



<b>Title of Report:</b>	<b>DAERA Consultation – Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI</b>
<b>Committee Report Submitted To:</b>	<b>Environmental Services</b>
<b>Date of Meeting:</b>	<b>11<sup>th</sup> June 2024</b>
<b>For Decision or For Information</b>	<b>For Information</b>
<b>To be discussed In Committee YES/NO</b>	<b>No</b>

<b>Linkage to Council Strategy (2021-25)</b>	
Strategic Theme	Climate Change and our Environment
Outcome	Increasing proportion of domestic and commercial waste recycled
Lead Officer	Head of Operations

<b>Budgetary Considerations</b>	
Cost of Proposal	N/A
Included in Current Year Estimates	
Capital/Revenue	
Code	
Staffing Costs	N/A

<b>Legal Considerations</b>	
Input of Legal Services Required	No
Legal Opinion Obtained	No

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	N/A	Date:
	EQIA Required and Completed:	N/A	Date:
Rural Needs Assessment (RNA)	Screening Completed	N/A	Date:
	RNA Required and Completed:	N/A	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	N/A	Date:
	DPIA Required and Completed:	N/A	Date:

## **1.0 Purpose of Report**

- 1.1 The purpose of this report is to advise Members on the consultation entitled 'Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI' published by Department of Agriculture, Environment & Rural Affairs (DAERA).

## **2.0 Background**

- 2.1 Consultation opened on 7<sup>th</sup> March and closes on 27<sup>th</sup> June 2024.
- 2.2 The consultation invites views on proposals aimed at improving the quality of household and non-household municipal recycling, how to improve reductions in food waste, how to cut landfill rates and how to get businesses on board to increase recycling rates.
- 2.3 The aim of the consultation is to bring forward new policy options for the DAERA Minister to consider. Proposals and questions focus on issues such as how new measures might best be implemented, considering views on practicality, economic barriers and how the future of recycling in Northern Ireland might look.
- 2.4 The consultation has been collaboratively designed, building on several policy options based on responses to the 2020 'Future Recycling & Separate Collection of Waste of a Household Nature in NI' discussion document.

The proposals in the consultation are designed to maximise the benefits of recycling to the environment and to the local economy. This includes looking at options for making improvements to the ways material is collected from households and increasing recycling from businesses and producers of non-household municipal (NHM) waste.

- 2.5 Consultation document and associated information can be viewed at <https://www.daera-ni.gov.uk/consultations/rethinking-our-resources-measures-climate-action-and-circular-economy-ni-consultation>.
- 2.6 Response to consultation can be found in Appendix 1.

## **3.0 Legislation**

- 3.1 The EU Circular Economy Package (CEP), which the UK committed to prior to EU exit, was transposed into domestic legislation in December 2020 via the Waste (Circular Economy) (Amendment) Regulations (Northern Ireland) 2020.

This amended the content of the Waste and Contaminated Land (Northern Ireland) Order 1997 and introduced a range of targets including a municipal waste recycling target of 65% by 2035 (with interim targets of 55% by 2025 and 60% by 2030) and municipal waste landfill target of 10% or less by 2035.

- 3.2 The legislation also extended the definition of ‘municipal waste’ to include waste collected from other sources other than households where the waste is similar in nature and composition.

This means that most businesses, public sector and third sector organisations are now in scope of this revised definition. In addition to these targets, there is also a new recycling target arising from the Climate Change Act (NI) 2022, which requires Northern Ireland to achieve a 70% waste recycling rate by 2030.

#### **4.0 Recommendation**

**It is recommended** that the Environmental Services Committee approves the consultation response entitled ‘Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI’ published by Department of Agriculture, Environment & Rural Affairs (DAERA).



# Rethinking Our Resources:

Measures for Climate Action  
and a Circular Economy in NI

Questions

March 2024



Department of  
**Agriculture, Environment  
and Rural Affairs**

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)

***Sustainability** at the heart of a living,  
working, active landscape  
valued by everyone.*

## Annex - Questions posed via Citizen Space for consultation.

### GENERAL

What is your name?

