



Association of Directors of
Environment, Economy, Planning & Transport

ADEPT Waste Group – Q2

22 April 2026 – 10:00-12:30
Microsoft Teams Videoconference

MEETING NOTES

Item 1

Welcome and Introductions - Steve Palfrey

Steve Palfrey (Suffolk County Council), co-chair of the ADEPT Waste Group, opened the Q2 meeting and welcomed attendees.

Aimi Brookes introduced herself as attending on behalf of her manager, Peter Jeffries, from North Yorkshire Council.

Item 2 – Local Government Reorganisation (LGR): Waste Toolkit

Presenter: Andrew Gore, Head of Zero Waste, Local Partnerships

Andrew Gore delivered a presentation on the Local Partnerships LGR Waste Toolkit and the support available to authorities undergoing local government reorganisation.

Andrew explained that Local Partnerships is a joint venture funded by the LGA, HM Treasury and the Welsh Government, providing support to the public sector. The LGR Waste Toolkit has been developed to support authorities through reorganisation from a waste perspective and is available free of charge via the Local Partnerships website.

The toolkit provides a structured framework that can be used in full or selectively and is designed to support both strategic and operational activity. It covers the pre-vesting and post-vesting periods, including discovery and “as-is” assessment, data and asset readiness, governance and programme management, day-one service continuity (safe and legal services), post-vesting visions and business case development, mobilisation and continuous improvement. Andrew highlighted the particular complexity for waste services arising from LGR alongside national policy reforms, including EPR, DRS and Simpler Recycling. Andrew also noted that, in addition to the free toolkit, Local Partnerships can provide chargeable bespoke support, including workshops for members and officers, development of strategies and assistance with drafting business cases. He advised that a Highways LGR Toolkit is due to launch on 4 June.

During discussion, Steve Palfrey asked whether the toolkit addresses situations where existing waste disposal arrangements are disaggregated across multiple new unitary authorities. Andrew confirmed that the toolkit provides a high-level strategic framework to support this, including governance considerations, though recognising the political and practical complexities involved.

Wendy Barratt provided feedback on a Local Partnerships-facilitated workshop held with members, noting it had been very helpful and particularly valuable as independent input. She asked whether Local Partnerships is engaging with chief executives, given some corporate centres are developing generic LGR toolkits. Andrew advised he would check with colleagues and follow up.

David Dale suggested that there could be value in a “buddying” approach, linking authorities currently undergoing LGR with those that have already experienced disaggregation (for example Cumbria or Northamptonshire). Andrew supported the suggestion and noted that Local Partnerships has previously facilitated similar knowledge-sharing and would explore this further.

Daniel Ayrton raised concerns that the disaggregation of waste disposal functions is being under-recognised, particularly in relation to long-term waste contracts, assets and liabilities. He highlighted the risk of post-vesting disputes or litigation and queried whether there is a channel to escalate these risks to central government. Andrew acknowledged the issue and confirmed he would explore whether concerns could be raised through Local Partnerships’ links with the LGA and others. David Dale confirmed via the meeting chat that ADEPT would raise these concerns with Defra Directors.

Chloe Tringham offered to share lessons learned from Cumbria, having undertaken waste leadership roles both pre- and post-vesting. This offer was welcomed by the Chair. Andrew confirmed that presentation slides would be forwarded following the meeting.

Actions:

- Andrew Gore to send presentation slides to Julie Jones for circulation.
- Andrew Gore to check internally on chief executive engagement and possible escalation routes for LGR disaggregation risks and report back.
- ADEPT (via David Dale) to raise concerns on waste contract and disaggregation risks with Defra Directors.
- Chair/ADEPT to consider further work within the Waste Group on LGR disaggregation risks and knowledge-sharing between authorities.
- Chloe Tringham to be contacted regarding sharing Cumbria lessons learned at a future session.

Item 3 – Waste Crime Action Plan

Presenter: Alex Rennison, Defra (Joint Head of Waste Crime)

Alex Rennison provided a presentation on Defra’s recently published Waste Crime Action Plan, setting out the drivers for its development, its main components, and the anticipated next steps.

Alex explained that waste crime continues to present a significant environmental, social and economic challenge, with estimated costs to the economy of at least £1bn per year. The Action Plan was developed at pace following increased ministerial and public concern, particularly in response to high-profile illegal waste sites. While the plan represents a step change in approach, Alex noted that it will not, on its own, eradicate waste crime and that further system-level interventions may be required in the future.

