

# ***Introduction of Restrictions on the Landfilling of Certain Wastes***

***Comments by***

**Northern Ireland Environment Link**

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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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NIEL strongly supports the consideration of landfill bans as part of the solution to waste management in Northern Ireland, both as we are committed to under the Waste Framework Directive and as part of our obligation to addressing greenhouse gas emissions. We believe that banning specific types of waste from landfill will require that people be educated about the recycling and waste prevention and that suitable infrastructure (recycling collections, home compost bins, packaging restrictions) are in place to facilitate their understanding and delivery of the desired outputs.

In all cases the ban itself is most useful as a means to drive behavioural change and source separation of materials to ensure that all of these resources are utilised to their full potential. The requirement for source separation is thus key to proper waste management

The difficulties of a ban in terms of household waste are clear; even the most eco-friendly household occasionally throws out jars of rotten food, etc. Therefore bans may need to be 'practical' in their interpretation as to definitions.

**Paper-** We support the case for a landfill ban with a sorting requirement on paper as we believe that it is too useful of a resource. As the consultation document states, Green Alliance and Eunomia research both found the landfill ban of paper would have desirable, practical and financial benefits. However, the necessary infrastructure has to be put in place for this ban to be implemented in a sustainable manner, and this could be a difficulty in implementing a ban on paper being deposited in landfill. The appropriate infrastructure should be put in place before any ban is implemented. People need to be educated in a way that teaches them the way that it *has* to happen, rather than the possibility that it *might* happen. This must start at the grass root levels of the households, communities and businesses.

**Food-** We support the case for a landfill ban with a sorting requirement on food waste because of the major climate change and pollution impacts which biodegradable material has in landfill. The composting of food waste also has major benefits, and with the Department investing in technology to recycle and compost 60,000 tonnes per annum of food and garden waste, has led to the production of high quality compost which is compliant with PSA 100 standards. However, there are practical difficulties in implementing a landfill ban on food (and garden) waste. Again, this difficulty comes down to having the available infrastructure in place and the communications mechanisms which are required to deliver a change in behaviour.

**Textiles-** We support the case for a landfill ban on textiles, with much more work needing to be done to promote the re-use and recycling of clothes. In 2007, Defra established that with the 2 million tonnes of textile waste, that just under half of the waste was disposed to landfill. Support for community based recycling and reuse projects can be highly successful in diverting textiles from landfill and in encouraging high recycling rates through recognition of the social benefits in addition to the environmental ones.

**Metals-** Ferrous metals already achieve a high level of recycling. As there are already a number of producer responsibility schemes in place, these could be set on a mandatory basis rather than a voluntary basis. This would ensure that businesses are disposing of waste in a professional and practical manner. In the long term, a landfill ban on metals could be implemented; however Defra and the Devolved Administrations have already published a consultation with encouraging recycling targets for steel and aluminium which augurs well for the future.

**Wood-** A landfill ban on wood depends on the development of a suitable incinerator with an energy recovery facility and this consultation document states that there are a number of wood to energy projects in the early stages of development which would go a long way to achieving the overall goal of a complete ban of wood to landfill in the future.

**Green (garden) Waste-** As with food waste, the environmental benefits of a landfill ban on green (garden) waste, and diverting the waste to anaerobic digestion and composting is very positive, and possible. As there is already a good level of knowledge with the public around the composting and re-use of garden waste in such a positive manner, the District Councils have an opportunity to encourage this further with the positive incentives first, before a landfill ban is introduced. The work that has already been done by District Councils should be supported

**Glass-** As it may be quite complex to introduce a landfill ban on glass, the possibility of introducing a tougher sorting process could be implemented in the medium term to achieve the possible long term goal in the future of a complete ban on glass disposed in landfill sites.

**Plastics-** While a complete ban may be difficult, many steps should be made to encourage greater recycling of plastics and to reduce the plastic packaging which cannot be recycled; even if not economically cost effective in the short term consideration should be given to encouraging the recycling of all such plastics to encourage consumers to recognise their value and institute behavioural change towards recycling. Similarly, manufacturers and packagers should be encouraged to develop more easily recycled packaging. As with all materials, a combination of infrastructure and communication messages are key.

**Waste Electrical and Electronic Equipment (WEEE)** – Although the research indicated that this was not a cost effective ban, it should still be considered due to the high level of toxicity and value of the resources, plus the current general understanding that these are valuable materials.

**Biodegradable wastes-** We feel that this should be considered due to the toxicity of the product and its impact on GHGs. Changing values for carbon credits or costing of carbon could shift analysis to positive.

**Non-segregated wastes-** A requirement to sort would give more certainty to a ban on non segregated waste and so would result in significant environmental benefits. This therefore would expect to increase investor confidence in the provision of the relevant infrastructure.

**Other waste types that should be subject to a landfill ban-** We believe that bulky items like household furniture should be banned from landfill. In Dublin, a number of private companies are working with the City Council to re-use and re-sell furniture that people want to throw away. Although a number of small scale projects are in operation to restore and re-sell furniture in Belfast, Lisburn and other District Councils, major support should be provided to deliver social and economic as well as environmental benefits.

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.