

Northern Ireland Resources Network (NIRN) Response to the From Waste to Worth: Northern Ireland Waste Prevention Programme Consultation 2026

Introduction

The Northern Ireland Resources Network (NIRN) welcomes the opportunity to respond to the **From Waste to Worth** consultation and wishes to highlight at the outset why this consultation matters so profoundly to our network and to the wider community, charity and social enterprise sector working in waste prevention, reuse and repair across Northern Ireland.

The importance of this consultation

From Waste to Worth is a practical framework that will directly shape how waste prevention is resourced, delivered and supported across Northern Ireland for years to come. For charities, social enterprises and community groups on the frontline of reuse and repair, this consultation represents one of the most significant opportunities in recent years to influence the direction of government policy in an area where the community and voluntary sector has already demonstrated it can deliver exceptional results.

Why NIRN exists and why this consultation matters to us personally

NIRN's own existence is a direct result of the vision shown in DAERA's previous Waste Prevention Programme, published in 2019 — "Stopping Waste in its Tracks." That programme included Action 16, a commitment by DAERA to undertake a feasibility study into the economic and social benefits of establishing a reuse and repair network in Northern Ireland. It was this action, **this single line of policy commitment**, that provided the **impetus for what became NIRN**.

Established as a pilot project in 2020, NIRN developed into a fully formed, standalone organisation in February 2022. In the four years since, we have grown to a network of over 70 members representing community groups, social enterprises and charities, with all local

authorities in Northern Ireland also part of our network. We have collectively saved over 126,000 tonnes of carbon, reused almost 23,000 tonnes of materials, supported 1,295 employees and 7,036 volunteers contributing over 910,000 hours of activity, and benefited almost one million people across Northern Ireland.

None of this would have been forthcoming without DAERA's foresight in including Action 16 in the 2019 programme. **It is a powerful reminder of what a single well-crafted policy commitment, backed by genuine support, can achieve.**

What this consultation can achieve

The From Waste to Worth programme offers a similar opportunity. The 21 actions it contains have the potential to significantly strengthen awareness of and action on waste prevention, reuse and repair across Northern Ireland and to provide the community and voluntary sector, alongside local authorities, with the frameworks, resources and recognition needed to scale what is already working.

NIRN has engaged carefully with every action in this programme. Our responses are grounded in the lived experience of our members, the evidence of what works on the ground, and a clear understanding of where policy can make the greatest difference. We urge DAERA to consider these responses as the collective voice of a sector that has already proven what is possible, and that is ready and willing to do more.

Our approach to this response

NIRN has chosen to respond to those actions where we have direct experience, evidence or a clear stake in the outcome on behalf of our members. We have not responded to every action and have focused our energy where our voice is most relevant.

Action 3 – Deposit Return Scheme

DAERA will implement the Deposit Return Scheme for single use drinks containers. This is due to go live from October 2027 to include PET plastic, steel, and aluminium drinks containers from 150ml to 3l to further drive-up recycling rates and reduce littering.

Respond: Agree

We wish to raise an additional point for DAERA's consideration: the question of unclaimed deposits and how this revenue should be directed.

The Republic of Ireland's DRS (Re-turn), which launched in February 2024, provides a precedent. Over €66 million in deposits went unclaimed in scheme's first year (funds that accumulate when consumers purchase but do not return containers). In the Republic, this money is retained by Re-turn and reinvested in scheme operations.

The **Organisation for Economic Co-operation and Development (OECD)** recommends that the treatment of unredeemed deposits should be prescribed in legislation rather than left to scheme operators. Specifically, it notes that *"the use of this revenue should be determined by regulation" and that public authorities may "fully or partially claim revenues from unredeemed deposits and earmark the income to cover costs associated with externalities caused by unreturned products that are littered or disposed of in household waste."*

Can DAERA consider, in collaboration with England and Scotland, in the design of this scheme's governance and financial framework, whether unclaimed deposit revenue could be directed toward waste prevention education and community-level activity. Specifically, we ask DAERA to:

- Publish transparent projections of expected unclaimed deposit levels once the scheme is operational.
- Consult on a mechanism to allocate a proportion of unclaimed revenue to waste prevention programmes rather than this money remaining entirely within scheme operator reserves.

