



# Rethinking Our Resources:

Measures for Climate Action  
and a Circular Economy in NI

Abridged version

March 2024



Department of  
**Agriculture, Environment  
and Rural Affairs**

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)

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working, active landscape  
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<https://www.daera-ni.gov.uk/consultations/rethinking-our-resources-measures-climate-action-and-circular-economy-ni-consultation>

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## Ministerial Foreword

Our landmark Climate Change (NI) Act 2022 has set the direction and ambition for environmental protection and tackling the ever-increasing impacts of the climate crisis we now face. We are committed to achieving Net Zero by 2050. It is now imperative that all the people of Northern Ireland come together and actively contribute to reaching this crucial goal.



Our current linear economy, where we **take, make, use and waste**, means that [92.1% or 33.6 million tonnes](#) of material is not cycled back into the economy in NI. While some of these materials are used for buildings and infrastructure which last for a long time, unfortunately, most of these precious resources end up as waste rather than being reused, refurbished, re-manufactured or recycled.

### **We need to change this.**

Reducing the amount of waste we generate, the amount we send to landfill together with managing our resources more sustainably by increasing the quality and quantity of our recycling will allow a move to more closed-loop, local recycling systems. This move will not only have benefits in the reduction of greenhouse gases from the waste sector but will also provide significant economic benefits to NI, helping drive a transition to a low carbon, Circular Economy and aligning with the NI Executive's over-arching draft Green Growth Strategy.

**My vision for Northern Ireland is a strong, green economy which values its resources and actively closes the loop by putting as many of those resources back into the system as possible.**

We have made great strides in dealing with our waste and reducing our reliance on landfill in Northern Ireland over the past two decades. We have achieved 50% household recycling by 2020 and reduced the quantity of municipal waste to landfill by three quarters since 2007.

### **We now need to go further.**

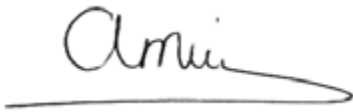
I fully recognise the importance of recycling as part of tackling our waste problem, which is why I proposed the amendment to the Climate Change Act, laying down a requirement for at least 70% of waste to be recycled by 2030. This consultation is an important step in delivering on that ambition.

This means not only making improvements to the way we recycle at home, but also looking at how we manage our resources at work, at school or in other settings. Recycling is the right thing

to do and shouldn't be difficult. With that in mind, I am proposing, through this consultation, to introduce recycling to those organisations and businesses that produce waste which is similar in nature to that produced by households and propose to implement collection systems which mirror those in households to make dealing with our recycling easy and consistent no matter where we are in NI or what we are doing.

This consultation seeks responses to twenty-six proposals focused on household recycling and 'non-household municipal' recycling or business recycling. Parts of this document are complex and technical; it is therefore not necessary for every respondent to answer every question. Please only answer the questions you feel are relevant to you, your business, or your organisation.

Responses to this consultation will be used, along with expert advice and evidence, to develop new policy and legislation with the goal of improving resource and waste management in Northern Ireland, aiding the transition to a low carbon, Circular Economy and tackling climate change.

A handwritten signature in black ink, appearing to read 'A. Muir', with a long horizontal flourish extending to the right.

**Andrew Muir MLA**

Minister of Agriculture, Environment and Rural Affairs.

## Executive Summary

The Climate Change Act incorporates several actions for the decarbonisation of the waste sector and in particular sets out a clear requirement of achieving at least **70% of waste recycled by 2030**. In addition to this requirement, amendments made in 2020 to the Waste and Contaminated Land (NI) Order 1997 (WCLO) introduced new municipal recycling targets - for households and businesses who produce waste like households. The WCLO requires NI to **achieve a 65% recycling rate for municipal waste by 2035 and a 10% cap on the amount of waste going to landfill** by the same year.

Reducing the amount of waste we send to landfill and managing our resources more sustainably, by increasing the quality and quantity of our recycling will allow a move to more closed-loop, local recycling systems. This move will not only have benefits in the reduction of greenhouse gases from the waste sector but will also provide significant economic benefits to NI, helping drive a transition to a low carbon, Circular Economy and aligning with the NI Executive's overarching Green Growth Strategy.

In June 2020, a discussion document 'Future Recycling & Separate Collection of Waste of a Household Nature in Northern Ireland' was consulted on to inform options for the way forward. A summary of responses was published in 2021 and an overview of short-, medium- and long-term options to improve recycling was published in September 2022. In the interim period, between the publication of the Discussion Document and the launch of this consultation, ongoing and fruitful engagement with stakeholders provided useful feedback used to help inform the development of the proposals in this document.

We have made great strides in dealing with our waste and reducing our reliance on landfill in Northern Ireland over the past two decades. We have achieved 50% recycling by 2020 and reduced the quantity of municipal waste to landfill by three quarters since 2007. However, there is no greater challenge facing us today than climate change, and there is an urgent need to reduce our greenhouse gas emissions across all sectors including waste. Increasing our recycling and reducing landfill can contribute to this and the proposals in this consultation can assist in achieving this.

This abridge version of the consultation is sets out the proposals to improve commonality in collections from households and Non-Household Municipal premises.

DAERA would now like to hear your views on how Northern Ireland can take steps towards improving the quality and quantity of household and non-household municipal recycling, how to improve reductions in food waste, how to cut landfill rates and how to get businesses on board to increase recycling rates. The aim of this consultation is to bring forward new policy options for an incoming Minister and questions focus on issues such as how new measures might best

be implemented, considering views on practicality, economic barriers and how the future of recycling in Northern Ireland might look.

You can find a copy of the questions associated with this consultation at Annex A. It is **not** essential for everyone to answer every question, rather, we would prefer you to **only** answer the questions you feel are relevant to you or the organisation you are responding on behalf of.

We are encouraging everyone to respond to this consultation through our Citizen Space website as this makes analysing the responses and any future decision making more consistent and provides better data outputs. However, if you cannot respond using the website and would like to submit your response using a different format, please contact [wastepolicyteam@daera-ni.gov.uk](mailto:wastepolicyteam@daera-ni.gov.uk) to discuss this.

**For more information on responding to this consultation and a link to the Citizen Space website please see Section 10 of this document.**

We look forward to hearing your views on these important issues.



# 1. Introduction

The Department for Agriculture, Environment and Rural Affairs (DAERA) is consulting on how the future of our resources and recycling in Northern Ireland (NI) might look. We want to improve the quality and quantity of household and non-household municipal recycling, reduce food waste, decrease the amount of waste we send to landfill and help enhance the services offered to households and businesses.

Resource and waste management has a key role to play in helping to tackle climate change and the transition to a low carbon, Circular Economy. We have ambition for change and key targets to meet, set out in legislation. We believe that the proposals set out in this consultation will help empower the waste sector to lead the way for other sectors through innovation and change, tackling emissions and improving our resource efficiency.

