

# Introduction

We are grateful to all those who are working to maintain waste collection and disposal services safely in communities across Scotland at this time. These services are vital in order to protect public health and the environment.

The Scottish Government and COSLA have been working closely with Local Government and partners from across the waste industry through our Waste and Resources Sector Forum to identify pressures that have arisen as a result of the COVID-19 outbreak and to ensure resilience across the sector.

During this national crisis, although critical services including residual (black bag) waste collections have been maintained, Local Authorities have had to temporarily reduce or suspend some waste or recycling services due to a combination of factors. These include high-levels of workforce shortages due to employees requiring to shield or isolate and operational changes to delivery methods to enable physical distancing. This has resulted in a need to prioritise the most essential services. In addition to the above factors, all Local Authority Household Waste Recycling Centres (HWRCs) have closed in order to discourage non-essential travel.

These have been necessary changes. The resilience and innovation within the sector has already allowed for the reinstatement of some suspended recycling services relatively quickly. However, we recognise that ongoing prioritisation will be required as local and national circumstances continue to change in the coming weeks and months.

This Scottish Government and COSLA guidance has been developed with input from Local Authorities, including waste managers and SOLACE, as well as the wider waste industry, Zero Waste Scotland (ZWS) and SEPA. Engagement will continue with Trades Unions regarding the safe operation of sites on an ongoing basis at both local and national level.

The guidance offers advice to Local Authorities on the considerations involved in reopening and operating HWRCs in the context of COVID-19. However, it is recognised that decisions on such matters also need to reflect local circumstances which Local Authorities are best placed to assess.

## Key principles

In addition to principles and duties enshrined in legislation (including application of the waste hierarchy), the following key principles take precedence and underpin this guidance:

### Protecting public health

Protecting public health should be a primary concern in all decisions. This applies to both decisions around prioritisation of waste streams and also in the way services are operated.

### Safe operation

The personal health, safety and wellbeing of those who provide waste services must be safeguarded by acting in accordance with relevant legislation and applying relevant published guidance. See also the Health and Safety section below.

### Fairness

Proper account should be taken of those living in disadvantaged circumstances or needing support and those residents with limited storage capacity at their dwellings.

### Maximising resources and minimising disruption

As those waste services that are currently suspended or reduced are restored, it is important that this done in light of available resources and that it does not occur at the expense of other key services. See the suggested [prioritisation of services](#) in annex A.

## Protecting the environment and supply of key materials

Recycling plays a key role in our move to a circular economy, benefitting:

- the environment, by cutting waste and carbon emissions
- the economy, by improving productivity, maintaining the supply of materials needed for key supply chains, and opening up new markets
- communities, by providing local employment opportunities and lower cost options to access the goods we need

Where possible, decisions should take into account the potential to maintain these benefits.

## Effective communications

Providing effective information and guidance to householders, the workforce and businesses to help them understand any temporary service changes, and what is being asked of them, particularly in terms of measures required to maintain public health and worker safety.

### Reopening Household Waste Recycling Centres (HWRCs)

#### Overview

As part of our work to transition towards a 'new normal', it is necessary to consider how HWRCs can be re-opened safely. This will require consideration of a range of factors to ensure that physical distancing is maintained, the public continue to be encouraged to make only essential journeys, and other key waste services are not negatively impacted.

It is important to recognise that reopening HWRCs may increase pressure on other waste services which are already stretched at this time and that further reprioritisation of services may be necessary.

Local Authorities have statutory obligations to provide waste collection and disposal services, including an obligation under section 1 of the Refuse Disposal (Amenity) Act 1978 to provide a site where household waste can be deposited. Recent announcements from the Scottish Government and COSLA acknowledge the work underway by Local Authorities to reopen HWRC sites from 1 June. This position may need to be re-visited should this be necessary in order to protect public health. The Coronavirus (COVID-19): framework for decision making outlines how we make decisions on reopening businesses and services.

#### Restrictions on movement

We are grateful to residents who have done all they can to reduce demand on waste services throughout this crisis by taking steps to minimise waste or by storing waste at home. These actions and decisions by Local Authorities to close HWRCs have undoubtedly reduced non-essential journeys and helped stop the spread of the virus.

There is, however, a limit to how much waste can be stored at home and households may be producing more waste than usual at this time. Additionally, some residents may not currently have access to some collection services.

