



South London Waste Partnership Joint Committee Agenda

Thursday 23 July at 19:00

Location: A virtual meeting which members of the public can view online at this link: <https://www.youtube.com/c/kingstoncouncil/videos>

Published: 15 July

Members of the Committee

London Borough of Croydon

Councillor Stuart Collins - Deputy Leader and Cabinet Member for Clean Green Croydon
Councillor Stuart King - Cabinet Member for Environment, Transport & Regeneration (Job share)

Substitutes: Councillors Muhammad Ali and Nina Degrad

Royal Borough of Kingston upon Thames

Councillor Hillary Gander - Portfolio Holder for Environment & Sustainable Transport
Councillor Tim Cobbett – Deputy Leader and Portfolio Holder for Communities and Engagement

Substitutes: Councillors Dave Ryder-Mills and Malcolm Self

London Borough of Merton

Councillor Mark Allison – Deputy Leader and Cabinet Member for Finance
Councillor Stephen Alambritis, Leader of the Council

Substitutes: Martin Whelton

London Borough of Sutton

Councillor Manuel Abellan - Chair of the Environment & Neighbourhood Committee
Councillor Ben Andrew – Vice-Chair of the Environment and Neighbourhood Committee

Substitute: Councillor Hanna Zuchowska

This agenda is also available to view on:

www.croydon.gov.uk

www.sutton.gov.uk

www.merton.gov.uk

For enquiries on this agenda please contact: Henry Yellop tel: Tel: 020 8547 5846 / email: henry.yellop@kingston.gov.uk. This is a public meeting and viewership by the public is encouraged and welcomed. If you wish to submit a question, please contact: henry.yellop@kingston.gov.uk **Questions must be submitted by 10:00am the day before the meeting (10:00am - Wednesday July 22). In the event of several very similar questions, these will be answered with a single encompassing response.**

Note on declarations of interest

Members are advised to declare any Disclosable Pecuniary Interest in any matter to be considered at the meeting. If a pecuniary interest is declared they should withdraw from the meeting room during the whole of the consideration of that matter and must not participate in any vote on that matter. If members consider they should not participate because of a non-pecuniary interest which may give rise to a perception of bias, they should declare this, withdraw and not participate in consideration of the item.

Agenda

1. **CHAIR HANDOVER**
2. **WELCOME AND INTRODUCTIONS**
3. **APOLOGIE FOR ABSENCE**
4. **Minutes of the previous meeting** **Appendix 1**
To approve the minutes of the previous SLWP meeting held on 4 February 2020 as a true and correct record.
5. **Declarations of interest**
6. **Phase A & B Contract Management Report** **Appendix 2**
To note the contents of the report, and comment on any aspects of the performance of the Partnership's Phase A & B contracts.
7. **SLWP Budget Outturn 2019-20** **Appendix 3**
To note the contents of this report
8. **Budget Update – Month 3 2020/21** **Appendix 4**
To note the contents of this report
9. **Viridor Fire Report July 2020** **Appendix 5**
To note the contents of this report
10. **JWC Communications and Engagement – SLWP Phase A & B Contracts** **Appendix 6**
To agree the 2020-2022 SLWP Communications Strategy document. To also note the contents of this report and comment on any aspects of communications and engagement activities relating to Phase A & B contracts.
11. **JWC Risk Report July 2020** **Appendix 7**
To note the contents of this report.
12. **Exclusion of the Press and Public**
13. **Dates of the next meetings**
 - 9 September 2020
 - 17 December 2020
 - 13 April 2021
 - 8 June 2021

This page is intentionally left blank

South London Waste Partnership Joint Committee

Meeting held on Tuesday, 4 February 2020 at 6.30 pm in F10, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

- Present:**
- London Borough of Croydon**
Councillor Stuart Collins – Deputy Leader and Cabinet Member for Clean Green Croydon (Chair)
Councillor Stuart King – Cabinet Member for Environment, Transport & Regeneration (Job Share)
 - Royal Borough of Kingston Upon Thames**
Councillor Hilary Gander – Portfolio Holder for Environment and Sustainable Transport
 - London Borough of Merton**
Councillor Mark Allison – Deputy Leader and Cabinet Member for Finance
Councillor Tobin Byers – Cabinet Member for Adult Social Care, Health and Environment
 - London Borough of Sutton**
Councillor Manuel Abellan – Chair of the Environment and Neighbourhood Committee
Councillor Ben Andrew – Vice-Chair of the Environment and Neighbourhood Committee
- Apologies:** Councillor Liz Green – Leader of the Royal Borough of Kingston upon Thames Council.

PART A**1/20 Welcome and Introductions**

The Chair welcomed all present including members of Extinction Rebellion Sutton and Croydon.

It was noted by the Chair that Extinction Rebellion had done a great deal of work to shine a light on the important issue of waste reduction and reuse and welcomed their activity and ideas. The four boroughs, it was stated, had shared aims of increasing reuse and recycling and managing non-recyclable waste as responsibly as possible. As such, the Chair welcomed members of Extinction Rebellion to meet with officers of the South London Waste Partnership to discuss their ideas and learn more about the technical details of the Partnership's work.

Members noted that whilst recycling rates nationally were stagnating, the South London Waste Partnership area was bucking the trend, was well above the London average and the ambition was to continue this upward trend.

Whilst it was recognised that a number of residents had concerns in relation to the Energy Recovery Facility (ERF) in Beddington, it was noted that the process uses waste to generate electricity for the National Grid, low-carbon heating and hot water supplies for nearby homes and significantly reduces carbon emissions (or equivalent) when compared with landfill. As a Partnership, the Chair stated it would explore new waste treatment technology as it arose as it was important to the boroughs to continue to evolve.

Members of the public were informed that the Partnership was not a legal entity, rather it was a voluntary partnership of the four boroughs which enabled a synergy of messages and waste collection. Furthermore, the Partnership allowed for ideas to be shared, resources to be maximised and benefits achieved.

All four boroughs of the Partnership boroughs had declared a Climate Emergency and the Chair reiterated that Extinction Rebellion's attendance was welcomed and further welcomed the sharing of ideas and knowledge to achieve the shared goal of a reduction in waste and increase in recycling.

2/20 Apologies for Absence

Apologies were received from Councillor Liz Green – Leader of the Royal Borough of Kingston upon Thames Council.

3/20 Declarations of Interest

There were no declarations of interest.

4/20 Minutes of the Previous Meeting

The minutes of the meeting held on 17 September 2019 were signed and agreed as an accurate record of the meeting.

5/20 Urgent Business (If Any)

There were no items of urgent business.

6/20 Contracts Update

The Contract Manager for the South London Waste Partnership presented the update report to the Committee. Section 2.5 of the report was highlighted as showing that 83% of Housing Reuse and Recycling Centre (HRRC) users experienced a wait time of less than five minutes.

Whilst recycling markets continued to be challenging there had been a 1% increase in recycling rates at the HRRC sites which was welcomed. The Partnership additionally continued to work with Veolia to trial new ways of working to further increase recycling rates.

Bags splitting was noted as an area that the contractor continued to work on by asking residents to split their bags and the recyclable waste into the appropriate bins across the site. This work, it was hoped, would reiterate that the HRRC sites were recycling points and not just disposal sites.

The Contract Manager noted that the commercial waste clamp down corresponded with a 7% reduction in wood waste, 27% drop in rubble tonnage and 38% reduction in plasterboard tonnage. This reduction in commercial waste had helped the Partnership save over £40,000 year-to-date.

Members noted that the composting contract was operating well and that there were no issues to report.

In terms of the Viridor contract, the residual waste treatment contract, 135,000 tonnes of residual waste had been delivered to the Beddington site between 1 April 2019 and 30 November 2019 which was a drop of 5% for the same period the previous year.

In response to Member questions, the Contract Manager confirmed that the Partnership had been in discussion with the contractor to expand the reuse opportunities. The reuse shop at Kimpton was noted as taking items from all HRRC sites across the four boroughs, repairing and reselling. The Chair stated that this was excellent work and further noted the Library of Things in Upper Norwood as an example of a reuse shop. Members requested that there was a communications piece on the reuse opportunities so members of the public were aware of the opportunities.

Members noted that the commercial waste pilot had been successful in Sutton and were informed that bespoke schemes had been rolled out in all four boroughs which would respond to customer needs. Additionally, in response to Member questions, officers confirmed that there had been no significant increase in flytipping in response to the clamp down of commercial waste at the HRRC sites.

Members noted at paragraph 4.5 of the report that there had been several carbon monoxide exceedances at the ERF although no enforcement or suspension notices had been issued as the site was operating in accordance

with its Environmental Permit. Officers confirmed that in recent months, there had been a number of temporary exceedances of a half-hourly average for carbon monoxide (CO) at the Beddington ERF. In each circumstance, the level of carbon monoxide increased above the permitted limit temporarily before quickly (usually within a matter of seconds) returning to permitted operating conditions. The Environment Agency was notified on each occasion. It was further noted by the Partnership that the Chair had written to the Environment Agency (EA) in 2019 in relation to the carbon monoxide exceedances at the ERF and the EA's response had been that *“an extremely high level of [CO] emissions over a prolonged period of time would be needed in order to have a significant impact on the environment, whereas slightly elevated emissions over a short-duration are not likely to result in any measurable environmental impact.”*

The Strategic Partnership Manager provided the committee with a statement in relation to the fire at the Beddington site in the summer of 2019:

“The Chair of the Joint Committee and officers from the South London Waste Partnership (SLWP) met with Viridor on 28 January 2020 to receive an update on where we are with the investigation and report into the fire that occurred at the Beddington Waste Transfer Station in July 2019.

“Viridor has conducted a thorough investigation into what happened and presented a draft of their internal Incident Report to us. This was reassuringly thorough. We were particularly pleased to see that Viridor recognised this was a 'significant' incident and that they have implemented a number of changes to procedures on site in order to mitigate the risk of a similar event happening in the future. This includes improved management (including thermal imaging) of any residual or bulky waste being stored in the waste tunnels.

“Unfortunately Viridor are not yet in a position to finalise and formally share their Incident Report with the SLWP as they are still awaiting input from the London Fire Brigade (LFB) and the Environment Agency (EA). Both agencies have provided interim reports (in the case of the LFB, a 'Confirmation of Attendance Report' and in the case of the EA a 'Compliance Assessment Report'). But both the LFB and EA have confirmed to Viridor that further submissions will be made. We are satisfied that Viridor has cooperated fully with all relevant agencies and that any delays, whilst frustrating, cannot be attributed to them.

“We hope that by the next time the Joint Committee meets, both the LFB and EA will have made their final submissions in relation to this matter and that Viridor have been able to finalise and formally share their report with us.”

In response to the statement, the Chair informed the Committee that once the reports were available there would be an item of the Committee agenda to discuss the incident. At that meeting, the Chair would allow public questions on the report as it was recognised that it was important that information was publically available and that the contractor was accountable.

A member of the public stated that they had been informed that the LFB had completed two reports; that the first report would cost over £100 to gain a copy and that the second report was an internal report only. It was requested that copies of these reports were made available. Furthermore, it was stated that the EA had cleared two reports, the first of which had been shared and

the second had been held up since November 2019 due to the operator (Viridor) objecting to the contents.

The Chair shared the member of the public's frustrations at not receiving the reports and confirmed that the reports would be chased and the claims investigated. It was the understanding of the Partnership that one report from each agency (EA and LFB) had been finalised and that Viridor had not objected to these reports, however this would be looked into.

In response to a question from a member of the public relating to the ERF contract, the Strategic Partnership Manager confirmed that it was possible for the contract with Viridor to be varied and that this could, for example, enable the Partnership and provider to keep up with requirements or new technologies. The Chair informed the public that they would be invited to attend workshops to discuss future opportunities to ensure the Partnership continued to deliver for residents.

RESOLVED: To note the contents of the report.

7/20 **Budget Update 2019/20**

The Finance Lead for the South London Waste Partnership presented the updated finance position of the partnership and informed the Committee that there was a projected underspend for 2019/20 of £25,000 for Strategic Management activities.

RESOLVED: To note the contents of the report.

8/20 **Budget 2020/21**

The Strategic Partnership Manager presented the final budget for the Partnership for its core activities in 2020/21.

RESOLVED: To agree the final budget for the core activities of the Partnership as set out at paragraph 2.3 of the report.

9/20 **Communications Update**

The Chair thanked the Communications Advisor for his work in developing the 'Destination: Recycling' videos which showed the journey of waste once collected from the kerbside as it had helped residents' understanding of the importance of recycling.

The Communications Advisor outlined communications activity which had taken place since September 2019. Three campaigns had been undertaken, including 'Destination: Recycling', Recycle Week 2019 and Give Food Waste a Fright. The 'Destination: Recycling' social media campaign had been very

successful with over 250,000 views of the 15 second clips, over 10,000 click-throughs to the Partnership website and over 1,800 views of 30 second+ of the videos. The videos had been well received and remained relevant so Members were requested to continue using them to support understanding of recycling.

During Recycling Week an outdoor advertising campaign was run which was funded through a £10,000 bid to Resource London. The campaign ran in all four boroughs, on the tram network and in Kingston and Croydon town centres. Additionally, Veolia ran a series of school visits in the lead up to and during Recycling Week.

Finally, in terms of the Give Food a Fright Campaign which was a series of food waste engagement events which took place in October 2019 and were funded through a £26,000 bid to Resource London. The campaign used pumpkins as the hook as they were a good example of food waste as many people did not use the vegetable they cut up to use as a lantern. Four highly successful pop-up events were held which enabled over 1,800 face-to-face engagements to take place and almost 200 written pledges by residents to reduce their food waste.

Members were informed that user satisfaction levels at HRRCs continued to be positive. It had been noted that some residents were taking waste which could be recycled at the kerbside to these centres and so a leaflet would be developed to be handed out at the HRRC sites to inform residents of what they could recycle at home and encourage them to sort through their recycling.

The Communications Advisor informed Members that Viridor continued to provide regular community updates on progress to restore the Beddington Farmlands, including the installation of swift nesting boxes and initial work to enable wetland grasslands to be formed in spring 2020.

Emissions data from the Energy Recovery Facility (ERF) continued to be uploaded to the Beddington ERF Virtual Visitor Centre; however it was noted by the Communications Advisor that there had been a delay in uploading the data from the second half of December 2019 which Viridor had advised was due to a technical difficulty. The Partnership had been assured that this had subsequently been rectified and the data had been posted to the website.

The Committee noted that a variation to the Beddington ERF permit had come into effect from 1 January and Members were informed that the reasoning was included in the Viridor January emission monitoring report. The change had been recommended by the Environment Agency (EA) and brought the site in line with industry standard monitoring periods.

The Education Centre at the Beddington site had begun to host stakeholder visits and the first school visit was due to take place in the coming weeks. The Committee were informed that school visits could be arranged via the Virtual Visitor Centre or requests could be made to the Communications Advisor.

The Chair thanked officers for their work to increase engagement with residents in regard to recycling and noted that in Croydon over 14,000 young people had been spoken to about recycling and their responses had been positive. It was noted that engaging with young people was very worthwhile to not only increase their recycling rates but also their families.

Members noted that the reach of the campaigns had been very successful and the use of the funding had been very good.

The Committee appreciated hearing the explanation for the delay in reporting the emissions data in December and sought clarification that it would be a one-off technical issue only. The Communications Advisor stated that Viridor had confirmed it had been a technical issue only but that this would be monitored by the Partnership. It was further noted that the approach taken by Viridor to publishing emissions monitoring data at the Beddington ERF was one of the most open and transparent of any facility in the country..

A member of the public noted that over the previous six months the emissions data from Viridor there had been only one month where there had not been a breach, furthermore it was stated that a number of the emissions reports had been delayed. The Chair reiterated that the Beddington ERF had a higher than normal level of transparency and the Partnership had sought an apology and explanation to the delay in publishing the data.

In response to public questions, the Chair stated that the four councils were working towards zero carbon and that the emissions from the ERF were lower than if the trucks full of waste were driven to an alternative site in the south east. As part of the commitment to work towards zero carbon, the Partnership would also look at procuring electric vehicles when a new fleet was procured.

In response to a public question, the Strategic Partnership Manager stated that there were a number of future scenarios that the Partnership would need to consider, including if there was zero waste. There had been a reduction in waste collected in south London which the Partnership was proud of and desired to see reduce further. The Strategic Partnership Manager stated that there was flexibility in the contract which would enable the Partnership to respond to future situations. The Strategic Partnership Manager stated they would be happy to meet with members of the public to discuss the scenarios and ideas to reduce waste.

The Committee stated that they were committed to reduce levels of waste and promote recycling. They welcomed the contributions of members of the public on how best to promote higher levels of recycling and lower levels of waste to help combat the four council's declared Climate Emergencies.

In terms of the scenario put forward by members of the public that there was no waste being produced by the four boroughs, members of the committee suggested that the ERF would likely not operate as there would be a national trend of reduced levels of waste. It was noted that it would be highly unlikely

that south London boroughs would have zero waste and the surrounding area would continue producing waste as much of the waste levels were driven by national trends and policy.

Members of the public noted that young people were very receptive to the idea of recycling, however concerns remained in terms of contamination and as such it was suggested that more communications were required to clarify which bin certain items went into. The Communications Advisor agreed that there was uncertainty; however noted that it was important to find the right balance in terms of the level of information provided as it was important that people were not scared away from recycling. It was noted that there was a thirst for information to avoid contamination and as such the Partnership was looking to develop the information circulated to residents. The Chair requested the support of the public in the Partnership's goal to lobby the government for more messaging on recycling and anti-flytipping to further support the goal of less waste.

In response to questions regarding schools and restaurants waste the Communications Advisor informed those present that each school and restaurant would have their own commercial waste contract, many of which were not within the remit of the Partnership. It was recognised, however, that many of these organisations would find themselves under pressure to reduce their wastage and any reduction in waste was supported by the Partnership.

RESOLVED: To note the contents of the report.

10/20 **Social Research Findings**

The Communications Advisor provided the Committee with a presentation, a copy of which was included within the agenda papers. The presentation gave an overview of the results of a survey undertaken by the independent research company, DJS Research, which included over 1,000 telephone interviews across the four boroughs and 350 booster surveys around the Beddington site. The Committee were informed that the results of the survey were compared the previous four surveys which had been undertaken and would help inform the development of the Communications Strategy which would be taken to the next meeting of the Committee.

Highlights from the survey were raised by the Communications Advisor and included; a significant increase in residents' commitment to recycle since 2010 however a lower level of commitment from those aged 16 to 34 which was concerning and would require addressing (although progress had been made with this age group since the last survey in 2016).

Driven by significant changes to collection services the survey found that residents felt they were recycling more and producing less waste. This had been reflected in the levels of tonnage of waste collected, however it was

positive to see that residents felt that there had been a change in their behaviour.

It was noted that the survey raised a concern that fewer people, 38% from 43%, felt that their own individual efforts 'made a difference'. The Communications Advisor stated would be an area of focus in future years.

Members noted that residents were increasingly becoming more realistic in terms of the amount of their waste which was being recycled and realistic ambitions for recycling rates in the next five years' time. It was felt that this would help future information campaigns. It was further encouraging that 96% of respondents felt it was important that there was a reduction in the amount of waste sent to landfill.

The survey included a question of what should be done with non-recyclable waste and it was noted that a third of responders suggested it should be burnt/incinerated/treated to recover energy. It was stated that there was no prompting when the question was asked. A subsequent question was whether the resident was aware of the Energy Recovery Facility (ERF) in Beddington; overall 32% of respondents were aware of the site with the figure rising to 43% in the six wards closest to the site. Once prompted, it was noted that 66% of residents surveyed agreed that incineration was a good option for non-recyclable waste.

