

**THE QUARRY PRODUCTS ASSOCIATION  
NORTHERN IRELAND**



**RESPONSE TO**

**Towards Resource Management  
A Consultation on Proposals for a New Waste  
Management Strategy**

**January 2006**

# **CONTENTS**

	<b>Page</b>
<b>Executive Summary</b>	<b>3</b>
<b>Comments on Consultation Paper</b>	
<b>Strand 1 Waste Prevention</b>	<b>4</b>
<b>Strand 2 Recycling and Recovery</b>	<b>8</b>
<b>Strand 3 Waste Planning</b>	<b>11</b>
<b>Strand 4 Data and Research</b>	<b>14</b>
<b>Strand 5 Legislation and Enforcement</b>	<b>15</b>
<b>Strand 6 Learning and Communication</b>	<b>16</b>
<b>Strand 7 Delivering the Strategy</b>	<b>18</b>
<b>Conclusion</b>	<b>18</b>

## **Executive Summary**

The Quarry Products Association NI ( QPANI) welcomes the opportunity to comment on the Consultation on Proposals for a New Waste Management Strategy for Northern Ireland. Founded in Northern Ireland in 1998 the Association now represents 95% of aggregate production in the Province. Our membership includes major, medium and smaller sized companies. The Association represents companies engaged in the supply of primary aggregates; the processing of recycled and secondary materials; the production of down stream processed products such as asphalt, lime, mortar, ready-mixed concrete, precast concrete and road surfacing contracting.

A number of QPANI members operate registered landfill sites and waste collection businesses and are therefore affected by the implementation of a new waste management strategy. QPANI members are committed to the objective of a sustainable Northern Ireland and many members are now actively involved in the production of aggregates from inert waste.

In May 2004 QPANI submitted a response to the Northern Ireland Affairs Committee inquiry into the implementation of the original Waste management Strategy in Northern Ireland. At that time we, along with many others, criticised the lack of leadership shown by Government in the strategy. We are still deeply concerned that Government will not meet its leadership obligations in implementing the new strategy and ensure that all Government Departments are fully aware of their joint responsibility for the successful implementation of the Strategy.

In our response within this document we make a number of recommendations including the need for the Waste Action Resource Programme to lead the way in coordinating the initiatives that will stem from the new strategy. To date there has been too many fragmented initiatives with no clearly defined objectives and outcomes. We also highlight the need for an all Ireland approach that will deliver economies of scale.

We welcome the proposal for the government to take a lead in promoting good waste management. Besides setting all parties a good example, green public procurement can stimulate emerging recycle markets to enable them to grow to obtain the required economies of scale to become competitive.

QPANI would like to see barriers to re-use and recycling removed, in particular those administrative burdens resulting from secondary materials being classified as wastes – the lifecycle approach refers to resources, not waste, and covers energy and materials, neither of which can be considered in isolation from the other

QPANI also call on Government Departments and local authorities to support and implement the Quality Protocol for the Production of Aggregates from

Inert Waste. This support will enable the Quarry industry to reprocess a major waste stream to assist in the delivery of sustainable construction within Northern Ireland.

QPANI strongly believes that better delivery of government services is essential, particularly as industry and the public in general will be paying much more for these services over the next few years – this is particularly relevant to the planning process

In their Waste Management Strategy inquiry conclusions the Northern Ireland Affairs Committee made 39 recommendations to Government. If the new strategy is to be successful it is imperative that those recommendations are implemented

## **Comments on Consultation Paper**

### **Strand 1 Waste Prevention**

**Section 1.1 Government Leadership in Waste Prevention** *A number of public sector mechanisms initiatives have been suggested to demonstrate enhanced Government Leadership in the prevention of waste.*

**Q1 Are there any other specific public sector initiatives that would help Government lead and guide all sectors in waste prevention?**

*A - There are too many fragmented initiatives at present. What is required is a smaller number of initiatives with clearly defined objectives and outcomes. We would further suggest that the Waste Resource Action Programme be at the core of future initiatives.*

