



May 31st, 2024

Chairperson: Councillor C McCready

Vice-Chairperson: Councillor R Carlin

Aldermen: J Baird, M Gregg, S Skillen, J Tinsley

Councillors: S Burns, P Catney, G Hynds, P Kennedy, J Lavery BEM, A McIntyre, M McKeever, R McLernon, N Parker

Ex Officio:

The Right Worshipful the Mayor, Councillor A Gowan

Deputy Mayor, Councillor G McCleave

Notice Of Meeting

A meeting of the Environment and Sustainability Committee will be held on **Wednesday, 5th June 2024 at 6:00 pm** for the transaction of the undernoted Agenda.

Hot Buffet will be available in Members Suite from 5.15pm for Committee Members.

David Burns
Chief Executive

Agenda

1.0 Apologies

2.0 Declaration of Interests

- (i) conflict of interest on any matter before the meeting (Members to confirm the specific item)
- (ii) pecuniary or non-pecuniary interest (Member to complete disclosure of interest form)

📄 *Disclosure of Interests form.pdf*

Not included

3.0 Report by the Head of Service (Building Control and Sustainability)

3.1 Roadmap - Improving safety in high-rise residential buildings

For Noting

📄 *Item 3.1 BC - Report - Roadmap - Improving safety in high rise residential buildings (f).pdf*

Page 1

4.0 Report by the Head of Service (Waste Management and Operational Services)

4.1 "Re-thinking our Resources" - Consultation Response

For Decision

📄 *Item 4.1 W&OS Report - Rethinking our resources Consultation Response (F).pdf*

Page 4

📄 *Item 4.1 Appendix 1 W&OS - Rethinking our resources Consultation Response (f).pdf*

Page 6

5.0 Confidential Report from the Acting Director of Environmental Services

5.1 Out of Hours Dog Control Service

For Decision

Confidential for reason of information relating to the financial or business affairs of any particular person (including the Council holding that information).

5.2 Tender - Servicing and maintenance of waste compactors and containers

For Decision

Confidential for reason of information relating to the financial or business affairs of any particular person (including the Council holding that information).

5.3 Tender - ARC21 Street Sweepings Waste Contract Award

For Decision

Confidential for reason of information relating to the financial or business affairs of any particular person (including the Council holding that information).

5.4 Greenwood Storage Facility

For Decision

Confidential for reason of information relating to the financial or business affairs of any particular person (including the Council holding that information).

6.0 Any Other Business

Committee:	Environment & Sustainability
Date:	5 th June 2024
Report from:	Head of Service – Building Control & Sustainability

Item for:	Noting
Subject:	Roadmap: Improving Safety in High Rise Residential Buildings

1.0	<u>Background and Key Issues</u>
1.1	The Department for Communities (DfC) published their 'Improving Safety in High Rise Residential Buildings' Roadmap in late April 2024.
1.2	The Roadmap document can be found at https://www.communities-ni.gov.uk/publications/roadmap-improving-safety-high-rise-residential-buildings-implementation-ni-expert-panel-report
1.3	<p>The Roadmap document sets out the context on how NI will progress in the aftermath of the Grenfell tragedy where 72 people lost their lives to fire in a high rise residential building.</p> <p>It provides information on:</p> <ul style="list-style-type: none"> • the establishment of a new Residential Building Safety Division within DfC, • how it will cover a range of aspects including the building regulations, fire safety, the establishment of a building safety regulator and a new homes ombudsman, • the urgency to overhaul an overly complex current regulatory framework, • challenge the industry to move away from minimum standards of compliance, and • improve systems of legislation, policy and process through widespread consultation.
1.4	<p>It details the purpose and vision of the Roadmap as :</p> <ul style="list-style-type: none"> • communicate the proposed approach and actions for the newly formed Residential Building Safety Divisions work programme, • to advance the recommendations of the 'NI Expert Panel Report', and • to initially concentrate on fire safety matters but may at a later stage consider a wider remit.
1.5	<p>The Roadmap sets out a Phased Approach consisting of 4 Phases:</p> <ul style="list-style-type: none"> • Phase 1 – Planning, Producing a Roadmap and Setting up the Residential Building Safety Division. • Phase 2 – Research, Engagement and Developing the Functions of the Residential Building Safety Division. • Phase 3 – Developing the Functions of the Residential Building Safety Division. • Phase 4 – Next Steps

1.6	<p>Full details and explanations of the Phases can also be accessed at: https://www.communities-ni.gov.uk/publications/roadmap-improving-safety-high-rise-residential-buildings-implementation-ni-expert-panel-report</p> <p><u>Potential Implications for local councils</u></p>		
1.7	<p>The Roadmap recognises that NI is different from other jurisdictions and that certain responsibilities for building safety span across 6 central government departments.</p>		
1.8	<p>Building Control Northern Ireland (BCNI) had representatives on the initial Expert Panel, that took forward collective views of local government Officers on how a Building safety Programme should be designed for Northern Ireland (NI).</p>		
1.9	<p>Potential Implications & Action:</p> <ul style="list-style-type: none"> • BCNI and local Council Building Control Officers will continue to engage with the Department through any proposed/ongoing expert or task and finish groups, to assist in developing the outcomes • It is likely that all councils will engage in a number of consultation process as and when proposals for amendments to legislation comes forward. • It is likely that major changes to Fire Safety will be introduced through the Building Regulations and that the overall process for High Rise Residential Buildings will also have implications and 'new process' for Planning. • Additional training and familiarisation of the amended legislation for Officers. • Technical considerations include the retrospective fitting of smoke and heat alarms in all existing dwellings, mandatory requirement for sprinklers in high rise residential buildings, more than 1 escape stair in high rise residential buildings. • Introduction of a Competency Framework for all those involved with high rise residential buildings <p>The Roadmap Section 4: Conclusion states, 'As our work progresses, we will keep all our stakeholders informed of our progress and significant developments. Finally, we recognise the significant challenge that we face.'</p>		
2.0	<p><u>Recommendation</u></p> <p>It is recommended that Committee notes the Department of Communities Roadmap: Improving Safety in High Rise Residential Buildings.</p>		
3.0	<p><u>Finance and Resource Implications</u></p> <p>There are financial implications for councils in introducing and enforcing any new Regulations and engaging in new process. There is also likely to be a financial implication to align Officers with any new Competency Framework that the Department introduces.</p>		
4.0	<p><u>Equality/Good Relations and Rural Needs Impact Assessments</u></p>		
4.1	<table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Has an equality and good relations screening been carried out?</td> <td style="width: 20%; text-align: center;">No</td> </tr> </table>	Has an equality and good relations screening been carried out?	No
Has an equality and good relations screening been carried out?	No		

4.2	Brief summary of the key issues identified and proposed mitigating actions or rationale why the screening was not carried out Third party/ Central Government Legislation	
4.3	Has a Rural Needs Impact Assessment (RNIA) been completed?	No
4.4	Brief summary of the key issues identified and proposed mitigating actions or rationale why the screening was not carried out. Third party/ Central Government Legislation	

Appendices:	None
--------------------	-------------



Committee:	Environment and Sustainability
Date:	5 June 2024
Report from:	Head of Waste Management & Operations

Item for:	Decision
Subject:	'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI' Consultation Response

1.0	<p><u>Background and Key Issues</u></p> <p>Members were advised at the March 2024 Environment & Sustainability Committee Meeting that the Department of Agriculture, Environment and Rural Affairs (DAERA) were to publish a consultation entitled 'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI' on 7 March 2024.</p> <p>Through this consultation, DAERA are seeking views on proposals aimed at improving the quality and quantity of household and non-household municipal recycling, how to improve reductions in food waste, how to cut landfill rates and how to engage businesses to increase recycling rates. The aim of this consultation is to bring forward new policy options for the DAERA Minister to consider.</p> <p>The closing date for responses was initially 30 May 2024 however to facilitate governance arrangements, DAERA were asked for an extension and agreed to a revised closing date for responses by 5pm on Thursday 27 June 2024.</p> <p>Members were e-mailed details of the consultation and asked to forward any comments for inclusion to the Head of Waste Management & Operations. A Members workshop was also held on 30 April 2024, to help inform the Council response by examining some of the key elements of the consultation and providing Members with an opportunity to provide their input.</p> <p>Given that the aim of this consultation is to bring forward new policy options for the DAERA Minister to consider and that the proposals for household waste collections outlined within the consultation document differ from the kerbside model agreed by Council in January 2023, it was proposed that a robust response be compiled maintaining the assertion that Councils should remain the decision making body in relation to how local services are delivered with DAERA's role being setting criteria/targets to be delivered.</p> <p>The proposed L&CCC response is attached at Appendix 1 W&OS for Members consideration and approval.</p> <p>Work is ongoing to gather evidence to support the Council position to the consultation questions. Members are therefore advised that the draft response may be added to in advance of submission. Any additions will be for the purposes of justifying/evidencing the rationale for responses as per the current draft, but it will not be possible for Members to approve these additions in advance of submission.</p>
2.0	<p><u>Recommendation</u></p> <p>It is recommended that Members:</p> <ul style="list-style-type: none"> • approve the proposed L&CCC response to the 'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI' Consultation.

	<ul style="list-style-type: none"> approve that the draft response may be added to in advance of submission with any additions to be for the purposes of justifying/evidencing the rationale for responses as per the current draft. 	
3.0	<p><u>Finance and Resource Implications</u></p> <p>Until the outcomes of the consultation document are published it is not possible to quantify the scale and scope of the finance and resource implications to the Council. Given the nature of the proposals it is however anticipated that these implications could be substantial.</p>	
4.0	<p><u>Equality/Good Relations and Rural Needs Impact Assessments</u></p>	
4.1	Has an equality and good relations screening been carried out?	No
4.2	<p>Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out</p> <p>This is a response to a third party consultation.</p>	
4.3	Has a Rural Needs Impact Assessment (RNIA) been completed?	No
4.4	<p>Brief summary of the key issues identified and proposed mitigating actions <u>or</u> rationale why the screening was not carried out.</p> <p>This is a response to a third party consultation.</p>	

Appendices:	Appendix 1 W&OS: L&CCC response to the ‘Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI’ Consultation
--------------------	---

Annex A – Questions posed via Citizen Space for consultation.

GENERAL

1. What is your name?

Noeleen O'Malley

2. What is your email address?

Noeleen.omalley@lisburncastlereagh.gov.uk

3. Are you responding to this consultation representing an organisation you work or volunteer for?

Yes. Skip to Question 5.

No

4. You selected "no" to Question 3. This means that you are responding to the consultation as an individual householder/member of public. If this statement does not describe how you wish to respond, please amend your answer to Question 3. If you are happy to proceed, please select Yes. If you select No, the survey process will end.

Yes. I am responding as a householder/member of public. Please proceed to Proposal 1.

No

5. Which category best represents you from the list below?

Category	Please Select
Trade Body (Waste Sector)	
Local Council	x
Local Council Sector Body	
Waste Management Company (Collectors, Sorters, Infrastructure Operators of Treatment Facilities for various streams)	
Reprocessors (End Destination)	
Non-Governmental Organisation (NGO)	
Businesses and Non-Household Municipal (NHM) producing organisations	
Trade Body (representing business sectors)	
Other	

If applicable, please state the name of the organisation you are responding on behalf of.

Lisburn & Castlereagh City Council

Part 1: Proposals to improve commonality in recycling from households

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

1. Do you agree with the proposal to restrict the capacity of residual waste for average households to a maximum of 90 litres per week? Some households may require additional containment or alternative arrangements. See question 6.

- Yes -agree.
- No
- If no, your response should include clear evidence as why residual waste capacity should not be restricted. Evidence with justification to extend timescales should be provided, if appropriate.
- Unsure

While we agree in principle with the restriction of capacity for residual waste we believe it should be left to individual Councils to decide how this restriction is delivered e.g. through bin size and/or frequency of collection.

We also believe this proposal will only be successful if, as well as an agreed weekly capacity for the 'average' household, there is a common set of service standards for households that may require additional containment of residual waste/alternative arrangements e.g. commonality on how many permanent residents would lead to additional capacity, how much this additional capacity would be etc.

2. Some Councils may not be able to restrict the capacity of residual waste by the date proposed (within 24 months of notification of a statutory requirement). In this table we set out some circumstances which may delay changes to residual waste restriction. Please complete the table, providing evidence with justification as to why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for residual waste treatment	N/A
Procurement processes for new containers	x
Manufacturing capacity for new containers	x
Projects outcomes from residual waste reduction action	N/A

Cost burdens	X
Ability to resource & mobilise within the required timescale	X
Other – please describe	Operational roll out of new bins requiring bin delivery and removal on a large scale. There is a limited market for this type of support so if Councils all try to move at once the market may not support a 24 month timeline. Collaborative Change funding offering up to 50% financial support is insufficient to deliver transformational change and well short of financial support packages offered by other regional UK governments.

3. If the proposal to restrict the capacity of residual waste for households is adopted, what is your preference for how this should be delivered? If other, please provide an explanation in the box below.

- 180 litre capacity bins collected fortnightly.
- 240 litre capacity bins collected three weekly.
- Other
- Unsure

If you responded other, please set out your reasons, with clear evidence in the box below.

Lisburn & Castlereagh Council identified a preferred option for harmonisation of household kerbside collections in January 2022 based on 180 litre bins for residual waste a fully comingled mixed dry recycling bin (to include glass) and a comingled food and garden waste collection all to be provided on a fortnightly basis. The preferred approach for restricting residual capacity would however need to be revisited once clarity is obtained on the complete approach to kerbside collections to be recommended and/or legislated for by DAERA. If Council is mandated regarding providing a twin or multi stream collection of dry recycling and/or a weekly collection of food waste this would come at significant additional revenue cost. There may then be a requirement to consider less frequent residual collection as a means of offsetting these costs. While Council is generally supportive of the need to restrict residual capacity there is concern that utilising a reduced frequency collection in order to deliver this will have real issues associated with public acceptability.

In terms of revenue costs, KAT modelling conducted by WRAP on behalf of DAERA show multi stream dry recycling collections significantly increasing collection costs when compared to how services are currently delivered by L&CCC (from a modelled baseline of £5,363,836 to a potential range of £7,449,572 - £8,036,649. If DAERA insist on legislating for a more expensive kerbside collection service that inevitability increases cost via rates increases on L&CCC households revenue funding from central government would need to be available in perpetuity for the increased provision of the new model as a result of any such legislation. (NB L&CCC along with other Councils have expressed concerns with this modelling including the lack of true cost capture especially with respect to transition costs, however we are referencing these figures as produced by WRAP on behalf of DAERA to illustrate concerns with cost differential between different models and to make the point that if DAERA legislate in a way that increases costs to Council there needs to be a way of these costs being funded by central government.)

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. restrict the residual waste capacity for households in Northern Ireland to a maximum of 90 litres per week, but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

4. Do you agree that forms of restricted capacity for residual waste collections should apply to all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin?
- Yes
- No
- Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence, relating to collection of residual waste from communal settings, such as residual waste yields per dwelling per year and learnings or project outcomes from action to reduce residual waste in communal settings.

