

# Simpler Recycling

Simpler Recycling is a new UK government initiative aimed at standardizing recycling across England. It requires all waste collectors and councils to collect the same core materials: general waste, dry mixed recycling (paper, cardboard, plastic, and metal), food waste, and glass.

## Key aspects of Simpler Recycling:

- **Uniform Materials:** All households and businesses will recycle the same set of materials, ending the "postcode lottery" of recycling rules.
- **Mandatory Food Waste Collection:** Weekly food waste collections will be required for all households and businesses (with over 10 employees).
- **Separate Bins:** Businesses with over 10 employees must have separate bins\* for general waste, dry mixed recycling, food waste, and glass by March 31, 2025. Councils must offer these collections to households by March 2026.
- **Goals:** The initiative aims to improve recycling rates, reduce landfill waste, support a circular economy, and ensure consistent recycling practices nationwide.

In essence, Simpler Recycling makes it easier for everyone to recycle correctly by ensuring the same materials are collected everywhere, contributing to a more environmentally friendly and efficient waste management system.

There are 2 routes to compliance:

1. The waste producer segregates the waste at the point of production; this lends itself to larger quantities of materials and the responsibility for compliance is on the waste producer.
2. After the application of TEEP (Technically, Economically, Environmentally Practical.), some materials can be processed via an MRF. This method, and in ISM's case, lends itself to lower quantities of waste and more infrequent collections.

After consultation with UROC and DEFRA, ISM is still offering mixed collections for general waste and Dry Mixed Recyclables (DMR). The waste we collect is processed in a Material Recycling Facility (MRF) where a high percentage of recyclables are recovered. As of April 2025, the recycling / recovery / landfill avoidance rate for all waste brought into the MRF in 2025, was at 79%, all of which was 100% compliant for reprocessing. For smaller waste producers, this is still the most economical method because separate collections add unnecessary costs from extra containers, additional truck visits and fuel use. In other words, more collections for the same amount of waste which would be separated, not what we would call the ideal outcome for our respective companies net zero ambitions and carbon footprints. The mixed collection option also reduces bin blight.

(DEFRA-<https://www.gov.uk/government/consultations/exemptions-and-statutory-guidance-for-simpler-recycling-in-england/outcome/government-response>) .

In order to adopt option 2, ISM has completed the appraisal assessment below which sets out the approach to TEEP.

# Simpler Recycling Assessment

## Collecting Paper and Card with Plastic, Metal and Glass

Waste collection authorities and other waste collectors can use this template to create a written assessment to collect paper and card with other dry recyclable waste (plastic, metal and glass). You do not have to use this template and can choose to use a different format. You should retain a record of your written assessment and any supporting evidence.

You should read the [guidance on collecting paper and card with other dry recyclable waste](#) before you fill in this template.

### Information about your organisation

**Name of waste collector or waste collection authority**

ISM Waste & Recycling Services

**Waste carrier number**

CBDU96892

### Information about the assessment

**How many written assessments have you (the waste collector or waste collection authority) completed?**

1

**What geographical area, collection route or type of premises does this written assessment cover?**

Commercial and industrial businesses in Lancashire and Greater Manchester

**Which dry recyclable waste will you collect with paper and card?**

Plastic, Metal and Glass



## Exceptions you are relying on

Which exception, or exceptions, are you relying on (technical, economic or environmental)?

Technical, economic and environmental.

### 1. Collecting separately is not 'technically practicable'

If you are relying on this exception, add the technical reasons why

1. ISM operates a Materials Recycling Facility (MRF). More working and storage space would be required to process individually collected waste streams.
2. Many of ISM's customers are unable to accommodate additional containers & bins for recycling and waste disposal due to space constraints.
3. ISM services businesses on industrial estates where customers rent / lease units for their business activities; the quantity, size and appearance of waste containers is often restricted by the terms of the lease which the landlord controls.
4. Acquiring many more containers in the short term is not possible as suppliers have indicated there are long lead times on large orders.
5. Separate collections sometimes contain unwanted contamination and this can be a real problem; our MRF has the ability to segregate and up-cycle many waste streams so they are compliant again when otherwise they could be rejected by re-processors.

