

Repak Response

to the Public Consultation Waste Action Plan for a Circular Economy

Repak Limited welcomes the opportunity to provide input to the Public Consultation Waste Action Plan for a Circular Economy, in order to achieve a balanced plan which has the right level of ambition, is evidence based, and will provide clarity for all stakeholders in these challenging times ahead.

As an environmental not-for-profit organisation, with a social mission, Repak's purpose, on behalf of its members, is: to lead the recycling and sustainability of Ireland's packaging waste, advocate for a new circular economy, and educate businesses and consumers on reducing and recycling packaging waste.

Repak is a Producers Responsibility Organisation set up by business in 1997 and currently has over 3,400 members. The members are producers of packaging and the threshold is any company who places more than 10 tonnes of packaging onto the Irish market with a total turnover greater than €1 million in the calendar year. Repak's fees are based on a pay-as-you-produce basis i.e. the more packaging placed on the market by a producer, the higher their fee. The fees paid to Repak by members are used to subsidise the collection and recovery of waste packaging through registered recovery operators, i.e. companies such as Panda, Thornton's, Greenstar etc. that collect waste packaging from households, civic amenity sites and bottle banks for sorting and separation for recycling across Ireland. This is how individual member companies comply with the Packaging Regulations and joining Repak is the most efficient and cost effective way for them to meet their compliance obligations, under the Packaging Regulations.

Repak members have funded over €450m for the recovery and recycling of packaging waste in Ireland since 1997. Repak is approved under licence by the Minister for Communications, Climate Action and Environment, to operate as a compliance scheme for packaging recovery. Since Repak was set up in 1997 packaging recycling in Ireland has grown from a very low base to the point where Ireland is now one of the leading recycling countries in the EU.

1. Institutional Arrangements

The establishment of an Advisory Group which will oversee the development of the Waste Action Plan is a very welcome initiative. Undoubtedly the Advisory Group, with representatives from across the spectrum will explore the full potential and bring forward new ideas and build consensus regarding the way forward. It is also sensible that the Advisory Group will continue its work in overseeing the implementation of the Waste Action Plan.

Consultation Questions

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

Response

In recent times the establishment of the WERLAs has led to improved coordination among the regulatory bodies in their remit of protecting the environment and enforcing current waste legislation. With the transposition of the CEP Directives and the raft of

secondary legislation to come, which will transform the environmental landscape, there is no room for complacency. The bar will be raised significantly for all stakeholders and the current institutional arrangements may have to be reviewed and strengthened to ensure Ireland is best placed to deliver on the new Waste Action Plan.

There are a number of environmental regulatory bodies with responsibility for enforcement of waste legislation and for licensing of waste infrastructure. A review of the institutional arrangements should examine the potential of streamlining and amalgamating the various agencies/bodies to ensure there is no duplication of effort. There also needs to be consistency of approach and a total market view on infrastructure needs and demands in the context of a Waste Action Plan. For example: there may be potential to explore synergies and combine the National Waste Collection Office and the National Trans-Frontier Shipment Office, licensing of facilities by one body for all waste facilities in the country rather than have 31 LA's having facilities under 50,000 tonnes and the EPA all others.

The setting of priorities and the buy in of all institutional bodies, at all levels will be critical to success in the future. National priorities should be in the public domain, in addition to actions and timelines setting out a roadmap towards the achievement of same. The priorities should be reviewed on an ongoing basis and an end of year annual report should be published.

All stakeholders including the public should have to play a role. There is greater awareness now and an appetite among the public to do the right thing regarding the environment. This could be harnessed to encourage the public to report actual or potential breaches of waste legislation and consideration should be given to the establishment of a mechanism to capture the reporting of same. We need to change the dynamic to ensure there is a "no tolerance" approach to breaches of waste legislation.

There needs to be consistent application of waste legislation and strong enforcement across all local authorities. Any legislative barriers to the enforcement of waste legislation should be removed.

Improved coordination, collaboration and greater data sharing among the institutional agencies would enhance and improve the waste management arrangements.

- 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?

Response

Ireland has a deficit in waste management infrastructure, with the result that we have an over reliance on overseas markets and export a significant amount of our waste abroad for final treatment. There is an opportunity now to re-examine our approach and to take steps to become more self-sufficient, in the management of our waste. Obviously, economies of scale come into play and there will be a requirement for

significant investment, both public and private, to underpin the development of waste management infrastructure in Ireland.

It is about providing the right policy framework, support and incentives. The benefits of managing our waste at home are obvious in terms of the proximity principle, sustainability, creation of employment and from a climate change perspective in reducing our carbon footprint.

Among the general public and businesses, awareness of the circular economy is currently at a low level. Given that circular economy principles are going to be a key driver of change in the future, a significant public awareness and communications campaign, using all communication channels (television, print, radio, social media etc.) should be rolled out to lay the foundation for change.

In the context of the circular economy, opportunities for businesses to promote and support greater repair, reuse, recyclability and recycled content in products should be supported and incentivised.

This can only come about with a national policy for Waste Action for a Circular Economy that has measurable deliverables and are overseen and reported to the Irish Public. A good communication strategy, consistency of messaging and the provision of easy accessible infrastructure for the public will be key.

2. Municipal (Household and Commercial) Waste

The short-term measures for 2020 and the other policy options and measures set out in the consultation document are all very positive and if delivered on will bring significant benefits.

Consultation Questions – Municipal Waste

- What further measures should be put in place by Government, regulatory authorities (EPA, local authorities, etc.) and industry stakeholders in order to promote and incentivise waste prevention and improve proper segregation and recycling of waste by both households and businesses?

Response

The following are a number of suggestions geared towards promoting prevention and improving the recycling of waste;

- In addition to the colour coding of bins, ensure that a common form of waste collection bin – (size/shape etc.) is employed across the state or migrate towards that end goal – so that the general public are not confused by sizes and shape and that exclusion practices (e.g. shape and size of apertures for example) are uniform.
- Ensure that bins or other collection assets at on-the-go events (festivals etc.) bins and other collection assets, are colour linked to those contained on the high street. It is important that consumers get a consistent and simple message on waste segregation with minimal room for doubt or varying interpretations. An

example would be green bin for recycling, brown bin for compost, black bin for residual waste.

- Increase the numbers of bring banks and civic amenity sites, to improve ease of access for the public.
- What measures or practices are currently in place that could be improved?

Response

A high profile information and awareness campaign should be run advising the consumer of how collection of recyclable waste products occurs. Once collected, where do the bin contents go? How much of the material from segregated bins is not suitable for recycling? What is the effect of the general public making a concerted effort to segregate better? What are the operational and environmental benefits? How does this link into best practices across EU Member States?

