

FINAL NILGA Response to DAERA Discussion Paper on the Future of Recycling

Process

The following response was drafted further to a series of workshops hosted by the Waste and Resources Action Programme including a 'strategic overview' discussion for elected members and council directors requested by NILGA. The discussions at these workshops were used to inform the response below, in addition to existing NILGA policy on issues such as Extended Producer Responsibility for Packaging Waste.

This initial draft was discussed at the NILGA Executive Committee meeting on 11th September, further to which additional NILGA member and council comment was included to develop this finalised regional local government response for the consultation closing date of 4th October.

The finalised NILGA response will be presented for ratification by the NILGA Executive Committee on 9th October 2020.

Derek McCallan
Chief Executive

2nd October 2020

1.0 INTRODUCTION

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of the 11 Northern Ireland district councils and is supported by all the main political parties. Resource management (including recycling) is a key issue for local government due to the huge impact it has on our local economy and environment, and council financial considerations.

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2.0 OVERVIEW

Resource (waste) management, recycling and reprocessing hold great potential for durable job creation, which, through the contemporising of systems, processes and infrastructure, should

have a positive environmental impact. NILGA is pleased to be able to have an opportunity to comment on the proposals in relation to the "Future Recycling and Separate Collection of Waste of a Household Nature in Northern Ireland" discussion paper, and we trust that our views will be taken into account as part of the policy development process.

This is an unprecedentedly difficult time for councils, and the economy in general; many of the comments made in the responses below will reflect this and the need for a green recovery post-COVID. The impact of the pandemic on the economy has been of a speed and scale hitherto unknown, so it is difficult to predict how the proposals under discussion and the development of new policy and practices will play out over time – particularly as they affect the small business led economy of Northern Ireland.

NILGA welcomes the commitment from DAERA to refresh the approach to recycling in Northern Ireland, based on our commitment to the EU Circular Economy Package. We believe that this is a vitally important part of ensuring that Northern Ireland is playing its part in delivery of the UN's Sustainable Development Goals (SDGs) and proactively addressing the increasingly urgent climate crisis. This has been given additional traction locally following the recent Climate Emergency declaration made by the Northern Ireland Assembly and commitments in the 'New DNA' document. It is noted that the World Economic Forum (WEF) last year recognised that the climate crisis could not be mitigated without putting a Circular Economy (CE) at the heart of our economies, and it's from this perspective that NILGA would submit the following commentary, following the flow of the document:

3.0 COMMENTARY ON PROPOSALS UNDER DISCUSSION

Consultation Questions

Proposal 1: In order to increase food waste collected from the non-household municipal sector, the Food Waste Regulations (Northern Ireland) 2015 should be reviewed to ensure obligated businesses segregate food waste for collection

Q1. Do you agree or disagree that that the Food Waste Regulations (Northern Ireland) 2015 should be reviewed regarding food waste collections from food businesses?

Partially Agree: If the targets set out in the Circular Economy package are to be achieved, better recycling from businesses will be essential. Diversion of food waste from landfill is a necessity, from a resource management perspective and also to ensure carbon emissions are reduced. A review of current legislative arrangements may be helpful in this regard, providing

there are no unintended consequences of change (e.g. greater numbers of collection vehicles resulting in increased carbon emissions). A number of questions will undoubtedly be raised in relation to monitoring and enforcement of more stringent legislation, who enforces, how increased enforcement would be paid for etc., so a thorough impact assessment of proposed changes would be essential.

It is also the case that many non-food businesses will produce large quantities of food waste and may need to be considered in any future review.

NILGA is particularly concerned that the impact of change will fall disproportionately on small business and would be keen to explore mitigations for this eventuality, particularly in light of the ongoing financial challenges presented by COVID-19.

Q2. If the Food Waste Regulations were to be reviewed which of the following areas should be investigated:

	Strongly Agree	Agree	Disagree	Strongly Disagree	Not sure/ Don't know
Awareness of the Regulations to obligated businesses	X				
Requirements to separate food from all business types		X			
Options to amending the regulations for more business types to be in scope of the requirements		X			
Access to food recycling services for businesses	X				
Charging levels for food waste collection services	X				
Monitoring of business compliance	X				
Enforcement of business compliance	X				
Data and reporting of		X			

food recycling					
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Which other areas of the Regulations, if any, do you think should be investigated?

