

Workplace Recycling Law

A guide for caravan parks and campsites

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Contents

[Why you need to recycle?](#)

[Why you need to recycle \(page 2\)?](#)

[How to better understand your waste and recycling](#)

[Preventing waste in the first place](#)

[How to comply with the new recycling law](#)

[How to arrange a new recycling service](#)

[Space for bins?](#)

[Bin location & storage](#)

[Engaging with visitors and guests](#)

[Engaging with staff](#)

[Managing the system](#)

[Compliance](#)

[Additional resources and information](#)

Why you need to recycle?

This guide, prepared by WRAP Cymru, should be read alongside the [Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales](#) ([gov.wales/workplacerecycling](#)). This guide is aimed at caravan parks and campsites but may also be useful for those managing other forms of holiday accommodation including holiday parks and resorts.

It is now law ([legislation.gov.uk](#)) for all workplaces to separate the following materials for recycling and arrange for the waste to be collected separately from other waste.

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.

All sizes of site are included, regardless of onsite services provided. If you dispose of visitors' or customers' waste - e.g. by providing bins on a caravan park or campsite, the regulations apply to this waste too.

... and what to recycle?

- Paper and card;
- Glass;
- Metal, plastic, and cartons and other similar packaging (for example coffee cups);
- Food – all premises that produce 5kg or more of food waste in seven consecutive days;
- Unsold small waste electrical and electronic equipment (sWEEE); and
- Unsold textiles.

An 'unsold item' refers to an item that has not been sold to a consumer or has been sold to, and returned by, a consumer.

The 5kg food waste weight limit applies to any seven-day period. If you produce 5kg or more of food waste during a continuous seven-day period, then it must be separated for collection. If you do not produce over 5kg of food waste during a continuous seven-day period this should be monitored for increase, for example more staff, residents or visitors.

Why you need to recycle?

This law only applies to **household like** waste produced by workplaces, that is waste that is usually found at home and collected from the kerbside.

A full list of recyclable materials that should be separated for recycling is here: [The Separate Collection of Waste Materials for Recycling: Code of Practice](https://gov.wales/workplacerecycling) (gov.wales/workplacerecycling).

As a waste producer, you must produce a waste transfer note. In most cases, your waste collector will produce this for you. You should check the waste transfer note carefully to ensure that the description of the waste being collected is accurate. None of the waste materials separated for recycling can be sent by your waste collector to landfill or incineration. You could consider asking your waste collector for regular evidence of where your waste and recycling is being taken.

While it will not be illegal for you to have a macerator, de-waterer, or other similar food waste disposal technology, it will be illegal to use them to send food waste into sewers.

How to better understand your waste and recycling

To understand the different types of waste your caravan park or campsite produces, undertake a waste audit by walking through the different areas within your site. This may include caravan and camping areas, guest facilities such as washing up areas and shower blocks, offices, on-site facilities such as cafes, shops, or lounge areas, to examine the contents of general waste bins, and to highlight any waste reduction or recycling efforts that are already in place. In addition, think about the people who will be using your facilities and the types of waste that they may produce.

Within your site, the areas most likely to generate waste will include:

- Guest and holiday accommodation – food (spoilage, preparation, and plate waste), packaging waste such as drinks cans, plastic and glass bottles, drinks cartons, cardboard, and paper.
- Kitchens and any on-site cafés:
 - Food preparation areas - food (spoilage and preparation waste), packaging such as metal, glass, cardboard, plastic films and wrapping.
 - Food consumption areas - food (plate waste), packaging waste such as drinks cans, plastic and glass bottles, drinks cartons, cardboard, and paper;
- Staff room/mess room/office - paper, food, and packaging materials;
- Public areas such as washing up areas and shower blocks - uneaten food, packaging waste such as drinks cans, plastic and glass bottles, drinks cartons, cardboard, and paper;
- On site facilities such as shops or lounge areas – paper and packaging materials such as cardboard, plastic films and wrapping; and unsold textiles and unsold small electricals.

Depending on the specific nature of your business and the services you provide, you may produce different types of waste, for example, cooking oils and fats, disposable camping gas cylinders or batteries that will require a specialised waste collection service.

Preventing waste in the first place

Reducing or preventing how much waste you produce will help to save money and reduce the size, and potentially the quantity, of bins you will need. The less waste you produce the less you will be charged for collection.

Here are a few tips to reduce your waste:

Provide site information and maps for guests/ visitors which are accessible on smart phones rather than printed copies.

- Set up a collection point or donation station for any unwanted or surplus items your guests may want to donate at the end of their stay, this could include unopened, non-perishable food, children's toys and games, buckets and spades, or tourist information on local destinations. These can be used by other guests or donated to local charities.
- Donate surplus or unsold stock from any onsite catering premises – donate surplus food to charity or have an employee fridge for products that they can eat or take home free of charge. Guidance is available on [How food businesses must dispose of food and former foodstuffs - \(www.gov.uk\)](http://www.gov.uk).
- Use paperless marketing and communication methods, email welcome packs and site information.
- Purchase recycled, refillable or reusable products wherever possible.
- Provide water fountains for staff and guests to use.
- Use reusable cups, crockery, and utensils in catering services.
- For take-away drinks encourage customers to bring their own reusable cup by charging for single use cups.
- Ensure that packaging on your takeaway food and drink is minimised and that what packaging is used, can be recycled, or reused.

There may be some costs to making these changes for some sites but increasing how much you recycle could reduce your waste disposal costs in the medium to long run. As this law applies to all food and drink caterers, it will be factored into business and management models.

