



Llywodraeth Cymru
Welsh Government

Number: WG52914

Welsh Government
Consultation – summary of response

Separate Collection of Waste Materials for Recycling – A Code of Practice for Wales (Revised)

Proposals for revisions to the ‘Separate Collection of Waste Materials for Recycling – A Code of Practice for Wales’ in light of planned amendments to the Waste Separation Requirements (Wales) Regulations 2023.

December 2025

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

This document provides an overview of the responses to the consultation '[Revisions to the Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales](#)', which ran for 12 weeks from 30 July to 22 October 2025.

In summarising the responses as they have been received, it should be noted that some responses include comments that are outside of the scope of this consultation or contain inaccuracies stemming from a misunderstanding of the regulations and/or the proposed revisions.

The responses to this consultation will inform the final drafting of revisions to the code, the planned amendments to the Waste Separation Requirements (Wales) Regulations 2023 and future communication and guidance on the reforms.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Revisions to the Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales](#)

Contents

Contents	3
1. Introduction	4
2. What we asked you	4
3. What you told us	7

1. Introduction

This document provides an overview of the responses to the consultation '[Revisions to the Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales](#)', which ran for 12 weeks from 30 July to 22 October 2025.

In summarising the responses as they have been received, it should be noted that some responses included comments that are outside of the scope of this consultation or contain inaccuracies stemming from a misunderstanding of the regulations and/or the proposed revisions.

The responses to the consultation will inform the final drafting of revisions to the code, the planned amendments to the Waste Separation Requirements (Wales) Regulations 2023 and future communication and guidance on the reforms.

1.1 Background

The consultation asked for comments on proposed revisions to the existing [Code of Practice](#) which provides practical guidance on how to comply with the separation requirements of the Workplace Recycling Law which came into force in April 2024.

The revisions implement the previously consulted upon commitment to require non-domestic premises to present small waste electrical and electronic equipment separately for collection by April 2026 and to improve clarity and consistency following feedback since the implementation of the Workplace Recycling Regulations.

2. What we asked you

2.1 Planned changes to the code to capture sWEEE

The code has been updated throughout to reflect planned amendments to the Waste Separation Requirements (Wales) Regulations 2023, so that from 6 April 2026 non-domestic premises will be required to present sWEEE separately for collection and onwards recycling. Currently only unsold sWEEE must be separated.

The proposed revised description of this waste stream within both the Waste Separation Requirements (Wales) Regulations 2023 and the code is:

- small waste electrical and electronic equipment

Accordingly, references in the code to 'unsold' sWEEE have been removed. This description will encompass unsold sWEEE.

Proposed amendments to the annexes of the code

Annexes 1–6 of the code list which sub-fractions should and shouldn't be placed in the six specified recyclable waste streams: paper and card; cartons, metal and plastic; glass; food; sWEEE; and unsold textiles. These lists will evolve over time based on

stakeholder input, new packaging types, recycling technology improvements, and alignment with other legislation.

Expanded polypropylene is currently difficult to separate and recycle at scale. Following stakeholder feedback, we propose removing it from Annex 2, which would also require an amendment to the Waste Separation Requirements (Wales) Regulations 2023.

Blister packaging (used for pharmaceuticals and tablets) is not commonly recycled and requires specialist processing. We proposed adding it to Annex 2 as a sub-fraction that should *not* be placed in the cartons, metal and plastic stream.

Hazardous waste must not be presented in any recyclable waste stream. Updates to the code clarify that waste classified as hazardous under the Hazardous Waste (Wales) Regulations 2005 should be handled accordingly. Natural Resources Wales is the regulator, and the code now includes links to guidance for identifying and managing hazardous waste.

Examples of mixed-use workplaces

In section 5, the code provides guidance on the considerations that a workplace can explore to identify whether they are obligated to comply with the separation requirements. It is made clear that examples of non-domestic properties are for illustrative purposes only.

Following stakeholder feedback, we have proposed removing the two examples of potential mixed-use premises at paragraph 5.5 as these were not considered necessary nor the best examples in this context. Given the wider list of ways to help someone determine if they are obligated to follow the separation requirements, we do not consider any examples are required.

