

## Business of Recycling Wales- Webinars

### Leisure and Entertainment Sector 31 January 2024

#### Questions & Answers

This document presents WRAP Cymru’s answers to the questions delegates asked during the Leisure & Entertainment 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
<b>Mixed recycling</b>	
How would waste on a caravan park be managed if all waste from the workplace and individual caravans is collected together?	The occupiers of individual caravans that present their waste directly for collection from their caravan by an authorised waste collector do not fall within the scope of the Regulations. However, where caravan parks or sites have communal waste collection arrangements, the waste must be separated in accordance with the Regulations. (See section 5 of the Code of Practice for full detail).
Is collecting mixed recycling for sorting later no longer acceptable?	Yes, mixed (co-mingled) recycling is no longer permitted under the new laws. Section 3 of the code explains the rationale for this. All specified materials must be presented to the waste collector for recycling in the streams defined in the Regulations. This includes: <ul style="list-style-type: none"> <li>• food</li> <li>• paper and card</li> <li>• plastic, metals and cartons</li> <li>• glass</li> </ul>
Won't more collections result in an increase of emissions from waste collector as they have to visit the caravan park more often?	Increasing the number of material streams collected does not have to mean an increase in vehicles. One vehicle with separate compartments may collect the material or collections may be less frequent. This is dependent on need. Remember that the total amount of waste to be collected will not be increasing.  The increased environmental benefits of higher quality recycling have been shown to outweigh any additional emissions relating to transport. (For full technical detail you can read the <a href="#">Regulatory Impact Assessment</a> ).

Question	Answer
<p>What is the advantage of separating at the point of collection compared with sorting after collection of mixed recycling?</p> <p>With the extra production of plastic bins, extra hours on the road for bin wagons and the fact that our existing refuse collector recycles 90% at the moment negates any reduction in the carbon footprint.</p>	<p>The Regulations set out the separation requirements in Wales with the aim of ensuring that waste is managed in a manner that promotes high-quality recycling. Section 3 of the Code explains this in more detail.</p> <p>The supply of high-quality secondary materials that is derived from the recycling of waste can provide a valuable, resilient and cost-effective supply of raw materials to Welsh industries. This is more likely to result in “closed-loop” recycling that generally has better environmental outcomes than “open-loop” recycling.</p>
<p>How can a static caravan site implement this? Space is a premium for within the units. Our refuse collection service provider does recycle, is this possible after the April deadline or will then need items separated?</p>	<p>If the materials are collected communally from a caravan site, all specified materials must be presented to the waste collector separately for recycling. It cannot be presented mixed to be sorted later. The method used to organise this within the units would need to be arranged on a case-by-case basis. It is possible to find bins with different compartments or that stack to minimise their footprint.</p>
<b>Material streams</b>	
<p>Do you have any suggestions for educating visitors/staff regarding the confusing area of food cartons/drinks, some of which may or may not be recyclable?</p>	<p>There are posters available to download from the Business of Recycling Wales site that lists clearly which items are recyclable. We would suggest including recycling information on materials you provide for visitors and staff.</p>
<p>We have a maintenance skip which collects gardening/ wood plastic mixed of waste. Does this need to be separate?</p>	<p>All household-like material streams listed need to be separated for collection, but this does not include construction or garden waste. Annexes 1-6 of the Code sets out what materials and items need to be separated out for recycling.</p>
<p>Does paper and card have to be separated?</p>	<p>No. Under the Regulations these materials can be collected together. However, you should check with your waste collector regarding how they would like them presented.</p>
<p>Is the recycling to go directly into the bin? I.e. Not to use plastic bags in the bin, which can be lifted with waste in?</p>	<p>Bags can be used in bins to separately collect materials.</p>
<p>Are we still permitted to have a non-recyclable general waste bin?</p>	<p>Yes, this is acceptable for materials that cannot be recycled.</p>
<p>We're going to need to introduce some new split bins into our customer facing areas in our complex buildings (i.e. reception, restaurant, arcades etc) - is it a rule that every general waste bin needs to be replaced by a split bin, or is it ok to still have general waste bins but on them, to signpost customers to split bins (i.e. not to replace on a 1 for 1 basis)</p>	<p>It is good practice to always place a general waste bin alongside any recycling bin to reduce contamination of the recycling stream with non-recyclable waste. You will need to monitor your systems to ensure that they are effective in enabling recycling.</p> <p>The Regs do not set out requirements for bin configurations - the requirement is only to separate at</p>