Given the large changes to the waste collection and street cleaning services, the survey included questions on these services and found a net satisfaction rate of 64% for waste collection. The Communications Advisor stated that the satisfaction rate should increase as the services bed in and that the current level was not bad given the level of change. In terms of street cleanliness the satisfaction level was only 54% on residential roads and dropped to 46% for town centre streets. It was stated that the Partnership wanted to see those levels increase as the service beds in.

Members of the public questioned whether the Communications Strategy, which was being developed, would align with the goal of zero carbon and be ambitious in encouraging people to achieve this. The view of the member of the public was that, in order to support the zero carbon ambitions, communications would need to be changed from the ERF being the best option for waste disposal at the present time. Furthermore, members of the public stated that the report was disingenuous as there had not been any information about the negative impacts of the ERF which would help to inform members of the public.

In response to questions from the public, the Strategic Partnership Manager stated that businesses had the opportunity to arrange their own waste collection contracts and so it was not always possible to encourage them to reduce their waste also, however it was an area the Partnership could look into.

The Communications Advisor, in response to questions from members of the public stated that it was in fact cheaper for the councils to recycle than to send waste to the ERF as well as being the preferred option in terms of the environment. Furthermore, it was noted that the report outlined the results of a survey on residents' views only and it would not be possible to provide information at the same time as that could skew the results. It was an information gathering exercise as opposed to a communications one - the results would inform the Partnership's Communications Strategy which would aim to inform and persuade.

Concerns were raised by members of the public in relation to the ERF and the information available, whilst the Chair stated that he personally had not always been in total agreement regarding the ERF, the Partnership was working together as it was recognised that incineration was better than landfill. The officers of the Partnership sought to work towards the best outcomes for the four councils and to work towards the key objectives of reduce, reuse, recycle. To support those objectives and to ensure the Partnership was able to respond to changes in technology there was flexibility written into the contract.

In response to Member questions the Communications Advisor stated that they did not have the data on which respondents lived in houses or flats and the different responses. Recycling from flats was, nonetheless, an area of focus for the Partnership as it was recognised that there were greater levels of contamination at flat recycling facilities and it was imperative that contamination levels were reduced. It was further recognised that living conditions, such as communal housing, limited space and house sharing could have an impact on younger people's commitment to recycle.

RESOLVED: To note the findings of the social research project.

11/20 **Risk Report**

The Strategic Partnership Manager introduced the report which summarised the key risk areas which were facing the partnership boroughs in relation to the waste disposal functions of the Committee.

Market changes for recycling materials remained a significant risk as the value of some recycling materials had decreased considerably. This reduction in value had a potential impact on borough budgets as some materials had the potential to generate income. Members were informed that the Partnership continued to monitor the market and the risk would be managed through budget and contract management processes. Furthermore, it was noted that it was important to ensure the quality of recycled materials was maintained to reduce any potential impact on the cost of processing the materials. As such, reducing contamination of recycled material would form an important part of the Communications Strategy that was to be developed.

Members were informed that the Partnership continued to manage and monitor the impact of recycling value changes on its contracts also as it was noted that the contracts would only operate well if they were financially sustainable.

The Strategic Partnership Manager noted that Defra had run a consultation which closed in May 2019 which the Partnership had responded to. The final outcome of the consultation was to be released, however the Partnership continued to manage the risks and opportunities presented by the proposals. In response to Member questions, the Strategic Partnership Manager stated that they were of the understanding that Defra were looking at pursuing policies on plastic packaging however a timescale had not been announced.

In terms of the risk from Brexit, the Strategic Partnership Manager noted that the report had been written before 31 January 2020, and since the UK's exit from the European Union the Partnership had not experienced or anticipated any impact during the transition. Members were informed that they would continue to work with contractors to mitigate any potential impacts once the transition period ends.

RESOLVED: To note the contents of the report.

12/20 **Date of the next Meeting**

RESOLVED: To note the next meeting will be held on Tuesday 21 April 2020 at 6.30pm at Croydon Council.

13/20 **Exclusion of the Press and Public**

This item was not required.

The meeting ended at 8.24 pm

Signed:

Date:

.....
.....



Report to: South London Waste Partnership (SLWP)
 Joint Waste Committee

Date: 23rd July 2020

Report of: SLWP Management Group

Author(s): Andrea Keys Interim Strategic Partnership Manager

Chair of the Meeting: Councillor Hilary Gander

Report title:

Phase A & B Contract Management Report

Summary:

This report provides Joint Waste Committee with an update on the performance of the Phase A and Phase B Contracts procured and managed by the South London Waste Partnership:

Contract 1 - Transport and Residual Waste management

Contract 2 - HRRC services - HRRC site management and material recycling

Contract 3 - Marketing of recyclates and treatment of green and food waste

Phase B - The 2012 Residual Waste Treatment Contract (the ERF Contract)

This report provides performance data for the period 1st April 2019 to the 31st March 2020.

Recommendations:

Joint Waste Committee is asked to note the contents of this report, and comment on any aspects of the performance of the Partnership's Phase A & B contracts.

Background Documents:

Contract Performance Monitoring updates have been presented to the Joint Waste Committee since 22 July 2010. The most recent reports were presented at the meeting in February 2020 by the Contract Manager, Andrea Keys.

BACKGROUND

- 1.1. **Phase A: Contract 1** is operated by Viridor Waste Management Ltd and includes the bulking and haulage of material until August 2022. (The disposal element of this contract ceased on the 3rd March 2019 and since the 4th March 2019 the residual waste has been managed through the Residual Waste Treatment Contract operated by Viridor South London Ltd (also referred to as the Phase B ERF Contract)).
- 1.2. **Phase A: Contract 2**, the HRRC service is operated by Veolia (ES) (UK) Ltd. The contract commenced on the 1st October 2015, has a 7 year initial term, and includes the management of the 6 Partnership HRRC sites in addition to the marketing of recyclates collected at each of the sites.
- 1.3. **Phase A: Contract 3** is operated by Viridor Waste Management Ltd and includes the composting of garden and food waste until August 2022.
- 1.4. The London Boroughs of Croydon, Sutton and Merton direct deliver kerbside collected residual, garden and food waste into the Beddington site, operated by Viridor.
- 1.5. The Royal Borough of Kingston (RBK) direct delivers kerbside collected residual, recyclates, garden waste and food waste into the Kingston Villiers Road Waste Transfer Station (WTS). The WTS is operated by Viridor under both the Residual waste treatment contract and Contract 1.
- 1.6. **Phase B: Residual Waste Treatment Contract** - Viridor South London Limited ('Viridor SL') was formally awarded a contract for the treatment and disposal of residual waste in November 2012. The Contract involves Viridor designing, building and operating an Energy Recovery Facility (ERF) which will remain in its ownership and through which it will dispose of suitable and permitted municipal residual waste arising in the South London Waste Partnership area.

PERFORMANCE DETAIL

- 1.7. **Contract 1: Waste transfer station bulking and haulage (Viridor Waste Management Limited)**
- 1.8. Contract 1 includes waste transfer station operations and bulk haulage services only. The Contract is operating effectively and there are no issues to report.
2. **Contract 2: Management of the Household Reuse and Recycling Centres (Veolia (ES) (UK) Ltd)**
- 2.1. **HRRC Contract Performance Review:** The scope of the HRRC services can be summarised in three parts: the general management of the sites including staffing, plant, equipment, and site layouts; the transportation of

materials; and the recycling, treatment, and/or disposal of waste collected at the HRRC sites (excluding garden and residual waste).

- 2.2. The contract specification focuses on three key performance categories; site user experience, health and safety, and material recycling.
- 2.3. **HRRC Site Closures March 2020** - Following government guidance and the subsequent Health Protection (Corona, Restrictions) (England) Regulations 2020, on the 24th March 2020 the SLWP partner boroughs, together with all other London boroughs, made the decision to close the HRRCs to public access on the basis that travel to the HRRCs did not fit with the 'essential travel only' and 'reasonable excuse' restrictions set out in government guidance and the subsequent regulations.
- 2.4. The boroughs considered whether there would be any grounds for visiting the HRRC due to a risk to health or safety as a result of a build-up of waste. Boroughs considered that whilst kerbside services continued to collect waste, food, and recycling, and fly tipped tonnes were still within serviceable levels, no public environmental health impact requiring the critical use of the HRRCs was identifiable, and, should such circumstance arise, boroughs would be able to make special collection arrangements without requiring a resident to make a journey to an HRRC. On this basis it was deemed unlikely that access to the HRRC service could be classed as 'critical' or 'essential'. The reopening of the HRRCs was kept under constant review, and following further government guidance, SLWP supported the boroughs with the reopening of the sites on the 13th May 2020. SLWP worked collaboratively with boroughs to create a booking system for the Kingston, Merton and Sutton sites, and supported Corydon with an enhanced traffic management scheme at the three Croydon sites.
- 2.5. **Site user experience:** Veolia started customer satisfaction surveys in July 2016 to monitor site user experience. Customer satisfaction questionnaires are undertaken for two weeks at the six sites in turn for each round, table 2a of Appendix A details the dates for each round. Table 2b summarises the top 8 general comments made by customers at the end of the questionnaire.
- 2.6. The Contract requires customer satisfaction levels of 80% and above at each of the sites. The key questions from the survey are detailed in tables 2c, d, e and f of Appendix A, and a full list of responses, split-out by borough, are now available on-line via the SLWP website.
- 2.7. Results from round 14 and 15 of the customer satisfaction surveys show that across the partnership the 80% target was achieved. However, it should be noted that the Customer Satisfaction surveys were suspended on the 24th March 2020 when the sites were closed, as detailed above, so the survey results are limited.
- 2.8. **Recycling Performance analysis** - Detailed analysis undertaken by the SLWP each month looks at materials recycled, recycling markets, and the

impact of the wider SLWP recycling services, in order to better understand HRRC recycling rates and assess the Contractor's performance.

- 2.9. Table 3a of Appendix A details the recycling performance by site and by month (please note the year end performance figure is based on the raw tonnage data, not an average of the recycling performance per month). At the end of quarter four the combined performance at the SLWP HRRC sites was 66.4%, a marginal improvement on last year.
- 2.10. Table 3b in Appendix A uses data from the last three years in order to compare performance year-to-date with previous years. The blue bar shows the recycling performance for the current year, and the yellow and orange bars show recycling performance for the same period in the previous two years. The dotted line and accompanying numbers in this graph show last years end of year recycling performance for each site.
- 2.11. Table 3b shows that the end of year recycling rate has improved, marginally, at all sites when compared to the previous year 2018/19, and Villiers Road and Purley Oaks exceeded the 70% recycling target. Whilst the sites were closed to the public for the last week of the reporting period, as detailed above, it is unlikely that this would have made a significant impact on the recycling rates.
- 2.12. The Kimpton recycling center in Sutton achieved a recycling rate of 63% for 2019/20. Wood waste tonnes were down by 6% for the period being reported which had a negative impact on recycling rates. This drop in wood could be attributable to the commercial waste clamp down as the drop in wood waste was combined with a 23% reduction in rubble and a 6% drop in residual waste. The Kimpton recycling center saw a 9% drop in green waste in 2019/20, however, it is also worth noting that in the same reporting period, Sutton's total borough green waste increased by 4%. It could therefore be assumed there has been a shift in customer behavior with more residents choosing to recycle green waste at the kerbside (via the subscription-based collection service), rather than driving to the recycling center. Overall, the recycling rate at Kimpton Parkway shows a marginal improvement on last year.
- 2.13. Garth Road achieved a recycling rate of 64% for the reporting period 2019/20. This site has seen a 2% drop in green waste collected at the HRRCs when compared to the same period in 2018/19. The total green waste collected by Merton at the kerbside and HRRC combined is 8% higher during this same period, and so again this could indicate a shift in customer behavior. The site's performance was also impacted by a 5% drop in wood waste tonnes, however, the residual reduced by 1%. There has been a 1% increase in the recycling rate at Garth Road when compared with the previous year, suggesting that Improvement measures are starting to have an impact.

- 2.14. Factory Lane has seen a drop in residual tonnes of 9% and has shown a 1% improvement in recycling against the rate achieved last year. Fishers Farm has seen a 12% drop in wood waste tonnes, this is likely to be attributable to the cessation of vans permitted at the site. Whilst the drop in wood waste does have a negative impact on the recycling rate, it is coupled with a 9% reduction in residual waste. The end of year results also show a 1% improvement in performance at Fishers Farm against the previous year. Purley Oaks achieved a recycling rate of 70%, and together with Factory Lane and Fishers Farm, the Croydon sites combined achieved a recycling rate of 67%. Finally, Villiers Road also saw a 6% reduction in residual waste and achieved a year end recycling rate of 72%.
- 2.15. Rigid Plastics and mattresses – There continues to be a UK wide issue in regard to reliable, consistent, financially viable, and environmentally compliant rigid plastic and mattress recycling outlets. There appear to be no suitable reprocessors at this time. During the reporting period the Contractor continued to segregate both of these materials so SLWP can accurately analyse the tonnage data and we can respond quickly to any new markets that may become available in the future. Had the mattresses and rigid plastics been recycled during the period being reported the recycling performance would have improved by 2.7% and the HRRC sites would have achieved a combined recycling rate of 69.09% for the financial year 2019/20.
- 2.16. **Improvement measures** – During the reporting period a number of projects were initiated to try and improve recycling rates. Veolia and SLWP are working together to investigate which recyclable materials residents are not recycling, with the aim of focusing our communications on those recyclable items most commonly disposed of in black bags at the HRRC sites. Veolia are also investigating how we can better segregate and recycle the bulky waste brought to the sites. In addition, there is an on-going work stream to source viable outlets for our mattresses and rigid plastics.
- 2.17. The commercial clamp down project progressed well during the year. The 2019/20 end of year tonnage analysis presents a 6% drop in wood waste against the previous year, which, coupled with the 26% drop in rubble tonnes and 7% drop in plasterboard tonnes, suggests that the systems in place to deter commercial waste from being deposited at the sites are delivering results.
- 2.18. Finally, the soil recycling project has been successful and the material meets the required standard for reuse as a soil.
- 2.19. To note - these projects have been on hold since the 24th March 2020 due to the COVID pandemic. The current focus is on operating the sites in a safe and controlled manner ensuring social distancing measures are in place to protect staff and customers. We will continue to monitor the

situation and the impact of COVID on the operation of the sites with a view to bringing these projects back online as quickly as possible.

3. Contract 3 – Materials Recycling Services, Composting, and additional treatment services (Viridor Waste Management Limited)

3.1. Garden waste is delivered to the Viridor Beddington facility where it is bulked and hauled off-site for treatment in a combination of the following facilities: KPS Isfield and Pease Pottage, Woodhorn Runcton and Tangmere, Tamar Beddingham and Swanley, and Birch Airfield.

3.2. The garden waste is processed in order to produce a BSI PAS100 compost product. There have been some changes to the PAS100 requirements making quality control more stringent, but our material continues to meet quality requirements. Garden waste tonnage data for the reporting period on combined kerbside and HRRC tonnes can be found in Appendix A, in chart 4b.

3.3. Food waste is delivered to either the Beddington facility or the Villiers Road Transfer Station facility. From both sites the food is transferred by Viridor to the Agrivert Trumps Farm Anaerobic Digestion (AD) facility located in Surrey. The Agrivert facility produces a BSI PAS 110 compost product.

3.4. There are no performance issues with the food and garden waste processed through the Contract 3 service.

4. Phase B – Residual Waste treatment Contract (Viridor South London Limited)

4.1. As previously reported to this Committee, Viridor South London have been delivering the Full Services under the Residual Waste Treatment contract since 4th March 2019.

4.2. In the reporting period, 1st April 2019 until the 31st March 2020, the Partnership delivered a little over 202,000 tonnes of residual waste to Beddington, this is a drop in residual waste of just under 3% when the data is compared to the same period last year. Please see Appendix A table 1a for further detail.

4.3. Landfill Diversion: Viridor SL has an annual landfill diversion target, and in 2019/20 this target is 8.66%. In the reporting period, 95% of the residual waste delivered by SLWP partner boroughs was treated via ERF with 5% landfilled. Please see Appendix A table 1b for further diversion data.

4.4. **Emissions** – The emissions from the Beddington ERF are sampled every 10 seconds, 7 days a week, 365 days a year. The results are fed back to the ERF Control Room, so any potential issues are known about immediately and appropriate action can be taken. The results of this monitoring are reported to the Environment Agency (EA - the regulator for the facility) and uploaded by Viridor to a publicly-accessible website

(www.beddingtonterf.info). The EA sets limits (based on 10-minute, 30-minute and daily averages) for different types of emissions. The Beddington ERF has been designed to operate at the very highest international standards and, under normal operating conditions, emissions are well below the limits set by the EA. The ERF has consistently performed within its emissions limits values during the reporting period, with two notable exceptions as detailed in 4.5 and 4.9 below.

4.5. **Carbon Monoxide** – During the period April 2019 to March 2020 there were 19 exceedances of the 30-minute average for carbon monoxide (CO). In each circumstance, the level of carbon monoxide increased above the permitted limit temporarily before quickly (usually within a matter of seconds) returning to permitted operating conditions. Non-recyclable waste, by its nature, changes in composition from bag to bag and occasionally changes in materials can cause disruption to the combustion process for a short period, resulting in elevated levels of CO. Following investigations into each incident, it is considered most likely that the cause was either a propane gas cylinder (commonly used for barbecues), or changes in the composition of waste delivered to the facility that naturally occur in residual waste streams.

4.6. The South London Waste Partnership formally approached the Environment Agency in July 2019 seeking reassurances that the occasional exceedances of CO at the Beddington ERF were not a cause for concern. The EA provided the following response:

The permit ELVs [Emissions Limit Values] are set primarily on the basis of the standard limits specified in Annex VI of the Industrial Emissions Directive, and exceedances of those limits will not necessarily result in an adverse impact on the environment. In the case of CO, an extremely high level of emissions over a prolonged period of time would be needed in order to have a significant impact on the environment, whereas slightly elevated emissions over a short-duration are not likely to result in any measurable environmental impact.

It should also be noted that the variable nature of the residual municipal waste burned by plants can make it extremely difficult for operators to control their CO emissions to permitted limits all of the time, and occasional exceedances can therefore be expected to occur, even when operators apply all available measures to avoid them.

4.7. In January 2020, the Environment Agency made a variation to the Permit for the Beddington ERF in relation to the monitoring and reporting of CO emissions. The monitoring period for CO was increased from every 30 minutes to every 10 minutes. This ensures a greater level of transparency and rigour in the monitoring of the Beddington ERF emissions and brings the Beddington ERF in-line with industry standard monitoring periods for CO. As a result of this more frequent and rigorous monitoring, the EA elevated the permitted limit for CO from 100mg/m³ to 150mg/m³. The daily average permitted level (50mg/m³) did not change. The permit variation states that the Beddington ERF must operate within this 10-

minute average CO limit 95% of the time in any given day (so 95% of the 144 10-minute average recordings taken every day must be below 150mg/m³ in order for the facility to be compliant). The EA has calculated these values to ensure that there is no negative impact to the local community and surrounding environment.

- 4.8. There were no further exceedances of the permitted CO levels at the Beddington ERF for the reporting period.
- 4.9. **Sulphur dioxide** - During the period April 2019 to March 2020 there was one exceedance of a 30-minute average of sulphur dioxide on the 28th February. Following an investigation by Viridor, it was determined that this was likely to be the result of a sudden introduction of high volumes of material such as plasterboard into the ERF. In response to the momentary elevation of sulphur dioxide, the ERF operations team responded quickly, following established flue gas treatment protocols. This ensured that the issue was dealt with promptly and the daily average reading of sulphur dioxide for 28th February remained well below permitted limits.
- 4.10. The SLWP will continue to work closely with Viridor and the EA to ensure the Beddington ERF is operating safely and within the conditions of its Permit.
- 4.11. The facility must operate in accordance with its Environmental Permit which is issued and regulated by the Environment Agency (EA). The site cannot operate without its permit from the EA and if the site is not compliant with its permit, the EA have the power to serve both enforcement and suspension notices.

