

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

Removal of recycling bags for kerbside collections

SECTION 1 – INTRODUCTION

This document provides an assessment of equalities impacts in relation to the proposal to remove recycling bags and instead provide additional recycling boxes for kerbside recycling collections. This was originally considered in the development of the Waste Strategy 2015-20.

Background

Waste and recycling is an important service used by every household in South Gloucestershire. Our updated [Waste Strategy](#) sets out our plans for the service from 2015 to 2020 and beyond to make sure that we reach our recycling targets and provide a service that can cater for our growing population.

Weekly recycling collections were introduced in June 2017 for all materials (with the exception of garden waste which is a subscription only service with fortnightly collections). In the period June 2017 – August 2018 we collected 4,419 extra tonnes of recycling from the kerbside (an increase of 14% on the previous year).

In June 2017 we also introduced the following changes to the recycling service:

- **Green boxes** can be used to sort recycling instead of a mixture of bags and a box. Residents may continue to use the white bag and green bag with the green box to sort recycling if they wish.
- **Cans, aerosols and foil are now mixed with plastic bottles, tubs and trays** in a green box or the white bag. Residents still need to sort other items so they can be separated into different compartments on the vehicles.
- **Cartons (Tetra Paks) are now mixed with cardboard** in a green box or the green bag. Residents still need to sort other items so they can be separated into different compartments on the vehicles.
- **Large cardboard boxes** need to be cut or folded down so they are no larger than the green box, so they can fit in the compartments of our new vehicles.
- **Motor oil and car batteries** are no longer collected from the kerbside and should be taken to a [Sort It recycling centre](#).

An assisted collection service is available for households where no resident is able to take bins or recycling containers to the kerbside, this service can be particularly helpful for disabled and elderly residents. Crews will collect bins and boxes from an agreed collection point (excluding inside the property) and return them once they have been emptied. More information can be found [here](#).

The continuing use of recycling bags was considered in the development of the Waste Strategy and feedback on a proposal to remove them was considered in the [Equality Impact Assessment and Analysis \(EQIAA\)](#) completed at that time (this was when recycling was collected fortnightly). The EqIAA identified two main concerns in respect of this:

- Younger people and people from 'White – Other' backgrounds were most in favour of the switch to additional green boxes (although younger age groups were most likely to find all the containers difficult to store / unsightly).
- Older people and disabled people were least likely to wish to see a switch to additional green boxes – feedback which was also borne out during consultation with the South Gloucestershire Disability Action Group.

As a result of the analysis use of the bags continued.

However, we continue to experience issues with:

- Bags deteriorating or blowing away means they normally need to be replaced and have a 12-18 month lifespan.
- From an environmental perspective, the bags are out of line with the need to reduce the use of plastics. The bags are manufactured overseas. They are made from non-recyclable plastic and deteriorate over a period of 12-18 months, releasing multiple fragments of plastic into the environment.
- The bags are manufactured overseas and transported via container ship contributing to climate change.
- Residents have told us there is confusion over how to sort recycling for collection. Removing the use of bags would enable us to simplify our messages so that residents are confident in using the service. This would enable crews to empty containers as efficiently as possible and reduce contamination.

Since the previous consultation:

- We introduced weekly recycling in June 2017, reducing the amount of recyclable materials residents need to store between collections.
- Residents have had a years' experience of the new weekly recycling service and a better understanding of the amount of materials they will need to store and present at the kerbside.
- We have introduced new vehicles to collect recycling. The use of boxes makes it easier and safer for crews to sort recycling as boxes can be hooked to the side of the vehicle.
- We have completed a review of our assisted collections (crews will collect waste bins and recycling containers from an agreed collection point for households where no resident is able to take bins or recycling containers to the kerbside).

We would like to reconsider the removal of white and green bags and ask residents to use green boxes for all their recycling materials. No changes are proposed to how materials need to be separated. It is noted that residents may continue to use their existing recycling bags until they need replacing, at which point, implementation of the proposal would mean that they would need to switch to using boxes.

SECTION 2 – RESEARCH AND CONSULTATION

Research

To inform the development of the Waste Strategy 2015–20 the waste team undertook comprehensive research and a summary of the evidence can be found at the following link: http://www.southglos.gov.uk/documents/wastestrategyevidence_742.pdf

Specifically in relation to the proposal to remove recycling bags, research included:

- Resident focus groups looking at service and container options.
- A resident trial of different types of recycling containers.

