

Recycling and Waste Management – Conwy County Borough Council

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Why we did this audit

- The Council's recycling rate has been consistently ahead of the current national target and is close to achieving the future, more difficult target. Our audit aims to help the Council understand what factors explain its success and what potential barriers might prevent future performance improvement.
- Recent changes in non-domestic recycling regulations require businesses and public sector organisations to segregate waste. This presents a potential opportunity for the Council to consider expanding existing commercial waste services.
- As a high performing service, our review can identify good practice and learning for other services.
- To support the Auditor General's duties under Section 17(d) of the Public Audit (Wales) Act 2004 and Section 15(2)(b) of the Well-being of Future Generations (Wales) Act 2015.



Key facts

We have identified the following key facts that provide context and insight into the performance and finances of the Council's waste service. They illustrate the environment that the service operates within and some of the challenges faced. Additional graphs that provide wider context on these facts are contained in **Appendix 1**.

Spending

Spending is the key driver of service provision, which drives performance outputs.



- In 2022-23, the Council spent £85.64 per resident on waste¹. This is 18% below the rate for Wales overall, which spent £15.55 more per resident.
- In the same year, the total spent on waste was £9.8 million. This represents 3.1% of total spend by the Council, which is 0.6% less than the proportion for Wales overall (3.7%).

Income and savings²

To help mitigate budget pressures on service provision, the Council can look to obtain additional income from discretionary services or make additional efficiency savings. Both require a balance of additional risks and benefits.



- In 2022-23, the Council made a surplus of £0.24 million on commercial waste contracts. This represented 1.3% of net expenditure.
- In 2024-25, the Council requires £0.13 million of savings from its waste service.

Fleet²

Vehicles are critical to service delivery and resilience, making them a key cost to the service.



- The Council has invested £2.6 million on new vehicles in 2023-24. Nine of these vehicles will be electric. To fund this, the Council utilised £1.6 million of Welsh Government grant.

¹ Audit Wales analysis of Stats Wales, [Revenue outturn expenditure, by authority and service](#)

² Conwy CBC data

- The Council policy for vehicle lifespan is to replace after seven years. 42% of the current fleet is currently above this threshold, particularly general refuse where 67% of vehicles over the replacement threshold.
- The fleet cost £0.5 million to repair and service in 2022-23. This represented 45% of total service fleet costs.
- The Council has estimated £0.18 million annual savings in fuel costs through use of electric vehicles. This would represent a 27% reduction on 2022-23.

Fly-tipping

Fly-tipping is the most visual impact of non-compliance with waste policy, which can have environmental and financial impacts for the Council.



- In 2022-23, the Council took enforcement action 389 times in relation to fly-tipping³. This represents 1.4% of enforcement taken in Wales.
- 99% of enforcement actions taken by the Council were investigations (385). This was 8% higher than the national proportion, with greater levels of other actions used in other areas.
- In the same year, Conwy recorded 1,601 incidents of fly-tipping, which represented 4% of the Wales total⁴.



What does good look like⁵

The Welsh Government has set long-term targets for the recycling of waste. These are 64% by 2019-20 and 70% by 2024-25. We would expect the Council to have a realistic and funded strategy to meet statutory targets and contribute to wider corporate objectives, such as well-being objectives.

We would expect the Council to have arrangements in place to review and respond to both performance and risk to inform service planning and resourcing.



What we looked at

The audit sought to answer the overall question - **Does the Council understand the reasons for its recycling performance and have robust plans to meet current and future statutory recycling targets?**

To do this we looked to answer the six sub-questions and apply our audit criteria, as set out within **Appendix 2**.

Our scope included the Council's arrangements for securing value for money and application of the sustainable development principle in both domestic and non-domestic recycling. Our review covered the period since statutory targets have applied (2012-13). We did not review the case for the frequency or method of waste collection, nor the processing of waste collected. We analysed both public and Council-held data, reviewed documents, and held interviews with officers and the Cabinet Member for Neighbourhood and the Environment. All financial data from Stats Wales and the Council is reported in cash terms.

