

Review of Waste Services – Carmarthenshire County Council

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Summary report

Summary

What we reviewed and why

- 1 As a result of our Assurance and Risk work in 2019-20 we agreed with Carmarthenshire County Council (the Council) to undertake a review of its waste services for the following reasons:
 - from 2017-19 the Council's performance for the amount of waste it recycled, re-used, or composted declined.
 - In 2017-18 the Council achieved 63.6% for this measure and 59% in 2018-19 (against the Welsh Government statutory target of 58%). Its 2018-19 performance was almost 4 percentage points below the Welsh average across all 22 councils, and the Council's performance had declined from 66.2% in 2016-17.
 - In 2018-19 the Council was ranked 22 out of 22 amongst Welsh local authorities for its performance on recycling (PAM/030)¹.
 - in 2019-20, the Council improved its performance to meet the Welsh Government target of 64% by achieving 64.66% recycling. However, by 2024-25 the Council needs to achieve the next Welsh Government target of 70% recycling.
 - over the last five years (since 2015-16) the number of fly tipping incidents in Carmarthenshire has increased nearly fourfold. In 2015-16, the Council recorded 972 fly tipping incidents, and in 2018-19 recorded 3,516 which was more than all but one other council in Wales.
 - in 2018 the Council changed the status of the company it uses for waste disposal, CWM Environmental Ltd (CWM), from a Local Authority Waste Disposal Company (a LAWDC) to a teckal² company.
- 2 Our work reviewed whether the Council has in place proper arrangements to plan and deliver its waste services sustainably. As part of this work, we assessed the effectiveness of the Council's arrangements for governing CWM. We also looked at the impact of COVID-19 on the Council's waste service and the Council's performance on dealing with fly-tipping.
- 3 We undertook the review during the period December 2020 – April 2021.

¹ Public Accountability Measures (PAMs) are performance measures collected by Data Cymru.

² A teckal company is the common name for a company which benefits from contracts for works, services or supply from its controlling contracting authority without having to go through a competitive tender process. At least 80% of the activity of the teckal company must be for its public sector owner.

What we found

- 4 Our review sought to answer the question: Does the Council have proper arrangements to plan and deliver its waste services sustainably?
- 5 Overall, we found that: The Council has met its statutory recycling targets and has recently drafted a strategy to make its waste service more sustainable, but it has not finalised the strategy or got a clear plan for dealing with the large number of fly-tipping incidents in the county. We reached this conclusion because:
 - to date, the Council has met all the statutory recycling targets but has recognised that its current collection arrangements are not sustainable;
 - The Council's garden waste collection service has doubled its customer base in the last year and is helping to improve its recycling performance, but the service is not yet self-financing;
 - the Council's governance of its arm's length waste recycling company has improved since it changed its company model, but ongoing risks need to be more clearly identified and mitigated
 - the Council maintained a safe and effective waste service during the COVID-19 pandemic;
 - Carmarthenshire has a high number of reported fly-tipping incidents and, although the Council is taking some action, it does not have a clear plan to tackle the problem; and
 - the Council has recently drafted a waste strategy to make the waste service more sustainable but it needs to be finalised and funded.

Recommendations

Exhibit 1: recommendations

The table below sets out the recommendation that we have identified following this review.

Recommendations

Garden waste

- R1 The Council should identify performance measures for its garden waste service and ensure effective oversight of performance in this area by senior officers and Members.

Recommendations

CWM Environmental Ltd. (CWM)

The Council should:

- R2 ensure that there is a risk register for CWM.
- R3 ensure that it undertakes effective oversight of CWM's performance and associated risks, including at relevant committees such as overview and scrutiny.
- R4 develop a contingency plan for dealing with any consequences in the event CWM becomes financially unviable.

Fly-tipping

The Council should:

- R5 develop and implement an agreed plan to sustainably address the high number of fly-tipping incidents.
- R6 report corporately on a fuller set of performance measures for fly-tipping, including the number of incidents, to enable senior officers and Members to have more effective oversight of the problem and to drive improvement.

Waste Strategy

- R7 In finalising the waste strategy the Council should ensure that:
 - all elements of the 'waste hierarchy'³ are considered, including prevention;
 - it integrates the strategy with its other related projects and plans eg regeneration, enforcement, fly-tipping;
 - it has clear and sustainable plans for financing the strategy (including contingency plans if Welsh Government funding is not available);
 - it devotes sufficient time to consult the public on its proposed changes to waste collection arrangements; and
 - it develops and implements an engagement strategy focussing on the behavioural change required for the successful launch and adoption by the public of its new strategy (the Welsh Government Blueprint collection model)⁴.

³ The waste hierarchy sets out the order in which options for waste management should be considered based on environmental impact (see exhibit 9).

⁴ Welsh Government, **The Municipal Sector Plan (Part 1) – The Collections Blueprint**, March 2011. https://gov.wales/sites/default/files/publications/2020-03/municipal-sector-plan-part-1-collections-blueprint_0.pdf

Recommendations

Environment Department Business Plan

R8 The Council should review its Environment Department Business plan to ensure:

- it sets out clear accountable actions for its waste service which are specific, measurable and timebound; and
- it includes performance measures that are linked to the actions, and which have clear targets and success criteria.

