

SUBJECT:	PAPER AND CARD RECYCLING OPTIONS
DIRECTORATE:	COMMUNITIES AND ENVIRONMENT
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1. Purpose of Report

- 1.1 To make Members aware of both the request by Lincolnshire County Council for the City Council to adopt separate paper and card recycling, in full or part, and the recent government mandate under it's 'Simpler Recycling' initiative, to collect paper and card separately as a statutory requirement.
- 1.2 To set out the implications of change, in full or part.
- 1.3 To provide options for consideration.
- 1.4 To show the proposed officer recommendation to Executive, with rationale.

2. Executive Summary

- 2.1 There is a corporate desire to minimise 'contamination', and maximise recycling, but a recognition that 'contamination' is largely defined by the Waste Disposal Authority, Lincolnshire County Council (WDA). As a result the WDA have significant control over a Waste Collection Authority's (WCA) published recycling rate, which in turn affects Lincolnshire's collective overall recycling rate.
- 2.2 In Lincolnshire paper and card broadly makes up around half of the recycling waste stream, and so the WDA have asked all WCAs to implement a separate paper and card collection, collected alternately to the mixed domestic recycle, in a bid to see reduced reported 'contamination'.
- 2.3 The recent government announcement under 'Simpler Recycling' also mandates this, but recognising there are limitations, it also provides opportunity for authorities to be pragmatic and to be exempt from this if they can show there are Technical Economic Environmental or Practical reasons not to implement this change (TEEP).
- 2.4 There are a number of issues that have a bearing on how realistic bringing in a service change at this time would be, and which consequently have impact on our TEEP assessment. Examples are such as the impact of preparing for new contract implementation, the impending mandate for a new mandated food waste collection service, the advent of Extended Producer Responsibility costs on packaging producers, and known issues relating to bins left out on streets.

- 2.5 Factoring in all issues, the TEEP assessment for Lincoln suggests that, given the range of other pressures on this service area, and indeed residents, changes to introduce paper and card collections at this time would not be wise. This report therefore recommends deferring a decision on implementation until at least 2027.
- 2.6 Noting that such a delay would not help to improve 'contamination' or recycling rates, it further suggests that, provided the WDA does not re-define what constitutes acceptable recyclable material and supports increased general efforts to reduce contamination, then an education/enforcement programme, to change recycling habits and reduce contamination levels voluntarily should be tried, before an extra paper and card collection is considered again.
- 2.7 It is recognised that in order to drive change, alongside education, ultimately it might be necessary to use formal enforcement action where a household refuses to comply with recycling sortation requirements.

3. Background

- 3.1 The management of municipal household waste in Lincoln requires co-operation between the City Council as the 'Collection Authority' (WCA), and the County Council as the 'Disposal Authority' (WDA). These are designated legal terms.
- 3.2 As the respective names imply, the WCA has responsibilities for collecting waste/recycling, whereas the WDA has responsibilities for managing its disposal/processing.
- 3.3 Across Lincolnshire, authorities cooperate strategically on how waste flows are managed through the auspices of the Lincolnshire Waste Partnership (LWP). This is a body with Member representation, and the Portfolio Holder for Remarkable Place is the City Council's representative.
- 3.4 The LWP monitors key performance data, including recycling and disposal rates, with the aim of developing practical proposals for change to deliver performance improvements.
- 3.5 A 'Waste Strategy for Lincolnshire' was adopted in 2019, to which the City Council is a signatory, and it sets out the LWP's vision as being "To seek the best environmental option to provide innovative, customer friendly waste management solutions that give value for money to Lincolnshire".
- 3.6 The LWP agreed 10 Objectives, several of which are directly relevant for consideration in the context of this proposal:

Objective 1. Improve the quality and therefore commercial value of our recycling stream.

