

Business of Recycling Wales- Webinars

Retail Sector 6 February 2024

Questions & Answers

This document presents WRAP Cymru’s answers to the questions delegates asked during the Retail Sector webinar. We have grouped questions by theme, sometimes there is a single answer for multiple questions.

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

[The Business of Recycling Wales Guidance for all workplaces \(wrapcymru.org.uk\)](#)

Question	Answer
When will the sector-specific guides be live on the Wrap Cymru website please?	The seven sector guides are available on the Business of Recycling Wales site - The Business of Recycling Wales Guidance for all workplaces (wrapcymru.org.uk)
Bins	
Will councils be updating external bins they own (specifically situated outside retail stores) to meet these new regulations?	<p>Litter bins The workplace recycling regulations do not apply to Local Authority litter bins. However, for the sake of a consistent approach and for good practice, it is recommended that separate litter bins for recyclable items are provided at any locations where litter bins are located so that Local Authorities can, wherever possible, arrange for litter to be recycled.</p> <p>Commercial waste bins If the bins are for commercial collections from workplaces then yes - they will be changed to comply with the new regulations along with the separate collection requirements</p>
We have bins in our car parks and at petrol stations. Are we expected to have recycling bins at all these points?	All workplaces are required to present the listed materials separately for recycling. It is up to each workplace to decide how they can most effectively separate these materials. However, having recycling bins next to litter bins can be a good way to do this. Just collecting all waste in a residual litter bin and making no attempt to separate the required materials for recycling would not be in line with the new regulations
What if our front-of-house footprint is too small to house as many bins as are required?	It will be up to each workplace to work out the best configuration of bins depending on the amount and type of materials that are produced and the space available.

Question	Answer
	<p>For constrained spaces, there are options to have stacking bins that do not take up much more space than a single bin.</p> <p>The Regs do not set out requirements for bin configurations - the requirement is only to separate at presentation point (refer to paragraphs 7.14 - 7.16 in the Code of Practice)</p>
Communications	
<p>What plans are being taken to inform customers of this change? We can place the bins but if they don't use or know how to use</p>	<p>The Welsh Government is running a media-wide awareness raising campaign including radio adverts. Workplaces will also be required to provide information to visitors once the new system is in place.</p>
<p>The PowerPoint template on the site is only in Welsh, could you add an English version please?</p>	<p>The text on the PowerPoint is placeholder text that is in Latin. This is done so that nothing is inadvertently left in when being used.</p>
<p>Will you be sharing an FAQs document?</p>	<p>Once these webinars, we will look to compile a list of FAQs and share them on the website. are complete We are responding to all of the questions from the webinars on the site also. If you have further questions, please do email walesrecycles@wrap.org.uk</p>
<p>As there is no defined tolerance level for contamination what happens if an enforcement officer deems the contamination too high but the waste collector does not?</p>	<p>Our advice is to talk to your waste collector about acceptable levels of contamination (if any). If the situation described were to arise (which seems unlikely) and a workplace could demonstrate that it was taking reasonable measures to control contaminations levels, the questions would then be presented to the collector to explain their approach.</p>
<p>Are the fines being enforced associated with whether or not you have the option for segregation, rather than what is in the bin?</p>	<p>The fines are for non-compliance with the regulations, which for a producer would be failing to present the specified wastes separately for collection. The regulators will be looking to see what steps are being taken to comply with the requirements and will provide advice and support to improve compliance in the first instance.</p>
<p>What if the waste is processed in England for Welsh sites?</p>	<p>Refer to Waste Collectors Q&As</p>
Cups	

