



National Waste Plan Pre-Draft Consultation,

By email only to [info@srwmo.ie](mailto:info@srwmo.ie)

6<sup>th</sup> May 2021

**Re: Pre-Draft Consultation on the National Waste Plan**

Dear Sir/Madam,

Further to your call for consultation on the above-referenced subject, I offer the following responses and comments on behalf of the Irish waste Management Association (IWMA). The IWMA is comprised of 42 members that operate 50 waste companies, as shown below:



Our website, [www.iwma.ie](http://www.iwma.ie), provides details of our members. Note that some members have acquired other companies in recent years and therefore trade under several brand names.

Our members handle household, commercial, C&D, liquid and hazardous wastes and are involved in the following waste management activities:

- Waste Collection
- Waste Transfer
- Recycling Operations
- Composting
- Anaerobic Digestion
- Hazardous Waste Management
- Specialist Treatments (such as Sterilisation)
- Soil Treatment and Recovery
- Waste to Energy
- SRF Production
- Landfill Operations
- Export of Waste for Treatment Abroad

It is clear that the IWMA represents a broad spectrum of waste management activities, so we have no inherent bias towards or against any particular waste management options. Our main goals are to raise standards in the industry, to promote compliance with all legislation and to assist Ireland in meeting the targets set by the EU in a variety of Directives. All our submissions are available publicly on our website.

#### Opening Comments

The setting up of the Regional Waste Planning Offices has been a great success in our opinion. The Regional Offices have worked closely with the IWMA in areas of mutual interest over the past few years and we hope to continue to work closely together to achieve our common goals of providing the highest standard of waste management in the world and meeting the very challenging targets set by the EU in the suite of current waste management legislation.

The IWMA supports the existing privatised waste management market in Ireland and we believe that it offers fair and open competition. We recognise that the Irish State has obligations to meet EU targets and must influence the behaviour of consumers, business and industry to meet those targets. We agree in principle with using fiscal measures to achieve those ends.

We also recognise that the State needs funding to support public awareness initiatives, waste enforcement, waste planning and the provision of civic amenity sites / bring banks. We accept that levies are a good source of such funding and we recommend that the Environment Fund is ring-fenced for these purposes and is used effectively to assist Ireland with meeting the challenging targets set by the EU.

We also acknowledge the provisions around Extended Producer Responsibility (EPR) and we see that as a significant contributor to funding waste prevention, reuse and recycling activities in Ireland in future years.

## Specific Topics

### 1.0 CIRCULAR ECONOMY

The IWMA is very supportive of the Circular Economy concept and the policies and plans that flow from it both nationally and internationally. Our members are very keen to see the materials that we collect converted back to products.

This requires:

- removal of non-recyclable materials, such as complex laminate plastics, from the marketplace;
- effective labelling of products to aid recycling;
- effort by the consumer to separate materials for recycling (including specified co-mingling of certain materials);
- separate collection, sorting and bulking by the waste industry;
- support from the authorities for End of Waste designations;
- re-processing by the waste industry and others;
- demand from the manufacturers / producers for recycled raw materials; and
- Government measures to encourage all of the above.

It is critically important that recycling is made easy for the consumer, is supported through sorting / processing and is financially attractive for business. The National waste Management Plan should encourage measures that address these key elements.

The Plan should also encourage and support new technologies, as the waste sector is constantly evolving. For example, we support a digital Deposit Return System (DRS) as the best environmental option and the one that is most convenient for consumers. It is a new concept, but so was the plastic bag levy twenty years ago and Ireland was one of the first countries in the world to introduce it. We can and should be a world leader in waste management as Ireland is a very progressive country in many areas including digital technology.

We take the view that End of Waste for a range of materials needs to be pushed harder in Ireland. The EPA needs to allocate more resources to this area and make decisions in a shorter timeframe as these decisions are essential to Ireland's Circular Economy efforts. A National End of Waste framework for IBA and other waste streams is urgently needed to encourage reuse as seen throughout the EU.

Similarly, we need the EPA to make decisions on licence applications and review applications in a shorter time-frame. Innovation in waste management is currently stifled as it takes years to approve any significant change at a waste management facility.

The role of the producer is also critical. It is clear to our members that too much non-recyclable plastic is used in packaging and there is too little information provided on recyclability of packaging. We urgently need to remove non-recycling packaging from the marketplace and we need consistent labelling on packaging that makes it easier for the consumer to decide what to do with the package after the product has been consumed.

## 2.0 WASTE GENERATION AND PREVENTION

For many years, Ireland has been accused of generating high levels of MSW compared with other EU Member States and that continued in the Waste Action Plan published by the DECC in 2020, where it states on page 16:

*“In 2017, each person living in Ireland produced, on average, 577 kg of municipal waste, which is well above the European average of 487 kg.”*

This statement is very misleading. It is common knowledge in the waste industry that municipal waste in Ireland includes all commercial waste, whereas municipal waste in most other European countries includes household and institutional waste, but not commercial waste. So this statement is not comparing like with like. We ask that the National Waste Plan avoids comparing MSW in Ireland with MSW in other countries.

