

Stoneybatter Sustainability Coalition Submission on the Waste Action Plan for a Circular Economy

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The following is the submission from the Stoneybatter Sustainability Coalition on the Department of Communications, Climate Action and Environment consultation on a waste action plan.

Feedback

Municipal (Household and Commercial) Waste

The consultative document outlines target rates of MSW recycling of 55%, 60%, and 65% by 2025, 2030 and 2035 and limiting the amount of MSW to landfill to 10% by 2035. We strongly believe these targets are not ambitious enough and that long term targets should be revised upward to rates of 80%, 85%, and 90% by 2025, 2030 and 2035, with a further goal of reducing to zero the amount of waste sent to landfill by 2035.

Reducing at source

While individuals can affect change in this area, particularly with the aid of improved bin collection services (e.g split paper and plastics recycling), the emphasis should be placed on producers to reduce municipal waste.

National targets should be set on packaging reduction and an increasing tax levied on companies who do not provide 100% recyclable packaging and for each gram of packaging used in their product regardless of whether it can be recycled or not.

Hard restrictions should be placed on the amount of new, non-recycled, materials a product can contain. This would force producers to use recycled materials and create a demand on recycling that would allow the development of more efficient facilities. As the supply of recycled materials increases their cost will fall.

Our national waste strategy must be reconsidered to focus first on prevention and reduction, with reuse a strong second priority, increasing the facilities for repair and recycling only once the other possibilities have been exhausted.

A clear hierarchy should exist in terms of how we deal with waste:

1. Prevention (Design)
2. Reduction
3. Reuse
4. Repair
5. Recycle
6. Destroy

Recyclable must mean recyclable here

Far too much confusion exists amongst consumers about what can and cannot be recycled. A recyclable label should only appear on packaging if that packaging is 100% recyclable in this jurisdiction.

The repak logo, mywaste logo, or other logos which can confuse the public about the recyclability of packaging should be banned. Either packaging should be 100% recyclable in this jurisdiction, or not.

It should be compulsory that recycling instructions for a product appear on the packaging where packaging needs to be separated or cleaned to be recycled. For example, at present the paper part of a windowed envelope is recyclable so long as the plastic window is removed. The instructions on how to recycle the envelope should be on the envelope itself.

Ireland should first legislate for packaging produced in Ireland and work to have the same rules be introduced at a European level. So many of the goods we consume are imported; it is vital that Ireland becomes a leader in the reduction of waste.

We also need to increase education and awareness of the existing national standardised list of items acceptable in the mixed dry recycling bin and other bins.

Food waste as municipal waste

Much of the issue with food waste ending up in municipal waste is a result of poor food waste collection policies. It should be compulsory for every apartment block to provide brown bins, and there should be a regular collection of brown bins by a state owned bin service.

There must also be regulatory alignment with safe food practices. For example we need to push people to wash fruit and veg, rather than producers wrapping them in plastic.

We should investigate moving to sealable, uniform, rigid bins for both household and commercial waste. These bins would be on a similar scale to existing kitchen bins, but by being uniform would allow for automated disinfection outside the home. This would have several advantages in terms of restricting access to bins by seagulls and other animals, reducing plastic waste from bin-liners and improving civic hygiene and on-street odour.

Rigid bins could be brought by households to a central storage facility for a street or block of apartments. This automated facility could issue a fresh bin to people when they brought back a full bin. Bins could also be registered to reduce the amount of illegal dumping.

For areas, such as city centers, where space is restricted these storage facilities could be underground, as is the case in Belgium for example, and in areas where there is not even enough space for that, timed collection such as that organised in Taiwan, would be more appropriate.

State's role in municipal waste

It is vital that waste collection services be returned to public ownership before expansion. Significant investment is needed in waste-systems and it is vital that that money improve public assets rather than private margins.

We need to build robust Indigenous recycling infrastructure, moving away from exporting our waste to handling it ourselves. This in conjunction with a strengthened and enforced material reuse policy (discussed below) can have significant long term economic benefits.