Question	Answer
If a coffee cup had been used would this go in general waste or one of the recycling streams?	Yes, it must be separated for recycling.
Coffee cups - which ones are suitable for the plastics/cans/cartons stream please?	Paper drinks cups with a low-density polythene or polypropylene plastic layer can be presented in the same stream as metals and plastics. You should check with your waste collector as to how they would like these materials to be collected.
Please can you clarify the guidance on coffee cups? I thought these had to be collected separately?	Any cups made with compostable or biodegradable layers will have to be placed in the general waste bin.
Coffee cups that aren't compostable - should they go in plastic, metal, or cartons if separate bins have been provided for those waste streams?	Waste companies will need to introduce these separation capabilities if they don't already have them.
We have spoken to our waste collectors; they are not aware of a MRF in Wales that can deal with coffee cups	The Workplace Recycling Regulations require cartons and cups to be separated for recycling. They can be separately presented for collection with metal and plastic and cannot be mixed with anything else. However, they can be collected separately, and the Code of Practice makes it clear that a greater degree of separation is permissible.
Will retailers still be obligated under the new mandatory cup take-back regulations coming in 2025 to have to remove cups from the plastic, carton & cup mixed stream in order to keep them separate?	Under new UK wide regulations, a cup take-back scheme is due to begin in 2025. New drinks container return scheme for 2025 will help Wales improve world-leading recycling rates GOV.WALES The requirements of the cup take-back scheme will not be in conflict, as a separate bin for cups (as per the take-back scheme) will also comply with the Workplace separation requirements for Wales.
Customers	
Do these new rules apply to retail customers (visitors)?	It will be up to each workplace to work out the best configuration of bins depending on the amount and type of materials that are produced and the space available.
Do bins need to be on show to customers or can staff take the materials and manage them at the back of the store to help reduce contamination?	However, you will need to demonstrate how you are working to meet the requirements and that you are monitoring the effectiveness of the systems you have implemented.
What are the actual requirements for internal and external customer bins?	
Can the bins be placed after the till point if required? Or do they have to be accessible to customers without walking through the store?	

Question	Answer
<p>Morning. Are retail businesses required to also police any external containers they may have, which are then moved into the main containers ready for collection?</p>	<p>If you currently have bins in customer facing locations then yes, you will now need to either provide separate bins for all specified waste streams or ensure that what is collected is sorted into the specified waste streams prior to collection.</p>
<p>As a business is this just back of house - operational waste and colleague waste or does this apply to customer waste?</p>	
<p>If you have a general waste bin front of house where customers put all waste streams in (card, plastic packaging, paper, cans etc) and you do not offer customers anything else to separate (e.g. leave on table, recycling bins) are you as the business responsible for separating this co-mingled waste for collection?</p>	
<p>How will the waste collectors be regulated to ensure the waste is actually being recycled?</p>	<p>As a waste producer, you are required to produce a waste transfer note. In most cases your waste collector will produce this for you. You should check this carefully to ensure that the description of the waste being collected is accurate. None of the separated materials can be sent by your waste collector to landfill or incineration. You could consider asking your waste collector for regular evidence of the final processing destinations of your segregated materials.</p> <p>You can find out more about your responsibilities as a waste producer here: Natural Resources Wales / Waste duty of care for organisations</p>
<p>Food Waste</p>	
<p>Is the 5kg for food waste based on average annual food waste or if you go over 5kg in any week?</p>	<p>The 5kg food waste weight limit applies to any seven-day period. If you produce 5kg or more of food waste during any seven days, then it must be presented separately for collection. If you do not produce over 5kg per week then this should be monitored to take account of any changes on the premises. As an example, this could be an increase of staffing levels or visitors.</p>
<p>If the retailer currently backhauls food waste to a central location within the region, do we still need food bins on site? As these would probably never be of use</p>	
<p>Should we have recycling bins in kitchen areas?</p>	<p>Yes, if kitchen areas are where packaging material and food waste will be produced then you should have bins there</p>
<p>How would you advise that stores dispose of drinks that go out of date? Can they be</p>	<p>This will depend on the amount. Check with Dwr Cymru or Hafren Dyfrdwy – a trade effluent order may need to be sought.</p>

