



Cabinet 26 June 2018

Appendix 4

HWRS Service Review

Charity Waste Permit Scheme Review

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Executive Summary

- a) The East Sussex Charity Waste Permit Scheme is currently used by 102 charities including large furniture reuse organisations, charity shops, social care and education providers, independent schools, churches, meeting halls and environmental organisations. It is estimated that they deliver 1,021 tonnes of waste to the County Council at a cost of £141,473 per annum.
- b) The Environmental Protection Act 1990 and Controlled Waste Regulations 2012 means that the County Council does not have a legal obligation to accept charity waste free of charge at waste transfer stations or household waste recycling sites.
- c) Eight furniture reuse charities account for 59% of overall tonnage. Free waste disposal via the permit scheme is seen as a crucial part of their business model. There is some evidence that they contribute significantly to reuse of waste – and this is likely to result in a net saving for the County Council. However, there is scope to improve how reuse data is recorded and shared.
- d) There may be scope to realise savings by developing a more formal approach to screening Contract Waste for furniture and items for reuse. Every additional tonne of bulky waste diverted from landfill could save the County Council approximately £48 in waste disposal costs. However, this is dependent on the availability of suitable storage and logistics as well as there being enough good quality material in the waste stream to justify the effort. Existing contractual arrangements with waste collection and disposal contractors should also be reviewed when considering working with charities on a more formal basis.
- e) Approximately 70% of current permit holders are charities that have links to County Council services, particularly those in Adult Social Care & Health and Children's Services. Some of these charities are directly contracted to provide services to vulnerable groups. Most permit holders are local organisations or have strong local or regional connections. Raising income through charity shops and furniture reuse is seen as increasingly vital in light of recent reductions in public sector funding for the voluntary and community sector.
- f) Many permit holders use their permits to dispose of fly-tipped waste on premises such as outside charity shops and as well as open spaces managed by the charity. Fly-tipping is difficult to prevent and would be a drain on the resources of charities if not for the permit scheme.
- g) There is weak evidence to suggest that charity permits are being used to import significant quantities of waste into East Sussex to take advantage of free waste disposal. It is hoped that some neighbouring local authorities operate similar policies for charity waste acceptance.

1. Review Aims

1.1 The aims of the review are:

- To explore opportunities to work with charities to increase the reuse of waste – to support achieving the Waste Hierarchy;
- To understand the contribution made by the scheme to the business model of charities that sell second-hand furniture and bric-a-brac to generate income;
- To understand the role the scheme plays in helping the voluntary and community sector to dispose of waste generated by their activities;
- To explore the extent to which local charities in East Sussex are the main beneficiaries;
- To consider whether the current scheme contains sufficient controls to minimise misuse of permits; and
- To evaluate whether offering unlimited free waste disposal to any charity in the county is a cost-effective way of delivering these aims.

2. Current Practice

- 2.1 Any registered charity or place of worship may apply for and be granted a permit to use one of the County Council's waste facilities free of charge to dispose of their waste. Scheme administration is carried out by Veolia on behalf of the County Council.
- 2.2 Charity permit holders are responsible for bringing their waste to a facility provided that they comply with site rules covering waste acceptance, vehicle type and health & safety. It is requested that charities sort their waste before coming to site to maximise the amount of recycling. The permit does not entitle the charity to free collection of waste by the Waste Collection Authority (WCA) nor is non-household waste such as hardcore, soil, tyres, plasterboard and asbestos accepted from charities.
- 2.3 Whilst the majority of charity permit holders use their nearest HWRSs to dispose of waste, larger charities with significant quantities of waste are directed to Waste Transfer Stations (WTS). This is also the case at Hastings HWRS where due to the high numbers of customers at the site, all charities are asked to use the neighbouring WTS.
- 2.4 The larger charities generally deliver waste in vans and may contract a commercial collection service for this purpose. Smaller charities often rely on volunteers using their own vehicles to bring waste to sites.
- 2.5 From time to time, the County Council receives requests from local groups and town and parish councils to dispose of waste from community litter picking events. These groups are not usually registered charities, but permission is often granted on a discretionary basis for an agreed period of time.
- 2.6 Charities are not required to register with the Charities Commission if its annual income is less than £5,000, or if it is an organisation exempt from registering such as a church or a Scout or Guide group. Under current arrangements, all places of worship and Scout and Guide groups are granted permits. Permit requests from small, unregistered charities are rare and it is thought that smaller charities and

groups generally dispose of their waste through household bins or by bringing it to HWRSs without declaring it as charity waste.