5. **RECOMMENDATIONS**

- 5.1. It is recommended that the Joint Waste Committee:
- a) Note the contents of this report, and comment on any aspects of the performance of the Partnership's Phase A & B contracts.

6. **IMPACTS AND IMPLICATIONS**

- 6.1. LEGAL -There are no legal considerations arising directly out of the recommendation in this report.
- 6.2. FINANCE - There are no financial considerations arising directly out of the recommendation in this report.

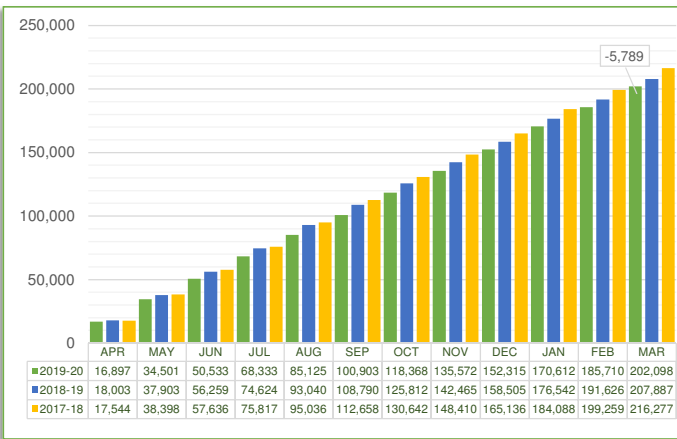
7. **Appendices**

- 7.1. Appendix A provides data on the performance of the Phase A contracts for the reporting period 1st April 2019 to the 31st March 2020.

SECTION 1: CONTRACT 1 - RESIDUAL WASTE DISPOSAL

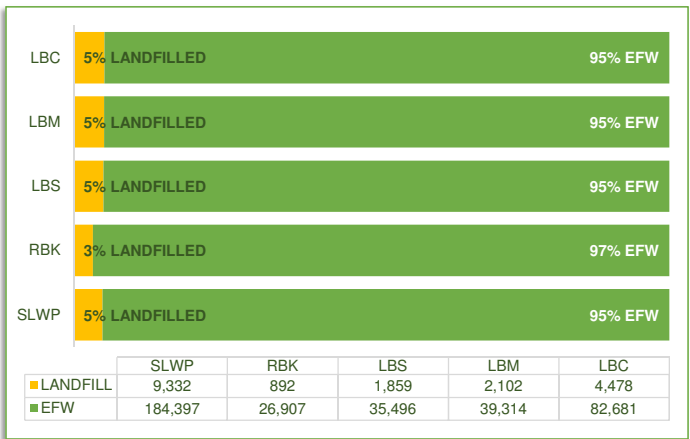
1a - TOTAL RESIDUAL WASTE GROWTH

CULMULATIVE RESIDUAL WASTE - CURRENT YEAR AGAINST 2 PREVIOUS YEARS



1b - DIVERSION FROM LANDFILL

TOTAL TONNES AND % OF WASTE SENT TO ENERGY RECOVERY



SECTION 2: HRRC CUSTOMER SATISFACTION SURVEYS

2a: SURVEY RESPONSES

SURVEY DATES AND NUMBER OF RESPONSES (ALL SITES)

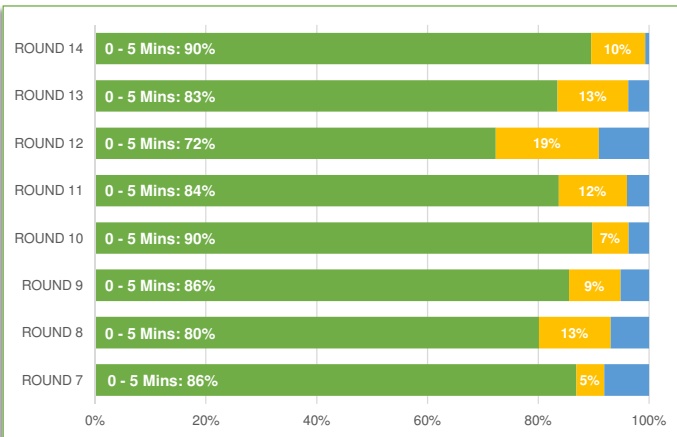
YEAR	ROUND	START DATE	END DATE	TOTAL RESPONSES
YEAR 2	ROUND 7	FEB'18	APR'18	1310
	ROUND 8	MAY'18	JUL'18	995
YEAR 3	ROUND 9	AUG'18	OCT'18	687
	ROUND 10	NOV'18	JAN'19	1020
	ROUND 11	FEB'19	APR'19	893
	ROUND 12	MAY'19	JUL'19	725
YEAR 4	ROUND 13	AUG'19	OCT'19	579
	ROUND 14	NOV'19	JAN'20	339

2b: CUSTOMER FEEDBACK COMMENTS

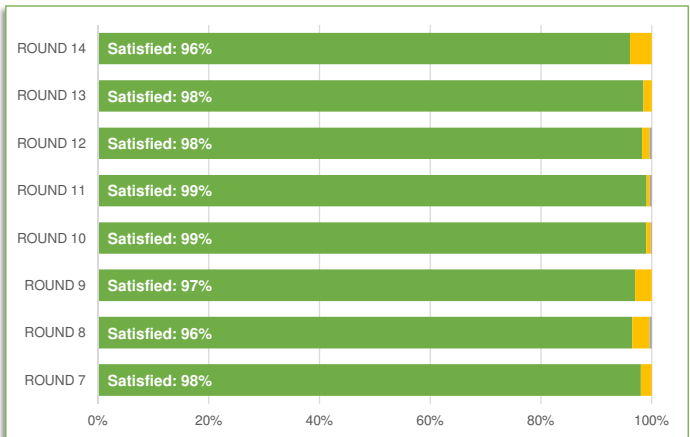
SUMMARY OF MOST COMMON COMMENTS MADE BY RESPONDENTS

RANK	COMMENT	COUNT
1	Staff are helpful	1741
2	Negative feedback on the stairs	658
3	Site is well organised	422
4	Site is convenient and easy to use	397
5	Site has improved	393
6	Parking could be improved	203
7	Site is well run	198
8	More staff needed on site	197

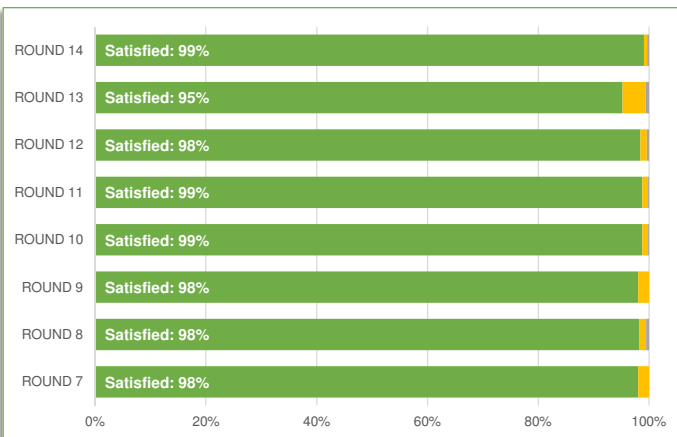
2c: HOW LONG DID YOU QUEUE TO ENTER THE SITE?



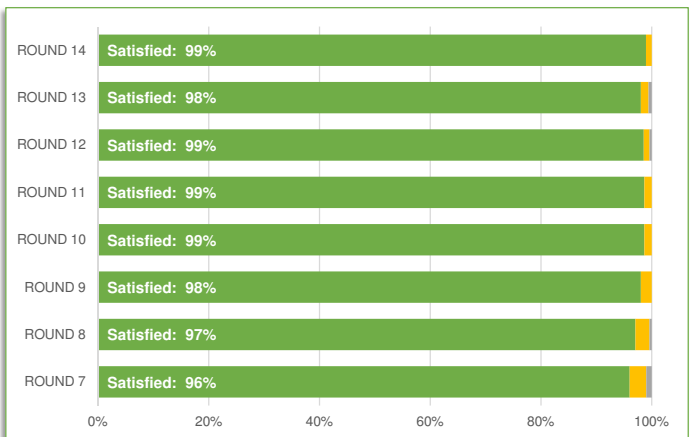
2d: HOW SATISFIED ARE YOU WITH THE CLEANLINESS OF THE SITE?



2e: HOW SATISFIED ARE YOU WITH THE SITE SIGNAGE?



2f: HOW SATISFIED ARE YOU WITH THE HELPFULNESS OF STAFF?



SECTION 3: HRRC RECYCLING PERFORMANCE

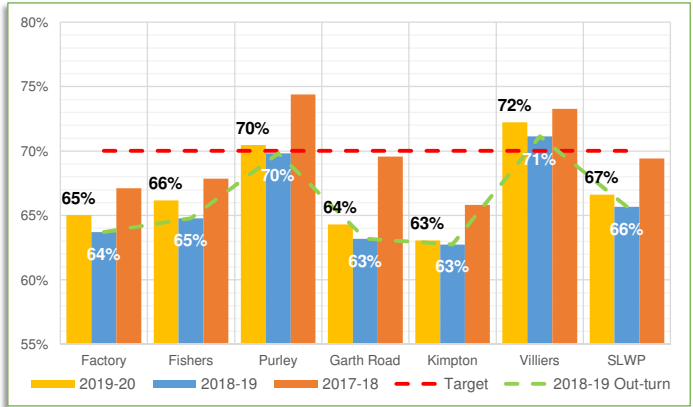
3a: HRRC RECYCLING PERFORMANCE

MONTHLY PERFORMANCE FOR EACH SITE AND SLWP AVERAGE

	FACTORY LANE	FISHERS FARM	PURLEY OAKS	GARTH ROAD	KIMPTON PARK WAY	VILLIERS ROAD	SLWP
APR	63%	64%	71%	64%	61%	71%	65%
MAY	67%	68%	72%	66%	66%	75%	69%
JUN	69%	72%	76%	66%	67%	75%	70%
JUL	68%	70%	74%	67%	66%	74%	69%
AUG	69%	70%	72%	67%	66%	74%	69%
SEP	66%	69%	70%	65%	66%	74%	68%
OCT	65%	64%	70%	64%	63%	71%	66%
NOV	63%	65%	69%	63%	61%	71%	65%
DEC	58%	53%	64%	58%	54%	64%	59%
JAN	60%	61%	65%	58%	59%	69%	62%
FEB	59%	58%	63%	62%	59%	70%	62%
MAR	62%	61%	68%	62%	60%	70%	64%
YTD	65%	66%	70%	64%	63%	72%	66%

3b: YEAR TO DATE RECYCLING PERFORMANCE

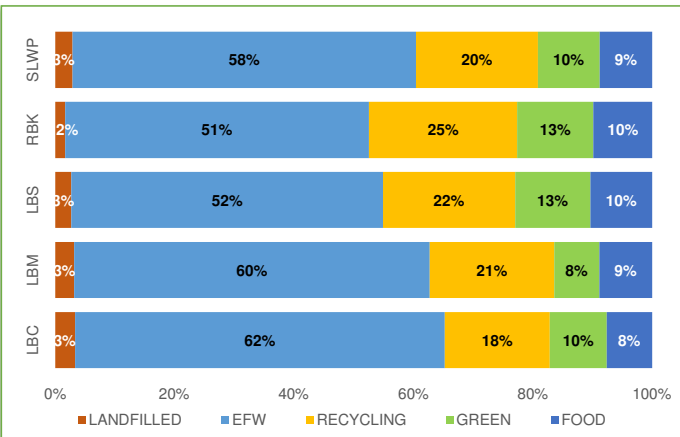
PERFORMANCE COMPARED TO LAST 2 YEARS



SECTION 4: WASTE ARISING

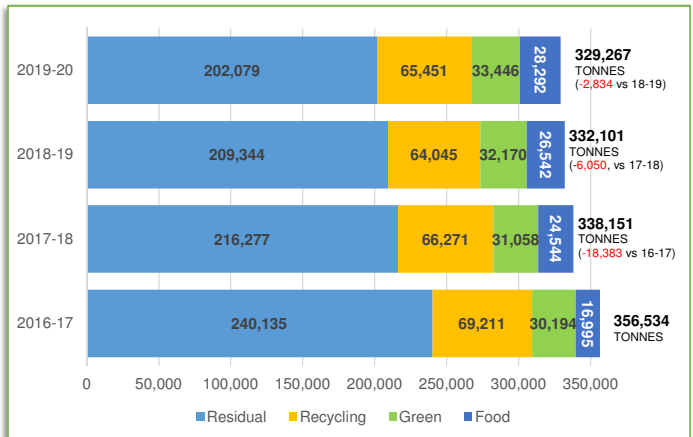
4a: WASTE ARISING BY BOROUGH (PHASE A & B CONTACTS ONLY)

INDIVIDUAL WASTE STREAMS AS % OF TOTAL WASTE (APRIL'19 - MARCH'20)



4b: TOTAL WASTE ARISING - YTD (PHASE A & B CONTACTS ONLY)

QUARTER 1-4 (APRIL'19 - MARCH'20) 2019-20 AGAINST LAST 3 YEARS





Report to: South London Waste Partnership (SLWP)
Joint Waste Committee

Date: Thursday 23 July 2020

Report of: South London Waste Partnership Management Group

Author(s): Michael Mackie, Finance Lead

Chair of the Meeting: Councillor Hilary Gander

<p>Report title:</p> <p style="text-align: center;">SOUTH LONDON WASTE PARTNERSHIP BUDGET OUTTURN 2019/20</p>
<p>Summary This paper provides an outturn position for the 2019/20 financial year.</p>
<p>Recommendations To note the content of this report.</p>
<p>Background Documents and Previous Decisions Previous budget reports.</p>

1. Background

- 1.1 The Partnership sets its budget in December for the forthcoming financial year.
- 1.2 The budget is monitored regularly by Management Group to allow the budgets to be flexed where appropriate in order to respond to any budget pressures.

2. Financial Position 2019/20

- 2.1 The table below refers to the Partnership's provisional outturn position for its Strategic Management activities for the 2019/20 financial year. It relates to expenditure in the following areas; procurement, project management, administration, contract management and communications.

Item	Approved Budget £	Actuals & Commitments £	Forecast Outturn £	Variance £
<i>Internal and External Advisors</i>	96,500	116,970	116,970	20,470
<i>Project & Contract Management</i>	598,700	526,029	526,029	(72,671)
<i>Document and Data Management</i>	24,500	21,637	21,637	(2,863)
<i>Communications</i>	65,500	49,013	49,013	(16,487)
TOTAL	785,200	713,649	713,649	(71,551)
COST PER BOROUGH	196,300	178,412	178,412	(17,888)

- 2.2 The Partnership's budget for core functions forecasts an under spend for the year of £72k for the year. The main variances are as follows:
- 2.3 The Internal and External Advisor budget is forecasting an overspend of £20k for the engagement of external advisors to assess the options available for the renegotiation or re-procurement of the HRRC contract.
- 2.4 Project and Contract Management is forecasting a £73k underspend. The new post of Waste Strategy Officer, agreed during the 2019/20 budget process, has been vacant for the 2019/20 financial year (£61k), with the remaining underspend being attributed to an underspend on the Communications Officer position.
- 2.5 The Communications budget was underspent by £16k which is mainly due to the successful joint bid to Resource London for funding to run an outdoor advertising campaign to support Recycle Week 2019.

3. Recommendations:

- 3.1 To note the content of this report.

4. Impacts and Implications:

Finance

- 4.1 Contained within report.



Report to: South London Waste Partnership (SLWP)
Joint Waste Committee

Date: Thursday 23 July 2020

Report of: South London Waste Partnership Management Group

Author(s): Michael Mackie, Finance Lead

Chair of the Meeting: Councillor Hilary Gander

<p>Report title:</p> <p style="text-align: center;">SOUTH LONDON WASTE PARTNERSHIP BUDGET UPDATE MONTH 3 2020/21</p>
<p>Summary This paper provides an update on the Partnership's budget position for month 3 (June) of the financial year and the projected outturn for the 2020/21 financial year.</p>
<p>Recommendations To note the content of this report.</p>
<p>Background Documents and Previous Decisions Previous budget reports.</p>

1. Background

- 1.1 The Partnership sets its budget in December for the forthcoming financial year.
- 1.2 The budget is monitored regularly by Management Group to allow the budgets to be flexed where appropriate in order to respond to any budget pressures.

2. Financial Position 2020/21

- 2.1 The table below refers to the Partnership's budget position for its Strategic Management activities for month 3 (June) of the 2020/21 financial year. It relates to expenditure in the following areas; procurement, project management, administration, contract management and communications.

Item	Approved Budget £	Actuals & Commitments £	Forecast Outturn £	Variance £
<i>Internal and External Advisors and Accounting</i>	98,400	79,388	188,000	89,600
<i>SLWP Staff Resources and communications management</i>	615,400	134,914	419,800	(195,600)
<i>Document and Data Management</i>	25,000	0	19,000	(6,000)
<i>Communications</i>	26,000	0	26,000	0
<i>Project – HRRC Re-procurement</i>	50,000	0	50,000	0
TOTAL	814,800	214,302	702,800	(112,000)
COST PER BOROUGH	203,700	53,576	175,700	(28,000)

- 2.2 The Partnership's budget for Strategic Management activities at month 3 forecasts an underspend of £112k (£28 per borough) for the year. The major variances are as follows:
- 2.3 Project and Contract Management is forecasting a £196k underspend. This is the result of 3 posts currently being vacant. A review of the SLWP staff resource is currently being carried out, and the forecast has been based on all 3 posts remaining vacant for the rest of the financial year pending the completion of the review. The review is due to conclude in September and the forecast will be updated following the completion of this review.
- 2.4 The Internal and External Advisors budget is forecasting a £90k overspend. This is due to advisors being commissioned to cover some of the activities of the vacant posts and to carry out the review of the staff resource

3. Recommendations:

- 3.1 To note the content of this report.

4. Impacts and Implications:

Finance

- 4.1 Contained within report.



SOUTH LONDON WASTE PARTNERSHIP

Report to: South London Waste Partnership Joint Committee

Date: 23 July 2020

Report of: South London Waste Partnership Management Group

Author(s): Andrea Keys, Interim Strategic Partnership Manager

Chair of the Meeting: Councillor Hilary Gander

Report Title:

**Beddington Waste Transfer Station
Viridor Incident Report
(Fire at the Waste Transfer Station, Beddington Lane, on 11 July 2019)**

Summary

On 11 July 2019 there was a fire at the Viridor Waste Transfer Station (WTS) on Beddington Lane, Sutton. The WTS was used to store waste from the South London Waste Partnership boroughs. The London Fire Brigade, Environment Agency (the regulators for the Beddington site) and Viridor have all conducted investigations into the incident. Viridor has prepared an Incident Report, which is appended to this report for the Committee's attention.

Recommendations

The Committee is asked to note the contents of this report.

1. Background

- 1.1 On 11 July 2019, a fire occurred at the Viridor Waste Transfer Station (WTS) on Beddington Lane, Sutton. The Waste Transfer Station was used to store waste from the South London Waste Partnership boroughs. The WTS is located next to the Beddington landfill site and the Beddington Energy Recovery Facility but is a separately permitted facility.
- 1.2 Viridor has categorised the fire as a 'significant incident' using the following scale:
 - **Major Incident** – This is the classification used if the incident falls under the definition of Dangerous Occurrences contained in the 1995 RIDDOR regulation and 2013 revision.