The Action Plan is structured around three key themes: prevention, enforcement, and remediation. Preventative measures include strengthening existing regulatory reforms (such as carriers, brokers and dealers, exemptions reform and digital waste tracking), improved use of data, and earlier intervention by the Environment Agency (EA). Enforcement measures include enhanced intelligence and analytical capability within the EA, increased

use of technology, exploring expanded enforcement powers subject to legislation, information-sharing with other bodies, and new deterrents such as penalty points on driving licences for fly-tipping offences. Remediation actions focus on targeted government intervention to clear the most serious illegal waste sites, with published criteria used to identify sites for action.

Alex confirmed that Defra is providing £45m of additional funding to the Environment Agency over three years to support enhanced enforcement capability. He also outlined work to explore a landfill tax rebate for the clearance of large illegal waste sites and longer-term options to reduce the financial burden on the public sector, including the potential role of insurance.

During discussion, Kofi Adu-Gyamfi raised concerns that waste crime prosecutions frequently result in low penalties that fail to act as an effective deterrent, calling into question the value of pursuing cases. Alex agreed that sentencing outcomes are a major issue and confirmed that the Action Plan includes work with the Ministry of Justice and the Sentencing Council to review whether current sentencing practice appropriately reflects the seriousness of offences.

Jackie Ward asked how local authority intelligence would feed into the EA's new intelligence and analytical capability, noting that councils hold significant local knowledge. Alex responded that while EA staffing may not significantly increase at local level, the enhanced intelligence function should improve the agency's ability to receive, process and act on intelligence from local authorities. He suggested that further engagement with EA colleagues would be helpful to explain how this would work in practice.

Wendy Barratt queried whether the proposed landfill tax rebate would apply where illegally deposited waste is disposed of via energy-from-waste rather than landfill. Alex explained that the current focus is on large illegal waste sites, where landfill disposal is often unavoidable, though the principle could be explored further as the scheme is developed. Steve Burdis highlighted challenges relating to planning enforcement constraints and the need for better alignment between planning authorities and the EA. He also supported stronger action on vehicle seizure and raised concerns about the quality of fly-tipping data, noting that current reporting does not adequately distinguish between minor incidents and large-scale illegal sites.

Paul Jones asked whether sufficient action is being taken in relation to waste hauliers and operator licensing. Alex confirmed that links between the EA and the Office of the Traffic Commissioner are improving, with intelligence-sharing already contributing to enforcement decisions.

Nick Bethel (Environment Agency) advised that the Defra approach is supported by a separate EA 10-Point Waste Crime Action Plan, which provides further operational detail, and offered to support further discussion with EA colleagues.

Alex also provided a brief update on wider Defra work, noting that broader circular economy strategy proposals remain under consideration across government due to cost pressures and cross-departmental discussions.

Actions:

- Defra to continue engagement with the Ministry of Justice and the Sentencing Council on the effectiveness of sentencing for waste crime.
- Environment Agency (Nick Bethel) to share a link to the EA 10-Point Waste Crime Action Plan and facilitate future engagement on intelligence-sharing with local authorities.

- Defra to continue development of the proposed landfill tax rebate scheme for clearance of large illegal waste sites.
- ADEPT Waste Group to consider future discussion on waste crime data quality, regulatory alignment and enforcement outcomes.

Item 4 – Packaging Extended Producer Responsibility (pEPR) Update

Presenter: Jeremy Blake, Chief Executive, PackUK

Jeremy Blake presented an update on the implementation of Packaging Extended Producer Responsibility (pEPR) and the role of PackUK as scheme administrator on behalf of the four UK nations.

Jeremy explained that Pack UK has been appointed by the Secretary of State for Environment to administer the scheme, operating within Defra due to the scale of funds involved, while acting on behalf of all four nations. The scheme is expected to recover in excess of £1.4 billion per year from approximately 4,300 producers, with payments made to around 388 local authorities. Pack UK's operating costs are met from producer fees, making the scheme cost-neutral to government.

Jeremy outlined that pEPR funding is not formally ring-fenced but must be demonstrably used to support the collection, treatment and disposal of household packaging waste. Eligible costs include kerbside and bring-site collections, household recycling centres, sorting and treatment, administration and communications. Any funding not used for eligible purposes is required to be returned to producers.

