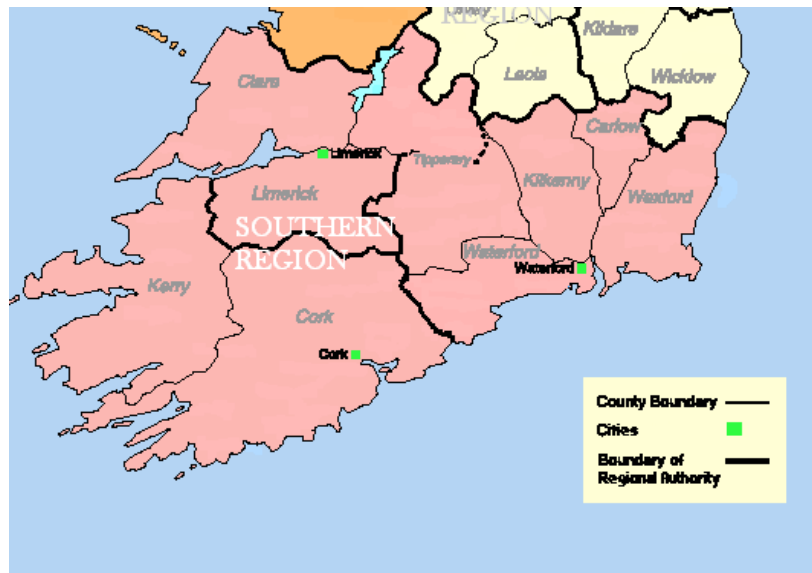


Southern Region Waste Plan

Pre-Draft Submission Report

March 2014



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Abbreviations

AA - Appropriate Assessment

BB - Bring Banks

C&D - Construction & Demolition

CAS - Civic Amenity Sites

CoR - Certificate of Registration

DECLG - Department of Environment Community & Local Government

ELVs - End of Life Vehicles

EPA - Environmental Protection Agency

EPS - Expanded Polystyrene

GSI - Geological Survey of Ireland

HWC - Household Waste Collection

LAPN - Local Authority Prevention Network

LCA - Life Cycle Assessment

MBT - Mechanical Biological Treatment

PRIs - Producer Responsibility Initiatives

PTUs - Pay-to-Use Compactor Units

RMCEI - Recommend providing for Minimum Criteria for Environmental inspections

SEA - Strategic Environmental Assessment

SI - Service Indicators

SMILE - Saving Money through Industry Links & Exchanges

WCPs - Waste Collection Permits

WEEE - Waste Electronic and Electrical Equipment

WFPs - Waste Facility Permits

WMPs - Waste Management Plans

1.0 Introduction:

Prior to 2013 Ireland was divided into 10 regions for waste management planning purposes. Following on from the publication of Department of the Environment, Community & Local Government (DECLG) documents, *“Waste Management Policy in Ireland –A Resource Opportunity”* (July 2012) and *“Action Programme for Effective Local Government-Putting People First”* (October 2012) and subsequent reform of Local Government structures the number of waste management planning regions was reduced from 10 to 3 in early 2013. The 3 regions are now as follows: Eastern & Midlands, Southern and Connacht & Ulster.

The Southern Waste Region has a population of 1,541,439 (34% of Ireland’s population) and currently incorporates 13 Local Authority areas namely: Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Limerick City, Limerick County, Tipperary North, Tipperary South, Waterford City, Waterford County and Wexford¹. The Limerick and Tipperary Authorities have been appointed as joint lead authority for the Southern Waste Region.

The European Communities (Waste Directive) Regulations, 2011 required the evaluation of existing Waste Management Plans (WMPs) by the 31st December 2012. In the Southern Region there were five plans evaluated namely:

- Replacement Waste Management Plan for the Limerick/Clare/Kerry Region 2006-2011
- The Waste Management Plan (WMP) for Cork County 2004 – Reviewed in 2009 however the review determined that no variation or replacement was required.
- The Joint Waste Management Plan for the South East Region 2006-2011
- Waste Management Plan for the Midlands Region 2005-2010
- The Cork City Waste Management Plan 2004 -2009

All the evaluations recommended preparation of a new plan to coincide with the new Southern Waste Region².

The process of the preparation of the new WMP, for the Southern Region, commenced with the publication of a notice of intention to commence preparation of the new WMP, in accordance with Section 22 of the Waste Management Act, 1996 and the Waste Management (Planning) Regulations, 1997, on the 10th October 2013 in the following national papers – Irish Examiner, Irish Independent 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:

¹ The number of Local Authority areas will reduce to 10 following the amalgamations of Limerick County & City, Tipperary North & South and Waterford City & County in June 2014.

² Until such time as the new plan for the Southern Waste Region is made the five existing Waste Management Plans, within the Southern Region, continue in force.

- a) All Local Authorities within the Republic of Ireland (Note: The Southern Region forwarded the letter to all County Managers, on behalf of the 3 waste regions).
- b) District Councils in Northern Ireland – ACR21, SWaMP2008 & North West Region Waste Management Group. (Note: The Southern Region forwarded the letters, on behalf of the 3 waste regions).
- c) Minister for Arts, Heritage and the Gaeltacht
- d) Minister for Agriculture, Food & the Marine
- e) An Taisce
- f) Fáilte Ireland
- g) Teagasc
- h) Health Service Executive

In addition to the notifications required in accordance with the Waste Management Act, 1996 and the Waste Management (Planning) Regulations, 1997, the Southern Waste Region also notified the following parties, within the Southern Waste Region:

- a) EPA waste licensed facilities
- b) Local Authority waste permitted facilities
- c) Authorised waste collectors (the National Waste Collection Permit notified the collectors on behalf of the three regions)

Members of the public and all stakeholders had until the 19th December 2013 to submit written submissions, in relation to the preparation of the plan.

