

## **Belfast City Council DRAFT Response to the Waste Prevention Programme 2019 “Stopping Waste in its Tracks”**

Belfast City Council welcomes the opportunity to respond to DAERAs consultation on its proposed Waste Prevention Programme 2019.

It is noted that this programme is an interim measure designed to meet the legal requirements set out in the Waste Framework Directive and the Waste Regulations (Northern Ireland) 2011 and that it does not seek to introduce any new waste prevention policies. Our broad view of this light-touch approach is that an opportunity may have been missed by the Department, to develop a targeted waste prevention programme, with measurable results and prioritised actions, for Northern Ireland.

The measures within the Programme are positive. However, they generally appear quite broad and unfocused with little rationale and coherence behind them. A more strategic approach, linking in with regional planning, national and cross border contexts, SOLACE, The Environment Strategy, the Green New Deal and the Industrial Strategies (both UK and NI) could be considered within the Programme. Reference could also be given to the Stern report around the economics of climate change (it is worth noting that Belfast City Council has commissioned a Mini-Stern report, to include a full economic review and baseline for the city. The production of a full economic growth plan for the city is expected by autumn 2020). The Circular Economy also needs to be considered as part of the programme as this would provide many opportunities for councils, government, the third sector and industry to work together in their approach to waste management and to support economic growth, innovation and job creation across the province.

It is worth noting, that, from a council perspective, we are downstream of waste production and are limited to what we can do in relation to waste prevention. The Waste Prevention Programme needs to be integrated, collaborative and underpinned by an NI wide resourced strategy. Centrally, DAERA and other departments have a significant role to play in this.

The Department’s previous Waste Prevention Programme had monitoring and measurements built in to the model as demonstrations of success. However, it is disappointing that the current draft does not reference such indicators. Whilst it may prove difficult to quantify waste prevention measures, we would recommend that consideration is given, within this programme, to developing meaningful and measurable Key Performance Indicators. In addition, it is noted that there are no policies within the current draft referencing the further decoupling of economic growth from the generation of waste (such factors were detailed in the previous report). Another approach that the Department may wish to consider is Outcomes Based Accountability (OBA), in line with the Programme for Government.

Development of robust KPIs, along with prioritised actions and a strategic approach would provide the Programme with a more structured and focused framework. ‘In developing such KPI’s, we suggest that consideration should be given to ensuring consistency with broader systems-level thinking around suitable KPI’s for circular economies.’

To facilitate a strategic approach to waste prevention, and in the context of creating a circular economy, we recommend that DAERA commissions a large-scale study of the flows of materials in Northern Ireland to establish and map the whole picture of consumption, production & waste. Such a map would clearly identify the main issues in the system and, therefore, clarify what the priorities should be. As well as encouraging a systematic approach to waste prevention, this map would serve to facilitate NI’s transition to a circular economy.

The Circle Scan undertaken in Glasgow

(<https://circularglasgow.com/wp-content/uploads/2019/01/Glasgow-City-Scan.pdf> )

And a similar study in Amsterdam

(<https://www.circle-economy.com/insights/developing-a-roadmap-for-the-first-circular-city-amsterdam>) provided lots of useful information across water, energy and solid waste to inform the most impactful opportunities for those cities. (It is worth noting that the initial Glasgow study cost

£25k). Belfast City Council has already explored this concept by mapping consumption, production and waste in the NI Furniture industry. ONS is already exploring the viability of a similar approach nationally – in the form of a National Materials Database - and could be approached by DAERA with a view to focusing on Northern Ireland.

We also recommend that DAERA undertakes to identify and address where there are systemic barriers to reuse across industries and material streams (areas to be investigated) could well be identified and informed by or form part of the study of the materials flow within Northern Ireland outlined above). This may include public policy barriers (for example, it is often cheaper to demolish and rebuild a building than to repair or refurbish it - largely due to the fact that VAT is applied to materials for refurbishments but not for new builds). The current system, means that it might actually be cheaper to create waste than to avoid it. Economic instruments, existing across various industries, (designed possibly to create more manufacturing work), could actually mean that, by default, they create more products, consumption and waste. Consideration must be given to advocating VAT or other policy changes which would favour reuse / refilling and resource efficiency.

There may also be other barriers to address in terms of the ‘attractiveness’ of reusable items to potential users or buyers. We note that the programme does allude to this to some extent via the quality mark – but while that may help address buyers’ concerns about quality and reliability, other measures might be needed to address other perceptions and stigma around buying ‘second-hand’ items.

