

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

Public Discussion Document

Abridged Version



Sustainability at the heart of a living, working, active landscape valued by everyone.



Department of

**Agriculture, Environment
and Rural Affairs**

www.daera-ni.gov.uk

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Glossary

AD	Anaerobic Digestion
BID	Business Improvement District
BLACMW	Biodegradable local authority collected municipal waste
CCEN	Collaborative Circular Economy Network
CEP	Circular Economy Package of Directives
Co-mingled	Involves the collection of materials in a single compartment vehicle with the sorting of these materials occurring at a MRF (Materials Recovery Facility).
CWR	Controlled Waste and Duty of Care (Northern Ireland) Regulations 2012
DAERA	Department of Agriculture, Environment and Rural Affairs
DEFRA	Department of Environment, Food and Rural Affairs
DOE	Department of the Environment
EC	European Commission
EfW	Energy from waste
EPR	Extended Producer Responsibility
EU	European Union
GHG	Greenhouse gas
HH	Household waste
HMO	House in Multiple Occupancy
HWRC	Household Waste Recycling Centre
IVC	In Vessel Composting
Kerbside sort	Sorting of materials at kerbside into different compartments of a collection vehicle
Kpi	Key performance indicator
NHM	Non-household municipal waste
MRF	Materials recovery facility
NI CEP Report	Northern Ireland Circular Economy Package Report
NIEA	Northern Ireland Environment Agency
NISRA	Northern Ireland Statistics and Research Agency
PfG	Programme for Government
Recycle Now	The national recycling campaign, supported and funded by Government, managed by WRAP
Recycling Tracker	WRAP's annual survey of UK households that gathers evidence on recycling attitudes, knowledge and behaviour.
Residual	Waste which remains after recycling

rWFD	revised Waste Framework Directive (2008/98)
SDG	United Nations Sustainable Development Goal
TEEP	Technically, Environmentally and Economically Practicable
Two stream	Residents are provided with two recycling containers and are asked to place different materials in each container, typically paper/card (fibre) in one and plastics, glass and cans (containers) in the other. These materials are kept separate but collected on one vehicle which has two chambers.
WasteDataFlow	The web-based system for municipal waste data reporting by UK local authorities to government.
WCLO	The Waste and Contaminated Land (Northern Ireland) Order 1997
WML	Waste Management Licensing Regulations (NI) 2003
WRAP	Waste and Resources Action Programme
UK	United Kingdom

1. Future Recycling and Separate Waste Collection of a Household Nature in Northern Ireland: Summary

Household recycling has long been supported by government in Northern Ireland making it easier for householders to recycle. Through a range of support measures since 2010, Department of Agriculture, Environment and Rural Affairs (DAERA) and its predecessor Department, the Department of the Environment, has invested £40m of support to Councils to increase recycling capacity for dry materials, for food waste and garden waste (organics) and other measures to promote recycling and improve recycling behaviours.

While many Councils continue to make improvements and have introduced new services, some have seen a levelling off in recycling rates. The Department recognises the need to increase the rates of recycling and as a result improve not just the quantity of recyclates but the quality of recyclates going to the re-processors for the end markets. In addition, apart from Landfill Tax, which incentivised diversion from landfill disposal and the introduction of the Food Waste Regulations (Northern Ireland)¹ in 2015 which has significantly helped increase recycling rates of food waste since its introduction, there are very few current drivers to encourage Councils to improve the way they recycle or for businesses to invest in recycling services. This makes it harder to improve the quantity and quality of what we recycle and frustrates householders who want to recycle more but who are increasingly confused over what can and cannot be recycled in their area, which unintentionally leads to mistakes in what is recycled. We want to tackle this confusion and make recycling easier for everyone.

In 2018/19, Northern Ireland's household recycling rate was 50.2%², meeting planned delivery targets. While this is great progress from the low base for recycling in 2000 of 5% with a heavy reliance on landfill, there is more to do. Not only to strive to meet proposed recycling targets (65%) and reduced landfill targets set within the EU Circular Economy Package (CEP), which is due to be transposed in July 2020, but to make the most of opportunities to maximise the economic potential of recycling, to make a contribution to meeting future climate change commitments set out in the New Decade, New Approach Deal³ and help the UK reach net zero carbon emissions by 2050⁴

To support this next stage, in 2019, The Department commenced a three-year £23 million capital programme through the Household Waste Recycling Collaborative Change Programme⁵. It provides assistance to Councils to transform kerbside recycling and Household Waste Recycling Centre (HWRC) infrastructure and services. The services and infrastructure being funded will provide Northern Ireland with a sound foundation for the next 10-15 years as the UK and EU moves towards the delivery of a circular economy and contribute to our economic competitiveness and resilience.

