

Workplace Recycling Law – a guide for registered care homes in Wales

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The Business of
Recycling Wales

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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](https://gov.wales/workplacerecycling) (gov.wales/workplacerecycling) and provides additional advice for Registered Care Homes.

It is now [law](https://legislation.gov.uk) (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.

...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. It is unlikely that care homes will have any unsold textiles or unsold small waste electrical and electronic equipment (sWEEE) to dispose of.

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 any 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.

All care homes must correctly separate recycling to be collected whether you own, rent, or lease your premises.

How to better understand your waste and recycling

To understand the different types of waste you produce, undertake a [waste audit](https://businessofrecycling.wrapcymru.org.uk) (businessofrecycling.wrapcymru.org.uk) by walking through the different rooms and areas within your building, e.g., residents rooms, offices, kitchens, food preparation, storage, laundry and communal spaces such as dining rooms and lounges. It is useful to examine the contents of general bins to understand what waste is being generated, and to highlight any waste reduction or recycling efforts that are already in place.

The areas where you are most likely to generate waste could be:

- Canteens and kitchens – food (e.g. preparation waste) and packaging waste;
- Laundry and stores – packaging waste;
- Staff and break rooms - paper and food packaging waste;
- General offices – paper;
- Dayrooms, bedrooms and bathrooms – paper, packaging;
- Activities and workshop spaces – paper and packaging waste and
- External grounds such as gardens and outside seating spaces - food waste and packaging.

Care homes may also generate other types of waste such as clinical or offensive waste (such as incontinence pads), and hazardous waste, such as paints, oils or chemicals. These types of waste require a specialised waste collection service and do not fall under the new law.

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:

- Donate surplus or unsold stock – 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' (gov.uk)
- Use paperless marketing methods via online platforms.
- Purchase refillable or reusable products such as reusable cups, crockery, and utensils. Providing water fountains for staff and residents to use will avoid using single use plastic bottles.

There may be some costs to make these changes initially but reducing how much waste you produce could reduce your waste disposal costs in the long run.

How to comply with the new recycling law

If you are already separately collecting and recycling all the materials you need to under the new law, then you may not need to do anything else. We recommend that you read [The Separate Collection of Waste Materials for Recycling: Code of Practice](https://gov.wales/guidance/the-separate-collection-of-waste-materials-for-recycling-code-of-practice) (gov.wales) to check you are doing everything you need to comply with the new law. This includes a list of all the specific types of things that **must** be recycled.

Independent businesses:

If you operate your business independently, such as a privately owned or care home, setting up a recycling service and ensuring you are complying with the new law will be your responsibility.

Franchises or larger organisations:

If you are part of a larger organisation or charity with more than one site, then waste management services might be arranged centrally on your behalf.

How to arrange a new recycling service

If you need to organise a new recycling service, it's worth considering the following:

- Do you need to have collections at certain times or days of the week to accommodate changes in waste volumes and ensure site safety? Remember waste collection vehicles can be a hazard to vulnerable residents or visitors if they need to travel across areas of high footfall;
- What is the amount or type of waste you regularly produce? Does this change during the year? For example, increases at times when you may be accommodating additional residents. Your recycling collection service, including the number of bins and how often they need emptying, may need to be flexible;
- 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;
- If you don't have much space for external containers, could you share bins with other businesses to help reduce costs and space? Note waste containers can't be stored on the public highway in between collections;
- Speak to your existing waste collector about your new recycling needs. They will need to be aware of the new law and ensure the services they offer will be compliant, and
- You could also get quotes from a range of collectors to get the best price and the most suitable service for you.

How to arrange a new recycling service

If you are a local authority-run home, arrangements may be made for similar homes in your local authority area. The workplace recycling law applies to all local authority premises, so procurement may occur centrally to reduce time and effort.

Public sector organisations can utilise framework contract agreements procured by professional buying organisations such as:

- [Sell2Wales](https://sell2wales.gov) (sell2wales.gov) to procure goods and services, saving you the time and effort, and possibly money too.
- The [Eastern Shires Purchasing Organisation \(ESPO\)](http://www.espo.org) (www.espo.org) provides a framework for the procurement of collection services for waste, dry recycling and food waste via [Framework 379_21](#)
- Yorkshire Purchasing Organisation (YPO) provides a range of frameworks under its [Facilities and Waste Management](#) section (YPO.co.uk) for the procurement of goods and services such as compostable liners, indoor and outdoor waste and recycling containers, wheeled bins and recycling services.