The best measure is the comparison of household waste generated in each country. Ireland, with a figure of 316kg per capita per annum compares very favourably against the EU average of 419kg. The following Table puts waste generation in Ireland into the correct context when compared against other European countries.

**Table 1 Comparison of Household Waste Per Capita across Europe**

Rank	Country	2016 Household Waste	Population	Household Waste Generation per capita (kg)
<b>EU (28 countries)</b>		<b>214,700,000</b>	<b>513,000,000</b>	<b>419</b>
1	Romania	4,098,427	19,640,000	209
2	Serbia	1,589,709	7,022,000	226
3	Poland	9,534,484	38,430,000	248
4	Croatia	1,144,199	4,154,000	275
5	Hungary	2,905,569	9,798,000	297
6	Slovenia	633,790	2,066,000	307
<b>7</b>	<b>Ireland</b>	<b>1,513,544</b>	<b>4,784,000</b>	<b>316</b>
8	Finland	1,791,659	5,503,000	326
9	Estonia	429,882	1,316,000	327
10	Czechia	3,579,613	10,580,000	338
11	Slovakia	1,889,523	5,435,000	348
12	Turkey	27,985,092	79,810,000	351
13	Malta	165,852	460,297	360
14	Montenegro	227,055	622,471	365
15	Lithuania	1,119,278	2,848,000	393
16	Bulgaria	2,840,316	7,102,000	400
17	United Kingdom	27,300,581	66,040,000	413
18	Wales	1,329,560	3,170,000	419
19	France	29,193,619	66,990,000	436
20	Sweden	4,410,872	9,995,000	441
21	Belgium	5,041,207	11,350,000	444
22	Greece	4,788,304	10,770,000	445
23	Latvia	870,177	1,950,000	446
24	Germany	37,409,896	82,790,000	452
25	Cyprus	394,911	854,802	462
26	Spain	21,689,437	46,720,000	464
27	Norway	2,444,305	5,258,000	465
28	Portugal	4,897,262	10,310,000	475
29	Austria	4,268,278	8,773,000	487
30	Italy	30,116,606	60,590,000	497
31	Netherlands	8,549,762	17,080,000	501
32	Denmark	3,480,305	5,749,000	605

### 3.0 WASTE INFRASTRUCTURE

We support the provision of existing recycling infrastructure across the country in a general sense. We expect that the waste industry will provide sorting facilities, where required and the State will provide more civic amenity sites and will facilitate sites for bring banks. Additional reprocessing infrastructure, where feasible, would also be supported by the waste industry. Reliance on international markets (particularly in Asia) is clearly problematic, particularly in terms of paper and plastic recycling.

The 2015 Regional Waste Management Plans provided detailed analysis of waste management infrastructure in Ireland and we expect that this database will be updated for the National waste Plan. The Regional Waste Management Planning Offices have also completed further reports on waste infrastructure in Ireland including reports on C&D Waste, CA Sites and quarterly reports on residual MSW. These reports are very informative and assist greatly with waste management in Ireland, so we congratulate the Regional Waste Planning offices on their endeavours in that regard.

The IWMA takes the view that new waste management infrastructure is needed in all areas as the market is competitive and should remain competitive going forward. Also, waste arisings are growing, despite the impact of waste prevention measures. The population is growing by about 1% per annum and the economy was growing very strongly prior to the current COVID-19 pandemic. Once the vaccine roll-out is complete and the pandemic passes, we expect strong economic growth once again in Ireland and that will give rise to waste growth. The waste growth predictions in the 2015 regional waste plans proved to be very accurate, prior to the pandemic, so we have confidence that the regional waste planners will take a realistic view of likely future waste growth. Previous predictions in the regional waste plans suggested about 2.5% per annum waste growth and we agree with that view.

With growing waste volumes and the need to maintain a competitive environment, we ask that the new National Waste Plan encourages the development of appropriate waste management facilities for recycling and recovery. We are not in favour of limiting development based on the national need, as that inhibits competition and has proven to be unreliable in the past, as some facilities close or are not developed. We recommend the use of fiscal measures such as levies and subsidies<sup>1</sup> to encourage the flow of waste up the waste hierarchy rather than control through planning or permitting restrictions. Investors will not invest in facilities that cannot secure waste feedstock so facilities that are not needed will not be developed. In making such decisions, investors will take cognisance of fiscal measures that will drive waste towards higher tiers in the waste hierarchy.

The processing of applications by the EPA is far too slow and is a hindrance to the provision of necessary waste management infrastructure. This has been the case for many years and rarely improves. The EPA needs to urgently allocate more resources to this area.

We suggest that all licences should be issued in less than 12 months and amendments to licences should be facilitated in a process that takes a few months rather than several years. The current system is just not fit for purpose and urgently requires attention. The industrial emissions licensing regulations include statutory timelines for decisions, but the EPA is not complying with those timelines and is constantly seeking consent from the applicants for more time. So the issue requires more than legislative changes.