How to comply with the new recycling law

We recommend that you read [The Separate Collection of Waste Materials for Recycling: Code of Practice](http://www.gov.wales/workplacerecycling) (www.gov.wales/workplacerecycling) to double check you are doing everything you need to. This includes a list of all the specific types of things that have to be recycled.

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 campsites 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).

How to arrange a new recycling service

- Speak to your existing waste collector about your recycling needs and how they can work with your current collection service;
- Your recycling collection service, including the number of bins and how often they need emptying, may need to be flexible to take account of peaks and troughs in the tourist season.
- Speak to your collectors to decide if it is worth having recycling collections on certain days of the week e.g. after busy weekends or 'changeover days,' this will help prevent waste and recyclables building up;
- Maybe little and often works better for you. Most waste collectors offer different container sizes, including sacks for some waste. Once you start recycling you might be able to reduce the size of your general waste bin;
- You could also get quotes from a range of collectors to get the best price and the most suitable service for you.

If requested, councils must arrange waste and recycling collection services for you. There is a charge for these services. In rural areas you may find that options for waste and recycling are more limited, and that only councils will provide a collection service to you, especially if you do not produce a lot of waste.

Space for bins?

It is understood that space is at a premium in caravans and other types of holiday accommodation. There is no expectation or requirement to provide individual recycling bins for each stream in each caravan or accommodation type. The Regs do not set out requirements for bin configurations - the requirement is only to separate at the point of presentation for collection (refer to paragraphs 7.14 - 7.16 in the [Code of Practice](#)).

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 specified materials collected communally from a caravan site must be presented to the waste collector separately for recycling. It cannot be presented mixed to be sorted by the waste collector later. The method used to organise this within the units would need to be arranged on a case-by-case basis.

Options to collect materials from caravans include:

- Providing recycling stations at central and easily accessible locations across the site and ask visitors to take their recyclables to these locations;
- Providing small, stackable containers in accommodation units; or
- Providing clearly labelled coloured bags to assist guest with storing and transporting their recyclables to the recycling stations.

Bin location and storage

Ensure that containers and waste storage areas:

- Are clearly labelled to avoid contamination. You can use labels from the Business of Recycling Wales website (businessofrecycling.wrapcymru.org.uk).
- Are safe and accessible for people, including users with disabilities, and your waste collector.
- Are not in locations that cause an obstruction, a fire hazard or block escape routes.
- Provide sufficient capacity to cope with the types and amounts of waste and recyclables you produce and store between collections.
- Are not located near food preparation or storage areas for food safety and hygiene reasons.
- Close to where the waste and recycling is generated, i.e. in areas with high footfall at the entrances or exits, communal areas, concourses, next to concessions, food preparation areas, next to the facilities at campsites.
- Are tidy, clean, and free from clutter or loose waste.
- Are secure with close fitting lids, and do not allow waste or recycling to escape.

Engaging with visitors and guests:

There are posters and resources 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. (businessofrecycling.wrapcymru.org.uk).

- include messaging about your recycling system on your website and any social media channels, green and sustainable tourism is very popular;
- any recycling initiative should be a part of the experience and not seen as an 'add on';
- communicate clearly with your guests before, during and possibly after their stay;
- To keep recycling bins free from contamination ensure they are clearly labelled with what can and cannot be placed in the bins and can be easily located on your site via site maps or on-site signage;
- Provide clear information on your website and as part of the welcome pack provided to holiday makers on the recycling schemes in place and any other 'green' initiatives you are developing or implementing;
- Promote any successes, e.g. any increase in recycling rate;
- Ask guests for feedback on their stay and include how the recycling collection worked or could be improved.

Engaging with staff

When engaging with employees:

- Ask for ideas on how a scheme may work, as they may have spotted opportunities or issues which you have not considered;
- Provide clear instructions on what they should do with different waste streams or recyclables to help you meet your new recycling obligations;
- Provide training to permanent, seasonal, and temporary workers. Use orientation training to ensure new starters can recycle from day one, with regular training and reminders for all employees;
- Share information about recycling via regular updates at team meetings and on staff noticeboards so that employees hear about the differences their actions are making and
- Ask for feedback if recycling systems are not working well, ensure employees feel listened to and that issues are identified promptly before they cause bigger problems.

Managing the system

Some holiday businesses have expressed concern that their guests will not comply with the recycling systems and that their staff will then have to sort through bags of waste. This is not the intention of the new laws.

- 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.
- You are advised to monitor the effectiveness of your recycling system and make any change needed to ensure it is working well.
- You are advised to speak to your waste collector about contamination tolerance and the procedures they have for dealing with contamination.
- The Code of Practice (paragraph 7.37) contains more detail on steps you are advised to take in relation to contamination.

Compliance

- You will need to be able to demonstrate to the regulators that you are taking all reasonable steps to comply with the new regulations.
- Where non-compliance occurs, Natural Resource Wales (NRW) may provide advice and guidance as a first response where appropriate.
- 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 for each incident.

Additional resources and information

- Workplace Recycling Law - [The Waste Separation Requirements \(Wales\) Regulations 2023](#)
- Natural Resources Wales are the responsible for regulating the separation requirements and bans to landfill. They have produced information on their [Approaches to Regulating the Workplace Recycling Regulations](https://naturalresourceswales.gov.uk/about-us/news-and-blogs/blogs/workplace-recycling-nrw-approaches-to-regulating) (*naturalresourceswales.gov.uk/about-us/news-and-blogs/blogs/workplace-recycling-nrw-approaches-to-regulating*)

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