

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

Proposals/Survey Questions

Mid Ulster District Council response

How to Respond

This template replicates the questions posed in the online survey on the “Future of Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland” Public Discussion Document found at: <https://consultations.nidirect.gov.uk/daera-environment-marine-fisheries/daera-recycling-discussion-document/consultation/>

However, while the online survey includes additional information to assist respondents, the full text of the consultation can only be found on the Department’s website by following the link above or by contacting us to request a hard copy. It is recommended that you should read the full consultation document before completing your response, whether you choose to use this template or the Citizen Space Hub.

If you wish to use this template for your response, please reply by e-mail or hard copy respectively to:

recyclingdiscussion@daera-ni.gov.uk

or by mail to:

Single Use Plastics, Waste Prevention and Waste Recycling Policy Branch
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Please note that due to the Covid-19 pandemic the Klondyke Building in Belfast is currently closed to staff. Royal Mail post continues to be delivered to the building and is currently being forwarded on to relevant staff who are working remotely. Therefore post may take longer to process. For this reason, we would ask that in the first instance, you consider responding to this discussion document either directly through the online survey on the DAERA website below or via email to the email address below.

If you have any queries regarding making a response you can call 02890 569746 for assistance.

Early responses are encouraged but all responses should arrive no later than **4th October 2020 at midnight**. Before you submit your responses please read the “Freedom of Information Act 2000 - Confidentiality of Consultation Responses” section below, which gives guidance on the legal position.

Freedom of Information Act 2000 - Confidentiality of Consultations

The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can refuse to disclose information only in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

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- the Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature;
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- For further information about confidentiality of responses, please contact the Information Commissioner's Office:

Tel: (028) 9027 8757

Email: ni@ico.org.uk

Website: <https://ico.org.uk/>

Survey Proposals/Questions

About You:

Proposal 1: Improve the capture of food waste from businesses

Proposal 2: Require businesses to separate their dry recyclable waste

Proposal 3: Review the impact on rural businesses

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

Proposal 5: Improve data reporting from businesses

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

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

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

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

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

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

Proposal 12: Provide national guidance for NI on greater consistency on service for households

Proposal 13: Support national campaigns to communicate effectively on recycling

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

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

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

Proposal 17: Review metrics that focus on emissions from waste in NI.

About You:

What is your Name? **Required*

Mark McAdoo, Head of Environmental Services

What is your Email Address?

Email?

mark.mcadoo@midulstercouncil.org

What is your Organisation?

Name of Organisation (if applicable) **Required?*

Mid Ulster District Council

What type of organisation are you? Please select one of the following

- | | |
|-----------------------------|-------------------------------------|
| Business | <input type="checkbox"/> |
| Local Authority | <input checked="" type="checkbox"/> |
| Householder | <input type="checkbox"/> |
| Business Waste Collector | <input type="checkbox"/> |
| Non-Government Organisation | <input type="checkbox"/> |
| Other | <input type="checkbox"/> |

If you selected Other (please specify)

1. Improve the capture of food waste from businesses

Since April 2017, the Food Waste Regulations (Northern Ireland) 2015 require that any food business that produces over 5kg of food waste per week to segregate and secure the separate collection of food waste. Premises where food is brought from elsewhere to be consumed, such as an office where members bring their own food to consume during breaks, are not defined as food businesses. Fines for not complying with the legislation range from fixed-penalty notices of £300 to fines of £10,000 for repeated non-compliance. Since the statutory duty was introduced, in tandem with mandatory household food waste collection, there has been a 5 percentage point increase in recycling rates, mainly attributed to the regulations.

A recent survey of NHM businesses and facilities in Northern Ireland undertaken by WRAP showed that 43% of food businesses did not have separate food waste collection. Overall, for the NHM sectors only 25% had separate food waste collection. Modelling on food waste production from the NHM sectors estimates that most businesses would be producing 5kg or more of food waste per week. This indicates that many businesses in these sectors are not complying with the Food Waste Regulations. There may be a number of reasons for this lower than expected compliance of the regulations, including lack of awareness of requirements, constraints on the amount of monitoring and enforcement undertaken, difficulty in measuring the 5kg or more threshold and additional cost of the service or accessibility to service providers.

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

Q1. 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 ☒

Disagree ☐

If you selected Disagree, please explain why.

Q2. If the Food Waste Regulations (Northern Ireland) 2015 were to be reviewed which of the following areas should be investigated:

	Strongly Agree	Agree	Disagree	Strongly Disagree	Not Sure/don't know
Awareness of the Regulations to obligated businesses	X				
Requirements to separate food from all business types		X			
Options to amending the regulations for more business types to be in scope of the requirements		X			

Access to food recycling services for businesses		X			
Charging levels for food waste collection services		X			
Monitoring of business compliance	X				
Enforcement of business compliance	X				
Data and reporting of food recycling	X				

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

The current level of enforcement and who is responsible should be clarified. Also how is the tonnage of food waste currently collected from non-commercial properties such as schools (which is still classed as household waste) by private sector operators (i.e. not by local authorities) captured and measured at present?

2. Segregating Recyclable Waste

We propose to require all non-domestic businesses, public bodies and other organisations generating municipal waste to have to segregate the four recyclable waste streams glass, paper and card, metal and plastics from residual waste in order for it to be collected and recycled appropriately. Further review of the circumstances in which it may not be technically or economically practicable to collect it separately, or in which separate collection may not have significant environmental benefit will be undertaken by government. These proposals are in addition to the existing requirement for food businesses producing 5kg or more of food waste to separate it for recycling. We have proposed two potential scenarios which are outlined below.

Option 1: Separate Dry Recycling and Separate Food Waste.

