

DEPARTMENT OF INFRASTRUCTURE

Public Consultation

Waste Strategy Principles



Isle of Man
Government

Reiltys Ellan Vannin

Overview

The Department of Infrastructure (DOI) is consulting on the principles to be used to determine an updated Isle of Man Waste Strategy for the intended period 2025 - 2035.

This consultation is seeking stakeholders' views on the proposed principles, which will then be used to develop a more detailed strategy. The aim is to develop a Waste Strategy that is reliable, economical, environmentally acceptable and sustainable for the benefit of everyone on our Island.

Why your views matter

This consultation will provide us with a useful opportunity to consider stakeholder views at this stage of our policy development before introducing any contractual and/or legislative changes to bring the proposed changes into effect.

How to participate

The Department would like to hear your views on the principles for the new Isle of Man Waste Strategy. To participate in this consultation by post or e-mail please submit your responses using this form to:

Waste Management Unit
2nd Floor, Markwell House
Douglas,
Isle of Man
IM1 2RZ

rita.greenwood2@gov.im

About you

What is your name? (optional)

Name:

What is your age group? (optional)

| | |
|--|-------------------|
| | Under 16 years |
| | 16 – 24 years |
| | 25 – 34 years |
| | 35 – 44 years |
| | 45 – 54 years |
| | 55 – 64 years |
| | 65 – 74 years |
| | 75 years or over |
| | Prefer not to say |

Are you a Waste Operator? (optional)

| | |
|--|-----|
| | Yes |
| | No |

What is your Local Authority Area? (optional)

Local Authority:

Are you responding on behalf of an organisation? (optional)

| | |
|--|-----|
| | Yes |
| | No |

Organisation:

May we publish your responses?

| | |
|--|--|
| | Yes, you can publish my response in full |
| | Yes, you may publish my response anonymously |
| | No, please do not publish my response |

Introduction

Current Situation

The current management of household waste and services provided by Local Authorities vary as to whether collections are every 1 or 2 weeks, kerbside collection of recyclables and more recently whether, a Civic Amenity Site service is provided.

Which types of wastes are recycled on the Island is largely dependent on whether it is more economical for the Local Authority, waste management company or waste producer to send these materials to the UK for recycling or pay the gate fee at the Energy from Waste (EfW) facility or landfill for disposal. This does not take into account the economics of operating the Island's national waste infrastructures or meeting the objectives of the Island's Waste Strategy.

Central Government waste facilities generate income from gate fees while Local Authorities generate income for household waste facilities through rates and any commercial waste facilities through charges. Currently Government subsidises the Energy from Waste facility by approximately £2.5m per annum and the Animal Waste Processing Plant (AWPP) by £500k per annum.

Proposed Strategy

The Isle of Man's Waste Strategy will consider all waste streams including households, business, agriculture and industry. This is a significant opportunity to maximise the use of the existing waste infrastructure, review options to obtain the best value from recyclables, to reduce greenhouse gas emissions and encourage new business to grow our green economy.

Consideration of a centralised hub for waste recycling and potentially centralisation of household waste collections is proposed to reduce costs, standardise household waste services and increase recycling through economies of scale. Utilisation of waste facilities such as the Energy from Waste facility should be reviewed to ensure they continue to provide public value.

Policy Proposals and consultation questions

The EU Waste Framework Directive (Directive 2008/98/EC) established the waste hierarchy as the guiding framework for managing waste. The focus was to be on waste reduction, with reuse, recycling, and recovery of energy all of greater priority than final disposal. The waste hierarchy usage in the Waste Strategy should 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.

Island Plan Objectives

Our Island Plan can be found at <https://islandplan.im/> .

Waste is part of the economy and its management has economic implications for businesses, government expenditure and impacts the environment. A Waste Strategy is required to align with the objectives of the Island Plan.

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?

