



Douglas City Council

Committee Report

REPORT TO	
Environmental Services Committee	
DATE OF MEETING	
13 th January 2025	
REPORTING OFFICER	
Head of Waste Services	
SUBJECT	
Acceptable Recycling Receptacle Operating Procedure	
1	REASON FOR REPORT
To recommend to Committee an acceptable recycling receptacle Operating Procedure that encourages recycling but enables the collection crews to use their discretion where material is presented unacceptably.	
2	RECOMMENDATION
Committee to support the attached Operating Procedure.	
3	FURTHER APPROVAL REQUIRED
Not applicable	
4	SUPPORTING RATIONALE
<p>This report has been prepared to present the Committee with a new proposed Operating Procedure of what should and shouldn't be acceptable in the way households present their recycling. This report follows enquiries from Councillors about the possibility of supplying alternative receptacles, such as the stacked trolley system or whether households can supply their own boxes. These points are addressed in the attached Operating Procedure.</p> <p>In addition, recycling receptacles were the subject of an earlier report presented in July 2024, which sought agreement towards a policy of four boxes per household, with all material streams separated. Committee determined not to support the four-box proposal but was sympathetic to the predicament collection crews often faced, particularly in relation to heavily contaminated boxes and or receptacles that were unsuitable for this application.</p>	

In recognition of the difficulties faced by collection crews, the Committee has requested that a policy position is formulated which identifies an acceptable criterion for recycling receptacles, whilst enabling crews to use their discretion where the receptacle or materials do not meet the criteria.

The proposed Operating Procedure is attached at Appendix 1 to this report. The Operating Procedure document sets out the following:

- Purpose and aim of the procedure
- Background information
- Scope
- Key considerations and exceptions
- Action for rejected recycling
- Conclusion

To summarise the proposed Operating Procedure, firstly, there is a presumption that recycling will be collected from households which have made the effort to recycle, and this is the overriding principle. However, frequently collection crews encounter recycling which is presented in such a fashion that it is incapable of being hand sorted into the collection vehicle without the risk of injury or a need to vary from standard operating procedures and safe systems of work. This document considers the criteria of what makes a receptacle fit for purpose whilst also identifying situations where it is reasonable to make an exception. Primarily, the Operating Procedure seeks to establish the principle that collection crews have sufficient autonomy to decide what is and isn't acceptable, based on the evidence presented.

In scenarios where the recycling is adjudged to be outwith the spirit of the Operating Procedure and does not constitute a reasonable exception, the collector must communicate this to the householder, either in person or by leaving a notice, in the form of a printed card, which enables the collector to select the reason for its rejection and provide detail of how the householder can contact Waste Services. The card will also include a QR code which when scanned takes the householder to the Council's recycling video concerned with collections.

5	ALTERNATIVES CONSIDERED BUT NOT RECOMMENDED
----------	--

Not to adopt the Operating Procedure – this is not recommended as the current situation lacks clarity for collectors, who are liable to take risks such as lifting overloaded boxes or hand sorting receptacles that contain broken glass or sharps, for fear of criticism or admonishment.

6	IF PREVIOUSLY CONSIDERED BY COMMITTEE OR COUNCIL, DATE AND DECISION
----------	--

ENVIRONMENTAL SERVICES COMMITTEE - Monday 14th October 2024

A4. Matters Arising from the Minutes

Clause A4 - Matters Arising – Recycling Boxes Policy; Following a comment at the October Council Meeting, Members discussed the feasibility of accepting receptables purchased directly by households such as trolley boxes. It was agreed that a policy on recycling and refuse receptables be drafted for Committee consideration.

ENVIRONMENTAL SERVICES COMMITTEE - Monday 16th September 2024

A4. Matters Arising from the Minutes

Clause B11 – Recycling Boxes Policy; It was noted that a briefing note would be circulated to the Committee to update on attendance at the exhibition. In response to question, the Committee agreed that the trolley box recycling receptables should not be revisited. As part of this briefing note further information on the four-box recycling consideration would be provided.

The Committee were advised that Executive Committee had requested that the funding for KBT membership be budgeted for in future years, with annual consideration of continued membership as part of the budget process.