Major concerns in relation to increasing recycling levels will be the availability of space and provision of suitable containers for storage, and potential for public health complaints about businesses. Communications campaigns will also need to consider any language barriers, and how to address these.

Businesses will vary in their understanding of and abilities regarding data collection and reporting, and the mechanisms for this will need to be co-designed with the private sector and any future monitoring body.

NILGA has no further comment to make in relation to Proposal 1.

Proposal 2: We want to increase recycling from businesses and other organisations that produce municipal waste. We think the most effective way of doing this would be to require these establishments to segregate their recyclable waste from residual waste so that it can be collected and recycled by waste collectors.

Q3. Do you agree or disagree that all businesses, public bodies and other organisations that produce municipal waste should be required to separate dry recyclable material from residual waste so that it can be collected and recycled?

Agree: with caveats in relation to potential for increased numbers of collection vehicles, and concerns about storage space. Rurality must be considered, as multiple collections over a dispersed area will be very costly. Increased cost and complexity of collection systems may exacerbate fly tipping issues in rural and urban areas.

Q4. Which of the two options do you favour?

Option 1: mixed dry recycling and separate food recycling; no glass recycling	
Option 2: mixed dry recycling, separate food recycling and separate glass recycling	
Something else (please explain below)	
Not sure/no opinion	X

Please explain your selection:

The views of the hospitality sector in particular, will be important in making changes to this area of policy. The need for glass recycling will vary between different kinds of businesses. The potential for public health nuisance must be mitigated.

Q5. We would expect businesses to be able to segregate waste for recycling in all circumstances but would be interested in views on a preferred position for instances where this may not be practicable for technical, environmental or economic reasons

Not sure/no opinion/not applicable: It would be preferable that all businesses were able to segregate waste for recycling in all circumstances but it is clear that for smaller businesses, the issues already outlined in relation to storage space, will pose difficulty. A cross-departmental approach (between Economy, Infrastructure and DAERA in particular) would be helpful in taking this forward.

Q6. Should some businesses, public sector premises or other organisations be exempt from the requirement?

Not sure/no opinion

Q7. Do you have any other comments to make about Proposal 2? For example, do you think that there are alternatives to legislative measures that would be effective in increasing business recycling?

NILGA would encourage the department to work with the business sector and collectors to develop practical solutions, perhaps through the encouragement of collaborative storage provision, and/or WRCs for the small business sector. Discussions with council planning departments will be necessary, and amendments may be necessary to Building Control Regulations to ensure new build businesses have adequate storage space.

Discussions with Business Improvement Districts may assist in developing solutions in urban areas where businesses are already working collaboratively.

Proposal 3: As rural communities make up a significant proportion of Northern Ireland, we propose to review the impact on businesses in rural communities so that they are not disproportionately affected by laws introduced to increase recycling of non-household municipal waste.

Q8. Considering rural needs, what factors should be included in the review of the proposals on non-household municipal waste:

	Yes	No	Not sure/Don't know
Cost of recycling services proposed compared to collections in urban areas	X		
Ability to reconfigure services to alleviate cost burden in rural addresses	X		
Access to recycling services in rural areas	X		
Issues with communicating to rural businesses			X

Q9. Please list any other specific factors that should be included in the assessment of the policy proposals that may have a different impact on businesses in rural settlements.

Appropriate consideration must also be given to rural needs as part of the development of policy proposals for household waste in rural areas.

Proposal 4: We propose to review options to maximise business recycling whilst alleviating cost burden on businesses

Q10. We would welcome views on these options and also evidence of other measures that may be available to support business recycling and to reduce costs for businesses.

Likelihood of increasing recycling without a cost burden to businesses	Very Likely	Likely	Unlikely	Very Unlikely	Not sure/Don't know
Improving access to drop off sites and HWRCs for business use. *		X			
More focus on problem materials such as office furniture, tyres, batteries, printer cartridges, fluorescent lights, fats and oils.					X
Providing business advice on optimising/ rationalising current services.		X			
Sharing of containers with neighbouring businesses.		X			
Regional procurement of services to		X			

enable economies of scale and reduce charges levied on businesses.					
One to one support and advice for businesses.	X				
Clearer information on what materials can be recycled and how.	X				
On-line tools and calculators to provide information on reducing costs.	X				
Better data to help businesses measure performance and benchmark.					X
Standardisation in pricing approaches from private contractors.					X
Combining door to door household and business collections. **		X			
Better access and availability of kerbside services.		X			
Rewards for businesses that recycle such as incentives, ratings and reduced costs.		X			
Government or Industry subsidised cheaper costs of collection services.	X				
Reviewing cross boundary working options (both local authority and national level). ***					X
Clarity in where and how waste and recyclables are treated.					X

Other: N/A

Q11. What are your general views on the options proposed to reduced costs?

