

## **REA Response to Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI**

### **ABOUT THE REA**

The Association for Renewable Energy and Clean Technology (the REA) is a not-for-profit trade association, representing British renewable energy producers and clean technology and promoting the use of renewable energy in the UK. It has around 550 corporate members, making it the largest renewable energy trade association in the UK.

The REA's Organics and Natural Capital forum and its Biogas forum together comprise 422 members, numerous of which operate commercial composting facilities, commercial scale anaerobic digestion (AD) facilities and recycle organics to land. The REA works with stakeholders with the aim of achieving policy and regulatory frameworks for renewables and organic waste recycling that deliver an increasing contribution to the UK's electricity, heat, recycling, and transport needs. More info available at [www.r-e-a.net](http://www.r-e-a.net).

### **THE CONSULTATION**

On 7 March 2024, the Northern Ireland Department for Agriculture, Environment and Rural Affairs (DAERA) published a consultation titled 'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI.' The consultation hopes to gather information to inform policies that will improve the quality and quantity of household and non-household municipal recycling, reduce food waste, cut landfill rates, and get businesses on board to increase recycling rates.

The first part includes twelve proposals to improve commonality in collections from households, and the second part includes fourteen proposals for improving recycling for non-household municipal waste (NHM). The consultation webpage ([here](#)) includes a full consultation document ([here](#)) and associated annexes. The consultation will close at 5 PM on Thursday, the 27th of June.

### **OUR RESPONSE**

This response focuses on the questions related to Circular Bioresources.

Answers are in green.

### Proposal 1: Household Waste – Restriction of Residual Waste

1. Do you agree with the proposal to restrict the capacity of residual waste for average households to a maximum of 90 litres per week? Some households may require additional containment or alternative arrangements (see question 6).

REA supports the proposal to restrict the capacity of residual waste for average households to 90 litres per week. As people recycle more, they require less residual waste capacity. Evidence from WRAP indicates that where residual waste capacity is restricted, recycling services perform better. For the successful delivery of restricted residual waste capacity, LAs should be required to measure and report the amount of food waste that remains within the residual waste stream. This will help NI to understand how successful the restriction and associated changes to food and garden waste recycling have been and identify what additional support may be needed to improve household recycling behaviours.

2. Some Councils may not be able to restrict the capacity of residual waste by the date proposed (within 24 months of notification of a statutory requirement). In this table we set out some circumstances which may delay changes to residual waste restriction. Please complete the table, providing evidence with justification as to why timescales should be extended, as appropriate. Not all rows need to be completed. Please use N/A where not applicable.
  - a. Contracts for residual waste treatment
  - b. Procurement processes for new containers
  - c. Manufacturing capacity for new containers
  - d. Project outcomes from residual waste reduction action
  - e. Cost burdens
  - f. Ability to resource and mobilise within the required timescale
  - g. Other

The restricted capacity should be introduced as soon as technically, environmentally and economically possible and councils should have to provide a justification as to why they cannot comply and endeavour to bring their service into compliance as soon as possible.

3. If the proposal to restrict the capacity of residual waste for households is adopted, what is your preference for how this should be delivered? (180 litre capacity bins collected fortnightly, 240 litre capacity bins collected three weeklies, Other)

By diverting food waste via effective food and garden waste collections (in whatever form an LA chooses), the component of the waste stream most likely to cause odours should no longer be present in the residual waste bin. In addition, when the frequency of collections is reduced, waste services are more cost effective and environmentally efficient to deliver. Therefore, we do not believe there is any reason to mandate fortnightly collections. Instead, we support allowing LAs to decide how frequently they deliver waste collections based on their local circumstances.

4. Do you agree that forms of restricted capacity for residual waste collections should apply to all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin?

We do not believe restricted capacity should apply to households that do not have individual bins allocated to each separate dwelling. There is no oversight of communal bins which gives residents the ability to use more than their share of the residual waste capacity, infringing on other residents' rights to dispose of their residual waste. By reporting on the composition of

residual waste, this will enable LAs to target communications to areas where recyclables and organics remain present in the residual bin.

