



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING  
ADVISORY COMMITTEE

Bernie Conlon  
Department of the Environment  
Environmental Policy Division  
44-58 May Street  
Belfast  
BT1 4NN

14 October 2011

Dear Sir/Madam

**Consultation on an Addendum and Delivery Programme to the Northern Ireland Waste Management Strategy 2006-2020**

I am writing to present the LARAC response to the above Consultation, which is contained below, and I thank you for the opportunity to respond.

The responses below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of around 380 local authorities across England, Scotland, Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Our response has been peer reviewed by members of LARAC's policy team and executive committee. LARAC members have also been invited to comment on the consultation through the members' discussion forum on our website. All contributions received have been taken into account in drafting the response below.

LARAC concurs with the Department's view that the development of an effective Strategy is a dynamic process, and we welcome the opportunity to comment on the prioritised programme of interventions detailed in Table 1 of the consultation document.

Overall, we broadly support the interventions outlined, however, we feel that much greater detail is required regarding how the difference between targets and required outcomes will be reconciled in certain key areas. Please find our detailed comments below.

If you have any queries on this response then please contact me at [larac@armagh.gov.uk](mailto:larac@armagh.gov.uk) or 028 37529624

Yours faithfully,



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Ms Liz Drew  
**LARAC Policy Team**

cc. Mark McAdoo, LARAC NI Representative & Waste Manager/Senior Technical Officer, Cookstown District Council: [mark.mcadoo@cookstown.gov.uk](mailto:mark.mcadoo@cookstown.gov.uk)



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## DOE NI CONSULTATION ON AN ADDENDUM AND DELIVERY PROGRAMME TO THE NORTHERN IRELAND WASTE MANAGEMENT STRATEGY 2006-2020

### COMMENTS

#### Intervention A: Prevention and Recycling

**Zero Waste:** As both the Scottish and Welsh governments have expressed a desire to move toward zero waste, and DEFRA has recently committed to consulting on a zero waste action plan on waste prevention (consultation document: Section 4.11), LARAC would welcome early clarification on whether the Department is considering similar.

If so, we feel the sustainable consumption and production agenda must be considered in totality and confirmed, direct actions identified in order to achieve identified waste prevention targets.

**Waste Prevention:** LARAC wholeheartedly supports the move toward managing wastes at the top end of the waste hierarchy, with the main emphasis being on reducing waste. The development of a Waste Prevention Programme is welcomed by members, and we look forward to being able to contribute to its development over the next 2 years.

**Recycling Targets:** As stated in our response to the earlier consultation on the proposed new Recycling Policy for Northern Ireland, LARAC feels that a regional target municipal recycling rate of 60% by 2020 may potentially be both achievable and appropriate.

However, LARAC notes that the only statutory target for recycling is 50% of household waste by 2020. In order for member authorities to plan for the medium to long term we feel urgent clarification is needed regarding whether the 60% target will remain aspirational and intended to "complement" the targets set under Article 11(2) of the rWFD, or will in fact be made legally binding as, if this were to be the case, it could have a massive impact on councils with regard to planning and investment for infrastructure, collection systems, communications and resources.

LARAC feels that in order for member councils to plan for the future prompt clarification is needed as to whether the Recycling Policy will be part of a new overarching regulatory framework similar to those adopted in Wales and Scotland, or simply a non-mandatory guide to best practise.

If made mandatory, the 60% recycling rate would go beyond the rWFD target not only in scale but also in scope as it would relate to municipal waste and not just "waste from households" as defined in the Directive (which is even less than simply "household waste"). The rate for municipal waste recycling for 2009/10 was, at 33.1%, lower than the household waste recycling rate of 35.6%. As such there would be an even bigger gap to make up in order to achieve the 60% target.

Members further feel that setting local targets of 60% could lead to disproportionate amounts of money being spent on recycling – particularly in those areas where high levels of recycling may be unlikely due to other geographic, socio-economic or housing factors.



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However, if such a target were to become mandatory, members believe the figure to be achievable if the Department is prepared to, for example:

- Re-classify some materials (such as bottom ash and fly ash) as recycled if they are included in building materials
- Enable councils to receive credit (either Reuse or Recycling) for materials reused and prepared for reuse. Currently, materials collected for reuse are not included in recycling figures for Waste Data Flow purposes although do contribute toward an overall reduction in waste arisings
- Consider inclusion of, or accreditation for, the tonnages of materials diverted via local authority Home Composting promotions. We feel that if there is a conflict between local authority success at reducing waste by home composting schemes and achieving high recycling rates, it would be the waste reduction that should be given priority.

Finally, LARAC welcomes the Department's on-going commitment to funding infrastructure and programmes that will reduce waste and promote recycling. However we feel that, to date, this support has been somewhat ad hoc with 3 rounds of funding being issued relatively suddenly and in quick succession. We would welcome a longer-term, phased programme of support that would allow councils to better plan for the medium-long term in order to meet both statutory and proposed targets.

### **Commercial and Industrial Waste Data**

Whilst we welcome the Department's commitment to improving the quality and quantity of data available on Commercial and Industrial (C&I) waste (consultation Document: Section 3.11), our member feel that prompt clarification is also required regarding the elements of what is currently classed as C&I waste that will be included in municipal waste for the purposes of setting and meeting targets (Section 4.10 (b)). We feel such clarity to vital in enabling local authorities to more accurately plan and invest for the medium and longer term.

### **Intervention B: Construction and Demolition**

Comments as per those made in our response to the Department's recent consultation on Site Waste Management Plans.

### **Intervention C: Landfill Diversion**

With the EU currently considering a ban on biodegradable waste to landfill by 2025, LARAC would potentially support "beyond best practice" targets for BMW to landfill. However, if this were to be the case, then we would also urge consideration by the Department of new standards such as PAS 111 may impact on diversion rates.

LARAC would also welcome clarification by the Department on the future of NILAS as this does not appear to have been mentioned in the Addendum.



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**Infraction fines:** LARAC members would welcome early clarification from the Department on the position regarding EU fines resulting from a failure to comply with EU landfill diversion targets.

**Intervention D: Development of future policy**

No comment