What is your email address?

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

**Yes.** Skip to Question 5

No

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

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.

Northern Ireland Local Government Association

## 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

**CCGBC agrees that there is a need to restrict residual waste to encourage increased recycling, on the proviso that household needs are met where greater capacity is accepted to be necessary.**

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	
Procurement processes for new containers	X
Manufacturing capacity for new containers	X
Projects outcomes from residual waste reduction action	
Cost burdens	X
Ability to resource & mobilise within the required timescale	
Other - please describe	
<p><b>If all Councils are moving at the same time sourcing bins may be an issue. The purchase of equipment will require additional costs. These costs will have to be included in annual estimates and then there could be a lead in time for delivery, resulting in the project taking longer than 24 months.</b></p>	

2. 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.

**Although going to 180 litre fortnightly is the easiest to implement, a 3 weekly collection will not only reduce the residual capacity but also reduce collection costs.**

3. 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.

**CCGBC is of the view that this policy would apply to everyone.**

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.

**Ideally yes, but this will be heavily influenced by funding availability.**

4. 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
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Household comprises more than 6 residents.	Yes	If selected, please define the number of citizens in a 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.	Yes	If selected, please provide evidence to justify your response.		
Households where there are more than two children using disposable nappies.	Yes	If selected, please provide evidence to justify your response.		
All households in the collection subsequent to the Christmas break, where presentation of a restricted amount of side waste is acceptable.		If selected, please provide evidence to justify your response, including details on the quantity of side waste that could be accepted.	No Collection of side waste presents a serious Health and Safety issue and is not acceptable Councils adjust collection dates to ensure extra Christmas waste is covered.	
Other (Please detail). If selected, please provide evidence to justify your response.				



**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.	Yes		
Glass bottles and jars - including drinks bottles, condiment bottles, jars, etc. and their metal lids.	Yes		
Metal packaging: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes.	Yes		
Plastic: bottles including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays; plus cartons (such as Tetrapak®).	Yes		

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

**CCGBC have an MDR contract in place. If the collection system remains as mixed dry recyclables collection ie blue bin then there will be no change therefore not applicable. If the system changes to kerb box then 24 months is not adequate time as per reasons already stated ie funding, procurement, staffing levels.**

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.	
Sorting or reprocessing.	
Procurement processes for new containers or vehicles.	
Manufacturing capacity for new containers or vehicles.	
MRF infrastructure or capacity.	
Container distribution	
End Market volatility/lack of end markets.	
Other - please describe. <b>No – if the system changes to source segregated ie kerb box rather than the current blue bin then financing, procurement, staffing will mean not achievable in 24 months.</b>	

**Our member councils will provide specific (local) details in their responses.**

**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).

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.	Not explicitly included in contracts
Sorting or reprocessing.	
Procurement processes for new containers or vehicles.	
Manufacturing capacity for new containers or vehicles.	
MRF infrastructure or capacity.	
Container distribution.	
End Market volatility/lack of end market.	Yes – lack of visibility on these.
Factors relevant to collections from flats and houses in multiple occupation, where citizens share communal containers.	
Other - please describe	
Potential delays to implementation of EPR payments, and related lack of visibility on financial arrangements.	

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.

**CCGBC agrees with this proposal in theory but more information will be necessary prior to further changes eg proposed timeframe, outworkings of review and effect on contracts, whether review decisions are binding**

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.

**Yes, accompanied by sufficient led-in times, resourcing for, and resourced communications surrounding any changes. Will targets be reviewed accordingly and if so how.**

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).

