

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

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Via email

8th October 2010

Mr Clifford Maxwell
Department of the Environment (NI)
Landfill and Producer Responsibility
Climate and Waste Division
Central Policy and Resources Group
20-24 Donegall Street
BELFAST
BT1 2GP

Dear Clifford,

CONSULTATION PAPER ON THE INTRODUCTION OF RESTRICTIONS ON THE LANDFILLING OF CERTAIN WASTES

The Council for Nature Conservation and the Countryside welcomes the opportunity to comment on this consultation paper. Much of the technical detail is outside of our remit, and we are therefore unable to give answers to the Questions posed on page 47 for each of the waste types listed in Chapter 6. We do, however, have some general observations to make:-

- CNCC would support the conclusion reached in Para 6.59, that there is a reasonable case for considering landfill restrictions on biodegradable wastes and metals. We would further support the addition of glass to this list, taking into account the point made in Para 6.61, since the costs of implementation and enforcement would be spread across all three categories of waste. The public are already largely used to the concept of recycling all these materials, either through 'Blue Bins' or local authority recycling sites in public places. Facilities are already in place for collection and for recycling for paper/card, textiles, metals and glass, which should make the restrictions relatively easy to apply.
- Food, green waste and wood present some challenges in terms of sorting, collecting and disposal, with further infrastructure development required. However there is now a range of well established technologies available to do this, and work is required to put these into practice. These would include composting (both at domestic and local authority level), anaerobic digestion, and combined heat and power generation from combustion. In addition there are some new developments which should be investigated, such as Sequence Batch Reactors, where waste is subjected to alternating anaerobic and aerobic digestion processes.
- Landfill bans should be accompanied by a requirement to sort. This is part of the 'polluter pays' principle, with the cost paid in terms of the time and effort required to sort waste before it is removed. The recent report on sorting, however, shows that this needs to be better organised, with better separation of the various categories of waste to avoid further costs and risks to those processing waste for recycling etc. The danger of poor separation and sorting is that it could lead to increases in amounts of waste sent to landfill.

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- There needs to be encouragement and education for all producers of biodegradable waste to reduce the amount that requires to be collected, sorted and processed. The WRAP campaign 'Love food, hate waste' is a good start to this process, but needs to be adopted more widely, and followed up with more information and assistance. There is huge scope for dealing with this waste through domestic composting which should be strongly encouraged. Local authority composting is becoming more common but needs to be extended and expanded. Anaerobic digestion provides an option for large amounts of industrial waste from the food industry, as well as for much of the green waste from gardens etc. Without the development of these alternatives the landfill restrictions will not be effective.
- CNCC is pleased to see that this consultation is being considered in parallel to the closely related topic of Meeting EU Landfill Diversion Targets. We are also responding to that consultation, but many of the issues are the same.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Patrick Casement', written in a cursive style.

**PATRICK CASEMENT
CHAIRMAN**