COSLA has confirmed that all local councils are working towards the re-starting of some HWRC services on 1 June 2020 in line with the phasing outlined through [“Coronavirus \(COVID-19\): framework for decision making - Scotland's route map through and out of the crisis”](#). This is of course subject to change if the COVID-19 infection rate does not continue to improve. While Scottish Government advice will change so that there is no longer a restriction on the public travelling outside the home for the purpose of using a HWRC, this does not mean that all HWRCs will or should necessarily reopen. There are wider considerations, such as the ability to operate a site safely under the current circumstances, which may prevent some specific sites from reopening. Work is now underway in Local Authorities across the country to prepare for the re-opening of sites where appropriate.

## Health and safety requirements

HWRCs must be operated in a way that protects the health and safety of the public and staff. The measures required will vary depending on site-specific factors such as layout, location and the facilities available on-site. Detailed guidance [on COVID-19 and waste management activities](#) has been produced by the Waste Industry Safety and Health (WISH) Forum, providing advice on key issues including risk assessment, cleaning and hygiene, Personal Protective Equipment (PPE) and workforce management. The Health and Safety Executive has also issued guidance on working safely (links to which can be found at [further information - annex B](#)) and Health Protection Scotland has published [COVID-19 guidance for non-healthcare settings](#).

Local Authorities are updating their risk assessment for each site which includes consideration of:

- their duty to ensure physical distancing can be maintained in line with Health Protection Scotland and Scottish Government guidance on physical distancing ([further information - annex B](#)). The feasibility of maintaining physical distancing will depend to some extent on site-specific factors regarding layout and facilities.
- procedures for using facilities, ensuring such procedures are understood by staff and communicated to the public. This may include, for example, the introduction of new arrangements for limiting the number of vehicles allowed on-site.
- changes to the site plan in order to improve throughput.
- additional staffing requirements, including training needs, to manage both the site and queueing traffic.
- changes to the cleaning regime in line with relevant guidance including that issued by the WISH Forum ([further information - annex B](#)), particularly for surfaces that the public and staff are likely to come into contact with.
- PPE requirements in line with relevant guidance including that issued by the WISH Forum ([further information - annex B](#)).
- the availability of hygiene facilities, such as hand-washing facilities or hand-sanitisation stations, for staff in line with relevant guidance including that issued by the WISH Forum ([further information - annex B](#)).
- procedures for dealing with conflict and where individuals fail to adhere to physical distancing requirements.

## Operational considerations for reopening HWRCs

While decisions regarding the opening and operation of HWRCs are a matter for individual Local Authorities, it is recognised that a coordinated approach to reinstating services is important to manage public demand and avoid unintended consequences. Collaboration between Local Authorities is therefore encouraged, and a [checklist of suggested actions](#) is available in [annex C](#).

When preparing plans for the re-introduction of HWRCs, Local Authorities should also seek input and agreement on the plan from:

- site contractors/operators
- Police Scotland
- relevant roads authorities
- trades unions
- reprocessing and disposal facilities and
- other council services such as roads, street sweeping and enforcement officers.

Key considerations agreed by Local Authorities and Scottish Government include:

### **Which sites can be opened**

This will depend on several factors including the availability of resources, site location, the potential issues caused by queuing traffic, and the ability to operate the site safely for the public and staff. Sharing this information with neighbouring authorities will allow for better prediction of demand issues at sites close to authority boundaries.

### **Safe operation**

Sites should be operated in line with [Scottish Government guidance for business on physical distancing](#) and the principles outlined in the [Fair Work Statement](#) issued by Scottish Government and the Scottish Trades Union Congress. Police Scotland are also encouraging Local Authorities to contact their respective Local Policing Divisions to ensure that the local arrangements put in place are suitable. There is a range of guidance which may be useful to Local Authorities in considering this issue ([further information - annex B](#)) and collaboration across Local Authorities is encouraged to support the development of effective practice.

### **Safeguarding staff**

In addition to physical distancing measures and operational procedures to ensure staff safety (for example, steps to ensure good hygiene), measures may be necessary to ensure that staff wellbeing and mental health are protected and that staff are safeguarded from abuse. Additional procedures are also likely to be necessary to maintain staff safety where members of the public require assistance.

### **State of readiness of site and staff**

Local Authorities have established an achievable timeline of 1 June 2020 to resume operations at some sites, in line with the phasing outlined through "[Coronavirus \(COVID-19\): framework for decision making - Scotland's route map through and out of the crisis](#)". The intention is, so far as possible, to ensure a coordinated recovery across Scotland and a level of geographical coverage. This timeline has been established through consideration of factors such as site preparation, the need to reengage contractors, and additional training required to support safe operation of facilities.

### **The waste streams that will be accepted once the site reopens**

This could include identifying the types and likely quantities of materials that can be collected at each site given available resources and physical distancing guidelines. It may also be worth considering how and when this may develop over the medium to long term.

