

Rethinking Our Resources: Measures for Climate Action and a Circular Economy in NI Consultation

AVA Response – 27 June 2024

Consultation Period

This consultation will run from Thursday 7th March 2024 and close for responses at 5pm on 27th June 2024.

1. What is your name?

Name **David Llewellyn**

2. What is your email address?

Email **David.Llewellyn@the-ava.com**

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

(Required)

- **Yes**
- No

If Yes, please move to Question 5.

4. You selected “no” to Question 3. This means that you are responding to the consultation as an individual householder/member of public. If this statement does not describe how you wish to respond, please amend your answer to Question 3. If you are happy to proceed, please select Yes. If you select No, the survey process will end.

Yes. I am responding as a householder/member of public.

No

If Yes, please proceed to Proposal 1.

5. Which category best represents you from the list below?

- Trade Body (Waste Sector)
- Local Council
- Local Council Sector Body
- Waste Management Company (Collectors, Sorters, Infrastructure Operators of Treatment Facilities for various streams)
- Reprocessors (End Destination)
- Non-Governmental Organisation (NGO)

- Businesses and Non-Household Municipal (NHM) producing organisations
- Trade Body (representing business sectors)
- Other

If applicable, please state the name of the organisation you are responding on behalf of

AVA: The Vending & Automated Retail Association

Proposal 13: Non-Household Municipal Waste – Out of Scope Producers

Proposal 13: The new definition of municipal waste

1. Do you agree with the list of out of scope waste producers, who will not be obligated to segregate a core set of dry recyclables from their residual waste?

- Yes
- No
- Unsure

If you disagree with this proposal, then please provide your reason with supporting evidence in the box below.

Proposal 14: Non-Household Municipal Waste – Core Set of Dry Recyclables

Proposal 14: Options to increase the amount of recycling from the wider NHM sector

1. Do you agree with the contents of the list below, detailing the materials that should be included in the recyclable waste streams collected separately from those obligated businesses, public bodies, and other organisations by waste collectors, as a minimum?

	Agree. All items listed in the row should be included	Disagree. All items listed in the row should not be included for recycling	Unsure
Paper and card, including newspaper, cardboard packaging, office, writing paper etc;	X		
Glass bottles and jars – including drinks bottles, condiment bottles, jars etc and their metal lids	X		
Metals: aluminium cans, foil and aerosols, and steel cans [and aerosols], aluminium tubes	X		
Plastic bottles – including drinks bottles, detergent/ shampoo/ cleaning products; pots, tubs, and trays plus cartons (such as Tetrapak)	X		

If you select disagree to any of the above, please state which items should not be included and why.

2. Do you agree with the contents of the list below, detailing those materials that should be excluded currently from dry recyclable waste streams and therefore not collected by waste collectors from obligated businesses, public bodies, and other organisations, as a minimum?

	Agree. All items listed in the row should be excluded from recycling	Disagree. Items listed in the row should be included for recycling	Unsure
Glass: Ceramics, for example crockery, earthenware; Drinking glasses; Flat glass; Glass cookware including Pyrex®; Light bulbs and tubes; Microwave plates; Mirrors; Vases; Window glass	X		
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	X		
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	X		
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	X		

If you select disagree to any of the above, please state which items should not be included and why.

3. Do you agree that the list of materials to be collected as a minimum should be regularly reviewed, and providing certain conditions met, expanded?

- Yes
- No
- Unsure

If you disagree with this proposal, then please provide your reason with supporting evidence in the box below.

4. If the proposal for a minimum list of dry recyclable materials to be collected for recycling were to be adopted and regularly reviewed, do you agree that the frequency of review should be every two years.

- Yes
- No
- Unsure

If no, please provide the reason for your response. Your response should include clear evidence as to what frequency of review would be more appropriate.

5. What, if any, other products or materials do you consider should be also included in the minimum list of materials to be collected by waste collectors from obligated businesses, public bodies, and other organisations? Please provide your response in the box below and clear evidence as to why the list should include the material(s).