We suggest that the legislation surrounding Strategic Infrastructure Developments (SID) should be reviewed and revised. The 6-month timeline for processing a SID application by An Bord Pleanála is meaningless when the Board does not have to accept an application until it is ready. There is no time limits on the pre-application process and we can see that this can be problematic.

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<sup>1</sup> eg. Producer responsibility subsidies

Also, the threshold for waste facilities under the Strategic Infrastructure Act is too low and should be reconsidered. A 100,000 t/a waste facility is relatively modest in the current context and we are aware of several facilities that have been designed to be less than the threshold to avoid the Strategic Infrastructure process. That is a poor indictment of a process that was designed to fast-track and streamline the development of strategically important infrastructure. We suggest that the applicant should have the option of going down the standard planning route with their local authority, regardless of the size of the development.

We also recommend that there should be an option to engage in SID for changes to facilities that are above the SID threshold, but are operating with an historical planning permission that was achieved through the conventional planning system, prior to the introduction of the SID process.

#### **4.0 MEETING THE EU MSW RECYCLING TARGETS**

It will be very challenging for Ireland to meet the EU MSW recycling targets of 55%, 60% and 65% by 2025, 2030 and 2035, respectively. The IWMA is supportive of national measures to address poor recycling performance, particularly in the commercial and apartment waste sectors. We have also been pro-active in supporting greater engagement with the public to encourage better waste segregation and recycling at home. We have supported the regional waste planners in trials on food waste recycling awareness and we have commenced our own trials on encouraging householders to improve the recycling levels at their homes.

However, we are not confident that awareness and encouragement alone will result in consumer behaviour that will drive Ireland's recycling rate from 40% to 55% by 2025 and to 65% by 2035. There is an urgent need to do more in that regard.

We have analysed data from waste management in Germany and Wales, where MSW recycling rates are much higher than in Ireland. The main difference between Ireland and better performing countries such as Germany and Wales is the collection and recycling of biodegradable garden and parks waste. This accounts for between 10% to 11% of MSW in these countries and greatly assists their recycling levels, but in Ireland it only accounts for about 1.8% of MSW. We recommend that the National Waste Plan gives consideration to the collection and recycling of the biodegradable garden and parks waste that is managed by all the local authorities in Ireland and all the public and private golf courses and playing pitches. The grass could be used as fuel for AD and the other biodegradable parks waste could be shredded and composted with the compost used in the local authority parks. This measure alone could increase Ireland's MSW recycling rate from 40% to 50%. The cost of this measure is likely to be a lot less than the cost of paying the fines that we can expect from the EU if and when we fail to meet the 2025 target. We are not opposed to such a scheme receiving a large subsidy from the Environment Fund.

We also respectfully suggest that the authors of the National Waste Plan research MSW recycling rates in the best performing countries in the world. This research may suggest opportunities to target particular materials or waste streams that have low recycling rates in Ireland compared to better performing countries.

The density of bring banks is an important factor for achieving higher recycling rates. We suggest that more bring banks are needed in Ireland for the collection of glass and textiles.

We also welcome the proposal in the new waste policy to install recycling litter bins on streets and at commercial premises. The public needs to be constantly reminded that recyclables must be kept separate from residual wastes and this will help in that regard.

## 5.0 PASSING THE RECYCLING TARGETS TO THE WASTE COLLECTORS

The IWMA is strongly opposed to the Government proposal to pass on the MSW recycling targets (55%, 60% & 65% by 2025, 2030 & 2035 respectively) to the collectors of municipal waste, for the following reasons:

- Kerbside collection is just one part of the system of collecting and managing MSW. Bring banks, civic amenity sites, textile collections, WEEE take-back, specialist collections from commercial premises, reuse, drop off points for biodegradable wastes, bottles collected from pubs & restaurants, etc. all have a part to play and kerbside collection will inevitably have the lowest recycling rates within that system as that is where the bulk of the residual waste is managed.
- Waste collectors cannot control the actions of the citizens of this State. Waste collectors must provide the tools by way of different bins, information, encouragement and incentivised charging but cannot be held responsible for the behaviour of customers that manage waste badly. As the saying goes, *'you can bring the horse to water, but you cannot make it drink'*. The responsibility for meeting the EU recycling targets falls upon all stakeholders, including every citizen of the State.
- The majority of Member States will fail to meet the future MSW recycling targets. When the recycling targets were set in the CEP, it was thought that Germany was recycling 66% of MSW, Austria at 59%, Slovenia at 58%, Belgium at 54%, Netherlands at 53%, etc. Hence the 55% to 65% recycling targets appeared achievable. However, we understand now that the calculation system that will be used going forward will reduce those recycling rates dramatically. Germany will be at 52% (if not lower), Belgium will be at 50%, Austria and Slovenia at 48% and the Netherlands at 47%. This is based on data received from the German Waste Management Association (for Germany) and based on a Eunomia report for the other countries.
- Passing the targets to the waste collectors is merely 'passing the buck' and will inevitably put waste collectors in non-compliance with their permits. All stakeholders need to work together to meet the targets, not just the waste collectors. Passing the buck in this way will only lead to conflict between the authorities and the industry that will take the focus away from the task at hand. A collaborate approach between the State and the waste industry is needed at this critical time.

