



CIWM

Ireland Centre

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CIWM Ireland response on Public Consultation Waste Action Plan for a Circular Economy

Submission via e-mail to: Wastecomments@DCCAE.gov.ie

Date: 21th February 2020.

Introductory Remarks:-

The Chartered Institution of Wastes Management (CIWM), Ireland Centre (CIWM Ireland) wishes to make the attached submission in relation the Public Consultation Waste Action Plan for a Circular Economy.

CIWM Ireland is one of ten CIWM Centres comprising of c.5,800 waste management professionals working in all sectors and levels of the waste and resource management industry. We represent up to 130 members. The Centre Council comprises of 14 Councillors (Chartered Resource and Waste Managers) representative of most sectors of the waste management industry such as Academia, Consultancy, EPA, Local Authority, Producer Responsibility and Social Enterprise.

CIWM sets the professional standards for individuals working in the industry and has various grades of membership determined by education, qualification and experience.

On behalf of CIWM Ireland, can I thank you for the opportunity to provide our members collective view.

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CIWM Ireland Submission:- Public Consultation Waste Action Plan for a Circular Economy.

CIWM Ireland welcomes the opportunity for consultees to review and provide input. CIWM Ireland acknowledge that the context of the consultation covers a range of issues relevant for the development of a Waste Action Plan for Ireland as the part of the transition from a linear to circular economy.

The consultation paper is laid out in a manner to facilitate a structured response, being organised around thematic areas with a number of questions at the end of each section. The CIWM Ireland response (in blue font) below follows this layout.

CIWM Ireland acknowledge the conditions of the consultation and that it is subject to the provisions of the Freedom of Information Act 2014 and Access to information on the Environment Regulations 2007-2014.

Consultation Questions and CIWM Ireland Responses.

3.7 Consultation Questions – Municipal Waste

What further measures should be put in place by Government, regulatory authorities (EPA, local authorities, etc.) and industry stakeholders in order to promote and incentivise waste prevention and improve proper segregation and recycling of waste by both households and businesses?

Response:- Undertake an co-ordinated campaign of education and awareness targeting all commercial and household waste client/customers of waste management companies. Same message to be delivered by all stakeholders via all media. Incentives via cost savings to be part of the offer.

Continuous rolling programme of awareness, stick of Fixed Penalty Notices and (FPN's) Court fines for failure to implement the desired behavioural change of doing the right thing.

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

Response:- They are many stakeholders (including Government bodies, etc) via a variety of education and awareness measures promoting prevention and recycling of household and commercial waste. It is many years since there was a co-ordinated joined up thinking programme using all communication channels (TV, Radio, Social Media, web sites, Citizen Advice, NGO's, Community Groups, Local Environmental Awareness Officers, Waste Collection Companies, Producer Responsibility Organisations, IBEC, Mywaste.ie, etc). CIWM Ireland recommend that a national programme is put in place and run continuously at regional and local levels. That a real time feedback mechanism/tool to/from the target audience

is in place to measure its effectiveness and provide continuous improvements to keep up with changes in waste management practices. This will take time, there are no quick fixes.

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

Response:- To have a one stop shop for all communication re: Household and Commercial waste management.

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

Response:- Too much noise in a crowded space as outlined earlier. Some misinformation and “Green Wash” occurring. Conflicts of interest, etc. Who pays?

Improved, clear and concise continuous awareness raising on best practice for household and commercial waste management. Use of Fixed Penalty Notices (FPN’s) and resort to courts for subsequent errant householders and business owners.

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?

Response:- As per above.

3.8 Consultation Questions – Household Waste

Is incentivised charging working in your opinion? Are households being financially incentivised to prevent waste and recycle correctly through the 3 bin system?

Response:- Incentivised charging has been proven across Europe and further afield to work. However, work is needed to control the pricing structures / systems in terms of a cap on annual charges, etc.

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?

Response:- For those who wish to change current behaviours or seek a value for money service, such a proposal will work. For the more affluent, costs doesn’t appear to enter the equation and therefore perhaps a higher tariff should be levied on those who produce waste beyond a certain income threshold to be decided via consultation on effective behavioural trigger action levels.

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?

Response:- Civic Amenity Sites (CAS) and/or Recycling Centres have been provided by Local Authorities (LA's) across the country with exchequer assistance through the Department since 1998. They have been a cornerstone in driving recycling rates from 4% in the late 90's to current levels as reported by the Environmental Protection Agency (EPA). They provide a valuable service particularly in rural areas as well as providing an economic alternative to the private sector. Nationally, there should be an agreed minimum level of service provided by all sites such as domestic waste including bulky waste, food waste, WEEE, batteries, recyclables (steel and aluminium cans, glass bottles, mixed paper, cardboard, plastic bottles, textiles). Thereafter, it should be for each LA/operator to determine what additional level of service that they wish to provide / be economically viable.

Not every site is suitable to assist a reuse activity as the type of materials being presented may not be worthy of reuse. Local arrangements with the LA's and service providers (how will these be chosen etc) to collect materials on site for reuse should be considered. Perhaps allowing registered reuse organisations controlled access a site on specified days and hours to collect from site material set aside for preparation for reuse. Consideration should also be given to look at how Clackmannanshire Council in Scotland provide such a service at their Polmaise Site should be examined. Thought should be given to the prevention of fraud or theft from the site of the resources for re-use.

Consideration of a Producer Responsibility Initiative (PRI) on bulky waste items such as beds and mattresses, sofas and similar have previously been suggested by CIWM Ireland. With the increasing demands on a reducing environment Fund and as more Third Sector/Charity Organisations enter this space, funding demands will only increase.

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

Response:- For new build appropriate waste management services and facilities must be included in planning future developments.

There are many European models and examples available and property management companies need to be held directly responsible in this area. The waste collectors can provide the collection service and treatment options for such material are available and more infrastructure will be built out, if there is certainty of supply. WRAP in the UK have published a report entitled "*Food Waste Collection Trials – food waste collections from multi-occupancy dwelling*" and the systems in Berlin in Germany are also worth examination in an effort to address the presentation issues that arise around this type of communal infrastructure.

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?

Response:- The introduction of a waste regulator needs to be revisited and considered as part of this discussion. Is the Pricing Commission working as intended and again should be reviewed as part of the consideration of a waste regulator (not just an economic regulator) for the entirety of the sector, not just solely focussed on collection and treatment?

3.9 Consultation Questions – Commercial Waste

How could pricing structures for commercial waste collection be improved to incentivise better segregation and recycling of waste? For example, should pay weight be introduced for commercial waste?