Previous engagement with stakeholders in 2020 provided positive responses to options that could change the way we manage our resources. Engagement with stakeholders has been ongoing since then, and in this formal consultation we are seeking to build on and further improve NI's successful track record on recycling over the last 20 years.

This consultation builds on our previous successes and addresses how changes to help futureproof the waste and resources sector can help us achieve the necessary reductions. The document has nine parts:

1. A call to action;
2. Support for Change, Building on Success and our Legislative Framework;
3. Policy Rationale;
4. Funding;
5. Stakeholder Engagement;
6. Audience;
7. Proposals to Improve Commonality in Collections from Households;
8. Proposals to Improve Recycling of Non-Household Municipal Waste; and
9. Responding to the Consultation.

The aim of this consultation is to gather your views on the proposals so that we can make changes in a practical, cost effective and environmentally sustainable way.

## 2. Part 1: Proposals to Improve Commonality in Collections from Households

In this consultation, 12 proposals are presented to seek views on improvements to collections from households, with an intention to improve commonality, drive up recycling rates and improve the quality of materials collected. These proposals are set out in sections 2.2 to 2.12.

### 2.1 Economic Impact Assessment/Regulatory Impact Assessment

Through our engagement with all eleven councils, extensive modelling has been carried out on household waste and recycling to help support these proposals. As a result, an economic impact assessment been produced to inform policy development.

The three options outlined in the [Regulatory Impact Assessment](#) (RIA)<sup>1</sup> were consolidated from a long list of scenarios. The underlying assumptions were tested with Councils and the top ranking, in terms of cost savings and performance, have been written up as part of the RIA. These options were considered in the Discussion Document and are based on the potential impact on recycling rate, reduced landfill tax, greenhouse gas avoidance, as well as giving indicative capital, operational and transition kerbside recycling and waste collection costs for NI overall.

Table 1 below summarises the net costs and savings of each scenario. All results are shown with constant prices and, where relevant, applying an annual discount rate of 3.5% per year<sup>2</sup>. The analysis follows the Aqua book principles throughout<sup>3</sup>.

Following analysis of responses to Discussion Document and supporting analysis in the Impact Assessment the options on which we are now consulting include:

- Restriction to residual waste capacity in household collections.
- Enhancements to household recycling capacity; and
- The development of a set of minimum service standards for local councils on delivering household recycling collections.

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<sup>1</sup> Regulatory Impact Assessment (RIA).

<sup>2</sup> HM Treasury, 2018, The Green Book: central government guidance on appraisal and evaluation.

<sup>3</sup> HM Treasury, 2015, The Aqua Book: guidance on producing quality analysis for government.

Summary of impacts of considered policy options (discounted, against baseline) Costs (+) savings (-)	Option 1 HH: Restricted or 3 weekly residual, multi-stream recycling and separate food NHM: DMR + separate food waste + separate glass	Option 2 HH: 3 weekly residual, multi-stream recycling and mixed food and garden waste NHM: DMR + separate food waste + separate glass	Option 3 HH: 3 weekly residual, two-stream recycling and separate food NHM: DMR + separate food waste + separate glass
Municipal recycling rate achievable	74% ** (61% HH, 84% NHM)	74% ** (62% HH, 84% NHM)	72% ** (57% HH, 84% NHM)
Additional LAs net waste management costs(+)/savings(-) from changes in dry recycling and food waste collections for all HHs	£60-80m: £76-101m capital and transition costs, -£16-21m savings on ongoing costs (one year) *	£49m: £66m capital and transition costs, -£17m savings on ongoing costs (one year)*	£72m: £75m capital and transition costs, -£3m savings on ongoing costs (one year)*
Net waste management costs (+)/savings(-) to NHM businesses under increased recycling collections	-£13.5m	-£13.5m	-£13.5m
Monetised benefit of avoided carbon emissions <sup>4</sup>	-£82-87m	-£84m	-£81m
Reduction in government landfill tax receipts (benefits to municipal )	£40-41m	£38m	£43m

Key: \* Cumulative savings would be seen over the life span of a vehicle (assumed 7 years) in options 1 and 2 that could offset the capital and transition costs. \*\* Contamination removed. + Costs. -Savings.

Table 1: Summary of impacts of considered policy options (discounted, against baseline).

<sup>4</sup> HM Treasury, 2021, Valuation of greenhouse gas emissions: for policy appraisal and evaluation - GOV.UK (www.gov.uk).

**2.2 Restriction of Residual Waste Capacity in Household Collections**

**Proposal 1: To restrict the residual waste capacity for households in Northern Ireland to a maximum of 90 litres per week, delivered either via a 180 litre wheeled bin collected fortnightly or a 240 litre wheeled bin collected every three weeks. Councils would decide on the most appropriate methodology for their own circumstances.**

Around 55% of what people put in their residual waste bins is potentially recyclable material. A [waste composition analysis](#) of kerbside collected household waste conducted in 2017, suggests that although there is separate kerbside food waste collection provided by Councils to all households, just under 25% of the residual waste bin is food waste. Just over 15% of our residual waste is paper and cardboard and 7% is glass.

These figures indicate the real opportunities to further reduce waste to landfill and increase recycling in Northern Ireland.

These figures indicate the real opportunities to further reduce waste to landfill and increase recycling in Northern Ireland. We are now consulting on restricting residual waste capacity in household collections. Councils across the UK (including in NI) who have already implemented restrictions on residual waste have typically achieved this through lower frequency collections or by reducing the volume of the residual waste container. [Research shows](#) that where a well communicated, high quality complementary recycling service is provided, restrictions to residual waste can deliver overall financial savings to the council, increase the capture of key, quality recyclable materials, and promote upward movement of resources within the waste hierarchy whilst maintaining high levels of public satisfaction.

Most councils in the UK that have already restricted residual waste capacity have done so by reducing the frequency of collections, shown in Table 2, as this does not require a wholesale purchase and distribution of replacement, smaller containers (and potentially the retrieval of spent containers) where wheeled bins are in operation.

	2009/10 - number of UK LA's	2021/22 - number of UK LA's
Weekly residual collections	245	158
Fortnightly residual collections	219	219
Three or four weekly residual collections	0	32

*Table 2: Frequency of residual waste collections operated by UK local authorities in 2009-10 and 2021/22. Source WRAP.*

WRAP's [2020 Recycling Tracker survey](#) found that there is a strong correlation with good recycling performance and restricted residual capacity. Almost three quarters (74%) of those with a 3-4 weekly collection of residual waste use a food waste recycling service, as do 62% of those with an effective residual waste capacity of 90L or less per week. Many councils have enhanced their recycling collections at the same time as the restriction to residual waste is implemented.

Currently in NI, most councils collect the equivalent of 120 litres of residual waste per week (normally 240 litre wheeled bins collected fortnightly). Average residual waste capacity provided by Councils in Wales, the highest performing recycling nation in the UK, shows that households have less than 100 litres per week for residual waste<sup>5</sup>. Four factors, are expected to further reduce the residual waste presented for collection by households across NI namely; pEPR; DRS; and clear and consistent communication and engagement with people.

