

**COMMITTEE:** EXECUTIVE      **REF NO:** E/24/56  
**DATE:** 8 APRIL 2025  
**SUBJECT:** SIMPLER RECYCLING – MIXED  
RECYCLING AND RESIDUAL  
WASTE OPTIONS  
**PORTFOLIO HOLDER:** COUNCILLOR PHILIP SMART  
**SENIOR OFFICER:** HANNAH LEYS

***Short description of report content and the decision requested:***

Government has legislated for Councils to align their waste and recycling services with new nationwide Simpler Recycling requirements by 31<sup>st</sup> March 2026. The Council already meets many of the requirements, but it will need to either provide new services or alter existing services to collect:

- food waste (weekly)
- glass bottles and jars
- cartons
- plastic film (by April 2027)

Executive is asked to consider the contents of this report and decide on the mixed recycling model that is to be implemented in Ipswich as well as the frequency of residual waste collection.

If the chosen model is Twin Stream, then Executive is asked to recommend to Council the approval of an additional £1.8m to be added in the Capital Programme for 2025/26 to make provision for the procurement of the additional bins required. Authorisation is also sought for the procurement activity necessary to implement a mixed recycling collection service by 31<sup>st</sup> March 2026 through an outsourced specialist delivery distribution company for bin delivery if the in-house option is not feasible or practicable.

***Ward(s) affected:***

*All wards*

***List of Appendices included in this report:***

*Appendix 1 – Equality Impact Assessment*

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*This report was prepared after consultation with:*

*Internal consultees:*

*Corporate Management Team*

*Portfolio Holder for Environment and Transport*

*External consultees:*

*Suffolk Waste Partnership*

*Eunomia*

*The following policies form a context to this report:*

*(all relevant policies must also be referred to in the body of the report)*

*Corporate Strategy – Proud of Ipswich: Championing our Community and*

*Revitalising our Town*

## **LIST OF BACKGROUND PAPERS AS REQUIRED BY LAW**

*(papers relied on to write the report but which are not published and do not contain exempt information)*

1. **Executive Paper Ref: E/23/44 Simpler Recycling (Food Waste)**  
**<https://democracy.ipswich.gov.uk/mgAi.aspx?ID=21373>**

## **OTHER HELPFUL PAPERS**

*(papers which the report author considers might be helpful – this might include published material)*

1. **The Environment Act 2021** **[Environment Act 2021 \(legislation.gov.uk\)](#)**
2. **[Resources and waste strategy for England - GOV.UK \(www.gov.uk\)](#)**
3. **[25 Year Environment Plan: progress reports - GOV.UK \(www.gov.uk\)](#)**
4. **Government response to the Consultation on requirements within The Environment Act 2021 - [Government response - GOV.UK \(www.gov.uk\)](#)**
5. **Simpler Recycling in England: policy update - [Simpler Recycling in England: policy update - GOV.UK](#)**

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## **1. Executive Summary**

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- 1.1 Government has legislated for Councils to align their waste and recycling services with the new nationwide Simpler Recycling requirements by 31<sup>st</sup> March 2026. The Council already meets many of the requirements, but will need to either provide new services or alter existing services to collect:
- food waste (weekly)
  - glass bottles and jars
  - cartons
  - plastic film (by April 2027)
- 1.2 In the Executive Paper of 6 February 2024 Simpler Recycling – Food Waste Collections (Ref No: E/23/44), decisions were made on the implementation of a food collection service and it was reported that further guidance would be issued by Government on the requirements for the collection of dry recycling products and clarification on the new funding mechanisms for this. Decisions would then be required on meeting the new requirements for the additional dry recycling materials.
- 1.3 This report focuses on a decision which is now needed on the mixed recycling model that is to be implemented in Ipswich and as the frequency of residual waste collection will have an impact on the collection of mixed recycling, a decision is also required on the frequency of residual waste collection.
- 1.4 The preferred recycling collection options have been developed by the Suffolk Waste Partnership members and the final choices will need to consider the benefits that a common collection method gives to contractual arrangements and communications campaigns.
- 1.5 Significant changes will be needed to the Materials Recovery Facility (MRF) contract operated by Suffolk County Council for all District and Borough Councils in Suffolk. Approval of the recommendations will allow them to proceed with negotiations to vary the contract and time for the contractor to make the required changes to meet the March 2026 deadline.
- 1.6 Due to concerns over the capacity of the supply chain to meet unprecedented nationwide demand for bins, Executive is asked to consider the contents of this report and the recommendation to proceed with the procurement activity necessary to implement a compliant mixed recycling collection service by 31st March 2026.