Finally, on a general note we would encourage DAERA to ensure that the Waste Prevention Plan is socially inclusive and that it provides opportunities to all, not only in terms of jobs creation, training and skills development within the waste and production industries but to everyone impacted by the policies contained within the strategy.

## **Consultation Questions.**

### **1. Extended Producer Responsibility**

**DAERA will continue to work in conjunction with the UK Government and the Devolved Administrations to design and implement an EPR scheme that is consistent with the polluter pays principle and which aims to reduce the amount of unnecessary and difficult to recycle packaging.**

BCC is broadly supportive of this. We would advocate that EPR schemes are further integrated into local recycling networks and that hard or expensive to recycle materials could be used to fund more environmentally friendly alternatives. (For example disposable nappies helping fund a scheme for reusable cloth nappies). We note that there could be a significant burden associated with administering such funding schemes and we would stress that resources for the impacts on local government are fully costed, resulting in minimal or no financial impact to rate payers.

## **2. Collaboration with Defra and Other DA's in Relation to Eco-Design**

**DAERA will collaborate with Defra and other devolved administrations to extend eco-design standards to a range of non-energy resource intensive product groups with the aim of preventing avoidable waste.**

BCC is broadly supportive of this concept but the information provided is light on detail, for example details on the types of products, a clear definition of "eco-design" and clarity on what is being measured.

## **3. Collaboration with Defra and other Devolved Administrations in Relation to Enhanced Eco- Labelling**

DAERA will collaborate with Defra and other Devolved Administrations to develop new mandatory consumer information and labelling aimed at conserving resources and preventing waste.

BCC is broadly supportive of this proposal as clearer standardised labelling would help with mass communication and consumer choice. However, we would caution that the scheme be fully thought through to avoid unintended consequences, such as dis-incentivising more eco-friendly products through incurring higher product costs.

Achieving a desirable status on products eco label could help be a driver for producer resource efficiency. We suggest that the concept goes beyond just a label and that producers are encouraged to stimulate real sustainable change.

We suggest that advice is sought from the food industry on lessons learned from experience of similar concepts (e.g. food labelling as well as the sugar tax). We would want to see the label provide information that customers can easily relate to and understand (as opposed to an abstract number which is not meaningful to the general public).

## **4. Tackling Plastics Project**

**DAERA will aim to reduce plastic waste through a number of mechanisms being delivered as part of the Tackling Plastics Project that Keep Northern Ireland Beautiful are undertaking on behalf of DAERA.**

BCC is broadly supportive of this action as it is another channel through which to raise the profile of waste prevention and to highlight the range of products out there, for example, single use plastics. However, a more coherent plastics strategy is required from DAERA, addressing designers, manufacturers, retailers and consumers.

## **5. Carrier Bag Levy**

**DAERA will continue to review the Carrier Bag Levy charging administration and if appropriate make changes to the charging regime.**

BCC notes that within Section 4.2.2 Carrier Bag Levy, DAERA has highlighted that a Single Use Carrier Bag Levy was introduced on 8th April 2013 through the Single Use Carrier Bag Levy Regulations (Northern Ireland) 2013.

These Regulations initially required retailers to apply a 5p charge for new carrier bags but were extended in January 2015 to apply to all carrier bags with a retail price of less than 20p. The overriding objective of the levy has therefore been to protect the environment and achieve significant reductions in the number of single use plastic bags circulating in Northern Ireland.

DAERA have highlighted that the Carrier bag Levy is now in its 6th year of operation and has generated over £19 million to date, with the proceeds used to deliver local projects to both enhance and improve the environment. DAERA have also highlighted that the funds have been disbursed via the Environment Fund to allow not-for-profit organisations and councils to deliver key environmental priorities across Northern Ireland.

As a consequence of the improvements funded via the carrier bag levy, DAERA have advised under Action 5 of the Waste Prevention Programme 2019 that the Department will continue to support the Carrier Bag Levy charging administration, to review the Carrier Bag Levy charging administration and if appropriate to make changes to the charging regime.

The council would nevertheless highlight that funds from the Carrier Bag Levy charging have recently been used to support district council local air quality management functions under Part III of the Environment (Northern Ireland) Order 2002. It is noted that Article 18 of the Order provides for the Department to make grants or loans to anybody or person for the purposes of or in connection with carrying out an air quality review or assessment, preparing and implementing an action plan; and the assessment or management of the quality of air.

The council would highlight that four Air Quality Management Areas remain across Belfast, associated with exceedances of annual and hourly mean human health based objectives for nitrogen dioxide. These exceedances have been determined principally to be as a consequence of road transport emissions.

