

Waste Prevention Programme 2019

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 natural and built environment of Northern Ireland. Its 65 Full Members represent 190,000 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 made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be happy to do so.

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General Comments

NIEL welcomes the opportunity to engage with the Department on the 2019 Waste Prevention Programme, “Stopping Waste in its Tracks”. In line with the principles of the waste hierarchy, measures to prevent waste should be afforded the highest priority – this should be reflected within policy and in future investment decisions. The prevention of waste is a core component in realising Northern Ireland’s transition to a Circular Economy.

NIEL agrees that one of the best ways to reduce waste is to “prevent it from being created in the first place”. Efficient and environmentally-conscious product design and packaging will be instrumental to preventing waste. Waste prevention can also be used to avoid problems later in the waste management process. For example, waste disposal via landfill or incineration can be circumvented by excluding from manufacturing processes materials which are expensive, difficult or impossible to recycle.

The Department should identify key areas where improvement is needed (e.g. food waste, electrical waste) and devise plans to ensure overall waste reduction and higher rates of collection. This may be achieved by a variety of measures – by working with producers and retailers to help reduce their waste, through awareness raising, by introducing incentives/disincentives and enforcing penalties for non-compliance.

Much of our waste legislation and targets are set at an EU level. As the UK prepares to leave the European Union it is essential that the good progress made in the last decade is maintained and built upon, with ambitious targets set for waste reduction and recycling after Brexit. At a minimum, Northern Ireland should continue to meet European standards and targets, even if and when the targets change, and consider the application of any future EU waste legislation into local legislation.

Whilst it has been stated that the Waste Prevention Programme “*does not seek to introduce any new waste prevention policies*”, NIEL firmly believes that the Northern Ireland economy needs to urgently move away from the largely linear system on which it is currently based and its over-reliance upon finite resources. This can only be achieved by making fundamental changes to how we manage our waste.

Stimulating a culture of resource efficiency

Whilst it is encouraging that the volume of waste sent to landfill has decreased year-on-year, it is concerning that total waste arisings have increased from 5.9m tonnes in 2009 to 6.7m tonnes in 2016. This increase is not sustainable and further emphasises the need for a Circular Economy approach to waste.

More effort is required to reduce the total volume of non-recyclable and unnecessary waste produced in Northern Ireland – in particular, NIEL would support action on “problem plastics”¹. By introducing bans, levies or financial incentives, the Department can encourage producers to adopt more environmentally-friendly alternatives. NIEL supports the Welsh Government’s proposed ban on single-use plastics from 2021² including balloon sticks, plastic cutlery, polystyrene and false “solutions” like oxo-degradable plastic. This approach must be consistent across the devolved administrations.

NIEL welcomes the Department’s pledge to design and implement Extended Producer Responsibility (EPR) schemes which aim to “reduce the amount of unnecessary and difficult to recycle goods”. EPR schemes should also ambitiously incentivise businesses to introduce innovative, packaging-free product delivery solutions.

Many companies are starting to realise the opportunities presented by reducing waste. Waste reduction can offer considerable savings – both in production costs and in waste collection and disposal costs e.g. landfill tax. The Department should seek to highlight these cost saving opportunities and share best-practice examples that contribute to a circular economy.

Encouraging reuse and repair of products

Waste Electrical and Electronic Equipment (WEEE) has become the fastest growing waste stream due to the proliferation of mobile phones, tablets and other electronic devices. Due to the complexity of WEEE, there is limited capacity for processing this waste stream, especially in NI. This has led to NI, and other parts of the UK, exporting electronic waste to a range of countries including China, Nigeria and Pakistan for processing and/or recycling which in some cases employ methods which often fall below relevant EU environmental and health and safety standards. In fact, according to research by the Basel Action Network (BAN) the EU country that exported the most electronic waste was the UK and along with Germany, Italy, Ireland, Poland and Spain, the UK allowed electronic waste exports to developing countries which are likely to be illegal³.

¹ <https://www.wrap.org.uk/content/eliminating-problem-plastics>

² <https://www.theguardian.com/environment/2020/mar/18/welsh-government-plans-ban-single-use-plastics-next-year>

³ http://wiki.ban.org/images/f/f4/Holes_in_the_Circular_Economy-_WEEE_Leakage_from_Europe.pdf

To try to tackle this problem of exporting electronic waste, NIEL believes that producers and manufacturers should be encouraged to implement and advertise “take back” schemes whereby old products can be returned with a view to reusing components and materials. Producers should offer incentives for customers to return old hardware e.g. a deposit return scheme for electronic goods, store credit or discounts for a replacement.

NIEL is supportive of the recent EU legislation on the “Right to Repair” principle⁴ whereby manufacturers are obliged to design domestic appliances to an improved standard – guaranteeing ease of disassembly, repair and a longer life expectancy. NIEL would like to see this principle applied in Northern Ireland, regardless of the outcome of Brexit – as in the rest of the EU.

