

# Women's Policy Group NI

## WPG NI Response to Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI

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## **1. Introduction:**

The Women's Policy Group (WPG) is a group of policy experts and practitioners who advocate collectively for women and girls by promoting gender equality through an intersectional feminist lens. We challenge systemic injustice and discrimination affecting women and girls by informing society and influencing policy and law. Our work is informed by women and girls' lived experiences and rooted in international human rights law.

The WPG is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBTQ+ organisations, migrant groups, support service providers, NGOs, human rights and equality organisations and individuals. Over the years this important network has ensured there is good communication between politicians, policy makers and women's organisations on the ground. The WPG is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level.

If you have any questions or queries about this response, or would like to discuss this evidence further with the WPG, please contact Elaine Crory, Women's Sector Lobbyist at [elaine.croory@wrda.net](mailto:elaine.croory@wrda.net)

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency
- Meghan Hoyt - Women's Resource and Development Agency
- Rebekah Corbett - UNISON

Please note that this response also includes evidence from other WPG work, compiled by a range of WPG members, and not all member organisations have specific policy positions on all the areas covered in this response.

### 1.1 Endorsements

The WPG would like to endorse the response submitted to this call for evidence by Unison NI.

## **2. Past Consultations Responses, Evidence Submissions and Briefings:**

The WPG has published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating to

resources, the management of waste, and the circular economy. Responses made by the WPG, and some of our members, in relation to these issues include:

- WPG Response to Circular Economy Consultation (March 2023)<sup>1</sup>
- WPG Covid-19 Feminist Recovery Plan - Key Briefing - Climate Change (March 2021)<sup>2</sup>
- WPG Response to Discussion Document on Climate Change Bill (Feb 2021)<sup>3</sup>

## 2.1. Content from previous WPG Responses

The work of the WPG is grounded in an intersectional feminist understanding of the Climate Crisis. As such, our responses to this consultation are informed by an analysis that sees the struggle for gender justice as intimately connected to the struggle for a sustainable, livable future. Failure to recognise and address gender inequality in the context of developing sustainable policy runs the risk of “replicating gender inequality in any future green economy”.<sup>4</sup> One outworking of this approach entails the foregrounding of a class-sensitive,<sup>5</sup> structural understanding of climate change when assessing measures to mitigate climate breakdown. As such the WPG argues that solutions should focus urgently on the “implementation of international and national measures for coordinated action on mitigation and adaptation”<sup>6</sup>, rather than locating primary responsibility for climate mitigation within private households.

In response to the consultation on a Circular Economy Strategy for Northern Ireland, we wrote:

“The Northern Ireland Climate Change Act came into force in 2022. The Women’s Policy Group were actively involved in helping to draft this legislation and have a vested interest in seeing its full implementation. In particular, the Women’s Policy Group lobbied hard for the inclusion of a gender proofing provision in the Climate Change Act, to ensure that all measures taken to tackle the climate crisis do so in a way that is conducive to promoting gender equality, by applying an intersectional feminist lens to decision-making. This means analysing the potential and actual

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<sup>1</sup> <https://wrda.net/wp-content/uploads/2023/03/WPG-Response-to-Circular-Economy-Consultation-final.pdf>

<sup>2</sup> <https://wrda.net/wp-content/uploads/2021/03/Climate-Justice-Key-Briefing-V2.pdf>

<sup>3</sup> <https://wrda.net/wp-content/uploads/2021/02/WPG-Response-to-Discussion-Document-on-a-Climate-Change-Bill-01.02.21.pdf>

<sup>4</sup> Mellor, M. (2006) ‘Ecofeminist Political Economy’ *International Journal of Green Economics* Vol:1 (2) p. 140.

<sup>5</sup> Rao, N., vanRuijven, B., Riahi, K. & Bosetti, V. (2017) ‘Improving poverty and inequality monitoring in climate research’ *Nature Climate Change*. Vol: 7 pp. 857 - 862.

<sup>6</sup> Heyd, T. ‘Climate Change, Individual Responsibilities and Cultural Frameworks’ *Human Ecology Review*. implementation of international and national measures for coordinated action on mitigation and adaptation. Vol: 17 (2) p. 87.

impacts of policies on women and using this analysis to identify ways to both mitigate against harmful impacts and promote positive impacts.

