

21 February 2020

Waste Action Plan Consultation,  
Waste Policy and Resource Efficiency,  
Department Communications, Climate Action & Environment,  
Newtown Road,  
Carricklawn,  
Wexford,  
Y35 AP50.

By email only to [Wastecomments@DCCAIE.gov.ie](mailto:Wastecomments@DCCAIE.gov.ie)

Dear Sir/Madam

### **Re: Public Consultation on the Proposed Waste Action Plan**

SLR Consulting is a member of Cré but does not support the Cré submission to this consultation. Having reviewed the Cré submission, we note that it contains a number of factual errors and misleading data. These were pointed out to the Board of Cré and have been disregarded, so we feel it is important to point them out in this short submission in the interest of transparency and accuracy.

#### The Cré submission states that :

*“Indecon for the Department of Environment, Community and Local Government in their 2011 Regulatory Impact Analysis<sup>1</sup> for the European Union (Household Food Waste and Bio-waste) Regulations 2013 (RIA) predicted that by 2017, there would be 231,265 tonnes collected. Actually only in the region of 124,527 was collected, 54% below the predicted tonnage by Indecon.”*

#### SLR Comment:

Indecon over-estimated the number of houses that would have a brown bin in agglomeration >500. They said 1,119,178 houses in agglomerations of >500 would be provided with a brown bin, when there are only about 800,000 houses in agglomerations of >500 that have a kerbside collection service. They also assumed that home-composting would count, which it currently does not. If you subtract home composting and reduce pro-rata from 1,119,178 down to 800,000 houses, you get c.137Kt, which is a reasonable estimate and will probably be reached this year. In reality, 124Kt out of 137Kt is 90%, so Cré’s 54% figure is not an accurate reflection of the situation.

#### The Cré submission states that :

*“Based on Department and EPA figures, it is estimated that there is potentially 560,000 tonnes of brown bin material available in Ireland with only in the region of a third of this currently collected.”*

---

<sup>1</sup> Statement of Regulatory Impact Analysis Waste Management (Household Food Waste Collection) Regulations 2011. Department of Environment, Community and Local Government, Prepared by Indecon, June 2011

SLR Comment:

The relevant figure is not one-third, it is actually 50% when you include biodegradable garden and parks waste and also home composting. This could be increased significantly if we captured an additional 250Kt of biodegradable garden and parks waste, which would be equivalent to Germany and Wales on a pro-rata basis. We would then have captured 550Kt out of 810Kt, which is 68% or if we excluded home composting, we would have 510Kt out of 770Kt which would be 66%.

The Cré submission states that :

*“The National Strategy on Biodegradable Waste has a performance indicator for Biological Treatment Tonnage Treated of 331,597tonnes by 2016. Ireland did not meet this performance indicator.”*

SLR Comment:

The 2006 strategy assumed that Ireland would collect a large amount of biodegradable garden and parks waste. However, the focus has been on the collection of food waste and the home composting of garden waste. We do not consider this to be a performance indicator. It is more a case of a revised national strategy, which can be considered further in the current consultation.

The Cré submission states that :

*“A survey from RED C Research has found that despite legislation for the last ten years requiring businesses to have and use a food waste bin, only 3 in 4 said they have a food waste bin.....”*

SLR Comment:

The 2009 legislation on commercial food waste did not require every business to have a food waste bin. The mandatory requirement was limited to the following businesses:

- restaurants, cafés, bistros;
- hotels, guest houses and hostels;
- public houses;
- factory (and other) canteens;
- educational institutions;
- shops and supermarkets with deli counters;
- hospitals and nursing homes;
- State buildings including Garda stations, prisons, barracks, offices, etc; and
- Stations, airports, ports, harbours, marinas, trains and boats.

The above list only applies to facilities where food is supplied and some exemptions are included based on size, scale and/or longevity of the activities.

Other businesses are not required to have a food waste recycling bin. In this context, the fact that 3 out of every 4 businesses have a food waste bin should be seen as a positive result.

The Cré submission states that :

*“The CCPC has estimated that by 2016 only 50% of all households with a scheduled service had an organic waste bin.”*

And

“19 of the 31 local authorities had provision rates below 50%”

SLR Comment:

The regulations require that brown bins are rolled out to households in agglomerations of 500 people or more. This is approximately two-thirds of households with a scheduled service. So in 2016, the compliance level was 75%, rather than the suggested 50%. Anecdotally, we believe that the compliance level is now well above 90%.

The Cré submission states that :

*“The EPA’s 2018 Waste Characterisation report found that 14% by weight of brown bin collections was non-target material.”*

SLR Comment:

The non-target materials include biodegradable materials such as soiled paper and biodegradable fines. The Non-biodegradable materials is a better measure of contamination and was found to be 8.2% on average.

The Cré submission states that :

*“Ireland is out of sync with some other countries on the frequency of food waste collection. Other countries do it weekly, whereas the majority of food waste collections in Ireland are NOT weekly.”*

SLR Comment:

The collection of food waste varies a lot across Europe. Many countries have no food waste collections and only very few have weekly collections. The demographics are quite different across Europe so we do not expect every country to engage in identical practices. In comparison with the rest of Europe, Ireland has a low population density, a high rural population and a low level of apartment/flat dwellers. We therefore need solutions that work for our demographics, not solutions that are based on the experience in countries with different demographics.

SLR published a report in 2018 that benchmarks Ireland’s household waste collection against other western European countries. The report is available [HERE](#). Some observations are as follows:

Weekly collections of food waste are common in Great Britain, but not in Northern Ireland , where fortnightly is the norm.

Household food waste collections are not mandated in Denmark, where the focus is on separately collected dry recyclables.

Germany, with the highest recycling rate in the world, has fortnightly biowaste collections in most cases.

Biowaste is rarely collected in France.

Italy has more frequent food waste collections in the south than in the north due to the hotter climate.

The Cré submission states that :

*“Under the commercial food waste regulation section 9 (4), on an annual basis (at year end of Dec), waste collectors are obliged to provide to Local Authorities, a list of those clients not availing of the brown bin service. The Local Authorities are not enforcing this measure.”*

SLR Comment:

This legislation should be amended. In many cases, businesses use specialised firms for food waste recycling, so the company that collects the dry recyclables and residual waste, do not always collect the food waste. It is unfair and unreasonable to expect waste collectors to investigate their customers to determine if they have a food waste collection.

Yours sincerely  
**SLR Consulting Ireland**



**Conor Walsh**  
Technical Director