



Resource Opportunity Consultation
Waste Policy and Resource Efficiency Section
Department of Environment
Community and Local Government
Newtown Road
Wexford
Y35AP90

26th February 2016

Re: Resource Opportunity Consultation

Dear Sir/Madam,

The Irish Waste Management Association (IWMA) offers the following response to the current consultation on waste policy in Ireland.

About the IWMA

The IWMA is comprised of 37 Member Companies that are each engaged in managing waste in Ireland. Our members' employ more than 4,300 people directly and support many other jobs indirectly. Their activities cover the following areas of waste management:

- waste collection,
- pre-treatment & transfer,
- materials recycling,
- composting,
- bioenergy / anaerobic digestion,
- waste to energy / incineration,
- hazardous waste management,
- Healthcare waste management and
- landfill disposal.

Our members collect 75% of the household waste currently managed in Ireland and the vast bulk of the commercial, industrial and hazardous wastes.

Our members processed approximately 3.5 million tonnes of waste at our 66 non-hazardous and 11 hazardous waste facilities in 2013. The bulk of this waste was recycled or otherwise

recovered. All our member's facilities are either licensed by the EPA or operated under a local authority permit.

It is clear that the IWMA represents a broad spectrum of commercial interests in waste management, so we are not biased in any way towards or against different methods or technologies in managing waste. We support the movement of waste up the hierarchy and recognise the many requirements of Irish National Policy, EU Directives and the emerging Circular Economy proposals. It is in all our interests that waste is managed successfully in Ireland and we hope that our responses to your consultation are helpful in achieving that goal.

Response to Questions Posed in the Consultation Document

Landfilling and the Landfill Levy:

1. Consider whether to increase the landfill levy.

The landfill levy has served its purpose in diverting waste from landfill to the next tier in the waste hierarchy, including Waste to Energy (WtE), to the extent whereby Ireland is now compliant with the Landfill Directive targets for diversion of Biodegradable Municipal Waste (BMW) from landfill. As there is insufficient WtE infrastructure currently available in Ireland, a further increase in the landfill levy at this time is not warranted and could result in increased costs for householders, businesses and industry, without achieving further environmental benefits. This could have a negative impact on employment in Ireland.

We expect that landfill reliance will be further reduced as additional indigenous WtE infrastructure develops at competitive gate fees. The landfill levy should be reviewed periodically as more WtE infrastructure comes on stream and as the Circular Economy proposals develop.

2. Consider increasing the landfill levy on Biodegradable Municipal Waste (BMW) and reducing the levy on inert waste.

Ireland is currently exceeding the Landfill Directive target for diversion of BMW from landfill and we expect that the development of new WtE infrastructure that is currently under construction will further reduce the amount of BMW landfilled. We therefore see no merit in applying variable landfill levies at this time. This would lead to additional bureaucracy, testing and verification that would add costs unnecessarily to waste management in Ireland.

Inert waste is rarely disposed in landfills and is suitable for backfill operations such as quarry restoration, so a landfill levy exemption could result in unnecessary disposal of waste that, by its nature, is recoverable. We therefore do not support such an exemption.

3. Consider introducing landfill bans on certain types of recyclable materials.

A number of materials have already been banned from landfill under EU Law, including tyres, plasterboard, WEEE and batteries. Producer responsibility schemes have been formed to address the best treatment options for these particular materials. Further landfill bans are possible under future EU Law so it is important that Ireland's policy is consistent with the EU's plans.

Banning materials such as biodegradable waste, food waste, glass, paper, metal, plastic, beverage containers, textiles, books, etc, is not a practical option. These items are commonplace in residual waste bins and it is not possible for waste collectors to extract all of them prior to landfilling. That would be equivalent to banning landfill altogether, which is not required by EU Law and not in Ireland's interest. The new waste collection regulations will act as an incentive for householders to put recyclable items in recycling bins and food waste into the biowaste bins. Such fiscal incentives are more appropriate than landfill bans in our view.

We also suggest that bulky items should not be banned from landfill unless there are specific schemes set up that manage any such materials in a sustainable cost effective and accountable way. Otherwise, there is a danger that non-regulated rogue operators will collect these materials cheaply and dispose of them by fly-tipping. This would be an unintended consequence that would be a lot worse than landfill disposal.

