

FULL IMPACT ASSESSMENTS

A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

1. Policy objectives

What decision are you impact assessing?

- 1.1. The Welsh Government introduced the Workplace Recycling regulations which came into force on 6 April 2024. These regulations require all non-domestic premises to separate key recyclable materials in the way the majority of Wales' householders already do. This includes all schools and colleges, and other business and public sector premises that young people visit.
- 1.2. The regulations:
 - require the occupiers of non-domestic premises (including businesses, charities and public sector bodies) to present specified recyclable materials for collection separately from each other and from residual waste;
 - require those that collect the materials to collect them by means of separate collection and to keep them separate;
 - ban certain separately collected recyclable materials from incineration and landfill;
 - ban all wood waste from landfill;
 - commence a ban on disposal of food waste to sewer from non-domestic premises.
- 1.3 The Regulations are being amended to reflect that from April 2026 non-domestic premises will be required to separate small electrical and electronics waste (sWEEE) and not just unsold sWEEE (which was the case when the original Regulations were introduced in April 2024). This CRIA has been reviewed and updated where needed in light of this intended amendment and with any relevant feedback or experience since phase 1 of the regulations came into force in April 2026.
- 1.4 The stakeholders obligated by these regulations and with the responsibility to comply are workplaces and the waste sector so in the vast majority of cases children and young persons are not **directly** impacted by this policy as most are not yet part of the workforce, or where they are, would not generally be the person/persons ultimately responsible for enabling compliance and/or any consequences related to non-compliance. However, children and young persons are indirectly impacted through i) their school / college and other places children and young people attend for work or leisure being obligated to separate their recyclable waste in the required way and ii) as beneficiaries of the intended policy outcomes that will reduce carbon emissions and our reliance on extraction of raw materials.

- 1.5 The regulations deliver against two overarching Programme for Government (PfG) commitments:
- to build a stronger, greener economy as we make maximum progress towards decarbonisation; and
 - to embed our response to the climate and nature emergency in everything we do, which is absolutely critical to supporting children and young people.
- 1.6 The reforms are a core element of the Welsh Government's action to deliver its commitment to zero waste and contribute to significant carbon savings by bringing non-domestic recycling in line with the successful Welsh domestic recycling system. These reforms will benefit everyone in Wales, especially those vulnerable and future generations, by tackling waste reduction, creating carbon savings, and providing the materials necessary to drive progress towards a circular economy.
- 1.7 For Wales to tackle the climate and biodiversity crises, we must take a no-regrets approach to investment in the green economy and climate-proofing now.¹ Extracting and retaining greater economic benefit from the materials collected from non-domestic premises in Wales will improve supply chain resilience whilst reducing our reliance on raw materials from overseas. These reforms are therefore a key action to tackle resource efficiency and reduce the consumption of raw materials, thereby addressing root causes of the climate and nature crisis.

2 Gathering evidence and engaging with children and young people

What existing research and data on children and young people is available to inform your specific policy? Your policy objective may impact on other policy areas – discussions with other policy teams will be an important part of the impact assessment process ensuring you have gathered a range of information and evidence.

- 2.1 The foundations of the workplace recycling legislation stretch back to before the Environment Wales Act 2016. In 2010, Towards Zero Waste² formally set out a long-term plan to reduce the impact of waste in Wales by aiming to eliminate residual waste and recycle any waste that is produced. It stated that “To achieve a high level of recycling, we need to make sure that all our recyclates are separated at source so that they are clean and of high value.” The consideration of children and young people and the wellbeing of future generations is a strong theme throughout the strategy and is reviewed in the Towards Zero Waste Progress Report.³
- 2.2 A review of existing literature, for example the Welsh Youth Parliament's Littering and Plastic Waste Committee published a report in 2020, 'Reduce, Reuse, Recycle', found that:

¹ Welsh Government, Beyond Recycling Integrated Impact Assessment, 2021, [beyond-recycling-integrated-impact-assessment.pdf \(gov.wales\)](#).

² Welsh Government, Towards Zero Waste, 2010, [towards-zero-waste-our-waste-strategy.pdf \(gov.wales\)](#).