Action 4 – WEEE Reform

DAERA will collaborate with Defra and the other Devolved Governments to implement WEEE Reform

Respond: disagree

While we support collaboration with Defra and devolved governments on WEEE reform, the action as stated focuses entirely on improving recycling rates which sits at the lower end of the waste hierarchy. It makes no reference to reuse or repair, which should be prioritised above recycling under the waste hierarchy principles

Current UK WEEE regulations do recognise reuse (for example, "preparing for reuse" is part of the treatment hierarchy), but there is **no dedicated producer funding obligation** comparable to that for collection and recycling. This means that a working appliance brought to a recycling centre is treated the same as one that is genuinely beyond repair. True waste prevention for electrical goods means keeping items in use longer, not simply improving what happens to them after they are discarded.

There is strong international evidence that linking producer responsibility funding to repair works. France has required producer responsibility organisations (éco-organismes) to finance repair funds under its Extended Producer Responsibility system. These funds support the national "repair bonus", which provides consumers with a subsidy when they have eligible electrical and electronic products repaired by approved repairers. Additional WEEE producer contributions were introduced from July 2024 to finance the expansion of these repair funds [Germany's Thuringia region](#) ran a repair bonus scheme from 2021 to 2024 which supported 33,288 repairs and 390 tonnes of electronic waste.

We ask DAERA to ensure that WEEE reform goes beyond recycling targets and includes:

- A requirement that a proportion of WEEE producer responsibility fees be directed toward repair and reuse activities, including community repair initiatives.
- A requirement that electrical items brought to recycling centres are assessed for reusability before being processed for recycling.

Action 5 – Carrier Bag Levy

DAERA will continue to administer the levy and ensure the revenue is allocated to additional environmental projects within Northern Ireland.

Respond: Agree

We fully support the continued administration of the Carrier Bag Levy, which has demonstrated that well-designed environmental charges can deliver both behavioural change and meaningful funding for community action.

We ask DAERA to consider directing an increasing proportion of levy revenue toward organisations working at the highest tiers of the waste hierarchy in prevention, reuse and repair. This would ensure that both the levy itself and the projects it supports are aligned with the principles of the waste hierarchy.

Community groups, charities and social enterprises delivering reuse schemes, repair cafés and waste prevention education provide excellent value for money by extending product lifespans, reducing waste generation, supporting local employment and skills, and improving access to affordable goods for households. Prioritising investment in these activities would strengthen the alignment between how levy revenue is raised and how it is spent, while supporting Northern Ireland's transition to a circular economy.

We also encourage DAERA to publish annual reporting on the environmental and social outcomes achieved through Carrier Bag Levy funding, including the contribution made to waste prevention, reuse and repair. This would improve transparency and help ensure that funding continues to deliver maximum environmental benefit.

Action 6 – Absorbent Hygiene Products

DAERA will support WRAP in conducting an AHP Collection study into the separation of AHP waste.

Respond: Agree

NIRN welcomes the proposed WRAP study into Absorbent Hygiene Product (AHP) waste collection. However, we ask DAERA to ensure the study goes beyond end-of-life management and considers the opportunity for waste prevention at the top of the waste hierarchy, which is the primary objective of the Waste Prevention Programme.

Reusable alternatives to disposable AHPs are well established, increasingly widely used, and offer significant environmental and cost benefits. A 2023 Defra Life Cycle Assessment found that reusable nappies can have a 25% lower carbon footprint than single-use disposables, with further reductions possible depending on washing and drying practices. In the UK, an estimated 3.6 billion disposable nappies are discarded annually, with associated disposal costs exceeding £140 million per year. Reusable sanitary products, including menstrual cups, period pants and washable pads, also offer substantial waste reduction potential, with individuals using more than 11,000 single-use period products over a lifetime.