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## **2. Background**

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### **Simpler Recycling**

- 2.1 The Environment Act 2021, in particular the element of Simpler Recycling, aims to develop the UK's circular economy, increasing the lifespan of products and packaging and reducing the demand for virgin materials. It also sets targets to increase the UK's municipal recycling rate to 65% by 2035. This is vital to address the UK's plateauing recycling rates.
- 2.2 The Environment Act 2021's Simpler Recycling legislation requires businesses to separate recyclable materials from non-recyclable waste. This will impact businesses, households, waste collection authorities and suppliers by introducing a more standardised collection system across England.
- 2.3 Ipswich Borough Council has stated its commitment to Simpler Recycling (previously known as Consistency in Recycling Collections) and already meet many of its requirements via Suffolk County Council's disposal and recycling system. However, the Council will need to either provide new services or alter existing services to collect glass bottles and jars, cartons, food waste (all by April 2026) and plastic film (by April 2027).
- 2.4 In addition to Simpler Recycling, the Act also enables Extended Producer Responsibility (pEPR). pEPR ensures that producers of packaging waste are responsible for covering the costs associated with its collection, recycling and/or disposal of the packaging that they place on the market. Government is currently in the process of setting up PackUk as Scheme Administrator to oversee pEPR, with fees being collected from packaging manufacturers in October 2025. PackUk will be responsible for setting the pEPR fees, collecting the fees from obligated producers and issuing packaging waste disposal payments to local authorities.
- 2.5 This means that Local Authorities will in future receive payments for the household packaging waste they collect and send for reprocessing. This will include packaging collected as part of a kerbside recycling scheme, packaging present in residual waste (the refuse bin) and packaging collected in litter bins.

### **New Government Guidance**

- 2.6 On 29th November 2024 DEFRA wrote to all Chief Executives and published an update on Simpler Recycling, which set out the new default requirements for premises in scope of Simpler Recycling includes containers for:
  - residual (non-recyclable) waste

- food waste (mixed with garden waste for households, if appropriate)
- paper and card
- all other dry recyclable materials (plastic, metal and glass)

These may be various container types, including bags, bins or stackable boxes.

## **Mixed Recycling**

2.7 Additional detail was included:

- By default, paper and card should be separately collected from all other dry materials so their potential to be recycled is not reduced.
- All other dry materials may be co-collected, as the benefit of simplifying (and thereby potential to increase volumes), offsets the smaller contamination risk.

2.8 Although the default requirement is set out above, DEFRA have also confirmed that local flexibility to co-collect paper and card with other dry materials remains where separate collection is technically or economically impracticable or provides no significant environmental benefit. For example, this may be more appropriate for high-rise flats or houses with very limited outside space.

2.9 Waste collectors will need to produce a short written TEEP assessment explaining their decision, which needs to be based on it:

- is not 'technically practicable'
- is not 'economically practicable'
- has 'no significant environmental benefit'

## **Residual Waste**

2.10 On 29<sup>th</sup> November 2024 the Government published new guidance ensuring good waste collection services for households - [Ensuring good waste collection services for households - GOV.UK](#)

2.11 This states:

“As is currently the case, waste collection authorities should continue to decide collection frequency and methodology for collecting the residual (non-recyclable waste) and dry recyclable waste streams, and do so in a way that meets local needs and provides value for money for the taxpayer.

When waste collection authorities are planning and delivering waste collection services from households, they should make sure that:

- all households have reasonable residual and recyclable waste collections

- they consider providing additional services for specific needs, such as households with medical needs
- there is no build-up of odorous waste at the kerbside
- changes to collections do not lead to an increase in fly-tipping of residual waste”

2.12 Therefore, the option to collect residual waste less frequently remains available.

## **Analysis of Service Models**

2.13 In 2022 the Suffolk Waste Partnership (SWP) commissioned an analysis of potential Environment Act compliant collection service models. This analysis was undertaken by Eunomia, a well-established specialist waste sector consultancy.

2.14 The analysis focussed on ‘standard’ service provision for the majority of properties. It is recognised that some properties, e.g., flats and houses of multiple occupancy (HMOs) will require a more tailored or ‘non-standard’ service.

2.15 The analysis looked at 11 possible collection service options based on 3 main recycling methodologies:

**Mixing / Co-Mingling/ Co-Collection** - collecting the new full range of recyclable materials in one recycling bin, for subsequent sorting.

**Twin Stream** – paper and card would be collected in one recycling bin, and glass, plastics and cans in a separate recycling bin to reduce sorting and preserve material quality.

**Kerbside sort** – under this model, all in scope recyclable materials, including food, would be separated into at least three different containers by the householder and collected in separate chambers on a single, specialist collection vehicle weekly.

2.16 Separate food waste collections and enhanced recycling will significantly reduce the quantity and odorous content of residual waste. The Eunomia analysis therefore also considered each recycling service alongside either a 2 weekly (as is current) or 3 weekly collection of residual waste.

2.17 The ‘kerbside sort’ recycling options use most vehicles and staff, so are the most expensive, and rely heavily on higher secondary material income to offset costs – income reliance is a major risk. These options also require the most bins/boxes per property. The ‘kerbside sort’ options were not progressed.