³ Stats Wales, [Number of fly-tipping enforcement actions by type](#)

⁴ Stats Wales. [Recorded fly-tipping incidents by local authority](#)

⁵ Defined as 'what should be' according to laws or regulations, 'what is expected' according to best practice, or 'what could be' given better conditions.



What we found

Overall, the Council is delivering an effective and efficient waste service that currently meets statutory targets, which looks well placed to achieve higher statutory targets. To support meeting future, higher statutory targets the Council should look to strengthen arrangements to address areas of risk and more clearly apply the sustainable development principle.

The Council:

- has delivered a service that has met statutory targets (**Exhibit 1**), whilst spending below the national rate per resident in recent years (**Exhibit 2**). This would suggest arrangements have been effective in delivery, as well as in considering cost to the Council. This may have to be reconsidered as statutory targets become more challenging to meet.
- makes good use of the data and benchmarking resources available to it. It uses this information in discussion between officers to develop its understanding of its current performance and find areas for improvement.
- is developing a Waste Strategy that will formally document a high-level vision for its waste and recycling service based on current performance and drivers. This will use the knowledge and vision already articulated by officers.
- has a strong mix of partners that bring a range of skills and perspectives to support and enhance the service in an effective way. It uses third sector partnerships to best meet their common goals and by doing so providing benefit to the wider community.
- has received high levels of involvement when communicating with residents, which demonstrates the value placed on the service by residents. For example, over 11,000 residents responded to a consultation on collection frequency, by distributing and collecting responses through waste collections.
- has achieved a financial surplus on commercial waste contracts provided in addition to domestic statutory collections. This could be used to reduce savings required or be reinvested into commercial waste service to grow revenue further.

However, despite this, the Council has:

- lacked a waste strategy to set a strategic vision for the service. Whilst this has not impacted achievement of statutory targets to date, this poses additional risks when higher targets are introduced. The Council has already acted to address this risk.
- not used data and information received in a structured or systematic way that may limit the potential for tracking and review of actions to drive service change. Actions arising from data reviews were not documented, which would lead to a resilience risk should officers leave temporarily, such as due to sickness, or permanently.
- experienced a rise in fly-tipping that has grown above the national rate. Since 2012-13, fly-tipping incidents have grown in Conwy by 71.2% (**Exhibit 4**), which is well ahead of the 14.3% increase nationally. In response, the Council has not regularly responded with enforcement action. When comparing cases reported to enforcement responses, the Council may⁶ only have taken enforcement action in 24% of incidents in 2022-23. Enforcement can vary widely from an investigation being opened to legal action.
- not learnt lessons from their performance to potentially use elsewhere. For example, the service identified an effective involvement campaign held in 2015 but have not repeated this either by the waste service or by the wider Council. This has led to lower response rates from residents since despite already having developed a successful approach.

⁶ Due to limitations in how this data is reported nationally, an incident of fly-tipping could be recorded as two enforcement actions. For example, an investigation could then lead to a fixed penalty notice, which would be recorded as two actions.

- not planned in the longer-term to replace ageing assets. This indicates that the Council has not allocated capital resources in a planned way over the useful life of assets, potentially exposing the council to significant risks, particularly around resilience and cost. In recent years, the Council has spent a significant and growing proportion of fleet spending on the service and repair of its existing waste (**Exhibit 3**). Assuming newer vehicles are likely to require less repair, the Council could find significant savings from reducing these costs, particularly where vehicles are financed by Welsh Government grants rather than loans. When combined with relative fuel costs between electric and diesel vehicles, further savings are likely to be significant.
- generally missed oversight and challenge from elected members in reviewing performance or informing strategic decisions. For example, the decision to not expand commercial waste collections in response to non-domestic waste regulation change was made by the service, rather than through the democratic process. Whilst officers clearly articulated valid reasoning for not pursuing this service this was a potential opportunity for transformation in response to regulation change. However, as a potentially significant strategic decision, it was not subject to decision robust scrutiny and challenge that the democratic process should provide. This may limit member influence and understanding of a service identified as a key priority by residents.