Response:- Pay by weight is critical for commercial waste collection as we exit the recession nationally. Take a walk down any main street in Ireland at evening time, before refuse collection and you will find very large volumes of waste awaiting collection including segregated recyclables, which all too frequently have been cross - contaminated. If you further lift the lid of a refuse bin you will see food waste therein which is capable of being digested or composted as well as recyclable materials therein. There is a need to focus on this area, to train staff and to have these companies engage expert advice that will assist them. It is concerning - to see that just 41% of MSW was recycled in 2016 compared with a 55% target in 2015 and a 60% target in 2030. Should we not strive to attain the 60% target in 2025 and the 65% target of 2035 in 2030? If the levels of consumer spending increase and the predicted population growth forecasts come about, the challenge presented now would greatly magnify to make current difficult targets unattainable.

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

Response:- Is there a need to consider the frequency of waste collection for commercial waste and increase it to twice weekly – this is something that merits consideration with relevant bodies (e.g. National Waste Collection Permit Office (NWCPO), Irish Waste Management Association (IWMA), Recovery Operators (RO's), Local Authority's (LA's). Is there a need to provide through the Waste Management Planning Offices a specific training/marketing campaign similar to My Waste.ie or is that the vehicle to use by including such information on that portal?

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)?

Response:- Uncertain. But, existing Government backed programmes that already aim to promote the sustainability credentials of businesses could better align their objectives with the Circular Economy agenda. This would create synergies and convey messages through existing channels. Best practise waste management being order of the day. Better communications referencing the existing packaging waste regulations requiring segregation of specified waste packaging materials would help.

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?

Response:- It needs to be quick, coherent, focused, risk assessed, well-funded and nimble while being robust enough to deliver its planned objectives.

4.7 Consultation Questions – Food Waste

What are the underlying causes of food waste in Ireland?

Response:- A lack of appreciation of the carbon and associated resources such as energy, water, nutrients, habitat protection, etc to get it to the shelf/table; a lack of education around the issues of food waste and the environmental consequences of that waste; a lack of standards/compulsory mechanisms requiring the maximum capture of food waste in our homes, shops, deli counters, shops, hotels etc. Potentially to date, there has been too much focus on the “end of the pipe” when the food is wasted and not enough on the prevention end. There are some great Irish companies out there who produce food who cannot plan for the waste or unsuitability, such as Meade Potatoes and other similar fruit and vegetable growers, who have developed other avenue’s and outlets for their produce and we need to harness their thinking in a working forum somewhere on this issue. Look at recent Repak Award Applicants in the Waste Minimisation category such as 2019 award winner Hotel Doolin, Java Republic and University College Cork.

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

Response:- If a target is likely to be set at EU level, then we should set a benchmark and strive to achieve it. That way we have set off on the journey to the destination and primed the pump so to speak in preparation. Given the overall challenges of moving towards a Circular Economy and to undertake appropriate Climate Change Action this would at the very least be prudent in our view.

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

Response:- The short term measures outlined in the consultation document are all tools in the delivery of such aspirations and again for another day, a small tight knit forum of the relevant stakeholders in this area should be brought together. Ireland is generating up to 1 million tonnes

of food waste each year. A mandatory food waste prevention target of 50% is initially proposed by 2030 with interim targets along the way.

Reference: <https://stopfoodwaste.ie/resource/the-environmental-impact-of-food-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?

Response:- None at this time.

5.7 Consultation Questions – Plastic and Packaging Waste

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

Response:- With improved Citizen Engagement by joining up all the relevant stakeholders in this space that communicate with the public delivering the same or similar continuous message statement. Ultimately as consumers we all have a part to play in delivering targets, be they be prevention/reuse/recycling/recovery and disposal. For this to be effective they must be informed on a continuous basis to enable them to make informed decisions as to their product purchases and understanding of their shared responsibly. Mandatory separation with FPNs for failure or contamination would be an option. Keeping the message clear and consistent and ultimately to consume less (which will cost them less).

They are many public and private bodies in this space already such as the Department of Communications, Climate Action and Environment (DCCA), the Waste Management Regional Offices, EPA, Local Authorities, Producer Responsibility Organisations (PRO's), Citizen Advice, Waste Management Collection companies, Social Enterprises (e.g. CRNI, Rediscovery Centre) other Non-Government Organisation's (NGO's) e.g. The Environment Pillar, Voice, Green Peace, Chartered Institution of Wastes Management (CIWM), etc.

Do waste collectors have a role to play?

Response:- Yes. They already do. Each waste management company has a Customer Charter whereby they lay out as part of this, how they, communicate with customers to correctly use the bins and what they can and cannot put in them. But cross contamination continues and a system of better control needs to be implemented such as targeted education and awareness of troublesome customers and finally penalty sanctions where they customer is charged more or the service withdrawn upon liaison with the Local Authority/NWCPO. Waste collectors could be mandated to spend a certain proportion of income on communications.

What is the role of retailers?

Response:- To ensure their products sold are packaged with recyclable material. That the customer recycling information on the packaging is correct and easily understood. That their customers are enabled to make informed choices. To proportionally and fairly share their cost burden in the responsibility supply chain. To feedback to the manufacturers of the packaging their customer feedback on same. To move to net zero carbon for their products and packaging.

What is the role of manufacturers?

Response:-

- To manufacture and supply packaging products that have recycled content and that is itself recyclable after point of sale to the consumer;
- To fairly share their cost burden in the responsibility supply chain;
- To source raw manufacturing material from sustainable and environmentally compliant sources;
- To utilise best practice to keep material resource losses to a minimum and reuse/recycle wherever possible to ensure many use lifetimes of the material;
- To move to net zero carbon for their products and packaging.

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

Response:- Yes. All parties (Refer to first answer to 5.7 Consultation Questions – Plastic and Packaging Waste) have a role. They all should use their contacts with citizens to communicate the same message. At a community level engagement via the pilot Recycling Ambassadors Programme was a good example. Voluntary initiatives could be funded if they can demonstrably accelerate the de-carbonisation of the sector.

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

Response:- Yes. Why not consider via PRO's licences to place stretch targets(Greater the EU) to ensure that all times as the relevant producer responsibility organisation they are optimising all efforts and funding (polluter pays) thereof with the national objective to optimise achievements. The inclusion targets to move towards net zero carbon.

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?

Response:- Whilst it's certainly a step in the right direction with the introduction of eco-modulated EPR fees which should eliminate the use of non-recyclable plastic, it's too early to say if it will be effective in total. There are trade off's and a balance to be achieved that stopping the use of certain plastics may cause unintended consequences creating much larger waste problems than the non- recyclable plastic packaging is trying to resolve.

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?

Response:- A single body to co-ordinate, measure and monitor all the stakeholders in this space such as a waste regulator (not just economic) should be consider with the objectives of a one-stop shop maximising synergies and cost control for the industry on an equitable basis.

6.6 Consultation Questions – Single Use Plastics

What measures could be considered to reduce the amount of single use food containers we use, taking the provisions of the Packaging Directive into account? Should a ban on non-reusable cups be explored?

