

## Waste Management Follow-up – Cardiff Council

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This document is also available in Welsh.

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Overall, we found that that the Council is making reasonable progress with addressing the recommendations from our 2022 waste report, but work remains to address them fully. The Council is implementing its recycling strategy and work is ongoing to develop its plans to improve its waste and recycling service, but recycling performance has not met Welsh Government targets, running the risk of incurring penalties.

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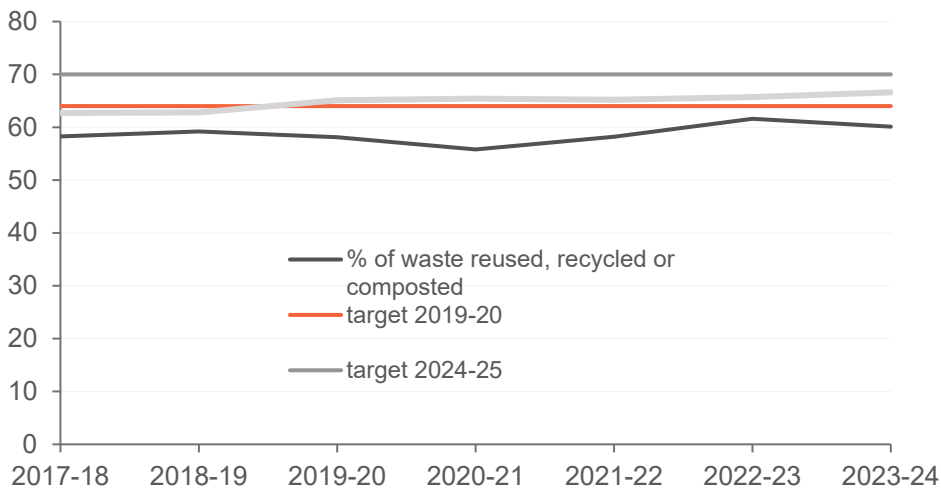
# Summary report

## Summary

### What we reviewed and why

- 1 The Welsh Government has set targets for the recycling and re-use of municipal waste in Wales. The Welsh Government can levy financial penalties for non-compliance. The target for 2019-20 was 64% and the target for 2024-25 is 70%. Cardiff Council's (the Council) performance in 2023-24 was 60.1% and it estimates that it will not achieve the 70% recycling target until 2026-27.
- 2 The Council's recycling performance is currently one of the lowest in Wales. However, we recognise that the Council's recycling performance is better than comparable cities in England.
- 3 As shown in **Exhibit 1** below, the Council has a history of low recycling performance compared to Welsh statutory recycling targets.

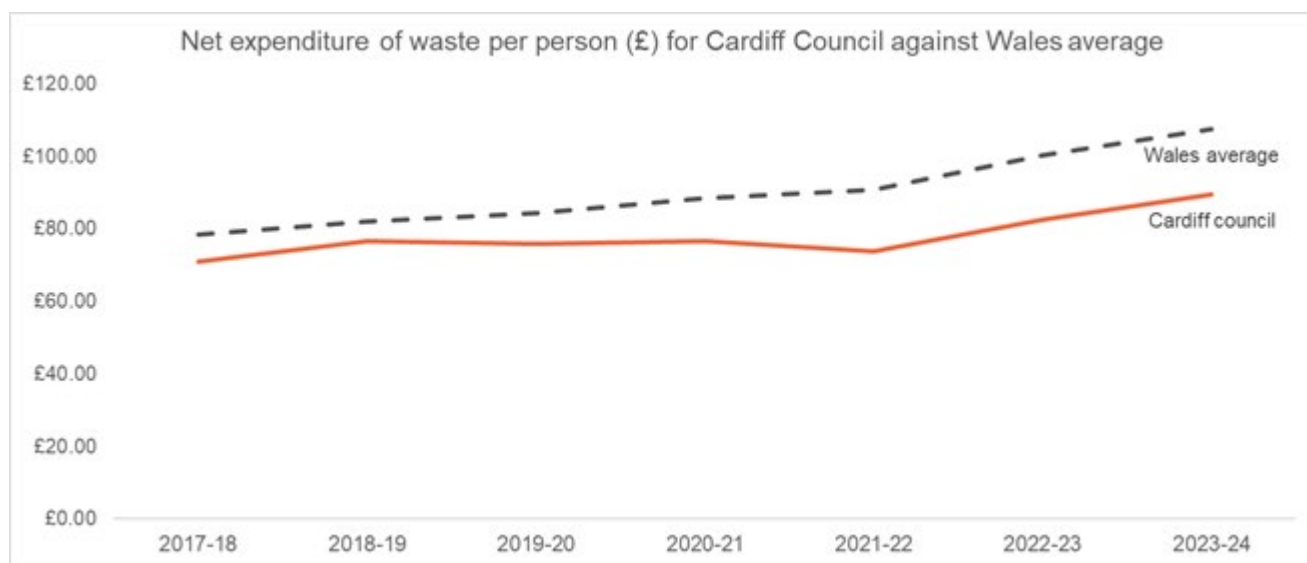
**Exhibit 1: waste reused, recycled, or composted, Cardiff Council, 2017-18 to 2023-24**