What we recommended

R1 – To enable and support the implementation and review of improvements, the Council should formally document their review of services performance, financial, and other data. This should include:

- **R1.1** – An analysis of Strengths, Weaknesses, Opportunities, and Threats or equivalent analysis of strategic position.
- **R1.2** – Include an analysis of the five ways of working to support the service clearly implement and consider the sustainable development principle. This should look to learn lessons around citizen involvement for both the service and wider Council.
- **R1.3** – Consideration of longer-term objectives to set a vision beyond the draft Waste Strategy.

R2 – The Council should complete an analysis of causes of fly-tipping to support improvement in rates and inform an action plan to make enforcement a realistic tool. This should include an assessment of the value for money of prevention activity against the cost of fly-tipping.

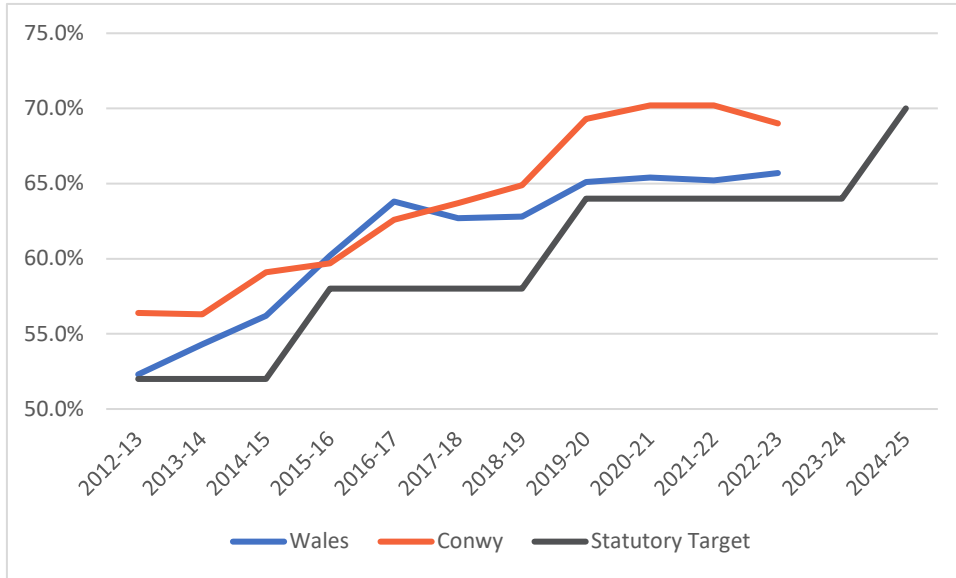
R3 – To enable wider strategic decision making and knowledge, the Council should review opportunities to report performance and opportunities, such as commercial contracts, to elected members.

R4 – The Council should review its arrangements for the funding and replacement of vehicles, plant, and equipment over asset useful lives to ensure services are resilience and exploit potential savings in running costs.



