



# Rethinking Our Resources:

## Northern Ireland Resources and Waste Management Strategy - Questions



Department of  
Agriculture, Environment  
and Rural Affairs

An Roinn

Talmhaíochta, Comhshaoil  
agus Gnóthaí Tuaithe

Department of

Fairmin, Environment  
an' Kintra Matthers

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

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# Public Consultation: Rethinking Our Resources - Northern Ireland Resources and Waste Management Strategy

## Purpose

The Department of Agriculture, Environment and Rural Affairs (DAERA) is seeking views on the draft Resources and Waste Management Strategy for Northern Ireland.

This consultation process covers a range of issues relevant to the development of an updated Northern Ireland Resources and Waste Management Strategy. This new strategy aims to maximise the potential for better use of the resources consumed in Northern Ireland, to prevent them becoming waste, or where generated, to ensure they are captured and processed into products that minimise environmental pollution. The strategy builds on previous plans by broadening the range of sectors obligated, presenting new actions to achieve higher targets, and setting out the greater ambition necessary to meet net zero. In proposing considerable improvements to the management of all Northern Ireland's waste, the strategy provides a wider range of drivers and support based on the recognition of the different levels of potential from all stakeholders in the value chain. The actions within the strategy are designed to help Northern Ireland achieve both the Circular Economy Package targets and the recycling target set out in the Climate Change Act (Northern Ireland) 2022 that will require contributions from a wide range of sectors.

The Circular Economy Package targets include a municipal waste recycling target of 65% and a 10% cap on the amount of municipal waste going to landfill by 2035.

The Climate Change Act requires that at least 70% of waste must be recycled by 2030 in Northern Ireland.

## Layout of the Resources and Waste Management Strategy

The draft Northern Ireland Resources and Waste Management Strategy is divided into four parts..

- 1. Part 1: The Need for Change** - Outlines the vision, targets, and objectives driving the strategy.
- 2. Part 2: Enabling Change and Empowering Action** - Details actions for seven significant waste categories to drive the required change.
- 3. Part 3: Making it Happen** - Discusses the necessary conditions for effective resource management, including infrastructure, collaboration, communication, research, and enforcement.
- 4. Part 4: Monitoring Progress** - Explains how success will be measured and reported.

## Making a Submission

This consultation is organised around thematic areas. Respondents are requested to consider 27 questions, of which four are mandatory. Mandatory questions only relate to the respondent details. It is acknowledged that not all aspects of the strategy are relevant to all respondents.

**Part 1** - The Need for Change, sets the scene, outlining the overall vision, targets and objectives of the Resources and Waste Management Strategy. Questions in this section are optional.

**Part 2** - Enabling Change and Empowering Action, details actions across seven significant waste categories. Throughout this section respondents can choose which questions they wish to respond to and may choose to respond only to the questions or thematic areas relevant to them. Questions in this section are optional.

**Part 3** - Making it Happen, focusses on how we turn the Resources and Waste Management Strategy into reality and make it happen in Northern Ireland. Questions in this section are optional.

**Part 4** - Monitor and Evaluation, focusses on measuring progress through monitoring and evaluation. The question in this section is optional.

**Part 5** - Supporting Documentation, concentrates on the supporting documentation, specifically the Waste and Contaminated Land (NI) Order 1997 Requirements (WCLO), Strategic Environmental Assessment (SEA), Habitat Regulations Assessment (HRA), Equality Screening Assessment (EQIA) and Rural Needs Impact Assessment (RNIA). Questions in this section are optional.

All submissions are welcome and will be considered in developing the new Northern Ireland Resources and Waste Management Strategy.

Responses to this consultation are to be submitted online through Citizen Space. The consultation can be accessed following this link:

<https://www.daera-ni.gov.uk/consultations/rethinking-our-resources-northern-ireland-resources-and-waste-management-strategy>

## Question Summary and Response Required

Below is a summary of how the consultation is structured on Citizen Space.

There are a total of **27 questions** to be answered, with **four** of them mandatory.

Response Required	No of Questions	Mandatory	Optional
Introduction and respondent details	4 questions	✓	
<b>Part 1 - The Need for Change</b>			
Sets the scene and provides background to this strategy	3 questions		✓
<b>Part 2 - Enabling Change and Empowering Action</b>			
Climate Change Act (Northern Ireland) 2022	1 question		✓
Household waste	1 question		✓
Non-household municipal waste	1 question		✓
Commercial and industrial waste	1 question		✓
Construction and demolition waste	1 question		✓
Hazardous waste	1 question		✓
Agricultural waste	1 question		✓
Litter and fly-tipping	1 question		✓
Summary	1 question		✓
<b>Part 3 - Making it Happen</b>			
Infrastructure and capacity	1 question		✓
Working Together to Achieve Shared Goals	1 question		✓
Communication and engagement	1 question		✓
Research, Innovation and Skills, for the Future	1 question		✓
Enforcement	1 question		✓
<b>Part 4 - Monitoring Progress</b>			
Monitoring and Evaluation	1 question		✓
<b>Part 5 - Supporting Documentation</b>			
Waste and Contaminated Land (WCLO)	1 question		✓
Strategic Environmental Assessment (SEA)	1 question		✓
Habitat Regulatory Assessment (HRA)	1 question		✓
Equality Screening Assessment (EQIA)	1 question		✓
Rural Needs Impact Assessment (RNIA)	1 question		✓

## Data Protection

DAERA is committed to engaging with stakeholders in a clear, open, and transparent manner. Any person or organisation can make a submission in relation to this consultation via Citizen Space. Guidance is provided on the 'Confidentiality' of responses under the Freedom of Information Act 2000, in Annex 1 for your reference. Also, if you require any further information, please contact a member of the consultation team on [WastePolicyTeam@daera-ni.gov.uk](mailto:WastePolicyTeam@daera-ni.gov.uk)

## Introduction and Respondent Details

Northern Ireland has enormous opportunities to put the resources flowing through its economy to better use, increasing their value to the economy, offering scope for social gain, such as job creation, and reducing their impact on the environment. While the beginnings of a circular economy have emerged in recent years, with much higher recycling rates, there is potential to go further in realising value from the materials arising as waste at the end of their life. The strategy sets out the government's vision for a more progressive approach to managing waste in Northern Ireland and this consultation document is designed to capture your thoughts on the strategy.

Everyone uses resources and creates waste, whether at home as a householder, in the workplace, or out and about. Equally, most organisations generate or handle waste to a greater or lesser extent.

The range of stakeholders generating and handling resources includes citizens, councils and diverse business types including retail, hospitality, education, healthcare, transport and manufacturing. All these sectors produce varying quantities and types of waste, reflective of their size and current business operating models. Each stakeholder faces different levels of challenge in making the transition, and so to be effective the strategy aims to deliver actions that resolve burdens, designing and tailoring new support to each sector so that improvements can be made and further opportunities identified.

This consultation is open to anyone, but we expect it to be of greatest interest to:

- Councils
- Waste management companies
- Reprocessors
- Trade bodies
- Business and industry
- The agricultural sector
- The construction and demolition sector
- Environmental organisations and
- Non-Governmental Organisations (NGO)

Please complete questions 1 to 4, to allow us to capture the background and geographical location of respondents.

**Question 1: What is your name? Jennifer Stephens**

**Question 2: What is your email address? stephensj@belfastcity.gov.uk**

**Question 3: What local Council area do you live in?**

- Belfast City Council

**Question 4: Which category best represents you from the list below?**

- Local Government

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## Part 1: The Need for Change

Part 1, The Need for Change, provides the background to the Resources and Waste Management Strategy, explaining how it relates to previous strategy documents, relevant legislation at national, UK and international level, and the drivers for change.

Over the last two decades in Northern Ireland, we have made significant improvements in how our waste is managed, but new legal commitments and targets mean we now have a unique opportunity to put Northern Ireland's resources to better use, increasing their value to the economy, offering job creation and reducing their impact on the environment. Waste management is not just about how we treat waste but how we are able to manage our valuable resources throughout their full lifecycle by influencing how we consume, how we prevent waste, how we capture it for recycling and how we treat it at the end of its useful life. This is a core aim of the strategy.

Improving how resources and waste are managed will require action from all sectors. We recognise that everyone living and working here uses resources and creates waste. Equally, most organisations generate or handle waste to a greater or lesser extent. Some, such as councils, waste management companies and recyclers, have a particular interest in this strategy. Given this broad audience, the strategy has been written to be accessible to all. This means that some of the more detailed and technical areas of waste management will be found within the appendices, rather than the main document. A glossary is also available in the appendices.

### The Aim of the Resources and Waste Management Strategy

There is ambition to drive more waste diversion from sectors traditionally in scope of waste management plus new, previously underrepresented, areas. Achieving this will require the adoption of innovative and effective interventions.

