

# PRE-DRAFT SUBMISSIONS REPORT

For Preparation Of The National Waste  
Management Plan For A Circular Economy





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# 1.0 INTRODUCTION & CONSULTATION PROCESS

## 1.1 Introduction

This Pre-draft Consultation report has been prepared on behalf of the three Regional Waste Management Planning Offices, Connacht-Ulster Region, Eastern-Midlands Region and Southern Region.

The lead Local Authorities in the three Waste Management Planning Regions are as follows:

- Connacht-Ulster Region: Mayo County Council
- Eastern-Midlands Region: Dublin City Council.
- Southern Region: Limerick City & County Council joint with Tipperary County Council

The purpose of this report is to review the submissions and consider the issues raised, respond to the issues and consider their inclusion in the National Waste Management Plan for a Circular Economy.

## 1.2 Background

Waste management planning is the responsibility of the local authorities under Part II of the Waste Management Act 1996 and in June 2013, the three waste management regions of Connacht -Ulster, Southern, and Eastern-Midlands were established. In May 2015, each of the three regions published a Regional Waste Management Plan (RWMP) to cover the period 2015 to 2021.

A series of objectives, policies and actions in the RWMP set the framework for the prevention and management of wastes in a safe and sustainable manner in each region. These are administered by three Regional Waste Management Planning Offices (RWMPO).

## 1.3 Ireland's next Waste Plan

Ireland's National Waste Policy 2020 – 2025 'A Waste Action Plan for a Circular Economy' calls for the replacement of the existing Regional Waste Management Plans with a single National Waste Management Plan for a Circular Economy, containing targets for reuse, repair, resource consumption and a reduction in contamination.

The single plan will aim to build on the progress from 2015, strengthen national capacity and delivery while retaining a regional focus for implementation.

While the defined legislative requirements for waste management plan content are prescriptive under Section 22 of the Waste Management Act, the replacement plan structure needs to provide an adaptable clear framework for delivery. The RWMPO has previously proposed setting out an alternative thematic approach to the plan promoting themes as described below.

Such a thematic approach will be a departure from the current target and objective-led structure in the existing RWMPs, however, this approach will help to set more meaningful and thematic led targets to drive the improvements needed. This thematic approach is recommended for the replacement plan while ensuring all of the legislative requirements are suitably addressed.

### 1.3.1 Key Themes

For the new single National Waste Management Plan for a Circular Economy, current suggested key themes are outlined below but may be subject to change as the plan consultation phase develops.

#### **Circularity**

Circularity is the thread that ties the themes of consumption, compliance and capture together in the context of the National Waste Management Plan for a Circular Economy.

#### **Consumption**

*“the action of using up a resource”*

Consumption is at the heart of all waste generation. In simple terms the more we consume the more waste we potentially produce. The National Waste Management Plan must focus on consumption in all its forms through existing and new initiatives.

#### **Compliance**

*“the act of obeying an order rule or request”*

Compliance is at the heart of all waste management practices. In simple terms if we comply with the rules and guidance for waste management, we will achieve our ambitions. The National Waste Management Plan must focus on enabling compliance in all its forms from participation in authorised services to the promotion of personal responsibility for waste produced.

#### **Capture**

*“the process of collecting a natural product so that it can be used”*

The process of capturing or harnessing waste materials so that they may be processed, recycled, reused, recovered or disposed of in a sustainable way is at the heart of protecting the environment. The National Waste Management Plan must focus on the capture of materials from kerbside collection to civic amenity sites to promote sustainable circularity.

## 1.4 Consultation Process

The process of the preparation of the new National Waste Management Plan for a Circular Economy (NWMPCE) commenced with the publication of a notice of intention to commence preparation of the new NWMPCE, in accordance with Section 22 of the Waste Management Act, 1996 and the Waste Management (Planning) Regulations, 1997, on the 11th March 2021 in the following national papers – Irish Examiner, Irish Independent, The Irish Sun, The Daily Mail and The Irish Times (refer to Appendix A for copy of notice).

For the purpose of Section 23(1) of the Waste Management Act, 1996 a copy of the notice was forwarded to the following parties:

- All Local Authorities in Ireland
- Dept. Of Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Department of Agriculture, Food and Marine
- An Taisce
- Fáilte Ireland
- Teagasc
- Department of the Environment, Climate and Communications
- Department of Housing, Local Government and Heritage
- National Waste Collection Permit Office (NWCPO)
- National Transfrontier Shipment Office (NTFSO)
- Environmental Protection Agency (EPA)
- Waste Enforcement Regional Lead Authority Southern Region (WERLA SR)
- WERLA Connacht – Ulster Region (WERLA CUR)
- WERLA Eastern – Midlands Region (WERLA EMR)
- CRÉ
- District and Borough Councils in Northern Ireland

Notifications were also circulated to other relevant stakeholders.

In addition, the public notice was posted on [www.mywaste.ie](http://www.mywaste.ie) and associated social media. The public were invited to make their submissions through an online questionnaire on [www.mywaste.ie](http://www.mywaste.ie) as an alternative to submitting their proposals in writing or by email to the Southern Region Waste Management Planning Office (SRWMPO). The SRWMPO received the submissions on behalf of the RWMPO. Members of the public and all stakeholders had until the 6th May 2021 to make a submission, in relation to the preparation of the plan. This report summarises the submissions received by the Regional Waste Management Planning Offices.

# 2.0 WRITTEN SUBMISSIONS

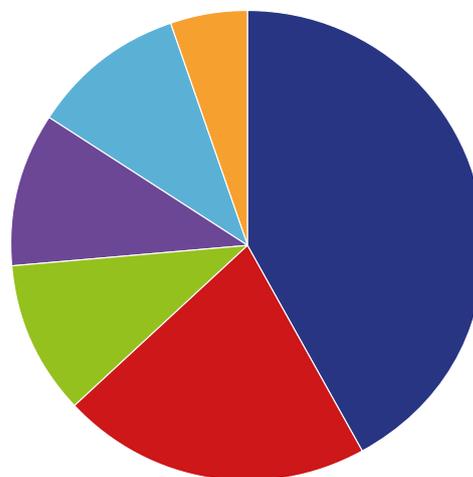
## 2.1 Submissions Received & Summary of Issues Raised

A total of 19 written submissions were received at the SRWMPO either through standard mail or email. In addition to these, submissions were also received through the online questionnaire on [www.mywaste.ie](http://www.mywaste.ie). An analysis of these questionnaires is provided separately in Section 3.

An overview of the source and number of written submissions is presented in Table 2.1 and Figure 1.

**Table 2.1** Written submissions for pre-draft consultation for NWPCE

Type	No. of Submissions	% Submissions
Representative Org	8	42.1%
Waste Operator	4	21.1%
State Organisation	2	10.5%
Action Groups	2	10.5%
Individuals	2	10.5%
Business	1	5.3%
<b>Total</b>	<b>19</b>	<b>100.00%</b>



- Representative Org
- Waste Operator
- State Organisation
- Action Groups
- Individuals
- Business

**Figure 2.1:** Sources of written submissions for pre-draft consultation for NWPCE

## 2.2 Issues Raised in Written Submissions

The following presents a summary of the issues raised in the 19 written submissions, which were mainly from waste industry, business and community organisations. The issues are grouped according to the themes, with some appropriate subheadings, that have been identified as key under the new thematic approach for the preparation of the National Waste Management Plan for a Circular Economy. The themes identified are as follows:

- Circularity:** binding the following other themes together
- Consumption** of materials and generation of waste;
- Compliance** with relevant waste management laws and policies; and
- Capture** of waste materials for treatment.

## 2.3 CIRCULARITY

Table 2.2 Circularity

Subcategory	Summary of submissions received
Circularity in General	<p>All submissions highlighted how waste prevention and management activities should link with the Circular Economy. All activities should be structured and implemented so that circularity is at an optimum and disposal at a minimum.</p> <p>The following are just some of the particular points made:</p> <ul style="list-style-type: none"> <li>• The National Waste Management Plan for a Circular Economy is being prepared at a pivotal time for waste management, with the recent publication of the Waste Action Plan for a Circular Economy policy; the drafting of a national Circular Economy Strategy and EPA’s Circular Economy Programme; and the transposition of circular economy legislation into national law.</li> <li>• Ireland now has the opportunity to introduce systemic change in waste management through policy and planning to drive circular economy and climate action in Ireland.</li> <li>• This new ambition, which puts prevention (including avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of resource efficiency planning.</li> <li>• The opportunity for all island approaches to targets for both reuse and circular material usage rates and/or circularity gap closure should be explored.</li> <li>• The forthcoming plan needs to take into account the fast-changing world of the circular economy and allow for flexibility to adapt to changing technologies and practices.</li> <li>• Products sold to consumers must be “Designed and Made for the Circular Economy” and not made for disposal</li> <li>• The overriding priority is in the area of producer responsibility and to bring the Polluter Pays Principle back to the manufacturers and retailers.</li> <li>• Better engagement is needed with the main stakeholders, including especially the waste industry.</li> <li>• For the Circular Economy, it is vital to follow the 8 Rs: Refuse, Reduce, Reuse, Repair, Reclaim, Recirculate, Recycle, Re-earth/Rot.</li> <li>• It is critically important that recycling is made easy for the consumer, is supported through sorting / processing and is financially attractive for business.</li> <li>• Instead of planning for expansion of end of pipe solutions, such as waste to energy plants or cement kilns, Ireland must invest in more materials-based, regenerative approaches that write ‘waste’ out of the vernacular.</li> </ul>

**Response and Recommendations of RWMPO:**

- It is recommended that the NWPCE focus strongly on implementation of the circular economy approach which is the cornerstone of current and future EU and national waste policy, legislation, guidance and codes of practice.

