



The Quality First Roadmap

Seeking a destination towards high-quality commodities



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Produced by The Recycling Association

The Quality First Roadmap Executive Summary

This report sets out how the UK can become a world-leading supplier of secondary commodities based on a core set of materials with paper and cardboard collected separately from other materials within household- and household-like collections. It sets out targets that have the potential to transform the way materials are collected, sorted and recycled in the UK and in international markets, with implementation to occur from 2023.

These targets are:

- Paper and cardboard to be collected separately in most circumstances from other materials by 2025. This would:
 - Benefit paper and cardboard recyclers who would receive a higher-quality raw material for recycling that would attract higher prices due to lower recycling costs
 - Allow for packaging such as plastic films and cartons to be collected as core materials separate to paper and cardboard as collecting all these together leads to high levels of cross-contamination
 - Prevent wet paper and cardboard contaminating plastics, metals and glass
- UK to achieve End-of-Waste status for paper and cardboard by 2025. This would:
 - Require UK paper and cardboard to have been separated at source and collected separately from other materials in household and household-like collection schemes
 - Necessitate development of UK End-of-Waste criteria for paper and cardboard that would include the requirement that paper and cardboard meets the EN643 standard. This standard would mean paper and cardboard includes no more than 1.5% non-paper components by dry weight prior to being delivered to paper and pulp mills in the UK or abroad
- Other packaging materials including plastics, metal and glass to reach End-of-Waste status at the latest by 2030 once standards similar to EN643 are developed for those materials. This would:
 - Require the development of UK End-of-Waste criteria or adoption of other existing criteria for plastics, metal and glass
 - Lead to high quality recyclate being provided to recycling facilities and ultimately manufacturers.



Introduction

By Craig Curtis, President, The Recycling Association



When The Recycling Association launched our Quality First campaign in 2016, it was because we feared that recycling markets across the globe would be harder to access unless we improved the quality of material we provided to them.

Those fears became real when China banned imports of plastics and mixed paper at the beginning of 2018 and will no longer accept any import of recycle (solid waste as it defines it) by the end of this year.

We have seen other countries in Asia, such as Thailand, Malaysia, Indonesia and India, introduce their own restrictions, while Turkey has announced a reduction in quota. Although quality has improved, unless we make it commodity grade, there is a risk that the UK will have a much smaller pool to trade into.

As was shown by the recent Biffa court case, we are no clearer on what is permitted for export in terms of outthrow, and if anything, it made it less clear and riskier to export.

With the UK consuming more paper and plastic than it produces, we are reliant on export markets so that we can continue to return these materials back to the places where they were manufactured for recycling into new products.

This is not just about the deep-sea markets though, mills and recycling plants in UK and Europe would much prefer to have a high-quality commodity than a product that contains non-target waste materials. Why should UK or international mills and recycling plants have the cost of contamination passed down to them because they are at the end of the chain? The worse the quality of material, the greater the cost of recycling and the more effort that needs to be taken to remove contamination.

It is now time for us, working in partnership with stakeholders such as retailers; manufacturers and local authorities, to transform the recycling industry into a producer of high-quality commodity grade recycled raw materials as part of the circular economy.

While the Resources & Waste Strategy put forward by the Government will help, there are also things we need to do to secure a successful future for UK recycling.

All parts of the circular economy need to share the process that leads to high-quality secondary commodities. Starting with better designed products for recycling, clearer labels on how to recycle on packaging, core materials used for manufacturing that are easy to recycle and easy to collect, greater consistency in collections, separate collection of paper and cardboard, plus investment in sorting infrastructure to enable us to produce commodity-standard material that is fed back into the circular economy.



Our Quality First Roadmap sets out ways in which the recycling industry can make its contribution towards providing high quality materials for the circular economy.



The Quality First Roadmap

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By 2030, the UK should aim to be a world-leading provider of recycled commodities to both UK and global manufacturers.

As part of the circular economy, UK secondary raw materials would be recognised as prized products by manufacturers who would be prepared to pay a premium for our secondary commodities.

With very low contamination in commodities provided by suppliers to the UK and global recycling industry, this would be the gold standard measure that would lead to investment in UK recycling and manufacturing infrastructure.

This Quality First Roadmap sets out how we can get there providing economic and sustainability benefits to the UK and global manufacturing supply chain.



