

HWRC POLICIES REVIEW
WDA/21/26

Recommendation

It is recommended that Members:

1. note the issues and challenges experienced in the delivery and management of Merseyside's Household Waste Recycling Centres;
2. consider some of the options which could be implemented through the Future Waste Services project (and future contract arrangements) to help mitigate some of those challenges;
3. approve that the proposed policy options for the changes to the delivery of the Household Waste Recycling Centre network be issued for public consultation, with the outcome and final approach to service change recommendations to be brought back to a future Authority meeting;
4. delegate the authority for determining the format of the consultation and detailed questions on the HWRC policies to be agreed by the Future Waste Services Project Board.

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HWRC POLICIES REVIEW
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Report of the Chief Executive

1. Purpose of the Report

- 1.1 To provide Members with an overview of issues and challenges experienced with delivery of existing HWRC services across Merseyside, in anticipation of the development of the new service specification for the Future Waste Services procurement exercise.
- 1.2 To present a number of options to help mitigate the challenges experienced in delivery of the HWRC network, for inclusion in the specification of the reprocured service. As highlighted in previous updates, the procurement exercise is planned to commence early 2027 and with the new HWRC service contract arrangements currently planned to go live from June 2029.
- 1.3 To seek approval for a public consultation to be undertaken on the recommended HWRC policy options, and for the outcome of that consultation to be reviewed and brought back to the Authority later in 2026 along with final service change recommendations, and for a final decision on future HWRC policy approaches to be incorporated into the new procurement exercise.
- 1.4 To seek delegation from the Authority for the detail of the final consultation exercise to be approved by the Future Waste Services Project Board.

2. Background

- 2.1 Merseyside Recycling & Waste Authority (MRWA) is the statutory waste disposal authority for Merseyside, providing waste recycling and disposal services to the residents and District Councils of Merseyside, and to Halton Council under a separate agreement.
- 2.2 One of MRWA's primary obligations is the duty to provide places where residents of Merseyside may deposit their household waste (Environmental Protection Act, EPA, 1990). It does this through the provision of 14 Household Waste Recycling Centres (HWRCs) across Merseyside and 2 in Halton. For clarity, this report focusses solely on the Merseyside HWRCs, the policies at the 2 Halton HWRCs being a matter for Halton alone. MRWA is consulting with Halton in respect of these policies and the wider Future Waste Services project, and the parties may choose to adopt an equivalent, reciprocal arrangement in relation to these policies.

- 2.3 Further, the legislation sets out that the arrangements made under the EPA 1990 duty set out above shall be such as to secure that:
- i) each HWRC is situated either within the area of the Authority or so as to be reasonably accessible to persons resident in its area;
 - ii) each HWRC is available for the deposit of waste at all reasonable times (including at least one period on the Saturday or following day of each week, except in a week in which the Saturday is 25th December or 1st January);
 - iii) each HWRC is available for the deposit of waste free of charge to persons resident in the area.

For clarity, the area of the Authority under the legislation is Merseyside and MRWA has flexibility around its HWRC provision within the bounds of the duties set out above.

- 2.4 All 16 HWRCs are currently managed by Veolia ES (Merseyside & Halton) Ltd. under a contract with MRWA, termed the Waste Management & Recycling Contract (WMRC). Commencing in May 2009, the WMRC runs until end May 2029 with a potential extension (at the Authority's discretion) for a further 5 years to May 2034.
- 2.5 At the Authority meeting of 24th April 2026, the Authority considered the Future Waste Services 'Outline Business Case' proposal and approved the recommendation to proceed with a procurement of the services currently provided under the WMRC.
- 2.6 The current HWRC services and contract arrangements were designed almost 20 years ago and apart from a small number of relatively minor changes during that time (such as changes to trade waste acceptance procedures, introduction of a van/trailer booking system and addition of new items such as vapes and NOx canisters), there hasn't been a root & branch review of the services undertaken and no substantive changes have been made during this period.
- 2.7 The procurement exercise for the replacement of the HWRC services is currently planned to take place early in 2027, and the future infrastructure and service specification is undergoing detailed review with a view to implementing the new contract (and any amendments to the services) from the start of the new contract arrangements in June 2029.

3. HWRCs - current status

- 3.1 The 14 HWRCs are geographically spread across Merseyside; 4 within Sefton, 3 within St Helens, 3 within Wirral, 2 within Liverpool and 2 within Knowsley. A site location plan is provided at Appendix 1.

