

Disposal of Charity Shop Waste

A review by the
Residents' &
Environmental
Services Policy
Overview
Committee



Councillors on the Committee

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HILLINGDON
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Chairman's Foreword



The Committee undertook the review on account of the increasing volume of charity shop waste which is being disposed of at the Council's New Years Green Lane Civic Amenity site. Charities are currently not charged for this service which costs the Council £130 per tonne to dispose of. £160 per tonne is the cost which businesses have to pay to dispose of trade waste.

Data was provided for the review which indicated that some of the larger charities were using New Years Green Lane to dispose of unwanted materials which had been collected from house clearances. These materials were mainly items which could not be sold in charity shops for revenue for the charity, so they were taken to New Years Green Lane as mixed waste, and disposed of at no cost to the charity.

Evidence suggested that charities from outside the Borough were taking waste to New Years Green Lane where they were not being charged because other neighbouring waste authorities, operated a charging structure.

The Committee, when considering making its recommendation, balanced the wonderful work which local charities carried out within the Borough for residents and often in conjunction with the Council, against the cost to this Council of disposing of charity waste, free of charge.

Information was received from charities which operated in the Borough, who provided the Committee with their waste strategies, and it is apparent that most charities do not generate general waste greater than 10 tonnes. However, larger charities are generating greater volumes than this, which is why the Committee is recommending that consideration be given to introducing waste charges for those charities that exceeded a suggested annual free waste allowance of 10 tonnes.

Charities who disposed of waste over their annual allowance of 10 tonnes, would be liable to be charged at trade costs. This charging would help the Council in terms of recouping some of the costs involved in disposing of charity waste and also make charities give further consideration to their future waste strategies. I would like to thank officers for their support during the review, and also thank the witnesses and officers from other local authorities and charities, who provided information to help the Committee with its review.

Councillor Michael White
Chairman of the Residents' & Environmental Services Policy Overview Committee

Recommendations

The Residents' & Environmental Services Policy Overview Committee recommends:

Recommendation 1

That charities based within the Borough be given an annual free waste allowance of 10 tonnes for all non-recyclable waste disposed of at New Years Green Lane Civic Amenity site.

Recommendation 2

That charities based within the Borough that exceed the annual free waste allowance of 10 tonnes, be liable to be charged for the deposit of any additional non-recyclable waste, at the trade waste rate of £160 per tonne.

Recommendation 3

That charities based outside the Borough be liable for a charge of £160 per tonne for the deposit of any non-recyclable waste in line with the trade waste rate.

Recommendation 4

That Cabinet be asked to include this in the Fees and Charges schedule for Residents.

Recommendation 5

That Charities be given guidance on the options which are available in terms of disposing of charity waste at New Years Green Lane Civic Amenity site.

Background to the review

Aim of the Review

The objective of the review was to make the Committee aware of the growing amounts of charity shop waste which was being disposed of at New Years Green Lane by the Council, free of charge, and to explain the legislative background relating to this type of waste disposal.

The disposal of mixed waste currently costs the Council £130 per tonne and so Charity shop waste disposal has an appreciable financial impact for the Authority. Whilst there are local charities that benefit from this, there are also charities from outside the Borough who use the Council's Civic Amenity Site at New Years Green Lane.

The Committee undertook the review, bearing in mind the beneficial work carried out by charities for residents of the Borough, sometimes on behalf of the Council.

Witness sessions for the review were held on 4 October, 2016, 2 November 2016 and 14 December 2016 and the review was supported by the Deputy Director of Residents Services and the Council's Waste Services Manager and Waste Development Manager.

Current Position

Disposal of waste from charity shops is currently permitted by the Council, free of charge, at New Years Green Lane Civic Centre. Historically this has been long standing arrangement and is common amongst local authorities that operate waste disposal or civic amenity sites.

Recently some charities have started to dispose of greater and greater quantities of waste through New Years Green Lane. This increase in charity waste which has been brought into New Years Green Lane is thought to be increasing because neighbouring authorities are charging charities for using their sites, which is resulting in charities from outside the Borough, disposing of their waste, free of charge at this Council's facility.

Officers at the Civic Amenity site have reported that this additional charity waste was likely to be arising from charity shop activity in Buckinghamshire or Hertfordshire and possibly other London Boroughs.

Therefore, some of the charities using New Years Green Lane are not actually 'resident' in the Borough. i.e. their retail shops are outside the Borough. Many charities were now involved in house clearances. This was where charities would collect items which could be usefully sold from a charity shop and the remainder is disposed of as mixed waste. As the charity does not charge the house owner for doing this, the Council then picks up a cost that would normally be

carried by either the estate of the deceased or a waste clearance company. The charity could adopt a different approach to avoid this.

Key Information

Legal Position

Although the Council should collect domestic waste that has been donated to the charity shops for free under Section 45 of the EPA 1990, using definitions given in the Controlled Waste (England and Wales) Regulations 2012 there is scope to charge for depositing waste at NYGL site.