This report summarises the submission received by the Southern Regional Waste Office.

2.0 Submissions Received:

The Southern Regional Waste Office received 38 submissions in relation to the preparation of the new Southern Regional WMP with 65% of the submissions from individual/stakeholders based within the Southern Waste Region (Refer to Appendix B for list of submissions received).

Table 1 gives details of the sources of the submission, the number of submissions from each category and associated percentages.

Table 1: Submissions received in relation to the preparation of the new WMP.

| Source | No. of Submissions | % Submissions |
|---|--------------------|---------------|
| Waste Contractors | 16 | 43.2% |
| State Organisations & Local Authorities | 9 | 24.3% |
| Representative Organisations | 7 | 18.9% |
| Actions Groups | 5 | 13.5% |
| Individuals | 1 | 2.7% |
| Total | 38 | |

Figure 1 charts the breakdown of the source of submissions received.

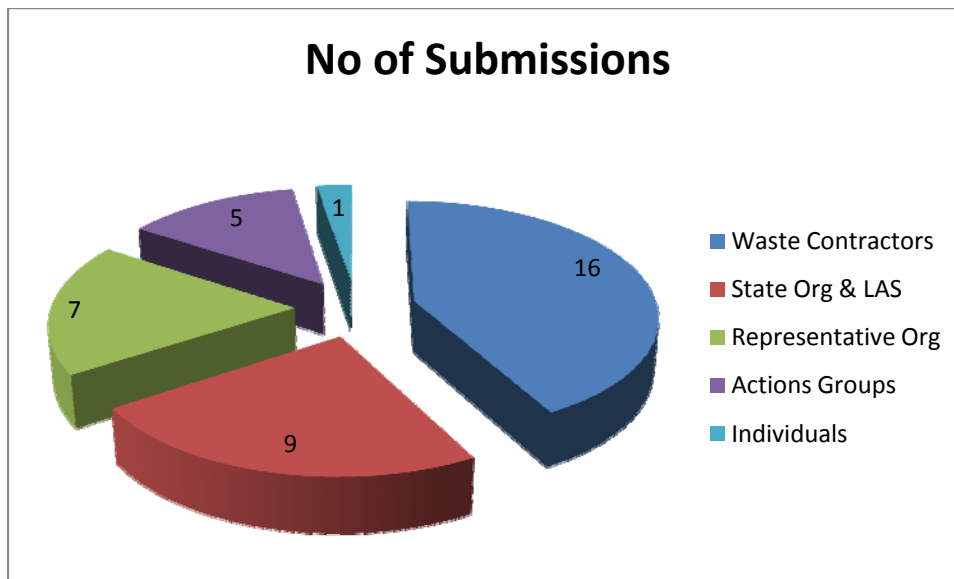


Fig. 1 Source of submissions received, in relation to the preparation of the new WMP

2.1 Details of submissions received:

The submissions received related to a wide range of waste issues yet a number of similar issues were raised in a number of the submissions received.

Figure 2 below illustrates the main issues raised and highlights waste infrastructure as the issue which received most concern.

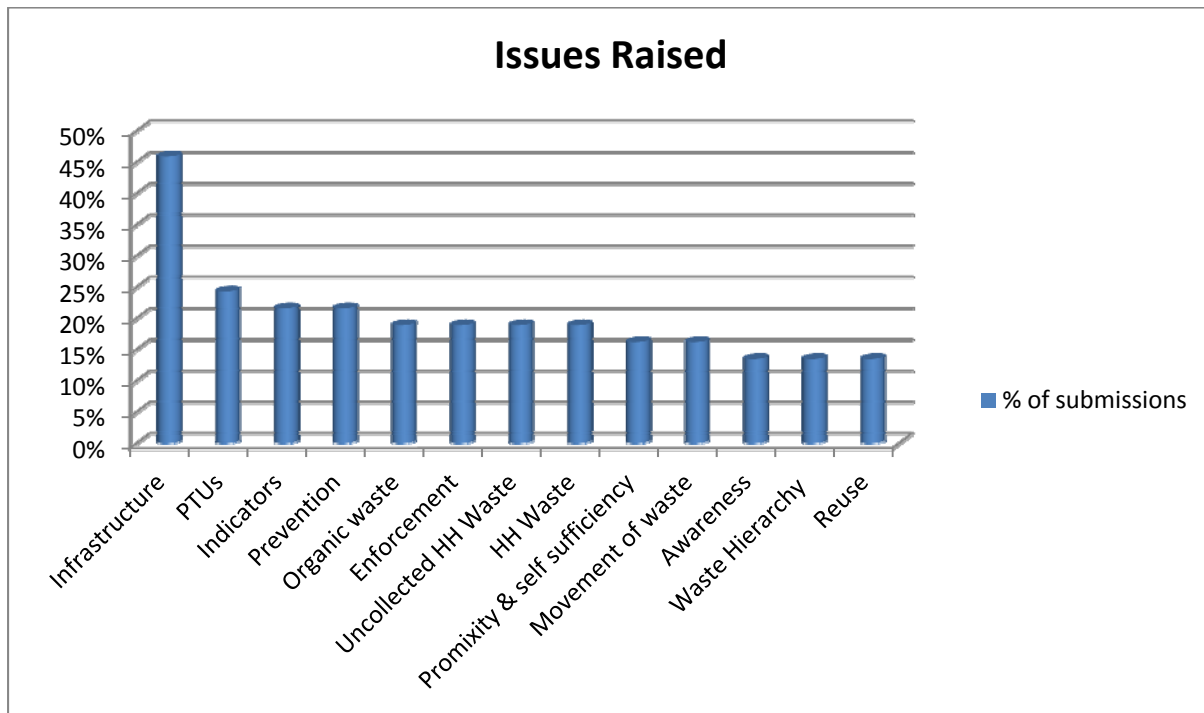


Fig. 2: Issues raised in submission received

The submissions received and details of same have been summarised under the following headings:

1. General submissions in relation to the preparation of the WMP
2. Waste Hierarchy
3. Household Waste
4. Movement of Waste
5. Infrastructure
6. Waste Projections & Statistics
7. Awareness Activities
8. Enforcement
9. Regulation
10. Monitoring & Implementation-Targets
11. Priority Wastes

Tables 2 -12 give a summary of submissions received under each of the above headings. Each of the headings has been further sub-divided to give clearer synopsis of the submissions.

Table 2.0: Summary of General submissions received in relation to the preparation of the WMP

| Sub-Category | Summary of submissions received: |
|--------------|--|
| General | <ul style="list-style-type: none"> • The WMP needs to give certainty to waste management. • The WMP should aim to comprehensively cover all relevant topics set by EU and national law, as well as current issues of local (plan area) or national significance. • A check-list is suggested as an analogous system of cross-referencing between the requirements of the Directive and the WMP contents. • The contents of the WMP should relate to its wider context and particularly over-lap areas with other facets of the environmental policy i.e. EU & national climate change agenda, renewable energy. • The term <i>resource</i> should be used throughout the WMP documents in order to promote the prevention/recovery agenda. Equally, the term <i>reuse</i> should be defined and used as distinct from recycling. • There are concerns that the reduction of the waste regions to three may cause additional difficulties in ensuring mutual compatibility between the three regions and all of the development plans. This shows the need to ensure that there is active consultation within Local Authorities and with other stakeholders regarding the content of the WMP. • The inclusion of a commitment to prioritise the employment of people with disabilities through the use of the Article 19 of the EU Public Procurement Directive, where an appropriate waste provider exists within the relevant market, was urged. • The relevance of the Geological Survey of Ireland (GSI) maps and datasets, including the new geoscience data, particularly during the Strategic Environmental Assessment (SEA) phase, was highlighted. |

Table 3.0: Summary of the submissions received in relation to Waste Hierarchy

| Sub-Category | Summary of submissions received: |
|-----------------------------|--|
| General | <ul style="list-style-type: none"> • The need to uncouple economic growth from waste production was highlighted • The need to observe the waste hierarchy and encourage higher order treatments was highlighted. • The Life Cycle Assessment (LCA) needs to be integrated into waste management solutions and that the concept of LCA promoted to producers, waste managers and the general public. |
| Prevention / Zero Waste | <ul style="list-style-type: none"> • There is a need for appropriate fiscal, economic and social incentives to ensure the necessary structural and behavioural changes required for effective waste prevention. • Prevention programmes (i.e. Local Authority Prevention Network (LAPN)) need to be properly financed and resourced with progress reviewed annually and annual action plan prepared. • The following waste prevention activities were suggested: <ul style="list-style-type: none"> ○ Local Authorities should be seen to lead the way in the community, particularly in relation to re-use ○ Engage with the Environmental Protection Agency’s (EPA’s) National Waste Prevention Programme ○ Enable a shift to preventative action in the community. ○ Develop a regional communications strategy to promote waste prevention • The need for greater focus on food waste prevention programmes was highlighted. • The need to prioritise hazardous waste prevention was highlighted. • In order to achieve “Zero Waste” the implementation of the “extended producer responsibility” on all sectors of Irish Industry was highlighted as a key requirement. It was recommended that all environmental assessments in the future include a “Zero Waste” Justification Test. |
| Reuse & Waste as a resource | <ul style="list-style-type: none"> • The WMPs need to provide financial and practical support for reuse solutions. • The concepts of reuse as a resource efficiency should be promoted and articulated with targets for re-useable waste streams specified in the WMP. • There is a need to ensure a minimisation of resources used during processes & packaging. • There is a need for strong support and encouragement, by incentive or legislation, for businesses to only put packaging and other products on the market which can be re-used, composted or easily recycled. • Opportunities and supports should be provided for businesses to connect in order to explore reuse options and opportunities of turning a waste into a resource i.e. SMILE (Saving Money through Industry Links & Exchanges) Resource Exchange • The WMPs should clearly include the community-based reuse, recycling and waste prevention as a sector in its own right and provide for the provision of tendering/procurement opportunities for |