## The Core Set

We are consulting on a comprehensive “core” set of recyclable materials to be collected from all households across all council areas in NI, which will mean that people have fewer materials to dispose of in their residual waste - key to growing the Circular Economy. The benefits of a core set are standardised communications to people and businesses/ organisations; opportunities for higher recycling and lower contamination rates; environmental benefits; and economic benefits to NI.

Proposal 6 in the Discussion Document set out that all Councils in NI should be required to restrict capacity for residual waste from households to help divert more materials from disposal and into the recyclable waste streams. The overall response was extremely positive, with 88% of those who answered agreeing that residual waste capacity should be restricted. Most respondents also believed the restriction of residual capacity should be accompanied by enhanced recycling services.

### 2.3 Options to Ensure Consistency in the Range of Dry Recyclables Collected from Households

***Proposal 2: To require local Councils to collect a core set of dry recyclables from households to help avoid confusion and improve consistency and the quality of recyclable material.***

DAERA considers it is now time to implement changes so that the same range, or “core set,” of materials is collected for recycling from every household in NI. Ensuring a common set of materials will help avoid confusion, enable harmonious communications to be promoted, improve consistency and quality in recycling which in turn supports more local reprocessing of material and the transition to circularity.

Proposal 9 in the [Discussion Document](#) set out that the core set of materials should be glass bottles and containers, paper and card, plastic bottles, plastic pots, tubs and trays, and steel and aluminium tins and cans. Respondents demonstrated a strong belief that those materials should be included in the core set but phased in over time.

<sup>5</sup> Swansea Council provides [60 litres per week](#).

Given the strong support shown in responses to the 2020 discussion document DAERA proposes to legislate that local authorities in NI be required to collect a ‘core set’ of dry recyclable materials from the kerbside of all households, including flats. This core set shall include the materials set out in Table 3.

Material type	Examples of items by material type
Glass bottles and containers	Drinks bottles, condiment bottles, jars etc. and their metal lids, which can easily be extracted.
Paper and card	Newspaper, cardboard packaging, writing paper etc.
Plastics	Bottles including drinks bottles, detergent, shampoo and cleaning products containers, and plastic pots, tubs and trays etc., plus cartons (such as Tetrapak®) which are treated as plastics in recycling collections, due to the plastic layer in the laminate.
Metal packaging	Aluminium cans, foil, aerosol and aluminium tubes such as those used for tomato purée, steel cans/ tins and aerosols.

Table 3: Materials to be included in the core set for household recycling collections.

Table 4 shows that in 2021/22, most councils in NI are already collecting the majority of these materials at the kerbside.

Material	Aerosols	Cartons	Card	Foil	Glass	Metal lids	Metals (cans/ tins)	Mixed plastic film (all)	Paper	Plastics: bottles, pots, tubs & trays
<b>Percentage of households provided with recycling collections of certain materials</b>										
2021/22	100%	100%	97%	93%	75%	65%	100%	0%	100%	100%

Table 4: Households in NI receive collections for recyclable material in 2021-22. Source: WRAP.

Recognising that there may need to be some changes to kerbside collection services, we would expect all councils to be able to provide a kerbside collection of the core dry recyclables within two years (24 months) of notification of a statutory requirement by which time implementation is expected to be complete.

In the [Discussion Document](#), there was agreement that the core set of materials collected at the kerbside should be regularly reviewed and possibly expanded, provided certain conditions are met.

The range of materials would only be added to the core set when supported by evidence that materials can reasonably be collected for recycling and can reasonably be recycled. By this, we mean that there is capacity locally in NI, GB and Ireland or if necessary, further afield into Europe, that it can technically be recycled and that the cost of reprocessing is not prohibitive.

### 2.3.1 Flexible Plastic Packaging (Plastic Films)

***Proposal 3: That additional materials are added to the core set over time when feasible, with flexible plastic packaging set to be collected from households by the end of the financial year 2026/2027***

The UK nations have previously consulted on the introduction of films and flexible packaging to kerbside recycling collections by 1st April 2027 in all nations as part of the pEPR scheme, (published in the [consultation response](#) March 2022). This obligation will be set in forthcoming regulations which will be applicable in NI, with the cost being met by packaging producers.

The core set would be reviewed at this juncture and flexible plastic packaging added. Flexible plastic packaging is defined as “plastic film and plastic packaging which is not rigid”. On this basis all local councils should provide a kerbside collection service of flexible plastic packaging as soon as possible and no later than two years (24 months) of notification of a statutory requirement to collect. We are also consulting on the circumstances which may delay implementation of changes to collections.

## 2.4 Enhancements to Improve Commonality in Recycling Services - Options for Collections from Households

***Proposal 4: To highlight NI’s unique legislation on the quality of dry recyclable materials, the proposed term QualiTEE should be adopted to describe the exceptions to collecting dry recyclable materials separately.***

[Research](#) on glass and [plastic](#) recycling<sup>6</sup> shows that greater separation of materials increases the likelihood of these resources being used in closed-loop recycling processes which significantly enhances the environmental and economic benefits. Furthermore, WRAP’s analysis of [WDF](#) shows that separately collected paper and card is much less likely to be exported beyond the EU for reprocessing but retained closer to its point of production, as also evidenced in 2020 by the [Confederation of Paper Industries](#). This provides vital raw materials for businesses, creates green jobs and infrastructure improvements and supports change by businesses to meet the ambitious 70% recycling requirement set out in the [Climate Change Act](#).

Shorter material supply chains, end destination visibility and reporting, and higher quality outputs are all conducive to the emerging requirements of producers and these will only become more of a priority as pEPR evolves. The [existing legislation](#) asserts that to achieve the high-quality recycling necessary for a Circular Economy and ensure we can reprocess as much of it as

<sup>6</sup> See also [A closed-loop system for recycled plastic bottles saves materials and CO2](#) • [Plastics Europe](#).

locally as is possible, the core recyclable waste streams must be collected separately from each other. The exceptions to this default position are where separate collection is not **Technically feasible**, would entail disproportionate **Economic costs**, or would not deliver the best **Environmental outcome** with the threshold set at meeting just one of these requirements for an exemption to be applicable.

Amendments to the WCLO sets out that any exceptions to the default separate collection position must produce recyclables of a **comparable Quality**. This is unique to NI. No other devolved administration in the UK has material quality enshrined in legislation. As a combined concept, DAERA is interested in your views on naming these exceptions **QualiTEE**, with the notion of comparable quality being fundamental to this new test whilst retaining the technical, economic and environmental aspects of the assessment.

With the legislation set out as it is, Councils that already operate fully separate collections would not need to conduct a QualiTEE assessment.

## 2.5 Establishing the Default Position on Dry Recyclable Collections

***Proposal 5: The default position for collection of dry recyclables from households is in four separate streams.***

DAERA would like your view on whether all councils should be required to introduce a 'multi-stream' collection of the core materials in the dry recycling stream to comply with the separate collection legislation. .

