

What does COVID-19 mean for household waste recycling centre (HWRC) operations?

This document seeks to set out, in a clear and structured way, the considerations that SUEZ believes are necessary with regard to the regulatory conditions around, and need for, HWRC opening, as well as some of the practical issues of self-distancing when applied to HWRC layout and operation.

SUEZ is working with government, regulatory agencies, trade associations, staff and customers in seeking to ensure that during this time of crisis, it can maintain critical essential services and keep its staff, its customers staff and members of the public safe.

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Can Service Users come to the household waste recycling centres and comply with legislation?

The Health Protection (Corona, Restrictions) (England) Regulations 2020 (“the Restrictions”) are now in force.

These were enacted after the government declared, under the Health Protection (Coronavirus) Regulations 2020 (“the Regulations”), that Coronavirus constituted “a serious and imminent threat to public health” and enacted the restrictions as an “effective means of delaying or preventing further transmission of the virus”.

It is unlawful to provide a Service that does not comply with the restrictions or to encourage others to breach the Restrictions.

Under the Restrictions, no one can leave their home without Reasonable Excuse. The Restrictions include prescriptive examples of Reasonable Excuse, including:

- ▶ to obtain basic necessities
- ▶ to access critical public services

Other than for Reasonable Excuse, no one may leave their home. Only the two examples of Reasonable Excuse above seem pertinent to waste services.

Waste services do not constitute obtaining basic necessities, they are a service and not an object.

Attending a household waste recycling centre (HWRC) could be considered the “accessing of critical public services” and therefore a Reasonable Excuse, but only:

- ▶ if the service was a compulsory service; and
- ▶ only if the service was not being provided in another form.

This interpretation means that only if residual or food waste did not have a collection regime (of whatever infrequency) would it be lawful to open an HWRC under the current Restrictions.

Can an HWRC, if opened, be operated in a manner consistent with the Regulations and Restrictions, government guidance and in a safe manner?

Social distancing – onsite

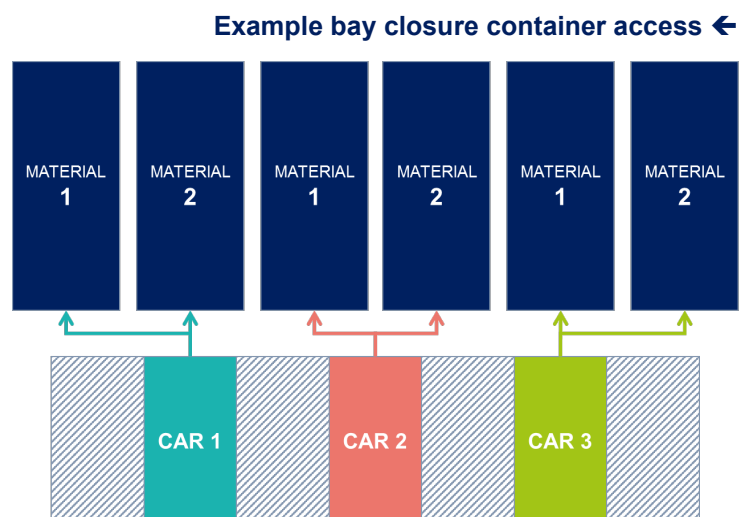
A core purpose of the government strategy for preventing further transmission of Coronavirus is social distancing. This requires service users only to use HWRCs as a last resort (see above section) and, when using HWRCs, to use them in a way that minimises transmission risk.

Most HWRCs are not set up to keep people separated. In fact, most require service users to move varied materials from a vehicle to multiple points on the site using walkways and paths that are designed to channel people together into safe zones to protect the public from other moving vehicles.

Parking bays are often maximised to make the service as efficient as possible and to allow the maximum number of the public and their vehicles on site as can be safely accommodated. Further, our staff are trained and employed to help the public with their waste, either through advice or through physical assistance, and service users may (and throughout the day some will) need assistance.

In a COVID-19 operation, we would expect the following to be necessary (and may not achieve a safe service):

- 1 The number of car parking bays would need to be reduced.** On the basis of a two-metre degree of separation, that would mean only every other bay would be used, with the adjacent two being closed off to maintain separation. As such, traffic throughput would be reduced by 50-66% depending on the site layout. Some sites, especially the smaller sites, may not be able to accommodate social distancing at all and would therefore not meet safe requirements to re-open.
- 2** As sites are designed to channel the public into safe areas to walk, it's likely that the site would need to **significantly reduce the number of containers available.** For instance, if we close adjacent parking bays, then one car could only access the two bins/containers that matched with their allocated bay (see diagram). If this rule was not applied, then site layout and public movement controls would need to be implemented to maintain social distancing.



