

Response ID ANON-W3ZQ-NNPG-8

Submitted to **Call for Expert Evidence - Climate Action Plan 2021**

Submitted on **2021-05-10 17:26:09**

About you

1 Name

Please provide your name, or the name of the organisation you are representing.:

Irish Waste Management Association

2 Email

Please include a contact email address if you would like to receive a copy of your submission.:

cwalsh@slrconsulting.com

Carbon Pricing and Cross-Cutting Issues

1 What further opportunities exist within our taxation system, beyond measures already implemented and planned, to promote emissions reductions, either on an economy-wide basis, or in specific sectors?

Please provide details in the text box provided:

We recommend that non-recyclable materials placed on the market should be taxed. This can be done by way of eco-modulation of producer responsibility fees, i.e. through REPAK and other producer responsibility schemes.

We also ask that consideration be given to taxing virgin products that have a recycled alternative or requiring a minimum recycled content in products to stimulate the recycling market.

We need to encourage the production of biogas and biofuels that are derived from waste materials, so that may require a tax on natural oil and gas, with a subsidy on oil and gas derived from waste food and vegetable matter such as grass and waste cooking oil.

2 What supporting policies might be required to offset the impact of any taxation changes on low income households or those most at risk from fuel poverty?

Please provide details in the text box provided:

If the use of waste materials to substitute virgin materials is encouraged financially or subsidised, this will result in more positive value on some recyclable waste materials, such as dry recyclables, food waste and garden waste. That would bring down the cost of waste management for householders, resulting in a saving that could be offset against additional fuel costs.

3 What further measures might be required in the planning system to realise the objectives of the National Planning Framework in respect of climate action?

Please provide details in the text box provided:

The development of recycling and other climate positive waste management facilities is severely hampered by planning and licensing delays and by delays in processing end of waste applications. The Strategic Infrastructure Act is not fit for purpose in our view as it is very slow and very expensive. Applicants should have the choice to use the traditional planning route, even if the scheme is eligible as an SID project. The EPA should process all licence applications in 6 to 9 months. It currently takes years to get a licence and this has been a problem for the last 2 decades.

4 What specific additional measures might be required to promote sustainable growth in our urban centres, including to realise the potential of a "15-minute city"?

Please provide details in the text box provided:

No comment

5 What specific additional measures might be required to promote sustainable growth in rural areas?

Please provide details in the text box provided:

No comment

6 Are there further measures that the Government should take to channel private finance into low-carbon investments in Ireland?

Please provide details in the text box provided:

No comment

7 Are any changes required in Ireland's research policy to channel research funding into climate action-related topics?

Please provide details in the text box provided:

No comment

8 Is there any additional information you would like to submit in relation to Carbon Pricing and Cross-Cutting Issues?

Please provide details in the text box provided:

No comment

Electricity

1 What options are available to increase the penetration of renewable electricity beyond the 70% committed to in Climate Action Plan 2019?

Please provide details in the text box provided:

Greater incentives for electricity produced by CHP fuelled with biomethane produced at anaerobic digestion plants.

Greater incentives for electricity produced in waste to energy plants.

2 What can be done to increase the uptake of offshore wind and solar PV in particular, in the context of the Programme for Government ambition?

Please provide details in the text box provided:

No comment

3 What role does renewable gas have in the power generation sector?

Please provide details in the text box provided:

A very important one. The incentives to produce biomethane in the Republic of Ireland have been poor by international standards in the past and appear to be non-existent currently. Gas Networks Ireland has an ambition to displace all natural gas with renewable gas by 2050. We welcome that ambition but we do not see how this can be achieved in a country that does not financially support the production of renewable gas. We recommend a high tax on natural gas and a high subsidy of renewable gas.

4 What role could carbon, capture and storage have in decarbonising our power sector?

Please provide details in the text box provided:

It has potential and should be explored further.

5 What other opportunities exist to support the decarbonisation of the electricity sector?

Please provide details in the text box provided:

Renewable transport fuels should be promoted financially in the same way that renewable gas should be supported with a system of taxes and subsidies.

6 What measures might be taken to improve the resilience of the electricity system to the impacts of climate change?

Please provide details in the text box provided:

No comment

Enterprise

1 What measures can be taken to accelerate the uptake of carbon-neutral low temperature heating?

Please provide details in the text box provided:

2 What measures can be taken to tackle high temperature heating in industry?

Please provide details in the text box provided:

3 What measures can be introduced to reduce to F-Gases in the Enterprise sector?

Please provide details in the text box provided:

4 How can we encourage the diversification away from cement in construction?

Please provide details in the text box provided:

Please provide details in the text box provided:

5 What role could Carbon Capture and Storage (CCS) have in industry, and what steps would encourage its deployment?

Please provide details in the text box provided:

6 What other opportunities exist to support the decarbonisation of the enterprise sector?

Please provide details in the text box provided:

7 What measures should be taken to address the risks that climate change poses for enterprise?

Please provide details in the text box provided:

Built Environment

1 Can Ireland exceed the target of retrofitting 500,000 homes by 2030? If so, how?

Please provide details in the text box provided:

2 How should Ireland's training and education system scale to meet the skills requirements to achieve this target?

Please provide details in the text box provided:

3 Should Government consider bringing forward a phase out of the installation of fossil fuel boilers?

Please provide details in the text box provided:

4 Should further specific changes be made to Ireland's building standards be introduced to support the decarbonisation of Ireland's private and commercial building stock?

Please provide details in the text box provided:

5 What emerging technologies (e.g. in relation to heating, lighting, and/or building fabric) should be considered for use in Ireland's construction industry to promote further decarbonisation?

Please provide details in the text box provided:

6 What supports can we provide to assist the greater use of low-carbon building materials? How much consideration should be given to embodied carbon in construction materials?