The Department should seek to support “Repair Cafes” throughout NI to help enstil a positive culture of reuse, repair and refurbishment in contrast to the unsustainable throwaway culture of “take-make-use-dispose”.

Developing and supporting information and awareness campaigns

The recently published 2019/20 Litter Composition Report⁵ has revealed 1.3 million items of litter are on our streets at any one time. The cost of street cleansing in Northern Ireland was £45.5m in 2017/18 and is rising annually⁶. Litter directly impacts on tourism, health, and the environment with associated costs almost doubling this figure. With 1 in 3 people in Northern Ireland openly admitting to littering, more needs to be done to effectively communicate the environmental, societal and economic cost of littering⁷.

NIEL welcomes the progress made in recent years to increase the breadth and quantity of recycle collected. It is essential that good communication is maintained with households and businesses to ensure that recyclable materials are not being disposed of as general waste. The Department should seek to use social media, websites, television and radio advertisements to promote good waste management practices in the workplace and at home. NIEL would encourage the Department to work closely with Keep Northern Ireland Beautiful and the Waste and Resources Action Programme (WRAP) to help inform and educate the public on the value of waste as a resource.

Consideration should be given to the standardisation of recycling across all council areas (based on the broadest collection regime possible). This should improve collection rates by removing uncertainties on what can and can’t be recycled within a given council area.

⁴ <https://www.bbc.co.uk/news/business-49884827>

⁵ <https://www.keepnorthernirelandbeautiful.org/keepnorthernirelandbeautiful/documents/blog-000968-20200228111517.pdf>

⁶ <https://www.nienvironmentlink.org/cmsfiles/Council-Spending-Press-Release.pdf>

⁷ Ibid

Improving producer responsibility schemes and encouraging less waste generation

Plastic packaging makes up 2 of the top 3 most frequently encountered litter items. Whilst local councils can impose fines for littering, it is also incumbent upon producers to offset the environmental damage caused by their activities.

The Department should seek to provide incentives to producers seeking to reduce the volume of waste produced. In particular, NIEL would strongly support a wholesale transition away from a system reliant on single-use packaging, primarily through waste prevention and reusable packaging solutions, rather than a simple substitution of one single-use material for another. Furthermore, we advocate that the Extended Producer Responsibility principles should be designed to ensure that producers internalise the full life cycle costs of packaging materials. Currently, “costs” are defined purely as those related to waste management services, whereas there are environmental and social risks at each stage of the life cycle for all packaging materials – from extraction, to production and transport, through to consumption and disposal.

NIEL welcomes the Department’s commitment to “Enhanced Eco-Labelling” under Action 3 (pg.17). The current voluntary system of labelling has created confusion amongst consumers as labels are often absent from packaging that cannot be recycled. Labelling should be mandatory, consistent and easily understood to enable consumers make informed choices about what products they purchase. Enhanced Eco-Labelling could also have the added benefit of improving recycling collection rates.

NIEL is strongly supportive of a Deposit Return Scheme (DRS) for Northern Ireland. A DRS is essential to deliver the necessary behavioural change to tackle litter and increase recycling. Single-use plastic, cans and glass bottles are one of the most commonly littered items⁸ and pose a serious threat to terrestrial and marine life. We believe that a DRS will help prevent litter through monetary incentive – and furthermore, assist in the collection of high-quality material for reuse.

⁸ <https://www.theguardian.com/environment/2019/nov/28/more-than-16000-cans-and-bottles-found-in-four-days-on-uk-beaches>

Programme Aim, Objectives and Areas for Action

NIEL is supportive of the overall programme aim, objectives and actions listed within the proposed Waste Prevention Programme.

In addition to the actions listed, we propose:

- A Deposit Return Scheme for Northern Ireland which targets the most frequently littered drinks containers – aluminium cans and plastic bottles
- Bans on the manufacture and sale of material which cannot be recycled e.g. polystyrene
- A 5p increase in the Carrier Bag Levy (to 10p) and the introduction of levies on other frequently littered items beyond the scope of a DRS e.g. single-use coffee cups
- Grants to support research into waste prevention, plastic alternatives including biodegradable or compostable plastics such as corn starch plastics, environmentally-friendly packaging and behaviour change
- Support for Green Key⁹ as an Eco-Tourism/Eco-Hotel programme to compliment the other “Eco” programmes within the Waste Prevention Programme
- Collaboration with local councils to achieve standardisation of recycling across all council areas (based on the broadest collection regime possible)
- The setting of clear SMART targets, with milestones, for the reduction and ultimately the elimination of various single-use waste streams. For example, in relation to fossil fuel derived plastic waste, targets should be set for the reduction of this waste stream by a combination of factors including the reducing amount of production (avoidance) of the waste accompanied by the replacement of increasing amounts of it by organic based biodegradable or compostable waste, leading to a complete elimination of fossil fuel derived plastic waste by a date to be agreed, say 2030.

⁹ <https://www.keepnorthernirelandbeautiful.org/cgi-bin/generic?instanceID=55>