

Waste Management – Cardiff Council

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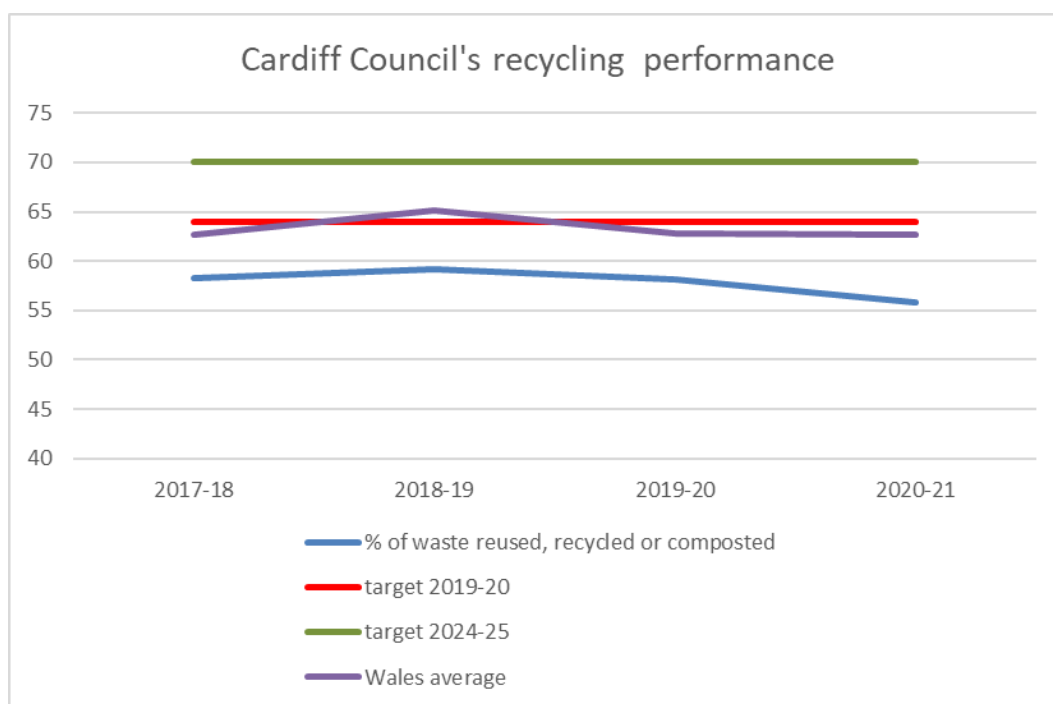
Summary report

Summary

What we reviewed and why

- 1 As shown in **Exhibit 1** below, Cardiff Council (the Council) has a history of poor recycling performance not able to achieve Welsh statutory recycling targets.

Exhibit 1: Cardiff Council's recycling performance



Source: Data Cymru

- 2 In March 2020, we completed a review of the Council's plans to reduce waste and achieve the national recycling targets. We found that the Council's necessary focus on resolving some longstanding operational issues meant that it was unable to improve recycling performance. It was only at a very early stage of deciding what its future direction would be in terms of its recycling, how it would get there and what it might cost.
- 3 As outlined in our 2021 audit plan, we have done a further review to consider how the Council is planning to reduce waste and improve its recycling performance. We completed our fieldwork between March and May 2022.
- 4 The Welsh Government has set long-term targets for recycling and re-use of municipal waste. The Welsh Government can levy financial penalties for non-compliance. The target for 2019-20 was 64% and the target for 2024-25 is 70%. The Council's performance in 2019-20 was 58.1%, followed by a fall in

performance in 2020-21 to 55.8%. The Council's recycling performance is currently the lowest in Wales. However, we recognise that the Council's recycling performance is better than comparable cities in England.

What we found

- 5 Our review sought to answer the question: Does the Council have robust plans to improve its waste management service and meet its statutory obligations?
- 6 Overall, we found that: the Council has poor recycling rates and needs to take urgent action to improve its recycling performance. We reached this conclusion because:
 - despite improvement in the management of the service, recycling rates remain poor and significantly below the statutory targets;
 - the Council has yet to implement a strategy to significantly improve its recycling performance;
 - the Council has not fully identified the resources needed to implement its recycling strategy or outlined and mitigated the risks associated with its implementation; and
 - the Council has yet to develop a fully integrated and longer-term direction for waste management.

