



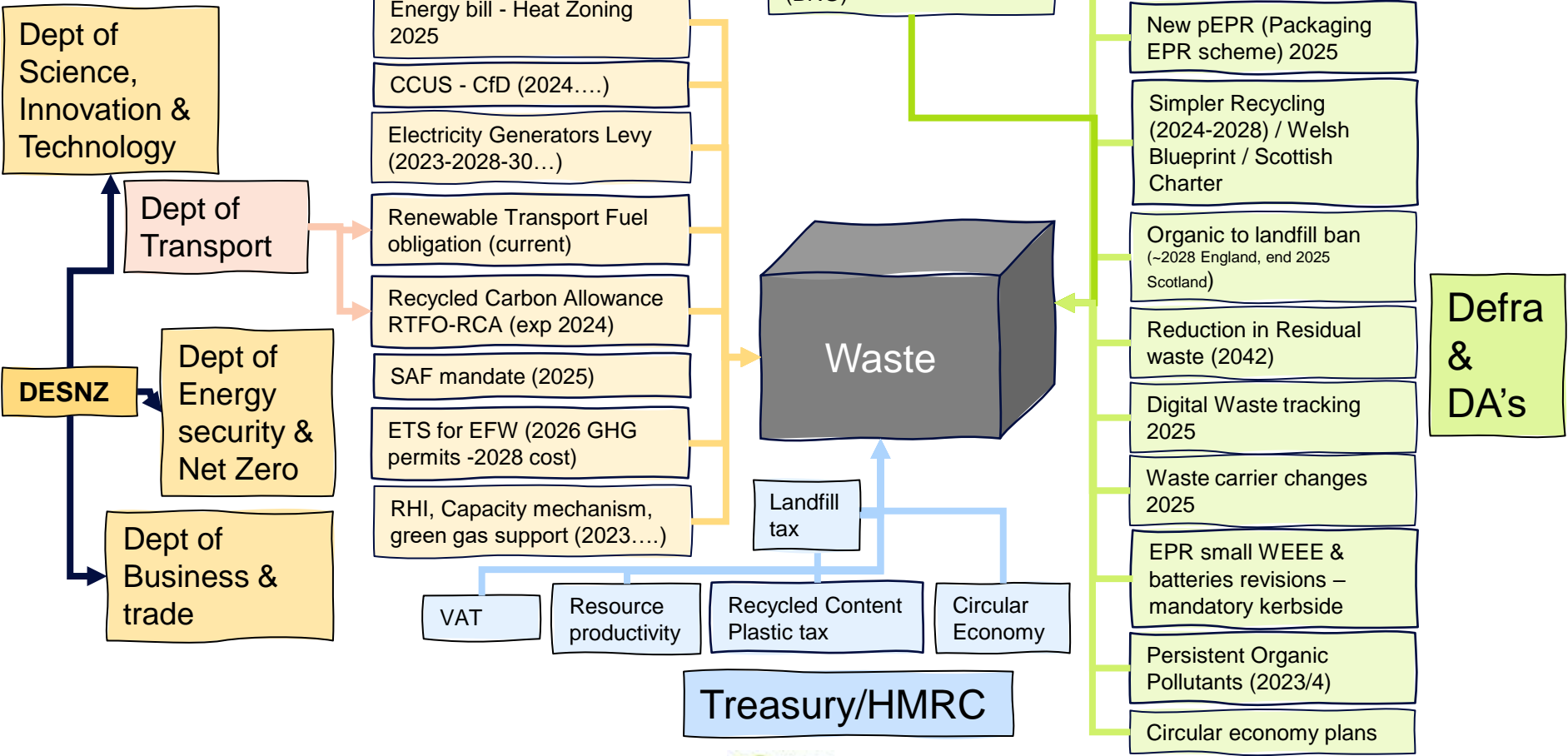
# **SUEZ UK**

**Policy Transition  
a practical route map for change  
NERF**

**Stuart Hayward-Higham**

20/11/2024





# Resources and Waste Reforms Roadmap 2025+

Nov 2024 – Dates shown are subject to change

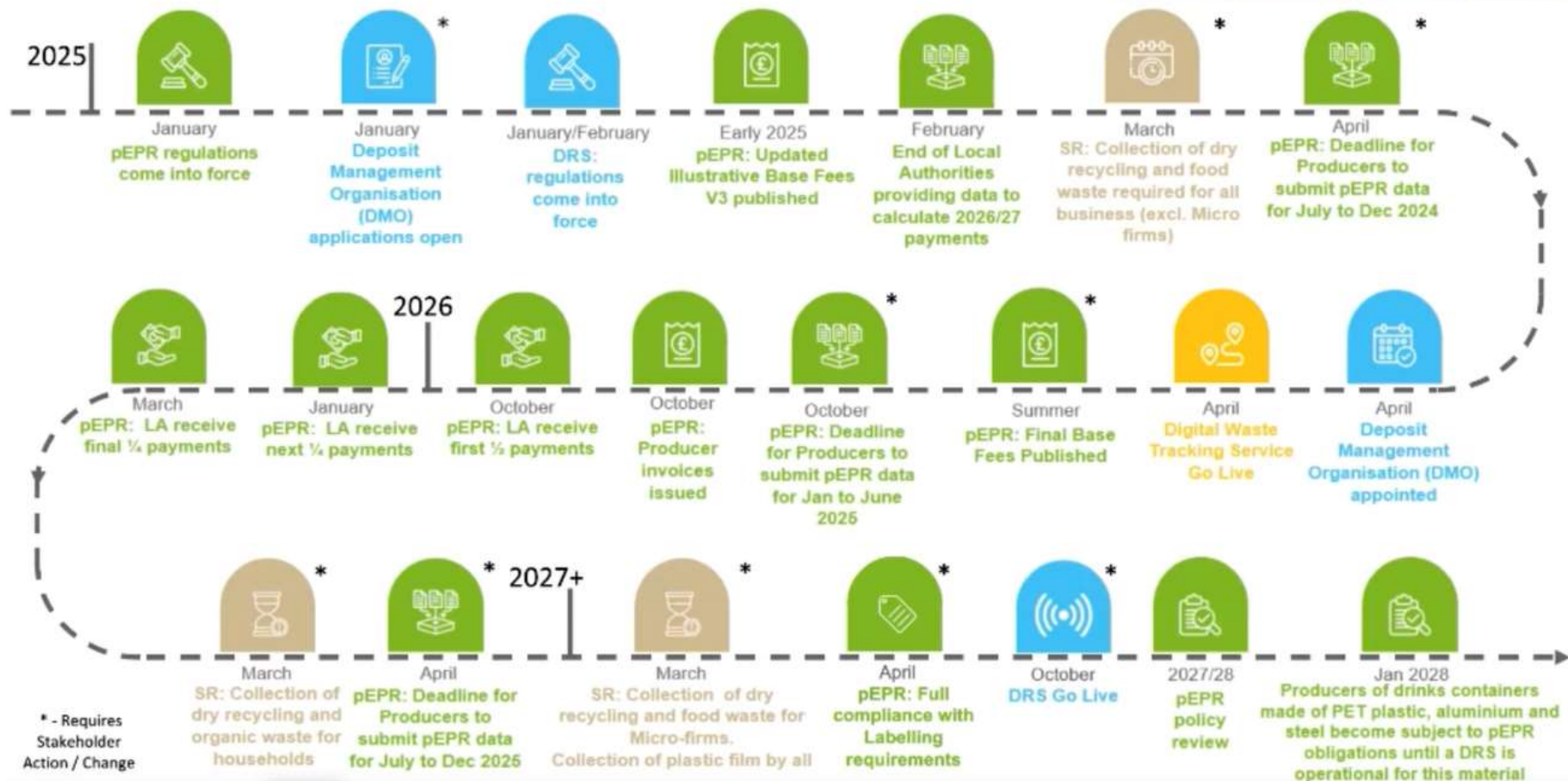
Key:

pEPR

DRS

SR

DWT



# 'Simpler Recycling' guide for England

## Who, what & when

### Local Authorities (LA's)

Residual waste frequency no less than fortnightly from March 2026  
All dry recycling (exc Plastic films) from March 2026. Films from March 2027.

Separate food waste from March 2026 unless transitional arrangements apply.

Garden waste collections from March 2026

### Businesses (excl. micro firms)

All dry recycling by March 2025 excl. plastic films. Plastic films from March 2027.

Separate food waste collections from March 2025 (no minimum frequency)

### Micro-firms (less than 10 FTE per enterprise not location)

Dry recycling by March 2027 incl. plastic films which are also required from March 2027

Separate food waste from March 2027 (no Minimum frequency)



## Materials required to be collected

- Glass, including bottles and jars
- Metal – steel and Al cans, aerosols, Al foil & food trays, jars, bottle lids & tubes
- Plastic – PET, PP & HDPE bottles, PET, PP (inc expanded PP) and PE Pots tubs and trays, PE & PP tubes larger than 50mmx50mm, Cartons for food, drink & other liquids, Plastic films & bags (from March 2027) Mono PE, PP & mixed PE & PP including metallised through vacuum or vapour deposition.
- ALL paper & card, except that which contains glitter or foil, is laminated, is sticky backed, padded lined envelopes, paper & hard back books and wallpaper.
- Food waste separately collected from March 2026



**Targets (England)**  
55% reuse/recycling by 2025  
60% reuse/recycling by 2030  
65% reuse/recycling by 2035  
Municipal waste landfilled less than 10% by weight  
50% reduction in residual waste by 2042 (72%-75% recycling rate)



New burdens funding (reasonable costs) for LA's  
pEPR for Packaging for LA's  
Charging for green waste  
Commodity values & PRN/PERN values for all  
Council Tax / Service fees / gate fees



## How

- No requirement to separate flows, exemption expected for current legal requirement to collect separately metals, plastics, fibre & glass, with an exemption no written justification is required.
- Free Source Segregated food waste collection. Co-mingling with Green waste allowed till March 2026, and beyond for those LA's with exemption (proposed) and written justification. Green waste can be charged for, Food waste no charges.
- Plastic films and bags to be collected by all by March 2027.
- Near elimination of bio-waste to landfill in 2028
- ETS by 2028 for EFW
- Recycled content plastic packaging tax

## DRS

PET (up to 3 litre), steel and aluminium beverage containers from Oct 2025

## Targets

- 70% year 1
- 80% year 2
- 90% year 3 onwards



DRS – Deposit return scheme  
pEPR – Packaging Extended producer Responsibility  
ETS – Emission trading scheme

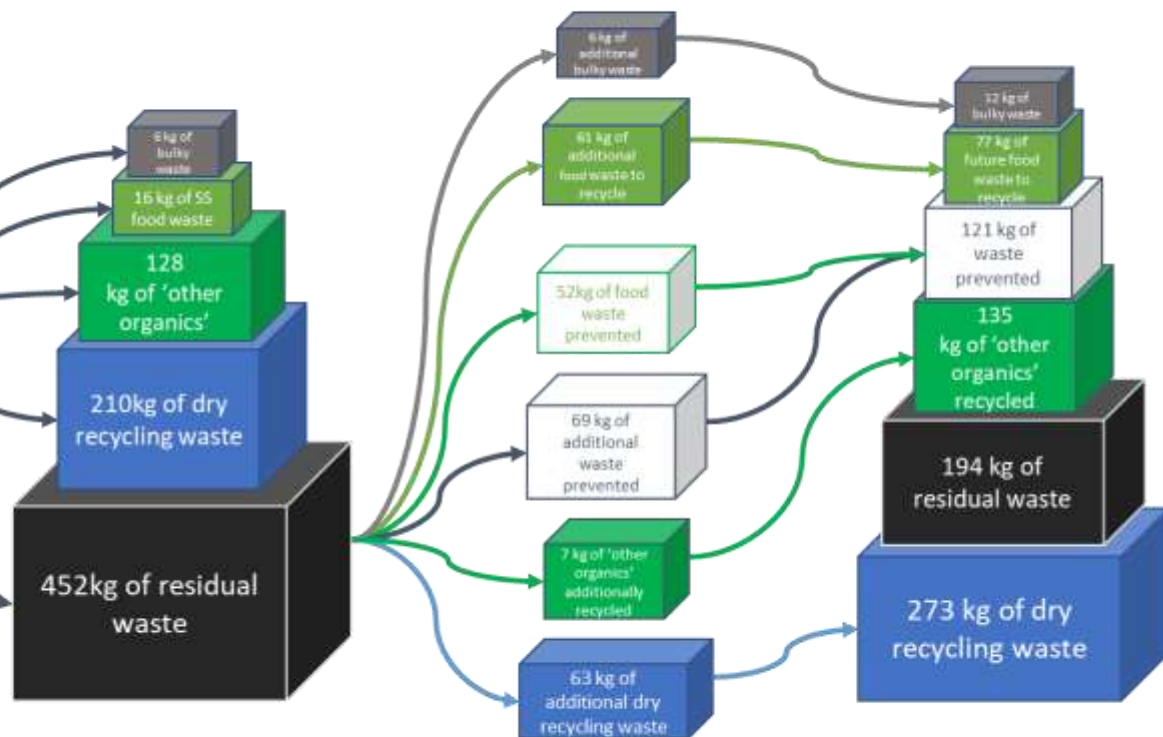
But some things are still changing, Exemptions are yet to be confirmed, the RAM guidance is still being developed