- What other new measures or practices could be put in place?

Response

Gather additional data and carry out annual waste segregation/characterisation reports for municipal waste collections, in a region by region basis and including urban and rural areas.

- What do you see as the barriers/enablers to these measures?

Response

The private waste sector will be reluctant to make the changes to bin colour consistency because of cost and logistics. This can be supported by a transition period and a step plan of actions to get to a set bin colour (to include time period, cover changes initially, stickers etc.). This is very important messaging for both householder and business that consistency is coming into the market. The action will need to be supported by regulation given the diversity of operators in the market.

There may be barriers to progress due to the local procurement and budgetary constraints within certain public authorities – city corporations and county councils for bring banks and civic amenity sites. This could be enhanced by once off grants for authorities to allow them develop both and supported by PRI's where relevant.

Another option worth considering is to make waste enforcement a separate ring-fenced and adequately resourced budget item at Local Authority level with specialist legal resources dedicated to enforcement.

Consultation Questions – Household Waste

- Is incentivised charging working in your opinion? Are households being financially incentivised to prevent waste and recycle correctly through the 3 bin system?

Response

Segregation of correct materials into the three bin system should be mandatory across the state. While operators will, for commercially sensitive reasons, have different

collection and charging regimes, the percentage difference in charges across the three bins should be similar if not fully prescribed. As a minimum, there should be a clear price differential between the charges for MDR & bio (brown) bins and the general waste (black) bins. This incentive should be explicit on contracts and invoices throughout the life of the service. Householders should be informed of the potential for savings made by improvements in segregation.

Obviously geographical differences (rural, urban etc.) come into play with regard to charges. Obviously services should be available and the charging systems in rural areas should not be a disincentive to householders.

Some households have responded positively to incentivised charging, however consideration should be given to the introduction of other measures to identify those who do not recycle correctly, either due to lack of awareness or willingness to do so.

Recovery operators should proactively communicate with and advise their customers and should use all means (i.e. technology, use of cameras etc.) to identify those who make no effort to recycle properly and if necessary, impose sanctions on them (i.e. no collection or higher charges etc.).

Operators should use standard literature and promotional/educational publications encouraging segregation, that conform to a minimal common policy including infographics, with nomenclature avoiding any local terminology that is not used across the state. This will ensure that as people relocate, or holiday away from home within the state, they will always deal with a common description of waste practices and policies.

- Would an incentive scheme which compared your performance on how you generate and recycle your household waste with your area / county etc. change your waste management behaviour?

Response

Any initiative that encourages improvements in recycling should be encouraged. An incentive scheme informing individuals of their own recycling performance, coupled with advice as to how to improve, could lead to behaviour change and increased recycling rates.

It is certainly worth piloting and any improvements achieved as a result should be marketed in promotional material in the form of QMS or other good business management practice. This should be part of the operators selling point that they “have assisted xxx customers in improving their waste segregation practices and recycling rates by xxxx% and xxxx tonnes and highlighting how this contributes to CEP and other local and national environmental targets.

- What role should Civic Amenity Sites (local recycling centres) play? Should there be a standard service across all Civic Amenity Sites (CAS), such as the waste streams they accept? Should CAS accept general waste or only recyclables? Should CAS be used to provide more reuse opportunities, e.g. areas dedicated to exchange and upcycling? If so, how should this be funded?

Response.

Civic amenity sites should be user friendly and conform – insofar as possible – to a standard layout and common waste acceptance criteria, especially in all new sites. Where these differ, this can cause confusion if householders are unsure as to whether their waste can be accepted at a civic amenity site at all. Householders need clarity and they should be in no doubt as to what their civic amenity site will accept.

There are inadequate civic amenity sites per head of population in Ireland. Ireland is not in line with best practice. The RPS (Municipal Waste Characterisation) should be considered in full.

Civic amenity sites should be open seven days per week and on bank holidays if possible. These are times when people traditionally have the capacity to plan and deliver segregated waste, house clear-outs, garden clean ups etc. Householders should be accommodated and encouraged to use civic amenity sites to the maximum.

Civic amenity sites should also provide reuse and upcycling facilities. These could be funded through a variety of sources such as; the environmental fund, sponsorship, modest charges from users etc.

- What can be done to improve recycling (including organic waste) in apartment complexes?

Response

Many apartment blocks have limited recycling facilities and some older blocks have no recycling facilities. If recycling infrastructure is not provided in an apartment block, it follows that there will be little or no recycling from that apartment block. This is a lost opportunity and given that we face much higher recycling targets in the future, we will lose a lot of valuable material, if only one waste bin is provided and no recycling bins.

Providing adequate recycling facilities should be part of the planning process for all new apartment builds and over time older apartment blocks should be retrofitted with the provision of recycling facilities. These provisions should be legislated for and apartment blocks should be inspected to ensure they comply in this regard.

In addition to the installation of recycling facilities, a pro-active awareness campaign should be targeted at the residents of apartments to make them aware of their obligations and to encourage behaviour change.

Consultation Questions – Commercial Waste

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

Response

There is general agreement in the waste industry that incentivised pricing, based on weight, should be introduced for commercial waste. This, in some respects, is considered “low hanging fruit” and it would certainly contribute to better segregation of

backdoor waste and improved the quality of the material and increase the recycling of same.

Private waste operators already have the technology and weighing systems in place to facilitate the introduction of an incentivised pricing and measurement scheme for business.

- What further incentives could be put in place to encourage business to recycle more?

Response

Mechanisms to ensure fair pricing, with a price monitoring role by the Price Monitoring Group (PMG) should be considered. This would provide a level playing field and may serve as an incentive for business to recycle more.

Most businesses will want to be seen to do the right thing for the environment and if there is greater oversight, with some form of waste auditing or inspection regime, it may drive change in this area.

- Should a certification scheme be introduced for businesses to demonstrate that businesses are managing their municipal waste correctly (e.g. using the mixed dry recycling and organic waste bins properly)?

Response

Yes, a certification or scoring system (KPI or Recycling Index for business) should be developed to recognise best practice and good behaviour and to highlight poor waste management practices. It would drive improvement in segregation and raise the priority of waste management for businesses. Good behaviour could be rewarded and recognised and there may be cost savings for businesses who separately segregate and present clean material for recycling. On the other hand, businesses who do not segregate properly should be charged a higher price by their recovery operator, to reflect the additional costs associated with the management of their waste.

A mature certification system would over time also generate a certain amount of peer pressure, as businesses would strive to ensure they do not give their competitors an advantage by not achieving certification in the management of their waste.

