

Business of Recycling Wales- Webinars

Hospitality & Food Service Sector- 7 February 2024

Q&As

This document presents WRAP Cymru’s answers to the questions delegates asked during the ‘Hospitality and Food Service Sector’ webinar. We have grouped questions by theme; sometimes there is a single answer for multiple questions.

You can watch the webinar and access the slides here: [Workplace Recycling -Webinars \(wrapcymru.org.uk\)](https://wrapcymru.org.uk)

Code of Practice: [Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales | GOV.WALES](#)

There are resources available to help you get ready here: [The Business of Recycling Wales Guidance for all workplaces \(wrapcymru.org.uk\)](#)

Question	Response
Can I still use my current blue bag for commercial recycling?	You will need to speak to your waste collector to find out how they’d like you to present your recycling.
Can I still use my current white bag for recycling?	
What size liners are available? Can I use single-use black sacks as liners for our food waste bin?	
What is the name of the new legislation?	The Waste Separation Requirements (Wales) Regulations 2023. https://www.legislation.gov.uk/wsi/2023/1290/contents/made
We have been offered the chance to set up a working group for the new regulations through UKH Cymru. Would you be interested in reaching out to this group?	WRAP will be part of the working group.
Enforcement	
Are there any specific requirements for food waste bins in kitchens? For example, specific colours, lids, pedal operated functionality, etc.	There is no specific requirement regarding the colour of bins, but the FSA has published information about how food waste should be stored: https://www.food.gov.uk/business-guidance/food-and-cooking-oil-waste#how-rubbish-is-stored
Anaerobic digestion (AD)	

<p>Where are the AD plants located in Wales where the food waste will be going?</p>	<p>There are a number of AD plants located across Wales. Please speak to your waste collector to confirm the location of where your food waste goes or check your waste transfer notes.</p> <p>You may also see a map of all AD plants here: https://www.biogas-info.co.uk/resources/biogas-map/</p>
<p>Backhauling</p>	
<p>What if materials are backhauled to a central location for processing?</p>	<p>If an organisation intends to backhaul targeted waste using their own fleet of vehicles to their own facilities, thus never presenting their waste for collection, that is acceptable. They would not require separate food waste bins. However, they may need to supply internal food bins for their staff, visitors and contractors if the workplace produces more than 5kg of food waste per week.</p> <p>That waste will still need to be separated at the point it is eventually presented for collection.</p>
<p>Bins</p>	
<p>Containers are expensive to source. Is Welsh Government providing any support for the upfront cost to aid segregation?</p>	<p>There is no financial support to assist organisations in meeting the requirements under the new regulations.</p> <p>Waste collectors will provide external bins for your recycling and waste.</p>
<p>Will bins be provided by our local authority, or will we need to purchase them ourselves?</p>	
<p>How and when are hospitality businesses going to be provided with bins that allow separation? Are businesses expected to source these themselves or will there be a distribution?</p>	
<p>Will small caddies be provided for free to store recycling before transferring them to larger skips?</p>	
<p>Is there any information about bins being provided for businesses?</p>	
<p>Communications</p>	
<p>Are you able to share any case studies for food-on-the-go businesses?</p>	<p>We will be producing case studies presenting examples of how different sectors have implemented the new regulations.</p> <p>Welsh Government also has several case studies on its website.</p>

Are posters and labelling design files fully editable?	<p>Whilst the material lists are fixed, you may add your logo to the bottom banner of the template posters.</p> <p>If you're unable to make changes to the templates that you feel are needed, please contact us to find out how we can help.</p>
Can you please share the link to the posters?	<p>You may access the posters, along with guidance and a resource pack, here:</p> <p>https://businessofrecycling.wrapcymru.org.uk/resources</p>
Contamination	
How should we deal with cardboard with traces of food on it? Do we put these in the bin for non-recyclable waste?	Contaminated cardboard and paper should be put in the bin for non-recyclable waste.
Do we need to clean food and drink containers before they're collected to be recycled?	The Code of Practice provides advice on contaminated packaging. Your waste collector can also advise you on this.
Should we put cardboard items like pizza boxes that have food waste on them with cardboard or should they be put in the bin for non-recyclable waste?	Paragraph 7.7 and 7.37 of the Code of Practice has more information on reducing contamination.
Cost	
Is there likely to be a financial cost to businesses in achieving compliance with the new regulations?	<p>There is no financial support for obligated businesses to comply with the new legislative requirements.</p> <p>Businesses should work with their waste collector to set up the most appropriate collections for their space and quantities of waste.</p> <p>These regulations will support workplaces over time to move away from a situation where the disposal of waste is a significant cost, to one where that waste material is instead effectively captured and returned into our economy as important commodities.</p>
Is there any financial support for businesses to enable them to implement this legislation? Most businesses don't have the space to be able to store waste separately, so they will need to purchase storage facilities and possibly request more frequent collections.	
If Natural Resources Wales (NRW) is enforcing the new legislation, they should provide the bins to businesses or at least the local authorities. I work for a charity/hospitality organisation and buying new bins to adhere with the legislation is going to be costly. Will there be any sort of grant to apply for to help with this cost?	
Cups	
Can you provide some clarity on the disposal of coffee cups please? Is this a new waste stream?	Under the new regulations, cups can now be collected alongside metals and plastics as a minimum requirement. Your waste collector may

