

Daera Consultation on Rethinking Our resources: Measures for Climate Action and a Circular Economy in NI

Proposal 2: To require local Councils to collect a core set of dry recyclables from households to help avoid confusion and improve consistency and the quality of recyclable material.

1. Do you agree that the core set of materials comprising dry recycling collections by councils should comprise as the list below, as a minimum?

	Agree. All items listed in the row should be included.	Disagree. All items listed in the row should not be included. Please state which ones and why.	Unsure
Paper and card, including newspaper, cardboard packaging, writing paper etc.	X		
Glass bottles and jars - including drinks bottles, condiment bottles, jars, etc. and their metal lids.	X		
Metal packaging: 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		

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

- Yes
- No - 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.
- Unsure

The Cosmetic Toiletry and Perfumery Association Limited

The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024 is expected to enter into force by 1 January 2025. According to this Regulation, from 1 April 2027, primary and shipment packaging must be labelled “Recycle” or “Do Not Recycle”, based on a prescribed Recyclability Assessment Methodology (RAM). The RAM will be utilised for packaging sold throughout the UK, therefore, it is essential that household recycling collections across all four Devolved Nations are consistent, to ensure that all packaging labelled “Recycle” is in fact collected and recycled. If packaging is labelled “Recycle” but households are advised by their local Council that certain materials are not collected for recycling, it will cause consumer confusion and likely lead to distrust in the recycling system. Likewise, if consumers place packaging in the recycling bin expecting it to be recycled, but it is subsequently diverted to landfill or incineration, this would deem the label misleading.

- Some Councils may not be able to collect the core set of dry recyclables by the date proposed. In the table below we set out some circumstances which may delay changes to recycling collections. Please provide evidence with justification why timescales should be extended, as appropriate.

Not all rows need to be completed. Please use N/A where not applicable.	
Contracts for dry recyclable collection.	
Sorting or reprocessing.	
Procurement processes for new containers or vehicles.	
Manufacturing capacity for new containers or vehicles.	
MRF infrastructure or capacity.	
Container distribution	
End Market volatility/lack of end markets.	
Other - please describe.	Whilst there may be challenges when implementing changes to waste collections, as highlighted in response to Q.2, it is essential that all packaging that is deemed recyclable by the RAM is collected by local Councils across the UK for recycling. Failing to do so would be misleading to consumers.

Proposal 3: That additional materials are added to the core set over time when feasible, with flexible plastic packaging set to be collected from households by the end of the financial year 2026/2027.

- Collecting plastic films by 31 March 2027 may be challenging for some Councils. In this table we set out some circumstances which could affect a Council’s ability to collect plastic film by this date. Please provide evidence with justification detailing why this timescale will be challenging.

Not all rows need to be completed. Please use N/A where not applicable.

Contracts for plastic film collection.	
Sorting or reprocessing.	
Procurement processes for new containers or vehicles.	
Manufacturing capacity for new containers or vehicles.	
MRF infrastructure or capacity.	
Container distribution	
End Market volatility/lack of end markets.	
Factors relevant to collections from flats and houses in multiple occupation, where citizens share communal containers.	
Other - please describe.	Whilst there may be challenges when implementing changes to waste collections, as highlighted in response to Proposal 2, it is essential that all packaging that is deemed recyclable by the RAM is collected by local Councils across the UK for recycling. Failing to collect plastic films and flexibles by 31 March 2027, would mean that packaging that is made from those materials and labelled "Recycle" would be misleading.

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

- Yes
- No
- Unsure

To ensure a successful transition to a circular economy, it is important that waste collection, sorting, and reprocessing facilities are improved. Therefore, as UK Extended Producer Responsibility (EPR) progresses, and investments in infrastructure take shape, CTPA would support Daera and the Devolved Administrations working together to expand the list of materials collected from households for recycling.

5. What, if any products or materials do you consider should be also included in the core list of materials to be collected by councils? Please provide your response in the box below as to why the list should include the material(s).

To comply with upcoming labelling requirements, it is essential that household recycling collections are harmonised across the UK, and all packaging deemed recyclable by the RAM must be collected and recycled in practice. In the [Government Response](#) to the 2021 consultation on Consistency in Household and Business Recycling in England, the Department for Environment, Food and Rural Affairs (Defra) outlined the materials that will be required to be collected from households and businesses with accompanying deadlines.

The vision for UK EPR is “A world class packaging system across the UK, which creates resource efficiency through a circular economy, resulting in minimal environmental impacts, alignment to net zero, and environmental goals.” In order to achieve “a world class packaging system”, recycling must be continually improved, and where possible, the list of materials collected for recycling should be expanded.

Proposal 14: Businesses and the wider non-household municipal (NHM) sector will be required to segregate from residual waste a core set of dry recyclables, to improve recycling behaviour and activity and ensure consistency between what people can recycle at home, at school and at work.

1. Do you agree with the contents of the list below, detailing the materials that should be included in the core set of recyclable streams collected separately from businesses and NHM producing premises 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. Please state which ones and why.	Unsure
Paper and card, including newspaper, cardboard packaging, writing paper etc.	X		
Glass bottles and jars - including drinks bottles, condiment bottles, jars, etc. and their metal lids.	X		
Metal packaging: 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		

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).

The vision for UK EPR is “A world class packaging system across the UK, which creates resource efficiency through a circular economy, resulting in minimal environmental impacts, alignment to net zero, and environmental goals.” In order to achieve “a world class packaging system”, recycling must be improved, and where possible, the list of materials collected for recycling should be expanded.

The more consistency across the UK between household and business waste collections, the higher the volume of material collected and the better the quality of material output will be achieved. All four Devolved Nations must work together to ensure that materials collected are consistent across both businesses and households. In its [Government Response](#) to the 2021 consultation on Consistency in Household and Business Recycling in England, Defra outlined the materials that will be required to be collected from businesses and households with accompanying deadlines.

Proposal 15: Subject to the costs being covered by packaging EPR (pEPR) and confirmation that the material can reasonably be collected for recycling, additional materials will be added to the core set over time, with businesses and NHM producing premises to be required by legislation to segregate flexible plastic packaging for recycling no later than 31 March 2027.

2. Collecting plastic films from all obligated businesses, public bodies and other organisations by the 31 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.	
Collection and treatment contract limitations.	
MRF infrastructure and/or capacity.	
Inability to resource and mobilise within the timeframe.	
Cost Burden to obligated businesses, and NHM producing premises.	
Reprocessing availability.	
End Market volatility/lack of end markets.	
Other - please describe	Whilst there may be challenges when implementing changes to waste collections, as highlighted in response to Proposal 14, it is essential that the materials collected from businesses for recycling is consistent across the UK, to drive up the volume of materials and improve the quality of output.

Proposal 23: Businesses and the NHM sector will be provided with a minimum two-year notification of a statutory requirement to collect dry recyclables as separate streams, segregated

from residual waste, with a further phasing of such legislative requirements for small and micro businesses producing NHM waste.

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.	
Collection and treatment contract limitations.	
MRF infrastructure and/or capacity.	
Container procurement and distribution challenges.	
Reprocessing availability.	
End Market volatility/lack of end markets.	
Cost burdens to collectors of setting up new or expanded collection services.	
Other - please describe	Whilst there may be challenges when implementing changes to waste collections, as highlighted in response to Proposal 14, it is essential that the materials collected from businesses for recycling is consistent across the UK, to drive up the volume of materials and improve the quality of output.