

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

- 1.1 The Welsh Government introduced the workplace recycling regulations¹ which came into force on 6 April 2024. These regulations require non-domestic premises to separate key recyclable materials in the way households do across most of Wales. The Welsh Government intends to amend the separation requirements to bring in the commitment for workplaces to present small waste electrical and electronic equipment (sWEEE) separately for collection and recycling from 6 April 2026. Currently workplaces are only required to separate **unsold** sWEEE.

Long term

- 1.2 In line with the Well-being of Future Generations (Wales) Act, these reforms improve the long-term social, economic, environmental, and cultural well-being of Wales. The existing regulations and the proposed amendment support workplaces to take action by keeping high quality materials in circulation, which is a key part of the move to a circular economy and an important action to address the climate and nature emergency. The separate presentation of sWEEE creates the opportunity for even more valuable and often finite resources to be recovered that would otherwise be lost.

Prevention

- 1.3 The reforms increase the quality and quantity of recycling of waste materials produced in non-domestic premises in Wales and, in doing so, support Wales' commitments to reach zero waste and net zero carbon emissions by 2050.
- 1.4 By implementing these reforms we are:
- providing greater security of supply of resources to manufacturers;
 - accelerating progress towards a circular economy for Wales;
 - reducing reliance on the extraction of virgin raw materials, a root cause of the global biodiversity crisis;
 - reducing greenhouse gas emissions;
 - sustaining and creating new jobs and investment in the green economy.

¹ This is the collective name given to three regulations that brought into effect reforms to the separation, collection and disposal of waste from non-domestic properties. The relevant regulations are: The Waste Separation Requirements (Wales) Regulations 2023, The Prohibition on the Incineration, or the Deposit in Landfill, of Specified Waste (Wales) Regulations 2023, The Prohibition on Disposal of Food Waste to Sewer (Civil Sanctions) (Wales) Order 2023.

Integration

- 1.5 These reforms are a key part of how we are delivering on our Programme for Government (PfG) commitments to build a stronger, greener economy based on the principles of sustainability and the industries and services of the future and embedding our response to the climate and nature emergency in everything we do.
- 1.6 Commencing these regulations has more closely aligned the systems for household and workplace recycling improving consistency and reducing citizen confusion.

Collaboration & Involvement

- 1.7 The Welsh Government has consulted and engaged extensively on the policy of source separation for over a decade and has continued to engage and formally consult with stakeholders including workplaces, the waste sector and Natural Resources Wales in the development of the policy and regulations². Surveys show widespread support for the reforms more generally, including among decision-makers at organisations who will be affected by these regulations³. Our most recent public consultation in 2025 sought views on the changes to the Code necessary to reflect the requirement for non-domestic premises to present small electricals separately by April 2026 and other minor updates to improve clarity and consistency to the Code of Practice⁴. In total there were 41 responses. All amendments to the Code proposed in the consultation were supported by the majority of respondents that expressed an opinion.

² Relevant consultations include: [Circular economy strategy | GOV.WALES](#) (2019) ; [Increasing recycling by businesses | GOV.WALES](#) (2019); [Consultation on the Separate Collection of Waste Materials for Recycling: A Code of Practice for Wales \[HTML\] | GOV.WALES](#) (2023); [Proposals for enforcing business, public and third sector recycling regulations in Wales \(closed February 2023\) \[gov.wales\]](#) (2023).

³ [Public attitudes on the changes to workplace recycling and the ban on single use plastics | GOV.WALES](#)

⁴ [Consultation on the Separate Collection of Waste Materials for Recycling – A Code of Practice for Wales \(Revised\) \[gov.wales\]](#) (2025)

Impact

1.8 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. These reforms will also:

- Create opportunities for jobs and investment in the waste management sector.
- More effectively capturing high quality material that can go back into the Welsh economy to improve the resilience of our domestic supply chains and reduce reliance on extraction of raw materials.
- The job opportunities generated directly or indirectly will have wider social and health benefits. For example, employment is generally the most important means of obtaining adequate economic resources, which are essential for material wellbeing and full participation in today's society where work meets important psychosocial needs in societies where employment is the norm and is one of the main drivers of social gradients in health.

Costs and Savings

1.9 The sWEEE requirement is the latest phase of our successful workplace recycling reforms which collectively are modelled to deliver a cumulative net benefit of £194.6 million net present value (NPV) over 10 years from the combined package of measures⁶. The sWEEE phase of these reforms is expected to reduce CO₂e by 7,437 tonnes, reduce NO₂ by 6 tonnes and increase recycling by 37,757 tonnes over 10 years. The policy will also bring significant wider benefits, particularly in relation to an expected reduction in the number of waste fires caused by lithium-ion batteries found in many small electricals which may result in quite substantial additional savings.

