

Administrative Officer,
Waste Action Plan Consultation,
Waste Policy & Resource Efficiency,
Department of Communications, Climate Action & Environment,
Newtown Road,
Wexford,
Y35 AP90

21st February 2020

Re: ICF Consultation Submission on the Waste Action Plan for a Circular Economy

Dear Sir or Madam

Introduction

The ICF is pleased to offer some food for thought in relation to limited Construction and Demolition waste streams, particularly LoW classes 17 05 04 (inert soil and stone), 17 01 01 (clean concrete) and 17 03 02 (bituminous non-coal tar mixtures) as are relevant to the extractive and associated manufacturing industries. Consequently, our comments are restricted to the question raised in Chapter 9 relating to Construction and Demolition Waste.

Chapter 9 Questions Answered

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

Regarding recycling, it is imperative that generalised End of Waste criteria are established for as many classes of waste as possible, as soon as possible. Additionally, Article 27 guidances for materials for By-Product declarations (17 01 01 and 17 03 02) will reduce the material potentially being classed as waste by default. The EoW must include inert soil and stone where often perfectly good material, e.g. gravel, is recovered by deposition rather than processed for aggregates.

2. What existing measures are in place that could be improved?

Within County Development Plans, Regional Planning Guidelines and National Waste Action Guidelines, add C&D Recycling as a necessary integral element of all extractive industry development applications. As these sites are most suitable for handling such waste streams, with substantial synergies, the inclusion of such processes maximises the sustainability of future extraction.

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

Existing waste facility regulations whereby all waste is added to cumulative tonnage, where inert soil and stone recovery is the principal activity, should be revised and accurately reflect the wastes recovered, with flexibility on stream tonnages within the approved overall annual throughput. The current application of

the Waste Regulations is inflexible and deliberately controlling for no apparent benefit, and needs in-built pragmatism and flexibility to reflect market year on year requirements.

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

There are plenty of existing markets for recycled aggregates which will come into play when the EoW criteria and Article 27 guidances are complete. The streams referenced above can be easily accommodated back into new product manufacture (17 01 01 and 17 03 02 especially but also 17 05 04) and site restoration (just 17 05 04).

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

No, the available recycled concrete and allied waste streams would only supply 2-3% of national aggregates demand if all were recycled, and recycled aggregates are particularly suitable as low grade fill, where the aggregate provenance is unknown; higher value products can include recycled material where the provenance is known. Adding 2-3% to the available reserves can be easily absorbed into the construction sector. Applying a levy to aggregates would be counter-productive and increase construction costs to all projects, way beyond what recycled aggregates could service. Additionally, without absolute enforcement, adding a levy would merely create a 'black market' to an existing industry and otherwise distort supply.

Ireland does not have the industrial base to generate a significant amount of additional supply through recycled aggregates, and there are fundamental differences in geology and supply availability compared to the UK market where such levies have been applied.

6. 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?

Mixed waste should be levied, and clean waste, such as the referenced waste streams, exempted to create a big enough incentive at that stage in the construction cycle. This would also simplify the management of the basic waste facilities (handling 2/3 stream wastes), and encourage more sites to become involved.

7. What are the best approaches to raising awareness and education?

See 6 above, cost is generally the best driver. A national awareness programme supported by a small number of industry associations would greatly increase awareness.

8. What are the barriers/enablers to these measures?

There appears to be insufficient resources at local authority level to audit, routinely inspect and enforce at the site of waste origination; this might be addressed. Improved and detailed Waste Management Plans in permissions for developments would assist in providing a legal basis for site audit and inspection.

9. 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?

In relation to C&D, the extractive industry can easily provide sufficient sites to accommodate the main waste streams, such as soils, concrete and macadam wastes, using existing sites with infrastructure and environmental management systems in place. Such streams are most easily integrated back into fresh production to maximise synergic value and sustainability.

Conclusions

It is hoped that the brief comments above have been constructive and highlighted some key issues which currently hold back the extractive industry from committing to universally adopt waste streams as an integrated aspect of aggregate production.

The ICF would welcome an opportunity to meet with DCCAE and better explain the industry's views and inherent existing capacity to assist with the major C&D waste streams on existing operating extractive sites with downstream manufacturing facilities.

I look forward to hearing from you in due course.

Yours faithfully,



Liam Smyth

Senior Manager – Regulatory Compliance