

MEMBER BRIEFING**HOUSEHOLD WASTE RECYCLING CENTRES – OPERATIONS DURING THE COVID-19 CRISIS****Recommendation**

It is recommended that Members:

1. note the current status of matters in relation to the opening of household waste recycling centres during the current COVID-19 lockdown measures;
2. consider the planned approach to re-opening the HWRCs outlined in the report;
3. advise the Chief Executive whether they would support the re-opening of Merseyside's HWRCs in light of conflicting Government advice over lockdown and whether journeys to HWRC services are to be considered as 'essential reasons to leave home' under the current circumstances.

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HOUSEHOLD WASTE RECYCLING CENTRES – OPERATIONS DURING THE COVID-19 CRISIS

Briefing of the Chief Executive

1. Purpose of the Briefing Note

- 1.1 This briefing note informs Members of the current status of matters in relation to the opening of Merseyside's household waste recycling centres (HWRCs) during the ongoing COVID-19 crisis.
- 1.2 The briefing also informs Members of the draft proposed plans for re-opening HWRCs under social distancing measures, along with status of preparation of site specific traffic mitigation plans.
- 1.3 The briefing asks Members to consider the issues set out within the report and advise the Chief Executive whether they would support the re-opening of Merseyside's HWRCs during the current lockdown measures or prefer to maintain HWRC closure at this time.
- 1.4 It is proposed that any decision regarding re-opening of HWRCs will be taken by the Chief Executive in consultation with the Authority Chairperson, as an Urgent Decision at the appropriate time.

2. Background

- 2.1 On Monday 23rd March 2020, societal 'lockdown' measures were put in place across the country in an attempt to restrict movement of people and to manage and mitigate the spread of the COVID-19 disease.
- 2.2 The Government has instructed and legislated that people stay at home, leaving only for one of four essential reasons, as follows:
 - shopping for basic necessities, for example food and medicine, which must be as infrequent as possible;
 - one form of exercise a day, for example a run, walk or cycle – alone or with members of your household;
 - any medical need, including to donate blood, avoid or escape risk of injury or harm or to provide care or to help a vulnerable person;

- travelling for work purposes, but only where you cannot work from home.
- 2.3 On Tuesday 24th March, the morning after the Government instruction was broadcast, Merseyside's HWRCs were closed. This was done in direct response to the very clear Government instructions to 'stay at home' except for specific essential journeys, none of which included reference to visiting an HWRC.
- 2.4 The majority of HWRCs across the country also closed during this time, including all HWRCs in the North West Region.
- 2.5 As the lockdown has progressed, many people have been required to stay at home, and household waste that might otherwise have been deposited at an HWRC has been stored at home. MRWA has advised the public this approach with its 'Waste Can Wait' media messaging, which has received positive comments locally and more widely, and has been adapted and adopted outside the Liverpool City Region.
- 2.6 However, despite the overarching Government instructions and Public Health England (PHE) advice, DEFRA has recently issued draft guidance to all local authorities for consultation, with the clear aim of pushing them to re-open HWRCs. Anecdotally, almost all local authorities have resisted the pressure inherent in the DEFRA guidance consultation, as it runs counter to instruction and advice on essential reasons for leaving the home.

3. Current Status

- 3.1 The fourteen HWRCs across Merseyside and two in Halton remain closed.

Note: this paper relates solely to the Merseyside facilities. Halton will make a separate decision with respect to their HWRCs.

- 3.2 District kerbside collections, notably residual collections, continue across Merseyside. Some services (such as recycling in St Helens and bulky & green waste in Liverpool City) have been suspended. Feedback from District Senior Officers is that whilst under some operational pressures (from social distancing guidelines and additional waste arising), all operating services are currently being delivered to satisfactory standard.
- 3.3 A very small number of HWRCs have remained open (under restricted operations) across the UK, and Wigan very recently re-opened their three HWRCs (on Friday 17th April). Greater Manchester have this week

announced they could re-open a limited number of their HWRCs in the next two weeks. Lancashire have stated they will not open until either the lockdown measures are lifted or the legislation changes. Warrington and Cheshire West & Chester have also stated they are not planning on re-opening at this stage.