2.18 The 11 collection service options were evaluated against the range of weighted criteria as below:

- a. Additional Cost
- b. Change to Recycling Rate
- c. Carbon Impact
- d. Flexibility
- e. Jobs Created
- f. Social Value
- g. Public and Political Acceptability
- h. Ease of Implementation
- i. Compliance With Legislation

## Twin Stream

- 2.19 Twin Stream recycling collections keep paper and cardboard packaging separate from glass, bottles, cans, cartons etc.
- 2.20 Usually this requires 2 recycling bins, so an additional bin is provided to each property. Although the service could be provided through the provision of a box or sack, this would mean there is a significantly higher risk of litter occurring from loose material and will also require alternative refuse collection vehicle bodies to those currently being used so that a lower loading height is provided on the rear of the vehicle.
- 2.21 The analysis concluded that certain Twin Stream options provided the best overall future service models. These were:

Option 3 – Twin Stream alternating recycling collections and **fortnightly** refuse.

Option 7 – Twin Stream alternating recycling collection and **3-weekly** refuse.

Option 11 – Linear recycling collections (recycling collected 2 weeks out of 3) and 3-weekly refuse.

- 2.22 A visual explanation for the Option 3 Twin Stream collection model is identified below (Garden waste will become a subscription only service from 1st April 2025):

Collection Calendar	Week 1	Week 2	Week 3	Week 4
Refuse		✓		✓
Recycling 1	✓			
Recycling 2			✓	
Food	✓	✓	✓	✓
Garden (Subscription only)	✓		✓	

- 2.23 Twin Stream has lower projected costs for processing of the material collected, as a result of there being less processing needed to separate the materials mixed in the bin by the resident and then compacted together in the same refuse collection vehicle.

- 2.24 It is also likely that the recovered paper and cardboard will be a better quality commodity and can be sold at a higher value than in a Co-mingled/ Co-collection service as the contamination from glass, residual food etc is negligible.
- 2.25 Twin Stream is now the Government default requirement.
- 2.26 There will be a significant number of properties where a Twin Stream service will present challenges and a different approach including alternative collection containers or frequencies may need to be considered, especially:
- Urban terraced homes with little or no external space
  - Flats
  - Houses of multiple occupancy (HMOs)
  - Hard to access properties
- 2.27 The current property type in Ipswich is:
- Detached – 14%
  - Semi Detached – 38%
  - Terraced – 22%
  - Flats/ HMO etc – 25%
- 2.28 There would be a circa £0.23million per annum additional cost to the Council associated with a Twin Stream service due to the costs associated with the supply, distribution and ongoing maintenance of the additional bins.
- 2.29 The Council would need to arrange delivery of additional bins to approximately 63,000 households. This would be completed either with the procurement of an outsourced specialist delivery distribution company or using additional staffing resource and vehicles managed in-house by the Council.

### **Co-collection/ Co-mingled**

- 2.30 The Co-Collection/ Co-mingled option means that only 1 x recycling bin is needed at each property. Glass, paper/card, plastic bottles, cartons etc are all placed in one bin.
- 2.31 The collection frequency would be fortnightly.
- 2.32 The Co-mingled recycling options are expected to cost circa £2million per annum more to the Suffolk system than the Twin Stream options due to:



- a) The processing of the mixed material at a Material Recycling Facility to separate the material through both automated processes and manual picking lines.
  - b) The lower commodity value of paper and card which may be contaminated with glass shards and food.
- 2.33 There would be a circa £0.1million per annum additional cost to the Council when compared to current costs, due to the high likelihood of additional material within the recycling bin resulting in additional trips by the refuse collection vehicles to the MRF.
- 2.34 A visual explanation for the Co-mingled collection model is identified below (Garden waste will become a subscription only service from 1st April 2025):

Collection Calendar	Week 1	Week 2	Week 3	Week 4
Refuse		✓		✓
Recycling 1	✓		✓	
Food	✓	✓	✓	✓
Garden (Subscription only)	✓		✓	

### Processing of Mixed Recycling

- 2.35 Suffolk's recyclable materials are currently sorted under a Suffolk County Council (SCC) managed contract at a Materials Recycling Facility (MRF) in Great Blakenham. This contract was let in 2019 and runs until May 2029.
- 2.36 It would not be financially viable for the MRF facility to process both a Twin Stream and a Co-mingled product as the sorting lines will become inefficient.
- 2.37 As the intention is for Babergh/Mid-Suffolk, East Suffolk, West Suffolk to collect a Twin Stream material, it is the County Council's intention that the MRF is reconfigured to:
- a) Accept both a Co-mingled material and a Twin Stream material within separate bays in the facility tipping hall.
  - b) Process only the 'containers' stream from the Twin Stream material.
  - c) Load the 'paper & card' stream from the Twin Stream material onto bulk haulage to be processed at an alternative facility.
  - d) Load the 'Co-mingled/ Co-collected' stream onto bulk haulage to be processed at an alternative facility.

- 2.38 The MRF operator estimates that it will take 12–18 months to make the necessary infrastructure changes to the facility.
- 2.39 The configuration of the MRF (a) and bulk haulage arrangements (d) as detailed in 2.37 above will not be required if the Council's decision is to proceed with Twin Stream.

### **Refuse/ Residual Waste**

- 2.40 Simpler Recycling is expected to significantly reduce the quantity of material residents dispose of in their refuse bins. In particular:
- Food Waste – accounts for approximately 35% of the household refuse bin contents, and a significant proportion of odorous waste. This will be captured by the new weekly food waste service.
  - Glass and cartons – accounts for approximately 6% of household refuse bin contents. This will be captured by either the Twin Stream or Co-mingled service.
  - Plastic films – account for approximately 6% of household refuse bin contents. This will be captured by either the Twin Stream or Co-mingled service.
- 2.41 An increasing number of councils that have introduced enhanced recycling and food collections have also reduced the frequency of their refuse collections, delivering cost and carbon savings.
- 2.42 Evidence from these areas suggests that reducing refuse capacity alongside increased recycling capacity encourages greater adoption of recycling behaviours, resulting in improved capture of food and recyclable materials. An analysis on national averages demonstrates that average recycling performance could increase from c.38% to c.54% with improved recycling and food collections alongside 2-weekly refuse collection, but to c.59% alongside 3-weekly refuse collection.
- 2.43 The option to collect residual waste less frequently remains available.

### **Funding for Mixed Recycling**

- 2.44 Simpler Recycling aims to significantly improve recycling services as well as introduce nationwide consistency. Government has committed that the full cost of the collection and processing of mixed recycling additional requirements will be funded through packaging Extended Producer Responsibility (pEPR) payments from packaging producers.
- 2.45 From 2025, some organisations and businesses will have to pay a fee for the packaging they supply to or import into the UK market. The money will go to local authorities (LAs), as:
- waste disposal, waste collection or unitary authorities

- statutory waste disposal authorities
- 2.46 It will cover net costs of collecting, managing, recycling and disposing of household packaging waste. In the first year (April 2025 to March 2026) LAs will receive a basic payment based on: - publicly available and existing data, including WasteDataFlow information and Office of National Statistics (ONS) data - data about tonnages, operations and unit costs gathered from a representative sample of LAs across the UK.
- 2.47 A model (the Local Authority Packaging Cost and Performance model or LAPCAP) developed by DEFRA on behalf of the four nations has been used to determine the estimated net efficient costs incurred by every local authority (LA) in the UK for the management of household packaging waste.
- 2.48 In line with the draft Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations and where relevant to each authority, LAPCAP consider the following factors in determining the estimated net efficient costs:
1. The frequency, pattern and type of collections of household packaging waste undertaken within each LA
  2. The population density in each relevant area
  3. The type and accessibility of dwellings in each relevant area
  4. The levels of deprivation in each relevant area
  5. Government policies and the regulatory requirements affecting waste management to which your authority is subject
- 2.49 The estimated total pEPR payment for the Council for the 2025/26 financial year is £1.573million. SCC has also had its own estimate of payment related to its costs.
- 2.50 Whilst the pEPR payment may still change, in order to provide certainty to authorities, the UK government is guaranteeing that in 2025/26 the Council will receive at least the amount displayed above. Payments in future years may be linked to the collection model, recycling performance and/or costs.
- 2.51 The current cost for operating the Mixed Recycling service is circa £1.3million per annum. There would be a circa £0.1million per annum additional cost to the Council for a Co-mingled option due to the high likelihood of additional material within the recycling bin resulting in additional trips by the refuse collection vehicles to the MRF. There would be a circa £0.23million per annum additional cost to the Council associated with a Twin Stream service due to the costs associated with the supply, distribution and ongoing maintenance of the additional bins. These costs will be covered by the pEPR payment.

- 2.52 Whichever options are chosen the changes required for implementing Simpler Recycling will require a clear, easy to understand communications campaign with Ipswich residents.

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### **3. Relevant Policies**

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- 3.1 The Government has set a clear legal requirement for councils to introduce the required changes through Simpler Recycling part of the Resources and Waste Strategy for England.
- 3.2 Corporate Strategy – Proud of Ipswich: A financially sustainable council providing good quality services. The Council has a responsibility to provide high quality services. We know that the services we provide make individuals' lives better and help the town to thrive.

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### **4. Options Considered/Under Consideration**

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#### **Options**

- 4.1 There are two decisions which need to be made:

Decision 1 – Which model for Mixed Recycling?

Decision 2 – Is there to be a change to the frequency of Residual waste collections?

- 4.2 The options can be described as:

Co-mingled mixed recycling collections  
Twin-Stream mixed recycling collections

Three-weekly refuse collections  
Fortnightly refuse collections

#### **Decision 1 - Mixed Recycling**

##### Option - Co-mingled/ Co-collected Mixed Recycling

- 4.3 The Co-mingled mixed recycling model is the one currently in place in Ipswich.
- 4.4 The Co-mingled option is not the better option for the environment in terms of emissions, as the material would not be processed at the Great Blakenham MRF and would be bulk hauled to North London for processing. There is more likelihood of paper and card being rejected during the processing due to contamination from glass.
- 4.5 The Co-mingled option will be more costly to the 'Suffolk System' as there will be additional costs associated with the transport and processing of this material to a processing facility in North London.