Hospitals are no longer exempt from the separation requirements

Hospitals were given a two-year exemption to the separation requirements in the Waste Separation Requirements (Wales) Regulations 2023, which will automatically expire at the end of 5 April 2026. Therefore, from 6 April 2026, hospitals will have to comply with the separation requirements. The code has been updated to reflect this.

This exemption for hospitals is not a new policy and is outside the scope of this consultation. The consultation having only sought views on whether the code makes it clear that this exemption will no longer apply from 6 April 2026.

2.2 The questions we asked

Question 1: Please specify which sector you are representing?

Question 2: Are you satisfied that it is sufficiently clear within the code that sWEEE from non-domestic premises is now subject to the separation requirements?

Question 3: Are you satisfied that the updates made to paragraphs 4.18 and 6.8 of the code are sufficiently clear?

Question 4: Do you agree with the proposal to remove the two specific examples of mixed-use workplaces at paragraph 5.5?

Question 5: Are you satisfied that the expiration of the exemption for hospitals is clearly explained within the code?

Question 6: Do you agree with the addition of blister packaging (as described above) to the list of sub-fractions that should not be placed in the cartons, metal and plastic recyclable waste stream found at Annex 2?

Question 7: Are you satisfied that the description of “blister packaging used within the code of packaging items commonly used for pharmaceuticals and other tablets consisting of pre-formed plastic cavities or pockets usually sealed with a lid seal made of aluminium foil or plastic film” is sufficiently clear?

Question 8: Do you agree with the removal of expanded polypropylene from the list of sub-fractions that should be placed in the cartons, metal and plastic recyclable waste stream found at Annex 2?

Question 9: What, in your opinion, would be the likely effects of the proposed updates to the code on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Question 10. In your opinion, could the proposed updates to the code be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Question 11. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

2.3 The respondents

A total of 41 responses were received from a range of different type of organisations including responses submitted in an individual capacity. A list of those who responded by organisation type is provided in Table 1.

Table 1: Question 1- The number of responses by organisation type

Respondent Type	Response Count	Response Percentage (%)
i) A business	14	34%
ii) A third sector organisation	1	2%
iii) A public sector organisation	5	12%
iv) Local Authority waste collection service	8	20%
v) A waste management company	3	7%
vi) None of the above	10	24%
Total	41	100%

3. What you told us

3.1 Overall impressions

All proposed amendments to the code put forward in the consultation were supported by the majority of respondents who expressed an opinion. There was general agreement that it is clear that sWEEE (not just unsold items) must be presented separately for collection by waste services by non-domestic premises. However, whilst not related to the content of the code, several respondents raised concerns that due to the complexity of the existing hazardous waste guidance the code links to, small businesses could have difficulty assessing whether their waste is hazardous.

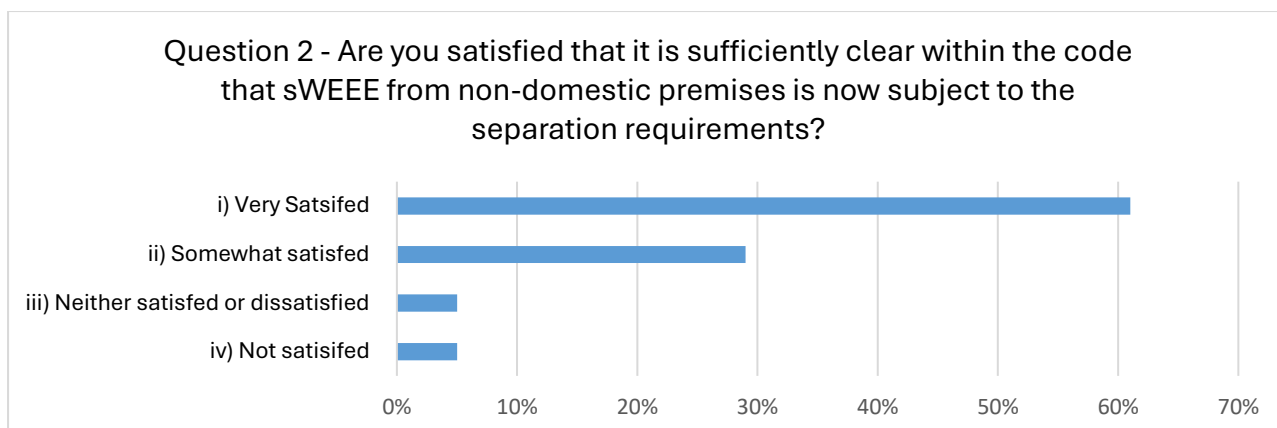
3.2 An overview of the responses to specific consultation questions.

