

Submission to Department of Communications, Climate Action & Environment Waste Action Plan Consultation

2. Institutional Arrangements

- The fact that there are three Regional Waste Management Planning Offices and three Waste Enforcement Regional Lead Authorities would be a concern in terms of the risk of duplication of efforts in some areas and gaps in others. It's not always clear under which licence a waste contractor is operating and which licence a new waste operation needs to apply for.
- Generally I think the waste management industry and the recycling companies in Ireland need to be viewed as stakeholders in the formation of any new waste management plan and engaged with as such. The global market for recyclables is a commodities market over which the Irish industry, be it waste management companies or plastics recyclers, has little if any control and the complexities of managing waste and recyclables need to be better understood.

3. Municipal (Household and Commercial) Waste

- Target for waste collectors to achieve the recycling rates envisaged could be viewed as too blunt an instrument, which needs to be refined into specific sectors with higher rates for those items which are easier to collect and re-process/recycle such as plastic bottles, and lower rates for more difficult-to-recycle plastics.
- 3.7 One of the main barriers to achieving higher rates of recycling is the lack of demand for recyclates; while the cost of virgin materials remains lower than recycled material, manufacturers are unlikely to switch to using recyclates in their production lines. The real cost of virgin material, particularly plastic, is simply not reflected in its price, in the absence of a carbon tax on the producers of the virgin material.

5. Plastic and Packaging Waste

- Waste collectors have a role to play in terms of improving the packaging and plastic waste recycling targets, but again it goes back to understanding the complexities of how plastics and other "waste"/resources are traded. It should also be recognised that Ireland may simply never generate the scale or volume of certain types of materials to warrant setting up recycling facilities for them and shipping materials abroad is likely to continue for the foreseeable future.

6. Single Use Plastic

- 6.6 A ban on non-reusable cups and other items should be explored. The range of "bio-degradable" and "compostable" cups being peddled by many outlets, as somehow being a more environmentally friendly alternative, is a nonsense. The infrastructure simply doesn't exist for these types of cups to be composted, so probably in excess of 90% of them are going to landfill or incineration. An example is DLR CoCo market in Dun Laoghaire every Sunday; while many of the food stall operators are now

selling their food in “bio-degradable” and “compostable” containers, the only bins provided in the Park are black bins i.e. municipal waste.

- Retailers could look to the pilot programme in Freiburg where consumers pay a small deposit for a reusable cup which is then accepted at any number of retail outlets across the city. (Link [here](#).)

7. Circular Economy

- 7.7 It's not going to be possible to make every part of the economy circular but we could be trying harder, but greater engagement with a wide range of stakeholders is necessary.

8. Citizen Engagement

- Citizens generally are still unaware of what happens the waste once we put it in one of our two or three bins and lack understanding, or are simply disinterested, of the effect downstream of putting the wrong items into the wrong bin so standard stickers would probably help somewhat.

10. Textiles

- There needs to be better awareness generally about the need to stop putting textiles in black bins and demonstrate to citizens the value that can be generated by donating textiles to charity shops. The Irish Charity Shops Association and the charities that run shops are vital stakeholders in terms of how to better engage with citizens about this issue.

11. Waste Management Infrastructure

- 11.7 A national waste management plan is a good idea but with a relatively large number of private waste management contractors, who have varying levels of engagement, this could be difficult to implement.
- If carbon tax was to be hypothecated, then the State could possibly consider investing some of this fund in indigenous waste recycling facilities but only where the scale and volume of material is warranted.

13. End of Waste

- 13.6 The categorisation of waste can be a major barrier to companies who want to investigate the possibilities for reuse and recycling of these materials, but who themselves are not registered waste contractors.

16. Waste Enforcement

- Ineffective enforcement by the authorities is the main reason for waste crime, in my opinion and An Garda Síochána should be funded sufficiently to investigate waste crimes.
- Getting householders/members of the public who litter, dump items illegally or disregard waste rules generally to work in a waste facility and to pick up litter for a few days might prove to be a deterrent against this type of unacceptable behaviour.

17. Waste Data

- 17.7 It would be beneficial to have waste data reported on in greater detail and on a more timely basis, especially when the global market (referenced previously) can move quite quickly in terms of pricing.
- It would be useful to have better tracking of waste as it moves through the waste management process but there is likely to be a cost to this which will be charged back to the consumer.

20. Green Public Procurement

- 20.7 Despite the presence of guidelines there seems to be very little awareness by public sector agencies generally about GPP rules. The % target should be 100% by a certain date e.g. by end 2030, with milestones to achieve in the interim.