5. Do you agree that restricted capacity for residual waste collections should be rolled out across NI simultaneously (or as near as possible) to assist local councils with communicating the changes to households?

Communicating changes to households will be essential for ensuring householders are able to adapt to the new restrictions appropriately. Therefore, REA supports a simultaneous roll-out accompanied by national and local-level communication campaigns. DAERA should provide monetary support to LAs as they educate households about changes to municipal waste collections and appropriate organic and dry recycling practices.

6. Do you agree that households who demonstrate that they meet the following criteria could be provided with more than the maximum of 90 litres per household per week?
  - a. Household comprises of more than 6 residents: **Yes agree**
  - b. Households where citizens have medical conditions which produce additional waste: **Yes, agree**
  - c. Households where there are more than two children using disposable nappies: **Yes, agree**
  - d. All households in the collection after Christmas break where presentation of a restricted amount of site waste is acceptable: **Disagree. Most waste produced at Christmas is recyclable (i.e. boxes and food waste) and should be disposed of via recycling channels. If the residual waste restriction is removed on Christmas, then DAERA should also consider other holidays where the restriction is removed.**
  - e. Other:

#### Proposal 10: Household Waste – Food Waste Collections

1. We have listed possible collection methods for food waste from kerbside properties below, some of which we consider are suitable short term. How would you rank the following options for food waste collections, where 1 is most preferred and 4 is least preferable? If you consider that some options are not viable, please do not include these in your ranking, in which case, please rank only one, two or three option(s).
  - a. A separate weekly collection of food waste with additional arrangements for garden waste
  - b. A weekly mixed food and garden waste collection
  - c. A separate fortnightly collection of food waste with additional arrangements for garden waste
  - d. A fortnightly mixed food and garden waste collection.

The REA strongly supports the rights of LAs to choose what type of food and garden waste works best for their local circumstances. The priority should be maximizing the amount of biowaste that is separately collected. We do not believe that separate collections of food and garden waste are necessary for building an environmentally and economically efficient organic waste recycling industry in Northern Ireland.

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 favorable economic outcomes for LAs. One of our members based in NI, Natural World Products, has provided detailed data in their response to this

consultation that contradicts the data provided in support of this proposal. This is based on their experience on the ground in NI and should be considered carefully.

It is also important for the **final destination of the recycled organics** (i.e. soil) is considered. Soil in NI has high levels of phosphate and ammonia pollution. While digestate can provide readily available plant nutrients and act as effective fertilisers, it is not always the best option for every circumstance. Composts provide valuable organic matter that can rejuvenate soils, and dry-AD provides an alternative organic recycling method that produces biogas without the significant liquid digestate output found in wet-AD. Both composting and dry-AD use co-mingled food and garden waste as feedstocks. These recycling processes are equally important as wet AD in NI's move towards a circular economy and healthier soils.

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

Separate food waste collections (i.e., separate from garden waste) may be appropriate for some areas but this should not be seen as the only option. We believe councils should be empowered to make their own decisions based on their circumstances. This will enable individual LAs to take account of their own contractual situations and the end technologies associated with the recycling of organics in their areas. We are aware of examples where co-mingled food and garden waste collections result in food waste tonnages comparable to the estimated tonnage from separate food waste collections. These include East Riding of Yorkshire, Manchester, Stockport, Rochdale, and Trafford. There are also examples of LAs with top 20 overall recycling rates who offer co-mingled food and garden waste collection. This is why local decision making is important. High recycling performance and achieving the overall policy objective of diverting food waste from the residual bin should be the priority, leaving the approach to be decided by individual LAs.

2. Do you agree with our proposal that all kerbside properties should in future have access to a least a weekly collection for food waste to increase capture rates of food waste?

While we agree that weekly kerbside organic waste collections would be beneficial, we also 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.

3. Do you agree that all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin should have access to at least a weekly collection for food waste?

We support frequent food and garden waste collections for all households, including dwellings with communal bins, but also support LAs ability to make their own decisions about collection frequency.

