1.0 Introduction

The following is a submission under the consultation process requested by the Public Consultation Waste Action Plan for a Circular Economy.

The submission is made by Roadstone Ltd which is Ireland's leading supplier of aggregates and construction building materials.

Roadstone operates a number of construction and demolition permitted facilities and inert soil and stone waste licenced facilities at its locations throughout Ireland.

The submission refers to three specific chapters of the document "*Public Consultation Waste Action Plan for a Circular Economy"*, as follows:

- Chapter 9: Construction and Demolition Waste
- Chapter 12: By-Products
- Chapter 13: End Of Waste

2.0 Consultation Questions Construction and Demolition Waste

- **What other measures need to be put in place to encourage all players to prevent and recycle waste from construction?**

a) The use of recycled aggregates from construction and demolition waste is hampered by the lack of a national end of waste criteria for such materials.
b) The lack of government policy to promote the use of recycled aggregates in construction and infrastructure projects is an impediment to the use of recycled aggregates.
c) The correct application of by-product status for inert soil and stone will ensure material that should not be classified as waste does not enter the waste cycle.

- **What existing measures are in place that could be improved?**

a) There are a significant number of quarries with waste permits for construction and demolition waste. The lack of end of waste criteria determinations has effectively closed the majority of these facilities.
b) The enforcement of waste legislation to control the unauthorised use and disposal of construction and demolition waste is insufficient. Increased resources to allow for more consistent enforcement across planning authorities would lead to improvements.
c) The delay in the granting of waste licenses for soil recovery sites impeded the industry to recover the volumes of inert soil and stone that cannot be addressed under the by-product process. The lead in time for getting the required planning permission and waste licence for an inert soil and stone waste recovery facility can be up to 4 years.
d) Inert soil and stone volumes should be tracked separately to other construction waste streams as the large volumes of inert soil and stone distort the actual figures in relation to recycling. The inclusion of soil and stone tonnages that are recovered at licenced facilities distorts these figures. This material is recovered by the backfilling of worked out

quarries/sand pits and allows for their reinstatement and reuse of the lands and should be removed from the waste stream if used in such circumstances.

- **What changes could be made to environmental and/or planning legislation to facilitate more recycling of construction waste?**

a) The majority of construction and demolition waste facilities for governed by waste permits issued by the local authorities. There is a vast divergence between the licenses issued by various local authorities. There should be a consistent approach to conditions imposed under waste permits by all local authorities.

- **What incentives could be introduced to increase the use of recycled materials?**

a) The promotion of recycled aggregates with the building and civil engineering industry should be undertaken by relevant government bodies.

b) The training of engineers and architects in the use of recycled materials within construction projects should increase the use of such materials.

c) Waste charges should be increased for the disposal of mixed construction and demolition waste to encourage the recycling of such materials.

- **Should levies be applied to the use of virgin material where a recycled material is available as an alternative?**

a) The volume of materials to be recycled into aggregates could only generate approximately 3% of the total volume of aggregates required. The imposition of a levy onto virgin material would only increase the cost of the delivery of infrastructural and residential projects.

- **How can site managers be encouraged to ensure more on-site segregation? What financial incentives / penalties could be introduced to encourage better waste management practices?**

a) *The waste impacts of a construction project should be considered at the very early stages of the design process of a project. This will enable the required information to be collected to maximise the volume of construction and demolition waste to be recycled or processed within By-product / waste permit / waste licence facilities*.

b) *The training of site managers on the proper segregation of waste.*

c) *Increasing the cost of disposal of mixed construction and demolition waste will promote more recycling.*

- **What are the best approaches to raising awareness and education?**

a) Training across the construction industry from the design engineer and architect to the site supervisor will raise more awareness.

b) An emphasis on the consideration of waste at the earliest possible stage within the design process will focus attention to the issues of construction and demolition waste within a construction project.

- **What are the barriers/enablers to these measures?**

a) The lack of legal outlets for recycled aggregates from construction and demolition waste is a barrier at present.
b) The delays in the granting of planning permissions and waste permits/ licences are barriers.

- **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?**

a) The extractive industry have the facilities and technical knowledge to accommodate the main waste streams such as soil/stone concrete macadam and asphalt that arise from construction projects.
b) The regulatory framework to allow the operation of facilities to process construction and demolition waste requires quicker decision making.

3.0 Consultation Questions By-Products

- **How do you think the By-product process could be improved?**

a) The By–product process outlined in recent EPA guidance for soil and stone can operate effectively if applied correctly. The ambiguity regarding the notification process which allows an article 27 to proceed (albeit at some risk) without final notification from the EPA creates difficulties for enforcement authorities.
b) Earlier engagement by developers/engineers in the requirements for the management of waste arising from projects at the design stage would lead to better outcomes. Significant information and work is required for a material to be designated By-product status.
c) Training on the current application of the By-product process to all stakeholders would improve this process and enable the correct classification of material currently at risk of being classified as waste.
d) Tracking and validation of By-product classified material will provide statutory bodies such as local authorities with more confidence in this process.

- **Do you support the introduction of fees to assess by-product notifications?**

a) The introduction of fees would be welcomed on the understanding that a quick response to applications submitted for consideration is forthcoming and used to speed up the determination / notification process and provide for enforcement and a tracking and validation process of By-product classified material.

- **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?**

a) The By-product process is a means of handling large volumes of uncontaminated soil and stone that arises from construction projects. However, there is still also a requirement for waste licence recovery facilities for inert soil and stone. The provision of both types

of facility allows a comprehensive solution for the processing of inert soil and stone that arises from all construction projects.

4.0 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?**

a) Yes.

- **If yes**
- **what expertise would be necessary for such a team**,

a) Such a team would need to have Planning, Engineering, Extractive industry and Waste Regulation expertise.

- **who should be represented,**

a) Irish Concrete Federation, Engineers Ireland, EPA, Consulting Engineering bodies, Local Government Planning Representatives , Regional Waste Authorities.