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Dear Coordinator,

Ibec welcomes this opportunity to comment on the scope of the forthcoming Waste Management Plan for your Region. We are Ireland's leading business representative organisation, with several thousand member companies and non-profit organisations operating across the three Waste Management Planning Regions.

The following comments have been drawn up in consultation with our Environment Policy Committee, which includes a wide range of member firms who generate waste as well as specialist firms that recover, recycle, process and dispose of waste.

### ***Provision of Infrastructure***

The waste market in Ireland has developed over recent years in a manner that is not typical of other EU Member States. Household and commercial wastes are now collected in a competitive market arrangement that provides benefits to customers in terms of price and service, but which nonetheless requires a balanced approach by policymakers with regard to the provision of infrastructure.

The provision of adequate waste management infrastructure is important to the growth of the Irish economy. It is therefore vital that the new Regional Waste Management Plans (RWMPs) facilitate the timely development of such infrastructure. In so doing, the new plans should continue to respect the hierarchy of waste as per the Waste Framework Directive 2008 and must not hinder market-driven technical and economic advances that serve to advance the consideration of waste as a resource.

Previous Waste Management Plans in Ireland generally sought to promote the development of large-scale waste management infrastructure by the local authorities, either directly or through Public Private Partnerships (PPPs), and were quite specific on the technologies and appropriate locations for such developments. Some of this previously planned large-scale infrastructure ended up not being developed, and many local authorities have effectively withdrawn from the collection and/or processing of waste in Ireland.

As such, spatial planning and application of waste-hierarchy principles by regional authorities are hugely important for the achievement of public acceptance of infrastructure. However, the RWMPs should not be unduly prescriptive. Rather, they should provide general guidance within which private sector operators can identify appropriate technologies and locations based on technical and market criteria. To illustrate this point, we would argue that the widespread manufacture and use of

Solid Recovered Fuel (SRF) in Ireland was not accurately foreseen in previous waste plans. It has, nevertheless, had a positive effect in moving waste up the hierarchy as well as enabling Ireland to reduce its carbon footprint by substituting fossil fuel imports.

Ibec therefore suggests that the new RWMPs should encourage and enable market-led development of merchant infrastructure by waste companies, the cement industry and other entrepreneurs with private rather than public finance.

The RWMPs should also take proper account of the potential for market-based policy instruments (generally developed at national government level) to encourage the development of regional infrastructure. The landfill levy, for example, has been quite successful in diverting waste from landfill in Ireland, and is likely to encourage further investment. However, some of the instruments may need to be reviewed. In particular, the DCENR's Renewable Feed In Tariffs available for Anaerobic Digestion or Combined Heat and Power do not appear to have been as effective as the corresponding policy instruments adopted in Northern Ireland for the diversion of municipal and farm waste.

### ***Waste Exports***

Ireland is currently on target to meet its 2016 obligations under the 1999 EU Landfill Directive to divert Biodegradable Municipal Waste (BMW) from landfill. However, the country currently has a deficit of waste recovery infrastructure, and the export of municipal solid waste to Energy from Waste (EfW) facilities in continental Europe has become commonplace during the past few years.

One factor contributing to the current infrastructure deficit in Ireland is a continued lack of certainty over one particular project, namely the Poolbeg EfW project. The proposed facility is very large in comparison to the total size of the market for waste materials, so it has the potential to have a major impact on the economics of other infrastructure projects that would source from the same waste streams. Until Poolbeg – or an alternative waste recovery infrastructure – is developed, the option to export municipal solid waste is critical to Ireland's ability to meet the BMW diversion targets required by the Landfill Directive.

However, in the medium and long term the RWMPs should advocate (in accordance with the proximity principle and with the Waste Framework Directive) that Ireland become self-sufficient in the management of its municipal waste. Whilst we advocate self-sufficiency in management of our municipal wastes, we also acknowledge that stabilised wastes (notably RDF and SRF) can legitimately be traded internationally, particularly within the EU. This free trade will help to ensure that Irish waste recovery facilities are managed in a cost-competitive manner, to the benefit of domestic and commercial consumers.