While in agreement with the principle of restricting residual waste from communal properties the reality of the situation is that this can be difficult to implement as recycling containers often end up used as overflow/defaulto landfill bins if residual capacity is deemed insufficient.

Councils do not have the resources necessary to 'police' communal properties regarding their waste management and many such properties have little or no oversight from management agents/caretakers etc.

While it would be beneficial to have a guideline capacity for such communal properties Council need flexibility to consider local circumstances as being overly proscriptive in this regard could cause unforeseen implications with Councils best placed to use guidelines and their knowledge of local circumstances to come to a position on what residual capacity is suitable for communal type properties.

5. Do you agree that restricted capacity for residual waste collections should be rolled out across NI simultaneously (or as near as possible) to assist local councils with communicating the changes to households?

- Yes
- No
- Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence as to why a staggered roll out is preferable.

Councils acting together delivers a clear message to the public that the need to restrict residual waste is a paradigm shift that is supported through central government and implemented by all Councils at a local level. A collective move would also allow for clear messaging around the need to reduce residual waste and maximise kerbside recycling options for dry recycling and food & garden waste.

Given the potential planning and investment required for such a move it may not be possible for all Councils to 'go live' simultaneously, indeed there may be the need to phase implementation within individual Councils however if roll out is done along similar timelines this would still be of benefit.

6. Do you agree that households who demonstrate that they meet the following criteria could be provided with more than the maximum of 90 litres per household per week?

	Yes agree	No disagree	Unsure
Household comprises more than 6 residents	X L&CCC currently provides additional disposal	If selected, please define the number of citizens in a	

	capacity to households with 6 or more permanent residents	household where exclusions should apply, with evidence to justify your response.		
Households where citizens have medical conditions which produce additional waste, such as produce to manage incontinence	X	If selected, please provide evidence to justify your response.		
Households where there are more than two children using disposable nappies		If households with for example one adult with incontinence related waste qualify for additional capacity there cannot be a stipulation on the number of children in nappies to also qualify for additional capacity. A household with any children in nappies should qualify for additional capacity with this to be kept under review.	X	
All households in the collection subsequent to the Christmas break, where presentation of a restricted amount of side waste is acceptable.		Council cannot collect side waste due to H&S and manual handling considerations. Also fleet and routes are sized based on normal operations and sufficient additional resource would not be available to lift large quantities of additional	X	

		waste on a one off basis. HRC provision is available for such circumstances.		
Other (Please detail). If selected, please provide evidence to justify your response.	Households where a resident is unable to recycle properly due to a medical condition such as dementia.			

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

1. Do you agree that the core set of materials comprising dry recycling collections by councils should comprise as the list below, as a minimum?

	Agree. All items listed in the row should be included	Disagree. All items listed in the row should not be included. Please state which ones and why.	Unsure
Paper and card, including newspaper, cardboard packaging, writing paper etc.	x		
Glass bottles and jars – including drinks bottles, condiment bottles, jars, etc. and their metal lids	x		
Metal packaging: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes	x		
Plastic: bottles including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays; plus cartons (such as Tetrapak®)	x		

2. Do you agree with our proposal that will require the kerbside collection of the core set of dry recyclables within 24 months of notification of a statutory requirement?
 Yes

- No - If no**, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.
- Unsure

This would be dependent on contractual arrangements being able to facilitate addition of materials not included in current collections or timing of new contracts required to include any additional materials or materials collected in a different way from current practice.

Depending on the scale of changes at kerbside Council may also put in place a phased implementation programme to allow proper management of any changes which again may not be compatible with a 24-month timeframe.

3. Some Councils may not be able to collect the core set of dry recyclables by the date proposed. In the table below we set out some circumstances which may delay changes to recycling collections. Please provide evidence with justification why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for dry recyclable collection	X
Sorting or reprocessing	N/A
Procurement processes for new containers or vehicles	X
Manufacturing capacity for new containers or vehicles	X
MRF infrastructure or capacity	X
Container distribution	X
End Market volatility/lack of end markets	X
Other – please describe	Operational roll out of new bins requiring bin delivery and removal on a large scale. There is a limited market for this type of support so if Councils all try to move at once the market may not support a 24-month timeline. Collaborative Change funding offering up to 50% financial support is insufficient to deliver transformational change and well short of financial support packages offered by other regional UK governments.

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

1. As plastic films will need to be added to the core set of dry recyclables by no later than 31st March 2027, please state how you propose plastic films should be collected at the kerbside, ensuring quality and quantity of other dry recyclables.

Select one of the options below (tick box)

- Collected as a separate stream from all other recyclables, and from residual waste i.e., in a dedicated bag or container,
- Collected in a container alongside other plastics – bottles, pots, tubs, and trays,
- Collected mixed with other dry recyclables in the same container,
- Unsure
- Other (please detail and explain your reasoning for this proposal with supporting evidence)

Given implementation of pEPR has already been delayed by 12 months this has restricted Councils, MRF's and reprocessors ability to forward plan for introduction of soft plastics into collections. Lack of certainty around finances, assessments of efficient and effective collections and if/when business packaging will come into scope of pEPR are some of the factors that have made forward planning difficult.

The FPF FlexCollect Project has however shown that collection of flexible plastics can be delivered in both kerbside sort and comingled collections through the use of single use plastic bags to bulk together flexible plastics. They are also hoping to trial loose collections. These trials will depend on participation of MRFs and the availability of sustainable end destinations for the collected plastic to be reprocessed.

Issues exist regarding ink levels on plastic films and the need for further sorting between different plastic film types in order to gain the maximum economic benefit from the material at reprocessors. These issues including the additional factor of N.Ireland's lack of proximity to reprocessors exist no matter what system is chosen for collecting the flexible films.

2. Collecting plastic films by the 31st March 2027 may be challenging for some Councils. In this table we set out some circumstances which could affect a Council's ability to collect plastic film by this date. Please provide evidence with justification detailing why this timescale will be challenging.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for plastic film collection	X
Sorting or reprocessing	X
Procurement processes for new containers or vehicles	X
Manufacturing capacity for new containers or vehicles	X
MRF infrastructure or capacity	X
Container distribution	X

End Market volatility/lack of end markets	x
Factors relevant to collections from flats and houses in multiple occupation, where citizens share communal containers	x
Other – please describe	<p>X Distance from potential reprocessing markets, NI is remote from potential reprocessing markets and is unlikely to generate a critical mass of this material significant enough to encourage local reprocessing facilities to be developed.</p> <p>Delayed implementation of pEPR leading to lack of certainty regarding payment for plastic packaging and restricting ability to forward plan for introduction of this material into material sorting contracts.</p> <p>Cost for provision and distribution of 'survival bags' to facilitate collections. There needs to be certainty that any such costs will be fully covered by pEPR payments.</p>

3. Do you agree that the list of materials to be collected as a minimum by councils should be regularly reviewed, and providing certain conditions met, expanded?

- Yes
 No
 Unsure

If you disagree with this proposal then please provide the reason for your response below with clear evidence on why you do not agree with regular reviews of the minimum list and why the list should not be expanded, provided certain conditions are met.

Implementation of any changes to the core set of materials following a review period would need to take into account operational and contractual constraints. There would also need to be a process that allows Council input into such reviews to allow the impact of adding additional materials into collections to be properly articulated.

A situation whereby Councils are dictated to and mandated to collect additional core materials would need to be avoided.

Consideration would also need to be given as to how any additional costs for collection of additional core materials would be offset e.g. through a producer compliance scheme such as that due to be introduced for packaging materials with no changes to core materials made until funding sources were in place to cover any costs.

4. If the proposal for a minimum list of materials to be collected for dry recycling were to be adopted and regularly reviewed, do you agree that the frequency of review should be every two years.

- Yes
 No
 Unsure

If you answered "No," then please provide the reason for your response below. Your response should include clear evidence as to what frequency of review would be more appropriate.

Implementation of any changes to the core set of materials following a review period would need to align with contractual arrangements therefore while an arbitrary review period could be agreed there would need to be flexibility for implementation of changes following review to take into account operational and contractual constraints.

Councils are likely to seek certainty and stability through longer term MRF sorting/processing contracts so a 2-year review period is unlikely to be compatible with the duration of such contracts.

Consideration would also need to be given as to how any additional costs for collection of additional core materials would be offset e.g. through a producer compliance scheme such as that due to be introduced for packaging materials, with implementation timelines aligned to the availability of funding.

5. What, if any products or materials do you consider should be also included in the core list of materials to be collected by councils? Please provide your response in the box below as to why the list should include the material (s).

Councils cannot be expected to facilitate collection of ever-increasing types of waste for recycling without consideration being given as to how covering the additional costs of collection and processing is to be facilitated.

6. Do you agree that the materials comprising the items below should be *excluded* currently from the minimum list of materials for collection by councils within dry recycling collections?

Type	Examples	Agree. Items listed in the row should be excluded from recycling	Disagree. Items listed in the row should <u>be included</u> for recycling. Please state which items should be included and why	Unsure
Glass	Ceramics, for example crockery, earthenware Drinking glasses Flat glass Glass cookware including Pyrex® Light bulbs and tubes Microwave plates Mirrors Vases Window glass	x		
Metal	Laminated foil, for example pet food pouches, coffee pouches General kitchenware, for example cutlery, pots, and pans Any other metal items, for example kettles, irons, pipes, white goods	x		
Plastic	Any plastic packaging or non-packaging items labelled as “compostable” or “biodegradable” (including but not limited to coffee pods and cutlery) with the exception of food waste caddy liners in food waste recycling collections Plastic pouches with laminated foil layer for	x		

	<p>example pet food pouches, coffee pouches</p> <p>Plastic bottles containing white spirits, paints, engine oils and anti-freeze</p> <p>Bulky rigid plastics such as garden furniture, bins, and plastic toys</p> <p>Polystyrene (expanded and high impact)</p> <p>Polyvinyl chloride (PVC) packaging</p>			
Paper and card	<p>Absorbent hygiene products (AHPs) including nappies, period products and incontinence items</p> <p>Cotton wool, make up pads</p> <p>Tissue/toilet paper</p> <p>Wet wipes for example for nappy changing times, kitchen/ bathroom cleaning</p>	x		
Any other items – please state which items and why they should be specifically excluded from recycling	<p>While reference is often made to the kerbside collection of household batteries, in recent years this material has in fact been removed from kerbside collections, even those operated on a kerbside sort system. This is due to concerns around fire risks and associated insurance issues. Council would therefore feel it is unlikely that batteries could be considered for collection at kerbside.</p>			

7. Do you agree that the core list of materials in the dry recycling stream should apply to all households, including flats and houses in multiple occupation, where citizens share communal containers?

- Yes
- No
- Unsure

If you disagree with this proposal, please provide the reason for your response below. Your response should include clear evidence, relating to issues with collection of named materials from communal settings such as containment, contamination, engagement with citizens.

We agree that the core list of materials in the dry recycling stream should apply to all households including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin however we also recognise potential issues with communal bin use, including contamination and believe Council need to be able to retain the right to remove bins that become an ongoing, repeated source of contamination.

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

1. Do you agree with our proposal that the term QualiTEE should be used to describe the process of determining if there may be an exception to collecting dry recyclable materials separately?
 - Yes
 - No - If no, your response should include clear evidence as to why the term QualiTEE is not your preference. Evidence with justification for alternative terminology should be provided.

□ Unsure

Reference is made to NI's unique legislation on the quality of dry recyclable materials within the context of exemptions to collecting dry recyclable materials separately. Yet no reference is made to:

- Many NI Councils already operate comingled systems and achieve high recycling rates through these collections.
- There is a lack of an agreed definition on what is meant by quality. While DAERA seem to have come to a position that only those materials collected through 'kerbside sort' type collection systems deliver quality there is another school of thought in this regard. Investment in developing MRF infrastructure and technology to service a comingled collection can achieve separation of dry recyclables that result in material of a suitable quality to be recycled therefore delivering the desired recycling outcome utilising a collection methodology that is well established across Northern Ireland. This will reduce the need for capital investment in new vehicles and containers. When DAERA reference comparable quality there needs to be recognition that any item that is suitable for recycling should be considered to be of an acceptable 'quality' and therefore any item that is reprocessed through a recognised end user should be deemed 'comparable quality' irrespective of how it was collected from kerbside.
- Potential of capacity within NI and the UK to process material collected for recycling currently. There is an expressed desire in the consultation document to increase closed loop recycling in order to achieve environmental and economic benefits. *The collaborative network established by a number of NI re-processors currently has a demand for materials from local authority household waste recycling collections. However, for two of the top three NI re-processors, their capacity to re-process the total materials produced from the NI household waste is very limited, Huhtamaki can re-process only 19% of the total paper produced and Cherry Plastics only 18% of the specific plastics they require. The remainder has to be transported to the UK or further afield. All of the materials collected are a resource in both the local and global markets and should be treated as a local and global commodity. Many of the materials collected have no re-processors in NI so there is no closed loop option but we understand that the SIB are considering the promotion of these business opportunities. This area requires substantial development and investment in order improve the NI Circular Economy.*

A memo produced by Re-Gen a commercial operator of a dry recycling MRF in Northern Ireland, in response to a presentation made to the APG Climate Action Group Meeting on 3 May 2024 by Keep Recycling Local maintains their process has comparable and better-quality output material for paper, plastic and other materials and they also sell glass to both the UK and Belgium where it is reprocessed back to bottle at a rate of 85%. Regen also ascertains that a £30 million spend on glass plant in Northern Ireland could achieve better recycling locally as an alternative option to the costly introduction of kerbside sort collections. There is a question as to why these types of proposals have not been considered by DAERA and presented as alternatives within the consultation document.

Simpler recycling proposals in England will see new exemptions to make sure that waste collectors will be able to collect dry recyclables together in the same container, bring in a more convenient and practical system which prevents councils and residents from being hit with more complex collection systems, while making sure all local authorities collect the required recyclable waste streams: glass; metal; plastic; paper and card; food waste; and garden waste.

In the Government response to the 'Consistency in household and business recycling in England' Consultation it is stated "we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials." Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards requiring implementation of a minimum three stream collection with respondents being asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.

The updated Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England confirms "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We believe that that similar exemptions should be introduced in Northern Ireland rather than the imposition of the proposed QualiTEE assessment. It seems irrational that one collection method is deemed acceptable in a region of the UK with Government in N.Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers to deliver acceptable quality dry recyclables for end markets.

There is a danger of NI 'gold plating' collections, resulting in higher costs to Councils and therefore local ratepayers. While arguments can be made regarding higher resale value of materials collected for recycling through multi stream collections this may not always be the case. Recycling markets can be volatile and it is unlikely, especially in the short to medium term that local reprocessing markets will exist for all source segregated materials. If all Councils were to move to a source segregated collection it is also unclear if these commodities would always attract a significant enhanced income under the principles of supply and demand.

There is also a question concerning the as yet undefined concept of 'efficient and effective' collections within pEPR, the link to payment mechanisms and how any sort of level playing field can be established if Northern Ireland adopts a 'QualiTEE' definition that is in excess of what other UK Councils would be required to achieve.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

DAERA have referenced consultation with Councils prior to publication of this consultation document. The consultation does not however reflect concerns Councils raised around proposals for dry recycling during these discussions. Additionally, the concept of QualiTEE did not form part of these discussions.

