

**Response by ACE Ireland to the Department of
Communications, Climate Action and Environment Public
Consultation on a Waste Action Plan for a Circular Economy.**

*Submitted by email to wastecomments@dccae.gov.ie
Friday, 28 February 2020*

The Alliance for Beverage Cartons and the Environment (ACE Ireland)

Address: c/o Instinctif Partners, 13 Merrion Square North, Dublin D02 HW89

Email: richard.hands@ace-ireland.com

Tel: +353 (0)1 513 4718

ACE Ireland represents Tetra Pak, Elopak and SIG Combibloc, the leading manufacturers of beverage cartons for the Irish market, and it delivers sector-wide environmental initiatives on behalf of its members.

2.1 Consultation Questions - Institutional Arrangements

- How are the current institutional waste prevention and management arrangements working and how could they be improved in your opinion?

Institutional arrangements are working well with respect to meeting packaging recycling targets overall, but there is room for improvement in ensuring the segregation and recycling of commercial waste. Resources should be made available to develop a more effective approach for commercial waste, including identifying core materials for collection (which should be consistent with materials collected at kerbside where relevant), stakeholder communication and enforcement.

- 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?

All producers of waste should play their part towards achieving more and better recycling to help reduce impacts and ensure a recycling culture is created in the nation as a whole.

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?

We strongly agree with the principle of increasing the cost of disposal to landfill in order to incentivise prevention and increase collection for recycling. All recyclable packaging should be recycled and landfill disposal should only be considered for materials for which no alternative exists. It is important to ensure that landfill is not a cheaper option than recycling for materials that should be continuing to circulate within the economy, thereby improving the management of resources and reducing the impacts on climate.

- What measures or practices are currently in place that could be improved?

There is a possibility that the measures or practices being implemented under the structure of the regional waste plans are resulting in a lack of national continuity,

promoting confusion between regions. It is also likely that the regional entities don't have the sufficient resources or power to implement many of these measures or practices for which they are responsible.

- What other new measures or practices could be put in place?

An emphasis on quality of recyclate is needed, to ensure that market demand for the material collected is not adversely impacted and to minimise rejected volumes. Better awareness and better separation of waste and recyclables at source are key. Consistency of materials collected, consistency of labelling and messaging and behaviour change campaigns would all positively contribute. Additionally, better sorting of mixed recyclables at MRFs would help to realise the value of materials collected and ensure that each is reprocessed optimally. For example, paper-based beverage cartons should be sorted from mixed paper and card, so that they can be reprocessed in a dedicated facility which recycles all components properly. This in turn also reduces the proportion of non-target material being received by board mills which may not be equipped to properly reprocess significant volumes of laminated paper.

- What do you see as the barriers/enablers to these measures?

One barrier is the time it takes households and businesses to develop an understanding of recycling processes and to implement the relevant processes required for sorting waste. While great strides have been made in Ireland to encourage engagement with recycling, further work is required on building knowledge and understanding of the importance of waste separation; mechanisms for implementation that are timely and process driven; and the effects of cross contamination.

- 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?

It is essential that well-designed and well-resourced collection and recycling systems are put in place (including for on-the-go consumption), that consumer awareness is increased and that anti-littering measures are effectively enforced. Collection and recycling should be funded by producers through an Extended Producer Responsibility system.

Beverage cartons, for example, are fully recyclable and large-scale dedicated recycling capacity exists throughout Europe. A plant in Halifax, UK, which is able to provide a recycling solution for material sourced in Ireland, recycles the fibre component into specialist grades of paperboard which utilise the high strength and quality of beverage carton fibre, and the polymer and aluminium components will be recycled in a new dedicated facility opening in Q2 2020. This will produce polymer granules for a range of injection-moulded products, such as for the automotive and electrical industries, and aluminium granules for manufacturing new aluminium products.