From the research we know:

- Residents found the existing service difficult to understand and wanted a simplified service. This was also supported by the StreetCare Survey of 2017.
- Residents were frustrated at the number of recycling containers, especially the bags, which can easily be damaged and can blow away in bad weather.

A public consultation in regard to the draft Waste Strategy took place in 2016. One of the questions asked was '*How strongly do you agree with the proposal to stop using the plastic, cardboard and paper bags and instead provide additional green boxes*'. This consultation identified that:

- older people and disabled people were least likely to wish to see a switch to additional green boxes. Comments made highlighted the difficulty older residents or those with reduced or limited mobility would have in carrying the boxes.
- younger people and people from 'White – Other' backgrounds were most in favour of the switch to additional green boxes (although younger age groups were most likely to find all the containers difficult to store/unsightly).

As a result of the equalities analysis completed at that time it was decided to offer residents the choice to either continue using the white plastic and green cardboard bags or to just use boxes.

The new weekly recycling service, with residents able to choose the types of containers they use, was implemented in June 2017.

Based on ongoing customer feedback we know residents are confused regarding how to sort and present recycling for collection. Council communications to explain this are complicated by the alternative methods of using different containers.

Consultation

An online survey in relation to the proposal was available for residents on the council's consultation webpage. Comments were also invited via letter, email, social media and telephone. Consultation information was sent to Town and Parish Councils, South Gloucestershire councillors and local voluntary and community organisations. Notifications were also sent to a range of other stakeholders and interested parties. All libraries and One-Stop Shops were also notified of the consultation details and asked to cascade the information to any interested parties. A member of the Waste Management Team also attended the South Gloucestershire Disability Action Group meeting to gather feedback from group members. The consultation was open to responses from 2nd November 2018 to 25th January 2019. There was a total of 2,304 surveys completed. 1,758 of these were online and 546 were paper surveys. 40 emails were received and 5 letters.

The following information provides an analysis of the feedback received.

Please note:-

- Table 1 (below) provides data relating to the responses provided by diverse 'Protected Characteristic' groups.
 - Data highlighted in red denotes a figure that is 10% or more lower than the overall results received.
 - Data highlighted in green denotes a figure that is 10% or more higher than the overall results received.
 - Where the base number of respondents is given in red text, this denotes that the overall sample is small and may not be representative of the wider population of South Gloucestershire for this Protected Characteristic group.
 - Figures may not sum because of rounding.

Table 1 – Table to show consultation responses as disaggregated according to ‘Protected Characteristic’ group.

Respondents:	Total	Sex		Broad Age Group			More detailed Age Group					Disability							Disability and Age				Ethnicity				
		Female	Male	Under 45	45 - 64	65+	19 - 24	25 - 44	45 - 64	65 - 74	Over 75	Disabled	Not disabled	Physical impairment	Sensory impairment	Mental health condition	Learning disability/difficulty	Long standing illness or health condition	Yes - Other	Under 65 disabled	Under 65 not disabled	65+ disabled	65+ not disabled	BAME	White Other	White British	
Base:	2278	1480	663	671	730	743	16	655	730	340	403	396	1563	316	56	78	27	198	112	124	1174	252	324	43	70	1946	
Do you currently use boxes for your recycling?																											
Yes	76%	74%	82%	79%	78%	72%	75%	79%	78%	77%	68%	72%	79%	67%	66%	81%	89%	70%	67%	76%	79%	71%	79%	74%	80%	76%	
No	22%	24%	17%	20%	20%	24%	25%	20%	20%	20%	28%	25%	19%	30%	29%	18%	11%	28%	30%	23%	19%	26%	18%	23%	17%	21%	
Do you know how to obtain additional boxes, if needed?																											
Yes, definitely	32%	33%	32%	33%	36%	28%	38%	33%	36%	32%	24%	29%	34%	28%	25%	37%	44%	24%	25%	39%	34%	25%	33%	28%	37%	32%	
Yes, probably	19%	18%	20%	23%	19%	16%	13%	23%	19%	16%	15%	16%	20%	13%	9%	18%	19%	17%	21%	15%	21%	17%	16%	19%	14%	19%	
Maybe / not sure	9%	9%	11%	9%	9%	10%	13%	9%	9%	11%	9%	10%	9%	8%	13%	8%	7%	10%	5%	9%	9%	10%	10%	14%	10%	9%	
No, probably not	9%	8%	11%	8%	8%	10%	13%	8%	8%	11%	9%	9%	9%	9%	9%	6%	4%	10%	7%	7%	8%	9%	11%	7%	10%	9%	
No, definitely not	6%	6%	8%	5%	6%	8%	-	5%	6%	6%	9%	7%	6%	6%	9%	9%	11%	9%	6%	5%	6%	8%	8%	7%	4%	6%	
Do you currently use bags for your recycling?																											
Yes	87%	88%	88%	87%	89%	87%	88%	87%	89%	88%	86%	83%	88%	86%	91%	83%	81%	86%	81%	84%	89%	82%	89%	84%	86%	87%	
No	12%	12%	12%	13%	11%	12%	13%	13%	11%	11%	13%	16%	12%	13%	9%	15%	19%	13%	18%	15%	11%	17%	11%	16%	13%	12%	