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

1. As per the default position do you agree that councils should be required to collect “multi-stream,” with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection?
- Yes
- No
- Unsure

If you disagree with this proposal, then please provide the reason for your response below. Ideally, your response should include clear evidence of how recyclables streams can be successfully collected including methods to preserve quality for recycling, the quantities and proportions of materials sent for recycling, both for closed and open loop processing.

Council references in its entirety our response to Proposal 4 Q1 as being applicable in response to this question and submit this in response to this question also.

Council does not agree with the default position that councils should be required to collect “multi-stream,” with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

In the Government response to the ‘Consistency in household and business recycling in England’ Consultation it is stated “we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of ‘household waste’ recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials.” Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards a predetermined outcome i.e. requiring implementation of a minimum three stream collection with respondents being asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.

2. Do you agree with our proposal that will require the core set of dry recyclables to be collected separately from each other in the dry recycling collection (i.e., multi-stream) within 24 months of notification of a statutory requirement and/ or notification of Extended Producer Responsibility funding allocation?
- Yes

- No
 Unsure

If you disagree with this proposal, then please provide the reason for your response below. Your response should include clear evidence as to why the dry recyclables cannot be collected separately from each other within the proposed timeframe. Evidence with justification to extend timescales should be provided, if appropriate.

Council references in its entirety our response to Proposal 4 Q1 as being applicable in response to this question and submit this in response to this question also.

Council does not agree with the default position that councils should be required to collect "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

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

- Where councils cannot collect each dry recyclable waste stream separately, do you agree that the council should produce a written assessment and make available to the NI Environment Agency to outline the exception (s) to the requirement, on the basis of Comparable Quality, Technical Feasibility, Economic Costs and Environmental Outcomes (QualiTEE).

Yes
 No
 Unsure

If you disagree with this proposal, then please provide the reason for your response below.

Council references our response to Proposal 4 Q1 as being applicable in response to this question and submit this in response to this question also.

Simpler recycling proposals in England will see new exemptions to make sure that waste collectors will be able to collect dry recyclables together in the same container bring in a more convenient and practical system which prevents councils from being hit with extra complexity, while making sure all local authorities collect the required recyclable waste streams: glass; metal; plastic; paper and card; food waste; and garden waste.

In the Government response to the Consistency in household and business recycling in England Consultation it is stated “we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of ‘household waste’ recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials.”

It seems perverse that one collection method is deemed acceptable in a region of the UK with Government in N Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers delivering acceptable quality dry recyclables for end markets.

Council is unclear as to what is meant by “the council should produce a written assessment and make available to the NI Environment Agency”. Is this inferring that before any changes would be made to Council collection systems NIEA would need to be provided with a written assessment of the Council proposals to approve? This proposal is vague and does not provide enough detail on what status such a written assessment would have, if NIEA would have to ‘approve’ proposals and any mechanism for appeal in the event of a disagreement between Council analysis and that of NIEA officials.

Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.

2. Where councils cannot collect the dry recyclable waste streams separately, do you agree that the council should provide a written assessment based on the template shown in Appendix 2 to outline the exception (s) to the requirement?
- Yes
 - No – further content should be added.
 - No – content should be removed.
 - Unsure

If you disagree with this proposal then please provide the reason for your response below, including your suggested amendments to the template.

Council references our response to Proposal 4 Q1 as being applicable in response to this question and submit this in response to this question also.

Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling, but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.

3. Do you agree or disagree with the recommendation that Councils should review and re-submit written assessments at least every 7 years?

- Yes
 No
 Unsure

If you disagree, please select one of the following statements that best describes why:

- Revising written assessments every 7 years is too frequent (please state how frequently you think they should be revised and evidence why)
 Revising written assessments at least every 7 years is too infrequent please state how frequently you think they should be revised and evidence why)
 Other (please detail)

Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling, but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.

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

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

1. In terms of disproportionate economic costs, to demonstrate if there is an excessive cost to collect recyclable waste in separate waste streams, do you agree that the following factors should be provided and evidenced by the council:

Factors	Yes agree	No disagree. If you disagree, please provide information as to why you disagree, providing clear evidence of why the factors should be included/ excluded.	Unsure
Gate fees and material income		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	

<p>Salaries and staff numbers - including supervision</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Container costs, numbers, and replacements</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	

<p>Vehicle types, costs, finance, depreciation, hire, running costs</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Quantities of materials collected, frequency of collection</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling, but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	

<p>Associated overheads including depot costs</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Contract length, penalties associated with variations</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling, but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Other (please detail)</p>	<p>There is little to no reference to H&S</p>		

	<p>issues throughout the consultation document which is concerning.</p> <p>The proposed four-stream approach can only be implemented via a kerbside sort system, which comes with significant health and safety implications for employees in relation to manual handling and repetitive strain injuries.</p> <p>In terms of revenue costs, KAT modelling conducted by WRAP on behalf of DAERA show multi stream dry recycling collections significantly increasing collection costs when compared to how services are currently delivered by L&CCC (from a modelled baseline of £5,363,836 to a potential range of £7,449,572 - £8,036,649. If DAERA insist on legislating for a more expensive kerbside collection service that inevitability increases cost via rates increases on L&CCC households revenue funding from central government would need to be available in perpetuity for the increased provision of the new model as a result of any such legislation. (NB L&CCC along with other Councils have expressed concerns with this modelling including the lack of true cost capture especially</p>		
--	--	--	--

	<p>with respect to transition costs, however we are referencing these figures as produced by WRAP on behalf of DAERA to illustrate concerns with cost differential between different models and to make the point that if DAERA legislate in a way that increases costs to Council there needs to be a way of these costs being funded by central government.)</p>		
--	--	--	--

2. Do you agree that the following factors should be considered when evaluating economic costs:

Factors	Yes agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Adverse environmental costs		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling, but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is</p>	

<p>Adverse health impacts</p>		<p>creating nugatory work to no additional benefit.</p> <p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Potential for efficiency improvements</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	

<p>Revenues from sales of secondary raw materials</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Application of the polluter pays principle</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	

<p>Application of Extended Producer Responsibility</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.</p> <p>Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Other – please detail</p>	<p>In terms of revenue costs, KAT modelling conducted by WRAP on behalf of DAERA show multi stream dry recycling collections significantly increasing collection costs when compared to how services are currently delivered by L&CCC (from a modelled baseline of £5,363,836 to a potential range of £7,449,572 - £8,036,649. If DAERA insist on legislating for a more expensive kerbside collection service that inevitability increases cost via rates increases on L&CCC households revenue funding from central government would need to be available in perpetuity for the increased provision of the new model as a result of any such legislation. (NB L&CCC along with other Councils have expressed concerns with this modelling including the lack of true cost capture especially with respect</p>		

	<p>to transition costs, however we are referencing these figures as produced by WRAP on behalf of DAERA to illustrate concerns with cost differential between different models and to make the point that if DAERA legislate in a way that increases costs to Council there needs to be a way of these costs being funded by central government.)</p>		
--	---	--	--

3. Do you agree that economic costs could be considered to be disproportionately excessive on a method of calculating an average cost per household deviation from a standard separate collection system cost?

- Yes
- No
- Unsure

If no, please provide information as to why you disagree, providing clear examples of alternative approaches to define excessive cost differences between systems, including a value you consider appropriate to differentiate economic impacts.

Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.

In terms of revenue costs, KAT modelling conducted by WRAP on behalf of DAERA show multi stream dry recycling collections significantly increasing collection costs when compared to how services are currently delivered by L&CCC (from a modelled baseline of £5,363,836 to a potential range of £7,449,572 - £8,036,649. If DAERA insist on legislating for a more expensive kerbside collection service that inevitability increases cost via rates increases on L&CCC households revenue funding from central government would need to be available in perpetuity for the increased provision of the new model as a result of any such legislation. (NB L&CCC along with other Councils have expressed concerns with this modelling including the lack of true cost capture especially with respect to transition costs, however we are referencing these figures as produced by WRAP on behalf of DAERA to illustrate concerns with cost differential between different models and to make the point that if DAERA legislate in a way that increases costs to Council there needs to be a way of these costs being funded by central government.)

4. Please detail examples of technical challenges, with any supporting evidence, which you believe demonstrate that a separate collection of dry recyclables will not be feasible in circumstances for some or all properties.

In the consultation document DAERA have said they do not consider people or historical preferences to be within scope of 'technically feasible'. Council holds a completely opposite view to this. Council delivers services to local ratepayers and as such is duty bound to take into consideration feedback from these ratepayers when designing and delivering services.

Section 75 of the NI Act 1998 requires public authorities to comply with two statutory duties in relation to Equality. Council has a duty to conduct Equality Impact Assessments and Rural Needs Analysis in relation to new projects or policies and therefore cannot rule out 'people' within a category of technical feasibility.

Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

That notwithstanding, technical issues exist that would prevent the separate collection of dry recyclables including the following:

- Space to store containers
- Service provision in isolated rural properties
- Lack of containers that are weather proof enough to be presented at kerbside for collection in windy/exposed areas
- Current wheelie box system used for kerb sort type collections presenting difficulties for the elderly and those with a disability to use e.g. bending down to access bottom box, using access apertures on boxes etc.
- Unsuitability of separate collection for commercial type properties preventing a harmonised service delivery model for Council commercial customers.

LCCC launched an 8 week residents recycling consultation in July 2021 asking for their views on the preferred way of collecting recyclables from kerbside. We received 3,314 responses. Some of the questions asked about the resident's current service and others about future kerbside collections. 47% of the total responses were received from areas serviced by both kerbie box and wheelie boxes and the remaining 53% were from areas serviced by recycling bins.

In connection with a question asking if the resident has any difficulties using, moving or storing their current container, 64% of those with a kerbie box and 24% with a wheelie box answered "yes", but only 4% of residents with a recycling bin answered "yes".

A further question asking which collection option the resident would prefer to be provided by LCCC resulted in 33% preferring a wheelie box and 67% preferring a recycling bin.

All of the above answers show clear preferences which support the need for a high participation by residents and ease of use.

5. In order to make the case that separate collection does not deliver the best Environmental Outcome-compared to the collection of recyclable waste streams

together, do you agree that the overall impact of the management of the household waste stream evidence should be provided on the measures listed but not limited to the following:

Measures	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Quantities of materials collected;		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent. Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
Quantities of materials classed as contamination and not recycled;		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent. Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an</p>	

		additional assessment is creating nugatory work to no additional benefit.	
Quantities of materials lost from sorting processes at a MRF;		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent. Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
Vehicle emissions from collection rounds;		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent. Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas;		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Council maintains that DAERA should establish a set of criteria for</p>	

		<p>Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Emissions from disposal/ treatment including savings arising from landfill diversion; and</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p>	
<p>Carbon savings from using recycled materials rather than virgin materials</p>		<p>Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other. Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be</p>	

		<p>delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.</p> <p>Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.</p> <p>Carbon savings from using recycled materials rather than virgin materials are not relevant to the model used to collect the waste streams. While it is important to consider how materials will be used after collection and their environmental impact this is an emissions calculation relevant to producers rather than local authorities collecting the materials. Carbon savings from the specific sorting/reprocessing plants available for use for each of the modelled scenarios should be considered instead.</p>	
<p>Other factor to be added – please describe</p>		<p>Emissions from required replacement of waste receptacles for both production of new containers and disposal of old containers (prior to their normal expected lifespan) to facilitate a separate collection compared to a collection of recyclable waste streams together should be measured.</p> <p>Emissions from required replacement of recycling collection vehicles for both the production of new vehicles and the disposal of redundant vehicles (prior to their normal expected lifespan) to facilitate a separate collection compared to a collection of recyclable waste streams together should be measured. Consideration should be given to alternative low emissions fleet models moving forward.</p>	

6. Do you agree that the following evidence factors should be provided by a Council to demonstrate that materials are of comparable quality.

Evidence Factors	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
<p>Comparable quantities (+/-2%) of each material stream sent for closed loop recycling</p>		<p>There is a lack of an agreed definition on what is meant by quality. While DAERA seem to have come to a position, that only those materials collected through 'kerbside sort' type collection systems deliver quality there is another school of thought in this regard. Investment in developing MRF infrastructure and technology to service a commingled collection can achieve separation of dry recyclables that result in material of a suitable quality to be recycled therefore delivering the desired recycling outcome utilising a collection methodology that is well established across Northern Ireland. This will</p>	

		<p>reduce the need for capital investment in new vehicles and containers.</p> <p>This proposal also seems to infer that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. No evidence has been provided that if all Councils were to move to such a collection methodology then the end destinations utilised would deliver more closed loop recycling. In fact, it could lead to saturation of existing markets.</p> <p>Councils ultimately provide collection services with materials delivered to MRFs from which they are sorted and marketed to end destinations for reprocessing. Council maintains this is an issue for MRF operators to offer solutions in order to deliver quality recycling to either Open or Closed loop destinations based on market conditions.</p> <p>A memo produced by Re-Gen a commercial operator of a dry recycling MRF in Northern Ireland, in response to a presentation made to the APG Climate Action Group Meeting on 3 May 2024 by Keep Recycling Local maintains their process has comparable and better-quality output material for paper, plastic and other materials and they also sell glass to both the UK and Belgium where it is reprocessed back to bottle at a rate of 85%. Regen also ascertains that a £30 million spend on glass plant in Northern Ireland could achieve better recycling locally as an alternative option to the costly introduction of kerbside sort collections. There is a question as to why these types of proposals have not been considered by DAERA and presented as alternatives within the consultation document.</p> <p>In addition, where a MRF facility is shared by a number of Councils the proportion of materials that go to an open or closed loop end destination are facility averages and therefore not representative of the actual quantity/quality of material collected by individual Councils.</p>	
<p>Comparable quantities (+/- 5%) of each material stream sent for open loop recycling</p>		<p>There is a lack of an agreed definition on what is meant by quality. While DAERA seem to have come to a position, that only those materials collected through 'kerbside sort' type collection systems deliver quality there is another school of thought in this regard. Investment in developing MRF infrastructure</p>	

	<p>and technology to service a commingled collection can achieve separation of dry recyclables that result in material of a suitable quality to be recycled therefore delivering the desired recycling outcome utilising a collection methodology that is well established across Northern Ireland. This will reduce the need for capital investment in new vehicles and containers.</p> <p>This proposal also seems to infer that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. No evidence has been provided that if all Councils were to move to such a collection methodology then the end destinations utilised would deliver more closed loop recycling. In fact, it could lead to saturation of existing markets.</p> <p>Councils ultimately provide collection services with materials delivered to MRFs from which they are sorted and marketed to end destinations for reprocessing. Council maintains this is an issue for MRF operators to offer solutions in order to deliver quality recycling to either Open or Closed loop destinations based on market conditions.</p> <p>A memo produced by Re-Gen a commercial operator of a dry recycling MRF in Northern Ireland, in response to a presentation made to the APG Climate Action Group Meeting on 3 May 2024 by Keep Recycling Local maintains their process has comparable and better-quality output material for paper, plastic and other materials and they also sell glass to both the UK and Belgium where it is reprocessed back to bottle at a rate of 85%. Regen also ascertains that a £30 million spend on glass plant in Northern Ireland could achieve better recycling locally as an alternative option to the costly introduction of kerbside sort collections. There is a question as to why these types of proposals have not been considered by DAERA and presented as alternatives within the consultation document.</p> <p>In addition, where a MRF facility is shared by a number of Councils the proportion of materials that go to an open or closed loop end destination are facility averages and therefore not representative of the actual quantity/quality of material collected by individual Councils.</p>	
--	--	--

Other factor to be added – please describe	
--	--

7. Do you agree standard default values and data that have clearly referenced sources (that cover comparable Quality of materials, Environmental outcomes, Technical feasibility or Economic Costs) which could be used to support a written assessment, would be useful?