3. Plastic and Packaging Waste, Single Use Plastic

The challenge of how best to manage plastic packaging waste to minimise its impact on the environment, is an issue which has come centre stage right across the globe. Managing plastic packaging is a key priority of the EU Circular Economy. This is evidenced by the publication of the EU Plastics Strategy, setting out a vision of the plastics economy for 2030 and the enactment of the Single Use Plastics Directive.

The strategy sets out a strong business case for transforming the way products are designed, produced, used, and recycled in the EU, while at the same time creating new investment opportunities and jobs.

The goal is to protect the environment from plastic pollution whilst fostering growth and innovation. Under the new plans, all plastic packaging on the EU market must be recyclable by 2030, the consumption of single-use plastics will be reduced and the use of micro plastics will be restricted.

For many years Repak has been pro-actively working on solutions to the challenges in managing plastic packaging, with a focus on: increasing the recycling of plastics, improving the design, advising on prevention, reducing packaging and minimising waste.

It is important at the outset to take a balanced view on plastic packaging. Plastics are a very efficient material for the packaging and transportation of products, in that plastic packaging is light and compact and without plastic packaging, approximately 50% more transport, with an increased carbon footprint, would be required.

However, the image of the plastics packaging industry has been damaged by the effects of littering both on land and in the sea. The assertion that, if we continue to discard plastic the way we have been doing that, accordingly to a report from the Ellen MacArthur Foundation, by 2050 there will be more plastic in the oceans than fish, has come as a shock and a wakeup call for many.

Repak has a number of ongoing major initiatives and projects on plastic packaging such as

- Repak Plastic Packaging Recycling Strategy

https://repak.ie/wp-content/uploads/2018/09/Repak_update_v2-with-cover.pdf

- Repak Plastic Pledge

<https://repak.ie/wp-content/uploads/2019/06/Repak-Plastics-Pledge-Report-2018-Interactive.pdf>

These documents are already in the public domain and should be considered in this consultation process as they address most of the issues and propose answers to many of the consultation questions posed on plastic in the public consultation document.

The following is a high level overview of the Repak Plastic Strategy and the Repak Plastic Pledge;

Repak Plastic Packaging Recycling Strategy

It was against this backdrop that Repak launched its Plastic Packaging Recycling Strategy in September 2018, which sets out to inform policy makers and recommend actions for stakeholders and for Repak members in particular. It provides a holistic solution to the plastic waste recycling challenge presented by the CEP.

The Repak Plastic Packaging Recycling Strategy sets out measures that will:

- Assist Ireland in meeting its recycling targets;

- Promote the design and production of plastics and plastic products that optimises use and recycling;
- Support the circular economy;
- Achieve the above in a cost-effective manner.

Repak has a key role to play in the strategy. It is uniquely placed between producers and the recycling sector with a remit set by Government to influence and implement measures aligned with the four fundamental priorities of this strategy:

- Improving data flows and evidence.
- Promoting better eco design of plastic packaging.
- Increasing reuse and recycling of plastics.
- Educating consumers on sustainable consumption.

There are significant challenges in relation to quantifying the amounts of plastic packaging waste generated in Ireland. There are data gaps between the EPA Plastic Packaging Waste data and Repak's member data which need to be addressed. Repak is pleased to see that the data issue has been taken up by DCCA, the EPA and Eurostat and that it is being examined to ensure there are no anomalies and to understand why the amount of plastic waste generated per person, per annum in Ireland is 60kg, which is double the EU average of 31kg.

This figure of 60kg per head is damaging to Ireland's reputation and paints Ireland as laggards in the EU. It also has serious financial implications for the country under the Own Resources tax initiative, which would leave Ireland facing a tax bill in excess of €140m based on 2016 data (for plastic packaging which is not recycled).

The Repak Plastic Strategy is designed to initiate the development of solutions and inform policy. Reaching most of the objectives and actions that are described throughout the document will require innovation and research, improved infrastructure and therefore significant additional investments. It is essential that these costs are distributed equitably across the stakeholder chain.

In delivering the strategic vision, a two phase approach is proposed. Phase 1 (covering the period 2018-2020) provides the timeframe to close data gaps and put in place an effective framework and recommended actions for all stakeholders. During this period, a fully costed detailed plan to underpin the strategy will be produced. Phase 1 will provide a sound foundation on which the strategy for Phase 2 (covering the period 2021-2030) will be implemented.

Achieving our EU targets for plastic recycling will require a major attitudinal change within society, something akin to what was achieved with the plastic bag levy or smoking ban. There is a role for every sector of society to play in addressing the plastics challenge and this document is designed to give everyone a pathway to achieving this.

A total of 65 different organisations and 81 individuals were invited to consult on the proposed Strategy and the stakeholder views are reflected in the document. The Strategy consists of 35 recommended actions, to deliver the objectives of the CEP strategy for plastics. The following is an extract listing the recommended priority actions:

Objective	Owner	Action	Priority
Improving Data Flows	EPA/ Repak	Identify the reasons for the difference in plastic packaging waste and plastic packaging placed on market and agree a methodology to quantify plastic packaging waste by type.	Urgent
Designing Better Plastic Packaging	Producers	Commit to a Plastic Pledge to reduce plastic packaging waste and help Ireland to play its part in achieving the key goals set out within the EU Circular Economy Package. (See Appendix 3)	Urgent
Designing Better Plastic Packaging	EPA	Plastic packaging waste to be made one of the priorities for the National Waste Prevention Programme.	Urgent
Designing Better Plastic Packaging	EPA	Setting up of an eco-design working group under the National Waste Prevention Programme to provide leadership, advice and direction on key issues.	Urgent
Designing Better Plastic Packaging	DCCAE/ EPA	Develop and disseminate guidance on the end-of-life of biodegradable plastic packaging products. ⁴	Urgent
Increasing Reuse and Recycling of Plastic Packaging	WMROs/ Repak	Identify where to capture additional plastic packaging waste for recycling (household, commercial, multi-occupancy, on-the-go, etc.).	Urgent
Increasing Reuse and Recycling of Plastic Packaging	DCCAE/ Waste and Resource Sector	Undertake a study to identify what collection system or combination of collection systems (including deposit refund) will work best to achieve reuse and recycling targets and reduce litter. ⁵	Urgent
Increasing Reuse and Recycling of Plastic Packaging	Repak	Review and pilot subsidy rate for more challenging recyclable plastic type (e.g. films and composites).	Urgent
Encouraging Consumer's Sustainable Consumption and Behaviour	DCCAE	To setup a communication advisory panel to inform communication priorities, co-ordinate local, regional and national messages. Members to include EPA, Local authorities, Repak, Waste and resource sector, retailers, Consumer's group and NGOs.	Urgent
How to achieve the Vision	DCCAE	To set up a plastic packaging working group and develop terms of reference.	Urgent

Plastic Pledge

The Plastic Pledge is an initiative of the Repak's Plastic Packaging Recycling Strategy. It is one of the key recommended actions of the Strategy for Repak members and other stakeholders to commit to a Plastic Pledge, which will make a significant contribution towards meeting Ireland's packaging recycling targets as set out in the CEP.

