

Y R E G L W Y S
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T H E C H U R C H
I N W A L E S

Corff Cynrychiolwyr Yr Eglwys yng Nghymru
The Representative Body of The Church in Wales

Separating waste for recycling and tightening food waste regulations from 6 April 2024

Changes to recycling law

This note highlights your church's legal requirements in relation to the recycling of waste.¹

As a church, you may already be recycling as much waste as possible, as well as trying to be creative in reusing items safely during church activities, such as for play group activities.

From 6 April 2024, non-domestic recycling law is changing in Wales:

<https://business.senedd.wales/mglIssueHistoryHome.aspx?lId=42201>

All churches and church halls – as well as other non-domestic premises – will be required to sort waste for recycling more thoroughly to enable greater recycling rates and avoid the issue of potential cross-contamination.

¹ Part of this document is based on an advice note from Cytûn, Churches Together in Wales, which we reproduce with thanks.

How the changes will affect your church

From 6 April 2024, recycling will need to be separated into six different recycling containers by the owner/manager of premises, or by the operator of an activity, being held on the premises.

The six separate containers are:

1. Glass
2. Plastic, metal and cartons and other similar packaging (note: the supply of many single-use plastic items was banned on 30 October 2023)
3. Paper and card
4. Food waste (see further below)
5. Unsold* small electrical equipment
6. Unsold* textiles

* “Unsold” is defined as an unused consumer product. Initially, Categories 5 and 6 above are unlikely to apply to churches (or charity shops) which sell second-hand goods. However, Welsh Government intends to apply the recycling requirement to all textiles within three years, and all small electrical equipment within two years, so your church may wish to prepare for this change now.

***Please note:* It will be illegal to send waste in any of the above categories to incineration or landfill, and it will be illegal to send wood waste to landfill (although it can still be incinerated).**

The full definitions of each of the six categories, as contained in the regulations, are included as an appendix below. Further guidance is available on the Welsh Government website: <https://www.gov.wales/changes-workplace-recycling-guidance-workplaces#127756>.

Placing the incorrect waste in the incorrect container could lead to a fixed penalty notice (fine)

Local authorities could issue such fines, although Welsh Government says that the intention is to remind and educate first before applying penalties. The managers and trustees of multi-use premises – such as many church buildings – should therefore ensure that all users are aware of the new regulations.

Hazardous waste (such as batteries, solvents, pesticides, and so on) will – as now – need to be disposed of safely and separately from the recycling containers.

Definitions of household and commercial waste

Most places of worship, “premises used wholly or mainly for public meetings” (such as church halls and community centres) and charity shops are eligible for free household waste collection under the Controlled Waste (England and Wales) Regulations 2012.

For churches, the only exceptions are likely to be church cafes or shops which operate on a commercial basis, and residential centres, which need to arrange commercial waste collection. These 2012 Regulations are not changing and remain in force. However, even those premises eligible for free household waste collection will need to separate their waste into six containers as described above. It will be for the local authority to determine how these are collected – whether free of charge by its commercial waste collection service, or (as now in most cases) by its household waste collection, and how to deal with the differences in separation requirements between domestic premises (homes) and these new regulations.

If local authorities attempt to move your church to a charged waste collection service, you should refer the local authority to the 2012 regulations.

Food waste

The legal requirement to separate and recycle food waste will apply to premises that produce 5kg or more of food waste per week (if you produce less, it will be legal to put food waste in the general, non-recyclable, waste stream). However, it is good practice to separate and recycle all food waste, even small amounts, and this can be collected from churches free of charge as household waste. We would therefore encourage churches to do so.

Food waste down sink or into public drain ban

In addition, **there will be a ban on disposing any amount of food waste down the sink or into a public drain or sewer.** This applies not only to pouring food directly into the sink or drain but means it will no longer be permitted to use equipment such as macerators, enzyme digesters or de-waterers. Churches should ensure that users of their premises are aware of this. You will not have to uninstall any such equipment you have, but it is probably a good idea to uninstall or disconnect it, in order that it is not used by accident. Discharge of food waste into the public drains or sewers will be an offence and if this does happen, fixed penalty notices may be issued to the premises or operator concerned.

Appendix

Definitions of the waste types (in all cases hazardous waste is excluded and must be disposed of separately)

1. Glass

- Glass bottles used as packaging
- Glass jars used as packaging

2. Cartons and similar, metal and plastic

a) Cartons and similar Fibre-based composite packaging, being packaging material, which is made of paperboard or paper fibres, laminated with low density polythene or polypropylene plastic, and which may also have layers of other materials, to form a single unit that cannot be separated by hand, limited to:

- Cartons
- Paper drinks cups with a low-density polythene or polypropylene plastic layer
- Rigid paper containers

b) Metal:

- Aluminium foil
- Aluminium food trays
- Aluminium tubes
- Steel and aluminium aerosols
- Steel and aluminium jar and bottle lids and caps
- Steel and aluminium tins and cans

c) Plastic

- Amorphous polyethylene terephthalate and crystallised polyethylene terephthalate plastic packaging comprising pots, tubs, trays, rigid and semi-rigid lids and clear cups except where the plastic contains carbon black pigment so that it is not near infrared detectable
- Amorphous polyethylene terephthalate plastic bottles except where the plastic contains carbon black pigment so that it is not near infrared detectable
- High density polyethylene and low-density polyethylene packaging comprising pots, tubs, trays and rigid and semi-rigid lids except where the plastic contains carbon black pigment so that it is not near infrared detectable

- High density polyethylene and low-density polyethylene plastic bottles, pumps and triggers except where the plastic contains carbon black pigment so that it is not near infrared detectable
- Polypropylene and expanded polypropylene plastic packaging comprising pots, tubs, trays, rigid and semirigid lids and clear cups except where the plastic contains carbon black pigment so that it is not near infrared detectable
- Polyethylene and polypropylene plastic packaging tubes **except:** where they are less than 50x50mm, where they have contained products used in construction works, where they have a metal layer, or where they are multi-monomer plastic
- Polypropylene plastic bottles, pumps and triggers except where the plastic contains carbon black pigment so that it is not near infrared detectable

3. Paper and card

All paper and card, **except:**

Fibre-based composite packaging, being packaging material, which is made of paperboard or paper fibres, laminated with plastic, and which may also have layers of other materials, to form a single unit that cannot be separated by hand

Hardback books

Padded polyethylene lined envelopes

Paper and card containing glitter or foil

Paper and card contaminated with food, paint, oil or grease

Paper and card that has been laminated

Paper towels, tissues, wet wipes, kitchen roll

Scratch cards

Shredded paper

Stickers and sticky notes

Till receipts

Wallpaper

Wax, silicone, greaseproof papers

4. Food waste

All food waste (with some very limited exceptions)

5. Unsold small waste electrical and electronic equipment

All unsold small waste electrical and electronic equipment (as defined above)

6. Unsold textiles

- Clothing
- Non-clothing textiles including carpets and carpet tiles, leisure textiles (such as tents and tarpaulins), mattresses, rugs, soft furnishings (such as curtains, bedsheets, blankets, duvets, pillows, towels), underlay
- Packaging made from textiles