



# WASTE ACTION PLAN FOR A CIRCULAR ECONOMY

A consultation response from Beuparc  
Utilities

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Beuparc Utilities is the parent company of Panda Greenstar and is the largest waste company in Ireland. Recycling and the Circular Economy are at the core of Beuparc's activities

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## A. Introduction

### A.1 About Us

Beuparc started operations in 1990 in Co. Meath with a team of just two people. Beuparc has now grown to employ over 3000 employees and operates on more than 40 facilities across Ireland, the United Kingdom and the Netherlands. Its portfolio of companies includes recognisable brands such as Panda, Greenstar, Panda Power, WSR, A1 skips, Mid-UK, AWN, New Earth Solutions, OZO, Spanners and Bioverda the renewable gas company. Panda is Ireland's largest waste collector and recycler. Every year Panda responsibly manages over 1 million tonnes of Ireland's domestic and commercial waste. Beuparc represents a family of collectors and processors which together manage over 3M tonnes of materials, in the UK and Ireland, annually.

Our activities include collection, disposal, composting, materials recovery, fuel manufacture, recycling and brokering of recyclate.

We are passionate about the circular economy, recycling and sustainability; as the Panda tagline goes: - *We are an animal for recycling.*

### A.2 Format of Response

As there are issues within the consultation document beyond the listed questions, where appropriate we have prepared a line by line response. For ease of interpretation, our responses have been numbered to coincide with the DCCAE consultation document. For example, 3.6.1 refers to the first bullet point in the **Other Policy Measures** in the *Waste Action Plan for a Circular Economy*

### A.3 Context of Response

Beuparc welcomes the opportunity to participate in the consultative process for the formation of the new *Waste Action Plan for a Circular Economy*.

Our subsidiary company Panda has led the way with recycling, and it is Beuparc's vision to become Europe's leading company in the circular economy. Beuparc recognises the significant environmental benefits that past waste policy has brought to our business sector since *Changing our ways*. It is our desire to see a policy that serves the best interest of the environment, our customers, the taxpayer, our employees and our business.

### A.4 Beuparc's Opinion on the Circular Economy

We passionately believe that if we are to achieve a sustainable society, as set out in the UN's 17 Sustainable Development Goals, the majority of the materials our businesses collect must be repurposed as raw materials.

Waste collection as a business model has changed significantly since the 1990's. Previously, the business model was simple and linear; collect waste at businesses and households and move it to the local landfill, as illustrated in Figure 1 Below.



Figure 1 Linear Consume and Dispose Model

Our understanding of the circular economy is summarised by the below diagram (figure 2), which is adapted from EU and UN documentation on the circular economy.

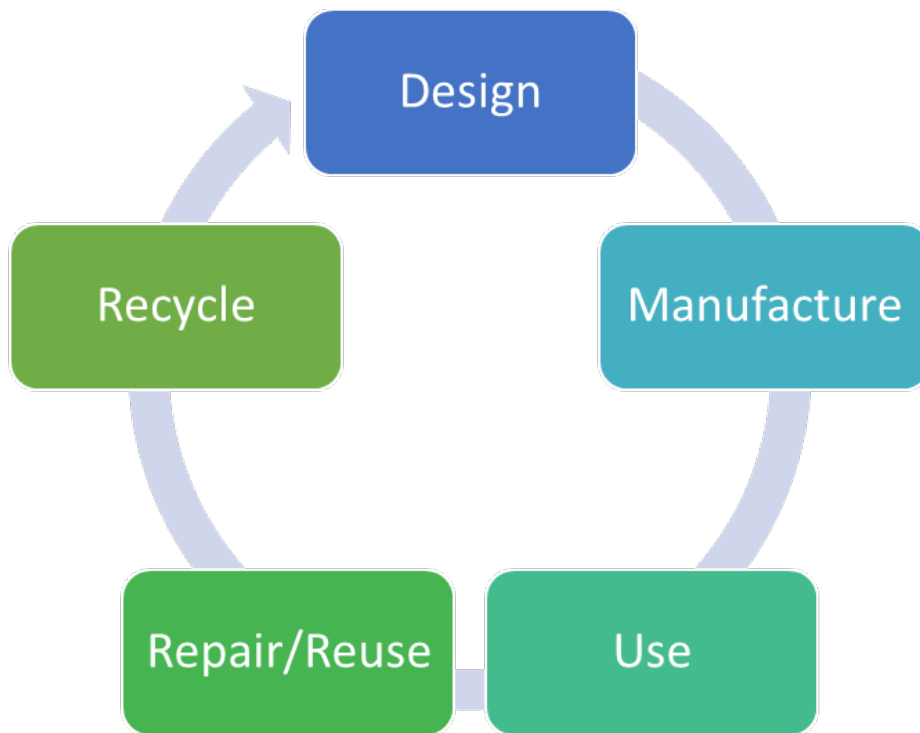


Figure 2 The Circular Economy Model

In 2020 the business model for our sector involves processing to extract recyclable and recoverable materials, broker and trade these materials as commodities; manufacture materials and fuels to meet strict production standards. In effect our industry has moved from collect and dump to collect and make.

# Opportunity, Not Waste!



## Raw Materials

- Aluminium, Steel, Copper
- Stone, Glass, Hard and soft plastics



## Fertiliser

- Compost
- Soil Improver



## Fuel

- SRF
- RDF
- Landfill gas

Figure 3 Opportunity for the circular economy

## B. Responses

## Key Messages in Response to Consultation Document

As a business, our focus is on finding sustainable outlets for the materials we collect. However, it must be understood by policy makers that we are required to manage all of the materials we collect from our customers, irrespective of whether they are recyclable. We have little control over what wastes our customers generate.

It is our strongly held view that in order to facilitate a functioning circular economy, far more needs to be done on the DESIGN and MANUFACTURE elements of the model illustrated in figure 2, above. Products sold to consumers must be “Designed and Made for the Circular Economy” and not made for disposal.

In order for the circular economy to function, the materials we collect must be recyclable and there must be a market for recycle. The current situation is that far too much of the material we collect cannot be economically recycled, irrespective of our desire to do so. We cannot state strongly enough that the imposition of recycling targets on collectors is pointless, without addressing product design and manufacture. This is not us seeking to shirk our responsibilities, it is a simple statement of chemical, physical and economic reality.

In our view, the overriding priority is in the area of producer responsibility and to bring the *Polluter Pays Principle* back to the manufacturers. A secondary priority is to address the gross inefficiencies in end of waste certification. The final piece of the circular economy jigsaw is the creation of links between collectors/recyclers, standards bodies, designers and colleges in order to ensure that recyclers are producing raw materials that are fit for use by manufacturers.

Beuparc is of the view that the attainment of recycling targets of up to 65% will be impossible to achieve without significant work being done on producer responsibility, pricing/regulating non-recyclable materials out of the market, eco-design and the use of circular economy measures in manufacturing.

As an interim measure, the classification of the manufacture of high quality Solid Recovered Fuel (SRF) as End of Waste (EoW) and therefore recycling, could be highly beneficial. This measure would allow for easy achievement of the 65% recycling target. EoW could be applied where highly refined SRF is used in Ireland as a transition fuel to replace imported fossil fuels in applications such as peat and coal fired power stations.

It is our view that a specific circular economy office may be required to form a link between Enterprise Ireland, Repak, Colleges, Manufacturers, Regulators, Standards Bodies and Collectors, with the ultimate role of moving materials away from disposal and into the circular economy.



## 2.0 Institutional Arrangements

### Consultation Questions - Institutional Arrangements

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

Beauparc is of the view that the current institutional arrangements are generally functioning well. We welcome the consistency brought by the WERLAs, and the coherent planning provided by the regional waste plans.

Whilst the EPA's Office of Environmental Enforcement has driven a welcome improvement in standards in our industry, we have a concern that the Agency, as currently configured, is not equipped to cope with the pace of change in our industry. The Agency was formed in an era when the environmental focus was on end of pipe solutions, e.g. improvement of emissions from factories into rivers, reduction of nuisance issues etc. However, environmental protection is now urgently required to address and focus on much broader sustainability issues and more diffuse pollution problems.

It is widely recognised that there is an urgent need to move from a linear economy to a circular economy and also to be able to react to often radical market shifts. In this context, delays of years for EPA approval for relatively simple process changes is unsustainable. Likewise, the capacity to approve end of waste decisions must be urgently streamlined. Nowhere is this more obvious than in the area of Construction and Demolition waste. Throughout Europe it is common to incorporate waste from demolition activities back into new developments. In fact, building sustainability standards such as LEED and BREEAM call for the inclusion of recycled materials in new buildings. The disposal of recyclable C&D material, in our view, represents a triple environmental negative: Carbon emissions from transport to disposal, additional resource extraction and carbon emissions from transport of virgin materials. We believe that there has been too much focus on prevention of minor site specific environmental risks, without regard to broader more significant sustainability costs.

It is our view that a specific circular economy office may be required to form a link between Enterprise Ireland, Colleges, Manufacturers, Regulators, Standards Bodies and Collectors, with the ultimate role of moving materials away from disposal and into the circular economy.

A further concern is with the two-tier EPA/Local Authority regulation, which results in a much higher cost overhead for EPA licensed sites than local authority sites.

We echo the IWMA position:-

*The two-tier system that comprises EPA regulation and Local Authority regulation puts too much focus on licensed sites, inconsistent enforcement of permitted sites and too little focus on unregulated waste activities, where the criminals can be found.*

*Many local authorities perform their enforcement functions very well, but the system falls down when some local authorities take a below-standard approach to regulation and enforcement of waste management activities. This has left a gap for criminal activity that harms the reputation of the waste sector.*

*The IWMA has previously called for a single entity, such as a fully resourced EPA to regulate and enforce all waste management activities, without fear or favour. As a minimum, we suggest that the EPA should have strengthened powers to step in and take over a case when a local authority is not able or willing to enforce unauthorised or criminal activity.*

**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 an urgent need to apply the *Polluter Pays Principle* to product and packaging manufacture. This can be applied through producer responsibility or fee modulation. This is further addressed in numerous points below.

Greater awareness, education and incentives are also required to encourage better behaviour on the part of consumers.

