## 2. Resource London

# COVID-19 commercial waste adaptation 

## PHASE ONE: Considerations for London borough commercial waste services

Version 4.0, $9^{\text {th }}$ July 2020



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## Introduction

The waste sector, along with many others, has seen significant changes to the way it is required to operate as a result of COVID-I9 and the implemented lockdown. Commercial waste volumes have dropped significantly whilst household volumes have risen, resulting in many London boroughs having to alter their services. As lockdown eases there will be further implications for the waste industry, many of which are currently unknown. Commercial waste volumes are expected to slowly recover. However, as business sectors such as retail, hospitality and leisure re-open at different stages, waste volumes, waste composition and demand for collections will be in a state of flux. With staggered business opening, the expectation that many employees across London will continue to work from home, and the phased re-opening of schools, the shift of waste volumes from households back to commercial premises will be significantly slower than the reverse when lockdown was introduced. It is key for local authorities to determine a balance between commercial and residential services across resources, capacity and waste services.

## COVID-I9 adaptation project

LWARB are running a COVID-I9 adaptation project, split into two phases, to support commercial waste services run by London boroughs.

Phase one addresses the immediate impact COVID-19 is having on commercial waste services. It consists of this document which considers potential changes to day-to-day services and operations. A checklist has also been provided to aid officers when making service changes (Appendix I). It focuses on interim measures as the economy restarts and businesses reopen. It will be an iterative document and updated as and when changes occur until there is a sense of the 'new normal' and forecasting can be completed on the future of commercial waste in London.

Phase two will research how the commercial waste market in London might change as a result of COVID- I9, in terms of market and volume. Such as staggered opening times of different business sectors, changes in operations for businesses, or the impact of COVID-I9 on the private waste sector.

## Version updates

Updates for this version (v4.0) include:

- Government guidelines - updated
- I.I Operative absence levels - updated
- IO. Commercial waste composition
- Appendix 2 - updated


## Government guidelines

All retail businesses were allowed to re-open from Monday $15^{\text {th }}$ June, and sectors including hotels, restaurants, cafés, bars, pubs, cinemas, and hairdressers / barbers were allowed to re-open from Saturday $4^{\text {th }}$ July.

On Thursday 9th July it was announced that:

- From Saturday IIth July outdoor performances are allowed take place, for example music or theatre performances, and outdoor pools can re-open;
- Pilots are being undertaken to enable indoor performance venues to re-open as soon as possible;
- From Monday 13 ${ }^{\text {th }}$ July close-contact services such as beauticians, spas and tattooists are allowed to re-open; and
- From Saturday 25th July gyms, indoor swimming pools and leisure centres will be allowed to re-open.

The government has issued COVID-I9 secure guidance for a range of sectors including shops and branches ${ }^{1}$, restaurants, pubs, bars and takeaway services ${ }^{2}$, offices and contact centres ${ }^{3}$, hotels and guest accommodation ${ }^{4}$, the visitor economy ${ }^{5}$, close contact services ${ }^{6}$, the performing arts $^{7}$, and sport, gym and leisure facilities ${ }^{8}$.

The COVID-I9 secure guidance documents provide examples of where waste management practices need to be altered, or operational changes implemented that could result in a change to waste volumes including:

- "Providing more waste facilities and more frequent rubbish collection";
- If face coverings used by staff cannot be washed, they should be disposed of within "usual waste";
- "Setting clear use and cleaning guidance for toilets, with increased frequency of cleaning in line with usage. Use normal cleaning products, paying attention to frequently hand touched surfaces, and consider use of disposable cloths or paper roll to clean all hard surfaces";
- "Clearing workspaces and removing waste and belongings from the work area at the end of a shift, class, rehearsal or performance";
- "Ensuring that shared facilities like water points, waste points or washing up points are cleaned regularly";
- "Providing only disposable condiments or cleaning non-disposable condiment containers after each use";
- "Using disposable items where possible, for example nail files, and ensuring non-disposable items are cleaned between clients";
- "Encouraging workers to bring their own food and drinks. Not allowing food or drink to be consumed in the salon by clients other than water in disposable cups or bottles."
- "Using disposable paper towels in handwashing facilities where possible"

Social distancing guidelines have been amended to state that a distance of two metres should be complied with but, where this is not viable, a distance of one metre with risk mitigation is acceptable.

[^0]The government has stated that all measures in place are conditional and reversible, and local lockdowns, similar to the one in Leicester, will be implemented where there are spikes in infection rates.