- It is envisaged that this transition to a circular economy will help to deliver, increased national self-sufficiency including for waste management. It is recommended that waste management self-sufficiency, in the Irish context, be given increased focus during the next Plan period.

## 2.4 CONSUMPTION of materials and generation of waste

### 2.4.1 Prevention

Table 2.3 Prevention

Subcategory	Summary of submissions received
Packaging	<ul style="list-style-type: none"> <li>• Several submissions referred to reduction of packaging waste</li> <li>• Guidance on implementation of Single Use Plastics (SUPs) reduction measures will be needed.</li> <li>• Some caution was expressed that 'packaging free' and other packaging restrictions could lead to spoilage of certain products e.g. food.</li> <li>• Business needs support in their ongoing work to reduce packaging</li> <li>• More onus is needed on producers to minimise waste packaging</li> <li>• Address the fact that Ireland has the highest plastic waste per capita</li> <li>• Zero Waste Options should be considered in retail</li> <li>• Ecommerce should be assessed for overpackaging</li> </ul>
Education & Awareness	<ul style="list-style-type: none"> <li>• There were several submissions stressing the need for ongoing development of education and awareness programmes including mywaste.ie.</li> <li>• Pilot studies are important</li> <li>• Engagement with relevant stakeholders will be important, including citizen awareness programme and community initiatives e.g. Zero Waste</li> <li>• Education is needed on packaging labels and effective waste segregation</li> </ul>
Reuse	<ul style="list-style-type: none"> <li>• A number of submissions proposed specific targets to encourage reuse.</li> <li>• Initiatives such as Reuse Month and ReMark were encouraged.</li> <li>• There is a need for better access to expertise and skills for repair and reuse.</li> </ul>
Food Waste	<ul style="list-style-type: none"> <li>• Submissions on food waste included the significance of the target of 50% reduction in food waste by 2030 as per Government Waste and Climate Action Plans and the Sustainable Development Goals.</li> <li>• Consultation with stakeholders is essential, using a Farm to Fork approach. Different food waste prevention campaigns should be aligned for greatest effect.</li> <li>• Brown bin roll-out in a practical manner is largely welcomed.</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Specific measures such as placing of microfiber filters in washing machines</li> </ul>

### **Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, Strategic Objective B of the current Plan will remain relevant for the NWPCE.

Strategic Objective B states the following:-  
*Prioritise waste prevention through behavioural change activities to decouple economic growth and resource use.*

- The RWMPO will continue to engage closely with reuse initiatives such as CRNI.

- There is a clear need for effective messaging to exact more pronounced behaviour change.
- Prevention policy will be fully aligned with the policies presented in Ireland's Waste Action Plan for a Circular Economy as well as the National Circular Economy Programme prepared by EPA.
- Adoption of the food waste hierarchy as a priority order in food waste prevention and management. The new NWMPCE will also consider the role of the food waste hierarchy in designing and implementing policy measures *to halve food waste generation by 2030.*

## **2.4.2 Resource Efficiency**

**Table 2.4 Resource Efficiency**

<b>Subcategory</b>	<b>Summary of submissions received</b>
Resource Efficiency Targets	A submission promoted the introduction of resource efficiency targets and bringing Ireland's circular material use rate above the EU average by the end of this decade
Commercial Sector	A number of submissions made recommendations on how waste management in commercial premises could be improved on what has already been achieved. Recommendations included to have mandatory Pay by Weight 3-bin system, mandatory separation of waste materials for different premises, e.g. office paper in offices. There should also be a provision for penalties for commercial premises with high contamination in their bins.

### **Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, Strategic Objective C of the current Plan will remain relevant for the NWPCE:

*The Region will encourage the transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources.*

- The policies under Objective C will be strengthened in the new Plan, in line with the policies outlined in the EU's second Circular Economy Action Plan (2020) and the Waste Action Plan for a Circular Economy (2020).
- The objective will be further strengthened through the introduction of additional legislative targets for the preparing for re-use and the recycling of waste materials introduced under the European Union (Waste Directive) Regulations 2011-2020.

- Engagement with industry and business support agencies will continue in order to drive resource efficiency and the promotion of reuse and repair, as well as the use of secondary materials.
- Repair and Reuse will be supported through implementation of the recommendations of the 2020 CAS review report.
- A new Commercial Waste Awareness Campaign has been developed in which a suite of materials are available to businesses to promote better waste management practices.
- Changes to commercial waste legislation are not within the remit of the NWMPCE.

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### 2.4.3 Climate

Table 2.5 Climate

Subcategory	Summary of submissions received
Climate in general	<ul style="list-style-type: none"> <li>• A number of submissions outline the contribution that different activities of the waste hierarchy contribute to reducing greenhouse gas emissions, from prevention/reuse through to energy recovery processes.</li> <li>• Resilience and climate proofing of plan actions is essential and to ensure the plan is aligned to national climate ambitions and targets.</li> </ul>

#### **Response and Recommendations of RWMPO:**

The NWMPCE will recognise the importance of climate as a significant issue and will include a climate objective under the theme of Consumption. Targets may be considered as impact in terms of carbon equivalents rather than weight based target in some cases.

## 2.5 COMPLIANCE with relevant waste management laws and policies

### 2.5.1 Policy/Legislation

Table 2.6 Policy / Legislation Subcategories 1-3

Subcategory	Summary of submissions received
1. General	<ul style="list-style-type: none"> <li>Some submissions proposed the setting of specific targets to encourage movement up the waste hierarchy, for example targets on reuse and also targets for reducing household residual waste per person.</li> </ul>
2. All island approach for the island of Ireland	<ul style="list-style-type: none"> <li>Several submissions outlined the benefits to be gained in taking an all-island approach to waste management in the island of Ireland, such as economies of scale, thus reducing the need for export of waste materials with potential value.</li> <li>Regulatory norms will also be important regarding all-island approach.</li> </ul>
3. Food Waste / Brown bins roll-out to all households	<ul style="list-style-type: none"> <li>Initial brown bin pilot studies are recommended to determine whether there would be any unwanted repercussions, such as increased costs due to truck retrofitting, increased charges for the householder which could thus deter use of the service.</li> <li>Greater analysis of existing situation is needed where there is not full uptake of brown bins in areas where they are provided.</li> </ul>

#### **Response and Recommendations of RWMPO:**

In line with requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, the current plan Objective A remains relevant for the NWPCE but an update is recommended to include a clear reference to the circular economy.

Objective A states that *'The Region will implement EU and national waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.'*

#### **Food Waste / Brown Bins:**

The Waste Action Plan for a Circular Economy 2020-2025 recommends adoption of the food waste hierarchy as a priority order in food waste prevention and management. It is recommended that NWPCE must also take account of the food waste hierarchy in designing and implementing policy measures.

The RWMPO have already collaborated with other agencies in a pilot run study, and will continue to be involved in further pilot roll-outs to reduce food waste generation and increase segregation when produced.

**Table 2.7 Policy / Legislation Subcategories 4-7**

Subcategory	Summary of submissions received
4. Multi Unit Dwellings (MUDs)	A number of submissions expressed the clear need for improved waste segregation for MUDs – better communal areas and also better incentives e.g. pay by weight, for the management company to and in turn the apartment dwellers to segregate waste.
5. End of Waste	A number of submissions expressed the view that timelines for reviewing and granting End of Waste status need to be tighter. Suggestions included that the EPA give more resources to considering EoW applications.
6. Extended Producer Responsibility (EPR)	<ul style="list-style-type: none"> <li>• The role of EPR could be enhanced, such as clean up, EPR subsidies to waste companies, and wider responsibility especially regarding plastics.</li> <li>• Measures should include clear labelling, and a minimum recycled content.</li> </ul>
7. Incontinence Wear	One submission encourages the Government to go ahead with the scheme previously proposed in 2015, whereby waste costs would be subsidised for those that have heavy residual waste bins because of incontinence wear.

**Response and Recommendations of RWMPO:**

**Multi - Unit Dwellings ( apartments)**

Current Plan *Policy Action F.1.2 Allocate resources to the systematic monitoring of apartment complexes to improve compliance with the segregation of waste prioritising the reduction of contamination. This policy action remains relevant for the revised or replacement Plan.*

**End of Waste**

Reviewing and granting End of Waste applications comes within the role of the Environmental Protection Agency and it is not within the remit of the upcoming NWPCE. However, the RWMPO continue to work on potential national EoW applications and engage with EPA in relation to these projects.

