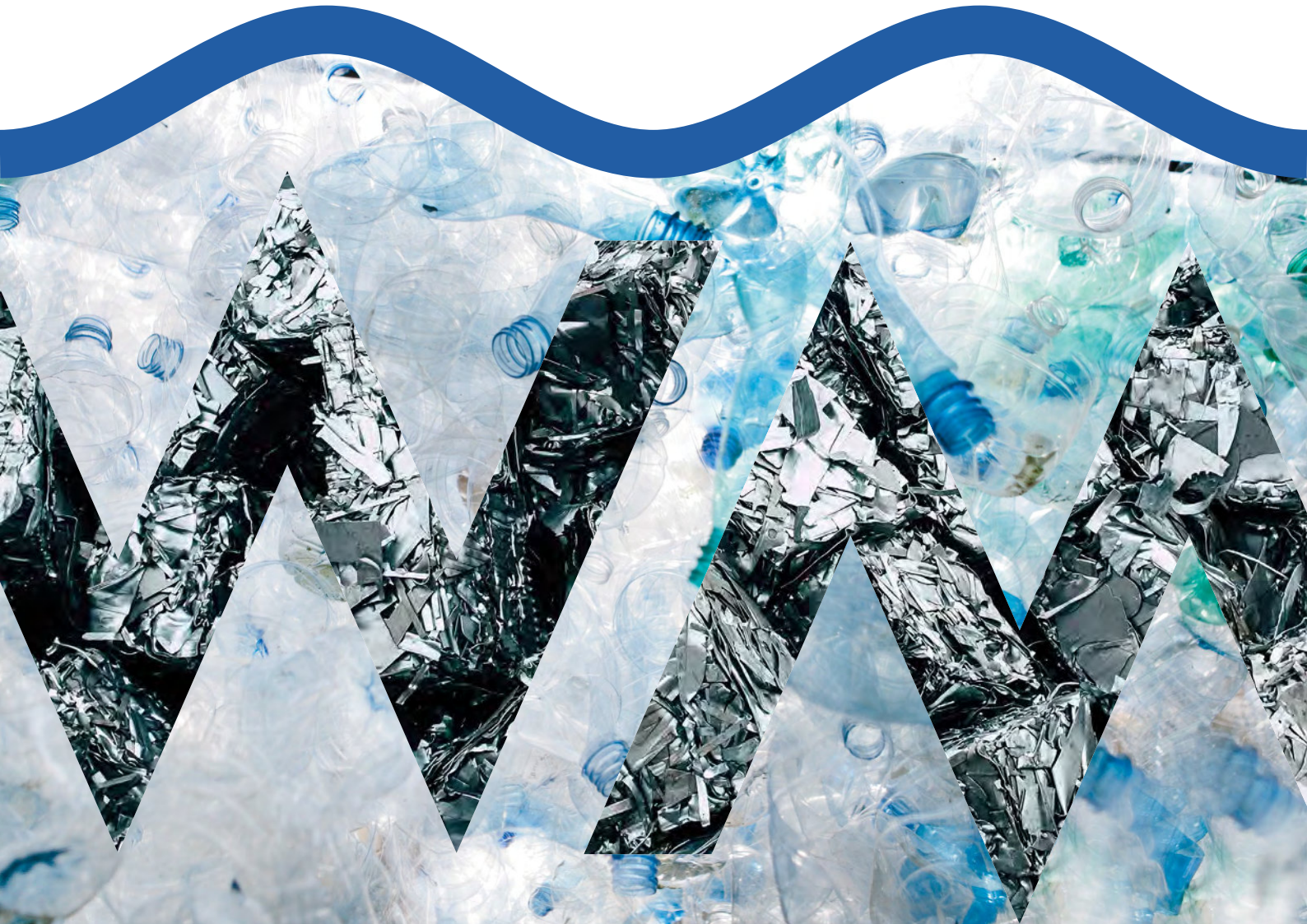


IWMA Recommendations on Waste Policy **2019**



Background

The Irish waste market has gone through significant change over the last 15 years or so. The market has transitioned from being dominated by the public sector to almost exclusively private sector. There has also been significant uncertainty around Government policy for the waste sector over much of this period. Government policy and legislation since 2012 and the removal of local authority interests in waste collection, have combined to bring more certainty to the market.

The market is dynamic and waste companies can respond quickly to changes in the market and to opportunities. The increase in the landfill levy from €15 per tonne in 2007 to €75 per tonne in 2013 had the desired impact of driving waste up the waste hierarchy from landfill disposal to recycling and recovery (including energy recovery).