This option would require all businesses and public sector organisations to segregate dry mixed recycling (except glass) and to adopt separate food waste collection. In this scenario, eligible businesses and organisations would collect 5 key dry materials – paper, card, plastic bottles, plastic pots, tubs and trays, and metal. Glass would remain in the residual stream, unless optional additional arrangements were made. Businesses would also present food waste separately for collection. We estimate this could deliver a 70% recycling rate for the non-household municipal sector.

Option 2: Separate Dry Recycling, Separate Glass and Separate Food Waste.

Under this option, all businesses and organisations will be required to separate dry material, food waste and glass for collection. This option would deliver a 74% recycling rate across the non-household municipal sector.

It might be appropriate to exempt some firms from provisions, similar to current exemptions for food waste, and these circumstances are considered below. This might be most appropriate for micro firms where the costs of compliance might be higher.

We would expect businesses to be able to at least segregate recyclable waste from residual waste in all circumstances so that it can be collected and recycled. We would be interested in views on where this may not be practicable for example for technical, environmental or economic reasons.

Proposal 2: We want to increase recycling from businesses and other organisations 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.

Q3. 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 ☒

Disagree ☐

Not sure/don't know ☐

If you selected Disagree, please explain why.

Q4. Which of the two options do you favour?

Option 1: mixed dry recycling and separate food recycling; no glass recycling ☒

Option 2: mixed dry recycling, separate food recycling and separate glass recycling ☐

Something else (please explain below) ☐

Not sure/no opinion ☐

Q5. 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 ☒

No – some exceptions are needed for particular circumstances (please provide examples below) ☐

No sure/no opinion/not applicable ☐

If you selected No, please provide examples below.

Q6. Should some businesses, public sector premises or other organisations be exempt from the requirement?

Yes ☐

No ☒

Not sure/no opinion ☐

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

Q7. 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?

Whilst there is a clear economic incentive for businesses to segregate materials Councils may not offer separate food waste or glass collections to households and should therefore not be obligated to provide these to businesses. Private sector operators can provide these extra services to businesses if necessary.

3. Rural Needs Impact

The default definition of “rural” used in Northern Ireland is those settlements with populations of less than 5,000 together in the open countryside as rural. Around 670,000 people in Northern Ireland live in a rural area representing approximately 37% of the population. Most strategies and policies developed and implemented across government have a rural dimension and it is recognised that they can have a different impact in rural areas than urban areas due to issues relating to, for example, geographical isolation and lower population densities. It is recognised that as a result of rural circumstances people in rural areas may have different needs and therefore a policy or public service that works well in urban areas may not be as effective in rural areas. The Rural Needs Act (Northern Ireland) 2016 (‘the Act’) introduced a new duty on public authorities in Northern Ireland to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services.

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.

Q8. Considering rural needs, what factors should be included in the review of the proposals on non-household municipal waste:

	Yes	No	Not sure/don't know
Cost of recycling services proposed compared to collections in urban areas	X		
Ability to reconfigure services to alleviate cost burden in rural addresses	X		
Access to recycling services in rural areas	X		
Issues with communicating to rural businesses	X		

Q9. Please list any other specific factors that should be included in the assessment of the policy proposals that may have a different impact on businesses in a rural settlements.

The cost of private sector waste collection operators providing recycling services to rural businesses may be higher e.g. due to increased transport costs. From a local government perspective the Rural Needs Act (NI) 2016 (the Act) provides a statutory duty on public authorities to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services.

4. Maximising Business Recycling Whilst Alleviating Cost Burden

Increasing recycling would be expected to save businesses money especially in situations where the majority of waste is being disposed as residual waste. However, the extent of savings and financial impact often depends on what services are already in place and the business size or amount of waste generated. Research has suggested that for small and micro sized businesses there may potentially be a cost increase in achieving the highest quality recycling systems based on the current range of services and offered in Northern Ireland. At this stage, government is keen to hear initial preferences for options that have the impact of maximising recycling of waste without financially burdening businesses.

If the proposals above are adopted, we would like to support businesses, the public sector and other organisations to make the transition successful. In particular, we would like to find ways to reduce the impact on small and micro businesses. There are a number of measures available that could be used to minimise the costs of waste collection and recycling. The options outlined below have been suggested by Northern Ireland business representatives. We will assess the feasibility and costs of a reduced list of these options over the period of this consultation and beyond.

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

Q10. 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.

Option	Likelihood of increasing recycling without a cost burden to businesses.				
	Very likely	Likely	Unlikely	Very Unlikely	Not sure/don't know
Improving access to drop off sites and HWRCs for business use.			X		
More focus on problem materials such as office furniture, tyres, batteries, printer cartridges, fluorescent lights, fats and oils.			X		
Providing business advice on optimising/rationalising current services.		X			
Sharing of containers with neighbouring businesses.			X		
Regional procurement of services to enable economies of scale and reduce charges levied on businesses.		X			
One to one support and advice for businesses.		X			
Clearer information on what materials can be recycled and how.		X			
On-line tools and calculators to provide information on reducing costs.		X			

Better data to help businesses measure performance and benchmark.		X			
Standardisation in pricing approaches from private contractors.		X			
Combining door to door household and business collections.			X		
Better access and availability of kerbside services.		X			
Rewards for businesses that recycle such as incentives, ratings and reduced costs.	X				
Government or Industry subsidised cheaper costs of collection services.	X				
Reviewing cross boundary working options (both local authority and national level).			X		
Clarity in where and how waste and recyclables are treated.			X		

Other:

There is both an economic and an environmental incentive for businesses to recycle more based on the cost differential between processing residual and recyclable waste. However improving access to Recycling Centres is unlikely to reduce costs as many sites do not accept commercial waste and those that do are required to charge for the disposal of commercial waste i.e. local authorities cannot subsidise this cost.

Q11. What are your general views on the options proposed to reduced costs?

To be welcomed however proposals should be trialled in the first instance

Q12. What might be other viable options to reduce the cost burden that we have not considered?