The aim of this strategy is to outline a comprehensive framework to guide these interventions over the next 6 years (the lifetime of this strategy). By taking a proactive and robust approach, the proposed targets and actions aim to ensure long term sustainability, maximizing their positive impact even beyond the initial span of the strategy.

This will involve the integration of modern technology, collaborative partnerships and policy reforms to deliver measurable outcomes. By focusing on both immediate and enduring solutions the strategy seeks to establish a transformative shift in resource efficiency and waste diversion practices ensuring resilience and adaptability to future demands.

### The Scope of the Resources and Waste Management Strategy

The proposed scope of this strategy is for controlled wastes generated by households, commercial and industrial premises and category 3 animal by products as defined in Article 10 of Regulation (EC) 1069/2009. Managing these specific, yet widely generated resources, will make key contributions to the Climate Change Act recycling target and Net Zero commitments.

Whilst there are clear improvements in how Northern Ireland has managed its waste over time, international strategies show that, because of diminishing returns associated with the earlier

drivers, improving both resource use and waste diversion will require even more innovation and a redesign of policy measures to drive the necessary change. This strategy provides the long-term plan to drive significant environmental change, but it also provides clear, effective and realistic shorter-term tactics and actions necessary to drive the required outcomes.

Over the next few pages, we ask for your thoughts regarding our proposed vision, targets and objectives for the waste management strategy.

## Vision

Our vision is for a resource efficient country where we rethink how we deal with resources and waste, reducing and diverting overall waste, extracting the maximum value from recycling materials to deliver a low-carbon circular economy, with recovery and landfill as methods of last resort.

**Question 5: Do you agree with the vision for the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

- Agree in principle

Belfast City Council broadly agrees in principle that the strategy reflects the key principles of a circular economy including resource efficiency, waste reduction, maximizing value for materials and the use of recovery in landfill only as a last resort. The emphasis on and contributing to a low carbon economy is also welcomed and aligns with wider environmental and climate objectives.

However, while the vision sets a clear and positive direction of travel it is high level and would benefit from greater clarity on the practical enablers required to achieve it - in particular the vision focuses on outcomes, but it doesn't reference how these will be delivered.

Diverting waste from what to what? Vision would benefit from mention of application of the waste hierarchy. There is a lack of detail on infrastructure and enforcement powers.

Overall, the strategy lacks detail relating to what resources and support, both in terms of finances and guidance, will be made available to local authorities.

## Our Targets

Achieve a waste recycling rate of at least 70% by 2030.

Achieve a municipal waste recycling rate of 55% by 2025.

Achieve a municipal waste recycling rate of 60% by 2030.

Achieve a municipal waste recycling rate of 65% by 2035.

Achieve a 10% cap on the amount of waste going to landfill by 2035.

DAERA will continue to tackle the problem of littering and will continue to work with stakeholders to advance our anti-litter agenda including the introduction of bans or levies on certain materials.

DAERA will continue to lead the development of multi-year, integrated Communications and Engagement for waste and recycling.

DAERA will continue to support updating skills and training needs to facilitate a shift to a more Circular Economy in Northern Ireland.

DAERA will work with Devolved Administrations to develop and implement the first phase of mandatory Digital Waste Tracking across the UK by October 2026.

DAERA will continue to develop a greater understanding of Serious and Organised Crime's involvement in environmental crime, to enhance capabilities in tackling this issue.

**Question 6: Do you agree with the targets for the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

- Disagree

We note the first five references are targets and the second five are actions/aims and as such they are not measurable. How will DAERA approach measuring the level of any outcome or apply metrics to indicate that they have been achieved and to what level? We also query the target noted for 2025 of achieving 55% municipal waste recycling, when the timeframe has passed.

Additional power and supporting legislation for local authorities will be needed and a clear understanding of the expectations and the requirements on local authorities in terms of both household, commercial waste and recycling.

One area not outlined here is carbon, which could help promote the Climate theme, by not just focusing on recycling but also on prevention and reduction. Perhaps there should be a target for a carbon-based approach and an applicable metric to measure levels of achievement.

From the document it seems that the Collaborative Change Programme may be ending so where is the financial support to address capital investment and ensure delivery of targets?

We query the 70% target for recycling levels to be achieved by 2030 in the Climate Act and note that the definition of recycling needs clarity. The Strategy would benefit from setting out specific actions, statutory levers (where appropriate), interim milestones, defined responsibilities, and monitoring arrangements. Without this level of detail, it is difficult to assess whether the targets are achievable or how progress will be tracked.

How councils will be funded to meet any new requirements and/or targets needs to be identified, we need a timed and consistent approach. This is particularly true as the impact of other parallel policies such as the Emissions Trading Scheme (ETS) for waste, the rollout of Deposit Return Scheme (DRS), and rollout of Digital Waste Tracking (DWT) are to increase disposal costs and reduce collected material value for local authorities over the next few years. DRS could reduce the quality of recycling collected by local authorities and we question what materials local authorities will be left with? Will it be poor quality material and will it divert good materials from municipal waste streams? The Circular Economy will mean more REDUCE + REUSE rather than recycle.

Overall, we feel there is a lack of infrastructure and the appropriate enforcement powers/legislation to support and enable these objectives. We welcome a clearer understanding of how these targets will be measured and monitored, how they will be resourced and what support will be in place to implement these.

## Objectives

### 1. Increase waste diversion

- Reduce reliance on landfill and recovery, reduce loss of valuable resources, reduce littering and reduce instances of waste crime.

### 2. Enhance Resource Efficiency

- Increase the quantity and quality of recycling to improve the environment, grow a low-carbon circular economy and to meet our legal targets.

### 3. Improve Communications and Skills

- Invest in comprehensive communication campaigns and behaviour change to improve resource and waste management. Work with the relevant sectors to ensure the right skills are in place to enable a transition to a circular economy.

### 4. Strengthen Partnerships and Collaboration

- Work with businesses, industries, communities and the waste sector to develop shared responsibility for waste management and sustainable resource use.

**Question 7: Do you agree with the objectives for the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

- Agree, in principle

Objective 1 - is welcome but greater emphasis could be placed on waste prevention and reduction at source, in line with the Waste Hierarchy, to ensure that the strategy prioritises “avoiding waste generation” in the first instance rather than managing it further downstream.

Objective 2 - could be strengthened by recognising the importance of developing end markets for recycled material and supporting wider circular economy activities such as “reuse” and “repair”

Objective 3 - would benefit from greater specificity in terms of HOW behavioural change will be achieved, measured and sustained across different sectors and communities.

Objective 4 – need clear definition of roles responsibilities and governance arrangements to ensure that partnership working translates into effective and coordinated action. We would also seek clarity on the role local authorities have to play in this.

Council would like to understand the detail behind the aspiration and recommends that the mandatory guidance on Collections Consistency/Simpler Recycling is required sooner rather than later. Also, the timing needs to be appropriate and achievable. SMART objectives from an operational perspective are needed to reflect what is operationally viable, allowing for effective monitoring and accountability.

Across all the objectives there are some notable gaps in particular no explicit reference to enforcement and compliance which are essential to ensuring adherence to the waste hierarchy and in tackling illegal waste activity.

The EFW infrastructure, which is the model in use currently and the roll-out of DRS could actually reduce quality of recycling, meaning that the recycling tonnage captured by local authorities could decrease leading to less efficient schemes. Without sufficient, sustained and timely funding, local authorities will be unable to increase performance to meet the targets set out in the draft strategy.

We feel these objectives are ambitious and want to understand the mechanisms and resourcing available to enable successful outcomes.

## Part 2: Enabling Change and Empowering Action

Part 2, Enabling Change and Empowering Action, addresses the seven categories of waste that either form a significant part of Northern Ireland's waste stream, such as household waste, or that warrant specific consideration because of their impacts, for example hazardous waste.

The proposed scope of the Resources and Waste Management Strategy is for controlled wastes generated by households, commercial and industrial premises and category 3 animal by products, as defined in Article 10 of Regulation (EC) 1069/2009.

This part of the strategy sets out seven categories of waste:

1. Household waste
2. Non-household municipal waste
3. Commercial and industrial waste
4. Construction and demolition waste
5. Hazardous waste
6. Agricultural waste
7. Litter and fly-tipping

Specific sections in the strategy, for each of the seven categories of waste, summarise the:

- sector background,
- key challenges for managing this waste,
- proposed targets, and
- proposed actions necessary to drive the required change.

## Climate Change

Section 18 of the [Climate Change Act \(NI\) 2022](#) states that the Department must ensure that at least 70% of waste is recycled by 2030, and it must also develop and publish sectoral plans for the waste management sector setting out how the sector will contribute to the achievement of the targets in the Act. Using this consultation, DAERA aim to define the scope of the 70% recycling target and identify the contributions.