Additionally, the paper and card product recovered is likely to result in a lower resale value than that recovered from a Twin Stream.

- 4.6 It would be difficult to demonstrate through a TEEP assessment that this is the preferred model. A TEEP assessment requires the Council to demonstrate that the Government default model of Twin Stream collection is not 'technically practicable', or not 'economically practicable', or has 'no significant environmental benefit'.
- 4.7 This option is not recommended as the model is the least "efficient and effective" in terms of gaining the most benefit from the Co-mingled recycling material. This may result in lower pEPR payments as it is not the Government's default model. Adoption of this model would decrease the environmental benefits of the changes, would be less cost effective and would require a detailed technical and environmental analysis to be considered. It is unlikely the Council would be able to gain approval.

#### Option - Twin Stream Mixed Recycling

- 4.8 The Twin Stream option would be considered the best option for the environment in terms of emissions, as although it will require an additional bin to be provided, there is less processing required at the MRF and there is less likelihood of paper and card being rejected during the processing due to contamination.
- 4.9 The Twin Stream option will be less costly to the 'Suffolk System' as the material can be processed along with the other Suffolk material and a less contaminated paper and card product is likely to result in a higher resale value.
- 4.10 The Twin Stream option can be designed to be a better fit with neighbouring authorities meaning there would be less potential for a need for change if there are boundary changes as a result of Local Government Reorganisation.
- 4.11 The Twin Stream option will require each property to have an additional 240l bin for recycling.
  - a) This may present challenges to some residents in finding storage space for an additional 240l bin on top of the current recycling bin and the food waste and residual waste bins.
  - b) There are a significant number of properties where the bins remain on the public highway between scheduled collections and an extra mixed recycling bin will add to the 'bin congestion' that already exists.
  - c) The number of bins remaining on the public highway is expected to reduce from the return of Garden Waste bins from those residents who have chosen not to subscribe to the chargeable scheme from 01 April 2025.

- 4.12 It is likely that a number of properties; some flats and HMOs may need to have sack collections for the paper/card stream due to space limitations or may need to have a Co-mingled/Co-collection model.
- 4.13 This is the recommended option as it meets the Government default requirement, this option also has lower projected costs for processing of material and is likely to have a higher value commodity due to a better quality of paper and cardboard. This option has a favourable environmental impact and less emissions and will be a better fit with neighbouring authorities aiding communications and reducing the potential risk of additional change should any boundary changes occur as a result of Local Government Reorganisation.

## **Decision 2 - Refuse Collection Frequency**

- 4.14 Government guidance published in November 2024 states that waste collection authorities should continue to decide collection frequency and methodology for collecting the residual (non-recyclable waste).
- 4.15 The Government guidance states that local authorities must monitor any changes to collection frequencies to ensure there are no unintended adverse consequences. Households receive “reasonable” residual waste collections, that there is no build-up of bad smelling waste at the kerbside, changes to collections do not lead to an increase in fly-tipping of residual waste.

### **Option - Three weekly Residual waste collections**

- 4.16 This Option would maximise the opportunities to deliver the best outcomes from the service changes.
- 4.17 The weekly collection of food waste and introduction of additional materials that can be recycled will result in less material needing to be collected as residual waste, resulting in there being more capacity left in residents’ residual waste bin.
- 4.18 If residual waste collections were scheduled to be every 3 weeks rather than the current system of collecting every 2 weeks this would place more onus on compliant recycling and a push towards maximising recycling by residents.
- 4.19 As overall bin capacity per property would be increased through the removal of food waste and other mixed recycling items residents should have capacity in their residual waste bin to allow an extension of time between collections. Consideration would be needed for families with children in nappies and residents with certain medical conditions as this material may cause odour issues for residents if the material is not carefully wrapped to prevent odour release.
- 4.20 This option is not recommended at this time, as although separate food waste collections and enhanced recycling will significantly reduce the

quantity and odorous content of residual waste it is deemed that this would be a very contentious change for residents especially those who have the need to dispose of any type of nappy or similar waste and until a new system is up and running the real outcome on the volumes of waste and reduction in residual waste is relatively unknown

#### Option - Fortnightly Residual waste collections

4.21 The continuation of the fortnightly collection of residual waste will provide assurance to residents who may have concerns over their ability to manage a reduction in residual waste collections as a result of the expectation that the diversion of material into the other recycling streams will create additional capacity in the residual waste bin.

4.22 This is the recommended option for the collection of residual waste.

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### **5. Consultations**

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5.1 In December 2018 Government published its Resources and Waste Strategy (RAWS).

5.2 Government subsequently consulted on various RAWS policies in 2019 and 2021, following which in November 2021 the Environment Act was passed, providing the legislative basis through which the strategic waste reforms will be enacted.