Response:- It is unknown to us the size/scale of the use of single use food containers. Single use food containers CIWM Ireland, understand are containers used primarily in the food take away industry. They consist of cardboard cartons, aluminium foil trays and plastic tubs and trays - mostly all recyclable once clean and dry. Take away food is part of convenience lifestyles in the western world. Food safety is paramount, and any changes would need to be considered to ensure no unintended consequences such as poor food hygiene occurring with the use of any container alternatives – such as reusable containers. There is uncertainty in CIWM Ireland recommending food container reduction measures when the market size and use is not known to us. As in most things, it's a balance approach. Increase Citizen Engagement and consumer awareness will help improve recycling of used food containers and keep the material within the economy for further use before energy recovery/disposal options are used.

CIWM Ireland in another consultation on the coffee cup levy consultations stated our view *“the impact of managing single-use can be strengthened by making capture and recycling easier and more efficient and effective. Cup manufactures need to understand the recycling/reprocessing process and produce products that are easier to put back into the circular economy, so reducing the impact on landfill and energy from waste disposal”*. *“CIWM Ireland believes there might well be unintended consequences. Reuse cups may have a greater environmental impact – how many uses are needed to achieve breakeven carbon neutral status? More importantly for the resource and waste sector are they fully and easily recyclable at the end of their life?”* The concerns re: Single Use Coffee Cups mentioned above are the same with the use Single Use Food Containers.

Whilst on the face of it, a ban on the use of non-reusable cups has its merits and would in one fell swoop deal with disposable single trip cups, but it may have unintended consequence. At the moment they are information gaps limiting informed choices to be made without knowing all the risks. Similarly, CIWM Ireland do not know the scale or use of the single use food container sector.

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?

Yes. Using the example of Coffee cups - “*schemes are working in the England (<https://www.costa.co.uk/responsibility/our-cups/>) and there are innovative cups being manufactured that allow you pay with the cup!*” Other options to be considered would be discounts when your reusable cup is presented.

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

Response:- Yes – applying the principles of producer responsibility and polluter (not consumer in this instance) pays – retailers are in the supply chain at the point of sale and have a large responsibility in how they sell their products/goods.

Are there additional products that are suitable for consumption reduction?

Response:- Yes, across the whole consumer market that is demand and supply driven via market forces - a major rethink on the one trip, one use and short lifetime of products need to be considered and evaluated so that informed action as appropriate can be undertaken to deliver a true Circular Economy in respect of efficient and effective resource management.

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

Response:- Sales data analysis – all products (CIWM Ireland believe) these days have unique identification barcodes (etc). Product manufacturers routinely have this data to control their business in terms of managing supply and demand for their products. Albeit the data is commercially sensitive; arrangement can be made legislatively to require its disclosure for such environmental and waste management purposes.

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?

Response:- Yes. At a very minimum it will bring awareness to the mind of the consumer that there is an environmental impact associated with their purchase that they have a shared responsibility to shoulder it and make alternative choices (if they are available).

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

Response:- It’s lifestyle choices in a free market economy challenge. CIWM Ireland do not know of sustainable alternatives for two of the major sources of litter - Cigarettes and Gum.

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

Response:- Most single use plastic beverage bottles have different coloured caps and all are not the same polymer as the rest of the container. Therefore, when they are recycled (made into rPET pellets for remanufacture) they need to be separated. This will add cost to the bottom line of the rPET pellet producer that will need to be absorbed into the remanufacturing supply chain in the short term. Tethering can be done (some having done so already in other plastic containers, e.g. Milk); however, industry claim it will add cost and increase carbon footprint as the tethered plastic cap will need to be stronger and heavier and go against all the years of light weighting practice. Alternatively, it is muted that by increased education and awareness of consumers that to simply screw on the cap, when putting the waste plastic bottle in for recycling can be just as effective – with 90% capture rates in Germany and Denmark. Money is best spent on increasing collections rates they suggest.

References:- <https://www.newfoodmagazine.com/news/76731/pwc-plastic-carbon-cost/>
<https://www.euractiv.com/section/circular-economy/news/drinks-giants-rail-against-eu-bottle-cap-plan/>
<https://ima.it/automation/tethered-caps/>

What are manufacturers doing now to ensure all beverage bottles contain 30% recycled content?

Response:- PET polymer is the only plastic used in making beverage containers. (HDPE is used for milk containers/bottles). CIWM Ireland understand a number of major brand holders have gone some way to achieving 30% and greater. Limiting factor is enough of good quality clean rPET.

References:-<https://www.letsrecycle.com/news/latest-news/coca-cola-to-increase-rpet/>
<https://www.nestle-waters.com/sites/g/files/pydnoa611/files/asset-library/documents/press%20releases/2019/all-you-need-to-know-about-plastic-bottles-2019.pdf>

<https://www.coca-colacompany.com/sustainable-business/packaging-sustainability>

<https://www.pepsico.com/news/press-release/pepsico-to-more-than-triple-recycled-content-in-its-plastic-bottles-to-50-p-in-the-european-union-by-2030>

What, if any, are the obstacles to achieving this?

Response:- According to the manufacturers not enough quality rPET is available due to collection inefficiencies.

References:- https://www.sustainabilityexchange.ac.uk/factors_affecting_recycling
<http://www.wrap.org.uk/sites/files/wrap/rPET%20Quality%20Report.pdf>
<https://www.plasticsconverters.eu/project-1>

Is there sufficient supply of recycled plastic content to achieve this ambition?

Response:- No. According to major plastic beverage manufacturers due to quality and supply inadequacies. Please refer to our answer above.

To what extent is price a factor?

Response:- Price will always be a factor that as indicated in other responses is at the mercy of the variances in the market – vPET v rPET, etc.

References:- <https://www.woodmac.com/press-releases/was-2019-the-year-of-recycled-pet/>
<http://www.getrecyclingtech.com/news/why-is-2019-called-the-year-of-rpet-what-is-30523171.html>

Is there scope for Ireland to be more ambitious and go beyond 30%?

Response:-Yes according to industry (manufacturing) information. Collection is a key determining factor on this ambition. But has to considered in the collection of mixed material types of paper, metal and plastics. The plastics being mixed polymers in themselves consisting of PET, HDPE, PP, etc., requiring further sorting. One of the known unknowns is what will happen to the quality of the recyclate (and by extension the new product) once it has been mechanically recycled a number of times as the polymer chains get smaller each time they go through the process.

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

Response:-Yes, it can be enhanced and may achieve a collection rate of 90% collection. But the key factor is the efficiency of rPET output for plastic bottle to bottle recycling. CIWM Ireland doubt it can do this alone when dealing with other competing factors such as clean cardboard, metal cans and other mixed polymer plastics collection. Single collection is the best option for the solution to meet the manufacturers demands of quality and supply.

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

Response:-Yes, provided it works with and compliments other dry recyclable collection. There needs to be joined up thinking in its delivery and cost. What tonnage of this material is placed on the market leading to what tonnage will be collected from each household leading to a cost benefit analysis?