*NILGA would highlight that many council owned HWRCs are not accessible to businesses, and there is a view in local government that to open up this opportunity would result in existing HWRCs being overloaded on a daily basis. A strategic conversation is required with councils and the waste collection industry to seek appropriate ways to deal with business recycling, including potential for private sector provision of business WRCs, and regulation of same. Infrastructure funding is likely to be required.

**Combination of door to door household and business waste collections would require detailed consideration, given the potential changes in council role and financial arrangements. Any move to a 'franchise' type model will require the development and maintenance of a great deal of confidence in the waste industry, however the carbon reduction benefits associated with reducing the number (and type) of collection vehicles on the road, cannot be ignored.

***Given the involvement of the private sector in business waste collection in Northern Ireland, and the lack of detail behind the business view that cross-boundary working could increase recycling without increasing costs, it is likely that a strategic conversation will be necessary to tease out exactly what is meant here, and what would be required from councils.

Q12. What might be other viable options to reduce the cost burden that we have not considered?

NILGA has no comment to make on this issue at present.

Q.13. Do you have any other views on how we can support businesses and other organisations to make the transition to improved recycling arrangements? [No](#).

Proposal 5: In advance of implementing changes to business recycling, we will work with waste producers and waste collectors to improve reporting and data capture on waste and recycling performance of businesses and other organisations. Any requirements will be subject to further consultation.

Q14. Should businesses and other organisations be required to report data on their waste recycling performance?

Yes: Although the means for/method of obtaining data will need to be developed in partnership with the business sector, it is vital that data is collected to ensure NI can have confidence in its performance on the circular economy targets. The information can also be used to benefit the business sector, through use as an evidence base to access support from government to improve.

Q15. Who should bear the responsibility for reporting data on waste from businesses and other organisations (please select all that apply)?

Producers (businesses and other organisations where waste is produced)

Collectors (the organisations responsible for the collection of waste from businesses and other organisations)

Re-processors/treatment facilities (the organisations responsible for processing and treatment of waste)

Not sure/no opinion/not applicable: If the cost and administrative burden on businesses is to be minimised then it is likely that support from the industry will be needed on this – for small businesses in particular.

Q16. What specific data sets would your organisation find useful if businesses were required to report under Proposal 5?

NILGA has no comment to make on Q16, other than to highlight that from time to time councils run projects supporting businesses in improving their environmental management to cut costs. Information on recycling figures would be beneficial in this kind of activity.

Proposal 6: We propose that all Councils in Northern Ireland should be required to restrict capacity for residual waste from households to help divert more materials into the recycling waste streams.

Q17. Do you agree or disagree with the proposal that Councils should be required to restrict residual waste capacity (either by frequency or by residual container volume)?

NILGA supports the principle that residual waste capacity should be restricted, and notes that all councils in Northern Ireland have moved to a fortnightly collection of residual waste since 2006. We accept that it would be helpful for diversion of more materials into the recycling streams to reduce residual capacity further, but we are deeply conscious of the cost implications of system change.

NILGA notes the results of the research conducted locally, in areas where new systems have been introduced and the demonstrable impact of restricting residual waste, over and above the introduction of new recycling systems, but would emphasise that in the short to medium term, changes attracting least cost would be more highly favoured by councils. As has previously been stated, this is an extremely precarious time financially for councils, and the introduction of new containers council-wide, or enhanced systems, is exceptionally unlikely in most council areas without government support. Waste is one of the biggest expenditures for councils and if there will be increased costs across the board this is something councils will need to consider very closely.

Additionally, and no less an issue, the challenge associated with changing public behaviour is sizeable, and councils also must consider the needs of the different populations they must serve – ageing, transient, rural, high rise etc. Civic conversation is likely to be needed across

Northern Ireland and in each council area to ensure the public understand any change, why it is happening and what the benefits are.

Our members have serious concerns in relation to the risk of increased flytipping if restrictions are brought in for household waste.

NILGA members have also highlighted the importance of awareness and planning in relation to procurement and contract management across the 11 councils, noting that it is vital that councils know what is happening with and monitor waste contracts going forward. They do not want to be tied into something that will not be fit for purpose.