**Section 1.2 New Developments to include a Site Waste Management Plan** *The Consultation Document sets out two options for the initial implementation of a Site Management Plan within new developments, which, subject to the necessary controls, can be extended more formally.*

**Q2a Which of the above options would be most effective in engaging the public and private sector to incorporate waste prevention and management into project planning and implementation?**

*A – Option 2*

**Q2b Are there other options that may prove more effective in engaging the public and private sector to incorporate waste prevention and management into project planning and implementation?**

*A – A waste management plan should accompany all Planning applications over a £50,000 monetary threshold*

**Q2c Is a monetary threshold level of £200,000 appropriate, and if not, what threshold should apply?**

*A – As per answer to 2b*

**Q2d Who should be responsible for monitoring and enforcement?**

*A – It is unclear how a mandatory system can be enforced. It is the QPANI impression that planning officers are not qualified in waste management practices and enforcement by them would become a valueless box ticking exercise. In fact it is what happens during construction that matters, not the previous paperwork. The issue is does the site comply with its own waste management plan. Only visitors to site could check on this, so perhaps the building inspector could be part of the enforcement. The QPANI would resist the imposition of more paperwork and mandatory requirements obeyed by responsible business and not enforced on rogue traders.*

*Third party audits such as provided by the international standard ISO 14001 should be a key driver in this area and this should be recognised, and rewarded, by government by ensuring that such sites are not subjected to even more regulatory requirements.*

*To help address those operators who blatantly abuse regulations and undermine existing legitimate operators the contract compliance model enshrined in the fair employment legislation could also be considered.*

### Section 1.3 Providing a Financial Incentive to Reduce Waste

*A number of European Countries have developed financial incentives such as “pay as you throw schemes” for municipal waste. In Northern Ireland at present however, local Councils do not have the legal powers to make a direct charge for collection of residual wastes from householders.*

**Q3 Should a Northern Ireland-wide incentive charging scheme be developed, or should local Councils be given the powers to develop their own incentive charging schemes?**

*A - If there is to be an incentive scheme then it should be on a Northern Ireland wide basis. Charging schemes can be difficult to operate and can lead to greater problems such as an increase in fly tipping. An incentive charging scheme would in effect be a penalty scheme, and would need a good infrastructure to work – there could be difficulties in some of the current smaller rural councils (though these will disappear by 2009 under the Review of Public Administration proposals). There could also be enforcement issues. If government is to progress down this route we would prefer to see a scheme introduced which incentivised positive, and sustainable, behaviour rather than just penalising, though we accept the polluter pays principle.*

### Section 1.4 Preventing Waste in the Business Sector

*The Framework for Waste Prevention identifies a number of specific initiatives, supported by Government, which promote the benefits of waste prevention within business sectors. A number of examples of these initiatives have been provided within the Consultation Document.*

**Q4a Do the above initiatives collectively provide sufficient drivers for waste prevention in the business sector over the next five years?**

*A – Yes*

**Q4b Can other organisations such as local councils and trade associations do more to provide advice and encourage waste prevention in business? If yes, please indicate what other specific initiatives Government should consider.**

*A – Yes. Government and local authorities can support the use of the quality protocol for the production of aggregates from inert wastes. QPANI favours more companies obtaining ISO14001, which is of course voluntary – and there are alternatives available such as the EU EMAS. Work is ongoing to make ISO 14001 more attractive to smaller companies, and we would support this.*

## **Section 1.5 Preventing Waste in the Home**

*The Framework for Waste Prevention proposes several actions, detailed in the Consultation Document, which could be carried out by all sectors to encourage the general public to participate in waste prevention.*

**Q5 What other specific initiatives should we prioritise to assist individuals, households and communities in preventing waste?**

*A – Consult with product producers to investigate ways to introduce more sustainable packaging. Education is key in this area as people are going to have to have a genuine desire to prevent waste. So primary schools should be targeted and visits arranged for pupils to landfill sites, for example, to show them what happens to their waste*