We believe that paper cups should be collected alongside drinks cartons in the plastic bottle waste stream, as with the Welsh Business Waste Segregated Collection introduced in April of this year. Paper cups and drinks cartons can be effectively collected in the segregated Plastic Bottle waste stream, and jointly recycled. This could be reflected in Household collection to be consistent.

Proposal 15: Non-Household Municipal Waste – Flexible Plastic Packaging

Proposal 15: Flexible plastic packaging recycling from businesses and the NHM sector

1. Do you have any views on how plastic film should be collected from obligated businesses, public bodies, and other organisations?

- Collected as a separate stream from all other recyclables, and from residual waste i.e., in a dedicated bag or container,
- Collected in a container alongside other plastics – bottles, pot, tubs, and trays,
- Collected mixed with other dry recyclables in the same container,
- Other (please detail below and explain your reasoning for this proposal with supporting evidence)
- **Unsure**

If you select other, please detail and explain your reasoning for this proposal with supporting evidence

2. Collecting plastic films from all obligated businesses, public bodies and other organisations by the 31st March 2027 may be challenging. Using the list below please select those reasons which you believe will affect the ability to collect plastic film by this timeframe from businesses and NHM producing premises. Please provide evidence with justification, as appropriate. Not all rows need to be completed. Please use N/A where not applicable.

	Agree	Disagree	N/A
Collection and treatment contract limitations			X
MRF infrastructure and/or capacity	X		
Inability to resource and mobilise within the timeframe			X
Cost Burden to obligated businesses, public	X		

bodies, and other organisations			
Reprocessing availability	X		
End Market volatility/lack of end markets			X
Other – please detail			

Please provide evidence with justification why timescales should be extended, as appropriate. Or, if other, please describe.

Proposal 16: Non-Household Municipal Waste – Food Waste

Proposal 16: NHM food waste collections

1. Do you agree with our proposal that will require the separate collection of the food waste from all businesses and the wider NHM sector within 24 months of notification of a statutory requirement?

- Yes
- No
- **Unsure**

If you select no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.

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, agree - the Regulations should be extended to cover all obligated businesses, public bodies and other organisations, no matter of their size or nature. (If yes, go to Q7)**
- No, disagree – the Regulations should not be extended to cover all obligated businesses, public bodies or other organisations, no matter of their size or nature, some exemptions or phasing should apply.
- Unsure

3. If you disagreed, do you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations?

- Yes
- No (If No, go to Q5)
- **Unsure**

If you answer no, please explain why you have this view, supplying evidence to justify your opinion.

4. If you believe that exemptions to the Regulations should apply based on the amount of food waste produced by obligated businesses, public bodies, or other organisations, what parameter should be used to determine the de minimis amount? Please select from the list provided.

- 0-5kg of food waste per week
- **5kg+ food waste per week**
- Other

If you select other, please specify and provide evidence to support your proposal

5. If you disagreed, do you believe that exemptions or phasing should be applied to the amended Food Waste Regulations (Northern Ireland) 2015 for some obligated businesses, public bodies, and other organisations? Please select the option that most closely represents your view and provide evidence to support your comments.

- Option 1 - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be exempt from any requirement to segregate food waste from other waste streams
- Option 2 - All obligated small (businesses, public bodies and other organisations that employ between 10-50 FTEs) and micro-firms (businesses, public bodies and other organisations that employ up to 9 FTEs) should be given two additional years to comply with the new requirements (i.e., compliant 4 years post the legislative enactment)

Please provide evidence to support your selection.

If neither of the above options represents your view, please detail your view providing the reason for your response, and indicate if appropriate how long obligated businesses, public bodies, and other organisations, would require before they can segregate a core set of recyclables for recycling.

Micro Businesses (up to 20 FTE) should be exempt. These businesses should continue handling waste as they currently are. Any additional imposition in currently difficult economic climate would significantly impact upon their viability

SMEs (20+ FTE's) should be included after 2 years.

6. If you disagreed, do you believe that some obligated businesses, public bodies, or other organisations should not be required to segregate food waste for collection due to their nature, please detail the reason for this view, supplying evidence to justify your opinion.

Please detail the reason for this view, supplying evidence to justify your opinion.