- 3.2 All Merseyside's HWRCs (except for Rainhill in St Helens) are open:

1 Oct to 31 March: Mon to Sun from 08.00 to 17.00 daily

1 Apr to 30 Sept: Mon to Sun from 08.00 to 20.00 daily.

Rainhill HWRC is open:

1 Oct to 31 Mar: Mon to Fri 08:00 to 17:00; Sat 09:00 to 17:00; and Sun 09:00 to 15:00.

1 Apr to 30 Sept: Mon to Fri 08:00 to 20:00; Sat 09:00 to 18:00; and Sun 09:00 hours to 15:00.

- 3.3 The HWRCs only close on Christmas Day, Boxing Day and New Years Day each year.
- 3.4 There are no explicit restrictions or controls on access to the HWRCs by any individual (including non-Merseyside residents) visiting in a car. A number of the HWRCs are situated close to other Authority boundaries (e.g. Southport is immediately adjacent to the boundary with West Lancashire, see map in Appendix 1) and it is therefore reasonable to assume that residents from other Authority areas use the Merseyside HWRCs (on the basis of their proximity and ease of access/lack of access controls).
- 3.5 There are no explicit restrictions on the number of visits any individual or household visiting in a car may make to one of Merseyside's HWRCs in any given year.
- 3.5 Trade waste is explicitly not accepted at any of Merseyside's HWRCs. A booking system is in place for any Merseyside householder wishing to use a 'commercial-type vehicle' (van or large trailer) to deliver household waste into one of Merseyside's HWRCs, and visits in a van or with a trailer are limited to 12 in any 12 months period.

HWRC Headline statistics

- 3.6 The 14 Merseyside HWRCs receive over an estimated 3 million individual visits each year (estimates based upon available ANPR data from the 11 largest of the 14 HWRCs); these individual visits are not evenly spread throughout each day or across the week as will be highlighted later in the report.

Between the 14 Merseyside HWRCs, the sites currently handle in the region of 160,000 tonnes of materials each year. This has steadily increased in each of the last 4 years, as follows:

143,755 tonnes in 22/23

148,279 tonnes in 23/24

156,638 tonnes in 24/25

158,196 tonnes in 25/26

Of the 158,196 tonnes of input during 2025/26:

27.52% was residual waste (disposed of through the Resource Recovery Contract, RRC)

17.05% was rubble

12.28% was green waste

42.58% was general recycling (such as wood, metals, hard plastics etc.)

0.56% was sent for re-use

The recycling rate has remained relatively static for several years, as follows:

66.10% in 22/23

66.23% in 23/24

67.71% in 24/25

66.82% in 25/26.

The annual forecast net cost of the HWRC service in 2026/27 is some £23.03m per annum. This includes for Service Fees and tonnage-based costs including disposal of general residual waste through the RRC.

HWRC - Key issues

- 3.7 MRWA's HWRCs do not currently distinguish between waste being delivered from a Merseyside resident from that being delivered by a non-Merseyside resident. Merseyside is not statutorily obliged to accept waste from non-Merseyside residents.
- 3.8 Neither MRWA nor the Merseyside District Councils are funded to manage waste at the HWRCs arising from non-Merseyside residents or from trade activities.
- 3.9 MRWA has Automatic Number Plate Recognition (ANPR) systems in place at 11 of the largest 14 HWRCs. The ANPR records the date and time of visit for each individual vehicle registration. Available ANPR data shows that some vehicles are visiting multiple times to multiple sites each year, as set out in the graph at Table 1, the following being a summary of numbers of visits in 2025/26:
 - ANPR data from the 11 HWRCs recorded 2,821,408 individual visits in 25/26
 - The vast majority of visits were made by individual vehicles visiting less than 12 times per year being 535,015 individual vehicles visiting less than 12 times, a total of 1.68m visits in 2025/26.
 - There were 11,002 individual vehicles visiting more than 26 times a year (a total of 465,228 recorded visits).
 - There were 4,523 individual vehicles visiting more than 39 times a year (a total of 245,570 recorded visits).

- There were 1,808 individual vehicles using multiple sites more than 52 times a year (a total of 144,784 visits).