- 3.4 Government instruction, underpinned by legislation, clearly states that individuals should only leave the house at this time for very limited and specific reasons, as outlined earlier in the briefing.
- 3.5 Where a householder leaves the house for a purpose other than defined, the Police have the powers to take action, including issuing of fines. Media reports indicate that these powers have been used by the police across the Country, and fines have been issued during the lockdown.
- 3.6 The lockdown (essentially an application of the rules along with social distancing advice), initiated on Monday 23rd March was reviewed and extended by the Government for a further three weeks on Thursday 16th April. The next review will take place on Thursday 7th May when Government will make a decision on lifting or extending lockdown measures. Current media reporting suggests that wholesale lifting of lockdown on 7th May is unlikely.
- 3.7 DEFRA have published a non-statutory guidance document (7th April 2020) for waste authorities entitled *Coronavirus (COVID-19): advice to local authorities on prioritising waste collections*. Summary in nature, and covering a range of issues and services, the guidance considers HWRC provision to be of 'medium priority', and suggests some journeys to HWRCs may be necessary *"to avoid rubbish building up and a public health risk."* A summary extract from the guidance, relating to HWRCs, is provided at Appendix 1 to this briefing.
- 3.8 MRWA have written to DEFRA seeking clarity on this guidance (which, in the current form, is unhelpful and conflicts with the main Government guidance), but to date has not received a response.
- 3.9 DEFRA have subsequently published (Friday 17th April) a more detailed non-statutory guidance document for consultation, specifically relating to re-opening HWRCs. The draft documents states:

"We recognise that during the Coronavirus pandemic some local authorities may be finding it difficult to maintain waste collection services. This guidance is to help local authorities reopen or to keep open household waste recycling centres (HWRCs)."

- 3.10 The document goes on to present a list of questions and key considerations for providers of HWRCs to address when re-opening or keeping open sites. It contains messages which, in Officer's view, is confusing and conflicts with the wider Government guidance to 'stay at home'. Further, it places decisions on what is and isn't an essential waste or reasonable excuse to, into the hands of the householder. Neither the police, MRWA nor Veolia are in any position to adequately 'police' what is or isn't essential waste from an individual householder's perspective.
- 3.11 MRWA responded to the HWRC re-opening guidance consultation, a copy of which was sent to Members by email on 20th April. A further iteration of the consultation draft was published on Thursday 23rd April, and it is expected that a final version will be produced imminently.
- 3.12 Other key organisations and bodies, such as the County Councils Network (CCN) and National Association of Waste Disposal Officers (NAWDO) have made representations to Government highlighting the same concerns expressed by MRWA. A copy of the recent CCN and NAWDO correspondence has previously been circulated to Members.
- 3.13 MRWA have worked with the Contractor (Veolia) to develop plans that can allow for HWRC re-opening with limited operations that comply with the current social distancing guidelines. We are likewise working with District Council highways officers and local police to assess and plan for management of anticipated impacts on roads around sites when they re-open, impacts that are expected to be significant due to a high level of demand.

4. Key Issues

- 4.1 There are many detailed issues that need to be considered in relation to the potential re-opening of HWRCs at this current time.
- 4.2 Re-opening would not align with Government's headline advice of staying at home except for one of the four essential reasons. In the absence of a clear statement from those leading the position on the COVID-19 lockdown (including Public Health England and the Police), re-opening HWRCs and encouraging a householder to travel to them would appear to be contrary to the Government's key message.
- 4.3 MRWA have written to the Police Commissioner and Chief Constable for Merseyside seeking their view as to whether a visit to an HWRC would constitute a 'Reasonable Excuse' to leave the home under their current

guidance. The Assistant Chief Constable – Local Policing & Criminal Justice (Jonathan Roy) has provided the following response:

“Legally there is no issue in law with the tip opening, however travel to the tip is not a recognised reason for travel under the lockdown restrictions government's restrictions. We do however have discretion on how we apply our enforcements as you will have seen.