Improved product and packaging labelling is also required. Packaging often contains very confusing and sometimes completely incorrect labelling with regard to recycling. For example, the labelling on the packaging shown in figure 4 below is correct in that coloured PDPE is technically recyclable, however from an economic and environmental perspective LDPE films should be placed in the black bin and not in the recycling bin. Therefore, the LDPE wrapper, placed on the Irish market, is not recyclable and should not be labelled as such.



Figure 4 Recyclable, but at what cost? Where? And who pays?

### 3.0 Municipal (Household and Commercial) Waste

#### 3.6 Other Policy Options and Measures

**3.6.1 Collectors will be required as a condition of their waste collection permit to meet municipal waste recycling targets (i.e. will be required to achieve a 55% recycling rate of municipal waste by 2025, 60% by 2030 and 65% by 2035).**

**Beauparc Response:-**

We are concerned that one of the first policy measures in a new Policy Document for the Circular Economy opens with the suggestion that recycling targets should be imposed on waste collectors.

Panda has led the way with recycling, through the development of an advanced contamination detection system (CDS) various end of waste applications, and

continuous improvement of its MRF. The CDS system is being rolled out across our brown bin and green bin collection fleet and through appropriate engagement with our customers the CDS is making a dramatic difference to contamination levels. However, just because a material is clean and can be separated does not mean it can be recycled economically. For example, see figure 4 above.

If mandatory recycling targets are imposed on our business, as collectors we have a significant concern that we could be prosecuted for not reaching the above targets, despite having very little control over the contents of bins or how recyclable materials are.

It is the vision of Beuparc to become Europe's leading company in the circular economy and as a result we actively want to maximise our recycling figures. However, we strongly believe that the insertion of a condition mandating the achievement of municipal recycling targets on collectors is unworkable for the following reasons.

1. The resource recovery industry cannot recycle non-recyclable materials. Economically un-recyclable materials will not be recycled without wasteful subsidies or increased customer charges. For example, there is no commercially sustainable recycling option for a significant amount of packaging and end of life products that end up in MSW, e.g. plastic films such as that illustrated in figure 4 above.

Beuparc wants to maximise recycling of resources for the circular economy, but if a material cannot be recycled, it will remain unrecyclable irrespective of any targets imposed. It is the view of Beuparc that Eco-design measures must be incorporated into product and packaging manufacture to allow for materials to effectively re-enter the circular economy at end of life.





Figure 5 Irrespective of targets imposed, a significant portion of packaging is wholly unrecyclable.

2. The imposition of mandatory recycling targets on the collectors is against the **polluter pays principle** as it is seeking to transfer environmental responsibilities away from the waste producer/consumer and onto the collector.

For example, the waste volumes received by the collector are constant, and as experienced through various system shocks (current India paper restrictions, Chinese National Sword Policy etc.) recycling outlets/markets can be highly volatile. Therefore the only mechanism that the contractor has to deal with fixed recycling requirements will be to impose increased costs on the customer. This will be economically inevitable, as collectors will be forced to provide a fiscal incentive to the recycle off taker in order to guarantee steady outlets. To the average customer this will look like price scalping, it won't be understood as an environmental cost and will potentially increase illegal dumping.



Figure 6 Everything here is plastic, everything here ends up in our collection centres, but how much can we recycle?

3. The department must recognise that not all recycling is equal. For example, in the past much so called “recycling” was simply the transfer of mixed materials to developing countries, with no accounting for the environmental impacts associated with the transport and the processing of recyclate in the destination countries. It is the view of Beuparc that the majority of recycling should be local to Ireland, the EU or at least subject to equivalent environmental controls as apply in the EU. In many cases, local recovery is likely to be preferable from an environmental life cycle assessment perspective, when compared with long haul recycling and the non-inclusion of external environmental/social costs in long haul destinations.
4. A significant quantity of recyclate is removed from Collectors through civic amenity sites.
5. Any future deposit return scheme will further undermine Collector's kerbside recycling rates.
6. Contents of black bags and bags within residual bins cannot be examined by the Collectors, irrespective of Contamination Detection Systems (CDS), and therefore any enforcement of targets on our customers is virtually impossible.

## Beauparc's Suggested Policy Options to support 55%, 60%, and 65% recycling rates

- Eradicate non-recyclable goods and packaging from shop shelves through levies and/or enhanced producer responsibilities.
- Improve product and packaging labelling.
- Classify the manufacture of high quality Solid Recovered Fuel (SRF) as End of Waste (EoW) and therefore recycling. Switching SRF to recycling would allow for easy achievement of the 65% recycling target by 2025 and allow a workable transition period away from non-recyclable packaging.

EoW could be applied where highly refined SRF is used in Ireland as a transition fuel to replace imported fossil fuels in applications, such as peat and coal fired power stations. SRF contains approximately 50% of the fossil carbon of coal and is therefore significantly less carbon intense than coal.

As the remaining thermal facilities have only between 10 and 15 years engineering lifespan remaining, the use of SRF in these units would be an ideal temporary solution, allowing the transition to a fully circular economy over a reasonable time period, while still allowing compliance with the 50-65% recycling rates.

The Waste Framework Directive (2008/98/EC) establishes certain conditions that must be complied with by the end of waste requirements. A given waste may only cease to be a waste if:

- The substance or object is commonly used for specific purposes.
- A market or demand exists for such a substance or object.
- The substance or object fulfils the technical requirements for the specific purposes and meets the existing legislation and standards applicable to products.
- The use of the substance or object will not lead to overall adverse environmental or human health impacts.

We are confident that a robust and reasonable case can be made for a highly refined SRF to reach the criteria set out in the waste framework directive. In fact an SRF product has already been granted End of Waste status in the Netherlands.

The use of a highly refined SRF will facilitate the transition away from fossil fuels until zero combustion alternatives can be economically implemented. The use of SRF as a fuel could be a fixed time mechanism

implemented to consume non-recyclable materials in existing thermal energy facilities, until such time as non-recyclable materials are removed from the market place.

The primary raw materials for SRF are not currently recyclable and are comprised of a mix of paper and card fragments and plastic films wrappers, such as the type illustrated in figure 4.

SRF use in existing power stations would allow the retention of skilled employment in the rural communities where the power stations are located, such as Co. Clare. SRF can be refined to very high standards and consumed in conventional peat and coal fired stations. SRF is now commonly used in electricity generation plants across Europe. There is an outlet potential of a minimum of 500,000 tonnes per annum of SRF if a single coal/peat fired generation station was converted. SRF could be used as a lower carbon transition fuel, in existing fossil fuel fired power stations, until non-combustion energy generation alternatives reach maturity.

Beauparc is aware of the recent An Bord Pleanála decision with regard to the conversion of the peat fired power station in Co. Longford, and the refusal on the grounds of the sustainability of importation of biomass from Australia and the issues of road transport to the site, which was previously fed with peat transported by rail. We believe that these grounds for refusal would be addressed through the use of an indigenous fuel such as SRF and the utilisation of existing fuel transport methodologies, without recourse to use of the road network.





*Figure 7 Highly Refined SRF Pellets developed by Beuparc*

Beuparc have already conducted significant research in the area of SRF refining and is aware that such moves are already underway in UK and elsewhere in Europe.

We are eager to work with DCCAE to explore this option further.

***3.6.2 The provision of an organic waste bin will be mandatory as part of a waste collection service for all households.***

Beuparc Response:-

Beuparc fully supports this policy measure.

***3.6.3 The existing national standardised list of items acceptable in the mixed dry recycling bin will be revisited with a view to expanding the list to capture more recyclate.***

Beuparc Response:-

As per 3.6.1 Beuparc stresses the importance of imposing enhanced producer responsibility to ensure that more of the products and packaging placed on the market is recyclable and are clearly labelled. We welcome recyclable

items being placed in the green bin, however are unsure how the list of items acceptable in the mixed dry recycling can be expanded, unless the items are recyclable and can be separated efficiently in existing materials recovery facilities.

Further detail on this proposal is required.

#### **3.6.4 Separate litter bins for recycling waste (including organic waste) will be provided on streets and by commercial premises.**

Beauparc Response:-

Beauparc fully supports this policy measure. It is a key element of public engagement in recycling.

We are eager to work with DCCAE to explore this option further.

#### **3.6.5 Additional municipal recycling infrastructure will be developed nationally.**

Beauparc Response:-

Beauparc fully supports this policy measure, provided the polluter pays principle is adhered to, technologies are real world proven. However, all infrastructure should be fully viable, and not dependent on government subsidies, except in exceptional circumstances.

#### **3.6.6 Standardised Colour Coding of Bins**

Beauparc response:-

We are concerned that a significant phasing period would need to be allowed, in order to prevent wasting existing bins. Special provision would also have to be made for areas that have used the green bin as a residual waste bin for many years, or blue bins for recycling.

Beauparc is not opposed to this measure, provided it is sensible and phased to avoid any wasting of serviceable bins. It would therefore have to be limited to the natural replacement of bins.

Perhaps as an initial effort, a standardised terminology could be used e.g. Food bin, Residual bin, Recycling bin.

### **3.6.7 Quality Waste Management Assurance Scheme for Businesses.**

Beauparc Response:-

More details will be required in order for Beauparc to provide an informed opinion on this proposal.

## **3.7 Municipal Waste Consultation Questions**

***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?***

As outlined in 3.6.1 above, we believe that enhanced producer responsibility has a significant role in the circular economy. Existing recycling labelling on packaging is very confusing to consumers. One role the producers could play is in the enhanced labelling and simplification of recycling instructions. Retailers could promote MyWaste.ie

There is also scope for fee modulation to be applied by Repak, with enhanced fees payable for non-recyclable packaging. Part of the additional income from fee modulation could be earmarked for funding advertising campaigns and public information.

A significant issue is the need to create a market demand for recyclate to migrate towards higher points in the recycling chain. The mandating of minimum recyclate content in new products and packaging is likely to be the only mechanism to ensure that a local market exists for recyclate.

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

Fee modulation is a critical measure necessary to ensure that the Polluter Pays principle is adhered to. Repak could also play a leading role to ensure that producers and retailers incorporate recyclate in their packaging and new products.

Mywaste.ie is working well, however there is always room for improvement. Retailers could promote this website better. A more collaborative approach should be taken between, industry, retailers, repak and regulators to ensure that the best possible measures are taken and the message is relevant and timely. This could be a role for the circular economy office.