Question	Answer
	presentation point (refer to paragraphs 7.14 - 7.16 in the Code of Practice)
Do lids have to be removed from bottles, tins, and containers and do these items need to be "rinsed out" before putting in the bin?	Lids can be kept on. It is preferable for items to be rinsed out where practical.
Although the cardboard from coffee sachets can be recycled, the sachets say that they can't. Will this go in general waste?	Items that cannot be recycled will need to be placed in general waste.
Where does dog waste go?	In the non-recyclable bin
What about batteries - do they get binned separately?	Batteries are not covered by the Workplace Recycling Regulations. However, they are covered by some existing regulations. Any distributors or retailers that sell or supply more than 32kg of batteries a year must provide a take back service. You can read the full details here: <a href="http://www.gov.uk">Regulations: waste batteries - GOV.UK (www.gov.uk)</a>
<b>Food waste</b>	
What happens to food waste less than 5KG? If we produce less than 5kg of food waste, how do we dispose of it?	Businesses that produce less than 5kg of food can still opt to have a food waste collection, but it is not a requirement. If you don't have a food waste collection then food should go in the non-recyclables bin.
I do not generate any food waste as a business so what responsibility do I have in terms of managing food waste	If your customers dispose of food waste at your business, then this needs to be included in the 5kg estimation.
I have a touring camp site. I do not have a cafe or shop.	If you dispose of visitors' or customers' waste - e.g. by providing bins on a campsite, then the regulations apply.
If you do not produce food waste e.g. via a cafe but your regular customers (caravan owners) prep meals and produce food waste, do you need to collect that waste separately?	Yes, if you dispose of caravan owners' waste - e.g. by providing communal bins on site, then the regulations apply and food waste (if over 5kg per 7 days) will need to be collected separately.
We run a Bunk House and Campsite but NO staff on site. Users look after & cater for themselves. How can we control what they do? Food waste would generally be less than 5kg so what do we/they do with it?	If you provide a waste collection for your customers, the regulations apply whether or not you have staff on site. We would recommend including easily accessible information on how to use the recycling system you establish. You will need to monitor this to ensure that it is effective.  If food waste is under 5kg per 7 days, then it can go in non-recyclable waste (or you can choose to have a separate collection).
We are a large country park with a number of satellite offices around the park. Do the smaller offices also need to recycle food?	You will need to establish where waste arises on your site. If there is food waste created in the satellite offices on the single site then it will need to be separated for separate presentation to your waste collector.
Has food got to be put in the bin without a bag? If so, this will attract vermin to the site as we are in the countryside. Is it not a health and safety issue as we surely we cannot be expected to trawl through the bins	Bags and bin liners can be used in food waste bins. Check with your waste collector for guidance on what bags to use, for example, compostable liners.