**Question 8: Do you agree that the sectors in scope of the draft Resources and Waste Management Strategy, which are controlled wastes consisting of household waste, non-household municipal waste, commercial and industrial waste, construction and demolition waste, hazardous waste and agricultural waste, should be the sectors in scope of achieving the Climate Change Act (NI) 2022 70% recycling rate target for Northern Ireland?**

- Agree in principle

We agree in principle.

We note that there is no specific target for litter included in the 70% figure. The waste data flow system can collect this information; so, we query why it is not reflected here, in fact there are several areas/sectors not included that should be contributing to the 70% recycling target.

Greater clarity is needed to specify whether the 70% figure relates to total waste arising, municipal waste only, or particular waste streams, and how performance will be measured, reported, and verified. It is not evident what new interventions will be introduced, what will materially change, or what will be done differently to drive improved performance.

## Household waste

The Climate Change Act (Northern Ireland) 2022 incorporates several requirements for the decarbonization of the waste sector. It is important to note that the 70% recycling target in this Act potentially relates to all waste generated in Northern Ireland, not specifically household waste.

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 similar to that from households.

The targets and actions relevant to each are set out below.

### Targets

1. Achieve a waste recycling rate of at least 70% by 2030;

2. Achieve a municipal waste recycling rate of 55% by 2025;
3. Achieve a municipal waste recycling rate of 60% by 2030;
4. Achieve a municipal waste recycling rate of 65% by 2035; and
5. Achieve a 10% cap on the amount of waste going to landfill by 2035.

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### Actions

DAERA commits to the following actions:

#### *Increase our recycling rates and improve material quality*

- 1) Define what is to be included in the waste recycling 70% target and identify the contributions required from the household, business, commercial and industrial sectors by the end of December 2026.
- 2) Introduce an EPR scheme for household packaging by end of December 2025.
- 3) Flexible plastic packaging to be collected for recycling from households by 31 March 2027.
- 4) Develop reform of the Producer Responsibility Schemes for WEEE and Batteries by 2027, and End of Life Vehicles in line with Windsor Framework requirements and UK ambition.
- 5) Introduce DRS for single use drinks containers in Northern Ireland by the end of December 2027.
- 6) By 31 March 2027, conduct an up-to-date waste compositional analysis to determine the composition of household waste in Northern Ireland.
- 7) Develop guidance to ensure all councils in Northern Ireland collect a core set of materials that includes glass bottles, paper and card, plastic bottles, plastic pots tubs and trays, cartons and metal packaging. Plastic film will be introduced to the core set by the end of March 2027. The core set will be reviewed regularly.
- 8) Develop guidance to set out minimum service standards for local councils on delivering household recycling collections, in collaboration with all councils and wider stakeholders by the end of March 2027.
- 9) Develop plans to ensure that all councils provide food waste collection services to all households in Northern Ireland and enhance their existing food waste collections to increase capture of food waste.
- 10) Administer the Household Waste Recycling Collaborative Change Programme (HWRCCP) as a funding mechanism for Councils to transform kerbside recycling and Household Recycling Centre infrastructure and services to realise the economic potential of recycling to the economy. Final applications by 31st March 2026.

#### *Reduce waste going to landfill*

- 11) Implement measures to divert more biodegradable waste from landfill by the end of December 2027.
- 12) Develop guidance for all councils in Northern Ireland to assist in reducing residual waste collected from households, reflecting the move towards the collection of more recyclables, reuse and waste prevention by the end of March 2027. Household circumstances will be considered and exemptions provided where appropriate.

**Promote waste prevention and reuse**

- 13) Implement and review the activities in the Waste Prevention Programme by the end of December 2026.
- 14) Review the feasibility of setting waste prevention targets for Northern Ireland.

**Promote more sustainable and efficient use of our resources**

- 15) Continue to promote the MyRecyclingNI website and encourage councils to improve their end destination data reporting to ensure households understand where their recyclable materials are being processed.

**Question 9: Do you support the following actions set out for household waste in the draft Resources and Waste Management Strategy?**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Increase our recycling rates and improve material quality</b>				
Actions 1 to 10 proposed to increase recycling rates and improve recycling quality of household waste	Yes, support			
<b>Reduce waste going to landfill</b>				
Actions 11 to 12 proposed to reduce the amount of waste arisings from households going to landfill	Yes, support			
<b>Promote waste prevention and reuse</b>				
Actions 13 to 14 proposed to promote household waste prevention and reuse in Northern Ireland (These actions are in conjunction with those in the Waste Prevention Programme)	Yes, support			
<b>Promote more sustainable and efficient use of our resources</b>				
Action 15 proposed to promote more sustainable and efficient use of our resources generated from household waste	Yes, support			

We have some reservations on the timings and support in terms of legislation to take forward these actions. One area which needs more clarity is the "Consistency in Collections" document - is the nature of this document mandatory or advisory? What is the timetable for delivery?

Take the case of Wales, second in the world in recycling. They are working with a solid policy and legal framework supported by significant financial resources. We suggest DAERA adopt a similar approach. In addition, we suggest individual targets per authority, factoring in the circumstances encountered by each local authority, e.g. social deprivation, urban/rural housing stock. We believe a modelling exercise is needed and that the strategy objectives align to the Circular Economy, (still being considered by government.)

Timing is a major concern, e.g. the level of infrastructure required to accept flexible plastics from April 2027, may not be developed locally in time and may require export. The conditions and environment need to be created to attract local investment. We recommend that DEARA develop these actions collaboratively with councils and that appropriate funding made available for this.

In Action 4, clarification is needed on the obligations for council to collect. Or will disposal be conducted via contracted services? In terms of finances, future costs from the inclusion of waste into the ETS and the loss of valuable recyclables (aluminum) through DRS, need to be factored when collaborating with councils on actions. There is a potential requirement to consider locked bins to counteract scavenging for item falling under DRS as indicated in Wales.

The proposed guidance is welcomed, however clarity on whether it is statutory, or mandatory is needed. To deliver the targets it is likely that a mandatory approach would drive the desired change. This was the case when the Food Waste Regulations were introduced in 2015 and the mandatory requirement for Councils to provide the service by April 2017 resulted in all Councils moving together and a significant uplift in organic tonnages and NI recycling rate.

Overall, there is an ask for endorsement of these actions. We seek clarity and details on type of support, the stages involved, timing and funding - especially when considering actions 8, 9, & 11. There needs to be a statutory requirement to implement and achieve this model. Collaboration with councils is needed.

Action 10 and 2 are completed therefore, we note that there are 8 actions within this area.

In terms of Actions 12 to 15, what measures are proposed for enforcement, comms and achieving compliance? Prevention is referenced in section 47 of the 1990 act, however it's not applicable to Northern Ireland therefore we do not have the enforcement powers, to support some of the actions proposed.

Government position on export in the absence of local infrastructure needs to be clear. In addition it needs to be specified what reduction in recovery is required as this does not appear to have been quantified.

Measures need to be defined and should also cover commercial and industrial waste.

## Non-household municipal waste

The Climate Change Act (Northern Ireland) 2022 incorporates several requirements for the decarbonisation of the waste sector. It is important to note that the 70% recycling target in this Act potentially relates to all waste generated in Northern Ireland, not specifically non-household waste.

Amendments made in 2020 to the Waste and Contaminated Land (Northern Ireland) Order 1997 (WCLO) introduced new municipal recycling targets - for households and businesses who produce waste similar to that from households.

The targets and actions for each are set out below.

### Targets

The targets for each are set out below.

1. Achieve a waste recycling rate of at least 70% by 2030;
2. Achieve a municipal waste recycling rate of 55% by 2025;
3. Achieve a municipal waste recycling rate of 60% by 2030;
4. Achieve a municipal waste recycling rate of 65% by 2035; and
5. Achieve a 10% cap on the amount of waste going to landfill by 2035.

### Actions

To increase NHM recycling rates, DAERA commits to the following:

#### *Communications and behaviour change*

- 16) By the end of March 2027, to deliver a targeted national campaign to raise awareness in advance of the introduction of any new workplace recycling practices.

#### *Guidance and support to businesses and workplaces*

- 17) Work with councils and service providers to develop a minimum service standard for non-household waste and recycling services by the end of March 2027.
- 18) Develop guidance, tools and resources to support workplaces to implement effective recycling practices by the end of December 2027.
- 19) Work with Invest NI, trade bodies, councils and other stakeholders to ensure businesses are aware of the requirements and the support available to them.

#### *Regulation and policy development*

- 20) Undertake a review of the Food Waste Regulations (Northern Ireland) 2015 with a view to extending the scope to all businesses by the end of December 2022.

