

**Mr D Ashford MBE MHK**  
**House of Keys**  
**Legislative Buildings**  
**Douglas**  
**IM1 5PW**

28<sup>th</sup> November 2022

Dear David

Thank you for your letter, received Friday 25<sup>th</sup> November 2022, and for taking the time to write to me directly with your concerns. I have responded to each of the main points below and would be very happy to meet you to discuss these matters further.

Firstly, I am sorry that you feel the Council is taking a dogmatic approach. The whole purpose of the change in service is to encourage residents to recycle more. As you will know from your time here, the Council agreed to continue the Isle of Man Government's kerbside recycling initiative in 2008 and, since that time, has applied various methods to encourage residents to recycle. Some of these initiatives have been very time intensive, with little success. For years, our recycling rate has remained fairly static at around 5-6% and compositional analysis of household bins showed there was still recyclate to be captured in household residual bins.

In an attempt to bolster the recycling rate, the Council introduced cardboard collections at the kerbside to save many householders a trip to the amenity site. Despite all these efforts, however, the overriding issue was that it was too convenient to *not* recycle and so the Council set about researching how this position could be changed.

The most successful means of encouraging recycling is to reduce residual capacity. This is either done through less frequent collections or smaller bins and the Council chose the former as its new waste service. At this juncture, I must point out this is not a reduction in service. We are still collecting the same amount of weight we have always collected and have not asked householders to refrain from setting out a material that we once collected and no longer do.

We are merely asking residents to set out their waste differently so we can deal with it in a more environmentally responsible way and one that meets the Government's current Waste Strategy. Indeed, we have enhanced the offering by providing a green garden waste collection service which will, from next year, run until the end of November following residents' feedback.

We believe our approach aligns with our commitments as a biosphere partner and the Government's pledge under the Climate Change Agenda.

You state the policy is not working and I would challenge this assertion. We spend a disproportionate amount of time dealing with those residents who are opposed to the change in service on philosophical grounds, rather than genuine concerns brought about by an inability to manage their waste – we are and will continue to assist the latter residents. However, we really should be celebrating the many residents who have adapted to the new service and for whom it is very much working. By and large, these residents are actually put off commenting on the continuous ‘shouting’ of the few unhappy residents on Facebook, as they are then abused by those unwilling to change.

Turning to your specific areas of concern:

**Residents requiring additional capacity due to specific medical needs.** Personally, I have had one vulnerable resident’s family contact me with concerns and, in my experience of this, I can assure you assessments are undertaken sympathetically and with grace. In this particular instance the resident was given an assisted collection which was more suited to their circumstances and was very happy with the outcome. On arriving at the home of a householder who has requested an assessment, it is frequently obvious that extra capacity is required, without the need to access the black bin. In addition, it is always almost immediately clear if the household is recycling and recycling every waste stream they are able to at the kerbside; a little education and awareness goes a long way in these scenarios. Our experience is that householders are often quite keen to show us their bins and it hasn’t been necessary for staff to rummage through their rubbish. As I write this letter to you, we have received 119 requests for assessments and have conducted 71, including follow-up visits. In the beginning, we found that 25% of households needed extra capacity and a little education and awareness assisted the remaining 75% in managing their waste. Latterly, we are finding the requests for assessments are coming in from those who genuinely need it and the extra capacity is provided as quickly as possible. We have received thanks and compliments when the assessments are undertaken, the staff are extremely professional and discreet. The approach we have adopted is very similar to when we receive requests for assisted collections and the staff are well versed in handling such scenarios with care. I am sorry to hear that you have residents who have been in tears as this has not been our experience, and I sincerely hope you have signposted them to us to enable us to allay their fears and assist them.

**Neighbour wars.** We have heard of a few isolated cases and will engage with these householders to assist them. If you can please provide their details, we will contact them or ask them to get in touch with us so we can help.

**Side Waste and Fly tipping.** There have been no reported incidents of fly tipping. There are some hot spot areas for side waste that we have been monitoring and providing assistance. We have been working closely with the crews to monitor side waste so that, once again, we can attend and assist struggling householders. All of the incidents of side waste are from households who are not engaging with the Council’s waste service and are not recycling. Incorrect disposal of waste has always been an issue that rears from time to time.