Where are we now

When The Recycling Association launched Quality First in 2016, it was clear that we had to rapidly improve the quality of material we presented to the market and fast.

It is to the credit of local authorities, retailers, manufacturers, waste management companies, and recycling businesses that we managed to see a rapid improvement.

It wasn't enough.



At the beginning of 2018, China banned the import of mixed paper and almost all plastics for recycling.¹

When China reduced its outthrow limit to 0.5% in 2018 from 1.5% previously for paper, our industry responded and met this specification.²

It still wasn't enough.

At the end of 2020, China will completely ban imports of solid waste³.

But China is not alone on this. Indonesia has restricted contamination to 2% for paper and is believed to be on a roadmap that replicates an eventual ban like China. This is shown by the recent introduction of a challenging registration scheme for exporters by the Indonesian Government. Malaysia is believed to be on the verge of introducing inspections of recovered fibre. Vietnam has also introduced new laws that will bring in restrictions on imports.

With the UK collecting 7.5 million tonnes of paper for recycling each year, and only producing 3.9 million tonnes, it is absolutely vital for the UK that we are able to return fibre back to where it was often manufactured in the first place⁴.

That does not mean we should not have more paper recycling infrastructure in this country, but it shows how necessary the export market will be for the recovered fibre industry.

For plastics, it is estimated that 5 million tonnes are used in the UK each year with 0.5 million tonnes of that exported in 2019 (down from 0.9 million tonnes in 2011)⁵.

In 2000, the UK household recycling rate was just 11%⁶, but by 2018 this had risen to 45% (having fallen from 45.5% in 2017)⁷ falling short of the 50% target by 2020 that now looks unreachable.

Although we have made vast progress in that time, there is still much more we can do.

The Resources and Waste Strategy for England⁸ is a gamechanger as it will force producers to place products on the market that are easily recyclable or face financial penalties.

Local authorities will be the beneficiaries of extra funding to improve recycling collections through Extended Producer Responsibility (EPR), while there should also be additional requirements for more UK-based recycling infrastructure.

The introduction of the proposed rules on consistency of household- and household-like recycling collections, Deposit Return Scheme (DRS) and the likely addition of films; flexibles and cartons to the core collection materials, in the shortly to be introduced Environment Bill, will inevitably mean

¹ <http://www.therecyclingassociation.com/latest-news/china-announces-ban-on-unsorted-papers>

² <https://www.rebnews.com/the-recycling-association-warns-that-chinese-increase-to-0-5-out-throw-will-be-extremely-tough-to-meet/>

³ <https://www.letsrecycle.com/news/latest-news/china-solid-waste-law-changes-from-september/>

⁴ <https://paper.org.uk/CPI/The-Paper-Industry/Key-Statistics/CPI/Content/The-Paper-Industry/Key-Statistics.aspx?hkey=74b0c013-ac93-4ab3-b4f3-abd31021f674>

⁵ <https://commonslibrary.parliament.uk/research-briefings/cbp-8515/>

⁶ <https://deframedia.blog.gov.uk/2018/12/12/englands-local-authority-recycling-statistics-published-for-2017-18/>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874265/UK_Statistics_on_Waste_statistical_notice_March_2020_accessible_FINAL_rev_v0.5.pdf

⁸ <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>



changes to the way we collect and sort material. In particular, DRS will necessitate a reconfiguration of materials recycling facilities (MRFs) as many drinks' receptacles are removed. This makes the introduction and implementation of the Environment Bill an ideal time to also introduce separate paper and cardboard collection arrangements and reconfigure MRFs to sort the non-paper material including plastics (eventually incorporating film), metals, glass and cartons if the latter and films are added to the list of core materials.

All of this presents us with a golden opportunity to collect vastly more material for recycling. But we also need to be careful that we do not create more volume, but then see the quality of the material we collect suffer.

According to recent commentary from the Materials Facility Reporting Portal, input contamination in England appears to be getting worse with the last quarter of 2019 the worst on record with just 83.4% of target material received compared to a high 87.2% in Q2 2016.

