

Consultation Response

Waste Action Plan for a Circular Economy

Department of Communications,
Climate Action and Environment



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Introduction

Natural World Products Ltd (NWP) is the largest recycler of organic waste streams on the island of Ireland, currently managing 285,000 tonnes per annum.

In our capacity as the most experienced Irish operator recycling organic waste, we welcome this opportunity to convey our views on the Waste Action Plan for a Circular Economy, with a particular focus on experiences within Northern Ireland over recent years during which recycling rates have soared.

Operating from state-of-the-art In-Vessel Composting and Recycling Facilities on the outskirts of Belfast and in Keady, Co Armagh, we also operate waste transfer facilities in Antrim and Drumanakelly, Co Down.

Counting each council authority in Northern Ireland as a customer, in addition to some of the larger waste management companies in the Republic of Ireland, we also serve the wider agricultural and horticultural sectors, providing high-quality organic compost created through the specialist processing and recycling of food and garden waste streams collected from households.

This document outlines our responses to a select number of consultation questions. For ease of understanding, we have also included a summary of our key points below.

Summary of key points

The key points contained within this response from Natural World Products are:

- The provision of brown bins and kitchen food caddies to every household in the country should be made mandatory
- A mechanism to encourage both waste producers and private collectors to take responsibility for ensuring the quality of organic waste streams (in terms of ensuring minimum levels of contamination by non-organic materials) should be introduced
- Education programmes to encourage the correct recycling practices for household food and garden waste should focus on the potential benefits for Soil Health and **the Carbon Sequestration impact** of properly produced organic compost
- New independently audited and certified national standards governing the quality of compost (and digestate), similar to those operating in the United Kingdom, should be introduced
- Greater research into the benefits for Soil Health and Carbon Sequestration – and how these objectives can be advanced through the effective recycling of household food and garden waste– should be undertaken

Responses to select consultation questions

3.7 Consultation Questions – Municipal Waste

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

Natural World Products response

With municipal recycling rates in Northern Ireland reaching a record high of 50% in 2019¹, there are lessons to be learned from the municipal waste collection experience in Northern Ireland – where NWP is responsible for more than 47% of all household recycling from Local Authority Collected Municipal Waste (LACMW).

We welcome that the provision of organic waste bins to households is to be made mandatory and recommend that consideration should also be given to the compulsory provision of kitchen food caddies to assist householders in their efforts to recycle food waste.

Should kitchen caddies be made mandatory – which is strongly encouraged – these should be accompanied with the supply of ample numbers of compostable bags (liners) without householders being required to actively purchase. According to our experience in Northern Ireland, the provision of compostable liners for kitchen caddies (to be placed in the brown bin once filled) has a significant impact in increasing the recycling yield for food waste tonnages as it makes the process cleaner and easier for the householder in their kitchen.

The comingling of garden and food waste should also be actively encouraged. In Northern Ireland, council areas which collect food and garden waste on a comingled basis (i.e. together in the brown bin) realise overall organic recycling yields that are 4-5 times higher than those council areas that collect food waste separately from garden waste.

In addition, due to the relatively low tonnage yields when food waste is collected on its own, the separate collection of food waste becomes extremely expensive for collectors and the resultant costs (either to be incurred by them or passed on to householders) could have a negative impact on the desire to maximise the level of organics to be made available for recycling.

To further reduce the risk of organic waste being disposed of in black bins and, in particular, contamination of source segregated organic waste streams, mechanisms or a system of checks that ensure contamination in the organic waste stream (brown bin) is kept to a minimum must be considered.

Ensuring that householders and waste collectors (those best placed to manage this aspect from the beginning of the process) are held responsible and accountable in some way for this aspect will be an important element in ensuring successful and sustainable outcomes.

¹ Northern Ireland local authority collected municipal waste management statistics July to September 2019 quarterly report

In Northern Ireland, this element is managed and controlled very successfully by Local Authorities (who collect the waste but also actively seek to manage non-compliant households). Given the fact that collection is not controlled by public authorities in the Republic of Ireland, leaving this element entirely to market economics will not, in our view, work as effectively and it is highly likely an element of regulatory enforcement will be needed.

Reducing contamination levels in organic waste streams is a critical element in seeking to produce the highest quality compost or digestate required to complete the circular economy.

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4.7 Consultation Questions – Food Waste

What are the underlying causes of food waste in Ireland?