This section provides an overview of the responses and sets out the number of responses to each closed question including responses such as “Yes”, “No” or “No opinion”. In some cases, a response was not given, and this is also recorded as ‘did not respond’. For each question, there was a box provided for respondents to explain an answer given and the main themes emerging from the responses are also summarised below.

Small waste electrical and electronic equipment (sWEEE)

Question 2: Are you satisfied that it is sufficiently clear within the code that sWEEE from non-domestic premises is now subject to the separation requirements?

The code has been updated to reflect the planned amendment to the Waste Separation Requirements (Wales) Regulations 2023 to capture sWEEE from 6 April 2026. The proposed description of this waste stream within the Waste Separation Requirements (Wales) 2023 and the code is small waste electrical and electronic equipment. Accordingly, references in the code to ‘unsold’ sWEEE have been removed.



The responses to Question 2 are broken down by organisation type and summarised in Table 2.

Table 2: Responses by type of organisation, Question 2 - Are you satisfied that it is sufficiently clear within the code that sWEEE from non-domestic premises is now subject to the separation requirements?

Respondent Type	i) Very satisfie d	ii) Somewhat satisfied	iii) Neither satisfied nor dissatisfied	iv) Not satisfi ed	To tal
i) A business	8	3	2	1	14
ii) A third sector organisation	1	0	0	0	1
iii) A public sector organisation	3	2	0	0	5
iv) Local Authority waste collection service	4	3	0	1	8
v) A waste management company	3	0	0	0	3
vi) None of the above	6	4	0	0	10
Total	25	12	2	2	41
Percentage (%)	61%	29%	5%	5%	

90% of respondents were either ‘very satisfied’ (61%) or ‘somewhat satisfied’ (29%) that it is sufficiently clear within the code that sWEEE from non-domestic premises is now subject to the separation requirements.

One waste management company who responded that they were very satisfied commented that ‘hopefully this will reduce contamination, and reduce the risk of fires, in both collection vehicles and processing sites.’

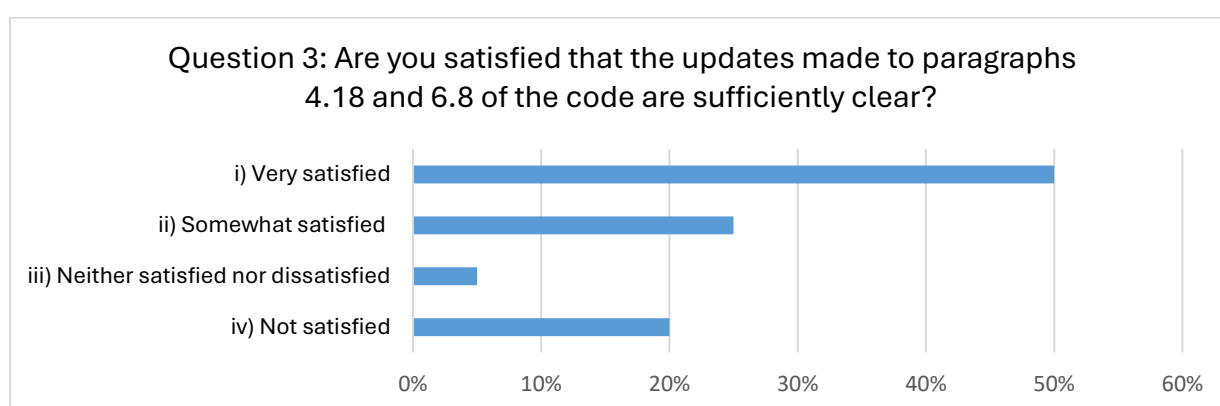
Of the two respondents who were not satisfied (5%), one stated that the code was unclear and confusing. One local authority waste collection service stated that the

definition of sWEEE (smaller than 50cm on the longest edge) differs from what they use to define small (i.e. smaller than 30cm), and that computer screens, TVs and microwaves are too large for their specific collection vehicles.