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

Beauparc is rolling out its contamination detection system. This equipment, used in conjunction with customer follow up has yielded very significant improvements in the quality of recyclate and reduction in contamination.

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

No further comments

***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?***

Producer responsibility, polluter pays and proximity principles are the key components to the circular economy for both products and packaging. There must be mechanisms in place to drive a circular economy. These mechanisms must include fiscal penalties on producers that produce non-recyclable products and packaging. There must also be targets imposed to ensure incorporation of recyclate into new packaging and products, i.e. minimum recyclate content.

The focus needs to be moved from “waste management” to “resource recovery”.

Inevitably, given the investment in existing economic models, it will take a considerable time to progress from a linear economy to a circular one. Therefore, it is the view of Beauparc that the classification of SRF as recycling is a required component of the transition to a fully circular economy.

The longer term picture must include a cohesive strategy to enable the collector's upskill and participate in research and development programmes towards producing goods and raw materials from waste.

### 3.8 Household Waste Consultation Questions

***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 is an excellent method to drive the polluter pays principle, however it is our view that there is need to improve the existing system, as there are too many charging mechanisms in place that pay lip service only to incentivised charging.

The polluter pays principle must be adhered to.

***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?***

Beauparc would welcome such a scheme. As all bins are weighed it is possible to measure a waste to recycling ratio or index.

Trials are being run with REPAK on a similar project.

We would welcome an opportunity to engage with DCCAE in this area.

***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?***

Civic Amenity Sites already play an important role and have the potential to play an enhanced role. Used correctly they can play a significant role in customer communication and provide a one stop destination for materials than cannot be placed in household bins, such as bulky goods.

Standardisation of Civic Amenity Sites is a proposal worth considering. However it must be borne in mind that some CASs are on EPA licensed site and the EPA can take more than 2 years to authorise trivial changes to a licence. Planning permission is also a consideration and therefore a lengthy phasing period would be required.

Standardised CASs should accept all wastes, hazardous, electrical, bulky, recyclable, garden and household. In order to be of benefit to the local

communities in which they operate. CASs should be a one stop shop for consumers, however general waste disposal should be weighed and priced in a manner that supports kerbside collection.

Metal theft and scavenging continues to be a significant problem at CASs, therefore legislation is required to cease cash payments for metal, in order to make CASs a more pleasant place for customers to visit.

The concept of using CASs as centres for dedicated exchange, reuse and upcycling is one that Beuparc supports and has been piloting. Storage, theft prevention, littering and supervision however are all significant issues. Also all EPA licensed sites have a condition which prohibits waste scavenging.

This is a complex issue, which can only function with the engagement of NGOs, such as charity shops, who can sort, collect and sell on items.

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

Waste management at apartment complexes is arranged by the management company and the cost is invariably more important than the recycling and waste prevention outcomes. That dynamic needs to be tackled by the State, with the support of the waste collectors.

It should be mandatory to charge for each waste type by weight and to provide incentivised pricing to encourage waste prevention and recycling. There would then be an incentive for the apartment management company to inform, encourage and incentivise the residents to use the system correctly.

The Quality Waste Management Assurance Award Scheme, suggested in the consultation document, could be applied to apartment complexes. The scheme should involve the inspection of records and inspections of bins by independent auditors. It would be ideal if this was somehow tied to a financial reward and/or penalty system such as rates or water/wastewater charges and the savings/charges passed on to the apartment dwellers via their service charges. This could lead to peer pressure and self-policing by the residents.

A successful scheme was implemented by Panda in partnership with Dublin City Council at Temple Gardens apartment complex with 600 apartments last year.

### ***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?***

Please see our comments on the circular economy elsewhere in this document.

### 3.9 Commercial Waste Consultation Questions

***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?***

Pay by Weight should be implemented immediately.

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

Consideration should be given to imposing standard waste collection charges for persistently contaminated Green and Brown bins. Despite the cost of contamination of green and brown bins, there is reluctance on the part of the collectors to impose standard charges unilaterally, as the business may move to a new collector who will not impose the same charges. We recommend the introduction of a ban on placing food waste, garden waste and recyclable wastes in residual waste bins at commercial premises accompanied by enforcement.

***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)?***

Beauparc is broadly supportive of this measure, however more details will be required in order for Beauparc to provide a fully informed opinion on this proposal. The Quality Waste Management Assurance Award Scheme as suggested in the Waste Action Plan may be applicable here.

***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?***

Beauparc's vision is to become the leading company in the circular economy, however to achieve this, we must be presented with recyclable material, and

have outlets for the recyclate we process. It is our strong view that the transition to a circular economy cannot be achieved simply by tweaking waste management practices. The foundation for a successful circular economy is the incorporation of eco-design elements into product and packaging, enhanced producer responsibility, followed by the enabling of local recycling markets through the setting of minimum recyclate content in packaging and relevant products. The key concept here is “Designed and Built for the Circular Economy”.

The performance of the circular economy can then be enhanced through improved labelling and the education of consumers. Waste management practices can be improved by contamination detection systems and increased investment in material recovery facilities.

## 4.0 Food Waste

Beauparc recognises the need to reduce food waste and in particular the need to reduce food waste entering the black and green bins. Beauparc companies are playing their part in this through the roll out of the contamination detection system to our brown bin fleet.

Beauparc also recognises the strong role that composting can play in the reversal of soil loss and the enhancement of soils for the purposes of carbon capture and storage. Beauparc is continuing to invest in its Acorn composting business and is also playing an active role in the development of restoration media for future carbon storage projects.

## 4.7 Food Waste Consultation Questions

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

A combination of cheap food prices, packaging and marketing methodologies on the part of retailers and a lack of consumer awareness.

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

We are uncertain who this would be applied to and how this might work.

### ***How can Ireland become a ‘farm to fork’ global leader in food waste reduction?***

Beauparc have no comments with regards to this question.

### ***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?***

Beauparc have no comments with regard to this question.



## 5.0 Plastic and Packaging Waste

Beauparc welcomes the Extended Producer Responsibility model. The majority of plastic packaging is not economically recyclable and irrespective of economics, significant questions arise as to the environmental cost benefits associated with the recycling of some plastics. The achievement of 55% recycling rate of plastics by 2030 is almost entirely dependent on a meaningful reduction in the volumes of non-recyclable plastic waste being placed in the market.

### 5.4 Where We Need to do Better

Where plastics are recyclable the market is currently functioning well, with demand for well processed single stream recyclates such as PET, HDPE and LDPE. While incremental improvements can be made through educating the householders, and commercial generators to divert recyclable plastics away from the Black bin to the Green bin, the primary problem remains the volume of non-recyclable plastic in the market and the prolific use of this material by retailers and producers.

### 5.5 Short Term Measures 2020

The development of meaningful eco-modulation in the fee structure for EPF is an essential first step. However Beauparc has consistently suggested that a plastics forum should be established in order to provide a mechanism to link plastic manufacturers with collectors.

In 2018 Beauparc made the following suggestions to Repak, as part of their plastics consultation:-

- 1. A packaging waste forum needs to be established in order to align the goals of packaging producers with the practicalities experienced by waste recyclers and waste exporters.*
- 2. Packaging producers need to incorporate "Eco-Design" aspects into their packaging, which in so far as is possible, match the technology for processing and sorting co-mingled recycle.*
- 3. Recycling information should be clearly identifiable on the packaging to assist source segregation and manual sorting at a materials recovery facility.*
- 4. Eco-design should incorporate design features which work with optical separation technology at materials recovery facilities.*
- 5. Additional work needs to be undertaken to identify and remove from the supply chain materials currently labelled as recyclable, but for which little or no recycling solution exists.*
- 6. Through a waste forum, the waste processing industry needs to engage with product designers, consumers, packaging producers and retailers to educate them of the practical difficulties associated with recycling co-mingled recycle.*

7. *A market for recyclate, produced in Ireland, needs to be created in Ireland in order to allow for displacement of virgin plastic with domestically produced recycled plastic.*
8. *A labelling system that provides details on the recycled content of packaging should be rolled out.*
9. *A special responsibility should be placed on the producers of single-use plastics to ensure that their products are designed for recycling.*
10. *Standards for the design, production and use of recycled plastic need to be produced by the NSAI.*
11. *The reliance on recycling in countries with questionable environmental performance needs to be financially discouraged.*
12. *The landfilling of recyclate should be financially discouraged.*
13. *There needs to be a fiscal incentive for plastic packaging to be recycled in Ireland.*
14. *The consumer education on recycling should be improved.*
15. *Plastics and packaging manufacturers need to be mandated to include minimum contents of recycled polymers in their packaging.*
16. *A mechanism should be created to ensure a level playing pitch for high street and on-line packaging producers.*

## 5.6 Other Policy Options and Measures

5.6.1 Beuparc is of the view that eco modulated fees should be applied equally to both Irish Packaging producers/retailers and imported/online packaging producers.

## 5.7 Plastics and Packaging Waste Consultation Questions

### **How can we make it easier for citizens to play a role in delivering on our targets?**

1. By removing non-recyclable packaging from the market, or creating a new category for plastic films that are suitable for the production of SRF.
2. Develop further awareness and education to ensure that all citizens have the required knowledge on what material to put in each bin and what should go to bring centres, CA sites, take-back shops, etc.
3. Better labelling on packaging products. When a citizen is deciding whether a packaging item is recyclable or not, they are likely to look for information

on the item. The labelling is generally confusing and not helpful in that regard. In fact, non-recyclable complex products such as crisp packets displaying the REPAK logo can misinform citizens into thinking that the item is recyclable and should be placed in the MDR Bin. That leads to contamination of the MDR bin and can impact on the quality of the paper. We therefore suggest that recyclable items should have a message that says 'place in dry recycling bin' or 'place in food waste bin' or 'place in bottle bank', etc. Non-recyclable items should have a message that says 'place in general waste bin'.

4. Beuparc would support an outright ban on non-recyclable packaging, however in the absence of a ban, any packaging items that are non-recyclable should be levied to make them more expensive than recyclable alternatives. Alternatively, they could be made to pay much higher eco-modulated fees as part of their producer responsibility obligations.

