



Draft National Waste Management Plan Consultation,

By email only to submissions@nationalwasteplan.ie

30th June 2023

Re: Consultation on the Draft National Waste Management 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). Membership of the IWMA is comprised of approximately 70 waste management companies, as listed here <https://iwma.ie/about-us/list-of-iwma-members/> .

Our website, 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, metal, 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 Management 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 support the fact 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.

Overall Impression of the Draft National Waste Management Plan (NWMP)

We wish to congratulate the Regional Planners and their consultants on the preparation of a very professional and detailed Plan covering a very wide area of waste management topics. The draft plan is well written, well presented and technically very good. We support the vast bulk of the plan and having reviewed all of the documents, we just have a few queries and observations, as detailed in this submission.

Specific Topics

Vol. 1. Section 2.3 and Appendix 9 - Siting Guidelines for Waste Facilities

We broadly support the siting guidelines included in Appendix 9 of the Plan, but we have concerns over some of the setback distances. We suggest that there should be no setback distance required between a pre-treatment facility and a neighbouring business/industry. The draft Plan suggests a range of 10m to 50m setback, depending on the nature and size of the pre-treatment facility.

As most waste transfer stations are located in areas zoned for industry, enterprise and/or employment, that would effectively sterilise land that is designated to provide employment. We expect that the majority of existing waste transfer stations (including those developed by local authorities) would not comply with the proposed setback distances and the vast majority of those facilities do not interfere negatively with neighbouring businesses. In the design of many facilities, the wall of the main waste transfer building is also the boundary wall and that wall often provides a greater defence against noise, dust, odour, litter, etc. than would be provided by a 25m or 50m setback distance.

With the requirement for such setback distances, we can envisage a situation where waste companies would have to apply for permission to develop pre-treatment facilities on unzoned land, such as agricultural land, where such setback distances are achievable without sterilising land that is zoned for employment. The developer may be able to demonstrate that there is no zoned land in the target area where such setback distances can be achieved. This is a potential negative unintended consequence that must be considered by the authors of the Plan. In a worst case scenario, there could be no suitable sites in a county where these setback distances can be achieved.

We also suggest, for the same reasons, that there should be no setback distances between ATFs or other metal recycling facilities and neighbouring industries or businesses. A number of Ireland's metal shredding facilities are located at Ports, where zoned land is in high demand and many neighbouring enterprises are not sensitive to noise. For example, there is a lot of storage of materials at Ports, prior to export and those facilities are not sensitive to neighbouring metal recycling. To sterilise zoned land at Ports is likely to have a very negative unintended consequence on the operation of the Port.

The proposed requirement that thermal treatment facilities must be located within 5km of national roads appears to be very stringent. Currently in Ireland, we mostly have large thermal treatment plants, but smaller and modular thermal treatment technologies could be developed in the future and these could be located at existing or decommissioned sites such as power stations, landfills and mines, where there is good infrastructure, but are not necessarily located close to National Roads.

For example, the Lisheen Mine site is available for new and innovative developments, but is located more than 5km from a National Road. We suggest that the NWMP should encourage such developments rather than effectively prohibit them.

We also query the requirement for 'Waste Storage Facilities' to be within 10km of National Roads. The footnote states that these are 'permanent storage facilities' but the description mentions 'the main storage building'. We are unaware of any buildings in Ireland dedicated to the permanent storage of waste and we struggle to envisage such a scenario. The requirement for such permanent storage in a building must relate to very specialised waste and would probably require very specialised site selection.

Permanent storage at a landfill, a salt mine, etc, would be dictated by the availability of such storage at existing facilities, so in that case, we suggest that the siting guidance should not be so specific, as this could rule out the optimal sites.

Vol. 1. Figure 5.2 – we note that the Y Axis of this chart has been labelled incorrectly.

Vol. 1. Figure 5.4 – we note that 'other collections' is repeated in the legend of this chart.

Vol. 1. Table 5.1 – we note that the number of licensed and permitted facilities is not consistent with the total number presented. 243 + 59 is not equal to 749.