5.3 In October 2023 Government published its plans for Simpler Recycling with some further clarity on implementation and funding being released in the subsequent months.

5.4 In May 2024 the Government moved the Separation of Waste (England) (No.2) Regulations 2024 to an affirmative Statutory Instrument, subsequently confirmed by the Joint Committee on Statutory Instruments. This confirmed Twin Stream as the Government's preferred method of collection.

5.5 On 29th November 2024 DEFRA wrote to all Chief Executives and published an update on Simpler recycling. This update set out the new default requirements for premises in scope of Simpler Recycling should include containers for residual (non-recyclable) waste, food waste (allowance to mix food and garden waste for applicable authorities), paper and card, all other dry recyclable materials such as plastic, metal and glass.

5.6 This precludes Co-mingled collections, as Ipswich Borough Council currently operate, without additional administration and the submission of a TEEP assessment to DEFRA outlining why it is not Technically or Environmentally Practicable to operate a preferred Twin Stream Recycling model.

5.7 All service models under consideration are operated and well established elsewhere. Officers have undertaken a series of discussions

with other authorities in Greater Manchester, Lancashire and Lincolnshire, where a Twin Stream model is utilised, in some cases alongside 3 weekly refuse, to better understand the real-world practicalities.

5.8 Discussions have also taken place with the company who currently process Suffolk's paper and cardboard. The company are very clear that their preference is to receive material via Twin Stream services for the following reasons:

- Twin Stream collection methods provide a higher quality of paper and cardboard.
- Twin Stream collections for paper and cardboard typically result in lower levels of contamination, including glass.

## 6. Risk Management

Risk Description	Consequence of risk	Risk Controls	Probability of risk occurring taking account of controls (scale 1-6) 1 – almost impossible 6 – very high	Impact of risk, if it occurred taking account of actions (scale 1 – negligible; 4 – catastrophic)	Actions to mitigate risk
Inability to implement a compliant set of recycling services.	Lack of consistency.  Public dissatisfaction.  Model not compliant with policy. Inability to receive pEPR repayment.	Approve proposed services and associated options for use	2	2	Approval on a model agreed.  Closely follow models created and process guidance
Lack of Public support for proposed changes.	Reputational damage.  Weakened application to the Secretary of State.  Weakened financial returns	Open, thorough, well designed and wide public communications	3	2	Well designed engaging communications & strong evidence base.
Failure to secure required cooperation from other	Delays to the process.	Cross boundary working with neighbouring authorities.	3	2	Early contact at a senior level to ensure cross boundary cooperation



Risk Description	Consequence of risk	Risk Controls	Probability of risk occurring taking account of controls (scale 1-6) 1 – almost impossible 6 – very high	Impact of risk, if it occurred taking account of actions (scale 1 – negligible; 4 – catastrophic)	Actions to mitigate risk
authorities if chosen collection method different.	Less complete coverage for communications  Varied messages				
Failure to secure Secretary of State approval for chosen collection method.	TEEP assessment required.  Profiling required for revenue return.	Managers are fully appraised of consequence of each collection model.	2	3	Full & well evidenced submission meeting all the criteria set out in the Regulations
Lack of progress due to insufficient resources	Delays  Poor public perception	Resource planning	3	2	Ensure adequate resources to undertake and complete the process

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## 7. Environment and Climate Change

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- 7.1 The Council has declared a climate emergency and has resolved to start working towards becoming carbon neutral by 2030. All Council decisions should take into account and respond to the potential impact that they will have on the climate and wider environment.
- 7.2 Simpler Recycling and its overarching aims are designed to reduce the amount of waste produced, increase the reuse and recycling of waste, resulting in a significantly reduced quantity of residual waste.
- 7.3 The Environment Act 2021, in particular the element of Simpler Recycling, aims to develop the UK's circular economy, increasing the lifespan of products and packaging and reducing the demand for virgin materials. It also sets targets to increase the UK's municipal recycling rate to 65% by 2035. This is vital to address the UK's plateauing recycling rates.
- 7.4 The Council will consider the impact of the implementation of the Simpler Recycling requirements at each stage as these plans are developed.

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## **8. Equalities, Diversity and Community Implications**

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- 8.1 Under the general equality duty as set out in the Equality Act 2010, public authorities are required to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation as well as advancing equality of opportunity and fostering good relations between people who share a protected characteristic and those who do not.
- 8.2 The protected grounds covered by the equality duty are: age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief, and sexual orientation. The equality duty also covers marriage and civil partnership, but only in respect of eliminating unlawful discrimination.
- 8.3 The law requires that this duty to have due regard be demonstrated in decision making processes. Assessing the potential impact on equality of proposed changes to policies, procedures and practices is one of the key ways in which public authorities can demonstrate that they have had due regard to the aims of the equality duty.
- 8.4 The Government's requirement for councils to introduce Simpler Recycling from all households by 31st March 2026 will affect daily life in Ipswich and it's imperative that the Council considers the impact of this on all residents. The equality, diversity, and community implications of the implementation of either a Twin Stream fortnightly or 3 weekly schedule, or a Co-mingled fortnightly or 3 weekly residual service will be considered carefully as part of the decision making process.
- 8.5 An Equality Impact Assessment has been carried out, which is included as Appendix 1. The three potentially affected groups who could be negatively impacted have been identified as Age, Disability and Pregnancy in its link to very young children in households.
- 8.6 Mitigations have been suggested for each of these and the impact is only likely to exist if there is a movement to 3 weekly refuse collection based on this being linked to the type and volume of waste in their refuse bins which cannot be recycled. It is not anticipated that there would be an impact on people with any protected characteristic if the Council stays with fortnightly refuse collections.
- 8.7 As this decision is still to be made, this EQIA will be revisited when that has happened.

