

## Public Consultation Waste Action Plan for a Circular Economy 2019

The Public Consultation will close at 5pm on Friday 21<sup>st</sup> February 2020.

### Consultation Questions - 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?

### 3.7 Consultation Questions – Municipal Waste

- 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?
- 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?

### 3.8 Consultation Questions – 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?
- 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?
- 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? 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?
- 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?
- 3.9 Consultation Questions – 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?
- What further incentives could be put in place to encourage business to recycle more?

**Comment [KO1]:** Reward Smart design of products to promote re-use, deconstruction of post consumer waste where the individual components of a deconstructed product can be re-used, recycled.

Change legislation to allow waste be used as a resource. Create flexible waste policy that allows the valorisation of a waste to produce value without being restricted by legislation  
Promote prevention, minimisation, re-use over re-cycling.  
Promote large industry to innovate in the re-use of materials inside the factory gate (short loops and inner loops)

**Comment [KO2]:** Good behaviour must be rewarded. Public investment in schemes that pay the good behaviour practitioner will be important. Prevention is better than cure. Recycling costs energy and other resources. Prevention can preserve our stocks and prevent GHG emissions.

**Comment [KO3]:** Look to mainland Europe where recycling rates are higher and they have a far greater percentage of the population living in apartments. Germany, Holland Austria and Switzerland have very high rates of recycling and high rates of apartment living.

- 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?

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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?

### 4.7 Consultation Questions – Food Waste

- 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?

### 5.7 Consultation Questions – Plastic and Packaging Waste

- 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?
- What is the role of manufacturers?
- Is there a role for voluntary measures (individual or by sector) and if so, what might they be?
- Are there targets other than 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?
- 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?

### 6.6 Consultation Questions – Single Use Plastics

- 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?
- Are there measures already in place that could be strengthened by legislation – for example, obligating retailers to give a reduction to consumers who use re-useable ware?

**Comment [KO4]:** Over consumption. Portion sizes? Promotion of food waste

Restaurants and supermarkets need to be key target commercial partners in a food waste reduction strategy.

What impact are 2 for 1 offers and 3 for 2 offers having on customer behaviour? Why is the offer not 1 for half price or will this have the same effect of waste creation? Are consumers buying more than they need of perishable goods and then they go to waste in fridges/cupboards? Education at school level?

**Comment [KO5]:** Yes. Be a leader and learn ahead of the curve.

If food waste was a country then it would be the third biggest emitter of GHG after China and the USA. Ireland needs to be a leader here. There are huge opportunities for big data, IOT for food supply management and consumers - for knowledge based companies to help food suppliers (supermarkets) consumers on how t...

**Comment [KO6]:** Offer choice through a hierarchy where the “reduced” packaging is prioritised and /or smart packaging.

Inform the citizen so they can make the right choice.

**Comment [KO7]:** Retailer responsibility scheme for packaging. Packaging after life has a cost. Retailer supplying this packaging has to bear soe of the cost. This will change behaviour.

**Comment [KO8]:** See retailer responsibility. Same approach

**Comment [KO9]:** Re the ban on non re-usable cups – An all out ban may be counter productive. Compostable cups could be a solution (with an Environmental tax for waste management) as they are mostly contaminated with coffee/tea/soft drinks/milk/.

**Comment [KO10]:** Like plastic bag levy put a levy on non re-usable cup. Can we achieve 90% reduction like the plastic bag levy?

- Do retailers have role to play in exploring viable reusable food containers for on the go consumption?
- Are there additional products that are suitable for consumption reduction?
- 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 behavioural change?
- Are there other SUP items that cause litter and for which there are sustainable alternatives available, which Ireland should consider banning?
- 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?

### 7.7 Consultation Questions – Circular Economy

- 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?

### 8.7 Consultation Questions – Citizen Engagement

- 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?

**Comment [KO11]:** Absolutely?

**Comment [KO12]:** Foil capsules for coffee machines. Coffee grains can be composted but not with the foil. Bad product design? Compostable foil for coffee?

Plastic packaging on fruit and veg.

**Comment [KO13]:** Yes. See above comments

**Comment [KO14]:** Yes but look at the waste management infrastructure. Could it take compostables which could also reduce waste/litter?

**Comment [KO15]:** Price and quality of recyclate are barriers to recyclate resin use. Incentives to use recyclate are key

**Comment [KO16]:** Recycle the PET locally so that the resource is not exported into wider global markets (this will have an impact of GHG emissions per tonne of recyclate used, creates local jobs and promotes shorter recycling loops

**Comment [KO17]:** Recyclate price to quality ratio is a problem when competing with virgin material.

**Comment [KO18]:** Yes but supply chain needs to be analysed and fixed so that supply to go beyond 30% is possible. PET plastic bottles is an example where can go well beyond 30% (we may be well above that already in terms of collection (diversion from landfill) but not recycling.

