimed at harmonising waste management policies throughout Europe. EU directives have strongly influenced national waste management strategy and have led to the introduction of new pieces of national legislation.
- 3.3 The key policy and regulation drivers influencing waste and recycling services through to 2025 are:
  - EU and Scottish Government Waste and Recycling Targets
  - National Waste Policy Zero Waste Plan (2010)
  - Waste (Scotland) Regulations 2012.

Further detail on the above is available in section 3 of Appendix 1 - IWMS.

3.4 Scottish Borders Council has already made a step change in its performance, increasing its recycling rate from 8% in 2004/05 to 41% in 2012/13. However it is clear that, in order to comply with the Waste (Scotland) Regulations 2012 and deliver sustainable, cost efficient services, the Council will need to carry out regular reviews and make further significant changes to the waste services currently provided.

#### **INTEGRATED WASTE MANAGEMENT STRATEGY**

- 3.5 The implementation of an Integrated Waste Management Strategy Appendix 1, will provide clear strategic direction for municipal waste management in the Borders through to 2025. The Strategy will be the framework within which all future decision-making is made and assist in delivering a waste service that is 'fit for purpose' and both financially and environmentally sustainable in the long term.
- 3.6 It is important that the IWMS is agreed as it is one of the Council's Business Transformation Projects and is programmed to contribute £800k of the £28 million required to be saved by 2017/18.

Savings Required	2013/14	2014/15	2015/16	2016/17
Develop an Integrated Waste Management Strategy	-	£500,000	£150,000	£150,000

- 3.7 The IWMS will be delivered via an action plan where a number of individual projects have been assessed and grouped into high, medium and low priority see Appendix 1 IWMS (Appendix 1). Each of these individual projects will contribute to one or more of the following:
  - EU Directives
  - National Waste Policy i.e. Zero Waste Plan
  - Legislative requirements including the Waste (Scotland) Regulations

#### 2012

- Council Administrations 'Ambitious for the Borders 2012'
- Long term financial sustainability
- Business Transformation Savings
- Service user needs and expectations
- Council Priorities
- E&I Objectives
- Waste Services Business Plan
- Environmental Impact / carbon footprint.
- Prioritising service delivery is vital going forward in order to ensure the Council is able to continue to maintain mandatory service provision whilst also ensuring compliance with the new regulations. It is therefore deemed necessary to review all non-mandatory services provided in order to identify potential areas where budget savings can be made allowing priority to be given to mandatory service provision.
- 3.9 Scottish Borders Council's recycling rate is likely to fall in the short term as a result of the planned projects (i.e. removal of the garden waste service). This is an unavoidable outcome of the need to balance the delivery of a Waste Service that is 'fit for purpose' and both financially and environmentally sustainable in the long term, versus achieving the Scottish Government's aspirational recycling targets.
- 3.10 This report provides options for the future delivery of the first two high priority service areas the new mandatory requirement for the introduction of food waste collection services and the current non-mandatory garden waste collection service. The report also seeks approval in principle for changes to the CRC service. These options demonstrate how contributions could be made towards achieving the agreed £800k savings required from the IWMS as part of the Council's wider Business Transformation Programme.
- 3.11 A significant part of future communications, both internally and externally, will highlight the IWMS and the need for service reviews and Council decisions having to be made as part of an *Integrated* strategy and never in isolation. This report is the first example of this, where CRC provision along with food and garden collection services have been reviewed as a package and proposals put forward.
- 3.12 In order to meet Government targets, comply with legislation and deliver services that are financially sustainable, difficult decisions will have to be taken since the on-going cost of delivering existing waste services as well as introducing new mandatory services will not be possible going forward.

#### 4 FOOD WASTE COLLECTIONS

- 4.1 The Waste (Scotland) Regulations 2012 require Scottish Borders Council to introduce food waste collections to approximately 24,000 households in Hawick, Peebles, Selkirk, Jedburgh and Galashiels (including Tweedbank) only. The deadline for introducing this service is 1<sup>st</sup> January 2016.
- 4.2 The Waste (Scotland) Regulations require food waste to be collected separately from all other waste and does not allow it to be mixed in with

general, residual waste during the treatment process. As a result, food waste cannot be treated in the SBC/New Earth Solutions (NES) Integrated Waste Facility to be built at Easter Langlee, Galashiels.

- 4.3 Research of various food collection, food haulage and food waste treatment facilities, both currently in operation and in development, has been undertaken. The proposed solution, Option 6, is one which involves roll out during Spring / Summer 2015 allowing SBC the time required to undertake necessary infrastructure and procurement works. This solution also minimises SBC spend during years when a food waste collection service is not mandatory, ensures compliance with the Regulations and represents best value for the Council on both a yearly revenue basis and longer term over the next 25 years.
- 4.4 Until such time as the SBC/NES Integrated Waste Facility is up and running, SBC proposes to collect and transport food waste to a bulking station at Easter Langlee that SBC will build and operate. There it will be bulked up for onward transport and treatment by a private waste management company. Once the SBC/NES Integrated Waste Facility is up and running, it will be NES's contractual responsibility to organise the onward transport and treatment of the food waste.
- 4.5 The full impact of food waste collections on Council revenue and capital funds will not be fully known until a decision is made regarding further Zero Waste Scotland (ZWS) food funding from the Scottish Government.
- 4.6 Appendix 2 Food Waste Collections Supporting Data provides more detailed information of considerations that have resulted in the selection of the proposed solution, Option 6. A proportion of the information used in determining the proposed solution is commercially sensitive and confidential and therefore not available in this report however is available to Members upon request.

#### 5 KERBSIDE GARDEN WASTE COLLECTIONS

- 5.1 Kerbside garden waste collections are currently provided to urban areas only, fortnightly between March and November and monthly over Dec/Jan/Feb. Rural areas are encouraged to compost at home with the opportunity to take household garden waste to Community Recycling Centres available to all householders in the Borders.
- 5.2 Local Authorities have no mandatory duty to provide a separate collection of garden waste.
- 5.3 Failure to deliver savings via the garden waste review will put significant pressure on the Council's ability to achieve the IWMS Business Transformation savings of £800,000.
- 5.4 The undernoted options were considered as part of the review of this service:
  - 1) Status Quo retaining the existing service
  - 2) Eliminate the service
  - 3) Introduce a chargeable service to urban areas only
  - 4) Introduce a chargeable service to all households in the Borders.

