Resource Recovery and Waste Services Review June 2024



This report is an informal review of the Resource Recovery and Waste Services Policy 2023 as requested by Council resolution on 8 August 2023.

The report provides an overview of community sentiment and customer experience, the effectiveness of the service with regard to environmental outcomes including the legislated diversion of waste from landfill and options for considerations for ongoing service delivery and monitoring.

Yarra Ranges Council acknowledges the Wurundjeri and other Kulin Nations as the Traditional Owners and Custodians of these lands and waterways.

We pay our respects to all Elders, past, present, and emerging, who have been, and always will be, integral to the story of our region. We proudly share custodianship to care for Country together.

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1. What have we heard?

The introduction of the new waste service has seen an array of responses and feedback from community. During the transition period of June 2023 to February 2024, there was significant resistance to the services changes, particularly regarding the shift to fortnightly rubbish collections and the introduction of the universal FOGO bin.

The review commenced in October 2023 to align with changes to service delivery has been informed by six months of data, as well as feedback from the community. Data from the six months was then compiled and reviewed in April/May to inform the review.

This section summarises the feedback that has been received and captured through one formal petition received by Council at the time of this review and one submission to Council, customer requests, complaints, targeted follow up phone calls from our customer experience team and monitoring of social media channels.

Social Media Data

While social media isn't a voice for all of community, it does provide a snapshot of community sentiment around community matters. Social media monitoring of council posts and online interactions during the transition period demonstrated a diverse range of sentiment and commentary towards the service transition.

There was a mix of concerns expressed by residents alongside other feedback including excited, curious and supportive.

The most common feedback related to the service changes, in particular the inclusion of an opt-out option to FOGO. The breakdown of reasoning for an opt-out option included:

- The cost of the FOGO service
- The use of home disposal mechanisms such as composting and/or chickens
- Rubbish collection frequency and overfilled bins leading to littering.
- Residents who have reduced their landfill volumes and advocated for an even more infrequent collection.
- A perceived lack of the need for the FOGO service.
- The concern that community was not given a choice about the new waste services overall.

Capacity and odour were main reasons provided for wanting a weekly rubbish service.

Since the implementation of service changes in October 2023, social media responses by residents have decreased substantially, but the response to the new service remains mixed.

Community Petition

A petition received by Council on 14 May 2024, garnered 459 responses and requested:

- return to weekly rubbish collections, and
- an opt-out option for FOGO

Data presented to Council at the 14 May 2024 Council Meeting associated with the SurveyMonkey survey (undertaken by residents) included;

- Residents want weekly rubbish collection
- The survey supports residents' rights to Opt-out of the FOGO service
- 83 percent said they would support an Opt-out option
- 81 percent would like to see the weekly rubbish collection reintroduced, which increased to 92 percent for households with five (5) or more people
- 85 percent of people saw little or no reduction in general waste, which increased to 90 percent when considering larger households.

While the survey was not undertaken by Council, for completeness this data has been considered as part of the overall mix of feedback. Council officers do not have access to the full survey or its data to analyse any further.

Submission to Council

One submission has been received by Council in April 2024 which requested reverting to weekly rubbish collection on the basis that taking out food waste from rubbish bins removes mass but very little volume.

In addition, since the implementation of the new service Council has received several public questions to Council Meeting, seeking clarification on elements of the service and waste collection.

Service Requests

Collection services are provided to over 65,000 properties.

Service data has been collected during the waste transition period and after the service has come into effect. Waste related customer requests increased significantly during the transition period when compared with the same period in 2022-2023.

Table 1 shows the separation of request types. This data shows that while there was an increase in FOGO related requests, general requests (unrelated to FOGO) also increased. Figure 1 shows the breakdown of general request types and compares the data through the service transition phases.