### **Do waste collectors have a role to play?**

As stated in 3.6 above, Collectors have no choice but to deal with the materials placed in bins. If materials are unrecyclable they will remain unrecyclable.

Waste collectors need to keep informing their customers of the items accepted in each bin and what to do with items that are not accepted at kerbside,

Waste collectors need to charge in an incentivised manner that encourages citizens to prevent and recycle waste at home, at work and everywhere else.

The incentivised charging system must not have weight or volumes allowances that are too large to be effective in changing behaviour.

### **Q3. What is the role of retailers?**

A casual walk around any supermarket will reveal the extent to which non-recyclable plastic is used in both packaging and products, see figures 4 and 5 above as an example. Retailers must be held to account over the use of non-sustainable packaging.

Retailers should use their marketing skills and budget to inform customers of mywaste.ie and how to recycle their packaging waste.

### **Q4. What is the role of manufacturers?**

Producer responsibility is the start and end point in the circular economy, as illustrated in figure 1 above. The producer starts with design factors that influence the entire life cycle of the product and the packaging. Much more must be done on the design element of product and packaging manufacture.

Steps should be taken to internalise the external uncompensated environmental costs associated with the production of materials which ultimately become waste.

Manufacturers should also be obliged to label their products to identify whether they should be placed in recycling, food waste or general waste bins.

Manufacturers must be mandated to use recycle in their products in order to drive a market for recycle.

**Q5. Is there a role for voluntary measures (individual or by sector) and if so, what might they be?**

Environmental cost/benefits are extremely complex and usually misunderstood by customers and are sometimes misunderstood by experts. Therefore voluntary measures should not be relied on to achieve targets. Nowhere is this more obvious than in the debate on plastic bottles. A retail chain recently banned plastic water bottles from its shop shelves in response to customer concerns about Ocean Plastics. The ban was initiated despite the fact that PET bottles are very recyclable and are valuable in recycling markets. The retail chain continues to sell lots of other non-recyclable plastic items with plastic film packaging.

An important issue to consider here is the fact that consumers are targeted with advertising and marketing budgets of billions of euros, to the extent that voluntary measures by individuals become almost meaningless. Pressure needs to be applied on the polluters.

**Q6. Are there targets other than EU that we should be striving towards?**

Yes, the elimination of non-recyclable packaging, and the elimination of the use of 100% virgin plastic in packaging.

**Q7. 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?**

The success of the landfill levy has clearly shown the benefits of the imposition of fees on polluting practices. We believe that eco-modulated fees are an excellent place to start, particularly if a clearly escalating fee is visible in advance. If unsuccessful after 24 months, other measures may be needed.

**Q8. 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?**

Eco design, Producer Responsibility and inclusion of minimum recycle contents. "Designed and Built for the Circular Economy"

## 6.0 Single Use Plastic

Beauparc fully supports the SUP directive and in particular the incorporation of minimum recycled content in plastic products. We are concerned however with the degree of focus on achieving a 90% recycling rate for plastic bottles. Whilst we support this target, in our view there should be greater focus on reducing the amount of single use plastic packaging, particularly plastic films as a first step.

### 6.4.3 Deposit Return Schemes

We have a number of issues with deposit return schemes for plastic bottles. As referenced above in 3.6.1, the imposition of recycling targets on collectors is futile unless the contents of the green bin are recyclable. PET and HDPE plastic bottles are readily recyclable and there is a steady market for this material when presented as a single stream from material recovery facilities.

Whilst a deposit return scheme may focus public attention on a small component of waste plastics, it must be understood that there is a fiscal incentive for collectors to recycle PET and HDPE bottles. Therefore, the diversion of PET and HDPE bottles from the green bin to a deposit return scheme will financially undermine the viability of material recovery facilities, by removing the valuable part and leaving the MRF operator with lower value materials and non-recyclable packaging. We also see the provision of a deposit return scheme for PET and HDPE bottle as being an expensive capital investment which overlaps with and undermines the existing system of co-mingled collection in the green bin.

Perhaps a hybrid system that rewards customers for using the green bin might be workable. We are open to engagement with DCCAE on the development of a system that rewards environmentally beneficial behaviour on the part of customers and encourages kerbside recycling.

### 6.6 Single Use Plastics Consultation Questions

We firstly refer DCCAE to our previous submission on levies. This is attached as Appendix 2.

***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?***

Single use food containers are inevitable to a large extent as food must be protected during transport and storage. However, we recommend that all food containers should be easily recyclable and should be labelled in a way that makes it easy for consumers to segregate them correctly.

A ban on non-reusable cups would undoubtedly be challenged by the coffee shops and could attract strong public opposition, so a meaningful levy on single use cups would have more chance of an effective outcome in the short term.

***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?***

The polluter pays principle should be applied and a charge applied for non-reusable goods.

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

When the current co-mingled collection is processed at a modern MRF the recovery rate for PET is 99.5% (Panda MRF rates 2019). Our position is that if the PET is placed in the green bin, we will deliver over 98% collection rate. Measures such as on street recycling bins, advertising and packaging labelling need to be introduced to encourage consumers to place PET bottles in the correct bin.

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

Yes, the polluter pays principle should be applied, where practicable.

***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, if the levy is applied at a higher level on non-recyclable food containers.

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

While not wholly SUP related, a significant issue arises with non-rechargeable batteries in the residual bin. The batteries give rise to harmful emissions when combusted in energy recovery facilities and are hard to remove in waste processing systems. Perhaps a levy on single use batteries should be considered.

***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%?***

There is potential for Ireland, through units in Athlone IT and TCD, to become international experts in this regard. As stated previously in this document we support the circular economy and are of the view that materials must be designed and built for the circular economy and that new materials must contain minimum contents of recycle in order to ensure a market exists for recycle.

There are a number of technical issues here that need to be explored.

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

PET containers are readily separated in modern MRF plants through the application of optical sorting equipment. Our own analysis of recovery rates has demonstrated that we can recover over 99.5% of PET bottles from the co-mingled bin in our MRF. Therefore we can state with confidence that if PET material is placed in the green bin it will be separated and recycled. Beuparc see no need to provide additional infrastructure for PET bottles. In fact, the removal of PET from the Recycling Bin, will undermine the financial model as currently applied to the Recycling bin.

Beuparc is currently installing an optical separator to recover PET bottles from MSW.

***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?***

Beuparc wishes to clearly state that it strongly supports recycling of plastic beverage containers. However, we have very carefully considered deposit and return schemes for plastic beverage bottles in Ireland and cannot see any overall environmental advantage in their use. In fact we are of the view that removing plastic beverage containers from the co-mingled bin risks greatly undermining the financial model on which Material Recovery Facilities (MRF) depend.

As it stands Material Recovery Facilities process co-mingled materials into single streams which are then exported for recycling. In the absence of indigenous recycling outlets, the markets for single stream recycle can be extremely volatile and therefore any undermining of the MRF financial model could, as an unintended consequence, threaten kerbside recycling.

The IWMA, of which Beuparc is a member, commissioned SLR Consulting to prepare a report on the likely impact of a DRS on waste management in Ireland. We attach that report to this submission for your consideration. The

following extracts from the Executive Summary of that report summarise SLR's findings in this regard.

#### *Deposit and Refund Scheme*

*A DRS for PET bottles and aluminium cans is currently under consideration by the Oireachtas Joint Committee on Communications, Climate Action and the Environment. The Waste Reduction Bill 2017 promotes the idea of a DRS in Ireland.*

*In parallel, the Minister for Communications, Climate Action and the Environment has stated publicly he will commission a review which will consider how we can deliver a 90% collection target for single use plastic bottles in Ireland. This review will also examine the possibility of introducing a DRS and how this might operate in an Irish context. Eunomia has been appointed to carry out that review.*

#### *International Examples*

*In this report, we have looked at examples of similar schemes in each of the States in Australia, where SLR has good waste management expertise. SLR's review found that the DRS schemes in Australia were largely introduced to reduce litter. A secondary element was to increase recycling rates. In particular, the South Australia DRS was targeted at increasing recycling rates as it pre-dated kerbside collections.*

*In the schemes that have been introduced in recent years in Australia, efforts have been made to work in tandem with kerbside recycling, rather than to compete against it. The New South Wales scheme pays deposits to MRFs for relevant materials that are recycled. This should be considered if a DRS is introduced to Ireland as the impact of a DRS on the MRF gate fees could have wider consequences in terms of the overall viability of kerbside recycling.*

#### *Potential Impact on Kerbside Recycling*

*SLR consulted with each of the MRF Operators in Ireland to see what impact the removal of plastic bottles and aluminium cans would have on the Material Recovery Facilities in Ireland. The MRF Operators estimated that this would have a €20 to €40 per tonne impact on gate fees at their facilities. Some of the MRF Operators also commented that there would be other impacts to be considered, such as:*

- Without good quality materials, such as plastic bottles and aluminium cans, it is difficult to move lower quality materials such as plastic pots/tubs/trays and plastic films. Reduced recycling of these*



materials would impact negatively on Ireland's recycling performance.

- The processing lines at the MRFs would have to be re-configured to manage the changes to the input materials.
- A DRS is likely to impact on all REPAK subsidies, as the producers of aluminium cans and plastic bottles would not provide subsidy for MRF operations, so the existing subsidy could be reduced for all materials.

Based on the tonnages and values of these materials as reported by the MRF Operators, SLR independently analysed the potential impact on the MRFs from a successful DRS. The results are shown in Tables 2 and 3 below.

**Table 2 Expected Revenue Losses at MRFs if DRS Materials Removed**

Material	Volume Handled (t/a)	Average Value of Material including REPAK subsidy (€)	Loss of Revenue (€)
Aluminium Cans	4,444	915	€ 4,066,260
PET Bottles	11,227	247	€ 2,773,069
<b>Estimated Cost due to Loss of Beverage Containers</b>			<b>€ 6,839,329</b>

Material	Volume Handled (t/a)	Average Value of Material including REPAK subsidy (€)	Loss of Revenue (€)
HDPE Bottles	7,283	415	€ 3,022,445
<b>Estimated Cost due to Loss of Beverage Containers and HDPE Bottles</b>			<b>€ 9,861,774</b>

**Table 3 Expected Increase in MRF Gate Fees for Household MDR if DRS Materials Removed**

Material	Revenue Loss (€)	Household MDR Handled in 2016 (t/a)	Household MDR Handled after DRS materials removed (t/a)	Loss of Revenue per Unit / Potential Gate Fee increase (€)
Loss of Beverage Containers	€ 6,839,329	253,328	237,657	€ 28.78
Loss of Beverage Containers and HDPE Bottles	€ 9,861,774	253,328	230,374	€ 42.81

The increase in gate fees at the MRFs could have very serious consequences on kerbside recycling in Ireland, as the incentive to collect recyclables at kerbside would be reduced to a point where it would favour rogue operators that collect household waste with no source segregation.