### **State of readiness of the supply chain**

Liaising with reprocessors/disposers will help to ensure that there is capacity and availability to collect and process the waste collected at HWRCs, particularly given the likelihood that sites will need to be cleared more regularly if there is an initial increase in demand.

### **Feasibility of actions to manage demand for services before HWRCs reopen**

This could include, for example, reinstating or increasing the frequency of bulky and green waste uplifts following appropriate risk assessment.

### **Actions to reduce demand for services after reopening**

This may include a communications plan, in line with key messaging detailed below and options to reduce journeys from outside of the Local Authority area to ensure the demand does not exceed the capacity of the site.

### **Traffic management**

The increased demand and reduced throughput capacity of HWRCs at this time could lead to traffic issues. To mitigate these issues Local Authorities may wish to liaise with Police Scotland to consider relevant and proportionate traffic management plans and any other mitigating actions.

### **Regular review of processes**

Embedding a commitment to review processes regularly within site plans is recommended. This could include a review of the restrictions in place on site and the material streams accepted.

### **Communications**

Clear communications will be vital in managing the demand for HWRC services and in ensuring services are accessed correctly.

While each Local Authority will have their own preferences for communicating with their residents, the following advice may be useful:

- all media channels, including websites, social media, and notices in local newspapers, should contain up-to-date information on HWRCs, including which sites are open, opening hours, and materials accepted and details of booking systems if applicable.
- messaging should clearly describe how physical distancing will be managed at HWRCs.
- signage at HWRCs should be updated with information on how physical distancing is maintained on site. Previous signage may need to be covered or temporarily removed to ensure messages are clearly communicated.
- Local Authorities should ensure that communications across all channels are unambiguous and consistent.

Local Authorities will need to tailor local communications and messaging to meet their needs, particularly around the opening times, waste streams accepted and how residents should use individual sites. For consistency of communication, a non-exhaustive list of messages that may be used as a starting point for communicating with residents is:

- not all HWRCs have reopened. For further information on your area and tips on how to manage waste, visit [managingourwaste.scot](http://managingourwaste.scot)
- please only take your waste to a HWRC if it cannot be stored safely at home. For information and tips on how to manage waste visit [managingourwaste.scot](http://managingourwaste.scot)
- HWRCs are operating differently now. Expect to queue before entering due to limits on how many people can be on site at any one time. Please stay in your vehicle while queuing to help protect public health. For information and tips on how to manage waste, visit [managingourwaste.scot](http://managingourwaste.scot)
- HWRCs are operating differently now - including opening hours and the types and volumes of materials being accepted. The order in which you load your vehicle is likely be important to ensure your visit is as efficient as possible. Please check the rules for your nearest reopened HWRC. For information and tips on how to manage waste, visit [managingourwaste.scot](http://managingourwaste.scot)
- if you or someone in your household is showing symptoms of coronavirus - stay at home and do not visit an HWRC. This is crucial as we work to protect public health. For tips on how to manage your waste, visit [managingourwaste.scot](http://managingourwaste.scot)
- please check with your local authority if garden, bulky, or other waste collections are available before visiting your nearest reopened HWRC. If available, make use of these collections instead. For tips on how to manage waste, visit [managingourwaste.scot](http://managingourwaste.scot).
- HWRCs are operating differently now and staff will not be able to assist you with carrying items. Please only visit your local HWRC where there is no other safe option for managing your waste and check the rules on attending beforehand. For information and tips on how to manage waste, visit [managingourwaste.scot](http://managingourwaste.scot).
- if you are a small business, please check the rules of your local reopened HWRC as some are currently only accepting household waste. For further information, visit [managingourwaste.scot](http://managingourwaste.scot).
- if you need to visit your nearest re-opened HWRC, you must always observe physical distancing. If you do not comply with this guidance, you will be asked to leave, and the site may have to close temporarily. You should only visit an HWRC within your local authority boundary, and you may be asked to provide proof of address before being allowed to enter the site.

The above messages will also be communicated through [managingourwaste.scot](http://managingourwaste.scot) as part of our national campaign to support householders in managing their waste.

## Future actions

The Scottish Government will continue to work closely with COSLA, Local Authorities and other partners to keep this guidance under review and consider what additional guidance and co-ordination will be necessary to support the waste sector throughout the COVID-19 pandemic.

## Waste service priorities (annex a)

Local Authorities are best placed to prioritise local services, taking account of available resources and their statutory responsibilities. We understand that circumstances will vary between Local

Authorities, and that some of the guidance on priorities and potential mitigating measures may not be appropriate for some areas.

