



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING  
ADVISORY COMMITTEE

Alice Roberts  
South East IEP

6 Sept 2009

Dear Ms Roberts,

**Consultation Response – WIN Benchmarking**

I am writing to present the LARAC response to the WIN Benchmarking Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of 90% of the 440 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC feels that the Benchmarking Tool could be a useful tool for authorities, and that it correctly identifies common issues as well as offering best practice solutions to such problems. We would like some more clarity on exactly to what purpose the benchmarking tool should be used, i.e. mainly as a tool for waste managers to assess their own service, or also for Members or external bodies to assess the waste department's performance. LARAC believes that for many issues, one size does not fit all and would therefore warn against being overly prescriptive; some criteria mentioned under 'excellent' will not suit all authorities, that may nevertheless be excellent. Overleaf are our detailed comments as requested in the consultation.

If you have any queries on this response or would like to discuss the matter further then please contact me on 01786 850326 or [khelwig@dsl.pipex.com](mailto:khelwig@dsl.pipex.com).

Yours faithfully,

Karin Helwig  
LARAC Policy Support Officer



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Generally, LARAC thinks common negative issues have been correctly identified under 'basic', and positive outcomes or identified best practice are being suggested under the headings 'excellent'. However, the suggested path for improvement (via 'fair' and 'good') from a negative issue to a positive outcome is not always logical.

The document could be more consistent in that sometimes under 'basic' a basic level of achievement is given, whereas at other times an unaddressed problem is listed.

In some sections, the requirements for the ratings of 'basic', 'fair', 'good' and 'excellent' are rather detailed, with several elements listed. Whether or not this is problematic depends on the future use of the benchmarking system. As a tool for self-evaluation, this amount of detail can simply act as a list of suggestions for improvements in the service. However, if it is likely to be used also for external assessments, the level of detail is likely to result in difficulties in assessing whether a Local Authority's performance is 'fair' or 'good' or otherwise, and can be over-prescriptive.

### **A1 KPIs and efficiencies**

Perhaps more attention could be given for the role of strategy and technology in relation to raising recycling / landfill diversion rates. Otherwise the section shows logical structure, with several elements relating to KPIs/efficiencies identified and benchmarks for improvement given.

### **A2 Data Management**

This section is less clear in structure. Perhaps it would help to review and identify the following separate elements:

- waste data collection (ranging from basic data on MSW only to comprehensive quantitative and qualitative datasets for all waste streams),
- use of data for strategy development (ranging from no real use of data to full use of waste as well as social economic data for evidence-based strategy development with review of effectiveness and identification of data gaps)
- data strategy / data format / comparability (ranging from use of in-house pro-forma to use of agreed protocols and datasharing)

### **A3 Partnership working**

In addition to the level of integration and the level of resources, the range of partnership working in itself could be rated from basic to excellent. Local Authorities can form partnerships with a wide



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range of organisations, such as community organisations, other non-governmental organisations, other local government departments (eg schools, housing, countryside services), others in the waste and recycling industry, and other government organisations. However, such an assessment should not be merely a "tick box" but should review a number of qualitative criteria such as quality of member involvement and empowerment, transparency in decision making and links between strategy and delivery at the community level.

LARAC finds the benchmarking tool over-prescriptive where it suggests that 'excellent partnership working' is always likely to involve a Joint Waste Authority or Committee; this may not be appropriate for all authorities.

The rating of the quality of the relationships is phrased in inappropriate terms for the benchmarking tool, as the criteria call for subjective judgements.

#### **A4 Strategy**

The first criterion under this heading seem to relate to strategic partnership working and it is suggested it is therefore covered under 'partnership' rather than under a strategy. Otherwise, the strategy section appears satisfactory.

#### **Collection**

##### **B1 Residual and recycling – part i**

The section on collection policy is rather prescriptive, in particular under 'Fair'. Judging participation only under 'good' and contamination only under 'good' and 'excellent' is inconsistent; if participation and contamination are to form a criterion, this can be judged over the full range from Basic to Excellent. Marking the Recycling rate from low to very high as proposed would need % bands. LARAC would suggest an element of progress is measured in addition to actual levels. LARAC finds the criteria under Garden Waste over-prescriptive on the type of services to be provided. Rather, it would be appropriate to include the level of Green Waste arisings and % diverted as a measure of success, although this in itself would need to be related to contextual variables, such as rural/urban split and % homes with gardens.