It is also clear that delivering more and better recycling requires a greater focus on quality. This should be achieved by separate collection. Poor quality recyclate results in more material being wasted, lower values and materials being sent abroad to markets with lower regulatory standards. All producers of waste should play their part towards achieving more and better recycling to help reduce impacts and ensure a recycling culture is created in the nation as a whole.

With regard to measurement, we would support the development of a carbon intensity metric, as impacts across the whole life-cycles of packaging or other items should be considered. This would mean taking account of sourcing of raw materials, manufacturing and use phases as well as end-of-life, not just the carbon savings achieved in recycling versus disposal. Not taking a whole life-cycle view could lead to unintended consequences and a higher environmental impact overall.

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?

Incentivised charging has led to significant improvements in Ireland, but by itself it does not provide the full solution. The unintended consequence of charging for waste collections is that householders are not incentivised to ensure general waste is kept out of recycling bins. This should be addressed with effective enforcement, but also with roll-out of the national standardised list of items for kerbside collections and consistent messaging and information.

It is essential that householders and members of the public understand the which materials can be recycled, and their collection schedule. They also need clear labelling on packaging to understand which category each package is in (recyclable/not recyclable), and therefore which bin to place it. This will extend to consumption on-the-go and in other out-of-home locations.

- 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?

Yes. We believe that the detailed, household-level information available in Ireland on waste and recycling performance is extremely valuable. Smart use of this data, not only for charging purposes but also to compare performance to others in the local area and more widely, could be a very powerful tool for behaviour-change. We also believe that mandatory information for householders on the end destinations of recyclates should be produced, so that they can better understand what happens to the materials they place in the recycling collections.

- 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?

If consistent, comprehensive kerbside collection services exist for most recyclables, it should only be necessary to offer collections at CA sites for recyclable or reusable items that are not collected at kerbside, such as textiles, wood and bulky items.

- What can be done to improve recycling (including organic waste) in apartment complexes?

There may be useful information that can be applied to Ireland in guidance produced in the UK by WRAP <http://www.wrap.org.uk/content/recycling-collections-flats> and LWARB <https://www.lwarb.gov.uk/wp-content/uploads/2016/09/Flats-Programme-Report-final.pdf>

- 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?

There is a need to create a better recycling culture in Ireland, where consumers' default course of action is to recycle rather than dispose of, and to recycle well. There should be information presented on what the consequences will be in terms of rejected loads and increased waste if recycling is not improved and systems not used correctly.

The beverage carton industry would be keen to continue to be part of the solution in this regard, working with others in the value chain, providing information that can be used with consumers on the value of beverage carton recycling.

Standardised bins are desirable, but this could be costly and result in considerable levels of waste if they were to be changed in a relatively short period of time. It is more important for systems to cover the same set of materials and to use the same labels, and for recycling instructions on packaging to be standardised.

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?

Yes, but there would need to be measures in place which ensure the system is not abused, and that non-recyclable material is kept out of the recycling bins to avoid contamination. For 'household-like' material from commercial premises it would be helpful to introduce a consistent core set of recyclable materials for collection, which would align with the set of materials collected at kerbside from households.

- What further incentives could be put in place to encourage business to recycle more?

It is reasonable to expect businesses to segregate waste for recycling in all circumstances, including food waste, as part of normal operations. All producers of waste should play their part towards achieving more and better recycling to help reduce impacts and ensure a recycling culture is created in the nation as a whole. A

'good recycler' certification scheme could be explored to recognise best practice. However, commercial waste collection should not be paid for out of EPR.

- 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)?

This would be a positive development.

- 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?

In order to achieve this, all stages of the waste process need to be considered including consumption and design, so that avoidance of waste can be supported through design which allows all packaging to be recycled.

4.7 Consultation Questions – Food Waste

- What are the underlying causes of food waste in Ireland?

There is a lack of food waste prevention programmes / training in Ireland, particularly in the commercial / retail sectors which generate significant volumes of food waste. More focus should be placed on tackling food waste, as well as funding and technical support to help Irish businesses proactively address the issue. There also needs to be a mechanism through which food waste is monitored nationally and through which progress against reduction targets can be measured.