## I. EXISTING RESOURCE AND CAPACITY

## I.I. Operative absence levels

A recent local authority survey ${ }^{9}$ indicates that staff absence levels remain relatively static. As of the week commencing $22^{\text {nd }}$ June, there was no impact on staffing levels for $25 \%$ of local authorities, whilst $70 \%$ of local authorities had less than a $20 \%$ reduction in staff, with just $5 \%$ of local authorities with staff reduction levels between $20 \%$ and $40 \%$.

It is important to note there are concerns in the waste industry that with the release of track and trace, staff absences may rise again, potentially to higher levels than when lockdown begun. This is due to the requirement on an individual to self-isolate if they have been in close contact with someone who has developed COVID-I9 symptoms, regardless of whether they have symptoms themselves. Even though testing is increasing, this may not assist with easing absence levels as individuals are required to self-isolate for 14 days after coming into contact with someone who has COVID-19, even if their own test result is negative ${ }^{10}$. The full impact of track and trace on staff absences is not yet known.

## I.2. Commercial vs. residential

When lockdown was introduced, the majority of businesses closed within a very short time period. As such, commercial waste volumes dropped, and household volumes increased rapidly. Lockdown will not be reversed at the same speed. This will mean business sectors opening in a gradual and staggered way, with retail and hospitality premises opening much quicker than offices. There will also not be a direct return to work for a lot of employees. It is expected that commercial waste volumes will begin to increase, and this may happen at a quicker rate than household volumes decrease. As such, a balance needs to be established to allow both commercial and residential services to operate effectively.

## I.3. Routing

As businesses open by sector, rather than location, consider whether you are able to operate commercial services efficiently using existing routes. The customers you have that are re-opening may be spread out across the borough - less density means lower efficiency. This is likely to be a more significant issue if commercial waste is not co-collected with residential waste. If routes are altered, these will need to be planned around existing collection days that customers have scheduled, otherwise collection days will need to be changed.

## I.4. Reduction or suspension of commercial services

If you identify challenges with capacity, are you able to sub-contract out collections of particular waste streams on a temporary basis? If you sub-contract to a total waste management provider,

[^1]ensure that you have appropriate contract clauses in place to reduce the risk of losing your customer to them. Alternatively, you can select a waste collector that specialises in individual waste streams, e.g. food waste. If sub-contracting is not possible, consider reducing your service offering (either by collection frequency or waste stream) in the first instance, with a suspension as a last resort. If you do not have the capacity to run full commercial services, think about whether capacity can be created by altering other services. As an example, if you operate a 'clear-all' policy can this be temporarily halted to free up space on vehicles?

- If a reduction or suspension of your commercial waste service is required, there are several further considerations to take into account:
- Check the terms and conditions that you have in place with customers - do they allow you to amend the service and, if so, to what extent?
- If you do have to reduce a customer's service and they request to cancel their contract as a result, will you allow them to do this with no notice period?
- If a customer's service is suspended, they will need to go to another provider to ensure their waste is collected - are you confident their business can be won back in the future?
- If you need to reduce the number of waste streams collected and, for example, have to collect all recycling as refuse - how will you manage this? This should only be considered as a last resort.
- Will you advise the customer of the change and ask them to place all waste into refuse containers or sacks? This will be a large communication challenge for what may be a short-term change. It also requires a behaviour change and so getting businesses to switch back to segregating recycling in the future may be a challenge.
- Will you ask customers to continue to segregate recycling but collect all waste streams on the same refuse vehicle? If customers see recycling and refuse collected together they may question this - how will you communicate the reasoning behind this temporary change?
- Will you charge customers accordingly, i.e. for all refuse rather than a split of refuse and recycling? This will determine who pays the additional disposal costs for the higher volumes of refuse.


## 2. CONTRACT AND PAYMENT FLEXIBILITY

## 2.I. Contract flexibility

In addition to offering suspensions and downgrades ${ }^{1 /}$ as businesses reduce or suspend trading, there may be a requirement for flexibility as they start to re-open. Businesses may be unable to gauge what levels of waste they will be producing if customer and/or employee numbers are reduced.

Flexibility should be offered to allow them to change their collections, both frequency and waste stream, in line with their waste volumes. If customers need increased flexibility consider switching their container service to a sack service where appropriate. This will enable them to just pay for the
waste they are producing. This change can be offered as an interim measure until their waste volumes stabilise.

Customers with container collections (where they have an agreed collection schedule) may also wish to change their collection days and times to fit with altered operating hours - how will you build these changes into your existing routes with minimal impact on the rest of the service?