Table 1 (continued)

Respondents:	Total	Sex		Broad Age Group			More detailed Age Group					Disability							Disability and Age				Ethnicity			
		Female	Male	Under 45	45 - 64	65+	19 - 24	25 - 44	45 - 64	65 - 74	Over 75	Disabled	Not disabled	Physical impairment	Sensory impairment	Mental health condition	Learning disability/difficulty	Long standing illness or health condition	Yes - Other	Under 65 disabled	Under 65 not disabled	65+ disabled	65+ not disabled	BAME	White Other	White British
What is the reason you use bags for your recycling?																										
Not aware I could use boxes	16%	16%	17%	18%	15%	17%	25%	17%	15%	13%	19%	17%	16%	19%	14%	18%	4%	19%	10%	15%	17%	18%	15%	21%	21%	17%
Not all my recycling will fit in the box(es) provided	34%	34%	34%	43%	41%	20%	19%	43%	41%	28%	13%	22%	38%	21%	21%	35%	52%	28%	22%	40%	42%	13%	26%	37%	24%	34%
Don't know how to get more boxes	7%	8%	6%	8%	6%	8%	-	8%	6%	6%	10%	10%	6%	8%	5%	8%	4%	9%	6%	10%	7%	10%	7%	7%	10%	7%
More difficult / not physically able to use boxes	14%	15%	12%	8%	11%	22%	-	9%	11%	15%	28%	25%	9%	31%	30%	17%	11%	24%	30%	23%	7%	25%	13%	14%	11%	14%
Simpler to know how to use bags / not confident I would know how to use boxes	11%	11%	11%	11%	9%	11%	6%	11%	9%	9%	13%	11%	10%	9%	16%	17%	15%	13%	7%	9%	10%	11%	9%	9%	14%	10%
Thought there were some items that had to be recycled in bags and not in boxes	25%	25%	23%	27%	22%	25%	50%	26%	22%	25%	25%	23%	25%	25%	25%	23%	19%	23%	18%	24%	25%	23%	27%	28%	21%	25%
Easier to store bags	30%	29%	30%	24%	34%	31%	-	25%	34%	35%	27%	27%	30%	28%	29%	19%	19%	25%	37%	36%	28%	23%	35%	21%	17%	29%
Habit / what I've been doing for a while	17%	17%	17%	16%	15%	19%	6%	17%	15%	19%	20%	16%	17%	15%	13%	18%	15%	20%	21%	10%	16%	18%	19%	19%	16%	18%
Other:	15%	14%	19%	17%	19%	11%	31%	16%	19%	15%	7%	7%	18%	10%	9%	12%	26%	10%	15%	10%	18%	6%	16%	7%	17%	15%

Table 1 (continued)

