



TEEP ASSESSMENT

INTRODUCTION

Epping Forest DC (EFDC) is procuring a contract for the provision of waste collection and street cleansing services and is now (April 2014) at the stage of evaluating final tenders. The contract is being procured using the Competitive Dialogue (CD) process and WYG is providing technical support to the Council for the procurement.

The current methodology for collecting waste at EFDC is:

- To collect residual household waste fortnightly from wheeled-bins;
- To collect food waste and garden waste mixed weekly from wheeled-bins;
- To collect glass fortnightly from boxes; and
- To collect other dry recyclables (including paper, cardboard, card, plastic bottles, mixed plastics and steel & aluminium cans) co-mingled in sacks provided by EFDC fortnightly (on the same week that glass is collected and on the alternate week to residual household waste).

EFDC does not currently provide a commercial waste service.

As part of the procurement, EFDC has considered a number of different methodologies for collecting waste in the future: indeed, this was one of the reasons that the CD procedure was used.

EFDC has, during the procurement, been fully cognisant of the requirements of the EU Waste Framework Directive (WFD) 2008 and the Waste England and Wales Regulations 2011 which flow from it. The Regulations (which were the subject of a judicial review) include Regulation 13 regarding the collection of glass, metal, paper and plastic for recycling.

EFDC has also, during the procurement, been aware that the requirement of Regulation 13 is that these materials (i.e. glass, metal, paper and plastic for recycling) should be collected separately: but may be collected on a different basis in certain circumstances which are where it can be shown that it is not technically, economically or environmentally practicable (TEEP).

Accordingly, through the procurement, each of the options for collecting recyclables has been considered and tested using TEEP criteria: although no



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official guidance as to how this was to be done was available during the procurement process prior to the call for final tenders.

In late April 2014 (final tenders for EFDC were returned on 4 April) WRAP circulated its Waste Regulations Route Map. WYG was asked by EFDC to check the TEEP tests carried out and assess its chosen methodology on the basis of this Route Map.

EFDC CURRENT METHODOLOGY

It is worth noting that the current methodology for waste collection predates the WFD; and was developed in conjunction with the Waste Disposal authority (WDA) Essex County Council.

THE PROCUREMENT PROCESS

The procurement began with an OJEU notice published in June 2013.

With the exception of Cory, we believe that all private sector organisations that provide waste and recycling collections to councils in the UK were shortlisted: meaning that there was good engagement in the process by industry.

Bidders were invited to bid for the contract on the basis of the current collection methodology: and also to propose alternative methods of collection.

No bidder proposed a methodology where all dry recyclables were collected separately. There were however, in addition to proposals for the current methodology:

- A fully co-mingled service for dry recyclables (in some cases using sacks and in some cases using wheeled-bins)
- A variant on the current two-stream methodology, whereby paper and card were collected as a separate stream but with all other materials collected co-mingled from wheeled-bins.



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In terms of these two variants, the latter was one of the most expensive options offered (and at a cost greater than the current budget). As a result of the first stage evaluation process, the bidder offering this option was not taken forward to the next (second) stage, since the offer made was not one of the five most economically advantageous tenders.

During the second stage of the procurement bidders were still invited to submit variants: again no bidder proposed a methodology where all dry recyclables were collected separately. In deciding upon what methodology should be specified at final tender stage, EFDC officers (supported by WYG) undertook a TEEP test, devising its own methodology (since no official published guidance was available: although the outputs from a number of DEFRA presentations was considered).

The final decision was to collect as per the current methodology: and to include for a commercial waste service also.



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EFDC'S OWN TEEP ASSESSMENT

The TEEP assessment undertaken prior to final tender stage used a matrix under which the following assessments were made:

Technical

- The technical capability of the MRFs proposed by bidders, in terms of meeting the requirements of recycling as much as possible while producing good quality recyclables
- The practicabilities as regards the storage of collection containers, based upon local knowledge and Member opinion (including public opinion expressed to Members)
- The type and number of vehicles for collection
- The practicabilities of collecting in the locality

Environmental

- Emissions in terms of vehicle movements, number of vehicles and vehicle types
- The travelling distance to treatment facilities
- The volume of recyclate that would be collected and recycled
- Local environmental concerns
- Local amenity
- Street blight (e.g. that caused by additional wheeled bins on the streets)

Economic

- The combined cost of collection and treatment, less income from recyclables, as expressed by tender returns, including vehicle and fuel costs
- The effect upon costs of different volumes collected, including treatment costs for materials not collected / recycled
- The cost of communications etc. associated with different systems of collection / treatment
- The available budget (both capital and revenue)

The alternatives were scored as to whether they would, relative to the current system:

- Have a wholly negative impact; or
- Have a mainly negative impact; or



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- Have a neutral impact; or
- Have a mainly positive impact; or
- Have a wholly positive impact.