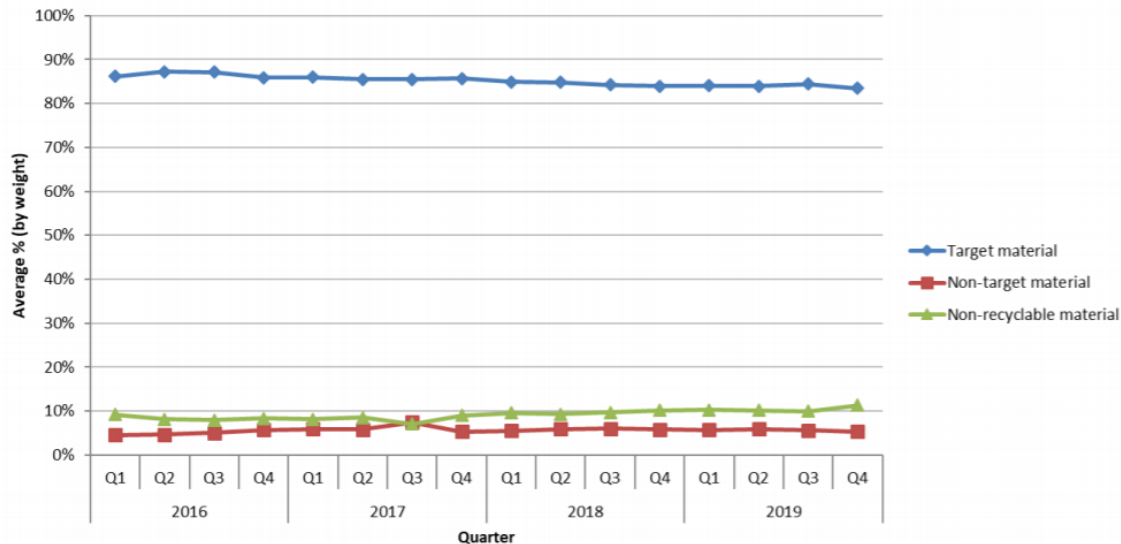
In Q4 of 2019, 5.3% of material received by MRFs was non-target recyclable material and 11.3% was non-recyclable material.

Table showing percentages of target material, non-target material and non-recyclable material

	Average percentage of composition		
	Target material	Non-target material	Non-recyclable material
2016 - Q1	86.1	4.6	9.2
2016 - Q2	87.2	4.7	8.1
2016 - Q3	87.1	5.0	7.9
2016 - Q4	85.9	5.7	8.3
2017 - Q1	86.0	5.9	8.1
2017 - Q2	85.5	5.8	8.5
2017 - Q3	85.5	7.4	7.0
2017 - Q4	85.6	5.3	9.0
2018 - Q1	84.9	5.5	9.6
2018 - Q2	84.8	5.9	9.3
2018 - Q3	84.2	6.0	9.7
2018 - Q4	83.9	5.8	10.2
2019 - Q1	84.0	5.7	10.3
2019 - Q2	83.9	5.9	10.2
2019 - Q3	84.4	5.6	10.0
2019 - Q4	83.4	5.3	11.3



Chart showing percentages of target material, non-target material and non-recyclable material



Source: Materials Facility Reporting Portal

Clearly, if the input source of the material is getting worse, then it makes it harder to produce a higher quality output.

According to this same data, in Q4 of 2019, the weighted mean average percentage of targeted material outputted by English MRFs for paper was 97.2%, 89.3% for plastic, 94.6% for metal and 91.4% for glass.

It can be seen from this data that even though paper had the least contamination, it was still on average 2.8% in Q4 of 2019.

This would not match the Indonesian contamination limit of 2% and would be nowhere near the 0.5% Chinese GB Standard specification. It also does not meet the EN643 standard where 1.5% is set as the contamination limit.

It would suggest that if some material is sorted to meet standards set out by international regulations, then other material is by definition not sorted to the same specification, and buyers of the highest quality are focusing on sourcing fibre from commercial sources that produce a higher quality bale than that sourced from councils.

For those buying materials for recycling, it cannot be acceptable that an average of 10.7% of plastics from local authorities is contamination, 8.6% for glass, 5.4% for metal and 2.8% for paper.

In the case of plastics, it cannot be right that more than 10% of the material collected is contamination. How can we create a valuable commodity-grade secondary plastic that replaces virgin material if a tenth of it is contamination?



A further complication is that there is no clear guidance or regulation on what is actually permitted for export. The waters have been further muddied by the recent ruling on Biffa that effectively made it up to a jury to decide if contamination in material makes it illegal or not, and that the requirements of the end destination are irrelevant⁹. In the absence of any clear regulations on the amount of contamination permitted for export, there is a risk that any load that would be considered as permissible by the end destination and the exporter, could be deemed illegal if it went to court and a jury found that way.