The Plastic Pledge was launched in September 2018; to date 114 of Ireland's largest producers of packaging have signed the pledge and this number continues to rise.

The Plastic Pledge has five key objectives as follows:

- Prioritise the prevention of plastic packaging waste by minimising avoidable single use packaging and promoting packaging reuse where possible. This aims to help reduce the quantities of avoidable SUP placed on the Irish market. This proactive step is being encouraged in advance of the transposition of the SUP Directive, which is scheduled for July 2021.
- Support Ireland to deliver the Circular Economy Package plastic recycling targets of 50% of all plastics by 2025 and 55% of all plastic packaging by 2030, as set by the European Commission. This relates directly to the new packaging recycling targets set out in the Packaging and Packaging Waste Directive approved by the European Commission in July 2018. This objective is designed to help improve both commercial and household plastic packaging recycling rates through better packaging design.
- Reduce complexity within the plastic packaging supply chain by simplifying polymer usage and eliminating non-recyclable components in all plastic packaging by 2030. Plastics are often complex materials making them more challenging to recycle than other packaging materials. Reducing the complexity of our plastic supply chains whilst maintaining quality and safety is the key to achieving higher plastics recycling rates.
- Help to build a circular economy for used plastic packaging in Ireland and Europe by increasing the use of plastic packaging with a recycled content. Another key aspect of the EU's Plastic Strategy is about stimulating the market for recycled plastic materials in Europe, by incorporating recycled content into packaging.
- Ensure our approach to plastic packaging reduction is aligned to Ireland's goal of a 50% reduction in food waste by 2030, as set out in Ireland's food waste charter. One of the most likely consequences of knee jerk reactions to the plastic challenge is an increase in food waste and it is critical that this is avoided. With over 1 million tonnes of food wasted annually in Ireland, this is about ensuring that ongoing commitments to reduce food waste continue to proceed in the right direction.

The first Plastic Pledge Report was published in May 2019 and it highlights the proactive approach that the signatories of the Plastic Pledge are taking to remove single use plastics from their businesses. Many of Repak's retail members are also proactively delisting items from sale ahead of the transposition of the Single Use Plastics (SUP) Directive.

In addition, businesses are examining where plastic use can be minimised during the course of their day-to-day operations. This will minimise waste arising during the production of their products.

They are also actively reducing avoidable plastics associated with their consumer products.

An average of an 11% reduction in plastic packaging has been reported by Repak's Pledge Members as having been completed during 2018 and while the 2019 data is not yet available, there were many more significant reductions in 2019.

Producers recognise the value of plastics to the economy in terms of ensuring that products get to their customers safely and offer the quality they expect and deserve.

The complexity of plastic packaging, versus other materials, compromises our ability to capture many of them for recycling and producers are working on solutions to this challenge.

Fee modulation, which Repak is currently piloting with the aim of introducing modulation for plastic packaging in January 2021, will promote behaviour change and incentivise eco design and reduce the amount of difficult to recycle plastics. It is about getting the balance right, to increase and enhance the recyclability of plastic packaging, while ensuring that product stability or shelf life is not reduced.

Many producer members have also committed to achieving their own corporate goals that are very much aligned to Repak's Plastic Pledge.

In excess of 120 programmes designed to make plastic packaging more recyclable, have been completed or are currently in progress by Pledge Members. Appendix 1 to the Pledge Report sets out examples of members actions, case studies and plans in this regard. Some of the case studies are very innovative and impressive and serve as examples of best practice.

The next Plastic Pledge Report is scheduled to be published in May 2020, which will outline further progress completed throughout 2019.

Plastic Pledge Working Group

Another initiative of relevance here is the work of the Plastic Pledge Working Group. In order to help shape a consistent way forward that tackles the main barriers to achieving the five plastic pledge objectives, Repak members, waste industry stakeholders and policy makers were all invited to participate in a Plastic Pledge Working Group.

On the 26th of November 2019, Repak hosted the first working group forum where participants were asked to brainstorm the main challenges and potential solutions in relation to the following topics:

- 1. The recycling of flexible plastic packaging collected from Irish households.**
- 2. Improving recycling rates for all plastic packaging collected from commercial businesses.**

As a direct result of this forum, a large number of possible actions were identified. Listed below are ten of these actions (five in relation to each topic) viewed by the group as significant priorities in relation to the pledge objectives.

Commercial	Household
Roll out of incentivised pricing on waste collection for all businesses with a target to achieve by Q4 2021. To form part of waste policy consultation.	Design guidance in relation to fee modulation incorporating design for recycling advice to members with a target to achieve by Q2 2020.
Develop a waste management training programme for businesses with a target to achieve by Q4 2020.	Aim to reintroduce flexible plastic packaging into household recycling bins with a target to achieve by January 2021.
Make list of commercial packaging suitable for recycling available on mywaste.ie platform with a target to achieve by Q4 2020.	Aim for the standardisation of bin colours on advice from DCCAE to provide national consistency and reduce consumer confusion. Timings to be reviewed at next meeting.
Develop a sub group to work on improving timings and data sharing in relation to waste statistics – timings to be reviewed by group.	Aim to provide a green bank to allow for investment in the waste industry. To form part of waste policy consultation.
Develop a metrics based business performance index to help increase recycling and reduce contamination. Timings to be reviewed at next meeting.	Examination of opportunities to standardise on-pack labelling in Ireland to be discussed at the next meeting.

As a result of this initial forum, a smaller steering group was then formed to examine the top ten projects and determine their feasibility and possible timelines for implementation. It is envisaged that this group will meet throughout 2020 and beyond to track progress against proposed timelines. The next meeting has been scheduled for the 23rd of March 2020 at the Repak offices.

4. Circular Economy

Repak has been monitoring developments for the past number of years at EU level as the Circular Economy Package (CEP) progressed through the legislative process. It is an initiative that has the potential to drive transformational change in our economy bringing significant major economic benefits and contributing to innovation, growth and new employment opportunities. While sustainable waste management is a key element of the CEP, it also prioritises prevention, reuse and recycling.

It is important to note that the CEP is not just a waste initiative. It focuses on many aspects and sectors of the economy and the main goal is to move towards a more sustainable economy, which maximises the use of resources. In this regard, a key priority for the

Government has to be to provide the right policy framework and support. Repak is pleased to note that there will be Government engagement through a new Circular Economy Working Group, leading to the development of an All Sector Circular Economy Strategy.