ENVIRONMENTAL SERVICES COMMITTEE - Monday 15th July 2024

B11. Recycling Boxes Policy

Resolved, "That particulars of the report and discussion be noted on the minutes;

- (iv) That the proposed policy for four boxes per household be reconsidered after attendance at the RWM conference;

2 For. 2 Against.

Mr Councillor J.E. Skinner and Councillor Ms J. Thommeny asked that their names be recorded as voting against the resolution. The Chair exercised his casting vote in favour of the recommendation.

- (iv) That boxes containing hazardous items and/or that are heavily contaminated (as defined in the body of the minute) are not collected and the household is notified why;
- (iv) That a communication campaign using multiple channels including a promotional video at an estimated cost of £2000 be approved; and
- (iv) That the matter be referred to the Executive Committee seeking general revenue reserve funding in the sum of £2000."

3 For. 1 Against.

Mr Councillor J.E. Skinner asked that his name be recorded as voting against resolutions (iii) and (iv).

ENVIRONMENTAL SERVICES COMMITTEE - Monday, 17th October, 2022

A8. Attendance at RWM and Lets Recycle Live 2022

The Committee considered a report submitted by the Senior Engineering and Waste Services Manager advising on the attendance at this year's Recycling and Waste Management Exhibition and Conference (RWM) and seeking approval for a Member and officer to attend in 2023.

Detailed within the officer's report was an overview of the two day attendance at the RWM Exhibition and Conference held on 14th and 15th September, 2022. Members were advised that the conference is a primary resource for keeping abreast of the industry, meeting suppliers and networking with others involved in waste management.

Members were advised that whilst at the exhibition, officers had researched alternative recycling boxes, including those with fixed lids. It was noted that the boxes on display were those currently ordered by the Council as they are primarily used across the industry. The Director of Environment and Regeneration advised that fixed lids are available, however they reduce capacity.

A discussion on alternative recycling receptacles ensued during which it was suggested that the white bags continue to be promoted and offered to residents as they are considered a good method of collection for paper and cardboard. Members agreed that a stock of lids and bags be purchased in order that they can be offered to residents on request.

There was discussion on trolley box systems. The Director of Environment and Regeneration reminded Members of a report previously considered by the Committee in relation to alternate recycling receptacles when trolley boxes had been discounted, she undertook to recirculate information about trolley box systems that are available for purchase online.

In response to question, the Director of Environment and Regeneration advised that if attendance at the 2023 RWM Exhibition was deferred for one year it would provide a saving of approximately £2000.

Resolved, "That particulars of the report and discussion be noted on the minutes and that attendance at the RWM Waste Management Exhibition and Conference be deferred for one year and reviewed again in 2024."

A6., Alternative Receptacles for Recycling

The Committee considered a report submitted by the Senior Engineering and Waste Services Manager setting out the market options for recycling receptacles.

Members were reminded that when kerbside was initially rolled out all households were provided with two boxes; a green box with net cover for glass, cans and plastic bottles and a blue box for newspapers, magazines, pamphlets and grey and white card, noting that when recycling in flats was brought on stream residents had been provided with recycling bags on the basis that they would have little or no external capacity for boxes.

Members were advised that the kerbside service was suspended during the lockdown period due to it being a non-essential service, during this time, a review was carried out on the best methods for collecting and sorting recyclables to ensure resilience against future pandemics. It was noted that some of the measures employed were retained, notably that glass was being kept separate from cans and plastic so as to avoid handling contaminated materials. Members were advised that this was a departure from the original method as it required the use of third receptacle.

Members noted that post Covid-19, the following box/bag arrangement is in place;

- Green box – mixed plastic and cans
- Blue Box – Glass
- Bag or box – paper, white and grey card

The Senior Engineering and Waste Services Manager advised that the current arrangement, as set out above, is consistent with the Waste and Industry Safety and Health guidance.

Members were advised that cardboard collection is due to be added to kerbside from mid-November 2020 following the approval and procurement of two new 'Romaquip' 'Kerb-sort' vehicles which incorporate a cardboard compaction facility. It was noted that householders will be given the option of an additional box or recycling bag. As the Council gave householders the option to acquire a third receptacle during lockdown many households are now in a position to add cardboard with little disruption.