### **Waste Prevention Targets**

*Government are at present giving consideration to the setting of waste prevention targets for specific industries and waste streams in order to control future waste growth.*

**Q6a Do you think that specific targets should be introduced to encourage waste prevention?**

*A – To early to set targets*

**Q6b If so, what areas should be covered and what quantitative measures should be applied to best support delivery of our objectives for reducing waste and improving resource efficiency?**

*A – No Comment*

## STRAND 2 RECYCLING AND RECOVERY

### Enabling Participation

*A number of measures have been highlighted, aimed at encouraging and enabling separate collection of materials for recycling and composting.*

#### **Q7a Which proposals (sections 2.1-2.5) would be most effective in encouraging businesses and the public to participate in recycling?**

##### ***A – 2.3 Assisting small businesses.***

*Many businesses producing commercial waste wish to recycle, but the amount of waste they generate is too small to be of interest to commercial collectors. WRAP is currently funding a pilot for waste collection from Small & Medium Sized Enterprises, the results of which will inform the development of appropriate agreements to assist this objective. The Department considers that District Councils should encourage small businesses to participate by accepting their commercial & industrial waste for recycling at a minimum of one civic amenity site per Council area. A reasonable charge should be made in return for the use of such facilities*

##### ***and 2.5 Providing technical support and advice.***

*District Councils play a key role in encouraging local businesses and the public to recycle and compost their waste. Through membership of WRAP, the Department will provide technical support and advice to assist District Councils in the provision of improved services to householders and local businesses on kerbside collection, home composting, communication tools, training and procurement. We are also reviewing the role of the voluntary sector to identify its capacity to support the delivery of Strategy objectives. Financial assistance for projects that encourage household, community and business participation in waste recycling and recovery is available through our Community Waste Innovation Fund (see also section 1.5).*

##### **Comment**

*Recycling cannot be effective without the provision of suitable facilities at a convenient distance from the site of waste production. Often there are barriers to recycling such as the administrative costs of licensing, exemptions, registration etc arising from too wide an interpretation of the definition of waste and uncertainty about when waste ceases to be waste. These costs should be addressed. It is understood that the recently published European thematic strategy addresses the issue of when waste ceases to be waste.*

**Q7c Should statutory requirements (as detailed in 2.2 and 2.3) be imposed on local Councils to ensure adequate provision of services to enable all sectors to participate in recycling?**

*A – Yes*

**Q7d Do you agree that new powers (as detailed in 2.4) should be available to local Councils to assist the use of financial incentives?**

*A – Yes*

### **Sustainable Procurement**

*It is intended that Government commitment to recycling and recovery will be strengthened by developing specific procurement policies and practices that encourage sustainable purchasing. A number of specific proposals or initiatives for achieving sustainable procurement within Government Bodies have been identified within the Consultation document*

**Q8 How might equivalent initiatives (detailed in Section 2.6-2.8) be rolled out across other sectors?**

*A – Apply same planning principles as per question 2b. Market development for recylates requires a series of processes. First, the use for the product must be identified. This can be supported by research funding. Secondly, demonstration of fitness for purpose must occur. Thirdly, specifications need to be developed for the product. Finally the market needs to grow to achieve the economies of scale necessary to become competitive. Green public procurement can greatly assist this last stage of market development.*

*Much more could be done in relation to the recycling of construction waste, through the use of protocols, such as the WRAP protocol on secondary aggregates. There is generally too great an emphasis in the document on municipal waste, because of the EU fines which can be levied in this area. Currently procurement budget holders gain no benefit from recycling – spending departments will have to be rewarded in some way.*

### **Developing a Recycling Economy for all Waste Streams**

*From 2005, it is proposed that membership of WRAP will be extended to participate fully in UK market development initiatives and new materials programmes in order to assist Northern Ireland to build processing capacity and develop viable end markets for recycled and recovered materials.*

**Q9 What further programmes should the Department consider with WRAP as a focus for co-ordinated support to the business sector and local Councils on market development?**

*A – No further programmes at present. Proposed programmes cover large proportion of available recyclables.*

**Recycling and Recovery Targets**

*A number of recycling and recovery targets have been proposed for municipal waste, commercial and industrial waste and construction, demolition & excavation waste, based on the framework set out in the Northern Ireland BPEO.*

**Q10a Do you consider these additional targets are necessary to support statutory targets for landfill diversion and producer responsibility, and if so, should these be made statutory?**

*A – For business recycling the QPANI believes that it is necessary to obtain firm waste production data and evidence of the trends in these data before trying to set targets. It would also be useful if benchmarks could be identified to ensure that Northern Ireland targets are both challenging and realistic.*

**Q10b If not, what other targets or voluntary practices should be adopted?**

*A – N/A*

*Individual targets for specific waste streams will be set through public and private sector Waste Management Action Plans. An option is to set minimum targets across the public and/or private sector to guide the development of these Plans.*

**Q11a Should minimum targets for waste recovery be set for public sector organisations?**

*A – As per question 10*

**Q11b Should minimum targets for waste recovery be set for private sector organisations?**

*A – Yes but maybe difficult to implement and monitor. As per question 10*

**Q11c If so, would a target of 5% recovery per annum, based on detailed analysis of an organisation's waste arisings be a reasonable aim?**

*A – As per question 10*

**Q11d If not, what other targets or guidelines might support delivery of our recycling and recovery objectives?**

*A – N/A*

## **STRAND 3 WASTE PLANNING**

### **Section 3.2 Obtaining Planning Permission for Waste Infrastructure Facilities**

*Planning Service is currently undergoing a comprehensive review, through its Modernising Planning Processes Programme. Within this, Planning Service has identified a number of areas in which processing of planning applications can be improved without compromising the integrity of the Planning Process.*

**Q12a Do you agree with Planning Service initiatives to improve the planning process?**

*A – Yes, However there is a lack of decision making in the Planning Service, as well as a lack of facilities. Waste is an emotive subject, but what is needed are local regional plans earmarking sites which should be speeded through the planning process. There is a huge gap in infrastructure as well as in the education of planners, and more joined-up thinking and looking ahead is also necessary.*

**Q12b Are there any additional steps we should address in relation to waste planning? If so, what are these?**

*A – We would propose that time limits or targets be set for all consultees to the planning process. In addition Planning Service should adhere to their time restrictions when dealing with third party consultee queries. Planning Service should only ask applicants to provide additional information etc in response to queries or objections from Consultees which are based on material considerations.*

### **Section 3.3 Waste Infrastructure Task Force**

*In April 2005, a Waste Infrastructure Task Force was established to examine the complex and inter-related issues surrounding the procurement of waste facilities.*

**Q13 Are there any additional issues which the Task Force should consider in relation to waste infrastructure?**

*A – Consultation with and involvement of the Waste Management Industry.*

### **Section 3.4 Structural Arrangements and Options**

*The Task Force will examine the fitness for purpose of the current structural arrangements for procuring waste infrastructure, options for short term change to existing structural arrangements and what changes, if any, to existing arrangements may be necessary in the long term. A number of structural options are being considered.*

**Q14a We would welcome your views on which of the above structural options would provide the most effective means of dealing with waste in Northern Ireland?**

*A - Option 3: This option proposes the establishment of a single waste management authority for the whole of Northern Ireland, with responsibility for waste planning, waste disposal and waste collection. This single authority would have responsibility for all waste management operations and targets, including powers of direction as to where and how waste should be presented for disposal. In this instance, District Councils would retain no waste functions. This option carries the risk of losing local experience and distancing local populations from identity with waste issues and responsibility for their resolution. However, a clear advantage of establishing this type of structure is that it would have sole statutory responsibility for waste disposal as well as the powers necessary to meet disposal targets, and would be held accountable for performance against these targets. It would have the capacity to act in the best interests of Northern Ireland as a whole, and to provide greater clarity regarding central Government funding and other funding options. As with option 2, the introduction of legislation to establish a single authority would take time, and we would wish to implement any new structural changes in tandem with wider structural initiatives, including the Review of Public Administration.*