Question	Answer
Can the food waste be in recycling bags placed in the main container as in current domestic waste, or needs to be tipped in "raw"? The smell in summer will be horrendous!	There is not an expectation to sort through bins but to provide a system which is effective in enabling users to recycle.
Can we compost food waste?	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 <a href="#">Animal By-Products (Enforcement) (Wales) Regulations 2014</a> and Regulation (EC) No 1069/2009, and any other relevant regulations.
Will caravan park owners be expected to provide food waste caddies to all caravans/lodges/chalets on site?	How a premise collects the specified materials is down to the owners of the site. There is no set way of how to collect the materials. 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).
<b>Contamination &amp; enforcement</b>	
As a campsite how can we be held responsible for what guests put in the waste bins? We already recycle cardboard, glass and plastic but constantly find the wrong items in the wrong bins!	<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>You are advised to speak to your waste collector about contamination tolerance and the procedures they have for dealing with contamination.</p> <p>The <a href="#">Code of Practice</a> (paragraph 7.37) contains more detail on steps you are advised to take in relation to contamination.</p>
How to deal with contamination. Is it a criminal offence to collect it if guests inadvertently mix streams	
Will caravan/camping site owners be held responsible for the actions of their customers who in many ways treat their caravan/unit as they might their own home?	
What happens if your clients don't recycle as required?	
Campsites: Are we expected to go through each guest's bin bags to check?	
On a caravan park, how do we control what individual caravan owners put in general waste?	
We have a small caravan park, majority owners and some letting. Whilst we can enforce staff we can ONLY encourage/educate customers and have no means of enforcing this with our customers. How can we enforce?	
An example for it to work for a simple takeaway could require up to 5 recycling bins customers would have to have in each caravan which is unlikely to happen. Is this not an ill thought-out	

Question	Answer
<p>legislation to apply to caravan parks? We can't enforce and impractical for individuals to manage.</p>	
<p>I am extremely concerned about cross contamination which will be outside my control. I can make sure all my bins are well labelled but I cannot guarantee that my clients follow the guidance so what do I do about it? I cannot ask my employees to sort the rubbish further due to the H&amp;S risk.</p>	
<p>What will happen if someone puts a half-eaten kebab in the glass recycling bin?</p>	
<p>Will my business be penalised if customers on a large park use the wrong bins and "contaminate" any of the streams. I don't feel able to ask my staff to then deal with this by re-sorting the waste themselves. I have a duty of care to my own staff in this scenario.</p>	
<p><b>Contracts</b></p>	
<p>If we have a two-year contract with our waste supplier and we only have a few months to implement this fundamental change this will cause some real legal issues.</p>	<p>All waste collectors are required to follow the new regulations and so if they do not currently separate materials for recycling in line with the regulations, they will need to amend their service. We suggest that you discuss this with your waste contractor.</p>
<p>If we're in a contract with a refuse company, as these changes are being forced on us by Government, will this negate an existing contract and allow us to change providers.</p>	
<p>Do you think that the timeframe given to implement this legislation is adequate? Private waste collectors will need to fundamentally change infrastructure and equipment, vehicles etc..</p>	<p>WG has consulted extensively on these reforms in 2013-14 and again in 2019, and 2022 and throughout this period has engaged extensively and regularly with the waste sector and wider stakeholders to ensure continued awareness of the upcoming changes.</p>
<p><b>Collections</b></p>	
<p>My council has one of the highest recycling rates in Wales and does not separate at the point of collection. So why is Welsh Government specifying that recycling must be separated prior to collection for businesses?</p>	<p>Collecting material separately will ensure increased quality of material collected for recycling with minimal quantities of contaminated material sent for disposal. The majority of councils in Wales (16 out of 22) collect material separated in a similar way to that required by the legislation and several others have plans to change to this approach in the near future.</p>

