



RGDATA submission to the Public Consultation on the Waste Action Plan for a Circular Economy

Via email: Wastecomments@DCCAE.gov.ie

Date: Friday 21st February 2020

Dear Sirs,

The Retail Grocery Dairy & Allied Trade Association (RGDATA), as the national organisation representing the independent retail grocery sector for 4,000 independent shops, convenience stores and supermarkets is pleased to make this submission on the Waste Action Plan for a Circular Economy.

We note that the consultation at this stage is at a very high level and that some aspects of the issues under review do not directly relate to activities directly concerning our members (for instance construction and textiles). Consequently, the comments included on the table below focus on our observations on areas of direct relevance.

RGDATA would be happy to work with the Department in the development and implementation of a nationwide waste action plan.

Yours sincerely,

Tara Buckley

Director General

Specific RGDATA comments by reference to key areas of relevance identified in the Request for Submissions

2.1	Institutional Arrangements	<p>Institutional structures should be streamlined to focus on effective engagement with consumers and businesses – at present there is a plethora of different agencies and entities with different roles in waste management with no single customer/business facing entity responsible for engaging with the stakeholders who have to make key choices on how waste is managed each day, either in a business or personal context.</p> <p>The institutional arrangements also need to be directly focused on addressing practical challenges that consumers and businesses face in the circular waste economy – in other words making proposals or solutions that are rooted in practical arrangements that directly impact on consumer/business behaviour. Specifically, it is important that measures are only introduced where there is a circular waste recovery stream.</p> <p>It is also vital that institutional arrangements should be effectively co-ordinated so that some institutional actors do not go off on solo runs by unilaterally introducing new measures or requirements in isolation from either regional or national initiatives. For instance, one would question the value of a specific local authority introducing new requirements on the management of specific waste streams which are in isolation from a broader based initiative which has both buy-in across sectors and regions. While enthusiasm on achieving a circular waste economy is laudable, it needs to be rooted in practical institutional structures and arrangements to deliver real improvements.</p> <p>The State and public authorities also need to lead by example to demonstrate their commitment to a circular waste economy. Practices within public sector bodies should demonstrate that the public sector is applying new approaches when engaging with consumers and businesses.</p>
3.7	Municipal Waste	<p>Further measures are needed to promote and incentivise waste prevention and improve proper segregation and recycling of waste by both households and businesses.</p> <p>There are two key deficiencies at present – poor and disjointed levels of communication/engagement with consumers and businesses on best practice and additional waste infrastructure provision to support best practice. For instance, there is little point in encouraging the segregation of waste in homes, especially higher density units, if the</p>

		<p>infrastructure is not in place to collect and service such waste. Equally there is little point in imposing new obligations on retailers around the use of specific materials if the infrastructure to support their segregated collection and recycling is not available.</p>
3.9	Commercial waste	<p>In terms of creating a circular waste economy for commercial waste it is imperative that pricing structures, new practices and relevant taxes and levies to influence behaviours and choices can be based around accessible and substitutable alternatives – there is no point in penalising behaviour when there are no practical alternative choices to be made.</p> <p>Pay by weight charging for waste generated by commercial businesses will only be effective where the relevant infrastructure and services are available to allow recyclable waste to be collected and processed and where suppliers and producers utilise sustainable packaging choices for products that they put onto the market through retailers.</p>
4.7	Food Waste	<ul style="list-style-type: none"> • Causes of food waste The primary causes of food waste from the household include poor consumer awareness on food planning, storage and use, as well as over purchasing of perishable food. Education and awareness of sustainable practices in food purchasing and consumption would undoubtedly assist with reducing levels of food waste. • Problems with food waste are exacerbated by poor processes for the storage and collection of food waste so that it can be recycled and the nutrient content captured through composting or anaerobic digestion. Regrettably deficiencies in this regard have led to high levels of food waste going to landfill. • Ireland should introduce a national prevention target for food waste in advance of a possible EU target and work to achieve this target through an integrated and focused programme of awareness, supports and investment in relevant waste infrastructure. • Greater education and infrastructure improvements will help Ireland become a farm to fork champion in reducing food waste.
5.7	Plastic and Packaging Waste	<ul style="list-style-type: none"> • How can we make it easier for citizens to play a role in delivering on our targets? <p>There are a number of steps that can be taken to help citizens meet our targets but based primarily on a mixture of creating better compliance through the provision of information and education. A second key approach is through incentivising consumer behaviour through encouraging positive behaviours and penalising bad behaviours where</p>

