

Waste Action Plan 2020

Submission on Public Consultation Waste Action Plan for a Circular Economy by Repak ELT Company Limited by Guarantee.

Repak ELT welcomes the opportunity to provide input to the Public Consultation Waste Action Plan for a Circular Economy.

Repak ELT is a not-for-profit organisation working under approval from the Department of Communication, Climate Action and Environment (DCCA), to operate the tyre compliance scheme. Repak ELT's mission is to deliver an environmentally sustainable Tyre Compliance Scheme that provides best value for money, establishes visibility and accountability for the final destination of end of life tyres as well as eliminates the illegal dumping of waste tyres on our landscape.

Over 2,600 Members are currently registered with Repak ELT. All tyre operators are obliged to join the compliance scheme and charge the relevant Visible Environmental Management Cost (vEMC) on sales of car and motorcycle tyres. The compliance scheme tracks all tyres coming onto the market, where a vEMC is applied and then passed through the distribution chain. Members are required to report the tyres bought, sold and waste tyres collected.

Over the course of the first year Repak ELT, through its collection network has collected and funded the recycling and recovery of over 3.8 million passenger car tyres, equating to 31K tonnes of tyres taken out of the waste stream. In total 74% of those waste tyres were exported, highlighting the need to treat and/or dispose of wastes in reasonable proximity to their point of generation and to de-risk volatile non-EU markets and to incentivise the circular economy model across Ireland.

2. Institutional Arrangements

Q. How are the current institutional waste prevention and management arrangements working and how could they be improved in your opinion?

- We note WERLAs are currently working well, we recommend that a centralised enforcement function operated through the WERLAs may further improve enforcement.
- Standardised enforcement practices throughout the country. What is best practice?
- We recommend the establishment of a national protocol for enforcement and pathway to prosecution.
- We believe that criteria applied when granting waste collection permit applications should be fundamentally re-examined with a view to introducing stricter approval conditions.

7. Circular Economy

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

We recommend that a working group is established in order to promote the development of infrastructure on a strategic basis.

This group will consider inter alia:

- Identify the problem areas where waste generation is not moving forward.
- Consider new technologies and processes including an incubator hub for developing and trialling new technologies.
- National investment programme for the waste industry including tax incentives to add value to the waste hierarchy.

Q. What measures are required to increase understanding of circular economy principles and their uptake by relevant actors?

We recommend the following actions:

- Develop policy in consultation with the waste industry and their requirements and align it to the National requirements.
- Survey stakeholders to understand the roadblocks in the Irish system when dealing with specific waste streams.
- Roll out a series of national consumer education programmes through EPR organisations and representative bodies of the industry.

11. Waste Management Infrastructure

Q. Should one National Waste Management Plan be produced in place of the 3 current plans?

- We recommend that one plan should be produced, but it can be managed regionally with common KPIs and metrics across the country.

Q. Should the state assist in funding the development of indigenous waste recycling facilities? If so, how should it be funded?

- Yes, we recommend that the state should assist in the development of indigenous waste recycling facilities. This could be funded directly or through a mixture of tax incentives and grant packages. These facilities should be strategically located and have easy access from the road network. Funding levels should be scaled relative to environmental and economic impacts aligned to circular economy principals.

Other comments:

Repak ELT recommend the development of a strategic waste management infrastructure plan takes into account regional waste transfer stations aligned to transportation hubs (Road, Rail, Sea). Technology, planning & access to funding represent key drivers enabling transformational change in the sector.

We believe planning waste management facilities by location and scalability are key drivers to successfully creating a circular economy within the waste industry. Over-reliance on export markets

outside the EU does not represent a long-term solution.

We recommend the standardisation of waste facility permits throughout the country and developing infrastructure in key locations is critical to Ireland managing its own waste.

13. End of Waste

Q. Should the Government seek to establish a group to apply for national End of Waste decisions for appropriate products?

- We believe that the Government should seek to establish a group to apply for national End of Waste decisions for appropriate products. Tyre Modified Aggregates used in multiple applications are suitable for national end of waste decisions.
- We agree with the principle that local authorities should have a role in terms of assessing End of Waste applications from facilities authorised by the local authority, but a standard approach across the country is required. EPR schemes should also be involved.
- We support the introduction of a fee for the assessment of End of Waste applications to the EPA.
- End of Waste Criteria currently is site specific. We recommend that once end of waste criteria are established for a given material, process and or application, this standard is of universal application to any duly authorised permitted facility, which produces a product to this specification.
- We recommend that Publicly Available Specifications should be developed for particular End of Waste products and processes.
- We recommend that a mechanism is established to encourage pan-European cooperation regarding End of Waste specification and approval taking into account best practise. In the case of tyres, we see the chance for Ireland to be an EU leader by example.