Transitioning to a circular economy will be a major challenge and in some respects we are starting from a somewhat low base, in that the levels of awareness across Irish society and businesses of the CEP and CEP principles, are very low. The IBEC survey, dated August 2019, on the CEP indicates this and little has changed since then. The CEP is also not on the political agenda and with the exception of one party, the CEP is not mentioned in any of the recent party election manifestos.

The CEP is however, a key priority of the new EU Commission and a new Circular Economy Action Plan is due to be issued in March 2020. There is also now a direct link between the CE and climate change with the recent announcement of the new EU Growth Strategy, the European Green Deal, which is designed to cut emissions while creating new jobs. The European Green Deal is about becoming climate neutral by 2050. It is a very ambitious package of measures which will drive a sustainable green transition, delivering benefits to businesses and the individual citizen and preserving the natural environment.

While naturally there is an element of apprehension, Repak and its members are, for the most part supportive of the CE principles and will participate in the transition to a more circular economy.

Consultation Questions – Circular Economy

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

Response

All aspects of the Circular Economy should be looked at across the full value chain, from design to manufacture, prioritising durability, repair ability, reuse and recycling.

Innovative ways should be examined to encourage businesses to be more resource efficient, thereby minimising their environmental impact (i.e. more innovative, resource efficient production techniques, maximum use of technology etc.). This should lead to reduced costs and improved competitiveness.

In terms of potential for transformation, some other areas which should be focused on as follows;

- Promotion of reuse, recycling and recycled content in new products.
 - Promotion of new markets for recycled material.
 - Improvements and investment in waste management infrastructure.
- What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors?

Response

The basic lack of awareness of the Circular Economy (i.e. what it is? how will it impact on business, the consumer, the environment, what role should one play? what are the benefits, the costs etc.), is probably the greatest challenge to be overcome in increasing levels of understanding across the board.

A major national awareness/communications campaign is essential to increase levels of understanding and to promote the Circular Economy. There are significant business opportunities, access to funding for CE projects and potential for future job creation. These elements should be emphasised in any communications campaign.

5. Citizen Engagement – Awareness & Education

Repak supports the overall short term measures proposed. It would be important to continue to add more items to the MyWaste.ie A to Z list so that consumers can find the answer to more particular questions on recycling. Repak also supports the proposed policy options and measures.

Regarding education and awareness it is crucial for the future development of a Circular Economy to focus on Primary and Secondary Schools. Modules must be developed to teach our young people about protecting our environment, reducing carbon emissions, the Circular Economy, waste hierarchy, waste prevention and recycling to ensure the next generation are better informed and actively support the radical changes needed to shape the future of manufacturing, packaging, purchasing and consumption, required to protect our environment.

Consultation Questions – Awareness & Education

- What campaigns would better assist householders and business in preventing and segregating waste properly?

Response

There is currently a lack of understanding at consumer and business level of the ‘big picture’ – why preventing and segregating waste properly is so important – despite the current focus on our environment and climate change. This needs to be improved by more, simple communications that explain the connection between the ‘Circular Economy’ (which is still an unfamiliar concept to most people) and how we all manage our waste. Everyone needs to appreciate the value of the materials that go into their bin (commercial or household) as a raw material which can prevent natural resources being used in the future. This message is not currently getting across and needs to be communicated.

Householders and Businesses should get simple information and training from their waste operator on what goes in what bin. As mentioned previously, the on-going confusion is exacerbated by the fact that bins are different colours in different regions, so this also needs to be solved to help improve awareness and education. Equally, there needs to be absolute consistency between operators on what they

accept in each bin, so that their customers can move location or move provider, without having to be re-educated.

These campaigns should be rolled out by waste operators and complimented by ongoing educational activity at national level by MyWaste.ie and Repak.

- Should this be funded by Government or should the sector play a role in funding campaigns?

Response

Government should fund overall education on the Circular Economy and the importance of preventing and managing waste.

Waste Operators should fund the production and distribution of targeted communication to their customers across consumer and business audiences, with the messaging and design of all materials developed in conjunction with MyWaste.ie and Repak.

MyWaste.ie and Repak already run extensive consumer focused campaigns throughout the year to inform the public and improve recycling. While MyWaste campaigns focus on all types of waste, Repak focuses on the correct recycling of packaging waste, under its remit as an environmental not for profit organisation, which helps Irish business recycle the packaging they place on the market.

To help Ireland achieve ambitious EU recycling targets for plastics in particular, Repak launched its Team Green initiative in 2018. Team Green was developed to increase plastics recycling in Ireland, while improving recycling behaviour and increasing awareness of good waste management practice across business and consumer audiences. Team Green is a team initiative that encourages individuals, schools, communities, businesses and organisations to come together to recycle more plastic, reduce waste and protect our environment. Repak has invested significantly in this ongoing campaign and is expanding the campaign in 2020.

- Do you agree that collectors are giving sufficient information to their customers in relation to separating waste into the 3 bins?

Response

In some cases, information from waste collectors to their customers is insufficient. Information from collectors to their customers is also not consistent across Ireland and is particular to the operator. There needs to be a standardisation of the communication waste operators are expected to give their customers when they join, and on an annual basis, to clarify this issue, with options for online and printed information to facilitate any customers who do not have access to the internet.

- Do you think information stickers for bins, showing what's accepted in each bin should be rolled out to all householders?

Response

Yes, standardised information stickers should be rolled out to all householders. However, information stickers are one option – a trial needs to be done to ascertain if consumers will affix stickers to bins given they deteriorate over time, and will get worn away when bins are being cleaned. Another option for householders is a durable fridge magnet communication, which can be kept in the kitchen for reference.

- 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?

Response

Some other measures to improve our waste management practices are:

- A transition year (TY) education programme on the Circular Economy and Waste Management;
- Waste Operators to undertake in-person communication to householders;
- Soft plastics to be able to go back in the recycling bin, so that Ireland can achieve its plastic recycling targets.

6. Waste Management Infrastructure

Repak is very pleased to see that a long term target of the consultation process is to develop “more indigenous waste facilities to recycle waste in the State and capture resource potential here.” This would be very much in line with the Circular Economy and the proximity principle.

In the management of packaging waste, there is undoubtedly an infrastructural deficit and an over reliance on the export of our waste to overseas markets in Europe and further afield. There are several reasons for this; from limited investment to economies of scale, cheaper markets abroad and with the benefit of hindsight, lack of forward planning at national level.

