

Business of Recycling Wales- Webinars

Education Sector- 20 February 2024

Q&As

This document presents WRAP Cymru’s answers to the questions delegates asked during the Education 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 for all workplaces \(wrapcymru.org.uk\)](https://wrapcymru.org.uk)

Question	Answer
Is there any evidence that shows the cost of additional recycling bins can be offset by a reduction in cost to the organisation of waste going to landfill/incineration, or reduced cleaning hours emptying the individual 'under desk' bins?	The relative costs of the new system have been analysed. You may find out more in Welsh Government’s Regulatory Impact Assessment: Regulatory Impact of Options to Increase Workplace Recycling in Wales (gov.wales)
Bins	
Do you sell the bins as shown in the previous slide?	We don’t supply or recommend any particular bins, but a quick search online will help you find some companies that sell recycling bins. We advise you shop around to find the bins that suit your needs. There are lots of suppliers of internal recycling bins/stations, including some based in Wales. Some provide bespoke bins for drinks cups.
Communication	
Have you considered using schools and children to help launch the scheme and sell it into other non-domestic premises?	Welsh Government has produced a case study of a school in Powys that has rolled out a recycling scheme in line with the new laws: Workplace Recycling at Ysgol Rhiw-Bechan, Powys (youtube.com) (English); Ailgylchu yn y Gweithle yn Ysgol Rhiw-Bechan, Powys (youtube.com) (Welsh) Wales Recycles also launched the Mighty Food Waste Mission in September 2023, which provides a range of information, advice and resources to engage pupils and put recycling into practice. Eco-Schools is a global initiative and is delivered in Wales by Keep Wales Tidy . The programme is designed to encourage and inspire young people to

Question	Answer
	make positive environmental changes to their school community.
Support with engaging learners, and not just the staff, would be really helpful, especially secondary school pupils.	Our 'Guidance for Education' provides information on engaging with staff and pupils: The Business of Recycling Wales Guidance for all workplaces (wrapcymru.org.uk)
Are the signage and other resources available bilingually?	Yes, the signage and resources are available bilingually: Workplace Recycling -Resources (wrapcymru.org.uk)
I can't see the Welsh language versions of the downloadable resources. Can you please share the link to these?	Ailgylchu yn y Gweithle - Gweminar (wrapcymru.org.uk)
Please could the link to the poster resources be posted in the webinar's Q&A?	<p>Posters shared by Isle of Anglesey Council have been sent with this Q&A document.</p> <p>All other resources are here - Workplace Recycling - Resources (wrapcymru.org.uk)</p>
Are we able to view the promotional document and replacement bins used in Anglesey?	
Are you able to share the posters you gave to schools please?	
Do you have any promotional resources for primary schools?	
Compliance	
What is the enforcement process for schools that are going to be physically unable/struggling to afford these new bins, etc? My school has experienced a massive funding cut, and these new regulations will put massive pressure on our finances.	We have a range of communications assets that are free to download on the Business of Recycling Wales website: The Business of Recycling Wales Guidance for all workplaces (wrapcymru.org.uk)
I'd be interested about how much cross contamination Georgina Taubman from Cardiff University who presented at the webinar, has experienced? I can foresee us having to check and sort through bins.	We advise you review the bins you have on site, consider the materials you're putting in the bin, and think about how you can make best use of your existing containers. You can label these with the free posters making clear what items should be placed in each bin.
How did the large secondary school deal with cross contamination in their outside bins?	<p>Natural Resource Wales will be enforcing these regulations. They have advised that in line with their Regulatory Principles, they will be taking a targeted and risk-based approach to regulation focussing on outcomes and will be taking a fair and proportionate approach to enforcement, in line with their Enforcement and Sanctions Policy, with an initial emphasis on providing support and guidance to bring businesses and workplaces into compliance. I hope that is reassuring. If you have any further questions on compliance you may wish to contact Natural Resources Wales at diwygiogwastraff@cyfoethnaturiolcymru.gov.uk</p>
Will schools get time for this system to bed-in, as secondary school pupils will need time to learn how to put items in the correct bins and we aren't able to pay staff any extra hours to sort the waste?	
I'm concerned about the lead time into becoming complaint with the new law, as we only have six weeks to put the changes in place?	