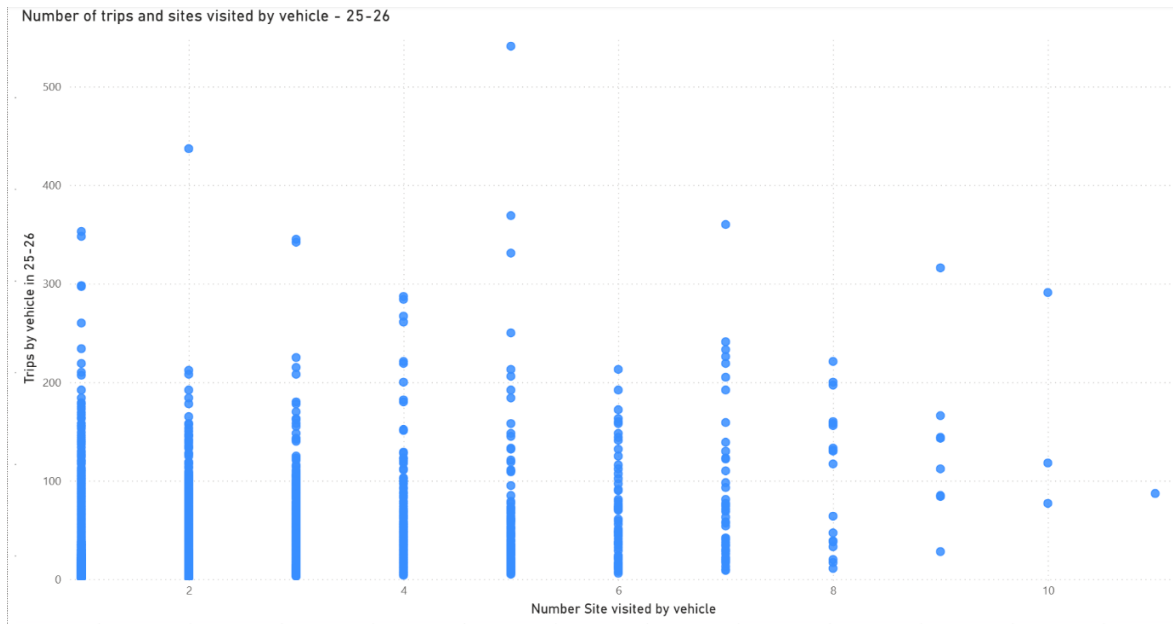


Table 1: Total number of trips and sites by individual vehicles in 2025/26

The above graph, derived from available ANPR data from 2025/26, shows a dot for each vehicle registration and plots the number of trips made by each vehicle to the number of different sites that vehicle visited.

The numbers suggest that whilst the majority of use by individual vehicles is relatively low (less than 12 visits per year), some users are going beyond what might be considered reasonable household use. Whilst we don't have any evidence to confirm as such, it may be reasonable to assume that multiple visits to multiple sites are being undertaken by individuals undertaking commercial activities.

Note: the data is derived from 11 of the 14 Merseyside HWRCs only and whilst it is cleansed to remove certain records (such as Veolia staff, operational vehicles and non-registration records), it cannot be guaranteed to be a 100% accurate record for all visits. It is therefore to be considered indicative for the purposes of this review.

We do not currently have any data to confirm visits by 'households' (rather than individual cars), so there may be some cases of visits by more than one car from a given household.

- 3.10 Visitor demand is not evenly spread across all opening days and hours. Higher demand at peak times has significant impacts on user experience (including on-site recycling activity and demand on staff resource) as well as resulting in

occasional significant queues which impact the local highway and amenity. Such queues and their local impacts are well known at many sites including Otterspool, Bidston, Southport and Old Swan amongst others. Whilst complaints are occasionally received (approximately 5 each year), many users appear to have accepted the need to queue at busy times (however other traffic impacted by such queues may not be so accepting and may not always know where to complain).

- 3.11 The total population of Merseyside was 1,551,500 (2023, based on ONS data). Forecasts based upon the average household and District Council published housing projections would suggest that by 2037, the population could be 1,750,000 and therefore demand on the HWRC network could reasonably be assumed to increase in line with such a population increase.
- 3.12 The data set out in 3.6 above shows a steady increase in total tonnes received at the HWRC network in each of the last four years and with the expected increase in local population as set out in 3.11 with further additional demands on the waste system being anticipated, this trajectory can reasonably be expected to continue. Without any systemic change or targeted intervention, the overall costs of delivering the service can therefore be expected to increase over time.
- 3.13 HWRC recycling rates under the current contract arrangements have remained broadly static for several years at between 66%-68% and are a major contributor to Merseyside's overall recycling rate. There are opportunities to improve recycling rates at the HWRCs from (for example) further diversion of material from the general waste disposals.
- 3.14 With the Emissions Trading Scheme (ETS) expected to be extended to include waste to energy in 2028, there is expected to be a significant impact on costs of residual disposal containing 'fossil carbon' (materials such as plastics and textiles), exacerbating the costs demand on the residual disposal elements of the HWRC system. Efforts therefore need to be made to remove as much fossil carbon material from the residual waste stream across Merseyside as possible, including that arising at HWRCs, both to help improve recycling rates but also to mitigate the anticipated significant impact of ETS costs.

4 Mitigation proposals

- 4.1 The HWRC services are delivered by Veolia under contract with MRWA, termed the Waste Management & Recycling Contract (WMRC). This contract is due to expire in May 2029 (subject to a potential extension) and the services are currently undergoing review through the Future Waste Services project, progress on which is separately reported to Members through the Project Board and Authority.
- 4.2 The opportunity therefore now exists to review the delivery of the HWRC services in light of the issues set out above and challenges experienced through the

delivery of the WMRC, and to incorporate changes and improvements into the specification of the new services for the replacement contract, to be implemented from June 2029.

- 4.3 Whilst the HWRC network itself is subject to general infrastructure review, the following policy changes are proposed, directly aimed at addressing the challenges set out in this report.