- 5.5 Options 3 and 4 are not considered viable due to the extremely high risks and uncertainties in terms of service take-up, pricing levels and ability to cover service costs, scheme administration set up, public reaction and for option 3, equality of service provision. It is not considered viable to continue with Option 1, status quo service provision, taking into account the need to introduce a new, mandatory, food waste collection service, maintain existing recycling services and ensure waste services are financially sustainable in the future.
- The removal of the garden waste service will have a detrimental effect on the Council's household recycling rate. The reduction is estimated at 5%. However this will be counteracted by the introduction of the food waste collection service and the new Waste Treatment Facility.
- 5.7 The removal of the kerbside garden waste service will address current service provision inequality issues that have been regularly raised since the service was introduced in 2005.
- 5.8 Significant consideration has been given to the undernoted areas with works on-going to finalise any related plans and policies as required:
  - alternative garden waste disposal routes
  - garden bin re-use options for householders
  - system for the return of unwanted garden bins from households
  - SBC re-use options of returned garden bins
  - home compost bin offer to urban householders
  - home composting options, advice and workshops for householders
  - increased levels of garden waste being presented at CRCs
  - route optimisation works
  - community composting advice.
- 5.9 Householders will be advised of alternative disposal routes for their garden waste which will include composting at home, taking to a CRC and, as a last resort, using any spare space in their general waste bins.
- 5.10 A detailed communications plan has been developed using the undernoted media to immediately manage the removal of the kerbside garden waste collection service.
  - Customer First scripts & training
  - press releases
  - letter to all householders affected
  - SBC website
  - Radio Borders advertising
  - Press adverts
  - FAOs
  - Councillors Information Pack
  - IWMS Members Seminar
  - Area Forum meetings
  - Community Council information

- bus rear advertising
- posters
- bin stickers
- flyers
- Roadshows / Workshops
- SBConnect articles.
- 5.11 Appendix 3 Garden Waste Review Supporting Data provides detailed information of considerations, research undertaken, options reviews, strengths and weaknesses, etc that have resulted in the proposal to remove the kerbside garden waste collection service from 31<sup>st</sup> March 2014, Option 2.

#### 6 COMMUNITY RECYCLING CENTRE PROVISION

- 6.1 A high level review of the distribution, number and location of sites has been undertaken. It indicates that all settlements with a population of 1,500 or more are within a 10 mile radius of a Community Recycling Centre except for Kelso (see Appendix 4 Current Community Recycling Centre Provision).
- 6.2 Council messages will continue to emphasise the need for householders to take individual responsibility for the waste they produce and how it is managed (ideally re-used and repaired where possible before being recycled). It is important however that as many households as possible are provided access to Community Recycling Centres to support the delivery of the Integrated Waste Management Strategy, particularly with the proposed removal of the kerbside garden waste collection service.
- 6.3 The development of a Community Recycling Centre at Kelso will increase the number of households within a 10 mile radius of a CRC from approximately 85% to 95% (see Appendix 5 Proposed Community Recycling Centre Provision). It is recognised however that there are settlements (including West Linton, Newcastleton and Cockburnspath) with a population between 350 and 1,500 that will still be out with the 10 mile radius. Further work will be undertaken to determine whether it is possible to improve access to recycling facilities in these areas. This will include contacting neighbouring authorities to discuss the potential of accessing facilities out with the Council's boundary.
- 6.4 It is proposed to develop a Community Recycling Centre in Kelso and for a detailed proposal with accurate costs for developing and running the site to be reported at a future meeting.
- 6.5 A review of the Community Recycling Centre operating hours at all facilities and consideration of a Trade Waste access policy is also required and will be reported on.

#### 7 IMPLICATIONS

#### **Financial**

#### 7.1.1 Food Waste Collections

(a) The approximate capital cost of getting set up for the introduction of a food waste collection service is £650,000 and the annual revenue operating costs estimated at approximately £600,000.

- (b) Appendix 2(f) Food Waste Collections Supporting Data provides detail of the financial rankings of the various options considered along with a note of the assumptions made to-date.
- (c) Much of the financial information used in determining the proposed solution is commercially sensitive and confidential and therefore not available in this report however is available to Members upon request.
- (d) It has been calculated that the proposed solution, Option 6, represents the best value for SBC on a yearly revenue basis and long term over the next 25 years
- (e) Council revenue funds have already been identified to cover the on-going costs of delivering the new food waste collection service to the five towns identified.
- (f) In July 2013 the Council submitted a food waste funding bid to Zero Waste Scotland however we were advised in October that this fund has now been fully utilised. ZWS and COSLA are currently lobbying the Scottish Government for additional funds to be allocated so awards can be made to Local Authorities who have not yet submitted bids and for those with bid applications in. SBC awaits the outcome of this process.
- (g) Until such time as clarification is received regarding food waste capital and revenue funding from ZWS / Scottish Government, the full impact of costs to SBC will not be known.

## 7.1.2 Kerbside Garden Waste Collections

- (a) Appendix 3 Garden Waste Review Supporting Data provides detail of the financial implications of the various options considered along with a note of the assumptions made and associated risks.
- (b) It is anticipated that Option 2, the removal the kerbside collection service from  $31^{\rm st}$  March 2014 will create approximately £450,000 of business transformation savings.
- (c) There are costs associated with the removal of the service which include:
  - Communications/Education and Awareness
  - Return of unwanted garden bins from householders
  - Wheeled bin disposal/recycling costs
  - Home composting bin provision
  - Additional landfill costs until the SBC/NES Integrated Waste facility becomes operational.
- (d) The balance of Business Transformation savings required for 2014/15 will be achieved and managed through a range of minor changes to service operations. These include adjustments to working arrangements that will remove the need for overtime.

### 7.1.3 Community Recycling Centre Provision

(a) Current estimates indicate that the capital costs to develop a site will be in the region of £750,000, with on-going, annual, revenue costs of around £150,000.

#### 7.2 **Risk and Mitigations**

- (a) The Integrated Waste Management Strategy is to be implemented through the delivery of various individual actions and projects, see Appendix 1 of the IWMS (Appendix 1) for details. It is not possible at this time to determine all the risks and mitigations of the IWMS due to this reason. The risks and mitigations will only be identified once individual actions and projects are progressed and any resultant proposals are brought forward for consideration.
- (b) The risks and mitigations associated with both food waste and kerbside garden waste collection options are listed in Supporting Data for each project, Appendices 2 and 3. These will be reviewed and mitigations updated as further information becomes available to ensure risks are anticipated and minimised as far as possible.
- (c) The risks and mitigations associated with a Kelso CRC will be considered in the future report to be brought to Council for consideration.