Objective 5. Contribute to the UK recycling targets of 65% by 2035

Objective 10. To consider appropriate innovative solutions in the delivery of our waste management services

- 3.7 Progression of these aims is also within the context of a constantly changing operating environment, where not only technological changes take place, but also environmental, legal, and financial factors change, as well as market practices/opportunities.
- 3.8 A number of factors in the current operating environment are especially pertinent in considering this as a potential change to service. Not only is there a renewed emphasis amongst the public on recycling generally, but the County Council recycling / disposal contract has seen a cost increase for the disposal of 'contamination'. Despite best efforts through aligned education/promotion, Lincolnshire's 'contamination' rates have remained high, creeping into the area of 20 to 30% at times, so positive action has been, and still is, required. Lincoln's own rate exceeds 15% overall at times, with certain areas of the city showing nearer to 30%. Districts who have implemented separate paper and card collections are seen to have much lower rates.
- 3.9 In simplified terms 'contamination' is anything that, by the terms of the County Council's recycling / disposal contract, is not a 'target material'. That is to say, anything that is collected that is not on the list of designated recyclable materials that the County Council wishes to (or has to by law) recycle.
- 3.10 Most materials can be 'recycled' in some form, but as there are a wide range of materials in a mixed waste stream, some of which are composite, recycling everything would be a complicated task, and consequently expensive. There are many reasons why a material may be deemed to be 'contamination'.
- 3.11 The list of acceptable materials has changed in the past and will change in the future in response to legislative requirements and the commercial markets' ability to recycle economically, the desire to maximise what can be recycled, and the wish to keep authorities aligned in what they will take as recycling across the county and/or country.
- 3.12 It is important to note here that even where a material is identified as 'contamination' it may still be pelletised as a fuel source or go to the Energy From Waste plant to be turned into electricity. Landfill is only ever used as an absolute last resort by the WDA for any materials, which translated into a landfill figure of less than 1% last year.
- 3.13 In recognising both the increasing cost of disposing of 'contaminated' materials and the improving market for good quality recyclate, the County Council has been promoting a move to collecting paper and card in a separate bin to other recycling materials.
- 3.14 The effect of instigating a separate paper and card collection, if enacted, would be twofold:
- A focus on recycling materials, and keeping paper away from other materials, means less cross contamination.
 - It moves the material from being a commodity that carries a cost to process, to one that can attract an income (saving/income to the County Council as owners of the materials once collected).

3.15 At the start of December the government announced that, accepting the broad benefits of separate paper and card collections, it was mandating the introduction of such collections from 1st April 2026, alongside the introduction of the new weekly food waste collections.

3.16 However, the recent government announcement under its 'Simpler Recycling' initiative provides opportunity for authorities to be pragmatic and to be exempt from this provided they can show there are Technical, Economic, Environmental, or Practical reasons not to implement this change (TEEP).

4. A word on recycling rates.

4.1 It is important to note that 'contamination' rates and recycling rates are not the same thing. As this proposal means asking residents to split the recycling materials that they are already collecting in one bin into two separate bins, in strict tonnage terms, it simply means handling the same materials that would already have been collected differently. Ergo, it is the same material, and so there should be no change to the recycle rate, just a change in quality as the paper and card would be cleaner.

4.2 The lower grade material collected in the existing mixed system (paper and card mixed with other materials) although still used in low grade recycling options is none the less still recycled, but it is still reported as 'contamination' to represent the lower grade of material as dirty card/paper is not a 'target material' for the WDA contract.

4.3 If separate paper and card collection were to be introduced city wide, reported recycling rates would not therefore necessarily be affected directly or significantly. Although it is possible there might be a little improvement by virtue of the publicity/focus on the issue. Reported average contamination levels would reduce though, dropping by an estimated 5 to 8 percentage points (from around 15% to about 7%).

5. Trials and roll-out

5.1 Recognising the above potential benefits, the County Council undertook a set of trials with some districts, whereby separated paper and card collections were trialled in selected areas of Boston (2969 households), NKDC (1781) and SHDC (2408). The SHDC trial was on a different collection system, using bags, and ultimately was stopped because the bags could not be split and separated effectively.

5.2 The trials in Boston and NKDC were in areas where they had alternate weekly 240L wheeled bin collections in place. (This means that Mixed Domestic Recyclate -MDR- material is collected one week, with household waste in another bin the next week). The trial alternated the MDR collections with paper and card collections, so that MDR was taken four weekly and paper and card was taken alternately with that. This is referred to nationally as a 'twin stream' collection system.

5.3 Since the trials concluded, the twin stream system has been rolled-out across Boston, NKDC, ELDC, WLDC and in 2024 , SKDC.

