

Our file Ref: WW75 – LT01

Your file ref: *Waste Action Plan Consultation*

Dated: 21st February 2020

**Waste Action Plan Consultation,
Waste Policy & Resource Efficiency,
Department of Communications, Climate Action &
Environment (DCCA),
Newtown Road,
Wexford,
Y35 AP90.**

Re: Waste Action Plan Consultation

Dear Sir, Madam,

Boylan Engineering & Environmental Ltd. (Boylan Engineering) are a consultancy providing a broad range of services and integrated solutions to the construction, environmental and waste industry in the Midlands, greater Dublin area and Border county regions.

As such, Boylan Engineering are acutely aware of the need to develop the circular economy and the requirement for progressive policy in this area to support stakeholders to make necessary adjustments to help meet national sustainability targets.

Boylan Engineering welcome the feedback opportunity presented through open consultation on:

- On the Transposition of the Circular Economy Waste Legislative Package
- Waste Action Plan for a Circular Economy

Noted the consultation period is closed (December 2019) for the below, but where there is overlap with above, comments will be made:

- On the Proposed Introduction of New Environmental Levies

Boylan Engineering has asked for feedback from Clients to support this submission. As per the foreword where respondents are not required to answer all questions or sections, Boylan Engineering have opted to address general issues of concern only.

Boylan Engineering are open to further converse on the points below at the request of DCCA.

Yours Sincerely,



Fintan Coyle
Boylan Engineering & Environmental Ltd.

cc Cathal Boylan (Director)



Comments on Waste Action Plan Consultation

Greening the Economy

The European Green Deal is a vision for a climate neutral Europe by 2050. It is a holistic approach to transition to a sustainable secure and healthy planet over the next 30 years. The Policy recognises that achieving a climate neutral and circular economy requires the full mobilisation of industry.

The Circular Economy Waste Action Plan provides an opportunity for Ireland to incorporate appropriate policy measures to mobilise industry to invest in best available techniques, people and take control of the resource loop consistent with the hierarchy of materials management.

The Department should use policy instruments available to encourage investment in the circular economy through a hierarchy of incentivising life cycle thinking, segregation, preparation for reuse and the ability to reuse, recycle and recover materials in this country. Circular economy is vital to decouple growth from resource use. Circular Economy policy presents an opportunity to develop indigenous recycling facilities to recycle waste in the State and capture resource potential, where possible. Also reduces the carbon footprint associated with export of materials.

Taxation should be progressively introduced so an environmental tax on the production of materials can be rebated back when materials are segregated for recovery. Alongside this, a materials tax could be considered to reduce the production of virgin raw materials where secondary materials are available through implementation of the circular economy. Such taxes could be maintained as manufacturers progressively increase the amount of recovered, reused or recycled material they use.

Investment is led by policy, for example investment in development of the secondary aggregate market will be led by appropriate taxation models as above. Similar schemes were developed in the UK with the introduction of the Aggregates Levy Scheme.

The loss of traditional industries associated with fossil fuel production, notably peat harvesting for Ireland has left many communities insecure about the future. A key plank of the European Green Deal is ensuring that nobody is left behind. Encouraging Ireland to develop circular economy at all stages will create employment opportunities, having appropriately trained and able workforce is a key requirement for investment for the future and an area where public investment could help mobilise industry.

Life Cycle Thinking

Life Cycle Thinking that goes beyond the traditional focus on production site and manufacturing processes to include environmental, social and economic impacts of a product over its entire life cycle is an important consideration for advisory groups. In order to maximise potential requires engagement from stakeholders at all levels from design, marketing, retail, consumption, separation, collection, reuse / recycle / recovery. Each stakeholder demanding higher standards from each other. Advisory Group on a Waste Action Plan for a Circular Economy shall ensure that all stakeholders are adequately represented and input on the advancement of plans.