Vol. 1. Section 5.4.1.1 Composting, Anaerobic Digestion and Biostabilisation

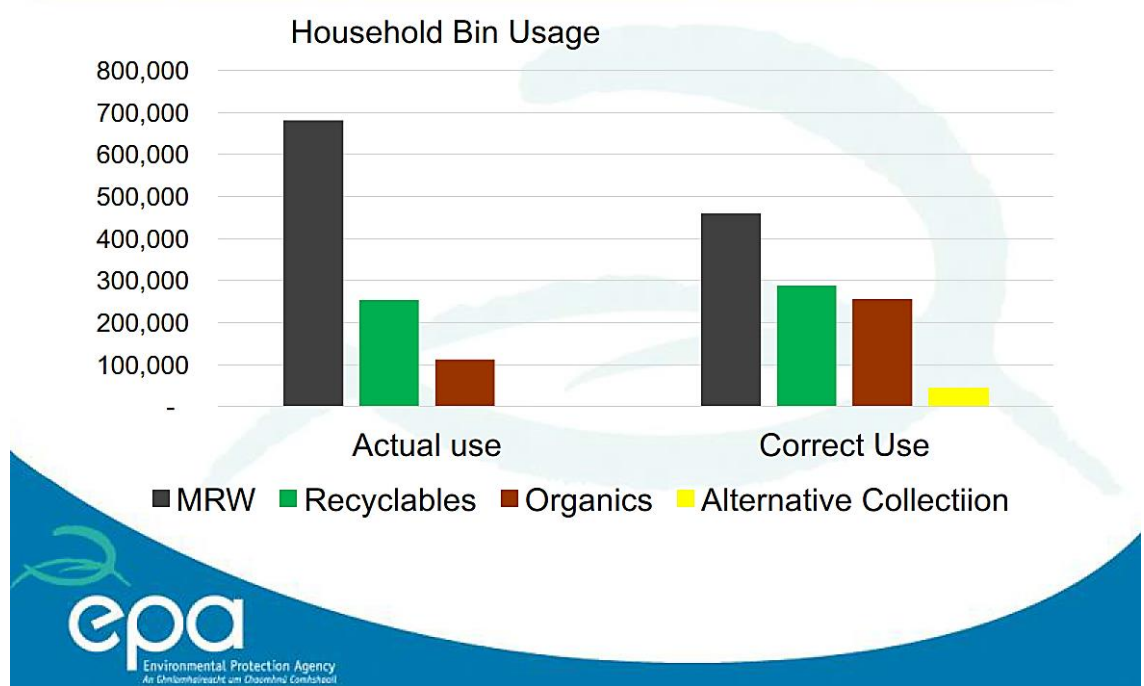
The final paragraph of this section states:

"The data suggests that there is sufficient capacity in the market to meet the current demands and with a target to reduce food waste generation by 50% in 2030 the capacity need should decrease."

