

## Resources and Public Realm Scrutiny Committee

16 July 2025

# Report from the Corporate Director of Neighbourhoods and Regeneration

Cabinet Member for Public Realm and Enforcement (Councillor Krupa Sheth)

### **Update on Recycling in Brent**

Wards Affected:	All		
Key or Non-Key Decision:	N/A		
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open		
List of Appendices:	Appendix A – Integrated Street Cleansing, Waste Collections and Winter Maintenance		
Background Papers:	None		
Contact Officer(s): (Name, Title, Contact Details)	Rashmi Agarwal – Head of Service Development & Contract Performance, Public Realm, Neighbourhoods & Regeneration Rashmi.Agarwal@brent.gov.uk		

#### 1.0 Executive Summary

- 1.1. The purpose of this report is to provide a comprehensive overview of the council's recycling performance by waste type (food, paper and card, dry mixed recycling, Garden Waste) and service delivery.
- 1.2. This report provides background information on recycling performance data since the start of the contract in April 2023. It highlights the recycling finances and improvements made including partnership and communications initiatives.
- 1.3. This report also provides an overview of 'Simpler Recycling' expectations and upcoming legislative reforms over the next few years.

#### 2.0 Recommendation(s)

- 2.1 It is recommended that the committee note the contents of this report.
- 2.2 It is recommended that the committee note improvements made to recycling collections since the introduction of the twin-stream recycling service in October 2023, and Brent's compliance with Simpler Recycling legislation.

#### 3.0 Detail

#### 3.1 Contribution to Borough Plan Priorities & Strategic Context

Brent's Borough Plan sets out how we can achieve one of our strategic priorities "A cleaner, Greener Future", with the objective to future-proof the Borough to bring about positive changes to keep the environment clean and develop our services to residents. Waste and Recycling performance has a direct link with the Borough's aim to reduce the overall proportion of household waste being generated by encouraging more recycling and promoting reuse of items. The Simpler Recycling reforms mandate separate collection of paper and card, and food roll out to all properties in Brent by 2026. By having the back-end systems / processes in place, we can collect more types of recyclable materials.

- 3.1.2 One of the desired outcomes of our Climate & Ecological Emergency Strategy is to tackle climate change by reducing consumption, resources, and waste. A key factor in helping to achieve this outcome is to reduce carbon emissions from the disposal of recyclable packaging.
- 3.1.3 Effective waste collection systems that promote more sustainable waste management help change behaviours and create better environmental outcomes and particularly support the council's climate action programme.

#### 3.2 Background

- 3.2.1 Veolia previously provided Brent with a holistic service for waste, recycling, street cleansing, winter and grounds maintenance service up until March 2023. As part of the Borough's Redefining Local Services (RLS) programme which aimed to have:
  - A specialist contract approach for outsourced services
  - Improved contract management and monitoring for contracted services
  - An intelligence-led approach to the deployment of resources
  - Better digital customer interface with real-time information and issue reporting
  - A neighbourhood approach to managing local issues to meet the needs of local areas
- 3.2.2 A rigorous procurement exercise was carried out reviewing the arrangements in place under the old Veolia contract and ensuring the tender process brought in some efficiency savings whilst maintaining similar levels of service. At the time it was deemed that the Council could benefit by splitting up the core components from the previous Veolia contract and procure these services with other providers. As a result, the Council now has one main contract and several small contracts in place in partnership with West London Waste Authority (WLWA) to manage its waste, recycling, street cleansing and winter maintenance services. The new Integrated Street Cleansing, Waste Collections and Winter Maintenance contract commenced on 1 April 2023 as an 8-year contract with Veolia Environmental Services, with a potential for extension for another 8 years. The other small contracts related to waste are listed below:

Provider	Contract	Commencement Date
WLWA (N+P)	Recyclates reprocessing	01 April 2023
WLWA (Edwards)	Paper and Card reprocessing	01 October 2023
WLWA (AnyJunk)	Bulky Waste collections	01 April 2023

