

IFA submission

**to the Department of Communications, Climate Action and
Environment's**

**Consultation on the Transposition of the Circular Economy Waste
Package**

and

Consultation on a Waste Action Plan for a Circular Economy

**The Irish Farm Centre
Bluebell
Dublin 12**

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Introduction

As Ireland's largest farming representative organisation, the Irish Farmers' Association (IFA) is making this submission to tackle the scourge of reckless dumping in rural areas and to support improved waste management and a cleaner countryside.

Addressing reckless dumping in rural areas

IFA members across the country continue to report increased incidences of fly-tipping and dumping in the countryside, particularly in recent years with increased economic activity. Packaging waste generated from outside the State, via online shopping is also a significant contributor, with reports of a 33% annual increase of such waste, to 10,000 tonnes.

The materials dumped range from household waste, to used tyres and used building materials. The issue escalates post-Christmas each year, as people recklessly dump cans, bottles, used wrapping paper and even the left overs of Christmas dinners at field access points, in private forestry and along roadside ditches. Some local authorities including Wicklow and Kilkenny have sought to deal with this problem by issuing heavy-handed letters to landowners to clean-up such dumped materials or face fines and court appearances.

IFA proposes:

1. That the national Waste Action Plan (WAP) must require all local authorities to develop plans to address the issue of fly-tipping and dumping in the countryside. The Waste Enforcement Regional Lead Authorities (WERLA's) must take the lead in co-ordinating the development and implementation of these plans.
2. A review of the on the spot fines for littering introduced in 2018, which would include increased fines and the publication of details of those who receive on-the spot fines on more than two occasions.
3. Increased enforcement action by local authorities, as well as tougher sentences and penalties for large scale serial dumpers.
4. That a plan is developed to ensure on-line retailers from outside of Ireland are required to contribute towards the correct management of their packaging materials.
5. That the existing waste management legislation is changed, to remove the current threat of fines and prosecutions of farmers on whose land others irresponsibly dump their litter.

Supporting improved waste management

Farmers in Ireland have a proven track record of good waste management. Their full participation in the Government licenced waste plastic producer responsibility initiative (PRI), IFFPG¹ has resulted in over 30,000 tonnes of silage wrap and pit covers being recycled each year. This collaborative approach to waste management, which brings together key stakeholders provides a blueprint for the management of other waste streams in the agri-food sector.

¹ Irish Farm Film Producers' Group (www.farmplastics.ie)

Farmers have also stepped in where market failure exists in waste management. In 2010 farmers worked with IFFPG and other stakeholders to establish Farm Plastic Recycling CLG (FPR) to support the management of waste streams including fertilizer bags, meal bags and used chemical drums. However, the full levy paid by producers of these waste streams is not paid to FPR.

There was also widespread support for the initial used tyre collection points supported by the Department of Environment and hazardous waste collection points operated by Teagasc, the EPA and Government Departments.

IFA proposes:

- The conversion of Farm Plastic Recycling CLG into a Government licenced Producer Initiative, where those who place products on the market pay their full contribution to the PRIs for waste streams including,
 - meal and fertilizer bags, chemical containers used, waste tyres and hazardous waste materials.
- The extension of the used tyre collection service, to all remaining counties that were not part of the initial collection service.

IFA would like to meet with the Department at the earliest opportunity to discuss these proposals further and ensure that Ireland's Waste Action Plan supports a cleaner countryside and holds reckless dumpers accountable for their actions.