15. Extended Producer Responsibility

Repak ELT would like to make the following comments:

- We support the proposed short-term measures regarding the expansion of the tyres and waste tyres scheme to include all categories of tyres i.e. truck tyres, agricultural and industrial tyres.
- We recommend that in relation to new or used imported vehicles, the visible environmental management charge is applied when the vehicle is assessed for vehicle registration tax (VRT) at an NCT centre. Currently, there is no mechanism for collecting the visible Environmental Management Charge (vEMC) on private imports of new or used vehicles. We also believe that the importation of part used tyres for sale should be captured and treated in the same way as the placing of new tyres on the market.

- The addition of an EPR scheme for waste oils (Motor, Lubricating, Mineral) would also complement the existing services supplied to the main motor industry by the tyre scheme.
- We recommend the addition of EPR schemes for other waste sectors, paint and paint containers and medical waste would also add value to the green economy. Compliance expertise is already in existence in the current EPR scheme network. Utilise the expertise that already exists, common systems, reporting, IS systems and collection networks.

16. Waste Enforcement

Q. What in your view, are the factors leading to waste crime?

- Waste arising as a result of black market activities e.g VAT fraud
- Lack of a centralised repository for data reporting
- Lack of a centralised dedicated enforcement multi-agency resource
- Length of time taken to bring a prosecution to court, combined with inadequate penalties/deterrents

Q. Should financial provision be a requirement for permitted waste facilities?

- Yes, possibly in the form of a bond. A similar scenario should be used for collection permits.

Other comments:

Repak ELT would like to add the following comments:

- We recommend rigorous auditing of waste facilities and fines for inaccurate reporting within the Annual Environmental Return.
- Application of more stringent criteria for issuing collection and or facility permits.
- Auditing of the annual environmental return of permit holders.
- Greater transparency regarding waste movement documentation we recommend a centralised on line waste tracking facility is established. e.g. Annex VII's, numbering system that only registered brokers can access.
- Share information with all relevant stakeholders including PRI schemes, to add accountability/transparency.
- Create a waste section within The Revenue Commissioners that has powers to track material going onto and off the market, including full transparency on end markets.

17. Waste Data & Waste Flows

Q. Do you believe it would be more beneficial to have all/most waste data available on at least a quarterly basis?

- We agree in principle that yes all data should be available on a quarterly basis. Standardised reporting may need to come into effect for this to happen as not all agencies operate on the same time frames.

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

Yes, we agree this should happen and technology should play a part, especially waste crossing the border. Manual documentation needs to be phased out as it is wide open to counterfeiting and fraud and electronic systems should be deployed. This could include automation of the NTFSO (National Trans Frontier Shipping Office) Documentation eg Annex VII

Other comments:

Repak ELT would like to make the following additional comments,

- Lack of reporting or incorrect reporting should be fined and if numerous discretions take place, the permit should be under review.
- All waste should be traceable from pick up to end market destination.
- Consolidated reporting and proper classification for material is essential for accurate reporting across all agencies.
- Agencies collecting data need to work more collaboratively.

20. Green Public Procurement

Q. What are the barriers to public authorities using GPP?

Repak ELT believe the following barriers may be an issue:

- Lack of understanding of recycled materials and their uses
- Costs may be higher - meeting budgets
- Contractors not willing to use recycled materials
- Projects do not specify the use of recycled materials
- End of Waste Criteria for waste products – systemic problem

Q. How can businesses support more widespread use of GPP?

Repak ELT believe the following supports could be put in place:

- Central repository of 'Green Materials' and their uses and suppliers.
- We recommend that all public contracts specify the use of green GPP e.g. Central & Local Government, State Agencies.

- We promote the use of Environmental and Social Considerations in Public Procurement. We recommend that Tyre Derived Asphalt forms part of the standard procurement specification on all roadways and pavement construction projects.
- We believe the use of tyre derived rubber material should form part of all green public procurement. We note that these materials have been successfully used within the EU in a number of projects in the road and rail infrastructures.