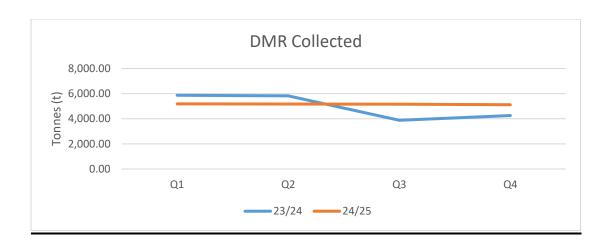
- 3.2.3 Some other key changes introduced from 1<sup>st</sup> April 2023, were to our recycling service. The first major change was the switch in our recycling processor from Veolia's Southwark Material Recovery Facility (MRF) to N+P's MRF. Another key change was the introduction of twin stream fibre recycling from 1<sup>st</sup> October 2023, which involved the segregation of paper & card from the rest of the recyclable materials residents were putting in their recycling bins. To facilitate the separate collections of these materials, the blue sacks were introduced as a cost-effective container solution. The rationale behind this change was that if the Council could extract cleaner paper & card from the waste stream, we would have the opportunity to get more income from the on sell of the material.
- 3.2.4 There were initial challenges with the introduction of blue sacks, with a high volume of queries/complaints received about the sacks and reports from residents about having difficulties in adapting to this new change. Since the start of the service in October 2023, we have seen a significant reduction in the number of queries and complaints received regarding the blue sacks. A recent survey carried out by the team indicates blue bag participation levels are at 80% and our paper and card tonnage has returned to previous levels.
- 3.2.5 In addition to twin stream fibre recycling, we also introduced a small items recycling collection service at the same time. This service is a free bookable service allowing our residents to recycle batteries, small electrical items and textiles to be collected from their doorsteps.
- 3.2.6 The twin stream recycling service changes are now fully embedded, and we are in the third year of contract's operation. We have seen improvement in our recycling tonnage and a reduction in levels of contamination and improvement in the quality of paper and card collected.

#### 4.0 Recycling Performance Overview

4.1 A breakdown of recycling tonnages by waste type (e.g. paper and cardboard [blue sacks], food waste, garden waste, and other recycling [blue-lidded bins]) is provided below.

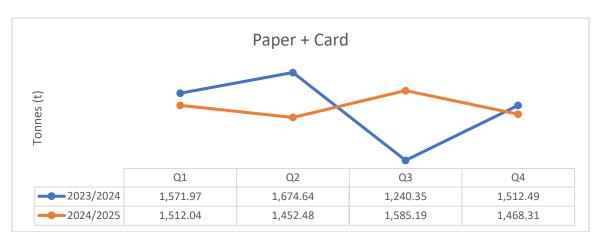
#### 4.2 Dry Mixed Recycling (DMR)

When comparing our collection figures from 23/24 to 24/25 financial year we can see that overall DMR collected tonnage has improved by 4.07%. One of the main factors to this is the reduced number of rejected loads resulting in a higher tonnage processed.

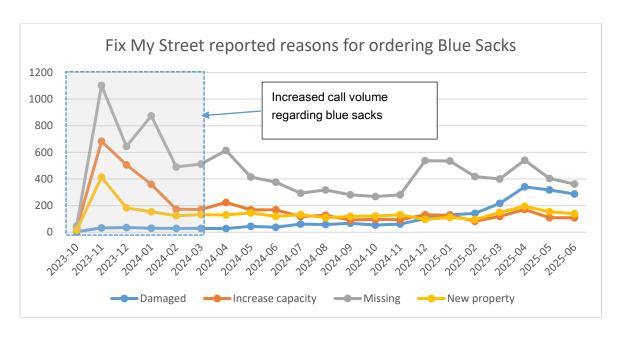


#### 4.3 Paper and card (Blue sacks)

From the graph below we can see there is a small statistical difference in Paper and Card tonnage collected from 23/24 (total 5,999.45 tonnes) to 24/25 (total 6018.02 tonnes). We have seen that our paper and card contamination has been very low. There is a 52.2% decrease in contamination compared to previous year.