## 6.0 AWARENESS AND EDUCATION

The awareness and education campaigns will need much larger budgets if Ireland is to increase recycling rates. Those working in the sector understand the system and are aware of the need to manage waste better. The majority of the public can be convinced to manage their waste better, but need to be constantly fed with information, encouragement and incentivisation. Waste management is a low priority issue for many people in Ireland. We need to make it a high priority for the majority of people if we are to have a step change in waste management performance in the country.

## 7.0 BROWN BIN ROLL-OUT TO RURAL AREAS

We note the Government proposal to extend the provision of brown bins to all households in the State. The IWMA has mixed views on this measure. We support additional capture and recycling of biodegradable municipal wastes, but we fear that the full roll-out could lead to increased prices for kerbside collections in rural areas, including villages and could have some negative environmental impacts in terms of carbon footprint if more trucks are required to collect waste in rural areas. There

is also the possibility that some people would drop out of the service in response to increased charges and we fear that their waste could be mis-managed as a result.

We therefore recommend a pilot-scale trial of this proposed measure before it could be introduced. The trial should:

- Quantify the additional cost of the service to each house and pass that cost to the householders in the trial.
- Count the number of households availing of the service before and afterwards.
- Quantify the gains in recycling due to the roll-out of the brown bins.
- Quantify additional environmental impacts due to additional waste collections. (most trucks operating in rural areas are split body trucks designed for two-bin collections, so a third bin could mean a second truck)
- Assess the possibility of switching to three-way split body trucks for three-bin collections in rural areas and consider the likely lead-in time for such a changeover.
- Follow up on any households that drop out of the system to analyse the environmental impact.
- The trial should be consistent with a full roll-out, i.e. information provided in a way that can be scaled up to all rural areas (e.g. door to door calling to all houses would not be realistic for large scale roll-out, but other forms of wider communication would be possible).
- The trial should be carried out over a long enough period to include renewal time, to analyse any dropouts from the service.

We are aware that some IWMA members are already collecting brown bins in rural areas, so data from those collections could also be analysed as part of a cost-benefit analysis for this proposed measure.

Changing from a 'two-bin' to a 'three-bin' system in rural areas is a challenge that needs some time to implement. The current fleet of bin lorries that are generally used in rural areas would need to be replaced by purpose built trucks with 3(No.) compartments rather than 2(No.). Retro-fitting existing trucks is not an option. Our members suggest that 2025 should be the target date for the full brown bin roll-out. This would give time for the trials to be considered and for trucks to be replaced.

We find that participation rates for brown bin usage in urban areas (>500 agglomerations) is poor in many areas. Therefore, we suggest that this needs to be addressed as a priority, whilst trials are carried out on the roll out of brown bins to rural areas. The IWMA has engaged with DECC, Cré and the regional planners on this issue with a focus on the recommendations of a Pilot Study that involved delivery of kitchen caddies and liners to three parts of the country. This shows the value of pilot scale trials and the IWMA's involvement in scaling up from successful trials.

We suggest that the State authorities should analyse the existing situation with regard to householder participation in the areas that have already been served with brown bins. Anecdotally, our members are frustrated by the number of brown bins that have been delivered and are not currently in use. We strongly recommend that the enforcement authorities visit houses that have a brown bin and do not use it or send letters to those houses informing them of the legal obligation to put food waste in the brown bin and not in the other two bins. We suggest that this action could have a greater impact compared with delivering brown bins to all households in rural areas.

The IWMA members are open to discussions with respect to part-financing the inspection and enforcement of households that do not avail of a kerbside waste collection service and those that do not avail of the brown bin service in agglomerations of more than 500 people. The inspections could



be carried out by a private company, with relevant approvals and follow up enforcement carried out by the local authority enforcement personnel.

## **8.0 HOME COMPOSTING**

We understand from correspondence with the EPA that home composting can contribute to the 2025 recycling targets. A straightforward assumption can be used for up to 5% of MSW, but more detailed analysis is required if Ireland wants to claim a higher figure. We suggest that the National Waste Management Plan should consider the merits of home composting in rural areas where collection efficiencies are low. IWMA members could play a role in promoting home composting bins and in determining the number of customers that are using them.

## **9.0 COLOUR CODING OF BINS**

We recognise that consistently coloured bins would assist education and awareness, so it would be nice to have, but our members are very concerned about the costs involved in transitioning from the current situation. A variety of bin colours are currently used in both household and commercial waste collection, as there has never been a legal requirement to use any particular colours.

Our members have rolled out residual waste bins over the past 30 years and whilst the majority are grey/black, many are other colours such as green, purple, red, etc.

The MDR bins were rolled out over the last 20 years. Many of our members chose blue rather than green as green bins are used for green waste in many countries, whereas blue was associated with paper and the MDR bins were mostly paper at that time and are still 40% paper now. These decisions were made in consultation with the local authorities in many cases, so there was no suggestion in many parts of Ireland that the MDR bins should be green.