'Multi-stream' here means the separate collection of, as a minimum, (i) paper/card, (ii) plastics, (iii) metals, and (iv) glass at the kerbside, in appropriate containers **which need not be a separate container for each material**. Innovation in collection systems means that new containers have been developed to minimise the number of recycling containers that people use and the footprint that they occupy for households. Examples include 240l bins with inserts for the separate streams or stacker boxes. Please note that Proposal 9 outlines a proposed exemption for separate collection of metals and plastics, where we also are seeking your views.

## 2.6 Justifying Why Collections of Dry Recyclables Cannot Be Separated, While Ensuring Quality and Environmental Benefits

***Proposal 6: Standardised written assessments are prepared by councils where two or more dry recyclables are mixed during the collection process, evidencing why separate collections are not practicable and that Commingled recycling delivers recyclable material of comparable quality.***

There is an existing requirement in [The Waste Regulations \(Northern Ireland\) 2011](#)<sup>7</sup>, in Section 18 part (2) on local councils, *when collecting waste paper, metal, plastic or glass [to] take all such measures to ensure separate collection of that waste as are available to it*. At present

<sup>7</sup> Which was amended by the [2020 Regulations](#).



however, there is no standardised template, nor a legislative requirement for waste collectors to assess TEEP compliance, nor to provide details in a written document. The Northern Ireland Environment Agency (NIEA) is responsible for ensuring compliance with the duties set out in The Waste Regulations (Northern Ireland) 2011.

DAERA wants to ensure that written assessments are consistent and avoid unnecessary financial and resource burdens on Councils and NIEA. The aim is to improve the consistency of written assessments and the circumstances in which the exceptions apply as well as making them easier and less time consuming to complete. Where collection circumstances change, we would expect written assessments to be reviewed.

## **2.7 Details on the Exceptions to the Separate Collection of Dry Recyclables (QualiTEE) for Household Recycling**

***Proposal 7: A set of conditions should be set out that define comparable quality, best environmental outcome, technical feasibility and disproportionate economic cost- “QualiTEE”. Where conditions are met, an exception may apply, and two or more recyclable waste streams may be collected together from households.***

***Proposal 7a: Similar guidance on MRF sampling, to that used in England and Wales, should be introduced in NI to ensure that the quality of input and outputs for MRFs can be quantified.***

There are clear trends for a requirement for higher quality secondary materials in the global market such. To reduce NI's reliance on overseas markets and to maximise the capture of high-quality recyclables to grow the NI Circular Economy further, the highest value possible must be extracted from these materials. In order to achieve this the materials need to be of the highest quality.

DAERA wishes to see materials reprocessed as close to their place of production and collection as possible. The details of where there may be exceptions to the separate collections of dry recyclables (QualiTEE) are included in legislation and are set out below.

### **Disproportionate Economic Costs**

This refers to separate collection which does not cause excessive costs in comparison with the holistic cost of collecting and sorting of a co-collected recyclable streams, taking into account the cost of dealing with contamination and the added recyclate value likely to be observed for separately collection fractions.

Financial impacts could be evaluated in wider economic terms, where we seek your views.

The economic impact assessment linked to this consultation has incorporated real life values provided by councils and calculated average costs (see Annex C), categorised according to

principal recycling collection methodology. A similar meticulous modelling approach could be used to compare the costs of different types of collections and determined on a per household basis, or at an individual council level.

To determine and quantify, we need to understand from stakeholders what they consider a reasonable cost differential to be, and this may differ according to their context.

### Technically Feasible

By **technically feasible** we mean that the separate collection may be implemented through a system which has been proven to function in practice. Some factors may present technical issues in the short term, for instance depot space or availability of suitable containers. These issues could be resolved however through investment and time, in which case the factor is then economic. Where this is the case, consideration of factors in economic terms should be addressed in the relevant economic section of the written assessment, rather than technical.

Examples where local circumstances mean that it is not technically feasible to have separate collection could include, but are not limited to factors such as:

- Storage of containers at premises, outside of individual dwellings.

Note that the following issues are not considered by DAERA as within the scope of 'technically feasible' for the separate collection of recyclable materials:

- People or historical preferences; and
- Rurality - this should be considered in terms of the comparable quality, economic or environmental factors where relevant.

### Best Environmental Outcome

To make the case that separate collection of recyclables does not deliver the **best environmental outcome** compared to the collection of recyclable waste streams together, evidence could include a variety of sources, on which we seek your views.

Various sources of [information](#) demonstrate that greater separation of materials promotes closed-loop recycling processes, which significantly increases the overall environmental benefits gained. Producers who, through pEPR, will be funding a higher proportion of collection and reprocessing costs of packaging material, and with packaging recycling targets to attain, will require evidence that the recycling of packaging material is optimised. Evidence factors should be provided, to demonstrate the difference in environmental outcomes from mixed collections versus separate. Standard default values and data with clearly referenced sources would be provided by DAERA.

## Comparable Quality

It is proposed that two of the evidence factors outlined above are used to determine whether collecting paper, metal, plastic, or glass together results in output from those operations which is of comparable quality to that achieved through separate collection. Standard default values and data with clearly referenced sources could be provided by DAERA in conjunction with Industry. The factors could be comparable quantities (+/-2%) of each material stream sent for closed loop recycling; and comparable quantities (+/- 5%) of each material stream sent for open loop recycling.

### 2.8 Establishing Common Service Standards to Ensure Recycling Quality

***Proposal 8: The quality of recyclate for reprocessing is important and needs to be improved through changes to collections and clear measures should be set to describe quality.***

The co-mingled collection of some materials may result in environmental benefits similar to those observed for separate collection of the four recyclable streams (Proposal 5). Potential costs and technical feasibility notwithstanding, views are sought on material streams that could be co-collected and effectively still generate output material for recycling of a quality comparable with separate collection. Four options are set out for consideration.

Expanding the core set of materials collected for recycling will make more secondary material available for local reprocessors. This expansion cannot be to the detriment of recyclate quality. More restrictive export markets for dry recyclables in recent years have highlighted the need to improve the quality of recyclable materials collected to ensure access to suitable outlets. Higher quality secondary materials enables more closed-loop recycling, as part of our transition to a more Circular Economy.

### 2.9 Other Forms of Partially Separate Collections of Recycling

***Proposal 9: Commingled collection of plastics and metals should be exempt from requirements to collect these materials as separate fractions.***

Most UK Local Authorities that operate multi-stream recycling collections mix the metal and plastic streams in one compartment on the collection vehicle. These materials can be sold to reprocessors as one commodity or can be separated at a depot/transfer station or at a MRF. Co-mingled collection of plastics and metals in this manner is accepted by reprocessors as not having a significant impact on the quality of output material.

DAERA proposes to allow an exemption from the regulations where only plastic and metal is co-collected.