From data gathered from Fix My Street reports we can see that since the service change in October 2023; 18,652 blue sacks have been ordered. The most recorded reason for a new sack was due to them going missing. From the graph below we can see that in the first 3 months of the blue bag scheme (October to December 2023) there were high numbers of reported missing blue sacks. From February 2024 the amount of reported missing blue sacks decreased into a consistent pattern.



Our contact centre telephone data shows a total number of 227 calls received in the first six months of the roll out of blue sacks. Since the start of service, the call volumes have gone down significantly. The table below provides a snapshot of call volumes for recent months.

Month	Count
10-2024	25
11-2024	31
12-2024	41
01-2025	47
02-2025	28
03-2025	28
04-2025	6
05-2025	7
06-2025	6

#### 4.4 Garden Waste

Garden waste has a very seasonal trend due to the nature of the waste. We can see that the negative correlation from Q1 through to Q4 as we go from summer to autumn. There are other variables i.e. total garden waste subscriptions which affects our garden tonnage. As of April 2025, our garden waste subscription cost increased to £69. We are about 800 members down when compared to same time last year. We are confident that subscriptions will pick up as we go further into the year. We will monitor to see if the price increase causes any change to our total number of subscription and tonnage collected.



#### 4.5 Food Waste

Collected food waste has seen a 6.9% improvement from the previous financial year. This is due to recent roll out of food waste collection from flats and some communal blocks. Waste and Recycling officers has also carried out further promotion to kerbside properties.



#### 4.6 Brent Recycling rates comparison with neighbouring authorities

At the start of new contract in April 2023, our recycling rounds for both communal and kerbside were mixed. It was in October 2023 that communal recycling rounds were separated to improve contamination in recycling going to our processor. After separating the communal rounds, we sent our communal recycling to the processor and it did not meet processors acceptance threshold due to high level of contamination. Therefore, all communal recycling is currently being sent as residual waste to be incinerated. However, we have started to recycle Food Waste for certain communal properties. Waste composition analysis has taken place to determine whether contamination has decreased as we work on improving recycling behaviour amongst

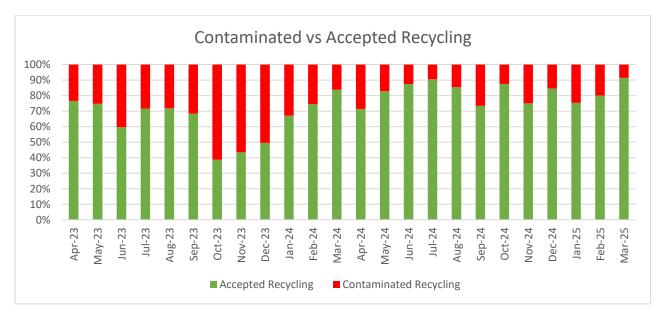
our residents as well as improving infrastructure at targeted communal sites. Hence, it is not possible to provide comparative recycling data for kerbside and communal properties. In addition, due to the complexity of Veolia vehicle rounds, it is not possible to obtain recycling data by ward or areas.

The table below shows recycling rates in comparison with neighbouring boroughs. We can see that Brent has a strong upward trend, improving from 24.8% to 33.8% (+9%), highlighting the work that has taken place within the borough. This has affected our recycling rate positively. Please note that Q4 is still under review but should continue the positive trajectory.