**Extended Producer Responsibility (EPR)**

The Waste Action Plan for a Circular Economy 2020-2025 commits to establishing a new EPR scheme for single use plastics (SUP), extend the current tyre scheme and consider additional waste streams: textiles, bulky waste including mattresses, paints, medicines and

farm hazardous waste. It is also noted that the new Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020 set out further rules and details for extended producer responsibility schemes. It is recommended that the new NWPCE commits to a revision of the current approaches to the EPR approval process, governance, transparency and financial rules to improve circularity.

**Incontinence Wear**

Regulations regarding the collection and waiver schemes around incontinence wear are not within the remit of the NWPCE but we will bring the concerns to the appropriate legislator.

**Table 2.8 Policy / Legislation Subcategories 8-10**

Subcategory	Summary of submissions received
8. European Own Resources Tax	One submission expressed concern regarding the European Own Resources Tax relating to non-recycled plastic packaging. Based on EPA new measurement criteria applied in 2018, the OWT for 2020 is estimated at €176m to the Irish Taxpayer. There is a need for full transparency regarding measurement criteria and how outcomes are determined.
9. The EU Landfill Directive and National Landfill Levy Exemption Framework	One submission recommended the following: <ul style="list-style-type: none"> <li>• A comprehensive review of the existing landfill levy exemption framework</li> <li>• In tandem with this review, a regulatory impact assessment on the suitability or otherwise of the proposed waste recovery levies should be undertaken.</li> </ul>
10. EcoModulation Fees	There were two submissions regarding EcoModulation Fee scheme run by Repak. The positives about this scheme were noted, but also that it could be implemented in a better way to promote recyclability / recycled content.

**Response and Recommendations of RWMPO:**

RWMPO will continue to engage on a national basis with policy makers, legislators and agencies as part of ongoing stakeholder engagement including seeking clarification regarding initiatives and issues such as those listed above.

## 2.5.2 Enforcement & Regulation

Table 2.9 Enforcement & Regulation

Subcategory	Summary of submissions received
Regulations for SID / licensing / permitting for waste infrastructure	<ul style="list-style-type: none"> <li>• A number of submissions referred to Strategic Infrastructure Development – how legislation around SID should be reviewed to address restrictive thresholds and timelines, in order to bring about a more expedient system for critically important waste infrastructure projects.</li> <li>• A number of submissions referred to the need for shorter timeframe in making decisions on waste licence applications or reviews.</li> <li>• The need was also expressed for reform of legislation and procedures for planning and licensing / permitting of waste treatment facilities, especially in relation to the long timelines involved in making decisions on applications.</li> </ul>
Enforcement	<ul style="list-style-type: none"> <li>• Recommendation to establish an Environmental Crime Unit to address serious crime in burning and illegal dumping.</li> <li>• Multiagency enforcement campaigns are needed.</li> <li>• For transparency, facilities annual reports should be available online.</li> <li>• Waste legislation needs to be effective and enforceable, and penalties an adequate deterrent.</li> <li>• Good regulation and enforcement assists the circular economy.</li> </ul>

### **Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, the wording in the current plan of Objective F remains relevant. This wording states that:

*The Region will implement a consistent and coordinated system for the regulation and enforcement of waste activities in cooperation with other environmental regulators and enforcement bodies.*

- The Waste Action Plan for a Circular Economy 2020-2025 has noted that the role, capacity and responsibilities of the WERLA will be enhanced to position the Local Authority sector better to respond to emerging and priority enforcement challenges.

- An expansion of activities for the WERLAs, as outlined in the Waste Action Plan for a Circular Economy 2020-2025 is being funded by DECC;
- The new recycling targets for municipal waste as well as the planned introduction of the recovery levy of €5 per tonne may encourage more unauthorised waste activity requiring greater enforcement.

The new NWMPCE will include measures to tackle the volume of construction waste generated within the State and the historical and current challenges faced in managing this stream.

## 2.5.3 Environmental Protection

Table 2.10 Environmental Protection

Subcategory	Summary of submissions received
Strategic Environmental Assessment	<ul style="list-style-type: none"> <li>• The EPA advises that the authors of the plan should fully consider, as appropriate, the requirements of the Strategic Environmental Assessment Regulations (S.I. 435 of 2004, as amended) and the Habitats Directive, early in the plan-preparation process.</li> <li>• The EPA refers the authors to the EPA Synthesis Report on Developing A Strategic Environmental Assessment (SEA) Methodologies For Plans And Programmes In Ireland (and the pre-screening check contained within) to assist in considering whether SEA is required for the Plan.</li> </ul>
Protection of archaeological sites and monuments	<ul style="list-style-type: none"> <li>• For waste management facilities, it is important that developments take into account both direct and indirect impacts on archaeological sites and monuments.</li> <li>• Consultation of records for archaeological sites and monuments will help developers to minimise adverse impacts on the historic environment. (National Monuments Service)</li> </ul>

### **Response and Recommendations of RWMPO:**

As well as developing a NWMPCE, the regions will also prepare in tandem with policy developments a full Strategic Environmental Assessment as well as an Appropriate Assessment and the findings will be considered in aspects of policy development.

Strategic Objective G of the current Plan will continue to be relevant in the new Plan:

*Apply the relevant environmental and planning legislation to waste activities in order to protect the environment, in particular European sites, and human health against adverse impacts of waste generated.*

The principles of protection to human health and the environment from waste operations are central to EU and national policy on the protection of the environment. As such, the intent of Strategic Objective G remains a requirement for the revised or replacement

Plan to ensure waste management in the State is sustainable and offers the highest levels of protection.

The NWMPCE will include the new guidance document 'Waste Management Infrastructure - Guidance for Siting Waste Management Facilities', the scope of which includes broad siting criteria and facility specific guidance for consideration when siting a waste facility.

Proximity of proposed facilities to archaeological sites is dealt with at planning stage.

## 2.6 CAPTURE of waste materials for treatment

### 2.6.1 Infrastructure

Table 2.11 Infrastructure: Subcategories 1 and 2

Subcategory	Summary of submissions received
1. Need for Strategic Waste Management Infrastructure	A number of submissions referred to the growing need for strategic waste management infrastructure. Factors such as growing population and economy need to be considered. Regional specific factors need to be considered as well as the national approach. Supports are necessary for developing infrastructure to develop self-sufficiency in handling waste. Preparation for reuse infrastructure should be included.
2. Waste Capacity in general	<ul style="list-style-type: none"> <li>• A number of submissions referred to the need for additional waste capacity to be available in case of an unforeseen event, such as increase in waste due to disease outbreak or if export market was restricted. It is proposed that some operating plants be allowed extra contingency storage capacity.</li> <li>• More recycling industries and markets in Ireland would help contribute to alleviate waste capacity challenges.</li> <li>• The need for export of waste is unlikely to change in the foreseeable future, hence the need to keep export of the materials open as a viable option.</li> <li>• There are some developments within Ireland which will help to reduce this need for export of waste, for example a focus on the establishment of a paper recycling solution.</li> </ul>

#### **Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" the current plan's Strategic Objective E remains relevant. This wording states that:

*The Region will promote sustainable waste management treatment in keeping with the waste hierarchy and the move towards a circular economy and greater self-sufficiency*

- The Evaluation states that whilst there have been significant developments in sustainable waste management treatment infrastructure since the publication of the RWMP in May 2015, there remains scope for future developments under this objective. These developments need to be informed by analysis of existing and predicted generation rates and treatment capacities to

reduce the need for export and increase the role of higher waste activities such re-use, repair and recycle.

- The Regions, following the Civic Amenity Site (CAS) report that they have prepared, intend to push reuse and recycling at CAS.
- The difficulty of management of wastes during emergencies (such as the 2016 capacity issue for municipal waste) was further highlighted by the COVID-19 response to significantly altered public waste management patterns. A response is needed as public health, environmental protection, and national targets remain in force during emergency situations. The coordination of a national response plan and crisis communication strategy for waste management in emergency situations is to be included in the future Plan.

**Table 2.12 Infrastructure: Subcategories 3, 4 and 5**

Subcategory	Summary of submissions received
3. Waste collection	<ul style="list-style-type: none"> <li>• One submission had the view that privatising waste collection was a mistake and that the waste collection system is bureaucratic, and it's important to have a localised approach.</li> <li>• Alternative option of private operators tendering for complete routes.</li> </ul>
4. Colour Coding of Bins	<p>One submission made the following points on behalf of its waste industry members:</p> <ul style="list-style-type: none"> <li>• There is strong concern about the costs involved for waste collectors changing to the new standard bin colours. The cost of the change should be paid for by the State – anticipated total cost of €75m.</li> <li>• Money would be better spent on awareness, education and enforcement.</li> <li>• Customers currently know which bin is which. We just need to agree on consistent terminology to facilitate awareness and labelling of packaging.</li> </ul>
5. Waste Codes	<p>One submission noted inconsistencies among authorities - EPA, NTFSO, LAs - regarding certain waste codes. The acceptance of wastes at reprocessing on final treatment often depends on the waste code, so it is critically important to have consistency.</p>

**Response and Recommendations of RWMPO:**

- The new National Waste Management Plan for a Circular Economy will be directed by the adoption of actions outlined at national level in the Waste Action Plan for the Circular Economy with regard to the approach to private waste collection including the setting of recycling targets for collectors, adopting standard colours for bins and waste segregation incentives
- Regarding waste codes, the work of National Working Groups will continue to further the understanding and use of individual waste codes, in accordance with the Environmental Protection Agency's publication '*Waste Classification, List of Waste & Determining if Waste is Hazardous or Non-hazardous*'. The RWMPO and WERLAs are working on standardisation of codes for facility types to ensure a level of consistency in return.

