



**IRISH FARM FILM PRODUCERS' GROUP**

**(IFFPG)**

**Submission**

**on**

**Waste Action Plan for a Circular Economy**

**February 2020**

## CONTENTS

<b>Section</b>	<b>Page Number</b>
Background.	1
Sections 5. Plastic and Packaging Waste	1-2
Sections 6. Single use Plastic	2
Section 7. Circular Economy	3
Section 8. Citizen Engagement – Awareness and Education	4
Section 15. Extended Producer Responsibility (EPR)	5-6
Section 16. Waste Enforcement	6-7

## **BACKGROUND**

The Department of Communications, Climate Action and Environment (DCCA) is developing a new Waste Action Plan for Ireland as part of the transition to a circular economy and has invited submissions from interested parties through a public consultation process.

IFFPG, the national farm plastics extended producer responsibility (EPR) scheme, welcomes both the announcement of a new national Waste Action Plan which will prioritise circularity and the opportunity to contribute to its development.

In this submission, comments are primarily focused on topics of relevance to the plastics recycling sector, with topics dealt with in the order that they are laid out in the consultation paper.

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## **SECTION 5 - PLASTIC AND PACKAGING WASTE**

### **General**

The issue of plastic and packaging waste was dramatically brought to the public's attention recently through the Blue Planet documentary series, which highlighted the scale and extent of the worldwide problem of marine litter. Subsequently, a range of EU, national and voluntary led initiatives have been launched to reduce the marine litter problem through the more sustainable use of plastics resources.

While IFFPG is responsible for recycling exclusively non-packaging plastics waste, its sister company Farm Plastics Recycling CLG which is a commercial entity, recycles plastics packaging waste (fertiliser bags, feed bags & agri-drums).

### **Specific Comments**

- While it is considered that Ireland's current plastic packaging recycling rate (34%) is satisfactory, new targets (50% by 2025 and 55% by 2030) must be viewed as very challenging within the context of both a growing population and economy
- It is considered that new targets will only be met through the concerted efforts of all key stakeholders, with the Government, Repak, the Environmental Protection Agency (EPA) and the waste industry having particularly critical roles to play
- It is considered that the transposition of the Single Use Plastics Directive into national law will assist in reaching targets through the banning of some packaging wastes, the establishment of new EPRs and a general increase in public awareness
- It is considered that a reduction in current high levels of contamination in household and commercial recycling bins would by itself increase recycling rates. It is considered that contamination detection technology which is being trialled by the waste industry (photographs the contents of bins as they are being emptied), may have a role to play in this regard with customers initially warned and later penalised for incorrect usage of bins
- It is considered that it may be necessary to examine expanding the range of plastic waste types that are currently accepted in the household recycling bin
- It is considered that the possible use of Deposit Return Schemes (DRS) should be examined as specific plastic packaging recycling targets, e.g. for PET bottles, may not be achievable in their absence

- It is considered that the effective introduction of eco fee modulation will particularly support recycling through making packaging waste more readily recyclable and through increasing demand from plastic recyclers for plastic waste
- It is considered that the on-going examination of the reasons behind Ireland's relatively high levels of plastic packaging usage should be continued, with it considered unlikely that usage patterns in Ireland are in any way radically different to those in other similar type European countries
- The possible introduction of an EU driven Own Resource Tax (Plastics tax) on plastic packaging which is not recycled makes it all the more critical that data collection methods employed are accurate
- It is also considered that increasing Repak subsidy levels will have the desired impact of significantly stimulating increased collection rates. For example, Farm Plastics Recycling CLG used recent increases in REPAK subsidy levels to reduce collection charges to farmers and increase recycling levels by over 25%.

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## **SECTION 6 – SINGLE USE PLASTIC**

### **General**

IFFPG considers that the transposition of the SUP Directive into national law by 3<sup>rd</sup> July will assist in achieving the twin objectives of reducing marine litter and enhancing plastics resource efficiency.