			Q3	Q4 Recycling	Q1 Recycling	Q2 Recycling	Q3 Recycling	
Authority	No. Households	Total Population	Recycling Rate 23/24	Rate 23/24	Rate 24/25	Rate 24/25	Rate 24/25	Averag
Barnet LB	159,470	389,101	26.7%	25.3%	30.2%	29.6%	26.9%	27.89
Brent LB	135,310	341,221	24.8%	27.0%	31.9%	34.1%	33.8%	30.39
Camden LB	113,410	218,049	29.7%	27.9%	28.0%	26.4%	28.1%	28.0
Ealing LB	148,480	369,937	50.0%	48.4%	49.0%	51.7%	49.0%	49.69
Harrow LB	96,510	261,185	31.6%	28.2%	32.7%	32.9%	29.2%	30.99
Hillingdon LB	118,350	310,681	36.1%	32.1%	41.1%	39.6%	35.2%	36.89
Hounslow LB	110,290	290,488	37.3%	35.3%	37.8%	38.7%	NAN	37.3

#### 4.7 Contamination levels

From the graph below we can see a sharp increase in contaminated waste in October 2023 with the introduction of separate collection of paper and card. However, this has steadily decreased from 33% of our total recycling being rejected in 23/24 to 17.9% in 24/25.



The below table shows data for the last two years of rejected loads from our recycling processor, N+P

No. of Rejected	23/24	24/25
Load		
Q1	84	28
Q2	81	25
Q3	74	26
Q4	37	27

#### 5.0 Recyclates Finance Summary

5.1 For the first year of the Integrated Street Cleansing, Waste Collections and Winter Maintenance contract, Brent sent 19,823 tonnes of recycling for processing. That tonnage consisted of 13,823 tonnes of Co-mingled material and 5,999 tonnes of paper and card. In 2024/25 a total of 20,629 tonnes of recycling was sent for processing with 6,018 tonnes of that consisting of paper and card. Whilst tonnages remained similar, a lot of work was done with customer engagement, education and contract monitoring to achieve higher rebate values. The table below compares the first 2 years of the new contract.

Year	Total Tonnage Collected	Co-mingled collected tonnage	% Co- mingled downgraded	Paper & Card collected Tonnage	% Paper & Card Downgraded	Processing costs	Rebate
2023/24	19,822	13,823	23%	5,999	0%	£2,270,173	£493,364
2024/25	20,629	14,611	18%	6,018	0%	£1,555,804	£739,926

- 5.2 In 2023/24, 33% of recyclable material collected was downgraded upon arrival at the processor. Considering the high percentage of rejected loads, specific measures were introduced with a focus on trying to get better quality material to the reprocessor. This can be seen in the decrease in processing costs for 24/25. This in turn helped the Council to achieve a higher rebate value.
- 5.3 Whilst we are recycling more of our material than we have previously, our rebate values are largely dictated by market material prices, which are out of our control. The below table highlights 3 different material types which have experienced the largest movements in terms of unit price.

	Aluminium Cans		Pot, Tubs and Trays		PET	Clear
Year	High	Low	High	Low	High	Low
2023/24	£17.22	£6.41	£4.61	-£0.67	£16.21	£6.71
2024/25	£31.34	£13.84	£4.15	-£4.75	£33.75	£11.71

We are forecasting an income of £1m for 2025/26 and this will be achieved by diverting more recyclable material to the right stream.

#### 6.0 Contract Performance and Monitoring

- 6.1 The contract management hub within Public Realm department oversees and manages day-to-day performance management of the Integrated cleansing waste and recycling contract. This is to ensure better consistency of approach, better integration and regular reviews of contract key performance indicators. There are performance reports and dashboards to monitor material performance of loads going to the processor, N+P. This in turn drives the conversation with both Veolia and N+P through a series of reoccurring meetings.
- 6.2 Greater emphasis has been put on Veolia to monitor the quality of recyclable material they collect and to highlight areas of high contamination. This in turn helps us to target these locations with intervention through education resulting in better quality materials reaching our recyclate processor, N+P, which is demonstrated in the tables above.
- 6.3 The waste and recycling performance data is now available on Open Data platform for public to see. Data is updated on a quarterly basis.