Detailed report

The Council has met its statutory recycling targets and has recently drafted a strategy to make its waste service more sustainable, but it has not finalised the strategy or got a clear plan for dealing with the large number of fly-tipping incidents in the county

To date, the Council has met all the statutory recycling targets but has recognised that its current collection arrangements are not sustainable

- 6 The Council collects waste from approximately 91,000 households. The Council provides a fortnightly residual waste collection, a fortnightly co-mingled dry recycling collection, and a weekly waste food collection. The Council also charges for kerbside collections of bulky waste items and garden waste.
- 7 Since the Welsh Government introduced statutory targets for councils in 2012-13 relating to the percentage of the waste they collect that is re-used, recycled or composted, the Council has always exceeded those targets. However, the Council's performance dropped significantly from 66.2% in 2016-17 to 58.9% in 2018-19 (against a statutory target of 58%), which ranked the Council 22nd out of the 22 councils in Wales. The Council subsequently put measures in place to achieve the new 2019-20 statutory target of 64%, including:
 - a new Household Waste Recycling Centre policy (introduced from the 1 April 2019), which included residency checks, prohibition of commercial type vehicles and changes to centre opening times; and
 - increased restrictions on their black bag system and Household Waste Recycling Centre residual sorting controls (from 7 October 2019).

These combined measures enabled the Council to meet the statutory target of 64% by a narrow margin, achieving 64.66% and placing the Council 17th out of the 22 local councils in Wales.

Exhibit 2: Carmarthenshire County Council - percentage of waste re-used, recycled or composted 2012-2020

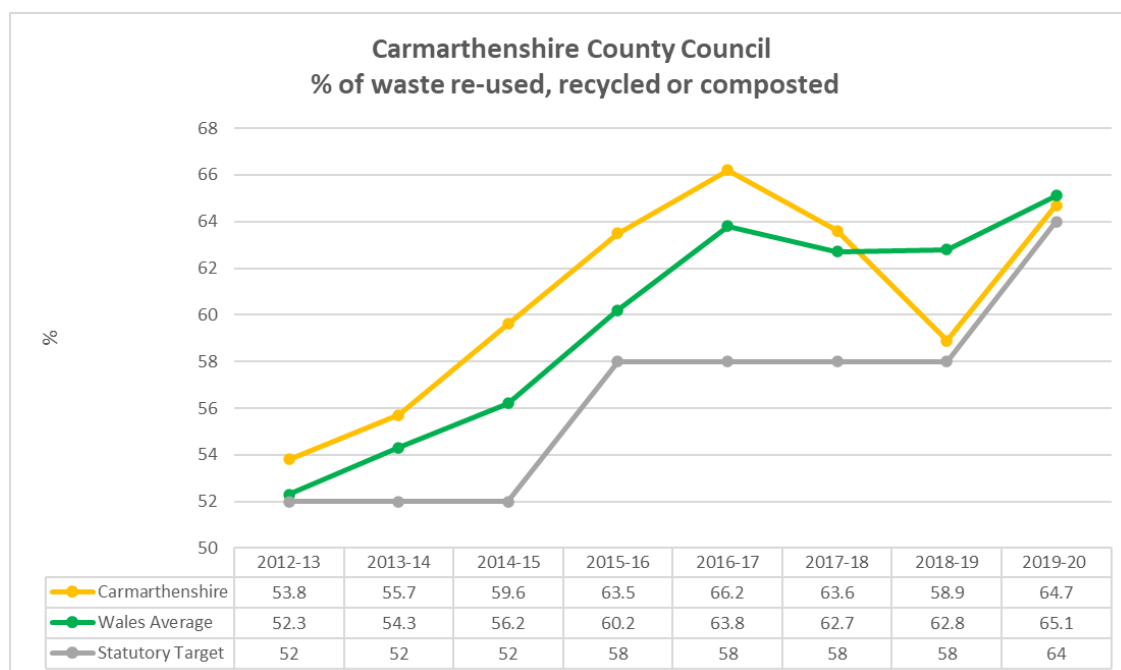
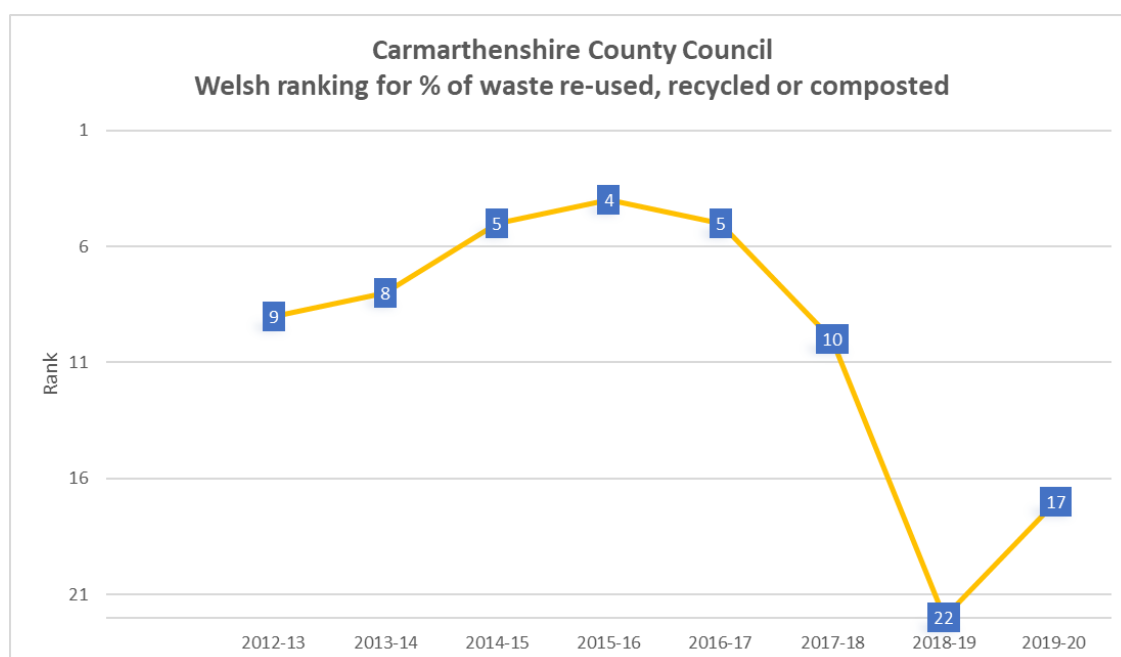