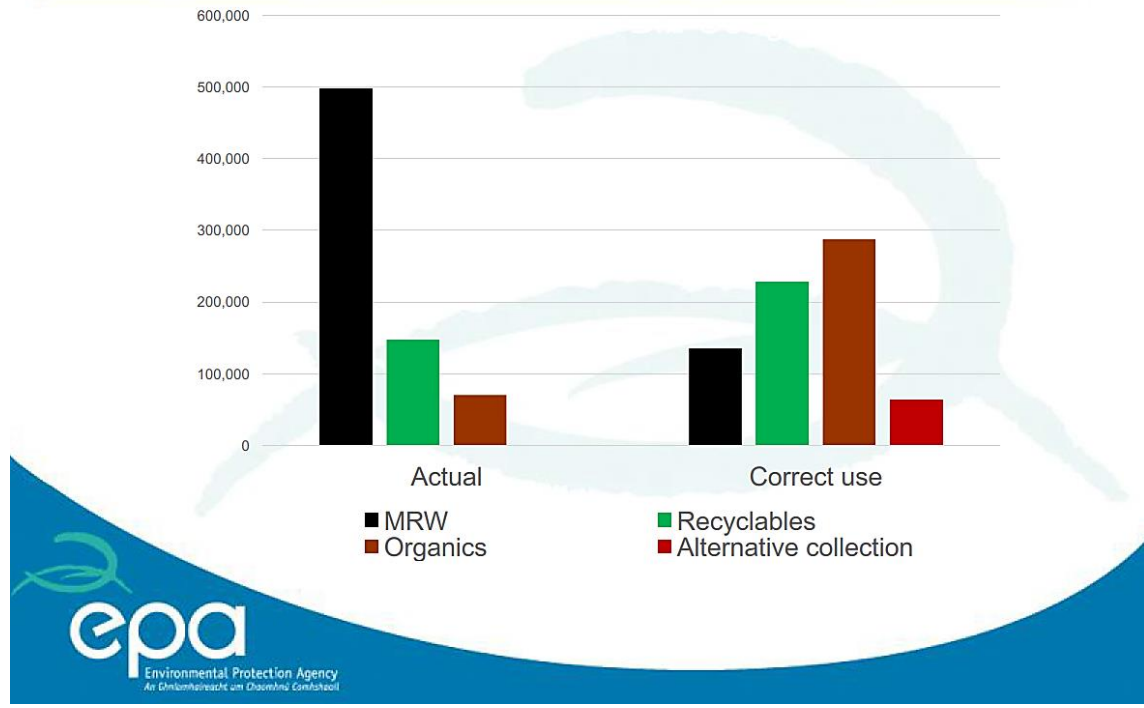
There is a fundamental flaw in this conclusion. The 50% SDG target is not to reduce source segregated organics, it is to reduce food waste at different stages of production, retail and consumption. The EPA waste characterisation data from c.2018 shows that the capture rate for organic (biowaste) waste as source segregated material is a low percentage of all biowaste/organic waste. The following two slides

from an EPA (Helen Searson) presentation of the Waste Characterisation Reports shows that there is potential for a major increase in the capture of food waste as source segregated organics suitable for biological treatment. The presentation was delivered to the Irish Waste Management Conference.

Household Bin Usage



Non Household Bin Usage



The Regional Planning Offices are familiar with the new legislation that requires enhanced roll-out of food/biowaste (brown) bins to commercial premises and full roll-out of brown bins to all households in the State. This is expected to generate significant increases in feedstock for biological treatment facilities.

In addition to the arguments presented above, the IWMA is of the view that biological treatment facilities should not be restricted by the NWMP. They play a crucial role in increasing Ireland's MSW recycling rates at a time when we are not on track to meet the targets set in the Waste Framework Directive for 2025, 2030 and 2035. In Ireland, about 10% of our MSW is comprised of source segregated biowastes. That figure is about 20% in Austria, Germany and the Netherlands and even higher at about 24% in Italy. Doubling our tonnage of this material would require major new biological treatment capacity and that should be our goal.

It is also notable that a lot of current spare capacity in biological treatment is due to two large AD plants that have both experienced difficulties in commissioning – Glenmore Biogas in Donegal and Huntstown Bioenergy in Dublin. In the attached report on Waste Treatment Capacity in Ireland, prepared by SLR Consulting in 2022, it was estimated that spare capacity at biological treatment plants in Ireland decreased from 37% in 2018 to 30% in 2019, but if Glenmore and Huntstown are removed from the dataset, spare capacity dropped to 10% in 2019 and that is likely to be much lower now in 2023.

Furthermore, biogas plants are often designed to process a variety of organic biowastes in conjunction with domestic and commercial source separated organics (SSO), including industrial organics from food and beverage processing, wastewater treatment sludges, animal manures and agricultural wastes. Several hundred thousand tonnes of industrial organic wastes and by-products are generated each year in Ireland as well as millions of tonnes of animal manures and farm wastes. There is clearly not enough biological treatment capacity to cater for these volumes and the potential for an AD sector to process these materials is enormous, delivering the many wide ranging environmental, sustainability and circular economy benefits associated with this technology. A suggestion that biological treatment capacity need should decrease could be used out of context to frustrate planning and development and deployment of treatment capacity for these other organic biowaste categories, as well as discouraging investor interest in this important sector.