**Table 2.13 Infrastructure: Subcategories 6 and 7**

Subcategory	Summary of submissions received
6. Recycling Infrastructure	<p>A number of submissions referred to the need to develop recycling, especially in view of more stringent EU targets in the near future.</p> <ul style="list-style-type: none"> <li>• The concept of the Proximity Principle was emphasised.</li> <li>• Significant improvement in national recycling rates could be achieved through improved segregation.</li> <li>• Waste collection companies should take a greater role in driving improvements in waste management behaviours. However, a view was also expressed that the waste collector cannot be held responsible for people’s behaviour.</li> <li>• It needs to be assessed whether waste going to energy recovery, while beneficial over landfill, might prove a disincentive for recycling.</li> <li>• A more incentivised charging structure should be considered for householders and commercial sectors, e.g. pay by weight.</li> <li>• Reliance on international markets e.g. Asia is clearly problematic.</li> <li>• Fiscal measures could be used to encourage flow of waste up the hierarchy rather than control through planning restrictions, as such restrictions inhibit competition.</li> <li>• More researching of MSW recycling rates in the best performing countries – once like is compared with like.</li> </ul>
7. Composting	<p>A number of submissions noted the following points regarding composting:</p> <ul style="list-style-type: none"> <li>• Home composting will contribute to achieving 2025 recycling targets and could be up to 5% MSW but more analysis is required.</li> <li>• The merits of home composting should be considered particularly for rural areas where collection rates are low.</li> <li>• Food outlets that serve compostable packaging should have separate compost bins.</li> <li>• Have compost bins on streets as well as more recycling bins.</li> </ul>

**Response and Recommendations of RWMPO:**

- While there have been significant recent developments in sustainable waste management treatment infrastructure, there remains scope for further future developments. The completion of all outstanding authorisations for residual Municipal Solid Waste (rMSW) requires immediate attention. A review of the systems around approvals and authorisations for sustainable waste infrastructure is now required to underpin the economy as it reopens and grows. These developments need to be informed by analysis of existing and predicted generation rates and treatment capacities to reduce the need for export and increase the role of higher waste activities such re-use, repair and recycle.
- The volumes and quality of the waste streams generated are key considerations for the development of infrastructure. Current barriers include insufficient throughput to facilitate a viable treatment investment within the State. However, some indigenous reprocessing and recycling development has been successful (e.g. waste oil) and this policy remains relevant.
- Regarding biowaste, it is recommended that a more detailed assessment of current and projected treatment capacity is undertaken to inform the NWMPC. It is also noted that by the 31st of December 2023, bio-waste must be either separated and recycled at source or collected separately and not mixed with other types of waste.

**Table 2.14 Infrastructure: Subcategories 8 and 9**

Subcategory	Summary of submissions received
8. Energy Recovery/ Thermal Treatment	<ul style="list-style-type: none"> <li>• There was a number of submissions outlining the positive role of energy recovery, as a preference to landfill disposal, and also contributing to reduction targets for Greenhouse Gas Emissions.</li> <li>• Better balance of energy infrastructure is needed for the three regions.</li> <li>• One submission questioned how can the cement industry charge the waste industry for SRF. SRF displaces fossil fuels.</li> </ul>
9. Landfill	<ul style="list-style-type: none"> <li>• Regarding landfills - whether landfill waste or recovery materials intake should be analysed.</li> <li>• Remediation of historic landfills needs to be prioritised.</li> </ul>

**Response and Recommendations of RWMPO:**

**Energy Recovery/ Thermal Treatment**

Based on 2020 thermal treatment development, either consented or within the planning/licensing regime, there is an estimated potential total 1,770,000 tonnes per annum of thermal treatment capacity. This would suggest that the required capacity under Policy E15a of the current plan has been achieved by the developments in planning/licensing (subject to grant).

However, the changing profile of waste recovery versus disposal and the ongoing reliance on exports may require further thermal treatment. The RWMPO are monitoring the residual waste capacity on a quarterly basis - these capacity reports indicate that treatment options for residual waste within the country are very tight and we are still reliant on export options to meet our needs.

It is recommended that a detailed review of this residual waste capacity be conducted to inform the retention, modification or omission of this policy in the revised or replacement Plan. This review needs to consider the use of cement kilns as capacity option in Ireland as they are only available when there is a demand for cement product. This was an issue during the COVID-19 pandemic.

**Landfill**

Priority will be continue to be given to the remediation of historic landfills. A co-ordinated system has been established, whereby Historic Landfill Regional Co-ordinators are now liaising with authorities and DECC as well as linking on an interregional basis, with a view to achieving landfill remediation targets. The investigations and remediation are currently funded by DECC.

**Table 2.15 Infrastructure: Subcategories 10 and 11**

Subcategory	Summary of submissions received
10. Bring Banks	<p>A number of submissions referred to the need for greater number of bring banks:</p> <ul style="list-style-type: none"> <li>• The density of bring banks per population needs to be greater for achieving higher recycling – specially for glass and textiles</li> <li>• There should be one per 1000 people. This deficit should be addressed and also ensure that they are convenient and accessible for the public.</li> <li>• There is a need for more textile bring banks, and greater take-back at stores.</li> </ul>
11. Civic Amenity Sites	<p>A number of submissions covered recommendations in relation to Civic Amenity Sites:</p> <ul style="list-style-type: none"> <li>• More CAS would be welcome, especially around larger population centres.</li> <li>• The new plan should encourage co-location of CAS with transfer stations.</li> <li>• Residual waste accepted at CAS should not be a cheap alternative to kerbside</li> <li>• Anyone bringing residual waste to CAS should be registered as a customer and should justify why they do not have kerbside.</li> <li>• All residual waste at CAS should be weighed- data can then be analysed same as for kerbside for individual customers.</li> <li>• While CAS may receive funding, customer should be charged the full amount for residual waste.</li> <li>• There should be adequate reception facilities to preserve the reuse potential of items. This should be included in tender contracts for CAS.</li> <li>• Operators should be encouraged to partner with or provide priority access to donated materials for social enterprises.</li> <li>• Reuse data from CAS should be made available</li> </ul>

**Response and Recommendations of RWMPO:**

**Existing Plan policies under Strategic Objective E of the current plan include:**

*E3a The local authorities in the region will maintain and develop their existing networks of bring infrastructure (e.g. civic amenity facilities, bring banks) to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes.*

*E3b The Plan supports the development by the private sector of public bring infrastructure (e.g. civic amenity facilities, bring banks) subject to appropriate statutory approvals and in line with appropriate environmental protection criteria.*

- These general policies on CAS and bring centres will continue to apply in the new Plan.
- The Regions' 2020 CAS report contains a series of recommendations on integration and consolidation of the CAS network and the implementation of its recommendations will be a requirement of the revised or replacement Plan. CAS operators will be obligated to engage with Producer Responsibility Initiatives to evaluate options for facilitating reuse and repair. This will include engaging with social enterprises and similar organisations.
- Regarding textiles, a new system for improved reporting on the nature and extent of used textiles is required to support tackling this waste stream.

**Table 2.16 Infrastructure: Subcategory 12**

Subcategory	Summary of submissions received
12. Data	<p>A number of submissions outlined the need for extensive and reliable data.</p> <ul style="list-style-type: none"> <li>• Recent data reports by the RWMPO have been very beneficial –it is important for this to continue, e.g. C&amp;D waste data, reporting on CAS, quarterly reports on MSW.</li> <li>• The EPA, supported by the National Waste Collection Permit Office has established a National Waste Data Network and look forward to working closely with the Regional Waste Management Planning Offices and other key stakeholders.</li> <li>• There is a need for robust indicators to monitor and assess the implementation and effectiveness of the Plan over its lifetime, including annual implementation reports.</li> <li>• In looking at waste projections for the forthcoming plan, consideration should be given to the number of households that do not currently avail of a kerbside collection. There is a need to establish better quality information on the scale of this unaccounted for waste, and how it is being managed</li> <li>• Significant costs are incurred by Local Authorities and the State to deal with waste management covering a range of issues such as litter and waste enforcement. There is limited data on these actual costs, in particular the costs associated with the management of unauthorised waste deposits and enforcement of same.</li> <li>• A better understanding of the recycling rate for all materials (similar to packaging data) would help the waste industry to identify and target areas that could be improved.</li> <li>• The availability of accurate and timely data on waste data and data flows is a prerequisite to achieving policy alignment at national and regional level and in planning strategic waste infrastructure and identifying potential capacity gaps.</li> <li>• Waste characterisation studies are extremely important.</li> </ul>

**Response and Recommendations of RWMPO:**

- In terms of data management and flow, the recommendations for a more comprehensive, shared and timely reporting system are included in the Waste Action Plan for a Circular Economy 2020-2025. Once a successful dynamic and transparent reporting system is implemented, it will aid in the tracking of performance to targets, identifying capacity issues and helping to improve behaviour change.
- Key performance indicators relating to policy actions and targets have been used in the periodic reporting to facilitate improved waste management. This data management reporting is central to monitoring improvement of management performance. While periodic reporting provides a valuable monitoring regime to track progress, the non-availability of up to date waste data has been cited as a barrier to measuring performance and a more dynamic data reporting regime is required as recommended in the Waste Action Plan for a Circular Economy 2020-2025.
- The frequency of reporting should also be considered to maximise the balance between performance management and data availability for reporting.

