

National Waste Management Plan for a Circular Economy

Update

Following the Statutory Consultation Process



1.0 Background

The Waste Management Act 1996 requires each local authority to make a waste management plan and allows two or more authorities to jointly make a plan which must be evaluated once in every 6-year period. The evaluation of the existing regional waste management plans and the national policy document “A Waste Action Plan for a Circular Economy” recommended the replacement of existing plans with a single **National Waste Management Plan for a Circular Economy**.

The CCMA established a **Local Authority Sector National Oversight Group (NOG)** to oversee the development and making of the Plan on behalf of the sector.

The preparation of the Draft Plan commenced in Q3 2021 using a collaborative approach with key stakeholders to encourage co-ownership of the Targets, Policies, and Actions contained in the plan. The Draft Plan was completed in Q4 2022.

Following detailed consideration, the National Oversight Group recommended in Q1 2023 that the Draft Plan should proceed to statutory public consultation. On the 23rd of March 2023 the CCMA Executive agreed with this recommendation.

The plan:

- 1 Acknowledges the significant existing commitment from local government to waste functions.
- 2 Identifies the additional resources required to accelerate the transition to a circular economy.
- 3 Sets out an Ambition, Targets Policies and Actions for the sector.
- 4 Embeds collaboration with 66% of actions for local government and the balance shared with others.
- 5 Reinforces co-ownership with Key Deliverables for Key Partners including DECC and EPA

2.0 Consultation



The Draft Plan, Strategic Environmental Assessment and Appropriate Assessment were published for consultation on the 3rd of May 2023 with the closing date set at the 5th of July 2023.

The draft documents were made available online at mywaste.ie and at the offices of the lead authorities for waste planning.

The consultation process was promoted through statutory notices, press releases, newspaper ads, a radio campaign, and social and digital media posts. Submissions were invited online, by email or by post.

NATIONAL WASTEMANAGEMENT PLAN FOR A CIRCULAR ECONOMY

TIMELINE:

Q4 2019
Commencement of the evaluation of existing regional waste plans

Q3 2020
National Policy Document A Waste Action Plan for a Circular Economy

Q4 2020
Decision to proceed with a single National Waste Management Plan for the Local Government Sector

Q1 2021
Statutory Pre-Draft Public Consultation Process

Q2 2021
Completion of the evaluation of existing regional waste plans

Q3 2021
Commencement of the preparation of the Draft National Waste Management Plan

Q4 2021 / Q1 2022
Stakeholder engagement process

Q4 2022
Completion of the Draft National Waste Plan

Q1 2023
Approval from CCMA to proceed to statutory consultation for the Draft Plan

Q2 2023
Statutory consultation period

Q4 2023
Recommendation to CCMA to make the National Waste Plan

Q1 2024
Making of the National Waste Plan

3.0 Engagement

In addition to the arrangements made for submissions from the general public and external organisations the Regional Waste Management Planning Offices also undertook a series of direct engagements with internal groups within the Local Government Sector with roles in waste management and the circular economy.

Comments and feedback received during these engagements have been included in the review and all issues raised have been taken into consideration in the process of the completion of the final plan.

The Regional Offices also continued engagement with key stakeholder during this period to clarify positions and capture views.

Local Government Engagement:

- 1 Regional Steering / Operational Groups
- 2 Strategic Policy Committees
- 3 Full Council Meetings and Plenaries
- 4 Development Committees
- 5 Senior Management Teams

4.0 Consultation Report

Submissions

Key areas of interest:

- 1 Core Policies
- 2 Collection Systems
- 3 Recycling Infrastructure
- 4 Packaging Waste
- 5 Single Use Plastics
- 6 Reuse / Repair Infrastructure

Following the completion of the statutory consultation period a **Consultation Report** was produced summarising the submissions received and the proposed alterations to the Draft Plan. 381 submissions were received and categorised according to the Volume of the Plan they related to.

Each submission was considered in detail in conjunction with the feedback from the engagement with the local government sector and key stakeholders and a determination was made as to whether a revision to the plan was required.

The consultation report contains a schedule of proposed revisions to the draft plan to be included in the final plan.

Consultation Outcomes

Private citizens generally had a shared view of the key thematic drivers required to manage waste and increase circularity, whereas external organisations made more specific references to targeted policies and priority actions that may improve the implementation and outcomes of the plan.