³ Welsh Government, Towards Zero Waste 2010–2050 Progress Report, 2015, [towards-zero-waste-progress-report-july-2015.pdf \(gov.wales\)](#).

- 87% of Welsh youth think that reducing, reusing and recycling waste is important to them;
- a large proportion of those surveyed felt it was important to reduce, reuse and recycle litter and plastic waste at home (87%), when out with family or friends (84%), and at school (84%);
- 85% are confident that they know what they can recycle;
- 67% of young people know of other ways to reduce littering and plastic waste aside from recycling;
- 38% would choose items with less packaging;
- 12% would file a complaint or shop elsewhere if a company/ organisation did not handle its waste responsibly.

2.3 They also saw written survey responses that young people wanted to see shops and producers doing more to respond to reuse and recycling. There was reference to the need to reduce packaging, for shops to offer refilling stations and use biodegradable packaging.

2.4 These responses align strongly with broader stakeholder opinions regarding reuse and recycling and feedback that has led to these reforms.

Using this research, how do you anticipate your policy will affect different groups of children and young people, both positively and negatively? Please remember policies focused on adults can impact children and young people too.

2.5 The climate and nature emergencies affect everyone, but the negative impacts will be felt disproportionately by our children and young people and future generations.⁴ Climate change has been identified as one of the biggest threats facing our future generations; implementing the legislation will have a direct positive impact on our environment, health and well-being, and the economy in the short and long term. In its assessment of the Collections Blueprint, Eunomia⁵ found that the capturing of high-quality material through the separate collection of waste is likely to support retention of material within the Welsh and UK economies – resulting in social and economic benefits in line with the objectives of the Well-Being of Future Generations (Wales) Act 2015.

2.6 The regulations present an opportunity to create parity between households and non-domestic premises. Presenting recycling in separated recycling streams and separate from residual waste is the current practice of households across most of Wales. The regulations will be promoting greater equality and consistency by now requiring non-domestic premises to separate their recycling the way householders do. It will provide equal opportunities for everyone, whether at work, rest or play, to participate in recycling.

⁴ “Health and wellbeing impacts of climate change”, 2021, <https://phw.nhs.wales/news/new-resource-highlights-health-impacts-of-climate-change/climate-change-infographics-english/>.

⁵ Review of the Welsh Government Collections Blueprint, *Eunomia*, 2016, <https://www.eunomia.co.uk/reports-tools/review-of-the-welsh-government-collections-blueprint/>.

- 2.7 Article 12 of the UN Convention on the Rights of the Child denotes the right of children and young people to voice opinions on all issues that affect them and for that opinion to be taken seriously. In addition, the Well-being of Future Generations Act (2015) sets out seven Well-being Goals and the requirement to involve people with an interest in achieving the well-being goals as one of its five ways of working. Children and young people being stakeholders directly affected by these reforms who will reap many positive benefits.
- 2.8 We want to harness the passion and enthusiasm of our young people, utilising the levers at our disposal such as our environmental education programmes and EcoSchools, to ensure we involve children and young people and influence positive behaviour change and creative thinking amongst our next generation.
- 2.9 We have provided the tools to inform community action. This includes support tools to help to implement the changes, such as best practice case studies, guides, downloadable signage, bin signs and posters, online webinars, and other resources. By supporting local actions, it will collectively make a big difference. For example, the Welsh Government is promoting and supporting the procurement of receptacles with recycled content for the public sector. A key priority of this agreement is to increase recycled polythene content within the products supplied. This approach will allow participating organisations to make a decision that is aligned to their environmental and commercial strategy. We will engage with our schools and communities, working with citizens to support local initiatives and resource efficient actions.