Q18. Assuming there will be necessary exemptions for key property types, do you have any preference with the proposals below that Councils should be required to restrict the residual waste in different ways?

(Note that Q17 looks at possible enhancements that could be made to possible restrictions of residual waste)

Agree – Councils should be required to restrict residual waste bin volume while retaining existing collection frequency

Agree – Councils should be required to restrict residual waste by reducing the collection frequency while retaining the same size container

Agree – Councils should be required to restrict residual waste bin volume and reduce frequency

Not sure/don't have an opinion

A strategic conversation and agreement would be needed across the 11 'sovereign' councils as to what the preferred option would be, to assist in informing and co-designing policy and any future legislation. The 11 councils are working closely together on waste management issues, but it is likely that on this, there will be significant debate politically, and to establish what would be acceptable to the public. Bin collection is a very visible aspect of council service and can be the focus of much public attention when systems change, but the current financial situation may present an opportunity to consider new arrangements.

Q19. If residual restriction was to be implemented, which enhancements should be made to the recycling service to help increase performance and ensure consumers are satisfied with the overall services offered?

Potential Enhancement	Yes	No
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Increased frequency of the dry recyclables collection		
Increased frequency of the food recycling collection		
Larger container capacity for the dry recyclables collection		
A higher frequency sanitary waste collection		
A collection of nappies for young families		
Other (please specify)		
Not sure/don't have an opinion - X		

There are advantages and disadvantages to most of the suggestions above.

Increased collection frequencies bring with them increased and ongoing costs, as well as increased carbon emissions (unless a hugely expensive fleet replacement takes place).

Larger container capacity may cause storage issues for some – particularly in urban areas but given the results of the research on residual restriction, it would seem that a larger container would provide encouragement to use.

Restriction in residual capacity would further increase public calls for nappy collection, but if the residual bin is not to be used for this, would another container be necessary, taking up more space? Public health considerations of storage would need to be considered for nappy and sanitary waste. and any increased risk of flytipping needs to be countered where possible.

Again, a sectoral conversation within local government would assist in identifying preferred/ possible options. More clarity from government on the sequencing of system change and private sector support arising from the forthcoming EPR legislation would be extremely helpful.

Proposal 7: By 2023 we propose to legislate for Councils to provide all kerbside properties and flats with access to at least a weekly collection service for food waste.

The following question is designed to consider preferences for the proposal and consultees are encouraged to select more than one option where they may be interested in multiple aspects of the proposal.

Q20. Which aspects of the proposal do you agree and disagree with?

	Agree	Disagree	Not sure/don't have an opinion/not applicable
(i)at least a weekly collection of food waste			X – councils best suited to collectively

			consider and determine
(ii) a separate collection of food waste (i.e. not mixed with garden waste)			X – councils best suited to collectively consider and determine
(iii) a weekly mixed food and garden waste collection			X – councils best suited to collectively consider and determine
(iv) services to be changed only as and when contracts allow	X		
(v) providing free caddy liners to householders for food waste collections	X		

SEE ALSO APPENDIX A – COVID ADDITIONAL COST RECOVERY PAPER

It is noted that 81% of households are currently on a (usually) fortnightly mixed food and green waste collection. To move to a weekly food waste collection will increase costs for councils on an ongoing basis, which they would most likely need to pass on to the ratepayer.

At present local government operates on a budget of £800m per year, £600m of which comes directly from rates. The economic downturn caused by COVID, and the impact on council income generation caused by the lockdown, has placed councils in a particularly difficult position, and we are heading into a period of double-digit rates increases and staff redundancies.

NILGA is currently working with SOLACE, DfC and DoF to explore how to develop a more sustainable funding system for councils but we anticipate that there will be a need for substantial government intervention to keep many of our councils operational over at least the next three years. It may be the case that in a number of councils, delivery of existing bin collection and other waste services will be affected, so the prospect of setting up new additional services is low.

The 2023 timetable is extremely ambitious, and if legislation is put in place, we would encourage flexibility in terms of commencement. Although a reasonably long lead-in time would be needed to introduce a new system in any case, it is likely that a longer than

anticipated lead-in time will be needed given the current pandemic context. It would also be helpful to introduce change as contracts allow, to ensure no penalties are incurred.

Proposal 8: We propose that all Councils in Northern Ireland should be required to collect a core set of dry recyclable materials at kerbside from houses and flats.