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

Response:- They should apply the concept of risk and reward. If the collection industry goes towards separate collection then then offset this risk and encourage its uptake and sustainability, they should pay a greater incentive price for this versus co-mingled. As is evidenced over the years the initial cost is high but can reduce as scale and efficiencies increase and collectors get reward from manufacturing industry from stable demand and price.

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?

Response:- See previous responses to similar question.

7.7 Consultation Questions – Circular Economy

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

Response:- The circular economy is closely linked to the bio economy. Many bio-based materials are renewable, biodegradable and compostable and, when due care and attention is focused on their lifecycle, environmental impacts and sustainable sourcing, they can become the basis for important circularity in an economy. The bio economy is thus increasingly being seen as the biological engine of the circular economy. The circular economy is also a key means of working towards more long-term sustainable economic, social and environmental development. However, it is important to note that increased circularity will need to be supported by efforts to reduce and eliminate materials and practices that have negative environmental impacts (such as carbon emissions). Together with investment in and support for prevention (including citizens engagement, better design, sharing, leasing, reuse and repair) and preparation for re-use (including repair and refurbishment) across a range of sectors is necessary and will yield the greatest long term sustainable transformation to a Circular Economy.

At EU level, the EU Circular Economy Package is at an advanced stage of legislative development, following the publication of the European Commission's plan in 2015, Closing the Loop: An EU Action Plan for the Circular Economy. A key aim is to help European businesses and consumers make the transition to a stronger and more circular economy where resources are used in a sustainable way. The Closing the Loop Action Plan contains 54 measures covering a range of areas concerning consumption and production processes and products, across priority sectors including plastics, food waste, critical raw materials, biomass and bio-based products, and construction and demolition. It includes financial incentives for research and innovative policy measures using structural funds (€5.5bn) and Horizon 2020 (€650m). This is combined with a suite of regulatory and legislative actions aimed at changes to product design, production processes, waste management, consumption, procurement, boosting the market and monitoring. This Action Plan is well documented in research and other

recent documents from the European Commission. Its measures are in the implementation stage, while the legislative ones are now with the European Parliament and Council of Ministers for final approval. This Action Plan follows on from a strong focus in the EU 2020 Strategy on resource efficiency and a Roadmap to a Resource-Efficient Europe. A New EU Action Plan for the Circular Economy, supporting the European Green Deal is under advanced stage of development following recent consultation. The European Commission estimates that the circular economy can save EU businesses €600bn. However, the combined economic, social and environmental benefits are likely to be considerably more. The World Economic Forum reported in 2014 that the materials-saving potential alone was estimated at over \$1trn per annum.

References:- <https://www.bitc.ie/newsroom/news/circular-economy-developments-from-the-irish-government/>

<https://dbei.gov.ie/en/Publications/Publication-files/Realising-opportunities-for-enterprise-bioeconomy-and-circular-economy-Ireland.pdf>

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

Response:-As a small, open economy in the EU, Ireland's move towards a circular economy will continue to be shaped by EU policy and a shift in international corporate practices. These practices are in evidence through examples such as Dell running a recycling scheme for the plastic in its hardware; the French carmaker Renault collecting used parts for remanufacture, Rolls Royce Aeronautical now only leasing their engines to the worlds aeroplane manufacturers and the Swedish chain H&M recycling clothing.

Communications of new models of operation need to be showcased, along with the associated costs and benefits.

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

Response:- In Australia, their waste plan proposes to reduce total waste generated by 10% per person by 2030 with an 80% average resource recovery rate from all waste streams following the waste hierarchy by 2030 and with measures to significantly increase the use of recycled content by government, local authorities and industry. However in advance of target setting Ireland must put in place a Circular Economy metric and reporting system that allows detailed mapping of existing consumption, waste and resource flows an integrating existing waste management reporting across all sectors, PRIs and regions. This preparedness would allow a more meaningful and ambitious waste reduction target to be set in the medium to longer term.

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?

Response:- While both commercial and social enterprise momentum is building in Ireland, there is a risk that it could remain undeveloped without a strategic, overarching policy focus. While Ireland has developed a strong foundation in resource efficiency, there is merit in starting to explore to what extent circular economy practices are or become transformative and stepping beyond incremental efficiency measures. Insights from Scotland, the Netherlands and Finland point to the key role of innovative supports in unlocking new products, services and technologies that can seize economic, environmental and social opportunities from across the spectrum of circular economy practices.

Some other key messages that need to be communicated include:

- The circular economy has to factor in our global economic model and mainstream thinking;
- The circular economy can help achieve the Sustainable Development Goals;
- The transition to a circular economy should be driven by businesses and cities in particular;
- Regulation and economic instruments can be used such as public procurement and national roadmaps;
- The circular economy will generate growth, including jobs and enterprise, while also saving natural resources and reducing pollution;
- Investment is needed in new technologies, business models, digitisation and innovation;
- The circular economy can combat climate change so as to achieve carbon-neutral and resilient societies;
- The circular economy will make waste a valuable resource. It will consume services and produce more durable, repairable, reusable and recyclable products.

“Exporting is a loss of waste resources that could otherwise be used to generate employment, open up new markets for Irish products, and boost domestic economic activity. The benefits of managing waste as a national resource, as part of the transition to a circular economy, are increasingly being recognized across Europe”. (DECLG, 2015).

Leadership from government, communications and data showing that waste arisings and economic activity have been decoupled will help to convince those that need to be convinced that action needs to be taken and the impact is positive.

8.7 Consultation Questions – Citizen Engagement

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

Response:- A considerable amount of work has been undertaken in establishing the “My Waste” unit and they are doing very good work in terms of selling a unified and consistent

message across the country. This unit requires more time to bed in and to consolidate their programs of work with more coordination activity aligned with other stakeholders proving waste and resource communication programmes. The StopFood Waste campaign requires further funding, resources and a directed plan of action with regular reviews and updates. There needs to be just a small number of organisations in this sphere with a very specific and consistent message to the public and the food business.

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

Response:- A joint approach to funding is required and the various sub-sectors need to support these campaigns where they don't already do so. The work of organisations such as WEEE Ireland and Repak ELT is recognised here as well as the funding and resources they utilise in this area.

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?

Response:- In the main, most of them provide information as to what goes into the bins that they provide to their customers. However, nationally it's a mixed bag, so to speak. Some use pictorial or diagrams, other use a list with dos and don'ts to their stickers. But, these are not updated, for instance with the decision to preclude soft plastics in the mixed dry recyclable bin – how many have communicated that to their customers. Yes, they update it on their web sites and some via text to their customers. The challenge of bin cross contamination continues many years later as evidenced by recent EPA surveys post they collection industry publication of customer charters and informing them on how to use the bins correctly. What is the root cause for this behaviour – lack of information, awareness, ignorance, residual bin cost avoidance and/or just not caring? Further questions are; is customer information consistent and regular?, how are they dealing with trouble hot spots?, do they work with three waste management regions to raise awareness?, How do they know if its effective or not?, If not, what are they doing about it?