There were no submissions received from the general public in relation to Volume I of the plan and submissions from external organisations give rise to largely technical revisions including policy references and current waste management capacity.

Submissions on Volume II of the Plan endorsed to overall ambition of **0% Waste Growth** while some adjustments to the national targets are proposed in the final plan including an overall plan target of 6% reduction in residual waste, 90% compliance for recycling bin content and a 10% increase per annum in material compliance in the general waste bin to encourage better segregation of materials. Following consideration of updated EPA data it is also proposed to increase the national reuse target to 20Kg per person per annum.

High Level Outcomes

National Target 1A

6% Reduction in rMSW (Plan Period)

National Target 2B

10% Increase in Material Compliance per annum (General Waste) leading to 90% compliance of general waste bin content by 2030

National Target 3B

Increase to 20kg per person per

Core Policy (Revisions)

CP5 Changing Behaviours

...to include polls surveys and research to support behavioural change.

CP7 Innovation

...to support research and innovation in the transition to a circular economy with a focus on non-kerbside materials.

CP10 Green Public Procurement

...to reinforce the application of GPP criteria in local authority contracts

CP12 Nationally Important Infrastructure

...to include criteria and thresholds for regionally important infrastructure.

CP13 Funding this Plan

...to include funding from relevant taxes and economic instruments.

Core Policies

There was significant public interest in the core policies of the plan with suggestions on how to achieve behavioural change and incentivise research and innovation across the sector.

The EPA support the embedding of Green Public Procurement across the local government sector while the Regional Assemblies support provisions for regionally important infrastructure to provide capacity in the regions.

There was also support for the use of financial or other economic instruments to support the implementation of the plan.

Focus Areas

Volume II of the Plan presents 16 Focus Areas with dedicated targeted policies and priority actions in each area. The focus areas are categorised into Operational, Material Stream and Infrastructural groups.

Operational Focus Areas

Operational Focus Areas include commercial and household waste, compliance schemes and collections systems.

Submissions in these areas emphasised the primacy of waste prevention, best practice, and enforcement to improve segregation. Submissions also highlighted the importance of the coordination of information campaigns and the costs of waste services and the need for more and better services. There was significant interest in the challenges associated with packaging waste, potential benefits of the proposed deposit return scheme and the impact of the coffee cup levy. With regard to collection systems submissions referred to bin sizes, collection times, collection routes and frequency, availability of brown bins and segregated glass collection. Specific submissions related to the collection of segregated consumer plastics, standardised collections at apartments, financial support for civic amenity sites and collection systems to facilitate reuse.

Operational Focus Areas (Revisions)

In general, the policy and action framework in this area addresses the submissions received however the following minor revisions are proposed:

General

To maintain and improve existing waste collection systems and provide viable alternatives for waste streams not serviced.

Collection systems provide for the capture of waste materials and include the preliminary sorting and storage of materials to facilitate transport to treatment facilities.

TP1.3 Strengthen the monitoring and accurate measurement of non-household commercial municipal waste flows.

PA1.1 Collaborate with other agencies to develop and deliver targeted awareness campaigns and projects to improve behaviours on prevention reuse and repair in non-household settings.

Material Stream

Focus Areas

Material Stream Focus Areas include food, packaging, plastic, construction, textile, and hazardous waste.

Submissions on food highlighted the urgent need to tackle consumption, provide services and implement better practices. The EPA highlighted the National Food Waste Prevention Road Map as a key driver.

Submissions on packaging emphasised prevention, a ban on non-recyclable packaging and support for reusables in addition to the obligations of manufacturers and retailers. Other submissions noted the significant regulatory challenges ahead with concern about single use plastic and the need for refill and deposit return options.

Construction waste submissions highlighted the need for innovation and financial incentives/penalties for recycling in addition to regulatory changes and increased enforcement.

Textile submissions called for urgent action on fast fashion, support for the charity sector and more facilities. The importance of good data was highlighted and the potential for new targets.

Submissions on hazardous waste called for additional collections for medicine and medical waste, a ban on disposable vapes and provision for lithium-ion batteries.

Material Stream Focus Areas (Revisions)

Food Waste

Purpose... To support the prevention of food waste in line with the UN SDG target to halve per capita global food waste by 2030 and to implement the National Food Waste Prevention Roadmap.