N/A

7. To what extent do you agree that the measures we have proposed will increase the recycling of food waste from obligated businesses, public bodies, and other organisations? Please provide evidence to support your answer if possible.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- No opinion

8. Are there any further measures that you would like to see included over and above our proposals that would improve the recycling of food waste by obligated businesses, public bodies, and other organisations? Please provide supporting evidence for any proposed measures.

Please provide supporting evidence for any proposed measures.

N/A

Proposal 17: Non-Household Municipal Waste – Food Waste Treatment

Proposal 17: Anaerobic digestion as the preferred method of food waste treatment

1. We propose that anaerobic digestion is the preferred method for treating separately collected food waste, where suitable, but composting is also permitted. Do you agree with this view?

- Yes
- No
- **Unsure**

If you disagree, please explain why you have this view and provide supporting evidence.

Proposal 18: Non-Household Municipal Waste - Default Position

Proposal 18: Justifying why collections of dry recyclables from businesses and the NHM sector cannot be separated while ensuring good quality and positive environmental outcomes

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?

	Yes, agree	No, disagree	Unsure/ no opinion
Separate glass bottles and containers, for example including drinks bottles, condiment bottles, jars, etc.	X		
Separate Paper and card, for example including newspaper, cardboard packaging, writing paper, etc.	X		
Separate Plastics and metals, for example including drinks containers, detergent, shampoo and cleaning products, pots, tubs & trays, etc. Steel and aluminium tins and cans, including aerosols Drinks cartons (i.e., Tetrapak)	X		

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

We believe that paper cups should be collected alongside drinks cartons in the plastic bottle waste stream, as with the Welsh Business Waste Segregated Collection introduced in April of this year. Paper cups and drinks cartons can be effectively collected in the segregated Plastic Bottle waste stream, and jointly recycled. This could be reflected in Household collection to be consistent.

Proposal 19: Non-Household Municipal Waste - QualiTEE

Proposal 19: Details on the exceptions to the separate collection of dry recyclables (QualiTEE) from businesses and the NHM sector

1. Please detail examples of technical challenges, with supporting evidence, which you believe demonstrate that a separate collection of dry recyclables by waste collectors will not be feasible in circumstances for some or all NHM sector premises.

Please detail examples of technical challenges, with supporting evidence, which you believe demonstrate that a separate collection of dry recyclables by waste collectors will not be feasible in circumstances for some or all premises.

N/A

2. 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 evidence on the overall impact of the management of the NHM sector waste stream should be provided on the measures listed but not limited to the following:

	Yes, agree	No, disagree	Unsure
Quantities of materials collected	X		
Quantities of materials classed as contamination and not recycled	X		
Quantities of materials lost from sorting processes at a MRF	X		
Vehicle emissions from collection rounds	X		
Vehicle emissions from bulk transportation to sorting and reprocessing both in NI and overseas	X		
Emissions from disposal/ treatment including savings arising from landfill diversion	X		
Carbon savings from using recycled materials rather than virgin materials	X		
Other factor to be added – please describe below			

If you select disagree to any of the above, please provide information as to why you disagree, providing clear evidence. If other factors, please describe.

3. Do you agree that the following evidence factors should be provided by a waste carrier to demonstrate that NMH sector recyclable materials are of comparable quality?

	Yes	No	Unsure
Comparable quantities (+/-2%) of each material stream sent for closed loop recycling			X
Comparable quantities (+/- 5%) of each material stream sent for open loop recycling			X
Other factor to be added – please describe below			

If you disagree, please provide information as to why you disagree, providing clear evidence. If other factor, please describe.

4. Do you agree with the distance factor of more than 3 miles from another obligated NHM organisation, whereby collectors should not be required to collect recycling separately?

- Yes
- No
- **Unsure**

If no, your response should include evidence as to why the distance factor is not appropriate and if relevant, supply information on an alternative distance.

5. Do you agree that if the quantity of all core materials for collection is less than 3kg per week from one NHM organisation, then collectors should not be required to collect recycling separately?

- Yes
- No
- Unsure

If no, your response should include evidence as to why the quantity is not appropriate and if relevant, supply information on an alternative amount.