Exhibit 3: Carmarthenshire County Council Welsh ranking for percentage of waste re-used, recycled or composted 2012-2020



- 8 Currently the waste service is operating an alternative weekly collection methodology (dry recycling in blue bags on one week and residual waste in black bags on the following week). The service is experiencing a workload imbalance between the two weeks, with more blue bags being put out for collection on one week than black bags on the following week. This is positive in terms of residents' recycling behaviour change. However, the Council's operational arrangements are not yet aligned to residents' recycling rates. On recycling collection weeks the service is reaching its capacity without completing the full routes, leaving bags uncollected and leading to customer complaints.
- 9 The Council currently does not follow the Welsh Government Blueprint collection model⁵ of segregated kerbside collection of recyclable materials. Co-mingled collection causes higher contamination rates of recycled materials. The Blueprint waste collection model would reduce contamination. The Council recognises that for the waste service to be sustainable, a move to segregated kerbside collection would produce clean, dry, and uncontaminated material streams which would be easier for it to sell in UK markets.

The Council's garden waste collection service has doubled its customer base in the last year and is helping to improve its recycling performance, but the service is not yet self-financing

- 10 The Council has been running a garden waste collection service since 2006. It was introduced to improve its recycling performance and to provide such a service for Carmarthenshire residents. Initially, the Council collected garden waste in bags but now it uses wheeled bins which it collects fortnightly between March and October of each year. The Council's charge for this optional service is currently £48 per household per annum. All garden waste is processed at Nantycaws by CWM to produce 'Merlin's Magic Compost' which is available for the public to buy at the Household Waste Recycling Centres.
- 11 There were no clear success measures within the garden waste service business plan in 2017 (when the garden waste service moved to a wheeled bin collection) other than the need for it to become self-financing from year four onwards, predicated on having 4,500 subscriptions per annum. The number of garden waste customers has grown significantly during the pandemic from around 4,200 customers at the beginning of March 2020 to approximately 9,400 in April 2021. However, the garden waste service continues to run at a financial loss, although the shortfall is decreasing year on year. The shortfall in the 2020 collection season was £40,000. Despite the recent success in growing customer numbers, there is not a clear picture of when the garden waste collection service will become self-

⁵ Welsh Government, **The Municipal Sector Plan (Part 1) – The Collections Blueprint**, March 2011 https://gov.wales/sites/default/files/publications/2020-03/municipal-sector-plan-part-1-collections-blueprint_0.pdf

financing. Moving forward the service needs to determine what performance measures it intends to use to evaluate its success.

- 12 Garden waste added 1.7 percentage points to overall recycling rates in 2019-20 and is predicted to contribute about 3-4 percentage points in 2020-21.
- 13 An additional vehicle has been introduced for the 2021-22 season, which will allow further expansion of the service. The Council is hoping to attract a further 1,750 customers in the current season. The garden waste service is looking to make further changes in 2021 including:
 - developing and implementing an IT solution to allow for the efficient management and operation of the service;
 - reviewing collection rounds; and
 - moving to a zonal collection methodology to allow for a more efficient service and provide scope for an increased customer base.