Legitimate exporters of recyclate are essentially at risk of prosecution if there is any contamination within the material and may be convicted if the jury were to decide that this contamination, no matter how small, is illegal. With contamination levels currently very high, this is a very real risk for the export industry.

This is not a situation that can continue within a global marketplace for secondary commodities as part of a circular economy.

It is up to the UK recycling sector and its supply chain to provide a commodity that is as close to pure as possible to both UK and international recyclers. The UK should position itself as the gold standard for recyclate quality and work towards a roadmap that eventually leads to an acceptable set of standards by 2030 at the latest but starting as soon as possible.

The targets of The Quality First Roadmap

It is intended that this roadmap will inform Government policy as part of the development of the Resources and Waste Strategy via the Environment Bill. But it will also be dependent on sectors such as the recycling industry, local authorities, retailers, manufacturers and other stakeholders taking action to create a gold standard UK recyclate marketplace.

The targets of The Quality First Roadmap are:

- Promotion of separate collection of paper and cardboard
- UK to achieve End-of-Waste Status for paper and cardboard by 2025
- Other packaging materials including plastics, metal and glass to reach End-of-Waste status at the latest by 2030 once standards similar to EN643 are developed for those materials

Promotion of separate collection of paper and cardboard

Our definition of separate collection of paper and cardboard is that these materials are placed in their own unique container with no mixing of other materials such as cartons, plastics, glass, cans or green waste.

There are different terminologies out there for collection schemes such as source segregated, multi-stream, two-stream, dual-stream and others.

However, in this report whatever the name of the collection system, we advocate that whether a council has a collection system that separates individual materials into its own unique container, or

⁹ <https://www.rebnews.com/wp-content/uploads/2020/07/Biffa-judgment-3-July-2020.pdf>



allows for some materials to be mixed in a bin or container, that paper and cardboard should always be separate from other materials.

In WRAP's *Supporting evidence and analysis: The case for greater consistency in household recycling*¹⁰, it states:

Financially, paper is the most important commodity and keeping it separate from other materials in order to keep it clean, dry and high quality is important.

In this report, WRAP makes clear that commingled collections by local authorities create the most contamination and “believes that the risk of not complying with the separate collection requirements of the Waste Regulations 2011 (as amended 2012) is greatest for this option owing to the potential for sub-optimal material quality for dry materials”.

Clearly, there will be challenges introducing separate collection of paper and cardboard in all areas, and it might be that commingled collections will be required for properties such as flats and some terraced housing where there is not space for more than one recycling bin.

With the funding from Extended Producer Responsibility (EPR) that will come to local authorities as a result of the Environment Bill, councils should have the opportunity to consider alternatives to a single commingled bin or single commingled communal bin. Just like landfill is at the bottom of the waste hierarchy, commingled paper collections should be at the bottom of the collection hierarchy.

Therefore, as part of this roadmap, it is proposed that by 2025, commingled collections of paper are phased out in the UK with separate collection of paper and cardboard mandated by Government and the devolved administrations as a minimum. If councils are unable to introduce separate collection of paper and cardboard in a particular area, then they should request an exemption from Defra or the devolved government outlining the exceptional circumstances that require commingled collection. Collection systems where cardboard is collected with food or garden waste should also be banned.

Those councils that operate existing separate collection of paper and cardboard already should be encouraged to keep existing arrangements. This process of removing commingled collections should begin in 2023, although councils that are able to switch sooner should begin to do so. This should be completed by 2025 as part of the Environment Bill implementation so that it is rolled out in conjunction with the introduction of core materials for packaging and recycling, EPR, DRS etc.

Clearly, this may necessitate some renegotiation of contracts, but the Environment Bill will mean that many councils will need to renegotiate contracts anyway, as DRS and other provisions when it becomes law will necessitate this. Therefore, it makes sense for this to be part of that renegotiation process.

Wherever collection schemes that collect paper and cardboard separately to other materials exist already, councils should maintain this form of collection.

Those that already provide separate collection of paper and cardboard should be encouraged to investigate ways in which the quality of their collections can also be improved. This should mean better and targeted communications, removal of cartons from separate paper containers, or

¹⁰ https://static.wrap.org.uk/consistency/Learn_more_about_the_evidence.pdf



investigating how changes of collection frequency affect quality if DRS leads to a reduced need to collect non-paper packaging.