- **Significant Incident** – Any fire that falls outside the above criteria.
 - **Minor Incident** – Any fire incident that did not require attendance from the emergency services.
- 1.3 Viridor conducted its own investigation into the incident, to look at any lessons that can be learnt to minimize the likelihood of a similar event occurring in the future. The interim findings of that investigation were verbally reported back to this Committee by the SLWP Strategic Partnership Manager at the last meeting on 4 February 2020.
- 1.4 At that time, Viridor were unable to finalise and formally share their Incident Report with the SLWP as they were awaiting input from the London Fire Brigade (LFB) and the Environment Agency (EA). Both agencies had provided interim reports (in the case of the LFB, a 'Confirmation of Attendance Report' and in the case of the EA a 'Compliance Assessment Report'). But both the LFB and EA had confirmed to Viridor that further submissions were to be made.
- 1.5 It was noted that SLWP Strategic Partnership Manager was satisfied that Viridor had cooperated fully with all relevant agencies and that any delays, whilst frustrating, could not be attributed to Viridor.
- 1.6 In March 2020, the LFB provided Viridor with a Fire Investigation Report and the EA provided a further Compliance Assessment Report. Both agencies confirmed that the provision of these reports represented the conclusion of their investigations into the 11 July 2019 incident.

2. London Fire Brigade and Environment Agency Reports

- 2.1 The following reports have been prepared by the London Fire Brigade (LFB) in relation to the incident (Incident number 089397-11072019) at the Beddington Waste Transfer Station on 11 July 2019:
- London Fire Brigade – 'Confirmation of attendance of London Fire Brigade to a fire incident' (Attached at Appendix A)
 - London Fire Brigade – 'Report of attendance of London Fire Brigade to a primary fire incident'
 - London Fire Brigade – 'Fire Investigation Team: Report of fire showing supposed cause and summary information'
- 2.2 Viridor has considered the contents of these reports in compiling their own Incident Report. It should be noted that '*Report of attendance of London Fire Brigade to a primary fire incident*' and the '*Fire Investigation Team: Report of fire showing supposed cause and summary information*' reports are available from the LFB on request to members of the public, but the LFB do charge a fee, and hence neither Viridor nor the SLWP are in a position to share these documents.

- 2.3 The London Fire Brigade has recorded the cause of the fire as 'unknown'. This is not uncommon in waste site fires as the waste is moved in order to fight the fire, making full and detailed examinations difficult. However the LFB did concur, following a review of CCTV footage, with Viridor's conclusion that the fire originated in a pile of waste being moved by a 'front loader' [tractor].
- 2.4 The following reports (attached at Appendix B) have been prepared by the Environment Agency in relation to the incident:
- Environment Agency – 'EPR Compliance Assessment Report' (Report ID: 83441/0341154, dated 30 September 2019)
 - Environment Agency – 'EPR Compliance Assessment Report' (Report ID: 83441/0363108, dated 4 March 2020)
- 2.5 At the time of the fire, part of the Waste Transfer Station was being used for the delivery, inspection and storage of residual bulky waste destined for the neighbouring Energy Recovery Facility. Whilst this residual bulky waste material was permitted to be stored on site, Viridor were required to provide the EA with written notification if the material was to be stored in the Waste Transfer Station tunnels. Viridor report that verbal notification was provided to the EA, but written notification was not.
- 2.6 The Environment Agency considered this to be a breach of the permit and provided (in their Compliance Assessment Report dated 30 September 2019) Viridor with a Compliance Assessment Score of 4. The EA categorised it as non-compliance which could have had a **minor** environmental impact.
- 2.7 Compliance Assessment Scores are issued by the EA when permit conditions have been breached. Assessment Scores range from 0.1 (no environmental impact) to 60 (major impact); so the score awarded to Viridor in relation to this incident is at the lower end of the range.
- 2.8 The Compliance Assessment score over the course of a year has an impact on the annual subsistence charge levied by the Environment Agency – the higher the score, the higher the charge.

3. Viridor Incident Report

- 3.1 The Viridor Incident Report is attached at Appendix C. The Viridor Report:
- Provides further details around the events of the day in question, including a timeline of events
 - Assesses the contributing factors and possible causes of the fire, concluding it was most likely caused by a lithium ion battery damaged during the handling of the waste material
 - Considers lessons that can be learnt from the incident.
- 3.2 The Viridor report provides details of the changes that have been made on site to reduce the risk of a similar incident happening in the future.

These include:

- Removal of all residual or bulky waste from the Waste Transfer Station tunnels at the end of each day
- Occupation of the entire pre-treatment building at the neighbouring Energy Recovery Facility to reduce the reliance on the Waste Transfer Station for the inspection of residual waste
- Instigation of ongoing thermal imaging of residual waste stored in the Waste Transfer Station.

4. RECOMMENDATIONS

- 4.1
- The Committee is asked to note the contents of this report.

APPENDIX A**London Fire Brigade Report****'Confirmation of attendance of London Fire Brigade to a fire incident'**



Confirmation of attendance of London Fire Brigade to a fire incident

Date of report: 06 July 2020

Reference: 089397-11072019/27900

The data presented below have been derived from a computer database. The principal purpose of the database is statistical analysis and to facilitate this analysis, information has been classified into broad categories.

Incident number:	089397-11072019
Fire station ground where fire occurred:	Wallington
Time and date of call to the Brigade:	10:25 hrs 11 July 2019
Origin of call:	Person (mobile)
Recorded time and date of arrival of Brigade:	10:32 hrs 11 July 2019
Recorded time and date incident under control:	19:24 hrs 11 July 2019
Time and date incident closed:	05:35 hrs 12 July 2019

(The address below may not be shown in full as it could result in the disclosure of personal data under the Data Protection Act)


Address qualifier:	Correct incident location
Building name/Number:	105
Flat/Unit name/Number:	
Street:	BEDDINGTON LANE
Locality:	
Town:	BEDDINGTON
County:	
Post Code:	CR0 4TD
Further description of location (where required):	
Type of property where fire started:	Recycling plant
Supposed motive for the fire:	Not known

(Note that the motive for a fire can rarely be determined with certainty and is not the subject of extensive enquiry by the Brigade at fires of this type. The most likely cause that can be ascertained while at the scene of the fire is recorded for Brigade and government statistical purposes only)

This document produced by Incident Reports Section (telephone 020 8555 1200 ext 30422)

Copyright © London Fire Commissioner
All rights reserved. The London Fire Commissioner is the fire and rescue authority for London

**APPENDIX B
ENVIRONMENT AGENCY COMPLIANCE ASSESSMENT REPORTS
83441/0341154 AND 83441/0363108**

 Environment Agency	EPR Compliance Assessment Report		Report ID: 83441/0341154			
This form will report compliance with your permit as determined by an Environment Agency officer						
Site	Viridor Recycling Centre		Permit Ref	EPR/FB3804XU		
Operator/ Permit holder	Viridor Waste Management Limited					
Date	11/07/2019		Time in	16:25	Out	19:40
What parts of the permit were assessed	All					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Laura Brown, Recycling Manager					
Officer's name	Rosemary Ricketts		Date issued	30/09/2019		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our [Compliance Classification Scheme](#) (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your [local office](#).

Permit Conditions and Compliance Summary

Condition(s) breached

Permit Conditions and Compliance Summary	Condition(s) breached
a) Permitted activities	1. Specified by permit
	C3
	2.1
b) Infrastructure	1. Engineering for prevention & control of pollution
	N
	2. Closure & decommissioning
	N
	3. Site drainage engineering (clean & foul)
	N
	4. Containment of stored materials
	N
	5. Plant and equipment
	N
c) General management	1. Staff competency/ training
	N
	2. Management system & operating procedures
	N
	3. Materials acceptance
	N
	4. Storage handling, labelling, segregation
	N
d) Incident management	1. Site security
	N
	2. Accident, emergency & incident planning
	N
e) Emissions	1. Air
	N
	2. Land & Groundwater
	N
	3. Surface water
	N
	4. Sewer
	N
	5. Waste
	N
f) Amenity	1. Odour
	N
	2. Noise
	N
	3. Dust/fibres/particulates & litter
	N
	4. Pests, birds & scavengers
	N
	5. Deposits on road
	N
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment
	N
	2. Records of activity, site diary, journal & events
	N
	3. Maintenance records
	N
	4. Reporting & notification
	A
h) Resource efficiency	1. Efficient use of raw materials
	NA
	2. Energy
	NA

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
------------------------------------	---	---	---

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

The Environment Agency was notified at 10.51am by the London Fire Brigade (LFB) of a fire incident at Beddington Farmlands. Installations team officers were initially confused as to the location of the fire i.e. was it occurring within the Landfill, the Energy Recovery Facility (ERF) or the Recycling Centre? Calls received from the operator clarified it was within the Recycling Centre permit boundary. As a result of both written and verbal notifications of the fire, I attended the site at 16.24hrs to gather further information and observe the after math of the incident.

The weather was good i.e. Clear, dry and breezy but smoky within the facility (drawing BTN68). The wind direction was westerly. The burnt residues were observed in front of the biofilter tunnels. The sides of the incinerator were completely unscathed. The Fire Brigade was still on site damping down the burnt wastes and white smoke visible.

I met with Viridor representatives: Robin Edwards Landfill Manager, Laura Brown Recycling Manager, Paul Sison HSSA Advisor Logistics, London & South East and Brett McGuin ERF Manager.

ERF Manager explained that the waste deposited in the biofilter tunnels is checked for non-compliant wastes, which are removed and the compliant wastes are taken to the incinerator. Any bulky waste such as mattresses etc. are taken to the shredder/bunker, shredded and then taken to the incinerator. ERF manager estimated that 50-100 tonnes of waste was present. LFB used 3 hydrants and an ERF fire tank. The fire water did not enter the River Wandle but directed into an underground tank which was then emptied into tankers and taken to a permitted treatment facility in North London.

During and after the incident, acceptance of all non-SLWP commercial wastes was cancelled. Paul Sison oversaw the fire operation. LFB still on site during and after my visit.

Initial contingency plan was decided by Terry Murphy, Director to direct the waste to the landfill transfer pad. Viridor's priority was to ensure continual supply of waste for the ERF as the waste transfer building was inaccessible because the route to the transfer building would have crossed the fire. South London Waste Partnership's (SLWP) waste was accepted and deposited onto the transfer pad within the landfill site. All waste on the transfer pad was transferred into a rolonof to the ERF. The transfer pad was cleared by the end of the same working day. The Environment Agency was not consulted about the contingency plan.

I was informed during the meeting that Viridor Waste Management intend to consolidate the waste transfer station EAWML 104442 and ERF permit EPR/TP3836CT. The biofilter tunnels are still under the recycling permit but the intention is that they'll will be transferred to the ERF permit under a variation to the consolidated permit i.e. a two-stage process.

Permit Breach

We believe that the operation to assess the ERF waste stream in this location is a breach of permit condition 2.1. **CCS score 3**

(a)-permitted activities – specified by permit

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

Schedule 1 - Operations

Table S1.1 activities

Activity reference	Description of activities for waste operations	Limits of activities
A1: Skip Waste Recycling Facility	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>R5: Recycling/reclamation of other inorganic compounds</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents</p>	<p>Treatment consisting only of physical sorting or separation of waste into different components for recycling or reclamation</p> <p>The storage of waste prior to treatment shall take place on an impermeable surface with sealed drainage system.</p> <p>WEEE shall be stored in accordance with the WEEE directive.</p> <p>There shall be no treatment of WEEE.</p> <p>Waste types as per table S2.1.</p>
A2: Household, Commercial and Industrial Waste Transfer Facility	<p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>R5: Recycling/reclamation of other inorganic compounds</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>D15: Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on site where it is produced).</p> <p>D13: Blending or mixing prior to submission of any of the operations number D01 to D12.</p> <p>D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D01 to D12</p>	<p>Treatment consisting only of physical sorting or separation of waste into different components for disposal (no more than 50 tonnes per day), or recovery.</p> <p>No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.</p> <p>WEEE shall be stored in accordance with the WEEE directive.</p> <p>There shall be no treatment of WEEE.</p> <p>Waste types as per table S2.2.</p>
A3: Food Waste Storage Facility	<p>D15: Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on site where it is produced).</p>	<p>Waste shall be stored in an enclosed vessel or in a building as per condition 1.1.1 and the agreed odour management plan.</p> <p>Waste shall be removed from the site within 48 hours or within 72 hours on bank holidays.</p> <p>There shall be no treatment of waste.</p> <p>Waste types as per table S2.3.</p>

A4:
Green Waste
Composting
Facility

R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)

R3: Recycling/reclamation of organic substances which are not used as solvents

Treatment operations shall be limited to shredding, screening and in-vessel composting.

All treatment operations shall be carried out on an impermeable surface.

The storage of waste prior to treatment shall take place on an impermeable surface.

No green waste shall be stored on site prior to composting for longer than 72 hours.

The maximum quantity of waste being

- stored prior to composting;
- composted and;
- stored for maturation

shall not exceed a total of 5,600 tonnes at any one time.

Waste types as per table S2.4.

We will continue to fully assess the incident and any relevant permit compliance.

Action

What action(s) does Viridor Waste Management intend to regularise the activities currently being carried out in the area defined in permit number EPR/FB3804XU dated 22/01/2018 (previously EPR/VP3190EW/V004 dated 13 December 2013)?

Photograph 1 Fire engines on site



Photograph 2 Fire ravaged waste



Photograph 3 Burnt out composting tunnels in the background



Photograph 4 Remaining converted composting tunnels unaffected




Photograph 5 Burnt waste, incinerator walls unaffected



Photograph 6 Landfill transfer pad used for SLWP waste but was cleared by end of the day



 Environment Agency	EPR Compliance Assessment Report	Report ID: 83441/0341154	
This form will report compliance with your permit as determined by an Environment Agency officer			
Site	Viridor Recycling Centre	Permit	83441
Operator/ Permit	Viridor Waste Management Limited	Date	11/07/2019

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.			
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.			
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.			
We will now consider what enforcement action is appropriate and notify you, referencing this form.			X

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			
A1	C3	Please see action required.	22/11/2019

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.


Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@environment-agency.gov.uk. If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#), phone their helpline on 0345 015 4033.

 Environment Agency	EPR Compliance Assessment Report		Report ID: 83441/0363108			
This form will report compliance with your permit as determined by an Environment Agency officer						
Site	Viridor Recycling Centre		Permit Ref	FB3804XU		
Operator/ Permit holder	Viridor Waste Management Limited					
Date	15/10/2019		Time in	09:15	Out	11:00
What parts of the permit were assessed	Whole					
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X	Water Discharge
Recipient's name/position	Laura Brown, Recycling Manager					
Officer's name	Rosemary Ricketts		Date issued	04/03/2020		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our [Compliance Classification Scheme](#) (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your [local office](#).

Permit Conditions and Compliance Summary

Condition(s) breached

Permit Conditions and Compliance Summary	Condition(s) breached
a) Permitted activities	
1. Specified by permit	A
b) Infrastructure	
1. Engineering for prevention & control of pollution	N
2. Closure & decommissioning	N
3. Site drainage engineering (clean & foul)	N
4. Containment of stored materials	N
5. Plant and equipment	A
c) General management	
1. Staff competency/ training	N
2. Management system & operating procedures	N
3. Materials acceptance	N
4. Storage handling, labelling, segregation	N
d) Incident management	
1. Site security	N
2. Accident, emergency & incident planning	N
e) Emissions	
1. Air	N
2. Land & Groundwater	N
3. Surface water	N
4. Sewer	N
5. Waste	N
f) Amenity	
1. Odour	A
2. Noise	A
3. Dust/fibres/particulates & litter	A
4. Pests, birds & scavengers	A
5. Deposits on road	A
g) Monitoring and records, maintenance and reporting	
1. Monitoring of emissions & environment	N
2. Records of activity, site diary, journal & events	N
3. Maintenance records	N
4. Reporting & notification	N
h) Resource efficiency	
1. Efficient use of raw materials	N
2. Energy	N

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
------------------------------------	---	---	---

If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.


Site meeting with Recycling Manager and Mike Blease, HSSA.

Discussion

- Viridor management reviewing incident on CCTV. It appears that the fire started approximately a metre into the tunnel.
- Initial report from LFB did not identify the cause of the fire. Investigation still ongoing by both Viridor and LFB.
- Viridor intends to keep the tunnel concrete infrastructure but remove the roof.
- Site's ODMP being updated to reflect the current operations.
- Permitted operations observed, no breaches.

Actions

- ODMP should be submitted to the Environment Agency two months from receipt of CAR form.
- Environment Agency request copies of Viridor's CCTV and final investigation report of the fire incident 11.7.2019.

 Environment Agency	EPR Compliance Assessment Report	Report ID: 83441/0363108	
This form will report compliance with your permit as determined by an Environment Agency officer			
Site	Viridor Recycling Centre	Permit	83441
Operator/ Permit	Viridor Waste Management Limited	Date	15/10/2019

Section 3- Enforcement Response

Only one of the boxes below should be ticked

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required / Advised	Due Date
See Section 1 above			

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.
- A civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response for this/these offence(s).

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The Environment Agency will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within 28 days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@environment-agency.gov.uk. If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#), phone their helpline on 0345 015 4033.

**APPENDIX C
VIRIDOR INCIDENT REPORT: BEDDINGTON WASTE TRANSFER
STATION FIRE 11 JULY 2019**



INCIDENT REPORT

Title: Beddington Waste Transfer Station Fire 11th July 2019 – Summary Report

Document Type: Incident Review

Business: Viridor Waste Management

Function: Logistics

Contents

Scope of summary report	1
Executive summary.....	1
Outcome	2
The Beddington Waste Transfer Station.....	2
Timeline of events	4
Contributing factors and causation review.....	5
Onsite procedures review.....	6
Summary of findings and considerations from the LFB report.....	9
Recommendations.....	10

Scope of summary report

This report is a factual timeline of events, and reviews the evidence available, at the time of writing, to establish the cause of the fire at the Beddington Waste Transfer Station (WTS).

As with any incident we have looked at any lessons that can be learnt to minimise the likelihood of a similar event occurring in the future. We have also identified the positive actions taken whilst the fire was ongoing.

The recommendations made are following observations and subsequent site visits from the London Fire Brigade (LFB), the Environment Agency (EA) as well as onsite observations from Viridor's Operations team. We will share these with the wider Viridor business and South London Waste Partnership (SLWP).

Executive summary

At approximately 10.17 AM on the 11th July 2019, faint smoke was observed coming from a recent delivery of bulky waste deposited at the Waste Transfer Station (WTS) located within Viridor's Beddington Lane facility. The bulky waste that had been recently deposited into the WTS for inspection. Shortly thereafter a visible fire was present within the waste mass.



INCIDENT REPORT

Viridor's mobile plant operators initially attempted to extinguish the fire using a fire extinguisher before activating the site's emergency procedures, evacuating the WTS and calling the London Fire Brigade (LFB). Viridor's Energy Recovery Facility (ERF) Operations team prepared for the arrival of the LFB by enabling access to integrated fire hydrants on the site.

Before the LFB arrived at the site, the fire had spread to most of the waste material in one tunnel and the roofing of the WTS.

The LFB arrived c. 15 minutes after being called and managed the fire until it was extinguished on the evening of the 11th July.

Viridor's communications team worked with the SLWP to engage with the media and local community. The area was surveyed to make sure no firewater would exit the site. It was contained within an underground tank with the outlet pumps isolated to contain water on site, in accordance with Viridor site procedures. The Environment Agency officers responsible for the site were notified of the event.

Following extinction of the fire, the LFB departed site. A period of fire watch was then undertaken in accordance with the LFB protocol. There were no injured persons.

Viridor would like to take this opportunity to thank the LFB for its assistance during the incident.

Outcome

The industry standard method adopted by Viridor to classify the appropriate category of the fire event is:

A) Major Incident:

This is the classification used if the incident falls under the definition of Dangerous Occurrences contained in the 1995 RIDDOR regulations and 2013 revision.

B) Significant Incident:

Any fire incident that falls outside of the above criteria.

C) Minor Incident:

Any fire incident that did not require attendance from the emergency services.

This incident was categorised as a **Significant Incident** in line with the above criteria.

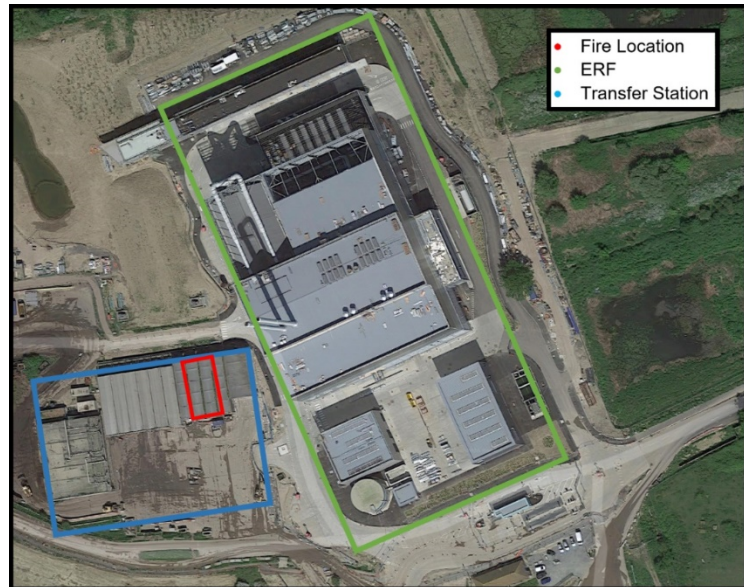
The Beddington Waste Transfer Station

The Beddington WTS operates in accordance with the relevant environmental legislation and in accordance with planning conditions. It is a separately permitted facility co-located on the Beddington site alongside the Beddington ERF. In accordance with its permit, the Beddington site accepts the waste collected from households by SLWP together with commercial waste from south London. The WTS is permitted to receive mixed green, food and co-mingled recyclables for bulking and transfer to specialist recycling facilities along with other wastes.

INCIDENT REPORT

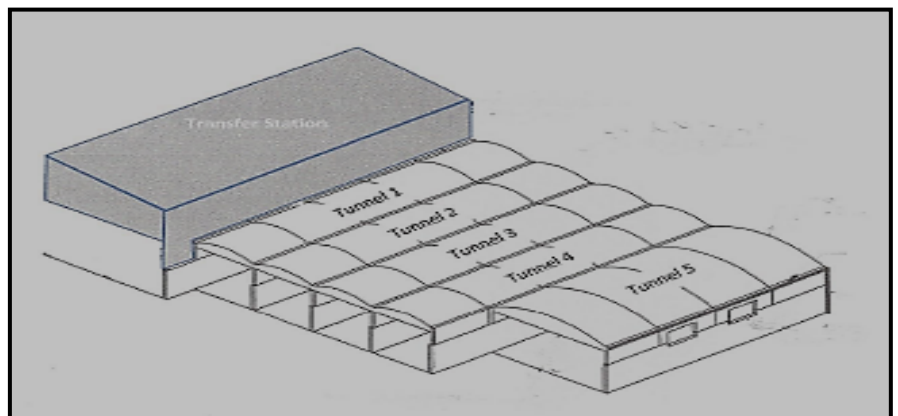
At the time of the fire, and in accordance with its permit, Viridor was also utilising the WTS for residual bulky waste. This material was delivered, then inspected to identify any non-conforming material that could cause harm to the ERF, this includes for example propane gas bottles, or solid bulky items.

The visual inspection of this waste took place within the tunnels of the WTS where waste deliveries would be ejected from their delivery vehicle, and any non-conforming material would be isolated and removed to an appropriate, licensed facility for disposal. Acceptable material would be stored in the facility before being transferred to the ERF for shredding and then processing. The Beddington WTS is indicated in the image (above, right).



The WTS contains five concrete tunnels, each with a metal overhead framework covered in a tarpaulin/fabric material.

At the time of the fire tunnels 2 & 3 were being used to complete residual bulky waste inspections of incoming material for the ERF and to store larger 'bulky waste' such as sofas and mattresses which require shredding before being processed in the ERF.



The WTS holds a valid Fire Risk Assessment, which is reviewed annually, noting management processes and mitigation measures for managing risks of fire at the site. There was no requirement under the permit for the WTS to have fire suppression systems.



INCIDENT REPORT

Timeline of events

Timing	Description of activity
09:58 – 10:03	4-axle vehicle unloads primarily mattresses in the WTS loading bay.
10:07 – 10:10	A cage vehicle unloads a mixture of bulky & black bag waste into the WTS loading bay.
10:14 – 10:16	Viridor's loading shovel pushes waste tipped onto the floor (including mattresses) into the tunnels ready to receive next cage vehicle.
10:16	Cage vehicle reverses into position.
10:17:10	First sign of wispy smoke rising from within the mattress pile.
10:17:40	Thicker smoke begins to rise, becoming clearly visible.
10:17:55	First appearance of flames.
10:18	Initial attempt to tackle the fire with an extinguisher.
10:18:15	Flames reach 1-2m above the waste pile and reach the fabric roof of the waste tunnels.
10:18:30	Fire alert over site radio and mobile phone call to LFB.
10:20	Thick smoke emitting from both tunnels – roof now on fire.
10:21	Viridor Operations Manager arrived in area and assumes role of Incident Co-ordinator.
10:25	Flames now present in b tunnels 2 and 3. ERF staff prepare fire hydrant point ready for emergency services connection on arrival.
10:28	First LFB Fire Tender arrives on scene.
10:29	Second Fire Tender arrives on scene.
10:30	First application of water on fire (from ERF Hydrant).
10:36	Third Fire Tender arrives at scene.
10:37	Fourth Fire Tender arrives at scene.
10:42	Site inspection to confirm no firewater was exiting via surface water.
10:50	LFB Incident Commander (IC) attends scene.
11:30	Raw water consumers' supply reduced to increase supply to fire tank.
11:39	Community update provided
12:06	Vehicles authorised to enter site restricted for entry into landfill operations only. All lorries entering site required Incident controller/Safety Controller approval (direction/traffic management controlled).
12:10	Fire investigator arrives on site (LFB).
13:30	First tanker arrives to remove the firewater.
13:50	Second tanker arrives to remove the firewater from Tunnel 3.
14:20	Commence removing burning waste from Tunnel 2.
14:50	LFB investigator exits site.
14:55	Fire appliances attend to 'swap shift' – fire is assessed to be under control. Fire service hand over to incoming shift and begin to demobilise.
15:40	LFB IC exits site.
17:30	Further community update provided
17:36	Final loading shovel bucket of burning waste removed from the tunnels.
18:00	Team brief at location – brigade reduce to one hydrant and one vehicle to douse waste pile.
19:30	VWM IC & S/E Controller debrief with remaining fire personnel. LFB happy fire is extinguished and begin demobilisation. Returned to site for check-up at 21:00. Site team continue fire watch and complete thermal imaging



INCIDENT REPORT

	checks.
19:45	LFB fully demobilised from site.
12 th July – 07.57	Further community update:

Contributing factors and causation review

At the time of the WTS fire, a part of the facility was being used for the delivery, inspection and storage of residual and bulky waste destined for the ERF. This material was delivered by the SLWP into the storage tunnels and Viridor's Operations team inspected the waste for non-conforming items that may have resulted in damage to the Beddington ERF.

Upon completion of this inspection, the conforming material would be transferred to the pre-treatment facility within the ERF site for shredding and then be sent to the waste bunker at the ERF. Any non-conforming material would be isolated and transferred to an appropriate licensed facility for disposal.

Due to there being limited space available in July 2019 greater volumes of material was being stored in the WTS for longer periods. This was exacerbated by a breakdown of the ERF shredding equipment and consequently, an increased volume of residual bulky waste was being stored in the WTS than there would otherwise have been.

In the future, contingency arrangements will be prepared to ensure that if, for any reason, the ERF is unable to shred bulky material this is transferred to an appropriate, licensed facility for disposal.

During the course of this investigation, a number of potential fire source options were considered; for the purposes of clarity, these potential sources have been listed below. In Viridor's experience of operating a UK-wide network of waste management facilities, these are the most common causes of waste facility fires. Following a review of the CCTV footage for the WTS during the incident, the characteristics of the fire initiation has led Viridor to consider the following items are most likely to have caused the fire.

Hot Discarded Barbecue Coals – incoming waste composition

Considered to be a potential source of ignition due to the warm weather. Barbecue coal generated fires tend to spread slowly and often result in slow burn fires. The handling of the waste material could have introduced a sudden influx of oxygen to ignite the fire starting from buried coals within the waste mass.

Lithium Ion Batteries – incoming waste composition

This is considered to be a high potential ignition source, usually the lithium ion batteries have been struck or suffered damage to the casing and frequently produce an initial very intense flame which shows on CCTV images as a bright white flash. This can occur while waste is managed or handled by mobile machinery. The CCTV recording did not indicate the flame burst often associated with lithium ion ignition sources however if buried under the bulky material, this reaction may not be visible.



INCIDENT REPORT

The trade body representing the UK's resource and waste management industry, reports that of the 510 fires reported by Environmental Services Association members across the UK in 2017-18, a quarter (25%) were attributed to lithium ion batteries, up from 20% in the previous year. Lithium ion batteries are the most frequently verified source of ignition in waste fires.

Friction (Sparks) – Handling of waste material

Direct contact between the metal wear protection plate on the leading edge of the loading shovel multi-purpose bucket and the concrete floor surface, most commonly used in waste facilities, can produce friction sparks during movement. It was not possible to eliminate this source completely because the camera angles for the CCTV recording did not capture that part of the machine. However, the likelihood of this being the source is exceptionally low because usually a fire generated in this way would be evident at the base of the waste pile not the top as seen on the CCTV.

Due to the way in which waste fires are managed, where the waste is turned and excavated to access the active fire, it has not been possible to identify the exact cause of the fire at the Beddington TLS.

Other potential sources of ignition in waste facility fires:

Self-Combustion (Decomposition) – It is considered this can be eliminated as a potential heat source because reference to CCTV screenshots confirm that the fire started in a fresh pile of bulky waste which had only just been pushed up into the bay with no evidence of decomposition.

Pyrotechnics (TEPs) - The presence of time expired pyrotechnics e.g. a flare was considered low on the list of possible causes however due to the way in which the waste was managed during the fire, it is impossible to investigate because of the inability to examine the remnants of the fire damaged waste.

Arson – Accelerants - This could not be completely eliminated as a potential source of ignition however there was absolutely no evidence found of any third-party involvement. A possible risk of this might be carelessly discarded smouldering cigarette butts. Viridor operates a stringent no smoking policy across its sites. Viridor will continue to remind colleagues of the policy for smoking on its sites.

Chemical Incompatibility - Chemical incompatibility related fires are often instantaneous on contact between two or more reactive agents. Examination of CCTV recorded footage shows no indication of this and can therefore be reasonably eliminated as the potential ignition source.

Electrical Fire – This cause can be eliminated due to the seat of the fire originating in tunnel 2 material pile where there are no electrical circuits located.

Onsite procedures review

The Beddington WTS held a valid Fire Risk Assessment and operational management procedures for activities under its environmental permit.



INCIDENT REPORT

Viridor's logistics business unit was responsible for the receipt, handling and onward transfer of co-mingled recyclables, mixed organic food waste and conducted regular thermal imaging inspections along with visual inspections on the material stored at the WTS. The receipt, inspection and movement of residual and bulky waste at the WTS was managed by the Viridor ERF Operations team, due to the short term nature of the material storage, only visual inspections were conducted.

As part of the review of this incident, going forward it has been decided that the residual and bulky waste stockpiles will be removed from the WTS at the end of each day to minimise the build-up of material. This material should be moved to the pre-treatment building within the ERF complex or transferred offsite to an appropriate, licensed facility if the shredder is unavailable. If, for any reason, material must be left in the WTS at the end of a day, this material will be thermally inspected throughout the storage period.

Upon identification of the fire, the WTS emergency procedures were initiated with the Viridor Operations team evacuating the WTS and mustering in the defined muster point. The evacuation was completed quickly and in an orderly fashion. The ERF team and contractors of the construction project followed their respective procedures.

The LFB were called and when they arrived, the Fire Commander became the Incident Controller. He liaised directly with the appointed Incident Controller from site (ERF Operations Manager). Viridor provided man-power and equipment to provide support under the instruction of LFB. This was noted in the LFB correspondence as helpful and supportive to the management of the incident.

Upon detection of the incident, Viridor's Contracts team was in liaison with Veolia (the SLWP's waste collection partner responsible for delivering waste to the site) and third parties responsible for delivering other waste material to the site. It was noted that at the time of the incident the Viridor Contracts team were attending meetings off site and consequently there was a short delay in providing formally notification to the SLWP. A review of communications protocols will be completed to ensure that the SLWP are informed of activity as soon as it happens.

All deliveries to the site were halted for a period of c. 30 minutes whilst the LFB established control of the fire. It should be noted that Veolia's response to the fire ensured that vehicles were re-directed back to their depots, with only a handful queueing on Beddington Lane and Coomber Way. Veolia's collections crews showed empathy and understanding of the situation and were supportive of their Viridor counterparts. Viridor would like to thank the Veolia collection crews and management for their support which resulted in minimal impact to the local highway network and should be recognised as best-practice.

Viridor contacted the Environment Agency officer for the landfill site and secured an alternative location on the Beddington site to receive incoming waste deliveries to ensure that the SLWP waste collection service was unaffected. Waste processing activities at the ERF remained unaffected during this time. It was subsequently noted during an Environment Agency inspection and investigation that Viridor had given verbal notification of its intention to receive, inspect and store bulky waste in the WTS two weeks prior to the activity commencing.



INCIDENT REPORT

Viridor's appointed Media Officer notified the ward member (and also member of the community liaison group) within 15 minutes of the incident along with issuing a short email update to members of the community liaison group within 75 minutes of the incident. Two further community phone calls were answered in the first hour of the incident and the Environment Agency officer for the WTS called the site and spoke to the Media Officer.

Viridor's Media Officer issued further email updates to the community liaison group on the evening of 11th July and following the fire being fully extinguished on the 12th July. It is recognised that in the immediate minutes after the fire was identified, staff of the landfill site evacuated the office to meet at the emergency muster point. The phonenumber was ringing with customers, community members and the Environment Agency officer seeking updates on the fire. Viridor will investigate a system of diverting phone calls to a central switchboard during emergency situations to ensure business continuity and staff welfare.

A number of media outlets contacted Viridor for a statement during the incident. Viridor's Media Officer worked with the Pennon Press Office to develop a statement for proactive issue to local and trade media outlets. This was completed within 30 minutes of the incident occurring. Initially Viridor was unable to contact the SLWP Media Officer and liaised directly with the London Borough of Sutton's Lead Media Officer. All media outlets that contacted Viridor received the statement within 60 minutes of request and received updates to the statements to ensure online communities were kept updated of the issue.

Following feedback from members of the community liaison group, there was positive confirmation that the email to stakeholders in the early moments of the event was helpful to establish the situation, along with subsequent updates. However, there has been feedback focusing on the subjectivity of the scale of the fire, along with commentary that for any future events more detail reassuring members of the community around the potential health impacts of the fire would be appreciated, for example 'residents near to the site should keep windows closed.'

Viridor staff were made available to ensure site movements were controlled ensuring waste vehicles, deliveries and members of the public were unable to access the site whilst prioritising access and egress for the LFB.

Viridor's operations team worked in partnership with the LFB to ensure the fire could be managed responsibly with infrastructure being moved to allow LFB better access to fight the fire. Viridor's operations team worked to use mobile plant on the site to dig out smouldering waste material and then deployed the onsite tractor & bowser to assist LFB to douse the smouldering material removed from the tunnels.

The Environment Agency officer for the WTS attended the site in the late afternoon and evening and was met by the ERF Incident Controller and WTS Site Manager.

The water used to tackle the fire was from the ERF firewater storage tank. This tank holds approximately 1.3 million litres which is sufficient to use all of the seven available site hydrants simultaneously at full flow for two hours. Of the available hydrants, three were utilised by the LFB.



INCIDENT REPORT

Viridor managed water egress into sealed receptors and storage tanks to ensure fugitive firewater did not leave site. Circa 258,000 litres of firewater were removed from the site via tankers and disposed of at a suitable permitted wastewater treatment facility.

The wind direction was primarily from the West and West South West, sending a visible smoke plume over the top of the ERF and over the industrial units located to the North East of Beddington Lane. As confirmed above for any future events, more detail will be issued to reassure members of the community around any potential health impacts of a fire in community updates and in conjunction with advice from the LFB.

Summary of findings and considerations from the LFB report

Upon conclusion of the LFB investigation, its report was issued to Viridor on 9th October 2019. Within the Primary Fire Report issued by the LFB, it notes that there is a pending 'fire investigation team findings' paper due to follow this note. On the 3rd December 2019, Viridor requested further information on the status of this and will update the SLWP upon receipt of further information. Viridor has been instructed to contact the LFB in 21 days to receive an update in accordance with the LFB's procedures. The LFB investigation summary report was received on 2nd March 2020 and confirmed that it was not possible to identify the source of ignition.

Viridor was obliged to notify its environmental regulator, the Environment Agency, ahead of any change of use to the WTS. Viridor verbally notified the Environment Agency in advance of initiating residual bulky waste reception during a previous EA site visit.

The LFB report notes that the cause of the fire was contained within the delivery of residual waste to the WTS. Building upon Viridor's industry knowledge of managing fires on waste sites, alongside the CCTV footage available from the Beddington WTS fire, it is concluded that the source of the fire is likely to be a lithium ion battery damaged during the handling of the waste material. Viridor is undertaking some work with the SLWP to develop a series of communications for residents to raise awareness of waste types that should not be sent for disposal in the residual waste as they can be recycled instead.

Due to the speed of the fire development and growth, it was not appropriate for the Viridor Operations team to attempt to manage and fight the fire onsite. The Viridor Operations team acted quickly and effectively to secure the access points at the site entrance and WTS entrance for the LFB and enabled quick access to the integrated fire hydrant network within the site. Combined with the early communication to waste delivery partners, this ensured the LFB could access the site unobstructed.

Viridor's operations team worked in partnership with the LFB to support them and enable quick and easy access to the affected areas of the site. Our ops team also promptly organised wastewater tankers from Viridor's network to remove the firewater from the site.

All Viridor staff and contractors had sufficient welfare facilities upwind of the fire. Bottled water was provided to LFB in the working area.



INCIDENT REPORT

Media communication was managed via the designated Media Officer. All internal updates included the Media Officer, so up to date information could be fed to all key stakeholders efficiently. Future communications to local residents should include a reference to the safety of members of the community, including notifications to keep windows closed if appropriate.

The LFB confirmed by e-mail that they had been very impressed with the professional support they had received from Viridor management and operations team throughout the incident.