6. Which is your preferred option for collectors when requested to collect recycling where the distance to an obligated NHM organisation is above 3 miles or where the quantity of all core materials is less than 3kg per week? Please rank your preference where 1 is most preferred:

Mixed recycling collections

-- Please Select -- 1,2, or 3

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

-- Please Select -- 1,2, or 3

No recycling collections required, and a collector could direct organisations to alternative facilities

-- Please Select -- 1,2, or 3

If something else, please detail below.

7. Do you agree standard default values and data that have clearly referenced sources (that cover comparable Quality of materials, Environmental outcomes and Technical feasibility) which could be used to support a written assessment, would be useful?

- Yes
- No
- Unsure

If you disagree, please provide the reason for your response.

Proposal 20: Non-Household Municipal Waste - Written Assessments

Proposal 20: Written assessments from waste collectors for recycling collected from businesses and the NHM sector

1. Where waste collectors do not collect dry recyclable waste in the permitted three segregated streams, do you agree that the collector should produce a written assessment based on the template shown in Appendix 3 to outline the exception(s) to the requirement?

- Yes
- No – further content should be added to the template
- No – content should be removed from the template
- Unsure

If no, please provide the reason for your response below, including your suggested amendments to the template.

2. Do you agree that reference to standard default values and data that have clearly referenced sources, which could be used to support a written assessment, would be useful?

- Yes
- No
- **Unsure**

If you disagree, please provide the reason for your response with supporting evidence in the box below.

3. Do you agree that waste carriers for NHM recycling should be encouraged to have regard to the principle of QualiTEE (and not required to conduct a written assessment) during the first two years following the introduction of legislation requiring separate NHM recycling collections?

- Yes
- No
- **Unsure**

If no, please provide information as to why you disagree.

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

- Yes
- No
- **Unsure**

If you disagree, please select one of the following statements that best describes why:

- Revising written assessments every 2 years is too frequent (please state how frequently you think they should be revised and evidence why)
- Revising written assessments at least every 2 years is too infrequent (please state how frequently you think they should be revised and evidence why)
- Written assessments should be revised every time changes are made to the collection services delivered by the waste collector or the treatment facility, they use i.e., collection methodology utilised, access to a new recycling facility
- Other (please detail providing evidence to support your opinion)

5. Using a template to produce a written assessment and using standardised data should reduce the burden on waste collectors. What other ways to reduce the burden on waste collectors should we consider for the written QualiTEE assessment?

What other ways to reduce the burden on waste collectors should we consider for the written TEEP assessment?

N/A

6. Do you agree with the content of the written assessment template for collection of waste from obligated businesses, public bodies or other organisations as provided at Appendix 3?

- Yes
- No
- **Unsure**

If you disagree, please select any of the following that best describe why:

- Further content should be added (please comment)
- Content should be removed (please comment)
- Other (please comment)

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

N/A

8. We are proposing that a waste collector should only need to produce one written assessment for each set of premises or rurality that they intend to employ an exception for. For 'set of premises', we have suggested that this would include at a national level, groups of premises on a collection route or type of premises, for example hospitality premises. Do you agree with the examples listed for 'set of premises'?

- Yes
- No
- Unsure (please detail)

If you disagree, please select one of the following statements that best describes why:

- Other examples should be added to the list (please comment)
- Examples should be removed from the list (please comment)
- Other (please comment)

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.

N/A

Proposal 21: Non-Household Municipal Waste – Recycling Collections

Proposal 21: Establishing NHM service standards to improve recycling collections

1. Do you agree that the range of proposals set out by DAERA in this consultation once implemented, will sufficiently ensure that NHM recycling collections focus on segregating recyclable waste from residual waste alongside improving the quality and quantity of recycling?

- Yes
- No
- Unsure

If no, your response should include clear evidence as to why you have this.

Proposal 22: Non-Household Municipal Waste - Making Costs Manageable

Proposal 22: Reducing barriers to recycling for non-household municipal waste sector

1. What are the main barriers that obligated businesses (small and micro-firms in particular), public bodies and other organisations face when trying to recycle? Please select one option for each barrier listed.