**Comment [KO19]:** Probably unworkable at kerb side (3 (Green, Brown, Black) bins may be the limit)

**Comment [KO20]:** This could be more effective in reduction in use It can promote recycling e.g. Repak have done a great job in increasing collection/diversion rates but industry is likely to switch to an alternative (non plastic) than have to pay for recycling costs.

**Comment [KO21]:** Education and public engagement campaign. Industry/commercial/social leaders being supported to bring circular innovation into the mainstream, Challenge based competitions for ground up innovation Significant PPPs for circular economy innovation

- 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?

#### **9.7 Consultation Questions – Construction and Demolition Waste**

- 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?

#### **10.7 Consultation Questions – Textiles**

- 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?

#### **11.7 Consultation Questions – Waste Management Infrastructure**

- Should one national waste management plan be produced in place of the 3 current plans?
- Should the regional offices be set up on a statutory basis?
- Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded?
- 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?

#### **11.7 Consultation Questions – By-Products**

- 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?

#### **13.6 Consultation Questions – End of Waste**

- 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?
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#### **14.5 Consultation Questions – Exemptions**

- 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?

#### **15.7 Consultation Questions – Extended Producer Responsibility**

- 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?
- 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?

### 16.5 Consultation Questions - Waste Enforcement

- 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?

### 17.7 Consultation Questions - Waste Data

- 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?
- 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?

### 18.6 Consultation Questions - Research & Innovation

- 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?

#### Comment [KO22]:

Smart design  
 Extending the life of a product  
 . For ease of separation for re-use, recycling e.g. Smart packaging – smart design for a circular economy

Circular economy in manufacturing (short loops)  
 Design for Re-use and reduction of material use  
 Social and economic impact of circular economy  
 Big data, IOT and shared resources (car pooling, and sharing of other resources) - Shared resource models

Research for the development of local waste refineries and biorefineries  
 Plastics, food waste,, Ag, forestry, Marinevirgin and byproducts).  
 Biorefineries could deal with virgin and waste products from Ag, forestry, marine and fod waste (overlap wot haste refineries).

- What do you see as the main barriers/enablers to fostering a positive research culture around the circular economy?
- Do you think research on waste, resource efficiency and the circular economy could be better publicised and more readily accessible? How?
- 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?

**Comment [KO23]:** Funding both fundamental and applied research and social science. Supporting bottom up ideas.

**Comment [KO24]:** PPPs to support demonstrators

Get industry and academia to work together to address key societal and industry needs

### 19.7 Consultation Questions - Consumer Protection & Market Monitoring

- 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?

### 20.7 Consultation Questions - Green Public Procurement (GPP)

- 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?

**Comment [KO25]:** Lack of clear framework at national and EU level for GPP.

### 21.7 Consultation Questions - Household Bulky Waste

- What supports do consumers require to prevent bulky waste?
- Are consumers willing to pay more to ensure appropriate end-of-life disposal for these products?
- Should Government support investment in the recycling of large plastic items that are not suitable for domestic recycle collection?
- 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?

### 22.5 Consultation Questions - Bioeconomy

- 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?

**Comment [KO26]:** A fund to support “validation” of technologies to move them from early stage research (Tech readiness level (TRL) 3) to demonstration (TRL 6) and biorefinery scale (9).

Support Bioeconomy industry academic clusters to form a coherent vision for research and development.

Fund co-ordinated fundamental and orientated research in the bioeconomy

**Comment [KO27]:** No. An all of government approach that promotes greater cross sector activity has been identified at EU level as a major barrier to progress in the Bioeconomy. Ireland needs to create funds to promote co-operation and the creation of new business models. NTMA/EIB funds are needed for this. The current instruments in Ireland might work but DBEI and DCAAE, DAFM, SFI, EI, would be best placed to know if the instruments are there to create for example a PPP for the Bioeconomy.

**Comment [KO28]:** The EC set up a PPP (Biobased Industries Joint Undertaking (BBIJU) between Industry and EC. This has resulted in a significant ramping up of activity, creation of new value chains, bringing academic and industry closer together on fundamental and applied research/scale up and a structuring effect in this sector in Europe. It has also resulted in increased investment back into Europe when the trend was for companies to invest in Asia in the bioeconomy prior to the BBIJU. A PPP must include primary producers to

**Comment [KO29]:** Prevention and reduction in waste should be the key ambition for society. Avoidance of material use through smart design and behavioural changes are essential and should precede recycling. However society will generate waste and the vision should be to capture all waste and have a net zero waste society. This is ambitious nut should be the target.

Fundamental research linked to orientated research linked to scale u