This core set of dry materials should include at least the following:

- glass bottles and containers – including drinks bottles, condiment bottles, jars etc.
- paper and card – including newspaper, cardboard packaging, writing paper etc.
- plastic bottles – including drinks containers, detergent, shampoo and cleaning products etc.
- plastic pots tubs and trays

Q21. Setting aside the details of how it would be achieved, do you agree or disagree with the proposal that Councils should be required to collect a set of core materials for recycling?

Agree: Councils should be required, to collect a core set of materials, provided they are fully financially supported to do so.

The 11 councils in Northern Ireland are already collecting this core set of materials for some of their households, with collection methods varying according to local practicalities

Q22. We think it should be possible for all Councils to collect the core set of materials. Do you agree with this?

Agree: This will be possible provided enough resources are provided on an ongoing basis to achieve the desired outcome. NILGA would propose caveats in relation to collection in rural areas, areas with a highly transient population, an ageing population or hard to access areas. Creative solutions will need to be found to providing a suitable service in these situations within acceptable cost limits. It is highly unlikely that producers will provide financial support for collections that they don't view as 'cost efficient'.

Q23. What special considerations or challenges might Councils face in implementing this requirement for existing flats and Houses in Multiple Occupancy (HMOs)?

For existing buildings there may be issues with sufficient storage space, with enforcement of individual behaviours, and with fly tipping (e.g. as is currently experienced in the Holylands). For

privately owned apartment blocks, it might be useful to look at legislative responsibility for management committees, and for HMOS, responsibilities on the landlord as well as tenants.

NILGA would particularly encourage DAERA to develop an awareness of the requirements of the following:

- Houses in Multiple Occupation (NI) Act 2016
- Houses in Multiple Occupation (Living Accommodation Standards) Regulations (NI) 2019
- The Local Government Waste Storage Guide (which NILGA has recently requested that TAG(NI) review and contemporise, with Building Control NI and other relevant groups).

Cross-departmental (with DfC) and central-local working (particularly with Belfast CC) is likely to be helpful to develop this area of policy.

As has been identified in the WRAP workshops, collection of a core set of materials across the 11 councils, will assist in communication of requirements e.g. in student populations. Additionally, in some areas, there may be significant language and cultural barriers in explaining requirements to tenants, necessitating intensive communications work.

Q24. Do you have any other comments to make about Proposal 8? Please use this space to briefly explain your responses to questions above, e.g. why you agree/disagree with proposals.

There are particular issues for councils with dispersed rural populations over a large geographic area, and an effective cost-benefit analysis will be necessary to ensure councils are not left with huge costs. In addition to the costs associated with additional collection routes, it is noted that in rural areas, containers may need to be left in exposed areas, requiring more durable containers and resulting in more frequent replacement costs.

If the changes arising from the revised EPR legislation result in processors having more control over the collection system, there is a high possibility of council reprioritisation, leaving more difficult to access properties out of the separate collection system with increased amounts of material going towards RDF.

NILGA would assert that all costs associated with such changes are met so that councils can undertake the added responsibilities under the principle of New Burdens Legislation (applicable across rest of UK).

Proposal 9: We propose that the core set of materials will be glass bottles and containers, paper and card, plastic bottles, plastic pots tubs and trays, and steel and aluminium tins and cans.

Q25. Do you believe that all of these core materials should be included or any excluded?

Material	This should be included in the core set but phased in over time	This should be excluded from the core set	Not sure/don't have an opinion/not applicable
Glass bottles and containers	X		
Paper and card	X		
Plastic bottles	X		
Plastic pots tubs and trays	X		
Steel and aluminium tins and cans	X		

It is noted that the table above is different from the table for Q26, and that consideration will most likely need to be given to materials being included from the start rather than being phased in over time.

If targets continue to be solely weight based, then the costs of collection and processing of lightweight materials may outweigh the benefits.

Glass Collection

To collect glass, co-mingled or not, will require investment and a robust cost-benefit analysis will be necessary if kerbside glass collections are to increase. Any increased cost to contractors would have a knock-on effect for councils. NILGA would be keen to see DAERA identify where the resource would come from to facilitate a system change of this nature.

Q26. What other products or materials do you believe should be included in the core set that all Councils will be required to collect?