Respondents:	Total	Sex		Broad Age Group			More detailed Age Group					Disability							Disability and Age				Ethnicity				
		Female	Male	Under 45	45 - 64	65+	19 - 24	25 - 44	45 - 64	65 - 74	Over 75	Disabled	Not disabled	Physical impairment	Sensory impairment	Mental health condition	Learning disability/difficulty	Long standing illness or health condition	Yes - Other	Under 65 disabled	Under 65 not disabled	65+ disabled	65+ not disabled	BAME	White Other	White British	
Do you currently receive the assisted collection service?																											
Yes	16%	18%	13%	1%	6%	40%	-	2%	6%	16%	59%	49%	2%	67%	59%	32%	19%	48%	49%	18%	1%	64%	7%	5%	19%	17%	
No	83%	81%	86%	98%	93%	59%	100%	98%	93%	82%	39%	50%	97%	31%	41%	65%	78%	50%	48%	82%	98%	35%	92%	93%	80%	82%	
How likely is it that you would be able to take your recycling box to the kerbside, if the Council swapped your bags for boxes?																											
Very likely	47%	46%	51%	63%	55%	26%	69%	63%	55%	41%	12%	18%	60%	6%	11%	31%	37%	18%	10%	39%	64%	7%	50%	56%	41%	48%	
Quite likely	13%	12%	13%	13%	15%	11%	13%	13%	15%	17%	6%	7%	15%	4%	16%	12%	7%	9%	7%	10%	14%	5%	18%	9%	19%	12%	
LIKELY	60%	58%	64%	76%	70%	37%	82%	76%	70%	58%	18%	25%	75%	10%	27%	43%	44%	27%	17%	49%	78%	12%	68%	65%	60%	60%	
UNLIKELY	6%	6%	6%	3%	6%	10%		4%	6%	9%	10%	12%	4%	12%	13%	8%	15%	11%	15%	12%	4%	12%	7%	11%	5%	6%	
Not sure	6%	6%	5%	5%	7%	6%	6%	5%	7%	7%	5%	6%	6%	4%	-	5%	4%	6%	8%	10%	5%	5%	7%	2%	1%	6%	
Quite unlikely	3%	3%	2%	1%	3%	5%	-	2%	3%	5%	4%	5%	2%	4%	4%	3%	11%	6%	8%	6%	2%	4%	5%	2%	1%	3%	
Very unlikely	3%	3%	4%	2%	3%	5%	-	2%	3%	4%	6%	7%	2%	8%	9%	5%	4%	5%	7%	6%	2%	8%	2%	9%	4%	3%	
To what extent do you agree with the Council's proposal to stop using recycling bags?																											
Strongly agree	28%	28%	29%	35%	25%	25%	38%	35%	25%	26%	24%	25%	30%	21%	27%	29%	37%	22%	19%	25%	31%	25%	28%	33%	30%	28%	
Tend to agree	20%	20%	19%	19%	20%	20%	38%	19%	20%	21%	19%	18%	20%	19%	20%	17%	7%	22%	17%	15%	20%	19%	23%	14%	27%	20%	
AGREE	48%	48%	48%	54%	45%	45%	76%	54%	45%	47%	43%	43%	50%	40%	47%	46%	44%	44%	36%	40%	51%	44%	51%	47%	57%	48%	
DISAGREE	36%	34%	37%	30%	40%	35%		31%	40%	38%	32%	34%	35%	36%	22%	34%	45%	34%	42%	40%	34%	31%	37%	39%	29%	35%	
Neither agree nor disagree	16%	17%	14%	15%	14%	18%	19%	15%	14%	12%	23%	22%	14%	21%	29%	19%	7%	20%	21%	19%	14%	23%	13%	12%	13%	16%	
Tend to disagree	14%	13%	14%	14%	15%	12%	6%	14%	15%	14%	10%	10%	15%	10%	9%	12%	19%	12%	10%	12%	15%	8%	15%	16%	13%	14%	
Strongly disagree	22%	21%	23%	16%	25%	23%	-	17%	25%	24%	22%	24%	20%	26%	13%	22%	26%	22%	32%	28%	19%	23%	22%	23%	16%	21%	

Consultation Comments

The Consultation Output Report provides full details of comments received, however, the following shows information in relation to equalities-related comments received.

Table 2 shows the comments received in response to the consultation question: “*What is the reason you use bags for recycling?*” A total of 609 comments were made in response to this question.

Table 2 – Table to show comments received as grouped into themes (the number of comments received relating to each theme area is shown)

Comment ‘Theme’	Number of comments
Bags are easier to manage, handle and store	60
Boxes are more difficult and cumbersome to carry	45
Boxes- lack of space and storage to keep them	34
Bags can be hung up - no lifting	12
Bags are colour coded / easier to understand recycling	3

In respect of the consultation question “*how likely is it that you would be able to take your recycling to the kerbside, if the Council swapped your bags for boxes?*” consultees were asked a follow-on question “*If quite or very unlikely, please tell us why*”. The following table shows information in relation to equalities-related comments received. A total of 140 comments were made to this question.

Table 3 – Table to show comments received as grouped into themes (the number of comments received relating to each theme area is shown)

Comment ‘Theme’	Number of comments
Boxes- Too heavy to carry	35
Boxes- Difficult/cumbersome to carry	31
Disability	19
Bags- are lighter/easier to carry	17
Health condition/recovering from surgery	15
Old age- frail/ limited mobility	12
Boxes- Nowhere to store them	10
Back strain problems	9
General mobility issues	7
Will take away independence	4
Bags- Easier to store	4
Boxes- should have wheels to move them	3
Boxes- Take up too much space on pavement	3

In respect of the consultation question “*what impact, if any, would this change have on you?*” the following shows information in relation to equalities-related comments received. A total of 1,739 comments were made in response to this question.