#### Likely Increases in Recycling Rates

It is widely accepted that a DRS would have a positive impact on litter, and that has been the focus of many DRS systems across the

world. In particular, a DRS with a high value deposit of c.25 cent is expected to attract litter pickers.

However, the impact on recycling rates is not so clear. In countries that do not have a kerbside collection system for recyclables and have a low recycling rate, the impact of a DRS on recycling rates will be greater than in countries with well advanced systems for collecting recyclables.

SLR examined the quantities of beverage containers already recycled in Ireland and assessed the impact on MSW recycling and packaging waste recycling of an increase to 90% recycling of those materials. The results were as follows:

PET Bottles:

- Total on the market = 25,490 t/a.
- Uplift from 60.7% to 90% = 29.3% = 7,469 t/a extra recycled.
- 7,469 t/a out of a total MSW generation of 2.8 million t/a = 0.27%

Aluminium Cans:

- Total on the market = c.11,456 t/a.
- Uplift from 73% to 90% = 17% = 1,948 t/a extra recycled.
- 1,948 t/a out of a total MSW generation of 2.8 million t/a = 0.07%

Total Uplift in MSW Recycling rate = 0.34%

## 7.0 Circular Economy

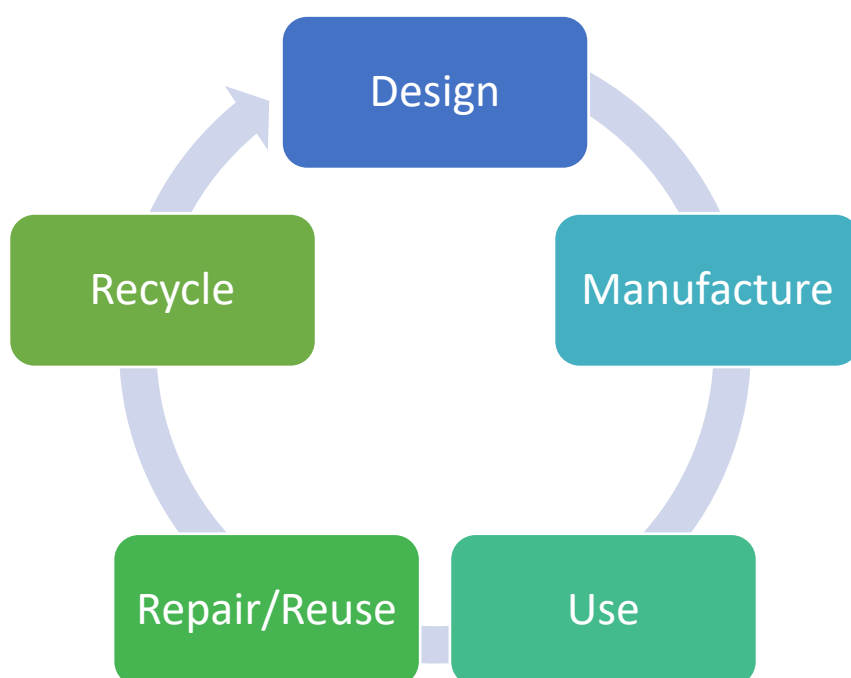
As reported by the *Circularity Gap Reporting Initiative*, the earth's resources are being consumed at unsustainable rates, a movement from a linear economy, to a circular economy will correct this. Whilst we warmly welcome the introduction of the circular economy to national waste policy, Beuparc is of the view that a section on the Circular Economy should be placed at the front of any finalised Waste Policy document, not at section 7.

We recognise the importance of the role of the circular economy in the transition to a low carbon society. It is therefore the vision of Beuparc to become Europe's leading company in the circular economy.

We note National Policy Objective No. 56 and Climate Action Plan Action 135. However, it is our view that both Action 135 and Policy Objective appear to place undue focus on the waste management aspect, and not enough on design and manufacture/remanufacture. Whilst waste reduction is a component of the circular economy, in our view the recovery of resources from waste and the diversion of these resources towards use as raw materials in new goods is of primary importance.

As stated in 3.6.1 above, we are committed to recycling, however we call on the Department to strongly focus on producers and producer's responsibilities in order to ensure that products and packaging are designed to be recyclable. The situation at present is that far too much material is non-recyclable, or is at the economic margins of being recyclable, resulting in sudden market shocks when economic situations change.

The below illustration represents a true circular economy. In our view recycling should be as local as *economies of scale* allow and should be tailored to local design and manufacturing needs.



A fundamental component of the Circular Economy, is the transition from “waste” to “product” or “raw material”. It is our experience that the EPA is not functioning correctly in its “End of Waste” function. Decision making on EoW and By-Products is taking too long with insufficient engagement with Industry and a lack of coherent and consistent guidance for Industry from the EPA.

We call for a replacement of the EPA's national waste prevention programme with a new multi-agency circular economy unit that works with collectors, the NSAI, designers, manufacturers and major retailers to ensure that products are ready for recycling at end of life, and that new products incorporate resources that are recycled from resources recovered from waste. We believe that there is a real and significant economic opportunity for Ireland to become a global leader in this space.

We have experienced a significant reluctance on the part of the EPA to engage positively with the Collectors, such as Panda, with regards to End of Waste and the

Circular Economy. Quite simply, our experience, knowledge and available tonnage does not seem to be viewed as a resource by the EPA.

We note that the EPA's website lists the main functions of the Office of Environmental Sustainability under the headings of Climate Change, Circular economy and Environmental Licensing. Under each of these functions is a subset of further functions. Despite End of Waste being an essential component of the Circular economy, the EPA have End of Waste decisions listed as a subset of Environmental Licensing and not the Circular Economy. To separate End of Waste from the Circular Economy is illogical, and in our view is illustrative of a significant disconnect.

Collectors/Processors have evolved significantly from the simple model which existed in the '00s; collect at the doorstep and dump in the landfill. This evolution is taking place solely in response to market changes, without support or involvement from agencies such as the EPA, Enterprise Ireland and Solas.

The new multi-agency group should include the NSAI and state training agencies to ensure that the outputs from Collectors meet with quality standards, and that the Collectors are equipped with adequate skills to continue the evolution from simple collection and disposal merchants to manufacturers of resources and fuels.

As significant stakeholders we are eager to engage with NESC, Solas, Enterprise Ireland, the EPA, DCCA and other bodies towards the promotion of Ireland as a global leader in the circular economy.

## 7.7 Circular Economy Consultation Questions

### **Q1. What are the areas with greatest potential for transformation in Ireland under the Circular Economy?**

The recycling of C&D derived aggregates in the built environment is an area where we must catch up quickly with our EU neighbours. Following best practice, as set out in LEED and BREEAM, with regard to recycling C&D rubble and inclusion of minimum recycled content in new buildings is essential as Ireland strives to keep pace with demand for housing.

It is wholly unsustainable to transport and dump materials which should be used as recycled aggregates, whilst simultaneously blasting virgin aggregates out of the ground.

There are significant capacity constraints with regard to the disposal of C&D waste, whilst at the same time there is prolific use of mined aggregates in applications such as road construction, where C&D derived aggregates would be perfectly acceptable.

### **Q2. What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors?**

Presently there are too many stakeholders working separately on individual aspects of the circular economy, with little cross over or common understanding of the broader problem. There are also stakeholders working against the circular economy. This can be seen in the area of C&D waste, where aggregate manufacturers stand to benefit from selling extracted resources and again benefit when C&D waste, which should be recycled, is used to backfill the quarry.

There is a role for DCCAE to link the key stakeholders, (producers, designers, waste collectors, standards agencies, regulators etc.) towards the goal of driving the circular economy.

A circular economy office may be required to combat the issues of high levels of extraction and low levels of end use processing and cycling of resources. The CE office could also be tasked with communicating key circular economy messages.

**Q3. What might be a meaningful national waste reduction target and how could it be achieved?**

We would again suggest that targets should be based on resource consumption reduction, rather than waste reduction.

**Q4. 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?**

Waste management practices are not nearly as important as other measures in driving the circular economy.

## 8.6 Other Policy Options and Measures for Awareness & Education

- . The waste industry will be required to play a greater role in engaging with their customers to drive better prevention and recycling behaviours.
- . Targets to be developed to reduce the contamination levels in specific bins which will inform future awareness campaigns.

## 8.7 Consultation Questions – Citizen Engagement

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

Advertising is continually required. We suggest that a consistent and prolonged media campaign is needed to fully inform citizens of their obligations and their options with respect to waste management. This should be linked to climate change and plastic pollution, both of which are currently high on the agenda of most citizens. Citizens should be exposed to consistent messages about recycling and waste prevention in work, at home and when they are out and about.

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

The waste collectors have obligations in their waste permits to inform their customers about segregation of wastes and the proper use of the various bins. That is where their resources should be spent.

The wider campaign should be funded by Government using the Environmental Fund, which should be bolstered by new levies that are currently under consideration and largely supported by the IWMA.

EPR puts an onus on manufacturers to contribute to recycling and waste prevention. We suggest that their resources should be focussed on product design and on simple relevant labelling that makes it easy for the citizens to segregate waste correctly.

### **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 in the interest of Beauparc that customers properly use a 3-bin system. We certainly communicate regularly with customers in this regard. The roll out of the Camera Detection System has been particularly effective in this regard.

The IWMA and REPAK funded an initiative last year to print and deliver bin hangers to all household customers with information on what materials to place in the MDR bin.

The IWMA will continue to encourage and support additional communications with customers that can improve recycling and waste prevention performance.

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

Stickers are wasteful, expensive, time consuming and prone to cause increased confusion if listed items change after a sticker has been put in place.