The council's current Air Quality Action Plan is scheduled to conclude at the end of 2020 and so we are presently preparing to engage with our relevant authority partners to produce a new Action Plan. It is intended that this new plan will not only address the remaining nitrogen dioxide hotspots across the city but also address emerging pollutants of concern such as fine particulate matter (PM2.5) in order to safeguard human health and the environment.

The council would therefore emphasise the importance of the Department continuing to provide a suitable level of funding to support district council local air quality management functions and the development and implementation of ambient air quality mitigation actions, via either Carrier Bag Levy charging or an alternate local air quality management specific funding stream.

The council provides these comments in view of the Department's advice to councils in its various local air quality management letters of offer that local air quality management funding levels are subject to sufficient receipts being received by the Department from the Carrier Bag Levy and the Department's recently published Carrier Bag Levy Annual Statistics, which indicate that proceeds from the levy in 2018-2019 were £4.6 million; a decrease of £0.3 million or 6.1% from the previous year.

## **6. Ban on Microbeads**

**DAERA will continue to support the ban on microbeads by working with councils.**

Whilst BCC supports this ban, it is not a new proposal. This statement is light on detail as to how DAERA will be supporting Councils on the ban. We would encourage the Department to develop a more thorough plan and extend the concept from microbeads to other problem areas (for example, clothing fibres from washing machines through to water treatment plants and beyond and also the problem of marine plastic and nurdles on our shorelines).

## **7. Consumer Food Waste Prevention**

**DAERA will continue to work with WRAP to deliver its Love Food Hate Waste consumer food waste prevention campaign in Northern Ireland. WRAP will establish and engage a network of campaign partners through the campaign will effectively engage with consumers, community groups, local authorities and educational bodies WRAP and DAERA will collaborate to develop follow-up campaigns to build capacity for behavioural change and waste prevention messaging aimed at food waste reduction.**

BCC is broadly supportive of this campaign but it could be improved by demonstrating a strong commitment to addressing social issues such as food poverty and developing a joined up approach around re-distribution of food (and perhaps even other products) to those who need it the most.

## **8. Champions12.3**

**DAERA learn from the Champions 12.3 coalition and will get involved in activities which are aligned with its goals.**

BCC is broadly supportive of this concept. However, more detail would be welcomed, on the types of activities and degree of involvement suggested.

## **9. Courtauld 2025**

**DAERA will continue to support WRAP in this campaign to work with local businesses, NGOs and sector organisations to reduce food and drinks waste arisings in the UK by 20% by 2025 compared to 2015, calculated as a relative reduction per head of population.**

BCC is broadly supportive of this but would welcome more detail of the level of support to be offered, as well as the local impact within NI (including measurements).

## **10. Food Redistribution**

**DAERA will collaborate with FareShare and other food redistribution networks to minimise avoidable food waste by raising the profile of the organization and identifying opportunities for them to partner with both businesses and public bodies. DAERA will support specific projects aimed at prevention of food waste.**

BCC welcomes this proposal and would encourage a regional approach to tackling food re-distribution across Northern Ireland. (For example, working in partnership with local governments, through SOLACE NI).

### **11. Business Resource Efficiency - Invest NI**

**DAERA will collaborate with Invest NI to promote their waste prevention initiatives particularly those relating to resource efficiency and industrial symbiosis. This will help to build closer links with business, industry and their representatives.**

BCC broadly supports this and would welcome the development of a platform, such as a marketplace database or software to share such information.

We would re-iterate our comments in the opening section on the opportunity to develop a Materials Flow Survey: We recommend that DAERA commissions a large-scale study of the flows of materials in Northern Ireland to establish and map the whole picture of consumption, production and waste, which will serve to identify the issues and most impactful opportunities.

We would highlight that other mechanisms already exist to support waste prevention, and suggest that some work should be done to identify and promote these. For example, WARP-IT is a web-based system which facilitates reuse within and between organisations: <https://www.warp-it.co.uk/>

### **12. Prosperity Agreements**

**DAERA will work with our Prosperity Agreement partners to identify opportunities to promote resource efficiency and waste prevention measures. In particular and where possible we will aim to include food redistribution actions and areas of agreement around the reduction of packaging to help reduce waste.**

BCC supports this proposal and would encourage DAERA to promote the existing scheme better with case studies and highlights of the benefits and results, including annual reports.

### **13. Eco-Schools Programme**

**DAERA will continue support for the Eco-Schools Programme in order to maximise opportunities for learning and teaching about waste prevention. We will aim to introduce a specific topic on waste prevention into the Eco-Schools curriculum.**

BCC encourages DAERAS support around opportunities for learning and teaching about waste prevention. However, it is also worth noting that the Eco-Schools programmes depends on funding, including that from local authorities. In the current climate of austerity measures, decisions continually need to be made regarding the best use of council financial resources.