- 2.7 The East Sussex Charity Waste Permit Scheme is not publicised on the County Council's website and it is not promoted to the voluntary and community sector.

3. Statutory Obligations

Environmental Protection Act (EPA) 1990

- 3.1 Many local authorities believe – and internal legal advice obtained supports this view, that there is no legal obligation to accept waste from charities at HWRSs or transfer stations, even if the cost of disposal can be recovered. Under s51 of the EPA 1990, Waste Disposal Authorities (WDA) have an obligation to accept (i) controlled waste collected in its area by Waste Collection Authorities (WCA), and (ii) to provide places at which persons resident in its area may deposit their household waste for disposal. A charity is not a WCA or a “person resident in its area” meaning that there is no obligation to accept waste from charities under the EPA 1990.
- 3.2 Some WDAs have used this argument to refuse all charity waste inputs regardless of the type of charity. The only charity waste accepted by these local authorities is charity waste collected by WCAs and delivered to a transfer station.

Controlled Waste Regulations (CWR) 2012

- 3.3 CWR 2012 is used in conjunction with the EPA 1990 to classify waste as household, commercial or industrial waste. The regulations also govern whether local authorities can charge for collection and disposal of the waste depending on the type of premises and/or activity. A summary of the CWR 2012 classifications that typically apply to charities is included in Appendix 1.
- 3.4 Waste is classed as household waste under CWR 2012 if it is from a charity shop or a charity or community interest company involved in the reuse of domestic waste. Despite the designation as household waste, under CWR 2012 a WCA may charge a charity to collect waste from these types of premises. However, the WDA cannot add their disposal cost onto the collection charge.
- 3.5 The entitlement to free waste disposal only applies if the charity is involved in the reuse of goods donated from domestic premises, or if the premise is a place of worship or used for public meetings. Waste of a non-domestic nature from charity premises (e.g. office space, workshops, studios and open spaces) is classed as commercial waste and can be charged for both collection and disposal. Waste from premises used for the boarding or stabling of animals (e.g. cat rehoming centres) is classed as industrial waste and can also be charged for both collection and disposal.
- 3.6 This means that under CWR 2012, charitable status or classification of waste as household waste does not automatically entitle the organisation to free disposal of waste.
- 3.7 As far as we are aware, the law has not been tested to determine whether classification under CWR 2012 has any bearing on the EPA 1990 right to access HWRSs or transfer stations. On this basis, we believe that the County Council has discretion to refuse charities access to waste facilities.
- 3.8 Extracts of the relevant parts of the EPA 1990 and CWR 2012 are included in Appendix 1.

4. Estimated Usage

- 4.1 The current number of permit holders and their estimated tonnage and disposal cost is shown in table 1 below. Transfer station tonnage is based on weighbridge data. HWRSs usage is estimated because these sites do not have weighbridges. Instead, usage is estimated on the expected frequency of visits stated by charities on their permit application form.

Table 1: Permit usage by waste facility

Facility	No. permit holders	Estimated tonnage	Estimated disposal cost (2018/19) ²
HWRSs ¹	49	332	£46,026
Eastbourne WTS	30	302	£41,886
Maresfield WTS	3	8	£1,147
Pebsham WTS	20	378	£52,411
All facilities	102	1,021	£141,473

¹ Excluding Eastbourne and Hastings HWRSs where all permit holders use the WTS at these sites. Charities at Maresfield can use either the HWRS or WTS depending on their volume of inputs.

² Disposal cost is based on estimating the likely split of landfill, recovery and recycling. Bulky waste such as furniture is generally landfilled.

5. Current Permit Holders

- 5.1 There are currently 102 permit holders from a wide range of sectors such as charity shops, furniture reuse organisations, social care providers, community centres, independent schools, environmental trusts and places of worship. The full list of current charity permit holders is included in Appendix 2.
- 5.2 The eight largest charity permit holders, based on estimated tonnage, are shown in table 2 below. These charities are all furniture reuse organisations and account for 59% of the estimated tonnage. Large charities sometimes hold multiple permits because permits are issued for a specific site in East Sussex, rather than for all premises managed by the organisation. This is intended to prevent charities from using the permit to bring waste into East Sussex from their premises outside of the county.