- The EPA have setup a National Waste Data Network with the primary objectives:-
  - Facilitate engagement and cooperation between the public bodies in relation to waste data management;
  - Drive improvements in the quality and timeliness of national waste data and increase confidence in the accuracy of outputs;
- Maximise the lawful sharing of waste data with a view to improving Ireland's capacity for tracking waste flows through the waste management network and supporting related enforcement and regulatory functions

**Table 2.17 Infrastructure: Subcategories 13 and 14**

Subcategory	Summary of submissions received
13. Pay to Use units (PTUs)	<p>A number of submissions included differing views on the use of PTUs</p> <ul style="list-style-type: none"> <li>• The view of a PTU operator is that PTUs play an important role in waste management infrastructure – catering for many large households with extra waste or small households with little waste, also short term lets, holiday homes, and that PTUs are not in competition with private kerbside collectors, but a necessary support.</li> <li>• Two waste collection companies generally expressed the following views:               <ul style="list-style-type: none"> <li>• Pay to Use compactors are not compatible with achieving even minimal recycling rates, nor the future higher targets.</li> <li>• If an outright ban is not an option, then the same recycling target rates should be applied to PTUs.</li> <li>• PTU facilities should only be permitted where there is an absence of kerbside collection and civic amenity sites.</li> </ul> </li> </ul>
14. Deposit & Return Scheme DRS	<p>Two submissions referred to DRS:</p> <ul style="list-style-type: none"> <li>• Request that the commercial foundations essential to the operation of green bin (recyclables) collection are not undermined by the rollout of DRS.</li> <li>• Promotion of Digital Deposit and Return Scheme as the best environmental option and one that is most convenient for consumers.</li> </ul>

**Response and Recommendations of RWMPO:**

**PTUs**

Policy Action E23 of the current Plan states: *In the absence of kerbside source segregated collection services and where the proximity of civic amenity facilities and bring centres is prohibitive the plan supports localised collection solutions such as community drop off points or pay to use systems subject to compliance with the household waste collection regulations*

This policy action remains relevant for the NWMPCE.

**Deposit & Return Scheme**

The consultation paper on Ireland's Deposit Return Scheme (DRS) sets out how PET plastic bottles and aluminium drinks cans will be introduced to allow for greater recycling of these streams through retailer take back schemes which will also aid in kerbside segregation.

## 2.6.2 Other Specific Waste Streams

Table 2.18 Other Specific Waste Streams

Subcategory	Summary of submissions received
Hazardous waste	<ul style="list-style-type: none"> <li>The amount of hazardous waste produced in Ireland continues to increase, but Ireland still does not have the range of facilities to deal with all of the hazardous waste generated. Overall 65 per cent of Ireland’s hazardous waste was exported in 2019.</li> <li>The new plan should have regard to the recommendations and data within the new National Hazardous Waste Management Plan (NHWMP).</li> <li>LAs should publish in January each year a schedule of collection days for large household items, paints/chemicals /haz waste, WEEE. Needs of those in poverty and without transport should be taken into account.</li> </ul>
Biosolids	<p>The points made in two submissions are as follows:</p> <ul style="list-style-type: none"> <li>The new WMPCE provides an ideal opportunity to assess the value that may be extracted from wastes that contain carbon, such as biosolids.</li> <li>Consider the need for investment in alternative sludge treatment infrastructure given likelihood of more stringent EU policy.</li> <li>There is limited Anaerobic Digestion (AD) capacity to treat animal slurries, which is a lost opportunity.</li> <li>Ireland’s current biological treatment capacity is heavily utilised to stabilise organic fines rather than producing high quality compost.</li> <li>We are currently exporting a lot of food waste to Northern Ireland for treatment.</li> <li>Consider incentivising indigenous biological treatment options to produce higher value outputs and/or renewable energy, possibly including financial incentives to encourage more AD of biowaste and agricultural waste.</li> </ul>
Construction & Demolition Waste	<p>A number of submissions referred to the need to have better waste management on construction sites, such as the following:</p> <ul style="list-style-type: none"> <li>More specific detail in Construction Waste Management Plans</li> <li>Closer scrutiny of waste management performance</li> <li>The development of standards / End of Waste status for waste materials arising from construction &amp; demolitions</li> <li>Pay by Weight charging for C&amp;D waste</li> <li>Applying minimum recycled content levels, and/or levies to virgin materials where alternative secondary material is available.</li> </ul>

### **Response and Recommendations of RWMPO:**

- The RWMPO will be cognisant of the policies in the revised National Hazardous Waste Plan and the requirements to develop hazardous waste collection systems for households.
- Regarding management of waste sludge, RWMPO will engage in discussions with Irish Water to determine how further progress can be achieved in the treatment of waste sludge.
- The RWMPO will continue to promote new developments in the treatment of biowastes.
- Specific measures to drive more effective prevention and management of construction waste, will include enhancement and promotion of Circular Economy guidance and training resources for the construction supply chain.

## 2.6.3 Innovation

Table 2.19 Innovation

Subcategory	Summary of submissions received
Innovation in general	<ul style="list-style-type: none"> <li>• There should be support from Government to help Irish businesses that are innovating in the area of lightweighting and developing recyclable packaging materials.</li> <li>• Reward EcoDesign – we must ensure we do not punish those who are making efforts to eco-design their products. With reference to Repak EMF scheme – Repak would continue to levy high EMF on monomaterial flexible plastics. This means no incentive to switch to monomaterial packaging and a more circular waste stream.</li> <li>• The Plan should encourage and support new technologies as the waste sector is constantly evolving. IWMA support a digital Deposit and Return Scheme as the best environmental option and one that is most convenient for consumers. We can and should be leaders in waste management as Ireland is a very progressive country in many areas including digital technology.</li> <li>• Promotion of pyrolysis – this would be better than incineration or landfill. No toxins emitted and Recovered Carbon Black would be of value.</li> <li>• For handling less attractive products such as soft plastic and coloured rigid plastics, it is suggested that there be supports for the following:               <ul style="list-style-type: none"> <li>• Chemical depolymerisation yielding monoethylene glycol</li> <li>• Pyrolysis can deal with troublesome polymers e.g. PS</li> <li>• Gasification yielding ethanol</li> <li>• Hydrothermal treatment yielding synthetic crude oil.</li> </ul> </li> </ul>

### **Response and Recommendations of RWMPO:**

- Under the current Plan Policy D4, the RWMPO have sought to participate in funding for research and innovation and have had some success in this matter as listed in the Plan Evaluation. On an ongoing basis, the RWMPO are establishing links with research institutions to further strengthen the RWMPO offering for future research calls. This policy action remains relevant for consideration in the revised or replacement Plan.

- The Plan Evaluation has identified the importance of innovation in its own right in the capturing of resources and therefore the new Plan will include a Strategic Objective on Innovation - under the theme of Capture.

# 3.0 ONLINE SUBMISSIONS

## Summary of Online submissions received via MyWaste.ie

Members of the public were invited either to make a written submission to SRWMO or alternatively to make their submission online via MyWaste.ie.

In addition to completion of an online questionnaire, results of which are presented graphically, the public were also invited to add specific comments. Most comments were brief

rather than being very detailed. General areas addressed by a large number of respondents included the need for reduction in packaging, in particular single use packaging, especially plastics. Many comments also covered issues relating to household waste collection and management and how its operation could be improved.