Table 4 – Table to show comments received as grouped into themes (the number of comments received relating to each theme area is shown)

Comment ‘Theme’	Number of comments
Bags are easier to manage, handle and store	156
Long term health condition (may need assistance/support)	83
Disability/ old age (may need assistance/support)	76
Bags can be hung up- no lifting involved	32
Bags are colour coded easier to sort recycling	16
Want to continue being independent	6
Changes make people anxious/negative impact on mental health	6

In addition, two comments were received regarding potential difficulties in getting children involved in recycling. It was mentioned that “*children understand the colour coding of the bags but wouldn’t know where to put things if it were all green boxes*”.

It is also noted that specific feedback was received from the South Gloucestershire Over 50s Forum and the South Gloucestershire Disability Action Group. These responses are shown in Appendix 1 to this EqIAA.

Further Research and Consultation Information

In addition to the consultation results, it is worth noting that the council runs a survey on an annual basis in relation to its budget setting process. Levels of satisfaction with a range of services, including the waste and recycling service, are investigated within this survey and the following table presents the results received over the last 6 years.

Table 5 – Table to show satisfaction levels with the council’s waste and recycling Service as elicited through annual consultation over the last 6 years.

Year	Overall	Female	Male	Under 45	46 to 65	Over 65	Disabled	Non disabled	White British	BAME & ‘White Other’
2014/15	70%	73%	69%	67%	70%	76%	52%	73%	72%	59%
2015/16	64%	62%	66%	62%	60%	71%	59%	66%	65%	63%
2016/17	69%	72%	67%	63%	72%	72%	68%	69%	71%	66%
2017/18	69%	73%	67%	69%	68%	72%	61%	71%	71%	70%
2018/19	70%	75%	66%	65%	65%	73%	64%	72%	72%	65%
2019/20	71%	74%	69%	76%	67%	79%	70%	72%	72%	63%

Overall, there is a good level of satisfaction with the council’s waste and recycling Service. The data show that people over 65 are slightly more satisfied with the service than the overall response data shows. Historically, Disabled People have shown a lower level of satisfaction when compared to the overall figure; however, greater publicity of the assisted collection service in particular has taken place and based on informal feedback this is a key reason cited for the increase in satisfaction levels of Disabled People over recent years. It is also noted that people from BAME backgrounds have largely comparable satisfaction levels to the overall data except during 2 of the years shown (2014/15 and 2019/20).

It is also worth noting that a survey was run by the StreetCare Service during 2017 and this included an investigation of satisfaction levels in regard to the waste and recycling service. The data in respect of recycling collections shows the following:-

Table 6 – Table to show results of the 2017 StreetCare survey in respect of resident satisfaction levels with ‘recycling collections’.

	Overall	Sex		Age							Disability							Ethnicity			
		Female	Male	16 to 24 years old	25 to 34 years old	35 to 44 years old	45 to 54 years old	55 to 64 years old	65 to 75 years old	Over 75 years old	Physical impairment	Sensory impairment	Mental health condition	Learning disability / difficulty	Long standing illness or health condition	Other	No Disability	Disability	White British	White Other	BAME
Base	1953	1063	823	29	202	294	380	396	423	114	88	25	38	7	88	35	1633	186	1714	65	29
Satisfied	69%	71%	69%	62%	66%	64%	66%	71%	76%	86%	66%	64%	71%	86%	61%	85%	70%	66%	70%	72%	69%
Dissatisfied	19%	19%	19%	20%	24%	24%	20%	17%	13%	9%	23%	28%	24%	-	32%	9%	17%	25%	18%	17%	24%

Again, this survey shows an overall good level of satisfaction with the council’s recycling service. The data again show that people over 65 are slightly more satisfied with the service than the overall response figure. People with a long standing illness or health condition are the group with the lowest level of satisfaction with the service.