- Yes
 No
 Unsure

If you disagree, please provide the reason for your response.

Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

Any significant changes to kerbside collections within Councils would generally entail a detailed options appraisal and associated business case, which would include an analysis of economic, environmental and technical viability. Adding an additional assessment is creating nugatory work to no additional benefit.

Standard default values in relation to environmental outcomes (specifically carbon) will be based on averages that may not provide an accurate representation of the carbon impact of the plants that local authorities are sending their waste to.

Carbon WARM states 'While the factors contained herein represent the best available information on greenhouse gas emissions for waste management options in the UK, the data are subject to uncertainty and are based on averages. They may not reflect specific facilities or other activities (e.g. a process powered solely by renewable energy). The results should be regarded as indicative of the relative impacts of waste treatment options, rather than as a precise carbon footprint. Care should be taken not to model scenarios that produce a spurious conclusion. For example, when modelling energy from waste, account should be taken of the required fuel mix for an EfW facility, as opposed to picking materials based purely on relative emissions'.

Standard default values would be useful if they are specific to Northern Ireland and represent the collections rounds and technologies available here, rather than being based on averages from England or elsewhere.

8. Do you agree with the principle that MRFs in NI should follow the same input and output sampling guidance used as part of Environmental Permitting Regulations in England and Wales?
- Yes
 - No
 - Unsure**
 - If no, your response should include clear evidence as to why similar sampling protocols to England and Wales should not be followed in NI?

Consideration needs to be given to the cost/benefit of such sampling, if these costs are to be covered by EPR payments etc.

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

1. Which of the following options are your most preferred scenarios concerning the mixing of materials? Please rank the following options 1 (most preferred) to 4 (least preferred). If you consider that some options are not viable, please do not include these in your ranking, in which case, please rank only one, two or three option(s). Please focus on comparable quality of materials, rather than economic costs or technical feasibility of collections. You will note that we have set out clearly in the options which streams are separate, and which are mixed. If you are not sure or have no preference, please skip this question.

Options	Ranking (1 – most preferred; 4 - least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence in support of your selection for this ranking
<p>Option A – “three stream”</p> <ul style="list-style-type: none"> • Separate stream of glass bottles & jars; with • Separate stream of paper & card; with • Mixed stream of: metal packaging and plastics bottles, tubs, and trays 	4	Refer to Option D below as improvements in MRF technology can provide quality recyclates adequate for the re-processors rather than this option which has a high operational cost, significant health & safety collection challenges and is not favoured by residents with a lower participation.
<p>Option B – “two stream: fibres out”</p>	2/3	Refer to Option D below as improvements in MRF technology can provide

Options	Ranking (1 – most preferred; 4 - least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence in support of your selection for this ranking
<ul style="list-style-type: none"> Separate stream of paper & card; with Mixed stream of: metal packaging, plastic bottles, tubs and trays and glass bottles & jars 		quality recyclates adequate for the re-processors rather than this option.
<p>Option C – “two stream: glass out”</p> <ul style="list-style-type: none"> Separate stream of glass bottles and jars; with Mixed stream of: metal packaging, plastics bottles, pots & trays, and paper & card 	2/3	Refer to Option D below as improvements in MRF technology can provide quality recyclates adequate for the re-processors rather than this option.
<p>Option D –“fully co-mingled”</p> <ul style="list-style-type: none"> Mixed stream of: metal packaging plastics bottles, pots, tubs & trays, paper, card, and glass bottles & jars 	1	We have engaged a specialist waste consultant to investigate and advise on kerbside collection options taking into account all of the current legislation and regulations. Any collection method and processing post collection should aim to produce recyclates that are of a quality that will meet the needs of end processors. The Resource Association are one method to determine the quality of the recyclates produced but there are others. There are currently two methods in NI for producing quality recyclable materials for end markets, either kerbside sort and a baling station or comingling collection and MRF processing. Technology has significantly advanced in the MRF development and a well invested MRF now has the ability to create quality recyclable materials for end

Options	Ranking (1 – most preferred; 4 - least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence in support of your selection for this ranking
		<p>markets through the use of optical sorting and artificial intelligence creating a very pure segregated material. Three of the main re-processors in NI, Huhtamaki, Cherry Plastics and Encirc accept materials from both collection systems. Our aim is to maximise the residents participation in recycling and minimise the residual waste generated. Our surveys have shown that our residents much prefer a comingled bin collection service and are more likely to comply compared to a kerbside sort system. If an advanced MRF can produce quality recyclates suitable for the re-processors, then the materials are both a local and global commodity. The Council cannot guarantee the provision of material to specific re-processors as doing so would be disregarding market forces with associated cost implications.</p>

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

- Do you agree that Councils may have an exemption from the regulations where they mix plastics and metals, thus should not be required to prepare a written assessment to seek an exception from the regulations where these two materials are collected together? Note that a Council may still select to collect these recyclable waste streams as separate materials.
 - Yes
 - No – all material streams should be collected separately.
 - No – more mixing of materials should be permissible.
 - Unsure

If you answered no, please provide information as to why you disagree, providing clear evidence as to why you consider all material streams should be collected separately, or more mixing should be permissible.

Council is not supportive of a requirement to provide any form of written assessment in relation to not collecting dry recyclable streams separately from each other.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

Council would also argue if DAERA are prepared to facilitate an exemption from the regulations to allow the mixing of plastics and metals that such exemptions should be extended to permit all of the core materials to be collected together in a comingled kerbside collection.

2. What, other exemptions would you propose to the requirement to collect the recyclable waste streams separately, where it would not significantly reduce the potential for recycling? Please provide your evidence in the box below.

Council is not supportive of a requirement to collect recyclable waste streams separately from each other or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for Councils to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils as to how this can be best delivered in their area. Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

Council would also argue if DAERA are prepared to facilitate an exemption from the regulations to allow the mixing of plastics and metals that such exemptions should be extended to permit all of the core materials to be collected together in a comingled kerbside collection.

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

1. We have listed possible collection methods for food waste from kerbside properties below, some of which we consider are suitable short term. How would you rank the following options for food waste collections, where 1 is most

preferred and 4 is least preferable? If you consider that some options are not viable, please do not include these in your ranking, in which case, please rank only one, two or three option(s).

Options	Ranking (1 – most preferred; 4 - least preferred). Leave blank for option(s) you consider are not viable	Please provide clear evidence or statements in support of your preferred selection for your ranking
A separate weekly collection of food waste with additional arrangements for garden waste		
A weekly mixed food and garden waste collection.		
A separate fortnightly collection of food waste with additional arrangements for garden waste.		
A fortnightly mixed food and garden waste collection.	1	<p>No assessment on the requirement for weekly separate food waste collections should be made until such time as the impact of restricting residual waste collections can be measured in relation to moving food waste away from residual waste bins into existing comingled food and garden waste bins.</p> <p>Council is not convinced of the need for weekly separate food waste collections with preference for greater diversion of food waste through restricting residual waste capacity at kerbside and robust communication methods making it clear that no household in Northern Ireland should dispose of any food waste via their residual waste collection service.</p>
Other – please detail		

If DAERA insist on legislating for a more expensive kerbside collection service, such as the weekly collection of separately collected food waste, that inevitably increases cost via rates increases on L&CCC households, revenue funding from central government would need to be available in perpetuity for the increased cost provision of the new model as a result of any such legislation.

2. Do you agree with our proposal that all kerbside properties should in future have access to a least a weekly collection for food waste to increase capture rates of food waste?

- Yes
- No
- unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

No assessment on the requirement for weekly separate food waste collections should be made until such time as the impact of restricting residual waste collections can be measured in relation to moving food waste away from residual waste bins into existing comingled food and garden waste bins.

Householders in Northern Ireland already have access to a regular collection of food waste via fortnightly comingled food and garden waste collections. Provision of a weekly separate food collection would come at significant additional cost, especially for councils that do not implement RRV type weekly dry recycling collections.

If mandated to offer a weekly food waste collection Councils will be forced to look for operational savings elsewhere to offset the additional cost of provision of this service. The first likely saving could be removal of long established garden waste collections currently provided alongside food waste collection via a 240 litre bin collected in a fortnightly cycle. This could then perversely have a negative impact on recycling rates and would be a difficult message to sell to the general public who would perceive this as a reduction in the service level currently provided.

Lack of potential to treat garden waste collected at kerbside at lower cost garden waste only rate also needs to be taken into account. Comingled food and garden waste collections are so entrenched it is unlikely that all householders would stop putting food in with garden waste therefore this material would continue to need to be treated as containing food.

Council is not convinced of the need for weekly separate food waste collections with preference for greater diversion of food waste through restricting residual waste capacity at kerbside and robust communication methods making it clear that no household in Northern Ireland should dispose of any food waste via their residual waste collection service. If DAERA insist on legislating for a more expensive kerbside collection service, such as the weekly collection of separately collected food waste, that inevitability increases cost via rates increases on L&CCC households revenue funding from central government would need to be available in perpetuity for the increased provision of the new model as a result of any such legislation.

Council is also in a long-term contract for the in-vessel composting of comingled food & garden waste and is not convinced that AD infrastructure within Northern Ireland is suitably developed and capable of treating all household food waste were it to be collected separately.

DAERA also need to consider if stipulation of AD as a treatment technology could be perceived as unfairly distorting the free market for service providers to come up with suitable treatment solutions for compostable materials and as such would be subject to legal challenge e.g. from in vessel composting businesses.

Consideration should be given to the emissions generated from the weekly collection of food waste compared to a fortnightly collection of mixed food and garden waste, particularly when contracts are in place until 2029 and the collected food waste would still be disposed of alongside garden waste.

3. Do you agree that all households, including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin should have access to at least a weekly collection for food waste?

- Yes
- No
- unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

We agree that all households including those dwellings such as flats and houses in multiple occupation where citizens share a communal bin should have access to a food waste collection but that the minimum standard should be a fortnightly collection compatible with the comingled food and garden waste collection delivered to 'average' households by the Council.

We also recognise potential issues with communal bin use, including contamination and believe Council need to be able to retain the right to remove bins that become a regular/ongoing source of contamination.

4. Do you agree that councils should be required to implement a weekly food waste collection service from kerbside properties, keeping food and garden waste separate, by the points in time listed below?

Time Period	Yes	No	If you answered no, please provide the reason for your response with clear evidence such as collection contracts, treatment contracts, treatment infrastructure capacity (AD/IVC), cost burden, reprocessing, end markets.	Not sure
24 months from notification of a statutory requirement		X		
3 to 4 years from notification of a statutory requirement		X		
More than 4 years from notification of statutory requirement		X		
Never	X		Please see answer to Proposal 10 Q2 as these points are relevant to this question and should be considered as part of this response. No assessment on the requirement for weekly separate food waste collections should be made until such time as the impact of restricting residual waste collections can be measured in relation to moving food waste away from residual waste	

		bins into existing comingled food and garden waste bins. Council is not convinced of the need for weekly separate food waste collections with preference for greater diversion of food waste through restricting residual waste capacity at kerbside and robust communication methods making it clear that no household in Northern Ireland should dispose of any food waste via their residual waste collection service.	
Other – please detail		If DAERA insist on legislating for a more expensive kerbside collection service, such as the weekly collection of separately collected food waste, that inevitability increases cost via rates increases on L&CCC households revenue funding from central government would need to be available in perpetuity for the increased provision of the new model as a result of any such legislation.	

5. Do you agree that guidance should be provided on caddy liners, including on caddy liner material types?

- Yes
- No
- unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

Lisburn & Castlereagh City Council has provided compostable caddy liners for households since the merger of Councils under RPA in 2015. Councils are capable of sourcing and procuring suitable liners for use in the treatment processes they utilise without the need for government guidance.

These liners are specified based on information provided by the end processing composting company. If Central Government were to offer advice to other potential suppliers of compostable caddy liners such as supermarkets they would need to be sure that the specification was suitable for all technologies used to treat compostable food waste across Northern Ireland.

6. Do you agree that caddy liners should be provided free of charge to citizens that participate in food waste collection? (Please select only one option)

(1) Yes, via Council offices, libraries, leisure centres etc	
(2) Yes, as in (1) and via citizens adding their own note to their food waste containers to request new liners which crews deliver	

Yes, as in (1) and via a tag supplied in the roll of caddy liners that is attached to the food waste container by the citizen when their supply is low. Crews deliver new liners.	
Other method – please detail	X
No – citizens should purchase their own liners	
Not sure	

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

While Council agrees that caddy liners should be provided free of charge to citizens to facilitate diversion of food waste the method of this distribution should be down to each Council to determine. Council also however notes that provision of liners comes at a significant revenue cost and while the provision of foc liners is custom and practice revenue budgets are set and reviewed annually.

Councils are uniquely positioned to know what will work best for their local residents and do not feel it is the role of DAERA to dictate how services should be delivered. This is a decision that should be taken by local elected representatives on behalf of the constituents they represent.

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

- Do you agree that section 21 of the Waste and Contaminated Land (Northern Ireland) Order 1997, as amended, should be clarified to set out the circumstances in which Councils can enforce householders to place items of waste and recycling in certain receptacles and the levels of fixed penalty notice that could be levied where householders do not comply?
 - Yes
 - No
 - Unsure**

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

While clearer powers of enforcement to be applied uniformly by all Councils would be welcome it is important to note that there are difficulties associated with enforcement around waste and recycling collection services. In a separate section of this consultation DAERA has stipulated they do not consider people or historical preferences as being within scope of technical feasibility associated with how kerbside collections are delivered on the ground. Council disagree with this approach and feel failure to take people and historical preferences into consideration could lead to an unpopular kerbside collection service being forced on members of the public. A lack of ability to shape local services could be challenged as could any enforcement activities associated with a member of the public in effect opting out of using a system where no consultation or consideration was given as to public acceptability.

More clarity would also be required on who would be responsible for Regulation and Enforcement and what resources would be available to facilitate this. Council cannot be a fall-back position for enforcement of regulation or enforcement powers due to a lack of available resource within NIEA to conduct these regulatory duties. Council is under considerable financial pressures and do not have the resources necessary to conduct additional enforcement activities.

There have been well publicised difficulties with enforcement and FPN's associated with misuse of bins, and it is difficult to see how these can be overcome. Council as service providers to local ratepayers are also not often in the best position to undertake enforcement activities on services paid for by householders (through their domestic rates) they would be enforcing against.