### **14. Eco-Hospitals Programme**

**DAERA are investigating the feasibility of introducing a similar scheme in Northern Ireland. By engaging staff, students, local businesses, contractors and suppliers as well as visitors, we will highlight the importance of environmental protection and in particular waste prevention. We aim**

**to initiate a trial on one site to further assess the potential environmental and financial benefits of such a scheme. If successful this scheme can be rolled out wider within the health sector.**

BCC supports this feasibility investigation and awaits the outcome on the findings.

#### **15. Working with NI Education Authority**

**DAERA will collaborate with the Education Authority to help reduce waste both in classrooms and through their catering service. DAERA will use the learning generated through this forum to help inform further waste prevention interventions with the wider public sector in NI.**

BCC strongly supports this proposal and awaits the findings from the learning generated.

#### **16. Reuse and Repair Network**

**DAERA will undertake a feasibility study into the economic and social benefits of establishing a reuse and repair network in Northern Ireland. If found to be a viable option we will develop a business case to work towards establishing this. If established further investigations will be carried out to ascertain whether a reuse quality mark would add further value to a network.**

BCC supports this concept and would welcome a pathways to employment approach that supports participants as they work to improve their quality of life, gain skills, realise their potential and have greater opportunities for employment.

#### **17. Support to the Third Sector**

**DAERA will continue to support the Third Sector as part of ongoing funding operations and investigate new ways to do so.**

BCC fully supports this action. We would welcome reference to social inclusion and support of a Social Value Act for NI. There is an opportunity here for DAERA to link up with other government departments to stimulate the circular economy and to promote the associated socio and economic benefits as well as environmental ones. One simple step that government could take could be through insuring that social value is included in public procurement. The potential of the circular economy is huge within Northern Ireland and it could provide many opportunities to bring social benefits, (such as strengthening local economies and businesses), empowering communities and building resilience.

#### **18. Zero Waste/Circular Economy Projects**

**DAERA will continue to support “zero waste” projects where our objectives align and funding is available.**

BCC strongly supports this action and suggests that a good step would be to perform a regional materials flow study as this would better inform other actions. To facilitate a strategic approach to waste prevention, and in the context of creating a circular economy, we recommend that DAERA commissions a large-scale study of the flows of materials in Northern Ireland to establish

and map the whole picture of consumption, production & waste. Such a map would clearly identify the main issues in the system and, therefore, clarify what the priorities should be. As well as encouraging a systematic approach to waste prevention, this map would serve to facilitate NI's transition to a circular economy.

## **19. European Week for Waste Reduction**

**DAERA will continue to support the European Week for Waste Reduction and build upon any successes arising from entries to its competitions.**

BCC supports this continuing programme and welcomes opportunities to expand to include other sectors and best practice studies.

## **20. Tap Water Refill Scheme**

**DAERA will continue to promote and publicise water refilling schemes in conjunction with NI Water, local Councils, local businesses and their staff to reduce waste from single-use plastic bottles and to promote reusable bottles.**

BCC supports this this scheme and would be keen to explore potential opportunities to work in partnership to expand developments in Belfast.

## **21. Social Media Campaigns**

**DAERA will continue to promote reuse and reduction through social media campaigns on our new social media platform, MyNI, in tandem with existing messaging on NI Direct and associated social media posts to raise awareness of the content. DAERA will develop specific campaigns in conjunction with these channels to raise awareness of waste prevention.**

BCC supports the opportunities that social media campaigns offer and agree that these should be delivered as one part of a wider, holistic programme aimed at behavioural change.

## **22. Local Authorities**

**DAERA will continue to collaborate with and support local authorities/councils to ensure they develop waste prevention plans in their areas and will continue to encourage and assist with further developing their plans into the future.**

Whilst BCC Broadly supports this concept, we would note that Local Authorities have more input downstream than upstream with regards to material generation and flow. Local authorities are dealing with the collection and treatment of a product that has already been produced and are somewhat limited to what they can do in reducing established patterns of production and consumption. It is also worth highlighting that local authorities are bound by legislation that promotes recycling and diversion targets, rather than waste prevention. Again, this is not in the true spirit of the Waste Hierarchy.



To re-iterate, we require a regional approach to waste prevention and central government plays a significant role in this. The Waste Prevention Plan needs to be integrated and collaborative and underpinned by a NI wide, resourced strategy.

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