- 21) Develop regulations requiring businesses and other non-household organisations to present a consistent core list of materials for recycling. The core list of materials will mirror the core list of materials collected by household waste and recycling services to achieve consistency across sectors by the end of December 2028.
- 22) Progress actions to reduce or eliminate the disposal of NHM biodegradable waste to landfill by the end of December 2027.
- 23) Review, with councils, the potential for household recycling centres (HRCs) to be adapted to accept, measure and monitor non-household waste and recycling by the end of December 2029.

**Data, performance targets and reporting**

- 24) Through waste composition analysis, establish overall and sectoral baseline non-household waste compositions and arisings by the end of June 2027.
- 25) Establish a reporting framework to capture non-household waste and recycling performance data, including end destinations for materials by the end of March 2027.

**Question 10: Do you support the following actions set out for non-household municipal waste in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Communications and behaviour change</b>				
Action 16 in relation to communications and behaviour change relating to non-household municipal waste	Yes, support			
<b>Guidance and support to businesses and workplaces</b>				
Actions 17 to 19 in relation to the provision of guidance and support to business and workplaces in relation to non-household municipal waste recycling and best practice	Yes, support			
<b>Regulation and policy development</b>				
Actions 20 to 23 in relation to the development of policy and regulation pertaining to non-household municipal waste	Yes, support			
<b>Data, performance targets and reporting</b>				
Actions 24 and 25 relating to data, performance targets and reporting of non-household municipal waste	Yes, support			

We agree in principle.

We note that there is a lack of awareness around the existence and requirement of business recycling. This may be caused by several factors such as language barriers, scale etc. There would need to be multilingual support for communication campaigns on the self-assessment, and a capacity assessment tool would assist in this regard. Micro businesses in particular would benefit from such an approach. This is compounded by the lack of adherence to regulations and not being adequately monitored or enforced (e.g. Food Waste Regulations)

There are also resource implications for councils -potential to result in increased business waste enquiries contacting councils as the first point of contact. The approach needs to be sequenced correctly, with any discussions on service standards planned and agreed with Local Authorities in advance of campaigning and roll out of guidance.

Actions 20 & 21. We recommend enforcing current legislation rather than increasing the scope. There are significant implications in terms of costs, additional resources, and accessibility. This could impact on existing council service schedules and resources.

In order to meet the proposed targets, an extension of recycling obligations to non-household municipal waste will be necessary and consideration needs to be given to the unintended consequences of these actions, e.g. potential fly-tipping.

Councils already provide information under Waste DataFlow - we would welcome that it be expanded to include third party commercial operators.

In relation to Q23. there is the potential to breach licensing capacity requirements and impact on recycling rate/targets. Furthermore, the infrastructure does not currently exist on our sites e.g. weighbridges to capture and charge for commercial waste and the design of current sites may not easily facilitate this approach.

It is imperative that the non-household waste & commercial sector contributes proportionately to the municipal waste targets and that the desired improvements in recycling rates are not sole preserve of the household sector.

## Commercial and industrial waste

Robust data on commercial and industrial waste arisings is not on a par with household and non-household municipal waste data due to the lack of mandatory reporting.

The Climate Change Act (Northern Ireland) 2022 incorporates several requirements for the decarbonisation of the waste sector. It is important to note that the 70% recycling target in this Act potentially relates to all waste generated in Northern Ireland, not specifically commercial and industrial waste.

The target and actions for this waste stream are set out below.

### Targets

1. Achieve a waste recycling rate of at least 70% by 2030.

### Actions

DAERA commits to the following:

#### *Obtaining improved data on C&I waste*

- 26) For industrial sectors outside the scope of NHM waste, gather baseline data on C&I arisings, composition and recycling performance by the end of June 2027.

#### *Providing guidance and support tools for businesses*

- 27) Work with Invest NI and business sector groups to maintain awareness of the technical advisory support available to businesses and organisations in scope of future industrial recycling targets.

**Question 11: Do you support the following actions set out for commercial and industrial waste in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Obtaining improved data on C&amp;I waste</b>				
Action 26 proposed to increase recycling by obtaining improved data on C&I waste.	Yes, support			
<b>Providing guidance and support tools for businesses</b>				
Action 27 proposed to provide guidance and support tools to producers of commercial and industrial waste.	Yes, support			

## Construction and demolition waste

The Climate Change Act (Northern Ireland) 2022 incorporates several requirements for the decarbonisation of the waste sector. It is important to note that the 70% recycling target in this Act potentially relates to all waste generated in Northern Ireland, not specifically construction and demolition waste.

Under the revised [Waste Framework Directive](#), C&D waste is a priority waste stream. It sets the following objectives:

- Promote selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials and to ensure the establishment of sorting systems for construction and demolition waste at least for wood, mineral fractions (concrete, bricks, tiles and ceramics, stones), metal, glass, plastic and plaster.
- Reduce waste generation in processes related to industrial production, extraction of minerals, manufacturing, construction and demolition, taking into account best available techniques.

The targets and actions for this waste stream are set out below.

### Targets

1. Achieve a waste recycling rate of at least 70% by 2030.

### Actions

#### *Increasing and improving C&D waste treatment*

To increase and improve C&D waste treatment, DAERA commits to the following:

- 28) Undertake a review of C&D waste data to identify improvements in how it is captured, the treatment routes utilised and the overall composition of C&D waste to identify reduction, reuse, recycling and recovery opportunities by the end of June 2027.
- 29) Based on these data improvements, develop a baseline for C&D waste arisings and current reuse, recycling and recovery rates by the end of June 2027.

**Question 12: Do you agree with the following actions proposing to improve construction and demolition waste recycling and diversion from landfill and ensuring better data collection in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Construction and demolition waste</b>				
Actions 28 and 29 proposed to improve construction and demolition waste recycling and diversion from landfills and ensure better data collection.				Action 28 - We agree a review is welcomed and feel it is relevant to the draft circular economy document. Carbon impact of these materials is significant and agree this data is needed.  Action 29 – Yes, support

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## Hazardous waste

Hazardous wastes are those that are deemed dangerous to human health or the environment and are difficult to handle. Hazardous waste is being generated by households and across multiple industrial sectors, and there is scope to reduce the amount through targeted waste prevention programmes.

The Climate Change Act (Northern Ireland) 2022 incorporates several requirements for the decarbonisation of the waste sector. It is important to note that the 70% recycling target in this Act potentially relates to all waste generated in Northern Ireland, not specifically hazardous waste.

The target and actions for this waste stream are set out below.

### Targets

1. Achieve a waste recycling rate of at least 70% by 2030.

### Actions

To reduce the use of and exposure to hazardous substances, and to increase the reuse, recycling and correct handling of hazardous wastes in Northern Ireland, DAERA commits to:

- 30) Continue to monitor the issues of persistent organic pollutants (POPs) in waste and engage with and update stakeholders on their legal requirements and any other issues arising.
- 31) Ensure all sites accepting hazardous waste codes have been fully trained in Technical Guidance WM3.
- 32) In collaboration with industry, the third sector and councils, build on existing schemes to establish widespread collection platforms via HRCs for surplus paint from household and commercial waste streams by the end of December 2027.
- 33) Undertake effective regulation of the movement and management of hazardous waste.
- 34) Eliminate the use of Polychlorinated Biphenyls (PCBs) by the end of December 2025, in line with commitments under the Stockholm Convention.

**Question 13: Do you agree with the following actions proposing to increase the reuse, recycling and correct handling of hazardous wastes in Northern Ireland, in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

We broadly agree and support these actions.

We would like to see the introduction of clear and proportionate guidance on Persistent Organic Pollutants (POPs) in Northern Ireland, similar to those issued across the rest of the UK.

The segregation of this waste will be required, having implications on the amount, size and available space to separate and store POPs as needed. The resources and viable sites to permit incineration and shredding of POPs is also limited. The Strategy should explicitly recognise this distinction and support clear public and commercial guidance on segregation requirements.

We welcome the reuse and separation of paint from households (at Household Recycling Centres) but not (currently) commercial premises. This has potentially significant cost/resource implications which could eventually burden rate-payers. Ultimately the accountability needs to remain with the waste producer.

In line with commitments under the Stockholm Convention, we support the action to eliminate polychlorinated biphenyls (PCBs.) However, we are conscious of the timeline indicated and whether it is achievable. The manufacturers should lead on eliminating PCB's. There is concern over enforcement and who will have the authority to implement or make these actions happen. We also note the lack of measurable outcomes or metrics to support actions.

The council notes that DAERA “Undertake effective regulation of the movement and management of hazardous waste” and welcomes this commitment to ensure that sites containing hazardous waste likely to impact on human health and the environment are effectively managed through regulation and where necessary timely enforcement.