## 2.10 Food and Garden Waste Collections from Households

***Proposal 10: Revisions to household food waste collections to increase capture rates and improve the diversion of food waste from disposal should be introduced, ensuring all householders, including those living in flats, can recycle more and in time have access to separate, weekly food waste recycling collections.***

Annual waste statistics indicate that a significant amount of food and garden waste from households continues to end up in landfill, despite a comprehensive organics collection service being in place to approximately 98% of households in NI. This percentage is based on council's data supplied to WRAP.

If collected separately from residual waste, food and garden waste can be sent for in-vessel composting (IVC) or anaerobic digestion (AD). When treated at an AD plant, food waste breaks down in a controlled way and the methane can be converted into gas (biomethane) that can be fed into the national gas grid, used to generate electricity and/or heat, or used as a vehicle fuel. IVC can be used to treat food and garden waste mixtures where the organic matter breaks down into a material suitable for use as a soil conditioner. DAERA regards the move to AD for the treatment of separately collected food waste as an integral part to the greening of NI's energy infrastructure.

Improvements to food and garden waste collections and the diversion of more of this type of waste from landfill represents one of the biggest opportunities for decarbonising the waste sector and contributing to NI's net zero by 2050 target.

Currently, all councils in NI offer a collection of food and garden waste separately from residual waste. [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 when accounting for comparable residual waste collection systems and comparable levels of deprivation.

Where food and garden waste are collected separately, it is not necessary for garden waste to be treated at an IVC plant and in most cases, it is treated via Open Windrow Composting, a lower cost form<sup>8</sup> of treatment compared to IVC. DAERA is keen to build upon the existing infrastructure and well-established consumer behaviours for dealing with food and other organic wastes from households.

A key challenge for many NI councils is the range of pre-existing long-term contracts that may preclude a change in the short term to separate food waste collections. Taking account of these factors and the current starting point, DAERA is keen to hear views on a range of scenarios for separate food waste and other organic waste collections. Further waste composition analysis is being undertaken to check total quantities and capture rates of food waste.

8 WRAP's Gate Fee survey does not collate prices for OWC which remain relatively stable at £25-£30 per tonne as quoted in [letsrecycle.com](https://letsrecycle.com)

## 2.11 Mechanisms to Ensure Recycling is Undertaken Correctly by Households

***Proposal 11: Through collaboration with Councils, we will set out proportionate and robust guidelines for compliance and enforcement that enable Councils to enhance their waste and recycling services.***

Most of us want to do the right thing when we recycle. Even with greater consistency of what can and cannot be recycled, sometimes people will make mistakes. Feedback on when wrong items have been placed in containers is vital to improve the quality of recycling and to reduce contamination. Effective communication with people when they're not recycling correctly will ultimately lead to more interventions from, and potentially more resource requirements for, Councils. Therefore, DAERA wishes to understand more on what appropriate enforcement mechanisms might look like.

Through dialogue with DAERA, Councils have highlighted potential challenges with [current regulations](#) and sought further clarification concerning how proportionate and robust enforcement can support them with service improvements. We are proposing to amend these regulations to set out clear circumstances in which councils can take action against people who continually fail to recycle correctly.

## 2.12 Tools to Expand the Opportunities to Recycle More Materials with the Aim of Standardising Services

***Proposal 12: Non-Statutory Guidance will be provided to councils to expand the opportunities to recycle more materials and to embed best practice in existing services.***

DAERA wishes to provide Councils with a framework on good practice for collections from kerbside and communal dwellings, HWRCs and bring sites as Statutory rules and Non-Statutory Guidance. It is intended that the Non-Statutory Guidance would cover a broad range of waste streams which may include hazardous waste, textiles, batteries, Waste Electrical and Electronic Equipment (WEEE), cooking and engine oils and AHPs (absorbent hygiene products such as nappies and incontinence pads).

## 3. Part 2: Proposals to Improve Recycling of Non-Household Municipal Waste

### 3.1 Municipal Waste - the New Definition

Municipal waste is defined as waste from households and waste from other sources, such as retail, administration, education, health services, accommodation and food services, and other services and activities, which is similar in nature and composition to waste from households. .

### 3.2 Non-Household Municipal Recycling

***Proposal 13: The scope of the revised definition of municipal waste would include mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households. Specifically, wastes from production, agriculture, forestry, fishing, septic tanks and sewage network and treatment, including sewage sludge, end-of-life vehicles or waste generated by construction and demolition activities, are excluded.***

Although many businesses already recycle a lot of their waste, there are a large proportion of organisations (hereafter, NHM sector) that have the potential to significantly increase the quality and quantity of recycling by utilising recycling collection services, as found in the [Municipal Recycling Potential in NI](#) report.

To grow the Circular Economy, it will be necessary to increase the collection for recycling of dry recyclables and food waste from the NHM sector. In the absence of reliable NHM sector data, WRAP carried out extensive research in 2019 to estimate the quantity of NHM sector waste in NI. WRAP have updated the key data findings from the report, which are highlighted in the box below.

Updated data gathered by WRAP on the [Municipal Recycling Potential in NI](#) report

- A wide range of private and public sector organisations were identified as generating municipal waste. Within the proposed definition of NHM obligated organisations are various sectors and we are focusing on the sectors producing waste most similar in nature to that produced by households. The sectors in focus are Hospitality, Retail & Wholesale, Transport & Storage, Food Manufacturing, Education, Healthcare (not including clinical waste), Offices and other services (cinemas, libraries, sports centres, tourist information, etc).
- Indicative assumptions suggests 57,920 businesses appear to be generating waste as defined. Around 767,044 tonnes of waste is estimated to be generated each year from the obligated NHM sectors.
- From these 767,044 tonnes, it is estimated that 341,529 tonnes could be collected as dry material recyclates (including glass), c.176,898 tonnes represent total food waste available for recycling with an estimated 124,308 tonnes of non-recyclable materials.
- While some large businesses are already collecting a significant proportion of their waste for recycling, the majority of small business are either recycling small quantities of waste or none at all, with a calculated average NHM recycling rate of 40.6% across all NHM sectors.
- We are also aware that some small businesses take home their waste for recycling or waste disposal, which contravenes [Duty of Care requirements](#) that apply to businesses.

### 3.3 Options to Increase the Amount of Recycling from the Wider NHM Sector

***Proposal 14: Businesses and the wider non-household municipal (NHM) sector will be required to segregate from residual waste a core set of dry recyclables, to improve recycling behaviour and activity and ensure consistency between what people can recycle at home, at school and at work.***

Alongside the separate collection of food waste from all businesses, DAERA is proposing that all organisations that generate municipal waste be required to segregate a core set of dry recyclables from residual waste for collection. This core set of dry recyclables will include glass, paper and card, metals, and plastics as set out for household dry recycling. It mirrors that which we propose to collect from households, ensuring commonality between what people can recycle at home, at school and at work.