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## **9. Crime and Disorder Impact**

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- 9.1 The proposals in this report will have no direct impact on crime and disorder in the Borough.

- 9.2 The service implementation plans required to successfully comply with the Government requirements will be developed over the coming months and will consider the impact on crime and disorder.

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## **10. Financial Considerations**

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- 10.1 Simpler Recycling aims to significantly improve recycling services as well as introduce nationwide consistency. Government has committed that the additional requirements will be funded in two ways:
- I. All costs relating to packaging waste and recycling costs will be met through packaging Extended Producer Responsibility (pEPR) payments from packaging producers;
  - II. All other new requirements on councils will be funded by Government under the New Burdens doctrine.
- 10.2 DEFRA has allocated the Council an initial estimated £1,573,000 in pEPR payments based on a modulated figure using 2021 recycling figures for the financial year 2025/26.
- 10.3 Whilst the pEPR payment may still change, in order to provide certainty to authorities, the UK government is guaranteeing that in 2025/26 the Council will receive at least the amount displayed above.
- 10.4 Payments in future years may be linked to the collection model, recycling performance and/or costs.
- 10.5 The current cost for operating the Mixed Recycling service is c £1.3m pa. There would be a c. £0.1m pa additional cost to IBC for a Co-mingled option due to the high likelihood of additional material within the recycling bin resulting in additional trips by the refuse collection vehicles to the MRF. There would be a c. £0.23m pa additional cost to IBC associated with a Twin Stream service due to the costs associated with the supply, distribution and ongoing maintenance of the additional bins. Additional costs will be covered by the pEPR payment.
- 10.6 If a Twin Stream Model is the chosen approach, the Council will fund the additional bins required for Twin Stream through the existing framework and method for purchasing wheeled bins using capital borrowing over 10 years. The total amount is £1,772,884 and this will require a payback of £226,270 per annum. This cost will be a one-off purchase and any replacements for damaged, lost or stolen bins will be processed via the replacement policy at that time.
- 10.7 The Council would need to arrange for delivery of these bins to approximately 63,000 households. This would be completed either with the procurement of an outsourced specialist delivery distribution company or using additional staffing resource and vehicles managed by the Waste Service at Layard House.

10.8 The below table identifies the capital and revenue implications associated with the implementation of a Twin Stream collection model if the inhouse delivery option is preferred.

**Table 1 – In house delivery**

<b>Twin Stream Bins Delivered in house</b>	<b>2025/26 (£)</b>	<b>2026/27 (£)</b>	<b>2027/28 (£)</b>	<b>2028/29 (£)</b>	<b>2029/30 (£)</b>
Capital Setup Cost	1,772,880				
<b>Total Capital Cost</b>	<b>1,772,880</b>				
MRP*		141,280	148,270	155,610	163,310
Interest*		84,990	77,990	70,650	62,950
Total Capital Charge to Revenue	-	226,270	226,260	226,260	226,260
Estimated Delivery Cost	236,000				
<b>Net Cost to General Fund</b>	<b>236,000</b>	<b>226,270</b>	<b>226,260</b>	<b>226,260</b>	<b>226,260</b>
<b>Council Tax Band B Equivalent</b>	<b>4.56</b>	<b>4.37</b>	<b>4.37</b>	<b>4.37</b>	<b>4.37</b>

*\*MRP & Interest are based on 10 year borrowing and interest rates were provided on 07/02/25.*

10.9 The below table identifies the capital and revenue implications associated with the implementation of a Twin Stream collection model if an externally contracted delivery service is preferred.

**Table 2 – Externally contracted delivery service**

<b>Twin Stream Bins External Delivery</b>	<b>2025/26 (£)</b>	<b>2026/27 (£)</b>	<b>2027/28 (£)</b>	<b>2028/29 (£)</b>	<b>2029/30 (£)</b>
Capital Setup Cost	1,772,880				
<b>Total Capital Cost</b>	<b>1,772,880</b>				
MRP*		141,280	148,270	155,610	163,310
Interest*		84,990	77,990	70,650	62,950
Total Capital Charge to Revenue	-	226,270	226,260	226,260	226,260
Estimated Delivery Cost	354,000				
<b>Net Cost to General Fund</b>	<b>354,000</b>	<b>226,270</b>	<b>226,260</b>	<b>226,260</b>	<b>226,260</b>
<b>Council Tax Band B Equivalent</b>	<b>6.84</b>	<b>4.37</b>	<b>4.37</b>	<b>4.37</b>	<b>4.37</b>

*\*MRP & Interest are based on 10 year borrowing and interest rates were provided on 07/02/25.*

10.10 It is proposed that £1.8m is added to the 2025/26 Capital Programme for the procurement of additional bins required. The ongoing revenue costs associated with this investment will be updated during the MTFP 2026/27 budget setting process.

