



Waste Policy & Resource Efficiency Division
Department of Communications,
Climate Action & Environment
Newtown Road,
Wexford,
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17/02/2020

Galway City Council – Waste Action Plan Submission

A Chara,

Galway City Council wish to re-enforce the following matters of concern as part of the consultation process in respect of the Waste Action Plan:

- Green Procurement as part of an award criteria for contract could be established with an initial target of 30% of local authority published tenders. The OGP and the LGOPC would nationally implement Green procurement within their frameworks and mini competitions.
- Implementation of an incentivised pay by weight charging scheme for waste collection.
- Potential for incentives for recycling processor start-ups within Ireland in order to reduce the climate impacts associated with travel of waste.
- Reduce the quantity of single use plastic placed on the market such as banning non-re-usable single use plastic(SUP) beverage containers and introduce a levy on items such as take away container and plastic bottles.
- Targeted Nationally driven awareness campaigns to be implemented.
- Consideration to be given to Construction & Demolition Waste currently being generated and identify any reusable items.

Please also see attached a spreadsheet which highlights further comments in respect of Galway City Council submission.

Mise le meas,

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On behalf of Galway City Council
Environment & Climate Change Department
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Section No.	Section	Page	Subsection	Consultation Questions	LA Comment	Rationale / supporting data
2	Institutional Arrangements	3	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?	Potential for incentives for recycling processor start ups in Ireland. Enhance awareness campaigns through WERLA/EPA	

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3	Municipal (Household and Commercial) Waste	16	3.7 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?	Increased inspections by the operators	
				What other new measures or practices could be put in place?	Introduce PTU (pay to use) facilities for small waste generators e.g. single person living alone	
				What do you see as the barriers/enablers to these measures?	Costs	
				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	3.8 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?	Full Pay by Weights schemes not being implemented by Waste Collectors	
				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?	Only recyclables that are too large for Domestic Bins. Upcycling and Exchange Schemes are positive ideas. Anti Dumping initiative funding and other department grants for event days	
				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?	Western region waste to energy facility	
		17	3.9 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?		
				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)?	Yes, similar to the former Green Business Initiative which was funded by the EPA	
				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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4	Food Waste	20	4.7	What are the underlying causes of food waste in Ireland?	Food is relatively cheap to purchase. Lack of awareness regarding basic cookery skills, meal planning, portion sizes, 3 for 2 deals etc.	
				Should Ireland introduce a national prevention target in advance of a possible EU target?	Possibly yes, it would give a focus on where Ireland is currently at. Consider the establishment of a Task Force	
				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?	Increase awareness of the Foodcloud website. Add more locations/Distribution Hubs within each region. Promotion of food donations	

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5	Plastic and Packaging Waste	22	5.7	How can we make it easier for citizens to play a role in delivering on our targets?	Reduce packaging availability at retailer level.	
				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?	Distributor to reduce packaging	
				* Please see section 14 on Extended Producer Responsibility		

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	6 Single Use Plastic	26	6.6	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?	Yes, a ban of single use cups has great potential. Reusable cups are available to purchase everywhere and the majority of cafés will rinse the cup out before they fill it.	
				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?	Possible yes. Similar to concious cup campaign	
				Do retailers have role to play in exploring viable reusable food containers for on the go consumption?	Yes a levy or ban of single use containers/plastic has great potential by reducing unnecessary waste.	
				Are there additional products that are suitable for consumption reduction?	Enhanced promotion of cloth nappies, cloth tissues.	
				What data is necessary for measuring consumption reduction of these specific products and any new products suggested?	Figures on number of units sold annually.	
				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?	Yes, a hefty levy should encourage persons to move to reuse, combined with significant initiative to assist in purchasing re-usable cups needs to be investigated.	
				Are there other SUP items that cause litter and for which there are sustainable alternatives available, which Ireland should consider banning?	Plastic drinks bottles, take away containers/wrapping, coffee cups	
				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 need a dedicated recycling stream for plastic bottles to obtain high quality ?	
				Would you use a segregated bin just for the responsible disposal of single use PET containers?	Yes	
				What role can an Extended Producer Responsibility Scheme play in delivering on these targets?	Increased tariffs	
				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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7	Circular Economy	31	7.7	What are the areas with greatest potential for transformation in Ireland under the Circular Economy?	Potential of further recycling processor facilities within Ireland. Green Design in facilities/buildings in regard to consumables and construction materials used.	
				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?		

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	Citizen Engagement - 8 Awareness & Education	34	8.7	What campaigns would better assist householders and businesses in preventing and segregating waste properly?	Pilot campaign to identify potential savings which could be made by reducing waste and proper segregation. Further awareness campaign on segregation and reduction of waste. Pricing incentives	
				Should this be funded by Government or should the sector play a role in funding campaigns?	Funded by Government, one national campaign to be rolled-out locally.	
				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?	Funded by Government, one national campaign to be rolled-out locally. Roll out of campaign that domestic bins have stickers/images on the bins of what can be disposed of within.	
				Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households?	Yes, definitely as per comment above	
				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?	Promotion of the circular economy in action, eg, the mattress recycling facility in Ballybane. Circular Economy is a term, but, does everyone understand what it actually means ?	

