



Public Consultation Waste Action Plan for a Circular Economy 2019

Submission from: Sustainability Office, Dublin City University

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This submission follows the format of the consultation document and responds to questions in the order they arise.

Consultation Questions –

2. Institutional Arrangements

• How are the current institutional waste prevention and management arrangements working and how could they be improved in your opinion?

There is limited understanding by the general public as to the existence and roles of the ‘Waste Management Institutions’. There also appears to be limited engagements across the Institutions – for instance – there is no agreed bin colour coordination across the country causing confusion – suggest country wide agreement on bin/bin lid colours as well as the list of what goes in each bin – which could also be put pictorially on side of bin.

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

As above – consistent message for entire country.

3.7 Municipal Waste

• What further measures should be put in place by Government, regulatory authorities (EPA, local authorities, etc.) and industry stakeholders in order to promote and incentivise waste prevention and improve proper segregation and recycling of waste by both households and businesses?

Consistent message right across country – incl consistent bin colours and labelling. Improved recycling facilities – many bring centres require a car to access them- consider local recycling stations. Manufacturing side intervention to reduce packaging and clearly identify on packaging how it should be recycled.

• What measures or practices are currently in place that could be improved?

- Consistent messaging – cradle to grave!
- Infrastructure improvement such as bottle banks at large grocery stores could be expanded to include clothes banks, small item WEEE ...

• What other new measures or practices could be put in place?

Manufacturing side intervention to standardise colour of plastics – so that for instance all ‘green rigid plastics’ can go in the green bin – remove ‘aesthetic’ reasoning for different colour plastics – stick to the most recyclable colour. Prohibit the manufacture of non-recyclable plastics – consider reusable options.

• What do you see as the barriers/enablers to these measures?

Barriers to reusable: perception of inconvenience caused by additional ‘work’ associated with managing reusable items, potential concern over hygiene of reusable items.

Enablers: deposit and return schemes (see 2GoCup scheme <https://www.2gocup.ie/> or Rí Cup <https://www.ricup.ie/>) – possible solution for lots of other service from pizza to butchers – customers pays €1 for reusable pizza box – whether delivered or purchased on site and returns when next pizza purchased or delivered – creates brand loyalty but also prevents a large amt of single use packaging – similar for butchers - meat put into lunch box type container and returned to butcher when next shopping – shops wash and sterilise containers for reuse – not customers.

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

We must move away quickly from single use projects – whether plastic or compostable – and move to reusable options – deposit and return schemes can provide customers with the convenience of single use but the environmental impact of reusable – and working collaboratively with others can reduce operational costs as well.

3.8 Household Waste

• Is incentivised charging working in your opinion? Are households being financially incentivised to prevent waste and recycle correctly through the 3 bin system?

Where the three bins system is provided I think households are being financially incentivised – when they understand and are aware of the difference charges. More work needed on the communications of these charge structures with penalties for those who continue to misuse the bin system contaminating waste streams. Additional training may be needed pre implementation of penalties – similar to Welsh system. WRAP Cymru at Environment Ireland 2019 commented that almost no one in Wales has had to be penalised to date due to the good communication & training they receive before and post “warnings”.

• Would an incentive scheme which compared your performance on how you generate and recycle your household waste with your area / county etc change your waste management behaviour?

NO – but perhaps an indicator on my bin like a Green dot for ‘good’, orange dot for ‘needs more work’ and red for ‘bad’ may provide sufficient feedback and peer pressure to encourage those who need to change habits. I would keep it very simple and not go mad with silver/gold or platinum stars!!

• What role should Civic Amenity Sites (local recycling centres) play? Should there be a standard service across all Civic Amenity Sites (CAS), such as the waste streams they accept? Should CAS accept general waste or only recyclables? Should CAS be used to provide more reuse opportunities, e.g. areas dedicated to exchange and upcycling? If so, how should this be funded?

Given the ‘waste’ that cannot go into kerb side Civic Amenity Sites have a major role to play – I would suggest agreeing a ‘standard CAS’ that would cope with the majority of non-kerbside waste – particularly non-bulky items (glass, batteries, textiles..)– it does not have to address all which could be dealt with at larger sites.

• What can be done to improve recycling (including organic waste) in apartment complexes?