**Nothing further to add at present**

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 be included for recycling. Please state which items should be included and why	Unsure
<b>Glass</b>	Ceramics, for example crockery, earthenware Drinking glasses Flat glass Glass cookware including Pyrex® Light bulbs and tubes Microwave plates Mirrors Vases Window glass.	<b>Yes</b>		
<b>Metal</b>	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.	<b>Yes</b>		

<p><b>Plastic</b></p>	<p>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.</p> <p>Plastic pouches with laminated foil layer for 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>	<p>Yes</p>		
<p><b>Paper and card</b></p>	<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>	<p>Yes</p>		

<p><b>Any other items - please state which items and why they should be specifically excluded from recycling.</b></p>				
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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.

**CCGBC agrees with these proposals in theory. Successful application may depend on the type of population in a particular areas e.g. settled, property owners may behave differently from a transient HMO population. There may be different challenges with certain types of housing, requiring flexibility; it is therefore critically important for the Department to accept that public behaviour is an acceptable technical reason for decision making.**

***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

**CCGBC is concerned that DAERA seems to be moving away from the Defra position on this, and is seeking to place a more onerous requirement on councils in Northern Ireland, that will limit the ability to benchmark between regions. We would question whether DAERA should be using NI councils as some kind of 'test bed' to new policy, seemingly unaccompanied by the necessary resources to achieve the new standard. CCGBC objects to a different standard being applied to councils in NI as oppose to councils in other UK regions.**

**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.

**CCGBC are keen to ensure that they are collecting high quality recyclates but are not satisfied that an effective argument has been made that the ‘QUALITEE’ standard is necessary. What are the arguments that the current system is detrimental to quality.**

**In referencing our ‘unique legislation’ it should be noted that Regulation 18 of The Waste Regulations (Northern Ireland) 2011 does not cover collections of ‘fibres’ or card.**

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.

**For the same reasons previously stated. Funding, procurement, staffing**



**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.**

1. 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.

**CCGBC is not satisfied that an effective argument has been made that the 'QUALITEE' standard is necessary. This would be an additional requirement on councils in Northern Ireland that is not in place across the rest of the UK. We believe that this proposal is based on insufficient evidence using compositional analysis from two councils, and no councils that are already implementing restricted residual waste provision.**

**A similar consultation to this, recently conducted in England also failed to provide sufficient evidence that commingled collections are inadequate.**

**It is noted that the Department has had three years to gather evidence to inform this consultation, and has given councils and other stakeholders 12 weeks to provide evidence in a form it is willing to accept.**

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.

**CCGBC is not satisfied that an effective argument has been made that the 'QUALITEE' standard is necessary, or that any written assessment is necessary.**

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).**

**As per previous answers regarding the necessity of the 'QUALITEE' standard.**

***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.	X		
Salaries and staff numbers - including supervision.	X		
Container costs, numbers, and replacements.	X		
Vehicle types, costs, finance, depreciation, hire, running costs.	X		
Quantities of materials collected, frequency of collection.	X		
Associated overheads including depot costs.	X		
Contract length, penalties associated with variations.	X		
Other (please detail). <b>Health and Safety considerations, public consultation</b>			

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

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
Adverse environmental costs.	X		
Adverse health impacts.	X		
Potential for efficiency improvements.	X		
Revenues from sales of secondary raw materials.	X		
Application of the polluter pays principle.	X		
Application of Extended Producer Responsibility.	X		
Other (please detail). <b>Adverse safety impacts</b>			

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.

**The method for ascertaining economic costs for each collection system needs to be clear and agreed. There will be unknowns for the kerbside segregated system such as medium/long terms staff impact ie h&s implications**

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.

- **CCGBC is seriously concerned that the Department is not adequately taking ‘public preferences’ into consideration within the scope of what is technically feasible. Lack of public ‘buy – in’ will be a critical success factor in**

**Implementing the new system.**

- **Additional Storage space and local practicalities.**

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 classed as contamination and not recycled.	X		
Quantities of materials lost from sorting processes at a MRF.	X		
Vehicle emissions from collection rounds.	X		
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas.	X		
Emissions from disposal/ treatment including savings arising from landfill diversion; and	X		
Carbon savings from using recycled materials rather than virgin materials.	X		
Other factor to be added - please describe.			
<b>Compositional analysis of waste stream percentages from councils which already have implemented restricted residual waste capacity.</b>			
<b>Other factors to be collated from waste officers.</b>			

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
Comparable quantities (+/-2%) of each material stream sent for closed loop recycling.			X
Comparable quantities (+/- 5%) of each material stream sent for open loop recycling.			X
Other factor to be added - please describe.			
<b>Factors to be collated from waste officers.</b>			

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.

