

# Response ID ANON-H79J-GHNT-K

Submitted to **Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland**  
Submitted on **2020-10-04 17:11:33**

## About you

### 1 What is your name?

**Name:**

Jenny Grant for the Association for Renewable Energy and Clean Technology (the REA).

### 2 What is your email address?

**Email:**

jenny@r-e-a.net

### 3 What is your organisation?

**Name of organisation (if applicable):**

The Association for Renewable Energy and Clean Technology

### 4 What type of organisation are you?

**Organisation:**

Other

**Other (please specify):**

Trade Association

## Proposal 1: Improve the capture of food waste from businesses

### 1 Do you agree or disagree that that the Food Waste Regulations (Northern Ireland) 2015 should be reviewed regarding food waste collections from food businesses?

Agree

If you selected Disagree please explain why?:

### 2 If the Food Waste Regulations (Northern Ireland) 2015 were to be reviewed which of the following areas should be investigated:

**Policy 1 Q2 - Awareness of the Regulations to obligated businesses:**

Strongly Agree

**Policy 1 Q2 - Requirements to separate food from all business types:**

Strongly Agree

**Policy 1 Q2 - Options to amending the regulations for more business types to be in scope of the requirements:**

Strongly Agree

**Policy 1 Q2 - Access to food recycling services for businesses:**

Agree

**Policy 1 Q2 - Charging levels for food waste collection services:**

Agree

**Policy 1 Q2 - Monitoring of business compliance:**

Strongly Agree

**Policy 1 Q2 - Enforcement of business compliance:**

Strongly Agree

**Policy 1 Q2 - Data and reporting of food recycling:**

Strongly Agree

Which other areas of the Regulations, if any, do you think should be investigated? :

## Proposal 2: Require businesses to separate their dry recyclable waste

**3 Do you agree or disagree that all businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?**

Agree

**If you selected Disagree please explain why?:**

**4 Which of the two options do you favour?**

Something else (please explain below)

**Please explain your selection:**

Co-mingled mixed dry recycling with glass included in the same receptacle and separate food/organics recycling makes the most sense economically and is relatively straightforward to implement given the nature of the recycling facilities and collection systems already in place in NI.

This minimises the cost burden on small and micro-businesses (the vast majority of the NI economy) in trying to comply with the desired recycling requirements while still helping to significantly address deficiencies in how commercial waste streams are currently collected and processed.

**5 We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on a preferred position for instances where this may not be practicable for technical, environmental or economic reasons**

Yes - it should be practicable to segregate waste for recycling in all circumstances

**If you selected No - please provide examples below:**

**6 Should some businesses, public sector premises or other organisations be exempt from the requirement?**

No

**If you selected Yes, please tell us which ones and why:**

**7 Do you have any other comments to make about Proposal 2? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?**

**Enter text here:**

Legislative measures are of course a valid option but the importance of effective education and communication should not be underestimated. There have been multiple studies that have shown effective communications are the key to success when implementing a new collection system. These need to be properly resourced and funded. Producer responsibility and ensuring the capacity for effective enforcement of any legislative measures also need to play a role.

### **Proposal 3: Review the impact on rural businesses**

**8 Considering rural needs, what factors should be included in the review of the proposals on non-household municipal waste:**

**Policy 3 Q1 - Cost of recycling services proposed compared to collections in urban areas:**

Yes

**Policy 3 Q1 - Ability to reconfigure services to alleviate cost burden in rural addresses:**

Yes

**Policy 3 Q1 - Access to recycling services in rural areas:**

Yes

**Policy 3 Q1 - Issues with communicating to rural businesses:**

No

**9 List any other factors that should be included in the assessment of the policy proposals that may have a different impact on businesses in a rural settlements.**

List any other factors that should be included in the assessment of the policy proposals that may have a different impact on businesses in a rural settlements.:

### **Proposal 4: Review options to alleviate any cost burden on businesses**

**10 We would welcome views on these options and also evidence of other measures that may be available to support business recycling and to reduce costs for businesses.**

**Policy 4 Q1 - Improving access to drop off sites and HWRCs for business use.:**

Likely

**Policy 4 Q1 - More focus on problem materials such as office furniture, tyres, batteries, printer cartridges, fluorescent lights, fats and oils.:**

Likely

**Policy 4 Q1 - Providing guidance on business advice on optimising/rationalising current services.:**

Likely

**Policy 4 Q1 - Sharing of containers with neighbouring businesses.:**

Very likely

**Policy 4 Q1 - Regional procurement of services to enable economies of scale and reduce charges levied on businesses.:**