The business cases for biogas plants processing these non-MSW biowastes often relies upon the inclusion of domestic and commercial SSO to ensure economic viability so limitations should not be placed on individual projects in terms of categories of acceptable organic biowastes. Unavoidable and inedible SSO biowaste is an important feedstock for AD plants and indeed is recognised as such in the EU Renewable Energy Directive II. There is no environmental case to reduce the SSO element of feedstock for AD plants.

Biomethane produced in AD plants can make an important contribution to achieving Ireland's 2050 decarbonisation targets. Biomethane can reduce reliance on and replace fossil fuels used in heating and transport and in particular can help with hard to decarbonise parts of industry and transport. In addition to helping achieve important waste recycling targets and delivering renewable energy and sustainability benefits, the use of digestate produced in AD plants as a biofertiliser represents an environmental betterment compared to landfilling or composting food biowaste or landspreading untreated manures or industrial sludges, particularly with regard to air and water quality, as well as providing improved biosecurity. Therefore, there should be no limitation applied to the development and deployment of this important and urgently needed infrastructure.

Furthermore, technology and plant efficiencies are constantly evolving and improving and the development of new plants is required to replace older and less efficient plants as they progress toward and reach their end of life. Newer more cost-effective facilities can deliver better value to the entire supply chain and ultimately to the householder and commercial premises that produce and

discard SSO biowaste. Sufficient capacity is needed in the system to ensure adequate redundancy to cater for plant breakdowns and maintenance and to provide competitive gate fees for waste collectors which ultimately will be economically beneficial to consumers. In contrast, a shortfall of biological treatment capacity could lead to higher gate fees at AD and compost plants which would result in higher costs transferred through to householders and commercial premises.

In addition to the need to biologically treat source segregated organics, biological treatment is also used for pre-treatment of residual waste, for several purposes. This issue has been addressed in detail in a joint Cré/IWMA position paper submitted to DECC and the RWMPOs earlier this year.¹

So in conclusion, despite the SDG target to reduce food waste, we fully expect significant increases in source segregated biowaste in Ireland over the next few years and we strongly recommend that the NWMP does not place barriers in the way of the development of new biological treatment infrastructure to meet that future demand. There should be no fear of over-supply of biological treatment plants.

It is also noteworthy that the EU Commission has recently released an Early Warning Report² that relates to the prospect of each Member State meeting the targets set in the Waste Framework Directive. The EU considers that Ireland is at risk of missing the MSW recycling rate targets and the report recommends *“Further develop waste treatment infrastructure, including increasing bio-waste treatment capacity and supporting home composting.”*

Vol. 1. Section 5.8 Contingency Capacity for Waste

We support the need for contingency capacity in Ireland, but we suggest that the best way to provide that capacity is through existing operational facilities, such as landfills. Knockharley landfill now has contingency capacity after a long process to acquire regulatory approval. Drehid Landfill is currently in a similar process and is expected to have contingency capacity granted in the near future. There may be other operational facilities that could also offer such contingency capacity.

The concept of developing a local authority licensed facility to provide contingency at a capital cost of €10million to €12million and an annual operational cost of €2million is not supported by the IWMA. It is likely to prove to be an unnecessary waste of public money and could be seen as a white elephant. A much better option is to build contingency capacity into operational infrastructure that can accept extra waste at short notice without additional commissioning or mobilisation.

We also accept that there needs to be a very clear set of rules around how contingency capacity is activated and ended to ensure that this capacity is reserved for the types of events for which contingency capacity is strictly necessary so that it is used appropriately.

Vol. 1. Section 5.9 Nationally Important Infrastructure

The IWMA welcomes the concept of nationally important infrastructure, but we consider some of the thresholds to be too high. We suggest that the threshold for recycling infrastructure, including AD, composting and metal recycling should be set at about 40,000 t/a. Some of our members' MRFs, metal recycling facilities and composting plants are of that scale and we consider that they are of national importance, as the loss of any of those facilities would put a lot of pressure on the system. Transfer stations of that scale are less critical nationally, although they are often critical in a local or regional sense.

¹ Sent to RWMPOs by email on 31st March 2023. Position on Removing Landfill Levy Exemption for Stabilised Biowaste, Cré & IWMA, 23rd February 2023.

² IRELAND 2025 EU waste recycling targets STATE OF PLAY, EU Commission June 2023.