Provision of infrastructure is paramount – all apartments need three bins system, a waste management policy and education supports along with consistent messaging and monitored community bins to ensure enforcement. Community bins could be in an enclosed gates area that requires an access code to support identification of any infringements.

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

Resource Efficiency and circular economy will require significantly more reusing of materials that are currently perceived as cheaper to replace than to repair – primarily because perception is based on € and not environmental impact. To support a more resource efficient community we will need to provide the support and skills development for people to be able to make the value decision to repair rather than replace – easy wins could be local repair workshop where skills are taught as well as repairs being undertaken.

3.9 Consultation Questions – Commercial Waste

• How could pricing structures for commercial waste collection be improved to incentivise better segregation and recycling of waste? For example, should pay by weight be introduced for commercial waste?

I understood that we already pay per weight/lift – what I would suggest is that the waste contractors provide more detailed breakdown of total volume collected in which colour bins (and the associated costs) and also a breakdown of how the individual bin colours are segregated and disposed of (and the associated costs) – and provide the customer with support to best prevent/segregate waste at source

• *What further incentives could be put in place to encourage business to recycle more?*

Increase the cost for general waste and increase the cost of landfill waste by v large amount. There is not sufficient incentive for business to identify alternative route to repurpose/upcycle/recycle items – on the other side there needs to be a more coordinated/improved approach on how to access services that will repurpose/upcycle/recycle items – there are several small players but little coordination.

• *Should a certification scheme be introduced for businesses to demonstrate that businesses are managing their municipal waste correctly (e.g. using the mixed dry recycling and organic waste bins properly)?*

This in particular would be useful for contractors/suppliers. A standard national certificate on this means that other businesses could look for the certification as a base criteria when choosing contractors/suppliers.

• *Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?*

NA

4.7 Consultation Questions – Food Waste

• *What are the underlying causes of food waste in Ireland?*

Disconnected understanding of the value of food and the environmental impact of wasting it along with a surge in perceived ‘lack of time’ and need for convenience!

Additional causes of commercial food waste:

Unserviced/leftover food in commercial kitchens – complicated by H&S and inability to distribute unserved food to worthy causes

Portion size model – one portion size does not fit all, but is applied to all

Bulk Packaging – i.e. only need 2 carrots but cheaper (€€) to buy bulk pack than two unpackaged carrots!

• *Should Ireland introduce a national prevention target in advance of a possible EU target?*

Yes – make sure measurement system is robust

• *How can Ireland become a ‘farm to fork’ global leader in food waste reduction?*

Not qualified to respond!

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

There are far fewer manufacturers etc that could be 'strongly encouraged' as well as trying to address individual behavioural change – but the system change may make the individual change much easier and quicker.

5.7 Consultation Questions – Plastic and Packaging Waste

• How can we make it easier for citizens to play a role in delivering on our targets?

Educate them and ensure they have the option to avoid

• Do waste collectors have a role to play?

YES – educate and appropriately incentivise them so that they can educate their customers

• What is the role of retailers?

Fundamental – Educate them and ensure they know impacts and what the right options are

• What is the role of manufacturers?

Fundamental – Educate them and ensure they know impacts and what the right options are

• Is there a role for voluntary measures (individual or by sector) and if so, what might they be?

Potentially as a start but measures need to be standardised and robust to provide any value and then made mandatory once support to enable is in place.

• Are there targets other than EU that we should be striving towards?

Perhaps we can consider that once we have reached the EU targets??

• Is the introduction of eco modulated EPR fees sufficient to eliminate excessive or difficult to recycle plastic packaging? If not, what other measures are necessary?

Eco modulated EPR fees will be a key element of dealing with plastic packaging. Without it companies have no incentive to move away from difficult to recycle packaging that may be cheaper (or just habit). It also takes responsibility away from the consumer who, even with the best of intentions, may find it difficult to choose the more eco friendly option due to location, finances etc. I hope that incentives will be as such that unrecyclable/composites/over packaging < recyclable < compostable < non single use.

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

NA

6.6 Consultation Questions – Single Use Plastics

• What measures could be considered to reduce the amount of single use food containers we use, taking the provisions of the Packaging Directive into account? Should a ban on non-reusable cups be explored?