4. Do you agree that councils should be required to implement a weekly food waste collection service from kerbside properties, keeping food and garden waste separate, by the points in time listed below?
  - a. 24 months from notification of statutory requirement
  - b. 3 to 4 years from notification of statutory requirement

- c. More than 4 years from notification of statutory requirement
  - d. Never
  - e. Other
5. Do you agree that guidance should be provided on caddy liners, including on caddy liner material types?

REA does support evidence-based guidance on caddy liner material types.

Compostable liners have been shown to lead to **reduced levels of non-compostable plastic contamination** in organic waste feedstocks (see <https://www.r-e-a.net/resources/sepa-report-on-compost-feedstock-quality/>). This study looked at physical contaminants (with emphasis on plastic contaminants) in domestic and commercial food wastes which shows that the provision of compostable food caddy liners by LAs leads to lower plastic contamination). REA analysis of some of the study's Table 2 data found that where LAs provided compostable caddy liners, total non-compostable plastics (bags/liners and plastic inside the bags) was 0.224%. This is 1.46 times lower than 0.327% w/w contamination found where LAs did not provide compostable caddy liners.

Reducing contamination in organic waste feedstocks (1) allows the biowaste recycling and recovery sector to produce the high quality composts and digestates efficiently, (2) maximises benefits from biowaste recycling and recovery, (3) minimises any potential impact of plastic contamination on the environment, and (4) reduces the millions of pounds the UK's organic recycling industry spends annually on removing and sending incompatible plastics and other contaminants to waste recovery or landfill.

The REA and contributing organisations have developed **a policy on liners and re-purposed bags**. See <https://r-e-a.net/resources/policy-on-and-liners-and-re-purposed-bags/>. This policy covers liners and re-purposed bags suitable for collecting food waste from households, businesses, and non-domestic premises.

All liners or re-purposed bags provided to households should be **independently certified** compliant with BS EN 13432 or BS EN 14995, regardless which material(s) are in them. (The former standard covers packaging 'intermediate materials and packaging finished products made of any material types that can meet its criteria, while the latter standard covers plastic products.) Both standards include 1) disintegration and biodegradation criteria for assessing their suitability for industrial scale composting and 2) disintegration and biodegradation criteria for assessing their suitability for AD-followed-by-short-composting-phase processes.

REA's policy is not only applicable to independently certified compostable (or AD-compostable) plastic bags and liners. E.g. paper bags and liners must have a valid certificate because they often have glued seals and printed on ink(s) which need to be checked for composability. If 'fibre-based composite' bags and liners were to be developed, these too must have a valid certificate.

Our policy facilitates higher quality and higher yields of compost and digestates produced from organic recycling and recovery of separately collected biodegradable wastes, and reduced risks of pollution by persistent-in-the-environment plastics when composts and digestates are spread on land. REA's policy and other evidence should be considered when developing guidance on provided caddy liners and re-purposed bags for food waste collection.

We acknowledge that current food-waste-fed wet-AD facilities in NI may not have reception hall set-ups and equipment that enables them to front-end remove compostable liners/bags

separately from non-compostable plastics/packaging, or to positively select compostable bags/liners from the facility's rejects stream and send those compostables for IVC treatment.

Shortly, the Compostable Coalition UK will be publishing findings on trials that autoclaved a range of compostable products and determined the Biomethane Potential of autoclaved floc that passed through a post-autoclave screen. Samples of a manufacturer's certified industrially compostable carrier bag product tested as part of these trials.

Solids-based dry-AD processes with one or more post-AD composting phases have potential to feed in certified compostable bags/liners and certified digestible-compostable bags/liners without pre-treatment such as autoclaving. Other dry-AD processes that rely on pumping 'high-solids' biowastes after particle-size-reducing and hydrolysing biowastes would need to be researched regarding whether additional pre-treatment of certified bags/liners would be necessary.