The Council's governance of its arm's length waste recycling company has improved since it changed its company model, but ongoing risks need to be more clearly identified and mitigated

- 14 CWM Environmental Ltd (CWM) is a teckal waste and recycling company based in Carmarthenshire and is wholly owned by Carmarthenshire County Council. The company operates two materials recycling facilities at Nantycaws. Its black materials recycling facility seeks to recover recyclate from residual waste, that would otherwise go into landfill. CWM's blue material recycling facility seeks to maximise the recycling it collects from the mixed household recycling bags and commercial collections. CWM also runs four Household Waste Recycling Centres at Nantycaws, Trostre, Wern Ddu, and Whitland, and manages three waste transfer stations in Llanelli, Ammanford and Carmarthen.
- 15 CWM was originally set up by the Council as a Local Authority Waste Disposal Company (LAWDC) and the Council changed it to a teckal company in 2018. In order to have teckal status at least 80% of CWM's business over a three-year period has to be work undertaken for the principal shareholder, ie Carmarthenshire County Council. For the remaining 20% of CWM's business, it can undertake private work for other local authorities or businesses.
- 16 The Council decided to change CWM to a teckal company model because it believed it would give it greater involvement, control and flexibility in setting the strategic direction of the company whilst allowing it to run more commercially. The Council also felt that it would offer flexibility in service delivery to meet the requirements of future waste policy, and changes in the conditions of local markets and the economy. Since moving to a teckal company model, both CWM and the Council told us that this had also improved relationships and led to a better alignment of aims between them.

- 17 CWM is governed by the Company Board (which is made up of members of the company and officers of Carmarthenshire County Council). This Company Board reports to the Shareholder Board, on which sit other senior officers and Councillors from the Council. The Shareholder Board meets quarterly.
- 18 Before March 2021 there appears to have been limited oversight of CWM by formal committees of the Council, but the notes of the March 2021 meeting of the CWM Shareholder Board state that, 'in order to gain member oversight and to bring some consistency to the process, the Authority's arm's length companies will be required to present their business plan to the Preliminary Executive Board on an annual basis with an overview presented to the Executive Board on a 3-6 monthly basis.' As a result, CWM presented its 2021-24 business plan to the Council's Preliminary Executive Board on 19 April 2021. Although this is a positive step in increasing oversight and challenge by Elected Members, there is no evidence of CWM's performance being considered at scrutiny committee.
- 19 Between 2015 and 2019, CWM ran at a financial loss in excess of £2m. The worst performing year was 2018 when CWM's loss was £959,000. The Council, as 100% shareholder would be required to cover any financial losses, but to date this has not been required as CWM has drawn on its reserves. CWM has reduced its reserves from £5,513,000 in 2015 to £3,562,000 in 2019. In the current year the company is reporting a 10-month profit of £48,000 and is forecasting a 12-month profit of £360,000.
- 20 CWM faces a number of ongoing risks, including: remaining competitive in a volatile market for recyclates, retaining its workforce, and dealing with a potential claim for the harmonisation of terms and conditions of its staff. In its report establishing the new teckal company arrangement, the Council identified, 'The company will need to produce its own risk register and business risk profiling processes and demonstrate how risks are managed and mitigated. CWM Environmental Ltd will maintain its own separate risk register.' However, at the current time there is not a separate risk register for CWM. The Council is currently reviewing this. In addition to CWM having its own arrangements for effectively recording, mitigating, and managing risks, the Council also needs to ensure that it develops a contingency plan to deal with the potential of CWM becoming financially unviable.

The Council maintained a safe and effective waste service during the COVID-19 pandemic

- 21 In the Council's November 2020 report⁶ on the impact the COVID-19 pandemic had on its waste service from April to June 2020, it showed that whilst the county's municipal waste as a whole had fallen by 18.5% (compared to the same period in

⁶ Carmarthenshire County Council, '**Environment Department – COVID-19 Service Position Statement**', Report to Environment and Public Protection Overview and Scrutiny Committee, 24 November 2020

2019), the waste it collected at the kerbside increased by 20% overall, as more people were at home and the Household Waste Recycling Centre sites were shut for seven weeks during that period. The Council's analysis showed:

- 14% increase in kerbside residual waste (black bag);
- 34% increase in kerbside dry mixed recycling (blue bag);
- 35% increase in kerbside food waste;
- 83% decrease in Household Waste Recycling Centre residual waste; and
- 77% decrease in Household Waste Recycling Centre recycling.

- 22 The Council maintained a kerbside waste collection service throughout the pandemic in 2020 despite considerable service pressures, and introduced a number of controls and service changes to maintain the service, whilst aiming to keep the workforce safe.
- 23 During the pandemic in 2020, CWM supported the Council to maintain a waste collection service by supplying vehicles and a range of employees including drivers, crew, and cleansing staff. The Council also established a permanent pool of drivers, from across the Council, to help make the service more resilient.
- 24 During the first national lockdown (which started in March 2020) the Council suspended all waste education and door-to-door awareness schemes. Its environmental enforcement action was also suspended.
- 25 The Council introduced an online booking system for residents to book visit slots when it reopened the Household Waste Recycling Centres in May 2020. The Council told us the booking system was successful and popular with residents, but the Council has not yet decided if it will continue with the system post-pandemic.
- 26 On the 24 April 2021, there was a major fire at the Council's Nantycaws Recycling Centre when its blue bag materials recovery facility was destroyed. The Council and CWM moved swiftly to find alternative treatment facilities for the dry, mixed recyclate. Kerbside collection services continued with no disruption. The Household Waste Recycling Centre at Nantycaws had to be shut temporarily, but the opening days for the Whitland Centre have been extended as an alternative for the public.