Table 3.0 (ctd.): Summary of the submissions received in relation to Waste Hierarchy

| Sub-Category | Summary of submissions received: |
|-------------------------------------|---|
| Reuse & Waste as a resource (ctd..) | <ul style="list-style-type: none"> • community-based reuse/recycling organisations. • There is a need for appropriate collection facilities for waste destined for re-use and the provision of waste reprocessing facilities within Ireland should be encouraged, including investigating opportunities of furthering the reuse agenda at Civic Amenity/Recycling centres • The extension of the landfill ban to reusable items should be considered. • The extension of the producer responsibility initiatives (PRIs) should be considered, in particular for furniture reuse. • The re-use of Waste Electronic and Electrical Equipment (WEEE) should be fully supported. |
| Recycling | <ul style="list-style-type: none"> • The new WMPs should set out the measures necessary for the Region to become a recycling society • One submission received suggested introducing minimum recycling rates as a condition of Waste Collection Permits (WCPs). • It was highlighted that there is a need to develop markets for household dry recycling materials generated within the region. • WEEE – there is a need to maximise awareness among members of the public in relation to recycling and re-use of WEEE, in partnership with all relevant bodies. • Glass – the WMP needs to encourage the public to continue to ensure that targets in respect of glass recycling are achieved. • Paper - The WMP should prioritise measures to encourage the collection and recycling of waste paper by all stakeholders, particularly by businesses who are major contributors . • Expanded Polystyrene (EPS)- Consideration should be given to including segregated collection points for EPS in Civic Amenity Sites (CAS) to increase the level of waste that is diverted from landfill. However there is a need for awareness raising among members of the public to divert EPS from landfill. • The need to regulate and legislate (possibly bye-laws) for the collection and recycling of textiles to bring this activity in line with the collection and recycling of other waste streams and with best practice was highlighted. |

Table 4.0: Summary of the submissions received in relation to Household Waste

| Sub-Category | Summary of submissions received: |
|---|--|
| Household Waste Collection (HWC) - General | <ul style="list-style-type: none"> • A considerable number of submissions received highlighted the need for the requirements following from the outcome of the DECLG consultation on household waste collection to be reinforced in the WMP. • One submission suggested that the WMP should contain measures for the regulation of the household waste collection, the obligations on householders, the operation of the market and compliance and enforcement by local authorities. • The WMP should consider a medium to long term strategy to introduce greater efficiencies in waste collection i.e. numerous truck movements in urban areas. • The issue of getting previous service providers to remove old bins in a timely manner was raised. |
| HWC - Dealing with segregation for apartments | <ul style="list-style-type: none"> • Consideration should be given for a person or people living in a block of flats, housing estate, or community to organise waste separation, composting and transport to a licenced waste company on a communal basis. |
| HWC - Pay by Weight & Pricing Structure | <ul style="list-style-type: none"> • The WMP needs to address the household waste pricing structure & consider the impact of costs on householders. • The WMP must ensure that there is some fair and affordable solution, other than the door-to-door collection service, for single-person households and older people on low budgets who, by ‘reducing, reusing and recycling’, produce very little waste – e.g. the Big Bin system • It was highlighted that ‘Pay-by-use’ charging systems should be revised to create a greater incentive for waste reduction. • A considerable number of submissions highlighted the need for a ‘pay-by-weight’ system only, as it is the most effective option to incentivize waste reduction. However it should be as low as possible with waiver for low-income households. • One submission received ascertained that the ‘pay-by-weight’ system does not result in the highest level of waste minimisation and that suitable bin sizes and collection methods are more beneficial. |
| HWC - Organic Waste Collection/Brown Bins | <ul style="list-style-type: none"> • The urgent need for 3 bin waste collection service was highlighted. • The need to roll out the brown bin in the Cork Area was highlighted. • It was highlighted that any future mandated service levels must incentivize participation in the food waste collection service and be supported by a consistent incentivised charging structure. • There needs to be a level playing field for all operators to ensure provision of the brown bin, with enforcement of the legislation vital. • The quality of material collected in the brown bin needs to be addressed. • Where possible, green waste should be extracted for composting • In relation to the collection receptacle the submissions received generally advocated the use of the food waste caddy system however one submission received suggested providing customers with a minimum of 80lts bins with weekly collection. |

Table 4.1: Summary of the submissions received in relation to Uncollected Household Waste

| Sub-Category | Summary of submissions received: |
|---|--|
| Uncollected Household Waste (statutory declaration forms) | <ul style="list-style-type: none"> • A co-ordinated approach is required to address uncollected household waste i.e. statutory declaration forms, bye-laws • There is a need for an in-depth household waste collection survey to adequately assess the main contributory factors & address the issues. • A survey by a private waste collection company indicated that up to 60% of customers in some rural areas are not availing of a waste collection service. • The possibility of the DECLG making collection services mandatory needs to be carefully considered in terms of vulnerable customers and likely cost of administration & enforcement versus expected environmental benefits. • In relation to householders not participating in a collection service, alternative models i.e. central collection points should be considered. • Where bye-laws are in place there is a need for regulatory bodies to increase awareness and enforce the requirement for householders to avail of a collection service. |

Table 5.0: Summary of the submissions received in relation to Movement of Waste

| Sub-Category | Summary of submissions received: |
|---|--|
| Proximity Principle & Self Sufficiency & Waste Export | <ul style="list-style-type: none"> • The WMP should, where practicable, strive to comply with the principles of proximity and self sufficiency directly related to the island of Ireland and regional plan boundaries. However there is a need to accept the development of national infrastructure where regional infrastructure may be inappropriate. • Caution is urged in respect of deploying some of the methodologies used in the past, particularly with regard to “centres of gravity”, as it may preclude a commercial organisation from participating. • There is a need to acknowledge the dependence on economies of scale for waste facilities. • It was highlighted that the EU Court of Justice joined cases, C-53/02 and C-217/024, identifies a lesser requirement to include site identification criteria in a WMP. • A number of submissions highlighted that the WMPs should not be restrictive on the movement of waste abroad (unless for disposal) as it acts as form of safety valve in ensuring that national waste management prices remain competitive • A submission received states that the "self-sufficiency" and "proximity principles" are not intended to generally restrict waste exports within the EU. |
| Inter-regional movement of waste | <ul style="list-style-type: none"> • There is a need for the lead authorities to co-operate on inter-regional waste movements and provide a clear & concise policy. • The movement of waste should be determined by market forces. • The WMP should be cautious about trying to control waste within the country and should definitely avoid interfering with inter-regional movements of waste. |