Local authority payments are calculated on the basis of assessed "efficient and effective" costs, rather than actual expenditure, using the Local Authority Packaging Cost Allocation (LAPCAP) model. Notices of assessment are issued in the autumn, with grant determination notices providing certainty of payment thereafter. Jeremy advised that refinements to the methodology are planned over the next few years to improve accuracy and stability. Jeremy also introduced the Recyclability Assessment Methodology (RAM), under which packaging is graded as green, amber or red according to its compatibility with local authority recycling systems. From the next scheme year, red-rated packaging will attract higher producer charges, increasing annually, to incentivise improved packaging design. Early analysis suggests that around 20% of packaging currently reported may be incompatible with existing local authority recycling systems.

Examples were provided of how pEPR funding is already being used, including investment in twin-stream collections and materials recovery facility upgrades, changes to collection systems to improve material quality, and enhanced communications and behaviour-change activity.

Jeremy outlined longer-term plans for the scheme, including the gradual delegation of certain functions to an industry-led Producer Responsibility Organisation (UK Packaging PRO). He confirmed that Pack UK will retain sovereign functions, including fee setting and collection, payments to local authorities, and assurance of outcomes. Ongoing work includes efficiency and effectiveness pilots, further consultations with local authorities, and continued development of payment methodologies.

During discussion, Wendy Barratt asked how efficiency and effectiveness would be measured and when this information would be shared with authorities. Jeremy responded that these concepts are complex and sometimes conflicting, with pilot work currently under way involving several consultancies. Further development is expected before the improvement process becomes fully operational in future years.

Daniel Ayrton raised concerns about the uncertainty for local authorities in committing to long-term infrastructure investment, particularly in light of other reforms affecting waste composition. He asked whether the Producer Responsibility Organisation might have a role in infrastructure development. Jeremy acknowledged the uncertainty, particularly in relation to flexible packaging, and advised that both producers and local authorities face similar challenges. He noted that significant investment will be required and that current thinking suggests producer-led investment is more likely to focus on reprocessing capability, with the interaction between systems still being worked through.

Jeremy emphasised that a number of issues remain unresolved and are subject to ongoing development alongside other reforms, including Simpler Recycling, the Emissions Trading Scheme and Deposit Return Schemes.

Actions:

- Pack UK to continue development of the Recyclability Assessment Methodology and underlying payment methodologies.
- Pack UK to continue efficiency and effectiveness pilot work and engagement with local authorities, with further consultations planned.
- Local authorities encouraged to share examples of how pEPR funding is being used to improve service performance and recycling outcomes.

Item 5 – Stakeholder Updates

The Chair invited updates from stakeholders present.

Nick Bethel advised that the Environment Agency has a supporting 10-Point Waste Crime Action Plan, which underpins the Defra Waste Crime Action Plan discussed earlier.

Nick noted some uncertainty as to whether a formal written EA update had been issued to the group.

- Wendy Barratt confirmed she had not received a formal written update.
- It was agreed that, if an update exists, it should be shared so it can be circulated with the meeting notes.

<https://engageenvironmentagency.uk.engagementhq.com/waste-crime-stand-with-us-to-end-waste-crime>

<https://engageenvironmentagency.uk.engagementhq.com/hub-page/environment-agency-wastehub>

Item 6 – ADEPT Waste Group Hot Topics

The Chair invited members to raise any hot topics or issues requiring discussion.

Clinical waste and sharps (including weight-loss injections)

Steve Burdis raised concerns regarding the increasing volume of self-administered sharps arising from household treatments, including weight-loss injections. Oxfordshire County Council has been advised by the NHS that councils are responsible for collecting patient self-administered sharps, a position the authority disputes. Members discussed the distinction between NHS-issued treatments and privately obtained injections and highlighted the risk of sharps entering residual or recycling waste streams, particularly where responsibility is unclear. It was agreed that this issue is likely to affect other authorities and should be explored further at a group level.

Deposit Return Scheme (DRS)

Barbara Jones asked whether there is any clearer guidance on how local authorities will be expected to redeem deposits under the Deposit Return Scheme. The Chair confirmed there is no further clarity at present. Engagement with Defra and Exchange for Change is ongoing, and it was noted that further information may emerge following an upcoming DRS conference.

ADEPT Spring Conference

David Dale reminded members that the **ADEPT Spring Conference and Annual Awards Dinner** will take place on **13 May**, with registration closing shortly.

Last call for the ADEPT Spring Conference 13th May

<https://www.adeptnet.org.uk/events/adept-spring-conference-annual-awards-dinner>

Actions:

- Julie Jones to circulate the a question from Steve Burdis regarding household clinical waste and sharps to the wider ADEPT Waste Group.
- ALL to respond directly to Steve Burdis providing feedback on what approach they are taking in their own authorities.