Material	This should be	This should be	This should be	Not sure/don't
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	included in the core set from the start	included in the core set but phased in over time	excluded from the core set	have an opinion/not applicable
Plastic bags and film				X
Black plastic food and drink packaging				X
Other materials (please specify)				X

If targets continue to be solely weight based, then the costs of collection and processing of lightweight materials may outweigh the benefits. Much of the lightweight materials - bags and film - currently end up in RDF. The suitability of the MRFs used for processing must be established to assess when/if inclusion of the above materials is appropriate, with regular reviews.

Q27. If you think these or other items should be considered for inclusion at a later stage, what changes would be needed to support their inclusion?

Much of the policy that will govern what happens in relation to this question will be developed in Whitehall, but if change is to occur, consideration will need to be given to labelling of packaging, ensuring lightweight packaging is recyclable, the suitability of our MRFs for processing lightweight and coloured materials, the role of producers in factoring these issues into cost/bottom line figures, calculation methodologies, and how TEEP (Technically, Environmentally and Economically Practicable) might apply in NI.

The role of retailers is also a critical one, in relation to procurement specifications from food suppliers, and in the provision of recycling facilities on-site at supermarkets (e.g. plastic bag recycling facilities).

Q28. Do you have any other comments to make about Proposal 9?

Prior to implementation of any new systems in Northern Ireland, a strategic conversation across the 11 councils would be advisable to future-proof decisions and to ensure no expensive

short-term choices are made. Appropriate lead-in times will be necessary for the introduction and the commencement of any new legislation, which will need to be accompanied by appropriate resourcing for councils, in keeping with the New Burdens approach in England, Scotland and Wales.

Proposal 10: We propose that this core set of materials should be regularly reviewed by government and, if appropriate, expanded over time provided that:

- a) evidence supports the benefits**
- b) there are viable processing technologies for proposed materials**
- c) there are sustainable end markets**
- d) Councils would not be adversely affected, including financially.**

Q29. Do you agree that the core set should be regularly reviewed and, provided certain conditions are met, expanded?

Yes, considering the issues raised in our responses to Q22 and q24

No

Not sure/don't have an opinion

Q30. Do you believe that the proposed conditions a) b) c) and d) above are needed in order to add a core material?

Yes, and d) in particular – but I would also add some.

- That the change can be communicated in simple terms to the public and is easily understood.
- That preparatory or simultaneous efforts are made to develop appropriate processing technologies locally.

Q31. Do you have any other comments to make about Proposal 10?

Not at this time

Proposal 11: We propose to review the separate collection of materials in Northern Ireland and supporting guidance to help clarify the position on current and future collections to help Councils and waste operators in decision making on separate collection.

Q32. Do you agree that a review of separate collection requirements is required for Northern Ireland to inform municipal collections in light of proposals for core sets of recyclable materials and new producer obligations under Extended Producer Responsibility (EPR)?

Yes

No

Not sure/no opinion/not applicable

If you selected No, please provide examples below.

A review would be useful, now that the 11 councils are working more closely together on waste management planning, and since it is acknowledged that greater consistency of items collected and collection systems across Northern Ireland would help build public confidence and understanding of what is required and why.

There is significant debate within the local government sector regarding systems in use and potential system change, and it will be vital to ensure that the councils have confidence that any such review is fully independent and free from the influence (perceived or real) of interested parties.

Councils are keen to improve the quality of their recycle and to work with their householders to achieve this, but a move e.g. to separate collection rather than co-mingled, carries with its heavy cost implications and so cannot be made lightly.

It would also be greatly helpful to garner more information on the sequencing of EPR requirements, the setting of conditions by producers and the provision of funding from producers, prior to any such review.

More clarity will also be essential on the proposals for any Deposit Return Scheme as this would potentially have a massive impact on council finance calculations.

Q33. What circumstances may prevent separate collection of paper, card, glass, metals and plastics? Please be as specific as possible and provide supporting evidence for your statements.

- Cost of system change
- Public preference for co-mingled collection (easily understood/more convenient)
- Rural issues (see response to Q24)
- Current lack of understanding/analysis of contamination within system

Proposal 12: Based on the preceding summary of the key issues, we therefore propose to provide national guidance for Northern Ireland to help establish greater consistency in recycling and waste collection services and reduce confusion for households.

Q34. What would be your preferred approach to Government encouraging greater national consistency in collection services?

Proposal	Agree	Disagree	Not sure/don't have an opinion/not applicable
Publish Statutory recycling service guidance to detail service requirements?			X
Publish Statutory minimum service standards guidance?			X
Publish non-statutory guidance?			X

Q35. Do you have any further comments to make about the Proposal outlined above?