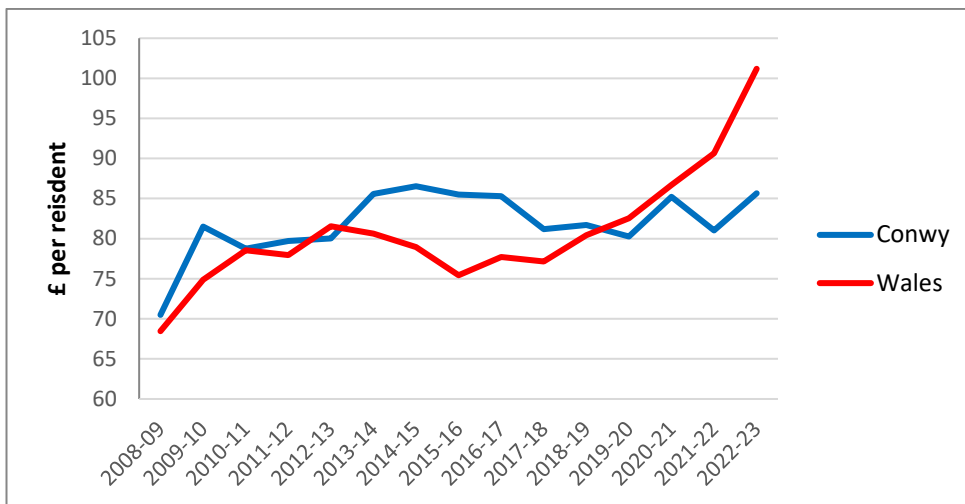
Appendix 1 – additional data

Exhibit 1: Recycling, preparation for re-use and composting statutory targets compared with actual performance by Conwy CBC and the national rate, 2012-13 to 2024-25



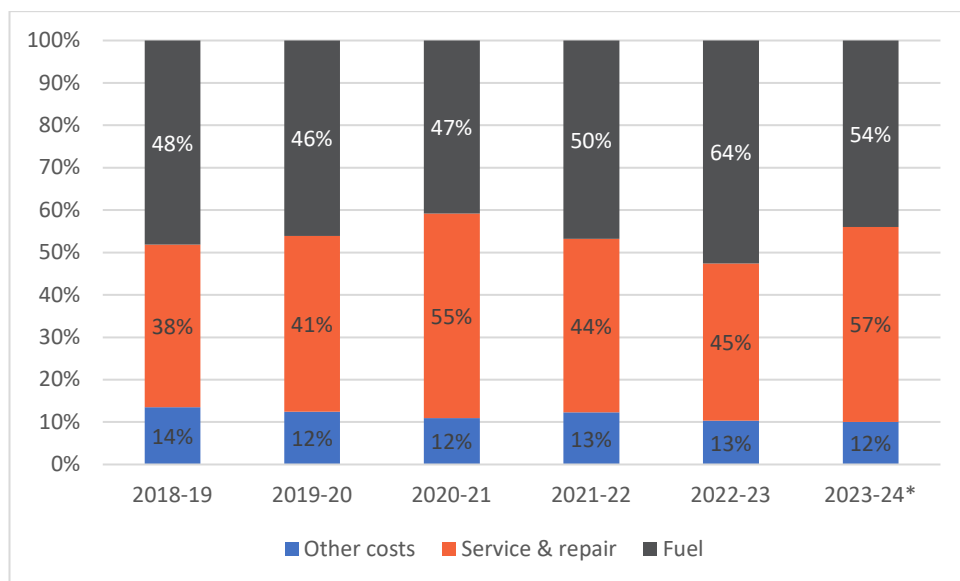
Source: Audit Wales analysis of [Stats Wales](#) and the [Waste \(Wales\) Measure 2010](#)

Exhibit 2: Net revenue expenditure on waste per resident by Conwy CBC and nationally, 2008-09 to 2022-23



Source: Audit Wales analysis of [Stats Wales](#)