### ***Municipal Waste Collection***

The logistics of waste collection in Ireland are especially affected by three key issues that could usefully be addressed in the RWMPs.

#### ***Uncollected Household Waste***



EPA data for 2011 suggests that approximately 1.2 million houses in Ireland are served with a waste collection service. The CSO data for that year suggests, however, that there are more than 1.4 million occupied houses in Ireland, so it appears that more than 200,000 residences do not directly avail of a waste collection service. This appears to have been the case for many years.

Undoubtedly, this is in part due to the fact that Irish householders are charged directly for waste collection rather than having the cost of the service included in a local or household tax, as is prevalent in most other EU countries. The positive side of direct charging is that the charging mechanism can influence household behaviour and thereby help Ireland achieve environmental goals and comply with EU Directives, particularly the Waste Framework Directive.

However, the corollary is a risk that increased non-collection of waste will result in alternative methods of waste disposal. Some of these disposal routes may be illegal, cause environmental damage, or impose costs that have to be recovered by local authorities. The RWMPs must address this issue seriously.

As a first step, better quality information is needed on the main contributory factors for non-collection at regional and local level. This should allow planners to assess cost-effective options to remediate the problem. Under a separate policy initiative (Household Waste), DECLG may well entertain the idea of waste collection services becoming mandatory for certain categories of household and businesses. This is worth considering carefully, subject to safeguards for vulnerable customers, and with due regard to the likely costs of administration and enforcement versus the expected environmental benefits.

#### *Pay-to-Use receptacles (PTUs)*

PTUs have been installed at many petrol stations and supermarkets throughout Ireland. They provide a waste disposal service for black bag (residual) waste and are generally regulated by Certificates of Registration (CORs) issued by local authorities. Some CORs are restrictive in terms of volume, monitoring, provision of a recyclables receptacle, etc., and other CORs are quite unrestrictive.

Although they may be used legitimately in some circumstances (e.g. remote rural locations or holiday home developments) there is a risk that inadequate regulation of PTUs may promote a 'race to the bottom' with householders in urban areas effectively opting out of the obligation for packaging and organic waste segregation. The RWMPs should therefore address any limitations or restrictions that may be appropriate for the licensing of PTUs.

#### *Number of Trucks*

Residents, particularly those in some city centres, have lodged complaints to local authorities about congestion and noise from competing waste firms sending their collection trucks along the same streets.

The problem is particularly evident in areas where commercial collections are carried out daily by many different waste collection companies. Storage arrangements for these wastes can be unsightly and therefore damaging to both business and tourism. An immediate solution is clearly difficult, but the RWMPs should consider a medium to long term strategy on this matter in consultation with

business groups and waste companies. The problem may only exist in some commercial districts, so evidence should be gathered in advance of any discussions on solutions to this problem.

Whilst Ibec favours competition in waste collection, we believe that the RWMPs should certainly consider all reasonable options to introduce greater efficiencies in waste collection. For example, the recent agreement between Dublin City Council and the waste companies that collect in Dublin City to introduce designated collection days in geographical areas of the City is a welcome development.

### ***Hazardous Waste***

There is a national deficit in infrastructure for hazardous waste disposal. It is important that the Strategic Environmental Assessment and Appropriate Assessments for each Region include adequate land-use provision for the necessary investment. It is also necessary to address the issue of public acceptance and community gain for projects of this nature.

### ***Producer Responsibility***

Ibec acknowledges that the promotion of new PRIs is a policy priority for DECLG. In some cases, local authorities are, or will be, significant beneficiaries of such schemes. It is important that the new waste planning regime does not hinder the operation of new or existing PRIs, or cause them to be more expensive to operate on behalf of obligated firms.

Yours sincerely,



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Head of Energy and Environment Policy

cc:

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