A recent report that was commissioned by the IWMA and prepared by SLR Consulting, compared the costs of household waste collection across Europe and found that the prices in Ireland compare favourably when compared with other countries that have similar demographics and similar levels of environmental performance. That report also concluded that the average price for kerbside household waste collection in Ireland is currently about €100 per year lower now than in 2004/2005, when the market was dominated by local authority waste collections.

Ireland currently has a very high level of compliance with the targets set in the various

EU Directives on waste. However, the IWMA has concerns regarding a number of serious challenges that lie ahead and we offer the following comments and recommendations, with a view to a constructive interaction with policy-makers to address these pressing needs.

The main challenges that we highlight at this time are as follows:

1. The apparent stagnation in recycling levels between 40 and 42% for the last 6 years, which suggests that future EU targets of 50% recycling by 2020, 55% by 2025, 60% by 2030 and 65% by 2035 will be even more challenging than previously envisaged.
2. The increasing quantities of non-recyclable plastics in the Irish market and the blunt EU instruments that demand maximum recycling of plastics, without differentiating between those that can be recycled and those that cannot (for technical or economic reasons).
3. The continued operation of rogue operators in the sector, particularly in the skip business and the alleged interaction between such rogue operators and criminal gangs.
4. The number of houses that refuse to avail of a waste collection service (c.300,000) and the unauthorised waste activities that arises from some people that do not avail of an authorised waste collection service.



Recommended Solutions



Issue 1.

Increasing Recycling Rates

IWMA members continue to roll-out brown bins to agglomerations of 500 people or more and this is having a positive impact on municipal waste recycling rates. Our members have also introduced incentivised charging to all household customers in Ireland, so that waste prevention and recycling is financially incentivised.

However, waste collectors alone cannot raise recycling rates to 65% from the current c.42% rate. The IWMA offers a number of recommendations here that we believe should be considered by the policy-makers.

- 1. Increasing Public Awareness.** It is clear from Municipal Waste Characterisation data produced in 2017 and 2018 by both REPAK and the EPA, that the residual waste bins in Ireland contain high levels of recyclable materials. The data also shows that the recycling bins contain high levels of residual waste. This is true of both household waste and commercial waste. Strong messages are needed to raise greater awareness of recycling in Ireland and to appeal to the public to make greater efforts in this area.

The Government has made available a relatively modest budget (c.€1.5 million/annum) that is being used by the Regional Planners to good effect to help educate the public on how best to recycle. We believe that this budget needs to be increased substantially if it is to hammer home the key messages with regard to recycling. A national Radio and TV campaign is needed in our view, with a similar profile to the Road Safety campaign, which we understand has an annual budget of €4 to €5 million.

We recommend that this this level of budget would be a good investment if Ireland is to become a real recycling society and if we are to meet our future EU obligations and avoid massive fines, as well as avoiding reputational damage to the Irish State.

- 2. Incentivised Charging.** All households in Ireland with a kerbside collection service are charged in a way that financially incentivises waste prevention, re-use and recycling. Some charging structures are more incentivised than others and while we accept that one size does not fit all, we recommend that the enforcement authorities review the charges offered and weed out those charging systems that provide too little incentive.

We also recommend that mandatory incentivised charging is extended to commercial waste collection. There is merit in considering pay by weight systems for commercial wastes, as currently residual waste is generally charged by volume and can be cheaper per kilo when compared to brown bin waste. In this scenario, there can be a financial disincentive to have and to use brown bins.

There are also claims that some commercial premises use only one bin for their waste, with no source segregation whatsoever. This should not be allowed to occur.

These areas require analysis, enforcement and engagement with relevant stakeholders to increase recycling rates for commercial wastes.



- 3. Brown Bin Roll-Out.** The EPA has estimated that the amount of brown bins rolled out to households in Ireland increased from 572,000 in 2015 to 640,000 in 2016. The roll-out continued in 2017 and 2018 and is strongly supported by the IWMA. It was estimated in the Regulatory Impact Assessment that preceded the 2013 Food and Biowaste Regulations that two-thirds of the population of Ireland live in agglomerations of 500 people or more and will have access to food waste collections when the system is fully rolled out.

We believe that extending the roll-out to all rural areas is likely to produce a diminished return and may be too costly to be supported by the public. We fear that associated price increases in rural areas could lead to more people opting out of participation in kerbside household waste collection, so the initiative may have a very negative environmental impact.