You should monitor the effectiveness of your new waste system and make changes where improvements are needed. It is the responsibility of the site owner to decide on how often it should be reviewed, potentially in consultation with your waste management service provider.

Food waste & hygiene

Care homes with canteens or kitchens inevitably generate food waste in larger quantities than those establishments not preparing and cooking food on site. There are guidelines on food waste to help you dispose of waste properly to meet the existing waste [Duty of Care](#) law (naturalresources.wales).

The [Food Standards Agency](#) (www.food.gov.uk) also provides guide which means you need to:

- Store food waste in sealable containers which are:
 - Solid, and strong enough to hold food waste,
 - In sound condition – i.e., without breakages or splits that could enable pests to access waste or cause leaks; and
 - Easy to clean and disinfect;
- Remove food waste and other rubbish from areas as soon as possible and
- Have enough waste storage facilities to store and dispose of food waste and other rubbish to keep them clean.

Ensure any changes you make are incorporated into your Food Safety Management Systems.

If your food waste collector allows you to use compostable liners, ensure that your liners are BS EN 13432 compliant. This means that all the food waste is sent for commercial processing to meet the right standards.

Under the new law, food waste must be separated from other waste and collected for recycling and recovery of renewable energy and nutrients using a food waste collection service. It must not be disposed of down the drain to sewer to avoid overload of the sewage system, blockages and the loss of valuable energy recovery and nutrients. Food waste collected for recycling will be sent to anaerobic digestion plants to generate renewable energy and produce digestate and fertiliser products.

Food waste & hygiene

The definition of food waste that must be separated for collection and recycling, and must not be disposed of to sewer, is contained in paragraph 4.13 of the [Code of Practice](https://gov.wales/workplacerecycling) (gov.wales/workplacerecycling).

Drink is excluded from the definition and so can be placed down the sewer. In addition, the definition of food waste does not include food waste that is mixed with water having been used to clean any place or equipment used in processing or preparing food or drink. This means that food waste, including liquid food waste such as soups, that is washed down the sewer as part of the process of cleaning out leftovers from bowls, cups or pans are also excluded.

However, if you are regularly producing liquid food waste for disposal outside of the cleaning process exclusion mentioned above, then you will need to separate this out for collection and onward recycling. You should talk to your food waste collector about whether they can accommodate your liquid food waste in their regular food waste collection service. If not, you may be required to arrange a specialist liquid food collection service.

In addition, if you are regularly producing large quantities of food waste, including soups or other liquid food, you should review the [Food Waste reduction roadmap toolkit](#) or the [Guardians of Grub](https://wrap.org.uk) (wrap.org.uk) resource to see how to reduce food wastage in line with your responsibilities under the food waste hierarchy (see section 2 of the Code of Practice for more information).

Refer to our guide for the [Hospitality and Food service sector guide](https://businessofrecycling.wrap.org.uk) (businessofrecycling.wrap.org.uk) which will provide more information on collecting food waste for recycling.

Location of internal bins

The key requirement of the law is that household type waste is separated for recycling to be picked up by your waste collector. There is no prescribed way of how to collect the specified materials before being collected. It is good practice to provide separate containers for each recyclable waste stream, however this is not a requirement. In some circumstances, this will not be practical or achievable.

All care homes are different, and each premises will have to consider the best solution or combination of solutions for their circumstances. However, possible options include:

- Providing recycling bins in communal locations such as corridors, near lifts, in day rooms etc for staff, residents and visitors to use (in addition or in place of bins in each individual room)
- Where space is limited space saving options exist such as;
 - a space saving container solution such as compact multi compartment bins or stackable recycling bin
 - a two-container solution– one for non-recyclable waste and one for clean and empty recyclable waste –this may require further sorting depending on the range of recyclable waste being collected (as you might do with the waste placed in the bin in your bedroom or bathroom at home.)
- Where there are concerns over certain residents using bins inappropriately, providing containers in locations only accessible by staff is an option (with waste generated by residents such as packaging being collected and sorted throughout the day instead.)