Collective arrangements for recyclable waste streams which have a value e.g. cardboard whereby the material could be baled and sold in bulk for an income.

Q13. Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

Better/combined use of NetRegs, BITC etc. in the form of a “one stop shop”

5. Business Waste Data

Having good data on business waste is essential to be able to understand the impacts of waste flows of the environment and to design support for a wide range of organisations in scope of the proposals. Currently business are not legally obligated to report their waste tonnages in the same way as Councils report on household waste. There is a gap in comprehensive data on the flow of waste from businesses and other organisations, limited information on container provision and on the service profiles adopted. If we want to achieve higher recycling rates for municipal waste we will need to improve the quality of data and information available on the current baseline of services in order to determine the scale and cost of making improvements.

Government does already require waste facilities to report flows and types of waste and recycling managed at their sites. However, the nature of collecting mixed loads of waste in rounds means that it is not straightforward to estimate amounts originating from specific businesses or individual sectors. Government has commissioned surveys, but they are often expensive and not wholly reliable or representative of the diverse sectors generating waste and so have not been repeated recently. As a result, our estimates of business and public sector waste rely on incomplete, fragmented data and a number of assumptions, which impacts on its robustness. This issue must be addressed if we are to assess our progress towards a 65% recycling rate target for municipal waste and develop support mechanisms which alleviate the costs on businesses.

We want to work with waste producers and waste collectors in this sector to develop more reliable reporting systems for waste and will look at whether we can implement harmonised waste reporting systems that can be used by Councils, businesses and public sector organisations. For example, we are currently undertaking proof of concept work on waste tracking which, if successful, will help us to obtain more transparent, timely, robust and cost-effective waste management data.

We are not consulting on specific proposals for reporting here but will develop proposals with the sector and develop a future consultation on detailed measures to implement consistency.

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 organisations. Any requirements will be subject to further consultation.

Q14. Should businesses and other organisations be required to report data on their waste recycling performance?

Agree ☒

Disagree ☐

Not sure/no opinion/not applicable ☐

If you selected Disagree, please explain why.

Q15. Who should bear the responsibility for reporting data on waste from businesses and other organisations (please 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) ☒

Not sure/no opinion/not applicable ☐

Q16. What specific data sets would your organisation find useful if businesses were required to report under Proposal 5?

A data set similar to and complementary with WasteDataFlow would be useful

6. Restricting Residual Waste

As food waste and dry recycling collections increase, we expect the amount of residual waste collected to reduce. Since 2006, residual waste has fallen by 56%, from approximately 205,000 tonnes to 115,000 tonnes. These reductions in the level of residual waste have led Councils to review the frequency of residual collections and reduce them to fortnightly whilst refocussing efforts in improving recycling services.

Trends show that in recent years local authorities across the UK have considerably increased restrictions to the available capacity of residual waste for households. These residual waste restrictions have been achieved typically through lower frequency collections or by reducing the volume of residual containers for households. Research shows higher levels of recycling performance are associated with restricted capacity for residual waste. It is understood that Councils have made the restrictions in residual waste in order to deliver financial savings to the local council, to increase recycling performance and the capture of key materials, to help with the introduction of new recycling services or a combination of these reasons. Consumer feedback shows that satisfaction in waste and recycling services is dependent on the comprehensive profile of services offered and that despite reductions in residual capacity public support can remain very high.

Most Councils restricting residual waste capacity have tended to reduce frequency of the service since this offers greater financial savings than replacing the container and maintaining the frequency. In restricting the capacity of the residual stream Councils have sometimes made enhancements to the recycling collections at the same time. 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.

The restrictions to residual waste tend to be placed on kerbside door to door collections rather than to flats or high density housing. Exemptions for high density or other difficult to service properties would need to be considered in any policy on restrictions of residual capacity.

The survey questions are looking at interest in the principles of residual restriction rather than the precise service specification at this stage. Further dialogue on the detail of the type of residual restriction, the accompanying recycling service profiles and the expected service standards for delivery will be included in a further consultation which would take place in 2021.

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.

Q17. 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 – Councils should be required to restrict residual waste capacity ☐

Agree – Councils 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. ☒

Disagree – Councils should not be required to further reduce residual waste capacity by any means ☐

Not sure/don't have an opinion ☐

Q18. 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 bin volume while retaining existing collection frequency ☒

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

Agree – Councils should be required to restrict residual waste bin volume and reduce frequency ☐

Not sure/don't have an opinion ☐

Q19. 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?

Potential Enhancement	Yes	No
Increased frequency of the dry recyclables collection		X
Increased frequency of the food recycling collection		X
Larger container capacity for the dry recyclables collection	X	
A higher frequency sanitary waste collection		X
A collection of nappies for young families		X
Not sure/don't have an opinion		

Other (please specify below)

Restrictions on residual waste agreeable only if necessary to meet targets and providing that any such changes are not implemented in isolation i.e. needs to be an increase in the capability and capacity of households to recycle more materials directly. For example a second recycling container could be provided instead of a larger container. However this also would require extensive capital

funding as would the purchase of smaller residual waste containers. A capital funding application by Mid Ulster District Council to the DAERA Collaborative Change Programme to conduct a trial based on the very proposals above was turned down in 2019.

It is very important to recognise that reducing the frequency of residual waste collection may not have universal political support and this option has generally been driven by budgets in other jurisdictions.

7. Food Waste from Households

Approximately 285,000 tonnes of household food waste (that is incorrectly placed in residual waste bins) is sent to landfill in Northern Ireland each year. Here it can release methane, a harmful greenhouse gas, into the atmosphere unless captured for energy generation. If collected separately from residual waste materials, food waste can be sent for in-vessel composting (IVC) or anaerobic digestion (AD), where it breaks down in a controlled way and the methane from AD is converted into gas that can be fed into the national gas grid, used to generate electricity, or used as a vehicle fuel. The AD process also produces a nutrient-rich fertiliser (called digestate) that farmers can use in place of chemical fertilisers.