Table 2: Estimated usage of the largest permit holders

Charity permit holder	No. permits held	Estimated annual tonnage
British Heart Foundation	4	160
Emmaus Hastings and Rother	1	85
Age UK East Sussex	3	79
St Wilfrid's Hospice	1	77
The Sara Lee Trust	1	63
Hastings & Rother Voluntary Association for the Blind	1	59
Cats Protection	4	41
Furniture Now	4	39
Largest 8 charities	19	602
All other charities	83	419
Total	102	1,021

6. Furniture Reuse Charities

- 6.1 The business model of these charities is based on reselling donated goods collected from domestic sources such as furniture and bric-a-brac. These charities collect items to sell in shops or offer the items free of charge to people in need. Some charities PAT test electrical items and offer them for sale or donate them to vulnerable groups. Unsold and damaged items are tipped using the charity permit. In at least one case, the charity is selling unsold textiles and books to a third party to maximise their income.
- 6.2 Furniture reuse by charities makes an important contribution to waste management by reusing items that would otherwise end up in the local authority waste stream. One charity shared data to illustrate that 89% of the estimated 945 tonnes of domestic waste collected annually was being reused. This is a significant contribution towards the Waste Hierarchy. The latest Annual Report for this charity indicates that they typically collect from over 6,000 households in East Sussex per annum. The saving in the County Council's disposal costs from this one charity alone is in the region of £125,000¹ per annum. No other charity was able to provide this level of information.
- 6.3 The offer of free collection by many charities makes furniture reuse an attractive option for many residents, particularly those that do not own a car or are unwilling to pay for local authority bulky waste collection.
- 6.4 The charities we spoke to said that they rely heavily on their charity waste permit due to the cost of disposing of waste through private waste companies and the rising cost of Landfill Tax. We were told that the margins in the furniture reuse sector are small and that the permit scheme is vital for this to be a viable way of generating income. This has grown in importance in recent years as charities recognise the need to reduce their reliance on public sector funding for their activities.
- 6.5 A major challenge for re-use charities is the variable quality of domestic goods donated to them by the public. Charities we spoke to said that they have a clear idea of the type and condition of goods that will sell in their shops. This is particularly important for charities that lack warehouse storage space or have limited space on the shop floor. Charities will usually decline to collect items that are damaged, heavily worn, soiled or outdated. However, the acceptance criterion is subjective and can vary between charities. There is noticeable frustration amongst charities that the public often believe that charities will accept second-hand goods regardless of their condition and usability.
- 6.6 A number of charities mentioned that a significant proportion of their waste is items that have been fly-tipped outside their shops. This material is often in poor condition or has been exposed to the weather making it unsuitable for resale.
- 6.7 Some charities are exploring new revenue streams by branching out into office furniture reuse. This is commercial waste that would not normally be the responsibility of County Council. One charity is working with local universities to reuse items discarded by students in halls of residence. Whilst waste from premises forming part of a university is classified as household waste, local authorities are allowed to charge for collection and disposal of this waste under CWR 2012.
- 6.8 A number of charities asked whether it is possible to work with local authorities in East Sussex to reuse furniture and bric-a-brac found at HWRSs and in bulky waste collections. There is currently no formal mechanism to allow charities to screen out items for reuse in the local authority waste stream

¹ This is on the basis that when residents deal directly with charities, the County Council does not incur any costs because the waste is not being processed through the Integrated Waste Management Services Contract (IWMSC).

before the waste is sent for energy recovery or landfill. The only reuse at East Sussex HWRSs is through the reuse shops found at the majority of sites.

- 6.9 There is however, a long-standing arrangement at Hove HWRS whereby the reuse shop is operated by YMCA. At East Sussex HWRSs, the reuse shops are operated by Veolia staff and the income used to support the running of the site.
- 6.10 Establishing a new arrangement with charities to promote will require co-ordination with Veolia who contractually own any waste deposited at IWMSC facilities. This means the saving from diverting Contract Waste from landfill to reuse is lower compared with when a member of the public deals directly with the charity. Every additional tonne of bulky waste diverted from landfill could save the County Council approximately £48 in waste disposal costs.
- 6.11 The following aspects will need to be considered if the benefits of working with charities are to be realised:
- Whether there is sufficient quantity of good quality furniture present in bulky waste collections or at HWRSs to make it worthwhile screening the waste for items that can be reused by charities. Good quality material is likely to have already been lost to collection by charities or to ebay/Facebook Marketplace;
 - Storage space (ideally undercover) for furniture and items awaiting screening and collection by charities;
 - The selection of one (or more) charity partners to work with the County Council and Veolia to promote reuse on a more formal basis;
 - Weighing material reused by charities at HWRS sites where there is no weighbridge;
 - Opportunities to establish a similar relationship at Brighton & Hove sites, where the idea of a 'reuse depot' has been suggested by a local group; and
 - The impact on HWRS reuse shops.