#### 7.0 Partnership Working

- 7.1 Driving up recycling rates and reducing contamination relies on effective stakeholder engagement and management. We work with many key stakeholders, including Veolia, recycling processor, N+P, West London Waste Authority and internal council teams such as Communication, Neighborhood Management, Housing, Enforcement, Schools and most importantly, Brent residents.
- 7.2 Tackling contamination takes a multi angle approach with the most successful albeit resource heavy, being our point-of-sale evidence-led approach, targeting households who repeatedly contaminate their recycling bins. The waste and Recycling team work with Veolia on this, monitoring crew performance, highlighting any room for improvements throughout, the process consists of:
  - Collection crews tag recycling bins found contaminated both with a physical tag and on their system, does not empty the bin.
  - Visits are made by Brent waste and recycling officers to those addresses who
    reach third contamination. During visit bins are stickered, door knocking to speak
    with resident, letter including pictorial information on correct recycling. Upon visit a
    bin and capacity audit is also undertaken.
  - For persistent contamination issues at the same address, where managing agents are involved, they are contacted to remind them of their responsibility to manage waste and recycling at the managed address.
  - Further work is carried out with housing colleagues, signposting any license issues found, joint visits take place where necessary and appropriate.
  - Communal recycling contamination- in addition to literature to residents, working
    with managing agent/caretaker, highlighting contractual agreements whilst
    ensuring facilities are at a standard expected. Bin and infrastructure improvements
    are made and recommended where possible.
  - Veolia management spot check addresses and rounds, highlight repeat offenders
    and monitoring crews where necessary. Veolia are monitoring and reporting on
    hidden contamination in bins providing this information to Brent recycling team to
    lead to targeted action on a round/area level.

- 7.3 One of the highest contaminants in our recycling bin stream is nappies. Our recycling team has partnered with Real Nappies for London who is giving Brent families a £50 voucher towards reusable nappies. Throughout the month of April and May 2025, officers visited all 6 libraries, and a pop-up information event was held during rhyme time sessions. So far 24 vouchers have been issued to parents in Brent. The scheme has been launched in tandem to inform parents on the correct disposal of single use nappies, utilising the nappy monster asset, to keep them out of the recycling stream and put correctly in the general waste bin whilst encouraging parents to make a more environmentally friendly choice with reusable nappies, which saves money too. Visit: <a href="https://www.realnappiesforlondon.org.uk/brent">https://www.realnappiesforlondon.org.uk/brent</a> for more information.
- 7.4 Waste and Recycling officers work closely with the Council's Climate team on initiatives like repair café and schools Climate Action plan.
- 7.5 We are currently exploring a new partnership with an app called Litter Lotto. Litter lotto incentivises correct recycling at home as well as correct litter and recycling disposal out of the home, in parks and on the street in the borough. The at home function will incentivise residents to receive rewards for recycling or disposing of waste correctly by providing rewards which enter them into regular cash prize draws.

#### 8.0 Recycling Communication and Engagement

8.1 Waste and recycling officers recently carried out an evaluation exercise to measure how successful the current process and assets, including stickers and letters, are at reducing contamination. They completed the intervention using two collection rounds with addresses found with contaminated recycling bins. One round with a high number of Houses with Multiple Occupancy (HMO's) was chosen to see the variance in performance. When officers revisited the addresses after 3 weeks to check the result of their intervention, they saw a success rate of 70% on a normal round and 58% on the rounds with high number of HMOs. The below table provides further data.

Recycling Round	Round 1	Round 2 (HMOs)
J variation		
Total number of addresses	1216	520
Number of addresses		
found contaminated	129	85
% contamination	11%	16%
No. households revisit 3 weeks later	129	85
No. households contamination still present	39	38
% addresses remained contaminated	30%	42%
% with no contamination present	70%	58%

8.2 We rely on Veolia crew performance correctly tagging and not emptying contaminated bins. With a high number of bins to empty on each round, there is room for human

error. To manage this, we monitor reports on number of bins tagged on a monthly basis by Veolia crews. Any crew with a large difference month on month are flagged to Veolia management with Veolia then monitoring targeted crews. Brent waste and recycling officers ride along with Veolia crew on a regular basis to monitor both resident and crew recycling performance. In the process they speak to residents, provide education and make improvements where appropriate and necessary.