Natural World Products response

There is a lack of education around the benefits, both environmental and economic, of effective food waste recycling and its potential to fuel a genuinely local circular economy.

In Northern Ireland, an understanding that food waste collected by the municipal authority flows back into that council area through the provision of high quality peat-free organic compost (e.g. to parks, greenways, men's sheds, allotments, golf courses etc) has a significant influence on recycling rates.

Education or PR campaigns around food waste should include a focus on how organic compost produced from food waste can contribute to Soil Health through returning organic matter to heavily farmed soils and, now more than ever, the Carbon Sequestration benefits of organic compost. Soils are the second biggest store of carbon available to us after the oceans.

For example, food waste, when converted to high quality organic compost can positively contribute to key environmental challenges faced by Ireland through:

- Locking carbon up in soils;
- Returning organic matter to soils that have been heavily farmed over many years, thereby stripping them of their natural nutrient base

Similarly, education programmes could illustrate how the prosperity of the agri-food sector can be improved through the application of organic compost produced from food wastes by:

- Helping to replenish vital nutrients and organic matter lost through the ravages of historically intensive farming practices
- Significantly improving crop yields and workability
- Achieving further financial savings for farmers by reducing the amount of lime, synthetic and chemical fertilisers added to soil

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

Natural World Products response

Food waste collections have been mandatory in Northern Ireland from April 2017 which immediately contributed to a 5-percentage point increase in composting and recycling rates between Q4 2016 and Q4 2017¹.

The Northern Ireland experience, particularly over the most recent three years, should therefore be examined closely and NWP is willing to play its full part as a key leader on the island in this area in any requested engagement.

A key difference between the United Kingdom and the Republic of Ireland is the existence of national compost and digestate quality standards, independently certified and audited.

The Compost Quality Protocol (properly managed and enforced) and PAS100 (Publicly Available Specification for Composted Materials) have been absolutely critical to raising the standard of organic compost being produced in Northern Ireland.

More importantly, once that product starts to flow back out into communities and amenities, it helps instil a high degree of confidence and interest from the general public in how to use their household waste receptacles most effectively.

The introduction of similar certification in the Republic of Ireland along with a greater focus on seeking to reduce contamination levels in household brown bin collections could, we believe, result in a sea change in compliance, greatly increasing feedstocks for organic compost producers and enhancing the quality of the end product.

¹ Food waste 'boost' to Northern Ireland's recycling rate

7.7 Consultation Questions – Circular Economy

What are the areas with greatest potential for transformation in Ireland under the Circular Economy?

Natural World Products response

The collection of organic waste to be processed and converted into high-quality peat-free organic compost has the potential to be hugely transformative and perfectly exemplify the circular economy.

What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors?

Natural World Products response

Educational and PR campaigns informing householders on how food and garden waste can be used to fuel the circular economy and reduce carbon emissions through subsequent Carbon Sequestration in soils is imperative to win their buy-in.

Undertaking practices that encourage the appropriate disposal of organic waste combined with increased awareness of its connection to the circular economy will contribute to this.

For example, highlighting that one tonne of organic compost applied to soil keeps the equivalent of 375kgs of CO₂ out of the atmosphere – and that figure is closer to 900kgs when it is used as a replacement for peat (often the case in Ireland) – can greatly increase awareness, by playing into the public consciousness around climate change and the need to reduce carbon emissions.

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

Natural World Products response

We very much welcome the establishment of a Waste Action Plan for a Circular Economy Advisory and Implementation Group.

However, this should incorporate meaningful consultation with private firms, particularly where they are drawing on best practice from other jurisdictions such as Northern Ireland. NWP stands willing to play our full part in lending our highly significant NI experience to any such group.

18.6 Consultation Questions – Research & Innovation

What are the research areas you would consider to be important in developing a circular economy?

Natural World Products response

As soil is the second largest carbon store behind the oceans, greater research into Soil Health and the carbon sequestration benefits of organic compost made from household food and garden waste to combatting climate change, is exceptionally important.

Further research carried out in collaboration between academia, compost producers and farming/horticultural groups into the benefits of long-term sustainable soil management practices and how organic fertilisers can add economic as well as environmental benefit to our growing sectors would be worthwhile.

Existing research, and our own experience, supports the claims that the application of high-quality organic compost:

- Locks carbon in the soil
- Greatly increases agricultural yields
- Improves workability of the soil
- Provides further financial benefits by reducing spending on chemical and synthetic fertilisers