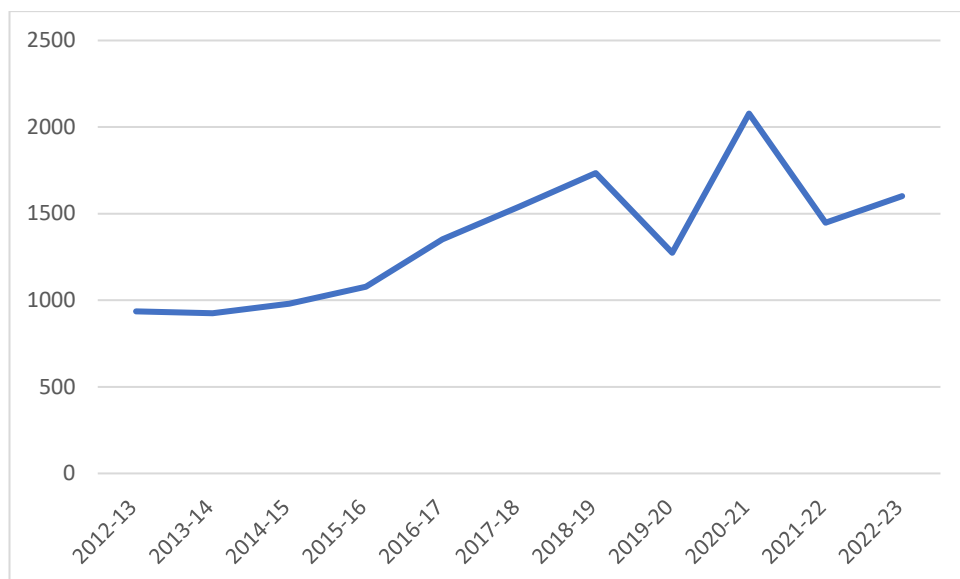
Exhibit 3: Waste fleet costs by type in Conwy CBC, 2018-19 to 2023-24



Note: Costs up to and including February 2024 only.

Source: Conwy CBC

Exhibit 4: fly-tipping incidents recorded in Conwy, 2012-13 to 2022-23



Source [Stats Wales](#)



Appendix 2 – audit questions and criteria

The audit sought to answer the overall question ‘**Does the Council understand the reasons for its recycling performance and have robust plans to meet current and future statutory recycling targets?**’. In answering this question, we asked applied the following criteria:

Level 2 Questions	Level 3 Questions	Audit Criteria
Does the Council understand the reasons for its recycling performance and how it might change over time?	Is there is a thorough understanding of the ‘as is’ (ie current need/ demand/ performance/ costs/ issues to be addressed) and the reasons why/underlying causes?	<ul style="list-style-type: none"> • The Council has drawn on a range of information to develop a thorough understanding of the ‘as is’ and how it is likely to change. • The Council benchmarks its costs, performance, and processes from a value for money perspective. • The Council has used its evidence base to identify actions that are likely to be most effective and why, including how they could address the root causes of problems, and informs decisions that seek to balance the need to meet short and longer-term objectives.
	Is there is a thorough understanding of the long-term factors that will impact recycling performance and the challenges and opportunities that may result (eg risks and opportunities)?	
Does the Council have a clear vision of what it wants to achieve for its recycling performance?	Is the Council planning over an appropriate timescale?	<ul style="list-style-type: none"> • The Council has considered what long term means in this context and set an appropriate timescale (e.g. ten years, 25 years or longer). It has considered how action can deliver the best impact over that timeframe, has set out measures that reflect short and long-term impacts, with milestones that reflect progress as appropriate. • It has set out how the plans will be resourced over the longer term as far as is practical.
	Has the Council thought about the wider impacts it	<ul style="list-style-type: none"> • The Council has considered the contribution to and links between social, economic, environmental and cultural well-being/the seven

Level 2 Questions	Level 3 Questions	Audit Criteria
	<p>could have, including;</p> <ul style="list-style-type: none"> • How it could contribute to each of the seven national well-being goals? • How delivery will impact on the other things it is trying to achieve (ie its well-being objectives and wider priorities)? • How delivery will impact on what other public bodies are trying to achieve (ie their well-being objectives)? 	<p>national well-being goals (including how this might help it deliver system-wide, preventative benefits).</p> <ul style="list-style-type: none"> • Staff have sought to integrate their work with that of their colleagues from across the organisation and partner organisations and have proactively shared information, and are open and transparent with their colleagues and partners. • The Council understands what colleagues and partners do and how their work relates, and integration is evident in key strategies/documents, including joined-up objectives/priorities and performance measures.
	<p>In developing its plans, does the Council give due regard for its duties under the Equalities Act 2010:</p> <ul style="list-style-type: none"> • Equalities duties • Socio-economic 	<ul style="list-style-type: none"> • The Council has considered the potential impact of its plans on groups who share protected characteristics and modified its plans if appropriate as a result. • There is evidence that the Council has considered if its plans can improve inequality of outcome for people who suffer socio-economic disadvantage and modified its plans if appropriate as a result.
<p>Is the Council working effectively with the right people and partners?</p>	<p>Has the Council identified whom it needs to involve in designing and delivering plans to meet current and future statutory recycling targets?</p>	<ul style="list-style-type: none"> • The Council has a good understanding of who will be directly and indirectly affected and whom it needs to involve, and seeks a full diversity of views, including from non-traditional sources and from those they may have previously failed to reach.
	<p>Is the Council effectively involving the full diversity of the population?</p>	<ul style="list-style-type: none"> • The Council has provided genuine opportunities for people to influence design and delivery from an early stage. It has built mature and trusting relationships, sharing information in an honest, open and transparent way, and providing feedback on how it has been used. It has used

