

## **ACS Submission - Consistency in Household and Business Recycling in England**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Department for Environment, Food and Rural Affairs' consultation on Consistency in Household and Business Recycling in England. ACS is a trade association which represents over 33,500 convenience stores across the UK. Our members include Spar UK, Nisa Retail, Costcutter and thousands of independent retailers. More information about ACS and the convenience sector is available in Annex A.

There are 38,963 convenience stores in England, 72% of which are run by independent retailers<sup>1</sup>. Polling of independent convenience retailers found that convenience retailers are recycling in their business with 41% disposing their mixed recycling through local authority collections, 21% through general waste contractor, and 9% through specialist waste contractor<sup>2</sup>. As such, the Government must consider carefully how the proposals to increase recycling from businesses will impact businesses' existing recycling practices.

It is important that there is consistency in business waste collections by local authorities given that nearly half of businesses have their mixed recycling collected through this system. The types of recycling that must be separate must also be consistent across the UK to ensure clarity for retailers which operate in more than one local authority and/or nation. For convenience retailers who contract waste collections through private businesses, the Government should ensure that requirements to separate waste does not place additional costs on businesses where the waste contractor may charge more money for the separation of recycling in different waste streams.

Convenience stores typically have low amounts of food waste to dispose of and their experience of the 5 kg food waste exemption in Scotland has been positive. Polling of independent convenience retailers in England found that over a third (37%) of retailers do not generate any food waste, while 29% will dispose as part of general food waste, 18% will recycle using a separate food waste bin, 12% will consume food waste or give to staff and 6% will donate food waste to a local cause. Where food waste is disposed of, 53% have it collected by the local authority, 28% will have food waste collected through a general waste contractor and 7% through a specialist waste contractor<sup>3</sup>.

Lastly, on reporting obligations - it should be the responsibility of the waste management company to report data on the waste recycling performance of an area rather than the responsibility of the business to report their data. The majority of the convenience sector are independent retailers (72%) who would not have the resources at a head office to fulfil the reporting obligations and 26% of retailers do not have an EPOS facility to record waste<sup>4</sup>. Therefore, it would also be challenging for an independent convenience retailer to have the time (as well as resources) to record their recycling data.

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<sup>1</sup> ACS Local Shop Report 2020

<sup>2</sup> ACS Voice of Local Shops Survey November 2017

<sup>3</sup> ACS Voice of Local Shops Survey August 2016

<sup>4</sup> ACS Local Shop Report 2020

Please see below for ACS' response to the relevant questions in the consultation. **For more information on this consultation response please contact [Lydia.hamilton-rimmer@acs.org.uk](mailto:Lydia.hamilton-rimmer@acs.org.uk).**

**Q46. Do you agree or disagree that waste collectors should be required to collect the following dry materials from all non-household premises for recycling, in 2023/24?**

Very few convenience retailers will be producing high volumes, if any, of this type of waste material. Therefore, we do not have any objections to waste collector collecting this material.

Material	Agree/Disagree
Aluminium foil	Agree
Aluminium foil trays	Agree
Steel and aluminium aerosols	Agree
Aluminium tubes e.g. tomato puree tubes	Agree
Metal jar lids	Agree
Food and drink cartons e.g. TetraPak	Agree

**Q48. Do you agree or disagree that collections of plastic films could be introduced by the end of 2024/25 from non-household municipal premises?**

Agree.

Very few convenience retailers will be producing high volumes, if any, of this type of waste material. Therefore, we do not have any objections to the 2024/25 deadline as long as appropriate recycling infrastructure is in place.

**Q52. What are the main barriers that businesses (and micro-firms in particular) face to recycle more?**

	Large Barrier	Some Barrier	Low/no barrier
Communication		X	
Financial		X	
Space	X		
Engagement			X
Drivers to segregate waste			X
Location		X	
Enforcement			X
Variation in bin colours and signage	X		
Contractual		X	
Staff/training	X		
Other			

**Q53. Should micro-firms (including businesses, other organisations and nondomestic premises that employ fewer than 10 FTEs) be exempt from the requirement to present the five recyclable waste streams (paper & card, glass, metal, plastic, food waste) for recycling? Please select the option below that most closely represents your view and provide any evidence to support your comments.**

Yes.

We welcome the consideration of a micro-firms exemption from requirements. Some businesses may have limited space such as convenience stores, which are typically smaller than 3,000 square feet to sort and separate out waste. Independent convenience retailers have the smallest stores, with 59%<sup>5</sup> of trading out of stores below 999 square feet. In addition, 23% of independent retailers have no additional space back of house to store and separate waste.<sup>6</sup> For these retailers it may be challenging to find space in store to manage the separation of waste.

Additionally, we would like to work with Government to encourage small businesses under the 10 FTE threshold to separate waste where operationally and logistically viable.

**Q54. Should any non-household municipal premises other than micro-sized firms be exempt from the requirement? Please provide evidence to support your comments**

Yes.

Many symbol group and multiple site convenience operators with trade from small stores but their businesses will have more than 10 FTE employees because they operate multiple sites. Therefore, all convenience stores, regardless of employee numbers, will have to contend with minimal space to sort and separate out waste. For these retailers it may be challenging to find space in store to manage the separation of waste and store until collected.

As stated previously in Q53, we would welcome working with the Government to encourage the sector to separate waste where viable.

**Q55. Which recyclable waste streams should be included under a potential zoning scheme?**

We agree that dry recyclable waste streams including; glass, metal, plastic, paper and card should be included under a potential zoning scheme. Please refer to Q50 to understand the reasons for excluding food waste under certain levels of waste through potential zoning and the wider scheme.