A recent WRAP study⁶, (which should be read along with this discussion), has looked at the feasibility of Northern Ireland reaching the 65% recycling targets for the new definition of municipal waste⁷ which will now include business waste of a household nature. The study identified that it is feasible but there would be significantly more business recycling required. The study also identified that medium and larger businesses could reduce their costs by recycling more or it would have a

¹ The Food Waste Regulations (NI) 2015 which amend the Waste and Contaminated Land (Northern Ireland) Order 1997 ([S.I. 1997/2778 \(N.I. 19\)](#)); the Pollution, Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013 ([S.R.2013 No.160](#)); the Waste Management Licensing Regulations (Northern Ireland) 2003 ([S.R.2003 No.493](#)) and the Landfill Regulations (Northern Ireland) 2003 ([S.R.2003 No.496](#))

² <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/lac-municipal-waste-2018-19-report.pdf>

³ <https://www.gov.uk/government/news/deal-to-see-restored-government-in-northern-ireland-tomorrow>

⁴ <https://www.theccc.org.uk/publication/reducing-emissions-in-northern-ireland>

⁵ <https://www.daera-ni.gov.uk/news/daera-pumps-ps23-million-making-recycling-easier>

⁶ <http://www.wrapni.org.uk/content/daera-recycling-discussion-document>

⁷ Municipal Waste is a combination of household waste and household like waste (e.g. paper, packaging and food waste) produced by businesses – it does not include construction and demolition, industrial waste or other waste that are not similar in nature to household waste. See Section 3.1 for full definition.

cost neutral effect. There was some new cost burden identified for small to medium business (SME's); please see the full version of this document for further discussion on this.

The study also indicates that the most appropriate collection models for household collections were those which include the full range of dry recyclable materials that could be collected at kerbside (paper, card, glass, cans, glass, and plastic containers), where food waste would be collected weekly, garden waste collections would remain and some form of further residual restriction could be implemented. The higher capture of food waste and corresponding restriction in residual waste were the most important design factors particularly in being the least costly, complementary and higher performing scenarios.

For wider municipal collections the optimum scenarios were for businesses and the public sector to have regular collections of dry recyclables (paper, card, and drink containers), a separate glass collection where this material was generated, food waste collections for all businesses and a residual collection for any remaining non-recyclable waste material.

Since March 2020, the Covid-19 virus has resulted in significant changes in the operations of businesses and other organisations, including an increase in the number of people working from home or furloughed. These changes have and will continue to impact waste arisings and composition for the foreseeable future. Long term impacts on recycling and waste arisings and operations are unknown and it will take a while to properly understand data to determine the cross sector impacts. The Northern Ireland CEP report study was based on the best available historical data and evidence and WRAP intends to update the CEP analysis in 2020 with the most up to date scheme figures. WRAP will undertake an initial review of the impacts of Covid-19 on the sectors affected in this study to identify any early trends in results and implications on resource management for the next few years.

Notwithstanding the impacts of Covid-19, we think it is the right time to think about how we can best achieve the changes outlined above. In summary we are seeking your views on how to:

- improve the quality of recycled materials as well as increasing the quantity collected;
- ensure there is a strong linkage between waste management and the local economy as opposed to the historical emphasis on solely meeting the EU Directive targets;
- assist in realising the potential economic benefits to the local economy, thus supporting Northern Ireland move towards a circular economy;
- help Northern Ireland improve our 'municipal waste' recycling rates and reduce the amount of materials going to landfill: and
- help reduce carbon emissions, greenhouse gases and pollution in NI.

The measures we are seeking your views on to increase non-household and household recycling are provided below.

1.1 Summary of proposals to improve recycling from businesses and other organisations that produce municipal waste which we are seeking views on

WRAP estimates that between 30-40% of municipal waste which is similar in nature to household waste produced by businesses and other organisations, is currently recycled. Given that the waste composition profiles of these sectors suggest high proportions of recyclable products, this performance could rise to 80%+ with the right measures. This represents a huge opportunity to increase recycling in this sector and a significant step towards a more circular economy.