7. Services provided by Charity Permit Holders

- 7.1 Table 3 below shows the extent to which charity waste permit holders are directly contributing towards delivering the County Council's strategic priorities. These priorities are:
- Keeping vulnerable people safe;
 - Helping people to help themselves;
 - Driving economic growth; and
 - Making best use of resources.

Table 3: Alignment between ESCC strategic priorities and the charitable objectives of permit holders

Link to ESCC strategic priorities	No. permit holders	% of tonnage
Charity is contracted to provide services, grant funded or is a supplier to ESCC	19	20%
Closely aligns but not directly funded	44	50%
Indirect link	12	10%
No clear link	27	21%
Total	102	100%

- 7.2 In at least 19 instances (possibly more), the charity is directly contracted or grant funded by the County Council to provide services to vulnerable groups and their carers. Age UK for example, currently holds three contracts with ESCC for services relating to home from hospital care and day care provision. Adult Social Care alone currently funds 61 different charities so the number of charities contracted by ESCC is far higher than the actual number of permit holders.
- 7.3 There are 44 charity permit holders that are not currently directly funded by ESCC, but are involved in providing services that are closely aligned with the County Councils strategic priorities. Examples of these include organisations that provide support for people with physical and learning disabilities, support for carers, mental health services, training and skills provision, hospices and foodbanks.
- 7.4 South Downs Housing Association and Community Housing & Therapy are examples of charity permit holders that provide supporting housing support for vulnerable people including people with mental health, learning and physical disabilities. In both cases, the amount of tonnage is thought to be small and is typically large bulky items such as furniture, electrical items and fly-tip. South Downs Housing Association is set up as Industrial and Provident Society (ISPs) rather than a charity so it is unclear whether organisations of this nature should be treated the same as charities.
- 7.5 There are at least 16 charity permit holders that are organisations included in the “Local Offer” for East Sussex. The Local Offer is a published list of services available to support children and young adults who are disabled or have Special Educational Needs (SEN) and their families.
- 7.6 Furniture Now and Emmaus are good examples of charities that use the proceeds from furniture reuse to fund training and support for people who are long-term unemployed or homeless. Furniture Now provides furniture and essential household items to people being rehomed (e.g. people fleeing domestic violence) in conjunction with district and borough councils and housing associations. Emmaus provides accommodation for homeless people who work in their workshop and warehouse to help them back into mainstream society and employment.
- 7.7 Following dialogue with Adult Social Care and Children’s Services, it is clear that a significant proportion of charity permit holders are important service providers that play a key role in supporting and representing disadvantaged groups in East Sussex.
- 7.8 Around one-third of charity permit holders are organisations where the link to the County Council’s strategic priorities is less clear. Examples of these include some animal/wildlife related charities, independent schools, outdoor activity centres, places of worship and charities that support projects abroad. Some of these charities provide work placements for school students. The largest charity in this group is British Heart Foundation; a national charity that funds medical research.

8. Independent Schools

- 8.1 There are currently four independent schools with charitable status that currently hold a Charity Waste Permits. These organisations are understood to use their permits to dispose of the occasional bulky item such as furniture, equipment and electrical appliances. Day to day disposal of waste is provided by a waste collection arrangement with the commercial sector. Waste disposal contractors normally charge extra to take bulky items or refuse to take them, so the permit is a convenient way of disposing of these items. Tonnage for the four schools is estimated at no more than 12 tonnes per annum.

- 8.2 Given that independent schools are generally well resourced, they are arguably not a high priority for providing assistance with free waste disposal. As an alternative, we are keen to encourage independent schools to work with furniture reuse charities as there may be scope to reuse furniture discarded by the school, such as furniture and domestic items from boarding quarters.
- 8.3 We are keen to distinguish between independent schools that provide mainstream schooling to fee paying students, from those that provide specialist education services to vulnerable groups. One example of this is Chailey Heritage School (part of the Chailey Heritage Foundation) that provides specialist education services, residential and day care to children and young adults with complex learning and physical disabilities.