It may be possible for waste collectors to deliver stickers to houses for the customer to apply themselves to the bins. However, there is a risk that the customers with the least interest in their waste will just bin the stickers and these are the customers that need to be convinced to change their habits. If good incentives and/or penalties can be applied, customers will take more interest in source segregation of wastes and can easily find the information that they need on several websites, such as Mywaste.ie, iwma.ie or their collector's website.

We have a preference for bin hangers.

## 9.0 Construction and Demolition Waste

### 9.7 Consultation Questions – C&D Waste

#### ***What other measures need to be put in place to encourage all players to prevent and recycle waste from construction?***

The overall aim of any future policy on C&D waste and the circular economy should be to provide measures that preserve finite aggregate reserves through the sensible re-use of appropriately treated C&D waste as building materials. These measures are already in common use across Europe. Such measures will have a triple benefit: Reducing consumption of resources, reducing transport and reducing the need for disposal of C&D waste.

Beauparc companies have developed processes for sorting co-mingled C&D waste. However, source segregation is important and should be mandated on building sites. Waste management plans required by local authorities as part of the planning process should be enforced.

Pay by weight should be mandatory for waste collected from C&D sites in order to provide greater encouragement for waste prevention and recycling.

#### ***What existing measures are in place that could be improved?***

As stated above, waste management plans are required by planning for new developments. Scrutiny and enforcement of these plans is required. During a planning application the costs associated with demolition and disposal of construction wastes should be assessed and routes for disposal, recovery or re-use identified.



***What incentives could be introduced to increase the use of recycled materials?***

The application of mandatory requirements for minimum recycled content should be applied.

***Should levies be applied to the use of virgin material where a recycled material is available as an alternative?***

It is the view of Beuparc that nothing other than minimum recycling contents will drive the use of recycled materials. This will require changing of aggregate standards and education of specifiers in line with LEED and BREEAM best practice.

While a levy may be attractive, care should be taken to avoid a scenario that allows a levy to become a simple “pass through” charge from the developer/builder to the consumer, with little take up of recycled material and a consequential rise in building cost inflation. To avoid this, an investment in the development of building standards to accommodate recycled material is required.

***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?***

Pay by weight and enforcement of waste management plans is required.

***What are the best approaches to raising awareness and education?***

No further comment

***What are the barriers/enablers to these measures?***

No further comment

***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?***

Yes, there is an urgent need for the development of material standards for aggregates produced from recycled C&D material, the NSAI needs to lead on this with strong participation from the Collectors.

Also, introduction of a pay by weight system for mixed skips. Introduction of minimum recycled content in building materials.



## 10 Textiles – Waste and Recycling

### 10.5 Short Term Measures 2020 for Textiles

Beauparc is of the view that textiles should not be banned from the general waste bin, as there is insufficient alternative methods to deal with textile wastes.

We also have a significant concern that if textiles are banned from the Residual bin, enforcement officers would target Collectors and not the Householders, despite the fact that the Collectors have very little ability to control what materials are placed in the residual bin, and even Contamination Detection Systems cannot detect the materials that are placed in bags in bins. Often textiles are placed in bins as they have been soiled to an extent that they are unrecyclable. The responsibility for policing a textile ban cannot be placed on Collectors.

Beauparc reiterates its view that significantly more emphasis needs to be placed on producers and retailers with regards to textiles. Producer responsibility is essential.

#### ***What measures would best support the successful collection of household textiles?***

Additional bring banks are required.

We also recommend an investigation into 'door-to-door' textile collections with appropriate enforcement, if necessary. There are legitimate charities collecting textiles from householders and also some bogus collectors masquerading as charities. Citizens are generally unsure of the legitimacy of such collectors and are nervous that their textiles could be collected by criminals, masquerading as charities. This is compounded when textiles are left at the kerbside in labelled bags for legitimate charities to collect and they are collected by another party in an unmarked van.

We also recommend that clothes retailers should be obliged to accept old clothes for recycling at their stores.

Beauparc reiterates its view that significantly more emphasis needs to be placed on producers and retailers with regard to textiles. Producer responsibility is essential.

#### ***What measures would best support sustainable consumption of textiles by the general public?***

An information campaign, targeted at users of fast fashion, highlighting the problem 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?***

As stated above, we have serious concerns in relation to the proposal to 'Ban textiles from the general waste bin, landfill and incineration.'

Householders generally put their residual waste in black plastic bags, tie them and then place them in the residual waste bins. Waste collectors do not know what is in those bags in those bins, yet they could be held responsible for any textiles found upon inspection by an enforcement officer and could be prosecuted. That would be very unfair and would criminalise all waste collectors. If a textile is grossly contaminated with oils, bleach or other waste, is it still banned from household waste?

We suggest that education, awareness, encouragement, incentives, along with making it easier for citizens to recycle textiles by developing a higher density of bring banks and better regulating door-to-door collections, would be a more appropriate response to this issue.

## 11.0 Waste Management Infrastructure

### 11.7 Consultation Questions – Waste Management Infrastructure

***Should one national waste management plan be produced in place of the 3 current plans?***

We recognise and welcome the progression from 10 regional plans to just 3 and we also welcome the consistency in the 3 plans, which gives us a national plan in all but name. We do not see any immediate need to change the current system.

The 3 regional plans if not replaced by a national plan should not create artificial boundaries with respect to waste management, for example, if a waste originates in a county within a region, it should not be prevented from travelling to an adjoining county, outside the region, if it makes economic/environmental sense to do so.

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

We do not understand what is meant by this or the implications of this suggested change.

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

Our general view is that greatest value to the exchequer and the environment arises when the State confines itself to the provision of clear policy direction, legislation, enforcement and fiscal incentives/levies to drive private innovation in the circular economy space. The private sector has provided transfer stations, Materials Recovery Facilities (MRFs), composting plants, anaerobic

digestion plants, Waste to Energy (WtE) plants and landfills. There is no requirement for the State to assist with the development of additional facilities of that nature.

However, given the extreme volatility of international recycling markets, the difficulties with economies of scale, and the embryonic nature of the circular economy, we could see an expanded role for the State in relation to the provision of some recycling facilities so as to provide lasting circular economy infrastructure and avoid significant market volatility

Assistance could be provided for through the following measures:-

- Provision of more sites for bring banks;
- Development of more Civic Amenity (CA) sites; and
- Provision and support of the development of indigenous recycling infrastructure which would seek to provide long-term stable outlets for recycle, and therefore support the circular economy. This is particularly needed to provide outlets for materials currently traded into far overseas markets and highly volatile markets.
- Government could support the development of a paper mill/pulper in Ireland as there are none currently in the country, and the international market for recycled paper is very volatile and problematic. Mixed soft paper collected in the MDR bins in Ireland is a product that is at the mercy of international markets. The future of MDR recycling in Ireland could depend on controlling our own destiny in that regard.

As stated throughout this response, given the EU's Circular Economy Package, we see a significant opportunity for the State to become a centre of excellence for the Circular economy.

The funding of State interventions should come from the Environment Fund and a Climate Action Fund, which we expect to be established if the Irish Government is serious about tackling Climate Change. Those Funds should be boosted by appropriate levies that are targeted to change consumer and producer behaviour in favour of the Environment and Climate Action.

***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 are concerned about the following proposal in the consultation document:

*“Legislation to strengthen the powers of the regulatory authorities to ensure that collectors have contingent capacity in place and that waste can be directed by the regulatory authorities to be introduced.”*

Beauparc, as part of IWMA, is strongly opposed to the State directing waste to facilities and any legislation that would give that power to the State would have a devastating impact on investment in waste management infrastructure. Investors need to be confident that facilities can compete fairly in the marketplace and are wary of any legislation that would undermine the free flow of waste to privately owned recycling and recovery facilities. Directing waste to a higher tier in the waste management hierarchy has been accepted by the IWMA in the past but directing waste to particular facilities has been successfully challenged and we will continue to oppose such a move in the future.

We welcome the concept of providing contingent capacity to cover issues that arise from time to time. However, it is not practical for transfer stations or most other infrastructure to provide that capacity without reducing the effectiveness and the viability of that infrastructure. Therefore, we recommend that emergency measures should be put in place and be easy to implement quickly in the event of a serious issue. The existing operational landfills are best placed to take additional waste in the event of a short-term emergency and that option should be fully explored.

We would also welcome emergency powers that would allow the short-term storage of dry recyclables such as paper or plastic in sheds when there is a serious problem with outlets for those materials. The sheds could be leased short term and would not have authorisations other than that applied by the emergency powers, in full consultation with the relevant authority (DCCAE, EPA, etc).

We welcome the following proposal:

*“Legislation and procedures regulating the development of waste infrastructure to be examined to see if processes and timelines can be streamlined.”*

The processing of applications by the EPA is far too slow and is a hindrance to the provision of necessary waste management infrastructure. This has been the case for many years and rarely improves. The EPA needs to urgently address this situation, as business must be able to adapt to rapidly changing market conditions.

We suggest that the legislation surrounding Strategic Infrastructure Developments (SID) should be reviewed and revised. The 6-month timeline for processing a SID application by An Bord Pleanála is meaningless when the Board does not have to accept an application until it is ready. There is no time

limits on the pre-application process and we can see that this is used by the Board to buy time.

Also, the threshold for waste facilities under the Strategic Infrastructure Act is too low and should be reconsidered. A 100,000 t/a waste facility is relatively modest in the current context, and we are aware of several facilities that have been designed to be less than the threshold to avoid the Strategic Infrastructure process. That is a poor indictment of a process that was designed to fast-track and streamline the development of strategically important infrastructure. We suggest that the applicant should have the option of going down the standard planning route with their local authority, regardless of the size of the development.

We also recommend that there should be an option to engage in SID for changes to facilities that are above the SID threshold, but are operating with an historical planning permission that was achieved through the conventional planning system, prior to the introduction of the SID process.

## 12.0 By-Products

### 12.7 Consultation Questions – By-Products

#### ***How do you think the By-product process could be improved?***

We would welcome a more timely response from the EPA in considering Article 27 By-product decisions. The 10-week standstill period advised in the new guidance for soil and stone declarations is too long in our view.