Following the scoring process, as set out on the attachment, the current system was deemed the most technically, environmentally and economically practicable: with the addition of other materials in the co-mingled dry recycling mix (whilst keeping glass separate).



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USING THE WRAP ROUTE MAP

With the benefit of now having the WRAP Route Map to hand, the following commentary works its way through the various stages.

Step 1

Here EFDC should consider the waste collections covered; and the current waste collection system.

The waste collections being covered are household waste plus commercial waste that can be collected by the Council's contractor.

The current waste collection system does collect the four materials (glass, metal, paper and plastic) for recycling: but only glass is collected as a separate waste stream.

Some additional materials (textiles, shoes, Tetrapak) are collected using bring sites.

The WRAP guidance also refers to oil: and EFDC had been running a trial for the collection of this but which was unsuccessful.

The WRAP guidance also refers to the collection of food and garden waste: and the EFDC system collects these waste streams.

The WRAP guidance also refers to the collection of bulky waste and the system collects this and applies a waste hierarchy promoting reuse and recycling.

The costs and waste composition were known (and the latter included in the contract documentation).

Step 2

Here EFDC should consider how each waste stream is managed and what waste is recycled.

Residual household waste is not currently recycled: but when the WDA opens its MBT facility some of it will be.



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Dry recyclate collected is all recycled, except for fines and contaminants. During the procurement process, the degree of contamination and fines was measured and actions were taken to reduce contaminants. Additionally, the contract documentation set out targets and processes to ensure optimum performance. By collecting glass separately the amount of glass going to re-melt is optimised.

Food and garden waste collected separately is also treated for composting. As noted, bulky waste is also recycled where it can be.

Materials from bring sites are (apart from contaminants) also recycled.

Step 3

Step 3 relates to the waste hierarchy: which has been applied throughout the process.

Step 4

At this stage a number of questions are asked in relation to the four dry streams of glass, metal, paper and plastic. Working through these questions:

- Does EFDC collect glass, metal, paper and plastic for recycling? Yes
- Are separate collections in place? For glass, yes (so likely to be compliant); for other streams, no (so necessity and practicability questions to be answered)
- Are separate collections necessary to ensure that waste is recycled? No
- Is there an approach to separate collection that is technically, environmentally and economically practicable?

Necessity test:

Here the quality and quantity of recycling is considered.

In terms of quantity, EFDC considered carefully evidence supplied by WYG (as set out in the Table below), which showed that:

- EFDC collected at the kerbside 253 kg per household per annum of dry recycling in 2011/12



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- This meant that, in terms of quantity collected and recycled, EFDC was the 11th equal best among all authorities in the UK and 9th equal best amongst waste collection authorities
- Of those collecting greater volumes than EFDC, only one collects on a kerbside-sort basis (North Somerset – and the difference is 2 kg per household per annum); whereas all of the others, except Windsor & Maidenhead, collect fully co-mingled – in other words, glass is included in the mix
- 20 of the top 30 performers collect fully co-mingled dry recyclables, whereas only one of this top 30 (North Somerset) collects on a kerbside-sort basis
- Conversely (not shown in the table below but noted in WYG's report available via the WYG website) among the bottom 30 performers the reverse is true – 25 out of 30 practice a form of kerbside-sort
- Further a number of these low-performers (e.g. LB Brent, Ashford, Rother, Eastbourne, Isle of Wight) have since abandoned kerbside-sort and either moved to a fully co-mingled service or to one that collects two-stream as at EFDC (i.e. glass separate, all other materials co-mingled) and report significantly higher capture rates

Table: Collection Details for the Top 30 Kerbside Dry Recycling Authorities in 2011/12

Rank	Authority	WYG client	Kerbside Recycling kg/hh/yr	Type	% Co-mingled	Recycling					Refuse			
						Freq.	Wheeled Bins	Sacks/Other	Kerbside Boxes	Freq.	Wheeled Bins	Sacks/Other	Communal	
1	South Oxfordshire		310	C	100	F	96%	4%		F	90%	4%	5%	
2	Surrey Heath		291	C	100	F	98%	1%		F	89%	2%	8%	
3	Vale of White		282	C	100	F	97%	3%		F	91%	3%	7%	
4	Windsor and		276	O	76%	W	100			W	85%	5%	10	
5	Lichfield		267	C	100	F	100		0%	F	96%	1%	3%	
6	Elmbridge		263	C	100	F	96%		4%	F	88%	4%	8%	
7	Mole Valley		263	C	100	F	85%	16		F	85%	10	6%	
8	Rochford		261	C	99%	F	99%			F	100		0%	
9	South Kesteven		258	C	100	F	100			F	100			
1	North Somerset		255	S	0%	W			92	F	83%	8%	8%	
1	Castle Point		253	C/g	77%	F		100	100	F		100		