[Responses to the Discussion Document](#) found that 95% of respondents agreed that all organisations that produce municipal waste should be required to segregate dry recyclable material from residual waste so that it can be collected and recycled. 64% of respondents to the Discussion Document indicated that it should be practicable for businesses to segregate waste for recycling in all circumstances.

Additional responses showed that 89% of respondents agreed with the proposal for the core set of materials collected at the kerbside to be regularly reviewed and possibly expanded, provided certain conditions are met.<sup>9</sup>

### 3.4 Flexible Plastic Packaging Recycling from Businesses and the NHM Sector

***Proposal 15: Subject to the costs being covered by packaging EPR (pEPR) and confirmation that the material can reasonably be collected for recycling, additional materials will be added to the core set over time, with businesses and NHM producing premises to be required by legislation to segregate flexible plastic packaging for recycling no later than March 31st 2027.***

Changes for business and NHM sectors are required as a result of agreed and emerging EPR policies for packaging materials. The addition of new materials to the core set of recyclables should only be made when supported by evidence which demonstrates that the material can reasonably be collected for recycling and can reasonably be recycled.

For flexible plastic packaging to be added to the core set of recyclables, the costs of collection and sorting will need to be covered by producer payments under pEPR, which is required from 31st March 2027. We are seeking views on timelines, practical solutions, and barriers to segregating flexible plastic packaging from residual waste for recycling from business and NHM sectors. Flexible plastic packaging, more commonly known as plastic film, refers to the lightweight material used mostly in food packaging to extend the life of fresh food products, reducing food waste.

### 3.5 Non-Household Municipal Waste - Food Waste Collections

***Proposal 16: The Food Waste Regulations (Northern Ireland) 2015 will be revised to require all NHM premises which generate food waste, to be required to segregate food waste from their residual waste for recycling. An additional two years to implement such changes will be granted for small and micro sized businesses.***

In the Discussion Document, DAERA sought views on a range of proposals designed to increase recycling in the NHM sector. This included a proposal to review [The Food Waste Regulations \(Northern Ireland\) 2015](#) to ensure obligated businesses segregate food waste for separate collection. The proposal also sought views on extending the Regulations to all

<sup>9</sup> No respondents disagreed with the proposal, 1 respondent was not sure and 5 respondents didn't not answer this question. Thus in total, across all respondents to the question, 98% answered "yes".



business categories, not just food businesses. [88% of respondents](#) agreed that The Food Waste Regulations (Northern Ireland) 2015 should be reviewed to ensure that obligated businesses segregate their food waste for collection. Currently, the Regulations only place an obligation on food businesses producing more than 5kg of food waste per week to present it for separate collection. DAERA is now proposing that the Regulations be extended to include all businesses, regardless of size and amount of food waste generated.

DAERA proposes to provide any newly obligated businesses with a notification of at least two years for the statutory requirement to segregate their food waste for recycling and are consulting on whether micro-firms and small firms should be exempt from such requirement or phased into the requirements a further two years later, providing them with four years to implement the required changes. Alternatively, the quantity of food waste produced by a business could be used to determine if the Regulations apply and we are also seeking views on this approach.

### **Anaerobic Digestion as the Preferred Method of Food Waste Treatment**

***Proposal 17: For separately collected food waste from businesses and the wider NHM sector, anaerobic digestion is our preferred method of treatment.***

If collected separately from residual waste, food waste can be sent for in-vessel composting (IVC) or anaerobic digestion (AD) as described in section 2.10. As food waste will be collected separately from businesses and the wider NHM sector, we propose that AD is the preferred good practice treatment for food waste from the NHM sector. Your views on this proposal are welcomed.

### **3.6 Justifying Why Collections of Dry Recyclables from Businesses and the NHM Sector Cannot be Separated While Ensuring Good Quality and Positive Environmental Outcomes**

***Proposal 18: Recyclables produced by businesses and the NHM sector should be collected separately from residual waste, and separately from each other, unless comparable quality is achieved through commingled collection of materials beyond plastics and metals only, and separate collection is not technically feasible, incurs disproportionate economic costs or does not deliver the best environmental outcome; or if a permitted exemption to this requirement is set out in legislation.***

Requirements set out on separate collections for household waste in The Waste (Circular Economy) (Amendment) Regulations (Northern Ireland) 2020 apply equally to carriers of controlled waste<sup>10</sup> as they apply to district Councils as set out in section 20 of [The Waste Regulations \(Northern Ireland\) 2011](#).

<sup>10</sup> Controlled waste includes NHM waste, but is a broader term encompassing agricultural waste and construction and demolition wastes, for example.

As we [set out in our proposals for household recycling](#), to achieve the high-quality recycling necessary for a Circular Economy and to ensure we can reprocess as much of it as locally as possible, the core set of dry recyclables must be collected separately from each other, except where comparable quality is achieved through co-mingled collection of materials beyond plastics and metals only and separate collection is not technically feasible, would entail disproportionate economic costs or does not deliver the best environmental outcome.

### 3.7 Details on the Exceptions to the Separate Collection of Dry Recyclables (QualiTEE) from Businesses and the NHM Sector

***Proposal 19: Proposals on conditions where an exception may apply, and two or more recyclable waste streams may be collected together from businesses and the wider NHM sector, which would be required two years following a requirement in legislation to collect NHM recycling separately. In the interim, waste carriers would be encouraged to have regard to the principle of QualiTEE.***

As set out for household recycling collections in sections 2.8 and 2.8, DAERA wishes to see materials reprocessed as close to their place of production and collection as possible. The details of where there may be exceptions to the separate collections of dry recyclables (QualiTEE) are included in The Waste (Circular Economy) (Amendment) Regulations (Northern Ireland) 2020, which amends the Waste Regulations (Northern Ireland) 2011, are set out below:

#### Disproportionate Economic Costs

Disproportionate economic costs refer to separate collection which does not cause excessive costs in comparison with the holistic cost of collecting and sorting of a co-collected recyclable streams, taking into account the cost of dealing with contamination and the added recycle value likely to be observed for separately collected fractions.

DAERA considers that while it is up to an individual NHM obligated organisation to decide if economic cost differences between separate or mixed recycling collection schemes are disproportionately higher, this should not result in some NHM organisations paying unnecessary additional costs. This is particularly pertinent in the case of NHM organisations that are hard to reach, or that generate waste in such small quantities that collections may be uneconomic for waste carriers to operate services.

Councils have a duty to offer services to NHM organisations that request waste and recycling collections (article 2 of the Waste and Contaminated Land (NI) Order 1997). Where Councils are requested to provide separate collections of recycling to NHM organisations that are costly to operate, we would be interested to hear your views on the economic impacts of separate recycling collections. We need to understand from stakeholders what contextual factors will create disproportionate economic costs to operate separate collections.

The contextual factors for consideration are distance of an organisation from other NHM obligated organisations is more than 3 miles, quantity of all core recyclable materials is less than 3 kg per week - roughly equivalent to average yields for an individual household; and use of survival sacks<sup>11</sup> to be collected alongside residual waste.

