

## Business of Recycling Wales- Webinars

### Events Sector- 8 February 2024

#### Q&As

This document presents WRAP Cymru’s answers to the questions delegates asked during the ‘Events 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](https://gov.wales)

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

Question	Response
Where do you source the ‘wipe-clean bin toppers’ from, as I suspect there will be a lot of demand for these sorts of things, and bin wraps, special aperture lids, etc.	The ‘topper’ featured in Andy’s presentation were designed and purchased under the Wales Event Recycling Project. Please email <a href="mailto:walesrecycles@wrap.org.uk">walesrecycles@wrap.org.uk</a> for more information.
<b>Contamination &amp; enforcement</b>	
Can sorting be moved and done offsite?	<p>Yes, but you will need to have waste transfer notes (WTNs) for any waste moved offsite, even if it just for sorting.</p> <p>If you move it yourselves, you may also need a waste carriers licence and may need to register exemptions for the sorting activity.</p> <p><a href="#">Natural Resources Wales / Register or renew as a waste carrier, broker or dealer</a></p> <p>Please note, the waste can’t be moved by a third party (such as your waste collector) without being separated into the required streams first.</p> <p>It must be presented to the waste contractor separately in accordance with the Waste Separation Requirements (Wales) Regulations 2023 (and as explained in the Code of Practice).</p> <p>The requirement to separate is at the point of presentation by a waste collector. Please refer</p>

	to CoP 5.12 - 5.22 and 8.11 - 8.13 for handlers' guidance.
Question to Andy Fryers, Sustainability Director at Hay Festival, regarding the Hay Festival case study: Do you measure contamination, and do you have any top tips to reduce this?	Andy Fryers replied: Yes, we monitor it. My tips are reduce the range of items entering the waste stream, ensure all your bin signage is really clear with a mix of pictures and words, and be prepared to sort your waste back-of-house.
Question to Andy Fryers regarding the Hay Festival case study: How do you manage the contamination of recycling at an event if you don't have the resource to sort yourselves? It would be a huge job!	Andy Fryers replied: You have to have a crew to do this, either paid or volunteers. You can reduce contamination through good bin management, but it's not entirely avoidable.
Question to Andy Fryers regarding the Hay Festival case study: Who do you use for back-of-house sorting?	Andy Fryers replied:  We use paid crew.
Where outdoor bins are contaminated, these would normally be collected and charged as non-recyclable waste, unless someone is willing to re-sort them. Do the new regulations imply this will be a criminal offence for the events organiser and our commercial recycling team?	Section 7.7 of the Code of Practice includes some more information on contamination.  You need to take reasonable steps to ensure the material collected is as uncontaminated as possible. However, in the event bins become highly contaminated, you will need to discuss this with your waste collector.  You should also review what else you can do to improve compliance with the separation requirements.
If you are collecting from an outdoor festival, how can you monitor thousands of people putting their waste into the correct waste streams? And should we still be collecting if these are contaminated?	Andy Fryers replied: One option is you could have staff based at each bin to advise/instruct users, and/or sort each bin/bag back- of- house.  It is also important to have clear signage, 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 <a href="#">Code of Practice</a> (paragraph 7.37) contains more detail on steps you are advised to take in relation to contamination.
<b>Contractors</b>	
Is there a list of waste management companies that are signed up to deal with the new regulations?	All waste collectors operating in Wales will have to comply with this new regulation. When negotiating a service or contract with current or new waste collector you should check they are compliant to be sure. However, as explained in the Code they do not have to provide a service for all separated waste streams. Local Authorities do have to provide a full service to collect all materials separately.
<b>Food packaging &amp; food waste</b>	
Can you put compostable cups/plates/bags/etc. into material streams being treated by anaerobic digestion?	No, compostable containers can't be processed via anaerobic digestion and would therefore be a contaminant. For a detailed list of items that should and should not be separated out for recycling see Annexes 1-6 of the Code.
We're a social enterprise managing public access parklands, which include event spaces. We're often enabling event organisers, rather than delivering events ourselves. Is there a brief we may add to our booking form to help event organisers understand the requirements going forward, for predominantly food and drink packaging?	There isn't currently a template of this available, but it is something WRAP Cymru will look to develop. It is good to agree in advance with event organisers how and who is going to handle waste disposal.
Certified compostable single-use packaging (BS EN13432) can currently be treated as In Vessel Composting (IVC) but not anaerobic digestion (AD). Where would such packaging go in the future?	If your food waste collections service can't process compostable food service packaging, these items will have to go in the non-recyclable waste stream.
Question to Andy Fryers: Do you need a special provider to take your compostable plates?	Andy Fryers replied: We sent these items to a company in Hereford that's able to process compostable plates.  <b>Additional information:</b> Single-use plastic plates (this includes paper plates with a laminated plastic surface) were banned in Wales on 1 October 2023. For further guidance on this please refer to the guidance; <a href="#">Single-use plastics: statutory guidance   GOV.WALES</a>
We are a visitor attraction / zoo rather than an event. We have cafes which include takeaway options. We have some outdoor grounds waste bins for our visitors that were historically sorted by our contractors, but this	These regulations apply to all non-domestic premises, so that would include a visitor attraction / zoo. All obligated premises are required to present the listed materials separately for recycling. It's