6. Do you agree that caddy liners should be provided free of charge to citizens that participate in food waste collection? (Please select only one option)
  - a. Yes, via Council offices, libraries, leisure centres, etc.
  - b. Yes, as in (1) and via citizens adding their own note to their food waste containers to request new liners which crews deliver
  - c. Yes, as in (1) and via a tag supplied in the roll of caddy liners that is attached to the food waste container by the citizen when their supply is low. Crews deliver new liners.
  - d. Other method
  - e. No - citizens should purchase their own liners

It is well known that supplying liners for kitchen food waste caddies and kerbside food waste bins increases the amount of food waste that is separately collected, diverting more organic waste from residual waste bins. Householder surveys carried out by WRAP in 2008-2009 ([https://www.wrap.org.uk/sites/files/wrap/HH\\_food\\_waste\\_collections\\_guide\\_section\\_4\\_caddies\\_and\\_liners.pdf](https://www.wrap.org.uk/sites/files/wrap/HH_food_waste_collections_guide_section_4_caddies_and_liners.pdf), section 4.2, pages 5 – 6) suggests that participation in food waste recycling would be significantly affected if supplies of free liners were removed and residents were required to purchase liners from retailers. More recent research from WRAP found that householders without ongoing or adequate liner supplies tended to stop participating in food waste recycling.

WRAP's Household Food Waste Collection Guide (<https://wrap.org.uk/resources/guide/household-food-waste-collections-guide>) also highlights that 'providing householders with a combination of well-designed internal and external containers plus a supply of caddy liners supported by quality communication materials can help ensure good engagement and good participation and capture rates' for organic waste recycling. Therefore, REA agrees that local authorities should provide caddy liners to householders. We support an 'upon request' basis if it is timely, and no householder runs out of suitable caddy liners. The cost provision of liners should be covered by additional burden funding from the Government.

#### Proposal 11: Household Waste – Compliance and Enforcement

1. Do you agree that section 21 of the Waste and Contaminated Land (Northern Ireland) Order 1997, as amended, should be clarified to set out the circumstances in which Councils can enforce householders to place items of waste and recycling in certain

receptacles and the levels of fixed penalty notice that could be levied where householders do not comply?

REA supports the proposal to allow LAs to levy fixed penalty notices when householders place the wrong materials in waste and recycling bins. However, we also strongly encourage property funding for effective education and communications about appropriate recycling practices. Education is the single biggest factor for increasing the recycling of food and garden waste and improving the quality of materials collected. It is essential that this is delivered on an on-going basis, not just during the roll-out of changes, to ensure long-term awareness of what materials are accepted. Studies have demonstrated that education programmes, along with the correct tools (i.e. kitchen caddies and liners for food waste) have resulted in increased capture rates, lower levels of contamination and a reduction of food waste in the residual bin. Therefore, any penalties that are introduced to improve recycling rates should be predated by well-constructed, thoughtful education and communication to householders about their responsibility to dispose of their waste correctly.

2. Do you agree that the following options should be adopted to help to improve the quality of recycling collected from households:
  - a. Issuing standardised information in the form of leaflets to citizens at least annually: **Yes, agree**
  - b. Crew training on how to manage containers with the wrong items: **Yes, agree**
  - c. Oversight of crew working practices: **Yes, agree**
  - d. Better support to crews and recognition of their work: **Yes, agree**
  - e. Clear and updated visually appealing websites: **Yes, agree**
  - f. Other: **Local authorities should receive dedicated funding for targeted communications campaigns to householders about proper waste disposal practices.**
3. If a Fixed Penalty Notice system were to be levied where people continue to put the wrong items in their recycling containers, which of the values proposed for the Fixed Penalty Notice do you consider to be appropriate?
  - a. £50
  - b. £75
  - c. **£100 (existing value)**
  - d. £150
  - e. £200

REA supports the existing penalty. However, we also believe LAs should conduct periodic waste analysis. This should be an ongoing, long-term data collection practice so that penalties can be re-evaluated to be sure they are effective in discouraging improper waste disposal.

#### Proposal 16: Non-Household Municipal Waste – Food Waste

1. Do you agree with our proposal that will require the separate collection of the food waste from all businesses and the wider NHM sector within 24 months of notification of a statutory requirement?