This proposal will be materially affected by the outcomes of the forthcoming EPR policy and legislation. As NILGA highlighted in our response to the Defra/DAERA PPRS consultation (May 2019) we had some concerns in relation to the overarching principle 4 in the document, and the minimum service standards that councils in Northern Ireland will be expected to meet:

“Principle 4: Fees raised from obligated businesses will be used to support the management of packaging waste and the achievement of agreed targets and outcomes. This is to include the collection of a common set of packaging materials for recycling across the UK. Local authorities will be expected to meet any minimum service standards (in place in each nation) for the household collection service they provide.”

A detailed conversation will be required with the 11 councils on this, as there are no current minimum standards above the duties set out in legislation, and there were no proposals in relation to minimum standards for Northern Ireland detailed in any of the consultation documents requiring response in May 2019. It will be a priority for councils in Northern Ireland to ascertain what will be regarded as a minimum standard, who sets this standard, and to

whom they will be accountable for meeting such a standard. Any standard set in place should provide protection for councils while allowing local flexibility.

NILGA notes with interest the Charter for Household Recycling recently developed in Scotland, which is supported by COSLA. This kind of approach may be of value in Northern Ireland and could be explored as a collaborative exercise.

NILGA is of the view that statutory guidance can be brittle and inflexible, and we are aware that non-statutory guidance is already available on the WRAP website.

Proposal 13: We will continue the support by the Department for Recycle Now and the tools produced by WRAP to help Councils and other campaign partners to communicate effectively on recycling.

Q36. Do you have any comments to make about Proposal 13?

NILGA would like to highlight that substantive change to collection systems and to expected public behaviour, will require high profile and sustained communications over time, increasing costs to both the Department and to councils.

We welcome the collaborative working that is ongoing in relation to communications and are keen to see this collaborative approach continue. It is vital to ensure that an adequate resource is maintained for this work.

NILGA strongly suggests that changes to household waste collection systems are framed strongly to the public in the context of climate action, carbon reduction and reduction of single use plastics. We also strongly encourage the provision of information in a readily accessible format for elected members, who should be able to know, understand and appropriately communicate what is expected from and to their residents.

Q37. What information do householders and members of the public need to help them recycle better?

- What to recycle, in which container and when.
- How they are performing and where we would like them to improve
- Some high-level information about where their recyclate goes and what it is used for.
- Comparative costs (to them) of landfill v recycling
- Examples of local circular economy businesses, jobs

Proposal 14: We will work with Councils and others to improve transparency of information available to householders on the end destination for household recycling.

Q38. Do you agree or disagree with this proposal?

Agree – government should work with Councils and other stakeholders on this

Disagree – government should not work with Councils and other stakeholders on this

Not sure/no opinion/not applicable

Q39. Do you have any other comments to make about Proposal 14?

Any information for householders needs to be presented in a user-friendly format, ensuring good practice in information sharing.

NILGA notes that the accessing and sharing of information by or about contractors is an issue that will require further thought due to the commercial sensitivities involved. In addition, regular review of the information available will be required as contracts change over time, as do end destinations. A consistency of approach across Northern Ireland is preferable, and the requirement to share certain information could be built into contracts.

Local government has limited confidence in the information it holds from contractors, and NILGA is of the view that the onus should be on the contractors to provide end destination information. End destination capacity is limited within the UK and much of the necessary information will need to come from overseas, again resulting in confidence issues. There may be potential in using the waste transfer note system to glean information, but the regulation and enforcement issues associated with Proposal 14 will need to be considered further.

Proposal 15: We will introduce statutory regulation in line with the other three UK nations requiring Materials Recovery Facilities (MRFs) to report on input and output materials by weight to determine the average percentage of target, non-target and non-recyclable material

Q40. Do you agree or disagree with this proposal?

Agree – government should introduce regulation on MRF reporting

Disagree – government should not introduce regulation on MRF reporting

Not sure

Q41. Do you have any comments or ideas for improving reporting on MRF contamination rates?

NILGA notes that the current sampling regime provides a snapshot of activity, and the samples don't match the overall contamination risk, despite many of the MRFs in NI following UK guidelines. Greater scrutiny of rejects throughout the system would be helpful.

A move to larger samples and/or more frequent sampling would have cost and time implications for the MRF operators. MRFs differ in capacity and the equipment used, and some will require more investment than others.