- 8.3 In July 2024, we launched our new contamination campaign, depicting 'monsters' for key contaminants we find in the household recycling bins from data provided by our recycling processor. There are 6 monsters: food waste monster, clothing and textiles monster, black sack monster, nappies monster, electrical items monster and garden waste monster. Media coverage on these have consisted of JCD boards, organic social, paid ads, Brent magazine features, school workshop and school video. All content links to webpage to find out more, including a helpful tutorial video on our main webpage of what can go into each bin, explaining contamination, how to tackle it and the effect of it. More detail can be found in the link below: https://www.brent.gov.uk/bins-rubbish-and-recycling/bin-monsters
- 8.4 After the launch of all monsters, a targeted approach was taken to highlight one monster at a time with a clear message and call to action. For example, with food waste high at Christmas and excess waste also seen, the food waste monster was targeted across JCD and social during the festive period.
- 8.5 Garden waste monster was targeted during the seasonal months when residents are signing up to garden waste service, promoting the service as well as highlighting the issues of garden waste going into the recycling bin incorrectly. Garden waste monster gif in March 25 received 20,000 views: https://www.facebook.com/BrentCouncil/videos/500545649771045/
- 8.6 Textiles monster saw coverage in between season changes when we expect to see people throw away textiles. Textile monster gif received 33,000 views: https://www.facebook.com/BrentCouncil/videos/508736781953981
- 8.7 Targeted messaging per contamination monster includes:
  - Food waste should always go in your food waste caddy, which are free and collected weekly, freeing up space in general waste bin
  - Textiles use our free small items collection, local charity shops, or TRAIDs pick-up option to give your clothes to someone who needs them
  - Nappies cannot be recycled- must always go into the general waste bin, why not try reusable nappies and claim your free £50 voucher towards them
  - Black sacks- must only be used in your general waste bin, cannot be recycled and can result in good recycling being wasted
  - Garden waste Use our garden waste service to recycle your garden waste correctly sign-up online for your yearly subscription
  - Small electricals/batteries Use our free small items collections service, or battery bins found in shops and local libraries.

#### 9.0 Areas of Improvement, upcoming projects and learning from recent initiatives

- 9.1 The introduction of twin stream recycling, which involved separate collection of paper and card, has not only made us compliant with the Simpler Recycling legislation, we have also seen improvement in the quality of paper and card collected. The introduction of blue bags for paper and card has helped to reduce contamination and improve income from fibre collected. The contamination rate for paper and card is less than 0.2 percent. Although our participation rate for blue bags is 80 percent, we would like to further improve it to 85 percent or more.
- 9.2 Initial challenges were faced at the start of roll out of blue sacks due to poor quality of sacks received from the manufacturer. The blue bag sample shown to officers was not what the council received. Due to longer delivery period, full order was placed, and the council had no choice but to receive delivery and roll it out across the council. This was challenged and disputed with the supplier and officers managed to get 50% of the amount back. This was then used towards ordering a better-quality blue sack with a different supplier. The new bags are now in circulation, and we have not received any quality complaints. In turn, we have seen number of orders of the new sacks grow alongside positive feedback.
- 9.3 We are in the process of improving our communal recycling. Communal recycling was separated from kerbside recycling in October 2023, to reduce overall contamination seen at the recycling processor, N+P. This in turn has been successful in cleaning up our kerbside recycling and led to more accurate monitoring and targeted intervention on the kerbside recycling stream. Contamination found in communal recycling remains too high to make it financially viable to process all recycling collected from communal bins. To tackle this, a targeted approach is being taken, monitoring each communal round and load with video and photo footage to inform which rounds can move as recycling and which need further work to drive down contamination. Improved infrastructure is being applied per round to communal sites, with auto locking and reverse hinged recycling bins which prevents large sacks of rubbish being placed in them. Work is currently underway to upgrade bins, after which we will monitor the impact of the changes made.
- 9.4 Indoor kitchen caddies and liners have been introduced to 25% of all properties in blocks of flats, with roll out to 100% to be complete by March 26. All residents will receive a 5litre indoor kitchen caddy, a roll of caddy liners and a flyer about how and why to recycle food waste. Average monthly food waste tonnage has increased by 50% since the roll out to communal rounds. 140 new communal food waste housing units are in process of being delivered to all BHM sites over the coming months. Privately managed estates will also receive upgraded communal food waste bins for those that do not yet have sufficient provisions. On kerbside food waste recycling, a project plan is in progress to increase participation and in turn food waste tonnage. Evidence led approach is to be taken targeting rounds/ areas with the lowest reported collected food waste tonnages, with a trial to measure intervention success prior to further roll out.
- 9.5 Since the monsters contamination campaign and intervention launched in July 2024, we have seen a considerable drop in the number of rejected loads at N+P. An average of 33% of loads were rejected in 23/24 compared to an average of 18% of loads rejected in 24/25, which is a difference of -15%. The less rejected loads increase the overall tonnage of recycling processed, increasing rebate whilst reducing costs on rejected recycling which moves as general waste when rejected. So far in 25/26 we have seen 1 rejected load in April and 0 rejected loads in May which is a successful start to the year.

