



Feedback on the Public Consultation Waste Action Plan for a Circular Economy

Psychologists for Social Change (PSC) is a network of more than fifty applied psychologists, academics, therapists, psychology graduates and others across Ireland who are interested in applying psychological theory to policy and political action. We believe that people's social, political and material contexts are central to their experiences as individuals. Our work is to apply psychological theory to public and policy debates in order to increase their efficacy. Our commentary and analysis regarding the proposed Waste Action Plan for Ireland is based on our knowledge of human behaviour, mental processes around change, and population health. We are submitting this document because we have considerable expertise in this area, and also because we encounter the stress and distress that people are experiencing around the issue of climate change. We support the efforts of the Irish government to improve the current system of managing waste and we see the potential to change attitudes and behaviours among citizens to support a more circular waste economy.

There is growing evidence that climate change is negatively impacting people's mental health - both in terms of the psychological impact of immediate threats to their well-being (e.g. adverse weather events, and major disasters such as the Australian bush fires) and in terms of projected threats, as plans to mitigate the future impact of climate change appear to be falling consistently short of what is needed ([e.g. Mental Health and Our Changing Climate: Impacts, Implications, and Guidance](#), APA, 2017). Impact on mood and anxiety levels are paramount, and helplessness and resignation are growing. In addition and of particular relevance to this public consultation are concerns about impact of immediate poor environment, e.g. air quality, water quality, and the direct impact of poor waste management on people's psychological well-being (e.g. Wyles, Pahl, Thomas, & Thompson, 2016). Many people wish for a better future, but are struggling to find their way within a system that does not currently support or reward best practices around reducing, reusing, recycling and composting.

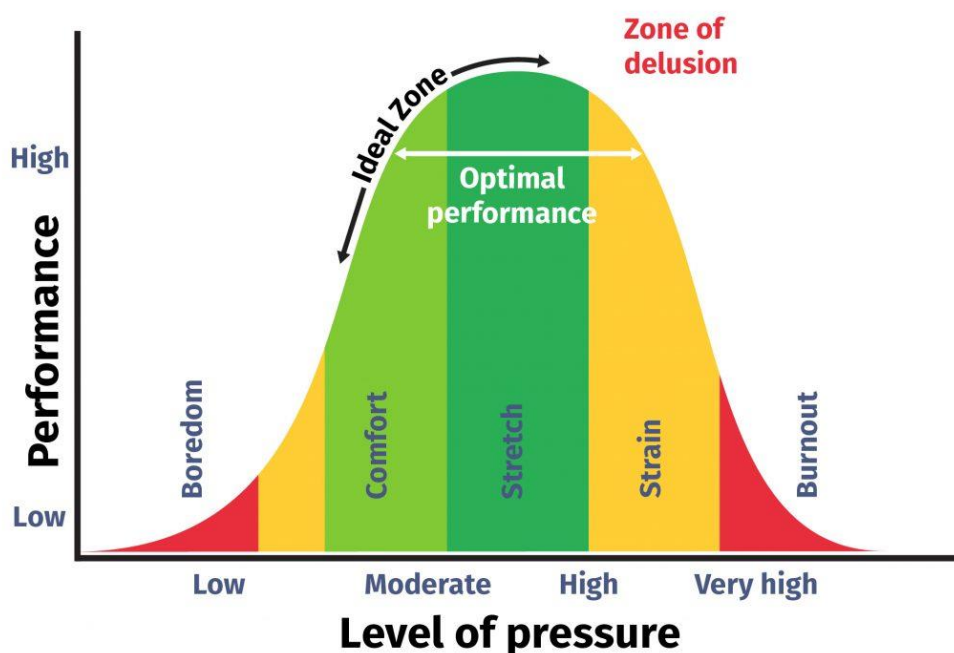
Rewarding behaviour that you want repeated is a fundamental principle in behavioural psychology. It is a well established approach that works well. Rewards motivate people and make it more likely that people will repeat a behaviour. Financial returns to reward citizens will be the most effective and successful strategies you can use as part of any proposed. Reward systems such as loyalty points which are in place in businesses across Ireland are extremely successful examples of how to

encourage people to repeat a behaviour. Applying these principles to waste reduction and management in Ireland is recommended. In addition, humans are actually very adept at adapting to change - in Ireland this was seen very clearly with the introduction of the smoking ban and the plastic bag levy, and the positive reception these received despite initial concerns. We are advocating that radical changes at times will be the most ethical change - for example pushing towards bans of single use plastics, in particular ban on plastic water bottles (as was successful in San Francisco), and leading the way on reduction of plastic at source.