Likely

**Policy 4 Q1 - One to one support and advice for businesses.:**

Likely

**Policy 4 Q1 - Clearer information on what materials can be recycled and how.:**

Very likely

**Policy 4 Q1 - On-line tools and calculators to provide information on reducing costs.:**

Likely

**Policy 4 Q1 - Better data to help businesses measure performance and benchmark.:**

Very likely

**Policy 4 Q1 - Standardisation in pricing approaches from private contractors.:**

Unlikely

**Policy 4 Q1 - Combining door to door household and business collections.:**

Unlikely

**Policy 4 Q1 - Better access and availability of kerbside services.:**

Likely

**Policy 4 Q1 - Rewards for businesses that recycle such as incentives, ratings and reduced costs.:**

Likely

**Policy 4 Q1 - Government or Industry subsidised cheaper costs of collection services.:**

Likely

**Policy 4 Q1 - Reviewing cross boundary working options (both local authority and national level).:**

Don't know

**Policy 4 Q1 - Clarity in where and how waste and recyclables are treated.:**

Very likely

**11 What are your general views on the options proposed to reduced costs?**

**Please explain here:**

Any proposals that will increase recycling rates without adding to business costs are to be welcomed, provided they do not add unnecessary financial burdens to local authorities or local government.

Government should also be careful about seeking to interfere in setting market pricing dynamics. That has proved disastrous in the past where well-meaning subsidy schemes have resulted in unintended consequences to both the environment and the public purse.

They can also set false and incorrect cost expectations that businesses/the public/LAs then have to meet when subsidy schemes or DAERA grant funding eventually ceases or runs out.

**12 What might be other viable options to reduce the cost burden that we have not considered?**

**What might be other viable options to reduce the cost burden that we have not considered?:**

N/A

**13 Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?**

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:

Having greater focus on producer responsibility in the non-municipal area will force market dynamics that will ultimately lead to a situation where better recycling practices for businesses are not only desirable but also the most cost-effective way for them to manage their waste streams. This alongside the effective communications will support businesses to make the transition.

## Proposal 5: Improve data reporting from businesses

### 14 Should businesses and other organisations be required to report data on their waste recycling performance?

Yes

If you selected No, please explain why:

### 15 Who should bear the responsibility for reporting data on waste from businesses and other organisations? (Select all that apply)

Producers (businesses and other organisations where waste is produced), Collectors (the organisations responsible for the collection of waste from businesses and other organisations), Re-processors/ treatment facilities (the organisations responsible processing and treatment of waste)

### 16 What specific data sets would your organisation find useful if businesses were required to report under Proposal 5?

Please explain here:

Volumes of residual and Organics tonnages being disposed of annually by the commercial/non-municipal sector in NI.

## Proposal 6: Councils should restrict capacity for residual waste from households

### 17 Do you agree or disagree with the proposal that Councils should be required to restrict residual waste capacity (either by frequency or by residual container volume)?

Agree – local authorities should be required to restrict residual waste capacity, but on the condition of also enhancing the recycling collections. Enhancements to recycling collections could be made by either increasing the range of materials collected, increasing the frequency of the recycling collections, or increasing the available recycling container capacity.

### 18 Assuming there will be necessary exemptions for key property types, do you have any preference with the proposals below that Councils should be required to restrict the residual waste in different ways? (Note that Q17 looks at possible enhancements that could be made to possible restrictions of residual waste)

Agree – Councils should be required to restrict residual waste by reducing the collection frequency while retaining the same size container

### 19 If residual restriction was to be implemented which enhancements should be made to the recycling service to help increase performance and ensure consumers are satisfied with the overall services offered? (Select all that apply)

Increased frequency of the dry recyclables collection, Increased frequency of the food recycling collection, A larger container capacity for the dry recyclables collection

Other (please specify):

While reducing the amount of residual waste is an imperative, any decision to restrict capacity for residual waste should be based on sound evidence that this will lead to increased capture rate of materials for recycling.

Going too far on any restriction of residual waste capacity could inevitably lead to higher levels of contamination in recycling streams – which could significantly undermine the effort to recycle more, as quality of recyclates is more and more becoming a critical issue and increasing contamination levels will have very significant negative impacts on costs and desired environmental outcomes.