Recyclable waste items that may be considered hazardous under the Hazardous Waste Regulations (Wales) 2005

Question 3. Are you satisfied that the updates made to paragraphs 4.18 and 6.8 of the code are sufficiently clear?

We have updated sections 4.18 and 6.8 of the code to highlight that Natural Resources Wales is the regulator of the hazardous waste regime in Wales, as well as including a link to separate guidance which may help readers of the code to identify whether their waste is, or contains, hazardous waste and what to do if they have assessed their waste and are unsure if it is classified as hazardous waste.



The responses to Question 3 are broken down by organisation type and summarised in Table 3.

Table 3: Responses by type of organisation, Question 3 -. Are you satisfied that the updates made to paragraphs 4.18 and 6.8 of the code are sufficiently clear?

Respondent Type	i) Very satisfied	ii) Somewhat satisfied	iii) Neither satisfied nor dissatisfied	iv) Not satisfied	Total	Did not Answer
i) A business	7	2	2	3	14	0
ii) A third sector organisation	0	1	0	0	1	0
iii) A public sector organisation	3	2	0	0	5	0
iv) Local Authority waste collection service	4	1	0	3	8	0

v) A waste management company	2	1	0	0	3	0
vi) None of the above	4	3	0	2	9	1
Total	20	10	2	8	40	1
Percentage (%)	50%	25%	5%	20%	100%	

75% of the respondents were either very satisfied (50%) or somewhat satisfied (25%) that the updates made to paragraphs 4.18 and 6.8 of the code are sufficiently clear.

One fifth (20%) were not satisfied with the proposed updates. This included three businesses, three local authority waste collection service providers and two organisations who selected an organisation type category of 'None of the above'.

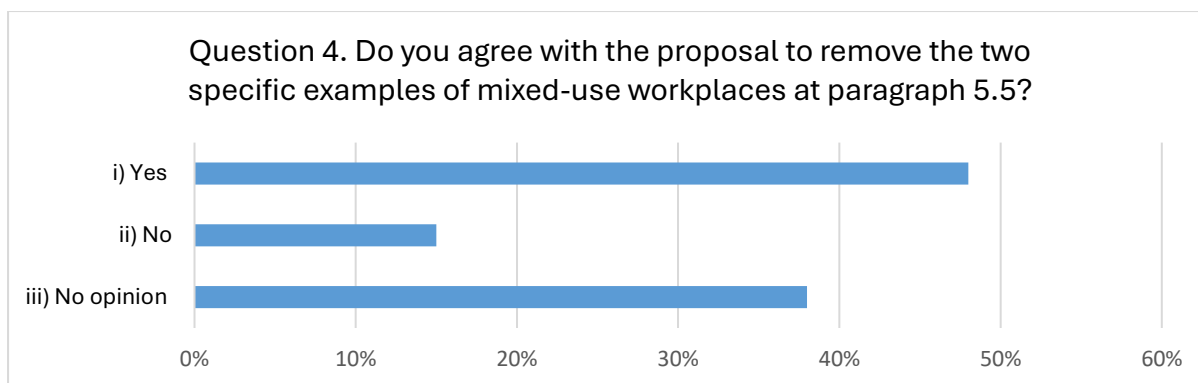
A number of these respondents commented that they felt it unrealistic to expect small business owners or other non-domestic settings to assess whether an item is to be classified as hazardous or not, with one organisation suggesting that this may result in improper disposal due to over-cautiousness. One business responded that the regulations provide vague examples rather than clear, actionable guidance and highlights their own experience in consulting collectors for advice who then referred them to the NRW, which highlights a 'circular information gap'.

Whilst these comments relate to the existing Hazardous Waste (Wales) Regulations (2005) and related hazardous waste guidance which the Code links to, rather than the content of the code itself, there is a recognised call to provide access to more general, entry-level advice to help workplaces navigate the Hazardous Waste (Wales) Regulations 2005 to assist compliance and prevent environmental harm.

