



- 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 waste industry plays a pivotal role in Ireland becoming a more circular economy. Traditionally the sector's function was the removal of discarded material for disposal, however that function has changed dramatically from this historic function to the current scenario where our sector is a key stakeholder working with our client base to find better reuse, recycling and recovery options with disposal now being the least used option.

Primary drivers to this change have been driven by legislative changes e.g. EU directives, fiscal drivers such as the cost of virgin materials and also the critical need to achieve environmental sustainability. The interdependence between waste / by-product producers and the waste management sector has become more symbiotic. Increasingly the waste sector has gained expertise in the reworking of waste materials into reusable raw materials. Private investment by our members continues to build services and capability here in Ireland but we are also acutely aware that while we establish expanded facilities in Ireland the export of partially worked or segregated materials to specialist facilities outside of Ireland is key to the delivery of sustainability.

The IWMA supports the existing privatised waste management market in Ireland and we believe that it offers the best opportunity to develop sustainable best practice in the sector. We recognise that the Irish State has obligations to meet EU targets and together with our sector it 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 can be a useful 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 new challenging targets.

Under the provisions of polluter pays principles, we acknowledge the benefits 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 Questions

5. Will the proposed programme provide appropriate leadership & support for Ireland in successfully adopting the circular economy?

i) Highlight areas of strength.

ii) Provide details on areas that are missing or would benefit from additional focus.

The proposed programme has strengths in the form of engagement, partnerships and supports. However, in order to really progress the Circular Economy, we suggest that two details are missing:

- pull measures need to be introduced to encourage the reuse and recycling of materials to close the loop. This could include mandatory recycled content or fiscal measures to encourage the use or reuse of secondary raw materials.
- We respectfully suggest that the EPA needs to focus on shorter timeframes for determination of licence applications and End of Waste applications. This is a critical element for development of a Circular Economy in Ireland. Without the ability to adapt to change in a reasonable time-frame, the advance towards a Circular Economy will be a very slow one.

6. The programme is built on a four-pillar structure:

- Advocacy, Insights & Coordination
- Innovation & Demonstration
- Delivering through Partnerships
- Regulatory Framework for Circularity

Do these pillars provide a suitable framework for the programme to address the key aspects of circular economy for Ireland? If not, please propose alternatives.

We suggest that the headings are suitable, but more will be needed, as mentioned in response to the previous question and further elaborated below.

7. With regard to the initial programme activities highlighted under each pillar do you consider they are appropriate in scale and nature to meet the overall goal of the programme to be a driving force for Ireland's move to a circular economy?

Yes

No

We suggest that interactive engagement is necessary to raise awareness, rather than just education. One-way communication is ineffective for the majority of people. Incentivised charging for waste collection, which is a form of Pay As You Throw (PAYT) is somewhat effective in raising awareness of the value of waste and the need to prevent, reuse and recycle materials. The IWMA is working on other awareness raising measures such as a recycling rewards trial and a digital Deposit Return System (DRS) trial. We are also committed to engaging further with the public on better participation in the brown bin scheme for biodegradable wastes and this includes giving starter packs to new customers and offering them to existing customers.

We suggest that digital technology, including the use of smartphone Apps, should be considered to engage the public in a more interactive way.

We also suggest that labelling of products is critical. This should be visible instructions on end of use recycling, recovery or disposal, but should also include a Quick Response (QR) Code or other form of unique identifier that gives information, instructions and/or deposit returns via a smartphone.

Social media feeds and media information provision are key to delivering elements of the overall message but this must be done in a cohesive and non-ambiguous fashion. The waste sector can play a role in this by providing Irish content from local industry real life impacts. E.g. the background stories for various Pakman awards, etc.

We consider that green public procurement is a very important aspect of developing the Circular Economy in Ireland. There have been very few real examples in this area to date, despite its inclusion in waste policy documents for several decades. The IWMA recently pointed to the lack of green requirements in the Government procurement of waste services. We can also see issues with procurement of textile banks by some local authorities, where the end destination and treatment of the textiles has not been a significant factor in the procurement of that service.