I know that we have supported you in terms of assessing and planning the traffic impact but the critical piece here is the coordination across areas/counties, the standing advice from DEFRA and the Local Authority support to you in terms of traffic management. I understand that these are all being addressed through the SCG and TCG and any decisions regarding opening of sites and management of risks must go through this group to achieve that joined-up approach.”

- 4.4 The Police response, therefore, advocates that any decision on re-opening sites is made in a co-ordinated manner through the relevant Strategic forum.
- 4.5 However, as the lockdown has continued, there has been increasing interest in the HWRCs re-opening as the absence of a service that is extremely popular under ‘normal times’ is felt. In particular, the lockdown having coincided with good weather and more people being at home has led to people doing more gardening and DIY projects, with the resultant production of garden waste and rubble/similar wastes from such activities. This has also resulted in more waste arising from households generally, because there are now more people at home during the day.
- 4.6 There has been increasing media coverage and public comment that fly-tipping has increased since lockdown. Evidence from collection authorities on actual levels of fly-tipping across Merseyside has to date been mostly anecdotal. We have asked each collection authority for evidence and their own perspective in regard to the actual situation with fly-tipping, which can be briefly summarised as follows:

Liverpool

- Biggest issue is with industrial fly-tipping
- Statistics indicate 43% fewer on-street fly-tipping reports and 15% fewer alleyways fly-tipping reports compared to the same period last year

Sefton

- Small increase in fly-tipping predominantly in streets/areas around HWRCs
- Rear alleys a challenge, exacerbated by Enforcement Staff moved to other duties
- 'Normal' fly-tipping in industrial areas and rural parts of Borough

Knowsley

- Some larger 'commercial' fly-tipping incidents in rural areas, overall numbers have remained steady, not receiving complaints from residents
- Coping on fly-tip clearance with existing teams

St Helens

- Slight increase, nothing major at present. Reports from public have increased at call centre, but more people reporting same job. Teams remove what they see (not reported through call centre).
- Waste around litter bins a problem in certain areas, no major change to normal hot spot areas. Seeing more household items dumped in entries.
- Extra team out backing up usual fly-tipping teams.

Wirral

- 17% increase in fly-tips since lockdown. Increase predominantly alleyways of domestic and bulky furniture.
- A number of commercial fly-tips within rural and industrial areas, but low in comparison.
- Implemented 3 additional alleyway crews to assist, a total of 6 crews now carrying out alleyway cleansing & fly-tip removal.

4.7 The DEFRA guidance – both the summary guidance for waste collections generally, plus the more recent detailed consultation document - do not align with the main Government message and are generally viewed by MRWA Officers and key industry bodies as conflicting and adding to confusion around the Government position. The key challenges with the DEFRA documents can be summarised as:

- i) DEFRA guidance doesn't align with the main Government guidance and instructions;
- ii) there is no indication that DEFRA's approach has been considered by, or is supported by, Public Health England or Police nationally;

- iii) the guidance puts decision making into local hands – leading to a ‘post code lottery’, and localised lifting of lockdown measures, rather than one co-ordinated centrally in line with scientific advice;
- iv) the latest consultation guidance (issued Thursday 23rd April) states:

“Householders should use kerbside collections or other legal routes to dispose of their waste and only take waste to a HWRC where it cannot be stored safely at home.

“By this we mean the waste/recycling could not be stored without causing a risk of injury, health or harm to the resident or other members of their household.”

The assessment on these counts is left for individual householders to make.