**Q56. Which of the below options, if any, is your preferred option for zoning/collaborative procurement? Please select the option that most closely aligns with your preference above**

ACS' preferred zoning option is co-collection.

ACS' data finds that 37% of convenience stores are located in rural locations and 26% are located in suburban locations. This means that a high proportion of local shops operate in a residential setting where co-collection zoning would be most appropriate. We agree that it is efficient and best if the contractor for household collection services also delivers the non-household municipal services in these areas which will drive down collection costs for local authorities but also businesses.

Material specific and exclusive service zoning would create inconsistency within recycling and amongst businesses. There must be consistent business waste collections by local authorities across England to ensure clarity for retailers which operate in more than one local authority. This is particularly important as 53% of independent convenience retailers use their local authority collection to dispose of food waste and 41% use their local authority collection to dispose of mixed recycling<sup>7</sup>.

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<sup>5</sup> ACS Local Shop Report 2020

<sup>6</sup> ACS Local Shop Report 2020

<sup>7</sup> ACS Voice of Local Shops Survey November 2017

For the collaborative procurement projects, given the small amount of waste retailers have to be collected they would not play a leading role in the setting up and management of collaborative procurement projects. Additionally, in regards to encouraging businesses to work together in the same geographical proximity, this would be difficult for small format retailers given existing waste contracts and multiple site agreements.

**Q57. Do you have any views on the roles of stakeholders (for example Defra, the Environment Agency, WRAP, local authorities, business improvement districts, businesses and other organisations and chambers of commerce) in implementing a potential zoning or franchising**

The stakeholders implementing zoning must work with local businesses to communicate the changes and understand recycling and waste businesses needs. We support the Governments acknowledgement that there is a need for business-facing support tools to inform good practice and that these should be developed with WRAP. We encourage the Government and WRAP to further liaise with all types of businesses including different format retailers. The support tools offered must recognise the array of operational and logistical challenges consistent recycling poses for retailers; for example, the recognition of the lack of space small format retailers have to store waste as well as, the importance for a simplified collection system that does not place time or administrative burdens on retailers.

Additionally, assets should be provided for the understanding of employees who will be carrying out the separation of waste for their place of work to comply. It would be most beneficial for these assets to be largely pictorial to support where English is not a first language.

We also believe that changes to recycling must be supported by a nationwide awareness campaign for the understanding of both consumers but also businesses and their employees.

**Q60. Which type(s) of business support would be helpful? (Select any number of responses)**

ACS agrees that the following options would be helpful to supporting businesses; National /regional campaigns, national guidance and good practice case studies, online business support tools (e.g. online calculators and good practice guidance).

Additionally, staff facing assets are essential to communicating to staff how they should be disposing of business waste and to in turn, ensure the business is compliant. As previously mentioned, we would urge the Government to ensure these assets are largely pictorial for where English is not a first language.

**Q62. Could the following recyclable waste streams be collected together from non-household municipal premises, without significantly reducing the potential for those streams to be recycled?**

We agree that both options; plastic and metal, glass and metal can be collected together and separated by the local authority recycling facility.

Collecting the above recycle together would significantly reduce particularly space burdens on retailers as they would not be required to store waste in separated bags. As previously stated, convenience stores are typically smaller than 3,000 square feet and independent convenience retailers have the smallest stores, with 59%<sup>8</sup> of trading out of stores below 999 square feet. In addition, 23% of independent retailers have no additional space back of

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<sup>8</sup> ACS Local Shop Report 2020

house to store and separate waste.<sup>9</sup> Therefore, minimalizing the amount of separated waste retailers would have to store is crucial to store storage and day to day operations.

**Q63. What, if any, other exemptions would you propose to the requirement to collect the recyclable waste stream in each waste stream separately where it would not significantly reduce the potential for recycling or composting?**

There will be extremely low volumes of plastic and metal, glass and metal from the majority of convenience retailers. This is because these waste materials are not frequently used in the sector, already backhauled through the supply or will be captured by new recycling infrastructure such as DRS.

**Q64. Do you have any views on the proposed definition for ‘technically practicable’?**

N/A

**Q65. Do you agree or disagree that the proposed examples cover areas where it may not be ‘technically practicable’ to deliver separate collection?**

Agree.

**Q69. Do you have any views on what might constitute ‘excessive costs’ in terms of economic practicability?**

It is common that small format retailers have next to no back of house space. Therefore, there must be consideration for the loss of stock they can hold in any storage space if recycling requirements mean they have to store waste in this area. For a retailer to give up stock to store recycling, means they will lose goods they can profit from.

**Q74. We are proposing to include factors in the written assessment which take account of the different collection requirements, for example, different premises within a service area. What other factors should we consider including in the written assessment?**

N/A

**Q76. Do you agree or disagree that a template for a written assessment would be useful to include in guidance**

Yes.

**Q77. Do you agree or disagree that the proposed approach to written assessments and non-household municipal collections will deliver the overall objectives of encouraging greater separation and assessing where the three exceptions (technical and economical practicability and environmental benefit**

Yes.

**Q78. Do you have any comments and/or evidence on familiarisation costs (e.g. time of FTE(s) spent on understanding and implementing new requirements) and ongoing costs (e.g. sorting costs) to households and businesses?**

There must be ample implementation time supported by business tools and consumer awareness campaigns to ensure businesses understand and can correctly implement the new recycling requirements. Please refer to Q.60.

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<sup>9</sup> ACS Local Shop Report 2020

