



RD/MK/TR

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Always a place of light and love

2nd March 2017

Dear Kenton

Re: Waste Disposal and Reuse Credits for Charity Chops Consultation

We are writing in response to your letter received on the 3rd February advising that the council is considering ceasing to provide free waste disposal to charity shops in Herefordshire, a service that the Council has operated to mutual benefit, very successfully with St Michael's Hospice for more than fifteen years.

We would like to thank you for your time, prompt and helpful responses since notification, and appreciate the opportunity to comment prior to a final decision being made. As your letter suggests we will respond to your two proposals separately.

1. Proposal to remove the free Disposal Service

St Michael's Hospice is a registered Charity which operates 18 charity shops throughout the County of Herefordshire. The money we raise from our shops goes to support the Specialist Palliative and end of life care we provide free of charge to local people. Currently one in four of our patients and their families are funded by donations through our shops.

The two principle reasons cited by the Council for ceasing free tip permits, namely the cost to the tax payer, and encouraging more waste to go to landfill by rewarding poor behaviour, we believe is wholly flawed in its logic. Unlike some charity shops, all of our shops are stocked entirely from donated goods, the overwhelming majority of which are donated from within the County. With a chain of shops St Michael's is able through efficient warehousing, rotation and distribution to re-use or resell the overwhelming majority of items donated to us by local residents who want to support our cause. As a whole the charity shop sector is able to sell or recycle around 96% of donated clothes and 97% of books. (Source charity Retail Association). We believe the removal of free tip permits would be counterproductive when you consider how much the Charity Retail Sector saves local authorities

in waste disposal costs. If charity shops such as ours did not exist a significant percentage of the goods donated would fall as a burden on the Council to collect and dispose of. We believe the cost of this to the Authority would far higher than the current cost of free tip permits. To take textiles alone, in this financial year St Michael's have diverted from what has not been sold to the public, 6.56 tonnes of clothing a week from landfill, saving the authority approximately £29,000 in landfill tax. In the same period over 4 tonnes a week of paper and bric a brac has been diverted from what has not been sold to the public. A further saving of £18,000. Savings in addition to the benefit this type of re-use and re-cycling activity have on the reduction of carbon dioxide emissions.

However, in addition to the majority of goods that we can sell or recycle there are a fraction of donated goods that we cannot sell and which must be disposed of so that we can continue to operate our shops and fund our vital work.

Without question the removal of free tip permits will have a significant direct financial impact on St Michael's Hospice. (Estimated to be in excess of £26,000 per annum for disposal with a commercial company). This in turn will place an increased burden on our fundraising efforts taking resources which could be better spent on patient care.

If, as is determined under the Environment Protection Act 1990, and schedule 1s4 of the controlled waste regulations 2012, the local authority has a duty, if requested, to collect any domestic waste arising from charity shops and for which if it chooses it may recover a "reasonable charge" if charities such as St Michael's chose to make such a request this would require additional resource and potential cost on the part of the council.

2. Proposal to Introduce a Reuse Credit Payment

Whilst recognising that a scheme enabling charity shops to claim credits for the amount of donated items that they reuse could provide some benefit to charities like ourselves, the reality of what is proposed not only offers limited financial benefit if capped at the suggested rates, but the costs of establishing and running such a system would very likely outweigh the benefits.

In particular, the burden on our staff and loyal volunteers of recording every single item sold in a way which we are not currently set up to do (we do not have a EPOS till system and only record by category of sale e.g. clothing, bric a brac, books) is felt currently unworkable. The cost of the introduction of a system which would enable individual items to be recorded against a record of sale is also currently considered prohibitively expensive.

As a local charity with strong public support we have always been keen to work with the Council, our supporters and volunteers, to find new ways of diverting reusable waste from landfill. As you are aware the current partnership we have where bulky domestic items collected by the council that are suitable for reuse are donated

to St Michael's to sell is one excellent example. Developing this collaborative strategy further, perhaps through sharing some of the information we record on recycled books and textiles could bring net benefits to both of us. Alternatively, limiting the number of free tip permits to each charity shop in the County (perhaps 12 per shop) could provide a workable compromise.

In light of the very positive footprint St Michael's charity shops have locally, we hope that the Council will agree to retain free tip permits and explore further with us ways in which we can strengthen our approach to waste and collaborative working.

Yours sincerely



Ruth Denison
Director of Income & Marketing



Nicola wood
Head of Retail