- Should Ireland introduce a national prevention target in advance of a possible EU target?

A national prevention target would be a positive step, to focus consumer and value chain attention on the damaging impacts of food waste and the need for action.

- How can Ireland become a 'farm to fork' global leader in food waste reduction?

It should be a priority to remove all barriers to providing separate foodwaste collections. Carbon impacts from foodwaste are significant, and – as with packaging – the starting point should be that all is collected. The quality of dry recyclables should also improve with reduced contamination by foodwaste.

Like all food and drink packaging, beverage cartons play an essential role in reducing food waste – a major contributor of greenhouse gases – and preserving flavour, nutritional content and freshness. Beverage cartons can also significantly extend the shelf life of fresh products through aseptic (or 'long-life') systems. These allow for fresh food and beverages to be stored at ambient temperatures, without the need for refrigeration or preservatives, further reducing waste, reducing energy consumption and enabling more people to access fresh, healthy foods.

It is imperative that used packaging is then collected and recycled, to prevent packaging waste and to ensure that its constituent materials can be used again in a well-functioning circular economy.

In addition, beverage cartons are lightweight and space-efficient so can be easily stored and transported. For example, up to four litres of product in cartons can be contained in the same space required for only around two litres in bottles. This allows for more product to be transported, using less fuel and reducing overall carbon emissions.

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?

It is essential that householders and members of the public understand the core set of materials for recycling, and their collection schedule. They also need clear labelling on packaging to understand which category each package is in (recyclable/not recyclable), and therefore which bin to place it. This will extend to consumption on-the-go and in other out-of-home locations.

There is a need to create a better recycling culture in Ireland, where consumers' default course of action is to recycle rather than dispose of, and to recycle well. There should be information presented on what the consequences will be in terms of rejected loads and increased waste if recycling is not improved and systems not used correctly.

The beverage carton industry would be keen to continue to be part of the solution in this regard, working with others in the value chain, providing information that can be used with consumers on the value of beverage carton recycling.

- Do waste collectors have a role to play?

The detailed, household-level information available in Ireland on waste and recycling performance is extremely valuable. Smart use of this data, not only for charging purposes but also to compare performance to others in the local area and more widely, could be a very powerful tool for behaviour-change. We also believe that mandatory information for householders on the end destinations of recyclates should be produced, so that they can better understand what happens to the materials they place in the recycling collections.

- What is the role of retailers?

The use of packaging and the benefits that it brings (food and drink protection, functionality and environmental impacts across the whole life cycles of the product and packaging) are not widely understood by consumers. Producers and retailers who interact with the public are well placed to provide meaningful information to consumers on the steps that they are taking to minimise the overall impact of the products and packaging they sell.

Government also has an important role to play, working with business, in helping consumers to understand the benefits of packaging, particularly in respect of preventing food waste.

- What is the role of manufacturers?

Manufacturers should be incentivised to be innovative and to think 'outside the box' with regard to their role in reducing plastic and packaging waste, and in finding greener alternatives. They could also be required to quantify their efforts, which in turn could be measured against a national target. Many manufacturers are already taking significant measures to improve their performance in this area, and this is a useful platform on which to build.

- Is there a role for voluntary measures (individual or by sector) and if so, what might they be?

We support measures to reduce plastic and packaging waste. However, our preference would be for the introduction of mandatory measures to ensure that effective and measurable change takes place.

- Are there targets other than EU that we should be striving towards?

