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Waste Action Plan Consultation
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Dear Sir/Madam,

Enrich Environmental Limited wishes to contribute to the public consultation by way of the following comments.

Section 2: Institutional Arrangements

Question:- How are the current institutional waste prevention and management arrangements working and how could they be improved ?

Answer:- The current Institutional arrangements are not working as effectively as they should be in order to rapidly develop the circular economy that is needed to develop a low a carbon resource efficient economy If Ireland is serious about developing the circular economy a dedicated unit within the Department of Environment should be established. This new unit would coordinate research, regulation and policy across all sectors.

Local authorities are responsible for regulating a large number of waste permitted sites across the country. The manner in which such regulation is implemented is not consistent with that of the EPA, thus giving rise to a two tiered system. A single regulatory body for all waste activities should result in a better system and avoid issues falling between two stools.

As custodians of the Irish environment the EPA should have a clear overarching policy on how all activities under its remit align with achieving Ireland's climate change targets. This should be modelled on the Scottish EPA's Regulatory Strategy – One Planet Prosperity.

Section 3.8: Household Waste

Question:- Is incentivized charging working in your opinion? Are households being financially incentivized to prevent waste and recycle correctly through the three bin system?

Answer:- No the current system is not working. The policy of pay by weight needs to be fully implemented for all waste collection.

Question: - What role should Civic Amenity Sites play? Should there be a standard service across all Civic Amenity Sites such as waste streams they accept. Should CA sites accept general waste or only recyclables? Should CA sites be used to provide reuse opportunities areas dedicated to exchange and upcycling? If so, how should this be funded.?

Answer:-

Civic Amenity sites have a key role to play in the improving the management of waste and the reduction in illegal dumping by householders.

Civic Amenity sites are the only place where people can deliver many types of bulky waste, furniture, paint, oils, wood, garden waste etc and Local Authorities should be obliged to ensure that CA sites are available within a reasonable distance of everyone living within their area.

They should accept all types of waste including general waste and this acceptance criteria should be consistent across the country.

They should have appropriate space to encourage exchange and upcycling. This service could be funded by levying a small payment for goods acquired.

3.9 -Commercial Waste

Question :- How could pricing structures for commercial waste be improved to incentivize better segregation and recycling of waste? For example should pay by weight be introduced for commercial waste?

Answer:- Yes Pay by weight should be mandatory for all waste collection

Question:- Other Comments?

Answer:-Garden Waste from commercial customers provides valuable feedstock for the composting industry. Currently there are a lack of drop off facilities for such commercial waste. From our experience the waste authorisation required for such drop off centres acts as a significant barrier to the development of these facilities. The acceptance and storage of garden waste pending off site removal should be authorised under a certificate of registration rather than a waste permit. This would increase recycling rates and help mitigate against green waste being dumped illegally

Section 4 Food Waste

Question:- Any other comments ?

Answer:- Identify the regulatory and/or legal barriers to redistributing food both from central distribution depots, and retail outlets and work to remove these.

There is considerable evidence that current use by dates and best before dates and the practice around managing products shelf life is leading to foodstuffs being discarded unnecessarily. An alternative labelling system should be considered which ensures food safety but prevents food that is safe for human consumption being discarded.

Consideration should be given to food waste only collection systems in urban areas coupled with a good network of drop off locations for green garden waste. The use of small receptacles for food only waste collection should improve contamination rates and the cost to consumers should fall as the costs of processing source segregated garden waste is lower than processing mixed food and garden waste.

Section 7 Circular Economy

Question :- Any other comments ?

Answer: - There are a number of areas that could be transformed under the circular economy

- a) Residual waste could be used as an alternative fuel in the peat fire power stations that are being closed down. Currently this material is being exported for power and heat generation

in other European countries. Last year approximately 300,000 tonnes were exported at an average price of €80 per tonne. This equates to a loss of €24 million per annum.

- b) Similarly waste wood is currently exported for use as a fuel, this could be retained in Ireland and used in the place of peat
- c) Construction and Demolition waste contains a large proportion of concrete and aggregate, with appropriate standards and regulation this should be reused in place of virgin aggregate
- d) Organic waste can be composted or processed through anaerobic digestion to produce a soil conditioner to remediate land and improve soil health.