Across Scotland, all Local Authorities already have in place business continuity plans which they are now implementing to adjust and prioritise key services. Ultimately, it is for Local Authorities to decide how they allocate resources to deliver key services, while meeting public health considerations and statutory requirements as well as ensuring the health, safety and wellbeing of the workforce. We continue to engage with the sector and will keep options under review as the situation develops.

The main message is that during the pandemic the overall continuity of proper municipal waste management services, including separate collection and recycling, is to be safeguarded in line with EU law. Adaptations to waste collection practices, in line with EU waste laws, are permitted but should be time and geographically limited, and proportionate to what is required to protect human health. The guidance specifies that in the case that waste collection services have to be reduced, the continuity and sufficient frequency of collections of residual waste and bio-waste should be ensured.

Where reprioritisation is necessary, the suggested order of priorities is:

## Residual waste

A reasonable frequency of residual waste collections to be maintained at all times.

## Other statutory collections and services

Local Authorities have other statutory duties to provide waste management services, including operating HWRCs under Section 1 of the Refuse Disposal (Amenity) Act 1978.

These statutory duties will continue to be prioritised using well-established business continuity planning arrangements, making all reasonable efforts to meet these statutory duties while adhering to COVID-19 guidance and ensuring the safety of staff and the public.

There is no specific order of priority within statutory recyclable material collections and this is for consideration at the local level, taking account of the principles outlined above. However, a route must be maintained for waste materials that would quickly become a public health hazard/nuisance if left uncollected.

## Non-statutory collections/services

As the name suggests, Local Authorities have greater flexibility to alter arrangements for non-statutory collections and services. Where possible Local Authorities will make all reasonable efforts to maintain or reinstate services and effective communication of changes and alternative storage or disposal instructions remains important.



## Further information (annex B)

This guidance recognises that individual Local Authorities are both responsible and best placed to make decisions regarding the operation of individual sites. In order to support Local Authorities in making these decisions various other guidance and resources are available, including:

### **Scottish Government**

- [Guidance on managing risks from coronavirus.](#)
- [Coronavirus \(COVID-19\): business and physical distancing guidance](#)
- [Coronavirus \(COVID-19\): prioritisation matrix for key workers to be tested](#)
- [Coronavirus \(COVID-19\): framework for decision making](#)

### **Health Protection Scotland**

- [COVID-19 guidance for non-healthcare settings](#)

### **COSLA**

- [COVID-19 for councils](#)

### **Waste Industry Safety and Health Forum (WISH)**

- [COVID-19 and waste management activities](#)
- [Managing health and safety at civic amenity sites](#)

### **Health and Safety Executive (HSE)**

- [Health and Safety Executive advice on collecting waste and recyclables](#)
- [Social distancing](#)
- [Personal Protective Equipment](#)
- [Working safely during the coronavirus outbreak](#)
- [Talking with your workers](#)

### **Zero Waste Scotland**

- [Managingourwaste.scot](#)
- [ZWS resource sharing platform](#)

### **SEPA**

- [The regulatory response to COVID-19](#)
- [Temporary regulatory position statement for reopening HWRCs](#)
- [Temporary regulatory position statement for temporary household waste collection points](#)

### **Wider industry guidance**

- [NAWDO: Coronavirus - Restarting Household Waste Recycling Centre Service](#)

### **European Commission**

- [Guidelines on waste management in the coronavirus crisis](#)

## Checklist of actions (annex C)

The following is intended to be a non-exhaustive checklist to ensure that the most important actions are taken to ensure the safe opening of HWRCs:

- draw together all information into a HWRC Recovery Plan
- record key decisions in a decision log
- plan, and implement where necessary, actions to reduce demand on HWRCs when they do reopen – e.g. increased frequency of bulky uplifts
- determine which sites it is feasible and safe to open with reference to guidance on physical distancing, the potential need for traffic management and the availability of resources

- engage with key partners for input into any recovery plan, including:
  - site contractors / operators
  - Police Scotland
  - trades unions
  - relevant roads authorities
  - reprocessing and disposal facilities
  - other Councils (particularly neighbouring councils), sharing details of which sites will be opened to help predict demand at individual sites
- determine feasible level of service provision including opening times and which waste streams will be collected from each site.
- notify SEPA of any changes to site operations outwith those specified in the temporary Regulatory position statement “Reopening Household Waste Recycling Centres” – <https://coronavirus.sepa.org.uk/media/1113/covid19-household-waste-recycling-centres.pdf>
- agree a traffic management plan with necessary partners, e.g. Police Scotland and land owners
- formulate and implement a local communications plan ensuring key messaging is in place