In response to question, the Senior Engineering and Waste Services Manager advised that there are approximately 1000 recycling bags and 1000 recycling boxes in stock and that there is budget provision to replenish this stock annually.

Detailed within the report were options for the Committee to consider for a stacked trolley system, similar to that being used by Braddan Commissioners. Having reviewed the options Members considered that the Council was not currently in a position to pursue this option and agreed that the Council continue to monitor the effectiveness of the Braddan Commissioners trial. In response to a Member suggestion, the Director of Environment and Regeneration advised that officers would need to liaise with the supplier to determine whether individual residents could purchase a trolley system directly from the supplier.

Members discussed the calendar that is issued to residents to promote the kerbside service. In response to question, the Senior Engineering and Waste Services Manager confirmed that if instances occurred where residents used the historical method for the Green box (glass mixed with plastic and cans) the crew would continue to collect the recyclables, but that the promotional material would set out the current arrangement for material separation.

Resolved, "That particulars of the report and discussion be noted on the minutes;

- i. That the kerbside service continues with the current receptacles and material separation as follows;
 - Green Box, mixed plastic and cans
 - Blue Box, glass
 - Bag or box, paper, white and grey card
- i. Additionally, when cardboard is introduced in mid-November following a communication campaign, householders are advised to recycle brown cardboard with paper and that additional receptacles be made available on request if required."

The Senior Engineering and Waste Services Manager was thanked for his attendance and left the meeting.

7	CAPITAL COST AND FUNDING SOURCE
Not applicable	
8	CHANGES TO REVENUE ESTIMATES AND FUNDING SOURCE
Not applicable	
9	STAFFING/HUMAN RESOURCES IMPLICATIONS
The Operating Procedure would give greater assurance to Kerbside crews in determining what is acceptable and reducing the risk from handling contaminated recyclables.	

10	LEGAL IMPLICATIONS
None foreseen. There is no legislation compelling householders to recycle in the Isle of Man.	
11	EQUALITY ACT COMPLIANCE
There is nothing within this proposal that breaches the equality act.	
12	COMPLIANCE WITH CORPORATE PLAN
<p>2.0 Delivery of Services to support the community and local economy</p> <p>2.3. Deliver quality services to support a vibrant diverse local economy</p> <p>2.3.3. Deliver an effective street cleaning and refuse & recycling collection service</p> <p>4. Environmental improvement</p> <p>4.4. Become an exemplar for environmental sustainability</p> <p>4.4.6. Continue to provide, promote and enhance the kerbside recycling collection service</p>	
13	BUSINESS RISK IMPLICATIONS
Adherence to the Operating Procedure will reduce the risk of injury to collection staff and ensure higher quality material is collected, where heavily contaminated and/ or unacceptable receptacles are rejected. Obviously, the rejection of any material brings its own risk, with complaints from householders and the potential of reputational damage, which is why it is believed that empowering the crews to make the decision reduces this risk, as they will seek to take all material, except where it is unsafe for them to do so, following dynamic risk assessment.	
14	ENVIRONMENTAL IMPACT
Whilst the Operating Procedure itself does not vary from existing arrangements, the reduction in contamination entering the recycling stream is a positive environmental goal.	
15	IMPLICATIONS FOR ECONOMIC DEVELOPMENT (of the City or Island)
No change to existing arrangement.	
16	CROSS-DEPARTMENTAL ISSUES
None foreseen.	
17	APPENDICES
Appendix 1 – Operating Procedure for Acceptable Receptacles for Households Using the Kerbside Collection Service	

18	REASON FOR CONFIDENTIALITY
Not applicable.	

REPORTING OFFICER	Head of Waste
RESPONSIBLE CHIEF OFFICER	Director of Environment & Regeneration
DATE	6th January 2024

Operating Procedure
for
Acceptable Receptacles for Households Using the
Kerbside Collection Service