## 3.1 Results of the Questionnaire

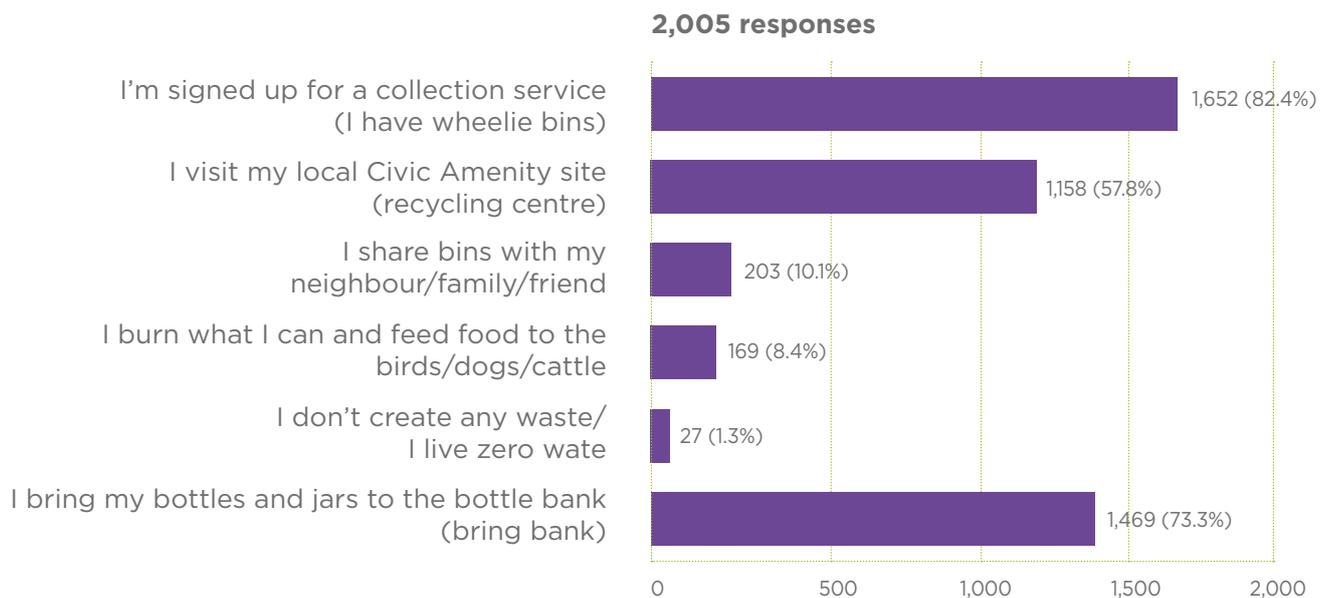


Figure 3.1 How do you manage your household waste?

1,586 responses

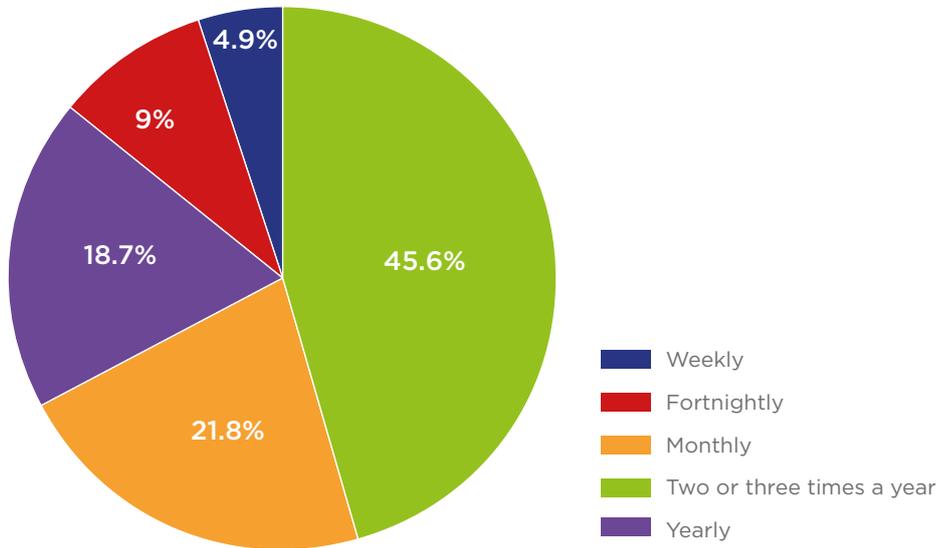


Fig 3.2 If you visit your local civic amenity site (recycling site) how often?

1,988 responses

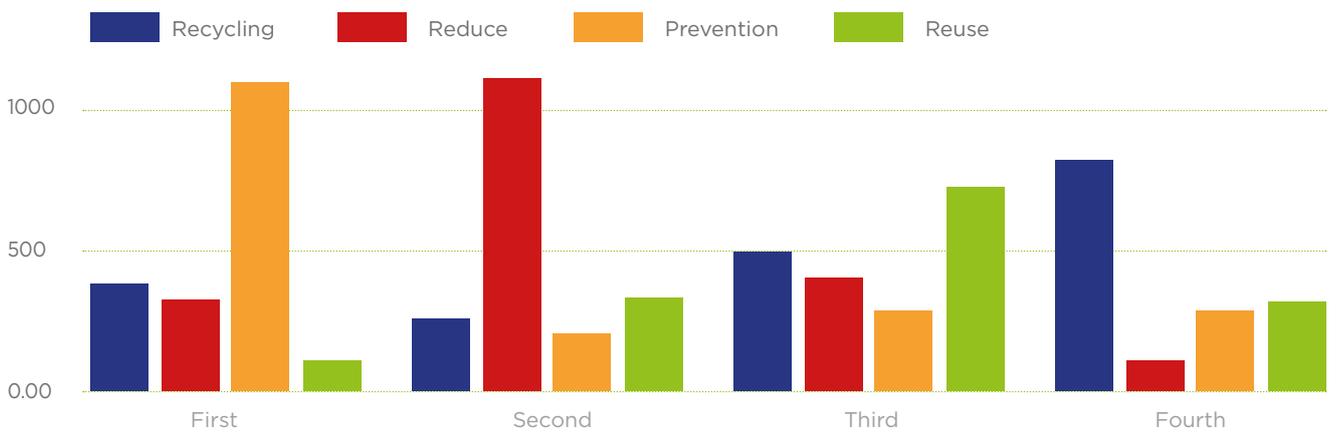


Fig 3.3 Rank the following 4 issues in order of importance to you

1,983 responses

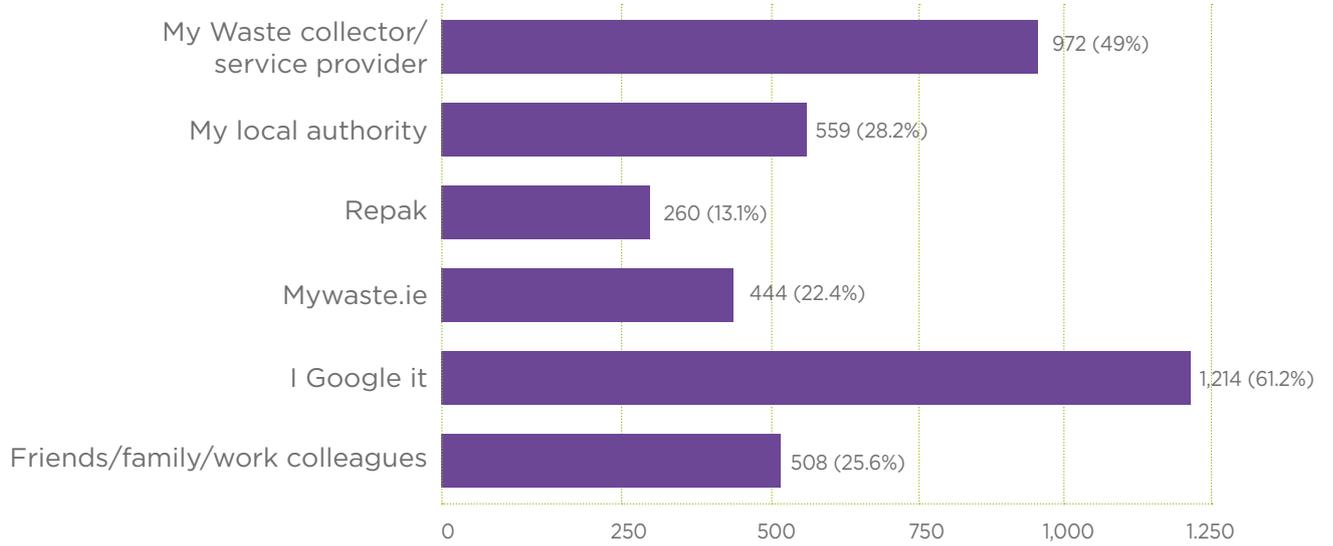


Fig 3.4 Where do you get information about what to do with your waste?