We strongly support the introduction of a specific beverage carton target in order to drive collection. Beverage cartons are currently within the paper target, but we advocate removing them from paper because (a) paper exceeds its target without needing to capture any laminated fibre packaging, which is therefore not prioritised by paper reprocessors; and (b) beverage cartons should not be collected and reprocessed as part of a mixed fibre grade in any case. They should be collected with containers, sorted and routed to the correct reprocessing facility so that all component materials can be fully recycled and the value of each be realised. The beverage carton industry has developed large-scale UK reprocessing capacity which is ready and available for the increased volumes of sorted, used beverage cartons that a new EPR system could deliver. The non-fibre elements of the beverage carton, comprising LDPE film, HDPE caps and aluminium foil, are also fully recyclable.

A beverage carton target will encourage more sorting and separation of cartons and will guide decisions on infrastructure investment. Greater separation will also enable beverage carton recycling progress to be tracked more accurately and transparently.

- 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?

It would depend on the level of the fees. However, eco modulation is a well-understood and accepted approach to disincentivise difficult to recycle packaging.

- 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?

It is important to assess an item's impacts across its whole life cycle so that evidence-based decisions can be made. If not, there is a risk that measures introduced will lead to unintended consequences and worse environmental outcomes overall.

Between 75% and 85% of a beverage carton – depending on whether it is aseptic or chilled respectively – is paperboard made from sustainably-sourced wood fibre, a bio-based renewable material which absorbs atmospheric carbon as it grows. Life cycle analysis by the Heidelberg Institute for Energy and Environmental Research shows that beverage cartons are among the best environmental performers of all drinks packaging formats.

(Heidelberg Institute for Energy and Environmental Research, "Comparative Life Cycle Assessment of Tetra Pak® carton packages and alternative packaging systems for liquid food on the Nordic market":

https://www.ifeu.de/oekobilanzen/pdf/LCA_Nordic_final_report_incl_Critical_Review.pdf)

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?

We do not believe that recyclable packaging should be banned. For such packaging it is essential that well-designed and well-resourced collection and recycling systems are put in place (including for on-the-go consumption), that consumer awareness is increased and that anti-littering measures are effectively enforced. Collection and recycling should be funded by producers through an Extended Producer Responsibility system.

- 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?

No response

- Do retailers have role to play in exploring viable reusable food containers for on the go consumption?

No response

- Are there additional products that are suitable for consumption reduction?

No response

- What data is necessary for measuring consumption reduction of these specific products and any new products suggested?

No response

- 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 behavioral change?

No response

- Are there other SUP items that cause litter and for which there are sustainable alternatives available, which Ireland should consider banning?

No response

- What are the challenges faced by industry in ensuring caps are tethered on all beverage containers by 3 July 2024?

No response

- 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%?

No response

- Can our current co-mingled collection model be enhanced in order to deliver a collection rate of 90% for PET beverage containers?

No response

- Would you use a segregated bin just for the responsible disposal of single use PET containers?

No response

- What role can an Extended Producer Responsibility Scheme play in delivering on these targets?

No response

- 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?

No response

7.7 Consultation Questions – Circular Economy

- What are the areas with greatest potential for transformation in Ireland under the Circular Economy?

No response.

- What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors?

As referred to in the Public Consultation document, there is little understanding among Irish business CEOs of what 'Circular Economy' means. In the first instance it

is vital that clear messaging is developed around that, which clearly outlines what a Circular Economy is and how its achievement will be beneficial to both Irish businesses and the general public.

- What might be a meaningful national waste reduction target and how could it be achieved?

No response.

- 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?

It is vital that environmental impacts are measured across whole life-cycles, so that evidence-based decisions can be made which provide maximum benefit to the environment. This means taking account of the sourcing of raw materials, manufacturing and use phases as well as recycling. If not, there is a risk that measures introduced will lead to unintended consequences and worse environmental outcomes overall.

