

Appendix 2: Belfast City Council Draft Response to the Future Recycling & Collection of Waste of a Household Nature in Northern Ireland (Public Discussion Document DAERA)

Proposals 1-5 Non Household

Proposal 1: *In order to increase food waste collected from the non-household municipal sector, the food waste regulations should be reviewed to ensure obligated businesses segregate food waste for collection.*

Q1 Do you agree or disagree that the Food Waste Regulations (Northern Ireland) 2015 should be reviewed regarding food waste collections from food businesses?

Agreed, that these regulations should be reviewed to assess types of organisations which should be required to follow the regulations. There should also be adequate monitoring and enforcement of the regulations.

Q2 If the Food Waste Regulations (NI) 2015 were to be reviewed which of the following areas should be investigated?

Awareness	Strongly Agree
Requirement to separate food waste	Agree
More business types to be in scope	Agree
Access to food recycling services	Agree
Charging levels	Not sure (more details required)
Monitoring of compliance	Agree
Enforcement	Agree
Data & reporting	Agree

Proposal 2: *We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to require these establishments to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste collectors.*

Q3. Do you agree or disagree that all businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable materials from residual waste so that it can be collected and recycled?

Agree

Q4. Which of the two options do you favour?

Option 2 – mixed dry, separate food, separate glass. Greater range of materials than option 1 while emphasis on quality by keeping glass separate.

Agreed, though positive buy in from business is essential.

Q5. We would expect businesses to be able to segregate for recycling in all circumstances but would be interested in views on a preferred position for instances where this may not be practicable for technical, environmental or economic reasons.

Not sure - Important to consult with business sector as some may be limited in terms of the space or capacity available for separate containers. Also, where possible collections should be incentivized to promote recycling rather than residual disposal. An analysis on the impact of the regulations would be needed and especially the options for SMEs

Q6. Should some businesses be exempt from the requirement?

Not sure – consultation with business community is important as Q5.

Q7. Do you have any other comments to make about Proposal 2?

Suggest investment in a communications campaign aimed at businesses perhaps delivered by WRAP to the representative Business communities e.g. Chamber of Commerce, Belfast Chamber, Federation of Small Businesses, etc. etc. This could focus on the benefits of pursuing this goal from a commercial perspective; corporate social responsibility, Climate Change actions, potentially financial incentives. Council Services which deliver business start-up activities may also be an appropriate channel.

Proposal 3: *As rural communities make up a significant proportion of Northern Ireland, we propose to review the impact on businesses in rural communities so that they are not disproportionately affected by laws introduced to increase recycling of non-household municipal waste.*

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

Cost of recycling services compared to urban areas	Yes
Reconfiguration of services to ease cost burden	Yes
Access to recycling services	Yes
Issues with communicating to rural businesses	Yes

Q9. Any other specific factors should be included in the assessment of the policy that may have a different impact on businesses in rural settlements?

With regard to communications, broadband provision in rural areas is not as widespread and as effective as urban areas and as such communication tools should be designed accordingly.

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

Q10 We would welcome views on these options and also evidence of other measures that may be available to support business recycling and to reduce costs for businesses.

Improving access to drop off sites and HWRCs for business use	Likely (1)
Focus on problem materials	Unlikely
Provide advice on rationalizing services	Likely
Sharing of containers	Likely (2)
Regional procurement of services	Likely
121 support and advice	Likely
Clearer information on what can be recycled	Likely
Information on reducing costs	Likely
Better data to measure performance	Likely
Standardisation in pricing from collectors	Likely

Combining door to door & commercial collections	Likely
Better access to kerbside services	Likely
Rewards for businesses that recycle	Unlikely (3)
Govt subsidies	Likely
Cross boundary working options	Likely
Clarity on how and where waste is treated	Likely

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

(1) This has the potential to pass the cost burden on to the resident/rate payer unless the legislation pertaining to HWRCs is reviewed and amended to prevent the potential for trade waste to become an additional cost to dispose of by Council ratepayers e.g. charging scheme for use/ cost recovery would need to be considered

(2) This option would be problematic when enforcement is required regarding waste containers – who is accountable? Which organisation?

(3) Research to date suggests that incentive schemes have little value in driving positive behavioral change in waste.

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

It would be helpful for DAERA to look at best practice in the UK or other European models and work with the business sector on how this can be managed in terms of cost impacts for them. Our main concern is that the burden should not be transferred onto the local council rate payers.

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

See previous comments in relation to Q7 and the establishment of a WRAP Commercial service.

Proposal 5: *In advance of implementing changes to business recycling, we will work with waste producers and waste collectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to further consultation.*

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

Yes. There should be an onus on the waste producer to report on waste tonnage and disposal outlets. This assists with regard to Duty of Care and can also potentially drive more efficient businesses looking to tackle areas of waste.

Q15. Who should bear the responsibility of reporting data on waste from businesses and other organisations?

Producers/businesses where the waste is produced. It is envisaged that the proposal to introduce waste tracking requirements as part of the UK Environment Bill, would greatly assist in this regard and minimise administrative burden on organisations.