Question	Answer
disposed down the drain and then the bottle recycled?	Be mindful of the food waste to sewer ban and definition of liquid foods, which for this purpose doesn't include "drink".
Litter bins in public areas	
If retailers have to provide segregated bins in drive-thrus and front-of-house, why are there not segregated bins in public areas which will assist with the education of the public?	With the introduction of this new law there will be more recycling bins in public places and so a more consistent approach to recycling across Wales will be implemented
Re: Bins on Petrol Forecourts - there isn't space for more than one bin in between main pumps. What is the advice?	<p>We advise that you establish what is in the bins currently. If there is material that needs to be separated, then you will need to provide bins for recycling. This could be a split bin or bins provided across the site.</p> <p>Whatever approach taken, workplaces will need to monitor effectiveness and make changes as necessary.</p>
<p>For retailers who have customer-facing bins external to the premises in a car park or a drive-thru where customers may bring in waste not produced on site - is a waste stream expected to be put in place for glass even if no glass is offered as a product from the retailer?</p> <p>Also, how is the retailer expected to police the waste in external bins on retail parks?</p>	
<p>We operate drive thru restaurants. How should we manage front-of-house or car park areas? We aim to provide separate bins in the dining area, but how will the regulations be enforced if customers do not separate the waste correctly?</p>	<p>We advise that you establish what is in the bins currently. If there is a material that needs to be separated, then you will need to work out how best to capture it for separation.</p> <p>Retailers will be expected to make reasonable provision to enable customers to use bins correctly (e.g. location of bins and the aperture shape/type) but will not be expected to hand-sort the contents of each bin.</p> <p>Whatever approach taken, workplaces will need to monitor effectiveness and make changes as necessary.</p>
<p>The code of practice does not fully discuss public general waste - what are the guidelines around this?</p>	<p>The workplace recycling regulations do not apply to Local Authority litter bins. However, for the sake of a consistent approach and for good practice it is recommended that separate litter bins for recyclable items are provided at any locations where litter bins are located. This is so that Local Authorities can, wherever possible, arrange for litter to be recycled.</p>
Materials	

Question	Answer
<p>With regards to glass - is there similar guidance to household waste? i.e. if broken glass is placed in general waste</p>	<p>Yes, for safety reasons</p>
<p>In terms of the cartons, is there a certain plastic code that is accepted with the metals and ones that are not?</p>	<p>The polymer resin codes are listed in the Glossary of the Code of Practice.</p>
<p>Do you have to offer all waste stream bins if you don't get a waste stream i.e. do we need to offer a glass bin if we don't expect to get glass back?</p>	<p>We advise that you establish what is in the bins currently. If there is a material that needs to be separated, then you will need to work out how best to capture it for separation.</p> <p>If there is currently no glass in your bins, then a glass collection would not currently be required. However, if this changes (i.e. you start to sell items in glass or you find glass in your bins) you would need to make provision for glass.</p> <p>Whatever approach taken, workplaces will need to monitor effectiveness and make changes as necessary.</p>
<p>Just to be clear, what is required for second-hand clothing donated with the clothing tags still attached?</p>	<p>This point is covered in code: 4.15 "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. "Unsold" does not include second hand goods. However, where a charity shop or second-hand shop receives a donation of new unused stock that has never been sold to a consumer then those items would be considered to be "unsold". As a result of this, if a shop were to fail to sell such items and decide to dispose of them they would be subject to the separation requirements.</p>
<p>As a charity Retailer, can we get some clarity on how unsold textiles should be processed? While we know unsold textiles should be collected separately, if there is a ban on incineration and landfill what is expected to happen to unsold textiles. For us, we can receive textiles that are unsellable i.e. contaminated with chemicals or damaged.</p>	
<p>Are there minimal volumes of glass waste as we would only have a rarity of broken items</p>	<p>There are no minimum volumes for collection. It may be possible to arrange an ad hoc collection for small quantities of material. Refer to Annex 1 in the Code of Practice for the list of glass that needs to be separated for collection.</p>
<p>Is it all types of plastic i.e. hard and soft? In the same bin?</p>	<p>The full list of types of material to be collected in each material stream are detailed in the annexes of the Code of Practice Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales (gov.wales)</p>

Question	Answer
<p>we work with a waste provider that takes DMR - Dry Mixed Recycling waste from back of house. does this still comply with the law</p>	<p>No, collections of dry mixed recycling will no longer be allowed under the new regulations. The specified materials must be presented to your waste collector sperate from each other and other waste streams</p>
<p>Enzyme digesters</p>	
<p>We collect fats and oils from fryers etc.. for bio fuel but we have enzymes to break down any fats which may end up down the drain. Are these still allowed?</p>	<p>The code of practice says:</p> <p>Food waste disposal equipment (for example macerators) or other forms of food waste treatment equipment (for example dewatering or enzyme digesters) cannot be used in non-domestic premises to discharge food waste or liquid derived from food waste to a drain or sewer.</p> <p>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>Enzyme digesters are not allowed. They cannot be used in non-domestic premises to discharge food waste (or liquid derived from food waste) to a drain or sewer).</p>
<p>Where enzyme digesters are used, is there a list of products i.e. (Enzyme Biological Cleaner Degreaser) that can be used or is there just a total ban on these systems?</p>	
<p>Regulation</p>	
<p>What's the difference between the legislation currently in Scotland and this regulation?</p>	<p>The two sets of legislation are similar but have some key differences. For example, in Wales, the requirements for food waste are applicable to all businesses and the recycling separation is differently defined.</p> <p>More details on the Scottish regulations are here: Waste (Scotland) Regulations Zero Waste Scotland</p>
<p>Separation</p>	
<p>Separation of recycling has implications with health regarding body fluids on tissues etc - is this what the councils will be doing with public bins, hand sorting it?</p>	<p>The workplace recycling regulations do not apply to Local Authority litter bins.</p>