Proposal 1: Implement a Merseyside residents only policy

Proposal 2: Implement a Merseyside HWRC fair use policy

Proposal 3: Extend the current van/trailer booking system to cover all visits by Merseyside householders (including cars)

Proposal 4: Implement a 'no bagged general waste' policy

A description of each policy proposal follows here.

4.4 ***Proposal 1: Implement a Merseyside resident only policy***

Historically, other than for householders visiting in a van or with a large trailer, there have been no restrictions on the use of the Merseyside HWRCs based on the location where a person lives. This means someone living in (for example) West Lancashire or Cheshire West & Chester, could deposit their household waste in a Merseyside HWRC (such as Southport or Clatterbridge respectively) without restriction. This in effect means that Merseyside Councils are potentially subsidising the waste disposal costs of some residents from outside of Merseyside, disposals for which MRWA are not statutorily obliged to provide the HWRC service and neither MRWA nor Merseyside District Councils funded to accept non-Merseyside waste.

Many Authorities across the Country, including our neighbour Authorities, have resident only policies in place, and will only accept disposals at their HWRCs from householders resident within their Council area. Examples of areas with such a policy include in Chester West & Chester and Greater Manchester.

MRWA does not currently have any specific data to evidence how many non-Merseyside residents are using Merseyside HWRCs, so it is not possible to estimate what quantity of waste is being delivered in this way. However, it is reasonable to assume that implementing a resident only policy will have an impact on the number of visits (and therefore the volume of traffic/local queues) and total tonnes managed across the network, most notably at the HWRCs in closest proximity to neighbouring authorities.

A Merseyside resident only access policy would restrict use of Merseyside HWRCs for Merseyside residents only. For clarity, this would not prevent a

resident who lives in Wirral from using an HWRC in another area of Merseyside e.g. Knowsley, or vice versa. As long as a resident lives within Merseyside they could use any Merseyside HWRC. MRWA are currently in consultation with Halton on this and the other proposals with a view to considering the potential for a reciprocal arrangement between Merseyside and Halton householders using respective HWRCs.

It is proposed that Merseyside resident only access would be controlled by use of a booking system (further outlined below) through which only householders with Merseyside post-codes would be able to make a booking, as currently happens with the van/trailer booking system. Whilst there are a number of potential approaches to developing a comprehensive booking system, the precise methodology would be subject to further review and proposals from bidders through the pending procurement process and would only be implemented from the commencement of the new contract in June 2029.

4.5 ***Proposal 2: Implement an HWRC fair-use policy***

At present, there is no specified limit on the number of times any householder may visit one of Merseyside's HWRCs in a car. MRWA does however have a policy of limiting householders visiting in a commercial-type vehicle (van or with a large trailer) to 12 visits in any 12 months, managed through the online and telephone booking system.

Adopting a fair-use policy would place a reasonable limit on the number of visits any Merseyside resident could make delivering their household waste to a Merseyside HWRC in any vehicle in any given year, to ensure all have fair and reasonable access to the HWRC network without the ability for potential abuse of the service.

Typically, fair use policies cover all vehicle types including cars and place a limit or threshold on the number of visits in a given period (such as per month or per year). The fair use policy could also be applied to visits from individual households (not just specific vehicle registrations) which would help address the potential perception of unfairness in the case of a household having multiple vehicles thereby being able to deliver more waste.

Many local authorities have introduced such policies as a way of managing HWRC usage and also as a mechanism to identify and control potential commercial visitors, who should be disposing their waste through commercial waste disposal providers, not the household waste network.

Examples of fair use policies from our neighbouring authorities include:

- Cheshire West and Chester (CW&C) – each CW&C household is able to visit CW&C HWRCs 30 times in a 12-month period. A visit in a defined commercial-type vehicle or a vehicle towing a large trailer would count as two

visits. These 30 visits can be used in any way over the 12-month period, for example, spread out over 12 months or condensed into a shorter time, depending on individual needs. To monitor the number of visits residents are asked to register their vehicle and home address using a one-off process online or by paper form, with an automated system recording when a visit is made to a site.

- Greater Manchester: cars and cars with single axle trailers have a threshold of 52 visits per year. Cars with twin axle trailers and all vans and pickup trucks are considered as trigger vehicles and subject to enhanced checks and trigger vehicle visit thresholds, as follows:
 - Up to 3.5t gross vehicle weight – 18 visits per year
 - Above 3.5t gross vehicle weight – 12 visits per year
 - Car plus double axle trailer – 18 visits per year

In terms of defining what MRWA might consider 'fair use', there are clearly a wide range of potential options which could include:

Option 1 – a limit of 12 visits per year for all vehicles/households

Option 2 – a limit of 12 visits per year for vans/trailers, and then a separate limit of (for example) 26/39/52 visits for all other vehicles/households

Option 3 – separate limits for different types of vehicles/households (as per the Greater Manchester model set out above).