Q.16 What specific data sets would your organisation find useful if businesses were required to report under proposal 7?

For further discussion when the premise of data collection has been agreed.

Proposals 6-17 Household

Proposal 6: *That all Councils in Northern Ireland should be required to restrict capacity for residual waste from households to help divert more materials into the recycling waste streams.*

Q17. *Do you agree or disagree with the proposal that Councils should be required to restrict capacity for residual waste from households to help divert more materials into the recycling waste streams?*

Agreed, it has been shown that a reduction in residual capacity via collection frequency and/or reduction in residual bin size coupled with an increase in recycling capacity can act as a driver for the reduction of residual waste and the increased use of recycling facilities.

Residual waste restriction should take into account the numbers and sizes of residual bins/containers associated with each household as well as collection frequency.

Q18. *Assuming there will be necessary exemptions for key property types, do you have any preference with the proposals that Councils should be required to restrict residual waste in different ways?*

The means of restricting the residual bin capacity (container size, collection frequency or both) should be the decision of the Council and may be based on public consultation.

Q19. *If residual restriction was to be implemented which enhancements should be made to the recycling service to help increase performance and ensure consumers are satisfied with the overall services offered?*

Given the challenging financial circumstances facing Council's in the midst of a Covid-19 pandemic, any enhancements to services such as those suggested would require additional funding from central government.

Proposal 7: *By 2023 to legislate for Councils to provide all kerbside properties and flats with access to at least a weekly collection service for food waste.*

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

At least a weekly collection of food waste	Agree
A separate collection of food waste	can only
be achieved in a phased manner	Agree*
A weekly mixed food and garden waste collection	Disagree
Services to be changed only as and when contracts allow	Agree
Providing free caddy liners	Agree

The public discussion document states that “we propose to require that from 2023, all Councils offer all households a weekly food waste collection...except where it was not technically, environmentally or economically practicable.”

This is different from introducing legislation by 2023 to require Councils to collect food waste separately.

We believe that the 2023 time frame for introducing collections is optimistic and does not take cognisance of contracts which may already be in place and which place obligations on local Councils to provide specific waste streams to re-processors. The lead in time around

model development and feasibility and procurement timelines needs to be factored in. BCC would welcome a NI focused discussion on the challenges of this

*Where the Council has introduced pilots to explore the additional yield obtained from weekly food waste collections these have generally been positive and supportive of the WRAP research on this issue.

Proposal 8: *That all Councils in Northern Ireland should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.*

Q21. *Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that Councils should be required to collect a set of core materials for recycling?*

Agreed, a core set of dry recyclable materials will allow for consistent messaging across NI and feed into the growth of secondary material markets.

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

Agree

Q23. What special considerations or challenges might Councils face in implementing this requirement for existing flats, HMOs?

HMOs and apartments have a number of distinct challenges which can make it extremely challenging to collect recyclables and in particular segregated recyclables;

- Space restrictions for bin containers and bin stores which make it difficult to retrofit containers.
- Resident “churn” - presenting communication challenges and lack of attachment to the local community
- Landlord support and buy-in required to assist with delivering recycling message and understanding that residual bin provision only approach needs to change.
- Enforcement – communal bins present issues in terms of identifying responsibility for contamination
- BCC would strongly recommend and welcome fuller engagement with relevant Government Departments on this including DFC, and look for innovation and best practice models that exist in other UK university cities on how to improve recycling and behavior change and participation by all the relevant stakeholders e.g. landlords and HMO occupiers.

Q24. *Do you have any other comments to make about Proposal 8?*

The public discussion document seems to define “Collections” in the context of curbside collections. Household Waste Recycling Centres and bring sites are important collection methods and can offer alternatives when presented with some of the challenges highlighted.

Will these methods of collection be defined as passive collection schemes and could therefore be considered in terms of any requirement to collect certain waste streams separately?

Proposal 9: *That the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.*

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

Agreed, this list of materials seems logical and fits with what most Councils are already doing.

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

Plastic bags & film Not sure

Black plastic food packaging Not sure

The core materials in Proposal 9 have readily identifiable markets at present, while the additional materials in Q26 do not. Over time hopefully a greater range of materials will be included and the core materials should be reviewed periodically. However, it should be noted that certain waste streams may require bespoke collections due to capacity restrictions on the vehicle or potential contamination concerns and as such will require additional financial support from central government.

Q27. *If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?*

Is there a proven, reputable business (preferably local market) re-processing these materials? Can the collection system (container, vehicles) manage the new materials? Is there significant financial pressures associated with collecting any particular stream and can these be supported?

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

No

Proposal 10: *To review this set of core materials regularly reviewed and, if appropriate, expand over time provided that:*

- *evidence supports the benefits;*
- *there are viable processing technologies for proposed materials;*
- *there are sustainable end markets;*
- *Councils would not be adversely affected, including financially.*

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

Yes- future legislation such as the Extended Producer Compliance and Deposit Return Scheme are likely to have significant impact on the materials and how they are collected. Any legislation needs to be flexible in this regard and not only add to the core list but also potentially allow for the removal of core materials should the circumstances arise.