Table 1. Number of council requests

Request types	Oct 22 to Mar 23	Oct 23 to Mar 24
Excluding FOGO categories	10,712	11,569
(This covers all categories - Waste, Recycling, Litter, Hard waste bundled branches, landfill.)		
FOGO Liner requests		899
FOGO Requests		3,381
TOTAL Requests	10,712	15,849

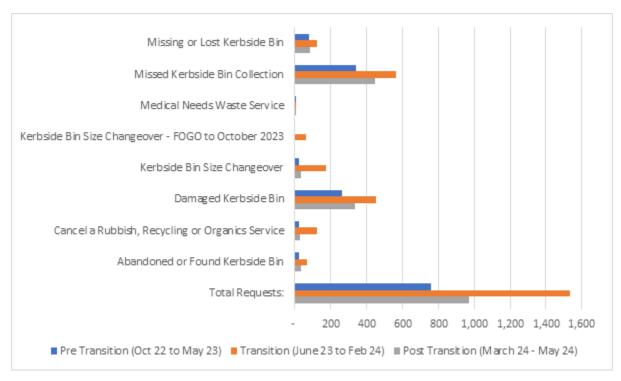


Figure 1. Average customer requests by category of the pre-transition to post-transition periods, excluding requests for FOGO liners.

Since the service changes came into effect, there has been a substantial decline in general requests, trending toward pre transition numbers as shown in Figure 1.

Customer Complaints

Formal complaints relating to waste services recorded by the Customer Experience team are shown in Figure 2. Recorded complaints are those that have escalated to a formal complaint, beyond the normal action of a request. This figure shows a decline in formal complaints since the service change implementation and the monthly average trending downward.

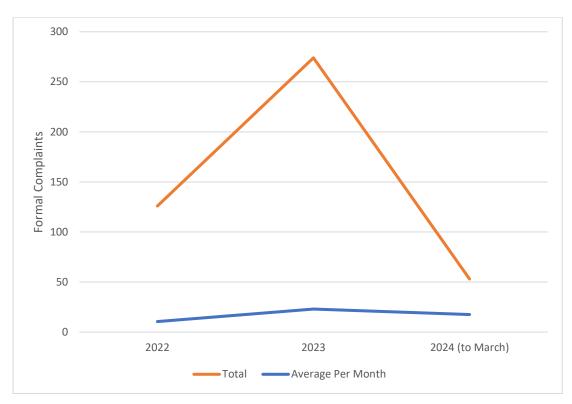


Figure 2. Formal complaints relating to waste services.

At the time of the service transition, there was a significant increase in enquiries regarding service changes. Whist the number of calls received is known, at the time call logs did not separate complaints from general enquiries or requests for service changes.

This data will continue to be monitored and consideration given to how the topic of a particular enquiry can be tracked ongoing to support future reviews.

Table 2. Total calls received in 2022/2023 and 2023/24 relating to waste enquiries.

Incoming calls	2022/2023	2023/2024
Calls for general waste enquiry to the contact centre	12,874	21,022
Calls for general waste and FOGO/new service enquiries to the waste admin team	2,127	2,971
Calls for FOGO/new service enquiries to the FOGO transition team (temporary in 2023/24)		1,401

Customer data and community sentiment show two key points of interest for different reasons, including:

- the return of weekly rubbish collections, and;
- an opt-out option for FOGO.

Other Customer Feedback - Medical, Nappies and Non-Residential

Medical needs waste services

Historically an additional medical needs rubbish bin has been available to all residential customers at an additional charge. In 2023, 32 customers used this service.

During the service transition, 150 people contacted Council expressing concerns about disposing of medical waste. Follow up phone calls after the fortnightly rubbish service commenced revealed that the majority of people that expressed concern were able to manage and no longer felt the need for an additional bin.

Many metropolitan councils provide a free or subsidised rubbish bin for medical needs. On 30 November 2023, Yarra Ranges Council CEO approved an amendment to the *Resource Recovery and Waste Services Policy* to accommodate medical needs. This includes the provision for an additional rubbish or recycling bin, at no charge, for a residential property where additional waste disposal is required due to a medical condition, disability or chronic illness upon receipt of a medical certificate.