Currently, all Councils in Northern Ireland offer a collection of food waste separately from residual waste. Out of this, 19% of households receive separate food waste collection on a weekly basis and 81% of households receive collection of food waste mixed with garden waste, usually on a fortnightly basis. UK research shows that collecting food waste mixed with garden waste fortnightly can lead to lower yields compared to a weekly separate food waste collection. On the other hand, mixed food and garden waste collections can be easier to implement as it does not require separate arrangements for collection of food and garden waste. UK Local Authorities do provide weekly mixed garden and food collections but to keep costs low collections tend to be lower frequency.

In order to maximise capture of food waste we propose to require that from 2023, all Councils offer all households a weekly food waste collection. This would be expected in all circumstances except where it was not technically, environmentally or economically practicable to collect this waste separately from other bio-waste. Although there may be some circumstances where a mixed food and garden waste collection is necessary, these should be limited. This might include for lower transport costs arising from using local IVC facilities.

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.

The following question is designed to consider preferences for the proposal and consultees are encouraged to select more than one option where they may be interested in multiple aspects of the proposal.

Q20. Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste		X	
(ii) a separate collection of food waste (i.e. not mixed with garden waste)		X	
(iii) a weekly mixed food and garden waste collection		X	

(iv) services to be changed only as and when contracts allow	X		
(v) providing free caddy liners to householders for food waste collections			X (not sure)

For any element of the above question where you answered “disagree” please provide explanation of your views in the box below. For any views on the above or preferences to retain the current fortnightly food waste collection service profile please provide evidence to support your statement.

Mid Ulster District Council achieved a household recycling rate of 59.17% in 2019/20 (the highest in N Ireland) with 33.52% being attributable to composting of garden and food waste, the majority of which was collected commingled at the kerbside on a fortnightly basis. It has therefore been proven that fortnightly comingled systems can deliver recycling rates in the region of 60% WRAP has acknowledged that the commingled biowaste schemes in N Ireland are amongst the best performing in the UK. Indeed the results of the NI Waste Compositional Study carried out in 2017 (table 18) showed that during the first (summer) phase more food waste (1.07kg/hh/week) was collected from commingled schemes compared to separate collections (0.92kg/hh/week). When an average of the first (summer) and second (winter) phases are taken the difference is marginal with an average of 1.2 kg/hh/week from commingled schemes compared to 1.28 kg/hh/week from separate food waste collections.

It would therefore be difficult to justify the massive capital expenditure and operational/revenue costs involved in changing to separate/weekly collections of food waste. Also consideration has to be given as to what would happen to the garden waste currently collected at the kerbside (currently accounting for 75-80% of the biowaste material in commingled schemes) should separate/weekly collections be imposed. The continued separate kerbside collections of garden waste would no longer be feasible and what impact would this (unintended consequence) have on overall recycling rates in N Ireland?

With regard to the provision of caddy liners, Mid Ulster District Council is the only local authority in N Ireland which does not provide these free of charge to households (instead they are sold at a cost of £1 per roll). This does not appear to have adversely affected the performance of the kerbside biowaste collection scheme. However if funding were to be provided or budget made available to provide liners free of charge it is possible that the capture of food waste could be sustained at a level beyond that of separate collections.

We recognise that some Councils with larger, denser populated, urban areas may consider weekly collections worthwhile.

We remain unconvinced that a weekly kerbside collection of food waste on its own will significantly increase the overall amount of food waste being collected, particular in more rural areas by comparison to other systems including comingled fortnightly collection of green/garden waste (brown bin).

As a consequence we believe that the introduction of a separate weekly kerbside collection of food waste could be cost prohibitive for Councils and that any savings on the processing of comingled food and garden waste would not be significant.

We feel that this is an example of DAERA legislating for the 'how' as opposed to the 'what'; The Department should restrict itself to setting Policy which includes Targets; it is a matter for Councils (individually or collectively) to decide how they are going to achieve the policy objectives and the associated targets.

Finally 2023 would not be a realistic timescale if Councils are forced down this route given the implications for collection methodologies in terms of the types of collection vehicles used and the duration of existing biowaste contracts.

8. Core Materials

We think the time is right to put in place changes that will ensure the same range of materials is collected for recycling from kerbside for every household in Northern Ireland to help avoid any confusion for households. We therefore propose to legislate for all Councils in Northern Ireland to be required to collect a minimum or core set of 'dry' recyclable materials from kerbside households and flats. This will ensure that every householder is able to recycle a consistent set of materials. We think it is unlikely that Councils will need to deviate from collecting these materials but would welcome views on circumstances where this might be necessary.

This core set of dry materials should include at least the following:

- glass bottles and containers – including drinks bottles, condiment bottles, jars etc.;
- paper and card – including newspaper, cardboard packaging, writing paper etc.;
- plastic bottles – including drinks containers, detergent, shampoo and cleaning products etc.;
- plastic pots tubs and trays; and;
- steel and aluminium tins and cans.

The core set of materials above would have to be collected by all Councils in Northern Ireland, meaning every householder could expect to recycle the same set of materials regardless of where they live in Northern Ireland. We acknowledge that all Councils in Northern Ireland already collect these dry recyclable materials for at least some of their households. The method of collection may be subject to local circumstances and this is covered elsewhere in this consultation. This means that in following these reforms every householder could expect to recycle the same materials regardless of where they live, but the way in which these materials are collected, (e.g. the bins or other containers used) may vary locally.

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.

Q21. 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 | <input checked="checked" type="checkbox"/> |
| Disagree – Councils should not be required, to collect a core set of materials | <input type="checkbox"/> |
| Not sure/don't have an opinion | <input type="checkbox"/> |

Q22. We think it should be possible for all Councils to collect the core set of materials. Do you agree with this?

Agree ☒

Disagree ☐

Not sure/don't know ☐

If you select Disagree, please provide further information and evidence as to what circumstances it is not practicable to collect the full set of materials

Q23. What special considerations or challenges might Councils face in implementing this requirement for existing flats and Houses in Multiple Occupancy (HMOs)?

Consideration will have to be given as to how likely higher levels of contamination from such properties would be monitored and controlled.

Q24. 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.

Some clarity would be required on the sanctions to be imposed on Councils for failing to collect the core materials and some flexibility may be required whereby this is not possible temporarily due to operational or contractual issues

9. Definition of Core Materials

Consolidating the range of materials collected will help build a platform for additional materials to be added to a core list and provide greater clarity for funding going forwards. The waste streams generated by households contain some items or materials that could be considered 'difficult to recycle' using conventional sorting and reprocessing infrastructure in Northern Ireland and across the UK. These items include a wide range of products including plastic films, non-bottle glass, sanitary products and composite packaging. Over time, the composition of waste from households is expected to change under the influence of Extended Producer Responsibility (EPR) on packaging design and industry initiatives and this may consequently have an impact on collection systems.

As a consequence, the core set of materials specified by government may need to adapt to these changing circumstances, as products are re-designed and manufacturing processes develop to reprocess these materials. Therefore, we will maintain flexibility within the law to update the core set of materials to be collected, if required, in the future.

New materials would be added to the core set, subject to further consultation and evidence being provided that they are collected or can reasonably be collected for recycling and can reasonably be recycled. The range of materials would also be determined by packaging EPR and Deposit Return Scheme (DRS) proposals (as outlined above). It is expected that the additions to the core set would be considered with the UK countries to ensure greater clarity for consumers and also to help develop UK reprocessing facilities.

Other materials that could be included either immediately or over time might be:

- plastic bags and other plastic film and;
- black plastic food and drink packaging.

Some Councils have expressed concern over the economic viability of collecting all recyclable materials because of a lack of market demand or low prices offered by re-processors for materials. This is a valid concern, but it is expected that the materials added to the list will be in scope of reforms to producer responsibility which will ensure full net cost recovery overall for packaging materials and so costs of collection would be covered. The greater consistency in collections will help to support more sustainable secondary materials markets and better-quality recycling.

We would welcome views on whether the proposed core set of dry materials identified above is sufficient and whether it could include other materials which might be regarded as more difficult-to-recycle. We also welcome views on circumstances where such a comprehensive service for dry recycling may not be practicable from a logistical perspective and challenges for the householder.

We are also aware of a growing trend of businesses and public bodies switching from using plastics to certified compostable plastic packaging and tableware. Compostable plastics are also being used to manufacture packaging of short-life products and container lids.

Where compostable plastics are collected in dry recycling collections they may contaminate the dry recycling process and compromise quality. Clear labelling and communications would be necessary to help manage these risks. Appropriate treatment

infrastructure would also need to be in place before we considered adding compostable plastics to the core list of materials to be collected for recycling.

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.

Q25. Do you believe that all of these core materials should be included or any excluded?

	This should be included in the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	X		
Paper and card	X		
Plastic bottles	X		
Plastic pots tubs and trays	X		
Steel and aluminium tins and cans	X		

Q26. What other products or materials do you believe should be included in the core set that all Councils will be required to collect?

	This should be included in the core set from the start	This should be included from the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Plastic bags and film		X		
Black plastic food and drink packaging		X		
Other materials (please specify) Tetra packs				

Q27. 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?

Financial support from extended producer responsibility schemes is required.

Q28. Do you have any other comments to make about Proposal 9?

Will the same core set of materials extend to non-household properties as well?

10. Reviewing Core Materials

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.

Q29. Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

- | | |
|--------------------------------|-------------------------------------|
| Agree | <input checked="" type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Not sure/don't have an opinion | <input type="checkbox"/> |

Q30. Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

- | | |
|---------------------------------|-------------------------------------|
| Yes – but I would also add some | <input checked="" type="checkbox"/> |
| No – some/all should be removed | <input type="checkbox"/> |
| Not sure/don't have an opinion | <input type="checkbox"/> |

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

As assessment could made on the possible inclusion of lower grade materials not solely on their potential to be recycled but also on their potential to be sent for (energy) recovery i.e. based on the waste hierarchy which would still be environmentally and economically preferable to disposal of same to landfill.

If you selected No – some/all should be removed, please specify which below

Q31. Do you have any other comments to make about Proposal 10?

Any government review of the core materials set should include local government as the Department should not be dictating the range of materials.

11. Separate Collection

In addition to the new core set of materials that we will require to be collected, we want to promote separate collection of materials where this is feasible and can help to improve quality of valuable resources collected for reprocessing. Research shows that greater separation of materials does increase the likelihood of these resources being utilised in closed loop recycling processes which significantly increases the overall environmental benefits gained (see Encirc case study in the main discussion document)

It is also likely that producers paying into Extended Producer Responsibility (EPR) with their own incentives of packaging targets will want to ensure that resources they are accountable for are recycled into optimum end-markets in the UK.

Regulations 18 and 20 of the Waste Regulations (Northern Ireland) 2011 transposed the Waste Framework Directive requirements for ensuring separate collections of paper and cardboard, plastic, metal and glass. The Regulations encourage separate collections of dry recyclables but allow for deviations in approach and service delivery and mixing of materials on the basis that locally it may technically, economically and environmentally practicable (TEEP) to do so. Current UK Guidance from the Regulator and key stakeholders provides advice on the application of the regulations.

Typically, separate collection should take place except where:

- collecting certain types of material together does not affect their potential to undergo re-use, recycling or recovery operations and results in output from those operations which is of comparable quality to that from separate collection;
- separate collection does not deliver the best environmental outcome;
- separate collection is not technically feasible taking into account good practice in waste collection;
- separate collection would entail disproportionate cost, taking into account costs of adverse environmental and health impacts of mixed waste collection and treatment, as well as potential for efficiencies from separate collection and revenues from secondary material sales and polluter pays principles.