The vision must be to remove all single use items where there is a reasonable alternative – i.e. there may not be reasonable alternatives in medical circumstances but there are reasonable alternatives for the vast majority food and beverage catering circumstances. With such a vision a ban on ALL single use items must be considered albeit possibly not the first step. Initial steps could include additional charges for single use items but essential that alternatives are available – either provided or own cup/bowl/plate accepted. It gets more difficult with single portion butters/jams etc – but this has also been solved – see Bewleys Grafton Street!

• Are there measures already in place that could be strengthened by legislation – for example, obligating retailers to give a reduction to consumers who use re-useable ware?

The model mentioned above is currently running in DCU catering, there are also many places giving discounts etc

• Do retailers have a role to play in exploring viable reusable food containers for on the go consumption?

YES – need to work with HAS to meet safety standard and devise workable solution – may not be easy initially but if the vision is set then need to work towards it.

• Are there additional products that are suitable for consumption reduction?

ALL single use

• What data is necessary for measuring consumption reduction of these specific products and any new products suggested?

Why not use existing purchasing data from vendors?

• The role of levies in reducing our consumption is well documented. However, in the case of plastic bags the levy was applied to a commodity which had previously been available for free. Given the range of prices involved for commodities sold in SUP food containers and beverage cups, do you believe a levy would affect behavioural change?

A levy is currently being implemented on all single use items in DCU catering outlets and while in the early stages it would appear to be having a significantly positive impact – i.e. single use items are reducing significantly.

• Are there other SUP items that cause litter and for which there are sustainable alternatives available, which Ireland should consider banning?

ALL single use

• What are the challenges faced by industry in ensuring caps are tethered on all beverage containers by 3 July 2024?

Not qualified to respond!

• What are manufacturers doing now to ensure all beverage bottles contain 30% recycled content? o What, if any, are the obstacles to achieving this? o Is there sufficient supply of recycled plastic

content to achieve this ambition? o To what extent is price a factor? o Is there scope for Ireland to be more ambitious and go beyond 30%?

Not qualified to respond!

• Can our current co-mingled collection model be enhanced in order to deliver a collection rate of 90% for PET beverage containers?

Not qualified to respond!

• Would you use a segregated bin just for the responsible disposal of single use PET containers?

YES

• What role can an Extended Producer Responsibility Scheme play in delivering on these targets?

Extended Producer Responsibility Schemes will be fundamental in creating a circular economy. Although targeting the consumer is important, putting the onus on those producing the waste in the first place for their product/service will have a far bigger impact. Although I'm aware we have some EPR schemes in place already I think they need to be ramped up to accelerate healthy amount of innovation and competition- ultimate goal should be for producers to implement models where single use isn't necessary.

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

NA

7.7 Consultation Questions – Circular Economy

• What are the areas with greatest potential for transformation in Ireland under the Circular Economy?

Office equipment and fitout – desk, chairs, filing cabinets.....

Bulky items: mattresses.....

• What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors?

Education and appropriate incentives/levies on waste.

• What might be a meaningful national waste reduction target and how could it be achieved?

Not qualified to respond!

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

NA

8.7 Consultation Questions – Citizen Engagement

• What campaigns would better assist householders and businesses in preventing and segregating waste properly?

Agree terminology for all – so if the bin is a general waste bin – then in all documentation it should be referred to as the general waste bin rather than black bin/residual bin/municipal waste bin

Colours of bins – agree colour of bins or lids and enforce across entire country – consider pictures on bins with images of what goes in bin.

Consistent lists for both work and home (i.e. cartons on home but not on work list from mywaste.ie) and across waste contractors – i.e. mywaste.ie indicated garden waste should go to civic amenity sites where the waste contracts (Oxygen/Panda) indicate that garden waste can go in the brown bin.

WEEE – more home collections with detailed info of what can go in WEEE – bulbs, headphones

• Should this be funded by Government or should the sector play a role in funding campaigns?

Sector should be involved

• Waste Collectors have a condition in their permits to maintain on-going communication with their customers in accordance with their customer charter. Do you agree that collectors are giving sufficient information to their customers in relation to separating waste into the 3 bins?

Absolutely NOT – see suggestion above. People usually have to search for information on what goes in each bin, this should be communicated to consumers at least annually by collectors.

• Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households?

Absolutely

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

NA

9.7 Consultation Questions – Construction and Demolition Waste

Not qualified to respond!