Since the introduction of the fortnightly rubbish service, 29 properties have applied for the new medical needs waste service. (This includes some of the original 32 customers who used the service pre-transition). The accessibility of this service is crucial for community members who rely on additional support from the waste service and is in line with Council's Equity Access and Inclusion Strategy. The cost of providing this service is minimal in the context of the broader waste services provided.

Waste services for households with children in nappies

Yarra Ranges registers 1,825 new births on average annually. In 2021 there were 9,298 children aged 0-4 (ABS) likely to use nappies in Yarra Ranges.

Having participated in a Sustainability Victoria funded cross-council project, providing information and education has been recommended over financial incentives to achieve behaviour change on what alternatives are available to assist in supporting new parents. The nappy workshops run in 2023 were well received with 70 attendees from Yarra Ranges. Each participant received a free trial pack of reusable nappies and nappy alternatives information.

Following the introduction of the new service, Council's Maternal and Child Health Services have reported no feedback or requests from the community for additional rubbish bins for children in nappies.

Non-Residential Rubbish Services

Non-Residential customers include – Commercial traders, public facilities and any property that is not rated as Residential.

Non-residential customers are able to opt-in to use councils waste collection services or use private waste collection services. Before the service changes, when using councils service, non-residential properties could opt for up to two weekly collections of rubbish or equivalent for remote areas for an additional charge. Since October 2023, rubbish bin collection has shifted to fortnightly, reducing frequency of the rubbish bin to up to 25 per cent of the former service plus the inclusion of the weekly FOGO collection for the same waste charge. A weekly FOGO bin collection is provided for the organic material.

Feedback from traders has been mixed with some smaller businesses being able to manage with the change where as others advising that the new service did not meet their needs, the FOGO bins would get too heavy, health concerns regarding cumulation of rubbish. This reduction in service has prompted some businesses to switch to private waste services.

Feedback from non-residential customers, primarily businesses and organisations, such as schools, has indicated that:

- A 240L rubbish bin is preferable to the 120L bin due to fortnightly collection.
- A 120L FOGO bin is preferable for the additional bin as weights often exceed the 75kg allowance and this size helps to avoid manual handling risks, including on challenging terrain.

Service Data

To gain a greater understanding of how resident feedback aligns with how the service is actually operating, analysis was undertaken on bin capacity and contamination.

Bin Capacity

Issues relating to bin capacity since the introduction of the fortnightly service have been investigated. Table 3 highlights data from periods 2022/23 and 2023/24 which provides a comparative data set. Whilst the number of overfilled rubbish bins has increased, the occurrence in comparison with the total number of services remains very low (0.01% to 0.03%).

Table 3. Reported issues for rubbish collection

Rubbish Weekly Issues Data	October '22 to March '23	October '23 to March '24
Total services	61,556	31,113
Bin overfilled	10	11
Bin too heavy	0	0
Major contamination	2	0
Minor contamination (emptied)	2	3
Resident refilled bin	1	1
Waste stuck in bin	6	3
Total reported issues	20	18

In addition to the weekly reported data, Council's waste contractor conducted a specific audit in April 2024 over a two-week period across the municipality to establish how many bin lids were not fully closed for all collection service streams as an indicator of overfilling.

All bins that were not fully closed were recorded into two categories.

- 1. Bins that were full but not overfull (bin lids only slightly ajar).
- 2. Overfilled bins where the bin lid was fully open, or the bin lid was shut but bin contents strewn around bin at the time of collection.

The results indicate that 1 in every 115 bins presented was overfilled. Of the 65,675 bins collected:

- 417 were full (lids slightly ajar) (0.63%)
- 569 were Overfull (0.87%)

Combining both overfilling metrics shows that 1.5% of the total bins collected could be considered overfilled.

This bin capacity information can be collected regularly and be used to inform targeted communication opportunities for properties that repeatedly present overfull bins.

Traders and commercial businesses have raised that the fortnightly 120L rubbish bin collection is not sufficient and larger bin capacity would be preferred. The 240L FOGO bin also creates concerns as a full FOGO bin cannot be lifted and exceeds the trucks lifting capacity and impacts the safety of staff in putting bins out. Smaller 120L bin required as additional bins.