## CASE STUDY: IMPLEMENTING A CHANGE REQUEST FORM

To avoid having to issue new contracts to customers who request to change their services, Westminster City Council have implemented a change request form. This captures a customers new collection requirements including: bin size, waste stream, bins per visit, visits per week and total lifts per week. Additionally, there is space on the form for customers to advise of any operational changes on site. Having a simple change request form allows customers to stay on their existing terms and conditions, for their original contract term. The form has been set up to be handled electronically, making it easy for customers to complete.

### 2.2. Payment flexibility

If you normally require businesses to purchase a minimum number of sacks per order or per year, could you offer a more flexible approach in the short term? As well as reduced waste volumes many businesses will be struggling with cash flow so may prefer to purchase fewer sacks more frequently, spreading the cost.

For customers on contracts, determine if there is any flexibility over payment schedules. For example, if you invoice annually can you delay any invoices that are due to go out in the next few months? Can you change annual invoices to quarterly ones to spread costs out for customers?

## 3. SALES

## 3.I. Retention vs. new business

Local authorities have primarily been focusing on customer retention during the initial lockdown period. With the financial hardships that are being faced by businesses, it is almost certain that some customers will unfortunately not reopen. Whilst customer retention is key, particularly for businesses who are struggling and need additional support, winning new business is also essential to make up these losses. As businesses begin to re-open new sales opportunities should be sought alongside retaining existing customers.

### 3.2. Discounts on existing services

Businesses will be looking for opportunities for financial savings - this is a chance to push recycling services as a way for them to reduce their overheads. Can you also offer discounts on certain services that it is also in your interest to incentivise, i.e. on materials that have a good, or improving, sale price (Appendix 2). This will assist with retaining existing customers and obtaining new ones.

### 3.3. New service offerings

With businesses re-opening slowly, changing their operating models, and looking to save money with increased recycling, this is an opportunity to introduce new recycling services. For example, can you piggy-back on residential collections of food waste and begin offering commercial food waste collections? Any new services do not have to be offered to all customers immediately, or even be widely promoted, but in the first instance to those businesses who could benefit most. The service can then be grown organically in line with available capacity.

### 3.4. Sales officers

A significant element of new business across most local authorities is won by sales officers going door-to-door. Customer retention is often completed by sales officers popping in to visit customers, and check they are happy with the service, on a regular basis. In complying with social distancing, it will be harder for sales officers to operate in this way, and businesses may prefer to avoid face to face contact (in particular non-customer facing ones).

Sales officers should place focus on other contact methods, such as phone and email, to keep in touch with current customers. There is a benefit to sales officers still spending time out in the borough however, to enable them to be aware of the businesses that are re-opening (both existing customers and those that use private waste companies). Additionally, where private waste companies are used, sales officers may be able to gauge where collections have not been taking place, creating a sales opportunity.

Existing customers should be contacted by phone to check if they are happy with their current service provision, or whether any changes are required - reminding them of any contract flexibility, promotions and new services that are on offer. Any potential new sales opportunities should be contacted, emphasising the reliability of the service and flexibility the council has been able to offer its customers during lockdown.

## 4. COLLECTIONS

## 4.I. Internal collections

Consider what changes will be made to your operational procedures when collecting from inside a customer premises. Will operatives have masks as a standard? If not, will you provide them if a customer requests they are worn within their building? Where collections are made from loading bays, these are often limited in space and can be very busy environments. Will operatives be able to comply with social distancing requirements if there are other people present (either employees of the business or other suppliers)? Speak with customers where this is not possible to re-arrange collection times for quieter periods. This may require some re-routing of your commercial rounds. Implement an easy report-back and monitoring system for operatives to raise any social distancing or COVID-19 concerns from any customer locations.

### 4.2. On-street collections

Consideration should be given to any changes required to on-street collections, predominantly sack collections. Crews will have to navigate pedestrians to comply with social distancing. As businesses re-open and lockdown restrictions ease, but travel by public transport remains inadvisable, it is likely there will be an increase in the number of pedestrians and cyclists - both on pavements and in the street. Crews should be made aware of the higher presence of pedestrians both in terms of vehicle movements and when collecting sacks. Crews should expect that pedestrians will likely get in their way when performing on-street collections, and should be advised on how to engage with them appropriately.

