

Mr. Eoin Deegan
Department Communications, Climate Action and Environment,
Newtown Road,
Carricklawn,
Wexford.

2nd May 2019

Re: Commercial Waste and Apartment Waste Policy

Dear Eoin,

At our meeting on 24th January, we discussed future recycling targets for MSW and in that context, we agreed that there is much room for improvement in recycling apartment waste and commercial waste. Our members are finding that mixed recyclable bins at apartments and at commercial premises are often heavily contaminated and unsuitable for recycling. We are also finding that some commercial premises and many apartment dwellers are placing large amounts of food waste in residual waste bins, when this waste should be source segregated in brown bins.

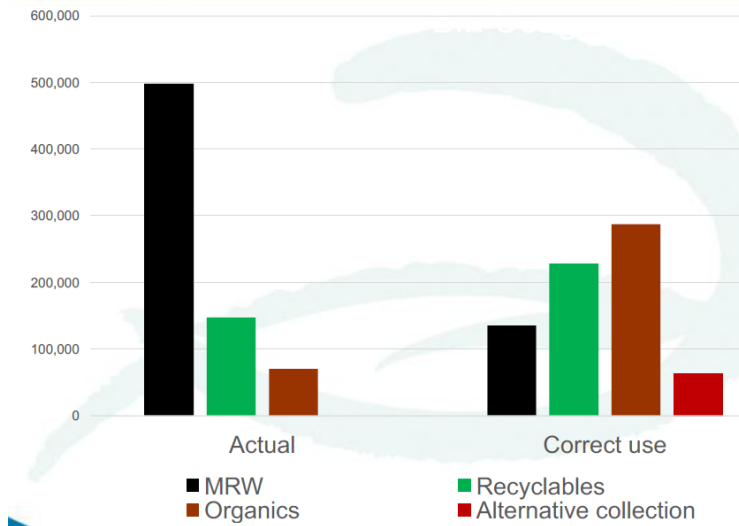
The recent waste characterisation studies carried out for the EPA have confirmed that commercial waste is poorly presented with a lot of waste placed in inappropriate bins. The following two slides from an EPA presentation at last November's Irish Waste Management conference clearly illustrate the extent of the problem:

Non Household Kerbside

GENERAL WASTE



Non Household Bin Usage



The EPA found that more about 73% of the materials in the commercial residual waste bin should not be there – they should be recycled. This figure is 35% for the household residual bin, so greater awareness and incentivisation is clearly needed in the management of commercial waste as a priority.

It was suggested at our meeting that a forum might be set up with relevant stakeholders to address these areas of concern. This forum might consider potential legislative changes, incentivised charging, enforcement, awareness campaigns and other ideas to increase recycling of apartment and commercial wastes.

It may be necessary to establish two groups of stakeholders for these discussions or a single group broken into two subgroups. One group/subgroup would work on apartment waste and the second group/subgroup would work on commercial waste. We will respect your decision in that regard.

We recommend that the following groups are invited to partake as stakeholders. We suggest that each organisation should be restricted to the number of representatives indicated below, but we will respect your decision on this:

- DCCAE (3 or 4)
- EPA (1)
- Regional Planners (3)
- WERLAs (3)
- IWMA (4)
- CIWM (1)
- Cré (1)
- REPAK (1)
- IBEC (1)
- SFA (part of IBEC) (1)
- ISME (1)
- Apartment Owners Network (1)
- Irish Property Owners Association (1)
- Property Management Group affiliated to The Society of Chartered Surveyors Ireland (1)
- Local Authority Social Housing Section (1)

In our view, the forum should be managed by the DCCAE. The IWMA can assist with venues for meetings if you wish.

We look forward to hearing back from you on this subject.

Yours Sincerely,

A handwritten signature in black ink that reads "Conor Walsh". The signature is written in a cursive, flowing style.

Conor Walsh
IWMA Secretary

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