As the roll out of the food waste bins is more recent and was directed by legislation and waste policy, these bins are mostly brown in colour.

The costs of changing bin colours would have to be paid for by the State, as it would be very unfair to expect individual companies to take on such costs and if they did, it would result in unfair competition as some companies would have to recoup those costs from their customers, whilst other companies would avoid that burden. There would also be a dispute between blue versus green for the MDR bins as there are very large numbers of both in circulation today.

We have surveyed our members to determine the costs involved in replacing bins. The cost of a new 240L bin is about €26, but that is only part of the cost, as the bins need to be delivered and the old ones removed. Another factor to consider is that it can be difficult to access bins as they are not always put out on collection day, so several visits will be needed to many customers. The replacement cost is higher in lower density areas. Our members have suggested that the replacement costs for household bins are in the range of €30 to €60 per bin.

We estimate that c.1.5 million bins (including household and commercial) would have to be replaced to meet the suggested colour scheme, so the total cost of replacing all bins with new branded and chipped bins is estimated at c.€75 million, based on the figures provided by our members. The bins taken back would have little or no demand and would mostly be scrapped. This would represent a poor environmental outcome and would be difficult to justify in waste management policy.

Alternatives, such as replacing the bin lids or attaching a coloured plastic wrap around the bin were also considered by our members. The plastic wrap is not a good option as it is very labour intensive and requires calm and dry weather conditions to carry out in situ. Also, the wrap will get badly damaged when the bin hits the 'shaker' bar as it is emptied.

Replacing bin lids could be an option, but our survey of members suggested that this would cost about €40 million, which may not be good value for a partial solution.

Phased replacement of bins, based on new customers and damaged bins, would also be problematic. Companies would have customers with different coloured bins for each waste type and that would make communications between the company and its customers very difficult.

There are also dangers associated with changing the existing bins in relation to confusing customers that have followed the rules imposed by their service provider for many years or even decades. For example, there are many green bins currently used for residual waste. Telling customers that the green residual waste bin is now the green recyclable waste bin would undoubtedly lead to serious problems in those areas.

In summary, we consider it to be a ‘nice idea’ to standardise the bin colours but not an option unless the Government is willing to spend €75 million on this exercise. We suggest that the money would be better spent on awareness, education and enforcement of those that do not manage their waste correctly.

We need to accept that there are a variety of bin colours in use and refer to the bins as ‘waste’, ‘recycling’ and ‘food/compost’ or some other agreed terminology. We advise against using the term ‘recovery bin’ as many people, outside of the waste sector, do not know the difference between ‘recovery’ and ‘recycling’ and the terminology could get confused. We surveyed our members that collect kerbside household waste to see what terms are currently known to household customers. Here are the results:

1	Waste	Recycling	Compost or Food
2	Waste	Recycling	Food
3	General Waste	Dry Recycling	Food
4	General Waste	Mixed Dry Recycling	Compost or Brown
5	General Waste	Mixed Recycling	Food Waste
6	Waste	Recycling	Compost
7	Waste	Recycling	Food or Brown
8	Waste	Recycling	Organic
9	Residual	Recycling	Compost
10	Waste	Recycling	Food
11	General Waste	Recycling	Food
12	Waste	Recycling	Food
13	Waste	Recycling	Compost
14	Waste	Recycling	Compost or Food
15	General Waste	Dry Recycling	Food
16	Waste	Recycling	Organic

Any decision on consistent terminology must consider the terminology that is currently used in communications between waste collectors and household customers. Trying to find technically correct terms is not always the best solution when dealing with non-technical citizens.

From our survey, it appears clear that the public will understand the terms ‘waste bin’ and ‘recycling bin’ without any problems. The word ‘dry’ could be placed before recycling without confusing the public but may not be necessary if a shorter term is preferred.

We do not favour the term ‘food recycling bin’ as used by the Regional Planners, as repeating the word ‘recycling’ for two different bins could add to confusion. Some of our members only want food waste in the brown bin caddies and others want garden waste as well as food waste in their wheelie bins (140 or 240 litre). We therefore suggest that the brown bin could be nationally referred to as the

‘food/compost’ bin and locally collectors could use either ‘food’ or ‘compost’, depending on their individual situation.

Our customers know which bin to use for dry recycling, which bin to use for food waste and which bin to use for residual waste, we just need to agree on consistent terminology across the country to facilitate national awareness campaigns and labelling by producers.

## 10.0 PRIMACY OF THE KERBSIDE COLLECTION SYSTEM

The Regional Waste Management Plans recognised the primacy of kerbside waste collection and only supported Pay To Use (PTU) Compactors in areas where kerbside collection and CA sites were not available.

Section 16.4.10 of the Southern Regional Waste Plan addresses ‘Collection Infrastructure’ and states the following:

The quality of waste collected depends on the method by which the waste is collected. Segregation at source combined with kerbside collection is recognised as the best method currently employed in Ireland to ensure the presentation of high-quality material. The authorities recognise that manual kerbside-sort collections are becoming more common, particularly in the UK, with multi-compartment vehicles and operatives facilitating the source-segregation of up to seven waste streams. The implementation by private operators of such systems in Ireland remains an option provided the obligations of all relevant regulations are met.