Recommendations

The Beddington WTS fire was a significant event that was managed safely and responsibly through a partnership of the London Fire Brigade and Viridor Operations team with further assistance from the South London Waste Partnership and Veolia. There are a number of key learning points from this event. These are detailed below; further discussion will be required to progress these points:

Recommendation	Progress
Contingency planning (linked into the wider SLWP resilience planning), for the diversion of waste should any component part of the Beddington facility loses the capability to accept waste will be reviewed annually or after any incident at the site.	Complete – July 2019
Removal of all residual or bulky waste from the tunnels at the end of a day.	Complete – July 2019
Occupation of the entire pre-treatment building at the ERF to reduce the reliance on the WTS for the inspection of residual waste.	Complete – July 2019
Instigate ongoing thermal imaging of residual waste in the WTS during its delivery, storage and transfer should it not be removed during the day of delivery.	Complete – July 2019
Ensure that LFB crews are familiar with the Beddington ERF and associated facilities.	Ongoing
Review of emergency protocols for staff evacuation and the diversion of phonelines to ensure business continuity during emergency situations.	Ongoing
Review of the communications protocol at the Beddington site to ensure that stakeholders are informed in a timely, helpful and responsible manner during incidents at the site with a community impact.	Complete – July 2019
Viridor and the SLWP to review communications protocols and test issues management responses on an annual basis.	Complete – July 2019
Work with the SLWP to communicate with residents in vicinity of site on appropriate materials that can be sent to Household Reuse and Recycling Centres in south London.	Following the submission of this incident report
Share lessons learned following the Beddington WTS fire and with the wider Viridor organisation and SLWP.	Ongoing



Report to: South London Waste Partnership Joint Committee

Date: 23 July 2020

Report of: South London Waste Partnership Management Group

Author(s):
John Haynes (South London Waste Partnership Communications Advisor)

Chair of the Meeting: Councillor Hilary Gander

Report Title:
**Communications and Engagement
South London Waste Partnership - Phase A and Phase B contracts**

Summary

This paper provides an update to Members of the South London Waste Partnership Joint Committee on communications and stakeholder engagement activities relating to the Partnership's Phase A (transport & residual waste management, HRRC services and marketing of recyclates) and Phase B (residual waste treatment) contracts.

This report focuses on activity that has taken place between February and June 2020.

Recommendations

The Committee is asked to:

- Agree the 2020-2022 SLWP Communications Strategy document
- Note the contents of this report and comment on any aspects of communications and engagement activities relating to the Phase A and Phase B contracts.

1. 2020-2022 SLWP Communications Strategy

- 1.1 At the last meeting of the Committee, Members were presented with the findings of the latest triennial SLWP resident survey.
- 1.2 The research findings have played a key role in evaluating the success of the Partnership's communications and engagement activities over the last three years and in developing the 2020-2022 Communications Strategy for the Partnership.

- 1.3 The Strategy document, which is attached at Appendix A, achieves the following:
- Evaluates at a high level the success of the previous three year's communications and engagements activities
 - Uses research to inform the Partnership's objectives for the next three-year period
 - Sets out our strategy for how we are going to achieve those objectives
- 1.4 Members of the Committee are asked to review and agree the Strategy document, which will guide the Partnership's communications and engagements activities for the next three-year period.

2. National Recycling Awards

- 2.1 The Partnership's 'Destination Recycling' campaign (production of educational videos and subsequent targeted social media promotional campaign) has been shortlisted for a National Recycling Award 2020 in the *Campaign of the Year Above £20k* category.
- 2.2. Other shortlisted entries of note in this year's National Recycling Awards include:
- Viridor – for the Beddington Virtual Visitor Centre website (*Campaign of the Year Below £20k* category)
 - Veolia SLWP Communications Team – communications support for service change across the SLWP region (*Team of the Year - Commercial* category)
 - Croydon Council – for increasing recycling rates through service change (*Local Authority Success* category)
- 2.3 The National Recycling Awards is one of the sector's most prestigious award programmes. The winners will be announced on 15 December 2020.

3. Coronavirus pandemic

- 3.1 Much of the focus of the Partnership's communications and engagement activities since February 2020 has been on the response to the Coronavirus pandemic.
- 3.2 Restrictions on non-essential travel and social distancing guidelines have meant that many of the planned communications and engagement activities have been curtailed. Instead the focus of attention turned to ensuring that residents had access to accurate and timely information on their local waste and street cleaning services.
- 3.3 The impact of the pandemic has been felt across all of the Partnership's

activities. Communications and engagement has supported in the following way:

- Recycling and rubbish collections (falls outside of the remit for this Committee, but is summarised here as an important acknowledgement of the work that has taken place): Daily updates for residents on the status of their collection services and what they can do to support their collection crews through the challenging time. Support for Veolia's #StreetSmiles campaign – a way for residents to safely show their appreciation for their collection crews (it is worth noting that there has been a significant amount of gratitude shown by residents toward their collection crews in recent months). A letter of thanks from Members of the Joint Committee was sent to Veolia front line staff, noting their professionalism and commitment in keeping vital services running. The use of the advertising boards on the sides of the collection vehicles to thank local key workers.
- Waste treatment – Stakeholder relations, ensuring that Viridor received a daily update on the status of collection services across the region. A letter of thanks from Members of the Joint Committee was sent to Viridor staff at the Beddington ERF, expressing gratitude for their work and noting the vital role they were playing in supporting critical local services.
- Household Reuse and Recycling Centres – support for the temporary closure and then partial re-opening of the six HRRC sites across the SLWP region (more details below in section 5 of this report).

3.4 Coordinated by the SLWP Communications Advisor, borough communications teams have worked in partnership to ensure messages have been aligned and consistent.

4. PHASE A BACKGROUND

4.1 The Phase A contracts encompass transport & residual waste management, HRRC services and marketing of recyclates.

4.2 From a communications and stakeholder engagement perspective, the elements of the Phase A contracts that are of most significance are:

- the management of the six Household Reuse, and Recycling Centres (HRRCs), and
- the landfill operations at Beddington.

5. HOUSEHOLD REUSE AND RECYCLING CENTRES (HRRCs)

5.1 Site user customer satisfaction surveys continue to take place on a rolling basis across the sites (note they are currently suspended due to social distancing guidelines). The findings are reported back to this Committee in the Phase A & B Contract Management Report and are also published on the SLWP website.

- 5.2 In late March, the six HRRCs across the SLWP region were closed, in line with government guidelines, to slow the spread of Coronavirus. Clear messaging was shared with residents via the boroughs' communication channels. Residents were thanked for their patience and understanding and told that: 'Bulky items, garden waste, DIY waste etc. should be stored safely on your property until the sites are able to re-open.'
- 5.3 The HRRCs sites reopened on 13 May 2020 (with conditions and restrictions in place) to allow residents to make essential visits. The temporary conditions and restrictions were different at each site but included revised opening hours, visits by pre-booked appointment only and a restricted range of materials being accepted.
- 5.4 On 4 July 2020, the temporary restrictions and conditions at the HRRC sites were revised again, in line with the relaxing of government social distancing guidelines. These changes included accepting a wider range of materials for recycling and increased visitor capacity.
- 5.5 The phased re-opening of the HRRC sites has been supported by a comprehensive package of communications including:
- Key messages for the boroughs
 - Website content
 - Social media content
 - Temporary site signs
- 5.6 On the whole, the reopening of the HRRC sites has gone very well, with the majority of residents clear on the new rules and restrictions. A relatively small number of residents have taken to social media to express concerns about booking slot availability and queue times, but some have also been very supportive of the arrangements on site and sent messages of support and thanks.
- 5.7 Signs are currently being produced to promote the boroughs' garden waste and bulky waste collection services. These will be installed at the six HRRCs in the coming weeks.

6. BEDDINGTON LANDFILL OPERATIONS AND RESTORATION

- 6.1 This contract is operated by Viridor on behalf of the Partnership.
- 6.2 The focus of communications and engagement activities has been two-fold:
- Educating local residents and key stakeholders about the landfill operations at Beddington – i.e. how it has provided vital waste disposal capacity for hundreds of thousands of local households and businesses and how the site is being managed in order to minimise any negative environmental impacts;
 - Providing information on how the 120-hectare Beddington

Farmlands site (which incorporates the landfill) is being restored into a rich patchwork of habitats for wildlife with public access.

- 6.3 In June concerns were raised by local residents and stakeholders about nesting birds at the Beddington Farmlands site were being threatened by low water levels in the lakes and sludge beds (with foxes gaining access to the islands). These concerns were picked up by some local and trade media titles.
- 6.4 Viridor responded to these concerns explaining that the water levels were low due to an exceptionally dry April and May and that this period had overlapped with the COVID-19 lockdown restrictions and a period when the Viridor team were unable to attend the site to manage the sludge beds. The Viridor team working on the Farmlands has now returned to work and is supporting the active management of the sludge beds again.
- 6.5 The issues were discussed at the June meeting of the Conservation and Access Management Committee (which is attended by Sutton Councillors, local resident representatives, Sutton Council Officers and Viridor representatives, and acts as the key strategic decision-making body for the management of Beddington Farmlands). It was noted that Sutton Council are in the process of recruiting a Site Warden.

7. PHASE B BACKGROUND

- 7.1 The Phase B contract (residual waste treatment) was awarded to Viridor in 2009. In order to fulfill the contract, Viridor have constructed a £205m state-of-the-art Energy Recovery Facility in Beddington. Household waste from the four Partner boroughs that has not been sorted by residents for recycling is treated at the facility and used to generate electricity.
- 7.2 The SLWP Communications Advisor continues to work closely with Viridor to:
- Ensure Viridor are meeting their contractual requirements with regards to communications and stakeholder engagement around the construction and operation of the Beddington ERF
 - Ensure local people understand why it is we need an ERF and provide reassurance around the safety of modern, well-run facilities such as this
 - Ensure the Partnership understands the views of local people with regards to waste treatment and ERF technologies in particular.

8. BEDDINGTON ERF COMMUNICATIONS AND STAKEHOLDER ENGAGEMENT

- 8.1 Viridor continues to upload Emissions Monitoring Reports to the

Beddington ERF Virtual Visitor Centre (www.beddingtonerf.info) twice per month. These reports provide information on all the emissions covered by the Environmental Permit (regulated by the Environment Agency). This represents one of the most open and transparent approaches to the publication of emissions monitoring data from an ERF in the country.

- 8.2 There was a delay to uploading the emissions report covering the period 17-30 April 2020 to the Virtual Visitor Centre. This delay was caused by a fault with the printer terminal that produces the reports at the ERF. A note was uploaded by Viridor to the website explaining the situation. The issue was rectified and the report was uploaded on 3 June 2020 (c. three weeks later than scheduled). This issue did not delay the uploading of the May reports.
- 8.3 The SLWP Communications Advisor has been working with Viridor to review and make improvements to the way Beddington ERF emissions reports are shared on the Virtual Visitor Centre.
- 8.4 In recent months, there have been occasions when local residents and other interested parties have misinterpreted the emissions reports - particularly in relation to carbon monoxide. The following improvements (which came into effect from April 2020) are designed to help local people interpret the emissions reports more accurately and make any misinterpretation less likely:
- Updates to the 'Guidance note for reading the reports', which now includes more information on carbon monoxide monitoring and the recent (January 2020) Environment Agency permit variation
 - A new format for the supporting commentary sheet that goes at the front of each emissions report. This new table-based format is less text-heavy and easier to interpret.
- 8.5 Visits to the Beddington ERF Education Centre have been temporarily suspended, in line with government guideline designed to slow the spread of Coronavirus. Visits will be reinstated once it is considered safe to do so and is in line with updated Government guidelines.
- 8.6 The latest edition of the Beddington Community Newsletter was due to be published in the spring, but was postponed due to the Coronavirus pandemic. The SLWP Communications Advisor is now working with Viridor to update the content. Distribution (to c.14,000 households) is now planned for July/August 2020.

9. IMPACTS AND IMPLICATIONS

Legal

- 9.1 None

Finance

- 9.2 The South London Waste Partnership's Communications Advisor post is funded through the core activities budget.
- 9.3 A £25,000 annual Communications Budget is available to support communications and engagement activities.

10. RECOMMENDATIONS

- 10.1 The Committee is asked to:
- Agree the 2020-2023 SLWP Communications Strategy document
 - Note the contents of this report and comment on any aspects of communications and engagement activities relating to the Phase A and Phase B contracts.

**APPENDIX A
SOUTH LONDON WASTE PARTNERHSIP
COMMUNICATIONS STRATEGY
2020-2022**



Communications Strategy

2020-2022



Working together to tackle waste

CROYDON | Delivering for Croydon
www.croydon.gov.uk



1. Introduction

It has been a challenging but ultimately successful few years for the South London Waste Partnership boroughs.

At the time of writing the previous Communications Strategy (covering the period 2017-2019), the four partner boroughs were sending hundreds of thousands of tonnes of residual waste to landfill every year (the Beddington Energy Recovery Facility was under construction); operating four separate recycling and rubbish collection services; and struggling - along with the rest of the country - to improve their recycling rates (which had stagnated at an SLWP average of 39%).

Fast forward to today: The Beddington ERF is fully operational treating residual household waste and providing a safe, cost-effective and more environmentally sustainable alternative to landfill; the boroughs have rolled out a harmonised recycling and waste collection service to 400,000 households; and the SLWP recycling rate has leapt seven percentage points, placing all four boroughs amongst the top recycling performers in London.

Communications and engagement with residents and stakeholders has played an important role in supporting and facilitating these successes: Section 2 of this Strategy document provides more details on the contribution made and the outcomes achieved.

The next three years (2020-2022) look to be equally challenging, and again communications and engagement will undoubtedly play a key role: The boroughs must find a way of continuing to improve their recycling rates in order to help London meet its target of 65% recycling by 2030; the way we manage recycling and rubbish will need to support wider efforts to reduce carbon emissions, with all four SLWP boroughs making ambitious commitments to become carbon neutral in the coming years; and the Partnership boroughs must be ready to react, respond and maximise the local impact of any regional or national policies aimed at reducing waste, increasing recycling and supporting a more circular economy. All this set against a backdrop of a world trying to recover from the financial and social impacts of the coronavirus pandemic.

2. Scope of this Strategy document

This three-year Strategy document:

- **Evaluates** at a high level the success of the previous three year's communications and engagements activities
- Uses **Research** to inform our **Objectives** for the next three year period
- Sets out our **Strategy** for how we are going to achieve those objectives

What this document does not attempt to do is provide detail on how our communications and engagement activities will be **Implemented** over the next three-year period. That is the role of the annual communications plans developed by our key commercial partners, Veolia and Viridor.

3. Communications and engagement outcomes (2017-2019)

For the last 10 years, the Partnership's communication and engagement activities have been driven by evidence and intelligence gathered through robust social research conducted on a triennial basis (2010, 2013, 2016 and 2019).

Guided by the findings of the 2016 research, the SLWP Communications Advisor worked closely with communications colleagues from the four partner boroughs, along with the Partnership's two key commercial partners (Veolia and Viridor), to implement campaigns and activities that supported the objectives of the 2017-2019 Communications Strategy. The SLWP Communications Advisor would like to take this opportunity to thank the boroughs and commercial partners for their commitment, support and counsel during this period.

Following best practice, the 2017-2019 Communications Strategy (which was approved by the SLWP Joint Committee on 14 March 2017) set out a series of clear priorities (grouped into 10 key themes) along with measurable targets. Many of these ambitious and stretching targets were achieved, some partly achieved and a handful were not achieved. A summary of the targets, actions and outcomes can be found at Appendix A.

The same robust approach to identifying priorities and setting measurable targets will be adopted for this latest iteration of the South London Waste Partnership Communication Strategy.

4. Communications Priorities (2020-2022)

In summer 2019, the SLWP boroughs commissioned DJS Research to carry out scientifically-robust and representative research into the views of local residents around a wide range of waste management issues.

This latest research compared and contrasted findings with those obtained in 2010, 2013 and 2016 and identified some encouraging and interesting behavioural and attitudinal trends.

10 key themes come out of the research project and were presented to the SLWP Joint Committee on 4 February 2020. These themes have been used to help identify the key communications priorities for the Partnership for the next three years.

The table on the following pages:

- identifies each of the 10 key themes,
- provides evidence to support each theme (obtained from the DJS Research Report, 2019, unless otherwise stated), and
- sets out what the strategic approach to communications and engagement the Partnership will undertake in response to each key theme, along with a measurable target (wherever possible).
- *Note: an 11th key theme has been added since the Joint Committee in February 2020. This additional theme considers the short, medium and long-term impacts that the Coronavirus pandemic may have on attitudes and behaviours in relation to waste and recycling and how this might impact on the Partnership's communications and engagement activities.*

The targets will be measured in 2022, when it is recommended that the Partnership commissions further independent social research.

Theme	Evidence	Strategy
1. Residents are recycling more but struggling to waste less.	<ul style="list-style-type: none"> • Waste minimisation is at the top of the waste hierarchy for good reason - not producing waste in the first place is clearly the most effective and most carbon-beneficial way of tackling the waste challenge. • Residents are aware of the importance of producing less waste, but are struggling to achieve it. • 30% say they feel they produce less waste than they did a year ago. However, the majority (52%) say they produce 'about the same amount' and 17% say they produce more. Overall that's a positive balance of 13% - good 	<p>We will...</p> <ul style="list-style-type: none"> • Continue to promote the 'waste less' message through all of our communications. • Provide residents with practical ideas on how they can reduce the amount of waste they produce. • Lobby decision makers at regional and national levels to introduce policies that incentivise manufacturers and retailers to reduce packaging, making it easier for local people

	<p>but certainly room for improvement.</p>	<p>to produce less waste.</p> <ul style="list-style-type: none"> • Continue to work in partnership with Veolia to operate a comprehensive excess waste awareness process, including bin tags, letters and proactive door knocking to ensure residents that are producing too much waste are given the support they need. • Provide communications support to any boroughs looking to run targeted waste minimisation awareness campaigns (such as the Mitcham Excess Waste Project in Merton). <p>2022 Target...</p> <ul style="list-style-type: none"> • Increase the positive balance of residents who feel they produce less waste than this time last year from +13% to +20%. • Reduce the average amount of waste produced per person (per annum) across the SLWP region by 30kg.
<p>2. Recycling behaviours becoming more established - younger residents could still do more and there is latent potential to increase food waste recycling.</p>	<ul style="list-style-type: none"> • 3 in 4 residents now say they recycle as much as they can even it requires additional effort (a 17 percentage point increase since 2010). • 16-34 year-olds remain the age group least likely to make the effort to recycle (61% cf. 80%+ for all other age groups). 16-34 year-olds cite 'a lack of time' as the key reason for not recycling as much as they could. This recycling apathy amongst younger residents remains concerning, but there is hope: the 61% who now say they make the effort to recycle is a significant increase on the 54% of 16-34 year-olds who said they do so in 2016. • Food waste is the waste stream where residents are most likely to not be willing to make the additional effort to recycle (<i>based on tonnage data and feedback from door knocking surveys conducted on behalf of SLWP by Jump throughout 2019</i>). 	<p>We will...</p> <ul style="list-style-type: none"> • Explore technologies such as mobile apps that provide timely proactive recycling-related prompts, to remove the 'lack of time' barrier reported by the 16-34 year-old age group. • Continue to run targeted social media campaigns aimed at encouraging 16-34 years-olds to make more effort to recycle as much as they can - review how these campaigns are delivered to ensure maximum ROI is being achieved; identify and target local 'influencers'. • Run targeted campaigns (focusing on low participation areas) to improve participation in the food waste collection service. <p>2022 Targets...</p> <ul style="list-style-type: none"> • Increase the proportion of residents who say they recycle as much as they can even if it requires additional effort from 75% to 80%. • Increase the proportion of 16-34