## Proposal 7: Councils to provide all households with a weekly food waste service

### 20 Which aspects of the proposal do you agree and disagree with?

Policy 7 Q1 - (i) at least a weekly collection of food waste:

Agree

Policy 7 Q1 - (ii) a separate collection of food waste (i.e. not mixed with garden waste):

Disagree

Policy 7 Q1 - (iii) a weekly mixed food and garden waste collection:

Agree

Policy 7 Q1 - (iv) services to be changed only as and when contracts allow:

Agree

Policy 7 Q1 - (v) providing free caddy liners to householders for food waste collections:

Agree

Please provide any additional comments below:

Any decision to force LAs to change the method, type or frequency of their organics collection should be based on sound evidence tested in Northern Ireland that supports the desire for increased overall recycling rates and favourable economic outcomes for LAs.

One of our members, Natural World Products based in NI has provided detailed data in their response to this consultation. This is based on their experiences on the ground in NI and should be considered carefully.

We believe councils should be empowered to make their own decisions, including on whether to move to at least weekly collections based on evidence that balances any potential increase in recycling rates with the cost of implementation in their own areas and based on local circumstances.

This will enable individual local authorities to take account of their own contractual situations and the end technologies associated with the recycling of organics in their areas.

It is also important for the final destination of the recycled organics, i.e. soil to be considered. Organic materials play an essential role in improving and maintaining the health of the soil. Digestate can provide readily available plant nutrients and are effective fertilisers whilst composts provide valuable organic matter, help store carbon and improve the soil quality.

The needs of the local environment and soil should be considered along with the impact on implementing collections etc to ensure that the policies introduced enable the outputs from organics recycling to be properly valued by the end users.

Quality is an essential consideration too. The quality of materials collected for organics recycling has a direct impact on the quality of the organic materials applied to soils. Policy needs to ensure that materials collected are suitable for processing and that the composts and digestates produced are fit for purpose.

## **Proposal 8: Councils to collect a core set of dry recyclable materials from all households**

**21 Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that Councils should be required to collect a set of core materials for recycling?**

Agree – Councils should be required, to collect a core set of materials

**22 We think it should be possible for all Councils to collect the core set of materials. Do you agree with this?**

Agree

**If you disagree please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials :**

**23 What special considerations or challenges might Councils face in implementing this requirement for existing flats and Houses of Multiple Occupancy (HMOs)?**

Enter text here:

**24 Do you have any other comments to make about Proposal 8? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals?**

Enter text here:

## **Proposal 9: The defined core set of materials for household collections**

**25 Do you believe that all of these core materials should be included or any excluded?**

**Proposal 9 - Q1 - Glass bottles and containers:**

This should be included in the core set, but phased in over time

**Proposal 9 - Q1 - Paper and card:**

This should be included in the core set, but phased in over time

**Proposal 9 - Q1 - Plastic bottles:**

This should be included in the core set, but phased in over time

**Proposal 9 - Q1 - Plastic pots tubs and trays:**

This should be included in the core set, but phased in over time

**Proposal 9 - Q1 - Steel and aluminium tins and cans:**

This should be included in the core set, but phased in over time

**26 What other products or materials do you believe should be included in the core set that all Councils will be required to collect?**

**Proposal 9 - Q2 - Plastic bags and film:**

Not sure/don't have an opinion/not applicable

**Proposal 9 - Q2 - Black plastic food and drink packaging:**

Not sure/don't have an opinion/not applicable

**Other materials (please specify) :**

**27 If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?**

Enter text here:

**28 Do you have any other comments to make about Proposal 9?**

Enter text here:

**Proposal 10: Review the set of core materials regularly and expand over time provided that conditions are met**

**29 Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?**

Yes

**30 Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?**

Not sure/don't have an opinion

If you selected YES, please specify which conditions you believe should be added:

If you selected NO please specify below:

**31 Do you have any other comments to make about Proposal 10?**

Enter text here:

**Proposal 11: Review the separate collection requirements for Councils and provide supporting guidance**

**32 Do you agree that a review of separate collection requirements is required for Northern Ireland to inform municipal collections in light of proposals for core sets of recyclable materials and new producer obligations under Extended Producer Responsibility (EPR)?**

Yes

If you selected No - please provide examples below:

**33 What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible. Additional supporting evidence for your statements may be emailed to: [recyclingdiscussion@daera-ni.gov.uk](mailto:recyclingdiscussion@daera-ni.gov.uk)**

Enter text here:

**Proposal 12: Provide national guidance for NI on greater consistency in services for households**

**34 What would be your preferred approach to Government encouraging greater national consistency in collection services?**

**Proposal 12 Q1 - Publish Statutory recycling service guidance to detail service requirements?:**

Disagree

**Proposal 12 Q1 - Publish Statutory minimum service standards guidance?:**

Disagree

**Proposal 12 Q1 - Publish non-statutory guidance?:**

Agree

**35 Do you have any further comments to make about the proposal outlined above?**

Enter text here:

As the statutory responsibility to collect waste lies with the local authorities in Northern Ireland, they should be involved in any work to produce new guidance.