Some Multi Unit Developments (MUD's) are having difficulty with bin storage and placement for collections due to large bin numbers and limited space.

2. How are we performing?

An assessment of the environmental success of the new service has been considered with regards to State legislated and Council Policy waste targets.

Council's current position with respect to these targets are shown in Table 4.

Table 4. Performance against State and Council Targets

State and Council Targets	Baseline to October 2023	Post Service from October 2023	
State diversion from landfill:			
72% by 202580% by 2030	46% Diversion	73% Diversion Rate	
Council diversion from landfill:	Rate	(27% increase)	
75% by 202590% by 2030			
State waste generation reduction:	347kg		
• 15% per capita by 2030		244kg (29% reduction)	
Council waste generation reduction			
• 20% per capita by 2030			
State organics to landfill reduction:	45% Organics to Landfill		
20% reduction by 202550% reduction by 2030		32% Organics to Landfill 14% reduction to date	
Council organics to landfill reduction:			
25% by 202560% by 2030		1470 reduction to date	

Prior to the service change, the diversion rate of recoverable materials (e.g. recyclables and organics) for the kerbside collection services was 46 per cent, substantially below State and Council targets.

In the six months since the universal weekly FOGO service and change to fortnightly rubbish collection, the diversion rate has increased to 73 per cent, just below the 2025 Council target. All Council's calculations are based on measurements using weight as the industry standard. (Trucks are weighed at disposal sites and collection contracts are formulated around weight, not volume).

The reduction in the amount of rubbish disposed per household and a corresponding increase in the recovery of organic material is shown in Figure 3 and Table 7.

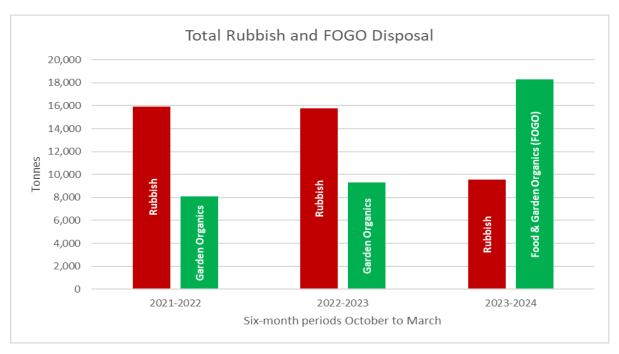


Figure 3. Comparison of rubbish and FOGO disposal rates over three consecutive periods.

Table 7. Collection of FOGO and rubbish before and after service	「able 7. Collect	on of FOGO a	and rubbish	before and	l after service changes	
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	Oct 22 to Mar 23 (Tonnes)	Oct 23 to Mar 24 (Tonnes)	Change
Total amount of FOGO collected (compared previous year Garden Organics)	9,280	18,317	97% increase
Total amount of rubbish collected	15,780	9,532	40% reduction

This data shows that the changes to services has reduced waste to landfill, alongside increasing recovery of organic material. It can be reasonably inferred that the reduction in rubbish is a result of both the removal of organic material into the FOGO stream and behaviour changes resulting from training and education as part of the service transition.

Contamination

Contamination rates impact diversion targets and therefore can be used as an indicator of the gap to meet diversion targets. Contamination rates of garden organics material prior to the service changes was less than three percent. It was originally anticipated that the contamination rate would rise to 10 per cent following inclusion of food waste given experiences of other councils.

Bin composition audits undertaken in May 2024 at the FOGO receival company showed a 0.49% contamination rate, which is very low.

3. What could we do differently?

Council currently provides the following bin options for its kerbside services:

- Fortnightly Rubbish 80L or 120L
- Fortnightly Recycling 120L or 240L
- Weekly FOGO 120L or 240L

Currently, additional bins are restricted to the largest size within a particular category. Existing rebates and incentives currently provided are:

- Free additional rubbish or recycling bin for medical needs waste
- Up to four free recycling bins for schools (including FOGO from July 2024)
- A reusable nappy education program
- Free or subsidised bins to community groups and events through Council's small grants.

