

Public Consultation Waste Action Plan for a Circular Economy February 2020

Consultation Questions - Institutional Arrangements

- How are the current institutional waste prevention and management arrangements working and how could they be improved in your opinion? - **The HSE is in compliance with national waste legislation, and are developing our own healthcare specific guidance to promote waste prevention. As a result there is limited interaction between the HSE and Regulatory Bodies either at national and local level.**

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? **Pay by Weight should be mandatory for all Office of Government Procurement (OGP) Waste Frameworks. The OGP procure waste services on behalf of the entire public sector. The OGP Waste Frameworks should be zero landfill. Public Sector bodies should not be paying the landfill levy, as there is sufficient capacity for residual waste energy recovery in Ireland.**
- What further incentives could be put in place to encourage business to recycle more? **Private waste contractors are charging customers the landfill levy, but then processing the waste for energy recovery. Private waste contractors should only be allowed to charge the Landfill Levy if when they produce a Certificate of Disposal.**
- 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)? **No. Businesses will recycle/compost if it is more value for money.**

4.7 Consultation Questions – Food Waste

- 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? **The HSE (National Health Sustainability Office www.hse.ie/sustainability) have carried out lots of waste auditing and waste benchmarking in terms of healthcare food waste in Acute and Non Acute Hospitals. The HSE have produced our own healthcare specific guidance as a result. The OGP procure catering products for all Public Sector bodies including the HSE, so food waste prevention should be addressed at the OGP procurement stage.**

5.7 Consultation Questions – Plastic and Packaging Waste

- 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? **The OGP procure the majority of products for all Public Sector bodies, so plastic and product plastic and packaging waste prevention should be addressed at the OGP procurement stage.**

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 HSE (National Health Sustainability Office www.hse.ie/sustainability) produced its own guidance to help HSE Catering Managers to comply with the Government ban on SUP cups, cutlery and straws. The OGP procure catering products for all Public Sector bodies including the HSE, but the range of reusable catering products is limited, and the range of alternative compostable plastic products are limited and more expensive (based on previous limited usage). So although HSE Catering Managers want to comply fully with the ban on SUP Catering cups, cutlery and straws, alternative options from the OGP Catering Frameworks are limited and expensive by comparison.**

7.7 Consultation Questions – Circular Economy

- 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? **The public have difficulty understanding the term ‘circular economy’.**

9.7 Consultation Questions – Construction and Demolition Waste

- What other measures need to be put in place to encourage all players to prevent and recycle waste from construction? **Construction contractors should not be able to submit an Article 27 application to reclassify waste as a by product without the prior consent of the waste producer. And free training for Public Sector Construction clients on how to practically apply circular economy principles at the Construction project brief stage (using Government Contracts).**

20.7 Consultation Questions - Green Public Procurement (GPP)

- What are the barriers to public authorities using GPP? **The OGP procure majority of products for all Public Sector bodies including the HSE, so unless the OGP implement GPP in the 8 Key Procurement Categories, it is not possible for the HSE to procure sustainable products.**

National Health Sustainability Office
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