The Climate Change Act puts a legal responsibility on the Department for the Economy to ensure that all measures taken to help tackle the climate crisis, including this Circular Economy Strategy, are subject to gender proofing. This goes further than simply carrying out an Equality Screening or Equality Impact Assessment of impacts for Section 75 groups. Gender proofing requires an in-depth consideration, from a gendered perspective, of questions such as:

- How are women and men impacted differently by the climate crisis?
- Which industries will benefit from these measures? Are these male dominated industries? How can women be encouraged into these industries?
- Is there a skills gap between men and women in particular green industries? How can this gap be addressed?
- How can this Strategy promote a Circular Economy in Northern Ireland in a way that both prevents negative impacts and actively seeks to improve and reduce inequalities?
- Based on an understanding of pre-existing gender inequalities, how will this Strategy impact men and women respectively?

The Women's Policy Group is keen to assist and engage with the Department to ensure that the Circular Economy Strategy works for women and all people in Northern Ireland by addressing inequalities while implementing measures to help tackle the climate crisis."<sup>7</sup>

The Rethinking Our Resources policy proposals obviously come from a different department and convey different responsibilities, but the approach taken by the WPG is the same; we continue to take an approach centred on a Just Transition and an approach that focuses on gender-proofing policies to ensure that they do not have a disproportionate impact on women.

### **General Comments on the Rethinking Our Resources Consultation**

The WPG is committed to lobbying for a circular economy in Northern Ireland as a means through which issues of over-consumption can be addressed, resulting in a more equitable use of the earth's finite resources. In line with recent research, the

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<sup>7</sup> WPG NI, 2023, Response to the Circular Economy Strategy, p.8-9. Available at: <https://wrda.net/wp-content/uploads/2023/03/WPG-Response-to-Circular-Economy-Consultation-final.pdf>

WPG argues for the use of “collective solutions and investment in social infrastructure”<sup>8</sup> as part of a just transition to a sustainable future. The WPG welcomes the Climate Change Act 2022 as a positive step for Northern Ireland, and is keen to see the targets set by the legislation not only met, but exceeded, through bold government action. This consultation is based on the requirement for at least 70% of waste to be recycled by 2030, a target that will necessitate new forms of intervention.

### 3. Response to Consultation Questions

#### **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

2. 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.*

Given the urgency of addressing the Climate Crisis, no extensions should be given. Two years is sufficient time for Councils to amend these services.

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<sup>8</sup> Ivanova, D. & Wood, R. (2020) ‘The unequal distribution of household carbon footprints in Europe and its link to sustainability’ *Global Sustainability*. Vol: 3 (18) p. 8.

3. 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.

**Other - 240 litre capacity bins collected three weekly.** As outlined by DAERA, this option does not require the wholesale purchase and distribution of new, smaller, containers. In Council areas where 240 litre capacity bins are not used at present, efforts to source these should begin before the policy is introduced.

4. 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**

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**

*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*

6. 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?

Household comprises more than 6 residents.

**Yes** - additional capacity required

Households where citizens have medical conditions which produce additional waste, such as produce to manage incontinence.

**Yes** - additional capacity required

Households where there are more than two children using disposable nappies.

**Yes.** The WPG would like to see a simultaneous up-scaling of Belfast City Council's reusable nappy scheme, and its extension to all Council areas. This scheme allows parents to try using reusable nappies for two weeks for free, as well as a £30 refund on the cost of buying cloth nappies should the parents decide to proceed with this option. The development and piloting of an affordable nappy collection scheme should be a priority. Similarly, some Council areas have used schemes along these lines to trial reusable period products, to encourage more sustainable options and to reduce waste, which we support.

All households in the collection subsequent to the Christmas break, where presentation of a restricted amount of side waste is acceptable.

**Yes.** The WPG would like to see the simultaneous roll out of a targeted education campaign aimed at reducing waste at Christmas.

**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?

**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**

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.

Again, the **WPG does not believe that extensions to timescales should be permitted**. Extending timelines might encourage delay and meeting these targets should be seen as urgent.

**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).

**N/A Timelines should not be extended.** Collecting and recycling these materials should be treated with urgency

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**

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**

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).



**It is the responsibility of the Department to keep pace with global best practice and assist Councils to implement measures to recycle new materials as soon as possible.**

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?

**Glass:** Ceramics, for example crockery, earthenware Drinking glasses Flat glass Glass cookware including Pyrex® Light bulbs and tubes Microwave plates Mirrors Vases Window glass.