Beverage cartons, for example, contribute to a true low-carbon circular society by both using responsibly-managed, bio-based renewable materials and by recycling at end-of-life. Between 75% and 85% of a beverage carton – depending on whether it is aseptic or chilled respectively – is paperboard made from sustainably-sourced wood fibre, a bio-based renewable material which absorbs atmospheric carbon as it grows. Life cycle analysis by the Heidelberg Institute for Energy and Environmental Research shows that beverage cartons are among the best environmental performers of all drinks packaging formats. (*Heidelberg Institute for Energy and Environmental Research, “Comparative Life Cycle Assessment of Tetra Pak® carton packages and alternative packaging systems for liquid food on the Nordic market”*: https://www.ifeu.de/oekobilanzen/pdf/LCA_Nordic_final_report_incl_Critical_Review.pdf)

We urge the Government to look beyond the traditional waste hierarchy when shaping proposals for a circular economy and to take a whole life-cycle approach to managing resources and environmental impacts, including the use of low-carbon, bio-based materials, so that environmental benefits can be maximised.

8.7 Consultation Questions – Citizen Engagement

- What campaigns would better assist householders and businesses in preventing and segregating waste properly?

There is a need to create a better recycling culture in Ireland, where consumers' default course of action is to recycle rather than dispose of, and to recycle well. There should be information presented on what the consequences will be in terms of rejected loads and increased waste if recycling is not improved and systems not used correctly.

The beverage carton industry would be keen to continue to be part of the solution in this regard, working with others in the value chain, providing information that can be used with consumers on the value of beverage carton recycling.

- Should this be funded by Government or should the sector play a role in funding campaigns?

All producers should contribute proportionately to nationally approved and co-ordinated communications which support the delivery of national recycling targets, and explain changes to collections infrastructure etc. This could be expected to include the cost of running a mandatory national on-pack recycling labelling system.

- 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?

It is more than likely that the waste collectors are the main point of contact for the majority of the public with regard to communications on waste and recycling. Therefore, it is imperative that the collectors provide as much information as possible to their customers on waste separation and on how to recycle well. As there are a number of operators in Ireland it is difficult to establish a clear picture of what information one provides compared to another. We would suggest that this information is streamlined and coordinated at a national level.

- Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households?

This would be very helpful, and less wasteful as it could be implemented without the need to standardise the colours of bins across the nation.

- 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?

No response.

9.7 Consultation Questions – Construction and Demolition Waste

No response.

- 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

No response.

- 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?

-

No response

- Should the regional offices be set up on a statutory basis?

No response

- Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded?

Ireland is currently very reliant on overseas reprocessing to reach its recycling targets. Indigenous reprocessing capacity is desirable where economically viable but given the size of the Irish market and of volumes available it will not be possible to sustain reprocessing facilities for all materials. State assistance should therefore not be made available in ways which distort the market, for example by giving a competitive advantage to one packaging material over another. It is vital that a level playing field applies for all materials.

- 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?

We note that a deposit return system may be considered. If a DRS is introduced, the most valuable fractions of recyclable materials will be removed from the kerbside recycling stream and this will inevitably affect the economics of dealing with non-DRS materials. It is therefore vital that kerbside systems are not undermined. There are significant volumes of other packaging wastes that will continue to require kerbside collections.

12.7 Consultation Questions – By-Products

No response.

- 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

No response.

- 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?

14.5 Consultation Questions – Exemptions

No response.

- 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?

As it currently stands, the Waste Management Act (1996) established a legislative basis for Producer Responsibility Initiatives (PRIs) in Ireland. These PRIs allow product producers to develop schemes that fulfil the basic objectives of waste management legislation.

The PRI's are currently assigned to the Environmental Protection Agency (EPA) for enforcement. The essence is that the producer is responsible for the items at end of life, when they become waste. This responsibility has been given a legal basis in Ireland and is being enforced by the EPA. These include WEEE (waste electrical and electronic equipment) and RoHS (waste batteries and accumulators and restriction of hazardous substances).

The Expanded Producer Responsibility infrastructure goes a step further with a focus on single-use plastics, meaning those who produce plastic will be responsible for its eventual disposal. This will require significant additional resourcing for the EPA if it is to oversee and enforce these additional requirements, which includes administration of producer registration and establishment of reporting mechanisms.