Since the available UK guidance is now a few years old and with recent and potential forthcoming changes it is important to clarify the requirements of separate collection in law to make these clearer for Councils and waste operators to follow.

Collecting a broader range of materials may alter the approach under which collection systems could be considered more or less efficient. The revisions to the Waste Framework Directive under the Circular Economy Package (CEP) and the proposals for a core set of materials with potential expansions means that it is now time to review the supporting guidance.

Subject to views from this consultation we will prepare guidance setting out further advice on separate collection and seek to clarify the law as necessary.

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.

Q32. 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 ☒

No ☐

Not sure/no opinion/not applicable ☐

If you selected No, please provide examples below

Generally agree a review is required subject to the following:

- NI evidence base is used and not an extrapolation from other jurisdictions
- that a 'whole life' economic appraisal is included as part of the review i.e. that collection and processing costs and benefits are included including non-monetary benefits
- the review is carried out in conjunction with the 11 Councils
- the outcome of the review is best practice 'guidance'.

An assessment conducted previously concluded that a source segregated collection system is not Technically, Economically or Environmentally Practicable (TEEP) for Mid Ulster District Council nor necessary to facilitate or improve recovery based on the quantity of material collected and therefore recommended that the current fully commingled collection system be retained.

Q33. What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide supporting evidence for your statements. Supporting evidence for your statements can be emailed to: recyclingdiscussion@daera-ni.gov.uk

Mid Ulster District Council achieved a household recycling rate of 59.17% in 2019/20 (the highest rate in N Ireland) with 25.65% being attributable to the recycling of dry recyclables, the majority of which was collected co-mingled at the kerbside on a fortnightly basis. It has therefore been proven that fortnightly commingled systems can deliver recycling rates in the region of 60% locally.

The separate collection of paper, card, glass, metals and plastics would require a change from a commingled to a kerbside sort system which is just not practicable, in any sense, in a mainly rural district like Mid Ulster. Indeed the Council is currently transitioning from standard refuse collection vehicles to the use of One Armed Vehicles (OAVs) i.e. single person operated vehicles in all rural parts of the district for operational efficiency and health and safety reasons. These specialist vehicles cost approx. £230k each (with 5 currently in operation, 2 recently delivered and a further 4 ordered for 2021/22) and have an anticipated operational lifespan of at least seven years. Any deviation from

this fleet replacement strategy would have huge implications on capital expenditure in addition to the massive costs involved in replacing all recycling containers.

The results of a Northern Ireland wide recycling poll conducted in 2019 showed that in Council areas, such as Mid Ulster, where household recyclables such as paper, card, metals, plastics can be collected commingled with glass in the same bin, 80% were happy with their recycling scheme compared to 42% of those in Council areas that did not offer this service i.e. kerbside sort is not as popular.

12. National Guidance

We want to increase the quantity of materials collected for recycling, but we do not wish to do so at the expense of quality. We want to help Councils improve the quality of what is collected for recycling so that its value can also increase. We also want Councils to make the best decision for local circumstances. However, we recognise that since Extended Producer Responsibility (EPR) is likely to be adopted across the UK there is a need to encourage some convergence in scheme profiles to benefit producers who would be expected to financially support service delivery going forwards.

National guidance would help waste collectors to meet their duties in relation to separate collection and promote high quality recycling. Guidance could also set out the process by which Councils should use the conditions above to support decisions on local collection arrangements and what information should be recorded in relation to any assessment of separate collection.

Over the past decade each of the nations has made steps to promote commonality in collection systems within their own country. Whilst there have been common aims the extent to which each country requires adherence to the specific service profile or retain flexibility does vary. The main discussion document outlines the key approaches the nations have taken.

The detail of service specifications will be considered in a follow up consultation. At this stage we are seeking views on the type of guidance that should be put in place in order to encourage the level of change desired. This national guidance could come in one of three forms of detail and specification from Government:

1. **Statutory Recycling Service Guidance:** This option would develop statutory guidance for specifically how recycling services must be provided to residents, that all Councils are required to follow.
2. **Statutory Guidance Setting Minimum Standards for Recycling Services:** This option would provide Statutory Guidance on a minimum level of service beyond which Councils will be able to design and deliver services locally for their area.
3. **Non-Statutory Guidance for Recycling Services:** This option would provide good practice Guidance on service standards and local flexibility in service design but with no requirement to meet these standards.

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.

Q34. What would be your preferred approach to Government encouraging greater national consistency in collection services?

Proposal	Agree	Disagree	Not sure/don't have an opinion/not applicable
Publish Statutory recycling service guidance to detail service requirements?		X	
Publish Statutory minimum service standards guidance?		X	
Publish non-statutory guidance?	X		

Q35. Do you have any further comments to make about the Proposal outlined above?

Any guidance must be produced in conjunction with the 11 Councils as they have the statutory responsibility for the collection of waste and are best placed to make the final decision on schemes to suit local circumstances. Again, this should be about the 'What' of waste management policy and not the 'How' of how Councils approach the operational issues. Given the demographic, spatial and socio-economic make up of NI recognition must be given to the avoidance of the 'one size fits all approach'

13. Communication on Recycling to Residents

Despite improvements in recycling performance there is a considerable amount of recyclable material and organic material which is disposed of in residual waste receptacles. According to WRAP's 2018/19 Recycling Tracker Survey, 64% of households in Northern Ireland disposed materials into the residual bins that could have been recycled.

While changing people's behaviour can be challenging, many householders want to recycle. For example, in WRAP's 2018/19 Recycling Tracker Survey, 55% of householders in Northern Ireland said 'I want to be a really good recycler and I take the trouble to ensure that I'm doing everything right'. Therefore, we should make it easier for them to participate by providing clear information. Effective and sustained communications with householders will be critical for ensuring that we achieve our main objectives of increased recycling quantity and quality, and will help to:

- minimise public confusion over what can and cannot be recycled and help increase participation in recycling schemes and minimise contamination;
- give the public suitable information on how and where their waste is recycled. Lack of transparency and understanding over whether their waste is actually recycled can often dent public confidence in recycling schemes;
- help deter public misuse of collection bins and other poor behaviours, e.g. fly-tipping, vandalism;
- build a culture of sustainable waste management underpinned by appropriate waste separation for recycling among householders and businesses; and;
- clarify the responsibilities that Councils would have for undertaking separate waste collections from households.

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.

Q36. Do you have any comments to make about Proposal 13?

This should be extended to include communication on waste reduction and minimisation as these feature higher up the waste hierarchy. It should be noted WRAP national campaigns usually need tailored to suit local circumstances.

Q37. What information do householders and members of the public need to help them recycle better?

Reinforcement of the monetary benefits in addition to environmental e.g. that it costs more than double to landfill a tonne of biowaste instead of composting.

14. Transparency of Information for Householder

Householders are not always clear on the benefits of recycling and what happens to materials following collection. For example, some people believe that materials are landfilled or incinerated rather than properly recycled or are sent overseas to be landfilled rather than recycled.

We want to ensure that householders have a clearer understanding of where the waste they sort for recycling goes to and what the final outcome is, and that they are confident that what they do is helping to reduce waste and preserve environmental health. Changes within the data system Councils use to record waste information (WasteDataFlow 44) have provided the facility to improve the transparency of details on waste treatment for different materials, and wider publicity of end destination might help to support public confidence in recycling. Current reporting on contamination from Materials Recovery Facilities (MRFs) in Northern Ireland is inconsistent. One of the difficulties comes from the need to report contamination by Councils, which can be problematic as material can be sent to multiple MRFs. The information on contamination is recorded by MRFs, but there is no requirement to report these figures. Accurate reporting on contamination can have a big influence on assessing the benefits of different recycling schemes and in the future could influence funding delegation from Extended Producer Responsibility (EPR).

Government is currently undertaking proof of concept work through the GovTech Challenge to test the feasibility of developing a means of more effectively tracking waste from production, through treatment and final destination, including waste exports. This has potential to provide a more transparent stream of information to the public and industry about recycling and materials flows. If successfully implemented, this may help to increase public and stakeholder confidence in the benefits of recycling.

Consistent collections will make it more efficient and cost-effective to communicate with the public, irrespective of where they live and work in the country. They will also help to improve the labelling of materials for recycling purposes.

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

Q38. Do you agree or disagree with this proposal?

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

Disagree – government should not work with Councils and other stakeholders on this ☐

Not sure/no opinion/not applicable ☐

Q39. Do you have any other comments to make about Proposal 14?

Councils currently receive data on contamination from MRFs which they report via Waste Data Flow. This proposal should also extend to the reporting of the end destinations of non-household waste (through whatever system is adopted). This could require a review of the 'Duty of Care' regulations for processors.

15. MRF reporting requirements

Codes of Practice with statutory reporting requirements on the weight of target, non-target & non-recyclable materials currently exist in Materials Recovery Facilities (MRFs) in England, Wales and Scotland, but not Northern Ireland. Such reporting is also in line with circular economy reporting requirements for municipal waste. Introducing these codes of practice to Northern Ireland can assist in assessing performance and identifying opportunities for individual MRF and increase transparency for residents as to the destination of their recycling that is collected.

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

Q40. Do you agree or disagree with this proposal?

- | | |
|--|-------------------------------------|
| Agree – government should introduce regulation on MRF reporting | <input checked="" type="checkbox"/> |
| Disagree – government should not introduce regulation on MRF reporting | <input type="checkbox"/> |
| Not sure/no opinion/not applicable | <input type="checkbox"/> |

Q41. Do you have any comments or ideas for improving reporting on MRF contamination rates?

The distinction between non-target and non-recyclable material will have to be clearly defined so as to avoid confusion as to what is classed as contamination. It should be noted that the MRF Code of Practice operating in the other parts of the UK has led to higher operator fees/penalties for many local authorities.

16. Performance Indicators

We want to ensure that the measures we have discussed in this consultation including having a minimum set of materials to collect, weekly food waste collection and garden waste collection, help us to move significantly towards meeting higher targets for recycling. We also want Councils to continually improve so that they become more efficient and can achieve higher levels of recycling. If Councils implemented the changes in this consultation, they would increase recycling significantly. The quality of the day-to-day service delivery, and the extent and quality of communication with householders are also key to increasing participation, yield and better quality of recyclables.

DAERA currently promotes 15 performance indicators related to waste and recycling services.

There are 12 Key Performance Indicators (KPIs) derived from WasteDataFlow¹;

1. Kpi (a) Percentage of household waste arisings sent for recycling and composting
2. Kpi (a2) Percentage of household waste arisings sent for preparing for reuse & recycling (inc. composting)
3. Kpi (b) Percentage of household waste arisings landfilled
4. Kpi (e) Percentage of Local Authority Collected Municipal Waste arisings sent for recycling and composting
5. Kpi (e2) Percentage of Local Authority Collected Municipal Waste arisings sent for preparing for reuse & recycling (inc. composting)
6. Kpi (f) Percentage of Local Authority Collected Municipal Waste arisings landfilled
7. Kpi (g) Biodegradable Local Authority Collected Municipal Waste landfilled
8. Kpi (h) Total household waste collected per household
9. Kpi (j) Total Local Authority Collected Municipal Waste arisings
10. Kpi (m) Percentage capture rate for collected household kerbside primary waste categories
11. Kpi (n) Percentage growth rate in Local Authority Collected Municipal Waste arisings
12. Kpi (p) Total household waste collected per capita

There are three Waste Management Indicators that were set out in legislation under the Local Government (Performance Indicators and Standards) Order (Northern Ireland) 2015;

- W 1 The percentage of household waste (1) collected by Councils that is sent for recycling (including waste prepared for re-use).
- W 2 The amount (tonnage) of biodegradable Local Authority Collected Municipal Waste that is landfilled.
- W 3 The amount (tonnage) of Local Authority Collected Municipal Waste arisings.