- 4.8 Whilst all North West HWRCs remained closed up until last Friday, Wigan have now re-opened their three HWRCs. Our neighbouring Authorities’ HWRCs (Lancashire, Warrington, Halton and Cheshire West & Chester) remain closed at this point in time. Greater Manchester have now indicated that they will be undertaking a partial re-opening of a number of their HWRCs over the next two weeks. Discussions with Lancashire have indicated that they won’t be re-opening any of their HWRCs until either lockdown is lifted or until the legislation changes. Warrington and Cheshire West & Chester have also stated they are not considering re-opening at this time.
- 4.9 Regular contact is maintained with our neighbouring Authorities, as it is vital to understand respective approaches and in particular when an Authority is considering re-opening. Taking different approaches (as DEFRA’s guidance would allow for) risks significant cross-border migration of wastes (where one Authority’s sites are open, and another remains closed) and mixed messages to the general public.
- 4.10 Planning for eventual re-opening under lockdown and strict social distancing measures is underway. MRWA have worked with Veolia to develop a re-opening plan for the HWRC network that will take into account operating procedures, staffing & training, necessary changes to individual site infrastructure (such as barriers), cleaning regimes, site signage and the vital public communications plan. A copy of the current draft of the Veolia plan is provided in Appendix 2.

- 4.11 From the point of any decision that may be made to re-open, an estimated 1 week will be required by Veolia to finalise site operational plan details and for Veolia to mobilise the respective elements of the plan. For clarity, this does not include the mobilisation of the highways management plan.
- 4.12 MRWA officers are also working with District highways officers and local police teams to develop highways management plans for each HWRC. Some highways officers have indicated timescales of up to two weeks from request to put in place the necessary mitigation measures at respective facilities. Others have expressed concerns regarding the opening of certain sensitive HWRCs at this time.
- 4.13 The individual highways management plans are being developed as swiftly as possible, but some detailed responses are awaited at this time. A summary of the current position regarding highways mitigation plans is as follows:

Liverpool

- Draft plans have been submitted. Liverpool are currently finalising the details in conjunction with their traffic management contractor and Merseytravel.
- A final plan submission is anticipated by 30th April.

Sefton

- No draft plans have yet been submitted. Preliminary response is that queueing on the highway at any Sefton HWRC will not be feasible due to highway layout at each site.
- Police initial review recommends a delay in re-opening Formby and Sefton Meadows
- A call has been arranged between MRWA and Sefton highways for the afternoon of Friday 24th April

Knowsley

- Draft plans have been submitted, and Knowsley are finalising the plans details with their traffic management contractor.
- A final plan submission is anticipated by 30th April.

St Helens

- Final schemes and plan costings have been submitted to MRWA.
- The earliest possible installation of the proposed traffic management system is 4th May
- Both St Helens highways and police recommend the delay in re-opening of Rainhill

Wirral

- Draft plans have been submitted, Wirral are now finalising details in conjunction with police and Merseytravel
- Highways team have recommended a delay in the opening of Clatterbridge HWRC due to concerns over impact on nearby hospital
- Final plan submission anticipated by 30th April

4.14 The latest drafts of each District's highways plan is provided in Appendix 3.

5. Options

5.1 There are essentially two main options as to how the Authority may proceed at this time.

Option 1

5.2 *Keep HWRCs closed (during COVID-19 'lockdown') until such time as the Government produce clear, unambiguous guidance that allows for a member of the public to visit an HWRC as an essential journey (and lockdown measures are lifted).*

5.3 Pros:

- i) This approach fully aligns with the key Government guidance on staying at home;
- ii) It ensures optimum protection of staff and the public, minimising any possible social interaction that might increase the risk of the spread of the virus from contact at these facilities;
- iii) It allows for further detailed engagement with key stakeholders (Police, DEFRA, other WDAs and industry bodies) to ensure a fully considered, co-ordinated and aligned position (including, for example, with Halton).

Cons:

- i) Public pressure from certain areas will continue, and potentially increase as other Authorities review and re-open their own facilities;
- ii) Reduced opportunity for certain households that might be struggling to store certain wastes safely will remain;

iii) The perception that HWRCs being closed is leading to increased storage of waste at home and/or impacting on fly-tipping and increased volumes of kerbside collections will remain.

5.4 There may be circumstances where Government advice changes, where DEFRA guidance on HWRC opening is published that becomes incorporated into the reasons why someone may leave the home to travel and where Police accept that travel to an HWRC is a Reasonable Excuse. A copy of current Police guidance on what constitutes a Reasonable Excuse (to leave the home) is provided at Appendix 4.