**There is insufficient information provided within the consultation document to enable an informed response to this question. More clarification is required as to what is actually meant by this question.**

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?

**Councils are not the regulating authority for MRFs.**

***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><b>Option A - “three stream”</b></p> <ul style="list-style-type: none"> <li>• Separate stream of glass bottles &amp; jars; with</li> <li>• Separate stream of paper &amp; card; with</li> <li>• Mixed stream of: metal packaging and plastics bottles, tubs, and trays</li> </ul>		
<p><b>Option B - “two stream: fibres out”</b></p> <ul style="list-style-type: none"> <li>• Separate stream of paper &amp; card; with</li> <li>• Mixed stream of: metal packaging, plastic bottles, tubs and trays and glass bottles &amp; jars</li> </ul>		
<p><b>Option C - “two stream: glass out”</b></p> <ul style="list-style-type: none"> <li>• Separate stream of glass bottles and jars; with</li> <li>• Mixed stream of: metal packaging, plastics bottles, pots &amp; trays, and paper &amp; card</li> </ul>		
<p><b>Option D - “fully co-mingled”</b></p> <ul style="list-style-type: none"> <li>• Mixed stream of: metal packaging plastics bottles, pots, tubs &amp; trays, paper, card, and glass bottles &amp; jars</li> </ul>	1	<p><b>What is the evidence supporting a change.</b></p>

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

1. 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.

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.

**More clarity is required on exemptions. If one exemption is possible, why not others?  
Greater communication with councils will be necessary on this issue.**

***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	Evidence required to justify weekly or separate food collection
Other - please detail.		

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.

**Properties do have food collection. Questions regarding weekly collection. Evidence required that weekly increases yield.**

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.

**CCGBC has concerns in relation to the contamination issues that could arise, and potential cost of monitoring and enforcement. Questions is regarding weekly collection. Evidence required for yield.**

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.				
More than 4 years from notification of statutory requirement.				
Never.				

Other - please detail.

**CCGBC would ask the Department to note the annual statutory local government budgetary cycle and consequent lead-in times for service delivery changes.**

**CCGBC would query the Department’s figures on separate food vis-a-vis combined food and green waste collections, noting that there has been no compositional analysis in councils who are already on a restricted residual system. The more limited residual waste provision is likely to have a considerable impact on other waste streams. There is concern in councils that a sizeable amount of evidence isn’t being captured.**

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.

**All Councils already provide caddy liners (made of suitable materials) to households free of charge. Guidance is already provided on council websites.**

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.	X
(2) Yes, as in (1) and via citizens adding their own note to their food waste containers to request new liners which crews deliver.	X
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.	X
Other method - please detail.	
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.

**CCGBC already provide caddy liners (made of suitable materials) to households free of charge. Reliance on householders to purchase their own liners is inequitable and likely to lead to contamination.**

***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.***

1. 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.

**CCGBC has concern in relation to the costs associated with enforcement and the likelihood that a system reliant on fixed penalty notices will not cover these costs. Concerns also regarding details of enforcement and criteria for penalties.**

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.	X		
Crew training on how to manage containers with the wrong items.			
Oversight of crew working practices.			
Better support to crews and recognition of their work.			
Clear and updated visually appealing websites.	X		
<p>Other - please detail.</p> <p><b>Crew training, working practices and support are operational issues for councils and are not a policy concern for the Department.</b></p> <p><b>The appearance, content and updating of a council website is the responsibility of the council concerned.</b></p> <p><b>CCGBC has no objection to the provision by DAERA of communications materials and resource to enable councils to improve communications with citizens.</b></p>			

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.				