Question	Answer
	<p>There is no grace period for schools or workplaces to implement the changes. The law takes effect from 6 April and you'll need to take steps now to become compliant by this date. We advise you contact your waste contractor now to discuss your needs under the new law.</p>
Cross-border	
<p>How does it work if a school resides in England, but the waste carrier takes the recycling to Wales? Is the school subject to the new law? Is the carrier subject to the new law?</p>	<p>If the school is in England, it doesn't need to comply with the new Welsh law. If the waste is brought into Wales, the waste carrier will need to comply with all relevant Welsh legislation relating to the transport, storage and processing of the waste it collects.</p>
Enforcement and fines	
<p>Will the fines issued be a universal amount across all facility types and sizes?</p>	<p>You will find information about the fines in the Code of Practice: Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales GOV.WALES</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.</p> <p>The fixed monetary penalties will be either £300 or £500 depending on the breach.</p>
Food waste	
<p>Will we be fined for composting food waste?</p>	<p>No, your organisation won't be fined as long as you comply with the regulations relating to the composting of food waste.</p> <p>You will need to ensure you consider The Animal By-Products (Enforcement) (Wales) Regulations 2014.</p> <p>The Code of Practice says: 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 Animal By-Products (Enforcement) (Wales) Regulations 2014 and Regulation (EC) No 1069/2009, and any other relevant regulations.</p>
Funding	
<p>Is there any funding available for the purchase of the bins? Outside bins are expensive.</p>	<p>Unfortunately, there is no funding available to support organisations to comply with the new regulations.</p>
<p>This is a great initiative, but my school is in deficit and currently making redundancies. Is</p>	

Question	Answer
there any funding support to buy new recycling bins as they are quite expensive.	
Is there any help for charities? Our independent school is a charity.	
Local authorities	
Was there a reason that Isle of Anglesey County Council didn't use its own in-house recycling team instead of tendering a contract?	Response provided by Isle of Anglesey County Council: We have a history of outsourcing waste collection services rather than running them in-house. We've used an external contractor for many years, so it was natural to do the same again.
I like the way Cyngor Sir Ynys Môn has worked together to support the businesses actors the county. By having the council negotiating with waste companies on organisations' behalf, it must have a greater impact than individual organisations trying to do this on their own.	Response provided by Meirion Edwards, Chief Waste Management Officer, Isle of Anglesey County Council: Yes, the engagement with potential bidders for the 7+ sites before the formal procurement worked really well.
Will local authorities provide the bins and advise on collection days, etc.? Thus far, we've not had much information from our council.	If your local authority is your waste collector, it should advise you but it might not have finalised its arrangements including its collection days. We advise you contact your local authority to find out when you're likely to receive information from them about the changes to your collections service.
Do you have contact details for the person or team at Swansea Council that leads on recycling in schools? We're an independent school that's a charity, and therefore classed as a business, but we've not been able to speak with a representative from the council.	We advise you try contacting the team at Swansea Council at commercial.waste@swansea.gov.uk You may also choose to contact other waste contractors in your area.
In Cardiff and on Anglesey, are there any examples of how the changes carried out to comply with the new law have reduced waste?	Response provided by Isle of Anglesey County Council: The tonnage data under our former contract was not good, so we don't have a good baseline. We've been running a compliant service for six months and have not yet seen a significant reduction overall.
On Anglesey, how many bins did you install on the school playground?	No new bins were added to the playground and they reused the old kerbside boxes for internal use.
Do you have contact details for the person or team at Carmarthenshire County Council that leads on recycling in schools?	We advise you try contacting the team at Carmarthenshire County Council at TSWasteOps@carmarthenshire.gov.uk
Should we speak to our local authority about funding or match-funding for bins?	Local authorities haven't been given any funding from Welsh Government to fund new bins, but if you have a collections service contract with your local authority, it might be able to offer some advice.
What was the average increase in costs for schools across Anglesey?	Response provided by Isle of Anglesey County Council: We were expecting a big increase in the costs for schools, however this was not the case. The cost increased by around £10k each year for our 70+ sites in total, which is quite small on average. The

Question	Answer
	service is much better, and the recycling outputs are excellent.
Liquids	
What should we do if there is still liquid left in plastic bottles?	Ideally, liquids should be kept to a minimum for hygiene reasons but check with your waste contractor for acceptable limits if you're concerned.
Would liquids like coffee, tea, fruit juice, yoghurt, etc. have to be collected by a waste contractor and not go down the sink?	Food will need to be collected separately, but not drinks.
Does the ban on food waste down sinks include liquid like left over soups etc in staff rooms?	<p>All food, including soups and yoghurts will need to be disposed of through a food waste collections service.</p> <p>Only drinks can be poured down the sink to sewer.</p> <p>To find out what's considered food waste under the new law, see Annex 4 of the Code of Practice.</p> <p>Please check with Dŵr Cymru Welsh Water or Hafren Dyfrdwy as you might need to source a 'trade effluent order'. Please be mindful of the ban on food waste to sewer and its definition of liquid foods, which for this purpose doesn't include "drinks".</p>
Litter	
Could you perhaps say a few words regarding <i>Recycle on the Go</i> litter bins on the grounds of non-domestic premises? Whilst council street cleansing duties are exempt, "grounds" of venues are not, and I suspect most schools have a novelty litter bins on the playground, and many schools open their playing fields and playgrounds to the public after hours and have dog poo bins, etc. Will schools need to replace their litter bins with <i>Recycle on the go</i> -type bins?	<p>All schools are required to present the materials listed in the new regulations separately to be recycled. This includes materials collected in areas like playgrounds, usually put in litter bins.</p> <p>It's up to each school to decide how they can most effectively separate these materials. However, having separate recycling bins next to litter bins can be a good way to do this.</p> <p>Any school that collects its waste in a single litter bin and making no attempt to separate the required materials for recycling for collection, would not be in line with the new regulations.</p> <p>It'll be up to each school to work out the best configuration of bins depending on the amount and type of materials that are produced.</p>
Our outside bins contain food waste, paper, and wrappers from the public, and are then put in our main bins for non-recyclable waste. Is this okay or will they need sorting too?	
Material	
I noticed recently that shredded paper can't be put in the paper/card waste stream. Which waste stream should this go into?	Shredded paper may cause issues at recycling plants. We advise you ask your waste collector how they'd like you to present this item to be recycled.
Why can't shredded paper go into the bin for paper?	
Can metals, plastics and cartons be put in the existing recycling bins for plastics? Many	Metals, plastics and cartons (the minimum separation) can be put in the same bin providing this