There is an obvious lack of infrastructure for the collection of “on the go” packaging material. Such infrastructure in urban areas, high streets etc., would reduce littering, promote positive consumer behaviour and increase recycling. Repak is aware that in recent times, some Local Authorities have removed on street bins for the collection of “on the go” material, perhaps due to the costs of servicing the bins and the belief that consumers should bring their material home for disposal in their household bins. This of course does not cater for tourists.

There is also the view that we can learn from other jurisdictions in this regard, by providing underground refuse collections systems in public spaces. Such systems once installed lower collections costs, reduce littering and the unsightly bags of waste refuse in public areas on collection days.

In the past, the management of our waste was not seen as a priority at national level, rather it was seen as a local authority and regional function. It is only in recent years that we have woken up to the fact that for a first world country, we should manage our waste in a more sustainable manner and reduce our reliance on the export of our waste to markets abroad, often to less well developed countries.

The recent closure of the Chinese markets to plastics caused a shock to the system not only in Ireland but across Europe. This led to the stockpiling of plastic waste, increased incineration and in some cases the risk of more plastics going to landfill and the leakage of plastic waste into the environment. If there was one lesson to be learned from this crisis is that, we need as a country to become more self-sufficient and maximise control of the management of our waste.

Consultation Questions – Waste Management Infrastructure

- Should one national waste management plan be produced in place of the 3 current plans?

Response

Yes, given the demographic of Ireland, a single waste management plan would seem to make sense. It would reposition and prioritise waste management and potentially eliminate inefficiencies which may exist from Region to Region.

On the surface the benefits of a national plan as opposed to regional plans has the potential to deliver more consistent, coherent planning and more balanced regional development. It would also take into account economies of scale, as the development of waste management infrastructure regionally, may not make sense from an economic perspective, but at national level there may be a strong business case to develop the same infrastructure. An example of this is a joint project between Repak and the IWMA which is still at the scoping stage, to look at completing a feasibility study and business case to build a plant for managing mixed recovered paper in Ireland. Ireland currently produces circa 100 tonnes of Mixed Paper RCP, which until recently was sold on the export market. With new restrictions on the sale of such material on key export markets, a new outlet for such material is being sought. A potentially viable solution is to set up a plant in Ireland, to clean and dry the fibre, together with a proportion of OCC RCP, which can then be sold as “brown recycled market pulp” to markets such as China where high demand exists for these grades. The purpose of the feasibility study is to test this hypothesis and confirm the project logic, and to determine if this is a viable project.

There is an opportunity now which may not have been there in the past, with the increased levels of awareness among the public of environmental issues, to make progress on this front. The planning of waste infrastructure, is an area which has been somewhat neglected and planned in a piecemeal fashion.

If the benefits of developing a national plan to modernise Ireland’s waste management systems, with the necessary infrastructure to manage our waste, were communicated to

the public, it would harness public support as currently there is an appetite for projects which protect and safeguard the environment and which are aligned to the goals of the Climate Action Plan.

A working/steering group, composed of a group of relevant stakeholders, should be established to oversee the development of a national infrastructure plan. This would obviously have to be a subset of the national waste action plan.

A first step would be to assess the capacity (to manage waste) currently available and forecast what capacity will be needed in the next ten years in order to meet Ireland's commitments, on foot of the CEP and the new EU legislation. The bar has been raised significantly, particularly with regard to the new recycling targets for plastic under the PPWD and the SUP Directives.

- Should the regional offices be set up on a statutory basis?

Response

The priority should be the development of a national plan. If setting up the regional offices on a statutory basis would strengthen the framework for the delivery and implementation of a national plan, then they should be established on a statutory footing. Decision makers here should be guided by what will deliver the best possible outcome.

- Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded?

Response

The State should assist in the development of indigenous waste recycling facilities (Civic Amenity Sites, Bring Banks and a common IT Communication Platform & messaging) It will not happen if it is left to the private sector alone.

Assistance and funding could be provided through a combination of measures; grants, tax incentives, public private partnerships, EU funding (from CEP budget) etc.

7. End of Waste

End of waste criteria and the process of turning your waste into a new non-waste product or material, will be a key enabler in the Circular Economy and in keeping resources in use for as long as possible.

Consultation Questions – End of Waste

- 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?

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?

Response:

Yes, the Government should seek to establish a group to apply for national End of Waste decisions for appropriate products. Investment in infrastructure to produce products from waste will be contingent on End of Waste criteria and guidance being available and decision being made on a timely basis. To encourage investment this is critical.

It should be a group with technical expertise and should represent a broad range of key stakeholders such as manufacturers, converters, consumers and recyclers. Technical support should be provided by an independent body (for example the Materials Science Faculty of a university or equivalent). The technical Group would make recommendations to the EPA for decisions to be made on a timely basis for determination of End of Waste.

As well as Aggregates and Incinerator Bottom Ash, end-of-waste can also include packaging material and can currently cause barriers to the efficient collection, movement, and processing of packaging (particularly plastic polymers) for recycling.

A standard application form for end of waste applications and a more streamlined application process would be of benefit and end of waste protocols could be developed and applied by the EPA, which may speed up the process.

Two recent examples of EPA decisions on end of waste criteria highlight a weakness in the system;

- On 12 June 2018 the EPA decided that recycled LDPE material produced by Irish Packaging Recycling will cease to be waste if it complies with end-of-waste criteria as set out in the EPA's decision document.
- On 15 October 2019 the EPA decided that polyethylene terephthalate recycle produced by Shabra Recycling Limited will cease to be waste if it complies with end-of-waste criteria as set out in the EPA's decision document.

These are both company specific/stand-alone decisions and still restrict the movement of the material by any other operator rather than the two prescribed. It also only refers to two (PET and LDPE) of the six commonly used Packaging polymers (PET, HDPE, PVC, LDPE, PP and PS).

If we are to come up with solutions to encourage greater recycling of plastic packaging, we must find a way of moving all of these polymers as end-of-waste without each individual company having to apply for a polymer specific licence. Once an application is granted based on a successful application to the EPA, a national End-of-Waste Group could examine the potential to grant end -of -waste to

other applicants without them having to go through a detailed application process again.

There may be scope to adopt best practice from other EU Member States and to consider if there is potential to apply learning from the UK, regarding the use of quality protocols for specific wastes and end uses.

8. Extended Producer Responsibility

Repak was the first EPR scheme established in Ireland in 1997, to manage packaging waste and fulfil our obligations under the EU Packaging & Packaging Waste Directive. Since then, Repak has an impressive track record of success in achieving all EU and national recovery and recycling targets.

Repak is a strong supporter of extended producer responsibility (EPR) and recognises that EPR has a key role to play in achieving the goals of the Circular Economy, not only from a financial viewpoint but also in driving improvement in our waste management practices with regard to the management of packaging waste.