In order to maximise change at both an individual and a collective level, it is crucial that there is a coherent and joined up national strategy for waste management that facilitates optimum conditions for transformation. Individuals need to be supported to make changes through information giving alongside concrete pathways to reduce waste. For example, urging consumers to recycle household waste without the provision of clear labelling of what is recyclable in the context of a privatised and unaccountable waste management industry can contribute to feelings of helplessness and demotivation to recycle at all. Equally, condemning the use of single use plastic (SUP) water bottles when several parts of the country do not have access to clean drinking water and therefore no alternative to SUPS, creates a culture of learned helplessness and can promote self rather than community focused behaviours.

Yerkes and Dodson's (1908) theory of improved performance based on a certain amount of arousal (stress curve) may be salient here. For instance some information about climate change and waste management in combination with national structures to implement change (sufficient arousal) will promote optimum conditions to take action (performance). Continued information without avenues to take action (too much arousal) will lead to inaction (poor performance or burnout). See graph below for further explanation of this phenomenon.

In line with the theories above, we advocate for a shift from individual responsibility on tackling climate change and waste management to placing responsibility on the government, to make changes accessible, desirable and rewarding.



Section 3 - Municipal Waste

3.6. Other Policy Options and Measures

A quality waste management assurance award scheme will be developed for businesses (including apartments serviced by management companies) to sign up to. This will verify that premises are complying with best waste management practice in terms of waste prevention and recycling (including organic waste).

- Is the quality waste management assurance scheme voluntary? What is the evidence for the efficacy of a voluntary scheme in the prevention of waste and promotion of recycling? Would this promote appropriate waste management beyond participants in the scheme? If this were to be designed as behaviour modelling intervention, it may indeed improve motivation to recycle and manage waste appropriately. However, full opportunity to engage in waste management must be in place in terms of the recycling facilities available and outlets to contribute to meaningful reuse. Waste reduction options and/or related incentives must also be in place.

The existing national standardised list of items acceptable in the mixed dry recycling bin will be revisited with a view to expanding the list to capture more recyclables.

- The global environmental impact of waste management must be considered, in line with principles of climate justice. A timeline and schedule to penalise offshore waste management (in the medium term at least) should be developed. Offshore management should be factored into any assessment of the environmental and social impact of waste. This environmental and social impact should be factored into waste management charges which should be considered for levying on producers, importers, and retailers, in particular those of single-use, disposable, and limited-life consumer goods, and highly-polluting industrial materials where viable alternatives exist.

3.7 Consultation questions – Municipal Waste

- The city of Lahti in Finland is a model exemplar for waste management. 92% of Lahti's municipal solid waste is recovered by Kujala Waste Treatment Centre (see <https://www.smartlahti.fi/content/kujala-waste-symbiosis/>).
- In Ireland a survey of 17,500 people found that 75% of people actively support a plastic bottle returns scheme. A returns scheme would create the social change required to develop and expand our recycling behaviours. It might have the potential to act as an anti-litter initiative.

3.8. Consultation Questions – Household Waste

- How will these proposals be enforced when waste collection has been privatised?
- Is there an assurance that customer separated organic and general waste will not ultimately go to the same end waste point?
- Who will monitor this? E.g. is there a government body enforcing the actions of the private waste collectors?
- Legislate/regulate to ensure full provision of adequate waste collection facilities for the populations of apartment buildings, apartment complexes, and other rental properties.