When there are recyclables used in this state that cannot be recycled in this state it

is a sign that facilities need to be developed and investment needs to be made. For example currently recyclable coffee cups are available and indeed, are widely used, but these cannot be processed for recycling in this country.

The state should provide on street split bins in our towns and cities; with recycling, food waste and general waste being separated.

More glass recycling points in residential areas need to be installed. These can be sunk below ground as in other European countries to utilise space.

Food Waste

Food waste is an inevitable consequence of a system that places the profit motive above environmental concerns. Supermarkets bundle food to increase their margins and also put too much food on display in the knowledge that super-abundance leads to more sales.

Disincentivizing supermarket food waste

While the establishment of FoodCloud has gone some way to alleviating industrial food waste, there is still a national estimated one million tonnes of food waste per annum. (Bordbia, 2019) ¹

Ireland should introduce bans on supermarket food waste, similar to the laws enacted in France, supporting food donation across the public and private sectors. However, food charities can not become a repository for carbon emitting junk food with low nutrient but high calorific value and the state should seek to disincentivize over production of junk food beyond a ban on it's disposal.

A greater effort should be made to encourage zero-packaging shopping, where customers bring their own containers and fill them. This would reduce packaging on food (a convenience which disincentivizes use of general waste bins, if a product needs to be thrown out) and also decreases food waste from consumers over-purchasing due to bundled food items (the too many peppers problem). This could be incentivised with the carrot of a VAT decrease on unpackaged products, rather than the stick of an tax increase (above that for non-recyclables) on packaged products.

¹ <https://www.bordbia.ie/industry/insights/food-alert-frightening-facts-on-food-waste/>

Non-reusable (including recyclable) packaging should ultimately be banned for fresh food packaging. A deposit system for reusable packaging should be introduced, with returned packaging disinfected before being returned to use. Reusable packaging should be standardised, so that packaging can be returned to any shop regardless of the original source.

Systemic change to reduce household waste

Household food waste is a consequence of over purchasing, again partially because of bundled food, but also because of the distance of the consumer to shops. A move towards shopping every day, or nearly every day, over doing a big weekly shop would also reduce food waste. This could be incentivized with planning and taxation systems that encourages smaller, more diverse local shops; butchers, bakeries and grocers.

In Stoneybatter we are incredibly lucky to still have a high street butchers, green grocers and bakery; all of whom sell individually priced goods. It is possible to live in Stoneybatter and produce less food waste; simply because it is easy to shop in the village each day, or every other day.

This condition should not be exceptional. Re-orientating our shopping patterns to smaller more frequent shops in local stores accessible on foot or by bicycle is essential to reduce our food waste, packaging and carbon foot print.

Our planning system needs to be reorientated to only allow development when there are amenities such as small local shops in place, or where the development provides those amenities.

It should also be a mandatory condition of planning permission for all residential buildings that organic waste collection is available to all residents. Regulations with clear reporting, punitive fines (that go to local councils) and enforcement mechanisms are necessary to ensure these are provided.

Increase citizens information

In Ireland 80% of domestic food waste could be avoided. Each household nationally is responsible for 117kg avoidable food waste. Of the remaining 20% there are some items such as chicken bones and peelings that could be transformed into edible

food such as stock, but this requires skills and time. Home economics should be made compulsory in Irish schools, this will empower citizens with requisite skills to reduce food waste.

There is a growing interest in food preparation in the adult population too. Free or heavily discounted and widely available courses on preparing dishes with food that would otherwise be wasted could also drive a reduction in personal food waste.

Make composting available everywhere

In the immediate term the option of composting must be made available to bag waste customers. In the Stoneybatter area many people who live in terraced houses or apartments do not have access to space to store a large organic waste bin, and yet the only waste collection agency operating in the area (Greyhound) does not provide an organic bag service, only offering general and recycling.

Use of food waste

Where it is certain that food waste is raw it should be compulsory that it is composted. This is for example critical in the food-processing business.

Where food waste is cooked, or it is unclear whether food waste is raw or cooked, it should be used as a basis for growing fungus, which can then be used as animal feed.²

Certainly we should prioritise composting and fungus growth ahead of inefficient anaerobic digestion.