SECTION 3 – IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

The consultation data show:

Those groups reporting a lower likelihood of using boxes for recycling currently were (11% to 19%):

- Over 75s
- People with a physical impairment
- People with a sensory impairment
- People stating a disability under the 'Other' category
- 66% to 68% of people identifying with these groups stated they did use a box compared to the overall figure of 76%

Those groups reporting a lower likelihood of knowing how to obtain additional boxes were:

- Over 65s
- Over 75s
- Disabled People
- People with a physical impairment
- People with a sensory impairment
- People with a long standing illness or health condition
- People stating that they were both over 65 and disabled

Those groups more likely to state that it is more difficult / they are not physically able to use boxes were (17% to 30%):

- Over 65s
- Over 75s
- Disabled People
- People with a physical impairment
- People with a sensory impairment
- People with a mental health condition
- People with a long standing illness or health condition
- People stating a disability under the 'Other' category
- People stating that they were both under 65 and disabled
- People stating that they were both over 65 and disabled

Those groups more likely to state that it is simpler to know how to use bags / not confident I would know how to use boxes were (13% to 17%):

- Over 75s
- People with a physical impairment
- People with a sensory impairment
- People with a mental health condition
- People with a learning disability/difficulty
- People from a 'White Other' background

Those groups more likely to state that it is easier to store bags were (34% to 37%):

- People aged 45 – 74
- People stating a disability under the 'Other' category
- People stating that they were both under 65 and disabled

People more likely to use the council's assisted collection service were (18% to 67%):

- Females
- Over 65s
- Over 75s
- Disabled People
- People with a physical impairment
- People with a sensory impairment
- People with a mental health condition
- People with a learning disability/difficulty
- People with a long standing illness or health condition
- People stating a disability under the 'Other' category
- People stating that they were both under 65 and disabled
- People stating that they were both over 65 and disabled
- People from a 'White Other' background

Those groups more likely to state a lower likelihood of being able to take recycling box to the kerbside if the council swapped bags for boxes (9% to 15%) were:

- Over 65s
- Over 75s
- Disabled People
- People with a physical impairment
- People with a sensory impairment
- People with a mental health condition
- People with a learning disability/difficulty
- People with a long standing illness or health condition
- People stating a disability under the 'Other' category
- People stating that they were both under 65 and disabled
- People stating that they were both over 65 and disabled
- People from a 'BAME' background

Those groups more likely to agree / disagree with the council's proposal to stop using recycling bags were:

More likely to agree (54% to 76%)	More likely to disagree (40% to 45%)
<ul style="list-style-type: none">- Under 45s- People from a 'White Other' background	<ul style="list-style-type: none">- People aged 45 – 64- People with a learning disability/difficulty- People stating a disability under the 'Other' category- People stating that they were under 65 and disabled

Key Issues Arising

The data very clearly raises issues to be addressed and these issues particularly relate to the Protected Characteristic of Disability and the Protected Characteristic of Age.

The issues raised are also borne out in the comments received to the consultation as shown in tables 2, 3 and 4.

Overall, the issues raised relate to the following five key areas which require consideration:-

- **Bags are easier to manage and handle than boxes.** This is an issue that may affect any resident, however, the issue affects those who have reduced or limited mobility or strength to a proportionately greater extent. As such, this is clearly linked to the Protected Characteristics of Disability and Age where Disabled and Older People are proportionately more likely to find a bag easier to manage than a box.
- **Boxes are more difficult to store.** This raises potential issues for those living in smaller premises. Although there is no precise data available on property size and Protected Characteristics, a link can be made between poverty and likelihood of living in smaller sized properties. In regard to this, disabled people are nearly three times as likely to experience severe material deprivation as non-disabled people¹. This leads to the potential for Disabled People to be proportionately more likely to be living in smaller sized properties.
- **Boxes take up too much space on pavements.** This raises issues in respect of navigating pavements. Items on pavements can present barriers for residents and this includes, for example, wheelchair users, people using walking aids such as frames, as well as people with pushchairs and buggies.
- **Bags are colour coded and easier to sort recycling.** This issue has implications for all residents, however, some groups, in particular disabled people (as evidenced in the consultation data), have stated a lower likelihood of understanding how to use boxes. In addition, the consultation responses raise the potential for children being less likely to understand recycling approaches where there is no colour coding of receptacles.
- **Want to continue being independent.** This is clearly an equalities issue and raises the Protected Characteristics of Disability and Age. Maintaining independence through carrying out tasks such as recycling can clearly assist people in maintaining confidence, self-confidence and an overall positive sense of personal well-being.

Overall, following on from the above 5 key areas / issues, a negative impact has been identified in respect of the proposal to remove recycling bags from kerbside collections. The negative impact identified particularly relates to the Protected Characteristics of Disability and Age. This EqIAA now goes on to investigate the issues emerging and understand any actions which may be taken to remove or mitigate negative impacts.