Recommendations

Exhibit 2: recommendations

The table below sets out the recommendations that we have identified following this review.

Recommendations	
R1	The Council should implement a strategy to significantly improve service delivery and increase its recycling rate as a matter of urgency.
R2	The Council should ensure it allocates the resources it will need to implement its recycling strategy in its financial planning.
R3	The Council should ensure it understands the risks concerning the implementation of the recycling strategy and takes appropriate action to mitigate those risks. This should include the development of an engagement and communication strategy with residents and effective governance and oversight arrangements with councillors and senior officers.

Recommendations

- R4 The Council must continue to develop an integrated and longer-term approach to waste management. This should take into account:
- policy developments from the Welsh Government on waste and a circular economy;
 - wider social, economic and environmental goals that support the Council's wider objectives;
 - waste reduction and waste prevention; and
 - the sustainable development principle, including involving its communities and strengthening integration with other plans and policies.
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- R5 The Council should continue to explore how other organisations achieve better recycling outcomes and use this information to improve its own performance and shape its longer-term waste strategy.

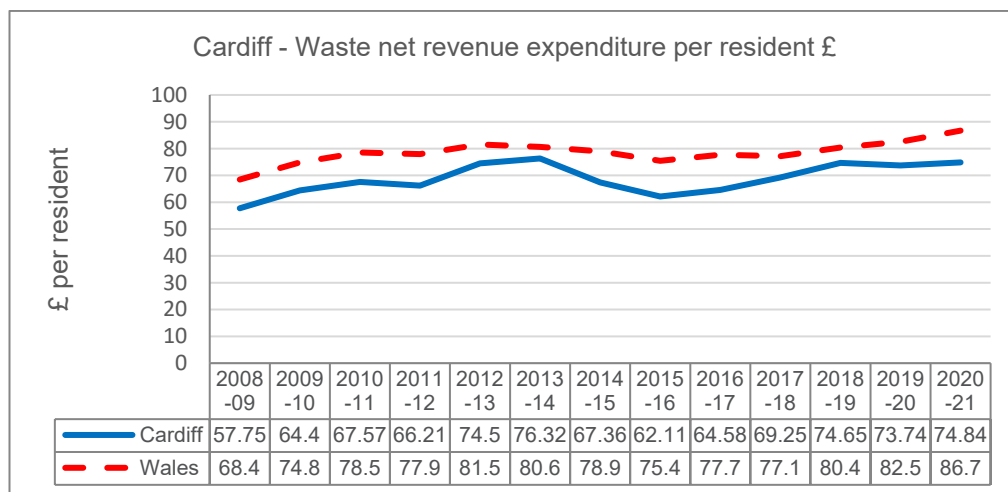
Detailed report

The Council has poor recycling rates and needs to take urgent action to improve its recycling performance

Despite improvement in the management of the service, recycling rates remain poor and significantly below the statutory targets

- 7 The Council's focus has been on addressing a series of longstanding operational issues. These include a pattern of overspends and unrealised savings, health and safety issues, high sickness absence, difficult industrial relations, and management and business controls not being in place or adhered to.
- 8 We recognise that the Council has made improvements to the management of the service. These improvements include:
 - a much-improved understanding of costs and performance across the service;
 - a more effective use of data;
 - the introduction of a new working pattern for waste collections; and
 - continued improvements to the overall control environment to address recommendations made by Internal Audit following a series of adverse audit opinions.
- 9 However, those improvements in the management of the service have not yet had a positive impact on the Council's recycling rates. The Council has a significant distance to travel and limited time available if it is to meet the statutory recycling target of 70% by 2024-25. Not meeting the target places the Council at risk of incurring financial penalties from the Welsh Government.
- 10 **Exhibit 3** below shows that the Council's expenditure on waste per resident has consistently been below the Welsh average. The Council's recycling performance has also been below the Welsh average.

Exhibit 3: waste net revenue expenditure per resident



The Council has yet to implement a strategy to significantly improve its recycling performance

- 11 Our interviews highlight that Council officers understand that the Council will need to change its approach to recycling if it hopes to meet the statutory recycling target of 70% by 2025. The Council has developed a draft recycling strategy for the period up to 2025. This is a short-term plan, which sets out how the Council could achieve the statutory target.
- 12 Meeting the 70% recycling target by 2024-25 will pose significant challenges for the Council. As we set out in the paragraphs below, the Council has significant work to do to implement its strategy. There are tight timescales involved to implement the strategy. The Council's plans do not have much contingency to absorb any unforeseen issues. There is a high risk that the Council may not achieve the statutory recycling target.
- 13 To maximise its chances of success, the Council will need to work quickly to:
- agree its recycling strategy and ensure there is member ownership of it;
 - strengthen governance and oversight arrangements;
 - identify the costs of implementing the recycling strategy and factor these into its financial planning;
 - develop a communications plan to involve residents in the changes; and
 - address specific challenges to improve recycling performance amongst houses of multiple occupancy and businesses.
- 14 We expand upon each of these in the paragraphs below.