Separation

Civic amenity centres can provide a cleaner method for separation and segregation of wastes than available in the 3 x bin system. However, such facilities should be available at private material recovery facilities where possible also. The cleaner the separation, the greater options available for resource management.

Appropriate labelling of items will help consumers to understand how and where to divert waste streams.

Businesses should be incentivised to increase the streams of waste segregated at source.

Plastic

Plastic is an excellent product and provides many important functions including protection of vulnerable products, preservation of products for longer, prevention of waste materials, allows transport over great distances more efficiently, and allows for relay of information.

However, plastic has the potential to be problematic, well encapsulated in the final episode of the BBC's Blue Planet II in 2018 and its ubiquitous presence in the environment.

Appropriate design of plastic packaging so that there is not a mix of melded materials or a mix of different type plastics that cannot be recycled easily or cannot be segregated by virtue of design, should be encouraged.

Reusable materials should be encouraged where possible and incentivised e.g. lower tax rate on coffee purchased through reusable cup. Non perishable items should be provided in bulk at retail outlets so they can be filled with reusable containers e.g. washing powder.

Coffee containers are compostable so long as they are segregated with compostable waste. Compostable lids should be used also. Appropriate diversion of these items is required.

Single use plastic strategy elimination should be supported by using plastic packaging containers through recyclable plastic, appropriate segregation being made available and development of recycling and closed loop outlets.

Returnable plastic packaging including recyclable pallets, boxes should be encouraged where possible in the distribution chains.

A collaborative approach with policymakers in neighbouring countries for further recovery of plastic should be undertaken where there are technical or commercial barriers to developing technology in Ireland.

Having a clear guide of different types of plastic and recycling grades is important in informing businesses and households as to what can be segregated for further recycling.



Exemption

Ireland should consider application of exemptions for simple activities on preliminary waste treatment such as sorting or processing in certain ways or preparation for reuse, recycling or recovery where such processes are straightforward and do not present risk to the environment or human health.

In addition, materials that can be recovered and reused for the process that they originally arose should be considered exempt in a similar way that packaging waste that is recovered in a closed loop under Packaging Regulations.

This may be the case for incorporation of secondary materials that are returned to source and be returned to the process.

End of Waste and By-products

End of waste and by-product will benefit from clear guidance and national End of Waste decisions where the standards for meeting requirements were clearly set down. Particularly for aggregates arising from Chapter 17 Construction and Demolition Waste and Chapter 19 Material Recovery Facilities producing aggregate materials.

For soil and stone produced from a greenfield development that is segregated appropriately, should be a simplified method for recovery. Where outlets are identified in the planning process exemptions on recovery should apply.

Where materials are covered by animal by-product legislation and also waste legislation, there is a duplication on legal requirements and enforcement of same.

Fees for by-product notification assessments may help where decisions are required urgently, also fees may encourage operators to consider content of applications. Otherwise, consistency for demonstration of compliance will give clarity and allow industry to put together applications required by the Agency.

Research and development funding initiatives available for end of waste research on materials would assist particularly on aspects that are not site specific and where results would benefit the wider Industry. It is challenge for industry that are innovating end of waste options and spending money, that such research can be accessed through freedom of information. Should be incentives for innovation on end of waste initiatives where the benefit is industry wide.

End of waste criteria for compost, digestate and other materials that fall into organic fertiliser and soil improver would be useful also. There may be other areas also and the Department should be open to development of criteria that would facilitate the circular economy and they should be guided by experience of other countries.



Food

Return of carbon to soil in most effective method for recycling of waste food arising with respect to the climate change mitigation and circular recovery. Appropriate development of products that can meet technical standards required should be encouraged.

Green Public Procurement

Specification for recycled materials, environmentally friendly manufactured product through substitution is encouraged. Any policy documents produced in this area must be careful not to specify one environmentally friendly product over another.

Challenges of accurately reflecting embedded carbon must be overcome where claims are being made on carbon footprint of materials.