The final proposed approach will be subject to further work including considering feedback from the public consultation. It is therefore proposed that a range of options be put forward for the consultation and then a final fair-use proposal be compiled based upon public feedback.

4.6 ***Proposal 3: Extend the current HWRC booking system to include cars***

MRWA has operated an online booking system for Merseyside householders visiting the HWRC network in vans and vehicles with large trailers since May 2020. Prior to this time, paper Permits were issued. Details of the current MRWA van booking system can be found on the MRWA website at [Find a Recycling Centre and Book an Appointment - Merseyside Recycling and Waste Authority](#) (or www.merseysidewda.gov.uk).

The introduction of booking systems for all vehicles at HWRCs became commonplace across the country during the COVID-19 pandemic as a way of controlling the number of people on a site at any given time to comply with social distancing requirements. Sector evidence suggests that some half of English Councils now operate some form of booking system. Such systems also allow for better management of resources (staff & containers), prevent queues building up outside sites impacting the local highway and allow site users more time/space on

site and access to staff resource to ensure as much waste is recycled as effectively as possible.

Examples of waste disposal authorities currently using booking systems for all vehicles to access their HWRCs include (amongst many others):

- Birmingham City Council
- Cheshire East Council
- Kent County Council
- Milton Keynes Council
- Hampshire County Council
- Conway Council
- West Northamptonshire Council

Each takes a slightly different approach based upon local circumstances and requirements. Some (such as Kent County Council) requiring bookings for all HWRCs at all times, others (such as Cheshire East Council) require bookings as specific times such as weekends and Bank Holidays.

Evidence suggests that once HWRC bookings systems are embedded, and residents are used to using them, they have a positive impact on throughput (reducing waste tonnages compared to not having a booking system), reduce queuing and impact on the local highway and are positively received by site users. Some indicative potential benefits of booking systems are set out in the following table:

Benefit	Potential Outcomes
Operational Management and improved user experience	<ul style="list-style-type: none"> ▪ Less traffic congestion and improved resident experience ▪ Improve site safety; ▪ Manage peak demand; and ▪ Improve flow through constrained sites.
Better control of misuse	<ul style="list-style-type: none"> ▪ Reduced trade and cross-border abuse
Data and insight	<ul style="list-style-type: none"> ▪ Better planning and decision-making ▪ Collect data on site usage and demand; ▪ Improve resource planning; and ▪ Support future service redesign.
Cost savings	<ul style="list-style-type: none"> ▪ Lower waste disposal pressures ▪ Support budget management.
Improved recycling quality	<ul style="list-style-type: none"> ▪ More time for staff support and waste segregation ▪ Opportunity to engage residents with positive recycling behaviour messages during booking process

Kent County Council, for example, have a similar scale of HWRC network to MRWA operating 18 HWRCs, serving 1.6m residents and handling approximately 145,000

tonnes of waste each year. Following implementation of their HWRC booking system, Kent CC generated over £1.4m per annum in cost savings and saw a 5% increase in recycling rates all with positive site user satisfaction survey scores. A case study example of Kent County Council's booking system (extracted from their third-party booking system provider's website) is provided at Appendix 2.

Booking systems do of course have their potential downsides. It is acknowledged that introducing a booking system for all visits is a shift from the current system of visiting without restriction and will require potential visitors to proactively make a booking to visit an HWRCs. Some commonly cited concerns with booking systems are set out in the following table:

Concerns	Potential Outcome
Access and convenience	<ul style="list-style-type: none"> ▪ Reduced flexibility for spontaneous visits ▪ Potential for difficulty obtaining an appointment ▪ Perception of restricted access to a public service
Digital exclusion	<ul style="list-style-type: none"> ▪ Potential barrier for residents without internet/digital access
No-shows and inefficiency	<ul style="list-style-type: none"> ▪ Missed bookings can reduce effective capacity ▪ Administration burden to manage cancellations
Public and political risks	<ul style="list-style-type: none"> ▪ Public opposition if perceived as service reduction ▪ Reputation risks for the council
Potential behavioural risks	<p>Concerns have been raised (though evidence is mixed) around:</p> <ul style="list-style-type: none"> ▪ Increased fly-tipping ▪ Waste displacement to other areas ▪ Residents storing waste longer

Introduction of any significant change involving an all-vehicle booking system would be undertaken by contractors with experience in delivering such systems, would be well communicated to Merseyside residents in advance and would be introduced sympathetically over a period of time. Key factors associated with a successful implementation of a booking system include:

- An efficient, simple booking system that is easy to access and use
- Online/phone app and telephone booking options available
- Next day/same day/within the hour slots readily available
- Capacity not artificially restricted, slots can accommodate high traffic volumes
- Residents directly experience the benefits, such as reduced queueing, better experience on-site
- Flexible models are adopted reflecting local circumstances and needs

Discussions are underway with relevant authorities currently delivering booking systems to understand lessons learned, what has and hasn't worked in each case and where any evidence of increased fly-tipping has been seen post-implementation. Feedback from these discussions will be taken into account in the booking system design process to ensure lessons learned from authorities already using such methods can be applied to any future booking system introduced on Merseyside.