¹ Is Britain Fairer? 2018, Equality and Human Rights Commission, 2018

Issue Arising	Mitigation
Bags are easier to manage and handle than boxes	<p>It is accepted that bags are easier for many to handle than boxes and the consultation comments provide a range of examples which reinforce this (e.g. the South Glos Over 50s Forum stated “...with a frame, walking stick etc. a box is quite difficult to be managed whereas a bag can be dragged”.)</p> <p>The council’s assisted collection service is available to all those requiring it, whether this be on a temporary or permanent basis. This is an important service which is well received by residents. Indeed our ongoing research identifies an increase in satisfaction levels of Disabled People with the waste and recycling service and based on informal feedback a key reason for this has been the roll out of the Assisted Collection Service.</p> <p>Further publicity regarding the Assisted Collection Service should be actioned to ensure that residents are aware of its availability. Actions to be taken in respect of this are shown in Section 5 of this EqIAA.</p>
Boxes are more difficult to store	<p>Residents are able to store their recycling indoors in any type of bag and decant these items into a recycling box prior to collection. There are numerous ways in which residents can participate in recycling whilst conveniently storing boxes.</p> <p>The council should conduct work to publicise a wide range of information, tips and guidance for residents on managing and taking part in recycling.</p> <p>Actions to address the development and publicity of a wide range of information, tips and guidance are planned for in Section 5 of this EqIAA.</p>
Boxes take up too much space on pavements	<p>All waste containers, once emptied, should be placed in such a way as to avoid presenting barriers for residents. This issue can especially affect disabled people (e.g. wheelchair users) as well as residents using pushchairs and buggies.</p> <p>The council sets out an action to work with collectors on an ongoing basis to address this in Section 5 of this EqIAA.</p>
Bags are colour coded making it easier to sort recycling	<p>Different colours used for bags can be helpful to residents. However, it is apparent from research and the consultation itself that confusion exists regarding how to recycle and present recycling for collection. Taking this issue forward, the council should conduct work to communicate a wide range of information, tips and guidance to enhance resident awareness of recycling requirements.</p> <p>Actions to address this work are planned for in Section 5 of this EqIAA.</p>
I want to continue being independent (being able to manage my own waste and recycling is a key part of my independence)	<p>This is an important issue recognised by the service. There are numerous ways in which residents can participate in recycling whilst maintaining their independence.</p> <p>Actions to address the development and publicity of a wide range of information, tips and guidance are planned for in Section 5 of this EqIAA.</p>

It is also noted that the council does not plan to proactively remove bags from the system. Residents have the option to continue using their bags, however, should a bag become lost or damaged, it would be replaced with a box.

Options considered

The option of maintaining the provision of white and green bags for recycling was considered. This included sourcing UK manufactured bags to reduce the environmental impact. However, UK manufactured bags cost at least double those imported from China, and more than the cost of UK manufactured boxes. This option does not address the issues listed on page 2 and therefore this is not considered a viable option.

Consultation responses asked if it would be possible to use one wheelie bin for recycling collections. This option cannot be considered due to the Waste (England and Wales) Regulations 2011 which came into effect for businesses and councils on 1 January 2015. The regulations stipulate that materials such as paper, metal, plastic and glass must be collected separately. Councils may only continue to collect materials in a single 'comingled' stream if it is possible to demonstrate that separate collections are not technically, environmentally or economically practical (TEEP). The council has not previously had comingled collections and therefore it is not possible to demonstrate collecting materials separately is not technically, environmentally or economically practical.

The use of an alternative style bag, for example a hessian sack, may reduce some of the environmental issues with the current supply. However, it would not eliminate other issues, including cost, and may create additional issues, such as needing to dry bags during wet weather.

The previous strategy also considered alternative containers (see [Waste Strategy Evidence document](#) pages 33 - 39). As a result of feedback gathered at that time alternative containers have not been reconsidered.

SECTION 4 – EqIAA OUTCOME

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input type="checkbox"/>	
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input checked="" type="checkbox"/>	<p>Negative impacts, particularly surrounding the Protected Characteristics of Disability and Age, have been identified in respect of the proposal to remove recycling bags for kerbside collections.</p> <p>In respect of these impacts, alternative options have been considered and assessed. As a result, actions have been identified which bring with them a clear potential to provide good levels of mitigation and these actions are shown in Section 5 below.</p>
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