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1	Epping Forest	253	C/g	78%	F	5%	95	95	F	91%	3%	5%
1	Tamworth	252	C	100	F	100			F	100		
1	Cannock Chase	250	C	100	F	100			F	100		0%
1	Rutland	249	C	100	F	99%	1%		F	96%	1%	3%
1	Stratford-on-Avon	249	C	100	F	96%		4%	F	94%	4%	2%
1	South	249	C/p	66%	F	100		0%	F	95%	0%	4%
1	West Oxfordshire	245	O	26%	W	5%		95	F	94%	1%	5%
1	Basildon	244	C/g	78%	F		93	98	W		90	9%
2	Wychavon	241	C	100	F	90%	10	7%	F	90%	7%	3%
2	Huntingdonshire	240	C	100	F	88%	12		F	92%	4%	5%
2	Woking	239	C	100	F	93%	7%		F	86%	4%	10
2	North Kesteven	238	C	100	F	99%			F	99%		
2	Mid Sussex	237	C	100	F	99%			F	99%		
2	South Holland	234	C	100	W		100		W		100	
2	Caerphilly	232	C	100	W	71%	1%	27	W	98%	2%	
2	Charnwood	231	C/g	88%	F	98%	2%	98	F	98%	2%	
2	Guildford	231	O	17%	W	8%	9%	83	F	86%	9%	6%
2	Central	230	C/g	82%	F	72%	16	12	F	91%	5%	4%
3	Spelthorne	229	C	100	F	94%			F	89%	0%	11

In terms of volume, then, the argument runs against moving to kerbside-sort and (if anything) toward co-mingling further as well as the status quo

In deciding to retain the status quo, EFDC has also considered the quality of the materials recycled: and this has including discussing this matter carefully with all tenderers and reflecting the outcome of those discussions in the contract documentation.

As well as discussing this matter at dialogue, EFDC carried out sampling of the dry recyclate collected during February 2014: the sampling involved staff from Sita (the current collection contractor), Nordic (the current MRF operator), EFDC and WYG. The results of this sampling have led to action by EFDC, in terms of communications to its residents to reduce contamination; and to further refinements to the contract documentation.

The contract documentation now states that:



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- The Council's aim is that dry recyclate collected should only include 5% as a maximum of non-targeted materials;
- That of those targeted materials, some 98% as a minimum should be of a size greater than 45mm, meaning that they can be more easily recycled
- That the Council therefore expects its contractor to recycle at least 93% of the recyclate collected (and this is a contractor responsibility)

Further: the tenderers are required to demonstrate how they will comply with these requirements in the Method Statements submitted with their tender; and these Method Statements were rigorously evaluated. As part of the evaluation it has been noted that the winning tenderer is able to accept a far greater range of materials for recycling (e.g. Tetrapak, foil, telephone directories and catalogues) as well as not treating glass collected in the co-mingled fraction as a contaminant. All of these actions will improve the quantity and quality of the recyclables.

It should be clear that EFDC has considered the quality and quantity of recycled material arising most carefully.

Practicability test;

Here the three areas to be addressed are: is the separate collection of each material stream economically, environmentally or technically impracticable?

Fundamentally, EFDC has engaged with industry and taken advice from its technical adviser to collect recyclables in the most economic, environmental and technically practical fashion that it can. Indeed, the whole procurement was carried out with no fixed ideas as to how recyclables were to be collected – save that the Council wished to:

- In economic terms, use a system which collects waste in a manner which is as economical as possible, while also maintaining high quality: this concern for is reflected in the evaluation criteria where price has been a significant factor, but never to the exclusion or diminution of quality – at final tender stage, price and quality were assessed equally.
- Also in economic terms, use a system whereby recycling could be increased in terms of the overall recycling rate and in the range of



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materials that could be collected at the kerbside and recycled, but within the current cost envelope.

- In environmental terms, increase the recycling rate and reduce the volume of waste going to landfill (working in conjunction with the WDA).
- In environmental terms, reduce the number of vehicle passes and carbon emissions generally: and to evaluate tenders in that regard.
- In terms of technical practicability, to constantly seek the views of potential service providers and to evaluate these, taking into account cost and performance as described above.
- In terms of technical practicability, to seek the views of Members and Officers, as well as considering data from other authorities, so that the collection system is practical for residents to use and to participate in as much as possible.

The results of this process have led to the chosen system being chosen because it is seen as more technically practicable, environmental and economic than other systems.

Step 5

At this stage sign-off is required.

Although the original decision made was approved by the Cabinet, and had involved the Head of service and legal representative (as recommended by WRAP) it is felt that this updated assessment should also be formally approved by Cabinet as part of the contract award.

LA/WYG/4.14