As such, most sites would only be able to support the deposit of two types of waste or would need to further significantly reduce public activity to prevent breaking social distancing rules. Were the public to bring items to the site that were not being accepted, they would need them to keep them in the vehicle and take them home. This will no doubt lead to frustration and a probable uplift in fly-tipping. Clear communications will be required to seek to avoid this.

3 In many sites, **trade waste is not accepted, is constrained or is subject to charges**. Further, trade waste may well comprise materials significantly different to materials disposed of by the public. Given the constraints on access and materials accepted outlined above, it's likely that a proportion of any trade waste brought to a site will be unacceptable and therefore will need to be taken back by the tradesperson. This would also lead to frustration and a probable uplift in fly-tipping. Clear communications will be required to seek to avoid this.

4 **It would not be possible for our site staff to assist the public with heavy or bulky items** and as such it would probably be necessary to preclude the public from bringing heavy items or bags to the site that cannot be lifted by a single person (likely a maximum of 25kg per item or bag). If they did bring items which they could not lift, our staff would not be able to assist and the public would be asked to keep the items in their vehicle and take them home.

Even if the 25kg limit were met, if staff considered that a Service User couldn't manage that weight on their own (including, in many sites, throwing the item over the side of gantries), the item would have to be rejected and the Service User asked to take it home.

In either case, this would also no doubt lead to frustration and a probable uplift in fly-tipping. Clear communications will be required to seek to avoid this.

5 **Staffing levels at HWRCs would need to be reviewed** to ascertain available staff and the uplifted requirements of public management on site. In many areas, key staff from HWRCs (and associated logistics) have been moved or seconded to support kerbside collection of waste or other facilities.

Should the sites be required to open, these staff would then be required to return to HWRC operations and denude those essential kerbside collections. During this time, the number of available staff is likely to be reduced by virus infection or precautionary self-isolation. As such, there may not be enough staff to operate all the sites safely and the number of sites that could be supported would be reduced. Furthermore, drivers will be required for any mobile plant and to move and transport full containers to their point of treatment. In many areas, these very same drivers are also helping keep the essential kerbside services working.

6 **To protect staff working on the sites**, it will necessary to ensure they have the ability and equipment to frequently wash or sanitise their hands and to provide them with appropriate PPE, including where necessary, face masks. Before any site opens, new temporary operating procedures will need to be defined and staff trained, new temporary markings and signage established, and adequate supplies of PPE equipment sourced.

Social distancing – offsite

HWRC sites are designed around deliveries by vehicles. Many sites experience issues of congestion and queuing on adjacent public roads at peak times – this was demonstrated on many sites during the weekend before “the lockdown” and often occurs during bank holiday weekends. HWRC staff have no jurisdiction on public roads outside their sites and rely on passive controls (street marking and signs) or public or emergency services to manage issues when they arise.

Seeking to re-open HWRCs in the current crisis is likely to lead to:

- 1 Increased attempts to use the sites**, partially as a result of many of them having been closed and therefore there being a pent-up demand but, most probably and more importantly, as people have been at home and may well have been undertaking projects that generated more waste in general. Sites are likely to see higher demand than normal, at the same time as the sites are more constrained than usual. This will undoubtedly lead to queues outside the sites and may lead to frustration, fly-tipping and increased risk that social distancing rules will not be followed.

In addition, it's probable that some queues may need emergency or council service intervention to resolve, to keep the peace, or to maintain access for emergency and essential services, attending calls or their work locations.

- 2 Methods to mitigate an immediate rush to HWRCs**, such as devising systems of controlled management for the public, by collection round or postcode will, in many instances, require new systems, new communications and new on-site management. Systems to manage access and therefore demand at source are unlikely to be quickly or easily delivered and may well divert resources from key worker tasks or the delivery of essential kerbside collections.

Summary

Whilst essential kerbside collections continue, under the current legal framework a visit to the HWRC is not a Reasonable Excuse for a Service User to leave their home and will increase the risk of increased virus transfer.

Should sites reopen, and in order to maintain safety for staff and users of the HWRC sites, it will be necessary to design and implement new temporary methods of working, to provide new temporary markings and signage, and to communicate with householders and others. These will need to manage traffic and people movements within the site and will require constraint on the range of materials that can be accepted.

Re-opening sites will often demand resources to be withdrawn from supporting essential kerbside collections and will be of limited use even if it can be achieved. With constrained capacity at HWRCs, it is likely that queues of traffic will form, leading to frustration and potential increases in social contact and fly-tipping. Further traffic queues outside sites may also require the intervention of council or emergency services, taking them away from key COVID-19 related duties.

Given the constraints and complexities, HWRC re-opening would have to be on a case-by-case basis even in the event of compulsory kerbside collections being substantially withdrawn.

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