Under section 51 subsection 3 of the EPA 1990:

'A waste disposal authority may include in arrangements made under subsection (1)(b) above arrangements for the places provided for its area for the deposit of household waste free of charge by residents in its area to be available for the deposit of household or other controlled waste by other persons on such terms to payment (if any) as the authority determines'

Financial Cost

The rate for disposal of mixed waste by West London Waste Authority is £130 per tonne. The waste delivered by the various charities into New Years Green Lane in the financial year 15/16 and its cost to the Council is as follows:

RSPCA = 115.6 tonnes - £15,143
Trinity = 77.02 tonnes - £10,089
Thames Hospice = 44.82 tonnes - £5,871
Harlington Hospice = 8.62 tonnes - £1129
Michael Sobell = 7.82 tonnes - £1024
P3 = 7.38 tonnes - £966
Hillingdon Partnership = 0.44 tonnes - £57.64

The total weight was 262 tonnes, costing a total of £34,279 to dispose of. If this waste had been treated purely as trade waste, where the rate per tonne is £160, this charity waste would theoretically have brought in revenue to the Council of £41,872, with a notional profit element of £7,593.

Findings of the review

To help the Committee with the review, a consultation was carried out with a number of other local authorities to look at their policies regarding disposal of charity waste.

Other Waste Authorities

The London Borough of Ealing had no formal policy regarding the acceptance of charity waste at Civic Amenity sites in their Borough. Their policy was that generally charities delivering waste for recycling were not charged.

A charge was made at normal commercial rates for all other charity waste. The only exceptions would be where a charity had carried out specific works in support of local community activity and disposal had been arranged in advance. This was an informal arrangement, on a case by case basis.

The review heard from an officer from the London Borough of Harrow who reported that the Waste Teams at Harrow did charge some charities for waste disposal. Charity waste was collected on a weekly basis via the regular collection service.

However, the Committee was provided with the following information with a sample of what other local authorities' policies were in relation to acceptance of waste from charities.

North London Waste Authority (NWLA)

Barnet	A charity must contact London Waste Ltd.
Camden	Charities must prove they were based in the NWLA.
Enfield	The charity can only deposit 5 tonnes of waste each year at one of the three sites.
Hackney	Within the NWLA area (sites with weighbridges).
Haringey	If a charity exceeded their maximum limit they were asked to take the additional waste to a privately operated waste transfer station.
Islington	No information provided
Waltham Forest	No information provided

Western Riverside Waste Authority (WRWA)

Royal Borough of Kensington and Chelsea	A charity must contact WRWA before disposal of waste
Hammersmith & Fulham	Charities must prove they were based in WRWA area and registered with the Charity commission.
Lambeth	A charity can only deposit 5 tonnes of waste each year free of charge.
Wandsworth	No information provided

East London Waste Authority

In relation to Barking and Dagenham, Havering, Newham and Redbridge, there were generally no policies in place or charging regime as no concerns had been expressed regarding the disposal of charity waste.

Sample of Unitary authorities

Bexley	Set limit of 2 tonnes per month free of charge, with anything additional paid for at the commercial rate.
Croydon	No formal policy - One charity which carried out gardening work for vulnerable adults was allowed to use one of the disposal sites.
Lewisham	No concerns at present regarding charity waste.
Sutton	Charities and voluntary organisations were able to apply for an exemption permit which allowed them to access Household Reuse and Recycling Centres. Only recyclable/reusable materials were allowed to be taken to the site, and restrictions were placed on the amount of waste they were able to take.

Surrey County Council

Officers at Surrey County Council reported that there was an application process in place, whereby, charities had to contact the waste facility with a request to take charity waste to the facility. An application form had to be completed which had to be considered by officers.

All this information is logged in and the monitoring of charity organisation's tonnages brought in is made.

Surrey County Council have '15' Community Recycling Centres, of which '5' are attached to Waste Transfer Stations. If it is agreed to accept charity waste, the Council will only do so on the basis that charities deliver the waste to one of the Council's Waste Transfer Stations, to enable the logging of it, and to record the tonnage brought in.

Surrey does not accept waste from any of the large national/international charities, because of the large number of them throughout the county. Their officers believe that these large charities should have some kind of waste management process in place.

Surrey does receive requests from scout group 'jumble sales', and provision is made for this waste. There are numerous other 'smaller' charities operating within Surrey that have 'Shops' and larger warehouses for furniture, but there is no policy on the waste which results from these.

Buckinghamshire County Council (BBC)

Buckinghamshire has contained in its waste policy a section which refers to charities. All charities wishing to use BCC Household Recycling Centres (HRCs) for the first time must be registered as licensed waste carriers prior to accessing any BCC HRC.

Charities must show their waste carriers licence or exemption (as applicable) when disposing of waste at BCC HRCs. Charities are required to apply for a permit via the BCC web portal.

Charities will have access to HRCs to deposit the waste types detailed in the policy, free of charge, providing they are using any of the permitted vehicles.

The Committee noted that from the examples given, there was not a consistent approach to the disposal of charity waste, although Hillingdon seemed to be unique, in terms of the volume of charity waste disposed of at New Years Green Lane, and that some of this waste was not from within the Borough.