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

Collection of household waste

Currently household waste collection and any kerbside collection of recyclables is controlled by and the responsibility of the Locals Authorities. As each Local Authority is responsible for their own area 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. There are numerous contracts in place with differing costs and associated differing rate costs for the management of household waste. Optimising collection routes and standardising refuse collection vehicles through a centralised service will also assist in reducing emissions to achieve the Isle of Man Climate Change Plan 2022-2027 objective.

Potential cost savings and emissions reductions could be realised by:

- Centralising the collection and management of household waste
- Optimising collection routes and vehicles
- Powering bin lorries with zero or low emission fuel sources.
- Bulking up recyclables to obtain best market values and economise export costs.
- Optimising energy recovery by disposal of incinerable wastes to the EfW facility.

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?

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

Prevention & Minimisation

By reducing or eliminating waste generation, this supports efforts to promote a more sustainable society. Waste minimisation involves redesigning waste processes and/or changing societal patterns of consumption and waste production.

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.

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?

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

Reuse & Recycling

Creating less waste by increasing awareness of the need to reuse and recycle more types of materials that have value, while making it easier for the public and industry to do so, is recommended.

The current recycling facilities on the island include kerbside collections in Douglas and Braddan, Civic Amenity Sites and 'bring bank' bins located around the Island, as well as other private enterprises. The cost to operate Civic Amenity Sites varies from £120 - £186/tonne of waste depending on the site. The revenue generated from the recyclable material collected varies between the sites as each have different contracts.

Centralised management of recyclable material targeting the most valuable recyclables and the recycling of waste streams that have a negative impact on operations of the current waste infrastructure is recommended. This includes waste electrical and electronic equipment, batteries, glass, and metal being sent to the Energy from Waste facility.

The centralised management of recyclable material would 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.

The Waste Strategy should:

- Aim to increase re-use and recycling by including requirements for this in waste management legislation.
- Assess which recyclables have value, including optimising current waste facilities for disposal of waste streams that have low recycling value.
- Develop an Island wide collection and central recycling facility for target recyclables.

Do you agree that the Waste Strategy should determine ways to increase reuse and recycling of the Island's wastes?

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

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. This has had an impact on the operations of the facility requiring it to shutdown 4 to 5 times a year, which is more than the projected maintenance shutdown of twice a year. Each shutdown requires 30,000 litres of oil for the subsequent restarting of the facility, with associated costs, emissions and environmental impact.

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.

The Waste Strategy should:

- Assess prolonging the lifespan of the current Energy from Waste facility.
- Optimise the operation of the Energy from Waste facility by energy recovery from burnable waste streams of low recyclable value.
- Assess the recovery heat from the Energy from Waste facility.

Do you agree that the Waste Strategy should maximise energy recovery by diverting incinerable wastes to the Energy from Waste facility?

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

Incineration of Hazardous Wastes

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.

The Waste Strategy should:

- Aim to change legislation to allow the disposal of additional hazardous waste
- Optimise the operation of the secondary incinerator by burning additional hazardous waste to reduce disposal costs to industry.

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?

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

Landfill

Landfill is the least desirable method of waste management, however it is acknowledged that the Island must have a secure landfill disposal site for some waste streams that takes full account of environmental and health impacts.

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.

To discourage unnecessary use of landfill sites the cost of disposing of waste streams to landfill should be more expensive than sending waste to the Energy from Waste facility or any recycling options.

The Waste Strategy should:

- Include a strategic needs assessment for new landfills for inert, non-hazardous, stable non-reactive hazardous waste, and hazardous waste
- Review the current lifespan of existing landfills and the environmental impact
- Assess legislation changes for environmental protection requirements for landfill operations
- Assess the introduction of financial disincentives to encourage recycling/recovery

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?

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

Legislative requirements

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.

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.

| | |
|---------------------------------|---------------------------|
| | Strongly disagree |
| | Disagree |
| | Neither agree or disagree |
| | Agree |
| | Strongly agree |
| | I don't know |
| | Prefer not to say |
| Do you have any other comments? | |

Additional comments

Additional comment:

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|--|
| |
|--|

The consultation will close on the 30th September 2024, Thank you for taking the time to engage.