Current  
44% recycling

2042 future  
(72% recycling)

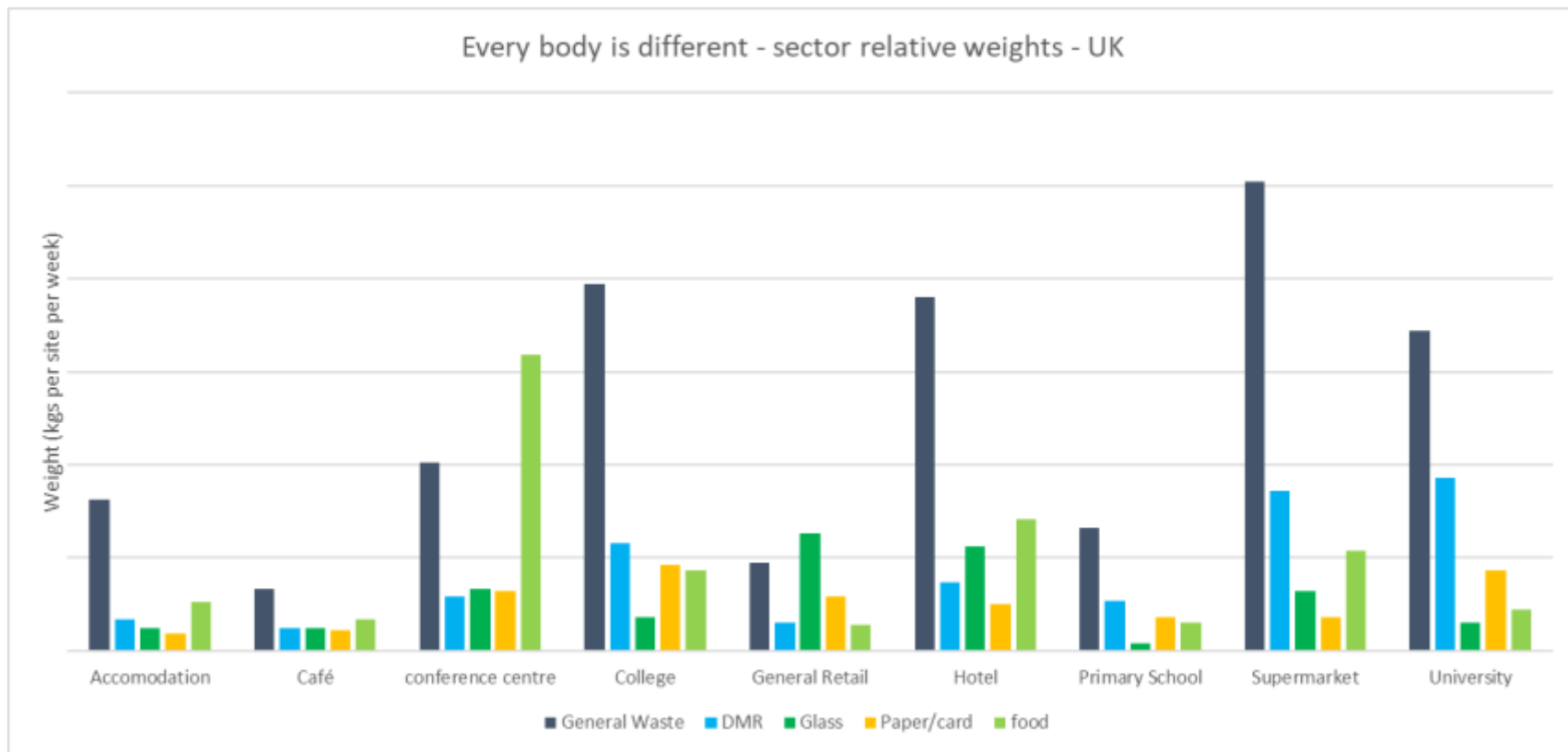


Consistency of collection
DRS for beverage container waste
EPR for packaging waste
ETS for residual waste or all waste
Waste Prevention Plan
Waste targets, WEEE, batteries, HWRC's