Q30. *Do you believe that the proposed conditions (a) to (d) above are needed in order to add core materials?*

Yes – also to ensure that there is a recognition of the demands of future legislative change.

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

No

Proposal 11: *We propose to review the separate collection of materials in Northern Ireland and supporting guidance to help clarify the position on current and future collections assisting Councils and waste operators in decision making on separate collection.*

Q32. *Do you agree that a review of separate collection requirements is required for Northern Ireland to inform municipal collections in light of proposals for core sets of recyclable materials and new producer obligations under Extended Producer Responsibility (EPR)?*

Yes, this would be beneficial but only following the outworking's of the EPR, DRS and other legislative changes.

Q33. *What circumstances may prevent separate collection of paper, card, glass, metals and plastics?*

There may be exceptions to certain household categories as noted above due to space restrictions (apartments, HMOs, Purpose Built Managed Student Accommodation).

New arrangements for separate collection may lead to additional collection costs (capital & revenue) and adequate central government funding will be required to deliver on this proposal.

Introduction of new legislation may result in different collection methodologies and business models (take back schemes, postal, deposit points) introduced by producers resulting in minimal amounts being collected by Councils. There may be a break-even point at which it is no longer viable to collect certain materials.

Proposal 12: *To provide national guidance for Northern Ireland to help establish greater consistency in recycling and waste collection services and reduce confusion for households.*

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

Publish non-statutory guidance which allows for local divergence in particular circumstances. It is unlikely that a one-size fits all approach will be readily achievable given the differing positions of Councils on this matter.

Explore similar guidance to the Wales Blueprint Collections model, with the guidance then being used to influence support funding in line with the Department's policy steer.

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

No

Proposal 13: *To continue the support by the Department for Recycle Now⁸ and the tools produced by WRAP to help Councils and other campaign partners to communicate effectively on recycling.*

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

Yes, agree with ongoing support of WRAP who offer valuable assistance to Councils on waste related matters. The Recycle Now and MyNI sites require enhanced promotion and awareness for the public.

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

- What does and doesn't go in the container
- Collection day(s)
- How to order a new or replacement container
- How to obtain food caddy liners
- What happens to their waste – it doesn't all end up in landfill !
- End destination – builds trust and confidence
- Contamination & why quality matters
- Feedback on how they are helping the environment, society and the circular economy in NI

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

Q38. *Do you agree or disagree with this proposal?*

Agree – Government should work with Councils and other stakeholders on this to deliver an end destination report/information/web site, showing where materials end up. This dispels the myth that it all ends up in landfill anyway, still repeated although less often than in the past and it also shows how much of the materials can remain at home benefiting the local economy.

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

No

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

Q40. *Do you agree or disagree with this proposal?*

Agreed that the government should introduce regulation on MRF reporting. The requirement for the submission of accurate data will aid better decision making and market confidence in secondary materials. This is likely to be a requirement of the new Circular Economy Package regarding the definition of "recycling" which will mean not that which is collected but rather re-processed (after contamination is excluded)

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

No

Proposal 16: *We propose developing an updated set of recycling and waste indicators to monitor performance and cost efficiency as well as to highlight where services may be improved. We will work with Councils to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.*

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

Agree that additional, complementary, indicators may be required to sit alongside the standard measures for example to examine contamination or carbon etc. but less convinced

about cost efficiency indicators as this can lead to a significant administrative burden for Councils, capturing the information and different interpretations on what should be included within the costings (e.g. APSE and BVPI)

Q43 & 44. Do you consider that any of the current set of 15 indicators should be removed?

Yes – W3 the amount of Local Authority Collected Municipal Waste Arisings, is not particularly helpful, in that it is more a measure of the state of the economy than a specific waste indicator.

W2 – The amount of biodegradable LACMW that is landfilled is starting to lose its currency in terms of no further NILAS targets beyond 2020. Perhaps the Department should refresh the NILAS regulations and seek to set new targets for this important waste category and in tackling food waste.

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

Some additional indicators such as the following;

Kg recycled (dry recyclables) per annum per capita

Kg organics treated (composted/AD) per annum per capita

Kg residual waste per annum per capita

Per capita rather than per household as the latter may vary across Local Authority. The residual indicator rather than just a landfill rate shows how much per head is still being discarded and not recycled/composted.

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

By way of benchmarking the Department may wish to consider following similar lines as the Welsh government;

<https://myrecyclingwales.org.uk/local-authorities>

Proposal 17: *We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these to better measure reductions of carbon emissions associated with waste in Northern Ireland.*

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

Agree that alternative metrics need to sit alongside the weight based metrics. These new indicators should provide insight into not just recycling performance but also the carbon, air quality and climate agenda to show the role which waste management can contribute in this field.

Carbon metrics, such as the Zero Waste Scotland Carbon Emissions modelling, can also provide a more nuanced approach in terms of focusing on high carbon embedded materials rather than chasing weight-based materials which have a less detrimental impact on the environment.

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

Agree – weight indicators are still very relevant in the waste industry as “common currency” but additional measures which reflect the new climate agenda must also be developed.

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

See response to Q47.