What participatory work with children and young people have you used to inform your policy? If you have not engaged with children and young people, please explain why.⁶

- 2.10 Our engagement to-date includes more than a decade of consultation and ongoing engagement to come to the final policy position, underpinned by data gathering and analysis and stakeholder engagement. The Welsh Government has engaged with a range of stakeholders on source separation policy development on an ongoing basis dating back to 2009 at least.
- 2.11 **2009 Towards Zero Waste consultation:** The consultation on this policy document included the aim *“To achieve a high level of recycling, we need to make sure that all our recyclates are separated at source so that they are clean and of high value. We aim to develop an efficient and effective collection system to separate mixed commercial and industrial waste.”*
- Three consultation events took place across Wales - stakeholders came from the public, private and voluntary or third sectors.
 - A consultation for young people.
 - Formal online consultation open to all.
- 2.12 **2013-14 - Environment Bill White Paper consultation:** The separation duty was consulted on in the Environment Bill White paper consultation through:

⁶ Article 12 of the UNCRC stipulates that children have a right to express their views, particularly when adults are making decisions that affect them, and to have their opinions taken into account.

- four regional consultation events were held for the public;
- stakeholder holder workshops;
- formal online consultation open to all.

2.13 **2019-2020 - Consultation on Beyond Recycling, the Circular Economy Strategy for Wales:** This consultation included two specific objectives related to these reforms *“To promote higher recycling of business and public sector waste, our aim is to require recycling in all non-domestic settings, separating waste in the way households already do...”* and *“We will legislate to ensure that separated key recyclables are banned from energy recovery or landfill.”* Young people were extensively consulted during the development of the strategy, including:

- Approximately 40 face-to-face events were carried out, including open invitation sessions and regional events tailored to specific audiences which **included young people**, local authorities, businesses, the waste sector, environmental groups, regulators, and academics.
- The official consultation events had many held in communities and schools. Those who attended were not only asked what they thought about the consultation as drafted, but what their ideas were for a Wales to achieve zero waste, net zero carbon and a more circular economy.
- Formal online consultation which included for the consultation the aim: *“To promote higher recycling of business and public sector waste, our aim is to require recycling in all non-domestic settings, separating waste in the way households already do.”*
- An easy-read version⁷ of the consultation was distributed to all eco-schools. Whilst we appreciate that easy read documents are not specifically aimed at children and young people, their simple and clear nature supported with visual aids can be a useful tool for engaging this audience group.

2.14 **2019 Consultation on Increasing Business Recycling in Wales:** A formal consultation in late 2019 set out proposals to bring forward statutory instruments (SIs) to increase recycling from non-domestic premises such as businesses and the public sector in Wales.⁸ A total of 100 responses were received from 96 different organisations.

2.15 **2022-23 Consultation on the Workplace Recycling Legislation:** Between 2022 and 2023 the Welsh Government engaged stakeholders and the public on the legislation in the following ways:

- Formal public consultation on both the draft Code of Practice and enforcement proposals 2022-23, receiving 95 responses from 79 different organisations on the Code of Practice and 39 responses from 33 organisations on the enforcement regime.

⁷ [Beyond recycling | GOV.WALES](#)

⁸ Welsh Government, Consultation – summary of response. Increasing Business recycling in Wales, 2021, <https://www.gov.wales/sites/default/files/consultations/2021-03/summary-of-responses-increasing-business-recycling-in-wales.pdf>.

- Informal meetings with a range of stakeholders over three years.
 - Five virtual consultation events with a range of sectors including the voluntary and community sector, businesses, local government and the wider public sector.
- 2.16 Our most recent consultation, from July – October 2025, sought views on the changes to the code necessary to reflect the requirement for non-domestic premises to present small electricals for separately for collection by April 2026; and other minor updates to improve clarity and consistency to the Code of Practice. In total there were 41 responses with the majority of people (90%) stating they were either very satisfied or somewhat satisfied that it is sufficiently clear within the code that sWEEE from non-domestic premises will be subject to the separation requirements from April 2026.
- 2.17 The latter consultations did not specifically target children and young people given the focus of the policy on workplaces and the waste sector and the relatively technical nature of the questions concerned. Furthermore, in specific relation to the sWEEE requirement, children are unlikely to take sWEEE items to school, college etc for disposal purposes.
- 2.18 Throughout our extensive engagement on this policy of source separation, the Welsh Government has not found evidence of specific negative impacts for children and young people.
- 2.19 Through the development of this policy, the Welsh Government and stakeholders will continue to identify emerging issues for children and young people. Children and young people will play a prominent role in driving our circular economy forward. We will continue to support our current and future generations through education, training and our environmental programmes. This is crucial to growing awareness of recycling and building an understanding of climate change, emissions, energy use and waste generation.