Option 2:

5.5 *Re-open HWRCs under strictly controlled circumstances (i.e. not the usual HWRC service) for acceptance from householders of essential waste only.*

The measures that are currently proposed to be put in place are detailed in Veolia's latest draft operational plan at Appendix 2, and can be summarised as follows:

- *All sites will be opened between 08.00 and 20.00 (but hours will be subject to close monitoring to ensure sites can be effectively cleaned & serviced, and may subsequently be amended)*
- *The Permit Scheme will be suspended, and access will be solely for cars in the initial weeks (commercial-type vehicles such as white vans and cars with trailers will be denied access, until restrictions are lifted)*
- *Access will be strictly on a one-out, one-in basis with each site subject to strict number limits (e.g. maximum 3-5 cars at any given time, depending on the size/capacity of the site)*
- *No pedestrian access will be allowed*
- *Only one person will be allowed in each vehicle*
- *Site attendants will not provide assistance to members of the public*
- *Vehicles may be turned away from site if they are clearly commercial and/or where individuals are evidently not complying with the rules on social distancing*
- *Security arrangements will be put in place at the site entrances to help with management of visitors and traffic, provide advice etc.*

- *District highways officers and local police will be engaged to support with managing the potentially significant queues which might arise in the early days of re-opening. Strict traffic management measures are expected to be put in place to help mitigate any potential highways impacts.*
- *A detailed Communications Plan which will provide key messages (on websites and social media) to the public around ensuring essential visits for disposal of essential waste only*

Note: the above proposals remain under discussion with Veolia, will be subject to final agreement between the parties.

Pros:

- i) This will ensure full compliance with MRWA's legal obligation to provide places for persons resident in Merseyside to deposit their household waste.
- ii) It will address the concerns and complaints received about HWRCs having been closed.
- iii) It will allow for some (as yet unknown) mitigation of waste collection volumes.

Cons:

- i) Re-opening HWRCs at this time is anticipated to result in significant vehicle attendance and lengthy queues. There could also potentially be frustration from members of the public where queues and access waiting times are extensive.
- ii) It will present mixed messages to the general public, from a public sector body, about what is an essential reason to leave the home at this time.
- iii) It will present an increased risk of potential opportunity for spread of coronavirus.
- iv) It will put householders in the difficult position of making their own decision around what is and isn't an essential journey and what is and isn't waste which they believe presents a risk to them in the home, and one they may need to justify to Police.

6. Risk Implications

- 6.1 There are a number of risks in relation to either approach – re-opening or remaining closed. These are summarised below.

Option 1: Risks relating to remaining closed under current national lockdown guidance & measures

Identified potential risk	Proposed mitigation
1. Public and political pressure to re-open sites will continue to rise.	Ensure ongoing monitoring, engagement and good levels of public communication during the lockdown period. Keep any decision to remain closed under constant review.
2. There may well be genuine circumstances where certain householders have need to dispose of waste that is presenting certain risks to them and their household that they might otherwise have taken to an HWRC, and cannot.	Maintain high standards of public communications, signposting to available disposal and waste collection services.
3. Public and media interest around any links to fly-tipping will only continue as the HWRCs remain closed	Maintain regular dialogue with District Council Officers to ensure clarity of facts on fly-tipping. Review all available data to understand position. Ensure high standards of public communications around reasons for closures etc.
4. The longer sites remain closed, the greater the potential build-up of demand, and the larger the likely impact upon the facilities and local network on re-opening	Ensure high standards of public communication when sites re-open. Continued signposting of available collection and disposal routes whilst HWRCs remain closed. Consider all potential options for access control to mitigation high levels of interest on re-opening.