The use of fines and increased enforcement activities on householders could have an adverse impact and lead to a negative public perception of kerbside recycling services and an associated reduction in participation and the quantity and or quality of material collected.

2. Do you agree that the following options should be adopted to help to improve the quality of recycling collected from households:

	Yes	No – if no, please state why	Unsure
Issuing standardised information in the form of leaflets to citizens at least annually		While Council can see the benefit of this proposal it comes at significant cost to design, print and deliver information of this nature. Given the continued pressures on Council budgets funding for financing of such communications	

		<p>would need to be guaranteed.</p> <p>The economic and environmental impact of this should be considered particularly the emissions impact from leaflet production and delivery, alternative low emission communication methods should be explored.</p> <p>Councils are best placed to decide the nature and frequency of communications regarding services with their residents.</p>	
Crew training on how to manage containers with the wrong items		Councils are best placed to decide what training requirements are necessary for staff who deliver front line services.	
Oversight of crew working practices		Councils are best placed to decide what supervision requirements are necessary for staff who deliver front line services.	
Better support to crews and recognition of their work		Councils are best placed to decide support and recognition is appropriate for staff who deliver front line services.	

Clear and updated visually appealing websites		Councils are best placed to decide the nature and frequency of communications regarding services with their residents	
Other - please detail	Funding to support implementation of integrated in cab and back office technology that allows real time capture of issues on the ground and appropriate correspondence with householders that also tracks 'repeat offenders' in relation to incorrectly presented containers/materials and delivering may of the points raised above.		

3. If a Fixed Penalty Notice system were to be levied where people continue to put the wrong items in their recycling containers, which of the values proposed for the Fixed Penalty Notice do you consider to be appropriate?

	About right	Too low	Too high	Unsure
£50				X
£75				X
£100 (existing value)				X
£150				X
£200				X
Other value you feel is appropriate – please detail	There have been well publicised difficulties within the UK with enforcement and FPN's associated with misuse of bins, and it is difficult to see how these can be overcome. Council as service providers to local ratepayers are also not often in the best position to undertake enforcement activities on services paid for by the householders they would be enforcing against (through their domestic rates).			

<p>Any other comments – please detail</p>	<p>There is a potential cost burden associated with administration of FPN’s and the resource necessary to pursue the non-payment of FPN’s through local courts, which often see similar types of environmental crime, such as littering, as trivial matters.</p> <p>There have been well publicised difficulties within the UK with enforcement and FPN’s associated with misuse of bins, and it is difficult to see how these can be overcome. Council as service providers to local ratepayers are also not often in the best position to undertake enforcement activities on services paid for by the householders they would be enforcing against (through their domestic rates).</p>
---	---

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

1. Do you agree that Non-Statutory Guidance would be useful as a framework on good practice collections from kerbside and communal dwellings, HWRCs and bring sites?

- Yes
- No
- Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

<p>Commonality in approach to the provision of services including assisted lifts, bulky waste collections and additional capacity for qualifying households would be useful however this should be in the form of guidance only. Councils would then have a ‘baseline’ against which they could consider such issues on a local level and if deemed appropriate amend policy based on individual Council circumstances.</p> <p>Council would not welcome guidance on pricing as this cannot be a one size fits all approach given each Council will have individual contracts, operational circumstances and service delivery environments that will all impact on reaching an appropriate price for the services they choose to charge for.</p> <p>Any such guidance should be developed in consultation with local government to ensure it is fit for purpose and reflective of how services are delivered on the ground.</p>

2. Do you agree that the following topics should be included in Non-Statutory Guidance to Councils on collections:

Topic	Yes	No – if no, please provide details on why you consider this topic not to be relevant	Unsure

Collection of hazardous waste from HWRCs		Councils should not be placed under any obligation to accept hazardous materials at HRCs, in fact site licences may restrict the nature and type of materials that can or cannot be accepted on site. Decisions on what materials are/are not accepted at HRC's need to remain under control of individual Councils.	
Collection of textiles, batteries, WEEE from the kerbside and communal properties		This is assuming Council are considering offering such a service. Council cannot offer bespoke services for problem waste streams ad infinitum.	
Collection of cooking and engine oil from the kerbside		This is assuming Council are considering offering such a service. Council cannot offer bespoke services for problem waste streams ad infinitum.	
Collection of AHPs (nappies, incontinence products) from the kerbside		Collected as residual waste with eligibility for additional capacity assessed in line with Council policy therefore additional guidance not required.	
Standardised arrangements for assisted collections from the kerbside	Commonality in approach to the provision of services including assisted lifts, bulky waste collections, and additional capacity for qualifying households would be useful however this should be in the form of guidance only. Councils would then have a 'baseline' against which they could consider such issues on a local level and if deemed		

	appropriate amend policy based on individual Council circumstances.		
Standardised price ranges and arrangements for bulky waste collections		Council would not welcome guidance on pricing as this cannot be a one size fits all approach given each Council will have individual contracts, operational circumstances and service delivery environments that will all impact on reaching an appropriate price for the services they choose to charge for.	
Standardised arrangements for replacement containers		This would assume all Councils will use the same types and sizes of containers	
Standardised arrangements for excess recycling		Council already supplements kerbside collections with a network of bring sites and Household Recycling Centres.	
Other – please detail	Any guidance should be compiled in consultation and with the agreement of Councils as this is where the relevant expertise lies to allow a fully informed consideration of these sorts of issues.		

PART 2: PROPOSALS TO IMPROVE CONSISTENCY IN RECYCLING FROM BUSINESSES AND THE WIDER NHM SECTOR

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

1. Do you agree with the list of **out-of-scope** waste producers, who will **not** be obligated to segregate a core set of dry recyclables from their residual waste?

- Yes
- No
- Unsure

If you disagree with this proposal, please provide the reason for your response below, with clear evidence.

While we agree that niche/special waste streams generated by the out-of-scope waste producers should be exempt e.g. sewage sludge, waste from any offices associated with the administration of such businesses should be included in any requirement to segregate dry recyclables from residual waste.

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

1. Do you agree with the contents of the list below, detailing the materials that should be included in the core set of recyclable streams collected separately from businesses and NHM producing premises by waste collectors, as a minimum?

	Agree. All items listed in the row should be included	Disagree. All items listed in the row should <u>not</u> be included for recycling. Please state which ones should be excluded and why.	Unsure
Paper and card, including newspaper, cardboard packaging, office, writing paper etc;			While we agree that businesses should be compelled to recycle a core set of dry recyclables we are not in favour of DAERA stipulating that this must be via 4 separate streams. Businesses & waste collection service providers should be free to design a service as

			long as dry recycling, food waste and residual waste are collected separately from one another.
Glass bottles and jars – including drinks bottles, condiment bottles, jars etc and their metal lids			While we agree that businesses should be compelled to recycle a core set of dry recyclables we are not in favour of DAERA stipulating that this must be via 4 separate streams. Businesses & waste collection service providers should be free to design a service as long as dry recycling, food waste and residual waste are collected separately from one another.
Metals: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes			While we agree that businesses should be compelled to recycle a core set of dry recyclables we are not in favour of DAERA stipulating that this must be via 4 separate streams. Businesses & waste collection service providers should be free to design a service as long as dry recycling, food waste and residual waste are collected separately from one another.
Plastic bottles – including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays plus cartons (such as Tetrapak)			While we agree that businesses should be compelled to recycle a core set of dry recyclables we are not in favour of DAERA stipulating that this must be via 4 separate streams. Businesses & waste collection service providers should be free to design a service as long as dry recycling, food waste and residual waste are collected separately from one another.

2. Do you agree with the contents of the list below, detailing those materials that should be excluded currently from the core set of dry recyclables and therefore not collected by waste collectors from obligated businesses, public bodies, and other organisations, as a minimum?

Material	Items proposed to be excluded	Agree. All items listed in the row should be excluded from recycling	Disagree. Items listed in the row should be <u>included</u> for recycling. Please state which items should be included and why.	Unsure
Glass	Ceramics, e.g., Crockery or earthenware Drinking glasses Flat glass Glass cookware including Pyrex Light bulbs and tubes Microwave plates Mirrors Vases Window glass	x		
Metal	Laminated foil i.e., pet food pouches, coffee pouches General kitchenware i.e., cutlery, pots, and pans Any other metal items, i.e., kettles, irons, pipes, white goods	x		
Plastic	Any plastic packaging or non-packaging items labelled as "compostable" or "biodegradable" (including but not limited to coffee pods and cutlery) with the exception of food waste caddy liners in food waste recycling collections	x		

	Plastic pouches with laminated foil layer i.e., pet food pouches, coffee pouches Plastic bottles containing white spirits, paints, engine oils and antifreeze Bulky rigid plastics such as garden furniture, bins, and plastic toys Polystyrene (expanded and high impact) Polyvinyl chloride (PVC) packaging			
Paper and card	Absorbent hygiene products (AHPs) including nappies, period products and incontinence items Cotton wool, make up pads Tissue/toilet paper Wet wipes for example for nappy changing times, kitchen/ bathroom cleaning	x		

3. Do you agree that the list of materials to be collected as a minimum should be regularly reviewed, and providing certain conditions met, expanded?

- Yes
- No
- Unsure

If you disagree with this proposal, then please provide your reason with supporting evidence in the box below.

Implementation of any changes to the core set of materials following a review period would need to take into account operational and contractual constraints.

The stated aim of introducing a core set of recyclables for dry recycling from businesses and the NHM Sector is to provide uniform collections from homes, businesses, schools etc. It is not however clear how this would be achieved following introduction of an initial set of core materials as while Councils are solely responsible for Household Collections in NI the 'commercial' sector is predominately serviced by private sector waste management companies with Councils providing a service to a relatively small number of businesses.

Enforced introduction of additional core materials could result in additional costs for collection and treatment of these materials which may have an impact on business models or indeed some contractors ability to continue to offer a service, it may also have contractual issues with customers, all of which needs to be further thought through.

4. If the proposal for a minimum list of dry recyclable materials to be collected for recycling were to be adopted and regularly reviewed, do you agree that the frequency of review should be every two years.

- Yes
 No
 Unsure

If you answered "No" please provide the reason for your response. Your response should include clear evidence as to what frequency of review would be more appropriate.

Implementation of any changes to the core set of materials following a review period would need to align with contractual arrangements therefore while an arbitrary review period could be agreed there would need to be flexibility for implementation of changes following review to take into account operational and contractual constraints.

5. What, if any, other products or materials do you consider should be also included in the minimum list of materials to be collected by waste collectors from obligated businesses, public bodies, and other organisations? Please provide your response in the box below and clear evidence as to why the list should include the material(s).

Councils cannot be expected to facilitate collection of ever-increasing types of waste for recycling without consideration being given as to how covering the additional costs of collection and processing is to be facilitated.

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

1. Do you have any views on how plastic film should be collected from obligated businesses, public bodies, and other organisations?
 - Collected as a separate stream from all other recyclables, and from residual waste i.e., in a dedicated bag or container,
 - Collected in a container alongside other plastics – bottles, pot, tubs, and trays,
 - Collected mixed with other dry recyclables in the same container,
 - Other (please detail and explain your reasoning for this proposal with supporting evidence)
 - Unsure

Given that pEPR is currently delayed for households and business packaging has been considered out of scope until the scheme is reviewed in 2026/27 at the earliest it is unclear how sufficient planning can be made to include these materials no later than 31/3/27.

2. Collecting plastic films from all obligated businesses, public bodies and other organisations by the 31st March 2027 may be challenging. using the list below please select those reasons which you believe will affect the ability to collect plastic film by this timeframe from businesses and NHM producing premises.

Please provide evidence with justification, as appropriate. Not all rows need to be completed. Please use N/A where not applicable.	
Collection and treatment contract limitations	x
MRF infrastructure and/or capacity	x
Inability to resource and mobilise within the timeframe	x
Cost Burden to obligated businesses, and NHM producing premises	x
Reprocessing availability	x
End Market volatility/lack of end markets	x
Other – please describe	Given that pEPR is currently delayed for households and business packaging has been considered out of scope until the scheme is reviewed in 2026/27 at the earliest it is unclear how sufficient planning can be made to include these materials no later than 31/3/27.

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

1. Do you agree with our proposal that will require the separate collection of food waste from all businesses and the wider NHM sector within 24 months of notification of a statutory requirement?

- Yes
- No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.
- Unsure

As Councils currently provide a comingled food & garden waste collection service to Households any collection of food waste from businesses would be delivered alongside this.

While Council agrees, in principle that businesses generating enough food waste should be required to separate this from residual waste and dry recyclables, in order for collection by Council to be feasible it should be permitted within a comingled organics collection. This would result in food waste still being diverted from landfill but without the need for stand alone food waste collections that are not compatible with current operational models.

Also Council has a long term treatment contract until November 2029 that utilises in-vessel composting therefore any food waste, were it to be collected separately, would ultimately be mixed with garden waste to facilitate the composting process.

2. Do you agree that the Food Waste Regulations (Northern Ireland) 2015 should be extended to require all obligated businesses, public bodies, and other organisations to segregate food waste for separate collection?

- Yes, I agree - the Regulations should be extended to cover all obligated businesses, public bodies and other organisations, no matter of their size or nature. (If yes, go to Q7)
- No, I disagree – the Regulations should not be extended to cover all obligated businesses, public bodies or other organisations, no matter of their size or nature, some exemptions or phasing should apply.
- Unsure

3. If you disagreed, do you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations?

- Yes
- No (If no, go to Q5)
- Unsure

If you have answered no, please explain why you have this view, supplying evidence to justify your opinion.

4. If you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations, what parameter should be used to determine the de minimis amount? Please select from the list provided.

- 0-5kg of food waste per week
- 5kg+ food waste per week
- Other (please specify and provide evidence to support your proposal)

5. If you disagreed, do you believe that exemptions or phasing should be applied to the amended Food Waste Regulations (Northern Ireland) 2015 for some obligated businesses, public bodies, and other organisations? Please select the option that most closely represents your view and provide evidence to support your comments.

- **Option 1** - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be exempt from any requirement to segregate food waste from other waste streams.
- **Option 2** - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be given two additional years to comply with the new requirements (i.e., compliant 4 years post the legislative enactment)

If neither of the above options represents your view, please detail your view providing the reason for your response, and indicate if appropriate how long obligated businesses, public bodies, and other organisations, would require before they can segregate a core set of recyclables for recycling.

6. If you disagreed, do you believe that some obligated businesses, public bodies, or other organisations should not be required to segregate food waste for collection due to their nature, please detail the reason for this view, supplying evidence to justify your opinion.

7. To what extent do you agree that the measures we have proposed will increase the recycling of food waste from obligated businesses, public bodies, and other organisations? Please provide evidence to support your answer if possible.

- Strongly agree
 Agree
 Neither agree nor disagree
 Disagree
 Strongly disagree
 No opinion

Existing Food Waste Regulations already require all businesses that generate more than 5kg of food waste to have a food waste collection. It is however unclear how much of an impact these regulations have had for two main reasons:

- Lack of robust data reporting requirements for businesses meaning no baseline or year on year progress can be monitored.
- Lack of any meaningful enforcement of the Regulations.