We also note that while AHP collection and recycling trials have previously been explored in Northern Ireland by local councils, uptake has been limited. This highlights the importance of ensuring that future work captures and learns from existing pilots, including what has worked, what barriers were encountered, and why participation was constrained. These lessons should inform a more holistic approach that prioritises prevention rather than focusing solely on disposal routes.

We therefore ask DAERA to use the WRAP study as a basis for developing a pilot reusable AHP incentive scheme in Northern Ireland, working with councils and community organisations to provide vouchers or starter packs for reusable nappies and menstrual products. Such a pilot would deliver waste prevention at the top of the hierarchy, generate robust evidence on behavioural change in a Northern Ireland context, and help address wider social issues including household cost pressures and period poverty.

We also suggest that any pilot include structured awareness-raising, practical user guidance on selection, washing and maintenance of reusable products, and targeted community engagement to support uptake and sustained behaviour change. The findings from such a pilot

should then be used to inform any future scaling of interventions across Northern Ireland.

Action 7 – Waste Levies

DAERA will continue to tackle the problem of littering and work with stakeholders to advance the circular economy including the potential for introducing bans or levies on certain problematic product materials.

Respond: Agree

We support the introduction of further levies on problematic single-use products where there is clear evidence that they will reduce unnecessary consumption and encourage more sustainable alternatives. The success of the Carrier Bag Levy in removing approximately 2.4 billion single-use carrier bags from circulation and generating over £13.8 million for environmental programmes demonstrates what well-designed economic instruments can achieve.

We encourage DAERA to apply the lessons learned from the Carrier Bag Levy to any future product levies. Revenue should, wherever possible, be ring-fenced for programmes that deliver the greatest environmental benefit by supporting the highest tiers of the waste hierarchy, including waste prevention, reuse and repair. This would ensure that funds raised from discouraging wasteful products are reinvested in preventing waste and supporting the transition to a circular economy.

We also encourage DAERA to develop clear criteria for selecting products for future levies, taking account of their environmental impact, availability of reusable alternatives, and potential to reduce waste through behavioural change. This would provide transparency and help ensure that levies are targeted where they can deliver the greatest benefit.

Action 9 – European Week for Waste Reduction

DAERA will continue to support the European Week for Waste Reduction and will seek to build upon the outcomes and successes generated through participation in its associated competitions.

Respond: Agree

We welcome DAERA's continued support for the European Week for Waste Reduction (EWWR), which provides an annual platform for promoting waste prevention and the circular economy. We encourage DAERA to build on this by making small grants available to community groups, charities and social enterprises to deliver local activities during EWWR, such as repair cafés, swap events, upcycling workshops and school engagement programmes.

Combining practical funding with promotional resources and communications support would enable a wider range of organisations to participate, increase community engagement and encourage lasting behaviour change beyond the campaign week. These activities help people develop the skills and confidence to prevent waste through reuse and repair, supporting the highest tiers of the waste hierarchy.

Action 10 – Circular Councils

DAERA will assist NIRN to establish a Circular Councils network and develop a co-created waste prevention education programme with councils.

Respond: Agree

For the Circular Councils programme to deliver meaningful and sustained impact, it must engage across the entirety of council operations.

Northern Ireland's 11 councils collectively employ approximately 12,000 staff and over 450 elected members, working across planning, procurement, leisure, parks, estates, catering, events, finance, communications, human resources and other functions. Each of these areas presents opportunities to apply circular economy principles and prevent waste at source.

For example, procurement teams can prioritise reusable, repairable and low-waste products; planning teams can influence material use and resource efficiency in development; leisure and events teams can reduce reliance on single-use items; and elected members can shape policy and set expectations across council decision-making. Waste prevention education has traditionally been focused on waste management teams, meaning most staff and elected members have not been systematically engaged in circular economy learning relevant to their roles.

With over 12,000 council employees across Northern Ireland, even modest changes in awareness and practice across departments could deliver significant reductions in council waste and strengthen the leadership role councils play in influencing communities, businesses and local supply chains.

This approach would align with the wider ambition of embedding circular economy principles across public sector decision-making, ensuring councils are not only delivering waste services effectively but actively designing out waste in the services they commission, deliver and regulate.

Action 11 – Waste Prevention Metrics

DAERA will support NIRN to explore the establishment of a framework of metrics to monitor, evaluate, and report on waste prevention efforts across Northern Ireland

Respond: Agree

NIRN agrees with Action 11 and welcomes the commitment to work towards a framework of waste prevention metrics to monitor, evaluate and report progress across Northern Ireland.

The challenge in this area is significant. Within councils, reporting is largely focused on recycling tonnages rather than prevention activity, which sits higher up the waste hierarchy. At the same time, across the community, voluntary and social enterprise sector, which delivers much of Northern Ireland's reuse, repair and lending activity, many

organisations operate without EPOS systems, standardised stock management or dedicated data collection capacity. Activities such as charity shops, repair cafés, community fridges, tool libraries and swap events generate substantial environmental, economic and social value, but much of this impact is unmeasured or inconsistently recorded.

NIRN therefore considers that a meaningful metrics framework must go beyond waste tonnages and capture the broader value of waste prevention activity, reflecting its environmental, economic and social benefits.

This could include:

- **Environmental impacts**, such as materials diverted from disposal routes and estimated carbon savings using standardised conversion factors by material type.
- **Economic impacts**, including avoided waste management costs for councils and government, cost savings to households, and the value generated through reuse and repair activities.
- **Social impacts**, including volunteering activity, **employment and skills development** within the reuse and repair sector, community participation, and improved access to affordable goods and services.

Importantly, the framework must remain proportionate and accessible. It should be designed as a **simple reporting tool**, co-produced with the sector.

A standardised approach would allow data to be aggregated across NIRN's membership, enabling a clearer national picture of waste prevention activity. This would support three key outcomes: stronger evidence for investment in prevention; improved understanding within councils of the value of supporting community-based reuse and repair; and enhanced visibility of impact for organisations engaging funders, policymakers and the public.

The data already exists in fragmented form. A coherent framework would enable Northern Ireland to measuring the full value of circular economy activity across environmental, economic and social dimensions.

Action 12 – Circular Communities

DAERA will support NIRN to develop and deliver a Circular Communities Programme to embed reuse and repair into everyday community life.

Respond: Agree

NIRN strongly agrees with Action 12 and welcomes DAERA's commitment to support the development and delivery of a Circular Communities Programme. Embedding reuse and repair into everyday community life is precisely the kind of upstream, people-centred intervention that this programme should prioritise. NIRN's growing network of over 70 members demonstrates both the appetite for this work and its impact across Northern Ireland.

We wish to highlight one critical factor for the success of this action: the importance of structured peer-to-peer learning and systematic sharing of best practice across the circular communities sector.

NIRN's own development illustrates the value of this approach. Established as a pilot project in 2020 and developing into a fully formed organisation by 2022, NIRN benefited significantly from support provided by Community Reuse Network Ireland (CRNI), which brought extensive experience in operating a reuse and repair network on the island of Ireland. CRNI shared operational knowledge, practical lessons and established networks at a formative stage in NIRN's development. This support helped avoid duplication of effort, reduced early-stage costs, and prevented common challenges that had already been addressed elsewhere.

This experience has directly shaped NIRN's approach today. Peer-to-peer collaboration and knowledge exchange are central to how we support our members, by connecting organisations so that those establishing circular initiatives can learn from others with practical experience. This enables new projects such as repair cafés, community fridges and tool libraries to build on existing knowledge in areas including governance, insurance, volunteer management, communications, tool sourcing and impact measurement.

Without such structured knowledge sharing, there is a risk that good practice is repeatedly reinvented at the local level, slowing progress and reducing overall impact. With it, new initiatives can be established more quickly, operate more effectively, and achieve greater sustainability. Within the Circular Communities Programme, including structured opportunities for organisations to share practice, mentor new initiatives and disseminate tested models of delivery. NIRN is well placed to support this function.

Action 13 - Recognised Awareness Days

DAERA will support NIRN to co-ordinate a schedule of recognised awareness day campaigns.

Respond: Agree

NIRN agrees with Action 13 and welcomes DAERA's commitment to support the coordination of recognised waste awareness days. These campaigns play an important role in promoting waste prevention, reuse and preparation for reuse by providing focal points for public engagement and education on issues such as plastic pollution, food waste and electronic waste.

NIRN will lead a coordinated programme of multi-channel campaigns linked to key international and national awareness days. These campaigns will be supported by NIRN's network of members through local activities, event toolkits and accessible communications resources.

We encourage DAERA to build on this coordination role by providing small grants to enable community-led activities aligned with recognised awareness days. Local initiatives delivered by charities, social enterprises and community organisations, such as repair cafés, swap events, reuse workshops and educational activities, can complement national communications and help translate awareness into sustained behaviour change.

We also encourage DAERA to demonstrate visible leadership by actively participating in and promoting recognised awareness days through its own communications, events and partnerships. Recent initiatives provide

positive examples of this approach, including the collection of pre-loved clothing and household items at DAERA headquarters during Reuse and Repair Week for donation to the charity Hope365, and the promotion of reuse messaging through social media campaigns, including the reusable cup campaign linked to Earth Day.

Building on these examples through consistent annual participation would reinforce the importance of waste prevention across government, encourage wider engagement by businesses and local authorities, and help embed circular economy principles within everyday decision-making.

Action 14 – Consumer Food Waste Prevention

DAERA will maintain its partnership with WRAP to support the delivery of the Love Food Hate Waste campaign, aimed at preventing consumer food waste. DAERA and WRAP will co-develop follow-up initiatives designed to strengthen behavioural change and enhance messaging around food waste prevention.

Response: Agree

NIRN agrees with Action 14 and welcomes the continued partnership between DAERA and WRAP to deliver the Love Food Hate Waste campaign in Northern Ireland, which has a strong evidence base and high levels of public recognition.

However, we ask DAERA and WRAP to strengthen this action by more explicitly recognising and resourcing community organisations as delivery partners, rather than positioning Love Food Hate Waste primarily as a top-down communications campaign.

Behaviour change on food waste is most effective when delivered through trusted local settings and relationships, such as community centres, food banks, schools, community fridges and cooking clubs.

NIRN members and the wider community and voluntary sector are already embedded in the communities where food waste is most prevalent, and many are delivering activity that naturally aligns with Love Food Hate Waste messaging. However, this community delivery infrastructure is not currently reflected within the action as framed.

We therefore ask DAERA to strengthen Action 14 in the following ways:

- **Formally recognise community organisations, charities and social enterprises as delivery partners** for Love Food Hate Waste alongside WRAP and local councils, and ensure appropriate resourcing to support this role.
- **Link key campaign moments, such as Food Waste Action Week, to small-scale community grant funding**, enabling local organisations to deliver workshops, events and practical demonstrations that translate national messaging into local action.
- **Capture and report on community-level delivery and impact**, ensuring that the contribution of the third sector to food waste prevention is visible within programme monitoring and evaluation.

Community organisations working in food poverty, food redistribution and household financial resilience are uniquely placed to connect the environmental benefits of reducing food waste with its direct economic benefits for households. DAERA and WRAP should more explicitly harness this dual message in the design and delivery of the campaign.