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Hazardous waste</b>				
Actions 30 to 34 proposed to reduce the use of and exposure to hazardous substances, and to increase the reuse, recycling and correct handling of hazardous wastes in Northern Ireland	Action 30- Yes Action 31- Yes, site staff should be OCC trained; any additional training will have resource and cost implications which should be factored into any final decisions. Action 32-Yes, not with commercial paint but there is scope for community reuse of household paint Action 33-Yes, though mechanisms and approach would need to be detailed Action 34- Has this been achieved? How is it enforced tracked and monitored?			

## Agricultural waste

Given the large agricultural sector tonnage generated in Northern Ireland and the high concentration of both organic and plastic waste within the arisings, there appears to be great potential for the sector to contribute to the 70% recycling target, if deemed within scope of the definition.

The Climate Change Act (Northern Ireland) 2022 incorporates several requirements for the decarbonisation of the waste sector. It is important to note that the 70% recycling target in this Act potentially relates to all waste generated in Northern Ireland, not specifically agricultural waste.

The targets and actions for this waste stream are set out below.

### Targets

1. Achieve a waste recycling rate of at least 70% by 2030.

### Actions

#### *Support farmers move up the waste hierarchy and improve recycling of waste materials.*

- 35) Work with key stakeholders to improve information on waste arisings in the agricultural sector by the end of December 2028.
- 36) Work with stakeholders to establish and celebrate the good resource and waste management practice already in existence in the agricultural sector in Northern Ireland and provide new support tools and guidance to enable the sector to manage waste more effectively by the end of December 2028.
- 37) Review existing data sources, opportunities to improve data capture and options to share information useful for the sector to improve performance by the end of December 2028.

**Question 14: Do you agree with the following actions proposing to increase recycling of materials arising from the agricultural sector in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Agricultural waste</b>				
Actions 35 to 37 proposed to increase recycling of materials arising from the agricultural sector	No opinion			

## Litter and fly-tipping

Litter causes negative local environmental impacts, is unsightly and costs local ratepayers money to be removed. Fly tipping is generally defined as the illegal dumping of rubbish or bulky items on land without a licence or permit to accept waste. It pollutes the land and waterways and can be dangerous to human and animal health.

The Climate Change Act (Northern Ireland) 2022 incorporates several requirements for the decarbonisation of the waste sector. It is important to note that the 70% recycling target in this Act potentially relates to all waste generated in Northern Ireland, not specifically litter and fly-tipping. The targets and actions for this waste stream are set out below.

### Targets

6. DAERA will continue to tackle the problem of littering and will continue to work with stakeholders to advance our anti-litter agenda including the introduction of bans or levies on certain materials.

### Actions

DAERA commits to the following:

#### Litter

- 38) Legislate for beverage containers and bottles to have lids and caps that will remain attached (tethered) to reduce commonly littered bottle caps by the end of December 2026.
- 39) Prepare regulations to restrict the sale or supply of ten commonly littered single-use plastic items by the end of December 2026.
- 40) Prepare regulations to implement clearer labelling of products that contain single use plastic to allow customers to make informed choices by the end of December 2026.
- 41) Prepare regulations to set a requirement for 25% average recycled content in PET bottles by 2025 and 30% average recycled content in all beverage bottles by 2030 to reduce the amount of virgin plastic that is used in manufacture by the end of December 2026.
- 42) Prepare regulations to restrict the supply and sale of wet wipes containing plastic to help tackle plastic & micro-plastic pollution by the end of December 2025.
- 43) Develop a proposal for a consumption reduction plan and targets for single use plastic takeaway cups and food containers to reduce unnecessary waste and tackle plastic pollution by the end of December 2026.

### *Fly-tipping and Illegal Waste Disposal*

- 44) Work to implement a consistent approach to data collection across Northern Ireland regarding fly-tipping and illegal waste disposal.
- 45) Aim to sign up all district councils to the Fly-Tipping Protocol by the end of March 2026.
- 46) We will continue to collaborate with the voluntary producer responsibility scheme for chewing gum.

### **Question 15: Do you agree with the following actions proposed to reduce litter and fly-tipping in the draft Resources and Waste Management Strategy?**

We agree with these actions and alignment with the EU Single Use Plastics Directive.

More detailed information is required, on who will enforce this legislation at point of sale. Council does not have the resources, and any additional resources will need to be funded.

Thought should be given to unintended consequences replacing plastic items with alternatives (e.g. paper/fibre) which may lead to difficulty with waste clean ups.

Clear labelling may help customers make informed decisions, however, from an enforcement perspective, behaviour change, and public awareness campaigns are needed. Individuals who intentionally litter may not be influenced by labelling/single use plastic. Further clarification required on responsible enforcing authority for labelling requirements. Will compliance be monitored at point of manufacture or sale? There may be challenges for reprocessors – e.g. lids may be of a different polymer type (e.g. HDPE/PP) compared to the bottle plastic (e.g. PET) Different types of plastic may need to be separated during the processing stage. This could lead to increased costs for councils. We would encourage ongoing engagement with reprocessors and material recovery operators. This needs to be enforced at manufacture stage and as such industry may be better placed to respond to this proposal.

From a council perspective, an increase in demand for recycled plastics could potentially improve markets and the quality of collected PET could become more valuable. The EPR scheme incentivises producers however the DRS approach will potentially leave council with reduced recycling tonnages.

Environmental Protection (Wet Wipes Containing Plastic) Regulation (Northern Ireland) was introduced on 18th November 2025, with an 18-month transition period (to May 2027). We welcome the proposals as they aim to reduce plastic pollution and protect sewage systems and waterways.

The consumption reduction plan will prevent littering caused by take away/food/café outlets. Guidance with details on how/who will enforce and ensure compliance with local retail premises is needed. This also supports the Circular Economy and Waste Reduction, tying in with the Single Use Plastics (EU) Directive – NI to reduce the consumption of SUP cups and food containers by 2026.

In establishing a framework for fly-tipping we welcome the plans, providing they:

- Improve data quality and comparability between councils.
- Support policy making and enforcement as well as resource allocation (if any) at regional and local levels.
- Enable targeted interventions and better evaluation of waste crime reduction measures.

Staff training may be required to ensure consistent reporting of incident types, locations, volumes and enforcement outcomes, having potential resource implications on council. We would agree that it would be beneficial to get all remaining councils signed up as better co-ordination is essential for tackling waste crime. Overall, we welcome the continued collaboration with the VPR scheme and recognise significant financial burden associated with gum related litter and street cleaning. We note the value of producer funded clean-ups and behaviour change initiatives. But we emphasize the importance of ensuring the long-term sustainability, adequacy and consistency of funding under voluntary arrangements and would highlight that statutory producer responsibility mechanisms may promote greater certainty for future planning.

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Litter</b>				
Actions 38 to 43 propose to reduce litter	Yes - support			
<b>Fly-tipping and Illegal Waste Disposal</b>				
Actions 44 to 46 propose to reduce fly-tipping	Yes – Support			

## Overall

**Question 16: Do you agree that the draft Resources and Waste Management Strategy covers the main issues and key considerations for all seven waste streams detailed in Part 2?**

- Agree

Generally, agree.

However, we would highlight that it is disappointing that there are no clear targets (e.g. recycling targets) for the litter and fly-tipping category, detailed in Part 2.

We would also suggest that batteries could be a standalone, separate waste stream in their own right (rather than being included in the hazardous waste category) and standalone reference could be given to clinical waste too.

In addition, we would ask - how will domestic infrastructure be funded and developed in a timely manner to ensure that materials collected can be recycled (not just collected and sorted), and decrease reliance on export markets or energy recovery as a solution?

Local authorities already risk facing additional costs for disposal as a result of changes to the Emissions Trading Scheme (ETS) and failing to develop adequate and appropriate recycling infrastructure for materials that do not currently have recycling solutions at scale increases the risk of these costs further.

## Part 3: Making It Happen

Part 3, Making it Happen, Discusses the necessary conditions for effective resource management, including infrastructure, collaboration, communication, research, and enforcement.

This part of the strategy covers five areas of action to deliver the strategy and build on the waste stream specific actions.

- Infrastructure and Capacity
- Working Together to Achieve Shared Goals
- Communication and Engagement
- Research, Innovation and Skills for the Future
- Enforcement

National reviews show that Northern Ireland does not have sufficient capacity to process all the potentially available mixed recyclables from household and commercial sources, nor does it have the medium-term landfill capacity to dispose of residual waste. It is therefore important that we put additional focus on the other four areas within this section.

The multi-faceted nature of the waste sector means there is a diverse range of stakeholders and having due regard to the impact new policy and legislative decision making has on the sector is of key significance. Working together with the sector is the only way to achieve this.