4.7 ***Proposal 4: Adopt a no 'bagged general waste' policy***

The HWRCs currently offer a 'general, non-recyclable' waste disposal container alongside a wide range of containers for recyclable items (such as garden waste, metal, hard plastics and wood). In 2025/26, 27.52% of Merseyside's HWRC waste was disposed of through these containers. This amounted to some 43,439 tonnes of residual waste which was ultimately disposed of through the Resource Recovery Contract (RRC) at a disposal cost of approximately £4.5m in that year.

These general, non-recyclable containers will often be used for the disposal of mixed bags of waste as well as items that might otherwise be recyclable but that require some effort to separate and recycle on site (including, for example, when sites are extremely busy and it is more convenient for visitors to use the one container rather than separate waste into recyclable and non-recyclable streams).

In addition to the general cost of residual disposal through the RRC, there are plans to extend the Emissions Trading Scheme (ETS) to include energy from waste (EFW) facilities from 2028. The ETS is a carbon-trading system that sets a variable price for the emission of fossil carbon from certain emitters (fossil carbon being that from oil-based products, as found in many plastics and textiles). The carbon trading price is as yet unknown, but it is expected to add a significant cost (several £millions per annum) to the disposal of any residual waste containing such plastic and textiles through the RRC.

Information would be provided to householders making a booking to visit an HWRC to encourage waste separation and improve recycling, and specific support provided on-site to assist with separating waste streams at the point of disposal into a general waste container. Working with residents in this way and requiring them to separate out all recyclable from non-recyclable waste at the HWRC (including that in bags) would greatly help increase the recycling rate and reduce both residual disposal costs and future ETS liabilities.

4.8 ***Other policies for future consideration***

There are a wider variety of other policies that could help to address the challenges set out at the start of this report. They include:

- ***Charge for DIY waste***

Waste arising from householders undertaking their own DIY works (termed ‘construction or demolition works, including preparatory works’) is defined under legislation as industrial waste. The law however sets a minimum quantity that waste disposal authorities must accept free of charge from householders at HWRCs. Above these minimum quantities, HWRCs are free to either reject acceptance of the waste or make a reasonable charge for it.

MRWA does not charge nor set a minimum acceptance level for wastes arising from a householder’s own DIY activities delivered by householders. Such waste from commercial activities is not accepted at the HWRCs.

It is expected that DIY waste deliveries into the HWRCs will reduce significantly on implementation of the policies set out earlier in the report. It is therefore proposed that this option is not included at this stage but will be subject to review once the impacts of the implementation of the other policies has been seen.

- ***Review & reduce the opening hours & days across the network***

Waste disposal authorities are free to choose HWRC opening hours and days (subject to the conditions specified in legislation, as set out in 2.3 of this report). MRWA offer generous opening availability in comparison to many other authorities. Lancashire CC for example open their HWRCs 9am – 5pm all year round with 10 of their sites open 7 days a week and 6 sites open 5 days a week (closing on various weekdays).

HWRC usage is not evenly spread across each day or across the operational week. Sites are unsurprisingly quieter early and later in the day, and busier towards the middle of each day and quieter in the middle of the week whilst being busier at weekends.

Reducing opening hours and days would reasonably be expected to result in savings derived from reduced operational costs (although the volume of waste and associated tonnage-based costs would not be expected to decrease). The precise quantum of any savings is extremely difficult to identify at this particular point. Future costs are subject to the outcome of the pending procurement exercise and we will only know the cost (and potential savings) that could arise from changing site opening availability once the future HWRC tender bids are received.

- 4.9 It is proposed that the policies set out in sections 4.4 to 4.7 above be implemented first, their impact then monitored and the further policies set out considered at a later time (in addition to any other changes which may be considered appropriate) in light of public response and the experience under new arrangements.

- 4.10 In addition, some sites will be undergoing major investment works to improve/extend the facilities on commencement of the new contract arrangements and will be unavailable for certain periods during these works. It would therefore not be appropriate to reduce days/hours of HWRC availability during this period until all works are completed.

5 Proposed approach & recommendations

- 5.1 It is proposed that public consultation is undertaken on the following:

Proposal 1: The introduction of a Merseyside resident-only policy at all Merseyside HWRCs

Proposal 2: The introduction of a fair-use policy for all Merseyside residents wishing to use Merseyside's HWRCs

Proposal 3: The booking system used for the management of residents wishing to access Merseyside's HWRCs in a van or large trailer be extended to require bookings for all users, including those in cars.