- 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?

Ireland's existing producer responsibility initiatives need to be more robust in terms of clearly defining the producer roles and responsibilities, setting out measurable waste management targets, and establishing data collection and reporting systems in order to respond to the EU legislative changes for EPR models. There is also an onus to communicate with producers, retailers, consumers-citizens, local authorities, waste management operators, recyclers and social economy actors to inform them of upcoming changes. In particular, new sectors which fall under the EPR rules need to be communicated with.

- How do EPRs help Ireland achieve our targets?

The benefits of well-designed EPR systems in achieving high packaging recycling rates are well-understood. However, EPR payments should also be used to drive quality of material collected, not only quantity.

We recognise that discussions on the development of the waste action plan and EPR will continue throughout 2020 and beyond. It is imperative that this process fully involves the supply chain to ensure that assessments are realistic, to recognise the way in which the supply chain operates and to ensure that the scale of future activities and changes in modus operandi are fully understood.

- How do we influence decisions made at the product design stage to ensure circular design principles are put in place?

It is imperative that the performance and functionality of packaging in safely delivering food and drink to the consumer is not compromised. Similarly the elimination of so-called "unnecessary packaging" must clearly demonstrate that it does not compromise product protection or increase environmental impact.

We recognise that discussions on the development of the waste action plan and EPR will continue throughout 2020 and beyond. It is imperative that this process fully involves the supply chain to ensure that assessments are realistic, to recognise the way in which the supply chain operates and to ensure that the scale of future activities and changes in modus operandi are fully understood.

- How could modulated fees be best introduced to drive change and transform our approach to waste in line with modern, circular economy principles?

Modulation is the fairest way of recovering costs from producers in managing waste. It is, however, important that functionality requirements are not overlooked. An item of packaging, for example, needs to satisfy the purpose for which it has been supplied. A case in point is the aseptic beverage package, which not only delivers the product to the consumer in perfect condition, but does so in a way which, by virtue of its resource-efficient multi-material format, does not require energy-intensive refrigeration or the use of preservatives. Not taking such attributes into account would lead to unintended consequences and a higher environmental impact overall, including through increasing avoidable food waste.

The principle of fee modulation is correct, but impacts should be measured across the life-cycle of the package, not only in terms of its recyclability. This means taking account of sourcing of raw materials, manufacturing and use phases and end-of-life. We would support a commitment to investigate the value of carbon intensity metrics in addition to weight-based recycling rates.

An aim to reduce the use of virgin materials, without a detailed understanding of the consequences, might result in increased environmental impact over the life cycle of the package. In the case of fibre, for example, a package using recycled content would need to be heavier than one using only virgin material in order to match its strength and structural integrity, thus reducing transport efficiency and increasing carbon impacts. Additionally, responsibly managed virgin fibre is abundantly available near the specialist board production mills and to transport recycled fibre to the point of production would increase environmental impacts. It is not appropriate to uniformly apply the principle of increasing recycled content across all materials and formats.

Clear standards must be set to determine difficult-to-recycle materials. Beverage cartons, although multi-material, are not difficult to recycle – the technology to recycle them is developed and large-scale recycling capacity is in place across Europe.

It is therefore important that packaging modulation is overseen by a body that is broad-based and informed on the wider aspects of packaging and the environment.

When eco-modulation is being designed careful consideration should be made to any possible unintended consequences, for example encouraging use of materials with an overall higher environmental impact, as measured across their life cycle.

- 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?

No response.

- Is there a role for voluntary agreements with industry?

We would prefer a mandatory approach, to ensure that the performance required to reach ambitious targets is achieved.

- What mechanisms will bring the entire supply chain and waste management systems together to share solutions?

No response.

- 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. Retailers and HORECA should be required to sort beverage cartons at source.

- 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?

