

Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland

Summary of Responses – Executive Summary



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Introduction

The Department of Agriculture, Environment & Rural Affairs (DAERA) recently sought views on a public discussion document which covered the potential options to help improve resource management in Northern Ireland (NI). The discussion document “Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland” was launched on 26 June 2020 and closed for responses on 4 October 2020.

The responses to the discussion document have been analysed and collated in a detailed Summary of Responses document which can be found [here](#). Due to the large number of proposals and the associated analysis, the full Summary of Responses is quite long therefore this Executive Summary has been produced to provide stakeholders with a broad overview of the responses received to the discussion document. Included in this summary is a ‘next steps’ section, which you will find at the end of this document. This section outlines the Departments’ plans for the future of recycling in Northern Ireland.

Background

The implementation of the Circular Economy Package (CEP) in UK law amends six existing waste related Directives for Northern Ireland and requires relevant updates to NI waste legislation in relation to waste collection, recovery and preparing for re-use and recycling. CEP drives changes across a broader range of sectors than UK waste policy has previously focussed on including retail, hospitality, education and transport sectors. As such DAERA was keen to seek initial views and insights on a range of proposals in order to help with policy development.

The aim of the discussion document was to seek views on a range of initial proposals which were designed to help improve resource management in Northern Ireland from households and the wider municipal sector businesses.

Public Discussion Document

The public discussion document was promoted widely, particularly through all the relevant stakeholder groups who have an interest in this subject area. The discussion document covered 17 proposals designed to progress cross sector change to help NI move forward in light of the greater ambition in managing resources and increased recycling performance adopted in the CEP. These areas covered a range of relevant topics including amendments or updates to existing requirements, changes to collection systems, common NI guidance, support mechanisms for businesses and improvements in data management. The 47 questions within the document were designed to gauge views on different aspects of the 17 proposals.

A series of 12 public events were delivered by DAERA and the Waste and Resources Action Programme (WRAP) to help potential respondents and stakeholders understand the proposals. The sessions covered the underpinning evidence and enabled attendees to ask questions to better inform their responses.

Discussion Document Proposals and Questions

Each section in the discussion document outlined proposals to improve recycling from business and other organisations. Each proposal had a number of supplementary questions aimed at obtaining stakeholders views and evidence that would allow an informed way forward.

Responses to the Discussion Document

Fifty six substantive responses were received to the discussion document with the majority of responses received via Government's Citizen Space webpage which helped to standardise the responses from respondents and stakeholders. Twelve submissions were received separately via email and were input manually to allow fair comparison and analysis to be undertaken.

In Citizen Space, respondents were asked to classify themselves into one of many potential categories to enable further review of responses and in particular to help DAERA understand the context of stakeholder responses. Appendix A contains a full list of respondents along with the categorisation of the respondents.

Overview of Responses

Non-Household Municipal Waste

Proposal 1: In order to increase food waste collected from the non-household municipal sector, the Food Waste Regulations (Northern Ireland) 2015 should be reviewed to ensure obligated businesses segregate food waste for collection.

There was broad agreement that the Food Waste Regulations (Northern Ireland) 2015 should be reviewed in respect of food waste collections from food businesses with 91% of those who answered agreeing with this proposal. There was 100% agreement received from businesses, trade bodies, local councils, local council sector bodies and NGOs. Lower agreement rates were seen for householders (88%), 'Other' respondents (67%) and waste management companies (75%).

Respondents were presented with a number of proposed areas for further investigation and of those who answered, the response was extremely positive with a large majority indicating either Strongly Agree/Agree in each area, as summarised below:

- **Awareness of the regulations to obligated businesses** (93% of those who answered either strongly agreed or agreed)
- **Requirements to separate food from all business categories** (85%)
- **Options to amending the regulations for more business categories to be in scope of the requirements** (85%)
- **Access to food recycling services for businesses** (94%)
- **Charging levels for food waste collections** (73%)
- **Monitoring business compliance** (85%)
- **Enforcement of business compliance** (80%)
- **Data and reporting of food recycling** (85%)

Additional respondent feedback included the need for enforcement to ensure business compliance and the need for effective communication of the Regulations.