There are currently not strong member governance and monitoring arrangements to drive improvement

- 15 At the time of our fieldwork, the Council did not have an agreed recycling strategy to improve its recycling performance. The draft strategy was out to public consultation. Cabinet is due to consider the draft strategy shortly.

- 16 It is crucial that members have ownership of the Council's recycling strategy if it is to increase its recycling performance. Members have a key role to play in their communities to also encourage residents to reduce the amount of residual waste and improve recycling.
- 17 The Council has been working with the Waste and Resources Action Programme (WRAP) and now has a detailed understanding of the city's waste and where the Council needs to focus its efforts. The Council's relationship with WRAP is considered to be positive and constructive by both parties. This should help the Council implement a better approach to recycling.
- 18 The Council has some governance arrangements in place, such as monthly meetings with Operational Managers and regular meetings between WRAP and the Council. Waste management is included as a risk on the Council's corporate risk register. Cabinet, and the Governance and Audit Committee, regularly consider the risk register. The Council also meets regularly with the Welsh Government Minister. However, the governance arrangements do not include a programme management board with elected member, senior officer and WRAP representation, as has been the case with other councils WRAP has worked with. Given the urgent need to improve its recycling performance, the Council needs to strengthen its governance and oversight arrangements at a senior officer and member level. This would ensure there is robust monitoring and challenge of progress of the implementation of the recycling strategy.

The Council has not fully identified the resources needed to implement its recycling strategy or outlined and mitigated the risks associated with its implementation

- 19 There are significant risks to implementing the Council's recycling strategy. We outline some of these in the paragraphs below.
- 20 The Council has not yet fully set out the potential costs of implementing its draft recycling strategy, which is clearly key to its implementation. The Council has started to plan for the changes and has made provision in the capital programme for replacement waste collection vehicles. However, the Council has not clearly articulated these costs to better inform members' decision-making. This will be particularly important given the wider financial challenges being faced by the Council and its estimated £90 million budget gap over the next four years.
- 21 There are a number of significant infrastructure changes and challenges associated with implementing the Council's recycling strategy. To implement a three-stream segregated recycling model, it will need to procure different vehicles to accommodate separate collection of recyclable materials. Supply chain issues are affecting many goods, including motor vehicles. This could cause further delays and increased expense as the Council seeks to replace its existing fleet. The draft strategy does not allow contingency for such delays.
- 22 The Council, advised by WRAP, has identified that fire regulations mean that the current Materials Reclamation Facility (MRF) at Lamby Way cannot be adapted to the segregated recycling collection model as the site footprint is too small. We understand that the Council is confident that it can mitigate the situation in the short term until a replacement site can be found and developed. However, these challenges illustrate the type of issues that could impact on the Council's plans.

They also emphasise the importance of robust oversight and programme management arrangements.

The Council has yet to develop a communications and engagement strategy to improve engagement with residents and drive improved performance