1.10 These reforms will ensure that we can capture a resilient supply of high-quality recycled materials, which can then be returned into the economy. This in turn will help unlock the benefits of the circular economy and support business resilience through the transition to a decarbonised economy.

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

⁶ [Regulatory impact of options to increase workplace recycling](#) (2024).

Mechanism

- 1.11 The mechanism is secondary legislation – specifically 3 statutory instruments⁷. The sWEEE requirement is intended to be implemented via regulations that will amend The Waste Separation Requirements (Wales) Regulations 2023.

⁷ The Waste Separation Requirements (Wales) Regulations 2023, The Prohibition on the Incineration, or the Deposit in Landfill, of Specified Waste (Wales) Regulations 2023, The Prohibition on Disposal of Food Waste to Sewer (Civil Sanctions) (Wales) Order 2023.

SECTION 8. CONCLUSION

8.1 How have people most likely to be affected by the proposal been involved in developing it?

- 8.1.1 Throughout our extensive engagement the Welsh Government has actively involved businesses, public sector and third sector organisations, many of whom are interested groups and representatives of people with protected characteristics under the Equality Act 2010; Welsh speakers; children and young people; and other people who will be affected by these reforms.
- 8.1.2 Our engagement to-date includes more than a decade of consultation and engagement.
- 8.1.3 Collaboration with stakeholders has provided an opportunity for them to provide important input on the phasing in of certain waste streams including sWEEE. Relevant consultations include:
- **2009 *Towards Zero Waste* consultation.**
 - **2013-14 - *Environment Bill White Paper* consultation.**
 - **2019-2020 - Consultation on *Beyond Recycling, the Circular Economy Strategy for Wales*.**
 - **2019 Consultation on *Increasing Business Recycling in Wales*.**
 - **2022-23 Consultation on the draft Code of Practice and proposals for the Enforcement of Workplace Recycling.**
 - **2025 Consultation on proposed revisions to the Code of Practice:** our most recent consultation was a 12 week consultation (July – October 2025) on proposed amendments to the Code to reflect the previously consulted upon commitment to bring in the requirement to separate sWEEE (and not just unsold sWEEE) from non-domestic premises. All proposed amendments to the code put forward in the consultation were supported by the majority of respondents who expressed an opinion.

8.2 What are the most significant impacts, positive and negative?

- 8.2.1 These reforms will increase the quality and quantity of recycling from non-domestic premises in Wales. In doing so, this will represent a key step forward in Wales' commitment to reaching zero waste and net zero carbon emissions by 2050. In order to tackle the climate and nature emergencies, moving to a circular economy – where materials are kept in use and waste is avoided - is essential and an important element of being *a globally responsible Wales*. In line with the Welsh Government's Well-being

objectives⁸ the reforms directly support our Programme for Government commitment to build a greener economy based on the industries of the future and embed our response to the climate and nature emergency in everything we do.

- 8.2.2 A circular economy decreases our emissions and improves supply chain resilience, benefitting the economy and the environment as collected materials are fed back into the economy thereby reducing our dependency on raw materials extracted from overseas. This in turn reduces the associated damage to nature, biodiversity and the environment globally caused by the extraction and processing of the raw materials.
- 8.2.3 For individual businesses and organisations, the reforms support the move away from a situation where the disposal of waste is a significant cost, to one where that waste material is instead effectively captured and returned into our economy as important commodities. Alongside increased resource efficiency, this will also help to support business productivity and competitiveness in a decarbonising global economy. These reforms bring benefits by creating overall savings to the Welsh economy, securing higher prices for high quality materials captured, whilst creating opportunities to derive greater added economic value in Wales and creating additional jobs in the circular economy – crucial to *a more prosperous and resilient Wales*. The reforms also create alignment between the recycling behaviours of households and workplaces, improving consistency of the system for all users.
- 8.2.4 Through tackling the climate and nature emergencies, these reforms bring important environmental, economic and health benefits to people in Wales (a healthier Wales). People will benefit from reduced carbon emissions and recycling has become a point of national pride which generates opportunities to unite citizens (a Wales of cohesive communities, a Wales of vibrant culture) and by doing so creates opportunities for the Welsh Language.
- 8.2.5 For individual citizens, the regulations provide:
- less confusion and greater consistency in terms of what and how they recycle. In relation to recycling in the workplace, this will largely be the same as how they do it at home;
 - a greater sense of self-satisfaction / agency for their efforts to tackle the nature and climate emergencies;

⁸ “Programme for government 2021 to 2026: Well-being statement”, *Welsh Government*, 2021, <https://www.gov.wales/programme-for-government-2021-to-2026-well-being-statement-html>.