<p>Will coffee cups / paper cups also be a mandatory waste stream? I've found most waste operators ask that these are single-stream collected, but the guidance indicates they may be added to metals, plastics and cartons?</p>	<p>request them to be collected separately for ease of processing the material. Under new UK-wide regulations, a cup takeback scheme is due to start in 2025.</p>
<p>The National Cup Recycling Scheme will help with recycling your disposable cups.</p>	<p>The requirements of the cup takeback scheme will not be in conflict with the new regulations in Wales, as a separate bin for cups (as per the takeback scheme) will also comply with the new workplace separation requirements for Wales.</p>
<p>Please refer attendees to the National Cup Recycling Scheme for further advice and information about cup recycling.</p>	<p>Click here for more information: New drinks container return scheme for 2025 will help Wales improve world-leading recycling rates GOV.WALES</p>
<p>How do businesses comply with mandatory cup takeback scheme if they can be put in with cartons in Wales? Will we still need to source and install separate bins for coffee cups in 2025?</p>	<p>Click here for more information: New drinks container return scheme for 2025 will help Wales improve world-leading recycling rates GOV.WALES</p>
Enforcement & implementation	
<p>Is there a lead or contact within NRW that LAs can contact about guidance/enforcement advice, etc?</p>	<p>Emma Killian Emma.Killian@cyfoethnaturiolcymru.gov.uk And general enquiries to diwygiogwastraff@cyfoethnaturiolcymru.gov.uk</p>
<p>If bins are contaminated, they won't be collected. Therefore, the waste collector become the enforcer and the liability falls on me as the business owner, which I don't think is fair.</p>	<p>There will need to be a conversation between the waste producer and collector to agree acceptable levels of contamination and ways of ensuring contamination is limited.</p>
<p>Will NRW be visiting premises?</p>	<p>Yes, NRW will eventually visit premises that must comply with the new regulations.</p>
<p>If my hotel guests do not recycle correctly, who will pay the fine? If this is me as the business owner, is this fair?</p>	<p>You will need to ensure you have taken all responsible steps to implement the required changes under the new regulations. NRW will be offering support and guidance initially to help businesses.</p>
<p>Do we know what the fines are for any non-conformance? For example, what would the fine be for someone putting a banana skin in a metal can or plastic bag that would contaminate that waste stream?</p>	<p>Please refer to paragraphs 7.12 and 7.13 of the Code of Practice for details on responsibility.</p>
<p>The timeline to buy bins and set up new waste collection services are challenging for April 2024. Is there any consideration / flexibility to implement the changes to meet the new regulations?</p>	<p>Where non-compliance occurs, NRW may provide advice and guidance as a first response where appropriate. However, for more serious incidents or persistent non-compliance, NRW has powers to take a firmer approach where necessary, including both civil sanctions (fixed and variable monetary penalties) and criminal proceedings. The fixed monetary penalties will be either £300 or £500 depending on the breach.</p>
<p>As a small business, can one obtain a waste licence from NRW and transport</p>	<p>Yes, this is possible.</p>

our own waste to a commercial collection provider?	For more information about registering as a waste carrier, click here: Natural Resources Wales / Register or renew as a waste carrier, broker or dealer
Who is enforcing this legislation?	Natural Resources Wales is the regulatory body for the separation requirements and disposal bans, and the local authority is regulating the ban on disposal to sewers.
Food waste	
Can you explain the 5kg food waste limit again?	Any non-domestic premises producing 5 kilogrammes or more of food waste in any week (as a consecutive seven-day period) must separate this from all other waste streams and present it for separate collection to be recycled.
If we produce more than 5kg of food waste in a single seven-day period, is one collection a week okay, or do we need to arrange an extra collection each week?	Please refer to paragraph 7.24 of the Code of Practice for more details.
Do we need food waste bins on golf courses? We have three courses and are likely to produce less than the 5kg threshold. If we need to provide food waste bins on courses, this will lead to additional costs and potentially increase vermin activity.	If you currently have bins on the golf course, they will need to be changed to collect the materials separately, including food waste.
Can one 'hot compost' our own garden waste to reduce the volume of waste to be collected?	Technologies are available to 'hot compost', but you would need to carry out your own market research.
I usually compost coffee grounds and teabags. Is it okay to give away coffee grounds to anyone who wants them?	If the coffee grounds being given away as a byproduct and has never been discarded or entered the waste chain then yes that would be OK. You may be able to compost or anaerobically digest your own food waste on your premises, provided you meet the requirements of the Environmental Permitting (England and Wales) Regulations 2016 and any relevant exemptions, and the requirements of the Animal By-Products (Enforcement) (Wales) Regulations 2014 and Regulation (EC) No 1069/2009 , and any other relevant regulations.
There is a ban on all food waste going to sewers. Would this include liquids such as soup, milk, etc.?	This will depend on the amount of liquid waste you produce. Please check with Dŵr Cymru Welsh Water or Hafren Dyfrdwy as you might need to source a 'trade effluent order'. Please be mindful of the