Overall, the sentiment from the community highlights the need to consider a wider range of bin size options. In response to this aspect of community feedback, one prompt change could be to offer the choice of any size from the existing range, with respective adjustments to the fees and charges.

Cost implications of changing the service level have been estimated but will need a formal contract variation response from Council's collection contractor.

The following table summarises the key areas of concern raised by community, existing options, alternative options and considerations for any service change. Further detail is added for each waste stream after the table.

Table 8. Summary of options for consideration based on areas of community concern.

Key Area of Concern	Existing Options	Alternative Options	Considerations for Change
Return to a weekly rubbish collection Weekly Rubbish Collection/	120L. Pay for an additional 120L	Return to a weekly service at 120L	Diversion targets not able to be met. Significant contract/waste implications and inequity for those embracing existing service. Contract variation would have an increase in cost per household <i>Not recommended</i>
Overfilled Bins		Return to a weekly service but with smaller 80L bin	2. Would require large scale bin change over and therefore contract variation. Significant contract/financial implications from reverting to weekly. Some impact to diversion targets, but less than (1). Contract variation would have an increase in cost per household <i>Not recommended</i> .
		Offer an opt-in weekly service (user pays)	3. While some higher cost would be consistent with disincentivising rubbish disposal, collection costs would be spread over those opting in, so will be individually significant. <i>Not recommended</i>
		4. Larger alternative bin sizes (240L).	4. 240L bins encourages higher rubbish volumes through disposal of larger items so some impact to diversion target may occur, but likely minor given scale of current community feedback and FOGO & recycling options. Policy updates would be required to reflect new fees and charges with minimal likely contract/financial implications. Contract variation would likely have an increase in cost per household if take up the larger bin size <i>Recommend progressing</i>

Key Area of Concern	Existing Options	Alternative Options	Considerations for Change
		5. Alternative additional bin options, such as 2 x 80L or additional 80L bin	Additional bins have predominantly been the larger bin size. Include all bin sizes as additional options – to be costed accordingly.
FOGO Opt Out	Existing options 120L or 240L bin sizes Pay for additional 240L bin Exemption for all waste services for properties over 4ha.	 Alternative base Bin Size (80L) Alternative additional bin size (120L or 80L) Offer an unregulated opt-out option Offer an opt-out option based on property size Offer an option - based on a conditional application process 	1 & 2. Budget/Policy updates to reflect new fees and charges with minimal contract/financial implications. Contract variation would be required for inclusion in 80L bin size for FOGO Recommend progressing 3, 4, 5. Significant contract/financial implications. Risk given the State Service Standards not yet finalised that may not align with Council decision & cost of monitoring and managing the opt-outs would cost more than the savings of properties not using the service. Recommend delay decision until after State Service Standards are finalised In addition, progress toward organics to landfill targets will be compromised under option 3 & 4 because no alternative organics disposal offered. Recommend defer decision until after State Service Standard is finalised.
Multi-Unit Developments	Standard Service Options or Exemption through Planning permit with Minimum waste service charge	Shared bin usage agreements.	Budget/Policy updates to reflect new fees and charges with minimal contract/financial implications. Will be based on site specific requirements. New provision type for Council rates. Recommend progressing
Glass collection	Continue with 1 July 2025 commencement date	Defer to 1 July 2026 commencement date	Minimal financial/contract implications, positive outlook for cost-of-living pressures. Recommend delaying the commencement of the glass service until 1 July 2026

Key Area of Concern	Existing Options	Alternative Options	Considerations for Change
Disposable nappies	Order an additional rubbish bin (charge applies)	 A program aimed at addressing barriers, use of Reusable nappy products and the options available for using disposable nappy recycling services Use of a private disposable nappy recycling service 	1 & 2. Any consideration of subsidising this additional service would increase the waste charge for residents not requiring this service.
Non- Residential service (commercial traders & public facilities)	Order additional rubbish bins (charges apply)	Provide a 240L rubbish bin option	Contract variation discussion to be undertaken to consider larger 240L rubbish bin

Rubbish

In response to community feedback, the recommended options to progress are a wider range of bin size options, (240L) and all bin sizes (80L, 120L & 240L to be available as additional bins.