	Major Barrier	Some Barrier	Little/No Barrier	No opinion
Financial	X			
Contractual	X			
Space		X		
Engagement			X	
Location		X		
Time and expense of staff training		X		
Enforcement	X			
Lack of awareness or understanding of how to recycle more waste			X	
Other				

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

2. Which type(s) of business support do you believe would be most useful for obligated businesses, public bodies, and other organisations to ensure they understand their obligations and enable them to recycle more of their waste? (Select any number of responses)

	Very useful	Useful	Neutral	Not useful	No opinion
1:1 support provided/offered to obligated businesses and organisations	X				
National, regional, or local communications campaigns	X				
National guidance and good practice case studies		X			
Dedicated website including online business support tools (e.g., online calculator and good practice guidance)		X			
Other					

If other, please specify

3. If adopted, and it became a legal requirement for those obligated businesses, public bodies, and other organisations to segregate a core list of dry recyclables for collection alongside food waste, how do you believe such regulatory change should be promoted or communicated?

Please tick all that apply

National, regional, and local communications campaigns i.e., TV adverts, social media campaigns, adverts in trade, national or local press, webinars	
Guidance and/or notification provided directly to all obligated businesses and organisations via the relevant regulatory bodies (local councils, NIEA) i.e., emails, written notification	X
Guidance and/or notification provided to obligated businesses and organisations via their existing waste or recycling collector	X
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	X
Other	

If other, please specify

4. Do you have any views on how Government should further support obligated businesses, public bodies, or other organisations to procure waste management services more collaboratively? Please select all the options which you think should be considered

- Promote existing collaborative opportunities relating to waste management so that obligated premises can access these easier
- Develop new procurement framework opportunities for waste management services that obligated premises can use collaboratively to gain best value
- Develop standard contract templates that groups of obligated premises 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

If other, please detail and provide examples if possible

Proposal 23: Non-Household Municipal Waste – Small and Micro Firms

Proposal 23: Arrangements for micro firms or small firms

1. Do you agree with our proposal that will require the separate collection of the core set of dry recyclables within 24 months of notification of a statutory requirement?

- Yes
- No
- Unsure

If no, your response should include clear evidence as to which materials you consider should not be incorporated within the list and why. Evidence with justification to extend timescales should be provided, if appropriate.

Small firms should be given 24 months

Micro Firms should be exempt

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? Please select the point in time which you think should apply.

	Yes	No	Unsure
24 months from notification of a statutory requirement			
3 to 4 years from notification of a statutory requirement			
More than 4 years from notification of statutory requirement			
Never			
Other – please detail	Small firms should be given 24 months Micro Firms should be exempt		

If you answer no, please provide the reason for your response with clear evidence detailing why small and micro firms need more time to accommodate the changes. If other, please detail.

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

- Yes
- No
- Unsure

Please provide evidence to support your view.

Micro Firms should be exempt

4. Some waste collectors may not be able to collect the required dry recyclable streams from all obligated businesses, public bodies and other organisations within the timeframe proposed. In this table we set out some circumstances which may delay changes to dry recycling collections. Please select the circumstances which you believe will create challenges and provide evidence with justification detailing why timescales should be extended, as appropriate. Not all rows need to be completed. Please use N/A where not applicable.

	Agree	Disagree	N/A
Collection and treatment contract limitations	X		
MRF infrastructure and/or capacity	X		
Container procurement and distribution challenges			X
Reprocessing availability	X		
End market volatility/lack of end markets	X		
Cost burdens to collectors of setting up new or expanded collection services	X		
Other – please detail			

Please provide evidence with justification why timescales should be extended, as appropriate. Or, if other, please describe.

Proposal 24: Non-Household Municipal Waste – Zoning and Franchising

Proposal 24: Waste franchising/zoning - to review collection zoning and franchising for businesses and NHM premises

1. Which recyclable waste streams do you believe should be included under a potential franchising/zoning scheme available for use by obligated businesses, public bodies, and other organisations? For each option, please select whether you agree, disagree, or are not sure/do not have an opinion/not applicable.

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

If other, please specify

2. Which of the below options, if any, is your preferred for zoning and/or collaborative procurement? Please select only one option that most closely aligns with your preference.