Separate collection of paper and cardboard by 2025 as a minimum would mean that paper and cardboard would always be collected separately from everything else from domestic sources, but also household-like sources such as offices. The reason to do this is because paper and cardboard are easily contaminated by items such as food waste or broken glass, while they also act as a contaminant when wet paper wraps around plastic or glass bottles, or metal cans.

Removing paper from commingled collections would also allow for plastic film and flexibles to be collected with dry mixed recycling if they became a core material, which is believed to be under consideration by Government and devolved governments.

Plastic film is a huge contaminant for paper and cardboard because it is not easy to sort due to its 2D nature like paper. Plastic film and flexibles can also be contaminated by food waste, that also damages the fibre content of the paper.

If at some point plastic film and flexibles become mandatory collection materials for councils, it has the potential to damage the collection and quality of paper. WRAP guidance¹¹ on collecting films showed that plastic films contaminate higher value paper streams and noted: “If paper and card are collected separately from plastics (and other containers), such as within two streams, it is possible to use 2D/3D separation techniques to isolate film from the rigid plastic materials, again at the start of the process flow at a MRF.”

With the Government considering making beverage cartons core items for local authority collections, Tetrapak and similar beverage cartons should *not* be collected with paper as part of separate collections of paper and cardboard and should be phased out as soon as possible. These should be collected with other non-paper and cardboard core materials or separately.

Research undertaken by The Recycling Association for this report has found that 59% of council collections in the UK take both paper and cartons together (50% in dry mixed commingled collections, 8% in separate paper recycling containers, and 1% in paper and glass collections).

However, technology in MRFs can find it difficult to tell the difference between paper/card and a carton that is typically made of not just paper, but potentially metals and plastic too (particularly when it is flattened and appears to sensors that it is paper or card). Inevitably, by collecting paper/cardboard and cartons together, contamination levels are increased with cartons largely unrecyclable in a conventional papermaking process, and illegal to export as green list under Transfrontier Shipment Regulations.

Funding provided by Extended Producer Responsibility should also enable paper/cardboard to be collected separately to cartons and other materials.

As part of this roadmap, we therefore advocate that cartons are collected separately from paper by 2025 when mandatory separate paper and cardboard collections should be rolled out. The benefits of this are better quality paper/cardboard collection that is more suitable for domestic and international mills, and easier and better-quality recycling of cartons too.

¹¹ https://www.wrap.org.uk/sites/files/wrap/MST1445_Plastic_Film_Breifing_Note_final%20for%20web.pdf



It is absolutely vital that quality is put first, and any further inclusions to the list of core materials does not detrimentally impact on those materials, such as paper and cardboard, that are currently considered core.

Clearly, collecting paper and cardboard separately enables a purer stream of existing core materials such as cans, plastic bottles and glass bottles and jars, but also enables the wider collection of cartons and domestic films - enabling them to become core materials.

Additionally, the UK Government in England, Welsh Government and Northern Ireland Executive are considering introducing DRS and the Scottish Government has already decided to introduce it. This is expected to remove a significant amount of material from the domestic collection system. This should also enable more capacity for separate collection of paper and cardboard.



By removing paper and cardboard from other dry mixed recyclables, there should be additional capacity at MRFs for enhanced sorting.

DRS may lead to some councils considering reducing collection frequency if there are less drinks receptacles in the dry mixed recycling stream. But we would instead suggest that this additional capacity should be used to improve collection systems with quality being the primary aim. As councils

should also benefit from additional funding from EPR, there should be no reason to consider reduced collections, but emphasis should be entirely on quality first.

All the measures above should be funded by the Extended Producer Responsibility measures that are being introduced by the Environment Bill that is designed to help councils improve their recycling services.

UK to achieve End-of-Waste Status for paper and cardboard by 2025

In 2016, The Recycling Association took the bold step of introducing our Quality First campaign. It was clear then that something had to be done to improve quality or we would face the consequences.

Quality First has achieved notable successes in encouraging manufacturers to consider the recyclability of their products. It has also helped councils to consider how they can improve the quality of material they supply. It also had a strong influence in ensuring quality was an integral part of the Resources & Waste Strategy.

It proved to be a vital intervention and Quality First has been globally recognised as a significant driving force behind improving the quality of UK material for both the domestic and export market.

Despite the success of Quality First, we must recognise that even in those short four years, the marketplace has dramatically changed.