**CCGBC has concern in relation to the costs associated with enforcement and the likelihood that a system reliant on fixed penalty notices will not cover these costs. Fixed penalties and fines are believed to be particularly pointless in areas of social deprivation.**

**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.

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.		<b>Hazardous Waste is a DAERA responsibility</b>	
Collection of textiles, batteries, WEEE from the kerbside and communal properties.		<b>Provision is a decision for each individual council.</b>	
Collection of cooking and engine oil from the kerbside.		<b>Cooking and Engine Oil are DAERA responsibilities.</b>	
Collection of AHPs (nappies, incontinence products) from the kerbside.		<b>Provision is a decision for each individual council.</b>	
Standardised arrangements for assisted collections from the kerbside.		<b>Provision is a decision for each individual council.</b>	
Standardised price ranges and arrangements for bulky waste collections.		<b>Charging policy for bulky waste collections is a decision for each council.</b>	
Standardised arrangements for replacement containers.		<b>Provision is a decision for each individual council.</b>	
Standardised arrangements for excess recycling.		<b>Don't understand this</b>	
<p>Other - please detail.</p> <p><b>The Department does not appear to recognize that there are existing methods available.</b></p> <p><b>Councils have decades of experience in waste collection and have developed and shared good practice on many of these issues, for many years.</b></p> <p><b>It is critically important to the Department to consider that the ratepayer is the ultimate decisionmaker.</b></p>			

## 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.

**CCGBC has no strong view on this issue.**

**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 not 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.	X		

	Agree. All items listed in the row should be included.	Disagree. All items listed in the row should not be included for recycling. Please state which ones should be excluded and why.	Unsure
Glass bottles and jars - including drinks bottles, condiment bottles, jars etc and their metal lids.	X		
Metals: 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 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 included for recycling. Please state which items should be included and why.	Unsure
<b>Glass</b>	Ceramics, e.g., Crockery or earthenware Drinking glasses Flat glass Glass cookware including Pyrex Light bulbs and tubes Microwave plates Mirrors Vases	X		



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 included for recycling. Please state which items should be included and why.	Unsure
<b>Metal</b>	<p>Laminated foil i.e., pet food pouches, coffee pouches.</p> <p>General kitchenware i.e., cutlery, pots, and pans.</p> <p>Any other metal items, i.e., kettles, irons, pipes, white goods.</p>	<b>X</b>		
<b>Plastic</b>	<p>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.</p> <p>Plastic pouches with laminated foil layer i.e., pet food pouches, coffee pouches.</p> <p>Plastic bottles containing white spirits, paints, engine oils and antifreeze.</p> <p>Bulky rigid plastics such as garden furniture, bins, and plastic toys.</p> <p>Polystyrene (expanded and high impact) Polyvinyl chloride (PVC) packaging.</p>	<b>X</b>		

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 included for recycling. Please state which items should be included and why.	Unsure
<b>Paper and card</b>	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 .	<b>X</b>		

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.

**It is noted that as per household waste, councils have a statutory duty to collect waste when no one else will.**

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.

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).

**CCGBC has no strong view on this issue. More appropriate for businesses to decide.**

***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.

**CCGBC has no strong view on this issue.**

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.

MRF infrastructure and/or capacity.

Inability to resource and mobilise within the timeframe.

Cost Burden to obligated businesses, and NHM producing premises.

Reprocessing availability.

End Market volatility/lack of end markets.

**CCGBC has no strong view on this issue.**

***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

**This ultimately is up to business. However Councils should not be in a position to collect waste if there is a market failure.**

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.

**Public bodies should be included, regardless of size. Many of these organisations will use regional contracts.**

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.