Labeling of biodegradable material

Clear guidance on compostable corn starch 'plastics' is necessary as many end up contaminating recycling facilities leading to entire collections being resigned to landfill.

In fact this is such a large problem that biodegradable material that looks like plastic is probably a negative in terms of recycling.

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https://www.researchgate.net/publication/260445257_Fungal_hydrolysis_in_submerged_fermentation_for_food_waste_treatment_and_fermentation_feedstock_preparation

At the very least it should be clear on each piece of biodegradable plastic that it cannot be recycled or binned, and must be composted. Regulations should also be in place to ensure that if something is described as biodegradable that it can be broken down in a private compost heap, rather than an industrial facility.

Plastic and Packaging Waste

While our target reduction in packaging waste is moving up from 34% in 2007 to 55% by 2030 our national ambition must go above and beyond these regulatory requirements.

Ireland generates more plastic packaging per capita than the majority of other Member States largely due to a contraction in the grocery sector, and that most domestic shopping is done weekly in a large supermarket.

As outlined above we should encourage zero waste grocery shops and begin a systemic shift away from large centralized supermarkets and back to smaller decentralized specialized local stores.

Standardising packaging

As described above we should be designing a system that standardises PET containers and allows for recirculation of containers amongst producers, retailers and consumers. This system should allow for consumers to bring containers to zero-packaging shops (the optimal situation) but also allow for consumers to return containers to retailers, who would pass them to service companies for disinfection before returning them to producers for recirculation.

A very good example of a system currently in use is the Kegstar system for packaging beer.³

An over reliance on return to producer, rather than zero packaging at retailer will

³ https://www.kegstar.com/united_kingdom/

have a consequence on space required for transport and as a result reduce transport efficiency and increase the carbon footprint of products. Consequently, insofar as it is possible, the cycle should be restricted to retailer / consumer interactions.

In the ideal world a consumer will bring a container they have cleaned themselves to a shop, fill that container in the shop in a manner that does not entail a high risk of cross contamination, with the goods the shop has received in bulk.

The less ideal scenario is that the consumer returns a used container to a retailer in exchange for another full container, which the retailer then passes, via a disinfection step, to the producer. This case leads to higher transport inefficiencies as outlined above.

Glass and other reusable containers

A hard limit should be placed on the amount of bottles that are crushed, instead provide a nudge in the form of preferred VAT rate for bottles that can be returned, washed and reused: the craft beverage industry is fertile ground for piloting this kind of innovation, with a view to rolling out across industry.

Coca Cola Ireland are already doing a version of this in small bar bottles of minerals.

Recycling as a minimum

All packaging must be recyclable at a minimum, with an emphasis on elimination of extraneous packaging and a ban on all materials that can't be recycled.

Systemic change to reduce packaging

As with food waste, systemic changes to our planning system can lead to reduced packaging waste. As mentioned above, you can live in Stoneybatter doing almost all your shopping in local businesses. These businesses provide 100% paper packaging, zero-packaging products or allow customers to bring in their own containers.

This has a very significant effect on the amount of waste produced, and if every person living in an urban or suburban setting had access to similar facilities within walking or cycling range a large amount of packaging could be removed.

It is important not to understate the role of supermarkets in plastic and packaging waste. Large weekly shops encourage packaged produce to maintain freshness, whereas smaller shopping trips can be unpackaged as the food is consumed immediately.

As mentioned above, super markets make use of bundling to increase margins on cheap goods but this bundling is always achieved through additional unnecessary packaging.

Trade offs between maintaining freshness and reduction of waste need to be made. Systemic change allows us to have the best of both worlds.

Single Use Plastic

The plastic bag levy has been very successful in changing consumer behaviour, yet plastic bags are still used in many instances in supermarkets and shops for loose items (such as fruit, bread). Often these bags could be replaced with paper, or as outlined in detail above, with a reusable PET system.

There is the challenge of balancing food safety and spoilage with waste reduction, but often these are focused on when ultimately it is actually convenience which is the driver of behaviour. Regulation needs to be made to find a balance between safety, spoilage, convenience and cost that reduces waste and protects our natural heritage.

