

POP's & Street Cleansing

- Our Experience

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City of Culture 2025



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METROPOLITAN DISTRICT COUNCIL

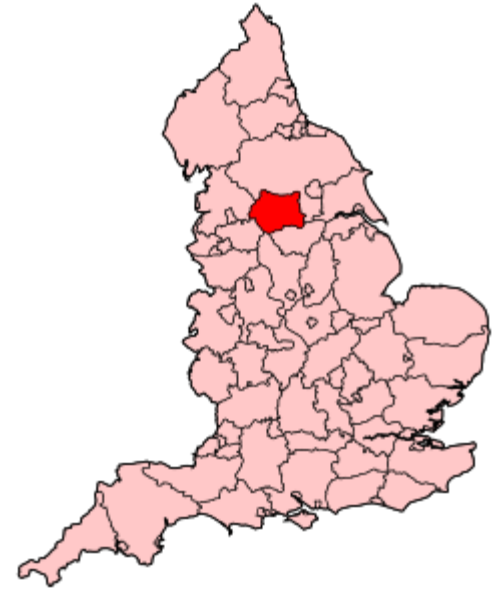
What are POP's?

- Persistent Organic Pollutants
- Flame retardant chemicals - upholstered items
- Long lived & harmful to both humans and animals
- Use is now banned
- Many UK manufacturers stopped in 2011
- Estimated 30% of items contain POP's



Context

- 547,000 people - 5th largest in England
- 210,000 households
- 2000 linear km's of highway
- 63% rural - 15+ distinctly separate villages & towns
- 5th most income-deprived authority in England
- 22.8% of population under 16 - 4th in England



Kerbside Waste Policies

- Waste Services all in-house
- Wheeled bins introduced in 1998 – ABC 2018
- Optional Paid Garden Waste - 240 bin every 4 weeks
- High % terrace housing stock – collection points



Other Waste Policies

- Paid Bulk Collections
 - Prices banded 1-5 items (£20) or 6-10 items (£35)
 - One RCV on an appointment system (50 per day)
 - Approved private contractor for WEEE
- 8 x HWRC's - no appointment system
- Residents permit system
- Van & Trailer permit system
- Unitary Authority



Street Cleansing

- In-house & merged with parks
- Devolved in to 5 MP Constituencies
 - 6 wards in each
 - 4-6 teams per Constituency
- Very limited centralised control
- One manager per Constituency also covering all parks staff

Fly Tipping

- 10,000 public reports + 8,000 crew reports
- 29.8 cases per 1000 people
- 37th highest rate in England
- One centralised RCV based in the south
- RCV covers the 3 urban Constituencies
- These areas generate 80% of public reported fly tipping





Fly Tipping RCV

Average: 38 jobs p/ day

Max: 50 jobs per day

Tipping once normally



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The Letter

- Initial EA letter received in Nov via Waste Services
- Confusion in interpretation of letter
- Online research – articles on POP's and history of legislation
- Back & forth emails between colleagues
- Follow-up clarification emails to EA

Initial Concerns

- Over 20 years of maximising efficiency of service
 - Accommodating growth in fly tipping with less money
- How much inefficiency will this re-introduce
 - Majority of fly tipping collected by RCV
 - Particularly useful for large items e.g. sofa's
 - Second vehicle to attend same site in “x” number incidents
 - More fuel consumed = higher carbon footprint + more cost
- Public perception – duplication / negative perception
 - *“...a van came and picked up some items but left some!”*



Example of Lack of Clarity

creating a better place
for people and wildlife



Dear Sir or Madam

Waste Upholstered Domestic Seating

Information to help you ensure you comply with the existing legal requirements for waste containing Persistent Organic Pollutants (POPs)

Throughout the letter there is only reference to “upholstered seating” and never seems to incorporate similarly upholstered items

APSE Guidance Note

Products not considered 'domestic seating' for the purposes of the guidance include:

- Items that are not upholstered (for example a wooden chair without a cushioned or textile back, seat or arms)
- As a Waste Collection and / or Disposal Authority, or the operator of a Household Deckchairs, mattresses, curtains, blinds, and beds
- Wastes from the manufacture of new domestic seating that are known not to contain POPs

Landfill operators will now be expected to include "appropriate checks" in their waste acceptance procedures to ensure waste does not include soft furnishings.

The term "*soft furnishings*" would cover more than just "*upholstered seating*"



Difference in Interpretation

If beds don't count, how does a headboard differ from an upholstered back to a wooden chair?



In scope for POP's?

Not in scope for
POP's?

Operational Clarification I

Q – If items are found co-mingled in a pile of fly tipping, does the whole pile need to be consigned as POP's?

A - If the mixed waste has not been compacted and there are no signs of damage/contamination from the soft furnishing, then this can be removed and isolated and the remaining mixed waste treated accordingly.