<p>is no longer possible. Would we have to provide four bins (one for food, two for recycling, and one for non-recyclable waste) in each external area where there is currently just one bin? We do not allow glass into grounds for health and safety reasons.</p>	<p>up to each premises 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.</p> <p>Just collecting all waste in a residual litter bin and making no attempt to separate the required materials for recycling at the point of presentation for collection would not be in line with the new regulations.</p> <p>The regulations do not set out requirements for bin configurations. The requirement is only to separate waste at the point of presentation (refer to paragraphs 7.14 – 7.16 in the Code of Practice).</p>
<p>If you produce less than 5kg food waste, should food waste be put in the non-recyclable waste stream?</p>	<p>If you produce less than 5kg of food per 7-day period, then it can be placed in the non-recyclable waste stream. However, you can still choose to have a food waste recycling collection if you wish.</p> <p>If you do not produce over 5kg per week, then this should be monitored to take account of any changes. As an example, this weight might change due an increase in staffing levels or number of visitors.</p> <p>Refer to paragraph 8.6 in the Code of Practice for full details.</p>
<p>Can the separate collection of food waste be either composted or digested? What about at certain sites collecting food waste with garden waste for In Vessel Composting (IVC)?</p>	<p>The Code of Practice does not stipulate the method of recycling of food waste. However, under your duty of care, you must take all reasonable steps to ensure that when you transfer waste to another waste holder that the waste is managed correctly throughout.</p> <p>Paragraph 7.24 - 7.35 has more detail on food waste and 7.36 sets out duty of care.</p>
<p>Is there any funding available to help pay for additional staff needed to sort recycling back-of-house?</p>	<p>There is no funding available to pay for additional staff.</p>
<p>Is there some synergy with 'recycle-on-the-go' and will a guidance document and best practice case studies be published?</p>	<p>There is some synergy, and we will be producing case studies on examples of best practice over the coming months.</p>
<p><b>Litter bins</b></p>	