3 Analysing the evidence and assessing the impact

Using the evidence you have gathered, what impact is your policy likely to have on children and young people? What steps will you take to mitigate and/or reduce any negative effects?

- 3.1 Children and young people play a critical role in supporting Wales' commitments to reach zero waste and net zero carbon emissions by 2050, as well as supporting our progress towards a more circular economy. These reforms are critical to tackling the climate and nature emergency which is not only key to driving up the quantity and quality of recycling from non-domestic premises but is also a vital component in the delivery of Wales' commitments to reach zero waste and net zero carbon emissions by 2050. They will also help us to reduce environmental pollution and the impact we have outside of Wales through the extraction of raw materials for the goods we consume.

- 3.2 To date, the Welsh Government has invested over £1 billion in household recycling, which has transformed Wales from a nation that recycled less than 5% of its municipal waste to over 66.5% in 2023-24 and is already contributing savings of around 400,000 tonnes of CO2 emissions a year. These reforms to improve our business, public and third sector recycling will see us taking the next step in our journey as a recycling nation. Continued action in this area is key to our commitments to embed our response to the climate and nature emergency in everything we do and build a stronger, greener economy as we make maximum progress towards decarbonisation; creating a green and prosperous Wales for future generations.
- 3.3 The Children's Commissioner for Wales conducted a survey⁹ in November 2024 to ask children and young people how they help the environment at home, in school, and in their community, and how aware they are of local and national action in this area. Over 1000 responses were received from children aged 6 to 18 years of age. In response to the question 'what is your school/ community group doing', 77% stated recycling and 60% stated a food waste bin was used. While it is still early days to evaluation the phase one workplace recycling regulations effectively, these are encouraging numbers.
- 3.4 However, only 20% of respondents stated they knew what Welsh Government are doing to help the climate/environment showing there is more work to be done to reach this target audience. Natural Resources Wales has produced a resource pack for schools to help them understand their responsibilities and legal requirements under the (phase one) legislation and to provide opportunities for building this into their curriculum and to engage students. This will raise awareness and also improve compliance. The pack was shared with Education and Waste Departments in Local Authorities, the WLGA, as well as Eco schools and individual schools that have been visited. Natural Resources Wales will also be emailing schools in Wales in spring 2026 as part of awareness raising for the phase two changes to sWEEE. There will also be a Welsh Government phase two communications campaign, however this will not target children and young people specifically, due to the policy being aimed at workplaces and due to its technical nature, as stated earlier.
- 3.5 We have also worked closely with WRAP who have developed guidance¹⁰ for the education sector including all schools, colleges and universities in Wales to explain how to comply with the workplace recycling law. This is in addition to WRAP's posters and signage which provide a visual or clear and simple lists of materials that can and cannot be recycled. Promotional videos have also been developed to show the positive impact on schools, including workplace recycling at Ysgol Rhiw-Bechan, Powys¹¹.

⁹ [Helping the Environment - Snapshot Survey of Children and Young People in Wales](#)

¹⁰ [The Business of Recycling Wales Guidance for all workplaces](#)

¹¹ [Workplace Recycling at Ysgol Rhiw-Bechan, Powys](#)

3.6 Although it did not refer to workplace recycling directly, the Welsh Youth Parliament's 'Reduce, Reuse, Recycle' report¹² suggests that children and young people favour the circular economy aims with which the workplace recycling reforms aligns. Its findings include:

- 87% of Welsh youth think that reducing, reusing and recycling waste is important to them.
- 67% of young people know of other ways to reduce littering and plastic waste aside from recycling.
- 38% would choose items with less packaging.
- 12% would file a complaint or shop elsewhere if a company/ organisation did not handle its waste responsibly.
- Written survey responses identified that young people wanted to see shops and producers doing more to respond to reuse and recycling. There was reference to the need to reduce packaging, for shops to offer refilling stations and use biodegradable packaging.

How does your proposal enhance or challenge children's rights, as stipulated by the UNCRC articles and its Optional Protocols? Please refer to the articles to see which ones apply to your own policy.