It is also recommended to continue the re-usable nappy trial for another 12 months, and continue education aimed at addressing barriers regarding use of Reusable nappy products and private disposable nappy recycling services.

To work on a process and system to allow for shared usage agreements for larger Multi-Unit Developments for all bin collection streams.

- The fortnightly rubbish collection frequency has been a key factor in progress toward State targets.
- Most households have responded positively to the current system, and alternative bin options are available for those needing extra capacity.
- Odour emanating from organic matter is currently addressed through weekly FOGO collection. The resident cohort who remains unsatisfied are generally those with babies and disposable nappies.
- Some households with residents with medical conditions generate more waste or recycling due to packaging from management and treatment as a result of additional packaging. They have the option of a free additional bin (Rubbish or Recycling) as part of the Free Medical service provided by council.
 - The following items if considered will all have additional costs:
 - A re-introduction of a weekly rubbish collection going from a fortnightly collection to weekly will mean double the trucks and resources to collect. Providing two bins to all properties would also increase the truck and resource numbers. This will also be compounded by increased disposal costs for increased waste including landfill levy increases by the State Government
 - Additional bins for those requiring additional bin space the additional costs are based on provision of bin, disposal of additional waste and additional time/labour and trucks for the additional collections.
 - Extension to the Reusable Nappy Workshops

Swapping Fogo and Rubbish collection frequencies so FOGO is collected fortnightly, and Rubbish is collected weekly will have serious impacts on bin odour in FOGO as food will be sitting around for two weeks. As a result, some food will then end up back in the rubbish bin and increase landfill disposal. This will have a significant impact on recovery rates and waste reduction targets.

- A 240L rubbish bin may be appropriate for shared premises like multi-unit developments (MUDs) where the bin storage is challenging, Non-Residential properties (commercial traders and public facilities).
- Including a 240L bin for residential properties would increase the risk of larger items being included in the bins through property cleanouts. Continuing the option

- for additional 120L bins for residential properties is the preferred method for properties that require additional capacity.
- Some residents yet to have the Red lid change over occur, there have been over 90 per cent replaced and this will continue to be worked on.

Shared Usage Agreements

Council's Policy does not currently allow bin sharing. Other councils offer this option to residents in multi-unit developments (MUDs) and non-residential customers, where bins storage space poses challenges. Bin storage will become even more critical when a kerbside glass service is introduced.

Discussions have taken place with MUDs and retirement villages about removing bins, but individual fees and charges still apply. Exploring shared bin usage agreements to distribute service costs among property owners requires further investigation.

FOGO

In response to community feedback, the recommended option to progress at this stage is a smaller bin size option of an 80L bin and all bin sizes (80L, 120L & 240L) to be available as additional bins.

The State Services Standards for waste have been recently released for consultation. The draft standards include consideration of a FOGO opt out for properties that have systems in place to manage FOGO on the property. Yarra Ranges will need to consider the guidelines and the impact on the waste charge. At this stage it is recommended that Council hold off on a decision on the possibility of a FOGO opt-out until state guidelines are finalised. In the meantime, contract variation pricing on property opt-out scenarios will be sought and subsequent impact on waste charge modelled in preparation for a state position.

Under section 3.1 of the current Waste Policy, properties over four (4) hectares can currently seek an exemption for entire Council waste services, not limited to FOGO, if the owner/occupier:

- Has an alternative method for disposing of residential waste that complies with EPA regulations and does not cause a nuisance.
- Aligns with the resource recovery goals outlined in the Recycling Victoria a New Economy Policy 2020.
- o Satisfies Council's requirements.

Currently, 16 rural residential properties have exemptions from kerbside services. Additionally, 98 multi-unit residential properties have private waste collection services which is stated in the approved Planning Permit for each development. These properties do not use or pay for the kerbside bin collection component but pay the minimum Waste Service charge as per Council's policy.