Repak accepts that producers' financial responsibility is increasing by the extension of producers' responsibilities to the post-consumer stage of a products life cycle, but the impact of this has yet to be fully determined.

Repak expects that full clarity will be provided for EPR schemes on the general minimum requirements set out in the revised WFD, when the EU Guidelines on EPR are published later this year. The Guidelines should clearly define; the roles and responsibilities of all stakeholders, costs, targets, governance, the concept of equal treatment etc.

For its part, Repak is fully committed to working constructively with all stakeholders, particularly its members and policy makers to deliver the best possible outcome in applying EPR and in meeting the challenges it poses into the future.

Consultation Questions EPR

- How do we ensure Ireland's existing producer responsibility initiatives are in a position to adapt in response to the EU legislative changes for EPR models?

Response

Repak has responded to the other consultation on the transposition of the Circular Economy Waste Package and there is clear cross over and linkage between the two consultations. In the Repak submission on the CEP the topics of: new obligations, future recycling targets and the funding of same, DRS, EPR/general minimum requirements, necessary cost, product design, eco fee modulation, SUP Directive etc., are all dealt with in some detail. In order to avoid repetition of the same points, on the topic of EPR, Repak's submission on the transposition of the Circular Economy Waste Package should be read in conjunction with this submission.

However, one issue put forward by Repak is worth repeating here and that is the need for a fundamental review of the current EPR model for packaging, to ensure that all producers placing packing onto the Irish Market share the financial burden. The

environmental landscape is changing significantly and while the Repak model has served Ireland well over the past twenty years, the structure and design of the model in its current form is not capable of delivering on the CEP objectives.

The following is the breakdown of the market in 2017:

Breakdown of the Market 2017		
	Tonnes	% of Market
Packaging Waste Generated (EPA Data)	1,038,408	100
Packaging Placed on the Market by Repak Members	603,375	58
De minimis, Self-Complier, Non Complier, Landfill etc.	435,033	42

The above table indicates that in 2017, Repak Members were responsible for placing 603,375 tonnes of packaging on the market, yet they funded 100% of the market. A significant proportion of the 42% of the market who are not Repak members, do not financially contribute to the recovery and recycling of packaging they place on the market.

The current model places a disproportionate financial burden on Repak members and is not sustainable into the future. Without fundamental change and the broadening of the funding base, it will undermine the scheme and Ireland's ability to achieve future recycling targets. Repak has submitted a range of recommendations (in the CEP consultation) for change, in order to enhance the current EPR model and to ensure that Repak can continue to play a key role into the future, building on its success to date.

9. Waste Enforcement

Since the inception of the Packaging Regulations in 1997 the majority of producers placing packaging onto the Irish market have sought compliance, through joining Repak or via the self-compliance route. Most producers embraced their compliance responsibilities at an early stage, but there has however consistently been an element of non-compliance among producers, who ignore their compliance obligations and choose not to pay a contribution towards the recycling and recovery of the packaging they place onto the Irish market. In these instances, enforcement is an essential and critical component in applying the Packaging Regulations, providing fairness and equity to all producers.

Over the past twenty years enforcement of the Packaging Regulations was not always as effective as it perhaps should have been. It appeared in some instances, to be a low priority for the enforcement authorities (i.e. the EPA and the Local Authorities), with lack of resources to oversee and enforce the Regulations a common feature. There was also a high level of tolerance for non-compliers and a reluctance to prosecute offenders. Enforcement authorities appeared to struggle with the process of gathering admissible and reliable evidence and would only take a prosecution if there was a realistic prospect of conviction. The cost of taking court action was also seen as a deterrent and as were the lenient sentences/punishments handed down by the courts in successful convictions. The

development of the Waste Enforcement Regional Local Authorities (WERLAs) has changed the enforcement landscape in a short time period.

It has to be recognised however, that while significant challenges still remain, there has been a marked improvement in the enforcement of the Packaging Regulations in recent years. Since 2016, the Local Authorities who are responsible for overseeing self-compliance and for the enforcement of the Packaging Regulations have, with the support of Repak, been participating in an annual enforcement programme. Guided by the Waste Enforcement Regional Local Authorities (WERLAs), a set number of Suspect Major Producers (SMPs) are identified and subsequently investigated by every Local Authority in Ireland on an annual basis. This programme has developed over time and has been successful in raising awareness and increasing significant compliance. It remains a work in progress and should be supported

Not only has the programme been effective in increasing compliance of major producers, but it also sends a message that non-compliance will no longer be tolerated. However, there still remains a significant number of major producers that are not compliant with the Packaging Regulations, known as ‘free-riders’. Repak will continue to support the WERLA’s as necessary to level the playing field for all its members.

Consultation Questions – Waste Enforcement

- 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?

Response

Our waste management practices would be improved if there was rigorous oversight of the process of issuing collection and licencing permits. There is also the perception that we tend to take a somewhat relaxed approach to the granting of same.

We also need to remain vigilant regarding the export of packaging waste abroad to ensure that it is going to approved end markets and not to third world countries who do not have the capability to process it in an environmentally friendly manner.

Repak recommend the following to build-upon the good work of the co-operation programme to date and to improve compliance with the Packaging Regulations, thereby reducing the amount of free-riders:

- Empowerment and additional funding support for WERLAs to pursue the prosecution of businesses that do not co-operate with enforcement measures.
- Additional funding and resourcing for Local Authorities to recruit and train more waste enforcement officers.
- Currently there are three WERLA regions (Southern, Eastern-Midlands and Connaught-Ulster) but over 50% of all Major Producers and SMPs are located in Leinster creating an uneven spread and additional enforcement pressure to this region. To create a better balance of resources, the Eastern-Midlands Waste Region could be divided into two (e.g. North and South or Dublin and surrounding Local Authorities) creating four WERLA Regions.

- The number of SMPs added to the co-operation programme has steadily increased year on year. However, there is substantial scope to raise this to 300 plus SMPs per year for the next 10 years.
- To strengthen enforcement further, it should be standard for all PRI schemes to financially support the development of the WERLAs.
- Other enforcement measures in addition to prosecutions should be considered, such as; the use of increased fines and fixed penalties and the publication (i.e. name and shame) of convicted offenders.

10. Waste Data & Waste Flows

Accurate, reliable and timely data is essential for sound decision making for any successful business and the waste business is no different. With regard to packaging compliance, it is crucial to be in a position to make informed choices and decisions using the best, evidence based data, in response to the challenges of the CEP.