The quality of waste materials has a significant influence on the recycling or recovery potential of the waste. In the absence of source-segregated kerbside collection systems, authorised civic amenity facilities or bring centres provide the next best method of household waste collection.

The Plan then introduces the following Policies, E22a and E22b giving priority to Kerbside source segregated collection, supported by civic amenity sites and bring centres:

### Policies:

E22a. The plan supports the primacy of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented.

E22b. The plan also supports the use of authorised civic amenity facilities and bring centres as part of the integrated collection system.

The plan then addresses PTU Compactors within Policy E23, as follows:

### Policy:

E23. In the absence of kerbside source segregated collection services and where the proximity of the civic amenity facilities and bring centres is prohibitive the plan supports localised collection solutions such as community drop-off points or pay-to-use systems subject to compliance with the household waste collection regulations.

Hence, the Regional Waste Management Plan only supports PTUs *'in the absence of kerbside source segregated collection services and where the proximity of the civic amenity facilities and bring centres is prohibitive'*.

We have reviewed the performance of the existing PTUs in Limerick and we found that the 5(No.) PTUs in that city recorded 0% recycling in 2018 and 0% recycling once again in 2019. These units are not compatible with a collection system that is expected to deliver 55% MSW recycling by 2025 and higher targets in 2030 and 2035, so we respectfully suggest that the National Waste Plan should recognise the threat that these units pose to Ireland's recycling performance and ban them outright.

If an outright ban is not an option, then the recycling rates of 55% by 2025, 60% by 2030 and 65% by 2035 must be applied to PTUs, if they are applied to kerbside collections. If it appears that these units cannot achieve those targets, they should be closed down. If lower targets are applied to kerbside collection, then we would expect consistency with PTU recycling targets.

## **11.0 CIVIC AMENITY SITES**

Civic amenity sites play a very important role in recycling in Ireland and the IWMA would welcome the development of more CA sites. Some of our members have developed CA sites co-located with transfer stations and we suggest that the new waste plan should encourage that type of development.

Residual waste accepted at CA sites should not be a cheap alternative to kerbside household waste collection, as kerbside is the most effective and efficient method for collecting non-bulky household waste and was given primacy in the Regional Waste Management Plans. There are external environmental costs associated with people driving to CA sites to dispose of waste that can be collected at their house in a scheduled route that trucks will take regardless of the number of houses using the service. Any customers availing of residual waste disposal at CA sites should be registered as a customer of the CA site and should have to justify that they do not have access to a kerbside collection service.

Where a customer has access to a kerbside collection service but claims that the service is too expensive for their needs, the NWCPO should have a facility to hear such claims and to seek a resolution with local waste collectors. In the event of a failure to resolve the issue, the householder could be allowed access to the CA site with residual waste.

We also recommend that any residual waste accepted at CA sites should be weighed as it is deposited, in the same way that all household kerbside bins are weighed. The weights should be assigned to the customer's account and can be analysed in the same way that kerbside customers can be analysed for waste prevention and recycling performance.

The Government proposes to introduce additional levies that will significantly bolster the Environment Fund. The IWMA, in our response to that consultation, has supported most of the proposed levies. We suggest that CA sites should be part-funded from the Environment Fund, but the management of residual MSW must not be subsidised as it is important that the customer is charged the full cost of management of that waste including the externalities associated with this lower preference option.

We also suggest that the further development of Extended Producer Responsibility schemes should contribute to the funding of recycling at CA sites. All producers of products should have responsibility for the post-consumer management of their products and should have to contribute to waste prevention, reuse and recycling in line with the principles of the Circular Economy. There should be funding from this source to develop more CA sites and to expand the services on offer in the existing ones.

## 12.0 APARTMENT WASTE

We understand that Dublin City Council, with the support of IWMA members have completed trials at apartment complexes to introduce food waste recycling and the results have now been published. We support further actions based on the recommendations that have emerged from those trials.

Waste management at apartment complexes is arranged by the management company and the cost is invariably more important than the recycling and waste prevention outcomes. That dynamic needs to be tackled by the State, with the support of the waste collectors.

It should be mandatory to charge for each waste type by weight and to provide incentivised pricing to encourage waste prevention and recycling. There would then be an incentive for the apartment management company to inform, encourage and incentivise the residents to use the system correctly.

A Quality Waste Management Assurance Award Scheme could be applied to apartment complexes. The scheme should involve the inspection of records and inspections of bins by independent auditors. It would be ideal if this were somehow tied to a financial reward and/or penalty system such as rates or water/wastewater charges and the savings/charges passed on to the apartment dwellers via their service charges. This could lead to peer pressure and self-policing by the residents.

## 13.0 COMMERCIAL WASTE

We recommend the introduction of mandatory pay by weight for commercial premises to better incentivise waste prevention and recycling. Charging by weight will also provide better data that will better inform future measures, plans and policy.

We recommend the introduction of a ban on placing food waste, garden waste and recyclable wastes in residual waste bins at commercial premises accompanied by enforcement.