Waste Product Quality Standards:

4. Explore how technical standards for a wider range of waste streams could be determined.

5. Consider reclassifying higher-value commodity materials currently classified as waste through the development of quality protocols to encourage their marketability.

Questions 4 and 5 are somewhat related so we offer a single response to the two questions here.

Setting quality standards or technical standards is desirable where it increases the markets for particular materials, but unintended consequences can occur where standards are set that increase costs of production without increasing the available markets.

The introduction of rules and regulations with regard to 'End of Waste' (EoW) in the 2008 revision of the Waste Framework Directive has caused some difficulty for recycling in Ireland. In particular, the use of aggregates, glass and woodchip as products has become difficult because EoW status has not been developed for these materials.

EU Member States that have developed their own technical standards and EoW status for these materials have an advantage in this regard, so we would very much support development of technical standards and EoW status for these particular waste types as a priority. This could open the way for local enterprises with innovative recycling ideas using these materials, as well as supporting the use of these materials in developments in a way that displaces the use of raw materials.

Paper, plastics and metals are traded internationally and have well established markets, so developing technical standards and EoW for these materials is less of a priority. Paper mills, metal smelters and plastic recyclers set the standards that they require and the waste industry must comply with those standards. Similarly, cement kilns set standards for SRF that waste companies must comply with for the material to be accepted as a fuel.

We therefore suggest that any policy involving technical standards and/or EoW status should be developed in close consultation with the waste industry to ensure a beneficial outcome.

6. Consider pre-treating waste for export to at least the same standard as UK Refuse-Derived Fuel (RDF) exports.

There is currently a shortfall in residual waste treatment capacity in Ireland and the export option is critical, so at this time any interference with the export market is likely to have a negative impact on our members' ability to manage waste effectively.

Producing RDF normally requires the extraction of organic fines that by their nature have high moisture content. These fines are stabilised at biological treatment plants and the resulting stabilised biowaste is sent to landfill for recovery (daily cover) or disposal. There is currently limited available capacity at biological treatment plants and a shortfall in available capacity at landfills, so converting MSW exports into RDF is not an option at this time.

This situation should be reviewed periodically as more indigenous infrastructure becomes available and sufficient residual waste recovery capacity is established across the State.

Policy Certainty, Information and Data:

7. Consider development of a waste management infrastructure planning portal (similar to UK) to allow visibility to developers and investors of planned capacity.

Yes, we believe that such a portal is essential to inform planning decisions. There should be a mechanism whereby new information can be regularly supplied to update this information.

8. Consider how to ensure continuing policy certainty in the waste management sphere.

The IWMA views in this regard are encompassed below in our answer to Question 20.

9. Explore whether Regional Waste Management authorities could collate data on facility capacity and utilization, and treatment types from all waste management facilities on a quarterly basis to ensure current capacity information is available to market participants and policy makers.

We suggest that this should be encompassed in the planning portal discussed in question 7 above. We previously argued that the capacity analyses presented in the regional waste management plans was not transparent and was not reflective of the situation on the ground. We need transparency in this regard.

10. Explore whether the Trans-frontier Shipment Office could provide data on export volumes and export types on a quarterly basis to allow early identification of new export trends.

Yes, we think that this should be feasible on a quarterly basis. It would also be useful if the NTFSO provided the raw data as a pivot table whereby it would be easier to extract particular datasets from the full dataset.

The Role of Citizens:

11. Consider how community buy-in can be improved to facilitate the proper development of waste treatment infrastructure.

We suggest that community buy-in is project specific for waste treatment infrastructure. We have had some recent examples of large infrastructure projects acquiring planning consent

with little or no objection. In these cases, the sites were well chosen and the developer engaged meaningfully with the local community and committed at an early stage to community gain projects, based on local needs. We do not believe that one approach would fit all circumstances, so a single 'fix all' solution may not be effective in this regard.

12. Explore introducing a consumer information label for products to signify domestic treatment of any waste arising in the product's manufacture.

No comment.