This is an area which could develop further if End of Waste criteria could be fast tracked.

## 8. With regard to the activities highlighted under each pillar, are there others that should be included, and why?

There appears to be very little in the way of incentivisation in the programme. We respectfully suggest that setting the framework, providing guidance, education and demonstrations will be necessary, but not enough to achieve the Circular Economy aims. We need to incentivise behavioural change and then make it easy for people to change their behaviour.

Some examples are offered as follows:

- Householders should be incentivised to reuse and recycle materials with financial rewards for reuse and recycling good behaviour and financial penalties for unsustainable behaviour such as disposing of recyclables in the wrong bin.
- It should be easy for householders to recycle, firstly by providing clear and correct information on packaging and allowing people to recycle at home, at work and on the go. The proposed return to retail model for a Deposit Refund System is an example of adding hurdles to the ease of recycling.
- Materials must be designed for reuse and recycling. The proposed programme appears to lack engagement with designers and manufacturers to encourage design of products for reuse and recycling.

- Businesses should be financially incentivised to perform well in terms of the Circular Economy. The IWMA has previously suggested a scheme for businesses to improve recycling and waste management performance that would be linked to a discount on commercial rates, with those outside the scheme or performing poorly penalised with higher commercial rates.
- The use of virgin materials with zero recycled content should be penalised with a tax or levy to improve market dynamics for recycled materials. The use of recycled materials must be facilitated by national standards and End of Waste decisions.

9. With regard to the activities highlighted under each pillar, do you think that any of these are not appropriate for this programme? Please indicate these, and outline why?

No, but more could be added as discussed above.

10. Do you think the stated [objectives](#) articulate an appropriate i) level of ambition and ii) breadth of engagement, to achieve systemic change? If not, please say why, and/or propose other objectives.

The document does not appear to set targets or timeframes or identify deliverables, so it appears to lack ambition in that sense. It appears to set a framework rather than a Programme. We would like to see a detailed programme of tasks, deliverables, targets, timeframes, etc, that would show how Ireland can transition to a Circular Economy in the coming years.

11. What targets & indicators do you think should be considered to guide the development and demonstrate progress of the programme?

- i) Please propose appropriate programme targets.
- ii) Please propose suitable programme indicators.

As the Trade Association for Waste Management in Ireland, our focus is on recycling. We have recycling targets already set by the EU and we are in serious danger of not meeting the 2025, 2030 and 2035 MSW recycling targets. In order to achieve those targets we will need the following actions in the next few years:

- 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 and greater use of brown bins for food waste and other biodegradable waste);
- more re-processing of recyclables in Ireland;
- support from the EPA for End of Waste designations;
- 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 Circular Economy Programme should encourage measures that address these key elements.

12. In terms of focus areas, the programme references the material streams identified in the European Green Deal:

- *Electronics & ICT*
- *Batteries & vehicles*
- *Packaging*
- *Plastics*
- *Textiles*
- *Construction & buildings*
- *Food, water & nutrients*

Are these the correct focus areas for this programme to address in terms of embedding circularity in Ireland? If not, what topics areas should the activities of programme focus on to reflect the Irish context?

The Programme has to address the EU MSW and packaging waste targets. Investment in that area is critical as failure to meet the targets will result in large financial penalties imposed on Ireland by the EU. It is clearly better for Ireland to spend money on meeting the targets than to pay fines for failure. Investment is needed in public awareness, in EPA licensing and EoW decisions, in tackling poor recycling performance in businesses across the country, in labelling and design of products, in removing non-recyclable products from the marketplace, etc.

13. Are the proposed stakeholder engagement provisions appropriate to facilitate learning, collaboration and dissemination? What additional/alternate actions would strengthen this?

