



## Associated Waste Management Ltd – TEEP Policy Statement

Advisory position statement for Active General Waste and Recyclable Waste.

According to draft guidance prepared by Defra (the Department for Environment Food and Rural Affairs):

“The revised European Waste Framework Directive 2008/98/EC states that four waste streams – namely paper, metal, plastic and glass – need to be collected separately from 01 January 2015, “where technically, environmentally and economically practicable [TEEP] and appropriate to meet the necessary quality standards for the relevant recycling sectors”. The requirement for separate collection of these four streams (subject to TEEP considerations) applies to both municipal (household) and commercial waste”.

**‘Technically practicable’** means that the separate collection may be implemented through a system which has been technically developed and proven to function in practice.

**‘Environmentally practicable’** should be understood such that the added value of ecological benefits justifies possible negative environmental effects of the separate collection (e.g. additional emissions from transport).

**‘Economically practicable’** refers to a separate collection which does not cause excessive costs in comparison with the treatment of a non-separated waste stream, considering the added value of recovery and recycling and the principle of proportionality.

**‘Necessary’ in regard to high quality recycling:** The benchmark of “high quality” should be taken as meaning that the recyclate is similar in both quality and quantity to that achieved with good separate collection and is therefore able to be used by preprocessors’ for turning back into a product of similar quality to what it was originally.



## Commentary on TEEP

According to the Environmental Services Association (ESA), the UK waste industry's trade body, UK regulators will want to see at least a commingled recycling collection (addressing the four stated waste streams) and a general waste collection. The draft Defra guidance (referred to above) states that "two or more waste streams may be collected using a commingled system if the system achieves high quality recycling. Hybrid solutions are possible, whereby separate collection is necessary for one stream but not the others."

TEEP has received extensive media attention. However, other than an incomplete document, there is no formal guidance from Defra on what local authorities and businesses need to do to ensure they comply with the rules. The Environment Agency has issued a guidance note, in which they state that enforcement action will only be taken 'where necessary' and it aims to keep it to 'an absolute minimum'. The Environment Agency has also stated that: "Practicable solutions will vary according to the type, size and make-up etc of each Waste Collection Authority. Different solutions may also be practicable in different neighbourhoods. We will expect to see that the collection authority has thoroughly reviewed the issue based on evidence and can present a clear audit trail of their decisions."

The advisory position effects in the main Local Authorities only and AWM Ltd remains TEEP compliant with its extensive MRF processing and the continuation of its off take commodity contracts maintaining internal quality controls.

AWM management and Account Managers are happy to share this information with all its current and prospective clients.

## How can AWM Ltd help you with TEEP?

If you would like to ensure that your recycling and waste collection complies with TEEP regulations, AWM Ltd can help. We can carry out an analysis of the recycling and waste produced at your organisation and ensure that both the collection systems and subsequent processing is TEEP compliant.

TJ Shapcott

1<sup>st</sup> January 2015