Proposal 4: Adoption of a 'no bagged general waste' policy

All above policies would (subject to the outcome of the public consultation and approval by Members) be included in the future HWRC services procurement specification and implemented across the Merseyside network in June 2029. The detail of how each of the policies will be defined and implemented remains subject to ongoing development that will also take into account public consultation feedback. It is not proposed that any be implemented any sooner than the June 2029 date.

- 5.2 Legal advice is that based upon the nature of the changes being proposed, MRWA does not appear to have a statutory duty to consult residents in advance about the proposed changes. However, given that MRWA has previously undertaken consultations when other service changes have been proposed, it is recommended that consultation be undertaken in respect of the proposals as a matter of good practice and to ensure that relevant stakeholders views are considered as part of the HWRC services development.
- 5.4 The precise details of the public consultation, including the specific wording of each of the questions asked in the consultation, are currently being developed. Subject to Members approving the recommendation to proceed to public consultation on the above outline proposals, the detailed consultation questions will be finalised and it is recommended that Members delegate authority for the final version of the public consultation document to be agreed by the Future Waste Services Project Board.

6 Risk Implications

- 6.1 There are risks with making no service changes and continuing to provide the HWRC service on its current basis into the new contract arrangements from 2029. Such risks include ongoing, uncontrolled acceptance of waste MRWA is not statutorily obliged to accept, year on year increases in tonnages delivered into the network, increasing financial liabilities arising from ETS costs and continued static recycling rates.
- 6.2 It is however also acknowledged that there are potential and perceived risks with implementing the changes proposed, some of which have been set out earlier in the report. Change in itself can sometimes be received negatively if not communicated and managed effectively with the public and can result in opposition when not implemented in a carefully considered way. However, when properly planned, communicated and managed in a phased manner, working in co-operation with the public, the proposed changes could be both well received and have positive impacts for the network and members of the public using the HWRC services.
- 6.3 Some of the ‘frequently raised concerns’ and potential risks and proposed mitigations are considered here:

“Won’t some of these changes lead to an increase in fly-tipping?”

There is no evidence to suggest that implementing the changes proposed in this report would result in otherwise law-abiding members of the public resorting to fly-tipping rather than working with the new arrangements. In specific regard to booking systems, this principle was supported by DEFRA research undertaken in 2022 in response to the increase in booking systems implemented during COVID (*‘HWRC booking systems & incidents of fly-tipping – research into possible links’ Purdy, Borrion & Crocker, Nov 2022*).

However, recognising the concerns that may arise in this regard, the following mitigations are proposed:

- An extensive, pro-active communications campaign ensuring members of the public have plenty of time to be aware of, understand the reasons for and get used to the new policies and systems;
- A sufficient lead-in time on introduction, with the service provider instructed to take a sympathetic approach for an extended period on implementation;
- A simple, user-friendly booking system making it as easy as possible to make a booking, access bookings in real-time and make bookings ‘on the day’ to allow for unplanned visits;

- Work with Merseyside District Councils to understand and monitor fly-tipping statistics and events, and any changes to occurrences of fly-tipping when HWRC changes are implemented;
- Undertake discussions with Councils that have introduced and operated booking systems historically to understand their own experience and 'lessons learned';
- MRWA to provide information for any visitors delivering waste arising from potentially commercial activities who may currently be using the HWRC network as to where they may access alternative, legally compliant disposal outlets.

“If you make a booking system online, what about residents who don’t have access to a computer or mobile phone?”

MRWA’s current booking system offers both an online booking approach and the option to make a telephone booking. Whilst online booking (either via a website or mobile phone app) will be the preferred and predominant booking method (allowing access and availability in real time), 24 hours a day, 7 days a week, a supported telephone line will be available for members of the public to call and make a booking during normal office hours.

The contractor will be instructed to ensure site staff take a sympathetic and supportive approach to visitors at the outset of the implementation of the new arrangements allowing members of the public sufficient time to get used to the new system.

“Won’t some of these changes lead to confrontation with site staff if people are getting turned away?”

Site staff working at the frontline of the HWRC services are used to working within defined operational rules with members of the public (as with the current van booking system). It is always expected this is done with politeness and professionalism, as underlined by the current provider’s ‘Expect Respect’ campaign.

The contractor will be instructed to ensure site staff take a sympathetic and supportive approach to visitors at the outset of the implementation of the new arrangements allowing members of the public sufficient time to get used to the new arrangements. We would not expect any Merseyside householder who arrived for the first time without making a booking to be prevented from accessing the HWRC; this would be an opportunity to educate about the new system.

“What if the site is closed when I arrive at my booking time?”

There may be occasions when a visitor has booked a slot, arrived at that time but has found the site temporarily closed (for example, during skip exchanges). Such

situations cannot always be planned in advance, and is a situation experienced by current visitors to the HWRC network.

Members of the public will be informed of this possibility when making a booking.