Question	Answer
schools aren't going to have space for more bins.	<p>is how your waste collector wants you to present these materials.</p> <p>See Annex 2 of the Code of Practice for the full list of materials that should be collected separately.</p>
<p>What about soiled paper, such as wet paper towels in toilets and tissues used to blow noses?</p>	<p>These items should be put in the bin for non-recyclable waste.</p> <p>See Annex 3 of the Code of Practice for the full list of items that should and shouldn't be put in the cardboard and paper stream.</p> <p>The Code of Practice provides advice on contaminated packaging. Your waste collector can also advise you on this.</p> <p>Paragraph 7.7 and 7.37 of the Code of Practice has more information on reducing contamination.</p>
<p>What should be put in the bin for non-recyclable waste, and how should this be collected?</p>	<p>Anything that isn't included in the recycling streams should be put in the bin for non-recyclable waste. This stream should be collected by your waste collector.</p>
<p>Does flexible plastic film, such as yoghurt pot lids, crisp packets, chocolate bar wrappers, Clingfilm, etc., need to be separated and kept out of bins for non-recyclable waste?</p>	<p>No, flexible plastics are not covered by the law's separation requirements.</p> <p>See Annex 2 of the Code of Practice for the full list of items that should and shouldn't be put in the plastics stream.</p>
<p>What about teabags?</p>	<p>You should put teabags in the recycling container for food waste.</p>
<p>We own a couple of cafes and a food truck where we use disposable containers and cutlery, which are obviously contaminated with the food we serve. Should these items be put in the bin for non-recyclable waste?</p>	<p>Any food packaging contaminated with food must be put in your bin for non-recyclable waste: see Annex 3 of the Code of Practice.</p> <p>The Code of Practice provides advice on contaminated packaging. Your waste collector can also advise you on this.</p> <p>Paragraph 7.7 and 7.37 of the Code of Practice has more information on reducing contamination.</p> <p>For Information: Single-use plastic products were banned in Wales on 1 October 2023. For further guidance on this and what items are included in the ban, please refer to the guidance; Single-use plastics: statutory guidance GOV.WALES</p>
<p>Milk</p>	

Question	Answer
<p>Do recyclable items, such as milk bottles, need to be washed before being put in the bin to be collected to be recycled?</p> <p>We dispose of a few hundred milk bottles every day, and are concerned how schools like ours will manage this?</p>	<p>Ideally, there shouldn't be any milk leftover in bottles, for hygiene reasons. We advise you speak with your waste collector about any concerns you have.</p> <p>If you're regularly throwing away large amounts of milk, you should review your practices to see if you can make changes that will save money and waste less.</p>
<p>The children have small bottles of milk every day. How should we dispose of the milk that hasn't been drunk and is out of date or no longer safe to drink?</p>	<p>We've produced a case study on Comparing Milk Packaging Options for Monmouthshire Primary Schools that you might find useful.</p>
<p>Can we pour undrunk milk that children don't finish down the sink, or is that not allowed?</p>	<p>Paragraph 4.13 of the Code of Practice states that drinks are not food and can therefore be poured down the drain to sewer. However, if you're pouring significant quantities of milk away, you may need to check with Dwr Cymru or Hafren Dyfrdwy – you may need to seek a 'trade effluent' order.</p> <p>Be mindful of the food waste to sewer ban and the definition of liquid foods, which does not include drinks.</p>
Process	
<p>Our waste goes to Veolia. Is this is incinerated?</p>	<p>You'll have to check with Veolia what process they're following; they will have to comply with the new legislation. It will not be acceptable to incinerate material collected for recycling. Please see the Code of Practice for further details.</p>
<p>Many of our schools don't have caretakers or site managers. How must we rely on our teaching staff to lead on the changes?</p>	<p>Our 'Guidance for Education' provides information on engaging with staff and pupils: The Business of Recycling Wales Guidance for all workplaces (wrapcymru.org.uk)</p>
<p>As a school, must we arrange the changes to our collection of recycling and non-recyclable waste from our site, or will the local authority arrange this?</p>	<p>You would normally make these arrangements yourself, as you know best the waste you produce.</p>

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