9. Places of Worship and Meeting Halls

- 9.1 Use of charity permits by churches and village/community halls is surprisingly rare given how many there are in the county (400+). There are relatively few with charity permits (eight churches and seven village/community centres) because most have waste collected free of charge by their WCA because of the classification of their waste as household waste in CWR 2012. Charity waste permits seem to be used to dispose of furniture, fly-tip and grounds maintenance waste. There are also two examples of churches that use their permit to dispose of waste from foodbanks operating at their premises.

10. Countryside Management and Animal Rescue Charities

- 10.1 There are charity permit holders who are organisations responsible for land management of nature reserves. These organisations typically use their permit to dispose of litter and fly-tip from their land and visitor car parks. The Ashdown Forest Trust is the best known example and is a registered charity controlled and managed by East Sussex County Council.
- 10.2 Fly-tip is a significant challenge in the Ashdown Forest due to the size of the AONB and the number of car parks and lay-bys that they are responsible for. Forest Rangers dealt with a total of 83 serious fly-tip incidents between 2015/16 and 2017/18. In serious cases, a contractor is brought in to collect and dispose of the fly-tip at a commercial waste facility.
- 10.3 There are four examples of charity permit holders where the main focus is to care for abandoned pets or injured wildlife. Their waste typically consists of used bedding, cat litter and other boarding related waste. Under CWR 2012, this waste is classed as industrial waste and would not normally be the responsibility of the County Council.

11. Commercial Sub-contractors

- 11.1 A further consideration is whether the waste has arisen from a commercial contractor carrying out works or services on behalf of a charity. Examples of this include grounds maintenance, cleaning and haulage contractors. Many charities employ their own drivers, but at least one uses a commercial contractor. Whilst it is questionable whether it is fair that a commercial enterprise benefits from the charity permit, there are some operational benefits from using a dedicated haulage operator with the correct licences. However, there is a risk of non-charity waste being mixed with charity waste and brought to the County Council's facilities.

12. Out of County Waste

- 12.1 It is a requirement of the existing permit scheme to only accept waste that has arisen at premises or activities in East Sussex. It is difficult to enforce this rule because a visual inspection of the waste is inadequate to determine its origin. A site visit to the charity's premise may help to reduce this risk, but it is resource intensive to undertake visits on a routine basis. This is a risk because larger charities with operations across the region could potentially import waste into East Sussex to take advantage of free waste disposal.
- 12.2 However, this risk is thought to be low because many of the larger charities operate either as an East Sussex entity (Age UK East Sussex) or each shop operates as a standalone business unit with its own haulage (British Heart Foundation). However, there is one charity that operates a warehouse near the border with West Sussex where the risk of out of county waste will be much higher.
- 12.3 Table 4 below shows the breakdown of charities according to whether they are predominantly East Sussex based, or whether they have a regional, national or even international reach. Many of the regional charities are pan-Sussex or cover East Sussex and Kent (the Weald). This table shows that about three-quarters of charity permit holders have a strong local connection.

Table 4: Geographic reach of current permit holders

Geographic reach	No. permit holders	Tonnage %
East Sussex	65	63%
South East	16	11%
National	19	25%
International	2	1%
Total	102	100%

- 12.4 Defining a charity as local or national is not straightforward or necessarily informative. Some charities that are locally based (e.g. Age UK East Sussex) are part of a wider network of 150 separate organisations under the Age UK umbrella. Likewise, Scout and Girl Guide/Brownie groups are local chapters registered as East Sussex entities, but are affiliated with the national charity. Many charities that are national entities have premises in East Sussex where local services are provided, for example Fitzroy Support in Newhaven, The Disabilities Trust in Eastbourne and RNLI in various locations.
- 12.5 Arguably, there are just two charities with permits that do not benefit East Sussex residents in some way – two very small charities that fundraise locally to support orphanages and animal rescue centres abroad.
- 12.6 It is also helps that the local authorities directly bordering East Sussex operate similar charity waste acceptance policies. A summary of the policies of neighbouring local authorities is shown below in table 5.