For these reasons, the IWMA recommends that a programme to promote home composting in rural areas should be developed with adequate available resources. Local authorities and waste collectors could provide the bins and supporting information at a reasonable cost or even at a rate subsidised by the Environment Fund.

We also consider that a strong emphasis is now needed on capturing food waste from commercial premises. Legislation is in place, but incentivisation, awareness and enforcement appear to be falling short of what is needed to increase recycling performance in this context.

- 4. Waste Collector Engagement with Customers.** The IWMA will encourage its members and other waste collectors to be more proactive in informing customers on how to recycle better, including policing methods when customers fail to source segregate wastes. There needs to be a much stronger approach to customers that consistently present contaminated recyclables and consistently turn good recyclable materials into residual wastes.

- 5. Apartment Waste.** Waste collected from apartments in Ireland is generally very poorly sorted and is not a good contributor to recycling rates. Ireland has one of the lowest rates of apartment dwelling in Europe at 7.3%, but this is likely to increase towards the European average of 41.8% in future years. That could have a negative impact on recycling rates unless it is tackled now.

We note that draft bye-laws issued by the local authorities provide requirements for source segregation in apartment complexes as well as in individual apartments and we welcome that as a first step.

In The Netherlands, a system of collecting dry recyclables from outside the door of each apartment is proving effective. The apartment caretaker collects single stream recyclables on a daily basis in a trolley and delivers them to single stream bins in the waste storage area. Each apartment has separate boxes for single stream wastes such as paper/card, metal cans, plastic bottles and glass bottles/jars.

Residual waste must be delivered by the apartment dweller to the waste storage area, so there is an incentive to minimise residual waste, which is less convenient to handle compared with placing recyclables outside the apartment door on designated days. There is very good quality control on the recyclables as the caretaker will only collect single stream waste and there is visibility at each apartment door, which is currently lacking in existing collection systems at apartment blocks in Ireland.

Given the nature of food waste, we expect that this should also be delivered to brown bins in the waste storage area, rather than being collected at the apartment door.

There is a cost associated with providing this service, but this can be covered by a combination of reduced waste collection charges for lower levels of residual wastes and a higher value for good quality materials source segregated for recycling. A single caretaker could probably service a number of apartment blocks and could trade the recyclable commodities to get the best available return, so we expect that this sort of initiative could pay for itself to a large extent.



6. Deposit and Refund Schemes at Major Events.

We recommend that it should be mandatory for all festivals, concerts, matches and other major public events to only supply beverages on a deposit and refund basis. This can be controlled through the existing system of licensing events. Charging a €1 deposit on rigid plastic cups that can be washed and re-used on site is very effective and saves large scale wastage of single use plastic containers.

Photo (to the right) shows the rigid plastic reusable cups (pint glasses) provided recently at a Rugby match in France where the lack of litter and lack of over-flowing bins was particularly noticeable. All drinks, including hot drinks were served in this type of reusable plastic cup and all attracted a €1 deposit, regardless of size.



- ## 7. Public Space Recycling.
- There is a lack of recycling facilities in streets and public spaces in Ireland. We believe that this sends a negative message to the public that it is OK to mix wastes. With greater public awareness and some innovative thinking, we expect that public space recycling could be improved greatly, even if it is just a two bin system (dry recyclables and residual waste). The use of different colours and shaped openings can make it obvious to the public that they should put recyclables in the recycling bins. Simple and consistent messages would help.

International experiences should be reviewed and considered in this context.



Issue 2.

Non-Recyclable Plastics

The legislation that is expected to follow on from the agreed EU Circular Economy Package will demand high recycling rates for plastics, without differentiating between those that are recyclable and those that are non-recyclable (technically and economically).

Plastic bottles, pots, tubs and trays are generally recyclable and can be processed in Ireland and neighbouring countries. Mixed plastic films and composite plastics are non-recyclable for either technical or economic reasons. Sending these wastes to the Far-East to be recycled at a high cost is not a good environmental option and is likely to lead to some leakage of plastics into the world's oceans.

We consider that Irish Waste Management Policy should encourage the use of such non-recyclable plastics in the manufacture of Solid Recovered Fuel which is used by cement kilns to displace coal and pet-coke. As Ireland does not produce coal or pet-coke, we rely on imports of these fossil fuels. Producing greater quantities of SRF from non-recyclable plastics has both environmental and economic benefits for Ireland and will reduce the amount of plastics that end up in the world's oceans.