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 12 Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account.	X		<p>With regards to the Beyond Recycling Strategy, as referenced earlier in this document, children and young people were given opportunities to express views via targeted events and easy read materials. Whilst we appreciate that easy read documents are not specifically aimed at children and young people, their simple and clear nature supported with visual aids can be a useful tool for engaging this audience group.</p> <p>Children and young people are mainly indirectly affected by the workplace recycling reforms, however, they will benefit immensely from the many environmental, economic and</p>

¹² [Litter and Plastic Waste - The Welsh Youth Parliament's report on reducing litter and plastic waste](#)

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
			<p>health benefits as outlined in the Beyond Recycling Strategy.</p> <p>Children and young people will be directly affected as these reforms cover schools and colleges and other places that they visit. They will be expected to place their rubbish in the right recycling bin, although overall responsibility to comply will ultimately rest with the premises leadership . However, it is very unlikely that the amended regulations (the sWEEE requirement) will affect this stakeholder group as children and young people are not likely to bring sWEEE to school or college for disposal purposes.</p>
Article 13 Children have the right to get and to share information as long as the information is not damaging to them or to others.	X		<p>We have provided information and tools to support all non-domestic premises and the waste sector to comply with the regulations, such as best practice case studies and guides and downloadable signage and resources. In addition, the gov.wales content will be updated, and there will be a national campaign focused on social media, engaging with traditional media and working with our partners.</p> <p>All summary data on how waste is managed in Wales published on the internet, for all to access. More detailed data is available on request.</p> <p>Guidance for eco-schools has been developed and distributed to explain the workplace recycling laws along with posters and simple visual checklist materials.</p>

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
Article 24 Children have the right to good quality health care and to clean water, nutritious food and a clean environment so that they will stay healthy. Rich countries should help poorer countries achieve this.	X		The climate and nature emergency are a pressing issue affecting current and future generations. These reforms directly promote Article 24 and will help to alleviate significant concerns relating to a clean environment. These regulations mean that workplace recycling is brought into line with the successful household recycling system in Wales which contributes savings of almost 400,000 tonnes of CO ₂ emissions a year, ensuring a cleaner, greener, and healthier Wales for children and young people.
Article 28 Children have the right to an education. Primary education should be free and compulsory. Secondary and higher education should be accessible to every child. Discipline in schools should respect children's dignity, and education should prepare them for life in a free society, promoting equality and respect for human rights.	X		3.6 Article 28 supports children's right to receive quality education, including vocational and environmental learning. Children are already learning about the importance of recycling and its place in the workplace as highlighted by the video developed to show the positive impact of recycling by Ysgol Rhiw-Bechan, Powys ¹³ . To enable collaboration in educational settings Natural Resources Wales has produced a resource pack for schools to help them understand their responsibilities and legal requirements under the (phase one) legislation, and WRAP has developed guidance ¹⁴ for all schools, colleges and universities in Wales to explain how to

¹³ [Workplace Recycling at Ysgol Rhiw-Bechan, Powys](#)

¹⁴ [The Business of Recycling Wales Guidance for all workplaces](#)

UNCRC Articles or Optional Protocol	Enhances (X)	Challenges (X)	Explanation
			comply with the workplace recycling law. This is in addition to posters and signage which provide a visual or clear and simple lists of materials that can and cannot be recycled.

- 3.7 The workplace recycling reforms do not impact upon any of the articles in the Human Rights Act. Guidance is available to support the implementation of the regulations. The intention is to provide information which will ensure there is clarity for enforcing officers, suppliers, retailers and members of the public. It will be published and available to all citizens. For more information, see the Equality Impact Assessment.

4 Communicating with Children and Young People

If you have sought children and young people's views on your proposal, how will you inform them of the outcome?