Four years on from the launch of Quality First, we need to take a further bold step and reclassify UK recycle from a waste to an End-of-Waste commodity.

There are significant benefits from introducing and meeting End-of-Waste criteria. Material that meets End-of-Waste is not subject to the extensive regulatory regimes that cover waste. This means rules and regulations on environmental permitting, shipment rules and duty of care do not or may not apply.

From a regulatory point of view, this should enable the enforcement agencies to take a lighter touch approach, cutting down on bureaucracy, saving cost and enabling focus on illegal operators. It should also bring clarity on defining the criteria under which material can be legally exported.

For stakeholder businesses, there will be the opportunity to trade a higher value commodity bringing in additional revenue, less form filling will reduce cost and reduce risk of prosecution. Those that export will also find it easier to trade a commodity outside of the confines of the Transfrontier Shipment Regulations and no risk of prosecution if they export End-of-Waste commodities legally.

In June 2020, Spain¹² set End-of-Waste criteria for paper and cardboard, while Italy's¹³ Environment Minister also decreed End-of-Waste regulations in September.

As Asian markets tighten, and Europe moves towards End-of-Waste, it is vitally important that the UK follows too. Additionally, this would give a positive message to all overseas markets about the quality of UK paper and cardboard.

We propose that the UK should achieve End-of-Waste Status for paper and cardboard by 2025.

This would require paper and cardboard to be collected separately from other core materials as detailed in the section above.

But it would also be necessary for UK paper and cardboard to meet as a maximum the EN643 standard that includes no more than 1.5% non-paper contamination when delivered to domestic or global mills.

Of course, when delivering material to countries or destination mills that have a lower specification than 1.5%, then this too would need to be met.

Over the next two years, The Recycling Association will work with other organisations and stakeholders to agree UK criteria for End-of-Waste for paper and cardboard.

Achieving End-of-Waste Status for paper and cardboard will mean that, as a minimum, domestic and international mills would receive paper and cardboard with no more than 1.5% contamination. This, we would hope, would become the standard that would be considered acceptable by UK environment agencies, and ideally would be specified via regulation.

By introducing this EN643 standard for paper and cardboard, it would differentiate those that act legitimately and those that trade illegal material.

While working to implement the EN643 standard, The Recycling Association will also investigate ways to monitor the quality of material. This could include use of the electronic tracking system,

¹² <https://www.rebnews.com/spain-sets-end-of-waste-criteria-for-recovered-fibre-based-on-une-en-643-standard/>

¹³ <https://www.grifal.it/en/plastic-tax-end-of-waste/>



Traqa, that is currently under development. Potentially, a certification scheme could be voluntarily implemented to show those that supply material that meets End-of-Waste Status and could be open to stakeholders including local authorities, retailers, manufactures, waste management companies, brokers, recyclers and others.

Other packaging materials including plastics, metal and glass to reach End-of-Waste status at the latest by 2030

Paper is the obvious choice to first achieve End-of-Waste status due to the existing EN643 standard on contamination levels.

But we should have the same level of ambition for packaging-based plastics, metal and glass and End-of-Waste criteria need to be developed for these too.

The Recycling Association is already engaged with other organisations on developing standards, and this work will continue.

By 2030 at the very latest, and ideally long before this date, we would hope that the UK had also adopted End-of-Waste Status for non-paper materials alongside paper and cardboard.

Clearly, there is a lot of detail that needs to be worked on to achieve this ambition, but if we can have End-of-Waste Status for the four core materials of paper, plastics, metals and glass, then we will have a highly efficient domestic and international marketplace for recycled materials.

Barriers and risks under the roadmap

Clearly, implementing this roadmap will not be a completely easy process, but the benefits outweigh the risks. By the end of 2030, the UK would be a world leader in recycling, providing the highest possible recycled products to manufacturers in the UK and globally.

However, some of the barriers and risks include:

Costs of retrofitting/reconfiguring MRFs



By switching to separate collection of paper and cardboard from other core materials, MRFs will need to be retrofitted to ensure paper collections are sorted separately (it could be that specific paper recycling facilities are required along the same lines as plastic recycling facilities) and to account for a greater amount of cartons and plastic film coming through the dry mixed recycling stream.