Table 6.0: Summary of the submissions received in relation to Infrastructure

| Sub-Category | Summary of submissions received: |
|-----------------------------------|---|
| Infrastructure Planning | <ul style="list-style-type: none"> • The WMP needs to stimulate investment by providing strategic direction for all sectors. • The WMP needs to provide support for the longer term development of waste infrastructure (20-25 years) while also encouraging the timely development of new key waste infrastructure. • The WMP needs to provide for a solid commitment for a regional spatial strategy to be put in place, which supports the development of key local waste management infrastructure. • The Government must provide appropriate fiscal measures. • The WMP needs to encourage infrastructure development with private rather than public finance. • In relation to infrastructure the WMP must not be overly prescriptive in terms of location or technology types and must not hinder market-driven technical & economic advances • The WMP must take proper account of the potential for market-based policy instruments to encourage regional infrastructure i.e. landfill levy. • Existing infrastructure should be fully utilized before expending resources in the development of new infrastructure. • The WMP should identify the need for investment and make available high quality data and information to support this. • The lack of a live national register of waste permitted/certificate of registration facilities in the State is a significant information gap for waste infrastructure planning and also for legislative reporting purposes and needs to be addressed. |
| Infrastructure Capacities | <ul style="list-style-type: none"> • Extreme care should be taken about how the issue concerning the need to match waste arisings to infrastructural capacity should be handled. If misleading, there is the inherent danger that the contents of the WMP will either over- or under-estimate the required infrastructural needs. If un-built capacity is taken into account in a WMP in an imprecise manner, a WMP policy founded on such a calculation may deter or preclude other private sector investment. Extreme care is necessary to get accurate figures. |
| Pay-to-Use Compactor Units (PTUs) | <ul style="list-style-type: none"> • A considerable number of submissions received highlighted the need for a consistent Regional/National PTU policy. • Almost all submissions state that PTUs should be prohibited in all areas except where waste collection services are not provided and in holiday caravan parks. • One submission received was strongly opposed to any policy that limits their use to holiday home areas. • Where permitted they should be regulated in a manner consistent with door-to-door collection service. • The WMP should address any limitations or restrictions that maybe appropriate for the licensing of PTUs • The Limerick/Clare/Kerry PTU policy needs to be re-drafted in terms of the extended region and recent household food waste regulations. |

Table 6.0 (ctd.): Summary of the submissions received in relation to Infrastructure

| Sub-Category | Summary of submissions received: |
|--|---|
| Civic Amenity Sites (CAS) & Bring Banks (BB) | <ul style="list-style-type: none"> • The need to support the operation and growth of CAS, BB & green waste collection points was highlighted. • The WMP should support Local Authorities in continuing to improve management and maintenance at Bring Bank facilities including supporting the Bring Bank Stewardship Scheme. • Clare County Council have an objective of providing an additional Recycling Centre in South East Clare and it was requested that the new WMP reflect this objective. • The new WMP should make the collection of garden waste mandatory at all CAS. • There needs to be consideration as to how CAS can best maximise the reusability of WEEE through the provision of appropriate storage facilities. • The WMP should contain a review of all CAS & require introduction of a set of common operational standards. • The practice of accepting unsorted residual household waste must be examined & clear charging policy in compliance with polluter pays principle implemented. • A target for bring bank site density of 1 bring site per 600 inhabitants is urged with the process for locating bring sites in public and private sites made as simple and straightforward as possible i.e. operators should be facilitated as much as possible with lower fees and faster processing of Certificate of Registration (CoR) applications, the establishment of bring sites could be made a pre-condition of planning permission for new public shopping centres, garages, etc. |
| Mechanical Biological Treatment (MBT) | <ul style="list-style-type: none"> • As MBT can feature at different levels of the hierarchy any generalised waste plan policy statement re MBT cannot be justified. The WMP should contain a performance specification that defines exactly what MBT should entail. |
| Landfills/closed Landfills | <ul style="list-style-type: none"> • Waste management must not rely on landfills, incineration, so-called “waste-to-energy” solutions, or any other “end-of-pipe” approaches. • The new WMPs should have a focus on the virtual elimination of landfilling of municipal waste. • Landfill capacity – the WMP must clearly describe available disposal outlets remaining & comment on remaining lifespan. • Dormant Landfills - the WMP should make quite clear what is to happen to this dormant infrastructure i.e. when it is appropriate for a closed site with remaining void to come back on stream. Need to ensure that additional landfill capacity does not come back on-stream in an uncontrolled manner. The previous situation with over-supply & subsequent reduced gate fees should be prevented. • Closed landfills – the WMP should clearly describe the status of closed landfills on the register. The WMP needs to address the issue of the resolution of the issues surrounding these landfills including an appropriate method of funding their remediation. |