Action 16 – Food Redistribution

DAERA will work in partnership with NIRN to collaborate with food redistribution networks to reduce avoidable food waste by enhancing their visibility and facilitating connections with businesses and public sector organisations. DAERA will provide support for targeted projects focused on food waste prevention

Response: Agree

We welcome DAERA's commitment to work in partnership with NIRN and food redistribution networks to reduce avoidable food waste, enhance visibility of existing initiatives, and facilitate stronger connections between surplus food producers and redistribution organisations.

Food redistribution is a practical and impactful example of circular economy thinking in action, where surplus food that would otherwise be

wasted is redirected for use, delivering environmental benefits while supporting communities experiencing food insecurity.

We also welcome recognition that targeted projects can play a role in food waste prevention. However, for this action to be effective and scalable, it is important to recognise that food redistribution requires sustained operational capacity, including staff time, transport, refrigeration, storage, food safety compliance, insurance and coordination infrastructure. Many organisations currently absorb these costs through short-term fundraising or cross-subsidisation, which limits scalability and long-term sustainability.

We therefore ask DAERA to ensure that any targeted funding for food redistribution projects is designed to cover the cost of delivery, including core operational requirements, and that multi-year funding is made available to enable organisations to plan, retain staff and scale activity effectively.

We also encourage DAERA to take a proactive role in identifying and unlocking sources of surplus food across all sectors. While supermarkets are the most visible contributors, volumes of edible surplus also arise within food manufacturing, hospitality, public sector catering (including schools, hospitals, councils and government facilities), and primary production. Many of these sources face logistical, regulatory or awareness barriers that prevent effective redistribution.

We therefore ask DAERA to:

- **Commission a comprehensive mapping exercise** of surplus food generation across all sectors in Northern Ireland, including the public sector.
- **Develop clear and practical guidance for businesses and public bodies** on food safety, liability and donation logistics to reduce perceived barriers to participation.
- **Facilitate structured connections between surplus food producers and redistribution organisations**, ensuring a coordinated and accessible route for donation.

- **Establish a regular partnership forum** involving DAERA, NIRN and food redistribution organisations to share learning, identify barriers and co-develop solutions, ensuring that operational experience directly informs policy development.

Action 19 – Circular Schools

DAERA will support NIRN to promote reuse and repair in school communities.

Respond: Agree

NIRN agrees with Action 19 and welcomes DAERA's commitment to support the promotion of reuse and repair in school communities. NIRN is already delivering the Circular Schools Programme, which is demonstrating strong potential to embed circular economy thinking across Northern Ireland's education sector.

The Circular Schools Programme is developing approaches to move beyond awareness-raising and knowledge transfer towards measurable behaviour change outcomes. The objective is for pupils to understand circular economy principles, and for schools and young people to actively apply them in practice.

The programme works with schools through interactive workshops and hands-on activities covering topics such as food waste reduction, textile repair and creative reuse of materials. These sessions enable pupils to repurpose discarded items into useful products, supporting innovation, problem-solving skills and practical understanding of resource efficiency.

NIRN members are involved in programme delivery, bringing real-world experience of reuse, repair and circular economy practice directly into school settings. This strengthens the relevance and authenticity of the learning experience.

We are seeking to strengthen links with council recycling and education officers, where these roles exist, to integrate Circular Schools modules into existing school and youth engagement activity and expand programme reach.

Action 20 – Support to the Third Sector for Zero Waste/Circular Economy Projects

The Department will continue to provide support to the Third Sector for zero waste/circular economy projects as part of ongoing funding operations and investigate new ways to do so.

Respond: Agree

We support the Department's continued commitment to funding third sector organisations delivering zero waste and circular economy activity. Across Northern Ireland, charities, social enterprises and community organisations have demonstrated strong capacity to deliver waste prevention through reuse, repair and sharing initiatives, alongside wider social benefits including skills development, volunteering opportunities, access to affordable goods and strengthened community resilience.

We encourage DAERA to strengthen this action in the following ways:

- **Increase and ring-fence funding for waste prevention activities**, including a growing proportion of revenue from the Carrier Bag Levy and any future environmental levies. Investment in prevention, reuse and repair delivers greater long-term environmental benefit than managing waste after it has been created.
- **Introduce multi-year funding cycles of at least three years**, enabling organisations to recruit and retain staff, plan longer-term programmes, develop partnerships and demonstrate sustained impact.
- **Simplify funding administration**, ensuring reporting and monitoring requirements are proportionate to grant size, with streamlined application and reporting processes for smaller organisations while maintaining appropriate accountability.
- **Support organisational capacity alongside project delivery**, including governance, staff development, communications, digital capability and financial resilience, to strengthen the long-term sustainability of the sector.

These measures would help build a more resilient third sector, enabling organisations to scale successful waste prevention initiatives and make a greater contribution to Northern Ireland's circular economy objectives.

Action 21 – Reuse and Repair Week

DAERA will support NIRN to establish an annual Reuse and Repair Week to promote waste prevention across Northern Ireland.

Respond: Agree

NIRN agrees with Action 21 and welcomes DAERA's continued support for Reuse and Repair Week. Following the successful delivery of the inaugural week in 2025, NIRN is proud to have established a strong foundation for what can become a long-term, high-impact annual initiative.

In 2026, activity expanded beyond the original concept of Repair Week to include reuse-focused activity, ensuring broader participation from NIRN members. The programme launched at Grand Central Station with a public repair café, bringing circular economy practice into a high-footfall public space and reaching audiences who may not previously have engaged with repair activity. The programme also included collaboration with Community Reuse Network Ireland through a Shared Island event, demonstrating the value of cross-border cooperation in strengthening circular economy networks.

Building on this foundation, NIRN's ambition is for Reuse and Repair Week to become a permanent fixture in both the Northern Ireland and wider Shared Island calendar, providing an annual focal point for coordinated action on waste prevention.

We envisage expanded participation in future years, including:

- Greater use of public spaces for repair and reuse activities
- Increased engagement from non-member organisations
- Integration with the Circular Schools Programme, with schools undertaking dedicated activities during the week
- Stronger involvement from councils and public bodies in hosting and promoting local events

We therefore ask DAERA to confirm its commitment to multi-year funding for Reuse and Repair Week, to actively promote the initiative across other Executive departments and public bodies, and to support its development as a nationally significant annual campaign for waste prevention and circular economy engagement.

Waste Prevention Programme

Question 22 - Do you agree that the Waste Prevention Programme should be incorporated into the Waste Management Strategy

Respond: Disagree

A standalone Waste Prevention Programme gives waste prevention the visibility, accountability and dedicated policy focus required as the highest priority in the waste hierarchy.

Article 29 of the Waste Framework Directive (2008/98/EC), as retained in UK domestic law, requires the establishment of waste prevention programmes. While the Directive permits such programmes to be integrated within waste management plans, it clearly recognises waste prevention as a distinct and essential area of policy requiring targeted objectives and measures.

Northern Ireland has reflected this by publishing a standalone Waste Prevention Programme, recognising that effective prevention requires specific actions, governance arrangements and accountability mechanisms distinct from broader waste management functions. Integrating the Waste Prevention Programme into the wider Resources and Waste Management Strategy risks reducing its visibility, with recycling and end-of-pipe waste management priorities likely to dominate within a broader strategic document. It may also make it more difficult for communities, businesses and stakeholders to identify and engage directly with waste prevention commitments.

As waste prevention sits at the top of the waste hierarchy, it requires a distinct policy identity rather than being embedded within a broader waste management strategy focused primarily on managing waste once

it has been generated. Many prevention-focused interventions such as behaviour change, reuse, repair, product design and producer responsibility also extend beyond traditional waste management functions and require cross-government coordination.

We strongly urge DAERA to retain the Waste Prevention Programme as a standalone document with its own objectives, delivery framework, performance indicators and review cycle. This would preserve the visibility of waste prevention, strengthen accountability for delivery, and ensure sustained policy focus on preventing waste at source rather than managing its consequences.