Yes.

REA supports separate collection of food waste from all businesses and the wider NHM sector within 24 months of notification of a statutory requirement. Most businesses producing food waste do not also produce garden waste. Therefore, separate food waste collections should not be that difficult to implement.



2. Do you agree that the Food Waste Regulations (Northern Ireland) 2015 should be extended to require all obligated businesses, public bodies, and other organisations to segregate food waste for separate collection?
  - a. Yes, agree - the Regulations should be extended to cover all obligated businesses, public bodies and other organisations, no matter of their size or nature. (If yes, go to Q7)
  - b. No, disagree – the Regulations should not be extended to cover all obligated businesses, public bodies or other organisations, no matter of their size or nature, some exemptions or phasing should apply.
7. To what extent do you agree that the measures we have proposed will increase the recycling of food waste from obligated businesses, public bodies, and other organisations? Please provide evidence to support your answer if possible: Agree
8. Are there any further measures that you would like to see included over and above our proposals that would improve the recycling of food waste by obligated businesses, public bodies, and other organisations? Please provide supporting evidence for any proposed measures.

REA supports implementing mandatory reporting for food surplus and waste by businesses. We would like as many businesses as possible to analyse and report their food waste data, as a requirement to report would mean businesses are measuring food waste. The measurement of food waste makes it more visible and allows for more effective actions to reduce it.

While legislative measures to improve NHM waste collections are essential, 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 an effective waste collection service. These need to be properly resourced and funded.

Producer responsibility and ensuring the capacity for effective enforcement of any legislative measures is also critical.

#### Proposal 17: Non-Household Municipal Waste – Food Waste Treatment

1. We propose that anaerobic digestion is the preferred method for treating separately collected food waste, where suitable, but composting is also permitted. Do you agree with this view?

REA supports a technology neutral approach. There are many benefits of applying both compost and digestate to land, as detailed by the report, 'Benefits of compost and AD when applied to soil' published by the International Soil Waste Association. Digestate is rich in readily available nutrients and can reduce the need for fossil-derived fertilisers to help decarbonise farming, while compost is an excellent soil improver that can enhance soil structure, improve water retention, reduce soil erosion, support plant growth, and increase biodiversity. Wet-AD, dry-AD, and composting are all necessary for the effective and efficient recycling of organic waste to land.

#### Proposal 21: Non-Household Municipal Waste – Recycling Collections

1. Do you agree that the range of proposals set out by DAERA in this consultation once implemented, will sufficiently ensure that NHM recycling collections focus on segregating recyclable waste from residual waste alongside improving the quality and quantity of recycling?



REA agrees that the proposals to separate recyclable waste from residual waste for non-household premises are a step in the right direction. However, these changes need to be supplemented by government-funded communications and education campaigns that teach households and non-household premises proper waste disposal practices. DAERA needs to also ensure that enforcement resourcing and capacity is adequate to enforce equal adoption of regulation across NI.

