

Consultation on Meeting EU Landfill Diversion Targets

Comments by

Northern Ireland Environment Link

7 October 2010

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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We thank you for the opportunity to make these comments. We hope that you find them helpful and that they will be taken into account in your decision. If you would like to discuss them further please do contact us.

We strongly welcome the revision of the definitions in line with EU to include more of the commercial and industrial wastes. Waste needs to be treated in an integrated fashion, and differentiating between origins as opposed to content and potential recycling usages can be counterproductive to encouraging the most efficient recycling options. In all aspects we would urge the consideration of how different waste streams (including sewage and agricultural wastes) can be managed in a coordinated fashion to deliver the best recycling outcomes.

Q. 1: Which of the possible approaches to reporting on the amount of BMW sent to landfill should the Department develop further? Is it right to favour measuring a landfill target at the point of landfill, provided a robust and credible method can be determined?

NIEL believes that the Department should have a more robust method for monitoring the amount of waste at the various levels of the hierarchy, including waste prevention, as a major tool in promoting more sustainable waste management; what gets measured gets addressed. However, we do realise that there are issues with this in the responsibility of who reports the data and the detail that is put into the reports, as well as fundamental difficulties in measuring 'prevention'.

New mechanisms for reporting are likely to encourage greater separation and less usage of 'mixed' waste categories, which will have positive impacts on the ability to recycle such separated materials.

In paragraph 4.17 of the consultation document, it states that "BMW could be measured at the point of landfill". This is a very feasible and sensible way of measurement of BMW to landfill as this documentation and reporting should already be held but the landfill operators in the first instance. From this, paragraph 4.20 of the consultation document provides that landfill operators may be obliged to assess the biodegradable content of their mixed waste that they receive. This again puts responsibilities on the landfill operators for something that should be possible, though admittedly not always easy.

Q. 2: Are there alternative approaches that the Department should be considering?

It is right to favour measuring a landfill target at the point of landfill, providing a credible measurement method of different materials. There is an issue of waste prevention methods which never reach landfill and how they can be quantified (e.g. home composting, diversion to AD schemes, etc.) which should be strongly promoted and therefore need to be reckoned into achievement of targets.

Provisionally, the methods that are being proposed in the consultation document seem to be the most feasibly minded in the short to medium terms. However, at all

times waste diversion from landfill should be promoted and implemented by all District Council so that the amount of waste generated can be minimised.

Q. 3: Do you think that NILAS is an effective policy to assist NI in meeting its share of the UK landfill diversion target in:

- a) 2013
- b) 2020

Please provide evidence to support your views if possible. In particular it would be useful to know the role NILAS plays in the future planning by District Councils/ waste management groups to divert waste from landfill.

The purpose of NILAS is to ensure that the total amount of BMW in NI does not exceed the EU targets. NILAS has been effective in the past in assisting NI meeting Landfill diversion targets and in combination with other policies has increased recycling rates by 8.6% (2008/09) since NILAS was introduced in 2005. NILAS has also been effective in that the 2010 and 2013 targets are on course to be met.

However, NILAS may not play as significant role in the future if it continues to be adopted by the Department because other options of landfill diversion may be focused on by District Councils, such as the implementation of waste to energy facilities (AD, incineration, gasification, etc.). The fact that it does not address all of the new categories included indicates that it can only be one of several tools, not the only tool.

Landfill tax is another policy which needs to be used, with escalating fees, as the polluter pays and producer responsibly initiative should be strong drivers for local action. Much greater attention should be paid to waste prevention and recycling/reuse of biodegradable waste, and campaigns and programmes such as Love Food Hate Waste and Fare Share have a major role to play in meeting our targets and moving biodegradable waste management 'up' the hierarchy. Landfill Tax and landfill tax credits should be used to fund these imaginative and evocative initiatives to deliver huge benefits to diversion of biodegradable waste from landfill.

Q. 4: What policy instruments should the Department consider in its assessment of those necessary to meet the landfill diversion targets in 2010 and 2020? Please provide evidence to your response if possible.

Major drivers include the Waste Framework Directive targets and financial incentives, coupled with likely global increases in food prices and probable introduction of GHG targets and carbon pricing. These should all change the way we view and treat waste, and will encourage movement 'up' the hierarchy.

Q. 5: Are there any other policy options specifically to divert biodegradable municipal waste from landfill that the department should be considering?

Fiscal drivers coupled with provision of infrastructure and publicity campaigns are likely to be required to assist councils in encouraging those producing waste to

treat it effectively for efficient recycling or other treatments. All of these take time to introduce and prompt research and action are required if they are to fully deliver the target reductions.

Q. 6: Do you agree with the proposal to create the concept of “Collected Waste” as a means of NILAS continuing in its current form as a policy addressing waste collected by District Councils.

Agreed.

Q. 7: Is “Collected Waste” the best term, or is there a better alternative?

Agreed.

Q. 8: Do you agree that allocations of landfill allowances to District Councils should be retained as currently allocated for each NILAS scheme year?

Agreed in theory as a mechanism; in practice these allowances need to be decreased year on year to drive reduction.

Q. 9: Do you think targets for BMW to landfill should be set in non-target years, and if so, on what basis?

It is essential to have targets for non-target years to drive changes in a gradual manner and to have a better chance of meeting the targets, avoiding temptations to avoid the issue until the target is upon us.

Equality, Human Rights and Rural Proofing

No comments