Table 6.0 (ctd.): Summary of the submissions received in relation to Infrastructure

| Sub-Category | Summary of submissions received: |
|---|---|
| Landfills/closed Landfills (ctd..) | <ul style="list-style-type: none"> • Holmestown Landfill Wexford – any new strategy should include the re-opening of this facility. • Bottlehill Landfill, Cork – the WMP should recognize that this facility could be reconfigured to meet other waste management infrastructural needs, such as an “Eco-park”. |
| Facilities for Farm Plastics/stabilised fines/sludges | <ul style="list-style-type: none"> • There is a need to encourage and give an incentive for farm plastic recycling and develop more markets for netting and twine etc. • It was proposed that provision for landfilling of stabilised fines is provided for in each waste region going forward and that over reliance on just one landfill in another region is avoided • The future for the collection of sludge waste needs to be clarified to ensure investment. |
| Specific Infrastructure (Other) | <ul style="list-style-type: none"> • There is a need to encourage the creation of a WMP that favours the continued use of waste derived alternative fuels in Ireland’s cement kilns as a long-term sustainable solution for integrated waste management. • The WMP needs to positively encourage energy recovery and ensure that there are no obstacles to the production of high quality alternative fuels by the waste management sector and their subsequent use in Ireland’s cement kilns. • Non-recyclable waste should be processed to produce energy with outputs used as inert vitreous building material. • There is a need to incorporate appropriately sized energy recovery infrastructure within the Region. • A concern was raised that the greater waste management area will simply favour the establishment and justification of a large scale incinerator, as all remaining landfill sites are closed. • The WMP should support Local Authorities in continuing to improve management and maintenance at compost facilities and the development of new infrastructure for composting as required. • There is a need for biological treatment of “green “ and organic household waste in the Cork Area • There is a need for greater emphasis on materials recovery facilities. • Anaerobic Digestion of source separated food waste should be considered as a recycling activity – rather than a recovery activity & above composting within the recycling tier. |

Table 7.0: Summary of the submissions received in relation to Waste Projections & Statistics

| Sub-Category | Summary of submissions received: |
|--------------------------------|--|
| Consistency across regions | <ul style="list-style-type: none"> • There is a need for transparent and consistent methodology across the regions for calculating statistics, future waste projections & for target setting. • The WMP should clarify what constitutes waste from households. |
| Regional Waste Data Indicators | <ul style="list-style-type: none"> • There is a need to set appropriate & transparent targets and metrics for all aspects of the WMP. • The regional waste data indicators chosen for the WMPs must be measurable, consistently applied across the three regions and have existing (or planned) validated data sources. • The indicators should ideally measure whether policy/legislation implementation and awareness/prevention campaigns are having an impact on behaviour. • The regional indicators should not be set based on national legislative EU targets (e.g. targets set under PR Directives and WFD). • The potential future waste reporting needs at NUTS2 level need to be considered when preparing reporting systems. Existing waste indicators, such as Service Indicators (SI) and the RMCEI (Recommend providing for Minimum Criteria for Environmental inspections) indicators, should be built into the WMPs where appropriate. • One submission received suggested the following regional waste indicators: <ul style="list-style-type: none"> ○ Household waste managed (tonnes, and kg per inhabitant) ○ Household waste generated (tonnes, kg per inhabitant) ○ Estimate of household waste uncollected (tonnes, kg per inhabitant) ○ Household waste collected at kerbside (kg per household served) ○ Quantity of kerbside residual household waste collected at kerbside per household served ○ Quantity of kerbside mixed dry recyclables collected at kerbside per household served ○ Quantity of kerbside organics collected at kerbside per household served ○ Quantity of household glass collected (kg per inhabitant) ○ Percentage of occupied houses not on a kerbside collection service ○ Percentage of serviced households on a 3 bin, a 2 bin and a 1 bin system |

Table 8.0: Summary of the submissions received in relation to Awareness Activities

| Sub-Category | Summary of submissions received: |
|------------------------------------|---|
| General | <ul style="list-style-type: none"> • The need to have a national coordinated education programme was highlighted. • The WMP should contain proposals for combined awareness raising activities within the region, in partnership with the other two regions and in partnership with other bodies such as compliance schemes and waste collectors, which have a legislative role in education programmes. The combining of these resources would result in a better overall impact in improving recycling and recovery of waste. • Consideration should be given to the establishment of a recycling module which could be delivered in national and/or secondary schools through syllabus subjects such as environmental and social studies. |
| Contracting an authorised operator | <ul style="list-style-type: none"> • The public need to be informed of the need for domestic waste water/septic tank sludge to be collected by an authorised person with the possibility of an incentive to do so examined. |
| Food Waste Awareness | <ul style="list-style-type: none"> • There is a need for a greater focus on food waste prevention programmes • The WMPs should promote a national co-ordinated education programme on use of the 'brown' bin. |
| Prevention Awareness | <ul style="list-style-type: none"> • The need for prevention education and appropriate supports for all sectors was highlighted. |

Table 9.0: Summary of the submissions received in relation to Enforcement

| Sub-Category | Summary of submissions received: |
|--------------------------------|--|
| General | <ul style="list-style-type: none"> • The enforcement policy, measures, penalties and resources required should be clearly described. • There needs to be assurance that Local Authorities have the competency and resources to fully conduct their responsibilities in the area of enforcement for the benefit of the whole waste management system. • The new WMP should support the operation and maintenance of the Local Authority enforcement team as an integral part of the waste management function • There is a need for consistent enforcement of authorised operators • There is a need for greater focus & enforcement of the Food Waste Regulations |
| Unauthorised/illegal operators | <ul style="list-style-type: none"> • A number of submissions highlighted the need for unauthorised operators to be strictly dealt with. One submission highlighted the need to address unauthorised domestic waste water collectors. |
| Polluter Pays Principle | <ul style="list-style-type: none"> • There is a need for the Polluters’ Pay Policy to be fully enacted and enforced. • The new WMP should support the implementation of a new series of on the spot fines for waste management offences other than litter fines |
| Bye Laws | <ul style="list-style-type: none"> • A number of submissions highlighted the need for consistent bye-laws across the Region. • Local Authorities within the region should be required to review all existing waste bye-laws & skip bye-laws following publication of the WMP, in order to provide degree of standardization. • The WMP should support the implementation of Local Authority bye-laws. |
| Effective Compliance Schemes | <ul style="list-style-type: none"> • The new waste planning regime must not hinder the operation of new or existing PRIs or cause them to be more expensive to operate. • Self-compliers must be subject to adequate oversight to ensure that the system of compliance schemes operates effectively. |