We are seeking views on a range of proposals to improve recycling from business and other organisations. These are;

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

1.2 Summary of proposals to improve recycling from households in Northern Ireland which we are seeking views on.

Members of the public are often confused about what their local Council collects for recycling, by sometimes complex bin rules, as well as inconsistencies between Councils in what they recycle and what can be placed in each bin. As a result, some householders either do not recycle all they can, or they might inadvertently contaminate recycling bins with items that are not collected locally for recycling or that cannot be recycled, (e.g. soiled packaging or nappies). Such contamination can reduce the quality and value of materials recycled and might even lead to whole loads being rejected at reprocessing or sorting centres. Contamination can also reduce demand for secondary materials as producers lose confidence in the flow and quality of recycled materials and turn to primary raw materials instead. NI stakeholders have also stated that the need to improve the quality of recycle and demand for secondary materials are important preconditions for increasing recycling and to encourage producers and packagers to use more recycled materials.

Building on recent successes for household recycling – WRAP estimates that households have the potential to achieve 58% waste recycling by 2030. Increases from improved HWRC provision are also key and the council role will continue to be vital in enabling this. The challenge is to develop recycling collection systems that can capture increased quantity at the right quality, be economic and at the same time reduce confusion about what can be recycled.

In addition we think these ambitions could be supported by non-binding performance indicators to help Councils to deliver high quantities of good quality recycling. We would want to work with the Councils to develop these indicators and are therefore consulting on what the indicators might look like and whether this approach would assist Councils to help deliver recycling ambitions.

We also recognise that the current weight-based recycling targets favour the collection and recycling of heavy materials, for example garden waste, over other more environmentally-beneficial measures to promote dry recycling. Carbon intensity is one metric that has been used widely as an alternative for measuring recycling performance. Reforms to producer responsibility may drive further changes in product design and make weight-based metrics less effective at driving environmentally sustainable behaviours. We are therefore seeking views on how best to apply supplementary targets to weight-based targets and metrics.

We are seeking views on

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

- **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.
- **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.

The discussion that follows sets out the current position of recycling in Northern Ireland, and the current and new regulatory, climate change and market drivers that will influence policy in the future. It will not introduce any new policies, but makes suggestions on possible ways to increase recycling, including case studies of successes in other jurisdictions. It also seeks views on how to best implement the new EU Circular Economy Package (CEP), in particular the changes to the Waste Framework Directive 2008/98/EC, (amended by Directive 2018/851 of 30 May 2018) in relation to separate collection and highlights the benefits of better-quality recyclable materials for the circular economy. It is concerned with measures to improve the quantity and quality of what we recycle both at home and at work in Northern Ireland and we support the view that there is a strong strategic, economic and environmental opportunity to do so. We believe these measures will help to transform recycling in Northern Ireland and to increase recycling rates significantly above 50% towards the much higher recycling rates of 65% by 2035 and landfill rates to 10% by 2035.

Waste and resource management is a devolved matter and this consultation concerns Northern Ireland only. Subject to the outcome of this discussion there will be a further consultation in 2021 on regulatory changes to implement these measures and on potential supporting guidance.

2. Purpose of the Discussion Document

WRAP⁹ estimates that about 56,000 businesses and other organisations in Northern Ireland produce municipal waste within the scope of the CEP (i.e. they generate waste which is similar in nature to household waste). Building on recent successes for household recycling – WRAP estimates that households have the potential to achieve 58% waste recycling by 2030. Increases from improved HWRC provision are also key and the council role will continue to be vital in enabling this. In the non-household municipal sector, and businesses in particular, there is the potential to contribute 80% of the municipal waste recycling target as there is a greater quantity of target recycling materials in non-household municipal streams. The challenge is to develop recycling collection systems that can capture increased quantity at the right quality and be economic.

The purpose of this discussion document is to give you, the stakeholders who will be affected by any decisions taken in the future, an opportunity to express your views on what our recycling environment should look like in the future, and how to improve the quality and quantity of municipal waste recycled in Northern Ireland. We welcome views on how our environmental priorities and objectives could and should be integrated into meeting these targets and how to include businesses and not for profit organisations.

In order to do this we need your views on steps towards improving recycling rates (55% by 2025, 60% by 2030 and 65% by 2035) in household (HH) and non-household municipal (NHM) sectors, how to improve reductions in food waste, cut landfill rates (10% by 2035) and how to get businesses on board. By radically changing the way we think about waste at every level; the producer, the processor, the retailer and the consumer, we can provide a sustainable basis to developing a circular economy and achieve the targets.

We want input from the widest possible range of respondents, and we look forward to receiving responses from all sectors, age-groups, organisations and individuals. Every response will be carefully considered and fed into the policymaking process.

For businesses and other organisations: we are asking for views on requirements for eligible duty holders in this sector (i.e. those businesses and other organisations that produce municipal waste) to separate their dry recyclables from residual waste so that these materials (e.g. plastic packaging, paper, card, metal and glass) can be collected for recycling, similar to households. We are also asking for views on how eligible businesses and other organisations in this sector, especially those that produce food waste in significant quantities, which are already required to be collected separately, should present this separately for recycling.

The changes we propose will help us to:

- meet our EU Withdrawal Agreement obligations to the CEP;
- achieve consistency in the materials collected for recycling;
- divert all food waste from the residual stream;
- make it easier for householders to recycle; and

⁹ <http://www.wrapni.org.uk/content/daera-recycling-discussion-document>

- help to significantly increase the quantity of material collected for recycling from businesses and improve the quality of recycling collected to respond to increasing demand and achieves better value in materials markets.

3. What Changes are we Proposing?

We propose to require all non-domestic businesses, public bodies and other organisations generating municipal waste to have to segregate the four recyclable waste streams glass, paper and card, metal and plastics from residual waste in order for it to be collected and recycled appropriately. The supporting analysis assumed that all businesses could segregate recyclables from residual and that in most cases the core dry recyclables would be collected mixed together.

Further review of the circumstances in which it may not be technically or economically practicable to collect it separately, or in which separate collection may not have significant environmental benefit will be undertaken by government. These proposals are in addition to the existing requirement for food businesses producing 5kg or more of food waste to separate it for recycling.

At the moment, very little NHM waste is segregated for recycling. Therefore, at the very least, implementation of dry recyclables separated from food waste would improve quality. Ideally, we would want all eligible businesses and other organisations to also separately collect glass and food waste. To make these changes it would be necessary to amend legislation to require businesses and other eligible organisations in this sector to present their waste separately for collection. It might be appropriate to exempt some firms from provisions, similar to current exemptions for food waste. This might be most appropriate for micro firms where the costs of compliance might be higher.

The Department's intention would be to legislate to ensure materials are segregated from residual waste for collection. Detailed requirements on arrangements for segregation of dry materials, glass and food waste would be set out in guidance following a review of the current advice that sets out where it is technically, economically and environmentally practicable (TEEP). The updated NI guidance would cover best practice service delivery and options to assist businesses to comply with requirements. Similar to household collections a core set of recyclable materials would be proposed, which allows for differences in the waste material generated by different establishments and the range of materials can be expanded over time.

We would expect businesses to be able to at least segregate recyclable waste from residual waste in all circumstances so that it can be collected and recycled. We would be interested in views on where this may not be practicable for example for technical, environmental or economic reasons. Where waste was not appropriately segregated for collection, the Northern Ireland Environment Agency (NIEA) would be able to take enforcement action, requiring arrangements to be made for segregating waste as necessary.

4. Costs of Proposed Waste Management

Our analysis shows that large and medium-sized firms should benefit financially from greater segregation of materials for recycling and evidence suggests that some may already have such arrangements in place. This would suggest that costs should be manageable for them and benefits should be realised. For some small and micro firms, however, the costs do increase substantially depending on container types and service level offered. It is important to note however that many small and micro businesses use sack type collection systems and so actual costs, particularly under longer term contracts, would be expected to be lower than the numbers outlined above. Without detailed reporting of container systems nationally it is not possible at this stage to estimate costs more accurately.

Regardless of actual costs, it is important to develop options with which to mitigate against any cost increase for businesses. We want to identify ways to reduce the costs of waste collection for this sector and support sustainable recycling behaviour. WRAP UK has worked with small firms and their representatives to explore options for reducing costs; this work is ongoing.

There are a number of measures available that could be used to minimise the costs of waste collection and recycling. We would welcome views on these and also evidence of other measures that may be available to support business recycling and to reduce costs for small and micro firms.

5. Consultation Questions

Proposal 1: In order to increase food waste collected from the non-household municipal sector, the Food Waste Regulations (Northern Ireland) 2015 should be reviewed to ensure obligated businesses segregate food waste for collection

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

- Agree
- Disagree

If you selected Disagree, please explain why.

[Free form box]

Q2. If the Food Waste Regulations were to be reviewed which of the following areas should be investigated:

	Strongly Agree	Agree	Disagree	Strongly Disagree	Not sure/don't know
Awareness of the Regulations to obligated businesses					
Requirements to separate food from all business types					

Options to amending the regulations for more business types to be in scope of the requirements					
Access to food recycling services for businesses					
Charging levels for food waste collection services					
Monitoring of business compliance					
Enforcement of business compliance					
Data and reporting of food recycling					

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

[Free form box]

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

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

- Agree
- Disagree
- Not sure/no opinion

If you selected Disagree, please explain why.

[Free form box]

Q4. Which of the two options do you favour?

- Option 1: mixed dry recycling and separate food recycling; no glass recycling
- Option 2: mixed dry recycling, separate food recycling and separate glass recycling
- Something else (please explain below)
- Not sure/no opinion

Please explain your selection

[Free form box]

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

- Yes – it should be practicable to segregate waste for recycling in all circumstances

- No – some exceptions are needed for particular circumstances (please provide examples below)
- Not sure/no opinion/not applicable

If you selected No, please provide examples below.

[Free form box]

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

- Yes
- No
- Not sure/no opinion

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

[Free form box]

Q7. Do you have any other comments to make about Proposal 2? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

[Free form box]

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

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

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

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

[Free form box]

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

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

Option	Likelihood of increasing recycling without a cost burden to businesses.				
	Very likely	Likely	Unlikely	Very unlikely	Not sure/don't know
Improving access to drop off sites and HWRCs for business use.					
More focus on problem materials such as office furniture, tyres, batteries, printer cartridges, fluorescent lights, fats and oils.					
Providing business advice on optimising/rationalising current services.					
Sharing of containers with neighbouring businesses.					
Regional procurement of services to enable economies of scale and reduce charges levied on businesses.					
One to one support and advice for businesses.					
Clearer information on what materials can be recycled and how.					
On-line tools and calculators to provide information on reducing costs.					
Better data to help businesses measure performance and benchmark.					
Standardisation in pricing approaches from private contractors.					
Combining door to door household and business collections.					
Better access and availability of kerbside services.					
Rewards for businesses that recycle such as incentives, ratings and reduced costs.					
Government or Industry subsidised cheaper costs of collection services.					
Reviewing cross boundary working options (both local authority and national level).					

Clarity in where and how waste and recyclables are treated.					
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Other:

[Free form box]

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

[Free form box]

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

[Free form box]

Q.13. Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements?

[Free form box]

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
- No
- Not sure/no opinion/not applicable

If you selected No, please explain why

[Free text box]

Q15. Who should bear the responsibility for reporting data on waste from businesses and other organisations (please select all that apply)?

- Producers (businesses and other organisations where waste is produced)
- Collectors (the organisations responsible for the collection of waste from businesses and other organisations)
- Re-processors/ treatment facilities (the organisations responsible processing and treatment of waste)
- Not sure/no opinion/not applicable

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

[Free form box]

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

Q17. Do you agree or disagree with the proposal that Councils should be required to restrict residual waste capacity (either by frequency or by residual container volume)?