Proposal 2: We want to increase recycling from businesses and other respondents that produce municipal waste. We think the most effective way of doing this would be to require these establishments to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste collectors.

The majority of respondents agreed that all businesses, public bodies, and others that produce municipal waste should be required to separate dry recyclable material from the residual waste. Fifty three out of fifty five respondents who answered agreed (96%).

Across all respondent categories, 65% of those who answered indicate mixed dry recycling, separate food recycling and separate glass recycling as their favoured option, although 'something else' was the predominant answer for local councils and trade bodies.

Over 65% of respondents who answered believe that it should be practicable for businesses to segregate waste for recycling in all circumstances. The majority of respondents do not believe there should be exemptions for some businesses from the proposed requirements. From the additional comments received to this proposal, respondents acknowledged that a change in legislation is necessary, some respondents believed that legislation alone is not enough to effectively increase business recycling and that this must be accompanied by communications campaigns, business incentives and effective monitoring and enforcement.

Proposal 3: As rural communities make up a significant proportion of Northern Ireland, we propose to review the impact on businesses in rural communities so that they are not disproportionately affected by laws introduced to increase recycling of non-household municipal waste.

An overwhelming majority of respondents believed that additional factors must be considered in respect of rural businesses. Of those who answered 91% believed that consideration should be given to the cost of recycling services proposed compared to that in urban areas. Whilst 89% believed that the ability to reconfigure services to alleviate cost burden in rural addresses should be considered. Across all respondent categories, 98% believed that access to recycling services in rural areas should be included in any review.

Additional respondent feedback raised concerns that cost burdens do not shift on to local councils, consideration for household waste in rural areas, and the carbon impact of increased rural collections and communications to rural businesses.

Proposal 4: We propose to review options to maximise business recycling whilst alleviating cost burden on businesses.

Overall, responses were generally positive to all of the options outlined in this proposal. The highest percentage of positive answers was seen for **‘Providing guidance and advice on current services’** and **‘Clearer information on what/ how materials can be recycled’**, where over 90% of respondents answered ‘Very likely’ or ‘likely’. The lowest percentages of ‘Very likely’ or ‘likely’ answers were seen for **‘Review of cross boundary working’** (58%), **‘Sharing of containers’** (60%) and **‘Standardisation in pricing approaches’** (67%).

The majority of comments agreed with the proposals designed to reduce the cost burden to businesses whilst increasing recycling. The future role of HWRCs, the issue of pricing standardisation, subsidies and incentives, along with the need for clear guidance and information to businesses provoked significant input from respondents. Communication and support were seen as key to improving business recycling from a majority of those who answered. A significant number of respondents also believed that a combination of incentives and effective enforcement were necessary to increase business recycling.

Proposal 5: In advance of implementing changes to business recycling, we will work with waste producers and waste collectors to improve reporting and data capture on waste and recycling performance of businesses and other respondents. Any requirements will be subject to further consultation.

Nearly 90% of respondents believed that businesses/other respondents should be required to report data on their waste recycling performance. In respect of responsibility for reporting data on waste from business, a majority of respondents believed this should lie with producers, followed by collectors, and re-processors.

In relation to specific data sets that respondents would find most useful if businesses were required to report, a majority indicated that information on recycling data and the end destination of recycled material as the most important potential data sets. Some respondents believed that existing waste data collection systems could be adapted for use in the non-household municipal sector and could be further enhanced by the implementation of waste tracking.

Household Waste

Proposal 6: We propose that all Councils in Northern Ireland should be required to restrict capacity for residual waste from households to help divert more materials into the recycling waste streams.

Whilst there was some variation by respondent category to the questions around this proposal, the overall response was very positive with 88% of those who answered agreeing that residual waste capacity should be restricted. A majority of respondents (excluding local councils) believed this should be accompanied by enhanced recycling services. There was a fairly even split among respondents on how this proposal should be taken forward with a very slim majority in favour of reducing collection frequency whilst retaining the same size container.