Carmarthenshire has a high number of reported fly-tipping incidents and, although the Council is taking some action, it does not have a clear plan to tackle the problem

- 27 Fly-tipping is defined as waste that has been left that is too large to be removed by a normal hand-sweeping barrow⁷. In simple terms, a single full bin bag or more would constitute a fly-tipping incident. Councils are responsible for clearing fly-tipping that occurs on their land. There is a Public Accountability Measure for fly-

⁷ Welsh Local Government Association - Data Cymru, Public Accountability Measures (PAMs) 2019-20, Guidance for local authorities

tipping which is the 'average number of working days taken to clear fly-tipping incidents reported to the authority during the year' (PAM/035). At the time of our work, the latest all Wales data available was for the year 2018-19. The Welsh average days for clearing fly-tipping during this period was 2.2 days and for Carmarthenshire County Council it was 2.3 days.

- 28 The number of fly-tipping incidents the Council recorded in 2018-19 and 2019-20 was more than all but one other council. In the last five years, from 2015 to 2020, the number of fly tipping incidents in Carmarthenshire increased over four-fold. In 2015-16, there were 972 fly tipping incidents, in 2019-20 there were 4,111.

Exhibit 4: fly-tipping incidents by Local Authority 2018-19

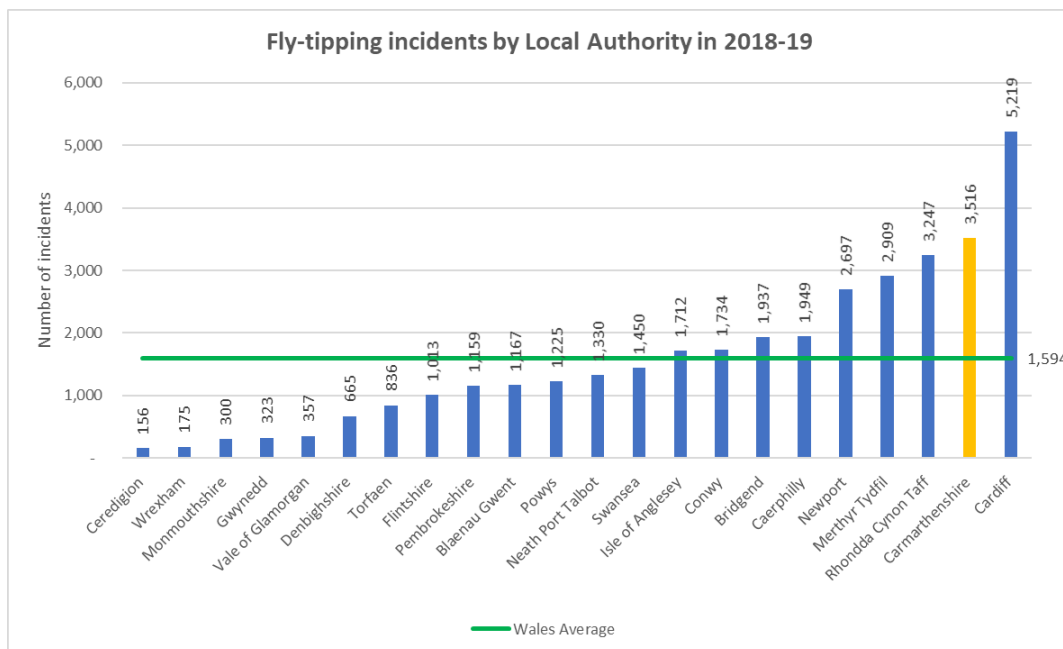


Exhibit 5: Fly-tipping incidents by Local Authority 2019-20

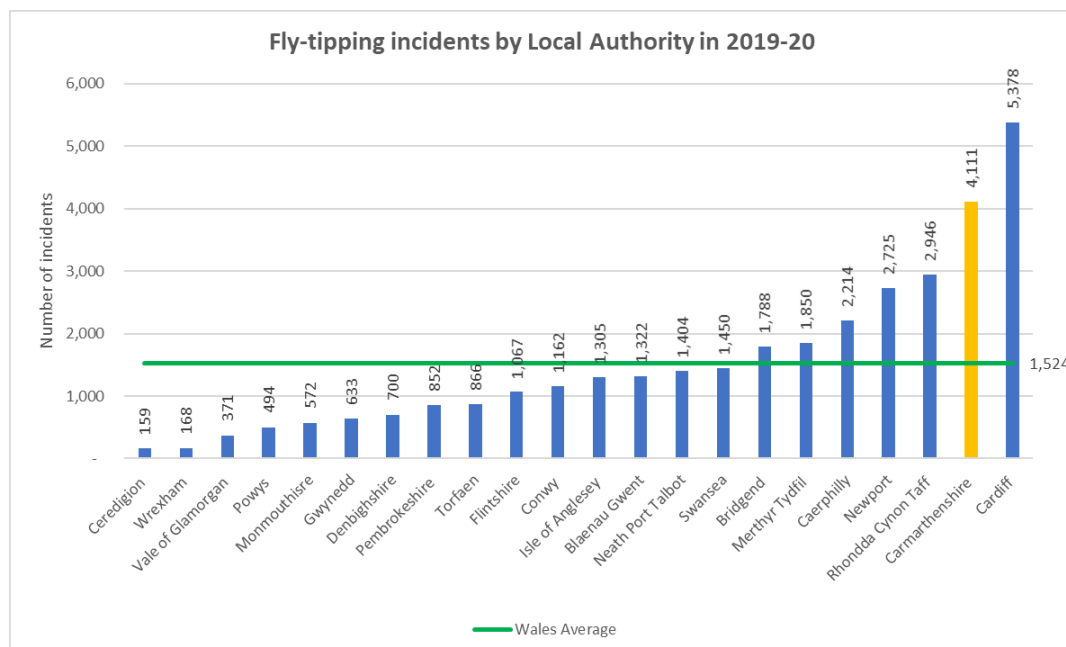


Exhibit 6: Carmarthenshire County Council Fly-tipping incidents 2006 – 2020

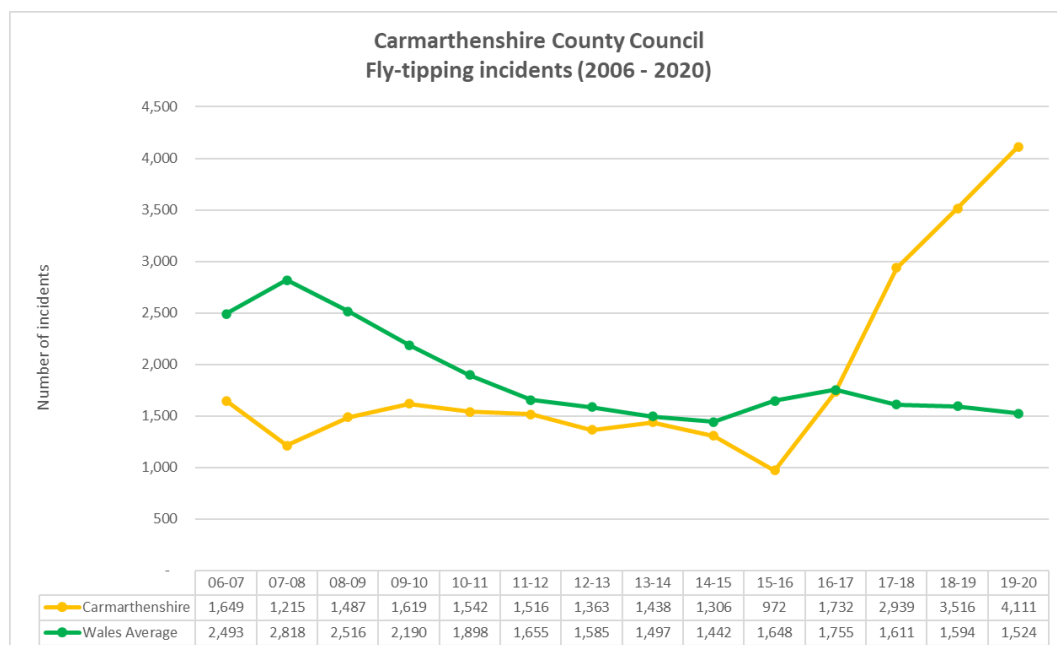
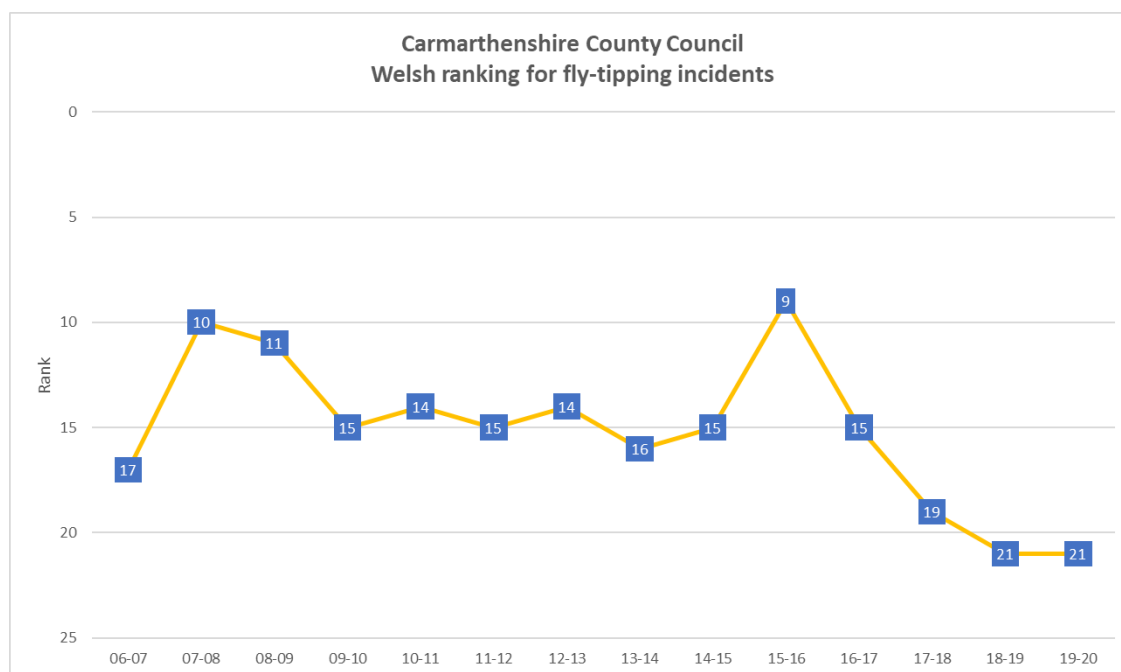