	<p>ban on food waste to sewer and its definition of liquid foods, which for this purpose doesn't include "drinks".</p> <p>See section 4.13 of the Code of Practice for further information on the definitions.</p>
Materials	
With regards to dog walker businesses and using bins for dog waste, would we be expected to sort through that waste?	No.
Which waste stream is most appropriate for wooden stirrers / knives / forks / spoons?	This depends on your contractor. AD plants would not want this being put through the AD process.
Should used paper napkins be put in the container for cardboard and paper, or in the bin for non-recyclable waste?	Contaminated cardboard and paper should be put in the bin for non-recyclable waste. Please refer to Annex 3 of the Code of Practice for the full list of materials and how they should be disposed.
We currently have fat and oil collections in place, but also fat interceptors with breakdown solutions. Is this still legal?	<p>The code of practice says:</p> <p>7.34 The installation of grease traps may help prevent the accidental discharge of grease and similar food waste into the sewer. Section 111 of the Water Industry Act 1991 makes it illegal to permit any matter, which may interfere with the free flow of the contents of the sewer or drain or to affect prejudicially the treatment and disposal of its contents, to pass down any drain or sewer connecting to a public sewer. This could include fats, oils and grease.</p> <p>Having those in place is legal.</p>
What's the point in paper straws and cardboard packaging, if they can't be recycled and should be put in the bin for non-recyclable waste?	Only clean and dry cardboard should be put in your bin for cardboard and paper to be recycled. Paper straws could be recycled and have replaced single use plastic straws.
There seems to be some confusion over blue roll. Should this be recycled with paper or put in the bin for non-recyclable waste? We are dealing with around 10 different waste collectors across Wales that are all telling us different ways to collect this item.	The Code of Practice, Annex 3, states that paper towels are not included in the list of paper to be recycled.
Does 'unsold textiles' include used textiles such as old uniforms?	No, this point is covered in the paragraph 4.15 of the Code of Practice. "Unsold" means an unused consumer product, in a factory, retail premises, wholesaler, warehouse or other premises, that

	has not been sold to a consumer or has been sold and returned by a consumer.
Obligated premises	
Can a charity, for example a community centre that hires out the premises, put the responsibility for recycling on the people hiring the premises?	Section 5 of the Code of Practice can help occupiers of non-domestic premises determine if they are covered by the regulations.
Does the question above also apply to self-catering let accommodation please?	
Will non-recyclable waste no longer be required if everything is to be recycled?	There will be materials not included in the specified material list that will still need to be put in the bin for non-recyclable waste.
Separation	
In hotels, are we expected to go through the bins and separate the waste considering they will possibly contain bodily fluids amongst this waste?	<p>You will not be required to sort through bags of recyclables to ensure they are free of contamination.</p> <p>You will need to ensure that the recycling bins are clearly labelled, the recycling system in place is communicated to staff and visitors and sufficient containers are provided for your staff and guests to use it correctly.</p> <p>You are advised to monitor the effectiveness of your recycling system and make any change needed to ensure it is working well.</p> <p>The Code of Practice (paragraph 7.37) contains more detail on steps you are advised to take in relation to contamination.</p> <p>Hotels are advised to have a sign on the desk in each visitor's room asking them to place any recyclable items separately, alongside the bin for non-recyclable waste. This will reduce the mixing of waste and recyclables from the outset and making it easier for the hotel to present separated waste streams for collection. These items are then collected and kept separate by the cleaning staff.</p> <p>Having bins for recycling in communal areas that can be accessed by guests would provide a solution, rather than having a number of bins in each room.</p>
If we provide teabags for guests in their bedrooms, do we have to provide food waste bins for them? This could be a pest / health and safety issue.	
I have a hotel. How can I be liable for the behaviour of guests?	
I have a hotel and I am the only member of staff. Does Welsh Government consider the health risk to me as I try to ensure waste is properly sorted?	
You mentioned we are not expected to go through bedroom bins in hotels, etc., but if there are recyclable items in those bins and they go into bins for non-recyclable waste, could this lead to fine? Obviously, if it is easy to go through the bins then this will be done, but some customers will put condoms, etc. into the bins and I am thinking of my staff's health.	
If I am injured or contract a bacterial infection from trying to correctly sort trash, who is liable for my health?	
Four bins in a guest room is not very practical. Would putting recycling stations in communal areas, such as lift lobbies be sufficient? Potentially with messaging in guest rooms encouraging guests to take their recyclable items from their room to these stations?	



If you've any further questions, please send an email to WalesRecycles@wrap.org.uk or CymruYnAilgylchu@wrap.org.uk.