- Blocks of apartments or flats, and rows of terraced houses, with at least 10 dwellings should require household waste bins for: biowaste, mixed waste, paper, carton, glass and metal. This has been implemented in Lahti, Finland.
- Encourage landlords and/or property management companies to make tenants aware of all available waste collection facilities and normal practice. Provision of such information should be made compulsory.
- We rely on private recycling companies outside of Ireland to purchase our recycling – therefore we are trying to meet standards set by them on what plastic is accepted, and what state it is in, which significantly reduces the actual amount that is ultimately accepted rather than sent to landfill. Ultimately we are asking the public to create a product to be sold – clean appropriate plastics. We are asking them to put time and effort into creating this product, with a growing threat of punishment if it is not done correctly. Incentives and rewards for the desired positive behaviour should be prioritised, as well as greater state responsibility for bridging the gap between the needs of the people and the needs of these private companies. Currently some waste collection companies (i.e. City Bin) provide customers with feedback on how well they manage their waste (e.g. what percentage of waste in the recycling bin was actual recyclable material). This is already positive reinforcement of behaviour, but providing households with a discount on bin charges depending on their waste management behaviours could incentivise this behaviour further.
- Doubt and uncertainty will create barriers for the individual - is it recyclable? Will this ultimately be recycled even if I put the effort in? If no direct feedback is provided on whether recycling is accepted or rejected as contaminated, there is no ability to learn and improve behaviour. More transparent information on where this recycling ends up is also necessary to reinforce behaviour - people are vaguely aware China is no longer taking our plastics, so why bother? Where does it go?
- The Repak 'green dot' label is misleading and confusing – many interpret it as indicating that packaging is recyclable. Clear labelling on whether packaging is recyclable should be mandatory and consistent. Customers can then make informed choices when buying products, and also removes the barrier of uncertainty when it comes to disposing of it correctly. Consumer preference for recyclable packaging may then encourage businesses to adopt this, if the state is disinclined to enforce standards on them directly.
- That 66% of plastic waste from curbside bins is not widely recyclable highlights the need to attend to industrial and import level change.

Civic Amenity Sites

- A standard, maximal service should be available across all Civic Amenity Sites. A national awareness scheme should be rolled out to support service engagement. .
- The ability to engage in meaningful exchange and upcycling should be considered for Civic Amenity Sites.
- Provision of funding by the General Exchequer should be considered, at least for a pilot programme. Subsequent devolution to Local Authorities should also be considered. Taxation of the producers of high-polluting consumer goods, at corporate and retail level, should be considered as a means of raising revenue.

3.9 Consultation Questions - Commercial Waste

- Pay-by-weight, or perhaps pay by volume, should be considered as the form of charging for commercial waste management.
- An alternative, or supplementary measure, would be to measure the environmental and social impact of particular grades of waste, and to implement a charging scheme aligned with this. This could be designed to ensure that the highest rates would be levied on commercial waste with the most detrimental environmental and so I'll impact and not *merely* on the highest volume.
- Research on behaviour change should be undertaken at both individual and commercial levels to investigate the barriers to and facilitators of change in the Irish context. For optimal outcomes, it is likely that interventions should focus on interventions that serve the following functions: education, persuasion, behavioural modelling, and crucially, providing the meaningful and comprehensive opportunities.

Section 4. Food Waste

Ireland generates approximately 1 million tonnes of food waste per year (not including wasted food from agriculture).

- Agreeing a voluntary target (as set out) with retailers and the processing industry for a percentage of edible food to be donated is simply not going to be enough. A body with a coordinating role needs to be funded and supported to achieve this.
- What is the total estimated food waste, which includes wasted food from agriculture? How will this agricultural waste be accommodated into the circular economy?
- All edible food should be donated to support a more circular economy. For example, France has introduced a law that bans food retailers from throwing out edible food. Instead they must donate food e.g to food banks or charities.
- What evidence is there to support statutory regulation on supermarket 'buy one, get one free' offers in reducing food waste? Is there a role for this?
- What percentage of homes in Ireland currently have an organic waste collection facility? This must be rolled out nationwide to allow individuals to dispose of organic waste in an appropriate way.
- Community food sharing may also be an effective way to reduce food waste. Apps such as Olio (<https://olioex.com/>) could be promoted and supported to be used across Ireland.

Section 5: Plastic and Packaging Waste

5.7. Consultation Questions

- A large reduction in the plastic that is allowed to enter our market place in Ireland. Make reform and oversight of plastic imports a priority. Remove the need for plastic at source.
- The system they have in Germany whereby plastic bottles are reused, and glass bottles are returned (rather than recycled) should be considered in Ireland. Particularly to incentivize the use of glass bottles that can be returned to the store, rather than dumped in the bottle bank.
- What about returning to using glass milk bottles that can be reused? Are there reasons milk is always in plastic containers, and can we work to change this?
- Provide grants for people who wish to set up zero waste/no packaging stores – to bring back the system of loose products

Section 6. Single Use Plastic (SUP)