Where the contextual factors indicate that the distance to travel and/ or the quantity of recycling is very low, we would be pleased to hear your opinions on whether the requirement for separate, or any, recycling collections could be waived, and councils could direct organisations to alternative facilities.

Expanding the breadth of materials collected for recycling will make more secondary material available for reprocessors. Yet just as pressing is the need to improve the quality of recycle collected for reprocessing, ensuring that contamination levels from non-target or non-recyclables materials are reduced, and where possible, eliminated.

It is DAERA's aim to maximise the capture of recyclables, improve the quality of what is collected, and ideally process them back in the local economy. When considering significant environmental benefit and [comparable quality](#), the use of the resulting recycle collected i.e., entering closed or open-loop recycling, process loss and contamination levels should be ideally considered as evidence factors. However, information on these factors is **not** currently required to be gathered for NHM recycling, although plans [for future UK-wide digital waste tracking](#) set out to address this. Therefore, waste carriers are encouraged to consider the broader principles of environmental benefit and comparable quality when determining collection systems for NHM recycling.

### Technically Feasible

A range of circumstances are included and excluded by DAERA as [Technically Feasible](#). Some factors may present technical issues in the short term, for instance depot space or availability of suitable containers.

Note that the following issues are not considered by DAERA within the scope of 'technically feasible' for the separate collection of waste:

- NHM sector or collector preferences; and
- Rurality - this should be considered in terms of the quality or environmental factors where relevant.

As data on two of the four QualiTEE factors are not yet available, we propose that for the first two years of implementation of requirements for separate collections of NHM recycling, that waste carriers have regard to the principle of QualiTEE. It is proposed that waste carriers would conduct QualiTEE assessments after this two-year period if they wished to collect two or more recyclable materials mixed.

<sup>11</sup> A survival sack is often brightly coloured and easy to pull out from other materials at a MRF or other facility. It will contain materials targeted for collection that are exceptions from the normal collected set.

### 3.8 Written assessments from Waste Collectors for Recycling Collected from Businesses and the NHM Sector.

***Proposal 20: Written assessments should be completed by waste collectors that co-collect dry recyclables from NHM premises, evidencing why separate collections are not practicable and that commingled collection delivers recyclable materials of comparable quality to those collected as separate fractions. Collectors must ensure that where they deviate from a standardised template, their output information attains the same evidential threshold. Regular reviews of such assessments should be undertaken to ensure that they remain accurate and up to date.***

At present however, there is no standardised template, nor a legislative requirement for waste collectors to assess **QualiTEE** compliance and provide details in a written document. NIEA is responsible for enforcing compliance with the duties set out in [The Waste Regulations \(Northern Ireland\) 2011](#). DAERA wants to ensure that written assessments for the NHM sector are consistent and avoid unnecessary burden on waste collectors and the NIEA. Additional guidance could also be provided on what criteria may be included in the written assessments based on the regulations.

To provide guidance to waste collectors on the type of assessment required, we have provided a template for a written assessment in Appendix 3 of the main document, which waste collectors could adapt where appropriate. We anticipate that this template could include default values provided by DAERA, for example on greenhouse gas emissions, to allow standardised calculations to be made.

Collectors can choose to use the provided template written assessment or choose to use an adapted version; however, they must ensure an appropriate level of evidence-based detail is provided, to justify why dry recyclable streams cannot be separately collected.

Where collection circumstances change, which may be more commonplace for recycling collections from businesses, written assessments should be regularly reviewed. Waste collectors should also complete one version of the written assessment form for each set of premises for which they intend to rely on one of the exceptions (comparable quality, technical feasibility and best available environmental outcome), to set out why the exception applies.

### 3.9 Establishing NHM Service Standards to Improve Recycling Collections

***Proposal 21: To introduce, or where existing, improve NHM recycling collections.***

In the Discussion Document, [63% of respondents](#) indicated mixed dry recycling, separate food waste recycling and separate glass collection as their preferred option (as opposed to 7% in favour of mixed dry recycling, separate food waste recycling, no glass recycling). In addition, 23% of respondents favoured options that were not neatly described, with some suggesting fully mixed collections of dry materials or a combination of no glass, separate glass, or a commingled collection.

Positive responses to options in the Discussion Document, warrant your further views, namely:

**(i) mixed dry recycling and separate food waste**

This option would require all businesses and public sector organisations to separate the following streams from residual waste: a) food waste; and b) dry mixed recycling comprising plastics, paper & card and cans.

It was estimated this could deliver a recycling rate of over 70% for the NHM sector as calculated in the [Regulatory Impact Assessment](#) (Annex C).

**(ii) mixed dry recycling, separate glass, and separate food waste**

In this option, all businesses and organisations would be required to collect separately from residual waste: a) food waste; b) dry mixed recycling comprising plastics, paper & card and cans; with c) glass collected as a separate fraction where this material is generated in quantities above the capacity of a 120 L wheeled bin per week<sup>12</sup>.

It was estimated that this option could deliver a four-percentage point uplift in recycling performance where glass is required to be collected separately from residual waste and other dry recycling streams, but in all other respects is unchanged from option (i).

### 3.10 Reducing Barriers to Recycling for Non-Household Municipal Waste Sector

***Proposal 22: We will continue to review and investigate options to reduce costs for businesses and NHM premises where possible to maximise their recycling behaviour and activity.***

DAERA recognises the challenges faced by some businesses and the barriers that exist to achieving higher recycling rates, particularly for small and micro-firms. We want to improve access to recycling, reduce the costs for businesses as far as is feasible and remove or reduce these barriers. Such barriers might include:

- financial constraints;
- binding contractual terms preventing changes to a service, in that contracts are usually a minimum of 1year in length and changes are not usually possible;
- space for segregation of waste, particularly at smaller premises;
- lower levels of staff engagement and knowledge to segregate waste; and
- limits to services offered by waste contractors.

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<sup>12</sup> The maximum weight of material that can be accommodated in [one manufacturer's example](#) of a 120l wheeled bin is 48 kg. The bulk density, [estimated by WRAP](#), of uncompacted glass in a box is 276kg/m<sup>3</sup>. Thus, the weight of uncompacted glass in a 120l bin would be approximately 33kg. With the weight of an empty bin at 8kg, we feel that 120l provides appropriate containment for glass than can be safely handled and well within the quoted tolerance of 48kg.

There may also be additional barriers to recycling faced by businesses in rural locations, businesses based in homes and non-domestic premises. Understanding legislative changes and requirements can also be more difficult for some types of businesses.

In the [Discussion Document](#), DAERA sought views on options to maximise business recycling whilst alleviating the cost burden on businesses where possible. DAERA has hosted a series of workshops with local councils, waste sorters, collectors and reprocessors, trade bodies and business support organisations to outline potential changes to waste collections.

We would like to hear views on the type(s) of business support that 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.