09/12/24

Contents

1.0 Introduction

1.1 Purpose

1.2 Background Information

2.0 Operating Procedure

2.1 Scope

2.2 Material Streams

2.3 Key Considerations (2.3 – 2.6)

2.7 Exceptions

2.8 Action for rejected receptacles

3.0 Conclusion

1.0 Introduction

- 1.1 Purpose - The purpose of this Operating Procedure is to establish guidelines for acceptable types of receptacles to be used for recycling in the community to ensure consistency, efficiency, and compliance with recycling standards and to safeguard recycling staff from injury arising from poorly presented material on collection days.
- 1.2 Background information – the kerbside recycling service commenced in Douglas in 2008. Originally it was funded by Central Government as a 3-year trial and included Onchan and the Parish of Braddan. At the end of the trial in 2011, Douglas and Braddan both determined to continue with the service funded through rates. Initially all households were issued with two boxes: one green box containing plastic bottles (type 1 & 2), metal cans (Aluminium and Steel) and glass bottles, and a second blue box for paper. In the intervening years cardboard and type 5 plastic were added to the list of acceptable materials and households were offered additional boxes to help with the additional materials.

During the Covid19 pandemic in 2020 and as a non-statutory service, the Kerbside recycling collection was suspended with a phased reintroduction as the rules concerning lockdowns became more relaxed. During this time the Council adopted a new policy of three boxes (or recycling bags) per household which prescribed that glass should be placed in its own box separate from other materials, the change was supported by a communication campaign including social media, leaflets to households and information on the new recycling calendars.

As with all recycling policies, in the absence of specific legislation, the service remains voluntary, and it has therefore always been the case that a high degree of discretion was to be applied in the way households present their recycling in order to encourage and not disenfranchise participants.

Although not directly related to the reason for this report, it is worth noting that Waste Services presented a report to the Environmental Services Committee in July 2024 recommending a policy of four boxes per household so that all

material streams were to be presented in separate containers. Whilst sympathetic to the rationale behind the recommendation which had originated from front line staff, the Committee resolved not to adopt the policy but agreed that collection staff should be supported with having greater discretion to reject heavily contaminated boxes and in such cases the householder is to be notified of the reason why the box was not collected.

The Committee also acknowledged that householders were using non-issued recycling receptacles for their material, which had the potential to cause injury or at the very least was incompatible with the sorting process at the vehicle. On this basis the Committee has requested that guidance is produced identifying what is and is not acceptable. The boxes currently issued free of charge to households are universally recognised and comply with all health & safety legislation in terms of manual handling, which may not be the case with the householders on receptacles.

2.0 Operating Procedure

2.1 Scope - The following guidance will cover what material streams are collected and the importance of using suitable receptacles. It will set out the key considerations of what determines the suitability of a recycling receptacle, how to deal with rejected loads and finally where it is appropriate to make exceptions.

2.2 Material Streams currently collected as part of the Kerbside recycling service are:

- Paper including white and grey card
- Glossy magazines and pamphlets/leaflets
- Brown cardboard
- Types 1, 2 and 5 Plastic containers and bottles*
- Glass bottles
- Aluminium and steel cans

* Plastic categories and their typical uses

						
PET	HDPE	PVC	LDPE	PP	PS	0
Polyethylene Terephthalate	High-Density Polyethylene	Polyvinyl Chloride	Low-Density Polyethylene	Polypropylene	Polystyrene (Styrofoam)	Other Any plastic not 1-6
						
Used in: Water bottles Soda bottles Food containers Textiles	Used in: Detergent bottles Shampoo bottles Milk jugs	Used in: Piping Plumbing Window frames Rain gutters	Used in: Grocery bags Sandwich bags Garbage bags Bubble wrap	Used in: Straws Yogurt cups Packaging Medical devices	Used in: Product packing Shipping Food containers Insulation	Used in: CDs/DVDs Acrylic Nylon Fiberglass

2.3 Key consideration when selecting suitable recycling receptacles:

- Is it a proprietary receptacle i.e. is it designed for recycling?
- Is it part of a proprietary mobile stacked system i.e. recycling trolley?
- Does it have greater than 55L capacity?
- Does it have lifting handles?
- Does the box enable compliance with *BS5906:2005 part 1, 'Collection of Containers'*
- Can it be hooked on to the recycling vehicle?
- Can a cover or lid be attached to it?
- Is it durable?