Information from Charities

During the review, the Committee received information from a number of charities on their waste strategies which would help the Committee formulate a view on any proposed charging regime for the disposal of charity waste.

The Committee received information from Michael Sobell House, which was a charity which operated in the Borough.

This charity had three charity shops and a warehouse, all based in the Borough. The organisation provided a van collection service (primarily in the Borough of Hillingdon) to local residents and collected donated goods from private houses, businesses, pubs, clubs etc. and people's places of work.

All donated clothing, shoes, handbags, small working electrical products and similar household items were either sold in the charity's shops, or ethically recycled by a certified third party.

Metal articles which could not be sold were taken to an approved scrap metal merchant. Books were sold in shops or markets with any unsaleable books recycled for pulp. All of these routes provided much needed income for the charity.

Ebay was used for selling items, which included furniture. The charity did not perform general house clearances, but the organisation did select only those items from houses, which they could sell.

The strategy was to recycle as far as possible, as this brought in revenue for the charity. Only items which proved to be damaged, broken or otherwise unsaleable were taken to New Years Green Lane Civic Amenity Site.

The Committee noted that the charity supported a hospice, which provided an invaluable service to the Borough's local community.

The British Heart Foundation's Waste & Recycling Manager provided the review with details of the organisation's waste disposal strategy. The Committee was informed that the organisation had merchants that collected unsaleable items, primarily for reuse as follows:

- Textiles were sorted and exported, with a proportion recycled for wipers, felt, flocking etc.. in the UK.
- Bric-a-brac was sorted and exported and the following was recycled: glass, ceramics, plastics, metal.
- Books were sold online and recycled at a UK paper mill.
- Cardboard was recycled.

The Committee was informed that there was a fraction which the organisation could not re-use or recycle, which included plastic bags that the donations came in, but these were disposed of, along with the shop's own waste through a commercial collection service. The only items which the organisation had difficulty with, were unsaleable furniture and electrical goods.

The British Heart Foundation did not have any stores within the Borough so selling these items was not an issue for the Council. However, elsewhere they would always seek to return these to the municipal waste stream via household waste recycling centres or to transfer station.

The Chief Executive Officer of Age UK Hillingdon attended a witness session and provided the Committee with information on his organisation's waste strategy.

The Committee was informed that there were two Age UK charity shops within the Borough and the shops mainly dealt with clothes. The charity did not undertake house clearances and waste was taken away in trade wheelie bins which the charity paid for.

Conclusions

From the written evidence provided, the evidence from witnesses and the research carried out into the policies of other waste authorities on the disposal of charity waste, it did appear that the larger charities generated the largest proportion of the waste which was disposed of at New Years Green Lane.

Discussion took place on the evidence which had been received from the charities who had responded to requests for information on their waste strategies, together with the policies adopted by other waste authorities and it was agreed that the best way forward was to consider introducing an annual allowance of waste solely for local charities which they would not pay for.

From contact with a number of local authorities, there was a variety of ways in which charity waste was dealt with. There appeared to be no consistent approach, with waste authorities generally accepting all charity waste.

The Committee acknowledged the work which charities carried out throughout the Borough for residents, but the rising costs to the Council of the disposal of mixed waste which originated from charity shops did have an appreciable financial impact for the authority. Whilst there were local charities that benefited from this, there were also charities from outside the Borough who used the Council's Civic Amenity Site at New Years Green Lane.

The Committee was informed that a process could be put in place at New Years Green Lane to measure amounts of waste each charity deposited. All charities would have their vehicles weighed on entering the Civic Amenity Site when loaded, and on leaving the site after tipping. This would automatically record the weight. Accounts would be set up which showed the accumulated weight tipped. Once the suggested allowance (10 tonnes per annum) had been reached, charges would be made as agreed at trade costs.

The Committee noted that this would not have any impact on the smaller charities who presently did not deposit waste greater than 10 tonnes, but it would provide the Council with revenue towards the cost to the Council of disposing of charity waste.

The importance was stressed of providing guidance to charities on what could be disposed of at the Civic Amenity site, to ensure there was no confusion when the proposed charges were introduced. It was noted that there would still be the regular waste collection from charities and that this would continue even if the proposed charges were introduced.

Terms of Reference of the review

1. To examine fluctuations in the tonnages of waste disposed of through New Years Green Lane over the past 3-4 years and how this has changed;
2. To examine the current and predicted future disposal costs to the Council;
3. The activities of the various charities bringing waste to New Years Green Lane, for disposal, where these charities operate in the main and what beneficial work is done by the charities in the Borough;
4. To look at options available, in terms of allowing disposal and ways of mitigating costs if appropriate and report to Cabinet as appropriate.

Witnesses

Session 1 –21 September 2016

Nigel Dicker - Deputy Director of Residents Services - LBH

Colin Russell - Waste Services Manager - LBH

Session 2 – 27 October 2016

Alan Whiting - Waste Management - London Borough of Harrow

Written submission from British Heart Foundation

Written submission from Michael Sobell House

SESSION 3 – 22 November 2016

Peter Okali - Chief Executive Office - Age UK Hillingdon

Robert Williams - Waste Development Manager - LBH