On the range of options provided to enhance recycling services there was quite a varied response with a slight majority indicating preference for a larger container capacity for the dry recyclables collection (52%), followed by increased frequency of the dry recyclables collection (45%) and increased frequency of the food recycling collection (43%).

Proposal 7: By 2023 we propose to legislate for Councils to provide all kerbside properties and flats with access to at least a weekly collection service for food waste.

Responses to the questions for this proposal were very mixed with quite an even split on how this proposal should be progressed. Of those who answered, 55% of respondents agreed with a weekly collection of food waste however opinion was divided on both a separate collection of food waste and a weekly mixed food and garden waste collection. A majority of respondents believed that free caddy liners should be provided to householders for food waste collections.

The highest levels of difference for the proposal to mandate weekly collection of food waste came from local councils with additional cost and increased emissions put forward as an argument against implementing this proposal. Some respondents believed that there were much more efficient ways of improving food waste capture rate than those proposed however alternatives were not provided in detail.

Proposal 8: We propose that all Councils in Northern Ireland should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

Among those respondents who answered the questions in this proposal there was overwhelming agreement that local councils should be required to collect a core set of materials from the kerbside, with only one respondent disagreeing.

The potential challenges local councils would face in implementing this requirement for existing flats and HMOs was raised with increased contamination, storage space and communication being the predominant concerns. Additional cost burdens on local councils and ensuring consistency of collections were also considered important. Whilst respondents believed the potential impact of proposed Extended Producer Responsibility (EPR)/Deposit Return Schemes (DRS) on kerbside volumes must be clarified to allow councils to plan ahead. Potential additional funding for local councils from EPR was also highlighted.

Proposal 9: We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots, tubs and trays, and steel and aluminium tins and cans.

A significant majority of respondents who answered questions in this proposal were in agreement with the core set of materials to be collected, however they believed that these changes should be phased in over time. Of those who answered, there was a strong belief that glass bottles and containers (92%), paper and card (94%), plastic bottles (96%), plastic pots, tubs and trays (96%) and steel and aluminium tins and cans (94%) should be included in the core set, but phased in over time.

In respect of black plastic food and drink packaging, there was significant variation in responses. Of those who answered, 64% believed that this should be included in the core set but phased in over time. The highest level of disagreement to including black plastic in the core set came from waste management companies.

It was a fairly similar picture in respect of including plastic bags and film in the core set. However 74% of those who answered believed this should either be included in the core set or included but phased in over time. The strongest disagreement for including plastic bags and film in the core set came from local council sector bodies, businesses and waste management companies.

A number of respondents add that they would like to see cartons, textiles, batteries and small WEEE added to the core list however the clear message here is that environmental benefits and the quality of recycling must not suffer. Technology, infrastructure and end

markets are highlighted as other areas to be considered along with timeframes and funding mechanisms (EPR/DRS) when taking decisions on materials for inclusion in the core set.

Proposal 10: We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that:

- a) evidence supports the benefits**
- b) there are viable processing technologies for proposed materials**
- c) there are sustainable end markets**
- d) Councils would not be adversely affected, including financially.**

Responses to the questions for this proposal were very positive. Of those who answered, 98% of respondents agreed that the core set should be regularly reviewed and, provided certain conditions are met, expanded. In respect of the conditions to be met in order to add a core material, 65% of respondents agreed with the proposed list but would add some further materials. All local councils and local council sector bodies answered **‘Yes – but I would also add some’ (core materials, provided the above conditions are met)** as did 88% of waste management companies.

Additional conditions submitted by respondents for adding a core material to the list included the ‘proximity principle’ for infrastructure and end markets, communication of change to the public and environmental benefits. A number of respondents believed that the core set of materials should align with new and existing policies, in particular EPR/DRS, and that communication with the public and further consultation with stakeholders is essential.