		<p>years-olds who say they recycle as much as they can, even if it requires additional effort, from 61% to 70%.</p> <ul style="list-style-type: none"> • Increase participation in the food waste recycling collection service in targeted areas by 15%.
<p>3. Thirst for more recycling information</p>	<ul style="list-style-type: none"> • As residents make more effort to recycle, their desire for information about what can and can't be recycled is also growing. • 33% 'strongly agree' that they need more information on what can and can't be recycled, compared to 27% in 2016 and just 16% in 2013. • Cuts to communication budgets have had an impact on how well informed residents feel about recycling services: 52% of residents feel their council keeps them 'very well / well informed' on what can and cannot be recycled - down from 56% in 2016 and 68% in 2013. • However, there are reasons to be encouraged: there has been a significant increase in Sutton for informed levels from 48% in 2016 to 56% in 2019. This may well be the impact of enhanced communication with residents as a result of the new Environmental Services contract with Veolia, which includes provision for communications and engagement. • It is anticipated that the other three boroughs, who have joined the Environmental Services contract more recently than Sutton, will see similar increases in the years to come. 	<p>We will...</p> <ul style="list-style-type: none"> • Strike a careful balance - providing clear and simple information for residents who could be put off recycling if it's made 'too complicated' in their eyes; but also provide comprehensive and detailed information for residents who want to know more. • Ensure recycling information is consistent across the four SLWP boroughs. • Explore the possibility of developing (and widely promoting) a web-based 'Encyclopedia of Recycling'; a comprehensive guide to recycling in the SLWP region - a single comprehensive source of information that all four partner boroughs could direct residents to. <p>2022 Target...</p> <ul style="list-style-type: none"> • To reduce the proportion of residents who strongly agree that they need more information on what can and can't be recycled from 33% to 25%.
<p>4. Individuals concerned their recycling efforts are just a drop in the ocean</p>	<ul style="list-style-type: none"> • Residents are recycling more because they 'know it's the right thing to do'. But they are becoming increasingly concerned that their efforts are just a drop in the ocean and can't make a tangible difference. • The proportion of residents who 'strongly agree' that their efforts to recycle make a difference has fallen in recent years, from 43% in 2013, to 42% in 2016 and 38% in 2019. • This downward trend must be halted if commitment and enthusiasm to recycle is to be maintained. 	<p>We will...</p> <ul style="list-style-type: none"> • Run awareness campaigns that make it clear how the efforts of individuals really add up if everyone plays their part - Recycle for London's recent 'It's just one bottle.... said 8 million people' campaign (Recycle Week 2019) is a good example of the sort of message that needs to get through. • Ensure the importance of everyone playing their part in the recycling and waste minimisation effort is a theme that runs

		<p>through all of our communications.</p> <ul style="list-style-type: none"> • Continue to reassure residents that their efforts are worthwhile - using existing resources such as the <i>Destination Recycling</i> films. Proactively tackle concerns raised by residents that collection crews do not always keep materials sorted. <p>2022 target...</p> <ul style="list-style-type: none"> • To have halted the downward trend and to see the proportion of residents who 'strongly agree' that their recycling efforts make a difference increase to 43%, returning them back to their 2013 levels.
<p>5. Contributing to a net zero carbon future</p>	<ul style="list-style-type: none"> • For many years, local councils have been judged primarily on their recycling rates. But it's not as simple as that anymore. • Carbon emissions has become a vital consideration and one that residents are quickly waking up to thanks to the efforts of pressure groups such as Extinction Rebellion. • All four SLWP boroughs have declared climate emergencies and have made ambitious commitments to become 'carbon neutral' over the next 10-20 years. The way we collect and manage residents' recycling and waste will need to play an important role in helping the boroughs achieve those targets. 	<p>We will...</p> <ul style="list-style-type: none"> • Explain to residents what 'carbon neutrality' is and the role waste collection and management can play in helping the boroughs achieve their targets. • Develop a compelling narrative that explains how the Beddington ERF can support the boroughs' journeys to carbon neutrality - communicate the carbon benefits of the ERF over landfill and fossil fuel sources of energy. • Share with residents any steps being taken to minimise carbon emissions from our waste collection and management activities. • Engage and consult with local community groups, pressure groups and the Council's Citizens Assemblies. <p>2022 Targets...</p> <ul style="list-style-type: none"> • 50% of residents will have an understanding of the terms 'carbon neutrality' / 'net carbon zero'. • 33% of residents to have some awareness of the steps their local council is taking to reduce the carbon impact of waste collection and treatment.

<p>6. Improving satisfaction with waste collection and street cleaning services</p>	<ul style="list-style-type: none"> • The new harmonised recycling and waste collection service rolled out across the four SLWP boroughs in recent years has resulted in a very significant rise in recycling rates. • However there has also been a reduction in resident satisfaction with the collection and street cleaning services - this is not uncommon following service changes on this scale. • It is important that satisfaction with the services improves, whilst sustaining the recycling performance. • Net satisfaction with the recycling and waste collection service across the SLWP stands at 64% - satisfaction rates correlate with the scale and recency of changes to the service (with satisfaction lowest in Merton and highest in Kingston). • Net satisfaction with street cleanliness across the SLWP region stands at 54% (residential roads) and 46% (town centres). 	<p>We will...</p> <ul style="list-style-type: none"> • Continue to work with Veolia to ensure proactive and reactive communications is of a high quality and builds confidence in the services. • Provide improved communications to Flats Above Shops to support compliance with the collection service in high profile town centres and shopping parade areas. • Support and promote community-led activities such as community clean-ups. <p>2022 Targets:</p> <ul style="list-style-type: none"> • Improve resident satisfaction rate for recycling and waste collection service from 67% to 75%. • Improve resident satisfaction rate for street cleaning service from 54% to 65% (residential streets) and from 46% to 60% (town centres).
<p>7. Trust in local councils is high</p>	<ul style="list-style-type: none"> • A real success story for the Partnership in recent years: In 2010, 31% of residents had 'serious concerns' that their council does not recycle everything it could - a view that is periodically reinforced by news reports of recycling being sent overseas and disposed of irresponsibly by rogue operators. • Trust has been improving in recent years in the SLWP region. By 2013 just 27% had 'serious concerns', and this fell further to 19% in 2016 and 15% in 2019. • It is important that these high levels of trust are maintained if we are to convince residents to make the effort to recycle as much of their household waste as possible. 	<p>We will...</p> <ul style="list-style-type: none"> • Continue to reassure residents about where their recycling is taken and what it is turned into. • Be specific about the destination of recyclable materials - this gives the message authenticity and helps build trust. <p>2022 Target...</p> <ul style="list-style-type: none"> • Reduce the proportion of residents who have serious concerns that not everything they sort out for recycling is actually recycled from 15% to 13%.
<p>8. Improve the quality of recycling being collected (particularly from communal properties)</p>	<ul style="list-style-type: none"> • The quality of recycling collected from communal properties (where residents share communal recycling and rubbish bins) is, generally speaking, very poor. The Partnership boroughs currently have to send most of the recycling collected from communal bins for 	<p>We will...</p> <ul style="list-style-type: none"> • Provide clear and simple communications to residents on the importance of sorting recycling into the correct bins/containers.

	<p>additional sorting. This is expensive and the quality of recycling that comes out at the end of the process is not as high as that collected from houses on the standard kerbside collection service.</p> <ul style="list-style-type: none"> This is not a localised issue. On average, flat dwellers recycle half as much as those who live in houses. With purpose-built flats making up 37% of London's residential accommodation, encouraging greater household recycling by flat dwellers is key to increasing the capital's recycling rate. <i>With the number of people living in flats increasing (nearly all new build properties in London are purpose-built flats and by 2030 nearly half (46%) of London households will be purpose-built flats) finding solutions that deliver higher recycling participation by flat dwellers will be critical to delivering the Mayor's recycling target</i> (source: Resource London). An ongoing, large-scale study by Resource London ('Flats Recycling Project') is showing that improving the quality of recycling collected from flats is very challenging, requiring significant financial and resource investment. Despite the challenges, this remains an area worthy of attention as the boroughs look to further improve their recycling rates. 	<ul style="list-style-type: none"> Continue to work in partnership with Veolia to operate a comprehensive recycling contamination awareness process for properties on the kerbside collection service - including bin tags, letters and proactive door knocking. This will ensure households that are contaminating their recycling are made aware and provided with support and information - ensuring the quality of recycling collected on the kerbside service is maintained. Explore, run pilot projects and evaluate different methods for improving the quality of recycling being collected from communal flats in the SLWP region. <p>2022 Targets...</p> <ul style="list-style-type: none"> To have maintained the quality of recycling being collected from properties on the standard kerbside collection service. To have identified a package of interventions that can be rolled out to communal properties across the SLWP region that improves the quality of recycling being collected from communal properties.
<p>9. Awareness of Beddington ERF and the role it plays in managing our waste.</p>	<ul style="list-style-type: none"> Awareness of the Beddington Energy Recovery Facility (ERF) remains relatively low across the SLWP region at 32% (although significantly higher in Sutton - 51%). It is important that residents across the SLWP region understand what happens to waste they do not sort for recycling - why it is so much better than landfill, but why it is better still to recycle more and waste less. Support amongst residents for finding an alternative to landfill for non-recyclable waste is now very well established - 88% say it's 'very important'. But residents are less sure when it comes to the alternatives available. When prompted, 66% of residents agree that energy recovery facilities are a good way to dispose of our non-recyclable waste. But only 13% say they know 'a great deal' or 'a fair amount' about ERFs and the role they 	<p>We will...</p> <ul style="list-style-type: none"> Communicate openly and honestly with residents, explaining that, even with some of highest recycling rates in London, we are still left with c.180,000 tonnes (2018/19) of waste each year that has not been sorted for recycling. Explain why energy recovery is a good medium-term solution whilst longer-term cultural and national policies take effect that will see us move towards a position where we are less reliant on residual waste treatment. Ensure that renewable energy production is communicated more prominently as a benefit of the Beddington ERF, as that is a message that residents appear to be particularly receptive to. <p>2022 Targets...</p>

	<p>play. The SLWP has a duty to ensure that awareness and knowledge of what happens to non-recyclable waste increases in the coming years.</p> <ul style="list-style-type: none"> • Aside from sending less waste to landfill, the biggest benefit of ERFs is seen as being an alternative source of energy. 	<ul style="list-style-type: none"> • 70% of residents believe that energy recovery is a sensible medium-term solution for dealing with non-recyclable waste (up from 66% in 2019). • Increase the proportion of residents who feel they know 'a great deal' or 'a fair amount' about ERFs from 13% to 20%. • Increase awareness of the Beddington ERF across the SLWP region from 32% to 40%.
<p>10. Provide reassurance that the Beddington ERF is a safe, environmentally sustainable way of treating residual waste.</p>	<ul style="list-style-type: none"> • When talking about ERFs generally, residents say that emissions / pollution is the biggest area of concern (41% of respondents mentioning it - up from 35% in 2016). • It is important that local residents are reassured that the Beddington ERF treats waste in a safe and environmentally-sustainable way. 	<p>We will...</p> <ul style="list-style-type: none"> • Continue to promote the Beddington ERF Virtual Visitor Centre as a key source of information about the facility - including regular publication of emissions monitoring data. • Provide clear, factual and balanced information about the emissions from the Beddington ERF. • Work with Viridor to invite schools, community groups and other interested parties to visit the Beddington ERF site. • Hold Viridor to account on behalf of local residents when appropriate and ensure residents understand the role of the Environment Agency in regulating the facility. <p>2022 Target...</p> <ul style="list-style-type: none"> • Reduce the proportion of local residents who state emissions / pollution from ERFs is a cause of concern from 41% to 35%.
<p>11. Impact of the Coronavirus pandemic</p>	<ul style="list-style-type: none"> • In March 2020, the lives of all local people changed significantly as restrictions on movement were introduced by the Government to slow the spread of the Coronavirus. • It will take many years for the long-term economic, social and cultural impacts of the Coronavirus pandemic to be fully understood. • In terms of the impact on local waste, recycling and environmental services, there are likely to be many challenges. 	<p>We will...</p> <ul style="list-style-type: none"> • Seek to understand the medium and long-term impacts the Coronavirus pandemic will have on attitudes and behaviours in relation to local environmental services and adjust our 2022 targets (above) where appropriate. • Use all available opportunities to speak to residents about the Coronavirus pandemic and the

	<p>Questions we need to find answers to include:</p> <ul style="list-style-type: none"> ○ What impact has more people spending more time at home had on the amount of waste generated? ○ Has 'lockdown' impacted on residents' shopping habits and/or changed the way they deal with their waste at home? ○ How did residents change their behaviour in response to the temporary closure of some outlets for waste and recycling (such as charity shops, HRRCs, recycling banks etc)? ○ Has there been a long-term impact on fly-tipping and littering? ○ What are the new issues and challenges we need to tackle - such as disposable face masks and gloves contaminating recycling bins. ○ When will it be safe and appropriate to resume targeted face-to-face contact with households that continually contaminate their recycling or produce excess waste - what impact will the suspension of these engagement activities have on the quality / quantity of our recycling? <ul style="list-style-type: none"> ● Despite the many challenges, there are also likely to be opportunities that we can seek to maximise: <ul style="list-style-type: none"> ○ Greater appreciation for recycling and rubbish collection and street cleaning crews, who continued to provide a reliable service throughout the 'lockdown'. ○ Greater awareness and appreciation for the local environment and green spaces. ○ Reduction in commuting (and associated littering - alongside many other environmental benefits) as more people opt to work from home. 	<p>impact it's had on their shopping and recycling behaviours.</p> <ul style="list-style-type: none"> ● Develop strategies for tackling any new challenges that emerge, such as an increase in waste tonnages or a decrease in recycling rates. ● Maximise any positive long-term impacts, such as an increased appreciation of the work of our collection crews. <p>2022 Target...</p> <ul style="list-style-type: none"> ● It is not possible to set measurable targets as the impact of the Coronavirus pandemic on recycling behaviours is not yet full understood and robust benchmarking data is not available.
--	---	---

APPENDIX A

2017-2019 Communications Strategy

Summary of targets, actions and outcomes

The following table summarises the key themes, aims, objectives and measurable targets set out in the 2017-2019 South London Waste Partnership Communications Strategy (which was approved by the SLWP Joint Committee on 14 March 2017).

The 2017-2019 strategy was heavily informed by the findings of the 2016 resident survey, conducted by BMG Research. The table below uses the findings of the recently-published 2019 survey (conducted by DJS Research) to determine whether or not each of the targets has been achieved.

Theme (and key findings from 2016 resident survey)	Approach and targets	Actions and outcomes
<p>1. Residents believe they are recycling more; it is environmental concerns (rather than financial ones) that are motivating them to do so.</p> <ul style="list-style-type: none"> The proportion of residents who believe they recycle more than they did a year ago (31%) exceeds the proportion who feel they recycle less (6%). Almost all residents (94%) now say that they make use of their council's recycling collection service - up from 78% in 2012. Environmental issues remain the clear driver for recycling behaviour, with 60% of residents stating that this is their main motivation. 	<p>We will...</p> <ul style="list-style-type: none"> Ensure the environmental benefits of the SLWP's work are communicated more prominently than the financial benefits. Ensure the environmental benefits of the new Veolia collection contract are communicated clearly and effectively to residents - particularly in Sutton and Merton where recycling rates are expected to increase noticeably as a result of the service changes. <p>Target:</p> <ul style="list-style-type: none"> Increase the gap between the proportion of residents who feel they recycle more and those who feel they recycle less from +25 percentage points (31% cf. 6%) to +30 percentage points. 	<p>Action:</p> <p>Four comprehensive multi-channel communications campaigns developed and successfully delivered to support the roll-out of the new harmonised recycling and rubbish collection services.</p> <p>The environmental benefits of recycling more and wasting less clearly communicated and prioritised under 'reasons for change' messaging.</p> <p>Satisfaction with service change communications was high: Proportion of residents who agree they were kept well informed in the lead up to the service change:</p> <ul style="list-style-type: none"> Sutton - 67% Croydon - 84% Merton - 90% Kingston - n/a (service change not significant enough to warrant follow-up resident survey) <p>Achieved: 51% of residents now feel they recycle more than they did a year ago, compared to 5% who say they recycle less: a positive balance of +46 percentage points.</p>

<p>2. The power of social norms is leading to an ever-increasing mismatch between reported recycling behaviours and actual recycling tonnages</p> <ul style="list-style-type: none"> Residents have high aspirations for recycling in the area and a distorted view of current recycling rates. People believe the current recycling rate in the SLWP area to be 50% (it is actually 39%). They believe the boroughs should be aiming for a recycling rate of 78% in the next five years, but that a rate of 68% is 'achievable'. The reported increase in recycling behaviour does not play out in the actual tonnage figures: the recycling rate across the SLWP region has in fact decreased by 1% over the last three years (reflecting a national trend for stagnating or declining recycling rates). 	<p>Perhaps just by making local people more aware of our current recycling rates, we could help people recalibrate their views and this could spur them on to make more effort?</p> <p>We will...</p> <ul style="list-style-type: none"> Use every available opportunity to make residents aware of the Partnership's current recycling rate of 39% Tap into the high aspirations of local people by asking for their help in achieving a 65% recycling rate across the SLWP region by 2030 (in line with the Mayor of London's new provisional target) Support the roll-out of the new recycling and rubbish collection services: help achieve the key objective of boosting the boroughs' recycling rates. <p>Target:</p> <ul style="list-style-type: none"> That residents will hold a more realistic view of current recycling rates in the area, reducing the gap between actual and reported from +11 percentage points (50% - 39%) to +5 percentage points. To support an increase in actual recycling rates across the Partnership region from 39% to 43% 	<p>Current and targeted recycling rates formed a key message in communications developed to support service changes.</p> <p>Comprehensive 6-month multi-channel communications campaigns to support the roll-out of x4 collection services across the four SLWP boroughs.</p> <p>Conducted independent evaluations of the service change communications campaign to ensure 'reasons for change' message was getting through. Proportion of residents who agreed their council communicated the reasons for change well:</p> <ul style="list-style-type: none"> Sutton - 57% Croydon - 82% Merton - 77% Kingston - n/a (<i>service change not significant enough to warrant follow-up resident survey</i>) <p>Achieved: Residents now believe that 45% of household waste is recycled (against an actual value of 47%) - a difference of just 2 percentage points.</p> <p>Achieved: Recycling rates across the SLWP region have increased from 39% to 46%.</p>
<p>3. Recycling apathy amongst 'Millennials'</p> <ul style="list-style-type: none"> Recycling behaviours are less well entrenched amongst younger residents (16-34 year olds). 16-34 years olds are significantly less likely to state that they recycle as much as they can (54%) than other age groups. 16-34 years are significantly more likely than any other age group to identify a 'lack of time' as being a barrier to recycling more. 	<p>We will...</p> <ul style="list-style-type: none"> Engage fully with Recycle for London's three-year (2017-2020) communications and education campaign which will be focused on 18-34 year olds. Explore technologies such as Apps that provide timely proactive recycling-related prompts, to remove the 'lack of time' barrier reported by this age group. Explore and consider practicalities of establishing a dedicated social media platform for the SLWP (on-going resourcing will be an important consideration). Consider the use of new and innovative communication channels (such as targeted TV advertising) that should resonate more with 16-34 	<p>Utilised advanced social media targeting and programmatic digital advertising techniques to engage with 16-34 year-old demographic.</p> <p>Utilised targeted TV advertising to support the Sutton service change roll-out.</p> <p>2017 Recycle Week social media campaign ('What goes around comes around') aimed at 16-34 years old.</p> <p>Communications support for the SLWP boroughs' involvement in the TRIFOCAL project - aimed at 18-30 years olds.</p>