Reference:http://www.epa.ie/pubs/reports/waste/wastecharacterisation/Waste_Characterisation%20Top%20Sheet_logo_v2.pdf

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

Response:- Yes, but how do you encourage/enforce the householder to put the right material in the right bin? Refer to answer to question above.

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?

Response:- None at this time.

9.7 Consultation Questions – Construction and Demolition Waste

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

Response:- Construction and Demolition Waste Management Plans and/or Construction Management Plans should, where relevant, include provision for soil and stone excavated as part the development that cannot be retained on site for use as general fill/ landscape works to be classified as Article 27 By-Product.

Predemolition waste audits should be mandatory on all demolition projects over a certain threshold. These would allow for waste reduction and promote deconstruction so that the materials could be available for reuse or recycling as opposed to all demolition material becoming waste and moving down the waste hierarchy. Construction and Demolition Waste Management Plans should include a designing out waste section whereby waste reduction measures are included in a project from the outset. The Plans should evolve through the stages of construction and changes should be approved by the regulating local authority as part of planning compliance.

Members of the Construction Industry Federation (CIF) and other construction industry trade/professional bodies should be kept informed of End of Waste (EoW) Decisions made by the Environmental Protection Agency (EPA) in relation to construction and demolition wastes e.g. recycled aggregates.

This will allow Construction and Demolition Waste Management Plans and/or Construction Environmental Management Plans to focus, on a site by site basis, on maximising the generation of wastes that meet the ‘permissible input’ criteria for EoW. For example, ensuring pre-demolition asbestos surveys are completed, appropriate ‘soft strip’ works are implemented and segregated waste storage.

All tenders for public construction/demolition projects should specify a minimum ‘recycled ‘content that meet EoW Decisions made either at European Union level or on a national ‘case by case’ basis.

The existing End of Waste (EOW) Criteria and Article 27 systems need a radical overhaul. There is a need to develop EOW criteria for clean soils and subsoil’s and there is also an urgent need to develop protocols for the use of crushed concrete for use as hardcore on sites. Issues around road planings also need to be addressed by way of consideration of how they are assessed and managed in Northern Ireland.

What existing measures are in place that could be improved?

Response:-The Article 27 process is not fit for purpose, with many applications taking far longer than the 10 week decision making target set by the EPA. This is in part due to a lack of resources within the EPA as evidenced by our members and in part due to the quality of the applications. Resourcing the process is a matter for the EPA, but the process could be improved by the following:

- Mandatory fee for each application, with a 50% refund on a successful decision and no refund if the EPA determines the application does not meet Article 27 criteria.
- All applications checked for completeness upon receipt, as is the case with the planning application. Applications that do not contain the mandatory information should be immediately rejected and applicant informed.

What changes could be made to environmental and/or planning legislation to facilitate more recycling of construction waste?

Response:- Current waste management/planning legislation already contains the mechanisms by which recycling can be facilitated, but guidance on how relevant provisions can be implemented at site specific level, e.g. incorporating measures at the planning and design stage to ensure Article 27 By-Product criteria are achieved and requiring, where practical, the use of recycled materials that meet Article 28 EoW criteria in construction may be helpful.

Currently the approach to recycling of construction waste is inconsistent between Local Authority areas. For example, some Councils require a Waste Facility Authorisation on mobile concrete crushers while others do not. A large volume of material which could be recycled (e.g. concrete, bitumen) is being sent to Waste Facility Permitted sites for “recovery” where it ends up being landfilled in unlined tip sites. Updated national guidance on how construction waste should be assessed and regulated would aid in having a consistent approach

It may be worth considering amending the Building Regulations to make Building Environmental Assessment Methods (BEAMs) mandatory. In addition to the current focus on resource consumption they could require the maximum possible use, where practical, of recycled materials that meet the Article 28 EoW criteria in all residential, commercial, industrial and public sector developments. Building materials should also be manufactured so they are readily reused or recycled.

In addition to the current focus on resource consumption they could require the maximum possible use, where practical, of recycled materials that meet the Article 28 EoW criteria in all residential, commercial, industrial and public sector developments.

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

Response:- Management of waste resources is undertaken within a commercial business environment with due regard to legislative and policy requirements, where it make economic sense for the operator to do so. As a general rule, chosen options in waste management from this perspective will flow to lowest cost in free market conditions. Within the free market, competition has many factors, one being when recycle commodity material versus that of virgin material that is produced without associated quality risk and cheaper than the recycle.

It is recommended that a task group be set up to determine the best way to ensure recycle has a level playing field and demand from manufacturers to make recycled product (rproduct).

Options that may be considered are:-

- Mandatory % use of recycle in product;
- Tax exemptions;
- No VAT;
- Minimum Recycle Quality Standards for rproduct;
- Industry self-polices by using independent quality control checks and balances i.e. rproduct is fit for purpose by manufacturer;
- Green public procurement criteria specifying use of recycled materials where appropriate.

This requires a body of work to be undertaken by an appropriate consultant who would feedback to the Department and to the various consultation bodies in existence nationally.

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

Response:- Given the answer to the above the answer is yes, to offset the collections, sorting, and raw material preparation to make a recycling commodity.

Levies should be applied where it can be demonstrated, for example by meeting the EoW criteria, that a recycled material matches the performance specification of a virgin material.

An economic impact assessment should be undertaken on this matter as part of the data collection and evidence finding before considering such a move. However, if there was a greater emphasis with appropriate standards developed for recycled materials, then this could be considered further, but may be premature at this time.

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?

Response:- Construction Waste Management Plans are now required for all large scale developments; however, many of these are generic and pay ‘lip service’ to waste prevention and recycling, and few if any of the developments are subject to oversight by the planning authority to ensure the requirements of the Plans are implemented.

What are the best approaches to raising awareness and education?

Response:- By way of the Construction Industry Federation (CIF), Enterprise Ireland (EI), CIOB and similar organisations to their membership base. Is this an area that Solas, or such other, including CIWM, could develop something which requires all site staff to attend a 2 hour awareness session every 2 years?

What are the barriers/enablers to these measures?

Response:- The measures outlined in the consultation document are comprehensive and are welcomed. To ensure the measures are developed and implemented an adequately resourced body with responsibility for the area should be defined.

Responsibility should be given to a section of the EPA to work with private sector who wish to develop recycled products, new markets and circular innovations in the construction sector. Presently there are no supports for companies working in this area.

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?

Response:- None at this time

10.7 Consultation Questions – Textiles

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

Response:- Household collection for textiles is only via the residual bin at the moment. The householder wishing to have household textiles reused/recycled only have the voluntary option of using charity shops and clothes bring banks. To support household collection consideration of a producer responsibility scheme would be recommended. They in turn would use their members money to arrange for separate household collection for textiles for reuse and recycling and stimulate markets, etc.