**Use of the CA site.** Since the introduction of the new waste service, we have been closely monitoring material coming into the CA site, both from the point of view of green waste and also residual. We anticipate a drop in the former as householders no longer need to make trips to the site. On the latter, we have not seen a dramatic rise in residual waste but accept the new service is in its infancy so will continue to monitor it over time to see if any trends emerge. Again, if householders choose, for philosophical reasons, to not engage with the Council's new waste service and prefer instead to take material to the CA site, that is their prerogative. However, given the majority of householders in Douglas have adapted well to the new service, the overall numbers are likely to be low, as will the impact on the constituent authorities, especially when any increase in residual waste will likely be offset by a reduction in green waste.

As you will know from your time here, Douglas pays almost 70% for use of the site so any impact on the other constituent authorities will likely be negligible. We have seen reports on Facebook of long queues at the CA site but this has not been backed up by the evidence from the site staff or the vehicle monitoring we undertake. There was one busy Sunday earlier this month and that was due to a variety of factors and cannot be attributed solely to the change in waste service.

**Vermin.** There is no scientific evidence that fortnightly collections lead to an increase in vermin. We have discussed this matter with Environmental Health. Vermin are unlikely to be attracted to waste in plastic bins that are raised off the ground and are unlikely to enter homes if the waste is external to the property. Any incidences of vermin should be reported to Environmental Health as there may be other structural issues at the property causing infestation, unrelated to the change in waste service. Furthermore, there is no need for food waste or other waste items that could attract vermin to be left outside of wheelie bins if the household engages with the new service.

**Bio-aerosols.** We are aware of the current suggestion locally on the health effects of bio-aerosols. Every scientific paper we have read on the subject is considering the health of waste collectors and those who work in waste processing facilities. These papers highlight that waste collection is a dirty, demanding job that carries risk to those who collect. The risk of infection from bio-aerosols is low. We are aware of this and that is why we follow the Waste Industry Health and Safety Forum Guidance for our workers. None of these papers highlight a health issue for households. As to the legality of storing food waste within residual bins for two weeks, several parishes on the Island operate a fortnightly residual collection with no separate food waste collection or indeed a recycling or green waste collection service and there have been no reported issues.

In addition, many other jurisdictions around the world operate a fortnightly collection service and did so for several years before the introduction of a food waste service. The food waste collection service was introduced to meet statutory recycling targets, not because of health issues associated with food waste in the residual bins. There seems to be a focus on food waste but bio-aerosols can also be produced by any form of organic material.

**Flats.** We are working closely with the management companies of flats. We have assessed their residual capacity and need, provided recycling containers, sometimes providing a weekly recycling service, and in some isolated cases made changes to collections to help them accommodate the new waste service where their bin storage provision was not designed for modern living. The main problem we are encountering in flats is poor management of bin stores and a reluctance to engage with the new waste service on philosophical grounds. Again, noting your appendix 1, we recognise some of the photographs as being from flat complexes and, although a picture paints a thousand words, often it only tells half a story!

I attach photos from one apartment block – we have many such photos from other apartment blocks – which clearly shows that one bin store is heavily used but the second bin store and the recycling facilities are underutilised. Often this second bin store is only 10 paces from the first and the management companies need to work with their residents to encourage them to make use of both bin stores and the recycling facilities provided, rather than overloading one bin store. This is about residents taking responsibility for how they dispose of their waste and acting in a mature and reasonable manner because their actions are having a detrimental impact on their neighbours. We do not think this is too big an ask.

**Kerbside service.** The current service was agreed by Council in 2008 and is considered the best and most efficient way of delivering a recycling service at the doorstep of householders. The method we operate is employed by Councils in several countries, the boxes are universally used and for good reason. If householders are finding they have more material than can be accommodated, they can have as many boxes as they need, free of charge. We can also replace them free of charge as the plastic will become brittle over time when exposed to the elements. We are getting a stock of boxes with lids if that is a householder's preference. Stopping boxes from blowing away can be easily mitigated with a small brick and our operatives always endeavour to put them back in a place to prevent this. Where we have come across residents who genuinely have nowhere to store boxes, we have introduced recycling banks to help them. Bottom line, all the structural reasons given for not recycling can be addressed for those willing to engage.