Proposal 11: We propose to review the separate collection of materials in Northern Ireland and supporting guidance to help clarify the position on current and future collections to help Councils and waste operators in decision making on separate collection.

Of those who answered the questions relating to this proposal, 82% agreed that a review of separate collection requirements is necessary for Northern Ireland in light of proposals under EPR.

In response to what circumstances may prevent separate collection of the core set of materials; funding (17 respondents), participation and contamination (16 respondents), storage and containment (12 respondents) and rural collections (8 respondents) were put forward as the greatest barriers.

Proposal 12: Based on the preceding summary of the key issues, we therefore propose to provide national guidance for Northern Ireland to help establish greater consistency in recycling and waste collection services and reduce confusion for households.

There was significant difference of opinion from respondents on Government publishing national guidance to help establish greater consistency in waste collection services and recycling. Respondents were presented with 3 options, namely (i) statutory guidance with

service requirements, (ii) statutory guidance with minimum service standards and (iii) non-statutory guidance.

Of those who answered, 53% of respondents agreed with Government publishing statutory recycling service guidance to detail service requirements. Approximately 31% disagreed with this approach, with the highest level of disagreement coming from trade bodies and local councils.

In respect of publishing statutory minimum service standards guidance, 64% of those who answered agreed whilst only 18% disagreed.

Nearly 39% of respondents agreed with Government publishing non-statutory guidance whilst 46% disagreed.

Additional comments revealed consensus that introducing statutory minimum service guidance would ensure improved recycling service whilst allowing for local flexibility. The main concern raised was that a 'one size fits all approach' should be avoided and that whilst Government could set targets they should allow local councils to design the services to meet these targets.

Proposal 13: We will continue the support by the Department for Recycle Now and the tools produced by WRAP to help Councils and other campaign partners to communicate effectively on recycling.

The response to this proposal was overwhelmingly positive. Half of all comments directly agreed with the proposal and additional feedback indicated the resources and tools produced by WRAP and Recycle Now have been helpful for local councils. There was a consensus of opinion on the importance of effective communication with householders on a local or national level, the value of working with schools and the wider community.

Respondents believed that the financial and environmental benefits of recycling should continue to be highlighted along with practical information on what can be recycled and how to avoid contamination. A number of respondents also believed information on the end destinations of recycled materials should be shared to build public confidence and dispel the fear that materials collected for recycling are landfilled or incinerated.

Proposal 14: We will work with Councils and others to improve transparency of information available to householders on the end destination for household recycling.

The response to this proposal was very positive with 96% of those who answered agreeing with this proposal. Almost half of all comments discussed the need for improved transparency in end destinations to maintain and boost public confidence in recycling however a number of respondents highlighted the technical difficulties involved in reporting this information. Some concerns were also expressed on the additional administrative

burden this proposal may create for Councils.

Proposal 15: We will introduce statutory regulation in line with the other three UK nations requiring MRFs to report on input and output materials by weight to determine the average percentage of target, non-target and non-recyclable material.

The response to this proposal was very positive, with 92% of those who answered agreeing. The only disagreement was in the local council sector body category where 25% of respondents answered '**Disagree**'. Respondents provided a range of comments on improving reporting on MRF contamination rates including possible increased costs due to additional reporting, external validation of data, consistency of reporting and a wider sampling regime.

Proposal 16: We propose developing an updated set of recycling and waste indicators to monitor performance and cost efficiency and to highlight where services may be improved. We will work with Councils to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

Of those who answered, 84% agreed that a new set of recycling and waste indicators is required. In response to whether any of the current 15 indicators should be removed, there was a fairly even split with 22% of respondents answering '**Agree**', 37% answering '**Disagree**' and 41% answering '**Not sure/ no opinion**'.

Respondents provided a wide range of feedback in relation to specific recycling and waste indicators for household waste. The most common response was the need for a carbon related metric, residual waste per household metric and data on end destination and material quality. There was general consensus that any new indicators must be relevant, useful and allow for comparison whilst not creating additional burden.

Proposal 17: We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these to better measure reductions of carbon emissions associated with waste in Northern Ireland.