SECTION 5 – ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

	Action	Timescale	Responsibility
1	Residents have told us there is confusion over how to sort recycling for collection. Communications regarding collection services are ongoing throughout the year but the following actions have been identified.		
a.	Create and publicise simpler information about the collection service, including the use of images to support messages.	March 2019 - ongoing	StreetCare Community Engagement Officer
b.	Create and publicise, including at disabled and older people's forums, a range of information, tips and guidance for residents on how to effectively and easily participate in recycling.	March 2019 - ongoing	StreetCare Community Engagement Officer
c.	Residents will be permitted to continue using existing bags (but these will not be replaced if lost or damaged). This will allow time for the simpler messaging to be rolled out supporting residents as they move to the use of boxes.	March 2019 – ongoing	Waste Operations Manager
2	Ensure wider publicity of the assisted collection service, including publicity at disabled and older people's forums.	March 2019 - ongoing	StreetCare Community Engagement Officer
3	Work with collectors to ensure good positioning of empty bins and containers once emptied in order to ensure clear pavements for residents.	ongoing	Waste Operations Manager

SECTION 6 - EVIDENCE INFORMING THIS EqIAA

- South Gloucestershire Council, Removal of Recycling Bags for Kerbside Collections 2019, Consultation Output Report, February 2019
- StreetCare Resident Survey results, 2017
- South Gloucestershire Council Revenue Budget Survey Results, 2014 - present
- Is Britain Fairer? 2018, Equality and Human Rights Commission, 2018
- Waste Strategy Evidence document
- South Gloucestershire Council Waste Strategy 2015-2020
- Waste (England and Wales) Regulations 2011

Appendix 1



South Glos Over 50's Forum
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Warmley
Bristol BS30 8XU

Email: southglosover50s@gmail.com

Website: <http://southglosover50sforum.btck.co.uk/>

Mobile: 07967102141

17th January 2019

Dear Consultation Team,

Consultation on the removal of recycling bags got kerbside collections.

The Forum would like to comment on your consultation by letter as what we need to say does not fit your questionnaire.

You will understand that the South Gloucestershire Over 50's Forum is a volunteer organisation established 25 years ago to ensure the voice and representation of residents are heard.

We should say that we understand the environmental issues but feel that this is purely to reduce costs, which IF it is a better model to meet residents needs then we understand the proposal. Sadly people feel you have already made the decision and are purely asking for views in the hope they fit the changes to be made.

1. We presume the Council will be supplying the new boxes as it does not explicitly say so in your consultation.
2. Currently the green boxes are made of a material that is very brittle. As we grow older we cannot always lift such a box so may have to kick it to get it to the kerbside or the bin operatives throw them to the drive causing them to crack, chip and break. We hope they will be made of a more pliable material.
3. We will respond later to the assisted collection service but there may be weeks when an older person has more recycling and cannot move the boxes themselves. This is why we mention kicking the box to the roadside. The person may want to be independent but with a frame, walking stick etc a box is quite difficult to manage whereas the bag can be dragged.
4. There is no mention of lids or nets for the boxes so how is it proposed this will prevent items being blown along the street particularly during strong winds?

We feel that bin operatives often leave fallen items on the road, which just adds to items blown by the wind from the recycling.

5. Older people may not be able to lift one full box on top of another, as we have heard be mentioned as a way to save space and keep items in place.
6. Assisted collection service. This would be great but it needs publicising. It needs to be remembered that people may need this service short term – whilst recovering from a short illness or a stroke or cancer treatment for example – as well as people who long term cannot manage taking their rubbish to the road edge. Health services are trying to ensure people only go into hospital when critical so more people will require assisted support, please.
7. Plastics are probably the hardest thing to know what to put in general rubbish and what can be recycled. We need a visual card, like the card giving which dates our collection, recycling or black bin, which are generally very well received, giving instruction as to which plastic goes in which bag or box. Some local authorities collect all plastics and then have a sorting system.

Sadly we have not had a Forum meetings since being informed of the consultation. We meet 3 times a year in 4/5 areas of South Gloucestershire so we are accessible to all residents over 50.

We would be grateful to know who we could contact from waste management by email or phone so we could invite an officer to talk with us and answer queries.

We hope our response will be noted as the service moves forward.

Yours sincerely,



Margaret Slucutt
Chair

South Gloucestershire Disability Action Group Feedback

'As a group we felt that if assisted collections for residents who cannot manage to present their recycling boxes continue, then the service would still support residents with disabilities to recycle. We think boxes will probably be easier for residents with an assisted collection to use as a number of boxes are available for different materials and these would not need to be opened up like a bag would to deposit material. There is also an opportunity to simplify the information leaflet if recycling boxes replace bags'