- The dispersed and diverse communities of Yarra Ranges differ significantly from other metropolitan councils, impacting waste service delivery, especially in rural areas. While 70 per cent of residents live in urban areas (expected to rise to 85% by 2030), this constitutes only three per cent (3%) of the municipal land area.
- Introducing an unconditional opt-out option for the FOGO service (i.e. if a resident does not need to demonstrate they have alternate & satisfactory onsite processing options) is likely to impact diversion rates; however, after the initial six month period of the new service, it remains unclear at which thresholds these rates will be affected.
- If a high number of exemptions are granted, FOGO disposal costs will decrease, but not necessarily proportionately to the service numbers. This discrepancy arises because a significant portion of the cost is associated with the collection service and the distance from rural properties to the FOGO receival facility.
- There would be management and monitoring requirements for opt-out properties which would cost more than the savings of properties not using the service. This cost would be be more than the savings of individual properties opting out of the service. Inspections and audits are required to ensure properties are using the services the way they are intended and not putting food waste in the rubbish bin. This is also required to ensure we are meeting landfill diversion targets set by council and the state government.
- Notably, composting a tonne of organic waste is currently 27 per cent cheaper than landfill disposal.

- Alternative to an application process, the Policy could be revised to exempt certain
 property categories, such as those greater than four (4) hectares. This would
 reduce administrative costs but would not eliminate collection charges. Notably,
 there is no evidence correlating property size with appropriate organic waste
 disposal and this approach would prevent smaller properties from opting out.
- Knox and Port Phillip Councils already offer an "opt-out" option for their FOGO service. These councils are significantly smaller in geographical size and don't service rural communities.
- If Council adopts changes before the release and approval of the State Service Standard, it could result in substantial costs and confusion if additional modifications to opt-out provisions become necessary once those standards take effect.
- A FOGO opt-out would see all properties continuing with the service subsidising the cost of properties that opt-out. This is due to contract costs for vehicles, labour and fuel still required for trucks needing to travel past all properties.
- A smaller 80L FOGO bin choice could be provided (with proportionally lower cost) for those residents who feel they generate a lower volume, or have alternate (onsite) processing means.

The Following items if considered will all have additional costs:

- A FOGO opt-out would see all properties continuing with the service subsidising the cost of properties that opt-out.
- Administration of an opt-out arrangement which would include property and bin inspections

Recycling

Our recycling service has remained the same throughout this transition period and at this stage there are no proposed changes to this service.

 Given the Container Deposit Scheme (CDS) only commenced in November 2023, it is recommended to hold off on any changes until direct reduction data on recycling figures are confirmed. The introduction of the Glass service will also impact volumes in the recycling bin when collected in the separate bin. It is proposed to wait before acting on any service change.

Glass

To support a successful implementation of a new kerbside glass collection, it is recommended to defer commencement of the service until 1 July 2026.

- The Recycling Victoria: A New Economy Policy requires all Victorian Councils to offer glass collection by 2027. In June 2023, Council adopted plans for glass service implementation in the 2025/2026 year.
- At the same time, the State Governments Container Deposit Scheme (CDS) commenced in November 2023 with its full impact yet to be determined.

- Council's ten-year Kerbside Bin Collection Contract with JJ Richards (from 2023)
 mandates glass service implementation in the 2025/26 financial year. JJ Richards
 requires an 8-month lead time for glass service vehicle procurement, and bin
 production (68,000 glass bins).
- Due to cost-of-living pressures and the introduction of Food Organics and Garden Organics (FOGO), it is recommended to delay commencement of glass collection until July 2026.
- Consultation with JJ Richards in February 2024 revealed:
 - Glass collection rates are contractually defined for periods up to and including a 2025/2026 introduction. If a glass service is not introduced in June 2026, a contract variation is needed to write off bin and truck capital value.
 - Glass bins will be amortised over 36 months, trucks amortised over the contract term.
 - A delay would increase 2025/2026 rates by around 7.5 per cent, plus standard Rise & Fall (based on CPI).

