

## Response ID ANON-XZ49-NTWY-H

Submitted to Regulation (EU) 2024/1157 on shipments of waste, amending Regulations (EU) No 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) No 1013/2006

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### Consent

The Windsor Framework Democratic Scrutiny Committee would like your permission to publish your consultation responses. Please indicate your publishing preference.

### Publish response

Organisation: Recycle NI (trade association for waste management companies in NI)

## Impact of EU Act

### 1 Does it appear likely that the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

Yes

#### Tell us why :

The EU WSR restricts the export of recyclables to non-OECD countries and this could add significant costs to the treatment of recycled materials generated in Northern Ireland, which would be passed on to ratepayers and could impact on Northern Ireland's ability to meet future recycling targets (UK and EU targets). This in turn could attract monetary fines that would impact on ratepayers or taxpayers. More than 50% of municipal waste recycling is comprised of paper and the biggest international paper recycling market is India. As India produces a very large quantities of paper products consumed in Europe, exporting waste paper to India completes the circle that is the Circular Economy. Recycle NI supports indigenous recycling infrastructure and our members supply recycled paper to Huhtimaki paper recycling plant near Lisburn, but this has limited demand, so the export market is essential.

Article 40 of the EU WSR prohibits the export of waste for recycling to Non-OECD countries unless those countries are included in a list under Article 41. We fear that India may not be included in that list, which has yet to be established. The application process appears to be highly onerous. The international market is also important for metal recycling. The Northern Ireland economy is too small and labour and energy costs are too high to support metal re-processing infrastructure or a paper mill, so we are unlikely to see such infrastructure developed locally in the future. Therefore, keeping options open for the export of recyclable materials is essential to the people and communities in Northern Ireland.

### 2 Does it appear likely that NOT APPLYING the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?

No

#### Tell us why:

As an OECD country, the UK can continue to trade recyclable materials with the EU under the terms of the new EU WSR. We already use the trans-frontier shipments system for that purpose and will use the electronic system when it is introduced. We do not expect significant negative impacts to that trade if NI does not transpose the new WSR.

**3 Are there any other matters regarding the EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary.**

Unsure

**Tell us why :**

We are unsure if adopting the new EU WSR would have an impact on trade in waste and recyclables between NI and GB. It is important that waste can travel freely within the UK, so we would like to avoid any checks or barriers across the Irish Sea. Staying outside the new EU WSR should hopefully facilitate that intra UK trade. We are unsure on how that might be impacted by the adoption of the new EU WSR.

A significant quantity of mixed dry recyclables are sent to NI from GB for processing at our 'State of the Art' processing plants and in return, sorted and baled recyclates are sent back to GB and further afield for re-processing as secondary raw materials.

Also, we have a lack of capacity for thermal treatment of residual wastes in NI and we rely on GB for processing that material. There are also some pharmaceutical and other wastes that require safe disposal by way of High Temperature Incineration and NI does not have such a facility, so those materials are exported to GB.

Finally, we are concerned that one week has been insufficient time for a response to this consultation. The EU WSR is a very large piece of legislation (145 pages) that will have a major impact on waste management in Europe and Internationally. There are aspects to this legislation that we may not fully understand at this point in time and we have been given too little time to fully research the implications in advance of responding to this survey.