- 5.4 An analysis of Lincoln's waste suggests that paper and card make up about 50% of the recycling waste stream by volume, mirroring that of the other districts. As this is in the order of half of the capacity available, and as most bins are presented with the potential for a little spare capacity subject to good bin management (better packing/flattening etc.), it suggests that twin stream collections might be viable in Lincoln, at least in theory in terms of capacity. The findings of the trial have been used to identify the effects, as set out in 4.3 above.
- 5.5 There are however other important issues that require consideration. These are set out in more detail in the main body of the report.

6. Assessing the request and developing a TEEP assessment.

- 6.1 LCC have previously requested, via LWP, that the City Council adopt the standard twin stream model used by those other districts in the county that have adopted paper and card collections so far. This is of course now compatible with the new government mandate. It is important and relevant to note that Lincoln's collections are rather different in some ways to the systems used in these other more rural areas. In Lincoln about two thirds of Lincoln's properties have 240L wheeled bins (30,250 properties), with about a fifth on 140L bins due to bin storage space restrictions for the bins (9,160 properties). A much smaller but still significant number are on bag collections (880) due to either storage or access restrictions, and some are asked to use communal bins (6,780) due to access issues.
- 6.2 The recent government announcement to mandate paper and card collections, unless a good case can be found not to do so, means that a TEEP assessment has been appropriate to assess viability. The TEEP assessment officers have completed has taken into consideration several key factors:
- a) That many properties in Lincoln would struggle to accommodate an extra bin/s.
 - b) Food waste collections are now mandated to be in place for every residence in Lincoln from April 2026, so more bins will have to be provided and there is a need for extensive planning and preparations to be put in place.
 - c) The Extended Producer Responsibility regulations (EPR) mean that the volumes of packaging in the waste stream are expected to reduce significantly as packaging producers will be taxed on their use.
 - d) The Council's Community Services team have to mobilise some of the council's largest contracts (waste, cleansing and grounds maintenance services) under completely new contract terms and systems, on a strict timetable by September 2026
- 6.3 To ensure that the TEEP assessment is robust, it has taken into consideration the above in the context of three separate types of property/collection:
- a) Properties served by 140L wheeled bins or bags
 - b) Properties served by 240L wheeled bins
 - c) Properties served by communal collection systems.

- 6.4 A summary of the outcome of the assessment is that whilst some areas, particularly some of the areas served by 240L bins, could potentially accommodate a paper and card collection, there are good reasons not to do this at this time.
- 6.5 Additionally, not only can we not be certain what the packaging regulations impact will be on the volumes of packaging that will be in the domestic waste stream in the next few years, but also adding extra bins at a time when bins left out on streets is a significant enforcement issue, would risk enflaming a particular problem. Aside from that, the workload of planning the new contracts' implementation, whilst also adding a new food waste service would overstretch resources and add an unnecessary risk for the delivery of services. Services that currently enjoy a very high level of satisfaction.
- 6.6 Based on the TEEP assessment, there is a clear recommendation to delay consideration of implementation. This will therefore be the recommendation to Executive. Critically it should be noted that not having a separate bin does not stop paper and card being recycled. It is still recycled just as lower grade material.
- 6.7 However, delaying the decision, does not mean doing nothing in relation to the issue of 'contamination', and whilst this committee can of course comment on the recommendation, it is also invited specifically to make comment on a further proposal which will be recommended to the Executive; to engage with LCC and undertake a renewed concerted education and enforcement campaign.
- 6.8 The options that have been considered for context in developing the TEEP are:
- 1) Not to introduce paper and card collections at this time.
 - 2) Introduce paper and card collections in 240L areas only.
 - 3) Introduce paper and card collections in all areas (except areas without wheeled bins e.g. bags collections, those with communal bins).
 - 4) To work with LCC on 'contamination' reduction, through increased education and enforcement.
- 6.9 **Option 1** Not to introduce paper and card collections at this time.
- 6.10 The Council's waste services are operating as they have for some years now. They are therefore stable in terms of service provision, and satisfaction with the reliability of recycling services is high (95.1% fairly or very satisfied as at Jan. 2025).
- 6.11 However, whilst the existing service offers reliability of collections (97% reliability satisfaction as of Jan. 2025), it is not achieving aspirations to reduce contamination rates or improve recycling rates, and so a change of some nature will be required at some point. A footnote to this is that the newly mandated food waste service may have an impact of its own on contamination levels by taking a 'dirty' substance out of the MDR. It shouldn't get into the recycle as a contaminant, but the contamination rates suggest it does at times as some recyclers are not sufficiently diligent.