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

Response:- Comprehensive and continuous Citizen engagement to enable them make to informed choices as to what they buy and its environmental and societal costs. Presently one would question they sustainability and carbon footprint of the retail clothing markets.

References are:- <https://www.mywaste.ie/what-to-do-with-textiles/>
<https://www.thebalancesmb.com/textile-recycling-facts-and-figures-2878122>
<https://www.planetaid.org/blog/8-little-known-facts-about-our-clothing-habits>
<http://re-dress.ie/when-fashion-is-finished-garment-end-of-life-solutions/>

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?

Response:- None at this time.

11.7 Consultation Questions – Waste Management

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

Response:- Yes. As the vast majority of waste in Ireland is collected and controlled by private waste operators, waste management is fully open to economic push/pull factors and it does not conform to geographical boundaries. Waste is continually moving between the current waste regions and it is economics rather than geography which determines this movement. Also, in relative terms the waste management industry in Ireland is not large. As waste management is not strictly or predominantly regional it therefore does not make sense to assess and plan for waste management within a regional setting.

The setting up of the three regions was a useful steppingstone in progressing from a County by County focused waste management approach to a broader approach. The time is now to move to a waste management plan on a national scale, in keeping with how our waste is now actually managed.

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

Response:- Probably not. Setting the regional offices up on a statutory basis may create unnecessary barriers to future flexibility or change.

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

Response:- No. As waste is almost exclusively managed in Ireland by private operators, it would be difficult to implement a programme of funding assistance for privately owned indigenous waste recycling facilities which would be fair and equitable and would not distort the market or create an unfair competitive advantage for one company over another. Waste recycling facilities must be economically sustainable processes to be successful. Otherwise the idea of a circular economy is built on a false foundation.

Also, such assistance would invariably be funded by the consumer/taxpayer so the cost of waste management for the individual would go up.

If the state has funds available for investment in this area then those funds would be better spent in targeting increased awareness in terms of waste presentation and management to decrease contamination and thereby increase efficiency at waste recycling facilities. This would in turn increase the quality and value of the final product making the waste recycling process more economically stable.

As outlined above given the near privatisation of the waste industry it is recommended that State money be used to legislate for total cost recovery in terms of producer responsibility. At present the model of shared responsibility has worked, but it's time for change, as Ireland move towards optimum targets to be achieved, for them alone or via joint ventures to invest in indigenous waste recycling facilities' and take total responsibility (100% proportionality) for their members products, when they become waste.

However, State assisted seed funding may be appropriate for Research & Development in this area.

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?

Response:- Incentives (perhaps in the form of penalties for non-conformance) must be applies at all levels of waste management to combat the rather high levels of contamination (incorrect material in bins) being presented in our waste.

Reference: <http://www.epa.ie/nationalwastestatistics/irelandswastestory/>

CA activities should be suitably managed so that materials are correctly handled and stored to preserve product quality (e.g. Storage of cardboard and paper should always be in a suitably dry environment)

Waste recycling facility operators should also be held more accountable for their practices so that process inefficiencies are reduced in order to drive an overall lower level of contamination of recyclable material.

12.7 Consultation Questions – By-Products

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

Response:- Yes, albeit on a case by case basis as one size does not fit all, so to speak. The Commission guidance on waste and by-products has it limits due to the complexity of production and process residues (by-products) produced.

For example, by-product guidance for soil and stone should become mandatory and no material should be permitted to be moved until a formal decision is issued. Presently many by-product declarations are incomplete thus slowing down the EPA's ability to make a determination. If sufficient information is not provided by the applicant within a defined timeframe (e.g. 4 weeks) then the material should be determined as a waste.

References:

<http://www.epa.ie/pubs/advice/waste/product/EU%20Commission%20paper%20on%20waste%20&%20by-products2.pdf>

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

Response:- Yes. The introduction of a fee should assist in resourcing the EPA Article 27 team to expedite the decision making process. The ultimate objective is to protect the environment and if process residue (by – products) present a risk to the environment when classified as waste controls are in place to monitor and manage the risk. When classified as by-product, controls are relaxed and reliant mostly on the commercial value to the by-product for it to be managed in a proper manner and not pose a undue risk to the environment.

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?

Response:- A fine balancing act has to be achieved, between risk and reward. It's complex with many variables to operate as an economic operator. While there is a wealth of information, there are data gaps and it is not joined up. CIWM Ireland would recommend as the state embraces the concept of Circular Economy the creation of road maps and sharing of data to enable economic operator and ultimately consumer's make informed decisions.

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?

Response:- No. Even though there are now a number of End of Waste (EoW) decisions made for Recycled PET, LDPE, Aggregate, Fuel and Furnace Bottom Ash these are at company/site specific level and are not national, where by other companies can adopt the criteria and apply it to their own end of waste scenario. Given the ultimate aim is to protect the environment from any associated waste management risk CIWM Ireland believe all EoW decisions should be taken on a case by case basis to determine and control the risk and not have a carte blanche like adoption criteria.

Reference: <https://www.epa.ie/waste/wastereg/art28/>

If yes: - what expertise would be necessary for such a team,

Response:- See answer above.

who should be represented,

Response:- None at this time.

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

Response:- None at this time.

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?

Response:- None at this time.

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?

Response:- None at this time.

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?

Response:- Yes, each dealt with on a case by case basis balancing the risk to the environment and the cost to the economic operator.

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

Response:- Taking a known scientific risk assessment is the normal business tool in these instances. The risk is the standard of the assessment undertaken and the cost to the economic operator. If exemptions are granted, that they follow certain Standard Operating Procedures to potential manage risk and have sufficient bond insurance in place that they sign up to.

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?

Response:- Yes. There are many stakeholders in this space as outlined in our response to Question 27 earlier. To enable synergies and best practice, a body to champion and take the lead for stakeholders to follow should be appointed or existing body to step more into this space. They are data gaps, CIWM Ireland do not know well enough waste and resources flows; to arrive at a definite answer; - does Ireland have a circular economy already?, or even, are we on the road to one already?

15.7 Consultation Questions – Extended Producer Responsibility

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

Response:- Ireland’s producer responsibility current waste streams are for Batteries, End of Life Tyres, Vehicles, Farm Films, Waste Electrical and Electronic Equipment (WEEE) and Packaging. They each have different models of producer responsibility on variants of shared (they funding the major part) to near total cost based on “cradle to grave” principles. However with the advent of Circular Economy requirements they should move towards a more “cradle to cradle” ethos and bare the full cost in the producer supply chain. This will require them to reinvent themselves and be innovative in their solutions how to achieve and take full responsibility along the full life cycle of the goods and products their producers are responsible for. This must be supported by national enforcement programmes and infrastructure with Member State responsibility for national target achievement as the leading Regulator of national enforcement and awareness programmes and provider of municipal waste and resource infrastructure.

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?

Response:-

- Specify and write their EPR requirements into “approved body” licences as appropriate;
- Develop national action plan for each EPR;
- Undertake annual review and detail auditing of EPR systems and schemes;
- Timely and transparent publication of reports across all systems;
- Set up an independent body or existing government agency to monitor and govern same.