2,000 responses

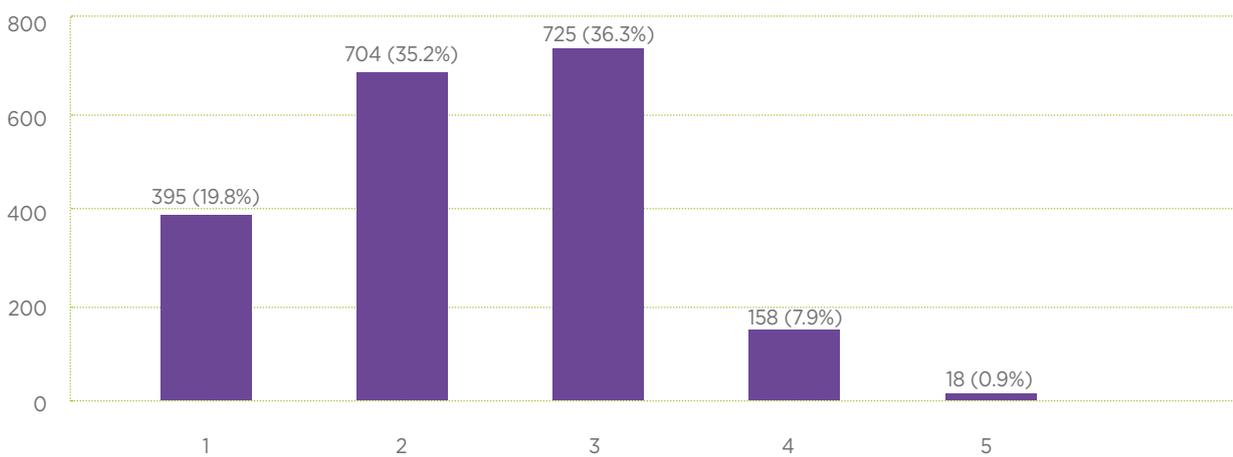


Fig 3.5 How would you rate waste management in Ireland?

1,948 responses

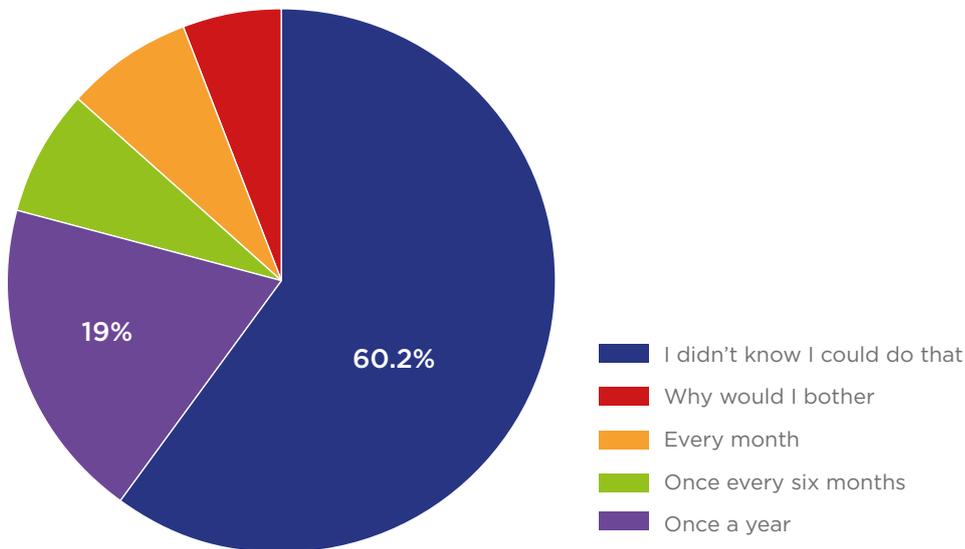


Fig 3.6 How often do you get information on managing waste or your recycling performance from your waste collector?

### 3.2 The Issues Raised in Online Submissions

Of the 1055 individual comments submitted, the following gives an overview of the main issues raised. Like the summary of the written submissions, the online submissions have been categorised under the themes of Circularity, Consumption, Compliance and Capture. Given

that the parallel approach with these themes is in the same format as the summary of written submissions in Section 2 of this report, the RWMPO responses and recommendations as outlined in Section 2 will also apply to the online submissions.

### 3.3 CIRCULARITY

Table 3.1 Circularity

Subcategory	Summary of online submissions
General	<p>Many of the improvements proposed were all within the theme of circularity, without the respondent necessarily thinking or knowing that their proposed approach related to circularity and the circular economy. The following excerpts give some examples of specific comments:</p> <p><i>'As an island nation, we are uniquely positioned to drive a circular economy to reduce how much goods we import, and how much waste we need to export.'</i></p> <p><i>'There should be more support for circular economy projects at a local level e.g. Local community initiatives in rural areas...'</i></p>

## 3.4 CONSUMPTION

### 3.4.1 Prevention

Table 3.2 Prevention

Subcategory	Summary of online submissions
Education and Awareness	One of the general threads through the submissions was that more promotion on different media is needed to show people what can and cannot be recycled, as well as the better choices that consumers can make.
Packaging	<p>Views and suggestions included the following</p> <ul style="list-style-type: none"> <li>• Producers and retailers should be held more responsible for the quantities and nonrecyclability of packaging, especially plastic.</li> <li>• Compostable or biodegradable packaging was the better option for packaging that cannot be avoided.</li> <li>• Very few outlets provide refill, packaging free options.</li> <li>• There were queries regarding the lack of recycling of soft plastics.</li> <li>• Many submissions favoured a Deposit Return Scheme for plastic bottles and drinks cans and glass.</li> </ul> <p><i>'...Supermarkets/producers wrap food items in so much packaging which we need to dispose of. We are also forced to buy predetermined quantities which a lot of the time leads to excess waste.'</i></p>
Reuse	Prevention and reuse are seen by respondents as the best options, with several suggestions for reuse, such as reusable nappies, school book and uniform exchange schemes, and also to have more general opportunity to rent / borrow items that are only needed occasionally.

### 3.4.2 Resource Efficiency

Table 3.3 Resource Efficiency

Subcategory	Summary of online submissions
General	<p>Many submissions emphasised the role that the producer and retailer have to play in avoidance of excess packaging (a resource in itself) as well as general resource efficiency in production.</p> <p>The following are examples of comments relevant to resource efficiency:</p> <p><i>'...Individuals trying to go zero or low waste is just a small part of the real solution – encouraging manufacturers and retailers to use less resources in the production and marketing of food and other household goods.'</i></p> <p><i>'I think a key thing is to discourage manufacturers from using plastics and packaging that are not reusable or recyclable, and to encourage them to use less packaging in the first place.'</i></p>

### 3.4.3 Climate

Table 3.4 Climate

Subcategory	Summary of online submissions
General	<p>Many of the suggestions that were made for reducing waste would also help to address the challenge of climate change. The following are examples of comments relating specifically to climate:</p> <p><i>'There are lots of positives with reuse options but I believe we can do much more. Education and collaboration are key to reducing Ireland's CO2 emissions.'</i></p> <p><i>'I think at minimum the local authorities have an opportunity to set an example and take a stronger stance on climate targets.'</i></p>

## 3.5 COMPLIANCE

### 3.5.1 Policy / Legislation

Table 3.5 Policy / Legislation

Subcategory	Summary of online submissions
General	<p>Suggestions regarding policy development included the following:</p> <ul style="list-style-type: none"> <li>• Producer responsibility should be extended to certain other streams, such as mattresses, bulky goods etc.</li> <li>• The system for collection of household waste should be taken back by local authorities, or tendered out per area – this would avoid current situations where there could be a number of bin trucks serving the one small housing estate or roadway.</li> <li>• There should be a central tax system that would cover the cost of waste collection, rather than individual householders having the choice themselves on whether to sign up to a service.</li> <li>• A deposit and return scheme should be introduced covering plastic bottles, cans and glass bottles.</li> </ul> <p><i>'There is a direct correlation between the prevalence of illegal dumping and the level of waste charges. We should be paying for waste ( and water) centrally through LPT / Taxes to bring it back into contract. Currently illegal waste is a blight and the cost of waste is firmly shared between local authority and the compliant majority.'</i></p>

### 3.5.2 Enforcement & Regulation

Table 3.6 Enforcement & Regulation

Subcategory	Summary of online submissions
General	<p>The main thrust of comments relating to waste enforcement was that there should be more of it, in relation to waste regulations and byelaws. It was felt that there should be issuing of more and higher fines, including for illegal dumping and littering.</p> <p><i>'More fines should be issued to people that don't separate their waste accordingly, I am constantly seeing the wrong items in bins.'</i>  <i>'There is far too much littering and flytipping. Local councils do not enforce the bye laws requiring households to dispose of their waste responsibly.'</i></p>

### 3.5.3 Environmental Protection

Table 3.7 Environmental Protection

Subcategory	Summary of online submissions
General	<p>Most submissions covered specific aspects of waste management, such as the importance of information campaigns, and the need for an integrated system of waste management services. These actions would in turn help to protect the environment. Examples of comments referring more specifically to environmental protection are as follows:</p> <p><i>'As well as climate change running a strand through waste management, environmental impact should also be central, e.g. impact on wildlife of not providing sufficient public bins/ street cleaning and consequent littering.'</i>  <i>'Bio-diversity should be promoted in line with reducing and recycling.'</i></p>