The Regulatory and Legislative barriers currently in place which restrict the ability to create a circular economy for these waste streams need to be addressed. Financial Incentives will also be required to adapt existing power stations to handle waste. Tax incentives should be considered where appropriate to encourage commercial activity that promotes the circular economy.

Section 9.0: Construction and Demolition Waste

Question:

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

Answer:

- (a) A clear specification must be developed for the production of aggregate
- (b) To ensure a market for secondary aggregate all new projects should be required to use a certain proportion of secondary aggregate
- (c) Clearer criteria for end of waste applications – see response to Section 13
- (d) Incentives should be introduced to promote the co firing of waste wood to replace peat and/or coal

Section 12: By Products

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

Answer: The assessment and response to applications should be done in a more timely manner. This process could be made more efficient by setting up an online application system with active feedback.

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

Answer: Yes, but subject to an overhaul of the current system.

Question: Have you any other comments

Answer: - We have severe reservations about giving the Local Authorities a role as it will result in inconsistencies and confusion as inevitably different Local Authorities will adopt different approaches

Section 13: End of Waste

Question: 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?

Answer: Yes

Question: If yes:

- what expertise would be necessary for such a team,

- who should be represented,
- are there other materials which you believe are suitable for national end of waste decisions?

Answer: The team should be made up of industry experts with experience in the industry producing the waste, industry experts with experience related to the proposed end use for the waste if EOW is granted, environmental scientists and academic experts to assess potential for adverse environmental impacts and also the potential environmental benefits granting EOW.

Question: Any other comments?

Answer: Currently the response to EOW applications can take over a year. The onus is placed on industry to apply for EOW but the slow assessment and response process by the EPA discourages applicants. The EPA should take a far more proactive role in EOW if we are to move towards a circular economy. The EPA should offer an initial consultation with applicants. This consultation should be used to set out the key points and parameters to be addressed to achieve EOW for a specific material. The EPA should be able to tell the applicant what specific concerns need to be addressed for the material, especially for the requirement to prove there is no adverse environmental impact, which can be a very wide-ranging challenge without guidance.

Section14: Exemptions

Question:- 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 Plant Species?

Answer:- On-site controlled incineration of Invasive Plant Species should be permitted under an exemption. The risks and environmental impact associated with transporting this material long distances far outweighs those related to on-site treatment.

In addition, the high costs associated with the moving of such species to a few small number of facilities around Dublin often result in such material disappearing thereby encouraging its spread. If legitimate on-site cost-effective options exist it should give rise to improved management.

Section 16: Waste Enforcement

Question:- What in your view, are the factors leading to waste crime:-

Answer:- While all the options listed contribute the single biggest factor is the very significant money to be made or saved by failing to manage waste legally.

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

Answer: - A specialised unit with the Gardai/Criminal Assets Bureau to work side by side with waste enforcement personnel.

Question:-Are the penalties under the Waste Management Act appropriate.

Answer: - No. The penalties should take account of the monies made or saved by the illegal activity. There are very large sums of money involved and the fines currently being imposed are not a deterrent. In certain cases where large fines were levied these were reduced on appeal. To give an example, one load of waste costs over €2,500 to dispose of legally, a rogue operator who can “lose” ten loads can save €25,000. Such rogue operators will be doing this on a weekly basis. If caught they might face a fine of a couple of thousand euro at most. To be effective penalties should be a multiple of the monies saved and the cost of clear up. This should also be the case for illegal activity by householders.

Question :- Any other comments



Answer: -Currently, waste enforcement is managed by local authorities and the EPA. There is ambiguity created by this two-tier system and inconsistency in approach. This needs to be addressed. There is also situation where unauthorized/unregulated sites exist which are not subject to environmental compliance regulations. These sites pose the greatest risk to human health and the environment, yet the EPA does not intervene unless a complaint has been made against the local authority. The reality is the polluter does not pay. The EPA needs to focus as much of its resources on dealing with unauthorised/unregulated activity as it currently does on licenced sites. While it may not be a fair reflection on the work they do, from an industry perspective the EPA appears often to be more concerned about public perception than about environmental risk.

Yours faithfully

Tim Duggan
Managing Director