

Denis Dunne

From: Maureen O'Donnell <[REDACTED]>
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To: wastecomments
Subject: public consultation response for waste action plan, circular economy

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Hello, please see the following response on the public consultation for the waste action plan. Apologies that the response is somewhat limited. Hopefully it will be helpful. Please let me know if there will be other opportunities for me and my colleagues to engage on further development.

Kind Regards,
Maureen O'Donnell

1. Sect 3.7 consultation– municipal waste – other ideas. Consider the idea of new business models and economic opportunities as part of the larger municipal waste and consumer education strategy. From Vancouver Zero Waste strategy: "To create social and economic opportunities - connecting people through zero waste initiatives can inspire greater community involvement, partnerships, innovation, and sharing of materials. The economic potential of recovering and re-selling valuable materials represents new business opportunities that can help to grow a local, circular economy." (reference: <https://vancouver.ca/green-vancouver/zero-waste-priorities-and-background.aspx>)
2. Section 3.8 – civic amenity sites: civic amenity sites should accept all waste streams at no cost to the consumer to discourage illegal dumping and funding for this could possibly be achieved by reducing the costs associated with existing waste collections associated with illegal dumping and from monetising the collected waste as a resource. Also consider widening the practice of co-location of charity and other reuse shops (particularly furniture, white goods, and other problematic streams) to civic amenity sites and increase the reuse opportunity of bulk waste (furniture, etc.) by advertising free collection of bulk items to charity shops/furniture revamp versus charging for drop off to civic amenity sites. Consider contracting with charity shops to perform all collections of household bulk waste. Funding could be a mix of monetisation of waste as a reused good and a reuse levy on the purchase of goods which are difficult to monetise as waste (i.e. plastics, single use items).
3. Section 3.8 – apartments: In order to increase recycling and reduce contamination rates the sources of the problem must be addressed. These include: residents not typically paying for the service as a direct charge (a lack of awareness of waste costs/financial benefits of recycling), fluctuation of tenants (move-in or move-out purges), and particularly within culturally diverse areas (language barriers and cultural norms). These factors are exacerbated by the transient nature of the rental market (particularly short-term lets). Education campaigns (signs, recycling guides, etc.) seem to only have a limited effect, but potentially changing the charging schemes to mirror single household collection (direct owner-occupier/landlord charging), providing regular WEEE/bulk waste amnesty collection events (included in management fees), and considering additional property tax all multi-unit development properties to pay increased education and behaviour change initiatives might help increase recycling and reduce contamination. Providing all units with food waste collection bins/boxes and recycling containers could help as well. As could the introduction of 'in sink' food waste disposal units: <https://www.irishtimes.com/life-and-style/homes-and-property/interiors/houseworks-is-it-okay-to-have-a-food-waste-disposer-1.3769259>
4. Section 3.9 - business recycling: many of the office-based companies we work with have difficulty with recycling due to contamination. For example, in a waste audit we conducted with Repak last year for one of our companies, contamination was observed in virtually every common bin for the company. In order to increase recycling, contamination has to be addressed – this is largely done through education, first the facilities managers to ensure they are putting good practices in place (signage for employees, educating

catering & cleaning services on proper practices, implementing plastic-free or zero waste canteens, providing employees with reusable cups/water bottles/tableware, etc.) and then with employees themselves to understand the issues with contamination. This is very much tied to behaviour change and must be addressed as such – to do so though has a knock on effect, improving domestic waste recycling.