### **Specific Comments**

- It is considered that the banning of a range of single use plastic products such as cutlery, plates, cotton bud sticks etc. will reduce current marine litter problems
- It is considered that the establishment of new EPR schemes for balloons, wet wipes, fishing gear etc. will not only decrease littering but increase recycling levels. IFFPG is available to share its experience and expertise with sectors that will be tasked with establishing new EPR schemes
- It is considered that separate recycling targets for PET bottles of 77% by 2025 and 90% by 2030 are challenging and recommends the exploration of various collection methods, including DRS, to ensure target achievement
- In the case of single use beverage cups, it is considered that a combination of levies, retailer rewards for customers who use reusable cups and a focused public awareness campaign is likely to result in reduced usage
- In relation to promoting increased recycled content usage, this is considered highly desirable not only for plastic bottles but all plastic products. However, it is considered that there are currently many factors that impinge on meeting this objective. They include the lack of recyclate available (in some cases making it expensive), the poor quality of some recyclate and lack of recognised standards European standards for recyclate, as well as a reluctance by some producers to use recyclate due to quality concerns. For its part, IFFPG is currently exploring the possibility of using recycled content as a possible criterion under eco fee modulation to encourage its greater usage by farm plastics producers.

## SECTION 7 – CIRCULAR ECONOMY

### General

IFFPG supports current EU, national and voluntary led initiatives to boost the circular economy, in particular in relation to plastics resources.

### Specific Comments

- It is considered that the adoption of a closed loop approach to the use of plastics resources through a range of regulatory actions and voluntary initiatives is urgently required
- In the case of plastics, the speedy implementation of appropriate circularity initiatives is considered especially critical to ensure that we meet increasing recycling targets, improve resource efficiency and reduce marine litter
- It is considered that achieving a significant increase in the use of recycled content in new plastics products is essential as it will result in increased demand from recyclers for plastics waste, which in turn will stimulate increased collection rates
- It is considered that the Circular Plastics Alliance (CPA), which was recently established by the European Commission to promote increased recycled content usage in new plastic products, will have a particularly crucial role to play in this regard. The CPA, whose signatories include many of the leading brand holders and recyclers in Europe, is committed to increasing recycled content in new plastic products from the current 4 million tonnes to 10 million tonnes by 2025. IFFPG is a signatory of the CPA and is also a member of the Agri-plastics Working Group which is focused on increasing recycled content in farm plastics products
- It is considered that plastics EPR schemes, who already play a critical role in supporting the circular economy, can further assist through effectively introducing eco fee modulation. Eco fee modulation, which is a requirement of the Waste Framework Directive, obliges EPR schemes to take into account other factors apart from volume of product placed on the market when charging producers. For example, factors such as recycling costs, recyclability and recycling rates associated with products must in the future also be taken into account, with producers who place environmentally friendly products on the market charged less than those who do not
- It is considered that while waste prevention initiatives are highly desirable, they can be difficult to identify and implement. In the case of plastics, implementation of the SUP Directive will undoubtedly result in waste prevention through the banning of some products and the possible introduction of levies on others. Resulting plastic reductions should be readily quantifiable and possibly subject to targets
- In the case of the farm plastics sector, considerable light weighting of products has already been achieved and it is considered that very little further progress can be made without compromising the performance of products. In terms of reuse, silage pit covers are the only farm plastics product which can be reused, with the majority of pit covers currently reused before being made available for recycling. Other farm plastics products, such as silage wrap, netting and twine are not fit for reuse (too damaged after use)
- It is considered that an expanding recycling sector should also generate economic benefits. The recent opening of a new farm plastics recycling facility in Littleton, Co. Tipperary, with a potential throughput of 20,000 tonnes of material per annum and the creation of 40 jobs is a good example of how circularity can produce economic benefits for Ireland.

## SECTION 8 – CITIZEN ENGAGEMENT – AWARENESS AND EDUCATION

### General

IFFPG considers that effective citizen engagement is crucial to ensuring that national recycling targets are met. This is considered particularly relevant when it comes to achieving new challenging plastic packaging recycling targets.

