

## **RESPONSE TO THE CONSULTATION ON DRAFT ENVIRONMENT STRATEGY FOR NORTHERN IRELAND**

### **from the Advisory Committee on Packaging**

We have comments as follows in relation to specific portions of the draft strategy. If you need more information please contact us:

#### **17. Energy**

We recommend that the manufacture and use of biogas should be a mainstay of this strategy. Carbon tax on natural gas that is ring-fenced to subsidise the production of biogas via grants and subsidies would be hugely beneficial to the decarbonisation of the gas grid and road transport and can be revenue neutral to the exchequer. A grant should be considered to help purchase electric or biogas vehicles. Insulation and reduction in need for gas needs to be aligned to the production of green gas as the potential for green gas is insufficient to deliver a like for like in volume for fossil gas. Transfer to other renewable forms of heating and cooking should also be included.

#### **19. Producer Responsibility**

To increase recycling of waste we recommend a levy on unrecyclable material. In that light, we support the introduction of Extended Producer Responsibility wisely designed. Packaging Waste Recovery Notes (PRNs) are a useful market mechanism to incentivise recycling. Their principle could be extended to encourage the right behaviour at other stages, eg, at waste collection. Net zero calculations should be encouraged at each stage of the supply, processing and use chain, so that over time they could be used for the right behaviour.

We have not supported a Deposit Return Scheme (DRS) for containers as previously proposed because of the additional costs that will flow to consumers through loss of value to local authorities and creation of a costly new system. If a DRS is introduced it should be a digital DRS, since it would have the following advantages:

- It is more convenient for the public as they can use their household recycling bins, workplace recycling bins and 'on-the-go' recycling bins, and no harm would entail to the fine kerbside collections by local authorities,
- It has a much more positive carbon impact as there are fewer trips required,
- It can be used with a wide range of packaging waste of different shapes, sizes, and materials, and
- It would have lower start-up and maintenance costs.

However, we do understand the need to evaluate additional costs in such a scheme since confirmation of return and lack of fraud by consumers might need additional personnel.

#### **20. Reducing Single-Use Plastics (SUP)**

We have commented recently on your SUP consultation. We propose reasonable levies and monitoring of industry voluntary agreements to reduce SUP, collect waste and replace by recyclable material or reuse. We also recommend co-ordination with the rest of the UK so that industry are not faced with lack of scale economies due to different regimes.

We suggest that there can be reuse and recycling options in many cases where SUPs are currently used. For example, single use plastic drinking cups are used in large numbers at sporting events, festivals, shows and other gatherings.

We believe that:

- (1) Any money raised from the levy should be ring-fenced to support reuse and recyclable material,
- (2) There should be well-designed and accountable voluntary schemes,
- (3) The levy should not be too large in comparison to the cost of the product purchased, and
- (4) There should not be a ban put in place because SUPs have valid uses, until enough time has been given to industry and the public to develop and adapt to alternatives.

#### **21. Carrier Bags**

We have commented separately in response to your carrier bag levy consultation.

We support a reasonable increase in the plastic bag levy to increase further the use of recyclables or reuse materials. We would support a modest tax or price on home-delivery packaging including plastic bags to encourage reduction of material use and innovation towards re-use; home-delivery packaging is likely to continue to grow in volume for some time. We also support the use of net zero calculations for all carrier packaging, so that over time even better behaviour could be encouraged.

### **23. Environmental Permitting**

We support the move to a single standardised and streamlined regime for authorising environmental activities with greater transparency about quality offered by operators. We also support moves to digital, cheaper, and quicker methods of processing.

### **25. Circular Economy**

We support a circular economy defined to mean reuse or recycling of all waste so that some value is generated again. Specific incentives to reduce material use as well as reuse/refill would be welcome. We support the production of renewable energy from biodegradable waste materials to be used in industry in place of non-renewable energy including inputs to the electricity grid and use in transport fuels. Government should support feed treated biogas to the national gas grid in the future.

Combustion of plastics has a negative carbon impact mainly in residual waste. We need mechanisms to move plastics from residual waste into recycling or generation of other value.

### **26. Waste Management**

We recommend that the new waste management strategy quantifies the carbon impact of waste management in Northern Ireland currently and also quantifies the carbon reduction associated with the future waste management targets set in the strategy. The strategy should then evaluate the requirements for the sector to become carbon neutral by 2035 or 2040. Bringing waste management into the Emission Trading System should be tested for impact.

We support Extended Producer Responsibility wisely designed to further increase recycling. We support additional measures with regard to presentation of food waste at commercial premises that produce food waste. In order to enhance public confidence in the waste industry, we favour robust verification of industry data on end destinations and material quality, and mandatory accessible reporting by each council or processor. We suggest that landfill disposal of waste should be reduced to 10% by 2030 and landfill tax could further be increased. There is currently unfulfilled potential to recover metals and rigid plastics from residual municipal waste along with potential to reduce the biodegradability of waste disposed at landfill in Northern Ireland. We therefore recommend a prohibition on the landfill disposal of untreated waste as soon as possible. This would encourage the development of treatment facilities for residual waste (e.g. MBT or MT followed by BT1), which in turn would maximise recycling and minimise disposal, in compliance with the waste hierarchy. There is also a role for communicating and working directly with households and consumers on better waste management.

While we fully support the waste hierarchy we cannot favour one technology over another. We believe energy use needs to be maximised as well as product use. Explicitly recognising waste being processed into molecule or electron would be welcome. We believe that this should be recognised in policy. Recyclables left in residual waste need more support to be removed and an end market developed. This needs to be recognised in the waste hierarchy and fiscal policy to make recycling work when put in the wrong bin. In order to drive a circular economy there need to be 'pull' measures for secondary raw materials, so the requirement for recycled content in products is helpful. We suggest that this should apply to appropriate open loop recycling options as well as closed loop recycling, ie, recycling to make a different product can be just as good as recycling to make the same product in many cases.

End of Waste is necessary for secondary raw materials to be used in the manufacture of new products, so we suggest the establishment of an expert working group to prepare End of Waste applications for a range of recycled materials that can be used in Northern Ireland or elsewhere. We also suggest that resource sufficiency within NI Environment Agency be examined to review end of waste applications. Its present process is cumbersome and should be simplified for business opportunities being realised. Emphasis should be placed on the quality of the final product,

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not where the input material has come from. If the conditions of the OSS test case 2 have been met this should suffice.

Additional reprocessing facilities for recyclables would be particularly welcomed as processors rely on some export markets that are volatile and somewhat unpredictable (paper and plastic in particular). While we support the principles of self-sufficiency and proximity but as a small country on a small island it is unlikely that Northern Ireland will ever be fully self-sufficient in waste management. Export is likely to continue into the future and must be facilitated by the relevant state bodies to allow the waste management system to function well. Ideally, waste should be treated in a manner that has the best carbon impact in the context of global warming, regardless of whether the final treatment is in Northern Ireland or abroad. Net zero calculations and then incentives based on them are the way forward.

## **27. Illegal Waste Disposal & Fly-tipping**

We support the proposed actions on illegal waste disposal and fly-tipping. Fines should be increased for deterrence. Enforcement and regulation could be concentrated in a specialist body or privatised. Schemes to encourage businesses or organisations close to problem spots to maintain them can help as fly-tipping and illegal waste disposal is more likely to occur if the miscreant feels he or she is not observed and the area is uncared for.