### What type of data have you used?

Add all that apply.

For example:

- ***analysis completed by your organisation***
- analysis completed by a consultant
- WRAP (Waste and Resource Action Programme) data
- photographs
- floor plans
- other documentation (describe)

Data used includes analysis by ISM staff with a floorplan of the MRF.

## 2. Collecting separately is not 'economically practicable'

If you are relying on this exception, add the economic reasons why.

1. Recyclable material is collected separately in many cases where large quantities are generated but sometimes it is often not economically practical for smaller quantities for ISM or indeed for our customers.
2. There would be a significant investment required for additional trucks and containers, and significant operating / maintenance costs including fuel and driver's wages.
3. These increased costs could not be passed on to the waste producers and customers, many of which are themselves seeking to reduce their own costs. Our sales staff can complete a waste audit as part of the quotation process with new customers who mainly select the most economical service offered. Some customers do choose to have a separate container for all their dry mixed recyclables and whilst it is not collected separately, it is identified and sorted in the MRF. ISM can therefore offer a cost-effective price for this service.
4. The additional fuel used to deliver additional bins to us and then again to our customers should also be considered along with the ongoing transport fuel usage to separately collect and empty them all.
5. We see things rather differently and such we have been offering simpler recycling options to our customers since the early 1990s hence we can facilitate any mix & match combination of recycling choices to our customers.

### What type of data have you used?

Add all that apply.

For example:

- ***analysis completed by your organisation***
- analysis completed by a consultant
- WRAP data
- other documentation (describe)

Data used includes data from the recently implemented, separately collected, food waste round, and feedback from customers through the Sales team.



### 3. Collecting separately has 'no significant environmental benefit'

If you are relying on this exception, add the environmental reasons why.

1. All smaller containers with dry mixed recyclables that are collected with general waste, are sorted in the MRF. If, for example, we collected cardboard separately and did not pre-sort before baling, then the loads could be rejected at the processors for contamination.
2. Separate collections require addition trips to the same customer sites, therefore increasing vehicle fuel use and emissions unnecessarily.
3. Our long-term strategy has always been to attain increased landfill diversion by transforming waste into a resource which is why any non-recoverable waste from our MRF is then used to power waste to energy plants which produce green energy in the form of combined heat & power.
4. Additional plastic bins would use more valuable oil resources and energy to make them, similar considerations apply for metal bins. There would be additional fuel used to deliver them to us and then again to our customers.
5. Segregation at source often means that the same amount of waste and materials are now being moved but with more collections. One must consider the extra fuel usage being burnt to separately collect and empty all these additional bins. This method could result in negative affects with potentially damaging environmental outcomes. It's not what we would call the ideal outcome for ourselves and our customers respective net zero ambitions and carbon footprints.

#### What type of data have you used?

Add all that apply.

For example:

- ***analysis completed by your organisation***
- analysis completed by a consultant
- WRAP data
- other documentation (describe)

## **Additional Information**

All existing customers have been made aware of the Simpler Recycling legislation. While many customers have taken the option to have separate containers for food waste, very few have asked for separate containers for recyclables where the quantities are low.

One of the main objectives of Simpler Recycling is to increase the recycling rate of municipal waste to reach a target of 65% in 2035 from the current level of 45%. In 2024 ISM recycled 71% of all waste delivered to the MRF and are continually seeking to improve this (currently 79%).

[Simpler Recycling in England: policy update - GOV.UK](#)

## Authorisation

By typing your name, you confirm that the information you have given is correct.

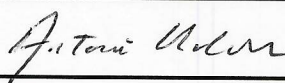
**Name**

Antonio Holden

**Job title**

Technical Director

**Signature**



**Date**

09/05/2025

**Date of next review**

09/05/2026