An effort should be made through a national advertising campaign to encourage alternatives to cling film to extend food life.

A significant investment in on street water fountains should also be made; reducing the consumption of bottled water.

The state should take an active role in encouraging and promoting the existing reusable cup networks.

Circular Economy

We believe it is vital to move to a truly circular economy over the course of the next decade. The Stoneybatter Sustainability Coalition was formed due to concerns in the community over climate breakdown and biodiversity loss and we believe it is essential, especially for the latter, that we move away from an extractive economy.

The resources of this planet are finite, as is it's capacity to absorb carbon dioxide and pollution unchanged. We need to shrink our ecological footprint to the smallest it can possibly be to preserve a future for ourselves, our children and all life on Earth.

We must move to a situation where close to 100% of our materials are reused or recycled. We must change the productive processes to modular, reusable upgradeable and repairable sub-assemblies - particularly in our technology, white goods and electronics.

We need to break the fast-fashion model and return to a more sustainable consumption pattern for clothing and textiles that emphasises repair and re-purposing over discarding clothes and cycling wardrobes.

Critically, we also need to end the destruction of buildings to replace them with new structures, and in the process wasting materials and requiring the creation of millions of tonnes of new concrete.

The shift to a circular economy must happen at a pace beyond incrementalism. Our public servants need to recognize and embrace that challenge and offer brave, radical solutions to a global problem.

Citizen Engagement

We believe that citizen engagement is driven by information. The more the public knows about their society the more likely they are to engage with the process of civil society.

The state should leverage the CSO, or a newly formed waste management body, to publish targets and information on where waste is produced, and compare it to other areas.

We would like to know how much waste is produced in stoneybatter, and how that compares to other areas in Dublin and beyond. We would like to know if efforts that are made locally actually have an effect on waste, and if so, how big an effect.

Waste reduction targets should be published in digestible form and they should get buy-in from the public. What is measured is managed and publishing waste reduction targets that involve schools, local groups and tidy town committees will help achieve this locally, regionally and nationally.

Some additional information should be made clear to consumers. Concretely, the amount of Greenhouse gas emissions used to produce, package, ship and dispose of a product should be clearly visible on it's packaging, or when we do eventually remove most packaging, on the labelling beside it in a shop.

As mentioned above, we need an independent body to check those numbers.

Beyond informing the public we also need to educate people and shift the culture away from a sense of disposability of materials and to a sense of custodianship of our material and natural world. We need to break our dependence on consumption as the driver of our economy and move towards having a truly sustainable impact on the planet.

Construction & Demolition Waste

Over the course of the next several decades we will need to move away from the destruction and re-construction of buildings to the minimal change repurposing of structures.

There are several reasons for this; primarily because of the enormous carbon footprint buildings have during their construction (particularly from the concrete used) but also because there is a serious global shortage of the sand used for making concrete.⁴

Instead we must become more innovative in our re-purposing of buildings, and once again, adjust planning regulations to enforce this.

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<https://www.businessinsider.com/global-sand-shortage-could-cause-damaging-effects-2018-12?r=US&IR=T>

Textiles –Waste and Recycling

We need to introduce targets for reducing textile waste. With an estimated 225,000 tonnes of textiles being discarded each year⁵ it is vital that this be addressed and minimized.

A blanket ban on synthetic non-bio-degradable materials in clothing needs to be introduced; removing micro-particles from our water systems and allowing all clothing sold in this company to be re-used at end of life, either as compost or mulch.

We believe a 10 year lead in is sufficient time for the market to adjust and we should have an outright ban of synthetic materials by 2030, with increased taxes on them every year until that date. As with some other measures outlined above, a carrot of a reduced VAT rate for sustainable textiles should be introduced in tandem.

Extended Producer Responsibility

We believe that the EPR is not a significant enough effort towards a circular economy from businesses and that the focus should instead be on product development that allows for complete or majority reuse of materials.