### Specific Comments

- It is considered that that significant progress has been made to date in relation to effectively communicating waste management messages to the public as demonstrated by the achievement of impressive national recycling rates, for example, total packaging (65%) household waste (50%) and plastic packaging (34%)
- It is considered that well-funded Government led campaigns of the early noughties that operated under engaging slogans (“Race Against Waste”, Reduce Reuse Recycle”) played a key role in bringing about these results
- However, it is clear that for current waste challenges to be met (increasing targets and high levels of incorrect waste bin usage) that a new well-funded national communications strategy is vital for the duration of the next Waste Action Plan
- It is considered that the new communications strategy, which should be Government led with the support of all the main players, should operate under an engaging slogan(s) that allows the public to both understand what is meant by the circular economy and to easily identify ways by which they can support the circular economy
- It is considered that the strategy should be well funded by the Government in the first instance, with the other main players also contributing
- It is considered that increased expenditure on communications can be considered as money well spent as it will help prevent possible EU penalties at a later stage due to not reaching waste management targets
- It is considered that an expanded mywaste.ie represents an ideal vehicle for the delivery of a new national communications strategy
- It is also considered that the waste industry has a critical role to play in effectively communicating to their customers correct bin use procedures
- In the short term, it is recommended that waste collectors should routinely remind customers of how to correctly use their waste bins through a variety of methods (stickers on bins, text messaging, emails etc.)
- In the longer term, it is considered that the use of contamination detection technology by waste collectors combined with clear customer feedback (warning letters followed by penalties) may have a role to play in significantly improving bin usage practices
- In the case of plastics packaging, it is considered that communication efforts with the public should be redoubled to ensure that only rigid plastics are deposited in the household recycling bin
- In terms of the farm plastics sector, effective communications with farmers has been key to ensuring that IFFPG consistently achieves a 70% + national recycling rate
- IFFPG communications strategy is increasingly incorporating digital media as part of its communications strategy with farmers. For example, the scheme advertises on popular farming websites, as well as using Facebook and Twitter to make farmers aware of their local bring-centre. In addition, IFFPG widely uses SMS to provide farmers with texted information in advance of their local bring-centre.

## SECTION 15 - EXTENDED PRODUCER RESPONSIBILITY (EPR)

### General

EPR schemes have to date played a key role in ensuring that Ireland meets its EU and domestic waste management targets. However, increasing targets, as well as new minimum requirements for EPR schemes as stipulated in the amended Waste Framework Directive (WFD), means that EPR schemes must make an even greater contribution in the future.

IFFPG, which was established in 1998 and is a not for profit body, is the national farm plastics EPR scheme and recycles non-packaging farm plastics waste. IFFPG's sister company, Farm Plastics Recycling CLG which is a commercial entity, recycles packaging farm plastics waste.

### Specific Comments

- It is considered that the EPR scheme model in Ireland consistently delivers outstanding environmental results on behalf of participating sectors
- In the case of IFFPG, our rural environment is protected and circularity is supported through:
  - Recycling approximately 30,000 tonnes of farm plastics waste annually
  - Consistently exceeding the 70% national recycling target (78% recycling rate for 2019)
  - Achieving the above within the context of a growing farm plastics market (20% increase in the last 7 years due to the abolition of the milk quota and better grassland management)
  - Providing a comprehensive collection service to farmers with 235 bring-centres held annually (average distance that farmers travel to bring-centre is only 9 km), as well as a farmyard collection service
  - Providing a service to 85,000 farmers (70% of all livestock farmers)
- It is considered that IFFPG's funding model is sustainable and involves producers providing 75% of funding requirements through a recycling levy, with farmers contributing the remaining 25% through a weight-based collection charge
- It is considered that as the setting of charges is a reserved function of the board of IFFPG and since IFFPG's board is representative of all the key stakeholders (producers, farmers and independents), that the process is inclusive and transparent
- It is considered that the establishment of Farm Plastics Recycling CLG in 2010 in response to a demand from farmers for a complete farm plastics recycling service has significantly boosted recycling of farm plastics packaging waste streams (increased from 100 tonnes in 2010 to almost 1,000 tonnes in 2019)
- It is considered that additional minimum requirements in the amended WFD in relation to EPR schemes should be broadly welcomed. They include the need in future for producers to contribute all or the majority of costs associated with operating an EPR scheme, that costs should be no more than is necessary and should be transparent, the introduction of eco fee modulation which will see producers charged based on the environmental friendliness of their products in addition to the volume of product that they place on the market, as well as the equal treatment of producers regardless of their origin or size
- In particular, it is considered that the eco fee modulation requirement has the potential to significantly support the circular economy by rewarding producers through reduced fees for products placed on the market that take into account factors such as durability, reusability, recyclability and recycled content