- 6.12 The existing City Council contract for waste /recycling services runs until Sept 2026. Although we now know that Biffa have been awarded the next contract, any changes in advance of that would have to be negotiated with Biffa. The extent of any financial impact from this is subject to them being able to demonstrate justifiable costs. It is noted that many aspects of twin stream collections do not impose extra costs (it is the same number of bin lifts overall), but as not all of Lincoln is on 240L bins, and collection rounds are mixed in a few cases, there are some additional costs that could not be avoided.
- 6.13 It is important to remember for context that the Environment Act has recently added another level of complexity to how the Council may plan service changes. The Council is also being mandated to introduce food waste collections for every residence by April 2026, which represents a significant challenge in itself, detracting from the staff resources available for this work.
- 6.14 All of the above means that whilst the 'Not to intriduce at this time' option might not be desirable in terms of aspirations for reducing contamination, it would reduce pressures on the services in a period when other changes are also being managed i.e. The transition to a new contract process, and planning for food waste collections to every residence in the city. There is a very real risk that satisfaction rates will be impacted by the changes anyway, but adding another change that is not mandated would add a further unnecessary pressure/risk to satisfaction.
- 6.15 **Option 2. 240L areas only**
- 6.16 This model is based on making changes at properties with 240L wheeled bins only, which is approximately two thirds of the city. At each property another 240L bin would be provided. The new bin would be designated the colour purple, as this is not a colour in use in any district to denote anything else, and is commercially available. The preference is for black bins with purple lids, as has been used at all other council's who have adopted separate collections in Lincolnshire. This bin would be explicitly for dry paper and card only.
- 6.17 Collections of separated paper and card would alternate with that of the mixed recycle (MDR). So, based on the standard 240L wheeled bin model, a household would get one collection each week, on a rotation : Domestic waste / Mixed recycle / Domestic waste / Separated paper and card – the sequence then repeats.
- 6.18 In this way mixed general domestic waste is still taken fortnightly, but the dry recycle is split. No extra waste is generated, and the resident has no more or less capacity; they are just required to separate the paper and card into another bin and ensure it is presented on the right day.
- 6.19 It is recognised that although 240L bin residents were initially given this size of bin because they had more space. Evidence suggests however that some with 240L bins may still have problems storing yet another wheeled bin as the city already has a number of areas where 240L bins left out on the street all week is an issue. So all properties would have to be subject to individual assessment.

- 6.20 **Option 3** To do this in all areas (except areas without wheeled bins e.g. bag collections, those with communal bins).
- 6.21 Under this option the vast majority of the city (all those with 140L or 240L bins) would be included. All would be given a purple lidded bin (as above) but it would be equal to the size already given for other services (140L or 240L).
- 6.22 Historically about one fifth of the city have been given the smaller 140L bins in recognition of the restrictions on the storage space that they have.
- 6.23 The 140L areas operate with a different collection frequency to 240L areas, mindful that they have less capacity in each bin. The adjusted collection frequencies are intended to make the services more equitable, regardless of where a resident lives, be it in a 140L or 240L area.
- 6.24 In 140L areas the general waste (black bin) is taken weekly, with the recycling (brown bin) taken fortnightly.
The introduction of a purple lidded bin for cardboard would necessitate the service alternating the collection of MDR and paper and card, and still being weekly for general waste.
- 6.25 140L areas will, by virtue of them being put on this system in recognition of them having less storage space, have greater difficulty accommodating any extra bins. Again in a number of 140L areas there is a problem of bins left on streets all week.
- 6.26 **Option 4.** To work with LCC on 'contamination' reduction, through increased education and enforcement. This would be in advance of reconsideration of separate paper and card collections at a future date.
- 6.27 Noting that as significant parts of the city will have problems storing another wheeled bin, and that the intention of the twin stream system is principally to reduce 'contamination', this is an option that gives Members an alternative to no change.
- 6.28 Based on working with LCC colleagues, this option envisages an education and enforcement package being delivered, giving people more information first, but if they refuse to adjust habits to clean-up their waste, then increasing the strength of action by way of enforcing. This might be refusal to collect waste until correctly sorted, or ultimately, formal enforcement action if a household refuses to use their bins correctly.
- 7. The positive and negative impacts for each option.**
- 7.1 The following are general comments applicable to any area where a twin stream system is installed.
- 7.2 It should be noted that learning from the trial and roll-out at other councils has shown that whilst there is considerable support for the general principles of recycling, the introductions have not been without problems.