Given the changes in waste management and recycling practices likely to occur in the near future DAERA is seeking views on the benefits of the current indicators or how new indicators might be delivered. We want to know if such an approach would help to support continuous improvement in recycling. This would help Councils to benchmark their performance and to identify areas for service improvement to increase recycling yield, to

¹<https://www.wastedataflow.org/documents/guidancenotes/NorthernIreland/KeyPerformanceIndicators/Kpisummarysheetv3.pdf>

reduce residual waste and to make services more cost efficient. A suite of performance indicators would allow Councils to assess services more effectively than just using the overall recycling rate.

It is important that a range of local contextual influencing factors such as deprivation and housing stock should be taken into account when considering Councils' recycling performance. We would also want to work with local authority bodies and waste operators to develop these performance indicators so that they are useful locally and fit for purpose.

Waste and recycling indicators could be calculated on a yield basis and aligned to household numbers in a local authority collection area to enable the effect of housing growth to be taken into account. Subject to consultee views, non-binding performance indicators could be developed for at least the following areas:

- dry recyclables (total)
- food waste
- garden waste
- residual waste
- service efficiency
- cost
- satisfaction with services

The indicators would be reviewed on a regular basis to ensure they remain relevant and are of assistance to Councils in monitoring and waste management and recycling. Any new data set developed with Councils will be included in the governments Single Data Set which lists all the datasets that local government must submit to central government.

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.

Q42. Do you agree or disagree that a new set of recycling and waste indicators is required?

Agree ☒

Disagree ☐

Not sure/no opinion/not applicable ☐

Q43. Do you consider that any of the current set of 15 indicators should be removed?

Agree ☒

Disagree ☐

Not sure/no opinion/not applicable ☐

Q44. If you selected Agree in Q43, which indicators do you think should be removed?

In the absence of a replacement to the Northern Ireland Landfill Allowance Scheme KPI (g) and W2 could be removed as these relate directly to the NILAS targets. Also KPI (j) and W3 are not particularly helpful as they fail to take account of population and/or household occupancy levels.

As a general point many of the existing KPIs will have to be changed to reflect the new definitions/obligations of (non-household) municipal waste.

Q45. Are there any specific recycling and waste indicators for household waste which you think should be included?

The KPIs as listed do not include the new 'waste from households' (WfH) recycling rate which has been introduced for statistical purposes to provide a harmonised UK indicator (this uses a different definition to household waste).

A new KPI based on residual household waste per head in each local authority (as published annually by Resource) should be included as this would represent a good measure of progress towards zero waste and the circular economy goals.

Any additional KPIs developed should relate where possible to the new targets.

Q46. Do you have any general comments to make about performance Indicators?

Any proposed performance indicators in relation to local authority service efficiency, costs or customer satisfaction need to be discussed and agreed in advance with Councils as these have proved problematic (to a point of being almost worthless) in the past due to variations in service delivery models within urban and rural Council areas and differences in how Councils account for some of their costs. Only a limited number of Councils participate in the existing ASPE performance networks/benchmarking process and the difficulty in achieving a valid set of performance indicators should not be underestimated

17. Developing Additional Recycling Metrics

Weight (in kilogrammes or tonnes) is currently the common method for the measurement of waste arisings and recycling performance. However, there are other indicators that signal the important economic and social aspects of resource management which may best be reflected using financial and economic measures, such as economic value or jobs created, or social measures, such as well-being.

If Northern Ireland is to become a world leader in resource efficiency, as set out in the Environmental Strategy for Northern Ireland public discussion document (Sept 2019), it will be important that we develop and implement indicators and ways of understanding actual performance – nationally and locally. These should be better suited to reflecting the environmental costs and benefits of managing various waste materials sustainably (environmentally, economically and socially). Discussions with Council representatives have suggested that new ways of measuring waste management performance would be beneficial but should not replace weight-based metrics. Rather, they should be used alongside existing weight-based metrics.

We are not proposing new metrics as part of this consultation but are interested in your views on whether we should supplement weight as the primary means of measuring recycling performance. For example, carbon intensity is one metric that has been used widely as an alternative for measuring recycling performance.

We would like to hear your views on alternative ways of monitoring and reporting the impacts of waste.

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.

Q47. Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

Agree ☒

Disagree ☐

Not sure/no opinion/not applicable ☐

If you selected Disagree, please explain why.

Q48. Do you agree that these alternatives should sit alongside current weight-based metrics?

Agree ☒

Disagree ☐

Not sure/no opinion/not applicable ☐

If you selected Disagree, please explain why.

Q49. What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

We agree that a carbon intensity based metric that supplies a figure for the 'whole-life carbon impacts' of waste would be useful to sit alongside (but not replace) weight-based metrics. Consideration should be given to adopting the Recycling Carbon Index as reported annually by Eunomia Ltd which takes local authorities' recycling performance data from WasteDataFlow and multiplies same by the carbon 'factors' used by Zero Waste Scotland to produce the Carbon Metric. This process converts tonnage data for each recyclable material into carbon dioxide equivalents (CO₂ eq.) and shows the total embodied carbon in the material that authorities are diverting from disposal to recycling. Local authorities that collect more of the materials with a higher embodied carbon for recycling will show greater benefits. It also takes account of the emissions impact of source separated and comingled collections.