**Q14b Are there any additional options we should consider?**

*A – All Ireland approach should be encouraged in order to deliver economies of scale.*

### **Section 3.5 – Assessing the Infrastructure Requirements**

*The Northern Ireland BPEO provides a baseline for combining a number of waste technologies with recycling and composting in order to meet the EU Landfill Directive targets.*

**Q15a Do you consider that the above mix of treatment facilities will enable Northern Ireland to meet its Landfill Directive targets?**

*A – Not sure. Effective decision making and communication is required.*

**Q15b Do you agree that energy from waste will be an essential component of the infrastructure mix required to meet Northern Ireland’s Landfill Directive’s targets? If not, what mix of infrastructure would you recommend?**

*A – Yes*

### **Section 3.7 Programme Delivery Support Unit**

*A Programme Delivery Support Unit will be set up to deliver recommendations on potential funding and contract options and aid the procurement of major infrastructure.*

**Q16a Would you support the establishment of a Programme Delivery Support Unit as a mechanism for taking forward major waste infrastructure procurement?**

*A – Yes. We would ask for more detail on how this Programme Delivery Support Unit fits in with the Options outlined in Section 3.4 for a single waste disposal/management authority. Would this be an interim body or continue to exist if Options 2 or 3 went ahead?*

**Q16b Have we identified all the key issues which the Programme Delivery Support Unit should be addressing?**

*A – Yes. Key issues identified are comprehensive.*

### **Section 3.8 Energy from Waste**

*The Northern Ireland BPEO recommends an integrated network of facilities for Northern Ireland which includes at least 10% energy from waste by 2020. Proposals for the development of these facilities will set out measures to maximise energy recovery whilst also ensuring that complementary targets for recycling and composting are met.*

**Q17 Do you consider that these actions will enable us to address Northern Ireland's infrastructure deficit?**

*A – Members have grave doubts as to whether the Programme Delivery Unit etc will enable EHS to address NI's infrastructure deficit. There are major concerns around the ability of the planning system in Northern Ireland to help deliver the necessary infrastructure.*

## **STRAND 4 DATA AND RESEARCH**

### **Section 4.1 Improving our Waste Data Systems**

**Q18a Do you agree that mandatory reporting is required to underpin accurate data collection and interpretation for non-municipal wastes?**

*A – Reporting should be mandatory and commensurate in scale but also checked for accuracy and quality. Consultation with the relevant trade associations would be useful in this respect.*

*Excessive administrative burdens should not be placed on business, particularly SMEs, for whom the burden will be even greater, to obtain the necessary data. The QPANI supports the involvement of NI in the UK waste data strategy. Mandatory initiatives should be avoided as far as possible, and standard indicators, as already used by multinational companies, should be considered for use.*

*The key issue here is to build on the current data being collected and not to impose additional bureaucratic procedures on business.*

**Q18b If not, what other voluntary and mandatory measures, singly or in combination, would improve data collection for all waste streams?**

*A – N/A*

### **Section 4.2 Promoting Research, Development and Demonstration Projects**

*Participation in research, development and demonstration initiatives and projects provides a co-ordinated and cost effective approach to delivering practical and innovative solutions to Northern Ireland's waste management issues.*

**Q19 We would welcome views on the overall approach to provide a coordinated research and development programme that meets Northern Ireland's needs and delivers best value.**

*A – Greater involvement of Universities etc in conjunction with waste management companies*

## **STRAND 5 LEGISLATION AND ENFORCEMENT**

**Q20a The Strategy aims to provide an effective legislative framework for waste management in Northern Ireland. In general do you consider that the proposed framework is sufficient?**

*A - The legal framework needs to be adequately resourced and effectively enforced, with a dedicated decision maker in terms of legal action within the system – QPANI would seriously question whether the enforcement and prosecution policy of EHS is currently providing a comprehensive and robust framework for regulation appropriate for N.*