5. Section 4.7 (and 5.7)– food waste (and single use packaging). My understanding is that the majority of food waste in Ireland is coming from consumers. Food waste at the producer and retail level can be monetised and turned into a resource (anaerobic digestion, food donation/corporate philanthropy, etc.) There is one area though where responsibility has been perhaps improperly shifted to consumers – perishable foods bundled in packaging (and associated price incentives to consumers) which encourages consumers to purchase more than they might need. The 49 cent bag of carrots or the three pack of red, yellow, and green peppers are examples of this. Retailers argue that packaging is needed to extend shelf life, but it's not necessarily a valid argument in that it merely transfers shelf life responsibility from the producer/retailer to the consumer. Given today's advanced product logistics systems, producers and retailers are much better prepared to deal with this challenge than consumers and should be held accountable. Suggestions include mandated packaging-free fruit & veg which would have a dual benefit of reducing single use plastic packaging and helping to reduce food waste at the consumer level. At the very least, retailers should be required to take back single use packaging and set and adhere to targets for reducing/recycling single use packaging which would then incentivise them to work with producers and consumers on more holistic food waste reduction options.
6. Section 4.7 – single use packaging. As the former owner of a snack food production company I am acutely aware of the lack of availability of compostable packaging alternatives for foods where packaging plays a key role in shelf life. Mine was the only snack food company in Ireland selling into major multiples that used compostable packaging. I sourced my packaging from Poland as this was the only country where I could find affordable laminated film packaging that met European compostable packaging requirements. That packaging still cost 10 times the cost of non-compostable/non-recyclable packaging. It also required industrial composting facilities so was somewhat limited in its ability to be composted. Again, the solution to this is not to put the onus on the consumer, but instead to require the retailers to 'internalise' this externality by accepting packaging back for proper disposal and thereby incentivise them to work with suppliers and consumers to implement more environmentally friendly alternatives.
7. Section 7.7 – circular economy transformation - Recognising that the Waste Action Plan Circular Economy definition (pg 1) mirrors the EU agreed definition, there is a more holistic definition that should be considered to facilitate transformation. As stated: "Circular Economy (i.e. one in which we keep resources in use for as long as possible, extracting the maximum value from them while in use, then recovering and regenerating products and materials at the end of each service life)." misses the explicit reference to a critical component of circular economy "Design out waste and pollution" which overlaps slightly with extracting the maximum value of resources in use, but also refers to a systems design of product/service development that tends to be used more in transformative business models (product to service for example). Also missing from the definition is the regeneration of natural systems which is a critical component of circularity. This is particularly relevant when linking to the bio-economy and transforming food waste. (reference: <https://www.ellenmacarthurfoundation.org/circular-economy/concept>)
8. Section 8.7 – citizen engagement – Is there a circular economy educational model available in schools (and perhaps in conjunction with the green flag schools programme)? Similar to biodiversity, could circular economy and zero waste be more explicitly linked with Tidy Towns?
9. Section 8.7 – citizen engagement – There are numerous studies that point to varying consumer attitudes on reused goods. In 2017 I worked with CRNI and Ireland Thinks on a consumer behaviour study which yielded significant insights. Attitudes vary by demographic segment and by the goods categories themselves so it's a difficult topic to address in targeted campaigns. Broad campaigns that address both disposal and attempt to promote purchase (sustainable lifestyles) have been shown to be effective in Scotland. There is significant government (Scottish and EU) funding for these campaigns, and indeed these should be part of overall citizen engagement and awareness. Scotland's Revolve programme (and the broad campaign they engaged in several years ago) is a good example: <https://www.zerowastescotland.org.uk/revolve>
10. Section 9.7 - construction waste – construction waste is both a challenge and a missed resource opportunity. Would it make sense to consider implementing a residential planning/permitting scheme similar to the city of Vancouver? <https://vancouver.ca/home-property-development/demolition-permit-with-recycling-requirements.aspx>

11. Section 16.5 – factors – I believe all of the choices shown contribute to waste crime. Also there is a (relatively complex) cultural component which should be researched more thoroughly in order to address. It's good to see the EPA will be conducting research in this area in 2020. It's important with this area in particular to devise a means to get to key root causes – not enough is known to adequately address this.
12. Did not see this as a consultation question – waste licensing and VAT rates – it's been suggested in EU circular economy forums that introducing a lower vat rate for reused goods and loosening the regulations for waste licensing for waste targeted for reuse would have a transformational and positive effect on waste processing and consumer purchasing behaviour. Is this something being considered for Ireland?

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Maureen O'Donnell
CR Advisor & Mark Manager
Business in the Community Ireland
3rd Floor Phibsborough Tower
Phibsborough Road, Dublin D07 XH2D
T: + 353 1 874 7232
M: + 353 86 7808762
www.bitc.ie



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