Source: [Annual reuse/recycling/composting rates by local authority, Stats Wales](#)

- 4 The total expenditure on waste in Cardiff is the highest in Wales and its spending per person has broadly increased in the last five years (with the exception of 2021-22 where it reduced). However, as shown in **Exhibit 2** below the Council's net expenditure on waste per person is well below the Wales average and is one of the lowest in Wales in both 2022-23 and 2023-24.

**Exhibit 2: net expenditure on waste per person (£) for Cardiff Council against Wales average**



Source: Population estimates by local authority and year and net expenditure on waste from Stats Wales

- 5 We have conducted two reviews of the waste and recycling service at the Council. In March 2020, we looked at the Council's arrangements to reduce waste taken to landfill and increase recycling rates to achieve Welsh Government targets. We found that the Council's focus was on resolving longstanding operational issues, which meant that it was unable to improve its recycling performance. It was only at a very early stage of deciding what its future direction would be in terms of its recycling strategy, how it would get there and what it might cost.
- 6 In 2022, we conducted a further review to consider how the Council was planning to reduce waste and improve its recycling performance. We found that the Council had comparatively poor recycling rates in Wales and needed to take urgent action to improve its recycling performance.
- 7 The purpose of our follow-up review in 2024 was to understand the Council's progress in addressing the recommendations raised in our 2022 report.

## What we found

- 8 Our review sought to answer the question: Has the Council effectively addressed the recommendations in our waste report which was issued in November 2022?

- 9 **Exhibit 3** sets out a summary of the Council's progress against each of our four recommendations issued in our 2022 report. We have deemed that the status of each of the recommendations is 'work in progress'.
- 10 Overall, we found that the Council is making reasonable progress with addressing the recommendations from our 2022 waste report, but work remains to address them fully.
- 11 The Council is implementing its recycling strategy and work is ongoing to develop its plans to improve its waste and recycling service, but recycling performance has not met Welsh Government targets running the risk of incurring penalties.

# Detailed report

## Summary of the Council's progress against each of the recommendations raised in our 2022 report

### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

**Recommendation 1 – The Council should implement a strategy to significantly improve service delivery and increase its recycling rate as a matter of urgency.**

**Status: work in progress**

**The Council is implementing its recycling strategy, but whilst the quality of recycling material has improved, performance still falls short of Welsh Government targets.**

#### **Findings from this follow up review:**

1. Cardiff Council declared a Climate Emergency in March 2019, and has since been working towards becoming a carbon neutral organisation and city by 2030, as stated in the Council's One Planet Cardiff vision. To support this vision, Cabinet approved the Council's Recycling Strategy 2022-25 Cleaner and Greener on 28 September 2022 (the strategy) and the Council is in the process of implementing this strategy.
2. The Council started its roll out of kerbside segregated recycling collection to residential properties, but it is behind schedule. The scheme is being rolled out with a target of 100% completion by the end of March 2025. The roll out was delayed due to the procurement and manufacture of vehicles to support the collection of segregated recycling. Industrial action between September 2023 and February 2024 also had an impact on the timing of the roll out.
3. The Council improved its recycling performance from 58.19% in 2021-22 to 61.57% in 2022-23. Its performance for 2023-24 was 60.1%, which represents a small dip in performance from the prior year, which is not unusual when there is a change in waste collection methods. The implementation of the new collection regime has, therefore, not yet had the intended impact on improving recycling rates, and the Council has still not met the 64% statutory waste recycling target, which was originally set by the Welsh Government for 2019-20.

### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

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4. The Welsh Government has set a 70% recycling target for 2024-25 so it is expected that all Local Authorities in Wales will achieve this within the year. At the start of 2024-25, based on unaudited performance data that has not been verified, the recycling performance in Cardiff is showing improvement, with 66.52% in quarter 1 and 65.7% in quarter 2, so the Council has some way to go before it will meet that new target, estimating that it will do so by the end of 2026-27, two years after the new target comes into force.
5. Whilst the Council's recycling performance has not met the statutory target, the quality of recycled waste collected has improved since it implemented kerbside segregated recycling collection. There has been a significant reduction in the contamination rate from 20% to 3%, which is positive and helps improve prospects for generating income through the sale of the recyclable materials. For example, the service has obtained additional income from the sale of glass which will be added to the base budget.
6. The Council's recycling performance continues to be one of the lowest in Wales, but aspects of its demographics present significant challenges. The city has a high student population (16.2%) and many buildings are high-rise or Houses of Multiple Occupation (30%), which presents challenges to the storing and collection of recycling. The Council is continuing to develop its understanding of these issues in partnership with WRAP<sup>1</sup> and to engage with those communities (see **Recommendations 3 and 5** below), but this is not translating into improved recycling performance at this stage.
7. Cardiff Council Trade Waste has implemented business recycling regulations for 3,050 businesses across Cardiff. This initiative supports the goal of improving business recycling in Cardiff and Wales. While there are improvements in business recycling performance, these lower levels of non-household recycling compared to household recycling continue to negatively impact Cardiff's overall recycling performance.
8. The Council is at risk of having to pay a financial penalty for not meeting Welsh Government recycling targets. Failure to implement the action plan within its strategy could result in the Council receiving a fiscal penalty of £1.8 million, for a recycling performance of 58.19% in 2021-22 compared to a target of 64%. The Council has been in contact with the Welsh Government to set out its progress and challenges in delivering its strategy. At the time of our review, the Council was waiting to hear if it would receive a penalty for non-achievement of the 2021-22 target. The Council could be fined

<sup>1</sup> WRAP (Waste and Resources Action Programme) is a British registered charity. It works with businesses, individuals and communities to achieve a circular economy, by helping them reduce waste, develop sustainable products and use resources in an efficient way.



### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

for each year it does not meet the statutory target. In recognition of this, recycling and waste feature on the Council's Corporate Risk Register as a Medium/Amber risk.

#### **Recommendation 2 – The Council should ensure it allocates the resources needed to implement its recycling strategy in its medium-term financial plan.**

##### **Status – work in progress**

**The Council has allocated resources to deliver aspects of its recycling strategy, but it is awaiting confirmation of a Welsh Government grant, and has not made decisions on some significant proposals which are intended to help strengthen the sustainability of the service.**

##### **Findings from this follow-up review:**

9. The Council has committed resources to delivering aspects of its recycling strategy. For example, it has invested circa £10 million in a new waste collection fleet, to support the roll out of kerbside segregated recycling to 'improve the quality of recycling material presented by residents'.
10. As an indication of the priority afforded to improving recycling, the Council protected the waste service from budget cuts in 2024-25. However, the Council is currently forecasting a medium-term budget gap of £148 million, and waste and recycling are being considered alongside other Council priorities, as the Council explores how it can bridge its funding gap.
11. Continued partnership working with WRAP has assisted the Council to more effectively model resource requirements to implement key elements of the strategy.
12. There is integrated working between service-based and corporate finance officers, to better understand what needs to be done to deliver the strategy, to inform a more accurate assessment of the resource requirement.

### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

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13. The Council forecasts capital and revenue costs for the service, and monitors variances monthly based on improved data capture, enabling more timely and accurate monitoring of tonnage, financial costs, and forward profiling.
  14. At the time of our fieldwork, the Council had not received confirmation of grant funding from the Welsh Government to help support delivery of its recycling strategy, for example, to fund the cost of providing containers and sacks.
  15. The Council's recycling strategy aims to reduce residual waste. The Council is exploring options to achieve this while ensuring a sustainable financial position. No policy decisions have been made yet.
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**Recommendation 3 The Council should ensure it understands the risks concerning the implementation of the recycling strategy and take appropriate action to mitigate those risks. This should include the development of an engagement and communication strategy with residents and effective governance and oversight arrangements with councillors and senior officers.**

**Status – work in progress**

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**The Council understands the risks associated with implementing its recycling strategy but there is scope to improve planned reporting arrangements for both members and the public.**

**The Council has developed an engagement and communication strategy to support the roll-out of its kerbside segregation of waste and is engaging with stakeholders to try to encourage more participation in recycling.**

#### **Findings from this follow-up report:**

16. Waste and recycling are included as a risk in the Council's Economic Development Directorate risk register. This is updated monthly. Senior officers also discuss related project risks with Cabinet members, as necessary.

### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

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17. Recycling and waste management have been escalated to the corporate risk register, which is reviewed by the Senior Management Team quarterly. The register was last considered by Cabinet in September 2024. Governance and Audit Committee also review the risk register twice a year.
18. We found members were provided with an overview of recycling performance, but given the level of recycling performance and risk of financial penalties, there could be more regular and in-depth focus on performance by Cabinet. The Council states in its Recycling Strategy that delivery of the strategy should be reviewed by Cabinet and the Environment Scrutiny Committee (ESC) on an annual basis, to monitor costs and progress towards waste and recycling targets. The ESC received its last update on recycling and waste in January 2024 and Cabinet July 2023. Since then, recycling performance has been reported to Cabinet at a very high level, as part of the Council's reporting of progress against its Well-being Objectives, and ESC members received a briefing on performance in private session on 14 November 2024. We could not, however, find any planned reporting of waste and recycling performance for the remainder of 2024-25, thereby limiting the opportunity for members and residents to challenge performance which is at risk of triggering financial penalties from the Welsh Government.
19. Our last review found that the Council's governance arrangements for delivering the strategy did not include a programme management board with elected member, senior officer, and WRAP representation, as has been the case with other councils WRAP has worked with. We found that the Council has since set up a waste and recycling programme board, which includes senior council officers, representatives from WRAP and the Welsh Government. The Programme Board determines whether Officer-based decisions should proceed for approval either via Officer, Cabinet or Council decision making channels via the delegations in the Constitution.
20. The recycling strategy includes references to the importance of keeping residents informed and engaged. Officers have since developed a specific Communications and Engagement Strategy with WRAP, for household recycling changes based on the results of consultation with residents. The service has also worked with WRAP to develop a communication package for residents including letters, booklets, pullouts, with corresponding web content to improve public awareness and understanding.
21. The Council appointed local engagement officers funded through the Shared Prosperity Fund, who delivered outreach sessions in the communities to support residents through the changes in collection methods.

### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

22. More recently, officers have consulted with Further and Higher Education authorities to discuss how they can encourage students to recycle, such as the initiative Love When You Leave Campaign for students. This focusses on the student move-out period, encouraging reuse and recycling of unwanted items, but this has not resulted in improving student participation in recycling.