**Public bodies should be included, regardless of size. Many of these organisations will use regional contracts.**

**To a large extent, this activity will be determined by commercial considerations, and by what the private sector finds sustainable to deliver. CCGBC has concerns that councils will be required to step in where there is market failure, and left with the responsibility to collect the more costly, lower end products. It is likely that this will be a particular issue in rural areas.**

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.

**More clarity is required on who will be expected to enforce recycling practices in smaller businesses. If this is to fall to councils, councils will need to consider carefully how to address this potential new function. CCGBC would be keen to see the Department applying New Burdens policy in this eventuality, to ensure councils are adequately resourced to deliver what would be a newly required service. CCGBC is not supportive of a 'transfer by stealth' of additional enforcement responsibilities unaccompanied by appropriate resources.**

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.

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.

**Ideally, food waste should be treated by anaerobic digestion, producing energy, however CCGBC successfully commingle food and garden waste which is treated through in vessel composting.**

**The treatment technology used should be a decision for the council, in line with their citizens' preferred option and budgetary considerations.**

**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 disproportionate 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.	X		
Separate Paper and card	Including newspaper, cardboard packaging, writing paper, etc.	X		
Separate Plastics and metals	Including drinks containers, detergent, shampoo and cleaning products, pots, tubs & trays, etc.  Steel and aluminium tins and cans, including aerosols  Drinks cartons (i.e., Tetrapak)	X		



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

**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.

**CCGBC is of the view that rurality is a key consideration in relation to the deliverability of this proposal.**

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;			
Quantities of materials classed as contamination and not recycled;			
Quantities of materials lost from sorting processes at a MRF;			
Vehicle emissions from collection rounds;			
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas;			

	Yes - agree	No disagree - please provide information as to why you disagree, providing clear evidence.	Unsure
Emissions from disposal/ treatment including savings arising from landfill diversion; and			
Carbon savings from using recycled materials rather than virgin materials.			
Other factors to be added - please describe.			
<p><b>CCGBC is of the view that this question would be best answered by the private sector. It is noted, however, that there is a risk of service delivery falling to council, and a potential expectation that councils should extend the current domestic service, particularly in rural areas. The difficulties resulting from mixing domestic and commercial waste must be considered.</b></p> <p><b>The lack of information on the digital waste tracking system is a concern.</b></p> <p><b>How do we see the point of collection, to enable a business to report?</b></p> <p><b>Who is going to assess this, or determine compliance?</b></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
Comparable quantities (+/-2%) of each material stream sent for closed loop recycling.			X
Comparable quantities (+/- 5%) of each material stream sent for open loop recycling.			X
Other factors to be added - please describe.			

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.

**There is a risk that in more rural areas, responsibility might fall on councils for collection, with an expectation that the domestic service might be extended. Aside from the additional cost of collection and treatment, it is noted that ‘mixed loads’ present difficulties for councils, including contamination issues and Operators Licence issues.**

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:

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. <b>CCGBC is of the view that this question would be best answered by the private sector.</b>	

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.

**CCGBC is of the view that this question would be best answered by the private sector. The lack of information on the digital waste tracking system is a concern.**

**There is potential for one QualiTEE system for households and another for businesses. It is unclear as to what happens in this eventuality.**

**How do we see 'point of collection' for businesses to report?**

**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.

**CCGBC is of the view that this question would be best answered by the private sector. However, we are curious as to who is going to examine these assessments and determine their accuracy.**

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.

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.

**There is potential for one QualiTEE system for households and another for businesses. It is unclear as to what happens in this eventuality.**

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).

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?

**CCGBC is of the view that this question would be best answered by the private sector.**

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).

**CCGBC is of the view that this question would be best answered by the private sector.**

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

**No**

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).

**CCGBC is of the view that this question would be best answered by the private sector.**

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.

**CCGBC is of the view that this question would be best answered by the private sector.**

**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

**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				
Contractual				
Space	X			
Engagement				
Location	X			
Time and expense of staff training.				