Option 2: Risks related to re-opening at the current time

Identified potential risk	Proposed mitigation
1. Potential for very significant traffic issues impacting on neighbourhoods and key businesses (such as	Develop & implement effective traffic management & mitigation plans with District highways officers and local police

supermarkets) upon re-opening due to 'pent up' demand	
2. Changes to the nature of the HWRC service to take into account social distancing controls is anticipated to lead to a slower service and very long queues	Develop good public communication to ensure reasons for measures are well understood
3. In the absence of clear, unambiguous Government guidance, risk that a householder may be challenged/fined by police for a non-essential journey – and in the absence of MRWA engagement – risk of criticism from Police/others	Engage with Police in advance of opening to clarify the approach they will adopt to HWRC visitors Ensure good communications to public on essential reasons to visit an HWRC
4. Risk of challenge/criticism of MRWA (as a public sector body), encouraging householders to make a journey for non-essential reasons and not being aligned with national policy	Monitor actions of other waste disposal authorities. Seek legal advice to support decision. Follow any DEFRA guidance that is produced, irrespective of alignment with main 'stay at home' instructions
5. Re-opening when other neighbouring Authority HWRCs remain closed (e.g. Lancashire, Warrington, Cheshire West & Chester) risks an influx of householders from neighbouring HWRCs to those in Merseyside	Seek, wherever possible, to co-ordinate opening simultaneously with neighbouring Authorities.
6. Risk of exacerbating the spread of coronavirus, with risk of increased potential for contact with contaminated individuals	Contractor to undertake detailed risk assessment and implement appropriate on-site control (social distancing) procedures.
7. Many householders may not consider advice around visits for essential waste only, and will bring whatever waste they personally deem 'essential' (e.g. garden waste, DIY waste and rubble – none of which are essential from a household health and personal safety perspective)	Ensure MRWA approach follows any DEFRA guidance. Ensure good public communications around what might and might not be considered 'essential'.
8. Whilst measures will be put in place to control social distancing at HWRCs e.g. staff will be advised not to assist members of the public, it will be extremely difficult to ensure proper social distancing in all circumstances	Contractor to undertake detailed risk assessment and implement appropriate on-site control (social distancing) procedures. Ensure good public communications and site signage underlining need to maintain social distance.

7. HR Implications

- 7.1 There are no HR implications for MRWA associated with this briefing.
- 7.2 The Contractor will be required to re-deploy staff who have been used on other Veolia operations back to HWRCs.

8. Environmental Implications

- 8.1 It is expected that a small proportion of waste that might otherwise have been deposited at an HWRC is being deposited into kerbside residual and recycling collections.
- 8.2 However, the majority of waste that MRWA (along with other Waste Disposal Authorities) are asking householders to keep at home (under the 'Waste Can Wait' message) at this time is expected to be disposed of in an HWRC at some point in the future in any case.
- 8.3 There are therefore not expected to be any significant environmental implications arising from HWRC re-opening at this current time.

9. Financial Implications

- 9.1 There are anticipated to be additional costs for re-opening during 'lockdown' measures, arising from the following:
 - i) costs incurred by District Councils Highways controls (e.g. personnel such as Enforcement Officers, sub-contractors, purchase of dedicated highways signage etc.) and, potentially, Police. These costs are not yet clear, but will become more fully understood when each District Council's and the Police's plans are finalised. It is anticipated that any costs incurred by Highways actions will be passed to MRWA.
 - ii) costs incurred by the Contractor in providing the service under the re-opening plan (e.g. use of security staff, provision of additional physical barriers within HWRCs, extra signage etc.) Again, these costs are not yet clear but will become more fully understood as Veolia's plans are developed.
- 9.2 The changes to the contractually-defined service, as proposed for both the suspension of the HWRC service from 24th March and any future re-opening under social distancing controls, will be subject to a formal and detailed contract variation which will take into account both additional costs and any savings which might arise.

- 9.3 The precise financial impacts of the changes, including re-opening under social distancing controls, are therefore not yet fully clear. If there is a significant additional cost anticipated, there will be a report to Members which may seek approval for a contribution from reserves to fund these additional, one off costs. If social distancing changes the way that the HWRC service is managed in the future, any longer term cost changes associated with that will be considered by Members both at the revised estimate for 2020/21 and as part of the budget process for 2021/22.