Table 10.0: Summary of the submissions received in relation to Regulation

| Sub-Category | Summary of submissions received: |
|--|---|
| Waste Facility Permits (WFPs) & Waste Collection Permits (WCPs) should include objectives of the WMP | <ul style="list-style-type: none"> • WCPs & WFPs issued must include conditions necessary to give effect to the objectives of the relevant WMP. Submissions received highlighted the need for any relevant policies to be clearly flagged in the WMP, preferably in a sub-section exclusively set aside to this purpose. |

Table 11: Summary of the submissions received in relation to Monitoring & Implementation - Targets

| Sub-Category | Summary of submissions received: |
|----------------------------|---|
| Indicators | <ul style="list-style-type: none"> • The WMP should strive to overcome the slow release of waste data and provide for frequently published official waste statistics. Timely release of data is essential in terms of measuring compliance with EU legislation and targets and also in the support of economic development. • The WMP must facilitate regular revision to allow for consideration of newly available statistics & policy changes that arise. There should be a partial review at least annually. • One submission suggested, in the absence of a regulator, the need for national co-ordinating body or national waste plan co-ordinator with steering group to ensure WMPs work cohesively to achieve national targets. |
| Annual Forum-Communication | <ul style="list-style-type: none"> • A number of submissions recommended an annual forum/workshop in conjunction with the annual review of the WMP, in order to discuss progress with relevant stakeholders. • The use of dedicated website to communicate aspects of the WMP was suggested. |

Table 12: Summary of the submissions received in relation to Priority Waste

| Sub-Category | Summary of submissions received: |
|--|---|
| Construction & Demolition (C&D) | <ul style="list-style-type: none"> • The need to ensure C&D waste aggregate and other waste materials suitable for reuse is targeted as a 'Resource Opportunity' by developing incentives and specifying targets and objectives in a consistent regulated environment was highlighted. |
| End of Life Vehicles (ELVs) | <ul style="list-style-type: none"> • The need for a consistent and targeted approach to waste enforcement with a focus on unauthorized ELV waste operators was highlighted. One submission received recommended that the level of enforcement on unauthorized ELV sites in Cork County Council should be replicated. • The issue of insurance companies employing illegal operators was highlighted and it was suggested that there should be a legal responsibility on the insurance companies to source a compliant operator to transport ELVs. |
| Hazardous Waste | <ul style="list-style-type: none"> • The SEA & Appropriate Assessment (AA) need to include adequate land-use provision for the investment required for hazardous waste disposal. It is also necessary to address the issue of public acceptance & community gain for projects of this nature. |
| Sludges | <ul style="list-style-type: none"> • The health impacts of spreading sludges need to be assessed as pastuerised sludges & composts are not sterile. |
| Waste Electronic and Electrical Equipment (WEEE) | <ul style="list-style-type: none"> • Means to achieve the revised WEEE targets needs to be considered along with the contribution WEEE Ireland and its partners have and will have in meeting the targets. |

3.0 Conclusion

A significant number of written submissions were received in relation to the preparation of the Southern Region WMP and the Local Authorities within the Southern Region acknowledge this contribution and effort of all those who made submissions.

The submissions received have been summarised in Section 2.1 of this report.

The submissions received will now be considered during the preparation of the policy, objectives and targets of the new Draft WMP for the Southern Waste Region.

The Draft WMP for the Southern Waste Region is scheduled for publication in quarter 3 of 2014³.

Following publication of the Draft WMP there will be a further two month public consultation phase which will be advertised in national papers and websites. Written submissions will then be considered prior to the making of the WMP for the Southern Waste Region.

³ Until such time as the new plan for the Southern Waste Region is made the five existing Waste Management Plans, within the Southern Region, continue in force.

Appendix A:

Statutory newspaper notice

Statutory newspaper notice published on the 10th October 2013 in The Examiner, Irish Independent and Irish Times.



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

NOTICE OF INTENTION TO COMMENCE PREPARATION OF REGIONAL WASTE PLANS

In accordance with Section 22 of the Waste Management Act, 1996 and the Waste Management (Planning) Regulations, 1997, notice is hereby given by the Lead Authorities, as set out in the table below, to commence the preparation of New Regional Waste Management Plans.

The current Regional Waste Management Plans in place may be viewed at:
www.epa.ie/waste/policy/regional/

Written submissions in relation to preparation of the Plans, with respect to the administrative areas of the Local Authorities, may be made to the contact details as set out in the table below by close of business on or before Thursday, December 19th 2013.