## 3.6 CAPTURE

### 3.6.1 Infrastructure

Table 3.8 Infrastructure

Subcategory	Summary of online submissions
1. General	<ul style="list-style-type: none"> <li>• It was felt that if people knew more about the destination of recyclables, then they would be encouraged to separate better for recycling.</li> <li>• Ireland should look to good practices in other countries.</li> <li>• There is a need for public bins to include segregation for recyclables and food waste - retailers should provide them outside their shops.</li> </ul>
2. Household Waste Collection	<ul style="list-style-type: none"> <li>• Glass bottle collection for all households was proposed.</li> <li>• Food Waste/ brown bin collection for all households was proposed, i.e. including rural areas and apartment blocks.</li> <li>• Apartment block management companies should be held more responsible for providing proper waste segregation bins.</li> </ul> <p><i>'... There is currently zero incentive to segregate waste in apartment complexes. We should be able to 'pay by weight' and a polluters pays policy should apply! Please put a requirement for management agencies/ companies to provide a 'pay-by-weight' for residents into the circular plan.'</i></p>
3. Bring banks and civic amenity sites	<ul style="list-style-type: none"> <li>• There were many proposals for increased number of bring banks, especially for glass. It was questioned why plastic and paper bring banks are no longer available. It was also questioned why textile banks aren't available for non-reusable textiles.</li> <li>• Glass bottle banks should be emptied more frequently as they are often overflowing, causing broken glass in the area.</li> <li>• Many feel there should not be charges for recycling at Civic Amenity sites, and that the charges can vary from one CAS to another. It was felt that people should not be charged for their recycling efforts.</li> <li>• CAS opening hours were considered too limited by a number of people, especially for those who work full time, hence the CAS should be open at weekends, as someone is unlikely to take time of work to take waste to the CAS.</li> <li>• Some proposed a reuse facility to be run as part of a CAS.</li> </ul> <p><i>'Recycling centres need to more customer focused. Opening times need to extend. Incentives to recycle more, especially bulky items.'</i></p> <p><i>'...that civic amenities sites exist and are very cost effective does not seem to be general knowledge.'</i></p>
4. Bulky Waste	<p>It was proposed that there should be periodic collections of bulky waste from households, e.g. furniture and mattresses, especially considering that people may not have suitable transport or not have the personal capability of hauling bulky waste, as well as the considerable cost involved to have bulky waste removed.</p>

### 3.6.2 Other Waste Streams

Table 3.9 Other Waste Streams

Subcategory	Summary of online submissions
Specific Waste Streams	<p>Suggestions were as follows:</p> <ul style="list-style-type: none"> <li>• Civic Amenity Sites should accept a wider range of hazardous wastes, e.g. paints and oils , and also there should be a regular collection for them e.g. annual or twice a year.</li> <li>• Construction waste needs better segregation and recycling.</li> <li>• Biowastes e.g. garden woody material need better treatment.</li> <li>• Take back scheme for medicines was proposed.</li> </ul>

### 3.6.3 Innovation

Table 3.10 Innovation

Subcategory	Summary of online submissions
General	<p>The theme of innovation applies to many of the suggestions that were made for increasing the sustainability of packaging at producer and retailer level, as well as the need for improved waste management. Examples of more specific comments are as follows:</p> <p>'I firmly believe that Ireland should invest heavily and aim to become a world leader in waste management. There should be a recycling /research centre in the country that is publicly owned and aimed at research over profit...'</p> <p>'There should also be investment in product design courses aimed at sustainable packaging, or a competition for sustainable packaging aimed at product design students etc.'</p>

#### **Response of RWMPO to online submissions**

The RWMPO acknowledge the input of all who completed the online questionnaire and made specific suggestions in the comments box. The responses to the questionnaire itself provided the RWMPO with an overall general understanding of the participants' perception in relation to the Circular Economy.

Many entries highlighted the same areas of concern, i.e. the need for more education and awareness, sustainability of packaging, reduction of single use packaging and the

need for introduction of Deposit and Return Scheme, as well as improvements needed for better and more streamlined household waste management.

The summary of the online submissions is largely in parallel with the summary for written submissions, i.e. within the themes of Circularity, Consumption, Compliance and Capture, hence the RWMPO responses and recommendations for each of these themes as outlined in Section 2 of this report can be understood to cover both online and written submissions.

# 4.0 OVERALL CONCLUSION TO PRE-DRAFT CONSULTATION

The Regional Waste Management Planning Offices have considered the submissions that were received as part of the pre-draft consultation process, in the preparation of the draft National Waste Management Plan for a Circular Economy. Submissions included those received in detailed written format from a range of stakeholders such as relevant agencies and industry, as well as significant online input from members of the public through MyWaste.ie.

Submission content acknowledged Ireland's successes to-date, and the need for further ongoing progress in working towards circularity through waste prevention and optimisation for material usage, i.e. making more with less. The new way is to see end of life materials and goods, not as waste, but as resources of value that warrants their retention in a continuous reuse, recycling and recovery loop, with minimum need for final disposal.

The consultation outcomes will contribute greatly to the formulation of the new Plan around the central themes of Circularity, Consumption, Compliance and Capture, all of which rely on the support of and collaboration with all the different stakeholders including people in general. The following excerpts are a demonstration of the many constructive suggestions that were received in the pre-draft submissions:

*'Resilience should be a key factor underlying the preparation of the plan. This includes climate proofing of plan actions and recommendations to ensure the plan is aligned to national climate ambitions and targets. It should also consider measures to enhance infrastructural resilience through using learnings from recent events such as Brexit and the Covid pandemic.'* EPA

*'Promote Reuse at Civic Amenity Sites -The department recently issued its evaluation of civic amenity sites and how they can be improved. We concur that there must be more standardisation of the services and fees*

*charged. Additionally, we believe that there is great potential in some of the sites for reuse activities, including the collection of items for repair and reuse as well as courses on reuse and upcycling opportunities. We support the development of 'Recovery Parks'.*  
VOICE Ireland

*'The awareness and education campaigns will need much larger budgets if Ireland is to increase recycling rates. We need to make it a high priority for the majority of people if we are to have a step change in waste management performance in the country.'*  
IWMA

*'Packaging reuse will form an integral part of the circular economy and must be clearly defined in terms of what constitutes as reuse from both a business and consumer perspective.'*  
Repak

All the interest shown by the Plan stakeholders through this public consultation process and anticipated ongoing future support is what will help to ensure the success of Ireland's new National Waste Management Plan for a Circular Economy. The co-ownership model for development and implementation of the Plan is agreed in principle and how this approach can be achieved in practice will be considered as part of the Plan preparation.

The Draft New Waste Management Plan for a Circular Economy will consider these submissions and there will be another opportunity to influence plan progress when the draft plan is published for public consultation.

# APPENDIX A: NEWSPAPER NOTICE

Statutory Newspaper Notice published on 11th March 2021 in the following:

Irish Examiner, Irish Daily Mail, The Irish Independent, The Irish Sun, The Irish Times

## PUBLIC NOTICE

### Waste Management Act, 1996 and Waste Management (Planning) Regulations, 1997

Notice of Intention to commence preparation of the **National Waste Management Plan for a Circular Economy** to replace the existing Regional Waste Management Plans. This plan will be subject to a Strategic Environmental Assessment and an Appropriate Assessment.

A Briefing Note and the current Regional Waste Management plans can be viewed at [www.mywaste.ie](http://www.mywaste.ie)

Written submissions in relation to the preparation of the plan can be made to [info@srwmo.ie](mailto:info@srwmo.ie) or by post to Southern Region Waste Management Office, Lissanalta House, Dooradoyle Road, Limerick, V94 K6PO and/or by completing a short questionnaire on [www.mywaste.ie](http://www.mywaste.ie) by close of business on the **6th May 2021**.

This the **National Waste Management Plan for a Circular Economy** will be in respect of the Local Authority administrative areas as set out in the table below.

Region	Lead Authority	Local Authorities
Eastern-Midlands Region	Dublin City Council	Dun Laoghaire-Rathdown, Fingal, Kildare, Laois, Longford, Louth, Meath, Offaly, South Dublin, Westmeath & Wicklow.
Connacht-Ulster Region	Mayo County Council	Cavan, Donegal, Galway City, Galway County, Leitrim, Monaghan, Roscommon & Sligo.
Southern Region	Limerick City and County Council & Tipperary County Council	Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Waterford & Wexford.



southern  
waste region



eastern-midlands  
waste region



connacht-ulster  
waste region

[www.mywaste.ie](http://www.mywaste.ie)

# APPENDIX B: ORGANISATIONS THAT MADE WRITTEN SUBMISSIONS FOR PRE-DRAFT CONSULTATIONS\*

AON Apartment Owners Network

Ballynagran Landfill Ltd

Beauparc

BIGbin Waste Tech Ltd

Cement Manufacturers Ireland

CEWEP Ireland -Confederation of European Waste-to-Energy Plants

Clare Public Participation Network

Community Resources Network Ireland (CRNI)

Development Applications Unit, Government Offices

Environmental Protection Agency (EPA)

Indaver Ireland

Irish Food Packaging Alliance (IFPA)

Irish Waste Management Association (IWMA)

Maeve Thornberry & Associates

REPAK

VOICE of Irish Concern for the Environment

Zero Waste Alliance

\*Two private individuals made written submissions which were also considered in preparation of the draft plan.