DAERA need to properly resource communication and enforcement within the business sector as well as implementing proper waste data reporting mechanisms to measure and monitor compliance. This needs to be resourced and implemented by central government. Councils cannot be expected to take on additional regulatory responsibility with no resources available to deliver this and cannot be expected to make up for the lack of regulation or enforcement to date.

8. Are there any further measures that you would like to see included over and above our proposals that would improve the recycling of food waste by obligated businesses, public bodies, and other organisations? Please provide supporting evidence for any proposed measures.

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

1. We propose that anaerobic digestion is the preferred method for treating separately collected food waste, where suitable, but composting is also permitted. Do you agree with this view?

- Yes
 No
 Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

Council is in a long-term contract for the in-vessel composting of comingled food & garden waste and is not convinced that AD infrastructure within Northern Ireland is suitably developed and capable of treating all household and NHM sector food waste were it to be collected separately.

While not experts in AD technology Council is aware of environmental concerns around the nutrient values of by products from the AD process and ask if this has been taken into consideration when proposing AD as the preferred treatment method for food waste.

DAERA also need to consider if stipulation of AD as a treatment technology is unfairly distorting the free market for service providers to come up with suitable treatment solutions for compostable materials and as such could be subject to legal challenge e.g. from in-vessel composting businesses. Stipulating AD as a treatment preference could also perversely negatively impact on potential innovation and development of alternative treatment technologies over time.

Combustion of bio-methane, created through AD, as a heat source produces GHG emissions. A demand for biomethane could create a market for unsustainable practices and drive a demand for food waste as a fuel source slowing the transition to 'clean' and zero carbon renewable heat technologies. Renewable heat sources should be prioritised over biomethane.

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

1. Do you agree that obligated businesses, public bodies, and other organisations should be required to segregate each of the following dry recyclables for collection and recycling?

Core dry recyclable	Example	Yes, agree	No, disagree	Unsure/ no opinion
Separate glass bottles and containers	Including drinks bottles, condiment bottles, jars, etc.		While we agree that businesses should be compelled to recycle a core set of recyclables we are not in favour of DAERA stipulating that this must be via 4 separate streams.	

			Businesses & waste collection service providers should be free to design a service as long as dry recycling, food waste and residual waste are collected separately from one another.	
Separate Paper and card	Including newspaper, cardboard packaging, writing paper, etc.		While we agree that businesses should be compelled to recycle a core set of recyclables we are not in favour of DAERA stipulating that this must be via 4 separate streams. Businesses & waste collection service providers should be free to design a service as long as dry recycling, food waste and residual waste are collected separately from one another.	
Separate Plastics and metals	Including drinks containers, detergent, shampoo and cleaning products, pots, tubs & trays, etc.		While we agree that businesses should be compelled to recycle a core set of recyclables we are not in favour of	

	<p>Steel and aluminium tins and cans, including aerosols Drinks cartons (i.e., Tetrapak)</p>		<p>DAERA stipulating that this must be via 4 separate streams. Businesses & waste collection service providers should be free to design a service as long as dry recycling, food waste and residual waste are collected separately from one another.</p>
--	--	--	--

2. Do you have any other comments to make on the separate collection of dry recycling from businesses and the NHM sector?

Small businesses do not have the capacity to house multiple containers making a multi stream collection totally unviable.

The proposed introduction of QualiTEE in Northern Ireland would impact on multi national companies sourcing contracts across various regional jurisdictions potentially complicating recycling further rather than making it a more attractive proposal.

Simpler recycling proposals in England will see new exemptions to make sure that waste collectors will be able to collect dry recyclables together in the same container, introducing a more convenient and practical system which prevents councils and businesses from being hit with more complex collection systems, while making sure all local authorities collect the required recyclable waste streams: glass; metal; plastic; paper and card; food waste; and garden waste.

In the Government response to the 'Consistency in household and business recycling in England' Consultation it is stated "we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials." Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards requiring implementation of a minimum three stream collection with respondents being asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.

The updated Government response to the outcome of the DEFRA Consultation on Consistency Recycling in England confirms "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We believe that similar exemptions should be introduced in Northern Ireland rather than the imposition of the proposed QualiTEE assessment. It seems irrational that one collection method is deemed acceptable in a region of the UK with Government in N.Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers to deliver acceptable quality dry recyclables for end markets.

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

1. Please detail examples of technical challenges, with any supporting evidence, which you believe demonstrate that a separate collection of dry recyclables will not be feasible in circumstances for some or all NHM sector premises.

Council does not agree with a default position that businesses should be required to separate dry recyclables in a “multi-stream,” with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.

In the case of businesses requesting a service from Council this service would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capacity to house multiple containers making a multi stream collection totally unviable. If consistency is to be delivered across households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.

Simpler recycling proposals in England will see new exemptions to make sure that waste collectors will be able to collect dry recyclables together in the same container, introducing a more convenient and practical system which prevents councils and businesses from being hit with more complex collection systems, while making sure all local authorities collect the required recyclable waste streams: glass; metal; plastic; paper and card; food waste; and garden waste.

In the Government response to the ‘Consistency in household and business recycling in England’ Consultation it is stated “we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of ‘household waste’ recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials.” Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards requiring implementation of a minimum three stream collection with respondents being asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.

The updated Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England confirms “The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect”. We believe that similar exemptions should be introduced in Northern Ireland rather than the imposition of the proposed QualiTEE assessment. It seems irrational that one collection method is deemed acceptable in a region of the UK with Government in N.Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers to deliver acceptable quality dry recyclables for end markets.

2. To make the case that separate collection does not deliver the best Environmental Outcome compared to the collection of recyclable waste streams together, do you agree that evidence on the overall impact of the management of the NHM sector waste stream should be provided on the measures listed but not limited to the following:

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
Quantities of materials collected;		<p>Council does not agree with a default position that businesses should be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p> <p>Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.</p> <p>In the case of businesses requesting a service from Council this service would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capability to house multiple containers making a multi stream collection totally unviable.</p>	

		<p>Even if such a system was technically viable it is likely it would introduce significant cost to SME's in relation to their waste management. This is unacceptable especially given Councils role in promoting local economic development and given the well publicised economic pressures already experienced by these SME's.</p> <p>If consistency is to be delivered across households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.</p>	
<p>Quantities of materials classed as contamination and not recycled;</p>		<p>Council does not agree with a default position that businesses should be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p> <p>Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.</p> <p>In the case of businesses requesting a service from Council this service</p>	

		<p>would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capability to house multiple containers making a multi stream collection totally unviable. Even if such a system was technically viable it is likely it would introduce significant cost to SME's in relation to their waste management. This is unacceptable especially given Councils role in promoting local economic development and given the ell publicised economic pressures already experienced by these SME's.</p> <p>If consistency is to be delivered across households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.</p>	
<p>Quantities of materials lost from sorting processes at a MRF;</p>		<p>Council does not agree with a default position that businesses should be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p> <p>Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and</p>	

		<p>commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.</p> <p>In the case of businesses requesting a service from Council this service would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capability to house multiple containers making a multi stream collection totally unviable. Even if such a system was technically viable it is likely it would introduce significant cost to SME's in relation to their waste management. This is unacceptable especially given Councils role in promoting local economic development and given the ell publicised economic pressures already experienced by these SME's.</p> <p>If consistency is to be delivered across households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.</p>	
<p>Vehicle emissions from collection rounds;</p>		<p>Council does not agree with a default position that businesses should be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p>	

		<p>Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.</p> <p>In the case of businesses requesting a service from Council this service would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capability to house multiple containers making a multi stream collection totally unviable. Even if such a system was technically viable it is likely it would introduce significant cost to SME's in relation to their waste management. This is unacceptable especially given Councils role in promoting local economic development and given the ell publicised economic pressures already experienced by these SME's.</p> <p>If consistency is to be delivered across households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.</p>	
<p>Vehicle emissions from bulk transportation to sorting and</p>		<p>Council does not agree with a default position that businesses should</p>	

<p>reprocessing both in NI and overseas;</p>		<p>be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p> <p>Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.</p> <p>In the case of businesses requesting a service from Council this service would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capability to house multiple containers making a multi stream collection totally unviable. Even if such a system was technically viable it is likely it would introduce significant cost to SME's in relation to their waste management. This is unacceptable especially given Councils role in promoting local economic development and given the ell publicised economic pressures already experienced by these SME's.</p> <p>If consistency is to be delivered across</p>	
--	--	--	--

		<p>households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.</p>	
<p>Emissions from disposal/ treatment including savings arising from landfill diversion; and</p>		<p>Council does not agree with a default position that businesses should be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p> <p>Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.</p> <p>In the case of businesses requesting a service from Council this service would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capability to house multiple containers making a multi stream collection totally unviable. Even if such a system was technically viable it is likely it would introduce significant cost to SME's in relation to their waste management. This is unacceptable especially</p>	

		<p>given Councils role in promoting local economic development and given the well publicised economic pressures already experienced by these SME's.</p> <p>If consistency is to be delivered across households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.</p>	
<p>Carbon savings from using recycled materials rather than virgin materials</p>		<p>Council does not agree with a default position that businesses should be required to separate dry recyclables in a "multi-stream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in their dry recycling collection.</p> <p>Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be separated from residual waste for dry recycling but leave it up to businesses and commercial waste collection operators as to the collection system to be adopted for best delivery in each individual circumstance.</p> <p>In the case of businesses requesting a service from Council this service would need to mirror household collections as these form the majority of collection operations for the Council. It is unlikely that small businesses will have the capability to</p>	

		<p>house multiple containers making a multi stream collection totally unviable. Even if such a system was technically viable it is likely it would introduce significant cost to SME's in relation to their waste management. This is unacceptable especially given Councils role in promoting local economic development and given the well publicised economic pressures already experienced by these SME's.</p> <p>If consistency is to be delivered across households and businesses a dry recycling collection system that is practical for both households and the NHM sector would be key.</p>	
<p>Other factors to be added – please describe</p>	<p>Simpler recycling proposals in England will see new exemptions to make sure that waste collectors will be able to collect dry recyclables together in the same container, bring in a more convenient and practical system which prevents councils and businesses from being hit with more complex collection systems, while making sure all local authorities collect the required recyclable waste streams: glass; metal; plastic; paper and card; food waste; and garden waste.</p> <p>In the Government response to the 'Consistency in household and business recycling in England' Consultation it is stated "we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials." Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards requiring implementation of a minimum three stream collection with respondents being</p>		

	<p>asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.</p> <p>The updated Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England confirms "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We believe that similar exemptions should be introduced in Northern Ireland rather than the imposition of the proposed QualiTEE assessment. It seems irrational that one collection method is deemed acceptable in a region of the UK with Government in N.Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers to deliver acceptable quality dry recyclables for end markets.</p> <p>Emissions from required replacement of waste receptacles for both production of new containers and disposal of old containers (prior to their normal expected lifespan) to facilitate a separate collection compared to a collection of recyclable waste streams together should be measured.</p> <p>Emissions from required replacement of recycling collection vehicles for both the production of new vehicles and the disposal of redundant vehicles (prior to their normal expected lifespan) to facilitate a separate collection compared to a collection of recyclable waste streams together should be measured. Consideration should be given to alternative low emissions fleet models moving forward.</p>
--	--

3. Do you agree that the following evidence factors should be provided by a waste carrier to demonstrate that NHM sector recyclable materials are of comparable quality?

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence	Unsure
<p>Comparable quantities (+/-2%) of each material stream sent for closed loop recycling</p>		<p>There is a lack of an agreed definition on what is meant by quality. While DAERA seem to have come to a position, that only those materials collected through 'kerbside sort' type collection systems deliver quality there is another school of thought in this regard. Investment in developing MRF infrastructure and technology to service a commingled collection can achieve separation of dry recyclables that result in material of a suitable quality to be recycled therefore delivering the desired recycling outcome utilising a collection methodology that is well established across Northern Ireland. This will reduce the need for capital investment in new vehicles and containers.</p> <p>This proposal also seems to infer that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. No evidence has been provided that if all Councils were to move to such a collection methodology then the end destinations utilised would deliver more closed loop recycling. In fact, it could lead to saturation of existing markets.</p> <p>Councils ultimately provide collection services with materials delivered to MRFs from which they are sorted and marketed to end destinations for reprocessing. Council maintains this is an issue for MRF operators to offer solutions in order to deliver quality recycling to either Open or Closed loop destinations based on market conditions.</p> <p>A memo produced by Re-Gen a commercial operator of a dry recycling MRF in Northern Ireland, in response to a presentation made to the APG Climate Action Group Meeting on 3 May</p>	

		<p>2024 by Keep Recycling Local maintains their process has comparable and better-quality output material for paper, plastic and other materials and they also sell glass to both the UK and Belgium where it is reprocessed back to bottle at a rate of 85%. Regen also ascertains that a £30 million spend on glass plant in Northern Ireland could achieve better recycling locally as an alternative option to the costly introduction of kerbside sort collections. There is a question as to why these types of proposals have not been considered by DAERA and presented as alternatives within the consultation document.</p> <p>In addition, where a MRF facility is shared by a number of Councils the proportion of materials that go to an open or closed loop end destination are facility averages and therefore not representative of the actual quantity/quality of material collected by individual Councils.</p>	
<p>Comparable quantities (+/- 5%) of each material stream sent for open loop recycling</p>		<p>There is a lack of an agreed definition on what is meant by quality. While DAERA seem to have come to a position, that only those materials collected through 'kerbside sort' type collection systems deliver quality there is another school of thought in this regard. Investment in developing MRF infrastructure and technology to service a commingled collection can achieve separation of dry recyclables that result in material of a suitable quality to be recycled therefore delivering the desired recycling outcome utilising a collection methodology that is well established across Northern Ireland. This will reduce the need for capital investment in new vehicles and containers.</p> <p>This proposal also seems to infer that only materials from collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. No evidence has been provided that if all Councils were to move to such a collection methodology then the end destinations utilised would deliver more closed loop recycling. In fact, it could lead to saturation of existing markets.</p>	

		<p>Councils ultimately provide collection services with materials delivered to MRFs from which they are sorted and marketed to end destinations for reprocessing. Council maintains this is an issue for MRF operators to offer solutions in order to deliver quality recycling to either Open or Closed loop destinations based on market conditions.</p> <p>A memo produced by Re-Gen a commercial operator of a dry recycling MRF in Northern Ireland, in response to a presentation made to the APG Climate Action Group Meeting on 3 May 2024 by Keep Recycling Local maintains their process has comparable and better-quality output material for paper, plastic and other materials and they also sell glass to both the UK and Belgium where it is reprocessed back to bottle at a rate of 85%. Regen also ascertains that a £30 million spend on glass plant in Northern Ireland could achieve better recycling locally as an alternative option to the costly introduction of kerbside sort collections. There is a question as to why these types of proposals have not been considered by DAERA and presented as alternatives within the consultation document.</p> <p>In addition, where a MRF facility is shared by a number of Councils the proportion of materials that go to an open or closed loop end destination are facility averages and therefore not representative of the actual quantity/quality of material collected by individual Councils.</p>	
<p>Other factors to be added – please describe</p>			

4. Do you agree with the distance factor of more than 3 miles from another obligated NHM organisation, whereby collectors should not be required to collect recycling separately?
- Yes
 - No
 - Unsure

If no, your response should include evidence as to why the distance factor is not appropriate and if relevant, supply information on an alternative distance.