**Q20b If not, where would you like to see greater emphasis placed?**

*A – fly-tipping has a negative impact on legitimate businesses. The QPANI believes that rogue businesses should receive deterrent sentences.*

### **Section 5.4 Prevention of Illegal Dumping**

*The legislative powers available to Government and local Councils are not currently sufficient to deal with the growing problem of illegal dumping in Northern Ireland. In response to this a consultation paper detailing proposed amendments to the Waste and Contaminated Land (NI) Order 1997 has been published. Stakeholders should respond to this Consultation Paper separately.*

### **Section 5.5 Additional Powers/Changes to Legislation**

*A number of the proposals set out in the Consultation Paper will require further changes to the existing body of waste management legislation. Depending on the outcome of consultation, these may include measures to encourage the reduction, reuse and recycling of waste as well as facilitate the provision of waste management infrastructure.*

**Q21a Do you believe that the measures identified through future changes in legislation will have a positive effect on the way in which all waste streams are managed in Northern Ireland?**

*A – Commonsense legislation is required in this area, and the interpretation of waste is key – is this a product which goes through a process. The current definition of recovered oil is an example of where Government is not adopting the common sense approach. This will potentially lead to serious environmental damage.*

**Q21b In your opinion, will the potential measures identified be acceptable to stakeholders and be feasible for implementation “on the ground”?**

*A - Yes*

## **STRAND 6 LEARNING AND COMMUNICATION**

### **Section 6.1 A New Programme for Public and Business Engagement**

*This new programme will continue to reinforce the Reduce, Reuse, Recycle messages and will also highlight new issues and priorities as implementation progresses. A number of proposals have been set out within the Consultation Document to achieve this.*

**Q22a Do you agree that there is a continuing need for national campaigns to encourage everyone to deal with their waste more responsibly?**

*A - Yes*

**Q22b What aspects should the next phase of the Government awareness programme address to provide the most effective support to District Councils, business and the voluntary sector in communicating the Strategy?**

*A – There is a need to re-educate from basics. This might be done through advertising and education initiatives within schools.*

**Q22c What specific initiatives might be incorporated into the Government programme to encourage everyone to deal with their waste more responsibly?**

*A – Waste issues should be part of the curriculum from primary school up.*

### **Section 6.3 Developing Best Practice Guidance for the Public Sector, Business and Communities**

*In partnership with local Government and the voluntary sector, we will develop guidance, fact sheets and educational resources to ensure the provision of consistent and appropriate information on waste management issues.*

**Q23a Should Government or other relevant organisations do more to raise awareness of waste issues amongst businesses?**

*A – Yes, If business is committed to the ISO 14001 route (as referred to above) this should reduce the regulatory burden and government should do more to recognise such a commitment.*

**Q23b What initiatives are most relevant for industry?**

*A – Re-educate and train from basics. There is also a need to simplify the law.*

### **Section 6.4 Supporting the Delivery of Waste Education and Training**

*The promotion of best practice in waste management will be encouraged through establishment of an overarching framework for waste education as well as the development of partnerships with professional bodies, trade associations and business support organisations.*

**Q24 What should Government's priorities be in developing education and skills initiatives for waste and resource management?**

*A – Develop and implement NI specific based training programmes. Introduce third level educational qualifications and begin awareness and education from primary school level.*

## STRAND 7: DELIVERING THE STRATEGY

**Q25 Do you consider that the proposed Strategic Waste Board will provide significant and effective monitoring of progress on all areas of the Strategy? Do you believe that there are any alternative structures that would prove to be more effective in fulfilling a monitoring role?**

*A – Yes, but the Board needs strong leadership. There also needs to specific enforcement targets for the Department.*

### **Conclusion**

Finally, QPA would again reiterate its previous stated position that strong overall leadership is required by Government in order that Northern Ireland meets EU targets and realises the new strategy's vision. In order to achieve this QPANI would recommend that the Minister for the Environment should adopt the role of "waste Champion" in Government to ensure that all Departments, public bodies and all other stakeholders play their full part.

Signed



Seamus McKeague  
Chairman QPANI