- 10.11 The one-off revenue cost of £236k or £354k for the delivery of the bins in 2025/26 will be funded by the pEPR grant.

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## **11. Legal Considerations**

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- 11.1 The Environment Act 2021 amended the Environmental Protection Act 1990 to include new requirements relating to the separate collection of waste in England.
- 11.2 Where appropriate Public Sector Procurement Frameworks will be used that are fully compliant with public procurement regulations, helping to reduce procurement complexity and risk. The use of Public Sector Procurement Frameworks is fully compliant with the Council's Contract Standing Orders.
- 11.3 Where it is not deemed appropriate for officers to use Public Sector Procurement Frameworks the tender processes will comply with the Council's Contract Standing Orders and with UK procurement legislation.

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## **12. Performance Monitoring**

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- 12.1 Simpler Recycling is considered a key project by the Council's Corporate Management Team (CMT) and is subject to the oversight and governance of CMT on an ongoing basis.
- 12.2 The Council's Head of Waste and Fleet services will be responsible for leading the procurement of any required wheelie bins in conjunction with the Council's finance, procurement and legal teams.
- 12.3 Executive is recommended to approve that a Councillor Working Group is formed to consider officer proposals for the public communications campaign that will be needed in order to prepare Ipswich residents for the changes they need to make as a result of the implementation of Simpler Recycling.
- 12.4 The Council's recycling performance will be reportable to DEFRA and will continue to be subject to Overview and Scrutiny as part of the annual Portfolio meeting.

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## **13. Conclusions**

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- 13.1 Government has legislated for major reforms to waste collection and packaging, requiring councils to align their waste and recycling services with new nationwide Simpler Recycling requirements. For Ipswich Borough Council this will mean adding a new weekly collection of food waste and enhancing recycling to also collect glass bottles & jars and cartons (Tetrapak) by 31st March 2026, then also plastic film by April 2027.

- 13.2 Due to what are expected to be extended lead times on the manufacture and supply of bins, if the Twin Stream model is adopted it is considered prudent to undertake the procurement of bins as early as possible to ensure that orders are placed which ensures that deliveries are received at least 6 months prior to commencement of the service.
- 13.3 If the Twin Stream model is adopted the Council would need to arrange delivery of additional bins to approximately 63,000 households. This would be completed either with the procurement of an outsourced specialist delivery distribution company or using additional staffing resource and vehicles managed by the Waste Service at Layard House.

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## **14. Recommendations**

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### **That Executive:**

- 14.1 **Notes the Government has legislated for major reforms to waste collection and packaging, requiring councils to align their waste and recycling services with new nationwide Simpler Recycling requirements from 1<sup>st</sup> April 2026.**
- 14.2 **Authorises the Head of Waste and Fleet, in consultation with the Portfolio Holder for Environment and Transport, to commence planning for and implementation of the recommended Twin Stream Mixed Recycling model along with the recommended continuation of the fortnightly residual waste collections.**

Reason: to implement a compliant mixed recycling collection service by 31<sup>st</sup> March 2026.

### **Subject to 14.2:**

- 14.3 **Authorises the Head of Waste and Fleet, in consultation with the Portfolio Holder for Environment and Transport, the Head of Procurement, the Head of Legal and Head of Finance, to undertake the procurement for the additional bins and distribution method required, to be undertaken through the use of Public Sector Procurement Frameworks and/or open tender, either in isolation, and/or in conjunction with other Suffolk local authorities, and/or acting as lead authority in any part of the procurement for all the Suffolk local authorities.**
- 14.4 **Recommends to Council approval of an additional £1.8m to be included in the Capital Programme for 2025/26 to make financial provision for the procurement of the additional bins required.**
- 14.5 **Authorises the Assistant Director for Operations, in consultation with the Portfolio Holder for Resources and the Portfolio Holder for Environment and Transport, Section 151 Officer, Head of Legal and Head of Procurement, to enter into contracts for the supply of bins**

**and the distribution method required to implement a compliant recycling collection service by 31st March 2026, provided that it is within the budget set out in paragraph 10 of this report.**

**OR:**

- 14.6 Reserves the contract award to Executive and requests that the Head of Waste and Fleet brings a further report to a future Executive meeting to enable this decision.**

Reason: To ensure that the Council avoids delay and supply chain issues in the procurement of bins to implement a compliant recycling collection service by 31<sup>st</sup> March 2026.