Level 2 Questions	Level 3 Questions	Audit Criteria
		<p>the results of involvement to shape planning/delivery and draws on good practice.</p>
	<p>Is the Council working with the right partners?</p>	<ul style="list-style-type: none"> The Council has identified the partners it needs to work with to deliver its vision and objectives and has a clear understanding of how it could work with others and the key challenges they face. There is a focus on place and better outcomes.
	<p>Is the Council effectively collaborating with the right partners?</p>	<ul style="list-style-type: none"> The Council has mature and trusting relationships with its partners, because, for example, it invests time and capacity in partnership working. It is sharing or pooling financial or non-financial resources and has developed shared ways of working.
<p>Has the Council resourced delivery of the plans to meet current and future statutory recycling targets so it can deliver long-term/preventative benefits?</p>	<p>Does the Council understand long-term resource implications?</p>	<ul style="list-style-type: none"> The Council understands the benefits of investing in long-term, preventative approaches and the cost (both financial and in terms of outcomes) of not doing so. It has thought about the resources it will need to deliver planned outcomes over the medium and longer term (whole life costs) and how it could manage risks/meet those costs, and seeks to minimise waste/negative impact on resources throughout delivery.
	<p>Does the Council allocate resources to deliver better outcomes over the long term?</p>	<ul style="list-style-type: none"> The Council has considered the resources it will need to deliver sustainable, longer-term outcomes and how it might manage any risks. It has taken action (including preventative action) that is likely to contribute to better outcomes and/or use of resources over the longer term that are promoted and supported. It considers how funding can be deployed to support the delivery of objectives in an integrated way.
	<p>Has the Council clearly planned and resourced itself to apply non-domestic recycling regulations in its own premises?</p>	<ul style="list-style-type: none"> The Council can clearly demonstrate an understanding of the non-domestic recycling requirements and has a plan to apply this to its own premises. This plan has a clear timescale, actions, and is realistically resourced.

Level 2 Questions	Level 3 Questions	Audit Criteria
Is the Council monitoring and reviewing progress?	Is the Council monitoring and reviewing progress towards, short, medium and longer-term objectives?	<ul style="list-style-type: none"> The Council has set out measures that reflect short and long-term impacts, with milestones that reflect progress as appropriate. These measures reflect: the delivery of outcomes relating to social, economic, environmental and cultural wellbeing, assessment of financial costs and performance.
Is the Council learning lessons from how it works to deliver against its recycling targets?	Is the Council seeking to learn lessons from its own performance to improve its arrangements?	<ul style="list-style-type: none"> The Council makes use of performance, budget and other relevant information to make improvements to its arrangements.
	Is the Council seeking to learn lessons and improve its approach to involvement?	<ul style="list-style-type: none"> The Council reviews the effectiveness of its involvement activity and is learning lessons (from success and failure) and improving its involvement.
	Is the Council seeking to share practice or learn lessons to support improvement in its approach to collaboration?	<ul style="list-style-type: none"> The Council reviews the effectiveness of its collaborative activity and is learning lessons (from success and failure) and improving its collaboration.



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