Operational Clarification II

Q - If the upholstered item is discovered at the road side by itself and we load it on to a transit, can we use that transit to bring in other fly tipped items?

A - POPs and non-POPs items can be transported in the same vehicle as long as there is segregation to make sure the wastes do not mix and prevent damage.



Operational Clarification III

Q - The word “segregation” is one that can mean a physical divide or just a spatial divide. Does there need to be a physical separator or can we just put general waste on the back of the transit and then place the sofa for example on the end of the transit as long as there is small space between them?

A - As long as the POPs waste is intact, there would be no need for a physical barrier for segregation in the collection vehicle.



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Getting Started

- Discussions with managers / H&S / Waste Services
- How do we make rules obvious to public and staff?
- Common-sense approach prevails
 - Same flat-bed as other waste if undamaged e.g. to one side
 - Only separate load if damaged
 - No POP's on RCV at all



Clear Tipping Arrangements

Please use this skip when disposing of the following items;

- Sofa's, Armchairs & Cushions
- Bed Headboards
- Cushioned Office Furnishings
- Cushioned & Upholstered Dining Chairs
- Futons & Sofa Beds
- Bean Bags




Thank You for your co-operation.



8 bays at HWRC's

2 at Transfer
Loading Stations

Procedure for Cleansing Staff

<div data-bbox="676 371 898 478"><p>City of BRADFORD METROPOLITAN DISTRICT COUNCIL</p><p>1</p><p>GROUP 1 BRADFORD MDC Neighbourhoods Management</p></div> <div data-bbox="318 482 821 664"><p>Occupation: Bradford MDC- Neighbourhoods Employee <i>(Specifically Street Cleansing, Parks & Ancillary Services)</i></p><p>Activity: POPs – Waste containing persistent organic pollutants.</p><p>Service Area/Division: Neighbourhood and Customer Services</p><p>Procedure Number: P57</p><p>Date Implemented: 20th December 2022</p><p>Reviewed: </p><p>Reviewed by: Stuart Russo / Daren Parr</p></div> <div data-bbox="318 685 888 1149"><p><u>DEALING WITH WASTE CONTAINING PERSISTENT ORGANIC POLLUTANTS (POPs)</u></p><p>Persistent Organic Pollutants (POPs) are a group of chemicals that do not breakdown and are hard to destroy. They are often found in products like upholstered furniture.</p><p>Why do POPs matter and what has changed?</p><p>These chemicals can get in to the wider environment contaminating water or food supplies, leading to health problems in humans and animals.</p><p>To prevent POPs from getting in to the environment the Environment Agency have made it a legal requirement for items containing POPs to be disposed of separately as of the 1st January 2023. Any items containing POPs will need to be deposited in a separate designated area to general waste.</p><p>Why can't a damaged upholstered item be transported with other waste types?</p><p>If a damaged item is mixed and transported with other waste materials, the whole load is classed as contaminated and will need to be completely disposed of in the POP's bay.</p><p>What must the driver do?</p><p>There is a dedicated signed bay at both Keighley TLS and Bradford TLS for these materials.</p><ol style="list-style-type: none">1) Upon arrival the driver must inform the weighbridge officer that they have POPs waste on board.2) The vehicle will be weighed in and the crew must carefully unload items in the special POPs bay. If the vehicle has other waste types on board, the driver must cross onto the weighbridge again and weigh in the general waste. If you are unsure seek advice from the weighbridge officer.3) Parks staff must not dispose of POP waste into skips at Parks Depots.</div> <div data-bbox="318 1192 888 1213"><p>Bradford MDC – POPs (Waste containing persistent organic pollutants)</p></div>	<div data-bbox="1342 371 1564 428"><p>City of BRADFORD METROPOLITAN DISTRICT COUNCIL</p></div> <div data-bbox="994 421 1294 442"><p>What items are classed as containing POPs?</p></div> <div data-bbox="994 449 1217 471"><p>The current list of affected items is:</p></div> <div data-bbox="1014 478 1284 564"><ul style="list-style-type: none">• Sofas, Armchairs & Cushions• Bed headboards• Cushioned & upholstered dining chairs• Futons and sofa beds• Bean Bags</div> <div data-bbox="994 564 1535 678"></div> <div data-bbox="994 685 1284 706"><p>Items that are not included in the POPs list are:</p></div> <div data-bbox="1014 714 1284 785"><ul style="list-style-type: none">• Mattresses• Pillows• Chairs with no cushions or no upholstery• Bed frames or divans</div> <div data-bbox="994 806 1439 828"><p>How does this affect Street Cleansing, Ancillary Services and Parks?</p></div> <div data-bbox="1014 835 1574 971"><ul style="list-style-type: none">• We can no longer use a compaction vehicle (Bin Wagon) to collect any upholstered items. All POP items must be collected using a transit, flat back or box wagon.• We cannot damage the item in any way when handling or transporting it to the waste disposal site.• <u>If the item is undamaged</u> we can transport it in the same way as a gas bottle or fridge (separately to the main pile of waste).• <u>If the item is damaged</u> it cannot be transported with any other waste types and the driver must make a separate trip to the waste disposal site with just POP items on board.</div> <div data-bbox="994 992 1168 1013"><p>Who is checking on this?</p></div> <div data-bbox="994 1021 1574 1149"><p>The Environment Agency will carry out site inspections of all disposal sites and will challenge non-compliance which can lead to fines or loss of a license to operate the waste disposal site.</p><p>Site managers will therefore challenge crews that are handling POPs waste correctly and will notify Street Cleansing and Parks managers of any breaches.</p><p>If staff are repeatedly breaching instructions, then it could lead to further action in line with the disciplinary procedure and this is why it's essential that if unsure staff need to contact managers for advice or guidance.</p></div> <div data-bbox="994 1178 1574 1199"><p>Bradford MDC – Handling Difficult Waste</p></div>
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Measuring the Impact of POP's