Table 5: Charity waste policies of local authorities in the South East

Local authority	Charity waste policy
Brighton & Hove City Council	<ul style="list-style-type: none"> - Charities are issued with a limited number of permits for non-recyclable waste. - Each permit allows one visit to Hove HWRS to dispose of non-recyclable waste. - Unlimited visits for recyclable waste. - No access to Brighton HWRS or Hollingdean WTS. - Scheme is administered by BHCC separately to the ESCC permit scheme
Kent County Council	<ul style="list-style-type: none"> - Any charity may register in advance for permission to bring waste to a transfer station. - The charity is issued with a limited number of dockets with each docket allowing one visit.
Hampshire County Council	<ul style="list-style-type: none"> - Waste from charities is not accepted at any facility.
Surrey County Council	<ul style="list-style-type: none"> - No formal policy, but current practice is to accept local and small charities that reuse domestic waste where the waste originates in the county and only if the charity is run by volunteers. - Charities may only use selected transfer stations and not HWRSs. - Limited to 12 visits per year for each reuse organisation
West Sussex County Council	<ul style="list-style-type: none"> - Any charity or community group may register for permission to dispose of waste from their charitable work. - Charity waste is only accepted at Burgess Hill, Westhampnett or Crawley Transfer Stations.

13. Non-household Waste

- 13.1 Non-household waste is typically construction and demolition waste originating from building maintenance and fly-tip such as tyres, oil canisters and asbestos. Some charities have said that whilst large quantities of construction and demolition waste can be disposed of by hiring a skip, it is difficult to dispose of smaller amounts from minor repairs because hiring a skip is excessive for this quantity of waste. It is current policy to not allow construction and industrial waste from any charity permit holder on the grounds that it is not the statutory duty of local authorities to take this type of waste from residents or charities.
- 13.2 If charging for non-household waste is introduced, then charities could be allowed to bring construction and demolition waste from small DIY projects to HWRSs, provided that they pay the charge for disposal.

14. Charity Waste Data

- 14.1 It is a common theme in this review that there is scope to improve the collection of data about charity waste, particularly in the following areas:

- The recording of the charity's name on weighbridge tickets – this is a free text box so the name is not always recorded in a consistent manner;
- HWRS usage by charities e.g. their frequency of visit or estimated tonnage. This practice should be reviewed given the Duty of Care requirements for waste transfer notes;
- The amount of waste collected by charities from residents and reused – to help with tracking the amount of domestic waste that is reused and estimating the benefit of the avoided cost to the East Sussex County Council waste budget;
- Whether the waste originates from domestic or non-domestic properties;
- The amount of waste that originates from premises located outside of East Sussex; and
- The quantity of charity waste that is recycled, incinerated or landfilled.

14.2 Data recording could be improved by making it a requirement for permit holders complete documentation at HWRSs and to report information about the source of their waste and their reuse activities on a regular basis to the County Council.

15. Conclusions

15.1 Charity permits are important for furniture reuse charities by providing a means of disposing of items that they have attempted to reuse but are unable to do so. Many charities lack space on the shop floor or warehouse to store items that they are unable to resell. Without a permit scheme, many charities would be less inclined to take the risk of collecting items that are not guaranteed to sell. This will limit the throughput of material handled by furniture reuse charities. Local residents unable to take their waste to HWRSs also benefit from having charities willing to collect unwanted domestic items for free.

15.2 It would normally be the responsibility of County Council to dispose of most of this waste so there are clear financial benefits from supporting charities in this way. Whilst data on reuse by charities is limited, the level of saving under the existing scheme could be significant and should be investigated further to balance against the cost of the permit scheme.

15.3 There is currently no formal arrangement for working with charities to reuse furniture collected by WCAs or brought by the public to HWRSs. Waste reused by charities is generally through their own efforts to publicise their service and deal directly with local residents. Whilst this approach is generally successful, there may be scope to increase reuse further by giving furniture reuse charities access to local authority waste streams. This should be explored further to understand the feasibility, potential savings and contractual implications of inviting charities to work with waste collection and disposal contractors on reusing waste.

15.4 There is an opportunity to promote reuse by working with furniture reuse charities in a more formal way. Every additional tonne of bulky waste diverted from landfill could save the County Council approximately £48 in waste disposal costs. But this is highly dependent on there being sufficient quantity of good quality items suitable for reuse. Logistics such as suitable storage space and haulage arrangements will also need to be considered. The contractual arrangement with local authority waste collection and disposal contractors would also need to be understood.

15.5 We estimate that 63 out of 102 current permit holders are either important service providers for the County Council or provide services to vulnerable groups that are priorities for Adult Social Care & Health and Children's Services, and to a lesser extent, Communities, Economy & Transport. These charities account for 70% of the estimated tonnage.