If Council are to deliver recycling collections to NHM organisations these will need to mirror the offering provided to households. There is therefore no reason why distance would be a restricting factor as long as NHM collections could be delivered alongside household collections.

5. Do you agree that if the quantity of all core materials for collection is less than 3kg per week from one NHM organisation, then collectors should not be required to collect recycling separately?

Yes

No

Unsure

If no, your response should include evidence as to why the quantity is not appropriate and if relevant, supply information on an alternative amount.

6. Which is your preferred option for collectors when requested to collect recycling where the distance to an obligated NHM organisation is above 3 miles or where the quantity of all core materials is less than 3kg per week? Please rank your preference where 1 is most preferred:

Preferred Option	Select Ranking (1-4, where 1 is most preferred)
Mixed recycling collections	
Separate recycling collections using different coloured "survival sacks" which are collected in the same vehicle as residual waste, then managed apart from the residual waste after the vehicle tips off.	
No recycling collections required, and a collector could direct organisations to alternative facilities.	
Something else - please detail. We are unclear what is meant by mixed recycling collections. If it means mixed domestic and NHM collections, while not against this in principle there could be issues with implementation of digital waste tracking and allocation of mixed loads to either a domestic or non-domestic setting. This proposal needs more consideration especially with respect to the potential financial, operational and resources impacts on Councils.	

Private sector waste operators can make a commercial decision to not offer a service to businesses leaving the potential for harder to reach, less lucrative NHM premises falling back to Council as a default service provider.

7. Do you agree standard default values and data that have clearly referenced sources (that cover comparable Quality of materials, Environmental outcomes and Technical feasibility) which could be used to support a written assessment, would be useful?

- Yes
 No
 Unsure

If you disagree, please provide the reason for your response.

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Standard default values in relation to environmental outcomes (specifically carbon) will be based on averages that may not provide an accurate representation of the carbon impact of the plants that local authorities are sending their waste to.

Carbon WARM states 'While the factors contained herein represent the best available information on greenhouse gas emissions for waste management options in the UK, the data are subject to uncertainty and are based on averages. They may not reflect specific facilities or other activities (e.g. a process powered solely by renewable energy). The results should be regarded as indicative of the relative impacts of waste treatment options, rather than as a precise carbon footprint. Care should be taken not to model scenarios that produce a spurious conclusion. For example, when modelling energy from waste, account should be taken of the required fuel mix for an EFW facility, as opposed to picking materials based purely on relative emissions'.

Standard default values would be useful if they are specific to Northern Ireland and represent the collections rounds and technologies available here, rather than being based on averages from England or elsewhere.

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

1. Where waste collectors do not collect dry recyclable waste in the permitted three segregated streams, do you agree that the collector should produce a written assessment based on the template shown in Appendix 3 to outline the exception (s) to the requirement?

- Yes
- No – further content should be added to the template.
- No – content should be removed from the template.
- Unsure

If you responded No, please provide the reason for your response below, including your suggested amendments to the template.

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council also feels there is a risk to the introduction of an additional administrative burden in the form of such a written assessment. Private sector waste companies may deem this an additional cost and not worth the effort for smaller, less profitable contracts and therefore cease to service the same. By default, customers may then revert to a Council service adding work and a requirement for additional resource within Councils.

There is a lack of an agreed definition on what is meant by quality. While DAERA seem to have come to a position, that only those materials collected through 'kerbside sort' type collection systems deliver quality there is another school of thought in this regard. Investment in developing MRF infrastructure and technology to service a commingled collection can achieve separation of dry recyclables that result in material of a suitable quality to be recycled therefore delivering the desired recycling outcome utilising a collection methodology that is well established across Northern Ireland. This will reduce the need for capital investment in new vehicles and containers.

Only collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. Simpler recycling proposals in England will see new exemptions to make sure that waste collectors will be able to collect dry recyclables together in the same container, bring in a more convenient and practical system which prevents councils and residents from being hit with more complex collection systems, while making sure all local authorities collect the required recyclable waste streams: glass; metal; plastic; paper and card; food waste; and garden waste.

In the Government response to the 'Consistency in household and business recycling in England' Consultation it is stated "we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in

2021 to 2022 provided a co-mingled service for dry materials.” Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards requiring implementation of a minimum three stream collection with respondents being asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.

The updated Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England confirms “The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect”. We believe that similar exemptions should be introduced in Northern Ireland rather than the imposition of the proposed QualiTEE assessment. It seems irrational that one collection method is deemed acceptable in a region of the UK with Government in N.Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers to deliver acceptable quality dry recyclables for end markets.

2. Do you agree that reference to standard default values and data that have clearly referenced sources, which could be used to support a written assessment, would be useful?

- Yes
- No
- Unsure

If you disagree, please provide the reason for your response with supporting evidence in the box below.

Council is not supportive of any requirement to collect recyclable waste streams separately from each other or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Standard default values in relation to environmental outcomes (specifically carbon) will be based on averages that may not provide an accurate representation of the carbon impact of the plants that local authorities are sending their waste to.

Carbon WARM states 'While the factors contained herein represent the best available information on greenhouse gas emissions for waste management options in the UK, the data are subject to uncertainty and are based on averages. They may not reflect specific facilities or other activities (e.g. a process powered solely by renewable energy). The results should be regarded as indicative of the relative impacts of waste treatment options, rather than as a precise carbon footprint. Care should be taken not to model scenarios that produce a spurious conclusion. For example, when modelling energy from waste, account should be taken of the required fuel mix for an EfW facility, as opposed to picking materials based purely on relative emissions'.

Standard default values would be useful if they are specific to Northern Ireland and represent the collections rounds and technologies available here, rather than being based on averages from England or elsewhere.

3. Do you agree that waste carriers for NHM recycling should be encouraged to have regard to the principle of QualiTEE (and not required to conduct a written assessment) during the first two years following the introduction of legislation requiring separate NHM recycling collections?
- Yes
 - No
 - Unsure
 - If no, please provide information as to why you disagree.

Council is not supportive of a requirement to collect recyclable waste streams separately or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council also feels there is a risk to the introduction of an additional administrative burden in the form of such a written assessment. Private sector waste companies may deem this an additional cost and not worth the effort for smaller, less profitable contracts and therefore cease to service the same. By default, customers may then revert to a Council service adding work and a requirement for additional resource within Councils.

There is a lack of an agreed definition on what is meant by quality. While DAERA seem to have come to a position, that only those materials collected through 'kerbside sort' type collection systems deliver quality there is another school of thought in this regard. Investment in developing MRF infrastructure and technology to service a commingled collection can achieve separation of dry recyclables that result in material of a suitable quality to be recycled therefore delivering the desired recycling outcome utilising a collection methodology that is well established across Northern Ireland. This will reduce the need for capital investment in new vehicles and containers.

Only collections that deviate from the 'preferred' separate collection method would be subject to such evaluation. Simpler recycling proposals in England will see new exemptions to make sure that waste collectors will be able to collect dry recyclables together in the same container, bring in a more convenient and practical system which prevents councils and residents from being hit with more complex collection systems, while making sure all local authorities collect the required recyclable waste streams: glass; metal; plastic; paper and card; food waste; and garden waste.

In the Government response to the 'Consistency in household and business recycling in England' Consultation it is stated "we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials." Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards requiring implementation of a minimum three stream collection with respondents being asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.

The updated Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England confirms "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one

recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We believe that that similar exemptions should be introduced in Northern Ireland rather than the imposition of the proposed QualiTEE assessment. It seems irrational that one collection method is deemed acceptable in a region of the UK with Government in N.Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers to deliver acceptable quality dry recyclables for end markets.

4. Do you agree with the recommendation that waste collectors should review and re-submit written assessments at least every 2 years?

- Yes
 No
 Unsure

If you disagree, please select one of the following statements that best describes why:

- Revising written assessments every 2 years is too frequent (please state how frequently you think they should be revised and evidence why)
 Revising written assessments at least every 2 years is too infrequent (please state how frequently you think they should be revised and evidence why)
 Written assessments should be revised every time changes are made to the collection services delivered by the waste collector or the treatment facility, they use i.e., collection methodology utilised, access to a new recycling facility.
 Other (please detail providing evidence to support your opinion).

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council references in its entirety our response to Proposal 20 Question 1 as being applicable in response to this question and submit this in response to this question also.

5. Using a template to produce a written assessment and using standardised data should reduce the burden on waste collectors. What other ways to reduce the burden on waste collectors should we consider for the written QualiTEE assessment?

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council references in its entirety our response to Proposal 20 Question 1 as being applicable in response to this question and submit this in response to this question also.

6. Do you agree with the content of the written assessment template for collection of waste from obligated businesses, public bodies or other organisations as provided at Appendix 3?

- Yes
- No
- Unsure

If you disagree, please select any of the following that best describe why:

- Further content should be added (please comment)
- Content should be removed (please comment)
- Other (please comment)

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council references in its entirety our response to Proposal 20 Question 1 as being applicable in response to this question and submit this in response to this question also.

7. Do you have any other comments on the content for the written assessment template for non-household municipal collections?

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council references in its entirety our response to Proposal 20 Question 1 as being applicable in response to this question and submit this in response to this question also.

8. We are proposing that a waste collector should only need to produce one written assessment for each set of premises or rurality that they intend to employ an exception for. For 'set of premises', we have suggested that this would include at a national level, groups of premises on a collection route or type of premises, for example hospitality premises. Do you agree with the examples listed for 'set of premises'?

- Yes
 No
 Unsure (please comment)

If you disagree, please select one of the following statements that best describes why:

- Other examples should be added to the list (please comment)
 Examples should be removed from the list (please comment)
 Other (please comment)

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council references in its entirety our response to Proposal 20 Question 1 as being applicable in response to this question and submit this in response to this question also.

9. What other factors, if any, should be taken into consideration and included in the written assessment? For example, different premise type in a service/geographical area, costs of breaking existing contractual arrangements and/or access to treatment facilities.

Council is not supportive of a requirement to collect recyclable waste streams separately from one another or to provide any form of written assessment in relation to not collecting dry recyclable streams separately.

Council maintains that DAERA should establish a set of criteria for businesses to meet e.g. stipulating a core set of materials that must be collected at kerbside for dry recycling but leave it up to Councils and private sector waste management companies offering NHM collection to determine how this can be best delivered in their area.

Council references in its entirety our response to Proposal 20 Question 1 as being applicable in response to this question and submit this in response to this question also.

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

1. Do you agree that the range of proposals set out by DAERA in this consultation once implemented, will sufficiently ensure that NHM recycling collections focus on segregating recyclable waste from residual waste alongside improving the quality and quantity of recycling?
 - Yes
 - No - If no, your response should include clear evidence as to why you have this.
 - Unsure

If Council are to deliver recycling collections to NHM organisations these will need to mirror the offering provided to households.

In the Government response to the 'Consistency in household and business recycling in England' Consultation it is stated "we consider that there is sufficient evidence that the co-collection of dry recyclable materials will not significantly reduce their potential to be recycled, so long as dry recycling is collected separately from residual and organic waste. Based on available data, co-collection does not have a significant impact on recycling rates. Six of the top 10 local authorities in terms of 'household waste' recycling rate in England in 2021 to 2022 provided a co-mingled service for dry materials." Is this evidence available to DAERA and if so, why has it not been presented as an alternative proposal within the consultation document? All evidence presented in the consultation document leans towards requiring implementation of a minimum three stream collection with respondents being asked to present alternative evidence if they are not in agreement with this proposal. If such evidence already exists and has been used in England to come to the conclusion above surely it should have been made available so as to better inform this consultation and provide serious alternative options for consideration.

The updated Government response to the outcome of the DEFRA Consultation on Consistency in Household Recycling in England confirms "The Secretary of State has the power to set an exemption from the requirement to separately collect in relation to 2 or more recyclable waste streams, if satisfied that doing so does not significantly reduce the potential for the waste streams to be recycled or composted. We propose to provide a further exemption to allow all dry recyclables (paper and card, plastic, glass and metal) to be collected together in one recycling bin. If using an exemption, waste collectors would not be required to produce a written assessment to co-collect". We believe that that similar exemptions should be introduced in Northern Ireland rather than the imposition of the proposed QualiTEE assessment. It seems irrational that one collection method is deemed acceptable in a region of the UK with Government in N.Ireland attempting to require local Councils here to undertake an unnecessarily burdensome QualiTEE assessment in order to implement a collection system that the English Government considers to deliver acceptable quality dry recyclables for end markets.

More clarity would also be required on who would be responsible for Regulation and Enforcement and what resources would be available to facilitate this. Council cannot be a fall-back position for enforcement of new legislation or passed enforcement powers due to a lack of available resource within NIEA to conduct these regulatory duties. Council is under considerable financial pressures and does not have the resource necessary to conduct additional enforcement activities.

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

1. What are the main barriers that obligated businesses (small and micro-firms in particular), public bodies and other organisations face when trying to recycle? Please select one option for each barrier listed.

	Major Barrier	Some Barrier	Little/No Barrier	No opinion

Financial	x			
Contractual		x		
Space	x			
Engagement				Unclear what exactly is meant by this
Location		x		
Time and expense of staff training	x			
Enforcement				Unclear what exactly is meant by this
Lack of awareness or understanding of how to recycle more waste		x		
Other				

Please provide further detail of these barriers and how you believe they can be overcome alongside any supporting evidence.

More important to consider feedback from this sector as a Council we have offered an opinion but the business sector is better placed to articulate their actual barriers which may in fact vary from business to business.

2. Which type(s) of business support do you believe would be most useful for obligated businesses, public bodies, and other organisations to ensure they understand their obligations and enable them to recycle more of their waste? (Select any number of responses)

	Very useful	Useful	Neutral	Not useful	No opinion
1:1 support provided/offered to obligated businesses and organisations	x				
National, regional, or local communications campaigns	x				

National guidance and good practice case studies	x				
Dedicated website including online business support tools (e.g., online calculator and good practice guidance)	x				
Other (please specify)	<p>While all of the proposed measures are likely to be of use there is a question over how this support would be delivered and by whom and where the resource necessary would come from.</p> <p>More important to consider feedback from this sector. The business sector is better placed to articulate their actual needs which may in fact vary from business to business.</p>				

- If adopted, and it became a legal requirement for obligated businesses, public bodies, and other organisations to segregate a core list of dry recyclables for collection alongside food waste, how do you believe such regulatory change should be promoted or communicated?