#### Proposal 22: Non-Household Municipal Waste - Making Costs Manageable

1. What are the main barriers that obligated businesses (small and micro-firms in particular), public bodies and other organisations face when trying to recycle? Please select one option for each barrier listed.
  - a. Financial: **some barrier**
  - b. Contractual: **some barrier**
  - c. Space: **some barrier**
  - d. Engagement: **some barrier**
  - e. Location: **some barrier**
  - f. Time and Expense of Staff Training: **some barrier**
  - g. Enforcement: **large barrier**
  - h. Lack of awareness or understanding of how to recycle more waste: **some barrier**
  - i. Other
2. Which type(s) of business support do you believe would be most useful for obligated businesses, public bodies, and other organisations to ensure they understand their obligations and enable them to recycle more of their waste? (Select any number of responses)
  - a. 1:1 support provided/offered to obligated businesses and organisations: **useful**
  - b. National, regional, or local communications campaigns: **very useful**
  - c. National guidance and good practice studies: **very useful**
  - d. Dedicated website including online business support tools: **useful**
  - e. Other:
3. If adopted, and it became a legal requirement for those obligated businesses, public bodies, and other organisations to segregate a core list of dry recyclables for collection alongside food waste, how do you believe such regulatory change should be promoted or communicated?
  - a. National, regional, and local communications campaigns i.e., TV adverts, social media campaigns, adverts in trade, national or local press, webinars: **Yes**
  - b. Guidance and/or notification provided directly to all obligated businesses and organisations via the relevant regulatory bodies (local councils, NIEA) i.e., emails, written notification: **Yes**
  - c. Guidance and/or notification provided to obligated businesses and organisations via their existing waste or recycling collector: **Yes**
  - d. Guidance and/or notification provided to obligated businesses and organisations via relevant trade bodies or umbrella associations, Chambers of Commerce etc. i.e., newsletters, social media, workshops, conferences, or webinars: **Yes**
4. Do you have any views on how Government should further support obligated businesses, public bodies, or other organisations to procure waste management services more collaboratively? Please select all the options which you think should be considered
  - a. Promote existing collaborative opportunities relating to waste management so that obligated premises can access these easier: **Yes**

- b. Develop new procurement framework opportunities for waste management services that obligated premises can use collaboratively to gain best value: **No**
- c. Develop standard contract templates that groups of obligated premises can utilise to collaboratively source waste management services: **No**
- d. Collaborate with key industry organisations or accredited associations to develop waste management framework opportunities suitable to specific industry sectors i.e., transport, retail, hospitality: **Yes**

REA supports the use of templates where appropriate but these need to be carefully considered with input across the supply chain, so they are fit for purpose. We have seen examples elsewhere where template contracts have not been developed with input from treatment facilities resulting in some issues with regards to quality.

#### Proposal 24: Non-Household Municipal Waste – Zoning and Franchising

1. Which recyclable waste streams do you believe should be included under a potential franchising/zoning scheme available for use by obligated businesses, public bodies, and other organisations? For each option, please select whether you agree, disagree, or are not sure/do not have an opinion/not applicable.
  - a. Dry recyclable material streams **N/A**
  - b. Food waste **Disagree**
  - c. Other (oils, hazardous waste, bulky waste) **N/A**

We strongly disagree with the proposals for commercial waste zoning. This idea is fraught with difficulty, and we are concerned about the impact of this and that it will undermine existing service providers. Once a contract has been awarded for a particular geographic area, this will eliminate competition, reduce flexibility, innovation and drive down the level of service that the winning tenderer will deliver. We believe that it might face a legal challenge if implemented on a large scale as it is anti-competitive. There is huge potential for this to damage the waste and resource sector and lead to job losses and a reduction in investments. There are other ways to achieve the aims such as reducing vehicle movements and improving air quality which won't have the same devastating impact on service providers

2. Which of the below options, if any, is your preferred for zoning and/or collaborative procurement? Please select only one option that most closely aligns with your preference.
  - a. Encouraging two neighbouring businesses to share the same containers under a contract.
  - b. **Encouraging businesses to use shared facilities at a site/estate or equivalent.**
  - c. Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in)
  - d. Co-collection – the contractor for household collection services also delivers the NHM service.
  - e. Framework zoning – shortlist of suppliers licensed to offer services in the zone.
  - f. Material specific zoning – one contractor collects food waste, one dry recyclables, one residual waste.
  - g. Exclusive service zoning – one contractor delivers the core recycling and residual collection waste services for the zone.
  - h. None of the above
  - i. Other (please detail)