Exhibit 7: Carmarthenshire County Council Welsh ranking for fly-tipping incidents 2006-2020



- 29 The Council saw incidents of fly-tipping increase by 54% in April 2020 to June 2020 compared with the same period the year before. This coincided with the period relating to the first Covid pandemic lockdown in Wales, and the seven-week closure of the Council's Household Waste Recycling Centres.
- 30 In the period April 2020 to September 2020, the Council's performance for the number of working days taken to clear fly-tipping incidents was 6.4 days against a Council target of 2.5 days. The Council told us this was due to the fly-tipping service operating with restricted capacity, as people were redeployed to deliver other critical service functions. The Council anticipates performance against this measure will improve as services return to normal function.
- 31 The Council has stated that it wants to better understand the issues of fly-tipping in the county. It is using the data collection tools Flymapper and the Fix My Street app to collect information on fly-tipping incidents. The Council records all incidents it receives, both those reported by the public and those from its own Cleansing Team. The Council believes that one of the reasons why it has higher fly-tipping incidents than most other councils is because of the way it is recording the data (it does not think that all councils are recording the data in the same way, but it does not know).
- 32 The Council has undertaken some work in recent years to identify fly-tipping issues in the county which include: littering associated with fast food sites, side waste being left at bring sites and by public waste bins, issues in particular wards, and criminal commercial waste dumping.

- 33 The Council took the decision to shut Household Waste Recycling Centres to commercial waste by introducing vehicle bans and permits in April 2018. The Council told us it has plans to develop a commercial waste recycling facility in the future but has no such facilities currently.
- 34 The Council is undertaking some initiatives to help combat the issues of fly-tipping, including: use of CCTV, enforcement activity and the publicising of this, putting stickers on public waste bins to discourage people leaving side waste, and initiatives in specific wards. The Council also provides equipment for public litter picking events.
- 35 The Council has a multi-disciplinary enforcement forum in place that reviews all enforcement related activity. This team has recently recognised the need to reflect on its purpose and redefine its direction, with the aim of better addressing long-standing enforcement issues across the county.
- 36 The Council started a cleansing review to understand the fly-tipping hot spots, with the aim of using this information to inform the new Local Environmental Quality Strategy. However, work on this is currently suspended. Although some initiatives are taking place to tackle fly-tipping the Council currently has no clear plan to fundamentally address the root causes of the county's fly-tipping problem.
- 37 In the Council's Environment Department Business Plan 2020-23 there is one action related to fly-tipping, 'Continue to target local environment quality issues, including dog fouling, fly-tipping and general litter blight'. There are no specific actions within the Business Plan to understand the root cause of fly-tipping, or to reduce the number of related incidents. The only measure provided in the Business Plan is the Public Accountability Measure to measure 'the average number of days taken to clear fly-tipping incidents'.
- 38 The Council's oversight of its performance on fly-tipping is limited. Members and senior offices receive reports relating to the number of days taken to clear fly-tipping incidents. However, the Council does not report the actual number of fly-tipping incidents or its relative performance against other councils. Consequently, there is little awareness amongst Members of the scale of the issue to enable them to effectively manage, scrutinise and consequently improve the Council's fly-tipping performance.

The Council has recently drafted a waste strategy to make the waste service more sustainable but it needs to be finalised and funded

- 39 The Council recognises the need to make wide-ranging changes to its waste service to achieve its ambitions as set out in its Corporate Plan⁸ and to sustainably improve the performance of its waste service to meet the Welsh Government's 70% recycling statutory target for 2024-25 (and any possible future higher targets).

⁸ Carmarthenshire County Council **Corporate Strategy 2018–2023**, refreshed June 2019

- 40 In 2019, Welsh Government asked WRAP⁹ Cymru to engage with all councils it identified at risk of failing to meet the 2019-20 targets, which included Carmarthenshire County Council. The Council is continuing to work with WRAP Cymru through the Collaborative Change Programme to review its future waste collection methodology. Currently the Council is one of only five councils in Wales that still uses a co-mingled recycling collection. It is the only Council in Wales that does not offer a weekly dry recycling service or collect glass at the kerbside. It is therefore developing a business case for Welsh Government to consider for the longer-term waste service change, based upon the Welsh Government's Blueprint waste collection model.
- 41 In early 2021 the Council drafted a waste strategy, 'Future Kerbside Waste Collection Strategy 2021-2030', which sets out its new proposed waste collection methodology. The Council's draft waste strategy proposes a phased approach to changing its waste collection arrangements. The draft strategy proposes:
- From September 2022 to February 2024 the Council will move to an interim model of weekly dry recycling collection, a three-weekly residual waste collection, and introduce a three-weekly kerbside glass collection.
 - From March 2024 the Council aims to introduce the Welsh Government's Blueprint waste collection model, with weekly collections of glass, food waste and segregated dry recyclables.