##### **B2 Residual and Recycling – part ii.**

LARAC finds the benchmarks for bulky waste over-prescriptive. Key issues for bulky waste are minimisation of waste arisings, and maximisation of reuse and recycling. These should therefore determine the benchmarks. Whether or not a charge is made or restrictions are placed on the amount per HH is secondary to these key issues.

To what extent bring sites form part of the recycling collection provision should be up to the local authority. Good management of the banks, if used, could be benchmarked. Where at all possible the tonnages collected through bring sites should be recorded. However, a local authority's waste



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management strategy should provide clear and justified links with the council's delivery of "bring" sites in order for the authority to be considered to be "good" or "excellent".

Material Income / MRF arrangements: LARAC would suggest that increasing income through both quality improvement and optimum use of markets should be aimed for, whether K/S or Commingled. Clearly, it should be possible to reach the 'Excellent' benchmark when operating a K/S. Collaborative arrangements may optimise income or minimise cost, but may not always be appropriate, and should therefore not be prerequisite to achieving the status of 'excellent'.

### **B3 Residual and Recycling – part iii**

LARAC suggests that indicators for optimal route balancing are in part an economic / VFM assessment, indicating efficiency through optimal balancing of routes and minimising spare capacity and need for hire vehicles, and in part to do with crew satisfaction. It is not necessary to stipulate when a reassessment is undertaken (as is suggested should be done after a change in recycling performance).

LARAC would also, rather than assuming excess capacity, rate the optimisation of capacity. Driver Training – speed of operation could be included as an indicator of successful driver training. Introduction of a new service – consultation and communication should not be confused. It is not always necessary to consult.

Salaries – Realignment of appropriate salaries should be done in accordance with the authority's general procedures on this. It should not be necessary to set new external benchmarking criteria on this.

Positive feedback / crew interest – LARAC does not think it is necessary to single out collection crews here. All staff should receive positive feedback where this is their due and all staff should take an interest in and care about the results of their way of working.

Absence, Overtime and Agency Cover – layout error. Also, the requirements under 'Good' seem to exceed those under 'Excellent'.

### **B5 Flats, HMOs and Estates**

Issues in this section need clearer identification. E.g. work with landlords and planning guidance for property development need to be two separate issues.

### **C1 Procurement**

Again, it cannot be assumed that a partnership is the most efficient way of working. This will depend on local circumstances. For 'Excellent', the support of a procurement professional should not be the only criterion.



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Some of the comments under procurement would fit better in a 'best practice' document than in a benchmarking exercise, e.g. the suggestion to 'borrow and adapt' documentation from other councils.

### **C1 Contract management**

It is not clear to LARAC why a different approach is used in this section. Although the approach has the advantage of clarity, which is sometimes lacking in other sections, it reads like a catalogue of common (?) errors and comes across very negative. Identification of best practice and suggestions of innovative contract management would offer more encouragement.

### **D1 Disposal**

The benchmarks in this section are quite detailed. See the remarks at the beginning of this response.

For diversion plans, 'clarity on capacity required or scale of solutions needed' is rated as 'fair'. Then under the next point, 'Facilities in the region are clearly listed with costs and benefits assessed and discussion with operators has established potential for use where appropriate' is rated as 'good', whereas 'design and build costs are clear...' is 'fair'. It seems difficult to separate the two, as it is unlikely discussions with operators or a calculation of design and build costs could take place before an assessment had been made of the scale of solutions needed.

### **F1 Investing in people**

No comment, generally happy with this section.

### **F2 Member support**

No comment, generally happy with this section.

### **F3 Health and Safety**

A link back from H&S procedures to the accident and incident occurrence could be included.

### **G1 Composition analysis**

This section could be incorporated into the Residual and Recycling sections. Is compositional analysis data used to assess the performance of recycling schemes (as % of waste component that the scheme diverts from disposal)?

### **G2 Enforcement / G3 Waste Prevention / H1 Trade Waste / H2 Streetscape:**



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LARAC has no specific comments on these sections, and generally agrees with the criteria. As with previous sections, at time they contain quite a lot of detail, which can be helpful in identifying best practice, as long as it is not used in a prescriptive way.