Please provide details in the text box provided:

7 Are there specific technologies that should now be prohibited?

Please provide details in the text box provided:

8 What trade-offs between decarbonisation and air quality may need to be further considered in policy design?

Please provide details in the text box provided:

9 Are there specific household behaviour changes that should be considered? Should such changes be mandated by way of regulatory changes?

Please provide details in the text box provided:

10 What specific further measures should be considered to promote decarbonisation of Ireland's existing commercial buildings?

Please provide details in the text box provided:

11 Is there scope to further develop and deploy district heating opportunities in Ireland?

Please provide details in the text box provided:

12 What specific approaches should be taken to accelerate decarbonisation of Ireland's public sector building stock?

Please provide details in the text box provided:

13 What other opportunities exist to support the decarbonisation of the Ireland's building sector?

Please provide details in the text box provided:

14 Are there further specific measures and policies, including through planning and building regulations, that might improve the resilience of our building stock to climate change?

Please provide details in the text box provided:

Waste and the Circular Economy

1 How can we ensure that measures support sustainable economic models (for example by supporting the use of recycled over virgin materials)?

Please provide details in the text box provided:

In cases where the recycled materials are low in volume, compared with the virgin materials (e.g. aggregate), we recommend that the product should have a mandatory recycled content. Where the volumes of recycled materials have the ability to replace the virgin materials entirely and can meet an equivalent standard (e.g. biomethane), we recommend a tax on the virgin material and a subsidy of the recycled one.

2 What other opportunities exist to support the decarbonisation of the waste sector and through the circular economy?

Please provide details in the text box provided:

We recommend the introduction of a Digital Deposit Return System (DDRS). The current plan being developed by the Department of Environment, Climate and Communications is to introduce an old fashioned 'return to retail' DRS with 13,000 over the counter return points and 2,500 reverse vending machines. The system is to be designed to take beverage containers in the form of aluminium cans and PET plastic bottles.

The IWMA commissioned SLR consulting to carry out a carbon assessment comparison of a DDRS versus a 'return to retail' DRS. The 'return to retail' model uses an additional c.20,000 tonnes of CO₂e each year, compared against the DDRS. That is equivalent to burning 10,000 tonnes of coal unnecessarily every year, which we suggest would be a large backward step in the context of Ireland's carbon neutrality ambition. SLR used very conservative assumptions, so the impact of the 'return to retail' DRS may actually be even higher than this.

The development of a 'return to retail' model would be a big mistake in terms of carbon impacts and public convenience. The digital version uses the existing kerbside collection system for returns and can be expanded much more easily to take a wider range of materials such as cartons, tetra-pak, steel cans, HDPE plastic bottles, plastic trays, glass bottles (at bring banks), etc.

We also argue that the Digital version of a DRS can be introduced much faster than the 'return to retail' model, as it would use about 1.5 million existing recycling bins (household, workplace and other bins) and would use existing collection trucks and sorting centres (Materials Recovery Facilities). It only requires labelling and an App. There are several Apps already developed that can meet the need immediately. Hence the Digital DRS would produce climate change benefits sooner than the traditional DRS model.

In conclusion, we predict that the introduction of a 'return to retail' DRS model in Ireland will become an embarrassment for the Irish Government, in the context of a missed opportunity to develop a Digital model that has a much better carbon outcome and is much more convenient for the citizens of the State.

Public Sector Leading by Example

1 What opportunities exist for the public sector to step up its climate ambition?

Please provide details in the text box provided:

Public procurement should strongly promote recycled products and those that have a high recycled content.

The authorities, particularly the EPA, must process applications faster, including licences for new facilities and end of waste designations for recycled materials that can be used as products.

2 What sort of practical changes would you expect the public sector to make in leading and delivering Ireland's climate ambition?

Please provide details in the text box provided:

Grass cut by local authorities should be used as feedstock in anaerobic digestion plants to produce biomethane, even if that requires a gate fee to be paid to the AD plants. a system of taxes on natural gas and subsidies on renewable gas could make this work economically for the local authorities and for the plant operators. This would have a positive impact on meeting EU recycling targets as well as replacing fossil fuels with renewable fuels.

3 How can the public sector support wider society to change? In the short-term, medium-term, long-term?

Please provide details in the text box provided:

No comment

4 What are the biggest barriers for the public sector in reducing greenhouse gas emissions and how can they be overcome?

Please provide details in the text box provided:

No comment

5 What other opportunities exist to support the decarbonisation of the public sector?

Please provide details in the text box provided:

No comment

6 What practical steps should the public sector take to adapt to climate change?

Please provide details in the text box provided:

No comment

Just Transition

1 Which regions, sectors, or industries do you believe will be most adversely affected by climate policy in Ireland and over what timeframe?

Please provide details in the text box provided:

2 What types of supporting interventions should be considered by the Government to address the specific areas identified?

Please provide details in the text box provided:

3 What specific further measures should Government undertake in order to realise the benefits of the low carbon transition, including in relation to supporting the development of low carbon sectors of the economy, including employment in these sectors?

Please provide details in the text box provided:

4 What specific investments should be considered to support a just transition in Ireland?

Please provide details in the text box provided:

5 How should the State finance just transition initiatives and investments?

Please provide details in the text box provided:

6 What changes should be considered in Ireland's social welfare system to support population cohorts that might be more adversely affected by the low carbon transition?

Please provide details in the text box provided:

7 Are there specific issues for consideration in Ireland's further education, training and skills system?

Please provide details in the text box provided:

8 What other issues should be considered by the Government to inform just transition policy in the 2021 Climate Action Plan?

Please provide details in the text box provided:

9 What additional supports could be considered for regions that are most at risk from the physical impacts of climate change?

Please provide details in the text box provided: