

Submission on Waste Action Plan for a Circular Economy

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1. General Comments /

Ireland was an early leader in the area of waste reduction, through such initiatives as the plastic bag levy. However, waste policy in Ireland does not seem to have capitalised on this good start and is not making or proposing radical enough changes. Recycling seems to still be a core strategy and while important it should not be the main part of a Circular Economy. The E.U and Ireland seem to have latched on to the idea of a circular economy as a wonderful solution that will allow us to keep going with business as usual. If we recycle everything we can keep all our consumption industries going. However the definition of a circular economy is so much more than this *“a circular economy aims to redefine growth, focusing on positive society-wide benefits. It entails gradually decoupling economic activity from the consumption of finite resources, and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital.”* {Ellen MacArthur Foundation}.

While I appreciate That the Waste Action Plan might not seem to be the place to critically review our lifestyles and how and why we consume the way we do, I think it presents the perfect opportunity to do so. The waste mountains we produce are the most visible and tangible outputs of the destructive way we have been living. We can't easily or readily see carbon emissions, or declining species and biodiversity loss, or depression and discontent. It is much easier to engage with something tangible than with something that isn't there or can't be seen – this is evident from the huge social engagement with the plastics pollution problem. I think the Waste Plan should grasp this opportunity and be radical. It should address the circular economy as it is defined – decoupling economic activity from the consumption of finite resources. To do so, much more stringent requirements will have to be placed on the producers. Currently producers are only concerned with economic gain. If products packaged in finite resources are not available they will not be consumed. We can't simply leave it to consumer choice - we consumers, even those who are consciously trying to do the right thing don't always make good or informed choices. Just because consumers are used to a certain way of living and having access to certain products and conveniences doesn't meant they have a right to them. This is an opportunity to lead the way, force a change, educate producers and consumers alike. It will be argued that some of my answers are too radical and that by Ireland leading the way on this will cause economic suffering. I would argue that on the contrary, if we show leadership as a small country it may be that others will follow. Some economic suffering now is a small price to pay. If we don't tackle this now our suffering will be so much greater in not that many years to come.

We need to focus on the following as part of the hierarchy of waste management before we look at recycling:

- Reframing (a paradigm shift in how we consume and think we should consume)
- Education
- Prevention
- Reduction
- Reuse
- Repair

Recovery of energy should not be considered recycling and should not be set against our recycling / reuse targets.

Institutional Arrangements

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

1. Municipal Waste

Questions for consultation:

- 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?

Regulations should be put in place to make the producer pay. The average consumer can do only a limited amount about the waste they generate. The regulations should stipulate according to current best practice what types of packaging should be used. The principle of packaging should be that using none should be best, then packaging from renewable sources and re-usable packaging, only allowing packaging from non renewable sources where no other alternative can be found and the item is a necessity. Producers should then be charged based on the type of packaging they use. This could arguably impact the way we currently produce goods and perhaps be too great a cost for some producers current business model. That is not a reason not to adopt this model. Currently the real cost of products we consume is externalised and paid for in our environment. Making the producer pay would encourage local production and prevention of waste.

- What measures or practices are currently in place that could be improved?
- What other new measures or practices could be put in place?

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

1.1. 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?
Not really – the pay by weight system is not granular enough – the bands are too wide. Many people still do not separate waste properly, many still don't know what should go into what bin. This is not helped by having different waste collection companies – all with slightly different rules and slightly different ways of communicating them, We need a standard country wide – one set of rules for waste separation.
We also need to start penalising people for incorrect segregation of waste – notices on bins, ramping up to fines for repeat offences, non collection until fines are paid.etc,
- 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? **Yes**
- 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? **Yes** 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?
- What can be done to improve recycling (including organic waste) in apartment complexes? **Landlords to provide clear instructions. Landlords to provide small internal bins for different types of waste (organic, recycling, other). Community biodigester. Community compost maker.**
- 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?

1.2. 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? **Absolutely – I wasn't aware this was not the case.**
- What further incentives could be put in place to encourage business to recycle more?
Penalties if waste is not in the correct bin.
Provision of proper bins – a local business told me their waste company will only provide them with the household brown bin, they won't use this because it gets so full that it attracts vermin. They want a large brown bin on wheels similar to the other bins they have but the waste company will not provide.
Education

- 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)?
- 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?

Many businesses (in my experience – shops and petrol stations) do not separate waste at all. Those that do – only attempt to separate in ‘ the back of house’ processes – ie, in the deli etc, They make no provision to allow customers to separate their waste – usually only having one bin. This is despite the fact that many of them have transitioned to biodegradable coffee cups which are now going to landfill.

Some I have spoke to believe that because they are members of Repak that this is ok. And that they do not have to separate waste. Some I have spoken to are paying the fee for Repak but have no actual idea what it does or how paying this fee is doing anything, I sent an email some time ago to Repak asking to understand exactly how this system works but got no answer.

2. Food Waste

Questions for consultation:

- What are the underlying causes of food waste in Ireland?
- Should Ireland introduce a national prevention target in advance of a possible EU target?
- How can Ireland become a ‘farm to fork’ global leader in food waste reduction?
- 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?

A lot of the food waste happens in the production process before it ever gets to the consumer. Much more transparency around this is needed. We need to understand how and why this is happening. The cost of the food produce needs to reflect its full cost which includes the full carbon cost of production, packaging and waste. Just like any other product the producer needs to be levied a charge to reflect this – a lower charge for more sustainable produce.

Packaged food

One of the biggest problems is that fresh produce comes prepackaged, in multipacks that might have helped retailers to avoid food waste during transport and in their shops but transfers the responsibility to the consumer to buy a larger amount (not exactly the needed amount) and deal with the possible food waste. No research on the impact of packaging on food after opening

appears to be available. Clarity is needed if packaging over fresh produce really prolong the lifetime of the product and save food waste.

It should be also required that packaged food cannot be cheaper than the loose equivalent.

Package free shops/sections should be encouraged by the Government.

Best before date

Remove best before dates from all food to eliminate confusion about when something is potentially unsafe to eat.

Retailers

The Government should bring in similar legislation to what was implemented in France and forbid retailers and restaurants from throwing out edible food or at least set challenging limits for food waste and price waste collection such as to encourage waste minimisation.

Placing on the market rejected fresh produce by the retailers.

A mechanism to help farmers to sell fruit and veg rejected by retailers to other outlets should be explored. Like the odd box system in London <https://www.oddbox.co.uk/>

Farmers markets and Community supported Agriculture

Looking at the root of the problem, food waste and packaging waste could be avoided if local farmers would get more support to grow fresh produce locally. People would eat more seasonal and locally grown vegetables and fruit.

Stopfoodwaste.ie

Stopfoodwaste.ie is a great initiative and it should be rolled out more intensively all over the country and highlight to people that saving food means also saving money on food and on waste disposal.

Tech to reduce food waste

Apps like TooGoodToGo should be encouraged to launch in Ireland and cafes and shops should be encouraged to work with Olio as they do in the UK.

Hot food counters

Hot food counters are really wasteful with the 90 mins timeframe to sell the food, freshly made food should be encouraged more.

Education

In schools, workplaces. People don't know about the extent of food waste or how they are contributing to it.

Brown bin Provision

Most apartment complexes can't access brown bins. It should be made obligatory for management companies to introduce brown bins or onsite composting facilities for residents. Waste management initiatives like Access Green should be incentivised to help a smooth transition for waste management companies.

Areas with houses that do not have access to brown bins should be provided with a communal composting facility (that can take cooked foods and meat / dairy etc). Many houses in rural areas are not provided with brown bins for some inexplicable reason. This needs to be rectified, all houses should have a brown bin or easy access to community composter.

3. Plastic and Packaging Waste

Questions for consultation:

- How can we make it easier for citizens to play a role in delivering on our targets?
- Do waste collectors have a role to play?
- What is the role of retailers?

Vending machines

Retailers should be incentivised / mandated to provide refill vending machines for water, milk, shampoo, washing-up liquid, laundry liquid.

- What is the role of manufacturers?

Only recyclable packaging

Only recyclable packaging with an existing market for the recycle should be allowed onto the market, unless there is a medical reason for the non-recyclable packaging. Any amendments to the packaging like dye, labels, lids or sleeves that render the material non-recyclable should be banned.

Until this ban on non-recyclable packaging comes into effect companies putting non-recyclable packaging on the market should bear the full cost of segregation of non-recyclable packaging from recyclable packaging in green bins.

Extended Producer Responsibility schemes

EPR schemes should focus first on preparation for reuse not only on disposal and recycling. EPR should be set up so that it is more expensive to place certain products on the market than cleaning it up.

- Is there a role for voluntary measures (individual or by sector) and if so, what might they be?
Education in shopping, food preparation, understanding waste. Community Co-ops - zero waste shops etc.
- Are there targets other than the EU that we should be striving towards?
- 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 fees should be rolled out for packaging - significantly higher fees for non recyclable packaging materials to really encourage people to move to the easily recyclable materials.

Increase recycled content in packaging

Tax should be implemented on virgin plastic to incentivise the use of recycled plastic. Targets should be set on recycled content in plastic items.

- 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?

Reusable containers

The Food Safety Authority should publish clear guidelines on container reuse for customers and retailers and legislators should clarify issues in relation to liability. Once these guidelines are in place retailers should be obliged to accept consumer's own containers or offer a returnable container scheme.

Deposit Return Scheme

Plastic bottle deposit schemes have been shown to increase the use of plastic in packaging in Germany. If such a scheme is introduced in Ireland it should be done in such a way as not dissuade people from reuse or more sustainable packaging options as a first option. Reuse of your own containers or reusable containers should be the number one priority. Plastic bottle deposit schemes may have a function in transitory locations like train stations or airports.

Water Refill

Prominent and regular water refill points should be provided on a nationwide basis. All cafes and restaurants should be incentivised / mandated to refill water bottles for citizens where refill points aren't feasible.

Plastic recycling facilities

Plastic recycling should be made more indinegous in Ireland, there are no proper plastic recycling facilities set up in the country, we export most of our plastic packaging abroad.

4. Single Use Plastics

Questions for consultation:

- 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?

All non-medical single-use is a waste of resources regardless of what material is used. I propose that all single-use plastic items that are not medically necessary should be banned. Also all single-use compostable items should be taxed or levied for example compostable coffee cups and takeaway containers as we have to move away from the disposable lifestyle. There should be an obligation that retailers give a reduction to consumers for using their own reusable containers for shampoo, cleaning products and also for food products. Policy needs to be constructed so that reusable items are always the most economical choice for businesses and citizens.

What is plastic?

Single Use Plastic Directive (EU 2019/904 on the reduction of the impact of certain plastic products on the environment) talks about single use plastic items, but it does not clarify what exactly falls into the category of plastic, it is important to have clear information on this. Recent Eunomia report - What is Plastic? Report is available here:

<https://www.eunomia.co.uk/reports-tools/what-is-plastic-full-report/>

- Are there measures already in place that could be strengthened by legislation – for example, obligating retailers to give a reduction to consumers who use reusable ware?
- Do retailers have a role to play in exploring viable reusable food containers for on the go consumption? Yes a scheme like Ri Cup the reusable borrow system could be used.

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

Yes, disposable nappies and menstrual products.

Cloth nappies, cloth sanitary towels and menstrual cups are all very viable and cost effective products in reducing large amounts of single use (and hazardous) plastic waste that ends up in landfill.

Cloth nappies

Approximately 60,000 babies are born in Ireland each year, and the average age of potty training is about 2.5 years. Babies and toddlers are changed between 6-12 times a day. Even taking the lowest number on that scale that is 131,400,000 nappies a year for just that one year of babies. Multiply that by 2.5 years and increase it by the next 60,000 babies the following year etc. That's a huge amount of single use plastic and human waste going to landfill.

The clothnappylibrary.ie is an independent voluntary group that provides education on cloth nappies. Many of the families that choose cloth nappies move on to use reusable menstrual products too. Information about cloth nappies and also the availability of a cloth nappy loan from the cloth nappy library should be made available to parents to be at antenatal classes, hospital appointments, hospital information packs, Public health nurse visits and doctors' surgeries.

Local tidy towns or the Public Health Nurse should be given funding to encourage the use of cloth nappies similar to in the UK. In the UK families can receive a voucher that they can redeem with any local cloth nappy retailer. There is misinformation circulating that cloth nappies have a higher carbon footprint than disposable nappies. The following study shows this is incorrect in all but one instance

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291130/scho0808boir-e-e.pdf

Wet wipes - like cloth nappies many people are using cloth wipes, in a container with boiled water and a little coconut oil or similar are very effective.

Unwrapped soap bars – no shower gel bottles.

Leaf tea.

The following products could be packaged in paper bags similar to the way flour and porridge oats are now (pasta, rice, breadsoda, yeast, nuts, seeds, lentils, beans, barley, soup mix, and others)

- What data is necessary for measuring consumption reduction of these specific products and any new products suggested?
- 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 behavioral change? **Yes, I think if it was made clear that there was a levy it would work. Currently some places offer a discount for re-usable cups – it would work better if it was phrased as a levy for the single use items.**
- Are there other SUP items that cause litter and for which there are sustainable alternatives are available, which Ireland should consider banning?
Tea bags made of plastic
- What are the challenges faced by industry in ensuring caps are tethered on all beverage containers by 3 July 2024?
- What are manufacturers doing now to ensure all beverage bottles contain 30% recycled content?
 - What, if any, are the obstacles to achieving this?
 - Is there sufficient supply of recycled plastic content to achieve this ambition?
 - To what extent is price a factor?
 - Is there scope for Ireland to be more ambitious and go beyond 30%?
- Can our current co-mingled collection model be enhanced in order to deliver a collection rate of 90% for PET beverage containers?
- Would you use a segregated bin just for the responsible disposal of single use PET containers?
- What role can an Extended Producer Responsibility Scheme play in delivering on these targets?
- 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?

5. Circular Economy

Questions for consultation:

- What are the areas with greatest potential for transformation in Ireland under the Circular Economy?
- What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors?
- What might be a meaningful national waste reduction target and how could it be achieved?

- 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?

Currently there is very little understanding of circular design principles in Ireland. I welcome the existence of the Circular Academy by the Rediscovery Centre and Circulareire by Irish Manufacturing Research. A programme to bridge the gap between these programmes and design education is needed.

Until such a time as a buy / take back scheme for goods is in place and working effectively, government will have to fund eco-design initiatives to incentives R&D investment for companies.

All economic sectors in Ireland have to be transformed into circular sectors and the different sectors should have individual circular economy plans that are linked across sectors. The Circular Economy only works as a framework for the transition of the entire economy and not just single sectors. A transition away from our current linear economic system has to be based on the zero waste hierarchy (prevention of waste and overproduction, preparation for reuse, recycling of what cannot be reused, recovery of all material that cannot be recycled, disposal of a minor fraction of the remaining material) and should include:

- The right to repair and provisions for encouraging repair and reuse over recycling and recovery, such as at the product and service design stage, VAT exemption on all repair activities, producer warranty of 5 years on consumer products, provision of repair guides on all consumer products, provision of spare parts for at least 10 years after production etc.
- Product design for durability, repairability and with final material disposal in mind.
- EPR schemes to favor reuse and repair over recycling.
- Taxing material consumption, not income.
- A levy on virgin materials, e.g. virgin plastic.

On an individual level, leasing, renting and sharing products should be encouraged over buying new. Libraries of Things should be set up by local Councils similar to traditional libraries for books. Environmental costs of production, use and disposal for every product should be reflected in its price and not be externalised by the producer onto society. This will increase the value of durable and repairable items and decrease the demand for cheap, single-use items. All single use consumer items should be levied or banned, not just single-use plastic, as only this encourages changes in consumer behaviour.

Reuse and Repair

The full cost of dismantling and recycling items should be included in the cost of an item, resulting in hard to disassemble / recycle items costing more. When an item is at the end of its functional life a citizen could return the item to the retailer that it purchased the item from. Companies putting items onto the market would have to keep a bond with the government to cover the cost of disassembly / recycling should they go bust. Legislation would be required to prevent these items from being shipped outside of the country for recycling / disposal.

Reuse should definitely count towards our waste minimisation targets and should be prioritised over recycling. The WEEE legislation has been shown to reduce reuse in electrical and white goods. We need to be careful not to replicate this issue in relation to bulky goods. A target for reuse and resale would help achieve this.

Second-hand, retailers' responsibility

Retailers of new goods should be incentivised / mandated to sell a percentage of second-hand goods / clothing. Retailers / producers must be obliged to buy / take back any goods they put onto the market, for resale in stores. Retailers should be obliged to collect bulky items from the citizens home. The cost of providing this service should be included in the retail price of the goods. To discourage wasteful consumption by citizen retailers would be obliged to charge a sliding fee for returns within a set timeframe after purchase.

Retailers would have to keep a bond with the government to cover the cost of collection, disassembly and recycling should they go bust. Retailers without a physical presence in the country would be obliged to partner with a company in Ireland who would collect and either resell or disassemble and recycle their goods. Such a buy / take-back scheme would do away with the need for a labelling system for eco-goods as retailers / manufacturers putting long-lasting repairable goods onto the market would ultimately pay less in disposal costs.

Repair

All repair services and replacement parts should be charged at 0% VAT.

6. Citizen Engagement – Awareness & Education

Questions for consultation:

- What campaigns would better assist householders and businesses in preventing and segregating waste properly?
- Should this be funded by Government or should the sector play a role in funding campaigns?
- 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?
- Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households?
- 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?

It is necessary to organise a multi annual campaign on waste reduction with all the stakeholders. It could be on a national or local level. The Government could allocate some funding for local authorities to run 'zero waste' programmes. Help people to understand their waste, run waste audits, point out to them what can be recycled, what not, what they could do to reduce their waste generation. A great example is the French town, Roubaix where in 2015 100 families engaged in a 50% waste reduction over a year, by providing workshops on home/community composting, menstrual pad making, proper recycling and repair cafes and inviting local farmers to sell fresh produce directly to the citizens, the case study can be downloaded here: <https://zerowasteurope.eu/downloads/case-study-8-the-story-of-roubaix/>

7. Construction & Demolition Waste

Questions for consultation:

- What other measures need to be put in place to encourage all players to prevent and recycle waste from construction?
- What existing measures are in place that could be improved?
- What changes could be made to environmental and/or planning legislation to facilitate more recycling of construction waste?
- What incentives could be introduced to increase the use of recycled materials?
- Should levies be applied to the use of virgin material where a recycled material is available as an alternative?
- How can site managers be encouraged to ensure more on-site segregation?
- What financial incentives / penalties could be introduced to encourage better waste management practices?
- What are the best approaches to raising awareness and education?
- What are the barriers/enablers to these measures?
- 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?

8. Textiles – Waste and Recycling

Questions for consultation:

- What measures would best support the successful collection of household textiles?
- What measures would best support sustainable consumption of textiles by the general public?
- 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 proper designing of garments is one of the most crucial aspects for avoiding textile waste. Garments should be designed to be durable, be repaired and labeled with information on best care, expected lifetime and origin (how often can it be washed, where were the various parts of the garment produced, how much GHG emissions were produced during production, how should a product be disposed of). Virgin material should be taxed, which could help the textile industry to move away from disposable and cheap clothing.

Education in schools and workplaces around clothing and style, what really represents style, how cheap clothing is NOT style, upcycling, repair, reimagining, secondhand and vintage.

Events to celebrate reuse and repair and better clothing,

Awareness through technology – use of the GoodOnYou App which rates brands based on their sustainability and other categories.

Regulations around online clothing companies – rumour has it that returns are not returned to shelf but are consigned to landfill. If this happens in Ireland it needs to be banned and penalised.

Micro-fibres

As soon as an integrated micro-fibre filter for washing machines has been developed all washing machines sold in Ireland must be required to have one to avoid micro plastics infiltrating our water resources from our clothing.

9. Waste Management Infrastructure

Questions for consultation:

- Should one national waste management plan be produced in place of the 3 current plans? **Yes probably, we need all Ireland standards and practices**
- Should the regional offices be set up on a statutory basis?
- Should the State assist in funding the development of indigenous waste recycling facilities? **Yes** If so, how should this be funded? **By a charge on the producer in line with the actual environmental cost of their product and packaging. Better designed products and packaging will attract a much lower charge. These charges may get fully or somewhat passed on to the consumer. That will allow consumers to choose products based on the 'real' cost of that product. There should be legislation passed to prevent retailers and producers selling goods below cost, the concept of loss leaders should be legislated against. We need to take responsibility for our choices and understand the real cost of them. If this sounds too radical -we have to remember we have an emergency,**

- 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?

10. By-Products

Questions for consultation:

- How do you think the By-product process could be improved?
- Do you support the introduction of fees to assess by-product notifications?
- 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?

11. End of Waste

Questions for consultation:

- Should the Government seek to establish a group to apply for national End of Waste decisions for appropriate products e.g. Aggregates, Incinerator Bottom Ash?
- If yes:
 - what expertise would be necessary for such a team,
 - who should be represented,
 - are there other materials which you believe are suitable for national end of waste decisions?
- 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?
- 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?

My answer:

12. Exemptions

Questions for consultation:

- Are there particular waste streams which you think might be suitable to the 'exemption' approach described above, for example, the on-site controlled incineration or deep burial of Invasive Alien Plant Species? Which other waste streams could or should be considered in the context of an 'exemption' approach?
- In your opinion, what are the dangers/risks or advantages associated with an 'exemption' approach?

- 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?
I wasn't aware of there being an exemption approach. On site disposal sounds sensible in relation to invasive alien plant species, but can't think of any other application but I imagine there might be. It sounds like a system that could easily be open to abuse.

13. Extended Producer Responsibility (EPR)

Questions for consultation:

- How is the new EPR infrastructure going to impact on Ireland's existing EPR structures?
- How do we ensure Ireland's existing producer responsibility initiatives are in a position to adapt in response to the EU legislative changes for EPR models?
- How do EPRs help Ireland achieve our targets?
- How do we influence decisions made at the product design stage to ensure circular design principles are put in place? **By having the producer pay the full environmental cost of the product and its packaging**
- How could modulated fees be best introduced to drive change and transform our approach to waste in line with modern, circular economy principles?
- Primary focus is on introducing the new EPR schemes as outlined in the SUP Directive but are there other waste streams that would fit with the EPR model?
- Is there a role for voluntary agreements with industry?
- What mechanisms will bring the entire supply chain and waste management systems together to share solutions?
- Looking at the example of WEEE, retailers now play an increased role in collection, is this approach suitable for other potential EPR waste? If so, what areas?
- 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?
I think EPR is definitely the way forward. I think the long term strategy needs to be brought forward and implemented sooner.

14. Waste Enforcement

Questions for consultation:

- What, in your view, are the factors leading to waste crime (please tick one box)
 - Ineffective enforcement by the authorities
 - Ineffective penalties
 - Waste Market Factors
 - Lack of awareness
 - Other (please specify)

- What measures are required to respond to the links between waste crime and other forms of serious criminal offences, such as organised crime?
- What changes could make the regulatory or industry response to serious and organised waste crime more effective?
- Are the penalties available under the Waste Management Act appropriate?
- What other penalties could be considered for illegal dumping by households/members of the public
- Are there examples of existing good practice to prevent illegal dumping?
- What contribution to the cost of the enforcement system should the waste industry make?
- Should financial provision be a requirement for permitted waste facilities?
- 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 idea of a circular economy is to see 'waste' as a resource. We cannot fully get away from packaging for our food, but this plan should take the opportunity to promote bulk buy stores, zero waste refill stores, packaging from renewable sources and biodegradable packaging. Our 'waste' would then largely be unavoidable food waste, biodegradable packaging, glass, cans, and perhaps a very small amount of unavoidable recyclable plastic packaging.

Each community should have a community owned biodigester (or whatever is best practice technology). As owners of the biodigester scheme residents will be incentivised to use this resource for their biodegradable waste. It should be made easy for non permanent residents to participate in a fair way in the scheme.

15. Waste Data & Waste Flows

Questions for consultation:

- Do you believe it would be beneficial to have all/most waste data available on at least a quarterly basis?
- What resources are needed to validate this data more quickly and what are the barriers?
- How would you balance the need for validated reporting data for EU reporting against the desire for more up to date statistics?
- Do you believe that all waste should and could be tracked from site of creation to final destination?
- Are there confidentiality or other issues for industry in reporting on waste flows?
- What changes need to be put in place to facilitate better reporting?
- What uses can be made of having more detailed, accurate, timely data?
- What penalties should be in place for the non-provision of data?
- Should there be voluntarily reporting on particular waste streams and its treatment destination prior to legislative changes being put in place? **Yes**

- 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?

My answer: If the aim is to encourage the general public and business to reduce their waste and move towards a circular economy transparency is crucial. All waste (household and commercial) data should be available online on at least a quarterly basis publicly including generation and final destination/treatment (even if it is outside the country). There is so much mystery where actually our waste ends up.

The cost of capturing all of this data will not be insignificant. Cost benefit analysis should be applied. Producer pays principal should be applied. Technology to help capture data should be used.

16. Research & Innovation

Questions for consultation:

- What are the research areas you would consider to be important in developing a circular economy?
- What new research programmes/initiatives do you think could be put in place?
- What do you see as the main barriers/enablers to fostering a positive research culture around the circular economy? The main barrier I see is that this plan does not embrace a complete change in our economy. It seems to see the circular economy as a solution to allowing all the same current industries continua as usual. I forsee that there will and should be many business closures, global will become local, the way we work and what we work at will change, career opportunities will arise out of areas we haven't even thought of yet. Research should focus on building natural and social capital.
- Do you think research on waste, resource efficiency and the circular economy could be better publicised and more readily accessible? How? Yes, in main stream media, in schools and workplaces.
- What further incentives could be put in place to encourage research?
- 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?

17. Consumer Protection & Market Monitoring

Questions for consultation:

- The CCPC recommended the establishment of an economic regulator for household waste collection.