### Infrastructure and capacity

Waste management infrastructure is needed to make sure that waste and recyclables generated are handled safely, managed and processed into new products. A robust infrastructure is needed to respond to the changing volume and composition of waste and ideally treated or disposed of within the region in which it is produced. Planning and development decisions must be based on robust and up to date data and are evidence based.

#### Actions

##### *Enabling improved waste infrastructure capacity*

- 47) DAERA will respond to all input requests that are submitted to DAERA for planning of waste infrastructure.
- 48) To continue to monitor non-hazardous landfill capacity and continue to assess the level of permitted and planned landfill infrastructure.
- 49) Engage with each of the three local council waste management groups to identify how their waste management plans may need to be updated regarding waste management infrastructure by the end of April 2027.

**Question 17: Do you agree with the following actions relating to waste infrastructure and capacity in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Infrastructure and capacity</b>				
Actions 47 to 49 proposed in relation to infrastructure and capacity	Yes, support			

NI does not have the required domestic capacity to deal with all of its waste arisings. NI only has one large scale, operational Energy from Waste (EFW) plant with most of the residual waste now being exported for energy recovery.

From a Planning perspective, the Council supports the three recommended actions aimed at improving waste infrastructure capacity. As outlined in section 3.2.3 of the draft Strategy, councils must ensure their Local Development Plans (LDPs) align with the SPPS's regional waste management objectives. Belfast's Plan Strategy (PS), adopted in May 2023 following Independent Examination, provides the operational planning framework for waste infrastructure through policies W1–W5. These policies closely reflect DfI's PPS 11, which no longer applies in Belfast following adoption of the PS.

The Council is now preparing the second LDP document, the Local Policies Plan (LPP). The SPPS (2nd Edition) requires councils to assess future waste management facility needs and identify specific sites where necessary. Engagement with stakeholders in May 2025, including arc21 and BCC, concluded that there is currently no requirement to identify specific waste management sites within the Belfast City Council area.

Waste management stakeholders are fully aware of the growth ambitions set out in the Community Plan and LDP, including projected increases between 2020–2035 of 66,000 residents, 46,000 jobs, 31,600 homes, and 550,000m<sup>2</sup> of employment floorspace. Given that the existing Waste Management Plan (WMP) dates from 2015, it is essential that any updated WMP aligns with and supports these growth objectives. An up-to-date Resources and Waste Management Strategy (WMS) and Consistent Collections/Simpler Recycling document will be welcomed, as both documents are important material considerations when assessing planning applications for waste facilities, particularly in establishing need.

DAERA responding to planning input requests - The current system, where DAERA's Planning Response Team coordinates consultation responses on waste-related planning applications, works effectively.

Monitoring non-hazardous landfill capacity - This is a reasonable approach. While the LDP aims to reduce reliance on landfill, such development is not prohibited. Policy W3 sets out criteria for assessing landfill proposals, including demonstrating need through the WMS and WMP, alongside environmental and transport considerations.

Engagement with council waste management groups by April 2027 -The Council supports this action, given the importance of the Waste Management Strategy and Waste Management Plan in informing planning decisions on waste infrastructure. We welcome engagement with the regional waste management groups to review and update waste management plans. The council recognises the importance of ensuring that infrastructure planning remains aligned with evolving waste arisings, policy targets and market conditions.

BCC notes that any plan update should carefully consider existing contractual arrangements, infrastructure investments and system resilience.

## Working Together to Achieve Shared Goals

The resource and waste sector is a multi-layered and multi-dimensional sector with a significant number of stakeholders.

The roles and responsibilities assigned to the various parties in the resource and waste sector in Northern Ireland will support a number of the targets outlined in this strategy.

This strategy sets out **a call to action for collective responsibility**, and over the lifetime of this strategy, we aim to enable all players in the sector to work collaboratively to support the implementation of the actions detailed in this strategy, this will involve **collaboration between Government, industry and wider stakeholders**. There are no specific actions under this section of the strategy, but DAERA are interested in your views in relation to the **list of proposed stakeholders, partners and sectors**:

- Northern Ireland Environment Agency (NIEA)
- Department for the Economy
- Northern Ireland's councils
- Council waste management groups
- Waste management companies
- Reprocessors
- Communities
- Representative Body / Member Organisations and Trade Bodies
- Business and industry
- The agricultural sector
- The construction and demolition sector
- Environmental organisations and NGOs
- Research and Development
- Education
- Healthcare

**Question 18: The Department envisages working with the stakeholders, partners and sectors listed above. Are there any additional stakeholders, partners and sectors that should be included?**

Other statutory organisations/government and government representative bodies which should be considered:

DFI  
NI Water (re: wastewater treatment issues/ blocked sewers etc.)  
LARAC  
WRAP  
PSNI (re waste crime, organised illegal dumping and cross border waste movement.)  
EPA - Ireland (re Transfrontier shipment of waste, shared recycling markets, policy alignment, Windsor Agreement etc.)  
Pack UK & Exchange for Change (re EPR and DRS)  
Infrastructure and Energy sector (e.g., energy companies, infrastructure investors, EFW operators.)  
Potentially - health and social care trusts  
NILGA (local government representation)  
Queens University & Ulster University.

## Communication and engagement

There are a diverse range of stakeholders across the waste sector and their ability to work together to support the delivery of new policy and be involved in legislative decision making is significant.

### Target

7. DAERA will continue to lead the development of multi-year, integrated Communications and Engagement for waste and recycling.

### Actions

To facilitate increased communications and engagement amongst all stakeholders and bring about behavioural change in relation to resources and waste DAERA will:

- 50) Continue to utilise behaviour change theory and interventions to generate necessary improvements in correct recycling from citizens at home and in the workplace.
- 51) Continue to communicate and engage with stakeholders in support of new policies and regulations through the Communications and Engagement Plan.
- 52) Support existing and new strategic partners in the delivery of communications and engagement activities, including coordinating messages and campaigns across government departments.
- 53) Continue to partner with external organisations, where appropriate, to deliver campaigns to engage the education sector and address target waste streams, global waste problems and littering.
- 54) Work to establish a Northern Ireland Business Recycling Advisory Group by the end of March 2026.
- 55) Work in partnership with Northern Ireland National Communications Action Plan (NCAP) to co-ordinate the delivery of national and local communication activities with Councils to improve the quality and quantity of household recycling, including changes to recycling services.

**Question 19: Do you agree with the following actions proposed to facilitate increased communications and engagement amongst all stakeholders in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Communications and engagement</b>				
Actions 50 to 55 proposed to facilitate increased communications and engagement amongst all stakeholders in relation to resources and waste	Yes – Support			

We agree with the proposed actions to strengthen communications and engagement and recognise the actions are critical to the successful delivery of the Resources and Waste Management Strategy.

**Action 50- Utilise behaviour change theory**

We agree there is a need for consistent messaging and support and welcome continued collaboration. We await the Collections Consistency guidance from DAERA, to assist in the messaging to residents and businesses.

**Action 51- Communications and Engagement Plan**

We query accessibility to the plan and how we can review it for further comment. What are the roles and responsibilities and alignment of the messaging within that plan? What is the framework for the plan, what are the proposals, actions and targets and also what are the resource implications for councils?

**Action 52 – Strategic Partners**

We support in principle, but the mechanism for how strategic partners will assist councils is unclear. The proposals feel vague and need more detail on delivery and accountability.

**Action 53 – External Organisations**

Clarification is needed on how groups such as Eco-Schools and Keep Northern Ireland Beautiful will be involved. There should be evaluation of links to the school curriculum and clearer expectations for public engagement.

**Action 54 – NI Business Recycling Advisory Group**

Welcomed, especially the stronger focus on business and commercial waste. Household waste has already been optimised significantly, so shifting attention to commercial waste is appropriate and necessary.

**Action 55 – NI NCAP**

Use of ACORN data and demographic targeting is positive. However, with EPR funding tied to performance, councils receiving reduced EPR payments despite best endeavors may need additional support.

## Research, Innovation and Skills for the Future

The shift from a linear to a circular economic model will inevitably drive changes in skill and training needs and will require many stakeholders' inputs to successfully deliver the changes required.

**Targets:** To play its part, DAERA will:

8. DAERA will continue to support updating skills and training needs to facilitate a shift to a more Circular Economy in Northern Ireland.
9. DAERA will work with Devolved Administrations to develop and implement the first phase of mandatory Digital Waste Tracking across the UK by October 2026.

**Actions:** To build a pathway towards improved skills and training, DAERA will:

- 56) Enable the skills related to resources and waste management, such as design, repair and refurbishment, necessary to transition to a resource-efficient and low-carbon economy. Work with other stakeholders to ensure this is also included in just transition planning.
- 57) Continue to support research and development of innovative technologies and solutions that will help improve the waste management sector in Northern Ireland and the transition to a circular economy.
- 58) Provide funding to support third sector organisations to enable the updating of skills and training needs.