- 7.3 Problems have usually been about bin storage space, perceived loss of disposal capacity, or the enforcement/rejection of contaminated bins.
- 7.4 Extensive education/information is required in advance and at introduction, and strict enforcement is also required for the minority who simply refuse to cooperate. Both of these two aspects are extremely resource hungry and would need to be very well resourced for the set-up, and given adequate ongoing support beyond that period. It is vital that this is sustained, as early adopters of twin stream have shown that the benefits only remain if the education and enforcement is sustained.
- 7.5 None of the roll-outs have guaranteed to customers that the recycling rate will improve significantly as a consequence of introduction, so that might be an issue for the future as this becomes better understood, although falling residual waste rates may assist by masking this issue (recyclate will be a higher percentage of the overall if recycling continued at the same rate).

7.6

Option	Positive impacts	Negative impacts
1. Not to introduce paper and card collections at this time.	<p>No disruption to services- public satisfaction not adversely impacted.</p> <p>No additional disturbance of services at a time when staff are under pressure planning for other service changes (food and new contracts).</p> <p>No extra bins on streets, so no additional pressure on enforcement functions for this aspect of work.</p> <p>No increased costs for CoLC</p> <p>No risks from introducing an inequitable service</p>	<p>Risk of claims that we would not be compliant with government mandate- but this would be offset by the TEEP assessment.</p> <p>No change in reported contamination rates.</p> <p>Not recycling paper and card separately, may negatively impact EPR payments in the future (these are new supplementary payments made to local government by central government as recompense for recycling costs- the funds coming from charges made on packaging producers. The scheme and/or any potential payments have not yet been defined).</p>
2. 240L areas only	<p>Some improvement in reported contamination levels in these areas.</p>	<p>Risk of claims that we would not be compliant with government mandate- but this would be offset by the TEEP assessment.</p> <p>Disruption, but limited to areas more able to take an extra bin. Expected general adverse impact on satisfaction.</p>

		<p>'Enforcement' in target areas will be required which will include rejection of bins, adding to discontent and impacting satisfaction by those affected.</p> <p>More bins left out on some streets, likely to require significant work, and impact satisfaction scores.</p> <p>Inequitable service.</p> <p>Not recycling paper and card separately, may negatively impact EPR payments in the future (these are new supplementary payments made to local government by central government as recompense for recycling costs- the funds coming from charges made on packaging producers. The scheme and/or any potential payments have not yet been defined).</p> <p>Other financial implications- see finance section below.</p>
3. To do this in all areas (except areas without wheeled bins)	<p>Compliance with the government mandate (except areas without wheeled bins)</p> <p>Improvement in reductions in reported contamination levels (greater than option 2)</p>	<p>Significant disruption to all areas of the city. Expected general adverse impact on satisfaction.</p> <p>Enforcement and bin rejections will be required, adding to discontent and impacting satisfaction by those affected.</p> <p>Bins left on many streets likely to require significant work, and impact satisfaction scores.</p> <p>Financial implications- see finance section below.</p>

<p>4. Increased education and enforcement.</p>	<p>No wholesale disruption to services- only individuals may be affected. General public satisfaction not impacted.</p> <p>No wider/uncontrolled disturbance of wider services at a time when staff are under pressure planning for other service changes (food and new contracts).</p> <p>No extra bins on streets, so no additional pressure on PPASB relating to this specific function.</p> <p>Education might deliver improved public understanding /cultural shift for longer term benefit.</p> <p>Gives public opportunity to change and avoid the need for enforcement/extra bins if it works.</p> <p>No increased costs for CoLC arising from changed collections</p> <p>No risks from introducing an inequitable service,</p>	<p>Risk of claims that we would not be compliant with government mandate- but this would be offset by the TEEP assessment.</p> <p>Impact on 'contamination' will be slower than regime change.</p> <p>Does not deliver higher quality recycle quickly.</p>
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8. Strategic Priorities

8.1 Let's reduce all kinds of inequality

A key issue for this introduction would be the extent to which it could be deliverable. Partial delivery would leave some without access to the new format of service. In any event, there will be those on bags/communal bins who would not have access, even if the more comprehensive option 3 was considered palatable.