**Metal:** 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.

**Plastic:** 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. Plastic pouches with laminated foil layer for example pet food pouches, coffee pouches. Plastic bottles containing white spirits, paints, engine oils and anti-freeze. Bulky rigid plastics such as garden furniture, bins, and plastic toys. Polystyrene (expanded and high impact). Polyvinyl chloride (PVC) packaging.

**Paper and card:** 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.

**Unsure. The Department should endeavour to keep pace with global best practice in this regard. As soon as materials listed above are recyclable, the Department should move rapidly to support Councils to recycle these items.**

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**

**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**

**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 "multistream," with at least: (i) fibres (paper/card), (ii) plastics, (iii) metals, and (iv) glass separately from each other in the dry recycling collection?

**Yes**

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**

**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**

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**

3. Do you agree or disagree with the recommendation that Councils should review and re-submit written assessments at least every 7 years?

**Revising written assessments at least every 7 years is too infrequent** (please state how frequently you think they should be revised and evidence why).

Assessment every 7 years leaves room for complacency and for standards to slip below what is needed and what should be expected. Councils should endeavor to move as many households as possible to a collection model that prioritizes separated collection of core dry recycling. Therefore written assessments should be revised every 2 years.

**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.**

**Yes**

**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:

Gate fees and material income.

Salaries and staff numbers - including supervision.

Container costs, numbers, and replacements.

Vehicle types, costs, finance, depreciation, hire, running costs.

Quantities of materials collected, frequency of collection.

Associated overheads including depot costs.

Contract length, penalties associated with variations.

Other (please detail)

**Yes agree**

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

Adverse environmental costs. **Yes**

Adverse health impacts. **Yes**

Potential for efficiency improvements. **Yes**

Revenues from sales of secondary raw materials. **Yes**

Application of the polluter pays principle. **Yes**

Application of Extended Producer Responsibility. **Yes**

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?

**Unsure**

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.

**We cannot answer this question adequately due to a lack of technical expertise.**

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

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.

Emissions from disposal/ treatment including savings arising from landfill diversion; and

Carbon savings from using recycled materials rather than virgin materials.

Other factor to be added - please describe

**Yes - agree**

6. Do you agree that the following evidence factors should be provided by a Council to demonstrate that materials are of comparable quality.

Comparable quantities (+/-2%) of each material stream sent for closed loop recycling.

Comparable quantities (+/- 5%) of each material stream sent for open loop recycling.

Other factor to be added - please describe.

**Yes - agree**

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**

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**

**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.

**Option A** - “three stream” • Separate stream of glass bottles & jars; with • Separate stream of paper & card; with • Mixed stream of: metal packaging and plastics bottles, tubs, and trays

**Option B** - “two stream: fibres out” • Separate stream of paper & card; with • Mixed stream of: metal packaging, plastic bottles, tubs and trays and glass bottles & jars

**Option C** - “two stream: glass out” • Separate stream of glass bottles and jars; with • Mixed stream of: metal packaging, plastics bottles, pots & trays, and paper & card

**Option D** - “fully co-mingled” • Mixed stream of: metal packaging plastics bottles, pots, tubs & trays, paper, card, and glass bottles & jars

*Rank Options with 1 - most preferred. Provide explanation as to why.*

**No preference**

**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.

**No - all material streams should be collected separately.**

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?

**We cannot answer this question adequately due to a lack of technical expertise.**

**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).

A separate weekly collection of food waste with additional arrangements for garden waste. **(1)**

A weekly mixed food and garden waste collection. **(3)**

A separate fortnightly collection of food waste with additional arrangements for garden waste. **(2)**

A fortnightly mixed food and garden waste collection. **(4)**

Other - please detail.

*Rank Options with 1 - most preferred. Provide explanation as to why.*

Separated collection food waste and garden waste is the more economical option and is therefore our preferred option, and second most preferred. Mixed options are acceptable as a third and fourth preference.

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**

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**

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?

**24 months from notification of a statutory requirement.**

**Yes**

5. Do you agree that guidance should be provided on caddy liners, including on caddy liner material types.

**Yes**

6. Do you agree that caddy liners should be provided free of charge to citizens that participate in food waste collection?

(1) Yes, via Council offices, libraries, leisure centres etc.

**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.**

**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**

2. Do you agree that the following options should be adopted to help to improve the quality of recycling collected from households

Issuing standardised information in the form of leaflets to citizens at least annually.



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.

Other - please detail

**Yes**

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?