- 15.6 For many charities, maximising income from furniture reuse is a key part of the business plan of some charities in their effort to reduce reliance on local authority funding. Major changes to the permit scheme could present a risk of adversely affecting service providers in the voluntary and community sector.
- 15.7 39 of the 102 existing charity permit holders are organisations with charitable aims that do not closely align with the County Council's strategic priorities in terms of helping vulnerable groups. These charities are estimated to deliver approximately 315 tonnes of waste per year. Approximately two-thirds of this is from British Heart Foundation and Cats Protection whose waste is generated from the reuse of domestic waste. This leaves a mixture of private schools, animal rescue/rehoming centres, charities that support projects abroad, places of worship and community facilities.
- 15.8 Many charities use their permits to dispose of fly-tipped waste, such as poor quality items left outside charity shops, or fly-tip and litter found on open spaces managed by the charity. Fly-tipping is detrimental to the environment and would be a drain on a charity's resources if not for the ability to dispose of this waste free of charge through the permit scheme.
- 15.9 There is a risk that some smaller charities, particularly those led by volunteers, will resort to using household bins or unauthorised use of HWRSs to dispose of waste if their permit is withdrawn.
- 15.10 A number of furniture reuse charities are using their permits to dispose of waste from commercial premises. It is acknowledged that commercial furniture is growing in importance for some charities as a way of generating income, but the County Council is not responsible for disposing of this waste.
- 15.11 Charities are currently not allowed to dispose of construction and demolition waste using their permits. This restriction could be relaxed if charging for non-household waste is introduced as charities could pay for this waste.
- 15.12 There is scope to improve how data is captured at transfer stations and HWRSs to give better clarity about how permits are used. It could also be made a condition of the permit that the larger furniture reuse charities report data on collection and reuse to help evidence the extent to which waste is being diverted from landfill and measure the associated benefit to East Sussex County Council.

Appendix 1: Key Legislation

Extract from the Environmental Protection Act (1990)

51 Functions of waste disposal authorities.

(1) It shall be the duty of each waste disposal authority to arrange—

(a) for the disposal of the controlled waste collected in its area by the waste collection authorities; and

(b) for places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited;

Extract from the Controlled Waste Regulations (2012)

Description	Waste classification	Can WCAs charge for collection?	Can WDAs charge for disposal?
A charity shop selling donated goods originating from domestic property	Household waste	Yes	No
Waste from premises occupied by a CIC or charity which collects goods for reuse or waste to prepare for re-use from domestic property	Household waste	Yes	No
Premises occupied by a charity and wholly or mainly used for charitable purposes	Commercial waste	Yes	Yes
A place of worship	Household waste	No	No
Premises used wholly or mainly for public meetings	Household waste	Yes	No
Waste from premises forming part of a university, school or other educational establishment	Household waste	Yes	Yes
A residential home or land belonging or wholly or mainly used in connection with a residential home [residential = care home]	Household waste	Yes	Yes
Waste from premises used for the breeding, boarding or stabling of animals	Industrial waste	Yes	Yes

Appendix 2: Current Charity Permit Holders (May 2018)

Controlled Waste Regulations 2012 classification	No. permit holders	Estimated annual tonnage
A charity shop selling donated goods originating from domestic property	20	444
Waste from premises occupied by a community interest company or charity which collects goods for reuse or waste to prepare for re-use from domestic property	10	236
Premises occupied by a charity and wholly or mainly used for charitable purposes	41	225
A residential home [i.e. a care home] or land belonging or wholly or mainly used in connection with a residential home	8	30
Premises used wholly or mainly for public meetings	7	27
A place of worship	8	26
Waste from premises used for the breeding, boarding or stabling of animals	4	21
Waste from premises forming part of a university, school or other educational establishment	4	12
Total	102	1,021

Charity shops selling donated goods originating from domestic property

- Age UK East Sussex – Eastbourne
- Age UK East Sussex – Polegate
- British Heart Foundation Eastbourne (202 Terminus Rd)
- British Heart Foundation Eastbourne (165 Terminus Rd)
- British Heart Foundation Hastings (12 Wellington Place)
- British Heart Foundation Hastings (White Rock)
- Cats Protection (14 Seaside Rd) – Eastbourne
- Cats Protection (120 Seaside Rd) – Eastbourne
- Demelza House – Eastbourne
- Eastbourne Christian Resource Centre
- Friends of Crowborough
- Furniture Now – Hailsham
- Hospice In the Weald – Five Ashes
- PDSA – Eastbourne
- PDSA – Newhaven
- Salvation Army Charity Shop – Eastbourne
- Samaritans Retail Ltd – Eastbourne
- St Peter & St James Hospice Shops Ltd – Lewes
- The Martlets Hospice – Peacehaven
- The Sara Lee Trust – Hastings

