

Consultation on the Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales

15th February 2023

AVA response

The AVA supports the aims of the proposed legislation, in increasing the amount of waste being recycled and reducing the amount of unsold material being sent for waste.

Mae'r ADA yn cefnogi nodau'r ddeddfwriaeth arfaethedig, sef cynyddu faint o wastraff sy'n cael ei ailgylchu a lleihau faint o ddeunydd heb ei werthu sy'n cael ei anfon ar gyfer gwastraff.

Question 1: Please specify which sector you are representing:

- i) A business
- ii) A third sector organisation
- iii) A public sector organisation
- iv) Local Authority waste collection service
- v) A waste management company (e.g., private waste collector, waste handler, or re-processor, operators of incineration and co-incineration facilities, operator of landfill facilities)
- vi) **None of the above (please specify)**

The Automatic Vending Association (AVA) is the trade association of the vending industry, representing machine and ingredient manufacturers and suppliers, cup manufacturers and vending machine operating companies throughout the United Kingdom and Ireland. Vending operator companies in membership represent approximately 80% of the turnover of the vending industry in the UK.

Y Gymdeithas Gwerthu Awtomatig (AVA) yw cymdeithas fasnach y diwydiant gwerthu, sy'n cynrychioli cynhyrchwyr a chyflenwyr peiriannau a chynhwysion, gwneuthurwyr cwpanau a chwmnïau gweithredu peiriannau gwerthu ledled y Deyrnas Unedig ac Iwerddon. Mae cwmnïau gweithredwyr gwerthu sydd ag aelodaeth yn cynrychioli tua 80% o drostiant y diwydiant gwerthu yn y DU.

Question 2: How useful is the code in explaining the separation requirements?

- i) **Very useful**
- ii) Mostly useful
- iii) Some sections useful/others not so useful
- iv) Not very useful
- v) No use at all

We have no comments to make on questions 3, 4 and 5

Question 6: Do you find the inclusion of information about other complementary legislation operating alongside the regulations (e.g., duty of care) useful?

i) Very useful

ii) Mostly useful

iii) No opinion

iv) Not useful

Is there anything else you would like to see included?

We would like to draw attention to the proposed introduction of extended producer responsibility across the United Kingdom and, in particular, to the introduction of mandatory take back for paper drinking cups. It will be important that the volume of cups collected under the proposed legislation is recorded in order to be included in figures on recycling to be provided to the Scheme Administrator for Extended Producer Responsibility.

Hoffem dynnu sylw at y bwriad i gyflwyno cyfrifoldeb estynedig cynhyrchwyr ar draws y Deyrnas Unedig ac, yn benodol, at gyflwyno gorfodol i gymryd yn ôl ar gyfer cwpanau yfed papur. Bydd yn bwysig bod cyfaint y cwpanau a gesglir o dan y ddeddfwriaeth arfaethedig yn cael ei gofnodi er mwyn ei gynnwys mewn ffigurau ar ailgylchu i'w darparu i Weinyddwr y Cynllun ar gyfer Cyfrifoldeb Estynedig Cynhyrchwyr.

Question 7: Are you satisfied with the definitions provided in the glossary?

i) Yes

ii) No

iii) No opinion

If you have answered 'No', please identify how the definitions could be improved.

Question 8: Are you satisfied with the explanation of sub-fractions that should be placed into separate streams?

i) Very satisfied

ii) Somewhat satisfied

iii) Neither satisfied nor dissatisfied

iv) Not satisfied

If you answered 'iii' or 'iv' please explain why and what could be done to improve the clarity of this section.

Question 9: We propose excluding most sWEEE (apart from unsold sWEEE) initially from the separation requirements but intend to include them up to two years after the regulations come into force. Do you agree with this approach?

i) Yes

ii) No

If you answered 'No', what other approach would you like to see and why?

Question 11: We intend to include cartons in the metal and plastic stream. Do you agree this is the best stream to place cartons in?

i) Yes

ii) No

iii) Don't know

If you answered 'No' or 'Don't know', please explain why.

Question 12: Should this material stream (i.e., metal/plastic/cartons) also include 'other fibre-plastic composite packaging of a similar composition to cartons'? This wording is intended to capture materials such as rigid paper containers (for example packaging used for crisps) and cups used for hot drinks?

i) Yes

ii) No

iii) Don't know

If you answered 'No' or 'Don't know' please explain your reasons. Is there anything else that ought to be included?

The AVA believes that this approach will provide vital infrastructure necessary to increase the recycling of paper cups from vending. We recognise that 35% of vending cups are plastic and accept that, at present, these must be recycled through specific waste collection.

Enabling the collection of paper cups through segregated business waste collection will drive the success of the mandatory cup take back under EPR, providing access to large and small business alike. Paper cups are a valuable source of recycled fibre for which there is adequate paper mill capacity in the UK to accept all the cups currently used.

Mae'r ADA yn credu y bydd y dull hwn yn darparu'r seilwaith hanfodol angenrheidiol i gynyddu ailgylchu cwpanau papur o beiriannau gwerthu. Rydym yn cydnabod bod 35% o gwpanau gwerthu yn blastig ac yn

derbyn, ar hyn o bryd, bod yn rhaid i'r rhain gael eu hailgylchu drwy gasglu gwastraff penodol.

Bydd galluogi casglu cwpanau papur trwy gasglu gwastraff busnes ar wahân yn gyrru llwyddiant y broses adennill cwpanau gorfodol o dan EPR, gan ddarparu mynediad i fusnesau mawr a bach fel ei gilydd. Mae cwpanau papur yn ffynhonnell werthfawr o ffibr wedi'i ailgylchu y mae digon o gapasiti melinau papur ar ei gyfer yn y DU i dderbyn yr holl gwpanau a ddefnyddir ar hyn o bryd.

We have no comments on questions 13-16