Also, as it is only advisory to wait for the EPA decision, we are concerned that large volumes of material will be moved without waiting 10 weeks, and we may end up with large scale unauthorised dumping if the EPA decides that such material is waste and not a by-product. We are also concerned that by the time a decision is made by the EPA with regard to whether a material is waste or a by-product, the party, or parties, responsible for the material may be untraceable, wound up or in liquidation.

We are concerned that the EPA appears unable to promptly reject poor quality Article 27 applications. Such a situation could be exploited by unscrupulous hauliers. This situation may need to be remedied through a change in legislation.

#### ***Do you support the introduction of fees to assess by-product notifications?***

Yes, provided the fees are reasonable and proportionate and the fees lead to more efficient decision making.

***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?***

Please refer to Section 7.0, above, for our views in this regard. In particular we see a need for the EPA to align its activities with regard to End of Waste and By-Products with its activities in the Circular Economy, as it is our view that the End of Waste is indivisible from the Circular Economy.

## 13.0 End of Waste

### 13.5 Other Policy Options and Measures for End of Waste

There is a statement that legislation is to be updated to:

*Give local authorities a role in terms of assessing End of Waste applications from facilities authorised by the local authority.*

We have a concern that this will lead to variance with regard to decisions between local authorities and significant variance between local authority permitted sites and EPA licensed facilities. We also have a concern that local authorities may not have adequately trained and experienced personnel to make determinations on environmental risk.

We welcome the suggestion that the EPA prepare a standard application form for End of Waste applications and have the capability to reject substandard applications. As this is a new area and it is unlikely that there will be a “one size fits all solution” for EoW applications, we feel that there should be more scope for the EPA to engage actively with the EoW applicant.

We also welcome the proposal that the State encourages future End of Waste applications on priority waste streams to facilitate the recycling of waste.

### 13.6 Consultation Questions – End of Waste

***Should the Government seek to establish a group to apply for national End of Waste decisions for appropriate products e.g. Aggregates, Incinerator Bottom Ash?***

In principle yes, however we are extremely concerned that any such move would undermine existing applications, on the part of private industry, to achieve End of Waste declarations. As of January 2020 there have been four operator specific End of Waste decisions and Beuparc currently has two additional End of Waste applications awaiting decision from the EPA and another four in active development, all of which are scheduled to be submitted

to the EPA shortly. Any move towards National EoW decisions may result in the EPA de-prioritising operator led EoW decisions. The private sector, through innovation, has led the way with EoW applications, any development of National applications should not result in the EPA de-prioritising individual applications.

***If yes, what expertise would be necessary for such a team?***

A group of experts with a combined understanding of waste processing, waste legislation, environmental science and product standards/specifications.

***Who should be represented?***

As standards are a key issue with the certification of End of Waste, a steering group could comprise the NSAI, DCCA, EPA, Local Authority personnel and the waste industry (IWMA). However, the work involved requires a dedicated team of experts, such as waste collectors and consultants.

***Are there other materials which you believe are suitable for national end of waste decisions?***

We are not aware of any materials currently.

***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 refer to our previous comments with regard to the circular economy.

## 14.0 Exemptions

### 14.5 Consultation Questions- Exemptions

***Are there particular waste streams which you think might be suitable to the 'exemption' approach described above, for example, the on-site controlled incineration or deep burial of Invasive Alien Plant Species? Which other waste streams could or should be considered in the context of an 'exemption' approach?***

The existing Certificate of Registration process effectively exempts some small-scale waste management activities from the requirement for a permit or a licence. Consideration could be given to further use of the registration system as an alternative to exemptions.

***In your opinion, what are the dangers/risks or advantages associated with an 'exemption' approach?***

There should be an opportunity for stakeholders, such as the IWMA, to comment on any specific proposed exemptions in advance of their implementation. We have no objection to on-site treatment of Invasive Alien Plant Species, but could object to other exemptions if we considered that the materials should be managed as waste.

***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 further comments.

## 15.0 Extended Producer Responsibility (EPR)

It is our strongly held view that in order to facilitate a functioning circular economy, far more needs to be done on the DESIGN and MANUFACTURE elements of the model illustrated in figure 2. Products sold to consumers must be "Designed and Made for the Circular Economy" and not made for disposal.

In order for the circular economy to function, the materials we collect must be recyclable and there must be a market for recycle. The current situation is that far too much of the material we collect cannot be economically recycled, irrespective of our desire to do so. We cannot state strongly enough that the imposition of recycling targets on collectors is pointless, without addressing product design and manufacture. This is not us seeking to shirk our responsibilities, it is a simple statement of chemical, physical and economic reality.

In our view, the overriding priority is in the area of producer responsibility and to bring the Polluter Pays Principle back to the manufacturers. A secondary priority is to address the gross inefficiencies in end of waste certification. The final piece of the circular economy jigsaw is the creation of links between collectors/recyclers, standards bodies and colleges in order to ensure that recyclers are producing raw materials that are fit for use by manufacturers.

***How is the new EPR infrastructure going to impact on Ireland's existing EPR structures?***

Any policy measure that extends a producer's responsibility to post consumer stages of a product's lifecycle must be welcomed. EPR is the Polluter Pays Principle in Action.



***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?***

We have no comment to make in this regard.

***How do EPRs help Ireland achieve our targets?***

By applying the polluter pays principle.

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

Through application of EPRs, application of the polluter pays principle, the creation of a packaging forum as called for in 2018 by Beuparc and implementation of many of the measures set out in Section 5.5 above.

By implementing a system of labelling as mentioned earlier in this submission and then introducing levies that hit materials that cannot be recycled easily within the system available in Ireland. We suggest that recyclable items should have a message that says 'place in dry recycling bin' or 'place in food waste bin' or 'place in bottle bank', etc. Non-recyclable items should have a message that says 'place in general waste bin'.

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

Using existing EPR infrastructure, modulated fees should be introduced based on a fair pricing of the external environmental costs associated with the collection and recycling of products and materials. Where products and materials are easily recycled locally, a low fee should apply. However, where materials are non-recyclable, known to be highly carbon intensive, or only recyclable in far overseas locations, a higher fee should apply. There is scope for a part of this high fee to be used to subsidise the planting of forestry as a carbon mitigation measure.

***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?***

Textiles

***Is there a role for voluntary agreements with industry?***

Possibly, but we feel that this is likely to result in a 'de minimus' approach from producers.

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

The introduction of labelling and levies as mentioned above and earlier in this submission would draw attention to materials that are not accepted for recycling in Ireland. This should result in discussions between the producers, the

retailers and the waste industry on the development of alternative recyclable products. Please see our 2018 submission to REPAK in this regard (Section 5.5. above).

**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. This could be applied to a wide range of retail outlets. For example:

- Clothes shops could be obliged to accept old clothes for recycling and could donate those clothes to reputable charities. This should not be a financial burden.
- The retailers of gas cylinders should be obliged to take back empty cylinders (some do, but many do not, including industrial gas cylinders/aerosols)
- Coffee shops could be obliged to accept single-use tea and coffee cups for recycling or composting, regardless of the origin of the tea or coffee cups.
- Petrol stations and garages could be obliged to accept waste oil for recycling.

Care would have to be taken to ensure that the burden is shared with on-line retailers.

**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?**

Please see previous statements in this response.

## 16.0 Waste Enforcement

### 16.5 Consultation Questions - Waste Enforcement

What, in your view, are the factors leading to waste crime (please tick one box)

Ineffective enforcement by the authorities

✓

Ineffective penalties

Waste Market Factors

Lack of awareness

Other (please specify)

There are a number of important factors, such as; Access to waste outlets, Education, Enforcement, Penalties etc.

One issue that is of concern is waste services provision to rented accommodation, particularly in short-term letting.

There is a significant amount of non-payment of waste collection charges in rented accommodation and multi occupancy accommodation. It is the view of Beuparc that Landlords should be responsible for unpaid waste collection charges in the same way as Landlords are responsible for Local Property Tax.

We echo the IWMA call for the establishment of an Environmental Crime Unit.

***What contribution to the cost of the enforcement system should the waste industry make?***

As member of the IWMA we are open to discussions on part-financing the enforcement of households that do not avail of a waste collection service and those that have a service but still mismanage their waste by not using the system correctly, e.g. not using brown bins or contaminating MDR bins.

In terms of enforcement of criminal activity, the waste industry has to compete against criminals that engage in unauthorised waste activities and is entitled to the support of the State to apprehend and prosecute such criminals.

Any charges levied on the waste industry to address this issue would have to be passed on to customers, which is not a progressive form of taxation, as those that manage their waste in a responsible manner would be asked to pay for those that do not.

The State is responsible for law and order and cannot credibly pass that responsibility to legitimate businesses that are providing essential services to the public.

New environmental and climate change levies could be used to support enforcement activities and would be much more progressive in terms of changing the behaviour of citizens. Also, higher fines for illegal dumping and court decisions requiring guilty parties to cover the State's costs in the legal action would help to reduce the State's burden.

***Should financial provision be a requirement for permitted waste facilities?***

Financial provision should be consistent with licensed facilities, so there should be collaboration between the EPA and the local authorities in this regard and a fair and consistent system applied.

***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?***

Transparency is very helpful in terms of identifying criminal activity in the waste sector. Legislation should be introduced that ensures that all waste facility annual environmental reports are available to view on-line. More eyes on waste reports will help to identify the false data that hides criminal activities.

## 17.5 Short Term Measures 2020 for Waste Data and waste Flows

The NWCPO will examine the feasibility of setting up a system to track C&D waste flows from generation to final management, i.e. a reporting system which tracks the flow of C&D waste from the site on which it arises, the collector/hauler who collects it and its final treatment destination.

**Beauparc supports this measure.**

## 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?***

An annual data set is probably as much detail as is needed. Quarterly reporting would be too onerous and of little value. Data reporting burdens should be equally applied to licensed and permitted facilities and equally transparent.

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

The provision of an online system and format that is workable and can upload quickly is the key area here. The current system is very cumbersome and can take a full day to upload.

As member of IWMA we refer DCCAE to the IWMA submission to NWCPO in June 2018.

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

In common with the IWMA Beuparc considers that annual data is ideal. EU reporting is every second year (biennial), which we consider too infrequent and the NWCPO now requires quarterly reporting for kerbside household waste collection data, which we consider to be overly onerous and a burden on business.