### 7.3 **Equalities**

#### 7.3.1

## (a) Integrated Waste Management Strategy

This EIA considers the impacts that may occur as a result of the implementation of the Integrated Waste Management Strategy excluding garden waste, food waste and CRC provision as these have been considered separately.

An EIA has been completed for the IWMS which initially indicates no major impacts. It is not possible at this time to determine the full impact of the IWMS as a number of projects and service reviews may result from the IWMS which will require to be individually assessed. The impacts will only be known once service reviews are completed and projects identified and it is at this point that an Equality Impact Assessment will be undertaken.

#### 7.3.2 Food Waste Collections

(a) The Council has a mandatory duty to supply a food waste collection service to nominated urban areas only. The issue surrounding service provision equality is also addressed in 7.6(b) & (c), Rural Proofing.

An Equalities Impact Assessment (EIA) has been completed for the proposed food waste collection solution and identifies that the undernoted groups may be adversely impacted as a result of the introduction of the service due to not being able to use the new containers that will be supplied.

- Age
- Disability
- Health problems/issues

- (b) Removing food waste from the general waste bin may have a positive impact on all groups as follows:
  - make the general waste bin lighter and therefore easier to wheel to the collection point.
  - raise awareness of the amount of food wasted resulting in subsequent reductions in waste and money savings through behaviour changes.
- (c) The adverse impacts of the introduction of the food waste service should be accepted since Waste (Scotland) Regulations require this action of the Local Authority.

#### 7.3.3 Kerbside Garden Waste Collections

(a) SBC has no mandatory duty to provide a separate garden waste collection service. The issue surrounding service provision equality is also addressed in 7.6 (d), Rural Proofing.

An Equalities Impact Assessment has been completed for the proposed option 2, to remove kerbside garden waste collections. This identifies various alternative disposal options for garden waste that will mitigate the impacts of withdrawing the service and is in line with the disposal options already in place in rural areas (where there has never been a kerbside garden waste collection service provided).

- (b) The alternative disposal routes for garden waste are noted in Appendix 3(r). An extensive communications campaign and educational support has been prepared to raise awareness of these routes.
- (c) The undernoted groups may be adversely impacted as a result of the removal of this service and due to householder inability to dispose of garden waste as per alternative disposal routes being recommended by the Council.
  - Age
  - Disability
  - Poverty
  - Healthy problems/issues
- (d) Removing the kerbside garden waste collection service will result in the same options for garden waste disposal applying to all householders in the Borders. It will remove complaints relating to unequal service provision that has been a contentious issue with many householders since the service was first introduced (in 2005).
- (e) It is unlikely that all of the alternative disposal options will be an issue to any one individual. Accordingly, the adverse impacts of the withdrawal of the garden waste service should be accepted.

#### **Community Recycling Centre Provision**

(a) An equalities impact assessment for Community Recycling Centre provision will form part of future works and be included in a future report.

#### 7.4 **Acting Sustainably**

- (a) The economic, social and environmental effects associated with the implementation of an Integrated Waste Management Strategy are listed in Appendix 1(b).
- (b) The economic, social and environmental effects associated with both food waste and kerbside garden waste collection options are listed in Supporting Data for each project, Appendices 2(g & h) and 3(o & p).
- (c) The economic, social and environmental effects associated with the CRC Provision will be considered in a future report to be brought to Council for consideration.

#### 7.5 **Carbon Management**

- (a) The review and delivery of future waste services as part of an Integrated Waste Management Strategy will ensure that services are not just fit for purpose but both financially and environmentally sustainable.
- (b) The introduction of the food waste collection service as per Option 6 will result in increased diversion of waste from landfill which will reduce carbon emissions. However it will also result in additional collection routes and vehicles emissions which will increase carbon emissions. There is however a mandatory requirement to introduce separate food waste collections and therefore all efforts will be made via route monitoring and optimisation works to minimise any increased carbon impact.
- (c) Removing the garden waste service will reduce the number of collection routes and miles travelled thus reducing the carbon impact of the Councils refuse collection fleet. It should be noted that additional garden waste will likely be placed in the residual waste bin which will go to landfill until such time as the new Waste Treatment Facility becomes operational. This will result in a short term increase in landfill related carbon emissions.
- (d) The Carbon Management impacts of the CRC provision will be considered as part of the future report to be brought to Council for consideration.

#### 7.6 **Rural Proofing**

- (a) Waste service provisions via an Integrated Waste Management Strategy will ensure that equality and access to services for all continues to be taken in to account along with other key considerations (finance, best value and longer term sustainability).
- (b) It is anticipated that the introduction of proposed solution for food waste collections may create an access and equality issue as it will only be provided in urban areas in line with the requirements of the Waste (Scotland) Regulations 2012.
- (c) The adverse impacts of introducing the food waste collection as per the proposed solution should be accepted since the provision of the service is a mandatory requirement and the areas to receive the

service stipulated by Scottish Government.

(d) It is anticipated that there will be no adverse impact on the rural area from Option 2 - the removal of the garden waste service. Option 2 will have the impact of removing service provision inequalities associated with this current service.

## 7.7 Changes to Scheme of Administration or Scheme of Delegation

(a) There are no changes to be made.

#### **8 CONSULTATION**

8.1 All comments received during the consultation process have been incorporated into this report.

## Approved by

## Director of Environment & Infrastructure Signature .....

#### Author(s)

Name	Designation and Contact Number
Ross Sharp-Dent &	Waste Manager, x8857 / Waste Strategy Manager, x 6629
Julie Rankine	

**Note** – You can get this document on tape, in Braille, large print and various computer formats by contacting the address below. Neighbourhood Services can also give information on other language translations as well as providing additional copies.

Contact – Neighbourhood Waste Services, Environment & Infrastructure, Scottish Borders Council, Council Headquarters, Newtown St. Boswells, TD6 0SA Tel. No. 0300 100 1800

#### Appendix 1

#### **Integrated Waste Management Strategy**

#### (a) Integrated Waste Management Strategy

See separate document.