<p>I run events in town centres. We currently hire a waste management company that sorts the waste for us and monitors the existing council-owned town centre bins for overflow. What will the rules/responsibilities be around the monitoring of these general waste town centre bins going forward?</p>	<p>The new regulations do not apply to local authority litter bins. (See section 4.17 of the Code of Practice).</p> <p>The responsibility of managing the event's waste will fall to the event organiser and the separation requirements will apply. (See section 5.10 of the Code of Practice).</p>
<p>If an event is held in a public park or town centre where there is no control of the flow of people or numbers in attendance, will there be a responsibility for the event organiser to manage the waste in public bins as well as the waste they have control over from traders and exhibitors.</p>	<p>The responsibility of managing the event's waste will fall to the event organiser and the separation requirements will apply. (See section 5.10 of the Code of Practice).</p> <p>Any public bins put in place as part of the event will be the event organiser's responsibility. The arrangement for managing waste from existing (permanent) bins will depend on the arrangements you have with the landowner.</p>
<p>Are outdoor markets in the street excluded from the new regulations? Sometimes the waste spills over and street cleaners clear market waste.</p>	<p>Outdoor markets are included in the list of examples of non-domestic premises included under the new regulations. (See Annex 7 of the Code of Practice).</p> <p>How waste is to be managed during the market will be part of the agreement with the landowner (typically the council), but the separation regulations do apply.</p>
<p><b>Material</b></p>	
<p>Would event carpets be included in new regulations?</p>	<p>No, used carpet is not included in the separation regulations. Any unsold textiles (including carpet) would be covered by the separation requirement.</p> <p>As a textile, separately collected carpet is covered by the ban on landfill.</p> <p>Although not part of the regulations but you can choose to recycle this waste by using a specialist company.</p>
<p>Does food waste have to be separated into vegetables or meat streams?</p>	<p>No, the new regulations allow all food waste to be collected together. However, you will need to check with your food waste collector that its processing facility is suitable for the type of waste you produce.</p>
<p>The Code of Practice promotes putting laminated paper packaging with Tetra Pak, but Tetra Pak is not always keen on this. For example, crisp tubes, coffee cups, ice cream tubs, etc.</p>	<p>This will need to be discussed with your waste contractor and they will make clear how they need you to present that material for collection. The Code of Practice states the minimum requirements for separation. There is</p>

	<p>a mill that can recycle all of these items – contact ACE UK - <a href="mailto:enquiries@ace-uk.co.uk">enquiries@ace-uk.co.uk</a> the contact for who can recycle paper cups is <a href="mailto:cuprecycling@valpak.co.uk">cuprecycling@valpak.co.uk</a></p>
<p>Can you recycle a used cardboard ice cream tub, or does it go in general waste?</p>	<p>Any cardboard contaminated with food needs to be placed in the container for non-recyclable waste.</p> <p>However, an ice cream tub is likely to be included under the ‘cartons’ definition, as the cardboard will likely be laminated with plastic. If this is the case, it should be placed with the cartons stream (which can be mixed with metals and plastics).</p>
<b>Responsibility</b>	
<p>Where third parties are contracted to provide services, for example food and beverages, who is ultimately responsible for adhering to the regulations? Is it the individual contractor or the main event organiser?</p>	<p>Both parties are responsible under the new regulations. The event organiser will have responsibility for the event as a whole, but occupiers of individual stalls/ stands will also have a responsibility to ensure the regulations are followed. This could be clarified/negotiated in any agreements/contracts between the parties beforehand.</p>
<p>For events, such as food festivals, is it the organiser that is responsible or the individual businesses taking part?</p>	<p>You could also use the contract/ agreement to outline waste minimisation ideas and instructions on the preferred food and drink service packaging to use.</p> <p>You will also need to provide details to the stall holders on what is expected of them in terms of their own food waste generated.</p> <p>It is possible that under the licence agreement, the event organiser provides these services for the whole event, but the stallholder still has a responsibility to make sure the waste it produces is treated appropriately.</p>
<b>Separate collections</b>	
<p>Currently our waste management company sorts and separates our waste. Is this being stopped?</p>	<p>Waste management companies will no longer be permitted to collect mixed material for recycling; you will have to present your material to be recycled in the specified streams, and your waste management company will have to collect it separately and keep it separated. This reduces the chance of contamination and increases the quality of recyclables. This is explained in paragraphs 3.1-3.6 ‘High Quality Recycling’ of the Code.</p>



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).