**Other value you feel is appropriate - please detail.**

**Fines for incorrectly sorted waste are disproportionately punitive to those on lower incomes. We recommend removing fines for private households and reserving punitive measures for non-compliance for companies. These fines for companies should be sizable.**

*Presently too high for individuals, too low for private companies*

**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**

2. Do you agree that the following topics should be included in Non-Statutory Guidance to Councils on collections:

Collection of hazardous waste from HWRCs.

Collection of textiles, batteries, WEEE from the kerbside and communal properties.

Collection of cooking and engine oil from the kerbside.

Collection of AHPs (nappies, incontinence products) from the kerbside.

Standardised arrangements for assisted collections from the kerbside.

Standardised price ranges and arrangements for bulky waste collections.

Standardised arrangements for replacement containers.

Standardised arrangements for excess recycling.

Other - please detail.

**Yes**

**PART 2: Proposals to improve consistency in recycling from business to 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**

**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?

**Paper and card**, including newspaper, cardboard packaging, office, writing paper etc.

**Glass bottles and jars** - including drinks bottles, condiment bottles, jars etc and their metal lids.

**Metals:** aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes.

**Plastic bottles** - including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays plus cartons (such as Tetrapak).

***Agree - all items in row included***

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?

**Glass:** Ceramics, e.g., Crockery or earthenware Drinking glasses Flat glass Glass cookware including Pyrex Light bulbs and tubes Microwave plates Mirrors Vases

**Metal:** Laminated foil i.e., pet food pouches, coffee pouches. General kitchenware i.e., cutlery, pots, and pans. Any other metal items, i.e., kettles, irons, pipes, white goods.

**Plastic:** Any plastic packaging or nonpackaging 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. Plastic pouches with laminated foil layer i.e., pet food pouches, coffee pouches. Plastic bottles containing white spirits, paints, engine oils and antifreeze. Bulky rigid plastics such as garden furniture, bins, and plastic toys. Polystyrene (expanded and high impact) Polyvinyl chloride (PVC) packaging.

**Paper and card** 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 .

***Unsure. While it is currently not possible to collect for these materials, this should be reviewed and more items should be added as soon as practicable.***

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**

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**

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?

**We cannot answer this question adequately due to a lack of technical expertise.**

**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.**

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.

**We cannot answer this question adequately due to a lack of technical expertise.**

**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**

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).**

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?

We believe that the measures proposed could have a significant impact on the recycling of food waste from obligated businesses. We welcome the efforts made to ensure that food waste does not go to landfill; not only as we need to reduce waste sent to landfill overall, but also because of the benefits associated with recycling with food material.

In addition, there are measures that should be considered to ensure that food waste is generated at lower levels overall, particularly on an industrial scale. In terms of examples of best practice elsewhere, there are several other case studies available from New Zealand<sup>9</sup>, Germany's food waste strategy<sup>10</sup>, and France's approach to supermarket waste<sup>11</sup> that we recommend researching and learning from in the efforts towards reducing food waste in Northern Ireland.

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?

**Yes**

As above, Northern Ireland should endeavour to learn from other countries that have made efforts to reduce food waste via working with supermarkets and restaurants etc to facilitate the removal and re-use of unsold food items. This is not only a valuable way to reduce waste, it is also a public good if implemented properly to

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<sup>9</sup> Sustainable Business Network (2022). Case Studies. [online] sustainable.org.nz. Available at: <https://sustainable.org.nz/learn/case-studies/>

<sup>10</sup> Press and Information Office of the Federal Government, Germany (2023). Halving food waste. [online] Website of the Federal Government | Bundesregierung. Available at: <https://www.bundesregierung.de/breg-en/service/archive/halving-food-waste-1582700#:~:text=Since%202012%20the%20%22Zu%20gut>

<sup>11</sup> [https://zerowasteurope.eu/wp-content/uploads/2020/11/zwe\\_11\\_2020\\_factsheet\\_france\\_en.pdf](https://zerowasteurope.eu/wp-content/uploads/2020/11/zwe_11_2020_factsheet_france_en.pdf)

reduce hunger and help those in difficult financial times access adequate and healthy food. Again, see examples referenced above from New Zealand, Germany and France.

**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.** Anaerobic digestion presents significant environmental benefits and contributes to the development of a circular economy by capturing the methane from food and other organic waste and converting it into a source of renewable energy and high-quality fertilizer.