A key learning point from responses to the Discussion Document was a call for more information on recycling in workplace or NHM settings. Whilst DAERA recognises the challenges that exist, there are opportunities through networks that can be used to disseminate information on planned future reforms to waste collection services. DAERA will continue to engage with these networks and explore dissemination routes with stakeholders.

### 3.11 Arrangements for Micro Firms or Small Firms

***Proposal 23: Businesses and the NHM sector will be provided with a minimum two-year notification of a statutory requirement to collect dry recyclables as separate streams, segregated from residual waste, with a further phasing of such legislative requirements for small and micro businesses producing NHM waste.***

Recognising that greater barriers may exist for small firms and micro firms with further barriers to recycling potentially faced by those businesses operating in rural locations, businesses based in homes and non-domestic premises, we wish to receive views on options which could exempt micro or small firms from the changes or provide them with additional time to prepare. We wish to receive your views on these two options: **Option 1** Micro and small firms/producers of NHM waste should be exempt from the requirement and **Option 2** where micro and small firms/producers are phased into the proposed recycling commonality requirements.

We are also consulting on the barriers to waste collectors' abilities to collect the required dry recyclable streams from all of the NHM sector, including from small and micro firms, in the time frame proposed.

### 3.12 Waste Franchising / Zoning: To Review Collection Zoning and Franchising for Businesses and NHM Premises

***Proposal 24 - to review collection zoning and franchising to reduce costs to businesses and NHM premises.***

Franchising or zoning of waste or recycling collection services could be used as an approach to alleviate cost on businesses, where partnerships or local councils would collect waste from businesses and other similar organisations in particular areas of a defined geographic area (e.g., town), through an awarded contract.

DAERA proposes to continue to explore options to potentially reduce the cost burden for NHM waste producers and are seeking further views on waste zoning/franchising and collaborative procurement options. We continue to develop these and other cost reduction options consulted on previously.

In the Discussion Document, we asked for views on regional procurement of services to enable economies of scale and potentially reduce charges levied on businesses. [75% of respondents](#) said that regional procurement would be very likely or likely to reduce charges levied on businesses.

If a franchising/zoning scheme were to be introduced, we are interested in your views on the recyclable streams that should be included under a potential franchising/zoning scheme available for NHM.

Similarly, opinions are sought for the types of zoning, the sizes of zones and/or collaborative procurement options.

As part of the consultation on franchising and zoning, we wish to know what the roles of stakeholders could be. We see the stakeholder groups as being DAERA, NIEA, BIDs, Non-Governmental Organisations (NGOs), waste producers, Councils, and trade bodies, although there may be other groups too.

### 3.13 Options to Provide NHM Waste Bring Sites and/or Access to Household Waste Recycling Centres (HWRCs) for Businesses and the Wider NHM Sector

***Proposal 25: To establish commercial waste bring sites and/or to increase the access to HWRCs for businesses, public bodies, and other organisations to encourage more recycling and better waste management.***

As well as dedicated collections from business or NHM premises, extending the range of facilities where waste or recyclables could be taken for disposal or recycling could help small or micro firms to recycle more, whilst increasing convenience, reducing costs and any space

issues. Such facilities could be developed for small firms to deposit high quality recyclables or could be attached to other waste management facilities such as HWRCs.

By allowing smaller businesses access to HWRCs, councils may be able to limit the operational challenges of providing collections to smaller businesses. Good practice information can be found in [“drop-off” guide](#). The opportunity to implement charges is in line with existing legislation and waste classifications as detailed in [The Controlled Waste and Duty of Care Regulations \(NI\) 2013](#).

The Department would also like to receive views on the viability of commercial waste bring sites, to facilitate an increase in recycling for businesses and the NHM sector. We are seeking to explore the types of barriers regarding the creation and operation of commercial waste bring sites, such as lack of suitable location(s), access restrictions and risks of misuse of sites or contamination of recycling.

### **3.14 Non-Household Municipal Waste - Compliance & Enforcement**

***Proposal 26: Amendments will be made to Article 5 of The Waste and Contaminated Land (Northern Ireland) Order 1997 to ensure compliance with the post-consultation requirements to segregate a core set of dry recyclables and food waste by obligated businesses and the wider NHM sector.***

We propose to extend Article 5 of The [Waste and Contaminated Land \(Northern Ireland\) Order 1997](#) to ensure compliance with the requirements that will be set out subsequent to this consultation, to segregate a core set of dry recyclables and food waste by obligated businesses, public bodies, and other organisations. The Article relates to the Duty of Care of waste producers and requires DAERA, following consultation, to prepare and issue a code of practice. We are seeking your views on this. We are also interested in opinions on the appropriate level of penalty for non-compliance. By comparison, the fixed penalty on a waste carrier or producer for not supplying documents is currently set at £300.



## 4. Responding to the Consultation

### 4.1 Responses

You can find a copy of the questions associated with this consultation at Annex A. It is **not** essential for everyone to answer every question, rather, we would prefer you to **only** answer the questions you feel are relevant to you or the organisation you are responding on behalf of.

You can respond to this consultation online by accessing the consultation at the following link:

<https://consultations2.nidirect.gov.uk/daera/rethinking-our-resources>.



We are encouraging everyone to respond to this consultation through our Citizen Space website as this makes analysing the responses and any future decision making more consistent and provides better data outputs.

Written responses should be sent by email to: [wastepolicyteam@daera-ni.gov.uk](mailto:wastepolicyteam@daera-ni.gov.uk)

Or to postal address: Resources & Waste Strategy Team,  
Environmental Resources Policy Division,  
Department of Agriculture, Environment and Rural Affairs,  
Jubilee House,  
111 Ballykelly Road,  
Ballykelly, Limavady,  
BT49 9HP

When responding, please state whether you are doing so as an individual or representing the views of an organisation. If you are responding on behalf of an organisation, please make it clear who the organisation represents, and where applicable, how the views of its members were assembled.

### 4.2 Closing Date

Responses should be submitted by **5pm on Thursday 30th May 2024**.

### 4.3 Confidentiality

The Freedom of Information Act 2000 gives the public a right of access to any information held by a public authority, the Department in this case. This includes information provided in response to this consultation.

The Department will publish a synopsis of responses to the consultation. This will include a list of names of organisations that responded but not personal names, addresses or other contact details.

The Department cannot automatically consider information supplied to it in response to a consultation, to be confidential. However, it does have a responsibility to decide whether any information provided by you in response to a consultation, including information about your identity, should be made public or treated as confidential. If you do not wish information about your identity to be made public, please include an explanation in your response. Please be aware that confidentiality cannot be guaranteed. Please note, if your computer automatically includes a confidentiality disclaimer, it won't count as a confidentiality request.

Should you respond in an individual capacity the Department will process your personal data in accordance with the Data Protection Act 1998. This means that your personal information will not be disclosed to third parties should you request confidentiality.

For further information about confidentiality of responses please contact the Information Commissioners Office (see its website at [Information Commissioner's Office \(ICO\)](#)).

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