### (b) Acting Sustainably - IWMS

#### **Impacts of delivering an Integrated Waste Management Strategy**

It is anticipated that the delivery of the Integrated Waste Management Strategy will assist the Council in:

- achieving landfill diversion targets;
- achieving landfill allowance scheme targets (if re-instated);
- achieving European and national recycling and composting rates;
- complying with current and new waste regulations;
- delivering municipal waste services;
- controlling waste arisings and waste growth;
- developing potential partnership arrangements;
- determining future resource implications for waste management in the Scottish Borders.

The Integrated Waste Management Strategy is to be implemented through the delivery of various individual actions and projects, see Appendix 1 of the IWMS for details. The table below outlines whether each of these actions will have an environmental, social and/or economic impact.

It is not possible at this time to determine the full sustainability impact of the IWMS as a number of the actions/projects require reviews to be completed. The impacts will only be known once the review is complete and it is at this point an assessment of 'Acting Sustainably' will be undertaken.

#### **Summary of Effects**

Type of Effect	Action (see Appendix 1 of IWMS for action detail)
Environmental, Social and Economic	1, 7, 9, 10, 11, 12, 15, 17, 19, 20, 21, 22, 23, 26, 26, 27, 29, 30, 34, 35, 36, 37
Social and Economic	16, 28
Environmental & Economic	2, 5, 8, 18, 24, 31, 32, 33
Environmental	3, 4, 6
Economic	25
Considered separately (see	13
Appendix 3(O))	
Considered separately (see	14
Appendix 2(h))	

# Impacts of doing nothing

Impact	Type of Impact
Limits the Councils ability to achieve landfill diversion targets	Environmental,
	Social, Economic
Limits the Councils ability to achieve landfill allowance scheme	Environmental,
targets (if re-instated), which may result in financial penalties	Economic
Limits the Councils ability to achieve European and national	Environmental
recycling and composting rates	
Limits the Councils ability to comply with current and new waste	Environmental,
regulations (i.e. Waste (Scotland) Regulations 2012.	Social, Economic
Limits the Councils ability to control waste arisings and waste	Environmental,
growth	Social, Economic
Limits the Councils ability to develop partnerships arrangements	Environmental,
	Social, Economic
Limits the Councils ability to provide a waste service which is 'fit	Environmental,
for purpose and financially viable in the long term.	Social, Economic

#### **Appendix 2**

### Food Waste Collections - Supporting Data

### a) The Scottish Government Food Waste Funding Conditions

- food waste must be collected weekly
- food waste must be collected separately and cannot be mixed with other materials, e.g. garden waste.

#### b) Food Waste Options - Collection, Storage, Haulage & Treatment

Substantial research of other Local Authority (LA) collection practices, including visits to other LAs that have a food waste collection service in place, was undertaken. Treatment facilities either in operation or being developed within 80-100 miles of the Borders were also reviewed.

#### c) SBC / NES Contract

Food waste is a constituent part of the residual waste stream and is defined as contract waste within the Waste Treatment Contract with New Earth Solutions (NES). A provision was made within the Waste Treatment Contract for the introduction of food waste collections.

#### d) Options Considered

Consideration has been given to various different waste treatment companies and service providers including SBC, undertaking the key elements involved in a food waste service provision (i.e. bulking, hauling and treating).

The impacts of the above variations have been considered with option 6, SBC undertaking food waste collections and transporting to a waste transfer facility, built and operated by SBC, and the onward haulage and treatment undertaken by a private waste treatment company representing best value.

Option No.	Description
1,2, 3, 4,	Long term contract with a waste treatment company, with SBC bulking and hauling. Out with long term SBC waste treatment contract.
1a	As above but SBC carry out haulage.
5	Short term contract with a waste treatment company with SBC bulking and hauling. Once NES/SBC Integrated Waste Facility is operational, NES takes over bulking and hauling and arranges treatment of food waste.
5a	Do nothing until NES/SBC Integrated Waste Facility is operational. Following which NES bulk, haul and arrange treatment of the waste.
6	Short term contract with a waste treatment company until NES/SBC Integrated Waste Facility is operational. Following this SBC continues to bulk, and NES arranges haulage and treatment.
7	Short term contract with a waste treatment company with SBC bulking and hauling. Once NES/SBC Integrated Waste Facility is operational, NES arranges treatment contract and SBC continues to bulk and haul waste.

## e) Review of Options

A high level review of the strengths and weaknesses for each of the options has been undertaken against the following criteria and is summarised in the table: **Financial Ranking & Strengths and Weaknesses.** 

- **Haulage cost rises** Exposure to increases in fuel price, etc
- **Gate Fee rises** Exposure to food waste gate fee increases
- Access to ZWS Funding Can ZWS funding be accessed
- Failure to meet ZWF Risk of ZWS funding spend deadlines being missed

#### f) SBC Food Waste Options - Financial Rankings & Strengths and Weaknesses

Option	Haulage Cost Rises	Gate Fee Rises	Access ZWS Funding	Failure to meet ZWF date	Rev. Cost Year 3 Rank	Rev Rank 25 Yr Cost
1	RED	RED	GREEN	GREEN	7	3
1a	RED	RED	GREEN	GREEN	8	6
2	RED	RED	GREEN	GREEN	9	7
3	RED	RED	GREEN	GREEN	6	2
4	AMBER	RED	GREEN	GREEN	5	1
5	GREEN	GREEN	GREEN	GREEN	3	9
5a	GREEN	GREEN	RED	RED	4	8
6	GREEN	GREEN	GREEN	GREEN	1	4
7	RED	GREEN	GREEN	GREEN	2	5

Key:

RED – HIGH RISK AMBER – MEDIUM RISK GREEN - OK

## g) Acting Sustainably - Food Waste

# Impacts of implementing Option 6 (proposed solution)

Impact	Type of Impact
Ensures compliance with the Waste (Scotland) Regulations 2012.	Social
Increases the numbers of miles travelled and vehicle emissions.	Environmental
Of the options considered represents best value to the Council.	Economic
Increases the cost of delivering the Council waste services placing additional pressure on the Councils budgets during an already challenging financial period.	Economic
Requires a kitchen caddy to be stored in the household. Not all residents may feel they have room for additional containers.	Social
Requires an external caddy to be stored within the curtilage of the	Social,
property and presented for collection. This may present storage and aesthetic issues.	Environmental
The service is only delivered to specified towns (i.e. 24,000 households) and therefore is not equitable.	Social
Increases the Councils recycling rate and contributes towards achieving National and EU Waste Targets.	Environmental
Reduces the amount of waste sent to landfill and therefore the costs and carbon emissions associated with this activity.	Economic, Social