How do EPRs help Ireland achieve our targets?

Response:- EPR Schemes on behalf of their widespread industry membership have encouraged investment in national recycling and waste collection facilities and manage widespread communication campaigns driving awareness and consumer engagement in their dedicated streams. Irish Extended Producer Responsibility (EPR’s) schemes provide data capture systems to measure they volume/amount goods - tyres/packaging/WEEE, etc their producers place on the State market, They also raise awareness amongst the producer community. They

charge a “membership fee” and with this funding they discharge the obligation of their approved licences by undertaking directly and/or indirectly collection of their members waste and arrange for its subsequent recycling according to European norms.

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

Response:- Make it mandatory at product material specification stage that a percentage has to be recycled content thereby closing the loop and maintaining where practical reuse and many lifetimes, etc. To prevent distortion of the internal market and this should be aligned and harmonised with European eco-design regulatory developments including CEN and CENELEC standard development. CIWM Ireland share fellow stakeholders views such as community groups, who are seeking greater engagement with the design and manufacturing sector to connect their communities with operators handling their products at reuse, repair or recycling stages. They also encourage in line with European Commission efforts to develop consumer labelling showcasing the durability and repairability of products.

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

Response:- Given our earlier answer by disincentive for the use of non-reuse/recyclable product/material and the objective to drive towards net zero carbon.

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?

Response:- Mandatory EPR scheme for mattresses. Opportunities to introduce EPR schemes for mattresses, furniture, paint and textiles (amongst other areas) should be reviewed, but with a strong focus on prioritising waste prevention and reuse activity as well as hazardous waste management and resource recovery. New EPR systems should ensure financial responsibility that supports environmental management across wider Circular Economy activity not just recycling.

Is there a role for voluntary agreements with industry?

Response:- In an ideal world, Yes. But experiences have shown that in Ireland where voluntary EPR systems operated, that without some statutory backing, they ultimately are not effective. e.g. the previous voluntary waste tyre scheme (TRAC’s). Today with mattresses, a mandatory scheme is required because the current take back approach (non-EPR) by retailers is not capturing enough mattresses and does not all collect fees that adequately cover the cost of recycling. It is reported that it is not clear how a voluntary scheme could improve.

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

Response:- A one stop shop national body with powers to require change.

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?

Response:- Unknown, but it is worth exploring if retailers may need to become receivers as well. Backhauling a resource and owning the resource brings it closer to a real EPR system, and so the value can be retained. This in turn should drive better design for reuse or recovery. This may need waste management and transport of these materials to be revised.

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?

Response:- None at this time.

16.5 Consultation Questions - Waste Enforcement

What, in your view, are the factors leading to waste crime (please tick one line). See green highlight.

- Ineffective enforcement by the authorities
- Ineffective Penalties
- Waste Market Factors
- Lack of Awareness
- Other (Please Specify)

What measures are required to respond to the links between waste crime and other forms of serious criminal offences, such as organised crime?

Response:- Ineffective enforcement and penalties. Recent investigations undertaken by RTE and others demonstrate as much.

Reference: <https://www.rte.ie/news/investigations-unit/2018/0524/965728-irelands-wild-waste/>

<https://www.rte.ie/news/politics/2018/0619/971648-illegal-dumping/>

<http://mural.maynoothuniversity.ie/9578/>

<https://static.rasset.ie/documents/news/epareport.pdf>

What changes could make the regulatory or industry response to serious and organised waste crime more effective?

Response:- Increased awareness as to the real cost of the environmental damage caused by such crime. As citizens we all bare the cost and dangers of these actions.

Are the penalties available under the Waste Management Act appropriate?

Response:- No. There should not be one size of fine for all. It should be proportional to the damage done and the turnover of the company, Director, etc. taking on board the clean-up costs (if any).

What other penalties could be considered for illegal dumping by households/members of the public

Response:- Issue of Fixed Penalty Notices (FPN's) that may be escalated on the seriousness of the offence to an court hearing. Enforcement of existing legislation and a scale of sanctions leading to custodial sentences may help to raise awareness.

Are there examples of existing good practice to prevent illegal dumping?

Response:- Use of CCTV, Community Neighbourhood Watch's, See it, say reporting culture.

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

Response:- Not sure how this will fit's with polluter pays principle. The regulated industry pay already through licencing and permits.

Should financial provision be a requirement for permitted waste facilities?

Response:- Yes. A bond to cover costs of risks of abandoned sites, etc.

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?

Response:- None this time.

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?

Response:- Yes. Refer to our answer to question 14.1. The waste management industry in Ireland is based on an strong business like footings where good reliable up to date data is essential to ensure associated financial risk can effectively be undertaken to deliver cost effective infrastructure and markets. They regulatory authorities and policy makers would get comfort from earlier signposts on waste flows are being managed as if on track or not. This

may allow informed corrective action to be undertaken as opposed knee jerk, ill-informed actions.

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

Response:- As mentioned earlier, there are many stakeholders having data or the ability to influence change behaviour to enable corrective action be undertaken. However, there is no one single body where one can go to seek one answer to an query or business proposal. This is ineffective and stifles growth in the industry and is most definitely a barrier to creation of a sustainable Irish Circular Economy. With the advent of Computer Information Technology (CIT) and systems the real time sharing of waste flow information should be possible via secure portals. Cost of implementation is an issue (this could be levied as part of the licence or exemption fee), but the responsibility should lie with the EPA or a national governing body.

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

Response:- With modern CIT and systems data sharing and management is now readily possible. Granted validation checks need to be undertaken, but with inbuilt data control points (sanity checks)/algorithms this could enable near enough real time data to be released via secure portals to authenticated stakeholders with a caveat that data is draft and subject to final validation. At the moment various data models are used to fill the this information gap based on actual two year old data at times. CIWM Ireland suggest that this will lead to be practice as all stakeholders will or should follow national data flows to make informed business decision as required.

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

Response:- Yes. To give proper effect to the principle in the Waste Management Act that the first person to discard the material/product is responsible.

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

Response:- Yes, in a free waste market scenario commercial sensitivities are associated with waste flows and markets used. Competitors can use this information to gain advantage at little or no cost nor risk to them.

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

Response:- None at this time.

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

Response:- Waste markets are by their nature are dynamic and subject to national and global market forces. The data will enable the waste industry in the State to better plan and take financial risk. It will enable the regulatory bodies to be better informed as to progress towards targets achievements with greater comfort and a time window to undertake corrective action as required. It should help identify fraud more quickly; it should be available as a resource for strategic planning and communication of targets achieved.

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

Response:- Financial penalties proportional to the risk, suspension of licences, etc.

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

Response:- Yes. But they take on the risk the cost and that it may not be fit for purpose when the legislative changes are made.

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?

Response:- None at this time.