- 23 The Council does not have a communications and engagement strategy with residents to support improved recycling rates. It is important that the Council urgently develop a plan to support the transition to the service changes which are needed. Without a communications strategy, the Council is unlikely to achieve its ambition to improve its recycling performance.
- 24 The Environmental scrutiny committee's March 2022 inquiry into the Local Development Plan¹ suggests that the Council could do more to involve residents when it makes significant decisions. This included involving those persons who reflect the diversity of the population. Meeting the recycling targets is likely to involve a significant change to the way waste is collected. The Council will need to carefully consider how it communicates those changes to residents. The communications plan will need to be clear about what the changes are and when they will happen. The Council will need to set out how it will ensure there is effective communication with all parts of the community to support improved recycling rates.
- 25 The Council has piloted a three-stream segregated recycling model in specific areas of the city. We understand that, subject to a decision by Cabinet on the draft recycling strategy, the Council intends to roll out the pilot across the city. However, the Council has not yet set out the logistics and timing of this. Given the tight timescales involved, the Council will need to determine how it will take account of the feedback from residents on segregating waste so that this can help shape the implementation of the strategy.
- 26 The draft strategy says that the Council plans to review its arrangements for residual waste. The modelling work that the Council has done with WRAP shows that segregated recycling alone will not be sufficient for the Council to meet the 70% recycling target. Therefore, it is likely that to meet the statutory target, the Council will need to reduce and/or restrict the amount of residual waste residents present for collection. Other councils, such as Newport, Wrexham, Bridgend and Swansea, have made changes to their residual waste collections and have subsequently seen improvements in their recycling performance.
- 27 Any such restrictions to residual waste collections would represent a significant service change for residents. Changes to residual waste were not incorporated into the recycling pilot. Therefore, the Council has not tested the impact that might have on recycling rates, or on public opinion and behaviour. The Council should confirm its plans for recycling and residual waste and communicate them to residents as soon as possible. Without an effective communications plan, the Council is unlikely to achieve its ambition to meet the 70% recycling target.

¹ [Letter from the Environmental Scrutiny Committee to Cllr Caro Wild on the Local Development Plan, March 2022.](#)

Houses of multiple occupation and trade waste remain key challenges for the Council to resolve to improve its recycling performance

- 28 Flats and houses of multiple occupation (HMOs) present challenges for household recycling. Cardiff has a greater proportion of this type of housing than other councils in Wales. The Council recognises that it will need to address this challenge to improve its recycling rates. However, it has not yet identified a comprehensive solution to this. The Council is at the early stages of undertaking joint work with Swansea and Newport councils to consider potential solutions. It is also implementing small scale changes. These include making changes to the size of the apertures in communal bins to try to minimise contamination.
- 29 Based on modelling undertaken with WRAP, the Council will also need to make changes to its trade waste collection service if it is to meet the 70% recycling target. Trade waste recycling rates are included in the Council's overall recycling performance. Because the proportion of trade waste is lower than for households, this has the effect of reducing the Council's overall recycling figure. The legislation regarding trade waste is due to change in 2023. This will require commercial businesses to present recycling in separate streams. In advance of the change in legislation, the Council is encouraging commercial customers to engage in recycling and has stopped taking on residual waste only contracts.

The Council has yet to develop a fully integrated and longer-term direction for waste management

- 30 As the Council has been focused on managing operational services issues and the impacts of the pandemic on the service, it has had a reduced focus on the longer-term strategic direction of the service. As a result, the Council's longer-term thinking remains under-developed. This could adversely impact on its wider approach to climate change set out in its One Planet strategy.
- 31 In March 2021, the Welsh Government published 'Beyond Recycling'², its strategy for the circular economy in Wales. The Council has yet to fully develop its approach to this strategy and more recent Welsh Government policy developments on waste and the circular economy. The Council has yet to plan and shift its focus beyond meeting the statutory recycling targets to how its approach to waste can help reduce carbon emissions.
- 32 The Council should consider and build on some of the Council's positive work with Benthg Cymru³ and the Repair Café Wales.⁴ It should reflect wider social, economic and environmental goals that support the Council's broader objectives.

² [beyond-recycling-strategy-document.pdf \(gov.wales\)](#)

³ www.benthg-cymru.org/

⁴ repaircafewales.org/

- 33 As the Council develops its broader strategic direction for waste management, it should ensure that it is underpinned by the sustainable development principle. For example:
- the Council has yet to ensure that its longer-term approach to waste management is aligned to its decarbonisation strategy (One Planet Cardiff⁵). Currently, its decarbonisation team and its waste management service do not fully work in an integrated way.
 - whilst the Council has an officer whose role includes looking at planning applications to consider the implications for waste collections, planning and waste management services do not work in an integrated way. This is key to ensure future housing developments encourage greater re-use and recycling. This would also help ensure that existing challenges associated with flats, HMOs and high-density housing are not perpetuated.
 - involving communities will be key to taking forward waste prevention and reduction initiatives.
- 34 The Council has looked outside Wales for good practice, for example, approaches to recycling in flats in London. We would strongly encourage the Council to continue to look for good practice, including outside of the UK. There may not be a single exemplar that can be successfully adopted wholesale in Cardiff. However, there may be ideas or innovative practices that the Council could incorporate into its approach.

⁵ [Our vision for a Carbon Neutral City by 2030, One Planet Cardiff](#)



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