Question	Answer
<p>Currently, our council do not collect waste at the point of collection in the same way as you have described they must be separated. For instance, in this area, they collect paper and card together, but they collect metal and glass together then plastic separately (that does not include tetra packs or coffee cups). Will all councils now be operating the same collections?</p>	<p>All waste collectors, council and private sector, will be legally required to comply with the new Workplace Recycling Regs and provide a separate collection for the specified materials. A mixed collection of dry recyclables from workplaces will no longer be allowed. They will not be able to collect all materials mixed in the back of one lorry.</p>
<p>We currently separate our main park waste bins (for all customers on our park) into cardboard/cans, glass and general waste. Do we now need to introduce a food waste bin? We do not have any type of food premise on our park. Also, this all currently gets taken away in one lorry and mixed together anyway so seems a little counterproductive!</p>	<p>All waste collectors, council and private sector, will be legally required to comply with the new Workplace Recycling Regs and provide a separate collection for the specified materials.  If you present more than 5kg of food waste per 7 days (whether or not you have a food outlet on site) a food waste collection is required.  A mixed collection of dry recyclables from workplaces will no longer be allowed. They will not be able to collect all materials mixed in the back of one lorry. Collectors may chose to use lorries with multiple compartments</p>
<p>We only have 2 months - when are the separate stream structures going to be introduced by individual councils?</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>Waste contractors by and large make one trip to holiday parks/sites a week and collect all the waste and recycling at once - sorting much of it back at their depot. I am concerned this will create many more journeys by the lorries to and from business sites.</p>	<p>To avoid multiple trips, waste collectors may choose to use multi compartment vehicles to collect the several different materials in one trip.</p>
<p><b>Other</b></p>	
<p>As a caravan park I would be interested in the nature and size of the fines. It would be nice to be aware how big they could be so we could encourage compliance.</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>If we need to provide online maps can WG allow free usage of recycling maps</p>	<p>There is no requirement to provide online maps, it was a suggestion to assist site users in locating recycling facilities.</p>
<p>How long do you anticipate these new regulations to remain in place unchanged? Do you anticipate more specific sorting conditions to be implemented in the future? What can we do to future-proof our new waste place</p>	<p>There are further phases of the law planned with WG signalling that they plan to phase in a requirement to separate out all small waste electrical and electronic items and all textiles up to 2 and 3 years after the original coming</p>



Question	Answer
	into force date. See <a href="#">Written Statement: Workplace Recycling Regulations Update (20 July 2023)   GOV.WALES</a>
My local church has a public car park. Rubbish bins are located and clearly, we have no control over what is put in them. Does this waste have to then be separated?	<b>Litter bins</b> The workplace recycling regulations do not apply to local authority litter bins. 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 so that Local Authorities can, wherever possible, arrange for litter to be recycled.
Do general litter bins on our site now need replacing to recycling bins? I am talking about small litter bins that you see in your local towns, parks etc.	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.
We are a large landowner and want to check what the expectation is around waste/litter segregation in large outdoor and open access areas of Wales which is hard to manage.	There is no financial support available.  There are other forms of support available to implement the changes (variety of guidance, tools, such as sector-specific guidance and best practice case studies, downloadable signage, communication assets). While businesses may face initial investment costs, it is anticipated that the Regulations will support the majority of workplaces over time to divert waste from the residual stream and reduce the amount of waste they produce, leading to reduced waste management costs overall. See case study examples featured, Canton Food Market and Sinclair Motors <a href="#">Workplace Recycling Case Study Films - YouTube</a>
With council tax rises, business rate rises and tax on holiday lets, will there be any financial support available for business to accommodate these changes or is this another cost we need to absorb.	
<b>Communications</b>	
Our waste collector is not providing different coloured bins so are signs and stickers for appropriate bins sufficient?	Yes, please check the resources available <a href="#">Workplace Recycling -Webinars (wrapcymru.org.uk)</a> for free downloadable posters
Will all local authorities merge to have the same colour recycling bins?	Many Welsh LAs already use the national Wales Recycles colours and recycling symbols but there is no requirement for them to do so.
Would WRAP encourage having each of the different recycling streams for each recycling stream be available within all individual self-catered accommodation units?	This would be best practice but it the responsibility of the business owner to decide how best to collect the specified material streams.



If you've any further questions please send an email to [WalesRecycles@wrap.org.uk](mailto:WalesRecycles@wrap.org.uk) or [CymruYnAilgylchu@wrap.org.uk](mailto:CymruYnAilgylchu@wrap.org.uk).