***Do you believe that all waste should and could be tracked from site of creation to final destination?***

As it stands there is a disparity between what EPA licensed sites and Local Authority permitted sites have to report on. There needs to be work on levelling this playing pitch.

***Are there confidentiality or other issues for industry in reporting on waste flows?***

Yes, but this must be balanced against the greater good in combatting illegal waste activities. Citizens and businesses need to be able to see where waste companies send waste to make informed decisions on which company to engage for their waste management needs.

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

Firstly, there should be stronger enforcement of waste companies that do not make annual returns, as required by law.

Secondly, there should be better engagement between the various authorities to seek data in a consistent format. The NWCPO appears best placed to advance that goal.

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

We can better understand progress to targets and focus resources where they are needed most. Annual data is adequate to achieve this.

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

Strong penalties, including prosecutions. Closure of facilities could be considered for repeat/persistent offenders.

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

We have no comment on this issue.

## 18.0 Research and Innovation

### 18.6 Consultation Questions - Research & Innovation

As stated in detail in Section 7.0 above, Collectors/Processors have evolved significantly from the simple model which existed in the '00s; collect at the doorstep and dump in the landfill. This evolution is taking place solely in response to market changes, without support or involvement from agencies such as the EPA, Enterprise Ireland and Solas.

We believe that there is a significant opportunity for Ireland to become a leader in the circular economy, through the development of expertise in recovering resources for the circular economy.

Currently there is no state agency tasked with improvement of the service sector. A circular economy office, should be tasked with linking the NSAI and state training agencies to ensure that the outputs from Collectors meet with quality standards for products. There is also need for an Agency to assist Collectors in attaining adequate skills to continue the evolution from simple collection and disposal companies to manufacturers of resources and fuels.

As significant stakeholders we are eager to engage with NESC, Solas, Enterprise Ireland, the EPA, DCCAE and other bodies towards the promotion of Ireland as a global leader in the circular economy.

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

As stated throughout our response, Beuparc is firmly of the view that much greater emphasis must be put on the design and manufacturing for the circular economy. Currently MRFs produce large volumes of single stream materials which are exported for recycling overseas.

Research programmes need to be instigated which target the materials being processed for export and methods to bring this material into reuse in Ireland, or at least elsewhere in the EU.

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

There are a number of areas to be targeted:-

1. What circular economy compatible food packaging will look like?

2. How much recycle can be included in plastic packaging before the material becomes unsuitable?
3. What materials are best for the circular economy, when whole life cycle is taken into account?

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

The Collectors as part of the Service Sector, currently sit outside the normal R&D mechanisms. They are not part of Enterprise Ireland or IDA funded initiatives.

There needs to be far more research and development targeted around materials managed by the Collectors.

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

Yes. A portion of research has to be focused at DESIGN, MANUFACTURE and END OF WASTE stages of the circular economy.

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

A reconfiguration of the EPA's Greener Production 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?***

Beauparc is happy to engage further with DCCAE in this regard.

## 19. Consumer Protection & Market Monitoring

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

#### **Beauparc Response**

The *IWMA Critique of the CCPC Report on 'The Operation of the Household Waste Collection Market'*, published on the 28<sup>th</sup> of September 2018 is attached in Appendix 1, as the Beauparc response to this Section of the Consultation Document.

It is a fact that there is a significant difference in the cost of providing a waste collection service in Urban and Rural areas. The difference is based on the fact that a truck serving an urban area can collect waste from 1000 bins per day, whereas a truck serving a rural area is likely to collect from only 300 bins per day. The additional cost of service provision in rural areas is passed directly onto rural customers.

We believe that the cost of service provision, based on the *polluter pays principle*, should be passed to the customer, and there should be no subsidisation of rural customers by urban dwellers. However, it is our view that publication of figures showing a cost differential between urban and rural residents is likely to lead to significant complaint.

***The CCPC recommended the establishment of an economic regulator for household waste collection.***

***In your opinion, should an economic regulator be established? In considering your reply it is recommended you consider the detailed rationale set out in the CCPC report, available here.***

***If a regulator was to be introduced what powers should the office have? Should they be confined to economic powers?***

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

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

We do not believe that an economic regulator is needed. Many of the consumer protection issues that were raised in the 2018 CCPC report on the 'Operation of the Household Waste Collection Market in Ireland' have now been incorporated into waste collection permits by the NWCPO, with the support of the IWMA. Any other issues of concern in that regard could be managed by the NWCPO, as the effective regulator of all waste collection in Ireland. The NWCPO works closely with the WERLAs and the wider enforcement network, so the enforcement tools are in place to implement any measures that are required for the purpose of consumer protection.

The IWMA reviewed the CCPC Report and found it to be biased and seriously flawed. Our critique of the CCPC report is attached to this submission.

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

The IWMA does not engage with members on issues of pricing other than to advise that all pricing must incentivise waste prevention and recycling. We suggest that the NWCPO should work with the enforcement authorities to analyse pricing structures to ensure that waste prevention and recycling is incentivised. That analysis should not be limited to just kerbside household waste collection but should be a broad rule across the sector.

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



Yes, very useful.

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

Yes, as it provides confidence that prices are responding to competition and are not constantly increasing, as is the case in other utilities.

***Would you support the Group undertaking whole of market monitoring including publishing prices for household waste collection for all collectors in all areas?***

No. Firstly, the PMG work shows that there are a wide variety of ways in which householders are charged in an incentivised manner for kerbside waste collection, so comparisons between companies' prices are not easily made. In fact, many companies offer a number of different price plans that are designed to be attractive to a range of different sized households, which makes it even more complicated for price comparisons.

Household waste collectors are obliged to charge in a manner that incentivises waste prevention and recycling. The PMG ensures that prices are fair and not escalating. These are the two most important factors.

Publishing all prices is likely to turn kerbside household waste collection into a popularity contest. The problem with that is that fixed charges are popular with the public but not good for the environment. Any such move would put undue pressure on collectors to reduce the variable charging to a minimum and to maximise the fixed element of the charge.

There is a clear conflict in waste collection between maximum competitive forces and maximum environmental performance. We suggest that waste collection needs to move towards maximum environmental performance, whilst maintaining fair prices, as observed by the PMG. Otherwise, we have no chance of meeting future EU targets.

So long as prices are demonstrated to be fair, reasonable and not escalating, there is no need for the State to focus on the introduction of measures that are designed to encourage people to switch service provider, just because that is a theoretical measure of competitive forces in a market. The real measure of competition is provided by the PMG reports on the market and those reports have not suggested that there is a need for further interventions at this time.

***Do you believe there needs to be further oversight of the waste sector from a consumer rights perspective?***

No, but the IWMA would not object to an ombudsman or other body that would handle consumer complaints relating to the waste sector. It would make sense for such a body to be attached to the NWCPO.

***Do you believe that a consumer complaints body should be put in place?***

No.

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

If such a body was put in place, it should be attached to the NWCPO and its powers could include reviews and revocations of waste collection permits, as well as fixed penalty notices for breaches of certain conditions of the waste collection permits.

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

The NWCPO, for the reasons given above.

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

Recent changes to the waste collection permits have introduced new regulation from a consumer perspective, with the support of the IWMA. The IWMA is open to any further discussions of that nature.

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

No comment.

## 20.0 Green Public Procurement

Beauparc has no comments to make on Green Public Procurement.

## 21.0 Household Bulky Waste

### 21.1 Consultation Questions - Household Bulky Waste

***What supports do consumers require to prevent bulky waste?***

There needs to be easy options for householders to bring bulky waste to reuse/civic amenity centres. The higher the density of such centres the easier it will be for consumers.

***Are consumers willing to pay more to ensure appropriate end-of-life disposal for these products?***

The polluter pays principle must be adhered to. There is an onus on retailers and manufacturers to ensure that the full life cycle costs are integrated into the price paid for by consumers. Care must be taken to ensure that a level playing pitch in terms of pricing is applied to both physical and on-line retail.

***Should Government support investment in the recycling of large plastic items that are not suitable for domestic recyclate collection?***

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?***

No further comments.

## Key Messages in Response to Consultation Document

As a business, our focus is on finding sustainable outlets for the materials we collect. However, it must be understood by policy makers that we are required to manage all of the materials we collect from our customers, irrespective of whether they are recyclable. We have little control over what wastes our customers generate.

It is our strongly held view that in order to facilitate a functioning circular economy, far more needs to be done on the DESIGN and MANUFACTURE elements of the model illustrated in figure 2, above. Products sold to consumers must be “Designed and Made for the Circular Economy” and not made for disposal.

In order for the circular economy to function, the materials we collect must be recyclable and there must be a market for recycle. The current situation is that far too much of the material we collect cannot be economically recycled, irrespective of our desire to do so. We cannot state strongly enough that the imposition of recycling targets on collectors is pointless, without addressing product design and manufacture. This is not us seeking to shirk our responsibilities, it is a simple statement of chemical, physical and economic reality.

In our view, the overriding priority is in the area of producer responsibility and to bring the *Polluter Pays Principle* back to the manufacturers. A secondary priority is to address the gross inefficiencies in end of waste certification. The final piece of the circular economy jigsaw is the creation of links between collectors/recyclers, standards bodies, designers and colleges in order to ensure that recyclers are producing raw materials that are fit for use by manufacturers.

Beuparc is of the view that the attainment of recycling targets of up to 65% will be impossible to achieve without significant work being done on producer responsibility, pricing/regulating non-recyclable materials out of the market, eco-design and the use of circular economy measures in manufacturing.

As an interim measure, the classification of the manufacture of high quality Solid Recovered Fuel (SRF) as End of Waste (EoW) and therefore recycling, could be highly beneficial. This measure would allow for easy achievement of the 65% recycling target. EoW could be applied where highly refined SRF is used in Ireland as a transition fuel to replace imported fossil fuels in applications such as peat and coal fired power stations.

It is our view that a specific circular economy office may be required to form a link between Enterprise Ireland, Repak, Colleges, Manufacturers, Regulators, Standards Bodies and Collectors, with the ultimate role of moving materials away from disposal and into the circular economy.



# Appendix 1 IWMA Critique of the CCPC Report on 'The Operation of the Household Waste Collection Market'

# Appendix 2 Beauparc Submission on Environment Fund Levies 2019.