Vol. 2. Section 3.2.6 Construction Waste

In the opening line of this section, it states that the WFD set a recycling target of 70%. We understand that it is a recovery target, not a recycling target.

Vol. 2. Section 3.2.8 Batteries

This section of the Plan gives specific mention to lead-acid, nickel-cadmium and “other waste batteries”. The plan should identify the issues around Lithium Ion batteries give more specific attention to dedicated ways to collect/manage Li Ion batteries as it is one of the most significant operational issues facing the sector at present. Mismanaged Li Ion batteries have the potential to shut down infrastructure capacity for MSW.

Vol. 2. PA4.5 (DECC/LAs)

Pay to Use (PTU) facilities achieve very low recycling rates (less than 1% in 2020 and less than 2% in 2021³) and should not be promoted in the NWMP, which is largely focused around increasing recycling rates. To the best of our knowledge, there is no PTU in the country currently accepting food waste, despite legal obligations to do so at many locations.

There are particular circumstances where PTUs may have a role, but a blanket promotion in the NWMP is likely to lead to a proliferation of those facilities in areas with high levels of coverage by way of kerbside collections, which the Plan recognises as having primacy (TP4.1). This will clearly lead to a reduction in recycling rates in those areas and work against the efforts of our members to achieve the Waste Framework Directive recycling targets. We therefore strongly object to the promotion of that infrastructure in the NWMP.

Vol. 2. Focus Area 14 – Recovery Infrastructure

The IWMA welcomes and supports the work of DECC in creating new legislation to allow partial reviews of EPA licences and a more efficient approvals process whereby the planning and licensing processes can progress in parallel rather than in line. This should help with the provision of new waste recovery infrastructure.

Vol. 2. TP14.2

The IWMA welcomes TP 14.2 (also TP 11.2) in relation to supporting the provision of 200,000-300,000 t/a of additional dedicated thermal recovery capacity for the treatment of non-hazardous residual wastes nationally, to ensure there is adequate active thermal treatment capacity. The distinction of dedicated capacity is important and delivers on what the RWMPOs said in their May 2020 report⁴ about thermal coprocessing at cement kilns being vulnerable and the need to take this into account in the calculations of overall thermal recovery capacity in future Waste Management plans.

In ‘Section 7.2 Dealing with Vulnerabilities’ of that report, it is stated:

*“**Thermal Coprocessing** – Thermal coprocessing has developed as a significant MSW recovery option accounting for 240,000 tonnes of Solid Recovered Fuel in 2019. Due to the commercial vulnerability of this waste outlet consideration may have to be given to its inclusion in the calculation of total thermal capacity in future regional waste management plans.”*

³ Based on data supplied by a PTU Operator in a planning application for a PTU in Monaghan.

⁴ Interim Report - Performance of the Waste Sector in Ireland - Covid 19 – Initial Restrictions Phase 12th March – 18th May 2020, Regional Waste Management Offices.

Vol. 2. TP14.5

The IWMA is supportive of TP 14.5 / 13.2 where the provision of national capacity for bottom ash from existing thermal treatment facilities, pending the provision of alternative uses would optimise the circularity of this material.

Other Issues

Article 28 – End of Waste

Our members see ‘end of waste’ decisions as critical to the functioning of the Circular Economy. Without end of waste, the economy remains linear and the circle cannot be completed, resulting in low levels of circularity. We recommend that ‘End of Waste’ should be added as a Focus Area in Volume 2. We support the work of the EPA in developing National End of Waste and By-Product decisions.

Critical Raw Materials

Since the previous consultations on the draft plan, there have been major developments at EU level on the issue of critical raw materials. These are recycled mostly at metal/WEEE recycling facilities and we suggest that the plan should support such recycling and make it easy for the public to recycle those materials. There should be public access to all metal recycling facilities that wish to provide such access and there should be greater awareness raising in relation to WEEE return points.

We hope that this submission is helpful and we look forward to further positive engagement with the Regional Waste Management Planning Offices on this and other waste management issues.

Yours Sincerely,



Conor Walsh
IWMA Secretary

cwalsh@slrconsulting.com
www.iwma.ie