# h) Impacts of doing nothing

Impact	Type of Impact
In breach of the Waste (Scotland) Regulations 2012. Exposes the	Economic,
Council to potential litigation and fines.	Environmental
No increase in the distance travelled by the Councils refuse collection service. Consequently there will be no increase in the	Environmental
carbon emissions associated with delivering the service.	
The Council will not be exposed to the cost of delivering the	Economic
service.	
Householders will not have a kitchen caddy or an external caddy	Social,
which is likely to be seen as a benefit by many. Householders will	Environmental
be required to continue to put kitchen waste in the residual bin.	
The Council will not see the benefit from the increase in food waste	Environmental,
diverted from landfill until the new waste treatment facility	Economic
becomes operational.	
The Councils recycling rate will not see the increase associated with	Environmental
a food waste collection.	

# i) Assumptions, Risks and Mitigations – Food Waste

# Option 6 (Proposed Solution)

Assumption	Risk/Impact	Mitigation
Costings based on an	Higher or lower tonnages will	The tonnage used was
assumed food waste arising	impact on the disposal costs and	recommended by ZWS following
per household served of	collection routes.	studies of average tonnages
1.5kg/hh/wk		received by other Local Authorities.
Assumed vehicle payload of	Due to changes in vehicle model	
2.85T	manufacturing in compliance with	
	EU Emissions Regulations there is	
	a risk that the preferred collection	
	vehicle will not be available at time	
	of purchase and a vehicle of a	
	different size and payload will need	
	to be purchased. This may impact	
A	on vehicle costs.	F1. 9.99 1 1 1 1 1 1 1
Assumed 60% participation	Greater participation rates will put	Flexibility has been worked into the
rate and therefore will only	additional pressure on collection	routes to allow them to be able to
require 1 driver and 1	routes	take additional material should it be
loader per collection vehicle Finance model assumes	Dick that gate food and havilage	produced.
costs for waste treatment	Risk that gate fees and haulage costs may increase going forward	
e.g. gate fees & haulage	and SBC will incur increased costs.	
will remain at current	and SDC will incut increased costs.	
prices/quotes		
Finance model assumes	Risk that prices given on Scotland	
costs for caddies and liners	Excel may change and SBC may	
will remain at current prices	incur increased costs.	
quoted on Scotland Excel		
Assumed that prices and	Risk that prices and lead times	
lead times for capital	may change and SBC will incur	
purchases will remain at	increased costs and experience	
current levels.	longer lead times for items.	
Assume that ZWS funding	Funding application was submitted	Frequent contact with ZWS has
will be available for 2014/15	in July 2013 and SBC currently	been maintained.
	awaiting outcome.	
Assumed that licences	Risk that licences are not obtained	Working closely with SBC
associated with	on schedule, and that project	Architects, SEPA and AHVLA and
development of bulking	timescales are delayed.	have incorporated their advice in
facility at Easter Langlee		our plans, should aid application
will be obtained on		approvals
schedule e.g. building		
warrant, PPC Regulation 12 Change Notification, and		
ABPR application.		
Assumed service will be	Risk that delaying introduction of	Meets mandatory introduction date
introduced April 2015	service until April 2015 will make	of January 2016.
onwards	no contribution to SBC's recycling	
	rate in 2014/15	Food waste collections from 2015
		onwards will help SBC work
		towards the Scottish Government's
		recycling target of 60% by 2020.
Assumed a significant	Risk that the number of enquiries	An extensive communications
number of customer	will be greater than expected and	campaign will be carried out
enquiries will be received	SBC will incur increased staff	advertising the introduction of the
regarding the introduction of	costs.	service.
the new service		
Assumed annual caddy	Risk that the rate of replacement is	
(internal and external)	greater than anticipated and SBC	

replacement rates of 2%	incurs increased costs.	
Risk of customer	High levels of complaints/enquiries	
complaints due to inequality	are likely to be received. This will	
of service provision	put pressure on customer first and	
	back office waste staff. May result	
	in increased staffing costs.	
Risk of customer	High levels of complaints/enquiries	An extensive communications
complaints due to the	are likely to be received. This will	campaign will be carried out
provision of more recycling	put pressure on customer first and	advertising the introduction of the
containers to households	back office waste staff. May result	service.
which will need to be stored	in increased staffing costs.	
in kitchen/garden.		

## j) Food Waste Collections - Proposed Option

The proposed Option 6 (Proposed solution) represents the best value for the Council on a yearly revenue basis and long term over the next 25 years. The strengths associated with this option are as below:

- Access to ZWS funding enabled.
- SBC spend this and next year is minimised allowing budget reallocation towards savings targets.
- Meeting the Regulations deadline for the introduction of food waste collections.
- Time for infrastructure and procurement works to be undertaken.
- Impact of future increase in haulage costs minimised.
- Impact of future increase in gate fees minimised.

#### Appendix 3

#### Garden Waste Review - Supporting Data

#### a) Current Service Provision

In 2004 the Council received funding from the Scottish Executive via the Strategic Waste Fund to roll out kerbside garden waste collection in urban areas only and to provide home composting bins in rural areas.

The Council currently provides the following garden waste services:

Service Type	Coverage	Number of Households
Kerbside Collection	Urban areas only	~38,000
Home Composters	Rural areas	~19,000
Six Community	Available to all areas	100%
Recycling Centres		

#### b) Service Inequality

Over the years, the lack of kerbside garden waste collection services in rural areas has resulted in regular, on-going requests from householders, Councillors and Members of the Scottish Parliament for expansion of the service.

#### c) Legal Context

Local Authorities have a mandatory duty to collect household waste, which includes garden waste, under Section 45 of the Environmental Protection Act 1990 Part 2. However, there is no duty placed on Local Authorities to provide a separate collection of garden waste.

Section 46 of the same Act, allows Local Authorities to specify to the householders how waste is to be presented and policies associated with collection. It also allows for a charge to the householder for the provision of waste receptacles.

Schedule 2 of The Controlled Waste Regulations 1990 allows local authorities to make a charge for the collection of garden waste but not for the treatment of garden waste.

#### d) National Context

The garden waste services provided by Local Authorities in Scotland are outlined in the table below:

Type of Garden Waste Service	Number of Local Authorities
Separate kerbside collection	19
Commingled food and garden collection	8
Do not provide a kerbside collection	5

It has been widely reported that the number of Local Authorities in the UK charging residents for garden waste collections has increased in recent years as they look to retain services during this period of austerity.

Currently no Scottish Local Authorities charge for garden waste collections but Officers are aware of Scottish Local Authorities that are reviewing garden waste collections and considering a charge. These discussions reflect the changing policy position in Scotland to one that matches the existing policy position in England and Wales.

# e) National Summary of Household Kerbside Garden Waste Collections Source: Waste Recycling Advisory Programme (WRAP)

Percentage of local authorities operating organic collections 2010/11

	Operate an organic scheme	Charge for the organic scheme
England	93%	29%
Wales	95%	32%
Scotland	88%	0%
Northern Ireland	81%	0%
UK	92%	25%

#### f) Future Garden Waste Delivery Options & Implications

Given the non-mandatory nature of the garden waste service, the requirement to provide a 'fit for purpose' service that is financially sustainable, combined with the Councils budget pressures, a review of garden waste collection services has been undertaken.

The options considered as part of this review and which have be costed are outlined below:

- Status Quo Retain the current kerbside garden waste collection service to urban areas only and continue promotion of waste minimisation and home composting.
- 2. **Eliminate Service** Remove the current kerbside garden waste collection service and increase promotion of CRC garden waste services along with waste minimisation and home composting.
- 3. **'Charged for' Service to existing customers** Introduce a chargeable kerbside garden waste collection service to the urban areas only i.e. those areas that currently receive a free service.
- 4. **'Charged for' Council wide service** a chargeable kerbside garden waste collection service to urban areas initially and following monitoring and a review, calculate the cost and impacts of expanding the chargeable service to cover the whole of the Borders.

#### g) Options 1 - Status Quo

A review of the current kerbside garden waste service has confirmed that it costs the Council approximately £610,000 to deliver.

It can be seen from the **Garden Waste options – Strengths and Weaknesses** table that continuing to provide a free of charge service to urban areas has a number of strengths including the fact that it will maintain the Councils recycling rate. However it presents a number of significant weaknesses.

The way in which the service is delivered will continue to result in equality issues between urban and rural areas.

The continued provision of the service will not provide any savings resulting in a continued budget pressure of circa £610k. This will require additional IWMS business transformation savings to be found from other service changes and puts at risk the Councils ability to achieve the full £800k savings.

#### h) Option 2 - Eliminate Service

Garden waste represents approximately 5.3% of the total household waste stream in terms of weight.

The removal of this service will reduce the recycling rate by approximately 5.3% and will impact the ability to achieve EU and aspirational Scottish Government targets.

The current garden waste service is well liked by residents and it is anticipated that the removal of the service will result in a negative public reaction. Alternative disposal options are provided at the Councils six Community Recycling Centres. However a number of areas that currently receive a garden waste collection service such as Kelso have already raised access/locality issues and this is likely to exacerbate the negative reaction in these areas.

Eliminating the service will create savings amounting to approximately £450,000 in 2017/18. The savings would contribute significantly towards the total IWMS Business Transformation Savings required.

#### i) Option 3 - 'Charged for' Service to existing customers

The Councils recycling rate will reduce by 4.4% if this option is introduced. Therefore the removal of this service will negatively impact the Councils household recycling rate and impact the ability to achieve EU and aspirational Scottish Government targets.

The provision of a 'Charged for' Service to urban areas will also contribute approximately £450,000 towards Business Transformation Savings in year 2017/18.

In order to achieve this saving 10% of households in urban areas (i.e. 3,000 households) must take-up the service with an annual charge of £77.60.

It can be seen from the Annual Garden Waste Charge  $(\pounds)$  vs Participation Rate (% of h/h) graph that achieving a 10% participation rate with an annual charge of £77.60 is possible but unlikely. The charge is at the very high end of the spectrum in terms of annual charges possible at that level of participation. It is therefore suggested that there is a price uncertainty and high participation risk.

A new administration system would need to be set up to manage the service and in particular invoice/charge householders. This is likely to take some time to introduce although it would be our aim to achieve a system where it is paid for by direct debit.

The public are likely to react negatively to the introduction of a charge for a service which has previously been provided free of charge. In addition there will continue to be inequality issues between urban areas who will be able to 'opt in' and rural areas who will not be able to access the service.

## j) Options 4 - 'Charged for' Council wide service

The Councils recycling rate will reduce by 3.8% if this option is introduced and will impact the ability to achieve EU and aspirational Scottish Government targets.

The provision of a 'Charged for' Service Council wide will contribute approximately £445,000 towards Business Transformation Savings in year 2017/18.

In order to achieve this saving 10% of households across the Borders (i.e. 5,000 households) must take-up the service with an annual charge of £146.55.

It can be seen from the Annual Garden Waste Charge  $(\pounds)$  vs Participation Rate (% of h/h) graph in that achieving a 10% participation rate with an annual charge of £146.55 is highly unlikely as no other Council has achieved a participation rate of this order with such a high annual charge. It is therefore suggested that there is a very high price uncertainty and participation risk associated with this option.

A new administration system will need to be set up to manage the service and in particular to invoice householders. This is likely to take some time to introduce although it would be our aim to achieve a system where it is paid for by direct debit.

The public are likely to react negatively to the introduction of a service which has previously been provided free of charge. However it does ensure the delivery of an equitable service in terms of location to all households across the Borders taking away what has been an issue for rural households since the introduction of the current service.

#### k) Proposed Option

The review of garden waste represents the single largest opportunity for financial savings in terms of the IWMS Business Transformation Project.

Eliminating the garden waste service (Option 2) will contribute approximately £450,000 of business transformation savings in 2017/18.

All of the other options either present lesser savings opportunities, incur additional cost or have significant risks associated with the assumptions that have had to be made relating to 'take-up' or annual charging levels.

Priority will be given to ensuring the public is made fully aware of the reasons for the removal of this service via the delivery of a comprehensive communications plan.

In addition, increased call volumes and enquiries are being expected and action will be taken to manage this, ensuring customer care standards are maintained.

Priority will also be given to engaging with the public to maintain recycling understanding and participation levels with a view to meeting future recycling targets.

#### I) Strengths and Weaknesses

A high level review of the strengths and weaknesses for each of the options has been undertaken against the undernoted criteria:

- **Recycling Rate Impact** Will the Scottish Borders recycling rate be impacted i.e. reduced?
- **Delivers Savings** Will the predicted Business Transformation Savings be achieved?
- **Take-Up Uncertainty** Will the participation rate be achieved? This is linked to the price charged.
- **Pricing Uncertainty** Will the annual charge cover the collection costs associated with providing the service? This is linked to the take up/participation of the service modelled for each option.
- **Administration Issues –** Will there be administration issues?
- Public Reaction How will the public react?
- **Equity of Application** Will the service be equitable? For example will urban and rural areas receive the same level of service?

In the years leading up to 2017/18 the savings delivered by each of the options is less than what would be expected in the long term for the following reasons:

- Service implementation costs i.e. communications, bin deliveries, setting up systems, etc
- Service withdrawal costs i.e. bringing bins back in, recycling bins, storing bins, communication etc
- The delivery of the waste treatment facility i.e. migration of waste disposal at the landfill to the new facility (different disposal costs), the guaranteed minimum tonnage (GMT) etc.

It is for this reason that 2017/18 is used as the 'comparison year' for assessing the long term annual savings of each of the options.

## m) Garden Waste options - Strengths and Weaknesses

A summary of the Strengths and Weaknesses is shown in the undernoted table.

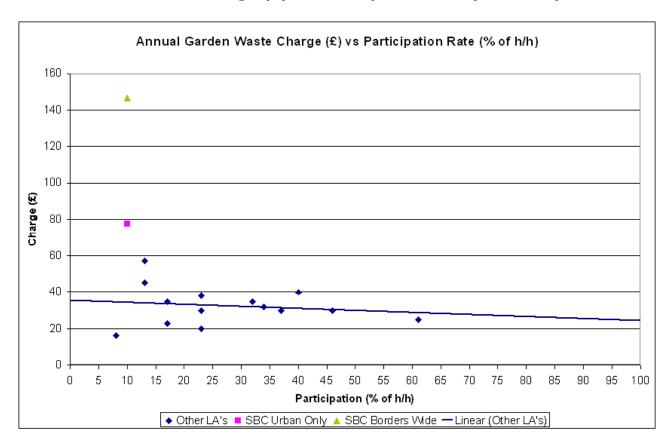
Option	DESCRIPTION	Saving	Annual Household Charge for Service	Re- Cycling Impact	Delivers Savings	Take-Up Uncertainty	Pricing Uncertainty	Admin Issues	Public Reaction	Equity of Service
1	Status Quo : Do Nothing	£0	NA	GREEN	RED	GREEN	GREEN	GREEN	GREEN	RED
2	Eliminate Completely Garden Waste Service with 15% displacement	-£448,652	NA	RED	GREEN	GREEN	GREEN	AMBER	RED	GREEN
3	Create a "Charged For" Service with existing Households	-£452,846	£77.60	AMBER	AMBER	RED	RED	RED	RED	RED
4	Create a "Charged For" Service for ALL Borders Households	-£444,319	£146.55	AMBER	AMBER	RED	RED	RED	RED	GREEN

RED – HIGH RISK AMBER – MEDIUM RISK GREEN - OK

#### n) Participation Rates vs Annual Charge

Research undertaken of Local Authority garden waste charges have been plotted the following onto the undernoted graph:

### Annual Garden Waste Charge (£) vs Participation Rate (% of h/h)



It should be noted that it is difficult to draw direct comparisons due to the range of services provided. However it does provide us with the best interpretation of what we might expect to see.

A number of factors are likely to impact participation/take up rates. However it is reasonable to suggest that the annual charge levied on householders is likely to have a significant impact on the participation rate achieved.

The higher the charge the lower the likely participation rate.

# o) Acting Sustainably - Garden Waste

# **Impacts of implementing Option 2 – Eliminate Garden Waste Service**

Impact	Type of Impact
Ensures that the kerbside collection service delivered by Scottish Borders Council is equitable, which has not previously been the case due to the urban/rural split.	Social
In order to compost waste at the Councils six Community Recycling Centres some members of public will have to travel further than others. This will result in additional cost to householders.	Economic, Environmental
Reduction in distances travelled by the Councils refuse collection vehicles resulting in a positive impact on the Councils carbon emissions. However this benefit will be reduced by the increase in householders travelling to CRC's to dispose of their garden waste.	Environmental
The removal of the service will create significant savings for the Council.	Economic
Reduction in the amount of garden waste composted and reduction in the Councils recycling rate. This will limit the Councils ability to achieve national and EU waste targets.	Environmental
Householders without access to a car will be required to compost their garden waste at home. This will not be possible for all.	Economic, Social, Environmental
The removal of the service will allow garden waste bins to be removed from properties which will take away a storage issue. In addition, garden waste bins will not be required to be presented at the kerbside which will take away issues raised about aesthetics in certain town centres.	Social, Environmental
It will increase the amount of waste put into the residual waste bin. In the short term, until the new waste treatment facility is operational, it will increase the amount of waste landfilled. This will increase carbon emissions and disposal costs in the short term.	Environmental, Economic.

# p) Impacts of doing nothing

Impact	Type of Impact
The kerbside garden waste service will continue to be inequitable in	Social
terms of the rural/urban split.	
The distance travelled by the Councils refuse collection service to	Environmental
collect garden waste will continue. This will maintain the carbon	
emissions associated with delivering the service.	
The cost of delivering the service (circa £608k) will continue. This	Economic
will significantly impact the Councils ability to achieve the £800k	
savings associated with the IWMS Business Transformation Project.	
Consequently additional savings will need to be found from other	
service reviews and changes.	
The amount of garden waste composted will be maintained as a	Environmental
result the Councils recycling rate will also be maintained.	
The amount of waste diverted from landfill will continue minimising	Environmental,
carbon emissions and costs associated with landfill disposal.	Economic.