**Recommendation 4 – The Council must continue to develop an integrated and longer-term approach to waste management. This should take into account:**

- **policy developments from the Welsh Government on waste and a circular economy;**
- **wider social, economic and environmental goals that support the Council's wider objectives; waste reduction and waste prevention; and**
- **the sustainable development principle, including involving its communities and strengthening integration with other plans and policies**

**Status: work in progress**

**The Council is developing an integrated and longer-term approach to waste and recycling, which is supported by its work with WRAP and the Welsh Government, but the wider impacts of its recycling strategy that support the Council's well-being objectives are less clearly defined.**

**Findings from this follow up review:**

23. The Council is considering national policy developments. It is working with the Welsh Government, WRAP and other partners, to align with broader Welsh Government recycling and waste management policies and initiatives. The Council has provided examples of how it is working towards longer-term solutions in line with, 'Towards Zero Waste – The Waste Strategy for Wales (2010)', and 'Beyond Recycling – A Strategy to make the Circular Economy in Wales a Reality (2021)'. Specific examples include activities to support a circular economy in Cardiff, developing a pilot for warehousing and distribution of items and materials, and development of a Materials Handling Facility.

### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

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24. Collaborative working with stakeholders such as WRAP, Further and Higher Education authorities, local businesses and Third Sector organisations are underway, to develop preventative approaches to reducing landfill and improving recycling and reuse. This includes promoting third-sector repair cafés and loaning items with Benthylg<sup>2</sup> and others.
25. There are further examples of the Council attempting to reduce and prevent waste. It is working in partnership with organisations such as Keep Wales Tidy<sup>3</sup> and initiatives like City to Sea<sup>4</sup>, to create opportunities for communities and residents to recycle locally through the expansion of Community Recycling Zones citywide, where residents can recycle items such as books, small electrical items, textiles and hard plastics. The Council has initiatives to reduce the use of plastics, such as, coffee-pod recycling and provision of water refill fountains. This further demonstrates its adoption and promotion of circular economy principles.
26. The sustainable development principle is explicit in the Council's Recycling Strategy and underpins its approach to delivery. However, the wider impacts of its recycling strategy, such as reducing CO<sup>2</sup> emissions, which is consistent with the aims in its 'One Planet Cardiff' Net Zero Carbon 2030 strategy, are less clearly defined and quantified.
27. The Council has developed draft Supplementary Planning Guidance for Waste and Recycling which it will progress as part of its Local Development Plan update in 2026. This will support the development of an integrated approach to recycling and waste management across Council services, especially around housing development. This is essential to ensure improved access to recycling facilities in housing developments, particularly in communal waste services, and to help address high levels of food and garden waste in residual waste which are ongoing.

<sup>2</sup> Benthylg – an organisation that supports a network of communities and helps them develop a Library of Things model promoting reuse.

<sup>3</sup> Keep Britain Tidy – Keep Britain <https://www.keepbritaintidy.org/Tidy> is a charity that works to improve the environment, eliminate litter and end waste.

<sup>4</sup> City to Sea – City to Sea runs campaigns to stop plastic pollution at source, by connecting our actions to our oceans.

### Exhibit 3: summary of the Council's progress against each of the recommendations raised in our 2022 report

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#### Recommendation 5

The Council should continue to explore how other organisations achieve better recycling outcomes and use this information to improve its own performance and shape its longer-term waste strategy.

#### Status – work in progress

The Council provided examples showing how it is exploring what other organisations are doing to achieve better recycling outcomes, but this work is not sufficiently developed to shape its long-term strategy for recycling.

#### Findings from this follow-up report.

28. While the Council is exploring other organisations' methods to improve its recycling performance, it has not identified exemplar organisations. Therefore, specific improvement outcomes and long-term strategy options have yet to emerge.
29. Some waste collaboration work has taken place, for example, with Claire Wales<sup>5</sup> and WRAP, to consider the performance and work of other councils. This has included councils such as Swansea and Newport, as well as councils in England.
30. An example of the collaborative work with WRAP includes a review of recycling infrastructure available at Houses of Multiple Occupation and flats at both Cardiff and Swansea Council. The Council is working collaboratively to understand and learn from different approaches to recycling with a view to applying this learning to secure service improvements.

<sup>5</sup> Four Welsh local authorities in the Collaborating Local Authorities in Resource Efficiency (CLAIRE) Wales group.





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