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	Construction & Demolition Waste	38	9.7	What other measures need to be put in place to encourage all players to prevent and recycle waste from construction?	Awareness campaigns for what material is actually re-usable/inert etc	
				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?	EPA need to give clear guidelines on Article 27 and make decisions within a defined period	
				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?	Consideration to be given to C & D Waste currently being generated and identify any reusable items. ECO design in construction and certification for materials	

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10	Textiles - Waste & Recycling	40	10.7	What measures would best support the successful collection of household textiles?	Amnesty Days	
				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?	Promote the Charity Shops for reusable materials. Rags to the recycling bins Should textile bins take more? Increase acceptance of various textiles for recycling	

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11	Waste Management Infrastructure	43	11.7	Should one national waste management plan be produced in place of the 3 current plans?	Possibly yes. Ireland is a relatively small country with limited options for processing the various waste streams. The targets identified would be for the whole country.	
				Should the regional offices be set up on a statutory basis?	Yes, the regional offices have a huge responsibility for the co-ordination the targets of the plan	
				Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded?	IDA - Enterprise Initiative	
				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?	Feasibility of a Waste to Energy facility in the West of Ireland to be investigated to reduce the cost of disposal and the proximity rule	

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12	By-Products	46	12.7	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?		

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13	End of Waste	48	13.6	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?		
				<p>If yes:</p> <ul style="list-style-type: none"> - 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? 	<p>Yes</p> <ul style="list-style-type: none"> - should include C & D Waste/Road Planings - Industry Stakeholders 	
				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	Exemptions	50	14.5	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?	No - Regulation is still required	
				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?		

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15	Extended Producer Responsibility	53	15.7	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?	Yes - something which should be considered	
				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?	PRI scheme be introduced for paints	

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16	Waste Enforcement	56	16.5	<p>What, in your view, are the factors leading to waste crime (please tick one box):</p> <p>Ineffective enforcement by the authorities Ineffective penalties Waste Market Factors Lack of awareness Other (please specify)</p>	Other - financial gain by illegal operators	
				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?	Combined efforts by all statutory bodies. Multi-Agency approach to inspections	
				Are the penalties available under the Waste Management Act appropriate?	Fixed Penalty Notices under the new Segregation, Storage and Presentation of Household and Commercial Waste Bye-laws, will have a positive effect.	
				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?	Increased monitoring of waste by Operators	
				Should financial provision be a requirement for permitted waste facilities?	Yes	
				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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17	Waste Data & Waste Flows	59	17.7	Do you believe it would be beneficial to have all/most waste data available on at least a quarterly basis?	No. More emphasis on what is happening on the ground	
				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?	Yes	
				Are there confidentiality or other issues for industry in reporting on waste flows?	Yes	
				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?	Provisions already in place in the Waste Collection Permits	
				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?	Data on the kilometres driven associated with waste transfer-operator gps tracking software	

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18	Research & Innovation	61	18.6	What are the research areas you would consider to be important in developing a circular economy?	What is the true life cycle of a product. Emissions Produced	
				What new research programmes/initiatives do you think could be put in place?		
				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?		

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	Consumer Protection & Market Monitoring	64	19.7	<p>The CCPC recommended the establishment of an economic regulator for household waste collection</p> <p>1. 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.</p> <p>2. If a regulator was to be introduced what powers should the office have? Should they be confined to economic powers?</p> <p>3. Should a new office be set up or should the powers of existing regulator be broadened?</p> <p>4. What alternatives are there to setting up a regulator, for example, improved regulatory oversight for customer's complaints?</p>	Already in place	
				Do you believe the information currently available on kerbside waste collection pricing could be improved, and if yes, how?	Yes	
				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?	Yes	
				Would you support the Group undertaking whole of market monitoring including publishing prices for household waste collection for all collectors in all areas?	Yes	
				Do you believe there needs to be further oversight of the waste sector from a consumer rights perspective?	Yes	
				Do you believe that a consumer complaints body should be out in place?	Yes	
				If yes, what powers would such a body have?	Access to all relevant records to fully deal with complaints	
				Should it be included within an existing body e.g. CCPC or the National Waste Collection Permit Office?	No. Independent	
				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?		

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20	Green Public Procurement (GPP)	67	20.7	What are the barriers to public authorities using GPP?	Lack of awareness of what is required	
				How can business support more widespread use of GPP?	Consider ISO accreditation	
				What % target should apply to the use of GPP in Ireland?	Full 100%	
				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?		

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21	Household Bulky Waste	69	21.7	What supports do consumers require to prevent bulky waste?	More reuse options such as charity shops, upcycling	
				Are consumers willing to pay more to ensure appropriate end-of-life disposal for these products?	Sometimes. Illegal dumping is still common practice. Increase awareness	
				Should Government support investment in the recycling of large plastic items that are not suitable for domestic recycle collection?	Already in place e.g. Civic Amenity Sites	
				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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22	Bioeconomy	72	22.5	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?		