	Please tick all that apply
National, regional, and local communications campaigns i.e., TV adverts, social media campaigns, adverts in trade, national or local press, webinars	x
Guidance and/or notification provided directly to all obligated businesses and organisations via the relevant regulatory bodies (local councils, NIEA) i.e., emails, written notification	<p>Councils are not supportive of taking on regulatory responsibility for compelling businesses to comply with requirements to segregate a core set of dry recyclables and food waste, nor do we have the resources available to do so.</p> <p>Councils have had a long-standing discussion with DAERA regarding concerns over regulatory powers and the incorrect assumption that Councils have the resources necessary to take on additional regulatory/enforcement duties.</p> <p>It seems that rather than addressing their own ability to properly enforce such regulations the Department have shared these powers with Councils and are now seeking to increase the level of compliance within Businesses but with no consideration for their own role in enforcement of these regulations.</p> <p>Councils only collect a small proportion of business waste in Northern Ireland and therefore cannot reasonably be expected to</p>

	<p>regulate a service that sits outside their statutory responsibility to deliver.</p> <p>If DAERA add a legal requirement for obligated businesses, public bodies, and other organisations to segregate a core list of dry recyclables for collection alongside food waste, all communication on this regulatory change should be promoted, communicated, and enforced by DAERA.</p> <p>Councils do not have the staff or financial resources available to take on additional enforcement of waste collection from the NHM sector. DAERA need to take this into account when considering enforcement of any regulations they seek to implement.</p>
Guidance and/or notification provided to obligated businesses and organisations via their existing waste or recycling collector	x
Guidance and/or notification provided to obligated businesses and organisations via relevant trade bodies or umbrella associations, Chambers of Commerce etc. i.e., newsletters, social media, workshops, conferences, or webinars	x
Other (please specify)	

4. Do you have any views on how Government could support businesses, public bodies, or other organisations to procure waste management services more collaboratively?

	Tick all the options which you think should be considered
Promote existing collaborative opportunities relating to waste management so that businesses and NHM producers can access these easier	Council has a fixed price for provision of trade waste collection services and is therefore unlikely to participate in competitive/collaborate/tendering.
Develop new procurement framework opportunities for waste management services that businesses and NHM producers can use collaboratively to gain best value	Council has a fixed price for provision of trade waste collection services and is therefore unlikely to participate in competitive/collaborate/tendering.

Develop standard contract templates that businesses and NHM producers can utilise to collaboratively source waste management services	Council has a fixed price for provision of trade waste collection services and is therefore unlikely to participate in competitive/collaborate/tendering.
Collaborate with key industry organisations or accredited associations to develop waste management framework opportunities suitable to specific industry sectors i.e., transport, retail, hospitality	Council has a fixed price for provision of trade waste collection services and is therefore unlikely to participate in competitive/collaborate/tendering.
Other (please detail and provide examples if possible)	

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

1. Do you agree with our proposal that will require the separate collection of the core set of dry recyclables within 24 months of notification of a statutory requirement?

Yes

No - If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.

24 months for collectors to procure vehicles, containers and mobilise collections may not be long enough.

Unsure

2. Do you agree that small and micro firms should be required to implement a separate collection of the core set of dry recyclables, by the points in time listed below? Tick the point in time which you think should apply.

	Yes	No	If you answered no, please provide the reason for your response with clear evidence detailing why small and micro firms need more time to	Not sure

			accommodate the changes.	
24 months from notification of a statutory requirement				
3 to 4 years from notification of a statutory requirement				
More than 4 years from notification of statutory requirement				
Never				
Other – please detail	X		There needs to be consistency of implementation timeframe across the entire NHM sector.	

3. Are there any other obligated businesses, public bodies or other organisations in your opinion that should be exempt from the proposed requirements? Please provide evidence to support your view.

4. Some waste collectors may not be able to collect the required dry recyclable streams from all obligated businesses, public bodies and other organisations within the timeframe proposed. In this table we set out some circumstances which may delay changes to dry recycling collections. Please select the circumstances which you believe will create challenges and provide evidence with justification detailing why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Collection and treatment contract limitations	Could depend on existing contracts and alignment with a proposed implementation date
MRF infrastructure and/or capacity	Needs investigated to ensure sufficient capacity exists in line with proposed timeframes for implementation.
Container procurement and distribution challenges	X
Reprocessing availability	Potential of capacity within NI and the UK to process material collected for recycling currently. There is an expressed desire in the consultation document to increase closed loop recycling in

	<p>order to achieve environmental and economic benefits. The collaborative network established by a number of NI re-processors currently has a demand for materials from local authority household waste recycling collections. However, for two of the top three NI re-processors, their capacity to re-process the total materials produced from the NI household waste is very limited, Huhtamaki can re-process only 19% of the total paper produced and Cherry Plastics only 18% of the specific plastics they require. The remainder has to be transported to the UK or further afield. All of the materials collected are a resource in both the local and global markets and should be treated as a local and global commodity. Many of the materials collected have no re-processors in NI so there is no closed loop option but we understand that the SIB are considering the promotion of these business opportunities. This area requires substantial development and investment in order improve the NI Circular Economy.</p>
<p>End market volatility/lack of end markets</p>	<p>Remains open to market forces</p>
<p>Cost burdens to collectors of setting up new or expanded collection services</p>	<p>In a Council context this is a very real concern given the additional vehicles and staff that would be necessary to implement such collections</p>
<p>Other – please describe</p>	<p>Vehicle procurement challenges</p> <p>Transfer station/other infrastructure capacity</p> <p>Potential demand for 'bespoke' recycling collections from NHM sector not being compatible with the level of service provided by Councils.</p>

Proposal 24: To review collection zoning and franchising to reduce costs to businesses and NHM premises.

1. Which recyclable waste streams do you believe should be included under a potential franchising/zoning scheme available for use by obligated businesses, public bodies, and other organisations?

For each option, please select whether you agree, disagree, or are not sure/do not have an opinion/not applicable.

	Ag re e	Disagre e	Not sure/No opinion/Not applicable
Dry recyclable material streams (glass, metal, plastic, paper, and card)			Council has no experience of zoning/franchising schemes so cannot offer an opinion in this regard.
Food Waste			Council has no experience of zoning/franchising schemes so cannot offer an opinion in this regard.
Other Items, for example oils, hazardous waste, bulky waste (please specify)			Council has no experience of zoning/franchising schemes so cannot offer an opinion in this regard.

2. Which of the below options, if any, is your preferred for zoning and/or collaborative procurement? Please select only one option that most closely aligns with your preference.

- Encouraging two neighbouring businesses to share the same containers under a contract.
- Encouraging businesses to use shared facilities at a site/estate or equivalent.
- Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in).
- Co-collection – the contractor for household collection services also delivers the NHM service.**
- Framework zoning – shortlist of suppliers licensed to offer services in the zone.
- Material specific zoning – one contractor collects food waste, one dry recyclables, one residual waste.
- Exclusive service zoning – one contractor delivers the core recycling and residual collection waste services for the zone.
- None of the above.
- Other (please detail)**

Council has no experience of zoning/franchising schemes so cannot offer an opinion in this regard however in any circumstance where Council was to offer a recycling or organics collection service to the NHM sector this would need to mirror the service delivered to households.

Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI

Consultation

3. Do you have any views on the roles of stakeholders in implementing a potential zoning/franchising scheme. Please **tick** where you think the named stakeholder should have a role in each of the following activities:

	DAERA	NIEA	Councils	Business Improvement Districts	Environmental Non-Governmental Organisations	Waste producers i.e., businesses, public bodies etc	Trade body, Umbrella Associations, Accredited bodies	Other – please detail
Procurement of services								
Scheme/collection service design								
Admin and day to day management								
Enforcement (ensuring zoning rules are adhered to)								
Business support/advice								
Development of tools & guidance								
Delivery of communications campaigns								
Other activities General feedback								Council has no experience of zoning/franchising

Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI

Consultation

	DAERA	NIEA	Councils	Business Improvement Districts	Environmental Non-Governmental Organisations	Waste producers i.e., businesses, public bodies etc	Trade body, Umbrella Associations, Accredited bodies	Other – please detail
								<p>schemes so cannot offer an opinion in this regard. Council does not have the resources to take on any additional services and enforcement related to NHM waste.</p> <p>Council also note with concern that in a list of key stakeholders for the NMM sector, private sector waste collection companies, who currently provide the majority of services are not even included in the stakeholder table.</p>

4. If you think that there is a role for any other stakeholders not already listed, please name the stakeholder below and state what activities you believe they should be involved in.

Given the majority of collections within this sector are currently carried out by private waste management companies it is difficult to understand why they have not been included in this table. In previous discussions with DAERA Councils have articulated concerns regarding the inflation of their role in 'commercial' type collections and the lack of reporting requirements on private sector waste management companies regarding the waste they collect from their customers.

5. Do you have any further views on how a potential waste or recycling collection franchising or zoning scheme could be implemented?

We consider zoning or franchising will be difficult to deliver and possibly be subject to legal challenge.

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

1. Do you agree that obligated businesses, public bodies, and other organisations would find the provision of commercial waste bring sites useful to facilitate an increase in recycling?

- Yes
 No
 Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

Council is not sure if there is motivation within these sectors to segregate and store waste materials on their premises before bringing them to an external location for recycling or if preference would be for a kerbside collection.

If there was a preference for establishment of commercial waste bring sites issues that would need to be addressed include location, types of materials on site, responsibility for provision and questions around how businesses would pay to utilise such sites under the principles of cost recovery for commercial type waste services.

2. Are there any barriers which we should be aware of, regarding the creation and operation of commercial waste bring sites?

- Lack of suitable location(s) to accommodate commercial waste bring sites.
 Access restrictions – time, availability, vehicular access, noise
 Risk of abuse which may cause recycling containers to fill up quickly.

- Risk of contamination to recyclables meaning collected materials are less likely to be recycled.
- Sites encourage fly-tipping or litter.
- Other (please specify)

Bring sites are traditionally unmanned locations for the deposit of inert materials such as glass, cans and textiles.

Lisburn & Castlereagh City Council has recent experience of attempting to expand the range of materials recycled at unmanned bring sites to cardboard and plastics. This has not been a success as the 'bin' type containers used have been damaged, regularly contaminated and the sites themselves been utilised for illegal dumping.

3. Do you agree that obligated businesses, public bodies, and other organisations should be permitted to use HWRC's to dispose of their waste or recyclables?

- Yes
- No
- Unsure

If you disagree, please detail the reason for this view, supplying evidence to justify your opinion.

While improving access to HRC's could increase recycling opportunities for businesses this access would have to be based on Councils recovering costs. It would also have a significant impact on Councils in relation to the operation of these facilities. HRC's are primarily provided for local householder use. There are already issues at many sites regarding capacity and additional use by local businesses would only further increase these problems. In addition, because businesses need to pay for utilising these sites, implementing or increasing current levels of business use places a greater administrative burden on Council in implementing and overseeing an appropriate payment mechanism. This would have staffing implications both on sites to check and validate business use but also in administrative support services given that no HRC's will implement payment on site due to the potential for fraud/bribery.

Use of HRC's provides opportunities for misuse by the business sector trying to deposit materials generated in the course of their day-to-day business as household waste so as to avoid associated charges. Legislation in NI around charging for waste at HRC's also further compromises Councils ability to charge business such as landscape gardeners and house clearance companies as the waste brought to sites by these businesses comes from a household source and therefore cannot be charged for. This allows commercial users to deposit large volumes of waste FOC at a significant cost burden to the Council and also poses operational difficulties on site. Review of this legislation would be of assistance to Councils to close this loophole. This also needs to be considered under the proposed implementation of digital waste tracking as the current situation is incompatible with proposals around how waste is to be tracked within a digital system.

If a system of HRC type facilities were to be provided for business use this would require significant infrastructure cost and there should not be an automatic assumption that these would be developed and provided by local Councils.

There is also general uncertainty around requirements of digital waste tracking and the implications for the use of these HRCs by commercial users. There may be a need for significant investment to facilitate this which could make commercial use impractical.

It is unlikely that many existing HRC's would have the infrastructure necessary to open them up to large scale business use e.g. weighbridges, staffing levels and other supporting infrastructure to capture data and differentiate waste from both domestic and NHM sources.

If you agree, what benefits do you believe access to HWRCs will provide to obligated businesses, public bodies, or other organisations? (Select as many benefits as are appropriate)

- HWRC access will provide a trusted, legitimate disposal route for our waste and recyclables.
- HWRC access will provide a cost-effective disposal route for our waste and recyclables.
- HWRCs will provide access to disposal routes for our waste and recyclables at times which suit our organisation (in line with the opening hours of the facility)
- HWRC access will enable us to recycle more of our waste due to the range of accepted materials.
- Other (please specify)

Use of the word 'our' above - the waste and recyclables are produced by the obligated businesses, public bodies, or other organisations and therefore are their responsibility to manage.

4. Are there any barriers, which we should be aware of, should HWRCs be made accessible to obligated businesses, public bodies, and other organisations?

- HWRC network has limited capacity for waste or recyclable storage - would be unable to accept predicted increase in volumes.
- Council(s) has/have insufficient resources to handle the anticipated increase in numbers of visits, waste volumes, payments or permits needed to cope with acceptance of commercial waste or recyclables.
- Existing Environmental Permit or planning condition for HWRC network would not permit a service expansion.
- Other (please specify)

There is also uncertainty around requirements of digital waste tracking and the implications for the use of these HRCs by commercial users. There may be a need for significant investment to facilitate this which could make commercial use impractical.

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

1. Do you agree that our proposal to extend Article 5 of the Waste & Contaminated Land (NI) Order 1997 will be sufficient to ensure compliance with the proposed requirements to segregate a core set of dry recyclables and food waste by obligated businesses, public bodies, and other organisations?

- Yes
- No
- Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

Through the CWF and GWWG Council has articulated concerns regarding Article 5 powers that remain outstanding and need to be properly addressed.

Councils are not supportive of taking on regulatory responsibility for compelling businesses to comply with requirements to segregate a core set of dry recyclables and food waste, nor do we have the resources available to do so.

Councils have had a long-standing discussion with DAERA regarding concerns over regulatory powers and the incorrect assumption that Councils have the resources necessary to take on additional regulatory/enforcement duties.

It seems that rather than addressing their own ability to properly enforce such regulations the Department have shared these powers with Councils and are now seeking to increase the level of compliance within Businesses/NHM Sector but with no consideration for their own role in enforcement of these regulations.

Councils only collect a small proportion of business waste in Northern Ireland and therefore cannot reasonably be expected to regulate a service that sits outside their statutory responsibility to deliver.

If DAERA add a legal requirement for obligated businesses, public bodies, and other organisations to segregate a core list of dry recyclables for collection alongside food waste, all communication on this regulatory change should be promoted, communicated, and enforced by DAERA.

Councils do not have the staff or financial resources available to take on additional enforcement of waste collection from the NHM sector. DAERA need to take this into account when considering enforcement of any regulations they seek to implement.

2. Do you agree that the existing penalty of £300 for non-compliance for obligated businesses, public bodies and other organisations is severe enough to ensure compliance?

- Yes
- No
- Unsure

If you have answered No, what value do you feel the fixed penalty notice for non-compliance should be increased to?

Proposed new penalty value	Please select one answer
£400	
£500	
£600	
£700	

If you believe another value should apply to fixed penalty notices for non-compliance, please specify the value you feel the fixed penalty should be set at and explain why, as well as providing supporting evidence.