Where Found (enter one number only):

Key

1	Highway	6	Railways
2	Footpath/Bridleway	7	Private Residential
3	Back Street/Alley	8	Private Commercial
4	Council Land	9	Water Course
5	Agricultural	10	Other

Type of Waste (enter one number only):

Key

1	Commercial Bags	9	Construction
2	Other Commercial	10	Green Waste
3	Domestic Bags	11	Chemical
4	Other Domestic	12	Asbestos
5	Tyres	13	Clinical
6	Vehicle Parts	14	Animal Carcass
7	White Goods	15	Other
8	Other Electrical		

Amount of Waste (enter one number only):

Key

1	Single Black Bag	5	Transit Van Load
2	Single Item	6	Tipper Lorry Load
3	Car Boot Load	7	Multiple Loads
4	Small Van Load	8	

Disposal of Waste (enter one number only):

Key

1	Collected	4	Other Department
2	Environmental Health	5	Not Fly Tip
3	Asbestos Unit		

At least 1 or more upholstered items in the fly tip? Y/N

Extra trip required because of upholstered item? Y/N

Nothing Found:

Name:

LAGAN No: (Location Found)		Date:	
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Amended the "Fly Capture" form.
Now a requirement under the
ASB&P Act 2014

Two extra fields added:

- Instances POP's present
- Instances where an extra trip was required



Extra Trips

Overall the impact of extra trips initially looks quite low

Fly Tips Cleared	POP's Present	Extra Trip Required	% Extra Trips
2935	264	201	6.8%

If broken down it shows that nearly 1 in 5 fly tips reported by the public require an extra trip to the site by a transit

	% FT's with POPs Present
Central Fly Tipping Team with HGV	18.80%
Locality-based Transit Crews	2.20%
Total Overall	11.40%

Locality-based teams tend to be picking up a lot of cases where the waste is bag waste (excess domestic etc)

Tonnages

Tonnes by Waste Stream			
	Residual	POPS	% POP's
Bulk Collections	122	105	46.4%
HWRC's	3,380	214	6.0%
Street Cleansing	854	29	3.3%
Total	4,355	349	7.4%

*Only includes the waste stream that was residual previous to introduction of POP's regulations

** Data for 20th Jan 2023 to 2nd April 2023 (72 days)

- Est £400,000 increased disposal cost?
- Impact of changes in charges or policy: % ending up on the streets?
 - Bulk collection policies
 - Take-back schemes by retailers



Impacts (Fly Tipping)

- Est. £35,000 extra on disposal costs
- Almost 20% extra journeys for public reported FT's
 - Downtime est. £40,000 p/a (2 staff + transit)
 - Fuel est. 10,000 miles p/a (£5,000 p/a)
 - 9 tonnes of CO2
- £80,000 p/a = £0.40 p/a per property benchmarking?
- Training / procedures administration
- Double time on transfer loading stations



Current Status

- Increased journeys necessary - but expected
- All five areas reporting no staff issues
- Little negative public feedback - 1 call logged
- Transfer Loading Stations happy with disposal compliance
- Extra costs to be found – Waste Services budget

Poorly Implemented by EA

- Seeming lack of industry consultation on impact of policy
- Relatively short notice – rushing in changes
- Why now? Manufacturing change in 2011
 - 12 years of items going to landfill etc
 - Reducing ratio of items pre-manufacturing change
- Early changes / updates suggest not thought through
- Top-down approach with no thought about public and shop-floor understanding or practicalities and costs



Long Term

- Potential for increase in fly-tipped POPs items
 - future Bulky Waste Service changes
 - Industry take-back changes
- Will the need for separate collections ever be lifted assuming no items contain POP's in future?
- Why carry on extra journeys without valid need
 - Inefficiency impact on public purse
 - Carbon footprint (different stages on green fleet journey)
 - Double cost of disposal of any waste tipped as POPs



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