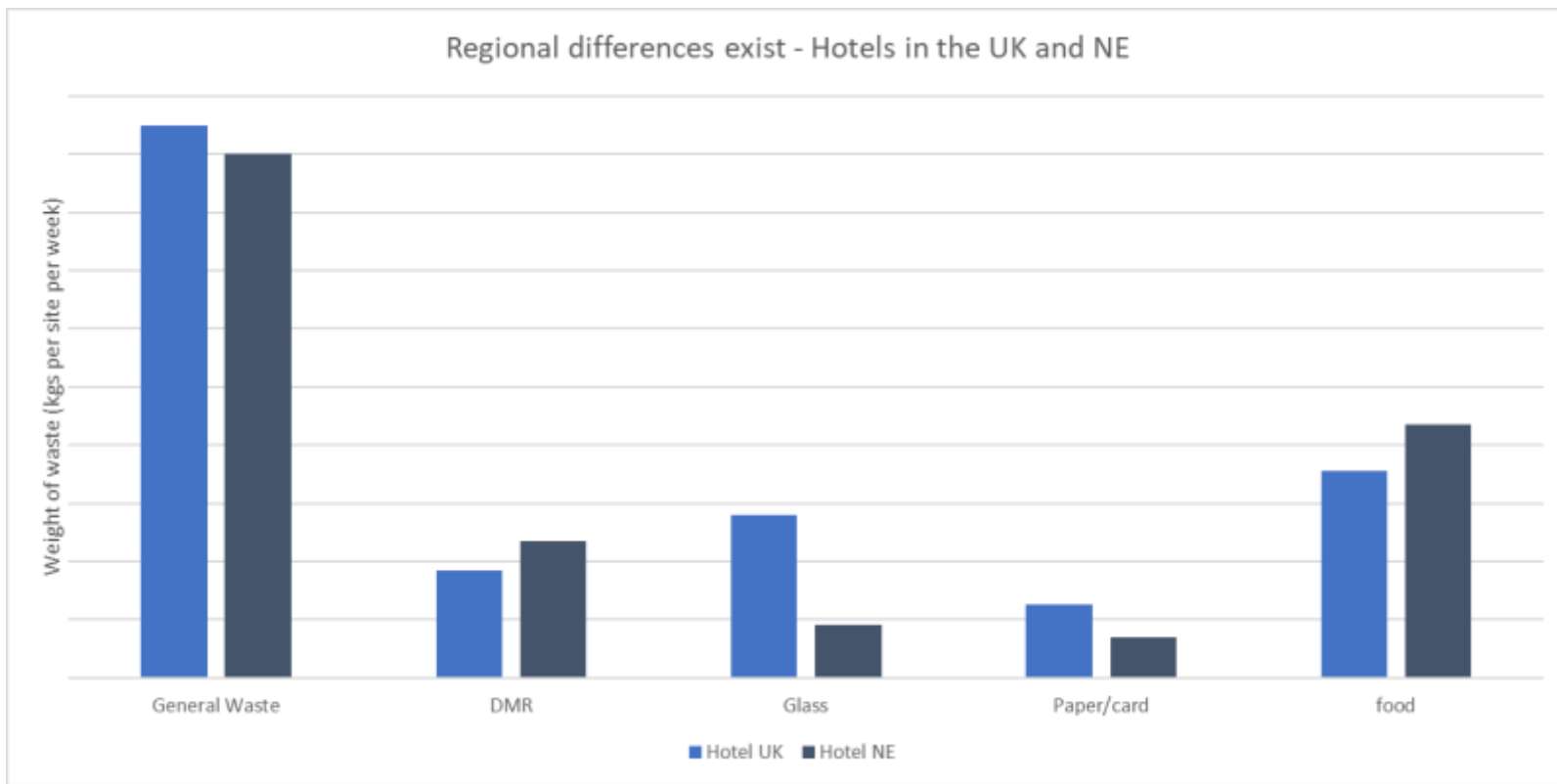


2042 waste reduction target – Component construct by waste stream or activity

# No customer is the same



## And customers are different in different regions



# Timetable (simplified)

Q3 2024

- MF sampling and compositional testing requirements (except Scotland)

Q2 2025

- Simpler recycling larger businesses (commercial & trade waste)
- Digital Waste Tracking (all) – *possibly delayed but officially April 2025.*
- MF sampling and compositional testing requirements (Scotland)
- pEPR starts

Q3 2025

- pEPR LA payments

Q1 2026

- ETS GHG permits applied for all EFW's and possibly Haz and Clinical incinerator facilities

Q2 2026

- Simpler Recycling LA's, except those that have requested and received an exemption for SS food waste. Pots tubs and trays, cartons and food added to collections. Exemptions yet to be completed legally.

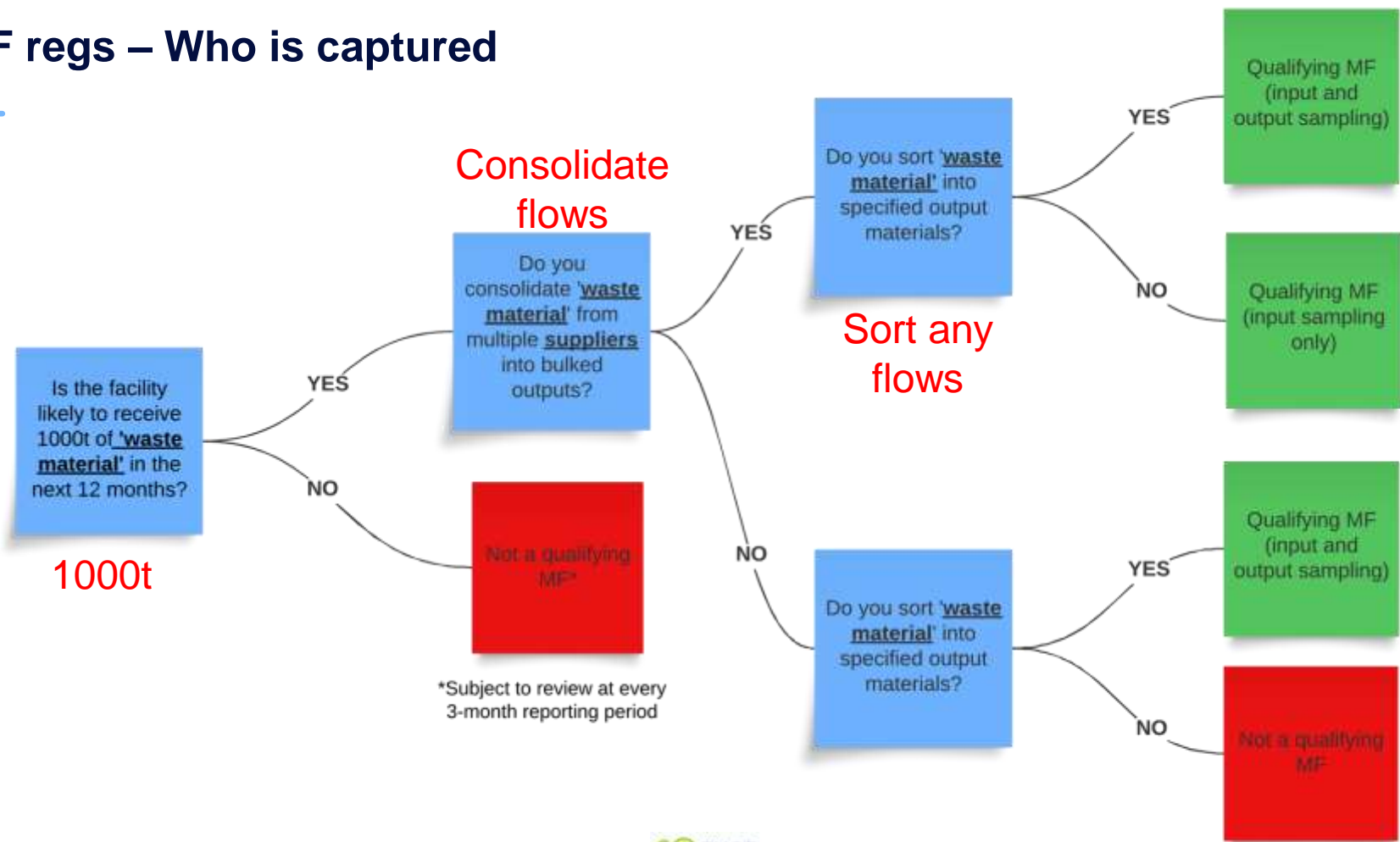
Q2 2027

- Simpler recycling - smaller businesses (subject to exemptions being legally completed)
- All LA's and businesses must be collecting plastic films and flexibles
- DRS starts (*except Wales which this week delayed its devolved process*)