10.7 Consultation Questions – Textiles

• What measures would best support the successful collection of household textiles?

Facility for collection in local CASs – but also need education on reusing/repairing vs end of life textiles

• What measures would best support sustainable consumption of textiles by the general public?

Education/informing on alternatives – swap shops – repair shops/workshops – could be weekly/monthly workshops run in HEIs across country for student, staff and local communities.

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

NA

11.7 Consultation Questions – Waste Management Infrastructure

- *Should one national waste management plan be produced in place of the 3 current plans?*

YES – or at a minimum ensure consistent message across all.

- *Should the regional offices be set up on a statutory basis?*

Not qualified to respond!

- *Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded?*

Not qualified to respond!

- *Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?*

NA

12.7 Consultation Questions – By-Products

Not qualified to respond!

13.6 Consultation Questions – End of Waste

Not qualified to respond!

14.5 Consultation Questions – Exemptions

Not qualified to respond!

15.7 Consultation Questions – Extended Producer Responsibility

Not qualified to respond!

16.5 Consultation Questions - Waste Enforcement

- *What, in your view, are the factors leading to waste crime (please tick one box)*

• Ineffective enforcement by the authorities	
• Ineffective penalties	X
• Waste Market Factors	
• Lack of awareness	
• Other (please specify)	

- *Remaining questions*

Not qualified to respond!

17.7 Consultation Questions - Waste Data

• Do you believe it would be beneficial to have all/most waste data available on at least a quarterly basis?

Absolutely – broken down and online for easy access.

• Remaining questions

Not qualified to respond!

18.6 Consultation Questions - Research & Innovation

• What are the research areas you would consider to be important in developing a circular economy?

Communications

Behavioural Change

Economic/Business Models

• What new research programmes/initiatives do you think could be put in place?

Solutions focused demonstration and scaling

• What do you see as the main barriers/enablers to fostering a positive research culture around the circular economy?

Barriers: Current Economic/Business Models

Enables: Necessity !

• Do you think research on waste, resource efficiency and the circular economy could be better publicised and more readily accessible? How?

Yes – it should be quantified in terms of its impact with significant focus on the direct link between procurement and waste.

• What further incentives could be put in place to encourage research?

Resources for collaborative cross sectoral projects.

• Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

NA

19.7 Consultation Questions - Consumer Protection & Market Monitoring

Not qualified to respond!

20.7 Consultation Questions - Green Public Procurement (GPP)

- *What are the barriers to public authorities using GPP?*

A general lack of understanding and vision of where we need to get to.

- *How can business support more widespread use of GPP?*

Not qualified to respond!

- *What % target should apply to the use of GPP in Ireland?*

Not qualified to respond!

- *Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our green public procurement practices?*

Although there is a lack of understanding and direction around this (for example, reading the Climate Action Plan goals on this were quite vague in comparison to other sections) I definitely think this is a key area to tackle. Even if we don't have all the answers, we should do more here and learn along the way. The effect of GPP will have a huge trickle-down effect to suppliers. Sustainability criteria needs to be given as much weight as economic considerations.

21.7 Consultation Questions - Household Bulky Waste

- *What supports do consumers require to prevent bulky waste?*

Educate and inform on the potential for upcycling/recycling/repurposing

- *Are consumers willing to pay more to ensure appropriate end-of-life disposal for these products?*

YES (particularly because their disposal is infrequent- higher dumping cost is easily justified)

- *Should Government support investment in the recycling of large plastic items that are not suitable for domestic recycle collection?*

If the volume of such waste is sufficient could it be included for collection at CASs?

- *Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?*

NA

22.5 Consultation Questions - Bioeconomy

Not qualified to respond!

Major Summary Pts

Agree terminology for all – so if the bin is a general waste bin – then in all documentation it should be referred to as the general waste bin rather than black bin/residual bin/municipal waste bin

Colours of bins – agree colour of bins or lids and enforce across entire country – consider pictures on bins with images of what goes in bin.

WEEE – more home collections with detailed info of what can go in WEEE – bulbs headphones

Ensure unpackaged products are available in shops

Consistent lists for both work and home (i.e. cartons on home but not on work list from mywaste.ie) and across waste contractors – ie mywaste.ie indicated garden waste should go to civic amenity sites where the waste contracts (Oxygen/Panda) indicate that garden waste can go in the brown bin