We also recommend 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. A series of guidance documents could be prepared and distributed via business organisations such as IBEC, SFA, ISME, etc.

We also recommend a properly funded, strong awareness campaign to inform business owners and the general public of their waste management obligations at home and at work.

We support the concept of a Quality Waste Management Assurance Award Scheme for commercial premises. We suggest that the scheme should be linked to commercial rates with discounts applied based on performance. The companies should have to pay independent accredited auditors to rate their performance, thereby reducing the enforcement burden on the local authorities.

## 14.0 FOOD WASTE

We note that Ireland is committed to UN Sustainable Development Goal 12, which states:

<b>12.3</b>	By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses	DAFM	DCCAIE, DFAT
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The IWMA supports this concept, but we are am concerned about the interpretation of this goal and the definition of 'food waste'. The goal must be to reduce the amount of food that is being wasted, which is not the same as 'food waste' that our members collect in brown bins. That food waste contains materials that were never edible such as peelings, skins, bones, shells, grinds, tea-bags, etc. It can also contain grass, branches, leaves, etc from gardens, depending on the size of the brown bin.

The EPA Municipal Characterisation report suggests that only 6% of Household waste comprises Edible Food waste. The figure appears much higher for commercial waste, but there is not a lot of detail to determine whether that includes unavoidable food waste such as peelings, bones, etc.

We ask that the National Waste Plan gives due consideration to the prevention of food wastage, as opposed to the generation of unavoidable 'food waste'. Home cooking may produce more peelings, compared with pre-prepared food, but it produces less packaging waste and it is healthier.

## 15.0 CONSTRUCTION & DEMOLITION WASTE

It should be mandatory to charge by weight for mixed waste materials collected from C&D sites in order to encourage greater waste prevention and recycling. This would also reduce the over-loading of skips, which can be dangerous. Source segregated skips could be exempt from the mandatory weight charging, thereby encouraging on-site separation of recyclable materials.

Planning compliance for construction and demolition projects requires a C&D waste management plan to be submitted to the local authority. Those plans should be scrutinised by a person or persons in the local authority that has adequate expertise in the area of C&D waste management. Training should be provided, as necessary. The plans should indicate if any materials are likely to be declared as by-products and any later declarations of by-products should not be allowed without revision of the plan and approval of the local authority of the revised plan. We also suggest that these plans should include a breakdown of waste volume by type to allow materials to be tracked from a project to the end facility. A material balance should be carried out at the end of the projects to monitor waste/materials management on site and identify areas for improvement as well as assist with national capacity planning.

Once the C&D waste management plan has been agreed with the local authority, there should be inspections and enforcement to ensure that the plan is carried out as described.

In this context, we welcome the proposal in the consultation document to *'Revise the 2006 Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Waste Projects.'*

Planning permission for C&D projects should always require C&D waste management plans to be agreed with the local authority in advance of commencement of development.

In addition, we recommend that National Standards should be developed for recycled materials derived from C&D waste to allow these materials to be used in construction projects.

We recommend that levies be applied to the use of virgin material where a recycled material is available as an alternative and the money ring-fenced to assist recycling and to assist the development of secondary raw materials, including product specifications and standards.

As an alternative to imposing levies on virgin materials, consideration should also be given to the requirement of a mandatory percentage of recycled content in materials used in construction.

We recommend training for site managers in C&D waste management and that could be included as a planning condition for C&D projects. It could be included as part of the condition that requires the submission of a C&D waste management plan to the local authority. Certified training courses would

follow on from such a move and it would be incumbent upon construction companies to ensure that their site managers have the appropriate certificate in C&D waste management.

In recent years, Ireland has successfully complied with the 70% target for recovery of C&D waste, set in the Waste Framework Directive. However, this has been largely facilitated by the need for engineering materials at municipal waste landfills and by backfilling. C&D fines have been used as landfill cover and recycled aggregates have been used for landfill berms and roads. Now that Ireland is landfilling a lot less municipal waste, the 70% target will have to be reached in different ways, so much greater effort is required by the relevant stakeholders to find more sustainable recycling and recovery options for C&D materials. This will require work in the areas of 'end of waste', specifications/standards and legislation to require minimum recycled content and/or levies on virgin materials.

## **16.0 WASTE ENFORCEMENT**

The IWMA recommends 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.

Transparency is very helpful in terms of identifying criminal activity in the waste sector. Legislation should be introduced that ensures that all waste facility annual environmental reports are available to view on-line. More eyes on waste reports will help to identify the false data that hides criminal activities.

## **17.0 ENERGY RECOVERY**

The IWMA supports the EU Waste Hierarchy and our members encourage waste prevention and recycling through the provision of separate collection and incentivised charging. However, we must also cater for residual MSW as not all materials that are present in the waste stream are recyclable. In line with the waste hierarchy, we support energy recovery ahead of landfill disposal, but we also recognise that landfill is needed for some materials that are not suitable for energy recovery. The landfill levy ensures that energy recovery is a competitive option for residual waste and landfill disposal is a last resort. Ireland has been successful in diverting waste from landfill using the levy as an economic instrument with the result that landfill disposal has decreased from 2 million tonnes per annum 15 years ago, to less than 400,000 tonnes per annum now.