EPR payments should only be made to collectors that reach agreed performance levels on quantity and quality as laid down by the authorities. This will ensure that each takes steps to provide the highest level of service and takes appropriate action to ensure appropriate citizen participation in recycling. We recognise that agreed performance levels may differ according to the characteristics of each organisation and expect that this will be managed by the governance arrangements. Operators' approaches to optimising the capture of quality recyclates must be scrutinised, including any factors that could encourage unintended behaviours by householders (e.g. little or no enforcement activities on poor recycling behaviours).

There should also be additional indicators specifically for the packaging waste stream covering, for example, material quality and quantity for recycling. Under the EPR proposals, packaging producers will be required to fund 80% net cost for packaging recycling. It is therefore extremely important that there is transparency in terms of the efficiencies of collections and that there is no cross-subsidisation of funding from packaging waste stream to other material streams or other areas of waste collectors' businesses.

16.5 Consultation Questions - Waste Enforcement

No response

- 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?

Yes. More up to date data would allow retailers make for informed and accurate decisions on their waste disposal.

- What resources are needed to validate this data more quickly and what are the barriers?

Barriers we have identified could include misreporting and late reporting, as well as delays in data being made available by the state.

- How would you balance the need for validated reporting data for EU reporting against the desire for more up to date statistics?

In order to achieve more up to date statistics at a national level, unvalidated data should be circulated before it is approved by the EU. The validated data can then be recirculated once approved by EU. This would help bridge the significant time gap that currently exists between when the data is generated and when it is approved by EU for validation before circulation.

- 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?

There are likely to be issues of commercial confidentiality as producers will be reluctant to make details of their packaging specifications public and available to competitors.

- What changes need to be put in place to facilitate better reporting?

Reporting should be mandatory with a structured formula and methodology. The process of reporting needs to be simplified to ensure that it is accessible and easy to process.

- What uses can be made of having more detailed, accurate, timely data?

This would allow for more reactive and focused decision making in terms of identifying priority areas and issues that need to be tackled.

- What penalties should be in place for the non-provision of data?

Effective enforcement by the relevant authority i.e. the EPA will be important in order to generate accurate waste data.

- Should there be voluntarily reporting on particular waste streams and its treatment destination prior to legislative changes being put in place?

This would help the process of developing and refining the system before legislative changes are 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?

There should be additional indicators specifically for the packaging waste stream covering, for example, material quality and quantity for recycling. Under EPR proposals, packaging producers may be required to fund full net cost for packaging recycling. Therefore it is extremely important that there is transparency in terms of the efficiencies of collections and to ensure there is no cross-subsidisation of funding from packaging waste stream to other material streams.

We would support the development of a carbon intensity metric but impacts across the life-cycle of the package or other item should be considered. This would mean taking account of sourcing of raw materials, manufacturing and use phases as well as end-of-life, not just the carbon savings achieved in recycling versus disposal. Not taking a whole life-cycle view could lead to unintended consequences and a higher environmental impact overall.

18.6 Consultation Questions - Research & Innovation

- What are the research areas you would consider to be important in developing a circular economy?

It is important to understand that while a Circular Economy requires as much re-circulating of materials as possible, there will always be a need for some virgin raw material to be introduced into the system, to make up for process losses and to maintain material quality. The responsible sourcing and sustainability of virgin raw materials must therefore be taken into account in a Circular Economy. In particular, there should be a focus on understanding the benefits of using renewable, bio-based

materials, which can not only be replenished as they are used, but also absorb carbon from the atmosphere as they are produced.

It is also very important that used packaging is recycled into other products that make best use of its characteristics. Wood fibres in paper can be recycled about 6 times, by which point they are too short to be used again and they are removed from the system. This means that even in a 100% recycling system there is a 15% loss of material with every cycle and this must be topped up with virgin fibre. The question should therefore be more about how the material can be best used at each step of its life cycle. The most appropriate use of virgin fibre is in food-grade packaging such as beverage cartons. It then continues to provide value in the Circular Economy by being incorporated into other fibre-based products after collection and recycling.