Training for Enterprise:

13. Consider the development of a training programme for entrepreneurs and SMEs in the Waste and Materials Recycling industries to encourage new entrants to the market and enable existing market participants to expand.

We support this idea as the sector is governed by complex legislation that entrepreneurs may struggle with.

Interventions, Targets and Incentives:

14. Consider introducing specific and accountable targets for pre-treatment (as a proportion of household waste) for waste collectors.

We suggest that this may be worth monitoring, but introducing specific targets would be unfair as there are many factors such as urban / rural collections as well as the education and social circumstances of the collector's customers. By monitoring this data, the regional authorities could see where their attention should be focussed in educating customers on waste prevention and better segregation.

The new regulations on pay by weight will incentivise better segregation and waste prevention. We suggest that monitoring the impact of the new waste collection system should be the first priority in this regard. If Ireland is at risk of missing future EU targets for prevention, recycling, biowaste, etc, despite the introduction of the new system, then further measures should be considered including a closer look at areas that are performing below the national average.

15. Consider whether incentives to support the provision of feedstock on a commercial basis to private waste facilities should be introduced.

The IWMA supports fiscal measures that encourage waste to higher tiers in the waste hierarchy without impacting on fair competition at each tier. Examples of this include the landfill levy, the REPAK packaging recycling subsidy and the differential pay by weight charges applied to householders under the new waste collection regulations.

Incentives relating to individual facilities or technologies are likely to skew competition, so we do not support such measures.

16. Review TFS charges to ensure consistency across the waste spectrum.

The IWMA is opposed to higher or increased TFS charges as these would increase costs for Irish Industry and potentially have a negative impact on Irish competitiveness.

The different TFS charges are relevant to categories of TFS movements, which are split between bulk shipments and truck movements (transport containers / units). As recognised by the NTFISO, each bulk shipment of c.3,000 tonnes replaces c.125 truck movements. The administrative burden is far less for bulk shipments and this should continue to be reflected in the fee structure.

However, we question the appropriateness of the 1,000 tonne daily threshold as the measure of a bulk shipment. A bulk shipment may take 2 to 3 days to load, so perhaps the threshold could be revised in a way that captures all bulk shipments, even if less than 1,000 tonnes is loaded in any particular 24 hour period.

The IWMA would welcome the opportunity to be part of a consultation or working group should any changes in TFS charges be contemplated.

Strategic Issues:

[17. Consider integrating domestic waste recovery plans within other national initiatives such as Harvest 2020.](#)

No Comment.

[18. Examine the value of setting up an Irish organisation similar to the UK's WRAP.](#)

WRAP is successful as it well funded and works close to industry to address issues of importance to waste management in the UK. Funding of an Irish version of WRAP would be difficult in Ireland's much smaller economy with less available funding for such organisations.

RX3 focussed on recycling of paper, plastic and biowaste. There was no consultation with the waste industry on that project until it was well underway or complete. We would have preferred if the project was focussed on materials that our members are struggling to find outlets for, e.g. aggregates, woodchip, glass, C&D fines, etc. Such outlets should be in Ireland as these materials are not traded on international markets and EoW status is key to establishing markets.

Paper has a well established international market and RX3's work was never likely to impact on the status quo in that regard. There was some merit in analysing the plastics market as there are opportunities for local plastic recycling. Biowaste analysis also had merit as this is managed within the State and quality of the product is key to establishing good outlets.

Should the DECLG decide to set up and fund an organisation similar to WRAP, we believe it is imperative that the IWMA is involved at the outset, as industry involvement and support is a critical factor in the success of WRAP.

[19. Consider whether public procurement contracts should specify greener cement.](#)

The IWMA supports public procurement of all materials that are recycled or recovered by the waste industry in Ireland. In particular, we see that there are opportunities for public procurement of aggregates, woodchip and compost. This is an excellent pull measures that adds value to recycled materials and pulls them up the waste hierarchy.

The term 'greener cement' is not clear to us, so it is difficult to comment on that particular product. We certainly support the use of SRF in cement kilns in Ireland and if the rate of

substitution of fossil fuels with SRF in Irish cement kilns is the relevant measure of 'greener cement', then we support public procurement of that product.