**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?

**Separate glass bottles and containers** Including drinks bottles, condiment bottles, jars, etc.

**Separate Paper and card** Including newspaper, cardboard packaging, writing paper, etc.

**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)

**Yes**

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

It is imperative that businesses and the NHM sector rapidly develop high quality dry recycling collection schemes. This is an important part of shifting the responsibility for tackling climate change from individual households to other social institutions.

**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.

**We cannot answer this question adequately due to a lack of technical expertise.**

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:

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

Emissions from disposal/ treatment including savings arising from landfill diversion

Carbon savings from using recycled materials rather than virgin materials.

Other factors to be added - please describe

**Yes**

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?

Comparable quantities (+/-2%) of each material stream sent for closed loop recycling.

Comparable quantities (+/- 5%) of each material stream sent for open loop recycling.

Other factors to be added - please describe

**Yes**

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?

**We cannot answer this question adequately due to a lack of technical expertise.**

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?

**We cannot answer this question adequately due to a lack of technical expertise.**

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

**We cannot answer this question adequately due to a lack of technical expertise.**

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?

**We cannot answer this question adequately due to a lack of technical expertise.**

**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**

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**

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**

4. Do you agree with the recommendation that waste collectors should review and re-submit written assessments at least every 2 years?

**Yes**

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?

**We cannot answer this question adequately due to a lack of technical expertise.**

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**

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

**We cannot answer this question adequately due to a lack of technical expertise.**

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**

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.

**We cannot answer this question adequately due to a lack of technical expertise.**

**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** - this is certainly a necessary step in the right direction, but we would urge DAERA to remain engaged with waste management in order to constantly improve the recycling provision as technology progresses.

**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.

**We do not have the data to know which is the most pressing.**

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?

1:1 support provided/offered to obligated businesses and organisations. **Very useful**

National, regional, or local communications campaigns. **Useful**

National guidance and good practice case studies. **Useful**

Dedicated website including online business support tools (e.g., online calculator and good practice guidance). **Very Useful**

Other (please specify).

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?

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).

**All of the above**

4. Do you have any views on how Government could support businesses, public bodies, or other organisations to procure waste management services more collaboratively?

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)

**All of the above**

**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**

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.

**24 months from notification of a statutory requirement.**

3. Are there any other obligated businesses, public bodies or other organisations in your opinion that should be exempt from the proposed requirements?

No, it is crucial that recycling targets are met as quickly as possible. As such, businesses, public bodies and other organisations should strive to meet these targets. Providing exceptions could potentially encourage delay.

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.

**We do not believe that extensions should be extended in any circumstances.**

**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?

**We cannot answer this question adequately due to a lack of technical expertise.**

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:

**We cannot answer this question adequately due to a lack of technical expertise.**

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:

**We cannot answer this question adequately due to a lack of technical expertise.**

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.

**We cannot answer this question adequately due to a lack of technical expertise.**

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

**We cannot answer this question adequately due to a lack of technical expertise.**

**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**

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. **Yes - in some Council areas availability of time slots are restricted and users have to book in advance.**

Risk of abuse which may cause recycling containers to fill up quickly. **Yes**

Risk of contamination to recyclables meaning collected materials are less likely to be recycled. Sites encourage fly-tipping or litter. **Yes**

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?

**Yes**

**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.**

**HWRC access will enable us to recycle more of our waste due to the range of accepted materials.**

4. Are there any barriers, which we should be aware of, should HWRCs be made accessible to obligated businesses, public bodies, and other organisations?

**We cannot answer this question adequately due to a lack of technical expertise.**

**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** - Although regular reporting and oversight is needed to ensure compliance.

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?

**No**

If you have answered No, what value do you feel the fixed penalty notice for non-compliance should be increased to?

£400

£500

£600

£700

*Select one.*

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.

The WPG believes that the fines should be tiered based on the severity of the non-compliance. Ideally they would also increase for repeat offenders. This approach is likely to produce a more preventative effect than a fixed fine, that may be minimal in comparison with the financial wherewithal of the company.

### **Additional Comments**

To conclude, we welcome efforts made to improve how we manage our waste, to encourage recycling, and to increase compliance requirements for all, and in particular for non-household waste producers. We urge that the department take seriously the need to proceed rapidly with the changes needed, to require regular reporting and not to allow for delays to be introduced. There is an imperative to act now and to keep pace with developments so that we can continue to offer the best options to citizens in Northern Ireland.

*ENDS*



*For any questions or queries relating to this submission, please contact:*

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