

## Template for comments on the Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects

Submission to [nwpp@epa.ie](mailto:nwpp@epa.ie) to be received by 5 pm on Tuesday 1st June 2021.

In completing this form, you agree that you have read and accepted the [EPA's Privacy Policy](#)

### Your Details

<b>Organisation Name</b>	Irish Waste Management Association
<b>Contact Name</b>	Conor Walsh
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<b>Submission</b>	<b>Please tick as relevant:</b> This submission is made on behalf of my organisation <input checked="" type="checkbox"/> This is an individual submission <input type="checkbox"/>

### Comments on Specific Text

*Please copy as many times as required*

Page / Section	
<b>Current text</b>	
<b>Your Proposal</b>	
<b>Rationale</b>	

## Observations

These guidelines are an update on the 2006 Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects, with an increased emphasis on prevention, recycling and resource management.

Your observations on the following aspects are invited.

### *Tier 1 and Tier 2 thresholds (Section 3.1)*

*We agree with this concept and the thresholds appear reasonable.*

### *Tier 1 and Tier 2 Reporting Templates – (Appendix B and C)*

*The Tier 2 reporting requirements are very detailed. We suggest that the design should include the use of recycled content in the construction materials.*

### *Resource and Waste Inventory Template (Appendix D)*

*The inventory should include a section on by-products and a section on materials that are classified as End of Waste materials.*

### *Usability of the guidelines in an operational setting*

*It is important that the local authorities have the resources to review these Plans fully and are in a position to approve them or any revisions to them in a short time-frame. We would not want to see unnecessary delays in construction caused by this process. We already have delays with licensing and EoW assessments that are impeding developments that support the Circular Economy.*

### *Layout and presentation of the guidelines*

*Very good*

### *Please provide any other observations or comments on the Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects.*

*We suggest that any amendments to the C&D Plans must be approved by the local authority as part of planning compliance, before they can be actioned. This is particularly important where a party decides to declare By-Products instead of waste.*

*These C&D plans should feed into the Track and Trace system that is being developed by the NWCPO, which we consider to be critically important as an enforcement tool to prevent unauthorised disposal of waste.*

**Closing date for submissions is 5pm on Tuesday 1<sup>st</sup> June 2021**