

DEPARTMENT OF INFRASTRUCTURE

Principles for the Waste Strategy

Consultation Feedback



Isle of Man
Government

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663 – Responses to the Waste Strategy Principles consultation

Public Consultation on the Waste Strategy Principles

The public consultation on the Waste Strategy Principles closed on the 31st October 2024. The responses have been reviewed and are summarised below. The Waste Strategy 2025 – 2025 will cover all of the Island’s waste streams and not just household waste.

Waste Strategy Aims

The key strategic aims are that the Waste Strategy should be an Isle of Man Government Strategy and align with the objectives of the Island Plan and provide support and disposal options for:

- Household waste and commercial waste (of a nature similar to household waste)
- Industrial (including agricultural) and other commercial waste
- Industrial waste – construction and demolition waste
- Hazardous waste, including problematic waste e.g. WEEE, AWCCT, Radioactive

Guiding Principles for the Waste Strategy

The waste hierarchy principals and usage in the Waste Strategy will be designed to fit the Island’s waste policies while encouraging prevention, reuse, recycling, and recovery of waste taking into account the Island’s distinguishing characteristics, and physical location, which impact on how wastes can be managed, while being economical.

Associated statutory requirements, incentives, disposal fees, and waste facilities operation and development will be set at appropriate levels to encourage compliance.

The Island needs to know when waste is produced there are facilities and schemes for its safe management, now and in the future from collection, processing & disposal.

Obtaining privatised operations and investment where possible:

- Cost effective
- Technical expertise
- Reduce environmental Impact

Implementing policy and legislation changes only after:

- Consultation with stakeholders
- Impact assessment
- Provisions for the management of waste is in place – infrastructure, contracts

Question in the public consultation - **Do you agree that a Waste Strategy should be determined to move towards a strong and diverse economy and an environment we can be proud of in accordance with Our Island Plan?**

Responses:

Option	Total	Percent
Strongly disagree	61	9.20%
Disagree	32	4.83%
Neither agree nor disagree	86	12.97%
Agree	227	34.24%
Strongly agree	232	34.99%
I don't know	10	1.51%
Prefer not to say	7	1.06%
Not Answered	8	1.21%

Principle - Waste Collection Optimisation

Each Local Authority is responsible for their own area and the service provided differs depending on where you live e.g. inclusion of kerbside recycling collection and collection of general household waste every 1 or 2 weeks. Optimising collection routes and standardising refuse collection vehicles through a centralised service could assist in reducing emissions to achieve the Isle of Man Climate Change Plan 2022-2027 objective.

Question in the public consultation - **Do you agree that the Waste Strategy should determine how centralising household waste collection services could reduce costs, reduce environmental impact including greenhouse gas emissions and determine appropriate household waste provisions for the Island?**

Responses:

Option	Total	Percent
Strongly disagree	94	14.18%
Disagree	70	10.56%
Neither agree nor disagree	59	8.90%
Agree	185	27.90%
Strongly agree	234	35.29%
I don't know	14	2.11%
Prefer not to say	3	0.45%
Not Answered	4	0.60%

Principle - Prevention & Minimisation

In the UK waste reduction is encouraged through legislation requirements which include waste minimisation plans at Local Authority level and waste management plans at Central Government level, identifying key sectors for action e.g. construction, electronics, plastics, packaging, food.

The Waste Strategy should assess the key sectors and the legislation changes required to assist with encouraging waste reduction for the Island.

Question in the public consultation - **Do you agree the Waste Strategy should determine a Waste Reduction Programme to divert products and materials from residual waste and stimulate recycling opportunities for the Island?**

Responses:

Option	Total	Percent
Strongly disagree	55	8.30%
Disagree	39	5.88%
Neither agree nor disagree	55	8.30%
Agree	206	31.07%
Strongly agree	291	43.89%
I don't know	11	1.66%
Prefer not to say	2	0.30%
Not Answered	4	0.60%

Principle - Reuse & Recycling

The centralised management of recyclable material could assist with gaining more revenue as better prices potentially could be achieved for larger volumes, alongside reduced costs from optimising transport. Any contamination could be removed from the waste to improve the value of the recyclable material. Targeting high-value recyclables should result in recycling schemes paying for themselves.

Question in the public consultation - **Do you agree that the Waste Strategy should determine ways to increase reuse and recycling of the Island's wastes?**

Responses:

Option	Total	Percent
Strongly disagree	49	7.39%
Disagree	13	1.96%
Neither agree nor disagree	34	5.13%
Agree	222	33.48%
Strongly agree	332	50.08%
I don't know	4	0.60%
Prefer not to say	4	0.60%
Not Answered	5	0.75%

Principle - Energy Recovery

The current Energy from Waste facility can reasonably continue to operate until at least 2035 without the major capital expenditure of building a new facility. The tonnage incinerated at the Energy from Waste facility has significantly reduced over the years to just under 50,000 tonnes in 2023.

The benefits of maximising electricity generation through the Energy from Waste facility, potentially up to 10% of the Island's needs, by diverting low value recyclable wastes with high calorific value to the facility should be determined. This would also reduce the need to generate electricity from fossil fuels.

Question in the public consultation - **Do you agree that the Waste Strategy should maximise energy recovery by diverting incinerable wastes to the Energy from Waste facility?**

Responses:

Option	Total	Percent
Strongly disagree	53	7.99%
Disagree	23	3.47%
Neither agree nor disagree	63	9.50%
Agree	258	38.91%
Strongly agree	225	33.94%
I don't know	33	4.98%
Prefer not to say	4	0.60%
Not Answered	4	0.60%

Principle – Incineration of Hazardous Waste

Under current legislation the secondary waste incinerator can only dispose of clinical waste and waste oil. The replacement secondary waste incinerator for 2025 has the design capability to incinerate additional hazardous waste streams such as flammable waste, pesticides and some small laboratory waste. The current cost to industry for shipment and disposal in the UK for flammable waste is £3,000-£4,000/tonne,

and for pesticides £15,000/tonne. A change in legislation is required to allow additional hazardous waste streams to be incinerated in the secondary waste incinerator. This would assist with the Island's international responsibility to dispose of its own wastes and provide a more economic disposal route for some of industry's hazardous wastes which are currently exported off Island at great cost.

Question in the public consultation - **Do you agree that the Waste Strategy should explore maximising the utilisation of the secondary waste incinerator for self-sufficiency and economic benefit of disposal of the Island's suitable hazardous wastes?**

Responses:

Option	Total	Percent
Strongly disagree	30	4.52%
Disagree	25	3.77%
Neither agree nor disagree	51	7.69%
Agree	297	44.80%
Strongly agree	211	31.83%
I don't know	41	6.18%
Prefer not to say	3	0.45%
Not Answered	5	0.75%

4Principle – Landfill

There are problematic waste streams on the Island that are too expensive to send to the UK for disposal. This is sometimes due to the large quantity of material such as marina dredging spoil or because a disposal route cannot be found in the UK for such small volumes, such as radioactive waste sources in schools and the hospital. The Island's current landfills are classified as 'dilute and disperse' landfill, with leachate from the landfill sites going out to sea. To continue with the 'dilute and disperse' approach will leave the Island with a potential legacy of pollution of ground water, rivers and coastal waters for future generations. Any new landfill should be developed to standards implemented in the UK as best practice with improved environmental protection.

Question in the public consultation - **Do you agree that the Waste Strategy should determine the strategic need to develop new landfill(s), suitably engineered to provide appropriate environmental protection, for waste disposal where recovery (including re-use, recycling and energy recovery) is not reasonably practicable or economically viable?**

Responses:

Option	Total	Percent
Strongly disagree	46	6.94%
Disagree	68	10.26%
Neither agree nor disagree	74	11.16%
Agree	292	44.04%
Strongly agree	137	20.66%
I don't know	35	5.28%
Prefer not to say	4	0.60%
Not Answered	7	1.06%

Principle - Waste Regulation

Whilst economic intervention such as the Energy from Waste Facility gate fee or a landfill tax can influence waste recovery and/or disposal routes, to a certain extent, to achieve sustainability, protection of human health and the environment, and GHG emission reduction legislative changes are likely to be required to assist with implementing the Waste Strategy.

Question in the public consultation - **Do you agree that the Waste Strategy should determine the legislative interventions likely to be required by the Government to assist implementation of the Waste Strategy.**

Responses:

Option	Total	Percent
Strongly disagree	44	6.64%
Disagree	43	6.49%
Neither agree nor disagree	90	13.57%
Agree	292	44.04%
Strongly agree	135	20.36%
I don't know	45	6.79%
Prefer not to say	5	0.75%
Not Answered	9	1.36%

Next steps

- Commission IoM Waste Strategy to meet approved principles.
- Continue Stakeholder consultation throughout the process
- Approval of Waste Strategy
- Draft new Waste Legislation and seek Tynwald approval
- Draft waste policies for the implementation of the Waste Strategy