In the case of recycling bags:

- Is it a proprietary bag?
- Are the bag contents easily and safely accessible?
- Is the bag made from sustainable materials i.e. not single use?

2.4 First and foremost, if the receptacle is a proprietary recycling box including a stacked trolley system. Then it is assumed that it is fit for purpose, provided it is in good condition. Proprietary systems will comply with relevant standards in terms of ergonomics, safe manual handling and be durable to weather

conditions. In addition, they will be manufactured with a lip, to enable the box to be hooked on the recycling vehicles whilst sorting. With regards to bags, the Council does issue proprietary recycling bags but these should only ever be used with single streams so they can be tipped in the vehicle compartment without needing to hand sort, thus avoiding the risk of injury from placing a hand where the content cannot be seen.

- 2.5 Whilst it is preferable that households only use boxes issued by the Council, provided that the homeowners' own box meets the above criteria then this should not be a basis to reject it. The potential problem arises when a privately owned box becomes damaged during the collection process, possibly because it is old and brittle or made from plastic other than polypropylene. In such cases the matter should be resolved by the householder receiving a new box.
- 2.6 In terms proprietary recycling trolley systems, the Council does not currently issue these to households. However, having previously collected recycling from Braddan ratepayers, the Council's recycling crews have handled these systems and whilst our experience is that they are inferior to the boxes issued by the Council, should one of these trolleys turn up on a Douglas round, there would be no reason to reject the materials.
- 2.7 Exceptions – Because of the lack of legislation and the associated enforcement powers compelling householders to adhere to rigorous rules regarding the presentation of recyclables, it remains imperative that collection crews are afforded sufficient autonomy to make decisions on the ground which includes deciding whether to collect material that is not presented in a Council issued box or bag. Typical examples of material presented that would normally be collected could include the following:
 - Flattened cardboard presented in a cardboard box
 - Plastic bottles presented in a transparent plastic bin bag
 - Any container where it is clearly apparent to the loader which material stream it contains, that it does not pose a risk and can be sorted or tipped with minimal adjustment to standard operating procedures and safe systems of work.
 - Use of non-issued boxes which may not be capable of being hooked on the vehicle but can be tipped directly in to the compartment
 - Allowing flexibility for seasonal spikes in material e.g. Christmas

Frequently situations arise where the householder will not have enough or indeed any issued boxes, such as new occupants or where the Council is waiting delivery for more boxes, in those situations householders are advised to separate all materials and place in bags or boxes until they have received their issued boxes. Again, the crews will use their judgement as to whether the material is sufficiently segregated, contaminant free and safe to handle.

- 2.8 Should a member of the recycling crew determine that the receptacle or its content does not meet the acceptable criteria set out above and it would be potentially injurious to treat as an exception, then the household should be issued with a notification card, this must be placed either in the rejected container or posted through the letter box.
- 2.9 The Card should stipulate why the receptacle was rejected and provide the contact details for Waste Services. In addition, the card should display a QR code which when scanned will take the householder directly to the Council's recycling collection video, which shows how boxes/ bags should be presented for collection.

3.0 Conclusion

- 3.1 It remains the view of Waste Services that wherever possible, households should be encouraged to use issued boxes and therefore a stock of recycling boxes should be always maintained.
- 3.2 However, it is also recognised that from time-to-time recyclables will be presented in non-issued containers which, more often than not, do not present any risk or require any meaningful change to standard operating procedures or safe systems of work. It is the view of the Waste Team that the

decision to accept or reject is left with the collection crew and that over regulation without any meaningful legislation could be counterproductive.

- 3.3 Where material contamination is evident, it would be a decision for the collector to determine whether the degree of contamination is unacceptable, and this would apply irrespective of the receptacle used. In such cases the householder must receive a card detailing the reason why the container was rejected.
- 3.4 Finally, where households continue to use non-issued boxes, crews are asked to report back to the office, so that the household can be added to the list of properties requiring boxes.