10. Legal Implications

- 10.1 The statutory duty, detailed in the Environmental Protection Act 1990, for Waste Disposal Authorities to ensure provision of places for householders to deposit their household waste, remains in place and is unaffected by recent legislation implemented due to the COVID-19 crisis.
- 10.2 Whilst there is nothing in the recent legislation that requires HWRCs to close, the legislation requires householders to have a 'Reasonable Excuse' to leave the home. The Reasonable Excuses are detailed both in Government guidance and in Police specific guidance (a copy of which is provided at Appendix 5).
- 10.3 There is therefore an obligation on the householder to satisfy themselves they are complying with legislation around Reasonable Excuses for leaving home, and not on MRWA in relation to opening an HWRC.
- 10.4 Legal advice is that if HWRCs were to re-open for acceptance of *essential waste only*, and that this were done in full consultation with key stakeholders and notably Merseyside Police, MRWA could reasonably argue that everything was being done in compliance with the Regulations. There is, however, no definition as to what *essential waste* actually means, and it is left to householders to determine themselves whether their journey to dispose of waste is considered by them *essential*.

11. Conclusion

- 11.1 Merseyside's HWRCs remain closed. Government main advice is clear – individuals must stay at home, leaving only for one four clearly defined reasons. A visit to an HWRC is not on that list.
- 11.2 DEFRA have issued conflicting and confusing guidance around opening of HWRCs that does not align with the Government's key messages, and leaves decisions on application of lockdown measures in respect of HWRCs in the hands of Waste Disposal Authorities.

- 11.3 Many Waste Disposal Authorities feel under some pressure to re-open HWRCs due to public demand, media reports and their own experience around fly-tipping. Certain key industry bodies believe it is inappropriate to press for re-opening in the current circumstances, and certain bodies have made representations to Government in that regard.
- 11.4 In response to concerns expressed by members of the public and the DEFRA guidance consultation, MRWA has asked its contractor to prepare a re-opening plan and has ongoing engagement with highways and local police officers on highways management measures. This is not to ask Veolia to re-open HWRCs immediately, but to ensure that an appropriate and sufficiently detailed plan is in place ready for when a decision is made to re-open, either under the current lockdown restrictions or when restrictions are partially or fully lifted at some point in the future.
- 11.5 Members are therefore asked to consider this briefing note and advise the Chief Executive whether they wish HWRCs should remain closed at this point in time (Option 1) or that they should begin to be re-opened under the operational management restrictions outlined in Option 2 (and Appendix 2) of the briefing.

ENDS

Appendix 1: Extract from DEFRA Guidance on prioritising waste collection services during the coronavirus (COVID-19) pandemic (published 7th April 2020)

8. Household Waste Recycling Centres (HWRC)

Priority: Medium

Action

If it is possible to keep HWRCs open, make sure that social distancing rules can be maintained. Always provide adequate staffing levels for health and safety and security purposes.

Risks if service reduced or stopped

There is a potential for increased fly-tipping especially if other collections fail.

Some users of HWRCs may not have capacity to store waste at home indefinitely.

Local authorities must provide places for residents to deposit their household waste at all reasonable times.

Mitigation

Consider whether priority sites can be maintained with restricted access.

Provide communications that make it clear that residents should not leave home except for essentials and ensure social distancing is maintained on sites.

Consider maintaining some places for specific groups of users that have difficulty or are unable to store waste in short term or commercial and industrial waste disposal.

Temporary reductions in HWRC services should be reviewed in line with updates to government guidance on the coronavirus pandemic.

Rationale

Some journeys to HWRCs may be necessary to avoid rubbish building up and a public health risk. Where possible key sites should be maintained and if necessary, access controlled.

Where practical a limited and controlled access service may be feasible to reduce risk of fly tipping and to provide essential access for those not able to store waste indefinitely.

Appendix 2: Veolia ES Merseyside & Halton – HWRC Re-opening Operational Plan

Appendix 3: District traffic mitigation plans – latest drafts

Appendix 4: National Police Chief’s Council – Guidance entitled “What constitutes a reasonable excuse the leave the place where you live.”