Question	Answer
<p>If you manage your own waste e.g. internal recycling centre can you mix recycling as you know it will be separate at the later stages of the process? e.g. mixing all the recycling in one bag and having general waste in another.</p>	<p>For litter bins, all workplaces must present recyclables in litter bins separately on collection. They have the option of having separate recycling bins, or sorting out the litter bin wastes prior to collection.</p> <p>The only litter excluded from the Regulations is the litter that Local Authorities are responsible for as highways authorities and as principal litter authorities. However, for the sake of a consistent approach and good practice it is recommended that separate litter bins for recyclable items are provided at any locations where litter bins are located. This means that Local Authorities can, wherever possible, arrange for litter to be recycled.</p>
<p>Sites in managed centres</p>	
<p>If you are a retailer in a hospital and you segregate your waste, but it is the hospital that collects your waste, will the hospital still have to ensure the collected waste maintains segregated - taking into account their two year extension? Often hospitals will not allow you to arrange for collection by an external collector due to infection control etc.</p>	<p>Waste produced by any third-party undertakings on hospital premises, for example newsagents or cafes or coffee shop franchises, are covered by the separation requirements that take effect from 6 April 2024. Please refer to paragraph 5.13 in the Code of Practice.</p>
<p>I have a cafe in a shopping centre and currently get rid of my own food waste. Should the centre get rid of my food waste or should I continue to do this?</p>	<p>You will need to agree with the hospital the best approach to ensure that you are compliant with the new laws.</p>
<p>With regards to shopping centres, if the occupier has not used the facility provided, who is responsible? if items are put into large general waste and possibly not seen at source without hand sorting</p>	<p>As the occupier of a premises, it is your responsibility to arrange for a suitable collection for your waste. It will depend on your individual business circumstances whether this is done through the shopping centre or whether you arrange a collection with a waste collector directly</p>
<p>We are working hard to deliver but it is clear from critical paths for buying bins and changing services means 6th April is not deliverable</p>	<p>As the occupier of a premises, it is your responsibility to arrange for a suitable collection for your waste. It will depend on</p>

Question	Answer
<p>Given the lead time for ordering recycling bins has lapsed (12 -14 weeks). Will we be penalised from the 6th April if we have units on order?</p>	<p>your individual business circumstances whether this is done through the shopping centre or whether you arrange a collection with a waste collector directly.</p> <p>Natural Resources Wales (NRW - the environmental regulator in Wales) will be taking a proportionate approach to the enforcement of the law. They will be looking to provide advice and guidance initially. They will be looking to see that plans are in place; bins are on order and that workplaces are taking appropriate steps to comply with the new regulations.</p>
<p>As the details have only recently been published, we are now rushing to get new customer recycling units into our restaurants that meet the guidance, but this will take some time to build and install. Will there be any leeway on timings?</p>	<p>For more serious incidents or persistent non-compliance a firmer approach will be taken.</p>
<p>We have asked questions of our Local Authority in Wales they have no insight into this change and cannot advise. This is a concern as time is ticking</p>	<p>All Local Authorities in Wales are aware of the changes in the regulations. We would suggest that you contact them again and ask for the trade waste team who should be able to tell you their plans for the new service.</p>
<p>Communications</p>	
<p>Will it be mandatory to use the colour/logo schemes for the different waste streams provided by WRAP? This could help create a consistency between internal and external bins as well as household and business.</p> <p>Follow up question: Will EN, SC and NI use the same colour/icon schemes to have this consistent across the UK?</p>	<p>It will not be mandatory but by using the WRAP logos and colour scheme you will be using the UK-wide recognised brand which will reinforce messages and provide a consistent recycling scheme across Wales and the UK</p>

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