In addition, when a site is temporarily closed, a member of staff will be posted at the site entrance to engage with arriving visitors to explain what is happening and how long the temporary delay to opening may take.

Investment is being made to reconfigure and improve the infrastructure at a number of HWRCs across the network, and this is expected to mitigate the need for such closures in some cases.

“Won’t these changes impact recycling rates?”

Whilst the proposed changes are expected to lead to a reduction in overall tonnages, they are not expected to result in a drop in recycling rates. Rather, alongside other measures to be put in place through the new contract arrangements, we would reasonably expect there to be an increase in recycling rates across the sites.

This will however be monitored should the proposals be implemented to understand how the changes ultimately impact on total tonnages and actual recycling rates.

“If we get less recycling waste in, won’t that affect the amount of income the Authority could make from selling recyclates?”

MRWA currently receives an income for recyclates sold by the contractor from the HWRC network. This is expected to continue under new contract arrangements.

There are however costs associated with receiving, handling and managing the recyclates which (on average) exceed the income received. Any reduction in any wastes – including recyclates – received at the HWRC network would be expected to result in a net financial benefit for MWRA.

- 6.4 It is expected that other risks and concerns may be raised by members of the public during any agreed consultation exercise, and those risks will be considered and addressed as and when they are raised.
- 6.5 The key risk are summarised here:

Identified Risk	Likelihood Rating	Consequence Rating	Risk Value	Mitigation
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Perception of potential for an increase in fly-tipping	2	4	8	Comprehensive and timely public comms campaign. Contractor to adopt a sympathetic and supportive approach at start of new arrangements. MRWA to work with Districts to monitor and respond to fly-tipping incidents when new arrangements implemented.
Residents without access to computer or mobile phone won't be able to access the service.	1	3	3	Booking to be made available through website/app and landline telephone. Site staff to support members of the public.
Confrontation with site staff as the changes are implemented	2	4	8	Comprehensive and timely comms campaign. Site staff to adopt a sympathetic approach. Contractor to implement public engagement rules.
Potential impact on recycling rates	2	3	6	Monitoring of inputs and recycling rates, action take to address negative impacts.
Potential impact on recyclables income	2	3	6	Monitoring of financial impacts (positive or negative), action take to address negative impacts.

7 HR Implications

7.1 There are no immediate HR implications for MRWA associated with this report.

8 Legal Implications

8.1 MRWA's has a legal duty (through the Environmental Protection Act 1990 to provide places for householders resident in its area to deposit household waste.

This duty is discharged through the provision of Household Waste Recycling Centres.

- 8.2 Legal advice is that based upon the current circumstances, the Authority is unlikely to have a legal duty to consult the public about the proposed changes, although it is proposed to do so as a matter of good practice.

9 Environmental Implications

- 9.1 There are no direct environmental implications associated with this report.

10 Financial Implications

- 10.1 There are no immediate operational financial implications associated with this report (that of public consultation on the proposals as set out). Any operational costs or savings arising from the proposals will come into effect when the new HWRC contract arrangements commence in 2029. The estimated costs of these contracts are incorporated in the Authority's Medium Term Financial strategy (MTFS).

The cost of the public consultation exercise itself is expected to be accommodated within the approved 2025-26 budget.

- 10.1 Subject to the outcome of the decision and any public consultation undertaken on the proposals, there is expected to be a financial impact resulting from changes to the management of the HWRC network which will be better understood once new service tenders are received and ultimately, as the new policies are implemented and their impacts realised.

11 Conclusion

- 11.1 MRWA's HWRC network has been operating under its current contract arrangements since 2009 and hasn't during that time, been subject to a major review of operational approaches.
- 11.2 The HWRCs themselves are subject to high demand, including demand from waste MRWA is not statutorily obliged to accept, that demand occasionally impacting user experience and local highway traffic and the demand expecting to increase in-line with housing growth in the coming years.
- 11.3 Many Authorities across the country already adopt policies and operational approaches that mitigate the issues experienced across the network. With the services and contract arrangements subject to review and procurement through the Future Waste Services project, now is a timely point to prepare for adoption of new approaches as set out in the report. It is proposed that these new policies be put to public consultation and for the outcome of that consultation to inform the development of the new contract procurement specification.

11.4 It is therefore recommended that Members:

- i) note the issues and challenges experienced in the delivery and management of Merseyside's Household Waste Recycling Centres;
- ii) consider some of the options which could be implemented through the Future Waste Services project (and future contract arrangements) to help mitigate some of those challenges;
- iii) approve that the proposed options for the change in policies and procedures in the delivery of the Household Waste Recycling Centre network be issued for public consultation, with the outcome and final approach to service change recommendations to be brought back to a future Authority meeting;
- iv) delegate the authority for determining the format of the consultation and detailed questions on the HWRC policies to be agreed by the Future Waste Services Project Board.

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The background documents to this report are open to inspection in accordance with Section 100D of The Local Government Act 1972 - Nil.