Funding for this should come through both the Extended Producer Responsibility Scheme for sorting packaging grades and possibly through



additional fees required to sort material to meet the maximum contamination specification as set out by the requirements of meeting End-of-Waste criteria. Additional contractual fees between waste management companies and local authorities will also be needed to sort non-packaging grades that will not be covered by Extended Producer Responsibility as this only covers packaging.

The introduction of DRS will most probably require a retrofit of MRFs anyway, and so it would also be logical to prepare them for the introduction of this roadmap too, especially if most of these measures were mandated as part of the Environment Bill when it becomes law.

Renegotiation of contracts

Some long-term contracts will need to be renegotiated, but this should be possible due to the stipulations of the Environment Act necessitating renegotiation anyway. Indeed, all parties should benefit from changes in contracts as potentially councils will have more funding under Extended Producer Responsibility, which would be passed onto their service providers.

Separately collected paper is not the holy grail

In the first few years of this roadmap, even by collecting paper and cardboard separately, it is likely there will still be significant levels of contamination. There will still need to be further sorting of separately collected paper and cardboard so that products such as cartons, nappies and other excess contaminants are removed. However, as councils switch to separate collection of paper and cardboard as a minimum, this will be an easier process than having to sort it from a commingled collection that also contains plastics, metals and glass. Again, this should be funded by Extended Producer Responsibility funding that will be given to local authorities. Those that sort the material should receive extra fees from councils to produce a commodity that meets End-of-Waste criteria.

Local authority buy-in

For this to work, local authorities will need to accept the measures proposed in this roadmap. Many councils have opted for commingled collections as it is a simple system for residents to understand and appears to be cost-effective. By switching to a minimum of separate collection of paper and cardboard, councils will be able to explain easily why paper and cardboard needs to be kept separate. Many already have this as their collection system already, so will not need to change.

Plus, as mentioned in the WRAP report on consistency of collection above, source separated and dual stream collections with separate paper and cardboard collections provide a purer product and more revenue potential. As stakeholders in the recycling supply chain, all parts need to ensure they are creating the conditions for the circular economy to operate efficiently and effectively.

Additionally, WRAP has made the case for consistency in recycling collections¹⁴ and introducing national core materials for recycling and separate collection of paper and cardboard will make it simple for residents to always understand the way in which recycling is collected.

¹⁴ https://static.wrap.org.uk/consistency/Learn_more_about_the_evidence.pdf



Conclusions

This roadmap has been designed to enable the UK to create a world-class recycling system that delivers a high-specification recycled product to UK and global manufacturers as part of the circular economy.

All stakeholders from local authorities, to waste management companies, to recyclers, manufacturers and retailers will benefit from the clarity it provides, as well as targets to work towards that ultimately benefit each of them.

It also fits nicely into the Environment Bill and Resources & Waste Strategy that is being undertaken by Defra, and works with the strategies in the devolved nations. For the UK environment agencies, implementation of this roadmap would also provide guidance on contamination tolerances for export, meaning they and the exporter would be clear on their responsibilities. At present, we have the muddled situation outlined by the recent Biffa case that it is essentially up to a jury to decide what constitutes legal and illegal contamination. That is no way for a multi-billion-pound industry to operate and needs to be fixed so that clarity is provided for all.

The roadmap also presents an opportunity to assess and invest in UK infrastructure benefitting the UK economy through domestic and international investment, creating jobs across the country and a cleaner environment.

This is the opportunity for the UK to become the world-leader in developing a system of excellence that creates the best product for sustainable manufacturing in the world. Potentially, UK material will attract a premium for its superb quality, helping to fuel further investment in the UK. This will be the case particularly if material that is exported from the UK has achieved End-of-Waste status.

It is our responsibility to begin the process that leads to the circular economy, and this roadmap will help deliver it.

The Recycling Association December 2020

Timeline

2023 Local authorities that currently collect paper and cardboard in commingled collections begin switch to separate collections of paper and cardboard from other core materials

2025 Local authorities complete removal of vast majority of commingled collection for paper and card, apart from exceptional circumstances where no other form of collection is possible

All local authorities collect almost all paper and cardboard separately from other core materials listed in the Environment Bill

UK achieves End-of-Waste status for paper and cardboard incorporating EN643 standard

Plastic film and cartons are collected as core materials separately from paper and cardboard

2030 Plastics, metals and glass packaging meet their own End-of-Waste criteria by this date at the latest

UK provides high-quality recyclate meeting End-of-Waste criteria to both the domestic and export market