| Region | Lead Authority | Contact Address and Email |
|--|----------------------------------|--|
| Connacht-Ulster Local Authorities Cavan, Donegal, Galway City, Galway County, Leitrim, Mayo, Monaghan, Roscommon, Sligo | Mayo County Council | Regional Waste Coordinator Connacht-Ulster Region Waste Management Office, Mayo County Council Aras An Chontae Castlebar County Mayo 094 9024444 Email: rwmo@mayococo.ie |
| Eastern-Midlands Local Authorities Dublin City, DunLaoghaire/Rathdown Fingal, Kildare, Laois, Longford, Louth, Meath, Offaly, South Dublin, Wicklow, Westmeath | Dublin City Council | Regional Waste Coordinator Environment and Engineering Block 1, Floor 6 Civic Offices Dublin 8 01 222 2023 Email: engineering@dublincity.ie |
| Southern Local Authorities Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Limerick, Tipperary, Waterford, Wexford | Tipperary-Limerick Consortium | Regional Waste Coordinator Southern Region Waste Management Office, Limerick County Council, Lissanalta House, Dooradoyle, County Limerick. 061-496596 Email: rwmo@limerickcoco.ie www.managewaste.ie |

Appendix B:

List of Submissions

Table B2: List of Waste Contractors who forwarded a submission

| Name of Waste Contractor | Address | Local Authority Area |
|--|---|----------------------|
| Andrew McCarthy-Recovery Ireland | St Johns Park, Waterford | Waterford |
| Big Bin | Unit 1B Industrial Park, Cork Road, Waterford | Waterford |
| Bord na Mona | Main Street, Newbridge, Co.Kildare | Kildare |
| Clean Irl | Smithstown Ind. Est.,Shannon, Co. Clare | Clare |
| Country Clean Recycling | Ballygown, Mallow, Cork | Cork |
| Declan Doocey | Ballinara, Lismore, Co. Waterford | Waterford |
| Greenstar | Unit 6 Ballyogan Business Park, Ballyogan Road, Sandyford, Dublin 18 | Dublin |
| Indaver | West Pier Business Campus, Old Dunleary Road, Dun Laoghaire, Co. Dublin | Dublin |
| Killarney Waste Disposal Ltd. | Killarney, Co. Kerry | Kerry |
| Miltown Composting Systems Ltd. | Milltownmore, Fethard, Co. Tipperary | Tipperary |
| Pat Ahern | Barryscourt, Carrigtohill, Co. Cork | Cork |
| Patrick McCarthy | Carrig East, Clarina, Co. Limerick. | Limerick |
| Sheahan Waste Recycling Ltd. T/A Recycle Right | Luddenmore, Grange, Kilmallock, Co. Limerick | Limerick |
| Stream Bio-Energy | Carraig House, Brookfield Terrace, Blackrock, Co Dublin | Dublin |
| Tim McEllistrim | Coolkeragh, Listowel, Co. Kerry | Kerry |
| Valcroft Ltd., t/a Mr Binman | Luddenmore, Grange, Kilmallock, Co. Limerick | Limerick |

Table B3: List of State Organisations & Local Authorities who forwarded a submission

| Name of State Organisations & Local Authorities | Address | Local Authority Area |
|--|--|----------------------|
| An Taisce | Tailors' Hall, Back Lane, Dublin 8 | Dublin |
| Clare County Council (on behalf of the members of the Environment SPC) | New Road, Ennis, Co. Clare | Clare |
| Cork County Council | County Hall, Carrigrohane Road, Cork | Cork |
| EPA | Johnstown Castle Estate, Co. Wexford | Wexford |
| Geological Survey of Ireland (GSI) | Haddington Road, Dublin 4 | Dublin |
| Health Service Executive (HSE) | HSE South, Wexford Local Health Office, Whitemill Ind. Est., Wexford | Wexford |
| Limerick Institute of Technology (Thurles campus) | Nenagh Road, Thurles, Co. Tipperary | Tipperary |
| Rehab | Roslyn Park, Sandymount, Dublin 4 | Dublin |
| SMILE | Macroom Environmental Industrial Park, Bowl Road, Macroom, Co. Cork | Cork |

Table B4: List of Representative Organisations who forwarded a submission

| Name of Representative Organisations: | Address | Local Authority Area |
|---|---|-----------------------------|
| Cement Manufacturers Ireland (CMI) | Ibec Confederation House 84/86 Lower Baggot Street Dublin 2 | Dublin |
| Chartered Institution of Wastes Management (CIWM) | Castleview, Macroom, Co. Cork | Cork |
| Cré | Po Box 13, Dundalk, Co. Louth | Louth |
| Irish Business and Employers Confederation (IBEC) | 84/86 Lower Baggot Street, Dublin 2 | Dublin |
| Irish Motor Vehicles Recyclers Association | 14 Allendale Avenue, Melbourn, Bishopstown, Co. Cork | Cork |
| Irish Waste Management Association (IWMA) | 7 Dundrum Business Park, Windy Arbour, Dublin 14 | Dublin |
| WEEE Irl | Whelan House, South County Business Park, Leopardstown, Dublin 18 | Dublin |

Table B5: List of Action Groups who forwarded a submission

| Name of Actions Groups: | Address | Local Authority Area |
|--|---|-----------------------------|
| CHASE (Cork Harbour Alliance for a Safe Environment) | West End Terrace , Cobh, Co. Cork | Cork |
| Community Reuse Network | Ecostore, The Turnpike, Santry Cross, Ballymun, Dublin 11 | Dublin |
| CHASE- Monkstown, Passage, Glenbrook branch | Monkstown, Passage, Glenbrook branch | Cork |
| East Cork for a Safe Environment | Jamesbrook, Midleton, Co. Cork | Cork |
| Zero Waste Alliance | Túr na Gaoithe, Philipstown HBX, Castleblaney Rd, Dundalk Co. Louth | Louth |

Table B6: List of Individuals who forwarded a submission

| Name of Individuals: | Address | Local Authority Area |
|-----------------------------|-----------------------------------|-----------------------------|
| Julia Fairle | Bay View Grove, Youghal, Co. Cork | Cork |