- What new research programmes/initiatives do you think could be put in place?

No response.

- What do you see as the main barriers/enablers to fostering a positive research culture around the circular economy?

No response.

- Do you think research on waste, resource efficiency and the circular economy could be better publicised and more readily accessible? How?

No response.

- What further incentives could be put in place to encourage research?

No response.

- 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?

With an increasing focus on the quality of mixed recyclate grades, particularly with respect to paper and plastic, it will be important to find more effective ways of separating materials, either in MRFs or where the recyclate is produced. For example, both beverage carton and fibre recycling would benefit from the sorting of cartons from mixed fibre and OCC.

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.

Yes, this would help to protect consumers, particularly where collection monopolies exist, and help to ensure that there is consistency of service and consistency of collection of all recyclable materials.

- If a regulator was to be introduced what powers should the office have?

It should be given enforcement powers to address non-compliance, unfair pricing mechanisms and poor service.

- Should they be confined to economic powers?

No

- Should a new office be set up or should the powers of existing regulator be broadened?

No response

- What alternatives are there to setting up a regulator, for example, improved regulatory oversight for customer's complaints?

No response

- Do you believe the information currently available on kerbside waste collection pricing could be improved, and if yes, how?

No response.

- Do you believe that the information prepared by the Price Monitoring Group is useful? If No, what changes would you like to see?

Yes

- Given that the last time flat rates fees were identified was July 2018, do you believe the work of the Group should continue?

Yes, to assist with market pricing and forecasting, in addition to collecting data.

- 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 put in place?

This would be helpful in improving service, monitoring pricing, resolving disputes and improving communication between all stakeholders.

- If yes, what powers would such a body have?

No response.

- Should it be included within an existing body e.g. CCPC or the National Waste Collection Permit Office?

No response.

- Is further regulation from a consumer perspective of the sector needed?

No response.

- If yes, what measures do you see as necessary for further regulation or what legislation needs to be strengthened?

No response.

20.7 Consultation Questions - Green Public Procurement (GPP)

No response.

- 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?

21.7 Consultation Questions - Household Bulky Waste

No response.

- 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?

No response.

- 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?

No response.

- How best to develop a value chain approach to link bio-based actors, value chains and territories?

No response.

- 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?

Between 75% and 85% of a beverage carton – depending on whether it is aseptic or chilled respectively – is paperboard made from sustainably-sourced wood fibre, a bio-based renewable material which absorbs atmospheric carbon as it grows. The forests that provide the fibre are responsibly-managed to deliver other environmental benefits, including for biodiversity and habitats.

Beverage cartons are also fully recyclable and large-scale dedicated recycling capacity exists in the UK and throughout Europe. The UK plant recycles the fibre into specialist grades of paperboard which utilise the high strength and quality of beverage carton fibre, and the polymer and aluminium components will be recycled in a new dedicated facility opening in the New Year. This will produce polymer granules for a range of injection-moulded products, such as for the automotive and electrical industries, and aluminium granules for manufacturing new aluminium products.

We urge the Government to look beyond the traditional waste hierarchy when shaping proposals for packaging in a low-carbon circular economy and to take a whole life-cycle approach to managing resources and environmental impacts, including the use of low-carbon, bio-based raw materials, so that evidence-based decisions lead to maximum environmental benefit. Beverage cartons contribute to a true low-carbon circular society by both using bio-based, renewable materials and by recycling at end-of-life. Indeed, life cycle analysis by the Heidelberg Institute for Energy and Environmental Research shows that beverage cartons are among the best environmental performers of all drinks packaging formats.

We therefore ask the Government to:

- adopt a whole life-cycle approach when shaping proposals for packaging in a low-carbon economy, including taking account of the vital role of packaging in preventing food waste and the benefits of using packaging made from low-carbon, bio-based raw materials;
- ensure that systems are in place to collect and recycle all recyclable packaging, including for on-the-go consumption.

ENDS