### 4.3. Co-collection reporting

For local authorities that co-collect commercial and residential waste, there is a requirement to report on the split. Some boroughs will do this based on monthly or quarterly sales - assigning an average volume to each product to estimate what was sold, and therefore what was collected as
commercial waste. However, several boroughs use a set figure each quarter as their apportionment split. If this is the case, this figure should be altered to reflect both the decrease in commercial waste and the increase in residential waste. This will help to ensure accurate waste data is provided, and could save your commercial waste service costs, as disposal for commercial waste can often be higher than disposal for residential waste.

## 5. CONTAMINATION

## 5.I. PPE contaminating recycling

Many household services have reported recycling collections as being contaminated with PPE. It is likely that the same will be seen for commercial waste services. Consider how you will effectively communicate to your business customers (those in non-health care settings where PPE will be a new waste stream) that PPE should be disposed of as refuse.

### 5.2. Contamination process

Within several local authorities, crews will clear items of contamination from containers if it is easily accessible. If there is a hygiene risk of them touching PPE that has been incorrectly disposed of, this process may need to be temporarily halted.

## 6. COVID-I9 INFECTED WASTE

There should be minimal volumes of COVID-19 infected waste being produced by businesses (with the exception of healthcare settings) due to the requirement for self-isolation. However, if an employee becomes ill whilst at work with symptoms of COVID-I9, any waste produced by them should be double bagged and stored for 72 hours before being placed out for collection. This message should be clearly communicated to all businesses as they re-open.

## 7. FLY-TIPPING AND ENFORCEMENT

## 7.I. Businesses with private waste contracts

There may be some businesses who have services with private waste companies that are unable to perform collections - but the waste may still be presented on-street by the business. There is an additional sales opportunity here with these businesses.

### 7.2. Financial pressures

As businesses re-open and face financial pressures, they could look to save money by purchasing fewer, or no waste sacks. Presenting waste instead in black bags, which may be easier to conceal among higher volumes of residential waste sacks. Businesses may also take their waste home, if volumes are low. Ensure you communicate clearly to your customers the financial impact of them not having a commercial waste service, and that it could end up costing them more.

### 7.3. Communication and enforcement

The enforcement team should be engaged to ensure that businesses are still compliant. Both the enforcement and waste teams should increase education on duty of care.

## 8. COMMUNICATIONS

Ensure all businesses (not just existing customers) know that you are still operating your services, that they have flexibility with their service and collections, and ask them whether there is anything else you can support them with at this time.

Clearly communicate the financial savings that can be obtained by recycling, ensuring that customers are also educated on what can and cannot be recycled, as well as any contamination policy you have in place. Communicate the financial risk to businesses if they do not comply with duty of care.

Be clear about how new waste materials should be handled, such as PPE and waste that is potentially infected with COVID- I9, and the impact that they could have if they are put into recycling. Consider using messaging around the end-to-end impact, for example staff at MRFs having to remove PPE from recycling.

## 9. FINANCIAL ANALYSIS AND FORECAST

Either through your sales officers, or the contract / order processing team, stay alert to any businesses that are closing down. If you have allowed flexibility of payments, and delayed issuing invoices, there is a potential for non-payment from business who close down or go into administration.

Even though local authorities are experiencing a loss of revenue due to businesses downgrading or suspending services, these losses should be looked at alongside reduced operating costs. As an example, commercial waste disposal costs will be lower as a result of lower collection volumes. Depending on how the waste service is resourced, if commercial staff have been re-deployed to support other council areas these staff costs are not currently allocated to the commercial waste service. Even though the majority of local authority commercial waste services work towards revenue targets, at this time consideration should be given to the cost of the service as a whole which is more reflective.

## IO. COMMERCIAL WASTE COMPOSITION

With social distancing, and certain elements of lockdown still in place, there will be changes to commercial waste as businesses re-open. This will be seen in waste volumes, material streams, material composition, and recycling quality. Examples where changes may be seen include:

- Office environments - working from home is likely to remain in place for large numbers of employees for the foreseeable future meaning reduced waste volumes from these premises. This could impact overall recycling quality as office environments can be a good source of clean recycling in large volumes.
- Hospitality businesses - as food businesses transition from 'eat-in' to 'take-away' to allow reopening, the food waste arising from them will alter - with only preparation waste being produced. Plate waste will move with the customers to wherever they eat from (either a different business premises or on-street bins). Despite social distancing requirements still being in place which will create reduced capacity, the Eat Out to Help Out scheme ${ }^{12}$ may lead to an increase in customer demand. As such food waste volumes from hospitality businesses that sell food for "immediate on-premises consumption" may begin to increase.
- Hairdressers / barbers - these businesses typically produce very small volumes of commercial waste however they are classed as a 'close contact service' and so will likely see an increase in the amount of disposable equipment in their waste.
Further research will be completed on commercial waste composition in phase two of this project.