There was another very positive response to the questions posed in relation to this proposal. Of those who answered, 92% agreed that alternatives to weight-based metrics should be developed to better understand recycling performance whilst 96% of those who answered believed that these alternatives should sit alongside the weight-based metrics.

There was clear consensus amongst respondents on the need for an environmental metric, with preference for this to be carbon based. Respondents also outlined the need for an economic indicator with local economy specific data, an indicator on end destination and one on the quality of recyclate.

Next Steps

DAERA are thankful to all who took the time to respond to this consultation either via Citizen Space or by providing additional written submissions. We would also like to thank those who attended the stakeholder events. The overall consultation responses to the proposals in the discussion document were very positive. There was broad agreement from respondents for many of the proposals although there was understandably much divergence of opinion on how these proposals can be best achieved.

Transposition of the CEP into domestic legislation in Northern Ireland brings with it very challenging targets in respect of recycling and waste management. Achieving these targets will require a combination of renewed policy focus, legislative changes and targeted communications and support. We will also need to take into account policy developments that arise from the Extended Producer Responsibility and Deposit Return Schemes.

We acknowledge the high level of public and stakeholder interest in recycling and the need to set clear direction. The responses from this discussion document will assist with the formulation of future recycling policy, and they have helped stimulate the discussion on why increased recycling is beneficial to both the environment and the economy. We will now consider the evidence and responses provided in more detail, identifying which proposals will be most beneficial for Northern Ireland, including any necessary legislative changes. All proposed changes will then be subject to further consultation. The specific details of new policy design will be developed further in the months ahead, they will be informed by the range of responses received. We will continue to work with all stakeholders and gather further evidence to develop our future policy further.

We are now at a turning point regarding the management of our resources in Northern Ireland and decisions we make now about the future of waste and resources will have far reaching and long term impacts for climate change, circular economy and Northern Ireland's contribution to the UK's net zero target. Whilst we develop our next steps our immediate focus as we emerge from the Covid pandemic is to re-invigorate recycling rates which have seen a downward trend over the last twelve months. We recognise that we need to normalise recycling behaviours and resume the pre-Covid upward recycling trend. We are currently working with key stakeholders including all local councils on how best to achieve this.

Appendix A

Categorisation List of Respondents

Where respondents could not easily be categorised an 'Other' category was available which included educational institutions and a health care trust. The proportion of respondents by category is shown below:

Householder – **31%**; Business – **9%**; Trade body – **11%**; Non-governmental respondent (NGO) – **7%**; Waste management company – **14%**; Local Council – **16%**; Local Council sector body – **7%**; Other – **5%**.

Respondent categorisation

Householder: 17

Trade body: 6

- Environmental Services Association
- Alliance for Beverage Cartons and the Environment (ACE UK)
- The Association for Renewable Energy and Clean Technology
- Collaborative Circular Economy Network
- Recycle NI
- Chartered Institute of Waste Management (CIWM)

Local Council: 9

- Causeway Coast and Glens Borough Council
- Newry, Mourne and Down District Council
- Ards and North Down BC
- Lisburn & Castlereagh City Council
- Antrim and Newtownabbey Borough Council
- Belfast City Council
- Fermanagh & Omagh District Council
- Mid and East Antrim Borough Council
- Mid Ulster District Council

Local Council sector body: 4

- arc21
- LARAC
- SOLACE NI
- Northern Ireland Local Government Association (NILGA)

Waste Management Company: 8

- Veolia
- RecyCo
- McQuillan Environmental
- RiverRidge

- Enva
- Bryson Recycling
- Biffa
- Re-Gen

NGO 4

- Enagh Youth Forum
- Greenspaces Bangor
- Zero Waste North West
- Sustainable NI

Business: 5

- Translink
- Linen Quarter BID
- Encirc
- Natural World Products Ltd
- Huhtamaki Lurgan Ltd

Other: 3

- Belfast Met
- Ulster University
- Southern Health and Social Care Trust