**Proposal 13: Support national campaigns to communicate effectively on recycling**

**36 Do you have any comments to make about Proposal 13?**

Enter text here:

Clear communication and education of householders is vital and must be on-going and sustained.

**37 What information do householders and members of the public need to help them recycle better?**

Enter text here:

Improved messaging and communications on the importance and impact of recycling is essential.

In relation to the collection of food and garden waste, there is a requirement for greater understanding of the positive impact this can have on the environment and the fight against climate change, which can also align with DAERA's Green Growth strategy.

Education programmes should focus on the potential benefits for Soil Health and the Carbon Sequestration impact of organic composts and digestates. Soil health is likely to be one of the key areas of focus globally in the fight against climate change. Organics recycling and its products contribute positively to tackling environmental challenges by avoiding the production of methane from landfill, providing a source of renewable energy, providing a range of readily available and slow released plant nutrients, returning organic matter to soil, increasing the carbon held in soils and improving the soil structure to enable it to be more resistant to erosion and other climate change impacts. It is important that the benefits are acknowledged and communicated widely.

#### **Proposal 14: Improve transparency of information on the end destination of recyclables**

##### **38 Do you agree or disagree with this proposal?**

Agree – government should work with Councils and other stakeholders on this

##### **39 Do you have any other comments to make about Proposal 14?**

**Enter text here:**

As stated in response to Proposal 13, there is a lack of understanding on the final destination of food and garden waste sent for recycling, its role in fighting climate change and helping the circular economy.

#### **Proposal 15: Introduce regulation which requires Materials Recovery Facilities (MRFs) to report the detail of input and output materials**

##### **40 Do you agree or disagree with this proposal?**

Agree – government should introduce regulation on MRF reporting

##### **41 Do you have any comments or ideas for improving reporting on MRF contamination rates?**

**Enter text here:**

#### **Proposal 16: Develop an updated set of indicators to monitor overall performance and cost efficiency**

##### **42 Do you agree or disagree that a new set of recycling and waste indicators is required?**

Agree

##### **43 Do you consider that any of the current set of 15 indicators should be removed?**

Disagree

##### **44 If you selected Agree in Q43, which indicators do you think should be removed?**

**Enter text here:**

##### **45 Are there any specific recycling and waste indicators for household waste which you think should be included?**

**Enter text here:**

A KPI measuring the overall carbon savings achieved from specific forms of recycling to capture associated carbon sequestration benefits.

##### **46 Do you have any general comments to make about performance Indicators?**

**Enter text here:**

They need to be holistic and not encourage practices that may look like they are achieving something positive in one area but are, actually, harming the environment somewhere else.

There is a concern that local authorities may choose to relax key standards in procurement exercises to send their materials to the lowest-cost solution, even where those plants/recycling facilities are entirely unprepared or equipped in reality to effectively deal with significant volumes of municipal waste streams in an environmentally sound and safe manner.

Minimum standards around experience, financial viability, safety and environmental quality protocols (e.g. ISO) that are all capable of external and independent third-party audit and verification must surely form part of any responsible procurement practices from Councils into the future.

#### **Proposal 17: Review metrics that focus on environmental emissions from waste in Northern Ireland**

##### **47 Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?**

Agree

**If you selected Disagree, please explain why:**

**48 Do you agree that these alternatives should sit alongside current weight-based metrics?**

Agree

**If you selected disagree, please explain why:**

**49 What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?**

**Enter text here:**

A carbon metric, alongside the existing weight-based metric would enable progress to Net-Carbon to be measured.

A carbon intensity metric would aid an organisation's analysis and evaluation of the benefits of preventing and recycling waste helping identify the materials which cause the most damage to the environment and therefore focus on those specific materials which produce the highest carbon impacts and the greatest possible carbon savings.

Understanding the carbon impacts associated with our waste is imperative in helping to address the global climate challenge. This is because the use of various material contributes substantially towards greenhouse gas emissions and thus to the overall global climate change crisis.

Lessons should be learned from Scotland's experiencing following the introduction of such a metric. For example. In 2011 the impact of Scotland's waste was the equivalent of 2.3m flights compared in 2016 it was equivalent 1.7m flights. The average carbon footprint in Scotland 2016 was 2.83 tonnes in comparison to 2.4 tonnes in 2016 (the equivalent of 1.7m cars off the road in one year).

A metric considering the levels of organic matter we are returning to soils from our organic waste streams over time could also be considered.