We respectfully suggest that these are tools and information sources, rather than actions that will lead to a major change in how we manage waste in Ireland. We have outlined many potential actions in this submission and we recommend that these are included in the Programme with deliverable timeframes.

### Final Remarks

The waste industry has a wealth of experience in managing waste efficiently and in direct engagement with customers (the public). Our members' combined experience is an important resource that should be harnessed by the decision-makers. Our ambitions are consistent with the Government's ambitions with regard to the Circular Economy and we believe that we can help achieve those goals.

In general, we see that Ireland has informed regulatory frameworks in place to achieve the desired goals. However, we feel that implementation and interpretation of these regulations (and legislation) by enforcement / competent authorities does require urgent review.

A National End of Waste framework for Incinerator Bottom Ash (IBA), Recycled Aggregates and other waste streams is urgently needed to encourage reuse as seen throughout the EU. Our members have also advised that there are other raw materials that could also benefit if resourcing was increased and time frames reduced in this area.

Similarly, in the area of Waste Licensing the decision time line is inordinately too slow. The EPA needs to significantly reduce the delays that are currently in play in this area, e.g. members have advised

that 2 year time lines are the norm here when trying to make changes or increase capacities for regular arisings. Our members feel that this problem stems from a lack of experienced resources available to the agency to progress these applications in a timely manner. At present delayed responses and delayed requests for additional information are typically utilised to postpone decisions. This is unacceptable if we are to adapt and change to the needs of a circular economy.

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. By comparison, statutory timelines for waste and industrial licences and permits are 13 weeks in England and Wales.

We also need the development of technical standards for EoW materials to allow their use in construction, manufacturing and elsewhere.

Social enterprises, such as the community resource sector, repair shops, charity outlets, etc., play a key role in the circular economy in Ireland. They have enormous potential to develop further. We suggest that current regulations are amended to facilitate and enhance the role of such social enterprises. We propose that, subject to a social enterprise meeting a number of simple governance and environmental criteria, then NWCPO-permitted collectors should be allowed use them as outlets for bulky items.

To achieve better circulatory goals requires change at many levels. This means investment in a range of items – equipment, people and education and encompasses all steps in the chain.

- Fiscal stimulus measures should be in place to help support measurable reductions in energy and virgin raw material consumption. Where industry can prove these improvements measures such as tax breaks or reduced VAT charges etc. may be useful drivers to assist in achieving these investments.
- The role of the producer is 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-recyclable 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. In the case of packaging, the process of Eco-modulation is a very useful tool in changing industries attitude about using non-recyclable materials.
- The public need to be properly informed and have access to factually correct information so that those that wish to inform themselves can do so. Inclusion of elements of circular economy plan in the national curriculum will yield benefits in the long-term.
- Balanced success stories from all sectors of the economy should be rewarded for achieving positive outcomes. The various compliance schemes such as Repak, WEEE Ireland, ERP and RepakELT have an important role to play in this sphere.
- Also, Ireland needs more re-processing infrastructure to turn recycled materials into products. There is scope for supporting a paper pulper/mill and for re-processing of other materials such as plastics, wood, glass, etc.
- As many of our members operate logistics systems for collection of materials from our clients, we see merit in greater support for utilisation of electric / hydrogen powered vehicles that would reduce emissions arising from the national fleet. Some members have already embarked in fleet changes but a national policy to support same would be helpful with incentives to do so.

- We also suggest that the Government should financially support the production of biomethane from biowaste at Anaerobic Digestion (AD) plants. This biogas replaces natural gas, which is a fossil fuel and it can be used to fuel waste collection trucks and other vehicles, whilst also recycling nutrients to land to replace artificial fertilisers. This is an excellent example of a circular economy within the waste sector.

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.

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

Yours Sincerely,

A handwritten signature in cursive script that reads "Conor Walsh".

Conor Walsh  
IWMA Secretary

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