Q2 2028

- English near elimination of bio – landfill ban
- ETS costs applied to all EFW's, and potentially most clinical and haz waste incinerators

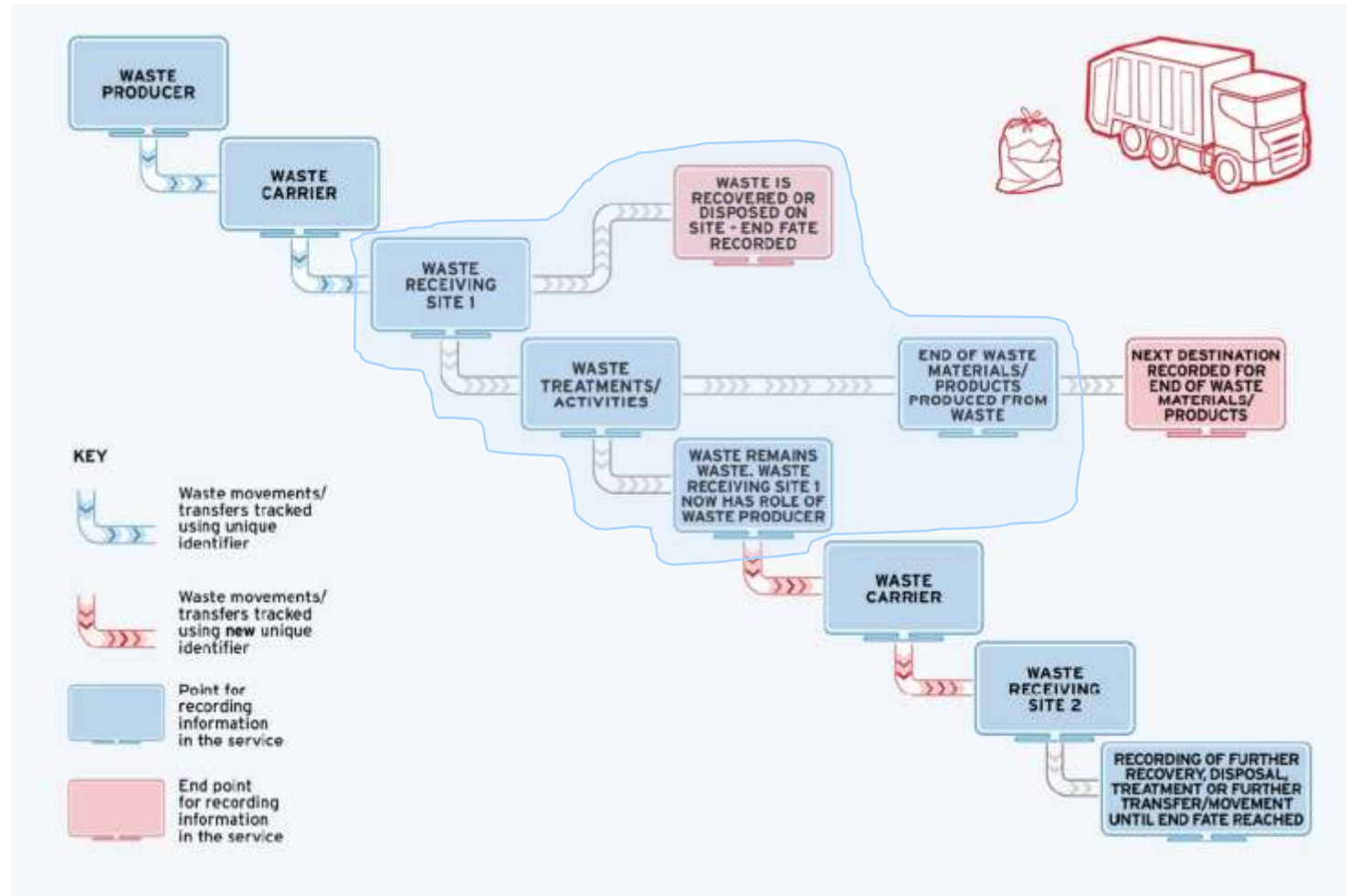
# MF regs – Who is captured

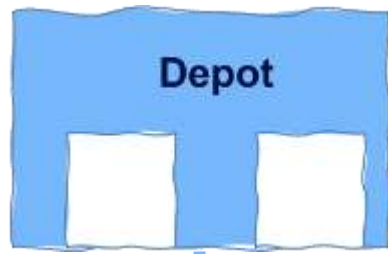


# DWT - sites

Duty of Care  
but near real  
time reporting  
and everything  
is reported.

Don't forget the  
new waste  
carrier  
regulations





Depot

Regulator / Regulatory system



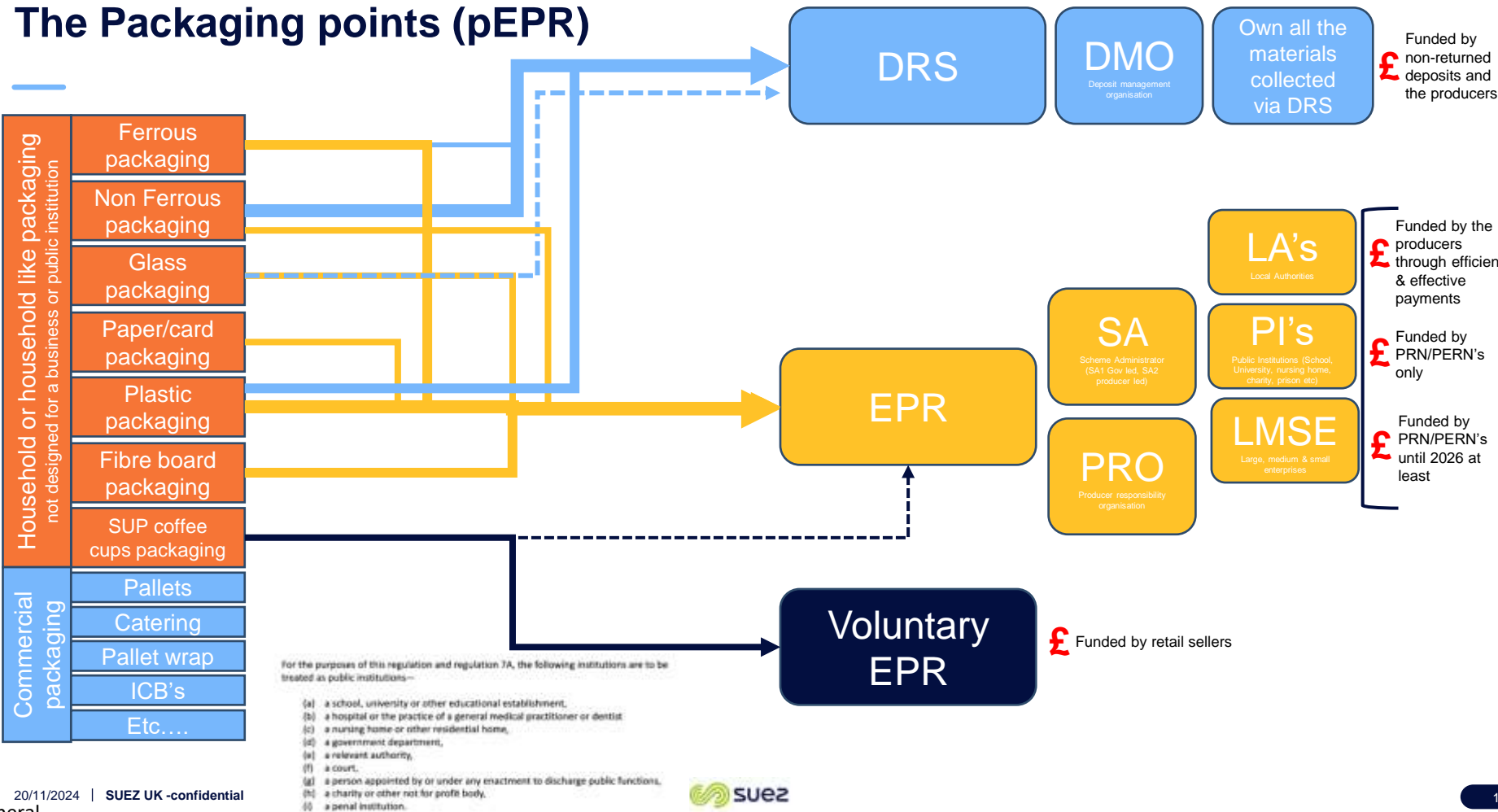
1<sup>st</sup> Point of Consolidation

Notify round and collection points and proposed 1st point of Consolidation

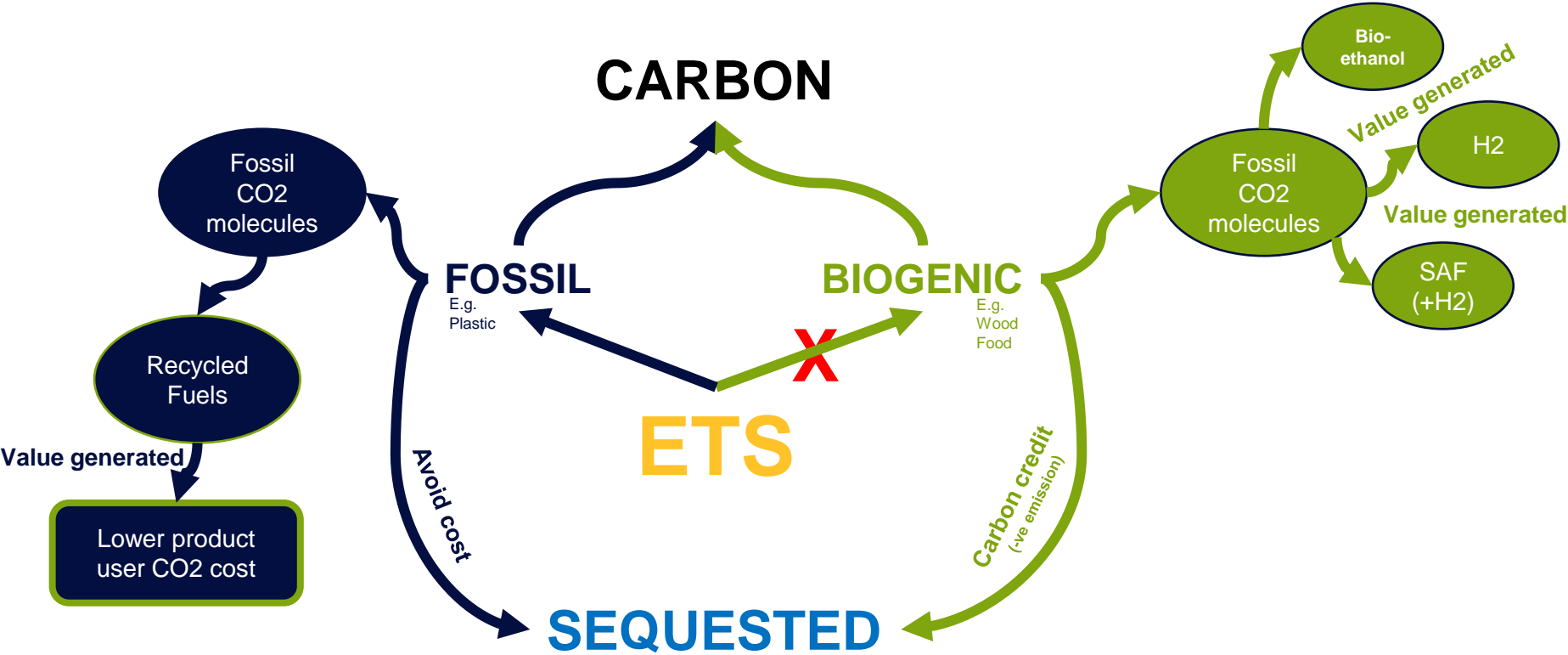


Notify Round & completed collections & attempted not collected and missed collections at FPOC

# The Packaging points (pEPR)



# Carbon and ETS



# Understanding weight to emission - ETS

## UK emissions trading scheme and energy-from-waste

UPSTREAM		
	Collection obligation	Subject to EPR
 Waste electrical and electronic equipment (WEEE)	Moving towards a kerbside collection obligation	Yes

**32.5% fossil by weight to 49% by measured stack emission**

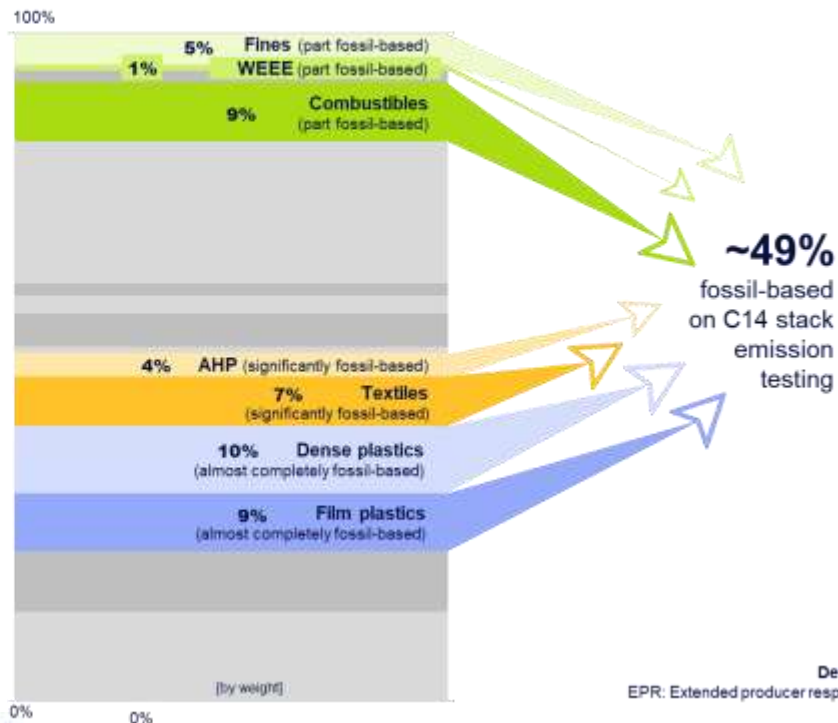
 Absorbent healthcare products / Textiles	No universal recycling collection obligation	Not yet
 Dense plastics	Packaging elements collected already or targeted for recycling collection by 2026 (England)	Most items
 Film plastics	Targeted for recycling collection by 2027 (England)	Substantially

### Volume

Quantum in residual waste set by Placed on Market from producers, consumption and disposal habits by consumers and collection / handling recycling efficiencies by local authorities, waste management companies and waste management systems.

UK emissions trading scheme energy-from-waste financial burden basics  
– tonnes by fossil content by carbon price

## EXAMPLE RESIDUAL WASTE COMPOSITION



### Definitions

EPR: Extended producer responsibility

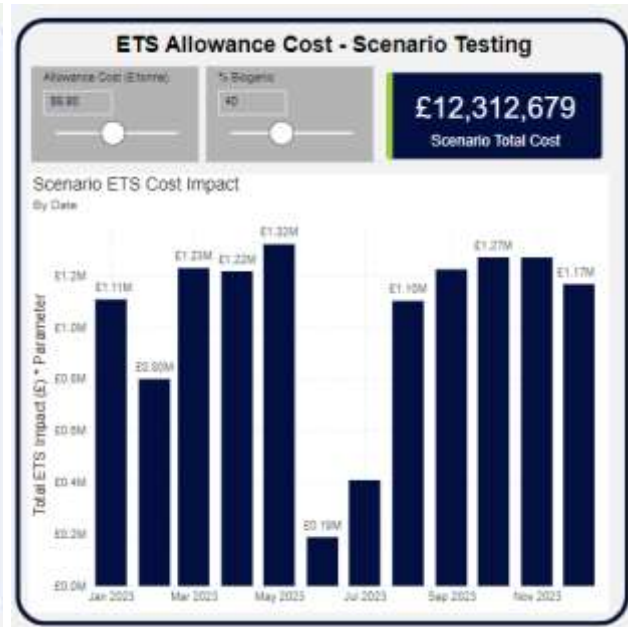
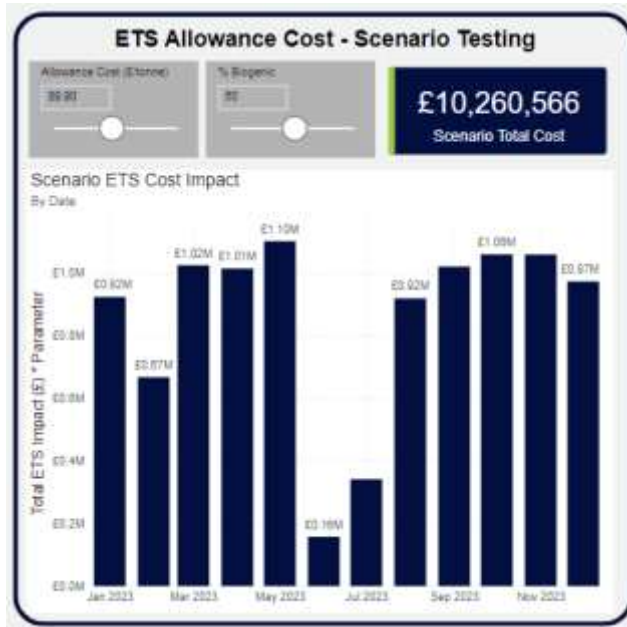
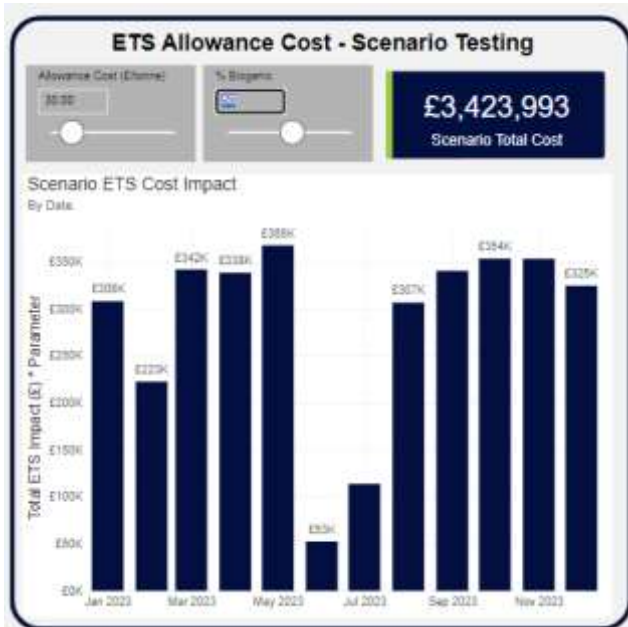
# Example EFW costs for ETS – 250ktpa facility – monthly variations

Variation shows variation by month by tonnes, availability, price and composition

