

Email: Wastecomments@DCCAE.gov.ie

Our response takes your questions numbered as per the consultation and answers them. As each submission might use a different format DCCAE have given its staff a very tough job to collate and take on these responses, we hope its possible to do this given what will be diverse formats of reply.

1. 3.7 Consultation Questions – Municipal Waste

- More prevention and reuse and less recycling. Exporting what is inconvenient (waste) is not good practice. A lot of waste is related to food packaging so tax food imports, introduce a law making local products the default. Where we cannot grow food imports are allowed but taxed. Reducing packaging and food miles. Farmers and local producers will innovate, diversify, economies will build. They do this in France, can we?
- Support reuse and food growing enterprise, tax breaks and/or incentives. Incentivise imports that we can grow.
- Develop training for reuse enterprises and food growing enterprises, apprenticeship schemes would build these markets, established enterprises would take on apprentices, they become upskilled in the process, it's a win win.
- Develop appliance-reuse certification – they can do it in the UK, we can to.
- Enterprises in the social economy should be especially incentivised.

3.8 Consultation Questions – Household Waste

- The current aim is to reduce landfill and increase recycling, its working. We should not incentivise recycling as much, domestic recycling should cost more than it does. Waste performance comparison does work, best not to use metrics in the comparison, use a simple traffic light system or maybe smilies etc...
- Please do not allow more recycling at CAS, recycling is not the answer, incentivise social economy to reuse more....
- We should stop exporting our problems.
- Establish norm setting, communicate differently
- Rediscovery Centre is an expensive demonstration vehicle, you need smaller demos all around the country.

3.9 Consultation Questions – Commercial Waste

- Incentivise better segregation and recycling of commercial waste.
- Incentivise business to prevent or reuse, recycling is not the go-to answer.
- Certification scheme is good.
- More enterprise, more innovation, SMEs incentivised and championed as beacons of sustainability once they establish, others will follow
- Establish norm setting, communicate differently

4.7 Consultation Questions – Food Waste

- Underlying causes of food waste in Ireland are busy lifestyles, we need to show food adverts and education and awareness material using platters on the table – a great food saving device of old, food untouched after the meal can be reused.
- Wait for European targets, culturally targets are something to aim for and not to reach. Seek commitment or charters before you enshrine a target, plenty of zero waste projects need incentivising, they are beginning to happen and cost relatively little, incentivise and build community examples and laud these as champions – others will follow
- Ireland become an Irish ‘farm to fork’ global leader in food waste reduction, local is key as it has less packaging, provides jobs and people will back this...
- Need to back those who reduce food waste at the community scale.

5.7 Consultation Questions – Plastic and Packaging Waste

- We can make it easier for citizens to play a role in delivering on our targets by leading by example, simply recycling everything is not the answer
- Do waste collectors have a role to play – it's too late – end of pipe is too late.
- What is the role of retailers – to support the complete banning of single use plastic
- What is the role of manufacturers – to respond to laws which enable local food production (zero plastic) and prohibit import where local products exist.
- Are there targets other than EU that we should be striving towards – we don't strive to targets – seek commitments and charters at community scale, build exemplars and champion these.

6.6 Consultation Questions – Single Use Plastics

- Ban single use plastic
- Oblige retailers to give a reduction to consumers who use re-useable ware. Oblige supermarkets to provide waste bins for plastic so consumers can leave it.
- Data – measure the amount of waste collected from supermarkets, enforce, lead by example, they will prevent single use if you do.
- Levies help where no alternatives exist, you can now buy cheap bags at all shops, some are even free (coming in from the north). You need to enforce what you are doing, levy charges were not enforced properly. Levys work, but you have to work them.
- Challenges in tethering caps are easy, we landed astronauts on the moon in 1967, a strong hand is required with industry, the EPA is seen as being far too nice, it supports business more than it supports the environment. On example is its smoke free coal that it champions at its EPA Ireland event in Croke Park every year – coal retailers allowed to exhibit, while the SEAI are not incentivising oil and gas boilers anymore – who is doing best the EPA or SEAI, the public know the answer.
- What are manufacturers doing now to ensure all beverage bottles contain 30% recycled content – I would ask what are the EPA doing, this is their job, manufacturers are there to make money.
- Not sure this is the answer – what about bottle return schemes? 30% recycling has a significant energy cost.

- ● Would you use a segregated bin just for the responsible disposal of single use PET containers – what about banning it.
- ● What role can an Extended Producer Responsibility Scheme play in delivering on these targets – worth trying, producer pays.

● 7.7 Consultation Questions – Circular Economy

● On the circular economy we are too fond of recycling, when other things mentioned above are critical. Serious lack of skills in reuse and food growing though the latter is being addressed by others. Address labour gaps, social economy supports, apprenticeship needs, reuse market intelligence gaps etc. Exporting the problem is not circular economy, need to find a way of supporting reuse and to override the institutional fear of compensation risk associated with it.

8.7 Consultation Questions – Citizen Engagement

□ What campaigns would better assist householders and businesses in preventing and segregating waste properly – show comparative bills, support householders, lead by example and make retailers take single use plastic back. You show the appetite and the public will not let you down. Local waste SMEs incentivised can also lead by example and demo synergetic activities locally.

□ Should this be funded by Government or should the sector play a role in funding campaigns – the gov should fund diverse waste SMEs locally in communities instead of the expensive rediscovery centre. Transferability of the highly funded model (rediscovery centre) to the poorly funded offshoot will not work. Tax breaks etc for SMEs and social economy, do like the Belgians do.

□ 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? – Many only have 2 bins, why do you ask about 3 bins only? Some collectors like galway city bins are brilliant – others are poor.

□ Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households – why is this not done already, really difficult choices made by busy people, at work and at home people still make wrong decisions, why is this not clearer.....

15.7 Consultation Questions – Extended Producer Responsibility

- Producers should be paid to reuse as well – more than they are paid to recycle, incentivise reuse, start up the reuse economy through incentive/tax break, support social economy
- How do we influence decisions made at the product design stage to ensure circular

design principles are put in place – with strict laws and enforcement, EPA appear to be too cosy with the industry.

- Modulated fees: €25 to reuse an appliance: €4 to recycle it. And this needs policing, if SEAI can inspect their retrofit sites the EPA can police this.....
- We are europe's best at exporting the problem, can we be europe's best at sorting the problem?

Thank you for this opportunity, it's a long questionnaire and its not easy for you guys to get the information you require. I hope you do. Thank you.
Vincent Carragher