



Mr. Kevin O'Donoghue
Department Communications, Climate Action and Environment,
Newtown Road,
Carricklawn,
Wexford.

10th September 2019

Re: Commercial Waste Policy

Dear Kevin,

At our meeting on 7th August 2019, we discussed future recycling targets for MSW and in that context, we agreed that there is much room for improvement in recycling commercial waste. Our members are finding that mixed recyclable bins at commercial premises are often heavily contaminated and unsuitable for recycling. We are also finding that some commercial premises are placing large amounts of food waste in residual waste bins, when this waste should be source segregated in brown bins.

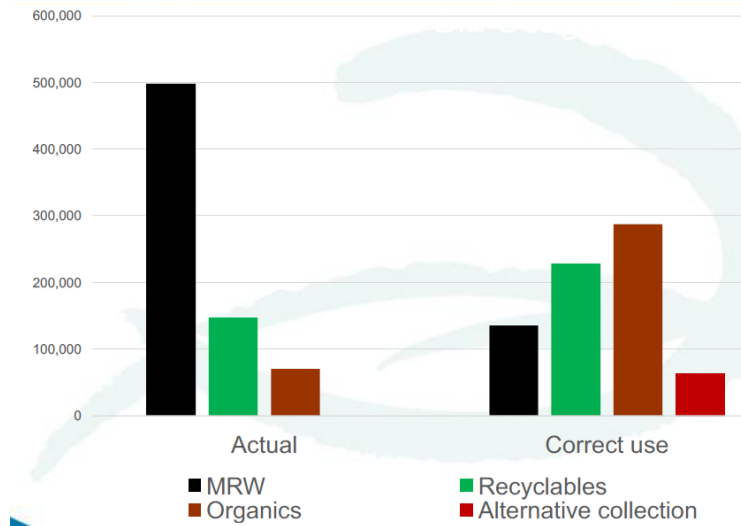
The recent waste characterisation studies carried out for the EPA have confirmed that commercial waste is poorly presented with a lot of waste placed in inappropriate bins. The following two slides from an EPA presentation at last November's Irish Waste Management conference clearly illustrate the extent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

We have consulted with our members on this issue and we recommend the following actions to improve recycling performance from the commercial waste stream:

1. Introduce mandatory charging per kilo for all commercial wastes.
2. Introduce mandatory incentivised charging whereby recycled wastes (including brown bins) have a lower per kilo charge compared with residual wastes.
3. Introduce a ban on placing food waste, garden waste and recyclable wastes in residual waste bins at commercial premises.
4. Consider the introduction of mandatory material separation for different types of commercial premises. For example, wastes generated at offices should have separate paper bins, whereas a distribution warehouse should have separate collection of cardboard, pallet wrap, pallets, etc. The work carried out by The Clean Technology Centre for the EPA Waste Characterisation study should assist in this regard.
5. Commence and properly fund a strong awareness campaign to inform business owners and the general public of their waste management obligations at home and at work.
6. Encourage and fund enforcement of these obligations.
7. Consider the introduction of a Recycling Performance Rating Scheme for businesses, perhaps along the lines of Building Energy Rating (BER) scheme or another appropriate certification scheme. Independent assessors could rate the recycling performance of businesses using unannounced spot checks. The resultant rating or certification could be sought in tenders and could be used by these businesses in their Environmental Policies, Environmental Management Systems and/or Annual Reports.

It could be a voluntary scheme, so long as there are some advantages to businesses that partake and perform well in the scheme, such as extra points in tenders and/or marketing advantages.

We look forward to meeting you at the High Level Forum in the IMI next Monday, where we should get the opportunity to further explore this and other areas of interest.

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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