

Response submitted online

[recycling@defra.gov.uk](mailto:recycling@defra.gov.uk)

2<sup>nd</sup> July 2021



EAUC

University of Gloucestershire,  
The Park, Cheltenham,

GL50 2RH

Office Tel: 01242 714321

[info@eauc.org.uk](mailto:info@eauc.org.uk)

[www.eauc.org.uk](http://www.eauc.org.uk)

Dear Sir/Madam,

Please find below our response on the following consultation.

- Consistency in Household and Business Recycling in England

### **EAUC – The Alliance for Sustainability Leadership in Education:**

Response on behalf of our Members (United Kingdom and Ireland)

#### **About the EAUC**

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £43 billion, responsible for educating over 4.5 million students supported by over half a million staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

#### **We believe**

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

#### **Our values**

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice
- Collaboration - together we go further
- Role Model - leading by example
- Empowering - supporting and inspiring our members

## **Response to the consultation:**

### **Consistency in Household and Business Recycling in England**

We submitted responses to both the first and second consultations on Introducing Extended Producer Responsibility for packaging across the UK and introducing a Deposit Return Scheme in England, Wales and Northern Ireland. We are in favour of both the DRS and EPR, both of which should be implemented within the original timeframe of 2023 and not the revised target date of late 2024.

Changes to recycling collections for household and business recycling are long overdue and EAUC welcome this consultation as a real opportunity to close the loop and increase England's recycling rates which have remained static for some years. The policy created with a target of 65% recycling by 2035 while encouraging could be more ambitious. We would also like to see a greater emphasis on reduction and reuse before recycling.

Consistency is key and this is an area that affects the Further and Higher Education sector considerably. Universities and Colleges collections are often constrained by waste contractors and local authorities. Different regions of England have access to different waste management infrastructure which adds to the confusion and inconsistency of waste collections. For example, students in student housing have to navigate up to three different collection systems (term time, non-term time residences and campus) which can be very confusing. It is worth noting that those in Houses in Multiple Occupation and flats may require additional support due to space issues and increased risk of contamination from shared recycling areas and collections.

Universities and Colleges have expressed frustration with the quality of data collected and shared by waste contractors. Different waste contractors provide different data sets which are often inconsistent and incomplete. This data is crucial for the sector with regards to improving waste and recycling. There should be standardisation for private waste contractors with a clear streamlined approach to data collection.

While we are not able to respond to all the proposals individually we have provided feedback on two of the proposals we feel most relevant to our members.

We agree with Proposal 17 and the dry recyclable waste streams collected from non-household municipal premises and households be the same materials. This will reduce public confusion and contamination and increase levels of recycling. With the main categories of glass, paper and card, metal and plastic to be collected separately, the proposal of any additional materials would need to be clearly communicated to both households and businesses to reduce the potential risk of contamination as well having the collection, sorting and reprocessing infrastructure available to across all England.

Proposal 19 requirement for all to collect food waste separately from other waste streams would again need to be communicated clearly and processes in place to reduce contamination. The food waste hierarchy is critical here as if it can be eaten it should be eaten and should not be wasted, if it cannot be eaten it should be recycled. Further emphasis must be placed on food reduction and redistribution to avoid food being wasted in the first place. EAUC and our members already have partnership working with WRAP, Guardians of Grub, Love Food Hate Waste, Community Fridges, Too Good To Go and Olio amongst others.

Resources will need to be provided to improve communication but also behaviour change campaigns. Bins and labelling will need to be clear and consistent. Waste contractors and local authorities must work with partners as well as the public to improve household and business collections consistency. There is also an

opportunity for tertiary education and business to work together on innovations and solutions to the issue of waste reduction, reuse, recycling and closed loop.

We hope you find this information useful and we would be keen to discuss the role of Further and Higher Education with tackling waste and recycling moving forward.

Yours sincerely



Iain Patton  
CEO