**£30/t CO2e – 50% Biogenic**

**£90/t CO2e – 50% Biogenic**

**£90/t CO2e – 40% Biogenic**

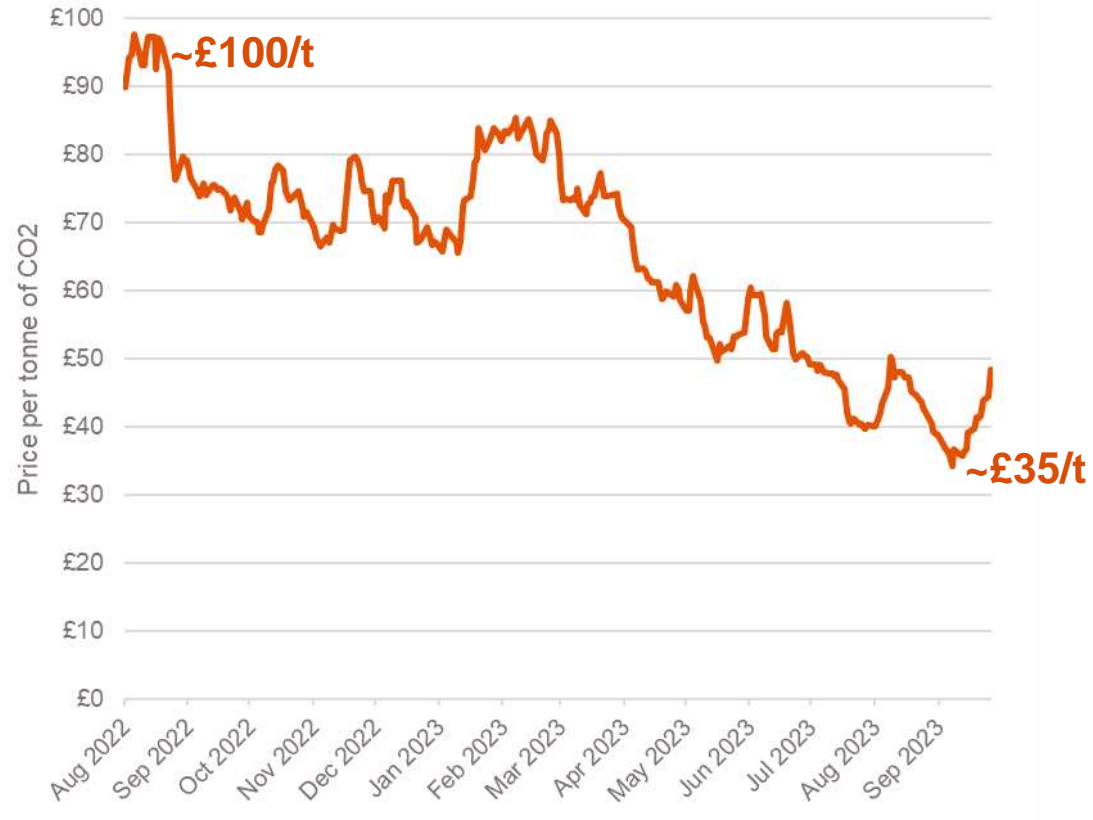


# The UK ETS price is volatile

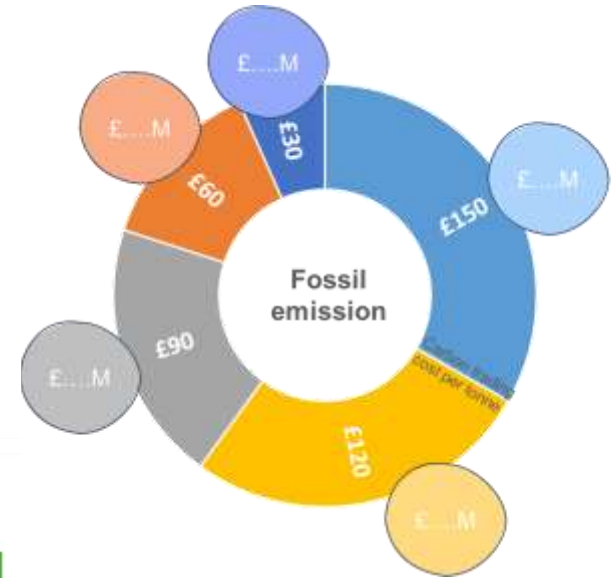
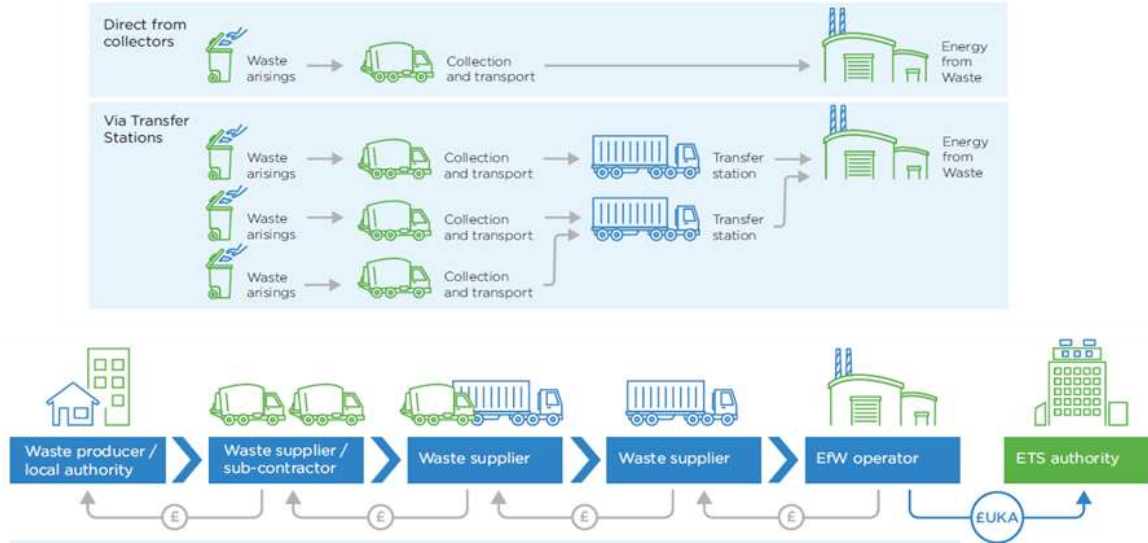
The Price drop has been partially driven by the UK Government releasing allowances to mitigate the power price rise due to the war in Ukraine,

Target prices for UK ETS are ~£150/t by 2035 and they are not proposing to bring us in with our full sector allowance (Not 10Mt, possibly 7Mt, CCC recommendation 0Mt).

Constraint on allowances increases demand and price



# ETS cost pass through is complex



**Stack measured and customer individual calculation**

**Individual LA emission factor based on Welsh Model of individual LA factor**

**Individual emission factor based on collection method – ESA method**

# Summary

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- Easier to find things that are not changing
- But in many ways, its an evolution of current practice
- Don't wait for the 'big' bang, prepare, measure and rehearse
- Engage and collaborate
- The next 5 years will see dramatic changes in our sector and the value chains we service.

**END**

20/11/2024