3. Do you have any views on the roles of stakeholders in implementing a potential zoning/franchising scheme. Please select where you think the named stakeholder should have a role in each of the following activities:
  - a. Procurement of services
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations
    - vi. Waste producers i.e., businesses, public bodies, etc.
    - vii. Trade body, umbrella associations, accredited bodies
    - viii. Other
  - b. Scheme/collection service design
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations
    - vi. Waste producers i.e., businesses, public bodies, etc.
    - vii. Trade body, umbrella associations, accredited bodies
    - viii. Other
      1. Waste Treatment Provider
  - c. Admin and day to day management
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations
    - vi. Waste producers i.e., businesses, public bodies, etc.
    - vii. Trade body, umbrella associations, accredited bodies
    - viii. Other
  - d. Enforcement (ensuring zoning rules are adhered to)
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations
    - vi. Waste producers i.e., businesses, public bodies, etc.
    - vii. Trade body, umbrella associations, accredited bodies
    - viii. Other
  - e. Business support/advice
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations
    - vi. Waste producers i.e., businesses, public bodies, etc.
    - vii. Trade body, umbrella associations, accredited bodies
    - viii. Other

- f. Development of tools and guidance
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations
    - vi. Waste producers i.e., businesses, public bodies, etc.
    - vii. Trade body, umbrella associations, accredited bodies
    - viii. Other
  - g. Delivery of communications campaigns
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations
    - vi. Waste producers i.e., businesses, public bodies, etc.
    - vii. Trade body, umbrella associations, accredited bodies
    - viii. Other
  - h. Other activities
    - i. DAERRA
    - ii. NIEA
    - iii. Councils
    - iv. Business Improvement Districts
    - v. Environmental Non-Governmental Organisations Waste producers i.e., businesses, public bodies, etc.
    - vi. Trade body, umbrella associations, accredited bodies
    - vii. Other
4. If you think that there is a role for any other stakeholders not already listed, please name the stakeholder below and state what activities you believe they should be involved in.
5. Do you have any further views on how a potential waste or recycling collection franchising or zoning scheme could be implemented?

While we have answered the questions above relating to stakeholders involved in rolling out the proposed franchising/zoning scheme, we strongly disagree that any such scheme should be implemented in NI.

#### Proposal 26: Non-Household Municipal Waste – Compliance

1. Do you agree that our proposal to extend Article 5 of the Waste & Contaminated Land (NI) Order 1997 will be sufficient to ensure compliance with the proposed requirements to segregate a core set of dry recyclables and food waste by obligated businesses, public bodies, and other organisations?

REA supports preparing and issuing a code of practice related to the separate collection of dry recyclables and food waste by obligated parties, but this should be supplemented with adequately resourced education, enforcement, and monitoring.

2. Do you agree that the existing penalty of £300 for non-compliance for obligated businesses, public bodies and other organisations is severe enough to ensure compliance? If you answer no, what value do you feel the fixed penalty notice for non-compliance should be increased to?

REA supports the existing penalty. However, we also believe that periodic analysis of NHM waste should be conducted. This should be an ongoing, long-term data collection practice so that penalties can be re-evaluated to be sure they are effective in discouraging improper waste disposal.

### **Out of Scope Proposals**

[Proposal 2: Household Waste – Dry Recyclables](#)

[Proposal 3: Household Waste – Additional Materials \(Dry Recyclables\)](#)

[Proposal 4: Household Waste – QualiTEE as a Term](#)

[Proposal 5: Household Waste – Default Position for Dry Recyclables](#)

[Proposal 6: Household Waste – Standardised Written Assessments](#)

[Proposal 7: Household Waste - Conditions to Define QualiTEE](#)

[Proposal 8: Household Waste – Quality Recyclables](#)

[Proposal 9: Household Waste – Mixing Plastics and Metals](#)

[Proposal 12: Household Waste – Non-Statutory Guidance](#)

[Proposal 13: Non-Household Municipal Waste – Out of Scope Producers](#)

[Proposal 14: Non-Household Municipal Waste – Core Set of Dry Recyclables](#)

[Proposal 15: Non-Household Municipal Waste – Flexible Plastic Packaging](#)

[Proposal 18: Non-Household Municipal Waste - Default Position](#)

[Proposal 19: Non-Household Municipal Waste - QualiTEE](#)

[Proposal 20: Non-Household Municipal Waste - Written Assessments](#)

[Proposal 23: Non-Household Municipal Waste – Small and Micro Firms](#)

[Proposal 25: Non-Household Municipal Waste - HWRCs and Commercial Bring Sites](#)