	Major Barrier	Some Barrier	Little/No Barrier	No opinion
Enforcement				
Lack of awareness or understanding of how to recycle more waste.				
Other <b>CCGBC is of the view that this question would be best answered by the private sector, public bodies and other organisations.</b>				

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

**Potential for communal business facilities/arrangements in urban areas might be a possibility (e.g. through Chambers of Commerce, BIDs, traders associations) but may pose contamination issues.**

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.					
National, regional, or local communications campaigns.					
National guidance and good practice case studies.					
Dedicated website including online business support tools (e.g., online calculator and good practice guidance).					
Other (please specify). <b>CCGBC is of the view that this question would be best answered by the private sector, public bodies and other organisations.</b>					

3. 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.	
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.	
Guidance and/or notification provided to obligated businesses and organisations via their existing waste or recycling collector.	
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.	
Other (please specify). <b>CCGBC is of the view that this question would be best answered by the private sector, public bodies and other organisations.</b>	

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.	
Develop new procurement framework opportunities for waste management services that businesses and NHM producers can use collaboratively to gain best value.	
Develop standard contract templates that businesses and NHM producers can utilise to collaboratively source waste management services.	
Collaborate with key industry organisations or accredited associations to develop waste management framework opportunities suitable to specific industry sectors i.e., transport, retail, hospitality.	
Other (please detail and provide examples if possible). <b>CCGBC is of the view that this question would be best answered by the private sector, public bodies and other organisations.</b>	

**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.
- 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 accommodate the changes.	Not sure
24 months from notification of a statutory requirement.	<input checked="" type="checkbox"/>			
3 to 4 years from notification of a statutory requirement.				
More than 4 years from notification of statutory requirement.				
Never.				
Other - please detail.				

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.

**CCGBC is of the view that this question would be best answered by the private sector, public bodies and other organisations.**

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.	X
MRF infrastructure and/or capacity.	X
Container procurement and distribution challenges.	X
Reprocessing availability.	X
End market volatility/lack of end markets.	X
Cost burdens to collectors of setting up new or expanded collection services.	X
Other - please describe. <b>Planning process limitations</b> <b>Public protest</b> <b>Commercial viability</b>  <b>NB: CCGBC is concerned that market failure may increase the expectation on councils to deliver</b>	

**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.

	Agree	Disagree	Not sure/No opinion/Not applicable.	No opinion
Dry recyclable material streams (glass, metal, plastic, paper, and card).			X	
Food Waste.			X	
Other Items, for example oils, hazardous waste, bulky waste (please specify).			X	

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)

**Ultimately some of this is a decision for businesses but more information is required.**

**It is also noted that 'co-collection' is a description of council activity.**

**Could Councils be left with poor quality material or recyclates?**

**More clarity and discussion is required in relation to this question. There is a potential solution in that legislative change could remove the obligation on councils to collect.**

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 (please detail).	<p><b>More clarity and discussion is required in relation to this question, which could be informed by the views of the private sector in response to this question. As noted above, there is a worrying potential for councils to be disadvantaged and left with lower quality materials if in direct competition with private sector collectors. There is a potential solution in that legislative change could remove the obligation on councils to collect.</b></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.

**CCGBC does not have a strong view on this.**

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

**Not at present. More details required.**

***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.

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).

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?

**NO**



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

**Difficulties in categorization and identification**  
**Legislative loophole in relation to household large waste**  
**Weighbridges required – not all sites/councils have these**  
**A change of primary legislation would be necessary.**  
**Space at HRCs.**

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).

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).

**All of the above would require detailed discussion with councils, in a more substantive engagement than has been afforded during this consultation period.**

**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.

**Success will depend on good communication of the changed requirements, provision of support for businesses and the willingness/capacity of businesses to change. Also, on the level of education, monitoring and enforcement provided. It is unclear whether sufficient resources will be made available for this.**

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.

**CCGBC is of the view that this question would be best answered by the private sector, public bodies and other organisations. It is noted however, that a fixed penalty system is unlikely to cover the costs of enforcement.**

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