	<p>years olds, particularly in support of the service change taking place in in Sutton in April 2017.</p> <p>Target:</p> <ul style="list-style-type: none"> • Increase the proportion of 16-34 year olds who say they recycle as much as they can from 54% to 60%. 	<p>Achieved: 61% of 16-34 years olds now say they recycle as much as they can, even if it requires additional effort.</p>
<p>4. Trust is improving</p> <ul style="list-style-type: none"> • Only 19% of local people now have serious concerns that their council does not recycle everything it could, compared to 27% in 2012 and 31% in 2010. 	<p>We will...</p> <ul style="list-style-type: none"> • Continue to reassure residents about where their recycling is taken and what it is turned into. • Be specific about the destination of recyclable materials – this gives the message authenticity and helps build trust. <p>Target:</p> <ul style="list-style-type: none"> • Reduce the proportion of residents who have serious concerns that not everything they sort out for recycling is actually recycled from 19% to 15%. 	<p>Inclusion of ‘What happens to your recycling’ information added to the service Information booklets - distributed to every household in the boroughs as part of service change communications campaign.</p> <p>Planned and delivered ‘Plastic Planet’ social media campaign aimed at highlighting the impact of single-use plastic that is not recycled and reassuring residents that their plastics are handled responsibly.</p> <p>Commissioned and produced a high quality short film, ‘Destination Recycling’, that tells the story of what happens to recycling after it’s been collected from the doorstep.</p> <p>Destination Recycling film promoted via a comprehensive social media and programmatic digital advertising campaign.</p> <p>Achieved: Just 15% of residents now have serious concerns that ‘the council actually doesn’t recycle all the items collected for recycling’ - less than half the proportion that held those concerns nine years ago).</p>
<p>5. Strengthening support for finding new ways of tackling waste</p> <ul style="list-style-type: none"> • Almost all residents (94%) across the Partnership region continue to believe it is important that we send less waste to landfill. This is a view that has attracted widespread support over the last six years (2010 = 94% / 2012 = 95% / 2016 - 94%). There is evidence to suggest that views have strengthened slightly, with 81% of people saying they feel 	<p>We will...</p> <ul style="list-style-type: none"> • Continue to educate and inform residents across the Partnership region about the importance of sending less waste to landfill and what the alternatives are. • Confidently refute claims that the construction of the Beddington ERF is ‘controversial’ and is opposed by all local residents. • Ensure that renewable energy production is communicated more prominently as a benefit of the Beddington ERF, as 	<p>Ongoing communications and stakeholder relations work to provide balanced and accurate information about the Beddington ERF, how it treats non-recyclable waste safely, providing a more environmentally sustainable alternative to landfill.</p> <p>Worked closely with Viridor to develop and launch the web-based Beddington ERF Virtual Visitor Centre, providing residents with easy access to information about the facility..</p>

<p>this is 'very' important in 2016 compared to 76% in 2012.</p> <ul style="list-style-type: none"> • There is also strong support for energy from waste technologies, with seven in ten residents (73%) now agreeing that Energy Recovery Facilities (ERFs) are a good way of disposing of non-recyclable waste (up from 64% in 2012) and a further 75% agreeing that ERFs are a better way of disposing of waste than landfill (up from 70% in 2012). • What's particularly interesting is that there is no significant difference in residents' views on ERF technologies across the Partnership region - i.e. those that live in the locality of the Beddington ERF construction site are just as likely to support ERF technology as those that live in Kingston, for example. • When asked what the benefits of ERFs are, it is interesting that sustainable energy production is seen as more important than landfill avoidance per se. • Only 17% of residents say they know either 'a great deal' or a fair amount' about ERFs (although this has risen from 12% since 2012). So the efforts of the SLWP and Viridor to educate local people about ERF technologies may be working, but it is slow progress 	<p>that is a message that residents appear to be particularly receptive to.</p> <p>Target:</p> <ul style="list-style-type: none"> • Increase the proportion of residents who believe it is 'very important' we send less waste to landfill from 81% to 85% • Increase the proportion of residents who believe ERFs are preferable to landfill from 75% to 80% • Increase the proportion of local residents who feel they know 'a great deal' or 'a fair amount' about ERFs from 17% to 30% 	<p>Secured agreement from Viridor to upload emissions monitoring data from the ERF to the Virtual Visitor Centre twice per month - representing one of the most open and transparent approaches to the publication of emissions data of any ERF in the country.</p> <p>Achieved: 88% now believe it is 'very important' we send less waste to landfill.</p> <p>Not achieved: The proportion of residents who believe ERF's are preferable to landfill has dropped to 69%.</p> <p>Not achieved: the proportion of residents who say they know 'a great' deal or 'a fair amount' about ERFs has increased but only to 18%.</p>
<p>6. Growing awareness of the Beddington ERF, but still work to do</p> <ul style="list-style-type: none"> • Unsurprisingly awareness of the Beddington ERF amongst residents across the four boroughs has increased, from 23% (in 2012) to 30% in 2016. • Awareness in Sutton specifically stands at 50%. But surprisingly awareness amongst people who live in the six Wards surrounding the Beddington ERF site is much lower, at 31%. 	<p>We will...</p> <ul style="list-style-type: none"> • Continue to work closely with Viridor to ensure communities in the locality of the site are communicated with effectively. • Ensure that (as a minimum) Viridor are meeting their contractual requirements with regard to communications and community engagement around the waste treatment services they provide on behalf of the Partnership. 	<p>Beddington ERF Construction newsletters (x2) produced and distributed to 14,000 households.</p> <p>Numerous Beddington Farmlands Open Days coordinated, giving local residents the opportunity to visit the site.</p> <p>Awareness of the Beddington Community Benefit Fund raised through various local channels.</p> <p>Tours of the Beddington site for stakeholders and community groups.</p> <p>Development and launch of Beddington ERF web-based Virtual Visitor Centre - a high quality site that includes frequent uploads of emissions monitoring data.</p>

	<p>Target:</p> <ul style="list-style-type: none"> Increase awareness of the Beddington ERF amongst people who live in the six Wards surrounding the site from 31% to 50%. 	<p>Oversaw fit-out of the Beddington ERF Education Centre to ensure a welcoming and engaging environment for visitors the site.</p> <p>Supported Viridor in communicating progress on the restoration of the Beddington Farmlands.</p> <p>Partly achieved: Awareness of the Beddington ERF amongst residents who live in the six Wards surrounding the site has increased significantly, to 43%. Awareness in the Beddington North Ward (where the facility is located) now stands at 70%, although this is indicative only due to small sample size.</p>
<p>7. Recycling and energy recovery can live happily side by side in South London</p> <ul style="list-style-type: none"> 68% of residents say that the Beddington ERF will make no difference to their recycling behaviours, and that they will continue to make just as much effort as they do today once the ERF becomes operational in 2018. A further 22% say they will recycle more once the Beddington ERF becomes operational. 	<p>We will...</p> <ul style="list-style-type: none"> Confidently refute claims that the Beddington ERF will lead directly to a reduced inclination amongst local people to reduce, reuse and recycle. Consistently remind residents that whilst treatment of waste in the new ERF is preferable to landfill, it is still important that we reduce, reuse and recycle as much as possible. <p>Target:</p> <ul style="list-style-type: none"> Maintain the proportion of residents who state that their recycling behaviours will not be negatively impacted by the opening of the Beddington ERF. 	<p>Ensured that the importance of recycling more and wasting less was consistently communicated in all ERF communications materials (newsletters, Virtual Visitor Centre, social media etc.).</p> <p>SLWP involvement in the Beddington Community Liaison Group to ensure accurate and balanced messages are shared with the local community.</p> <p>Achieved: This question was not asked in the 2019 survey as the ERF became operational some 12 months before the survey was conducted. Current reported recycling behaviour and actual recycling tonnages show that ERF has not had a negative impact on residents' inclination to recycle.</p>
<p>8. Satisfaction with Recycling Centres is high</p> <ul style="list-style-type: none"> 87% of Household Reuse and Recycling Centre (HRRC) users are satisfied with the overall service provided, whilst dissatisfaction is low at just 6%. 	<p>We will...</p> <ul style="list-style-type: none"> Continue to work with Veolia to monitor customer satisfaction with the HRRCs and use the feedback to further improve the services offered. Ensure that (as a minimum) Veolia are meeting their contractual requirements with regard to communications and community engagement around the HRRC services they provide on behalf of the Partnership. 	<p>HRRC site user surveys conducted on a rolling basis with findings reported back on a regular basis to Contract Management Meetings and Joint Committee.</p> <p>Communications support for site upgrade work (Purley Oaks, Garth Road, Fishers Farm).</p> <p>Installation of 'Good to know' materials information signs at HRRCs sites across SLWP region.</p> <p>Communications support for trial policy change for vans and large vehicle entry conditions.</p>

	<p>Target:</p> <ul style="list-style-type: none"> Increase satisfaction with HRRCs amongst site users to 90%. 	<p>Not achieved: Satisfaction with HRRCs remains high but has dropped to 80%.</p>
<p>9. Residents feel less informed than they used to</p> <ul style="list-style-type: none"> There has been a significant decrease in the proportion of residents stating that their local council keeps them 'very' or 'fairly well' informed about what can and cannot be recycled (56% in 2016 compared to 68% in 2012). The only exception to this is residents in Kingston, where informed levels have remained constant. Equally there has been an increase in the proportion of people saying they need to know more about what can and can't be recycled (an increase of 11% since 2012 in the proportion of people who strongly agree with this). 	<p>We will...</p> <ul style="list-style-type: none"> Continue to recognise the importance of communicating with residents about why they should recycle more and how they can do that, using local services. Ensure that (as a minimum) Veolia are meeting their contractual requirements with regard to communications and community engagement around the waste collection services they provide on behalf of the Partnership – this includes an annual communication to all residents reminding them of what they can and can't recycle. Explore opportunities for, and the appetite amongst, the four boroughs to run regional communications campaigns once the harmonised collections contract is fully operational from 2019. Explore opportunities for external funding to support campaign delivery. Engage fully with Recycle for London's three-year (2017-2020) communications and education campaign which will be focused on 18-34 year olds. <p>Target:</p> <ul style="list-style-type: none"> To halt the long-term decline in reported informed levels and maintain the proportion of residents who feel their council keeps them 'very' or 'fairly well' informed about what can and can't be recycled. 	<p>Comprehensive multi-channel communications campaigns delivered in support of the collection service changes.</p> <p>Annual service reminder sent to every household (Sutton x3 / Merton x2 / Croydon x2 / Kingston x1).</p> <p>Provision of annual recycling and rubbish collection calendars to all boroughs.</p> <p>Developed and implemented a comprehensive 4-stage contamination and excess waste process (including tagging of bins, letters and proactive door-knocking) to educate households on how to use the recycling and rubbish collection service correctly.</p> <p>Involvement in the Resource London 2017 'Repair and Reuse Quarter' (waste minimisation events) including Jumble Trail events, Restart electrical repair workshops and 'Love your clothes' sewing workshops.</p> <p>Planned and delivered a successful 'Give food waste a fright' campaign - aimed at increasing awareness of food waste using a seasonal hook (pumpkin).</p> <p>Participated in the Recycle Week 2019 outdoor and social media advertising campaign - campaign artwork appeared across the tram network and on street-side advertising boards.</p> <p>Partly achieved: 52% of residents now feel their council keeps 'fairly' or 'very' well informed. So the decline in informed levels has not been halted but it has been slowed significantly. Additionally, informed levels in Sutton have increased significantly from</p>

		<p>48% (2016) to 56% (2019) - this reflects the fact that Sutton was the first of the four boroughs to enter the new Environmental Services contract and to benefit from the enhanced communications provision that contract brings.</p>
<p>10. A Partnership known for innovation and enterprise – delivering exceptional value for money and high quality services for local taxpayers</p> <ul style="list-style-type: none"> Awareness of the SLWP has doubled since 2012, from 12% to 23%. But that still means that three quarters of local people have not heard of the SLWP. 	<p>We will...</p> <ul style="list-style-type: none"> Continue to use SLWP branding where appropriate but be open-minded to running 'unbranded' campaigns if there is evidence to suggest these are more effective (a number of waste authorities are currently trialling 'unbranded campaigns'). Refresh the Partnership's Brand Guidelines and Brand Toolkit to reflect the wider scope of services it is now responsible for. Reinforce the message that the SLWP is simply a voluntary partnership between the four boroughs, and not a commercial organisation. Continue to raise the profile amongst the waste and government sectors by entering for industry awards, seeking relevant speaking opportunities and securing coverage in key trade publications (this will require the Partnership to agree a clear and strong view on current issues effecting the industry (see Appendix A)). Agree a 'waste and government sector spokesperson' for the Partnership that does not change each year in line with the Charing of the Joint Waste Committee (see Appendix A). <p>Targets:</p> <ul style="list-style-type: none"> Increase awareness of the SLWP amongst residents from 23% to 50%. To have been shortlisted for at least one relevant industry award. 	<p>Developed an excellent working relationship with Resource London (including being the first region to use the new user-tested service change communication materials).</p> <p>SLWP Communications Advisor invited to be part of Resource London Campaign User Group</p> <p>Developed relationships with trade media titles, including LetsRecycle and MRW, leading to widespread coverage of the Partnership's contracts with Veolia and Viridor.</p> <p>Widespread industry recognition for the Partnership's recycling rate success - award entries submitted.</p> <p>Partly achieved: Awareness of the SLWP has increased significantly, but only to 30% (not the target 50%).</p> <p>Achieved: The SLWP was shortlisted for a 2018 LGC Award.</p> <p>Achieved: Secured £45,000 of external funding to help pay for communications and awareness campaigns</p>



**SOUTH LONDON
WASTE PARTNERSHIP**

Report to: South London Waste Partnership (SLWP)
Joint Waste Committee

Date: 23rd July 2020

Report of: SLWP Management Group

Author(s): Andrea Keys, Interim Strategic Partnership Manager

Chair of the Meeting: Councillor Hilary Gander

Report title:

Risk Report

Summary:

This report summarises key risk areas which are facing the partnership boroughs in relation to the waste disposal functions of the Joint Waste Committee.

Recommendations:

The Joint Waste Committee is asked to note the contents of this report.

Background Documents:

Confidential risk register is held by the Interim Strategic Partnership Manager, Andrea Keys

1. BACKGROUND

- 1.1. This report summarises key risk areas for the waste management contracts overseen by the Joint Waste Committee, based on the South London Waste Partnership team's risk register; this report summarises the key risks that should be noted at committee level. The full risk register is considered at the SLWP's Strategic Management Group.

2. KEY RISK AREAS

- 2.1. Areas have been included in this report where they are considered strategically important, for example because they are high scoring in terms of impact and/or likelihood, or have changed significantly in score.

2.2. COVID19

- 2.3. The risk register includes the following risks: Residual waste increases leading to increased disposal costs not covered in budgets; and cost of recycling increases beyond forecasted rates. The recent COVID19 pandemic is likely to result in an increase in both residual waste tonnes and recycling tonnes collected at the kerbside, and this will result in higher levels of disposal and recycling costs. As lockdown measures ease, it is possible that waste arisings will return to projected levels. This risk will be monitored.

- 2.4. The COVID19 pandemic also presents the risk of staff shortages due to sickness. This risk has been effectively managed by both Veolia and Viridor through a combination of communications, revised operational measures, a rapid response to reviewing and, where required, amending risk assessments, and delivering on-going staff training. Both contractors responded swiftly to the crisis and have maintained the staffing levels required in order to deliver the services.

- 2.5. A further risk presented by COVID19 is the availability of PPE due to a sudden increase in global demand. This risk has also been managed by both contractors who have pooled resources across their national operations to ensure continuity of supply.

2.6. Recycling materials market changes

This area continues to present a significant risk. Following significant changes to global recycling material markets (for example China's changed import requirements), the value of some recycling materials has decreased significantly. As reported at previous Joint Waste Committee meetings, this has some impact on borough budgets (as some of our material has the potential to generate income depending on the recycling's sale value) and also has an impact on our contractors as recycling income is built into the financial models of several of our waste management contracts. This continues to present a risk and the impact of

a worsening level of income for recycling will continue to be managed through budget and contract management processes.

As a consequence of the market changes, reprocessors remain increasingly strict on the level of contamination they will accept in the recycling material. Material which is too contaminated requires further sorting if any of the material is to be recycled. Extra sorting increases the reprocessing costs for recycling and so some impact on budgets continues to be expected, as above.

Action currently undertaken to protect the quality of our recycling:

- An increasingly harmonised approach to recycling across the SLWP area means that messages about what to recycle can be simple and effective across our whole region. All boroughs now follow broadly the same recycling regime.
- Material which doesn't meet the contamination thresholds is being sent to specialist sorting facilities where the recyclable material is extracted.
- The poorest quality material we collect typically comes from communal collection containers where it is difficult to identify who might be putting the wrong material in the wrong bin, which can make communications work hard to target; we're working with organisations and networks to look at what we can learn from others and what good practice we can share in this area.
- The communal containers are typically collected on separate collection rounds which protects all the other recycling material we collect from unnecessary contamination.
- We're closely monitoring the quality of the materials being collected for recycling and the processes being followed to manage contamination.
- The "Destination Recycling" films, described in previous communications reports to this Committee, are available on the SLWP website and have been promoted through the boroughs. The films highlight the importance of sorting materials into the correct containers.

Further planned activity to reduce contamination:

- We're looking at how we can best use and target our communications activities to further reduce contamination, and this forms part of our 2020/21 communications work.

2.7. Impact of recycling value changes on our contracts

Financial issues within contracts can have significant impacts on contract performance, likelihood of contract disputes and ultimately contracts cannot operate unless they are financially sustainable. Pressures such as the current global recycling market must be carefully considered when we formulate our approach to procurement of contracts and services. The changes and unpredictability of the recycling markets, which affects all our

contracts, mean that this continues to be a key focus for us at the present time.

2.8. Defra strategy consultation

As reported to previous committee meetings, Defra ran a consultation last year (which closed in May 2019 and followed the publication of their Resources and Waste Strategy) on the following matters:

- Reforming the packaging producer responsibility regulations in the UK
- Introducing a deposit return scheme for drinks containers in England, Northern Ireland and Wales
- Measures to accelerate consistency in recycling for both households and businesses in England

In addition, the Treasury has run a consultation on a plastic packaging tax.

The SLWP team and the boroughs considered the proposals set out by Defra and continue to participate in the consultation process. SLWP will continue to manage any risks as well as opportunities that the proposals might present to the boroughs and the partnership.

2.9. Brexit

We are now in the ‘transition period’ until the end of 2020 while the UK and EU negotiate additional Brexit arrangements. Current rules on trade and travel will continue to apply and any new agreement will take effect on 1st Jan 2021. We will continue to monitor the potential impact of a ‘no deal’ scenario at the end of the transition period. Potential impacts, including those relating to the workforce, recycling markets and supply of consumables, will continue to be considered. We will continue to work closely with our contractors on the management and mitigation of any developing risks. As before, we do not expect any type of Brexit to prevent us from being able to safely dispose of our residual waste because of the waste disposal arrangements we have within the partnership’s own area. Recycling markets and exports could be impacted by Brexit and in particular any scenario where transport movement through UK ports is affected.

3. RECOMMENDATIONS

- 3.1.** It is recommended that the Joint Waste Committee note the contents of this report.

4. IMPACTS AND IMPLICATIONS

4.1. Legal

There are no legal considerations arising directly from the recommendation in this report

4.2. Finance

There are no financial considerations arising directly from the recommendation in this report