**Question 20: Do you agree with the following actions on skills, training and research required for the future in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Skills, training and research</b>				
Actions 56 to 58 proposed in relation to research, innovation and skills	Yes, support			

Agree in principle.

However, we note that the timeframes are very tight- e.g., food waste recycling and again the lack of metrics to quantify objectives is apparent. Therefore it is difficult to understand how these objectives will be measured and what level of success they achieve.

We would like to see details on how these points are being actioned and what the expectations are of councils?

We embrace using innovative approaches and technology, as long as they are balanced with carbon off setting and support service delivery for staff and service users.

We strongly support the commitment to coordinated engagement across government departments, councils, strategic partners and external organisations. We also agree that support is needed in third sector organisations as these organisations often play a key role in community engagement, education and the delivery of reuse and repair initiatives. We look forward to further clarification on this subject and opportunities for collaboration.

## Enforcement

Compliance with regulations is an important element in ensuring that we continue to maintain a safe and healthy environment in Northern Ireland. Protection and enhancement of Northern’s Ireland’s environment is integral to this strategy and supporting compliance with local and international legislation and standards and using effective and consistent enforcement are central to those priorities.

### Targets

10. DAERA will continue to develop a greater understanding of Serious and Organised Crime’s involvement in environmental crime, to enhance capabilities in tackling this issue.

### Actions

To address these challenges, DAERA commits to:

- 59) Introduce a single Incident Management System which will assist in centralising data capture/incident management across a range of business areas (including illegal waste activity) by the end of March 2026.
- 60) Seek to ensure that all newly obligated subsectors are aware of their respective responsibilities. This will improve effective enforcement.
- 61) Increase capacity and capability to receive, assess, develop and disseminate intelligence. Ongoing. Will continue for lifetime of the Strategy.
- 62) Develop our understanding of Organised Crime Groups and crime types to ensure we deploy our resources where we will have the highest impact. Ongoing. Will continue for lifetime of the Strategy.
- 63) Develop partnership working to deliver disruption and enforcement interventions. Ongoing. Will continue for lifetime of the Strategy.

**Question 21: Do you agree with the following actions proposing to improve compliance and enforcement in the draft Resources and Waste Management Strategy? If your answer is no, please explain why.**

Actions	Yes, support	No, do not support	No opinion	If no, why?
<b>Enforcement</b>				
Actions 59 to 63 proposed to improve compliance and enforcement	Yes, broadly support			

Action 59- Incident Management System: Is this a system for DAERA only or is it an accessible system that Councils can input into? Councils have their own systems, and existing approach would be to email a referral to NIEA. Will this new system allow collaboration with existing reporting structures?

Will the system be integrated into an existing system? Will it be only for large scale /hazardous incidents? NIEA identify small to medium scale fly tipping as under 20m cubed using volume rather than type. Will the new system factor these parameters, and will there be cross organisation alignment?

Council is open to accessing a system that enables a better joint-up approach, which ensures better organisation and effective management of incidents.

The current stage of development and implementation of this system is needed. Also training on using the system will be required, as well as any GDPR data sharing considerations outlined.

We note an announcement at the end of March on council powers to deal with fly-tippers:  
<https://www.circularonline.co.uk/news/new-council-powers-can-force-fly-tippers-to-clear-dumped-waste/>

Action 60 - We welcome this and are keen to understand and have the subsectors identified. We would appreciate more detail on the planned approach and how will this be actioned- what is the mechanism to ensure responsibilities are outlined and how will it be enforced?

Action 61- Again, this statement fails to outline the detail on resourcing and how it's going to be delivered. We are keen to understand what the increase in capacity is and what's not working – perhaps an approach that measures and produces metrics to understand how information is received, assessed and developed into useful intelligence. Greater clarity required.

Action 62 - Support in principle.

Action 63 - Partnership with council is welcomed, we would request an outline and clarity on roles and responsibilities and any resource implications that may occur from this. Will there be a partnership framework and what is the planned approach to governance? We welcome the approach but believe more information is needed, to gauge an understanding of how success and outcomes are to be measured.

## Part 4: Monitoring Progress

The aims, actions and targets set out in this strategy represent an ambitious new vision for the future of waste management. To deliver this we recognise that DAERA has a key role in providing strong leadership, both in terms of driving progress through our own commitments but also, where required, bringing stakeholders and key players together in pursuit of a greater vision. Supporting governance structures, alongside clear performance indicators and baselines, is vital to ensure the required changes are delivered and appropriate monitoring and evaluation can be carried out to measure our progress over the life of the strategy.

Looking beyond Northern Ireland, it is imperative we work with other UK nations and Republic of Ireland to join up policy so that we can achieve shared goals. This includes continuing participation in relevant forums, such as the Resources and Waste Common Framework and the North/South Ministerial Council, as well as regular engagement at official level.

Alongside the high-level indicators, individual targets and actions set out in the strategy will be monitored, totaling 10 targets and 63 actions covering waste prevention; recycling; other recovery; disposal; better regulation and enforcement, and communication and engagement.

A fundamental part of monitoring will be regular reporting on progress against each action and target. DAERA will produce a report midway through the 6-year period of this strategy to update on progress. A final review and report will be completed following the end of the 6-year period. There are no specific actions under this section of the strategy, but DAERA are interested in your views in relation to the following question.

**Question 22: Do you agree with the approach described in Section 4 of the draft Resources and Waste Management Strategy to monitoring and evaluation? Disagree**

A commitment to report progress against actions and to undertake a mid-term and final review is positive. We believe further details are needed on who will be inputting into or capturing this information.

The following areas require further clarification and strengthening:

- Monitoring framework methodology with further details on:
  - o What data will be collected to assess performance
  - o How indicators and targets will be measured and validated
  - o Whether consistent methodologies will be applied across all actions and outcomes

We feel the proposed approach of a mid-term report and a final review over a six-year period is insufficient. We would encourage more frequent (annual) reporting. This would enable earlier identification of issues or under performance, support timely intervention and corrective action and also improve transparency and accountability.

The reference to Digital Waste Tracking is noted. However, further clarification required on:

- How digital systems will support monitoring and evaluation
- Whether data will be integrated across different sources and organisations
- How data quality and consistency will be ensured

This section also refers to working with the sector. Clarification is sought on:

- Which stakeholders will be involved (e.g. LAs, industry etc.)
- How these stakeholders will contribute to monitoring and evaluation
- Whether there will be formal mechanisms for ongoing engagement and feedback.

There is limited detail on how monitoring will drive accountability and improvement. Monitoring should not be limited on reporting progress; it should actively support continuous improvement. It could also be linked to decision making processes and resource allocation.

## Part 5: Supporting Documentation

The Waste and Contaminated Land (Northern Ireland) Order 1997 (WCLO) places a statutory obligation on DAERA to produce a waste management plan and revise it every sixth year. The legislation also sets out that the overall objective of the plan must be protecting the environment and human health by preventing or reducing the generation of waste and the adverse impacts of the generation and management of waste, and by reducing overall impacts of resource use and improving resource efficiency.

### Waste and Contaminated Land (NI) Order 1997 Requirements (WCLO)

**Question 23: Referring to Appendix 3b of the draft Resources and Waste Management Strategy, do you agree the Waste and Contaminated Land (NI) Order 1997 requirements for a waste management plan are sufficiently addressed throughout the strategy?**

- Agree

The strategy appears to broadly acknowledge the statutory requirements of the W&CLO. However, it does not provide full clarity on how some requirements will be operationalized or monitored. As per our previous answers, although the strategy outlines high level objectives and commitments, it lacks detail and substance.

DAERA has demonstrated awareness of each requirement including policies, consultation, surveys, conformity with broader plans and integration with LA plans as well as optional requirements – such as the surveys and investigations in 5b. These requirements are being actively addressed with planned updates – however, DAERA could better clarify how these will be incorporated once results become available.

With reference to the surveys commissioned to assess waste arisings and waste composition – this is most welcome, considering the previous analysis was conducted almost a decade ago and the nature of waste streams may have changed significantly over this time period. We note that in addition to an updated datasheet in respect to Municipal Waste, Commercial and Industrial Wastes and Construction, Demolition and Excavation Wastes will also be included within this study.

With regards to the proposals within the current Consultation, to include additional waste streams such as Hazardous Waste, Agricultural Waste and Litter and Fly-Tipping Waste, would compositional surveys be extended to include these waste streams?

Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) are essential tools in ensuring that plans, programmes, and projects are developed in a way that safeguards the environment and protects biodiversity.