- Agree – Councils should be required to restrict residual waste capacity
- Agree – Councils should be required to restrict residual waste capacity, **but on the condition** of also enhancing the recycling collections enhancements to recycling collections could be made by either increasing the range of materials collected, increasing the frequency of the recycling collections, or increasing the available recycling container capacity.
- Disagree – Councils should not be required to further reduce residual waste capacity by any means
- Not sure/don't have an opinion

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

(Note that Q17 looks at possible enhancements that could be made to possible restrictions of residual waste)

- Agree – Councils should be required to restrict residual waste bin volume while retaining existing collection frequency
- Agree – Councils should be required to restrict residual waste by reducing the collection frequency while retaining the same size container
- Agree – Councils should be required to restrict residual waste bin volume and reduce frequency
- Not sure/don't have an opinion

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

Potential Enhancement	Yes	No
Increased frequency of the dry recyclables collection		
Increased frequency of the food recycling collection		
Larger container capacity for the dry recyclables collection		
A higher frequency sanitary waste collection		

A collection of nappies for young families		
Other (please specify)		

[Free form box]

Not sure/don't have an opinion

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

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

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

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i) at least a weekly collection of food waste	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
(ii) a separate collection of food waste (i.e. not mixed with garden waste)	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
(iii) a weekly mixed food and garden waste collection	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
(iv) services to be changed only as and when contracts allow			
(v) providing free caddy liners to householders for food waste collections	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>

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

[Free form box]

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

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

- Agree – Councils should be required, to collect a core set of materials
- Disagree – Councils should not be required, to collect a core set of materials
- Not sure/don't have an opinion

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

- Agree
- Disagree

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

[Free form box]

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

[Free form box]

Q24. Do you have any other comments to make about Proposal 8? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

[Free form box]

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

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

	This should be included in the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Paper and card	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Plastic bottles	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Plastic pots tubs and trays	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>

Steel and aluminium tins and cans	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
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Q26. What other products or materials do you believe should be included in the core set that all Councils will be required to collect?

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

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?

[Free form box]

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

[Free form box]

Proposal 10: We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that:

- a) evidence supports the benefits
- b) there are viable processing technologies for proposed materials
- c) there are sustainable end markets
- d) Councils would not be adversely affected, including financially.

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

- Yes
- No
- Not sure/don't have an opinion

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

- Yes – but I would also add some
- No – some/all should be removed
- Not sure/don't have an opinion

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

[Free form box]

If you select some, please specify which conditions you believe should be removed

[Free form box]

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

[Free form box]

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

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

- Yes
- No
- Not sure/no opinion/not applicable

If you selected No, please provide examples below.

[Free form box]

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

[Free form box]

Proposal 12: Based on the preceding summary of the key issues, we therefore propose to provide national guidance for Northern Ireland to help establish greater consistency in recycling and waste collection services and reduce confusion for households.

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

Proposal	Agree	Disagree	Not sure/don't have an
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			opinion/not applicable
Publish Statutory recycling service guidance to detail service requirements?	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Publish Statutory minimum service standards guidance?	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Publish non-statutory guidance?	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>

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

[Free form box]

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

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

[Free form box]

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

[Free form box]

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

Q38. Do you agree or disagree with this proposal?

- Agree – government should work with Councils and other stakeholders on this
- Disagree – government should not work with Councils and other stakeholders on this
- Not sure/no opinion/not applicable

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

[Free form box]

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

Q40. Do you agree or disagree with this proposal?

- Agree – government should introduce regulation on MRF reporting
- Disagree – government should not introduce regulation on MRF reporting
- Not sure/no opinion/not applicable

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

[Free form box]

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

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

- Agree
- Disagree
- Not sure/no opinion/not applicable

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

- Agree
- Disagree
- Not sure/no opinion/not applicable

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

[Free form box]

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

[Free form box]

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

[Free form box]

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

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

- Agree
- Disagree
- Not sure/no opinion/not applicable

If you selected Disagree, please explain why.

[Free form box]

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

- Agree
- Disagree (why ...?)
- Not sure/no opinion/not applicable

If you selected Disagree, please explain why.

[Free form box]

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

[Free form box]

6. How to Respond

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

Online Survey

This discussion uses the [Citizen Space](#) Hub as the primary means of response, in order to make it as accessible as possible.

If you are unable to respond to the stakeholder consultation exercise via Citizen Space, written responses will also be accepted and should be sent to:

Single Use Plastics, Waste Prevention and Waste Recycling Policy Team

Environmental Policy Division

2nd Floor, Klondyke Building

1 Cromac Avenue

Gasworks Business Park

Belfast

BT7 2JA

Or e-mailed to: recyclingdiscussion@daera-ni.gov.uk

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

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

7. Freedom of Information Act 2000

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

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 as confidential information supplied to it 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:

Tel: (028) 9027 8757

Email: ni@ico.org.uk

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