## II. FURTHER SUPPORT

LWARB will continue to provide COVID-I9 support to London boroughs through this document and the phase two research. LWARB can also help with BAU advice and support, for example with commercial communications or introducing new commercial waste collection services. Get in touch with us to find out more.

[^2]
## 12. APPENDICES

## I2.I. Appendix I

Commercial waste service - COVID-I9 adaptation checklist

| ACTION | COMPLETE |
| :---: | :---: |
| Existing resource and capacity |  |
| Monitor staff absence levels, across the whole waste service, not just commercial, as track and trace develops |  |
| Review waste volumes across the whole service, not just commercial, monitoring how commercial waste volumes are increasing and any decreases to household waste |  |
| Review the efficiency of your routes as businesses open at different times across the borough |  |
| Contract and payment flexibility |  |
| Establish a process to allow customers the option to downgrade or suspend services |  |
| Offer flexibility to customers enabling them to change both the waste stream they have collected and the frequency of collections |  |
| Set up a change request form to avoid having to amend full contracts and terms |  |
| Establish a process to allow customers to switch from a container service to a sack one as an interim measure |  |
| Consider whether you are able to change collection times for container customers if their operating times and/or days change |  |
| Offer to change the minimum order for sack services if you have one, considering that many customers will produce less waste and may have reduced cash flow |  |
| Review whether you can offer payment flexibility for invoiced customers such as delaying invoices or changing payment frequency |  |
| Sales |  |
| Promote recycling services as a way for businesses to reduce overheads |  |
| Review the potential to offer discounts on certain services, particularly those that have a strong sale price |  |
| Review recycling services that are not currently offered and determine if there is any opportunity to introduce these as a way to help businesses reduce costs |  |
| Set up processes to allow sales officers to use contact methods other than face-to-face such as phone and email |  |
| Ensure sales officers still spend time out in the borough to be aware of businesses that re-open (both customers and non-customers) to allow for follow up service and sales calls |  |
| Contact existing customers by phone to check they are happy with their current service provision, reminding them of any contract flexibility, promotions and new services that are on offer |  |
| Contact all potential new sales opportunities, emphasising the reliability of the service and flexibility the council has offered its customers during lockdown |  |

## Collections

Determine what changes need to be made when operatives collect from inside a customer premises to ensure social distancing can be complied with

If operatives will not be issued PPE (e.g. masks) as standard, speak with customers to ensure this meets their own operating criteria

If operatives cannot comply with social distancing requirements when collecting from inside a customer premises, speak with the customer to arrange collections at a quieter time

Implement an easy report-back and monitoring system for operatives to raise any social distancing or COVID-I9 concerns from any customer locations

Make crews aware of the higher presence of pedestrians in terms of both vehicle movement and when collecting sacks

If you co-collect and calculate your commercial-domestic apportionment using a set figure each quarter, consider revising this to ensure your calculations reflect the drop in commercial waste and increase in domestic waste

Contamination
Communicate clearly to businesses that disposable PPE cannot be recycled

If your crews clear easy-to-remove contamination from containers, review this policy in light of handling waste that may be PPE or COVID-19 infected

## COVID-19 infected waste

Deliver clear messaging to all businesses as they re-open that the waste of any employee that becomes ill with COVID-I9 symptoms should be double bagged and stored for 72 hours before being placed out for collection

## Fly-tipping and enforcement

Take up sales opportunities where private waste companies have been unable to perform collections but waste is still being presented

Ensure businesses understand the financial impact of not having a commercial waste service in place

Increase education on duty of care through both enforcement and sales officers
Engage your enforcement team to ensure businesses are still compliant

## Communications

| Communicate to all businesses that your services are still operating and they have flexibility |  |
| :--- | :--- |
| Communicate the financial savings that can be obtained by recycling, educating them on what can and cannot |  |
| be recycled and your contamination policy |  |
| Communicate to businesses the financial risk if they do not comply with duty of care |  |
| Communicate how new waste materials should be handled (including PPE and waste that may be infected |  |
| with COVID-19) |  |

## Financial analysis and forecast

Stay alert to any businesses that are closing down to reduce the potential risk for non-payment
Review any service losses as a whole, considering reduced operating or disposal costs