# q) Assumptions, Risks and Mitigations – Garden Waste

# Option 2 – Eliminate Garden Waste Service

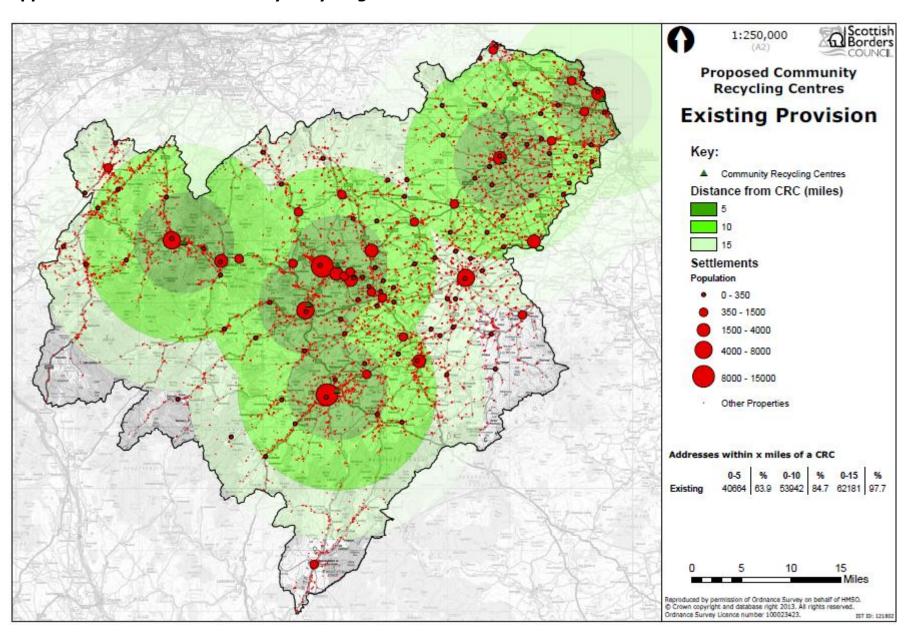
Assumptions	Risks/Impacts	Mitigation
Assumed 15% of kerbside garden waste tonnage will be presented for collection in general waste wheeled bins	Current collection routes, tonnages and disposal costs have been considered and there is a risk of increased general waste tonnage, landfill tax costs, pressure on general waste collection routes and collection costs should the percentage of waste disposed of in this way be greater than estimated.	Home compost bins will be issued free of charge and their use promoted. The disposal of garden waste at CRCs will be promoted.
Assumed 35% of kerbside garden waste tonnage will be taken to Community Recycling Centres for disposal	Risk of increased garden waste tonnage received at CRCs and associated treatment costs, should the percentage of waste disposed of in this way be greater than estimated.  There is the need for additional resources at CRCs to deal with the estimated 35% increase in waste. CRCs will require an upgrade to cope with this additional waste.	Home compost bins will be issued free of charge and their use promoted.
Assumed 50% of kerbside garden waste tonnage will be composted at home or retained in gardens	Risk of increased collection and disposal costs should the percentage of waste disposed of in this way be less than estimated.	Home compost bins will be issued free of charge and their use promoted.
Assumed a significant level of complaints and enquiries will be received regarding the removal of the service, which will require additional staff.	Risk of incurring increased staff costs should the level of customer complaints/enquiries be higher than anticipated.  Previous service changes saw average monthly call levels increase from approximately 200 per month to 800-1000 per month.	An extensive communications campaign will be carried out advertising the service withdrawal and outlining the various alternative options for managing garden waste.
Assumed that a number of householders will wish to retain their garden waste wheeled bin for another, non-collection related use (i.e. convert into a coal bunker, etc). However, it is assumed that a significant percentage of householders will request their garden waste bin to be uplifted	If the number of households who wish to keep their garden waste bin is less than anticipated and therefore the number of bin uplifts required is greater than anticipated, there is a risk of incurring increased costs for vehicles, crews, bin storage and disposal etc.  Costings for the individual elements required to uplift the bins, e.g. vehicle hire, have been estimated. There is a risk that the costs incurred will be greater than anticipated.	An extensive communications campaign will be carried out advertising the service withdrawal and the option to retain the garden waste wheeled bin for other uses.

Risks	Impact	Mitigation	
Currently kerbside garden waste collections account for approximately 5% of SBC's recycling rate. There is a risk that the withdrawal of kerbside garden waste collections will result in a reduction in SBC's recycling rate.	Restricts SBC's ability to achieve EU and Scottish Government recycling targets. At present the Scottish Government's targets are non-mandatory and are purely aspirational. However, there is a risk that in future failure to meet EU and Scottish Government targets may result in fines.  May result in loss of reputation with the Scottish Government and Zero Waste Scotland.  May adversely impact on future funding offers and support from Zero Waste Scotland.	An extensive communications campaign will be carried out advertising the service withdrawal and the disposal of garden waste at CRCs will be promoted.	
Increased fly tipping levels	Fly-tipped materials in unwanted areas; may attract more additional fly-tipping; increased fly-tipping related / clearance workload and costs for Neighbourhood Services staff	An extensive communications campaign advertising alternative disposal options to be delivered along with fly-tipping enforcement information.	
Risk of loss of reputation and public support for recycling. Risk of potential loss of public participation in kerbside dry mixed recyclate collections and recycling at CRCs.	Reduced participation in kerbside recycling and CRC recycling will lead to a reduction in SBC's recycling rate, increased volume of material in general waste bins, increased general waste collection costs and landfill tax costs.		
Risk of public criticism and confusion as collection calendars issued in October 2013 show garden waste collections for the next 2 years.	High levels of complaints/enquiries are likely to be received. This will put pressure on customer first and back office waste staff. May result in increased staffing costs.	An extensive communications campaign will be carried out advertising the service withdrawal.	
Risk that the increase of garden waste in general waste bins will change the composition of the waste going to NES plant from Summer 2015.	May lead to a deemed Council Variation in the NES waste treatment contract and could potentially lead to an increase in gate fee. This could reduce the savings which may be achieved by the NES waste treatment contract.	Home compost bins will be issued free of charge and their use promoted. The disposal of garden waste at CRCs will be promoted.	

#### r) Alternative Garden Waste Disposal Options:

- Home composters may be offered to householders in urban areas for free as part of the garden waste withdrawal process (subject to available funding).
- Home composting advice and workshops available via SBC's composting partners, Ask Organic.
- Six Community Recycling Centres across the Borders accept garden waste free of charge.
- Investigations into a suitable location in Kelso for the build of a CRC to be progressed.
- The Council will assist and advise any communities requesting information on community composting as much as they can.

**Appendix 4 - Current Community Recycling Centre Provision** 



**Appendix 5- Proposed Community Recycling Centre Provision** 