Bin location and storage

It is important you consider where and how you will store your waste and recycling prior to collection.

Ensure that all containers and the waste storage areas:

- Are safe and accessible for staff 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;
- Are tidy, clean, and free from clutter or loose waste and
- are secure with close fitting lids, and do not allow waste or recycling to escape.

It is important to:

- label your recycling bins to avoid contamination. You can use [labels](https://businessofrecycling.wrapcymru.org.uk) from the Business of Recycling Wales website (businessofrecycling.wrapcymru.org.uk) and
- prevent water from contaminating any stored waste.

Following this advice and guide will also help avoid any pest control problems.

Accessibility

The Welsh Government wants everyone to be able to reduce, reuse and recycle their waste no matter where they live, their health, mobility and personal circumstances. [towards-zero-waste-our-waste-strategy.pdf](#) (gov.wales)

Wherever you can, you should make appropriate adjustments to your waste and recycling system so staff, residents and visitors are able to understand what they need to do. There is an easy read guide to the new rules here: [Separate Collection of Waste Materials for Recycling.](#) (gov.wales)

Using clear consistent labelling and colours and ensuring staff, visitors and residents receive appropriate information about the new recycling system should help. There are [labels](#) and posters for recycling bins to avoid contamination available from the Business of Recycling Wales website ([businessofrecycling.wrapcymru.org.uk](#))

Engagement and communications with residents and visitors

You could broaden engagement and messaging on recycling to staff, residents, and visitors by:

- Label all bins clearly with the nationally recognised [Wales Recycles icons](http://wrapcymru.org.uk) (wrapcymru.org.uk) so people know what can and cannot be recycled. Many local authorities use the same icons which your residents and visitors may be familiar with from their household recycling collections. This may lead to improved engagement with the care home onsite recycling provision.
- Ensure all information and bin labels use consistent colours and iconography across the entire care home site to avoid confusion.
- For large premises you could consider providing maps on site to identify recycling points as well as what can be accepted for recycling at each location.
- Ensuring new residents are provided with recycling information in a suitable accessible format.
- Include information on recycling within information guides provided.
- Put up posters around the site with recycling messages and information.

Engaging with staff

When setting up a recycling system it could be of benefit to engage and liaise with:

- Managers / colleagues responsible for procuring goods and services;
- Ensuring all existing and new employees are provided with clear recycling messaging, and training, which is ongoing as well as part of their induction.
- Staff responsible for emptying internal bins into external containers, who liaise with waste or recycling collectors;
- Cleaning staff to ensure waste is correctly sorted and to ask them to report issues such as overflowing bins or contamination to the caretaker or management team. They can also advise if you have the correct waste capacity or need more;
- Catering staff in on-site kitchens to reduce avoidable food waste via portion control and production of excess and unavoidable food waste;
- Your Facilities Management providers (if used) to ensure recycling services are provided;
- Grounds or estates staff need to know about changes to collections, and the locations of bins they will use when completing their duties i.e., litter picking or emptying external litter bins;
- Activities co-ordinators can link activity sessions to those recycling activities which clients or residents can get involved in and
- Sustainability officers (common in larger establishments or organisations with more than one site) usually report and engage on environmental and sustainability issues such as waste management.

Staff training ideas

- Ask for ideas on how a system 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 and temporary staff. 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.

You can use our [resources](#) when engaging with your employees. (businessofrecyclingwreapcymru.org.uk)

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](#) (naturalresourceswales.gov.uk/about-us/news-and-blogs/blogs/workplace-recycling-nrw-approaches-to-regulating)
- There is a ban on [Single Use Plastics](#) including plastic cutlery, drink stirrers, polystyrene products and drinking straws. (gov.wales/environmental-protection-single-use-plastic-products-wales-act)
- [Plastic packaging in the hospitality and food service industry](#) provides many challenges and opportunities, the UK Plastic Pact has four targets working towards a world where plastic is valued (wrap.org.uk)
- The [Food waste reduction roadmap toolkit](#) provides actions to help you reduce food waste. To see what others have done go to [Hospitality and food service case studies](#) (wrap.org.uk)
- If you are looking for ideas of what to do with leftover food, the [Surplus food hub](#) can help (wrap.org.uk)