		<p>substitutable choices can be made. There is also a need for some broader regulatory interventions to secure significant societal changes, for instance through banning single use plastics nationally with a programme to incentivise the use of non-plastic alternatives.</p> <ul style="list-style-type: none"> • Do waste collectors have a role to play? Clearly as the primary processors of waste, the collection companies have a role in helping to develop and encourage good consumer practices and behaviours. They can achieve this through providing information on recycling – at present the high levels of soiled recyclable waste and waste which cannot be recycled suggests that consumer awareness levels are very low and need improvement. • What is the role of retailers? Retailers have a role to play in supporting the use of recycling and minimising food waste through facilitating and supporting public awareness campaigns on waste prevention and recycling. Additionally, retailers can encourage suppliers and producers to reduce the waste arising from products through offering more sustainable more sustainable products/packaging with less plastic or plastic alternatives. • What is the role of manufacturers? Manufacturers and suppliers have a key role to offer more sustainable products/packaging with less plastic or plastic alternatives. • Is there a role for voluntary measures (individual or by sector) and if so, what might they be? Some voluntary measures can be useful, but the scale of transformational change in behaviours and the associated infrastructure provision required will need a far greater focus than merely relying on voluntary measures. The systemic change required will need co-ordination, direction and investment. • Are there targets other than EU that we should be striving towards? No • Is the introduction of eco modulated EPR fees sufficient to eliminate excessive or difficult to recycle plastic packaging? Yes.
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6.6	Single use plastics	<ul style="list-style-type: none"> • What measures could be considered to reduce the amount of single use food containers we use, taking the provisions of the Packaging Directive into account? Should a ban on non-reusable cups be explored? Single use plastic food containers should be banned and non-compostable cups should be banned • Are there measures already in place that could be strengthened by legislation – for example, obligating retailers to give a reduction to consumers who use re-useable ware? Retailers need choice to provide alternatives to single use plastics. They also need time to adopt to any new changes to single use plastics and to ensure that any new schemes or regulatory measures do not introduce a disproportionate regulatory burden. • Do retailers have role to play in exploring viable reusable food containers for on the go consumption? Retailers are responsible corporate citizens and will work hard to use sustainable and effective materials for customers. It is important that viable, safe, hygienic and cost-effective containers are available to facilitate the sale of food for on the go consumption before any new regulatory requirements are introduced to secure compliance. • The role of levies in reducing our consumption is well documented. However, in the case of plastic bags, the levy was applied to a commodity which had previously been available for free. Given the range of prices involved for commodities sold in SUP food containers and beverage cups, do you believe a levy would affect behavioural change? Yes. It changed the use of plastic shopping bags. However, levies are only effective when alternative choices are available to influence consumer behaviour. • Can our current co-mingled collection model be enhanced in order to deliver a collection rate of 90% for PET beverage containers? It is worth reviewing what can be achieved through engagement with retailers and their trade organisations. Some retailers may struggle to facilitate a PET collection scheme which involves additional costs to the fees already paid to a retailer compliance scheme such as REPAK. Any new obligations must be proportionate and not undermine the operation of a Producer Compliance Scheme.
7.7	Circular Economy	<ul style="list-style-type: none"> • What are the areas with greatest potential for transformation in Ireland under the Circular Economy?

		<p>From a retail grocery perspective, the areas for greatest transformation include the reduction in food waste and the reduction in plastic packaging and Single Use Plastics.</p> <ul style="list-style-type: none"> • What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors? Higher levels of consumer awareness brought about by education and information. Specifically, there needs to be improved labelling of recycling packaging. Many consumers are confused or do not understand recycling labels. • What might be a meaningful national waste reduction target and how could it be achieved? This is a matter that is broader than just the retail grocery sector which RGDATA represents and requires a realistic assessment of what can be achieved on a realistic basis right across the national economy in light of current practices, existing infrastructure, substitutable alternatives and developments in sustainable packaging internationally. • 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? Two elements that need to be addressed include improved information and awareness campaigns on recycling as well as greater incentives on manufacturers to produce more sustainable/recyclable packaging.
8.7	Citizen Engagement	<ul style="list-style-type: none"> • What campaigns would better assist householders and businesses in preventing and segregating waste properly? <p>There are a range of campaigns and initiatives that would assist consumers and business to segregate their waste – all of which have the following elements;</p> <ul style="list-style-type: none"> ○ Clear communications on “how and why” ○ Link targets to local areas – town, parish, school, club ○ Introduce awards/recognition scheme ie- Tidy and Sustainable Town Awards ○ Giving target audiences practical reasons on how they can make a difference through changed practices

		<ul style="list-style-type: none"> ○ Infrastructure provision – having an effective means for citizens to effectively and sustainably manage their waste. ○ Cost and convenience - ensuring that substitutable alternatives are available to consumers which allow them make more sustainable choices without additional costs. ○ Relevance and scale – to demonstrate that individual effort makes a difference at a national level despite international climate challenges ○ Engaging adults to change practices – getting children mobilised is key <ul style="list-style-type: none"> ● Should this be funded by Government or should the sector play a role in funding campaigns? <p>This is a public information matter and should be funding by government. Industry and business will play a part but the drive for effective campaigns must be led by Government.</p> <ul style="list-style-type: none"> ● Waste Collectors have a condition in their permits to maintain on-going communication with their customers in accordance with their customer charter. Do you agree that collectors are giving sufficient information to their customers in relation to separating waste into the 3 bins? <p>No, collectors are not fulfilling this commitment effectively. There is still a lot of confusion about what can go into each bin.</p> <ul style="list-style-type: none"> ● Do you think information stickers for bins showing what’s accepted in each bin should be rolled out to all households? Yes.
9	Construction and Demolition Waste	N/A
10	Textiles	N/A
11.7	Waste management infrastructure	<ul style="list-style-type: none"> ● Should one national waste management plan be produced in place of the 3 current plans? - Yes ● Should the regional offices be set up on a statutory basis? - Yes ● Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded? – Yes and funded through allocation from the landfill levy.

12	By-products	N/A
13	End of waste	N/A
14.5	Exemptions	N/A
15	EPR	In relation to EPR, Ireland should not move ahead of Europe. Also, the implications of Brexit must be taken into account. How will that work given that we buy a significant number of products that would come under EPR from the UK?
16.5	Waste enforcement	All waste enforcement laws should be rigorously applied and adhered to. Any companies or individuals who breach our waste enforcement laws should face prosecutions. Stronger penalties should be introduced for those who breach waste enforcement laws. It undermines compliance for lawful operators to see the wholesale disregarding of the law by fly by night operators who do not comply with the law and are not prosecuted.