- It is considered that eco fee modulation has the potential to positively impact the farm plastics sector and IFFPG is currently actively exploring options in this area
- In the case of new EPR schemes that will be established under the SUP Directive or under any other legislation, IFFPG is available to share its experience and expertise
- With regards to the use of voluntary agreements to establish EPR schemes, it is considered more likely that EPR schemes with the support of legislation will succeed
- In the case of plastics packaging, Repak working with its key stakeholders has a critical role to play in ensuring that we increase our recycling rate from the current 34% to 50% by 2025 and 55% by 2030 (See Section 5 – Plastic and Packaging Waste).

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## **SECTION 16 – WASTE ENFORCEMENT**

### **General**

Improved enforcement in recent years has resulted in significant reductions in large scale illegal management of waste and associated environmental benefits. However, the problem of small-scale illegal management of waste, exacerbated by the sometimes involvement of a criminal element, persists.

In the farm plastics sector, producers who initially place specific farm plastics products on the Irish market are legally obliged to contribute to recycling costs through either being a member of an EPR scheme or through self-compliance (Farm Plastics Regulations). While compliance levels are currently high, the problem of product being placed on the market without the recycling levy can sometimes arise, in particular in the border region. It is the responsibility of the local authorities to enforce legislation in this area.

### **Specific Comments**

- It is considered that the National Waste Enforcement Steering Committee and the Waste Enforcement Regional Lead Authorities have played a key role in reducing large scale illegal waste management in recent years through bringing about a more co-ordinated and strategic nationwide approach
- It is considered that the adoption of a multi-agency approach, which often involves enforcement officers working with an Garda Síochána, Revenue Commissioners and the Department of Employment Affairs and Social Protection, has proved particularly effective at dealing with illegal waste activity that has a criminal element
- It is considered that Government funded anti-dumping initiatives (with a voluntary involvement if possible) should be continued as they have delivered tangible results in relation to clearing fly tipping black spots
- It is considered that any measures that enhance the capacity and responsibilities of the WERLAs, improve the funding of local authority enforcement measures, identify the cost of waste crime in Ireland, as well as supporting greater multi-agency co-operation should be welcomed
- It is considered that fixed penalty notices represent the most effective way of dealing with more minor illegal activity and measures to see their further use is welcomed
- In the case of the farm plastics sector, it is considered that the market is predominantly compliant at the moment. However, small scale supply of illegal product can occur from time to time, particularly in the border region. This typically involves retailers purchasing

product from Northern Ireland and placing on the market in the south without charging levy or VAT

- It is considered that the annual multi-agency enforcement campaign, which involves IFFPG through its Compliance Officer working in an advisory role with the Connacht-Ulster WERLA and border local authorities, represents an effective enforcement response to the problem. The campaign typically involves the carrying out of 25-30 inspections during the silage making season, with enforcement activities highlighted in local newspapers
  - It is considered that prompt responses from local authorities in non-border areas of the country to reports of suspected illegal supply of farm plastics product is desirable, with prosecutions urged in clear cases of non-compliance
  - As a tool to further assist the activities of enforcement officers in the farm plastics sector, IFFPG introduced a traceability system 10 years ago. The system involves a unique code being applied to new product placed on the market, with farmers who later present the code at collections receiving reduced charges. The code also allows enforcement officers to more easily distinguish between legal and illegal product.
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