However, as the existing MDR system is not being withdrawn, strictly speaking, under the proposals no household is disadvantaged, as they would still retain the option to recycle paper and card, albeit through a mixed system.

8.2 Let's address the challenge of climate change

The paper and card initiative is focused on getting the correct materials in their designated bins, and thereby reducing rejected materials and low grade recycle rates.

As the proposal would predominantly utilise existing collection rounds, whilst there would be a small impact on carbon emissions from extra vehicle movements, any increase in carbon footprint would be offset by the improved quality of the recycle.

9. Organisational Impacts

9.1 Finance

9.1.1 There are no direct financial implications arising as a result of the recommendations of this particular report. However, set out below are the estimated financial implications associated with the introduction of separate paper and card collections should that be the eventual outcome.

9.1.2 There are two main areas of costs
a) Set-up (new bins/publicity/ contract costs for returns/ staff time)
b) Operating (day to day when the changes have settled)

9.1.3 **Set Up Costs**
LCC originally stated that they would provide the bins free of charge at set up, and up to 3% of the value of the bins at start up for three years for replacement, as they have for other districts that have adopted twin stream collections. In light of the government mandate on this issue, that offer has now been withdrawn. The bin set up, given LCC's withdrawn offer, would now be significant. Subject to the areas to be covered, potentially in excess of £1million.

9.1.4 LCC will however still offer to provide staff/education/enforcement/ support to drive home the change until settled (typically up to 6 months, but can be longer. This has not been quantified).

9.1.5 **Operating Costs**
The City would incur several new costs. These would not just be in staff time to prepare, support and embed the changes, but also there would be contract costs in the order of £20k p.a. for route changes, with an estimated annual revenue tail of £5k p.a. for new bins for housing growth in the city.

9.2 Legal Implications including Procurement Rules

9.2.1 There is one key item of legislation relevant to this proposal. The Environmental Protection Act 1990 (the statutory obligations to collect, which is placed on WCAs and the responsibility to dispose, which is placed on the WDAs).

- 9.2.2 The recently introduced Environment Act has mandated that food waste collections are made, and also that separate paper and card collections are made, unless a TEEP assessment exempts this.
- 9.2.3 The Environment Act 1990 sets out the relative statutory obligations of CoLC (as WCA) and LCC (as WDA). In simplified terms, S45 sets out the duty of a WCA to collect waste, and S46 identifies the requirements of a WCA to notify residents of its requirements so as to let it make the collections.
- 9.2.4 Any procurement will be undertaken in line with the Council's Contract Procedure Rules and the relevant legislation relating to the existing provision (Public Contract Regulations 2015 or Procurement Act 2023).
- 9.3 Equality, Diversity and Human Rights**
- 9.3.1 The Public Sector Equality Duty means that the Council must consider all individuals when carrying out their day-to-day work, in shaping policy, delivering services and in relation to their own employees.
- 9.3.2 It requires that public bodies have due regard to the need to:
- Eliminate discrimination
 - Advance equality of opportunity
 - Foster good relations between different people when carrying out their activities
- 9.3.3 This will be assessed carefully subject to the Executive expressing a clear view on a preferred option, whereby an EIA will be completed.
- 9.3.4 An EIA would take into account, amongst other things, accessibility and appropriate formats for any education campaign and the impact of additional bins on pavement access for individuals using wheelchairs or mobility aids or pushchairs.
- 9.4 Significant Community Impact &/or Environmental Impact**
- 9.4.1 Subject to the preferred option chosen, this change in waste/recycling policy has potential to impact communities / environment significantly.
- 9.5 Corporate Health and Safety implications**
- 9.5.1 This will be assessed carefully subject to the Executive expressing a clear view on a preferred option.
- 10. Risk Implications**
- 10.1 **(i) Options Explored**
As set out in 7.6
- 10.2 **(ii) Key risks associated with the preferred approach**
It may not bring about the desired change in behaviour, leading to a requirement to revisit this issue in the future.

11. Recommendation

- 11.1 Committee is invited to comment on the recommendation to delay consideration of installing separate paper and card collection in the city until 2027, but to engage with LCC to develop an education and enforcement campaign.

Is this a key decision? Yes

Do the exempt information categories apply? No

Does Rule 15 of the Scrutiny Procedure Rules (call-in and urgency) apply? No

How many appendices does the report contain? None

List of Background Papers: None

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