

Waste Management Plan for Northern Ireland

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 65 Full Members represent over 100,000 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 Waste Management Plan for Northern Ireland. Combining existing waste policies and plans under the WMPNI umbrella should be viewed as an opportunity – to create a “one-stop-shop” for waste legislation and to provide added clarity to businesses and the waste and resource management sector.

We would ask the Department to consider renaming the WMPNI to the “Waste & Resource Management Plan for Northern Ireland” to acknowledge Northern Ireland’s aspiration to transition to a Circular Economy. It could be argued that “waste” only refers to material which is of no economic value and is to be discarded – this does not reflect the wider activities of the waste and resource management sector.

Much of our waste legislation and targets are set at 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 and consider the application of any future EU waste legislation into local legislation.

Whilst it has been stated that the WMPNI does not *“introduce new policies or...change the landscape of how waste is managed”*, NIEL firmly believes that the Northern Ireland economy needs to urgently move away from the largely linear system on which it is based and its over-reliance upon finite resources.

We believe the WMPNI needs to:

- Tackle the consumption issue (which is ethical as well as environmental) and work towards a circular economy for Northern Ireland.
- Ensure a holistic approach to the circular economy – including smart regulation, market-based instruments, research and innovation, incentives and disincentives, measures of performance, and information exchange.

- Demonstrate that Northern Ireland remains committed to delivering our targets for emissions, waste and recycling. This will help build Northern Ireland's clean, green image as an attractor for inward investment.

Improving the efficiency of resource use and ensuring that waste is valued as a resource can contribute to reducing dependency on importing raw materials, the exportation of our waste, and help the transition to more sustainable material management and to a circular economy model.

Sound and efficient waste management systems are an essential building block of a circular economy. In Northern Ireland there is growing understanding and ambition to work towards creating a prosperous circular economy, creating more opportunity for sustainable consumption and production, including increased economic activity and job creation.

The WMPNI must enable citizens and economic activity to prosper through clear and action-led commitment. This includes following up on cross-departmental recommendations made for increasing circular economy activity within and by government both directly and through policy development.

Furthermore, the Department must ensure that NI's circular economy policies align with the objectives of the EU Circular Economy Package which will help to provide:

- Waste prevention and resource efficiency overall
- Effective management of plastics
- Creation of economic opportunities along the supply chain
- Adequate provision to monitor and evaluate impact and benefits
- Improved citizen awareness and commitment through behavioural change, interventions and effective communication
- Reduction of marine littering

Current Waste Management Situation

In paragraph 2, page 9, reference is made to the Circular Economy Package of Directives being subject to “*when governance arrangements allow*”. NIEL is concerned that the absence of the NI Assembly is preventing progress in this area. Northern Ireland has already signed up to international commitments on waste and resource efficiency under the UN Sustainable Development Goals, (SDG11 and SDG12 are of particular relevance) as well as the EU action plan for the Circular Economy. It is also firmly within the public interest to progress CEP in order to protect our environment, conserve our resources and provide cost-saving opportunities to businesses.

The Waste Hierarchy

NIEL supports the principles of the “Waste Hierarchy” as it appears within the Waste Regulations (Northern Ireland) 2011. We agree that the benefit of adhering to the hierarchy has both environmental and economical benefits. We would encourage a further narrowing of the “disposal” wedge through further investment in recycling and recovery facilities, and by decentivising the use of materials that are difficult and/or expensive to recycle.

NIEL is also supportive of the recent EU legislation on the “Right to Repair” principle¹ whereby manufacturers are obliged to design domestic appliances to an improved standard – guaranteeing ease of repair and a longer life expectancy. We would to see this principle applied in Northern Ireland, regardless of the outcome of Brexit – as in the rest of the EU.

The Polluter Pays principle

The cost of street cleansing in Northern Ireland was £45.5m in 2017/18² and is rising annually. Litter directly impacts on tourism, health, and the environment with associated costs almost doubling this figure. Plastic packaging makes up 2 of the top 3 most frequently

¹ <https://www.bbc.co.uk/news/business-49884827>

² <https://www.nienvironmentlink.org/cmsfiles/Council-Spending-Press-Release.pdf>

encountered litter items. Whilst local councils can impose fines for littering, it is also encumbent upon producers to offset the environmental damage caused by their activity. NIEL agrees that the Department should seek to provide incentives to producers seeking to reduce the volume of waste produced. In particular, we 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.

Fines for waste crime e.g. illegal dumping, fuel laundering etc should be proportionate to the cost of remediation. For enforcement action to be effective, penalties should be substantially more costly – to individuals and companies – than the cost of legal compliance.

Waste Arisings

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 unrecyclable and unnecessary waste produced in Northern Ireland – in particular, NIEL would support action on “problem plastics”³. By introducing bans, levies or financial incentives, the Department can encourage producers to adopt more environmentally-friendly packaging.

³ <https://www.wrap.org.uk/content/eliminating-problem-plastics>

NIEL welcomes the recognition that improvements to data collection are required – this will allow the Department to provide a more accurate picture of waste streams in Northern Ireland and help provide greater certainty when prioritising interventions.

Waste Services

NIEL welcomes the progress made in recent years to increase the breadth and quantity of recyclate 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 supports the Department's continued assistance to local councils via the Waste Recycling Collaborative Change Programme. 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.

Assessment of need for new collection schemes and infrastructure

In line with the principles of the waste hierarchy, prevention, reuse and recycling infrastructure should be prioritised over energy-from-waste, landfill and incineration installations – this should be reflected in future investment decisions. NIEL agrees with the “principle of proximity” as outlined in the revised Waste Framework Directive – whilst NI is limited by geographic scale, it should seek to maintain a degree of “self-sufficiency” in waste disposal and the recovery of waste. This is particularly important given recent international restrictions placed on the export of waste.

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. Despite the absence of Ministers, mechanisms should be sought to deliver this scheme in NI to ensure that standards here do not differ from those in the rest of the UK.

Single-use plastic, cans and glass bottles are one of the most commonly littered items⁴ 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.

Evaluation of the development of waste streams in the future

NIEL broadly agrees with the aims and commitments listed on pg.34. NIEL believes that the CEP municipal recycling target of 65% by 2035 is both desirable and achievable. The Department should identify key areas for improvement (e.g. food waste) and devise plans to ensure higher rates of collection and overall waste reduction – this may be achieved by a variety of measures – by working with producers and retailers to help reduce their waste, through awareness raising, and by introducing and enforcing penalties for non-compliance.

NIEL would encourage regular evaluation of waste streams, whilst taking account of international developments e.g. earlier in 2019, China stopped accepting plastic waste exports below 99.5% purity⁵ - this approach has been replicated elsewhere. This emphasises the need for localised recycling and a reduced dependency on single-use plastics.

NIEL welcomes the proposal to improve waste tracking data, this will enable smarter and more efficient management of our waste streams in the future.

NIEL agrees that a revised NI Waste Management Strategy is required and should include new waste and recycling targets for 2035, a Deposit Return Scheme for Northern Ireland, Extended Producer Responsibility arrangements, and measures relating to all forms of littering.

⁴ <https://www.theguardian.com/environment/2019/nov/28/more-than-16000-cans-and-bottles-found-in-four-days-on-uk-beaches>

⁵ <https://www.bbc.co.uk/news/world-48444874>