Consultation Questions - Waste Data & Waste Flows

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

Response

Yes, it would be of significant benefit to have up-to-date quarterly data. The lag of 18 months in the publication of waste data and statistics by the EPA is obviously aligned to the EU reporting requirements. The waste industry is a dynamic market and much can change in an 18-month period, to make the data redundant and almost irrelevant 18 months later. More timely data would identify trends and changes in the market, which would help in responding appropriately to those changes.

Repak currently collects data from its recovery operators on a monthly basis and on a bi-annual basis from its members. Repak is aware that other PRI schemes collect member data on a monthly basis and is also considering collecting member data on a more frequent basis (i.e. quarterly or monthly).

- Obviously the collection of member data should be done in such a way that it does not become an overly complex, administrative burden. What resources are needed to validate this data more quickly and what are the barriers?

Response

Additional resources and investment in modern data capture systems, maximising the use of technology, would undoubtedly be necessary. It may however be an investment well worth taking in delivering timely, evidence based data.

Gathering waste data from various stakeholders needs to be underpinned by legislation and enforced

Data sharing should also be considered as part of this exercise. Ideally to validate data, you need cross checks between source and final destination. This means some tracking system to follow the waste through its life cycle. Currently, Repak sees the packaging being reported as being placed on the market by members and as being collected by recovery operators. This is only one view of the market and may not always give full line of sight of the material. It would be of benefit if the waste data collected from the recovery operators was available in the public domain for cross checking against the Repak data.

Reporting of all data through a central body for example the NWCPO office could have an immediate impact in eliminating duplication of reporting and give greater visibility of all waste data on a timely basis.

- How would you balance the need for validated reporting data for EU reporting against the desire for more up to date statistics?

Response

There should be no conflict here between the EU reporting requirements and the collation of more up to date statistics. While the data would be gathered for two different purposes, one would support the other.

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

Response

Ideally, yes.

Within the State and in Europe this for the most part is not a problem. It is when packaging waste is sold on to brokers in Europe and is comingled with waste from other EU Member States and then sold on to market outside of the EU that it becomes more difficult to track it to its final destination. In this regard, Repak has systems in place and carries out site visits to verify final destinations outside of the EU. The TFS Office is also pro-active on this issue and there may be scope for closer co-operation between the various state agencies and PROs to share data and tighten up the system.

Within Ireland the tracking systems is unique in that the waste industry is private in the main and already has weight based system in place that is provided at customer level.

- Are there confidentiality or other issues for industry in reporting on waste flows?

Response

Some operators in a competitive market, may consider their individual data as commercially sensitive. This should not be a barrier or excuse to necessary reporting. The individual data of any business need not be placed in the public domain and measures could be put in place to reassure operators that only global data will be publically available, thereby protecting any commercially sensitive data.

- What changes need to be put in place to facilitate better reporting?

Response

Reporting should not be overly complex and maximum use should be made of technology and modern reporting, user friendly, systems.

- What uses can be made of having more detailed, accurate, timely data?

Response

Planning: Having more data means being able to plan better for the future. Knowing what is coming on stream means potentially being able to adjust and adapt in a timelier fashion to requirements.

Development: more information means more potential for education. More potential to affect consumer behaviour in terms of encouraging recycling. More potential to affect producer behaviours in terms of light weighting and the increased use of renewable/recyclable packaging materials.

- What penalties should be in place for the non-provision of data?

Response

This requires legislative support for PRI's schemes and or Local Authorities in the case of self-compliance to facilitate auditing and penalties to be applied where producers do not provide data. Likewise, similar legislative support is required for PRI schemes and LA's for the reporting of data for waste operators.

Fixed fee financial penalties should automatically apply until reporting compliance issues are addressed.

- Should there be voluntarily reporting on particular waste streams and its treatment destination prior to legislative changes being put in place?

Response

Yes, many waste operators would be willing to provide this information. This data would be of significant benefit and seeing it as soon as possible would also help to plan systems for data collection when legislative changes do take place.

11. Consumer Protection & Market Monitoring

Repak supports the proposals to expand the Price Monitoring Group (PMG) monitoring remit and to add a section to MyWaste.ie where consumers can compare household collection charges, as these are in the public interest.

We also support the proposals to strengthen the current customer service charter and facilitate households and business to easily access and compare prices and service levels, as these are in the public interest.

Consultation Questions Protection & Market Monitoring

- CCPC recommendation for the establishment of an economic regulator for household collection waste?

Response

Given the complexity of the waste collection market, there is a need to ensure we have a sustainable, efficient model that is capable of achieving the new EU recycling targets and that protects the interests of household consumers.

The CCPC recommendation for the establishment of an economic regulator represents a significant change for the waste sector and may not be the optimum solution. An alternative approach would be to expand and enhance the role of the Price Monitoring Group (PMG), coupled with KPI reporting from all waste operators on their recycling performance from householders to ensure the best environmental and economic outcomes, in the interest of all stakeholders.

- Do you believe the information currently available on kerbside waste collection could be improved, and if yes, how?

Response

Yes, this information could be improved by widening it to include all waste operators, achieving streamlining of pricing models to three or four instead of the current nine, and publishing the information in a more user friendly format for consumers – for example, the current lists of changes to fees do not indicate which pricing structure each operator is using, and are anonymised, so do not allow consumers to compare like with like.

- Do you believe that the information prepared by the PMG is useful? If No, what changes would you like to see?

Response

Yes, it is useful, but is somewhat restricted currently. The PMG should have a wider remit and more clout. An example of how the information would be more useful would be to show the average cost per operator over a year, showing their pricing model. The proposal to publish information on MyWaste.ie is very positive.

- Given that the last time flat fees were identified was July 2018, do you believe the work of the PMG should continue?

Response

Yes, it is very important for consumers that this Group continues its work and is given a wider remit. The remit of the PMG should be extended to inform and advise on policy changes to effect improvements.

- Would you support the Group undertaking whole of market monitoring, including publishing prices for household waste collection for all collectors in all areas?

Response

Yes, the work of the PMG is well established, credible with existing stakeholders and transparent. The work should continue and its remit extended to monitor commercial waste operator pricing. This will dovetail with extending the work of the PMG in the household area also.

- Do you believe there needs to be further oversight of the waste sector from a consumer rights perspective?

Response

Yes, to achieve consistencies and transparency in pricing models and customer service, as well as information, materials accepted and the colour of bins. Also considering how we achieve environmental benefits in the public interest, such as increasing the sustainability of collectors' fleets, at a time when we are aiming to reduce carbon emissions etc.

- Do you believe that a consumer complaints body should be put in place? If yes, what powers would it have?

Response

Yes, this could be under the remit of the PMG with additional resource provision.

- Should it be included within an existing body?

Response

Yes, as outlined above.