- 9.6 When measuring contamination, we look at both number of rejected loads due to contamination being viewed at 20% or more done by visible checks at N+P, our recycling processor contractor, as well as sampling carried out on the accepted loads of recycling. This gives us clear data on what the key contaminants are when it gets to the plant, some of which are not visible to crew or officers at checks due to being hidden at the bottom of recycling bins. The top 6 contaminants found in our recycling, from data from N+P are: food waste, textiles, black sacks, nappies, garden waste and electrical items. Food waste and textiles remain the highest each month, particularly due to weight whereas black sacks which are more prevalent visibly, are lighter in weight. The contamination rate from the sampling of the accepted tonnage, we have seen it remain relatively the same each year at 19.1% in 23/24 and 19.7% in 24/25. Therefore, we have further work to do on reducing the contamination rate from the sampling of our accepted loads.
- 9.7 HMOs and places of residence with shared bins remain a difficult property type when it comes to issues with waste management, including contamination, excess waste and incorrect usage of bins/containers. Lack of responsibility and ownership makes it difficult to change behaviours as well as transient nature of residents residing at these addresses. Other issues include overcrowding and unlicensed properties with landlords and managing agents difficult to reach. We are working collaboratively with private housing colleagues to work towards tackling these issues, however, with recycling alone not enforceable in legislation, this becomes a barrier for change.

#### 10.0 Simpler Recycling and upcoming legislations update

- 10.1 **'Simpler Recycling'** will enable consistent, more streamlined collections from all households, businesses and relevant non-domestic premises (such as schools and hospitals). The new default requirement for most households and workplaces will be 4 containers for:
  - residual (non-recyclable) waste
  - food waste (mixed with garden waste if appropriate)
  - paper and card
  - all other dry recyclable materials (plastic, metal and glass)

This is the government's maximum default requirement and is not expected to increase in the future. However, councils and other waste collectors will still have the flexibility to make the best choices to suit local needs. These reforms will reduce confusion, ending the 'postcode lottery' of bin collections, which will help ensure the correct materials are captured for recycling.

Local authorities will be required to collect the core recyclable waste streams from all households in England by March 2026. This includes introducing weekly food waste collections for most homes.

Kerbside plastic film collections from businesses and relevant non-domestic premises, and households will need to be introduced by 31 March 2027.

Brent is already mainly compliant, though arrangements will need to be made for plastic film collections from 2027.