We recommend that the Irish State lobbies the EU to differentiate between recyclable and non-recyclable plastics when setting recycling targets. For example, high recycling targets should be set for PET and HDPE bottles, but some other plastics, such as post-consumer plastic films, should be subject to a recovery target, rather than a recycling target. Recovery includes use as a fuel, so replacing coal and pet-coke with waste-derived SRF would be encouraged in that scenario.



Solid Recovered Fuel Produced in Ireland

Issue 3

Rogue Operators and Criminal Gangs

The IWMA calls for the establishment of an Environmental Crime Unit to address the serious criminals and crime gangs that are active in burning and illegally dumping waste. We believe that these serious criminals are being supplied with waste by rogue waste collectors and rogue skip operators. The Environmental Crime Unit could be a small unit consisting of armed detectives, waste management enforcement personnel and forensic accountants.

We understand the dangers associated with local authority and EPA personnel tackling serious criminals, so we believe that this requires the involvement of trained and armed Gardaí with the technical back-up of waste management experts and others. We also recognise that this is not a 9 to 5, Monday to Friday job, as the criminal activities in the waste sector normally occur outside of office hours.

Issue 4

Houses Refusing to Avail of a Waste Collection Service

The waste industry collects kerbside household waste from 1.2 million houses in Ireland. There are an additional 300,000 to 400,000 occupied houses that do not avail of a waste collection service. The IWMA believes that the vast majority of these houses have access to at least one waste collection service and in many cases, they have access to several waste collection services.

A 2014 survey by the CSO, which sampled 13,000 households, concluded the following:

Household's main method for disposing of non-recyclable household waste

- *A wheelie bin collection service was used by 80% of households to dispose of non-recyclable household waste.*
- *Another 8% of households brought their non-recyclable household waste to a recycling centre*
- *4% of households shared a bin with another household such as a neighbour, relative or friend - in one-person households, where the person was aged 65 and over, the rate for sharing was 12%.*
- *Apartment dwellers were also more likely to share a bin (18% of apartments).*



- *Dublin and the Mid-East had the highest percentage of wheelie bin use at 86%.*
- *Rural households made much more use of recycling centres (18% of rural households) compared with 3% of urban households.*

"Household's main method for disposing of recyclable household waste

- *The most popular method of disposing of recyclable waste was through a wheelie bin service with 76% of households using this method.*
- *The second most popular method was to bring this waste to a recycling centre (12%).*
- *There was a clear urban/rural divide with 24% of rural households bringing the recyclable waste to a recycling centre compared with 6% of urban households.*
- *2% of households did not recycle waste."*

The IWMA believes that some of these householders also engage in illegal activities such as fly-tipping and backyard burning. A CSO survey would not necessarily reveal such activities. In 2015, the Regional Waste Management Plans recognised the need to address unmanaged household waste and the resulting impacts on the environment and human health (Policy G.4). The IWMA fully supports that policy and we suggest that a greater level of participation in kerbside household waste collection services is the best way to address these issues.

The local authorities are currently in the consultation phase of introducing new Bye-Laws that will give authorised officers the power to seek information and receipts from householders that do not avail of a waste collection service, to ensure that they are not engaged in illegal activities. The implementation of these Bye-Laws will require resources. The IWMA members that collect household waste will give consideration to providing financial support to ensure that these resources are made available and we will encourage other large players in the market to also get involved in such a scheme.

We recommend the following idea for consideration, initially on a pilot scale, to be scaled up if successful:

- On a county by county basis, waste collectors could pay a voluntary contribution to a ring-fenced fund that would pay for door-to-door enforcement officers.
- The local authority would be asked to match that amount and put it into the ring-fenced fund.



- The authorised officers could be new local authority personnel or could be hired under a contract with a private company to go door-to-door checking for the relevant information. The merits of each option should be considered and costed.
- The IWMA members would provide information to the local authorities on households with a kerbside collection service, so that those without a service can be identified and targeted. The use of Eircodes would be beneficial to this exercise.
- People using Civic Amenity Sites for disposal of residual household waste, mixed dry recyclables and/or food waste, should be registered with the local authority, including details of their Eircode, so the local authorities can identify those that are managing their household waste legally at those sites.
- In advance of door-to-door inspections, the enforcement team should carry out relevant desk based checking and communications in order to target the most effective fieldwork and maximise the benefit from the use of the limited resources available.
- A review of the pilot scale exercise would be required to see if the returns are worth the investment and could be scaled up or down on that basis. Door-to-door engagement can also be very good for public awareness of waste management issues.



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