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Sent: 21 February 2020 11:11
To: wastecomments
Cc: Clifford, Eoghan; Spillane, Charles
Subject: Waste Action Plan Consultation Response from Ryan Institute, NUI Galway

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NUI Galway
OÉ Gaillimh



Ryan
Institute

Ryan Institute, National University of Ireland Galway Submission to Waste Action Plan Consultation (20 Feb 2020)

About the Ryan Institute at the National University of Ireland Galway: The Ryan Institute's sustainability research mission focuses on four thematic research areas, namely (1) Marine & Coastal, (2) Energy & Climate Change, (3) Agriculture & BioEconomy, and (4) Environment & Health. The Ryan Institute is comprised of 12 Research Centres/Clusters spanning these four thematic research areas. The Ryan Institute is NUI Galway's largest research institute comprised of 93 Research Groups and 12 Research Centres/Clusters that are responsible for over 350 funded research projects comprising circa. 20% of the overall research income of NUI Galway. The 93 Research Groups (each lead by a Ryan Institute Principal Investigator) within the Ryan Institute collectively consist of circa 470 full time researchers, including 100 Postdoctoral Fellows, 53 Research Assistants, and 250 PhD students. The Ryan Institute's 93 research groups generate over one quarter of all research publications and citations from NUI Galway. See: www.ryaninstitute.ie

The Ryan Institute welcomes the draft Waste Action Plan, and the opportunity to comment on how the Waste Action Plan could be improved. The following are the comments and recommendation of the Ryan Institute regarding the draft Waste Action Plan.

Section 2 Institutional Arrangements

- The regulatory framework for waste management in Ireland is somewhat fragmented, with roles for the Environmental Protection Agency and local authorities, and a range of authorisations possible, including a Waste or IPPC licence, a Waste Facility Permit, or a Waste Certificate of Registration. In addition, there is a National Waste Collection Permit Office, a National Trans-Frontier Shipment Office, three co-ordinating Waste Enforcement Regional Lead Authorities, and three regional waste management planning offices. This complex overlapping of roles and responsibilities leads to duplication and inconsistency of approaches. (For example, the lead authorities for enforcement and waste management are not always the same.) This

should be reviewed with the goal to develop a more joined up and coherent institutional framework with clearly differentiated roles and responsibilities for waste management.

- As noted in the consultation paper, in its 2018 report, *The Operation of the Household Waste Collection Market*, the Competition and Consumer Protection Commission recommended that an economic regulator for household waste collection should be established. We consider that this recommendation should be progressed without delay.

Section 9 Construction and Demolition Waste

- It is important to ensure that end of waste status and options for re-use of waste are aligned across the EU, with a particular emphasis on how Brexit might impact cross Irish-border waste flows. This will enable better opportunities for recycling “Irish” construction waste within Ireland.
- Related to above – it is also necessary to develop standards for recycled aggregate in Ireland for various products (regardless of origin of material as it may have achieved end of waste status Northern Ireland – for example). This would greatly incentivise contractors and waste contractors to segregate waste and also develop new products from waste materials.
- Ireland should implement standardised means for waste contractors/construction sector to demonstrate safe “end of waste” status for construction waste. This can drive the use of such waste in non-critical construction products (e.g. use of recycled aggregate in products such as barriers, kerbing etc that do not have a key structural role or in other sectors such as filter media)

General

- There should be an increased emphasis on waste prevention which involves stakeholders from government and the EPA in particular “driving/incentivising” various sectors to reduce waste associated with all retail products and food and drinks. Retailers need to enable options for consumers in terms of minimising packaging at source (e.g. during food purchase). In some cases, consumers could be better enabled to leave their packaging at the retail outlet which may drive retailers to engage with suppliers down the supply chain around packaging
- Overall, we should minimise the export of waste and support the development in industry in Ireland (and within the EU) that can enable self-sufficiency in terms of waste management.

The development of this Ryan Institute policy submission was led by Dr. Rónán Kennedy, Dr. Eoghan Clifford and Prof. Charles Spillane from the Ryan Institute at the National University of Ireland Galway.

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