- In your opinion, should an economic regulator be established? In considering your reply it is recommended you consider the detailed rationale set out in the CCPC report, available here.
- If a regulator was to be introduced what powers should the office have? Should they be confined to economic powers?
- Should a new office be set up or should the powers of existing regulator be broadened?
- What alternatives are there to setting up a regulator, for example, improved regulatory oversight for customer's complaints?
- Do you believe the information currently available on kerbside waste collection pricing could be improved, and if yes, how?
- Do you believe that the information prepared by the Price Monitoring Group is useful? If No, what changes would you like to see?
- Given that the last time flat rates fees were identified was July 2018, do you believe the work of the Group should continue?
- Would you support the Group undertaking whole of market monitoring including publishing prices for household waste collection for all collectors in all areas?
- Do you believe there needs to be further oversight of the waste sector from a consumer rights perspective?
- Do you believe that a consumer complaints body should be out in place?
- If yes, what powers would such a body have?
- Should it be included within an existing body e.g. CCPC or the National Waste Collection Permit Office?
- Is further regulation from a consumer perspective of the sector needed?
- If yes, what measures do you see as necessary for further regulation or what legislation needs to be strengthened?

My answer:

18. Green Public Procurement (GPP)

Questions for consultation:

- What are the barriers to public authorities using GPP?
- How can business support more widespread use of GPP?
- What % target **should apply to the use of GPP in Ireland?**
- **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?

19. Household Bulky Waste

Questions for consultation:

- What support do consumers require to prevent bulky waste?
We need engineered obsolescence to be penalised. Producers should guarantee their products for a stipulated length of time.
We consumers need education to change mindset, to get away from the throw-away economy. Just because I'd fancy a new bed and new wardrobes doesn't mean I should actually get them. Advertising has a large part to play. If we are serious about treating the environmental crisis as an emergency and have any hope of keeping the planet habitable for our children then much more serious measures need to be taken.
- Are consumers willing to pay more to ensure appropriate end-of-life disposal for these products?
I certainly am. We should be paying the true cost of an item – from cradle to grave and including the carbon emission costs of sourcing the materials, producing the item and disposing of it. The cost of appropriate disposal should be built into the cost of purchase.
- Should Government support investment in the recycling of large plastic items that are not suitable for domestic recycle collection?
Yes? We should investigate best practice for these items in other countries. Ideally we need to promote manufacture of these items from non plastic renewable sources. Currently all natural resource products are twice as expensive as their plastic alternative. It should probably be the other way around. Try looking for a natural fibre mattress and you will see they are twice or three times the cost of a standard foam mattress. Again the cradle to grave and carbon emission cost of these items should be in the purchase price. If they actually cost their true amount (instead of externalising the cost) then people would buy less and re-use, and items made from renewable sources would be more affordable in comparison. The producer should have to pay part of the price into a government fund to pay for the disposal.

Producer Responsibility Initiative for mattresses and furniture should be mandatory not voluntary.

Reducing Vat on repair and re-use is a good idea.

You say "Social enterprises are active in the areas of mattress recycling, furniture reuse and upcycling however the market is not fully mature to allow scaling up for sufficient impact" – I'm not sure if I understand this – surely we can educate and create initiatives to scale this up? I recently paid €30 to a mattress recycling enterprise so that a very old mattress wouldn't end up in land fill. Not everyone will be willing to pay and we will end up with more dumping. More cameras to catch people dumping and publication of prosecutions would deter people and make them realise they have to take the correct route and pay for what they consume. For example Kildare County Council recently informed our Tidy Towns group that they had caught with covert camera several people

dumping large items at our Tidy Towns collection point. They told us they will be prosecuted, but of course we will hear no more about it. If we could get confirmation of numbers prosecuted (obviously not names) and spread that information then that might prove educational.

A paid collection service for large items could also prevent dumping.
Genuine inability to pay needs to be catered for.

- 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?

20. Bioeconomy

Questions for consultation:

- What kinds of activities to increase the financial support for bioeconomy development in Ireland?
- Are current policy options in relation to innovation & enterprise policy instruments suitable or sufficient to address the development of systemic and cross-cutting bioeconomy approaches, business models and new value chains?
- How best to develop a value chain approach to link bio-based actors, value chains and territories?
- 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?