- 4.1 The consultations that led to and informed these reforms have actively engaged young people. Young people's views on the detailed and technical specifics of the workplace recycling reforms have not however been additionally sought outside of the general consultation processes. This is because the focus of the workplace recycling reforms are 'workplaces' and waste sector specific and sometimes technical in nature. The impacts will benefit children and young people positively, and children and young people will engage with the reforms when they are in workplaces, they are not the primary objective of the reforms. That said, children will be affected by this policy in terms of the benefits, and impacted as they will need to put their rubbish in the correct bins when they visit workplaces such as schools, leisure centres, cafes etc in the same way in which they will already do at home. We do not expect that the amended regulations will have an effect on children as they are very unlikely to bring sWEEE to school, college, leisure facilities etc for disposal purposes.
- 4.2 Eco-Schools and Size of Wales are the main platforms Welsh Government has to engage directly with children and young people on sustainable behaviours, climate change and natural resource priorities. The programmes have developed an eco-aware generation who are not simply focussed on waste reduction and recycling but on how schools and communities can contribute towards improving wider outcomes within their communities whilst reducing emissions.¹⁵ Many schools are already engaging in this work by taking action

¹⁵ "Eco-Schools", *Keep Wales Tidy*, <https://keepwalestidy.cymru/eco-schools/>.

to reduce their waste, creating local partnerships with businesses and other organisations to improve their local communities and find further uses for the materials.

- 4.3 Welsh Government will continue to use the Eco Schools platform and Local Authorities to engage children and young people. In doing so, we will update the easy read of the summary of the code of practice, communications, tools and guidance materials. There was a national communications and social media campaign to raise awareness of the 2024 requirements and we will consider the level and scale of communications required in order to fully inform all stakeholders, including children and young people, about the sWEEE separation requirements that are proposed to come into effect from April 2026. We will also use the WRAP iconography produced to help visitors to workplaces understand what rubbish goes in which bin. This will be using simple images, designs, and consistent colours to aid people in their understanding and to ensure compliance. In addition, we have provided information and tools to support non-domestic premises (including schools and colleges) and the waste sector to comply with the regulations, such as best practice case studies (including one of a primary school) and guides and downloadable signage and resources. The intention is to provide information which will ensure there is clarity for enforcing officers, suppliers, retailers and members of the public.

5 Monitoring and Review

Please outline what monitoring and review mechanism you will put in place to review this CRIA.

- 5.1 The Welsh Government will publish a post implementation monitoring plan which will seek to measure the success of primary and secondary objectives of the reforms. The plan will require the Welsh Government to periodically review that the benefits of the policy will benefit future generations and children, to make sure they are being realised.

Following this review, are there any revisions required to the policy or its implementation?

- 5.2 The outcomes of the regulation implementation will be monitored with a combination of quantitative and qualitative methods, depending on the nature of the outcome and the availability of an appropriate data source. It is currently envisaged that the Waste tracking system will, from 2025 onwards, be used as a primary data source to track recycling levels for industrial and commercial waste in Wales, as it will provide information allowing measurement of the amount of waste sent for recycling, landfill, or incineration, and where it is disposed of.
- 5.3 In the event of any data gaps or delays with the deployment of the Waste Tracking system, a number of additional data sources exist and may be used in the interim: They include, WasteDataFlow, Extended Producer Responsibility Scheme for packaging, National Resources Wales (NRW)

waste and recycling surveys, NRW 'site return' data.

- 5.4 The outcomes relating to the reduced disposal of food waste to sewer will be monitored during the inspections carried out by Local Authority Environmental Health Officers, who will report the premises disposing of food waste to sewer.
- 5.5 In addition to the above, the Welsh Government will explore the need for specific commissioned surveys to further monitor the extent of compliance and any potential barriers to the successful implementation of the proposals or add regulation-specific questions to the already planned future business surveys. This could include consideration of how well children and young people can understand and comply with the requirements to sort their waste in the non-domestic premises they visit. Moreover, qualitative data gathered during the NRW, LA and Welsh inspections of non-domestic premises and waste handlers will further inform about the impacts of the regulations on businesses and will be used to identify the ways of lifting potential barriers.
- 5.6 The above constitutes an extensive but not exhaustive list of the wider benefits that the regulations will help to achieve. The success in achieving these outcomes will, however, depend on the range of policies currently in place and/or introduced in the future. The exact scale and scope of potential wider benefit measurement actions will be determined based on the availability of resources. The need for wider benefit post-implementation monitoring will be included in the Welsh Government's business planning and budget setting process, which has to balance priorities with the available resources.