20. Consider what other policy or practical interventions, collaborations or alternative approaches might assist in Ireland's effort to become more resource efficient?

Having reviewed the consultation paper, we are somewhat critical of the focus of the document on the export of waste, as evident in the title. Earlier consultation with the IWMA would have been welcome and may have helped in steering the consultation towards the significant issues at hand, such as achieving higher recycling rates. The various versions of the Circular Economy proposals each pointed to recycling levels well in excess of our current performance and that is a critical issue in our view. The consultation paper does not address this point.

Exporting recyclables generates significant revenue in the same way as exporting products generates revenue for Irish companies. This has a positive impact on Ireland's economy and on job creation in Ireland and should not be seen in a negative light. Recyclables are traded on a global market and the Irish market is clearly too small to support some recycling infrastructure, as demonstrated in recent history with the closure of the Smurfit Paper mill, the Irish Glass Bottling plant and the Irish steel mill.

Exporting residual waste is a short term step in our progression up the waste hierarchy away from our historical over-reliance on landfill disposal. The recent significant increases in the landfill levy to €75 per tonne have been successful in pushing waste out of landfill towards Waste to Energy (WtE). However, Ireland currently has insufficient WtE capacity to treat this residual waste, so export has filled that gap in the short term and has demonstrated that there is feedstock available for future indigenous WtE plants.

The Dublin Waste to Energy plant at Poolbeg is now under construction and is expected to be operating on a commercial basis by mid-2017, with an available capacity of 600,000 t/a. This will undoubtedly displace the export option to a large extent. An additional application for planning consent to develop a new WtE facility in Cork has recently been lodged and if successfully developed that facility would further displace export and/or landfill disposal. At that point export of residual waste is likely to be minimal. We expect that landfill will remain available in future years for materials that are not suitable for WtE such as bulky waste, C&D fines, stabilised biowaste, etc, but it should reduce to a level where it is used to treat less than 10% of our municipal waste, in line with the new Circular Economy proposals.

Municipal waste management in Ireland is currently undergoing significant change with the introduction of food waste regulations and pay by weight regulations. We expect these new developments to result in reduced waste volumes and the movement of waste up the hierarchy as householders are incentivised to source segregate for recycling and to consequently generate less residual waste. These measures will be subject to periodic review and their success will be measured in time.

Where there is an open market for waste collection and waste management, such as in Ireland, we suggest that utilisation of fiscal measures is the best way to influence the behaviour of waste producers and waste management companies in a manner that improves the environmental performance of the State.

Examples of successful fiscal measures currently employed in Ireland include:

- the landfill levy
- the packaging waste recycling subsidy scheme
- differential prices charged for collection of recyclables versus collection of residual waste (both household and commercial)

These measures must be carefully employed to encourage better environmental behaviour without encouraging illegal behaviour such as illegal dumping or burning of waste. Restrictions on outlets or bans on certain treatments of certain materials can have unintended consequences that ultimately lead to environmental pollution, so in general, the IWMA does not support measures of that nature. Carefully selected fiscal measures that encourage waste to higher tiers in the waste hierarchy without encouraging criminal behaviour and without skewing competition between facilities that are on the same level of the hierarchy, is our preference.

Education of the public is also a critical factor in waste policy. New rules on waste collection are not always popular with the public, particularly if the public is not informed about the environmental benefits of such new measures. For example, many householders do not want to use a brown bin and do not want to be charged a variable rate for waste collection, so it is important for them to understand the environmental significance of such measures and the consequences for the country and the environment if waste is not managed in this way.

Whilst waste management companies will inform customers directly, we suggest that the State institutions have a significant role in educating the public on the new rules. A National campaign of education and awareness is needed over the next 6 months to assist with the transition to the new system and to explain to the public the environmental benefits that are expected to arise from the new legislation.

Enforcement is equally important in this context. Those that comply with the new regulations must not be put at a disadvantage when compared with those that engage in criminal activity. This can occur at the household level as well as at the collector level.

We hope that this submission is helpful to the process and we are available for further consultation or clarifications.

Yours Sincerely,



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IWMA Secretary

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