- Encouraging two neighbouring businesses to share the same containers under a contract.
- Encouraging businesses to use shared facilities at a site/estate or equivalent.
- Business Improvement Districts/partnerships tendering to offer a preferential rate (opt-in).
- **Co-collection – the contractor for household collection services also delivers the NHM service.**
- Framework zoning – shortlist of suppliers licensed to offer services in the zone.
- Material specific zoning – one contractor collects food waste, one dry recyclables, one residual waste.
- Exclusive service zoning – one contractor delivers the core recycling and residual collection waste services for the zone.
- None of the above.
- Other

If other, please detail:

3. Do you have any views on the roles of stakeholders in implementing a potential zoning/franchising scheme. Please select where you think the named stakeholder should have a role in each of the following activities:

	DAERA	NIEA	Councils	Business Improvement Districts	Environmental Non-Governmental Organisations Waste producers i.e., businesses, public bodies etc	Trade body, Umbrella Associations, Accredited bodies	Other
Procurement of services				X			
Scheme/collection service design	X	X	X	X			X
Admin and day to day management							
Enforcement (ensuring zoning rules are adhered to)	X	X	X	X			
Business support/advice				X	X	X	
Development of tools & guidance	X	X	X	X	X	X	
Delivery of communications campaigns	X	X	X	X	X	X	
Other activities							

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.

N/A

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

N/A

Proposal 25: Non-Household Municipal Waste - HWRCs and Commercial Bring Sites

Proposal 25: Options to provide NHM Waste Bring Sites and/or access to Household Waste Recycling Centres (HWRCs) for businesses and the wider NHM sector

1. Do you agree that obligated businesses, public bodies, and other organisations would find the provision of commercial waste bring sites useful to facilitate an increase in recycling?

- Yes
- No
- Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

2. Are there any barriers which we should be aware of, regarding the creation and operation of commercial waste bring sites?

	Please select all that apply
Lack of suitable location(s) to accommodate commercial waste bring sites	X
Access restrictions – time, availability, vehicular access, noise	
Risk of abuse which may cause recycling containers to fill up quickly	X
Risk of contamination to recyclables meaning collected materials are less likely to be recycled	X
Sites encourage fly-tipping or litter	X
Other	

If other, please specify

3. Do you agree that obligated businesses, public bodies, and other organisations should be permitted to use HWRCs to dispose of their waste or recyclables?

- Yes
- No
- Unsure

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

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)

	Please select all that apply
HWRC access will provide a trusted, legitimate disposal route for our waste and recyclables	X
HWRC access will provide a cost-effective disposal route for our waste and recyclables	X
HWRCs will provide access to disposal routes for our waste and recyclables at times which suit our organisation (in line with the opening hours of the facility)	X
HWRC access will enable us to recycle more of our waste due to the range of accepted materials	X
Other	

If other, please specify

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

	Please select all that apply
HWRC network has limited capacity for waste or recyclable storage - would be unable to accept predicted increase in volumes	X
Council(s) has/have insufficient resources to handle the anticipated increase in numbers of visits, waste volumes, payments or permits needed to cope with acceptance of commercial waste or recyclables	X
Existing Environmental Permit or planning condition for HWRC network would not permit a service expansion	
Other	

If other, please specify

Proposal 26: Non-Household Municipal Waste – Compliance

Proposal 26: Non-household municipal waste - compliance & enforcement

1. Do you agree that our proposal to extend Article 5 of the Waste & Contaminated Land (NI) Order 1997 will be sufficient to ensure compliance with the proposed requirements to segregate a core set of dry recyclables and food waste by obligated businesses, public bodies, and other organisations?

- Yes
- No
- Unsure

If you disagree, please explain why you have this view and provide supporting evidence.

2. Do you agree that the existing penalty of £300 for non-compliance for obligated businesses, public bodies and other organisations is severe enough to ensure compliance?

- Yes
- No
- Unsure

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

- £400
- £500
- £600
- £700

If you believe another value should apply to fixed penalty notices for non-compliance, please specify the value you feel the fixed penalty should be set at and explain why, as well as providing supporting evidence.

N/A