Examples of mixed-use workplaces

Question 4. Do you agree with the proposal to remove the two specific examples of mixed-use workplaces at paragraph 5.5?

Following stakeholder feedback, we have proposed removing the two examples of potential mixed-use properties at paragraph 5.5 as these were not considered necessary nor the best examples in this context. Given the wider list of ways to help someone determine if they are obligated to follow the separation requirements, we do not consider any examples are required.



The responses to Question 4 are broken down by organisation type and summarised in Table 4.

Table 4: Responses by type of organisation, Question 4 - Do you agree with the proposal to remove the two specific examples of mixed-use workplaces at paragraph 5.5?

Respondent Type	i) Yes	ii) No	iii) No opinion	Total	Did not Answer
i) A business	5	3	6	14	0
ii) A third sector organisation	0	0	1	1	0
iii) A public sector organisation	3	0	2	5	0
iv) Local Authority waste collection service	5	0	3	8	0
v) A waste management company	2	1	0	3	0
vi) None of the above	4	2	3	9	1
Total	19	6	15	40	1
Percentage (%)	48%	15%	38%	100%	

Almost half of respondents (48%) agreed with the proposal to remove the two specific examples of mixed-use workplaces at paragraph 5.5. A further 38% had no opinion on this question. 15% were not in favour with the proposal.

A Trade Association that supported the proposal, suggested that an alternative example be provided instead. They also stated that they would ‘welcome more clarity on the enforcement approach for sole traders working from home’, as well as further discussions on how to ensure compliance in such environments.

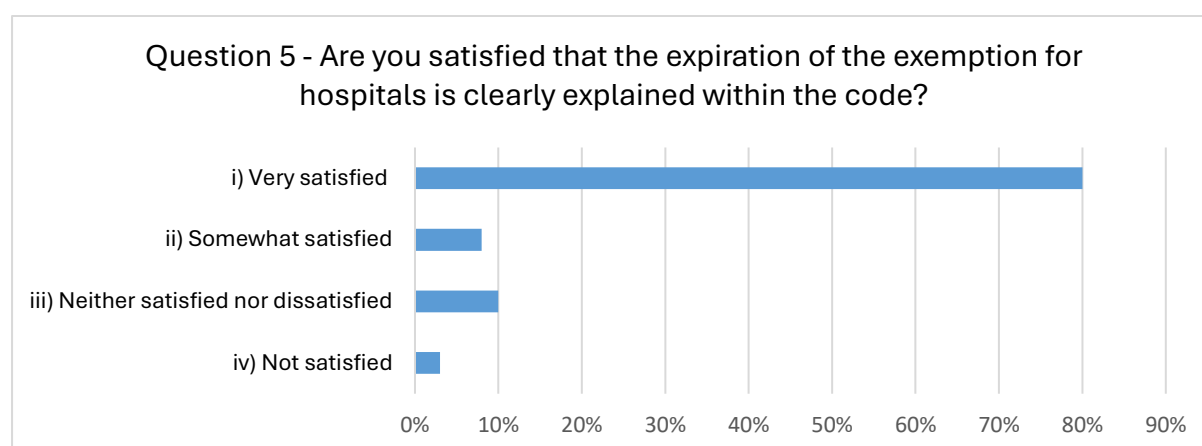
Those who disagreed (15%) with the proposal to remove the examples did so on the basis that examples are helpful to clearly illustrate the policy. One respondent suggests

that examples that cover both commercial and residential workplaces, such as nursing homes, would be very useful.

Hospitals are no longer exempt from the separation requirements

Question 5. Are you satisfied that the expiration of the exemption for hospitals is clearly explained within the code?

Hospitals were given a two-year exemption to the separation requirements in the Waste Separation Requirements (Wales) Regulations 2023, which will automatically expire at the end of 5 April 2026. Therefore, from 6 April 2026, hospitals will have to comply with the separation requirements. The code has been updated to reflect this.



The responses to Question 5 are broken down by organisation type and summarised in Table 5.

Table 5: Responses by type of organisation, Question 5 - Are you satisfied that the expiration of the exemption for hospitals is clearly explained within the code?

Respondent Type	i) Very satisfied	ii) Somewhat satisfied	iii) Neither satisfied nor dissatisfied	iv) Not satisfied	Total	Did not Answer
i) A business	9	0	4	1	14	0
ii) A third sector organisation	1	0	0	0	1	0
iii) A public sector organisation	5	0	0	0	5	0
iv) Local Authority waste collection service	7	1	0	0	8	0

v) A waste management company	3	0	0	0	3	0
vi) None of the above	7	2	0	0	9	1
Total	32	3	4	1	40	1
Percentage (%)	80%	8%	10%	3%	100%	

The vast majority of respondents (88%) were very satisfied (80%) or somewhat satisfied (8%) with the proposed changes that set out that hospitals will now need to comply with the separation requirements.

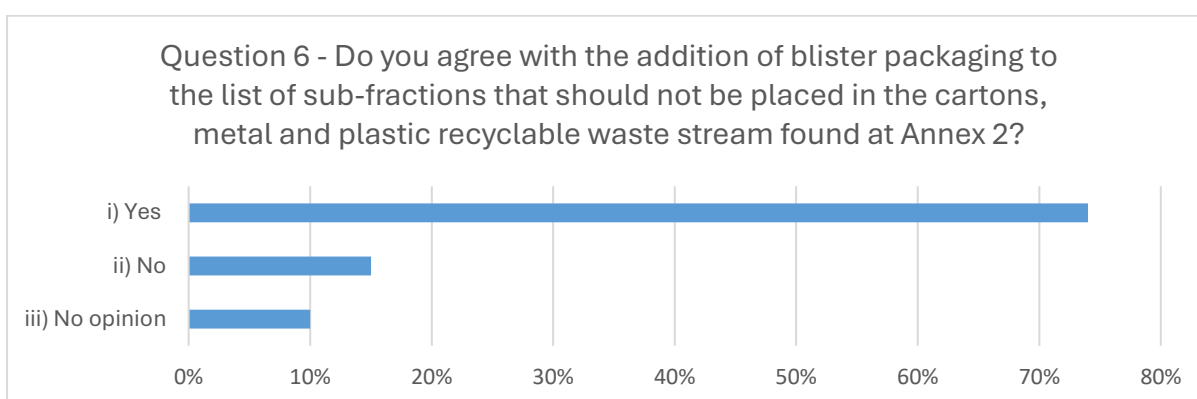
A Local Authority responded that they were somewhat satisfied, and as an authority waste collection service provider that they would be unable to service a hospital and questioned whether private firms are ready and compliant with these Regulations.

Of those that were neither satisfied or unsatisfied, or responded ‘not satisfied’, there were no further comments or suggestions for improvement.

One Trade Association who responded as ‘somewhat satisfied’, commented that whilst they are satisfied with the clarity regarding the expiration of the exemption, members have flagged some concerns around contamination of material streams in a hospital setting.

Amendments to the list of waste sub-fractions

Question 6: Do you agree with the addition of blister packaging (as described above) to the list of sub-fractions that should not be placed in the cartons, metal and plastic recyclable waste stream found at Annex 2?



The responses to Question 6 are broken down by organisation type and summarised in Table 6.

Table 6: Responses by type of organisation, Question 6 - Do you agree with the addition of blister packaging to the list of sub-fractions that should not be placed in the cartons, metal and plastic recyclable waste stream found at Annex 2?

Respondent Type	i) Yes	ii) No	iii) No opinion	Total	Did not Answer
i) A business	9	3	2	14	0
ii) A third sector organisation	0	0	1	1	0
iii) A public sector organisation	5	0	0	5	0
iv) Local Authority waste collection service	6	1	1	8	0
v) A waste management company	1	1	0	2	1
vi) None of the above	8	1	0	9	1
Total	29	6	4	39	2
Percentage (%)	74%	15%	10%	100%	

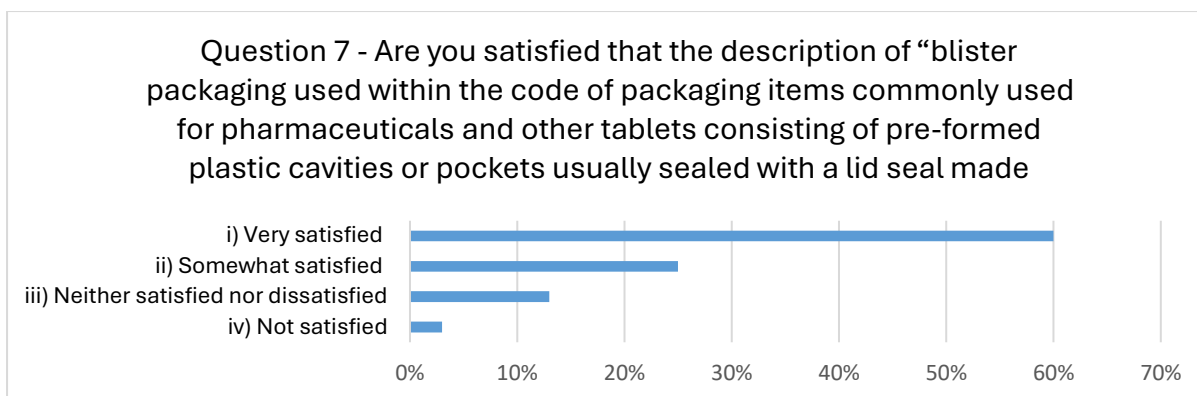
Nearly three quarters (74%) of respondents agreed that blister packaging should not be placed in the cartons, metal and plastic recyclable waste stream. One membership organisation responded that ‘local authorities see blister packs as a fairly regular contaminant in recycling streams, and we support the clear messaging and language within the guidance.’

10% of respondents had no opinion.

Of those who disagreed (15%), comments included:

- Only a small proportion of customers produce blister or mixed packaging, yet their waste could contaminate the majority who don’t
- It is unclear where in Wales facilities exist to separate mixed (contaminated) materials effectively
- Rather than banning difficult materials (e.g., blister packs), recycling infrastructure should be improved to handle them effectively

Question 7: Are you satisfied that the description of “blister packaging used within the code of packaging items commonly used for pharmaceuticals and other tablets consisting of pre-formed plastic cavities or pockets usually sealed with a lid seal made of aluminium foil or plastic film” is sufficiently clear?



The responses to Question 7 are broken down by organisation type and summarised in Table 7.

Table 7: Responses by type of organisation, Question 7 - Are you satisfied that the description of “blister packaging used within the code of packaging items commonly used for pharmaceuticals and other tablets consisting of pre-formed plastic cavities or pockets usually sealed with a lid seal made of aluminium foil or plastic film” is sufficiently clear?

Respondent Type	i) Very satisfied	ii) Somewhat satisfied	iii) Neither satisfied nor dissatisfied	iv) Not satisfied	Total	Did not Answer
i) A business	8	2	3	1	14	0
ii) A third sector organisation	1	0	0	0	1	0
iii) A public sector organisation	5	0	0	0	5	0
iv) Local Authority waste collection service	2	6	0	0	8	0
v) A waste management company	2	0	1	0	3	0
vi) None of the above	6	2	1	0	9	1
Total	24	10	5	1	40	1
Percentage (%)	60%	25%	13%	3%	100%	

Overall, 85% of respondents were either very satisfied (60%) or somewhat satisfied (25%) that the definition of blister packaging used within the code is sufficiently clear.

Those who were somewhat satisfied agreed that the description was sufficiently clear but with one organisation commenting that the list of items within the code of practice cannot be expected to be exhaustive. Of those who were neither satisfied nor dissatisfied, one commented that the focus should be on how the waste is handled.

Question 8: Do you agree with the removal of expanded polypropylene from the list of sub-fractions that should be placed in the cartons, metal and plastic recyclable waste stream found at Annex 2?

The responses to Question 8 are broken down by organisation type and summarised in Table 8.

Table 8: Responses by type of organisation, Question 8 - Do you agree with the removal of expanded polypropylene from the list of sub-fractions that should be placed in the cartons, metal and plastic recyclable waste stream found at Annex 2?