### 12.2. Appendix 2

Prices per tonne as of $9^{\text {th }}$ July - www.letsrecycle.com/prices/

| PAPER / CARD | Feb | Mar | Apr | May | Jun |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Mixed papers | $-10-0$ | -15--3 | -5-25 | $10-35$ | $5-20$ |
| Old KLS (cardboard) | 15-28 | 15-35 | 35-75 | 60-110 | 45-75 |
| News and pams | $32-42$ | 30-40 | 40-65 | 50-65 | 50-60 |
| Over-issue news | $45-50$ | 40-50 | 50-90 | 70-90 | 70-85 |
| Sorted office waste | $128-134$ | $122-128$ | $137-162$ | $170-190$ | $155-175$ |
| Multigrade | $120-130$ | $111-115$ | III- 150 | $160-180$ | $160-175$ |
| Light letter | $150-155$ | $145-148$ | $150-180$ | 190-200 | $180-190$ |
| White letter | $175-185$ | $175-185$ | 190-225 | 215-225 | 215-225 |
| GLASS | Feb | Mar | Apr | May | Jun |
| Mixed | $5-12$ | $5-13$ | $7-15$ | 7-17 | 6-15 |
| MRF glass | -27-3 | -24-3 | -20-3 | $-20-3$ | -25-3 |
| ORGANICS | Feb | Mar | Apr | May | Jun |
| IVC | $-24--50$ | $-24--50$ | -24--48 | $-25--45$ | -25--45 |
| AD | 4--25 | 4--25 | 5--25 | 5--25 | $5--25$ |
| PLASTIC | Feb | Mar | Apr | May | Jun |
| Clear and light blue PET | 270-320 | 270-320 | 260-320 | 250-310 | 200-270 |
| Coloured PET | 60-85 | 60-85 | 20-60 | 20-60 | $10-20$ |
| HDPE natural | 550-610 | 570-620 | 530-580 | 530-570 | 440-500 |
| HDPE mixed colour | $180-220$ | $190-230$ | $170-220$ | $170-210$ | 100-140 |
| Mixed bottles | $110-170$ | $140-180$ | $120-170$ | $110-160$ | $50-110$ |
| Pots, tubs, trays | - | - | - | $40-80$ | $10-40$ |
| METAL | Feb | Mar | Apr | May | Jun |
| Steel cans | 70-80 | 35-65 | $35-60$ | 60-75 | 75-90 |
| Aluminium cans | 720-750 | 700-750 | 640-690 | 620-660 | 650-710 |
| EfW | Feb | Mar | Apr | May | Jun |
| EfW | $88-115$ | $85-115$ | $75-105$ | $77-105$ | $82-105$ |




[^0]:    I https://assets.publishing.service.gov.uk/media/5eb9703de90e07082fa57ce0/working-safely-during-covid-19-shops-branches-vI.I-250520.pdf
    2 https://assets.publishing.service.gov.uk/media/5eb96e8e86650c278b077616/Keeping-workers-and-customers-safe-during-covid- 19 -restaurants-pubs-bars-
    takeaways-230620.pdf
    ${ }^{3}$ https://assets.publishing.service.gov.uk/media/5eb97e7686650c278d4496ea/working-safely-during-covid-I9-offices-contact-centres-140620.pdf
    $4 \mathrm{https}: / / \mathrm{www} . g o \mathrm{v} . \mathrm{uk} / \mathrm{guidance} / \mathrm{working}$-safely-during-coronavirus-covid-19/hotels-and-other-guest-accommodation
    ${ }^{5}$ https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/the-visitor-economy
    ${ }^{6}$ https://assets.publishing.service.gov.uk/media/5ef2889986650cl2970e9b57/Keeping-workers-and-clients-safe-during-covid-19-close-contact-services230620.pdf

    7 https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/performing-arts
    ${ }^{8}$ https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/providers-of-grassroots-sport-and-gym-leisure-facilities

[^1]:    9 Led by ADEPT, LARAC, NAWDO and LGA
    10 https://www.nhs.uk/conditions/coronavirus-covid-19/testing-and-tracing/nhs-test-and-trace-if-youve-been-in-contact-with-a-person-who-has-coronavirus/

[^2]:    $12 \mathrm{https}: / / \mathrm{www} . g o v . u k / g o v e r n m e n t / p u b l i c a t i o n s / g e t-m o r e-i n f o r m a t i o n-a b o u t-t h e-e a t-o u t-t o-h e l p-o u t-s c h e m e / g e t-m o r e-i n f o r m a t i o n-a b o u t-t h e-e a t-o u t-t o-h e l p-~$ out-scheme