The capacity to handle the extra recyclate generated from the change in service was analysed as part of the decision process. The Council used to handle far greater recyclate than it does now. Over time it has processed recyclate from other authorities, the Government's bring bank service and we currently process the material from Recycle.im. If the scheme is so successful that we require extra vehicles and staff, then we would expect to see a drop in other material streams to enable other waste operatives to be used for collecting recycling. Again, the total amount of material collected will not change fundamentally, but we expect to see a shift from one container to another.

The Council is often asked why it doesn't offer a co-mingled collection where householders place all recyclate in one container that the Council takes away and sorts elsewhere. You could argue this is more convenient for householders but it involves double handling, the use of a

materials' recovery facility which inevitably involves someone at the end of a picking line manually sorting material.

Furthermore, the contamination of the resultant recyclate is much higher making it unsuitable for processing, which is the whole point of collecting it in the first place. We are aware that the Government's Waste Strategy is due for review; we welcome that review and will adapt to whatever it sets out once it becomes available. I know these things often take time to go through the proper sign-off process.

**Operational impacts.** The change in service was communicated to the crews and the new waste rounds were derived in consultation with them. It is difficult to judge exactly how people will respond and we told the crews from the very beginning that rounds would likely need to be adjusted to ensure collections were not overloaded. This we have done. Since the change in service was implemented, we have met crews to adjust rounds to ensure they are attending the Energy from Waste plant no more frequently. We are monitoring weights from a H&S perspective and will continue to tweak rounds to assist crews while not affecting the public's collection day.

Your comments about break times and other practices that could be harmful to the staff's welfare has not been borne from the change in service but from the current 'task and finish' culture which, by human nature, encourages crews to want to finish as quickly as possible, particularly during bad weather. This was an issue before the change in service. We are working with the crews, and their union, to engender a healthier culture and I can guarantee you none of the waste operatives are working past their 37 hours per week.

One area on which I completely agree with you is that waste operatives should not be suffering abuse for this change in policy. They do not deserve it and we will continue to encourage them to report any such incidences so we can deal with those members of the public directly.

Turning now to your appendix 1, it is very difficult to address any of these points as there are no dates or addresses. If you have that information, it would be very useful to have it. Again, this is highlighting the issue of those residents who do not appear to be engaging with the service or recycling. Surely the question that needs to be asked is: why should all other Douglas ratepayers suffer for these residents' reluctance? We continue to closely monitor litter, are not seeing a specific issue and, as mentioned above, there have been no reported incidences of fly tipping. The side waste issue, which is predominately what your appendix shows, is one we are working through with the crews – indeed some of the photographs I believe have come from the crews and the residents concerned.

**Cost.** Early indications are that savings are being made through diversion from the Energy from Waste plant, however this is a double-edged sword as the initiative was not about saving money but about improving recycling, so no doubt we will be criticised for saving which we hope to use to offset the rate.

It is particularly hard to quantify this when year-on-year inflation far outweighs any savings we can make. The public only sees the increase when, in reality, that increase would be significantly more if we did not look to make changes in how we provide services.

You mention one positive of the change in terms of interest in local democracy, yet there is another positive by-product as this focusses householders' minds on what, and how much, they are disposing. Often when such a service change is introduced, waste arisings reduce overall as people begin to realise how much they are throwing away, even to the point that it changes their shopping habits in the first place. That is not only better for the environment but better for them financially.

Our policy **is** about changing behaviour. We have been pleased at how quickly most residents have adapted to the new service. We continue to collect data and we are still working with both residents and management companies who are willing to engage to allay concerns and fears. Therefore I think it is too early to say that the policy isn't working overall. For most it is and, in the very short time since the service change was introduced, the Council's recycling rate has increased from its static 5%-6% to just over 15%. Over the next year we expect that to increase further.

Thank you again for reaching out to me, David, and please do consider my offer of a meeting.

Yours sincerely

**Councillor Mrs C L Wells**  
**Leader of the Council**