18.6 Consultation Questions - Research & Innovation

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

Response:- CIWM Ireland are aware that EU Commission has published a paper on the Circular Economy (CE) Research and Innovation that attempts to examine the whole cycle of the CE such as production, consumption, waste management and secondary raw materials. Their joined thinking approach is great (p7 – Practical Solutions). CIWM Ireland are of the view all areas are needed to be measured, analysed and evaluated together with no one being more important than the other so that a pragmatic and balanced view in how to best embrace an CE ethos into everyday living may be achieved.

Reference:

https://ec.europa.eu/programmes/horizon2020/sites/horizon2020/files/ce_booklet.pdf

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

Response:- On a State by State basis each should examine its own manufacturing and consumption base of utilisation of resources. CIWM Ireland are aware that the Irish

Manufacturing Research (IMR) Council have set up a stakeholder committee to examine this. CIWM Ireland have volunteered to participate in any future work of their circular manufacturing platform. CIWM Ireland think this is the right way to go and share information (non-commercial) and knowledge to close the loop referred in the paper detailed in the response earlier. There are other areas as previously mentioned such as waste data flows, etc., that need research and study. A carbon database needs to be established to help move Ireland move to net zero.

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

Response:- Conflicts of interest and cost benefit awareness that the research may offer no profitable or breakeven return with certain waste resources.

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

Response:- Yes. As a stakeholder on behalf of our professional members CIWM Ireland invariably find out about events via our networking. There is no one single portal for information that CIWM Ireland are aware of. A single body is required to co-ordinate all stakeholders work/interests in this area to help deliver the CE for Ireland of which waste and resource management is an integral part.

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

Response:- Communications and relevant VAT breaks or other tax incentives could be developed and promoted.

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?

Response:- None at this time.

19.7 Consultation Questions - Consumer Protection & Market Monitoring

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

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

Response:- CIWM Ireland support the recommendation of the CCPC in their report to establish an economic regulator and that all the State's resources are co-ordinated to deliver optimal outcomes for the market.

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

Response:- As waste and resource management is very important subset of many other challenges such as the creation of a Circular Economy and Climate Change management that will be linked to economic measure, CIWM Ireland are of the view it should be a waste regulator to harness together all the many facets of the diverse industry to act as a one stop shop and utilise synergies.

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

Response:- New office set up.

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

Response:- Yes, the waste economic regulator should have control of all aspects, including oversight of customer complaints or be part of an appeal chain.

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

Response:- Yes, Implement one system of measurement such as per weight with simple metrics and not the large range of variable metrics that there is now.

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

Response:- Yes. As without this independent body there would be little or no oversight of household charging on a near national basis.

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

Response:- Yes. The household collection industry will continue to require oversight.

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

Response:- Yes.

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

Response:- Yes and as per the CCPC recommendations.

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

Response:- Yes.

If yes, what powers would such a body have?

Response:- To impose financial penalties, object to licences renewals for continued breach's and if warranted seek suspension or withdrawal of licences/permits.

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

Response:- Yes. Makes sense.

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

Response:- Unknown at this stage.

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

Response:- None at this time.

20.7 Consultation Questions - Green Public Procurement (GPP)

What are the barriers to public authorities using GPP?

Response:-

- A lack of training in the area;
- A lack of understanding in how to include objective tender award criteria in this area;
- A lack of training in how to consider lifecycle costs in such matters.

How can business support more widespread use of GPP?

Response:- Whilst GPP is a process where public authorities will acquire goods, service or work with a reduced environmental impact this onus is not on private business yet. However, where public private partnerships occur it should be a requirement that all partners adhere to

the principle and follow the guidelines and examples per the National Action Plan – Green Tenders.

What % target should apply to the use of GPP in Ireland?

Response:- How long is a piece of string? With up to eight public sectors area's across diverse procurement needs and materials there is not one size fits all to be fair. Where practical and pragmatic % targets should be maximum and evidence presented to demonstrate the methodology's to achieve this. Targets should consider not just the green credentials but the functionality of products bought that they are long lifetime where practical and that then can be reused and have other life/uses. They should consider the life cycle and economic impact of the products.

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our green public procurement practices?

Response:- How about a league table to such like for public bodies to demonstrate in their annual reports where they are at, where they want to go and how to get there.

References: <https://www.dccae.gov.ie/en-ie/environment/topics/sustainable-development/green-public-procurement/Pages/default.aspx>
<https://www.dccae.gov.ie/documents/Green%20Tenders%20-%20Action%20Plan%20on%20Green%20Public%20Procurement.pdf>
<https://www.gov.ie/en/circular/Circular-20-2019/>
<http://www.epa.ie/pubs/reports/other/corporate/olg/GreenPublicProcurementfinalwebv2.pdf>

21.7 Consultation Questions - Household Bulky Waste

What supports do consumers require to prevent bulky waste?

Response:- PRI's for bulky furniture items such as mattresses, tables, sofas etc on a model similar to that of the WEEE model. To date, Irish EPR schemes have strongly supported recycling but provided only very limited support to prevention or preparation for reuse activities. As a result, recycling (through subsidies) has become more viable than these other activities. Opportunities to introduce EPR schemes for mattresses, furniture, paint and textiles (amongst other areas) should be reviewed, but only if there is a strong focus on prioritising and financially contributing to prevention and preparation for reuse activity.

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

Response:- In the current arena of climate awareness should consumers not be expected to pay the true costs including end use recovery costs of the items that they purchase.

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

Response:- If the market determines that there is an opportunity in economic terms and that an environmental issue can be resolved and perhaps also creates employment, then there needs to be a mechanism of some description which can entice the private market to consider such opportunities, through funding. This is an area that merits further consideration by Government.

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?

Response:- Nothing to add at this time.

22.5 Consultation Questions - Bio economy

What kinds of activities to increase the financial support for bio economy development in Ireland?

Response:- CIWM Ireland understand from the Department of Business, Enterprise and Innovation paper on “Realising the opportunities for enterprise in the bio economy and circular economy in Ireland” for these to be the bio economy value chain as shown on p.7 in the schematic overview. The sectors identified in Ireland are; Food, Forestry and marine; Biomaterials and Biochemical’s; Bioenergy and biofuels and Mechanical Circular Economy. Productivity is a key factor to be considered and innovation will be an integral part of offering solutions to deliver CE and Bioeconomic that do not entirely complement each other.

Reference: <https://dbei.gov.ie/en/Publications/Publication-files/Realising-opportunities-for-enterprise-bioeconomy-and-circular-economy-Ireland.pdf>

Are current policy options in relation to innovation & enterprise policy instruments suitable or sufficient to address the development of systemic and cross-cutting bioeconomic approaches, business models and new value chains?

Response:- From the conclusions of the above paper, it’s a start – Ireland are part of a bigger global picture that needs to be considered.

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

Response:- Have a one stop shop to ensure joined up thinking and synergies.

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?

Response:- None at this time.

End of submission.