Exhibit 8: Carmarthenshire County Council, 'Future Kerbside Waste Collection Strategy 2021-30,' proposed timeline, page 29

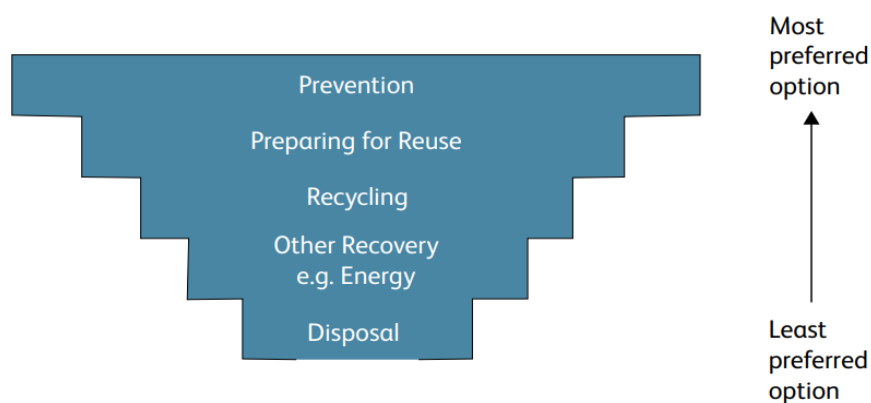


⁹ Waste and Resources Action Programme (which operates as WRAP, a registered UK charity). It works to achieve a circular economy by reducing waste, developing sustainable products, and using resources in an efficient way.

- 42 The Council is confident it can fund the interim phase from internal resources but has identified it will require additional capital financial support from Welsh Government to move to the Blueprint waste collection model. However, should this funding not be forthcoming the Council will need to agree how it funds the complete move to the full Blueprint model to achieve its strategy and corporate ambitions.
- 43 The Council recognises the need to focus on the significant resident behavioural change required for introducing the new waste collection arrangements. However, at the time of our review it had not yet consulted the public, and did not have an engagement and communications strategy in place to facilitate and support a smooth transition from the current arrangements to any interim and final waste collection models.
- 44 In making the move to the Blueprint model, the Council should look to learn from the other councils in Wales that have already implemented the model.
- 45 The pressures of the Covid pandemic on the Council has naturally delayed its pace in progressing the development of the draft waste strategy. It is now picking up the pace but the delay has left the Council with challenging timelines to make significant service changes. Its ambition is further complicated by the lack of certainty over future funding from Welsh Government. The Council is currently looking to increase staff capacity to help develop and deliver the new strategy by recruiting a project manager for a four-year period.
- 46 Although the Council's draft waste strategy is titled, 'Future Kerbside Waste Collection Strategy 2021-2030', it also includes the Council's plans in relation to promoting the circular economy and developing the Nantycaws Ecopark. It includes reference to the Council's plans to develop repair and re-use centres at the Nantycaws site and in Llanelli town centre. The Llanelli site will allow people to buy items at affordable prices whilst enabling items to be re-used that which would normally be thrown away.
- 47 The Council and CWM have ambitious plans for the development of the Nantycaws site as an ecopark and strategic waste facility. These plans include:
- the creation of a centralised depot for the Blueprint waste collection model;
 - the construction of circular economy projects including a re-use village, paint re-use facility, and commercial recycling centre;
 - the production and distribution of energy from solar, wind, and waste;
 - commercial units for industrial use; and
 - the creation of ULEV vehicle recharging and refuelling infrastructure.
- A key element to progressing the plans for the Nantycaws site is the development of the existing road infrastructure. The Council and CWM are in discussions with Welsh Government about improving the road junction on the A48, however, currently there is no guarantee of funding from Welsh Government for the road improvements.

- 48 The Council has been successful in achieving recent funding from Welsh Government for a range of circular economy projects. The Council's focus up to now has been on recycling and re-use, largely as a result of the Welsh Government statutory targets for the percentage of waste re-used, recycled, or composted. There is an opportunity for the Council to do more work on waste prevention going forward. The Council may wish, therefore, to consider more closely aligning its draft strategy to the priorities in the waste hierarchy¹⁰.

Exhibit 9: Welsh Government, Towards Zero Waste, 2010, The Waste Hierarchy, page 16



- 49 The Council's Environment Department also has a business plan which outlines the actions it intends to take during the year in relation to its waste services and the changes it plans to make to its collection arrangements. Not all of the actions are specific, measurable or timebound, or are directly linked to the measures in the business plan. This lack of alignment makes it difficult for the Council to monitor progress or know when actions are complete and outcomes have been achieved.

¹⁰ The waste hierarchy sets out the order in which options for waste management should be considered based on environmental impact.



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