Respondent Type	i) Yes	ii) No	iii) No opinion	Total	Did not Answer
i) A business	6	5	3	14	0
ii) A third sector organisation	0	0	1	1	0
iii) A public sector organisation	3	1	1	5	0
iv) Local Authority waste collection service	7	0	1	8	0
v) A waste management company	3	0	0	3	0
vi) None of the above	8	1	0	9	1
Total	27	7	6	40	1
Percentage (%)	68%	18%	15%	100%	

68% of respondents agreed with the removal of expanded polypropylene (EP) from the list of sub-fractions that should be placed in the cartons, metal and plastic recyclable waste stream, with a further 15% having no opinion. A Local Authority that supported the removal of EP from the list, stated that the material is not widely recyclable and presents a significant risk of contamination within the recycling process; 'Its exclusion also aligns with broader efforts to reduce the use of non-recyclable, single-use plastic packaging, thereby supporting more sustainable waste management practices.'

The predominant response provided by the 18% who did not agree, including 5 businesses, was that they believe that recycling options should be available for EP, and government efforts should support this. One business suggests that due the common packaging's low density, EP is unsuitable for mixed waste disposal but can be recycled into adhesives.

One organisation commented that they welcome the removal of this packaging type from the list of sub-fraction due to it being increasingly problematic when disposed of incorrectly. However, they reiterated their stance that the list of items cannot be expected to be exhaustive.

Question 9: What, in your opinion, would be the likely effects of the proposed updates to the code on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

There were 28 open text responses to this question. Most respondents did not have an opinion on this question, and several felt there would be no positive or negative impacts on the Welsh language.

A Public Sector Organisation suggested that the Code ‘could recommend that all public-facing materials (e.g. bin labels, posters, leaflets) should be available in both languages.’

Question 10. In your opinion, could the proposed updates to the code be formulated or changed so as to:

- **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or**
- **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

There were 24 open text responses to this question. The majority respondents did not have an opinion on this question.

A Local Authority responded that the proposed updates to the code do not appear to negatively impact the Welsh language, and there are clear opportunities to promote its use. The council commented that they employ a significant number of Welsh speakers who can facilitate advice and guidance in their preferred language.

Question 11. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Overall, respondents were supportive of the proposed changes and principles behind the revised Code of Practice. However, a number of practical, logistical, and enforcement concerns were raised, particularly in relation to small businesses, rural areas, and consistency across local authorities.

- While the proposed measures are welcomed, small businesses highlighted that they face significant barriers in accessing recycling and waste service providers. One organisation suggested that small businesses should be able to take small

quantities of non-hazardous waste (e.g. small electrical items, blister packaging) to local authority recycling points, similar to domestic users.

- A Trade Association considers that it would be good practice for Welsh Government to include a change table at the beginning of the document, to both summarise and highlight where the key changes are throughout.
- A Public Sector Organisation suggested that the revised code should allow for some flexibility for settings where small businesses often have limited storage space for multiple containers and in rural areas longer travel times for collection rounds.
- Stronger coordination between Natural Resources Wales (NRW) and local council enforcement teams was recommended by a Local Authority to ensure compliance by both producers and collectors.
- A Public Sector Organisation have requested clarity on whether litter collected by non-Principal Litter Authorities is subject to the same separation requirements as other controlled waste.

- **Annex 1: List of respondents**

- This list does not include those respondents who asked for their response to be kept confidential.
- It also does not include those respondents who did not specifically respond to this question in their response.

Name	Type of Organisation
CSA Group Testing UK LTD	A business
CWM Environmental Ltd	Local Authority waste collection service
Hafren Fasteners	A business
Flintshire County Council	Local Authority waste collection service
The Gamers' Emporium	A business
Reconomy Connect	A waste management company
Coleg Cambria	A public sector organisation
LARAC	Local Authority waste collection service
Canal & River Trust	A third sector organisation
Nuclear Restoration Services	A public sector organisation
Transport for Wales	A public sector organisation
Thinkman Ltd	A business
Environmental Services Association	Trade Association
Newport City Council	Local Authority waste collection service