Charity or community interest companies that collects goods for reuse from domestic property

- Age Concern Eastbourne – Eastbourne
- Age UK East Sussex Newhaven – Newhaven
- Cats Protection (Warehouse) – Chelwood Gate
- Emmaus Hastings and Rother – St Leonards On Sea
- Furniture Now Eastbourne (Britland) – Eastbourne
- Furniture Now Eastbourne (Courtlands Road) – Eastbourne
- Furniture Now – Lewes

- Hastings Furniture Service Ltd – Hastings
- Pegasus Children's Project (Tribal Earth) – Enfield
- RSPCA – Fairlight
- St Wilfred's Hospice Furniture Centre – Eastbourne

Other premises occupied by a charity

- 1066 Gymnastics – Bexhill-on-Sea
- 1st Wadhurst Brownies – Ticehurst
- 9th Bexhill Scout Group – Bexhill-on-Sea
- Activate Fairlight Youth Club – Fairlight
- Age UK – Worthing
- Ashdown Forest Trust – Forest Row
- Autism Sussex Ltd – Battle
- Battle District Girl Guides – Battle
- Bexhill Caring Community – Bexhill-on-Sea
- Bowles Rocks Trust – Eridge Green
- Burwash and Etchingam Scout Group
- Care for the Carers – Eastbourne
- Chailey Brownies
- Churches together in Bexhill
- Childs Charitable Trust – Eastbourne
- Computers for Charities – Hailsham
- East Sussex Hearing Resource Centre – Eastbourne
- Eastbourne and District Mencap (Pevensey Road)
- Eastbourne Foodbank
- Friends of Old Town Library – Eastbourne
- Hailsham Foodbank
- Hastings Foodbank
- Hastings & Rother Voluntary Association for the Blind – St Leonards On Sea
- Hastings Advice & Representation Centre – St Leonards On Sea
- Headway East Sussex – Newick
- House Project Centre – Peacehaven
- International Animal Rescue – Uckfield
- Kingdom Way Trust – Eastbourne
- Lewes & District Visual Arts Association – Lewes
- Newhaven Community Development Association – Newhaven
- Ouse & Adur Rivers Trust – Lewes
- Project Art Works – Hastings
- RNLI – Hastings
- Scope – Hastings
- Southdown Housing Association – Lewes
- The Disabilities Trust – Langney
- The Kit Wilson Trust – Uckfield
- The Oyster Project – Lewes
- Weald Society for the Disabled – Ashford
- YMCA Downslink – St Leonards on Sea

Residential care homes / social care support

- Bernhard Baron Cottage Homes – Polegate
- Bevern Trust – Lewes
- Children's Respite Trust – East Hoathly
- Community Housing and Therapy – Eastbourne
- Eastbourne & District Mencap (Greensleaves)
- Eastbourne and District Mencap (Arundel Rd)
- Fitzroy Support – Newhaven
- Order of St Augustine of the Mercy of Jesus – Ditchling Common
- Chailey Heritage Foundation

Independent schools

- Battle Abbey School
- St Andrews Prep School – Eastbourne
- St Bede's School Trust – Eastbourne
- St Bede's School Trust – Hailsham

Premises used for the breeding, boarding or stabling of animals

- RSPCA Mallydam Wood – Fairlight
- Caring for Cats – Eastbourne
- Cats Protection (Cattery) – Chelwood Gate
- Seahaven Wildlife Rescue – Newhaven

Public meeting halls

- Blackboys Village Hall & Allotments
- Cooksbridge Recreation Committee
- Community Wise – Eastbourne
- Hillcrest Community Partnership – Newhaven
- Langney Village Hall – Eastbourne
- Saltdean Community Association
- South Heighton Village Hall – Newhaven

Places of worship

- Chichester Diocesan Fund and Board of Finance – Seaford
- Community Church Eastbourne – Pevensey Bay
- Crowborough Community Church
- St Nicolas & St Wilfrid's Pevensey Parochial Church Council
- St Thomas Church – Groombridge
- The Christian Trust – Stone Cross
- The Church of The Holy Cross – Uckfield
- The Parochial Church Council of the Ecclesiastical Parish of All Saints Eastbourne