This variation between facilities and contracts leads to variable information. It is also noted that if an MRF is operating as part of a wider set of facilities, there can be impacts on the accuracy of information provided.

Local government is keen to improve the consistency of information, within cost limitations and we note that contamination data can be used to better inform bin crews and residents. Our councils regularly struggle to obtain the necessary information at present, and we would be keen to see government making the process easier for facilities, perhaps through provision of standard forms for facilities operators. At present, contractors are not held to account for the information they provide; it might be possible to link payments to the provision of information.

We accept that there are inconsistencies in council reporting due to how the information is broken down but note that council officers do not regard the existing system as particularly user friendly. Additionally, staff turnover can lead to change or inconsistency in reporting practices.

Addressing these issues could form part of a wider Waste Data Flow review.

Glass Collection

To collect glass, co-mingled or not, will require investment and a robust cost-benefit analysis will be necessary if kerbside glass collections are to increase. Any increased cost to contractors would have a knock-on effect for councils. NILGA would be keen to see DAERA identify where the resource would come from to facilitate a system change of this nature.

Proposal 16: We propose developing an updated set of recycling and waste indicators to monitor performance and cost efficiency and to highlight where services may be improved. We will work with Councils to develop these and other indicators to reflect areas such as quality or contamination levels and service delivery.

Q42. Do you agree or disagree that a new set of recycling and waste indicators is required?

Agree

Disagree

Not sure/no opinion/not applicable

Q43. Do you consider that any of the current set of 15 indicators should be removed?

Agree

Disagree

Not sure/no opinion/not applicable

Q44. If you selected Agree in Q43, which indicators do you think should be removed?

The three statutory indicators need complete review, for two reasons. They are based on 2020 targets; they also form part of a wider performance improvement system with which councils are deeply dissatisfied and is due for imminent review. NILGA would urge the Department to work closely with colleagues in Department for Communities in relation to forthcoming statutory change and any potential benchmarking exercises. Any benchmarking would need to be of demonstrable benefit. The indicator W3 (in Schedule 5 of The Local Government (Performance Indicators and Standards) Order (Northern Ireland) 2015) is particularly meaningless and outwith the control of councils.

In relation to the non-statutory indicators, it is clear that a number are no longer particularly useful as importance changes over time. It is noted that many of these indicators are calculated on information from the Waste Data Flow system, which is due for review. NILGA particularly notes that DAERA uses 5 or 6 indicators to monitor their own performance, so 15 indicators for councils seems excessive.

Who captures the information, and how, is key – as is the quality control of the Waste Data flow system. NILGA is keen to ensure that information is captured for a purpose and not just for the sake of it, to ensure that the administrative (and consequent cost) burden of councils is minimised.

Information needs to be meaningful, useful to/ required by the target audience and preferably automatically generated.

Q45. Are there any specific recycling and waste indicators for household waste which you think should be included?

Given wider council activity on climate action, NILGA would be keen to see some work done to facilitate councils in developing carbon baselines.

Q46. Do you have any general comments to make about performance Indicators?

As part of any review, the Department should work with councils and other partners to ensure none of the information to be gathered is duplicative (e.g. with KNIB litter surveys), and that the end product is useful and meaningful, with a well-defined target audience.

Proposal 17: We will look at metrics that can sit alongside weight-based metrics and will work with stakeholders to develop these to better measure reductions of carbon emissions associated with waste in Northern Ireland.

Q47. Do you agree that alternatives to weight-based metrics should be developed to understand recycling performance?

Agree

Disagree

Not sure/no opinion/not applicable

If you selected Disagree, please explain why.

Q48. Do you agree that these alternatives should sit alongside current weight-based metrics?

Agree

Disagree

Not sure/no opinion/not applicable

If you selected Disagree, please explain why.

If more than one system of metrics is to be used, it must be made clear which is the priority and where compliance is expected.

Q49. What environmental, economic or social metrics should we consider developing as alternatives to weight-based metrics?

NILGA is keen to see greater use of carbon and GHG metrics, and notes that any forthcoming Climate Action Act is likely to require carbon and GHG monitoring, but we are also aware that the Circular Economy Package targets remain weight based.

We also note the current interest in the development of a Well-being Budget in New Zealand and how this may be used to inform the next PfG in Northern Ireland, and also its use to inform the work of Carnegie UK Trust in 'Embedding Well-being in Northern Ireland'.

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