- greater empathy for their employers doing their bit.

8.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

8.3.1 The Welsh Government is taking an active role promoting biodiversity, children's rights, equalities and the Welsh language with these reforms.

8.3.2 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 regulations promote the shift to a circular economy, reducing resource extraction by capturing and feeding back materials into the economy, which helps to accelerate decarbonisation and reduce biodiversity loss. Continued action in this area is essential to our response to the climate and nature emergency, supporting the objective of embedding it in everything we do, whilst helping to build a stronger, greener economy as we make progress towards net zero and zero waste, creating a green and prosperous Wales for future generations.

8.3.3 The Welsh Government supports businesses to implement sustainable best practices through Business Wales, Food and Drink Wales, WRAP Cymru and the Biodiversity Partnership, and has developed sector-specific guidance on the implementation of these reforms, including the sWEEE requirement with WRAP. A variety of support tools are available to support businesses and organisations, such as best practice case studies, guides and downloadable signage and resources. To mitigate a potential increase in the use of diesel vehicles in the waste sector, the Welsh Government is assisting with the transition to greener vehicles with grants to local authorities for electric collection vehicles and charging infrastructure.⁹ Moreover, the negative impact of any increased trips and/or expansion to existing waste management facilities or new facilities is more than mitigated

⁹ "Local transport fund, resilient roads fund and ultra low emission vehicle transformation fund: guidance to applicants 2025 to 2026", *Welsh government*, 2024, [Local transport, resilient roads and ultra low emission vehicle transformation funds: guidance for applicants 2025 to 2026 | GOV.WALES](#) and "£15m 'boost' will increase the number of Welsh electric vehicle charging points", *Welsh Government*, 2023, <https://www.gov.wales/15m-boost-will-increase-number-welsh-electric-vehicle-charging-points>.

by the saving in emissions from the material substitution of the recycled material collected replacing raw materials.

- 8.3.4 There are no significant negative effects on the Welsh Government's statutory public sector equalities duties and implementation of the amended regulations will also be fully compliant with the Equality Act 2010. Large print, Braille and alternative language versions of all related documents are also available on request. All legislation, correspondence and publicity complies with the Welsh Language (Wales) Measure 2011. The reforms contribute towards a more equal Wales as they bring about positive action to address the climate crisis which is anticipated to hit the most vulnerable communities hardest. It will also create a cleaner, greener and more sustainable environment with associated jobs and investment in the circular economy. The Welsh Government is working to minimise any cost impact on micro and small-businesses with under 20 employees, which are the only businesses predicted to face a very small increase in costs,^{10,11} by, for example, providing tools and advice on how to reduce overall waste, optimise waste collection services and supporting Local Authority co-collection of household and non-domestic waste where appropriate. All other businesses are predicted to make savings.
- 8.3.5 The Health Impact Assessment concludes that, overall, the circular economy approach (which underpins the regulations) will have a positive impact on the wider determinants of health and wellbeing for the general population. In particular, through reduced emissions of CO₂ and NO₂ and mitigating the impact of climate change, which is disproportionately harmful for certain groups.
- 8.3.6 Children and young people are stakeholders indirectly affected by these reforms who will reap the many positive benefits. 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 early in our future thinking and influence positive behaviour change and creative thinking amongst our next generation.
- 8.3.7 We have provided 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. In addition, Welsh Government is taking action to promote

¹⁰ "RIA, *Welsh Government*, 2023, Table 22.

¹¹ [Regulatory impact of options to increase workplace recycling](#), 2025, Table 6

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.

8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

- 8.4.1 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. The intended electronic waste tracking system will be used as a primary data source to track recycling levels for industrial and commercial waste in Wales when available (c. 2027). The initial phase will be mandatory for receiving site operators only from October 2026.
- 8.4.2 In addition, a number of other data sources that will be used in the interim include: WasteDataFlow, National Resources Wales (NRW) compliance assessment data, NRW waste industrial and commercial waste surveys, NRW 'site return' data, Waste Compositional Analyses and surveys.
- 8.4.3 The outcomes relating to 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 number of premises inspected disposing of food waste to sewer.
- 8.4.4 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. Moreover, qualitative and quantitative data gathered during the NRW and LA inspections of non-domestic premises and waste handlers will further provide information about the impacts of the regulations on businesses.