

Waste Action Plan Consultation,  
Waste Policy and Resource Efficiency,  
Department Communications, Climate Action & Environment,  
Newtown Road,  
Carricklawn,  
Wexford,  
Y35 AP50.

Via email to [Wastecomments@DCCAE.gov.ie](mailto:Wastecomments@DCCAE.gov.ie)

21<sup>st</sup> February 2020

**Re: Public Consultation on the Proposed Waste Action Plan**

Dear Sir/Madam,

AES, as a wholly owned company within Bord na Móra plc, welcomes the opportunity to respond to the *Public Consultation on the Proposed Waste Action Plan*.

**Background AES- Bord na Móra**

AES is one of the leading Irish waste management companies with over 120,000 domestic customers and more than 4,500 commercial customers across Ireland. Bord na Móra's Waste Collection business, AES, provide a wide variety of bins to facilitate kerbside collection of separately collected waste streams. AES offers a 4 bin collection system (Residual, Organic waste, Recyclables, and Glass) to household customers in a large number of towns and cities across the country. Similarly, AES prides itself in providing appropriate waste segregation solutions tailored to the needs of any business from local shop to Blue Chip manufacturing company.

The wider Resource Recovery business unit within Bord na Móra, operates two waste transfer centers, three waste recovery facilities, a mixed dry recyclables recovery facility, a bio-waste facility and a landfill site, which incorporates a landfill gas recovery facility - currently providing the electricity to the national grid equivalent to the annual needs of over 8,500 households. A range of advanced waste processing, segregation, treatment and recycling technologies are deployed at these waste facilities for efficiently and economically extracting the maximum benefits from waste, and minimising waste for disposal. In addition, AES Bord na Móra has begun plastic recycling in Ireland by repurposing a former briquette factory in Co. Tipperary. This facility is currently recycling farm plastics but will expand to other types of plastics in the near future. This recycling venture compliments the company's recycling of 'end of life tyres' at the Donore Road tyre processing facility in Co. Louth. At this facility, tyres are transformed into reusable material and products for football pitches, equestrian rubber, horticultural bark and more. The Donore Road facility is the only plant in Ireland capable of complete tyre recycling and produces a full range of rubber granulate suitable for many end market uses in Ireland and the UK

**General Position on the Consultation**

AES Bord na Móra is an active member of the Irish Waste Management Association (IWMA) and has contributed extensive input, views, opinions and recommendations into the association's submission to this consultation. In this respect, AES Bord na Móra fully endorses the messages and responses in the IWMA submission.

The strength of the IWMA submission is the fact that the association represents a broad spectrum of waste management activities, so there is no inherent bias towards or against any particular waste management options. However, given the broad church of the membership, complete unanimity on all policy areas is sometimes difficult to achieve. Being mindful of this reality, and in the interests of limiting repetition, this response can be read as fully supporting the IWMA submission, but where necessary AES Bord na Móra's own views on specific questions are included by exception, see below.

### **AES Bord na Móra's responses in addition to the IWMA's submission**

#### 3.4.2 Brown Bin Roll-Out to Rural Areas

AES Bord na Móra believe that the roll out of Brown Bins to **all** householder across the State should continue in an orderly and managed fashion.

Such an orderly and managed approach to a nationwide roll out of Brown Bins also necessitates the relevant enforcement authorities clamping down on service providers who i) do not provide a Brown Bin and ii) offer a collection service offering/product which does not incentivise consumers to fully utilise their Brown Bin for the appropriate waste streams.

#### 4.1 What are the underlying causes of food waste in Ireland?

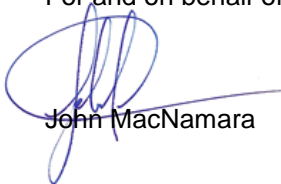
In addition to the IWMA response to this question, AES Bord na Móra are also of the opinion that as Ireland has prospered over the recent decades, less food is prepared in domestic kitchens, but is instead prepared in commercial kitchens for consumption on premises and at home; hence it is imperative there is considerable focus on this sector when developing plans to reduce food waste in Ireland.

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

Policy in Ireland is beginning to coalesce with a degree of coherency that has been lacking in the past; the Climate Action Plan acknowledges that Irish and regional waste policy is based on a waste hierarchy: waste prevention; preparing for reuse; recycling; and energy recovery and provides the platform for progressing the Circular Economy. It is the area of green energy production, that is the obvious nexus between the waste industry and the wider policy goal of a Circular Economy – in particular, waste collection companies must be incentivised and facilitated to use their biogenic feedstock for the generation of renewable energy (both electricity and biomethane) while the agricultural sector should be the default outlet for compost or bio-fertilisers (digestate) that are subsequently produced.

Should you have any questions or require further information, please do not hesitate to contact us.

For and on behalf of AES Bord na Móra,



John MacNamara