- 10.2 **Extended Producer Responsibility** From 2025, some organisations and businesses will have to pay a fee for the packaging they supply to or import into the UK market. This is called extended producer responsibility (EPR) for packaging. The money will go to local authorities, as:
  - waste disposal, waste collection (such as Brent) or unitary authorities.
  - statutory waste disposal authorities (such as WLWA)

It will cover net costs of collecting, managing, recycling and disposing of household packaging waste. In the future, Local authorities will need to sign up to the new local authority payments (LAPs) function of the EPR digital service to receive payments. In the first year (April 2025 to March 2026) LAs will receive a basic payment based on, publicly available and existing data, including Waste Dataflow information and Office of National Statistics (ONS) data. Data about tonnages, operations and unit costs gathered from a representative sample of LAs across the UK. From the second year (April 2026 to March 2027) the basic payment and any adjustments will be based on data LAs submit to the Scheme Administrator.

Brent's estimate for the basic payment for first year of scheme is estimated at £3.6m. The first payment will be made between October and December 2025 and will cover the first 2 quarters of the financial year. The second and third payments will be made between January and March 2026 and will cover the third and fourth quarter of the financial year. Further details on final amount and payment dates will be received in due course.

10.3 Emissions Trading Scheme scope extension to waste from 2028 - The ETS is a cap-and-trade system that applies an additional cost to fossil-based emissions released by the incineration process. The expansion of ETS to waste will bring additional costs as it seeks to influence a reduction in emissions from incineration and energy from waste. ETS is a market-led scheme meaning the costs are volatile, moving around with the market due to factors often outside of the waste systems control.

Local authorities are legally obligated to collect household waste including materials that are difficult and expensive to process and provide a universal service that includes those that do not participate in recycling schemes.

Based on available data, the expansion of ETS to local authorities in 2028 could add gross additional costs of between £367 million and £747 million and could rise to £1.1 billion in 2036 with a total cumulative cost over this period that could be as high as £6.5 billion.

Should packaging EPR cover the costs of the fossil-based packaging waste in the residual stream, which is estimated to be around 18 percent, then the costs to local government could still be up to £551 million in 2028 and could rise to £837 million in 2036 and bring about a total cumulative cost of £5.4 billion over this period.

This is an enormous financial pressure that would create real challenges for local government and its statutory requirement to set a balanced budget each year. While the high-cost scenario may not come to pass, councils would need to take action to budget for this scenario given the level of uncertainty due to the price volatility.

Brent's residual waste is currently treated at an energy from waste plant, so these costs will apply.

#### 11.0 Stakeholder and ward member consultation and engagement

11.1 The Lead Member is appraised of waste and recycling performance as part of her fortnightly briefings with officers. An end of year (2024-25) performance review meeting took place with the lead member in June 2025, highlighting areas of improvement and challenges faced in waste and recycling service. In addition, representatives from the Veolia contract also provides a monthly performance report directly to the Lead Member.

#### 12.0 Financial Considerations

12.1 There are no financial considerations that arise directly from this report. But a detailed financial summary highlighting the recycling processing costs and income generated is provided in section 5 of the report.

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#### 13.0 Legal Considerations

13.1 There are no legal implications arising from this report.

#### 14.0 Equity, Diversity & Inclusion (EDI) Considerations

14.1 There are no EDI considerations relating to this report.

#### 15.0 Climate Change and Environmental Considerations

15.1 The Integrated Street cleansing, waste collection and recycling service contract supports the borough plan priorities for; A cleaner Greener Future and Healthier Brent, along with various key strategies including the Brent Climate & Ecological Emergency Strategy 2021-2030.

#### 16.0 Human Resources/Property Considerations (if appropriate)

16.1 There are no HR or property related implications arising from this report.

#### 17.0 Communication Considerations

17.1 There is an ongoing engagement and communication plan in place to address recycling behaviour change as highlighted in section 8 of this report.

#### Report sign off:

#### Alice Lester

Corporate Director, Neighbourhoods and Regeneration