While the EPR is a step along the way, we need to rapidly move beyond it to a state where there are standardised reusable components, where all goods are easy to disassemble and repair outside the producers' remit and where returned end-of-life goods can be disassembled and reconstituted as new products.

Waste Enforcement

We strongly believe that one of the major ways to improve waste enforcement and reduce waste in general is to better fund local government.

Our system needs to give much more power and funding to local authorities and local representatives to deal with illegal dumping and provide alternatives that

⁵ <http://re-dress.ie/when-fashion-is-finished-garment-end-of-life-solutions/>

discourage it.

Local government should be given it's own powers of fundraising, through borrowing and taxation, and much more authority to set by-laws. We believe that this as much as any effort of central government will improve enforcement.

That said, we believe that fixed notice penalties for littering / illegal dumping should be introduced, and enforced where there is information found in dumped material that links back to an individual. The default for these offences should be a fine taken through the tax system with the possibility of a court appearance to appeal.

Corporate Enforcement

So much of our waste comes directly as a consequence of business decisions. We believe that punitive fines are required to strengthen enforcement (particularly in areas such as construction). These fines should be levied as a percentage of company profits, rather than a levy on projects, which can easily be based on as a cost of doing business.

Consumer Protection & Market Monitoring

As outlined elsewhere in this document, there is a large onus on the state to draft strong legislation for targets, monitoring of targets and enforcement of targets around waste.

We would strongly urge the government to consider the establishment of a state body for waste reduction which would create those targets and manage their enforcement.

We need to restrict the amount of packaging companies are allowed to place on products, the amount of material from non-recycled sources that are used in a product, and the amount of waste generated by producers, local business, areas and households.

We need a state body to monitor those limits and undertake enforcement.

Green Public Procurement

While it is a step in the right direction for state bodies to end the purchase of single-use plastic cups, cutlery and straws; this must be extended to all institutions who receive state funding and must apply to all procurement, not only direct purchasing.

This will require the redrafting of tender documents and for the procurement documents for every state and semi-state body to include provisions requiring zero waste. This will also require a cultural shift in these institutions.

As a concrete example Failte Ireland funding should not be provided for events that do not insist their traders adopt zero waste food delivery.

Bioeconomy

The term bioeconomy is vague, and even in the Waste Action Plan document seems to be poorly defined.

We believe that the economics of production must favour producers who contribute the most to the sustainability and restoration of our natural environment.

It should be clear to citizens and consumers which producers are playing their part, and which are not. In general we fall on the side of regulation and enforcement rather than market incentives or consumer information.

Informed consumers who have no option to change do not alter the unsustainability of our economic system. The emphasis must be on graduated penalties leading to eventual bans.

To improve biodiversity produce must come from farms where a portion of the available land is given over to wilderness and woodland. That should be certified per

farm by a state body, but must be backed up by consequences to farmers who do not shift over the next decade.

In terms of material goods; all the resources used in a product, but especially those from natural sources, need to be sustainably sourced. Once again the burden of measuring that must be the work of a state body, and there must be legal targets, penalties and enforcement.

This year the acting executive secretary of the UN Convention on Biological Diversity, Elizabeth Maruma Mrema, said "The risks will be major. One is that we will not have listened to the science and the evidence provided. Because we will not have listened, it means the global community will have said: let biodiversity loss continue, let people continue to die, let the degradation continue, deforestation continue, pollution continue, and we'll have given up as an international community to save the planet."

Conclusion: Move towards action

In conclusion we would strongly urge the Department of Communications, Climate Action and Environment; and the state and government as a whole; to move past the phase of consultation and into a new realm of action.

There is an urgency required in how we manage waste that is emphasized in the nearly daily news stories of biodiversity loss and environmental breakdown of our planet. We need our public servants to be ambitious and radical in their approach to dealing with waste and restructuring our society and economy as a whole.

The days when we could silo parts of our system away and deal with them as separate problems are over. We urgently need all branches of the state to work in tandem and shift our economy and society towards a more sustainable future.

The changes we face are radical and pressing, and we need a new bravery from citizens, public servants and public representatives to meet them.