SEA is a systematic process used to evaluate the likely significant environmental effects of proposed strategies, plans, or programmes before they are adopted. It ensures that environmental considerations are integrated at an early stage of decision-making, supporting sustainable development and compliance with environmental legislation. SEA is a requirement of the Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2024 legislation and the Environmental Report is the final output of the SEA process.

The HRA is a legal requirement under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995. for any plan or project that could have significant effects on protected sites, such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). It assesses whether proposals could adversely affect the integrity of these designated sites and ensures that adequate measures are in place to avoid or mitigate harm.

Together, SEA and HRA provide a structured framework for balancing development needs with environmental protection, ensuring that decision-makers have the information necessary to make informed, legally compliant, and sustainable choices.

#### Strategic Environmental Assessment (SEA)

**Question 24: Do you agree with the conclusions of the Environmental Report, assessing the potential impact of the draft Resources and Waste Management Strategy on the Northern Ireland environment?**

- Agree

The conclusions of the Environment Report (ER) are broadly supported in principle. However, there are a number of important limitations within the report which should be acknowledged.

For example, many of the positive environmental effects identified are conditional on the successful implementation of the strategy. The ER assumes the key actions, targets and infrastructure developments, as well as behavioural changes will be delivered as intended. However, these are not guaranteed.

The strategy is high level in nature and does not provide the detail or data required to enable a fully robust assessment of environmental impacts. In particular, the lack of detail regarding the location, scale and timing of future infrastructure means that certain impacts are identified as uncertain. Whilst this is consistent with the strategic nature of the document, it limits the extent to which significant effects can be fully evaluated at this stage.

Also, the report places considerable reliance on mitigation through existing regulatory frameworks, including planning and environmental permitting processes. The ER does not appear to fully consider the practical constraints associated with the delivery of waste infrastructure.

In Northern Ireland, delays and challenges within the planning system have the potential to significantly impact the timely development of required facilities. The ER does not meaningfully address issues such as planning delays or systemic barriers to infrastructure delivery. It assumes that infrastructure will be delivered and that planning and permitting will function effectively. It does not adequately address the risk that infrastructure could be delayed or denied. Final note, there is limited data provided on how environmental outcomes will be monitored over time.

## Habitats Regulation Assessment (HRA)

### Question 25: Do you agree with the conclusions of the Habitats Regulations Assessment of the draft Resources and Waste Management Strategy?

- Agree

Is noted that:

*“The Resources and Waste Management Strategy for Northern Ireland, as assessed, and with consideration of the mitigation measures set out for developments resulting from the strategy, will not adversely affect the integrity of any Natura 2000 site. The assessment of actions in the Resources and Waste Management Strategy is high level, evidence-based and compliant with statutory requirements and is therefore suitable for submission alongside the Resources and Waste Management Strategy. The assessment has identified potential impact pathways but concludes that these can be effectively managed through comprehensive policy-level safeguards within environmental and planning policy that supports the strategy; mandatory project-level assessments and mitigation; robust monitoring and adaptive management systems; effective coordination with other plans and projects.”*

The HRA concludes that the draft strategy will not adversely affect the integrity of Natura 2000 sites, subject mitigation measure and the application of relevant regulatory controls. However, there are a number of limitations to the conclusions drawn – for example the HRA relies heavily on the assumption that potential impacts will be appropriately managed through existing planning, environmental assessment and regulatory processes. Whilst these safeguards are an essential part of the framework, the conclusions depend on their effective and consistent application.

The HRA does not fully explore the implications if these processes are delayed or constrained. Consideration must be given to the practical challenges associated with the delivery of waste infrastructure as well as recognition that the timely and appropriate development of such infrastructure is critical to achieving the objectives of this draft strategy.

Equality Screening is one of the key tools to enable public authorities to fulfil their statutory obligations and mainstream the Section 75 equality and good relations duties into policy development. It provides an opportunity to improve decision-making, support 'evidence based' policy making and can help improve a public authority's service provision through a systematic review of all services, policies, procedures, practices and/or decisions.

Public authorities must undertake a Rural Needs Impact Assessment when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. A Rural Needs Impact Assessment is a step-by-step process aimed at helping public authorities to ensure that the due regard duty imposed under section 1(1) of the Rural Needs Act (Northern Ireland) 2016 ('the Act') duty is fulfilled.

#### Equality Screening Assessment (EQ Screen)

#### Question 26: Do you agree with the conclusions of the Equality Screening Assessment of the draft Resources and Waste Management Strategy?

- Agree

There are a number of limitations within the screening:

- The conclusion of no significant impact appears to be based primarily on the high-level nature of the strategy rather than on a detailed assessment of how the proposed measures may affect different section 75 groups in practice. Whilst the strategy does not set out specific operational measures, it will influence future policy decisions service design and infrastructure development, all of which have the potential to result in differential impacts.

- In particular there is limited consideration of how the strategy may affect certain section 75 groups:

- **Disability** - changes to waste collections or systems, recycling requirements or services - accessibility issues may disproportionately impact individuals living with disabilities particularly where additional effort, mobility or understandings required to comply with new systems.

- **Age** - older people may face challenges in adapting to changes in waste management practices particularly where these involve more complex sorting requirements or physical handling of waste. Similarly younger people may be affected, depending on educational and awareness approaches.

- **Race and language** - individuals whose first language is not English may face barriers and understanding new requirements guidance or communications relating to waste management without clear and accessible information. This could impact levels of compliance and participation,

- **Dependents** - households with caring responsibilities may experience additional pressures in adapting to changes with systems particularly where these require increased time, storage space or management of multiple waste streams.

- While **social economic status** is not a section 75 category it is also relevant to note that changes in waste policy can have indirect impacts in lower income households for example through costs associated with compliance, access to services and the practicalities of managing waste. Individuals who are "digitally excluded" should also factor into this.

The screening indicates that equality considerations will be addressed at a later stage of implementation. However, there is limited detail on how this will be achieved in practice including how impacts will be identified monitored and mitigated as policies and services are developed.

In conclusion whilst the screening process has been undertaken appropriately, and the overall conclusion is reasonable in principle; it would benefit for a more detailed exploration of potential differential impacts across section 75 groups. Greater clarity on how equality considerations will be embedded throughout implementation, including ongoing assessment and engagement would strengthen confidence that the strategy will be delivered in an inclusive and equitable manner.

**Rural Needs Impact Assessment (RNIA)**

**Question 27: Do you agree with the conclusions of the Rural Needs Impact Assessment of the draft Resources and Waste Management Strategy?**

- Agree

The conclusions of the Rural Needs Impact Assessment are broadly supported in principle.

It is reasonable that given the high level and strategic nature of the draft Resources and Waste Management Strategy, that the assessment concludes that there are unlikely to be significant adverse impacts on rural communities at this stage.

We note that it will likely be up to each local authority to consider how rural needs assessments are undertaken, with regards to waste service provision, (addressing how parity of service provision is maintained ensuring no unintentional disadvantage to rural service users.)

We would highlight section 2.6 of the Strategy (on Agricultural Waste) and suggest that adequate engagement is conducted with the Agricultural Sector in Northern Ireland to ensure that Rural Needs are addressed appropriately with regards to the draft strategy.

## Part 6: How To Respond

This consultation will run for **12 weeks**, opening on **15th of January 2026** and closing at **23:59 on 6<sup>th</sup> May 2026**.

Responses to this consultation are to be completed online at the following link:

<https://www.daera-ni.gov.uk/consultations/rethinking-our-resources-northern-ireland-resources-and-waste-management-strategy>

### What we will do with your responses

When the consultation has closed, we will analyse your responses. Once analysed we will use these to publish a final Resources and Waste Management Strategy.

DRAFT

## ANNEX 1 Publication of Responses

### Confidentiality

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 as these provide guidance on the legal position of any information given by you in response to this consultation. Any confidentiality disclaimer generated by your IT system in e-mail responses will not be treated as such a request.

### Data Protection

Section 8 (e) of the Data Protection Act 2018 permits processing of personal data when necessary for an activity that supports or promotes democratic engagement. Information provided by respondents to this consultation exercise will be held and used for the purposes of the administration of this current exercise and subsequently disposed of in accordance with the provisions of the Data Protection Act 2018 and General Data Protection Regulation.

### Freedom of Information

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 right of access to information includes information provided in response to a consultation. The Department cannot automatically consider information supplied to it as confidential in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity, should be made public or treated as confidential. This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances.

The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- The Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature;
- Acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses, please contact the Information Commissioner's Office: Telephone: 0303 123 1113

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk) Website: <https://ico.org.uk>

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

Email: [wastepolicyteam@daera-ni.gov.uk](mailto:wastepolicyteam@daera-ni.gov.uk)



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

An Roinn

**Talmhaíochta, Comhshaoil  
agus Gnóthaí Tuaithe**

Department o'

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