- Dumped plastic fishing gear comprises almost half of the plastic waste in our oceans. Enforcing a polluter pays principle is a priority in reducing this waste. It is crucial that the fishing companies are held responsible for their waste, rather than the consumer, who has no option but to buy the products available to them. Financial payments may not be sufficient, as this cost will likely just be passed on to the consumer. Rather, a responsibility to engage in responsible fishing practices may function better to actually reduce plastic waste in the ocean.
- Ban bottled water in areas with clean drinking water. We have seen the success of banning things such as smoking and we have also seen how people adapt to this change quickly.
- Introduce more public drinking fountains and promote increased awareness and use of water refill stations, e.g. Refill Ireland have developed a free to use network of organizations that will refill water bottles quibble free. They also provide a searchable map of public water fountains. Can this be scalable on a national level? It could be made law that all establishments with clean drinking water must refill bottles for the public when asked.
- Provide grant assistance to support all major sporting events in Ireland, which typically use bottled water to swap to reusable plastics, e.g. the Dublin Marathon, The Cork Marathon etc. Or alternatively, make gaining local authority permission to host a major race, contingent on using reusable water sources.
- There needs to be a joined up response to improving the quality and safety of drinking water in Ireland. For instance, several areas in Ireland are on recurrent boil notices and some have been on consistent boil notices for several years. Investing and repairing the infrastructure of the water supply in Ireland will be a crucial factor in reducing single use bottled water.
- The culture needs to change around packaging- e.g. takeaway food packaging, single use coffee cups. If people were incentivised through mandatory discounts when bringing their own containers, this may result in an increase of people bringing their own containers. Alternative options could be providing grants/ short term loans to businesses to set up a deposit-and-return scheme on reusable take-away containers and/ or coffee cups.
- Encourage development of use of bioplastics

Section 7.7 – Consultation questions – Circular economy

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

- Reduction of plastic waste and funding research, which looks at sustainable alternatives to plastic packaging. Ireland's universities are full of bright minds.
- Behavioural psychologists have examined the ways in which to influence human behaviour. Reward. Decades of psychological research have helped us to learn that people are more likely to repeat a behaviour if it has positive results. It does not require an ideological agreement with

anything, but the reward (in this case money), can and will strongly encourage behavioural change in people living in Ireland.

- Scaffolding: in order to successfully change individual behaviour, it is crucial to provide the necessary 'scaffolding'. In the case of creating a circular economy, individuals must, for example, have access to drinking fountains, have a free organic waste collection service, have zero-waste shops within their locality etc. In addition, individuals must be given education around how and why to use such amenities. (Zones of proximal development, Vygotsky)
- Perhaps most crucially, Maslow's hierarchy of needs stipulates that all individuals first and foremost must have their needs met in terms of physiological needs (water, food, air) and safety (somewhere to live, health, resources) before they can work towards other goals in life. This tells us that when there is such inequality and adversity in society, individual change will likely be impossible. Thus, social problems such as homelessness and healthcare must be tackled alongside asking individuals to adapt their behaviour in the ways mentioned above. In addition, it should be the responsibility of the government, corporations and businesses to take the most drastic and immediate action for climate change.
- To further encourage pro-social behaviour public bodies should publicly display a waste charter slogan or logo. A national campaign to publicise a branded public-body waste charter would help to raise the profile of waste as a national issue.

Section 10 – Textiles – Waste and Recycling

- People need to be educated about polyester – that it is plastic and will never disintegrate. Furthermore when washed, fibres are released – which is part of the microplastic problem in the oceans. Cheap clothing is very often made of polyester and unfortunately this is all that individuals with lower incomes can afford. We do not advocate for a levy on such items, as for people on lower incomes, this may be the only way to afford clothes. The following two points may be alternative ways to combat this issue.
- Educate young people – who are often very keen to help the environment but also very keen to buy lots of cheap clothes. Promote swap-shops, second-hand clothes shops and clothes rental shops for young people. These must also remain affordable options (see next point).
- Provide grants for swap shops, second hand clothes shops and clothes rental shops. This will keep the cost of second hand clothes and clothes rental down, allowing those of any incomes to shop here.

Section 11 – Waste Management Infrastructure

Is there scope to consider the nationalization of waste services again. Waste collection for profit prioritise exactly that, as well as exploiting staff and seeking government subsidies in the event of losses. Waste collection ends up quite separate from disposal - the circle cannot join, which makes little sense. We suggest nationalising waste services in order to make the service truly work for the needs of Ireland and the planet. This may be the only way to take the emphasis away from profit and back towards the needs of communities.

Section 18. Research and Innovation

- Research into sustainable alternatives to plastic should be funded.
- EPA research programme is vague.

If you would like to discuss any aspect of this submission, please contact us by email at irelandpsc@gmail.com

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