We support the energy recovery process for residual MSW as it provides an essential service and fulfils a sanitary function for society. It is an essential component of an integrated waste management system which treats residual, non-recyclable and unavoidable waste (including rejects from the recycling process). It contributes to the State's decarbonisation agenda through avoided GHG landfill emissions and replacement of fossil fuels in energy generation.

## **18.0 WASTE EXPORTS**

In an ideal scenario, Ireland would be self-sufficient in terms of recycling and recovering the waste that we collect, but as a small country this is just not viable so we need to maintain export options

going forward. We ask that the new Plan takes account of this need to export waste and avoids barriers in that regard.

Ireland currently has no paper mill or pulper, so we must export all of our recycled paper. We re-process some recycled plastic in Ireland, but we do not have large scale plastic re-processing facilities, so we also rely on international markets in that regard. We have some glass recycling on the island of Ireland. Metal re-processing requires massive quantities to compete, so once again we rely on very large operations in other countries in that regard.

In the case of residual MSW and similar commercial waste, export plays an important role to ensure the Irish waste market is competitive and functions during waste generation peaks and treatment capacity dips. This situation is unlikely to change in the foreseeable future, so we need to keep export of that material open as a viable option.

Similarly in the case of hazardous waste, where even with the planned infrastructure becoming a reality, there are still numerous types of hazardous waste and significant quantities of each, that it will not be possible to treat in Ireland and will require export.

## 19.0 EWC CODES

Our members are finding that there are inconsistencies amongst the authorities in the interpretation of EWC Codes. Mixed messages have been delivered recently by the EPA, NTFSO and local authority personnel. Our understanding of the key issues are as follows:

**15 Codes** – these should be used for any packaging materials received or dispatched from waste facilities as we must track packaging waste to the final destination comply with the PRI schemes and to report recycling rates.

**17 Codes** – these should be used for C&D waste received at facilities and for C&D waste dispatched from facilities, so long as those materials have not been mixed with non-C&D wastes, such as MSW.

**19 12 10 Code** – this code is restricted to Solid Recovered Fuel that meets a standard suitable for use in co-incineration.

**19 12 12 Code** – this code should be used for mechanically treated waste dispatched from waste transfer stations, including fines. There should be a description attached to differentiate between C&D fines, MSW (organic) fines, recycled aggregate, etc.

**20 03 01 Code** – this code should be used for mixed municipal waste received at waste transfer stations, with a description attached to differentiate between residual MSW and Mixed Dry Recyclables (MDR). If this material is bulked without mechanical treatment such as screening or shredding, it should remain as 20 03 01 as it is dispatched from waste transfer stations.

The acceptance of wastes at re-processing or final treatment facilities is often dependent on the EWC code applied, so it is critically important that there is consistency in this area.

## 20.0 EDUCATION AND AWARENESS

The IWMA supports continued education campaigns by the Regional Planners and others. We suggest that the development of [www.mywaste.ie](http://www.mywaste.ie) on a rolling basis is needed given ongoing issues with contamination and confusion relating to the recyclability of many materials.

We recognise that the public can be confused about the recyclability of particular wastes, particularly plastic packaging. The first place that a person will look for information is on the packaging item in their hands, but that information is often missing or misleading.



We strongly recommend the introduction of a standardised and certified labelling system to identify recyclable and non-recyclable packaging materials. Such a scheme would greatly assist the public and would highlight non-recycling packaging, to which eco-modulated fees can be applied at high rates, thereby discouraging the production of non-recyclable materials. It must be independently certified or it is likely to be abused.

## **21.0 DATA GATHERING**

The Regional Waste Management Planning Offices have been very proactive in data gathering and that has proven to be very helpful, particularly with regard to management of residual MSW. The recent reports on C&D waste as well as Civic Amenity sites are also very welcome and we encourage the RWMPOs to continue with the worthwhile pursuit of such data gathering.

We recognise that the EPA submits data to Eurostat on behalf of Ireland and we know that this is a challenging task that is constrained by a strict set of rules. We would welcome closer engagement with the waste industry in the compilation of that data. We would also welcome a breakdown of materials counted towards Ireland's recycling figures in addition to packaging wastes, that are currently well documented. A better understanding of the recycling rate for all materials would help the waste industry to identify and target areas that could be improved.

## **22.0 INCONTINENCE WEAR**

In 2015, the IWMA gladly committed to assisting in a scheme that would provide Government subsidies to those that had heavy residual waste bins due to the need to dispose of incontinence wear. We committed to passing the subsidy to customers that would be identified by the relevant authorities. We understand that the scheme has been stalled for reasons that are outside our knowledge or control. We encourage the authorities to move forward with this scheme as soon as possible as the incentivised charging system unfairly targets those that have no option but to place large quantities of incontinence wear in residual waste bins.

We hope that this submission is helpful and we look forward to further positive engagement with the DCCA on this and other waste policy issues.

Yours Sincerely,



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