

POLICY ON ‘BRING’ RECYCLING FACILITIES

Introduction

The most common form of recycling available to the public outside of Civic Amenity and Recycling Sites is bottle and textile banks. However this has expanded in recent years to cover a range of other waste materials e.g. Plastics, Aluminium Cans or Aluminium Foil, Steel Cans and Food or Drink Cartons. Recycling banks are known as ‘Bring’ facilities, as people bring their recycling to specific sites and deposit them in the facility provided. This is a further method for increasing the level of recycling and diverting valuable resources from landfill.

The facilities are generally located in publicly accessed, highly visible locations. These include shopping centres, garage forecourts, leisure/sports centres and public open spaces. A key requirement in locating recycling banks is to ensure that additional car journeys are not needed to deposit the items. If they are located appropriately, they can be an important complement to other recycling systems. The banks encourage community participation and help to raise awareness of recycling ‘green issues’ generally.

This revised policy will cover the siting and management of recycling bring banks for specific waste streams contained within and specified in Schedule 2, Part 1, Paragraph 18 of the Waste Management Licensing Regulations (NI) 2003 (2003 Regulations). The waste accepted and stored under the Revised Policy and Paragraph 18 of the 2003 Regulations must be reused, or used for the purposes of any activity described in Paragraph 12 of the 2003 Regulations or, any other recovery activity. Subsequent treatment and storage of waste exempted under the revised policy must be authorised under a Paragraph 12 (Treatment) and Paragraph 17 (Storage) exemption from Waste Management Licensing or in accordance with a Waste Management licence authorised under the 2003 Regulations.

Regulatory Implications

Within Paragraph 18 of the regulations a number of criteria must be followed when considering bring bank sites. These are:

- (1) the storage on any premises in a secure container or containers of the following wastes:
 - paper or cardboard
 - Textiles
 - Plastics
 - Glass
 - Steel cans, aluminium cans or aluminium foil
 - Food or drink cartons

These premises may be open to the public.

In this instance a “secure container” means that, reasonable precautions are taken to ensure that the waste kept in it cannot escape and that members of the public cannot

have access to that waste. This does not prevent access to the containers by the public, so that they may deposit waste in them and the following criteria apply -

(1)(a) limits the total capacity of the container or of all containers taken together (not the quantity of waste stored, not the capacity for any one type of waste) at those premises to 400m³.

(1)(b) restricts the total number of containers permitted on the premises to 20 containers and (d) specifies that the waste deposited must be for reuse or recovery.

(1)(c) specifies that the wastes must be kept separately, that is, separately both from other wastes and from other materials. Where more than one waste is grouped in (1) above, these wastes may be stored together, for example aluminium foil and cans need not be segregated from steel cans.

(1)(d) states that no waste may be stored on the premises for longer than twelve months and (1)(g) the person storing the waste must either be the owner of the container or have the consent of the owner.

Siting Implications

For the most part, siting arrangements fall outwith the criteria for Paragraph 18. However, there may be associated issues which should be taken into account, prior to commencing with this new activity and applying to NIEA for an exemption:

- The applicant must be able to satisfy the Relevant Objectives contained within Paragraph 4(1) of Schedule 3 to the 2003 Regulations, when making an application and must be maintained throughout the duration of the exemption;
- Good housekeeping must be observed;
- Bring Banks must be fit for purpose throughout the duration of the exemption;
- Each time a bin is emptied, the site must be tidied and any associated discarded litter should be removed from the site by the vehicle driver.

Financial Implications

Paragraph 12 of the Waste Management Licensing Regulations (NI) 2003 states that the Department shall charge an applicant in respect of its consideration of his application and (a) in the case of an exempt activity in Paragraph 18, a fee of £730 payable every 3 years.

NIEA accepts that this has financial implications for councils, operators, voluntary organisations, shopping centre management etc to submit waste exemption applications and fees for each bring bank site every 3 years and is contradictory to encouraging landfill diversion through increased recycling

It would also seem unreasonable and impractical in terms of NIEA resources to audit and inspect all bring bank premises, to ensure compliance with the exemption registration. Councils and traders have also highlighted that this is duplication of effort, as their staff would regularly carry out inspections of their sites and maintain them to a high standard.

In addition, applicants may manage and control a large number of Bring Bank sites and this will result in high fees to be submitted to NIEA. This could ultimately lead to the removal of bring bank sites and would not be in keeping with our message, to encourage the public to recycle, increase recycling rates and help divert waste from landfill. There is also the threat of fly tipping of recyclables where bank sites have been discontinued.

NIEA Revised Policy

In accordance with Paragraph 18 of the 2003 Regulations, under the revised 'Bring Bank' policy, the waste streams permitted to be accepted and stored are only: Textiles; Plastics; Glass; Steel cans; aluminium cans or aluminium foil; Food or drink cartons. In future a waste exemption application under this revised policy for those waste streams only will require ***one application*** from each applicant, for ***all*** of their bring bank sites. In this instance, the applicant will be taken to mean the owner of the bring bank. The exemption application must include a schedule providing details of the site location, e.g. the number of banks, locations (with site plan) and types of waste accepted. However, it must be emphasised that the criteria set down in the regulations will still be applicable (see ***regulatory implications*** above). In addition the application will only attract one fee for all sites registered that owner and will have to be renewed every three years.

NIEA considers that this revised policy will greatly reduce the administrative burden and costs to applicants. For example, a recycling operator or voluntary organisation who own a large number of bring banks throughout Northern Ireland, will in future only be required to submit one application to NIEA. The success of this revised policy will be dependant on the operator or consenting landowner undertaking self monitoring of their sites, to maintain a high standard of site management. Any changes to the details of the application, during the period of the exemption, will be notified to the Department prior to any changes being implemented.

Transitional Arrangements

At present there are a number of registered Paragraph 18 exemptions on the NIEA Public Register. NIEA will not seek renewals from applicants, who are not the owners of the Bring Banks, as these exemptions near the end of their three year approval. No refunds for any fees paid to date, will be given.

Summary

From January 1 2009, NIEA will seek Paragraph 18 waste exemption applications from all bring bank owners. They will be permitted a specified period of time to prepare and submit all the required documentation.

The exemption application must include a schedule providing details of the bring bank premises, e.g. the number of banks, locations (with site plan) and types of waste accepted. The criteria set down in the regulations will still be applicable (see ***regulatory implications*** above). Each application will only attract one fee for all sites and will require renewal every three years.

NIEA will regularly review this change to our existing policy and if required will act to revoke or, if there is cause for concern, withdraw this arrangement.

Pamela Patterson