TP5.2 Coordinate the response of the local authority sector to the Food Waste Charter and the specific sectoral obligations contained in the National Food Waste Prevention Roadmap including regulatory and awareness activities.

PA5.3 Manage the procurement, delivery and monitoring programme for the national rollout of Food Waste Separation Packs to households.

PA5.6 Explore options to improve the harmonisation of the renewable feed in tariffs across the island of Ireland to incentivise the indigenous treatment of food/biowaste.

Packaging / Plastic Waste

PA6.2 Promote best practice and raise awareness of future obligations in the retail sector on reducing packaging waste including in-store packaging collection systems, deposit return schemes, promotion of reusable packaging and product refills.

PA6.4 Promote the use of recycled materials in packaging with designers and manufacturers to support the transition to the requirements of the revised Packaging and Packaging Waste Regulations.

PA7.2 Implement best practice with regard to single use plastic in the licensing of hospitality events and community sectors and prepare best practice guidelines for the sector for the elimination of single use plastic.

Construction and Demolition Waste

PA8.5 Explore the potential to segregate waste streams in mixed waste skips to minimise contamination and maximise reuse, recycling and circularity on all construction sites projects and provide guidance to the sector.

PA8.6 Allocate available resources, and identify any additional resources required, to consistently monitor construction and demolition sites projects to assess compliance with the project Resource & Waste Management Plan and apply appropriate enforcement measures to ensure compliance.

Hazardous Waste

PA10.1 Conduct awareness raising campaigns to highlight best-practices and alternatives, with initial focus on paints, cleaning products, lithium-ion batteries and gardening chemicals.

Infrastructural Focus Areas

Infrastructural Focus Areas include regulatory arrangements and reuse/repair, recycling recovery, disposal, and hazardous waste infrastructure.

Submissions on regulatory arrangements called for a ban on the export of waste, better regulation, education, and awareness of facilities and highlighted the need for more treatment capacity including for recycling and biowaste. Some submissions identified the restrictive potential of the siting guidance provisions however the guidance includes a measure of interpretative flexibility to address these concerns. Other submissions called for infrastructure development to be in compliance with all waste policy including the waste hierarchy and siting guidance.

Submissions on reuse and repair called for a range of interventions including more engagement with schools and support for investment in reuse repair infrastructure. The EPA called for a regulatory review of the class of activities for reuse and repair and for provisions around the collection of reuse and repair data.

Submissions on recycling called for more education, consistency on bins, more indigenous treatment, less export, and incentives for greater recycling in commercial and household settings.

Submissions on recovery infrastructure called for more education on facilities, the need for a recovery levy and to ensure that Waste to Energy is not prioritised over reuse and recycling. Other submission suggested facilitating community incinerators for energy and the diversion of all landfill waste to thermal treatment while the EPA suggested circularity criteria for specific waste streams.

Some submissions said that the plan provision for additional thermal capacity is to prescriptive however the provision has been calculated based on projected need and to ensure other targets are met.

Submissions on disposal infrastructure called for financial penalties on products likely to end up in landfill and for waste charges to be applied at point of sale.

The EPA suggested that contingency provision should be made for hazardous waste and the storage of non-hazardous wastes prior to recovery while CEWEP and CIWN Ireland suggested that contingency facilities could be better delivered by the private sector rather than the public sector.

Submissions on hazardous infrastructure called for a domestic disposal option for chemical products (e.g. paints), testing for specific substances at hazardous waste facilities and increased charges on comingled wastes.

Infrastructural Focus Areas (Revisions)

Regulatory

PA11.1 Ensure infrastructural developments are in compliance with the waste hierarchy, and siting guidance and other relevant national policy through engagement with An Bord Pleanála, and Planning Authorities and other relevant bodies.

Reuse Repair

TP12.1 Promote the development of repair and preparing for reuse initiatives with the provision of technical, regulatory and financial support working in partnership with the voluntary sector and other parties through the National Reuse and Repair Partnership.

TP12.3 Support the development of viable reuse/repair infrastructure and initiatives including materials recovery or other advanced pre-treatment infrastructure that increases the circular potential of materials.

TP12.4 Encourage the development of circular activities which stimulate and support viable secondary material markets and secondary product markets in the construction, industrial and bioeconomy sectors.

TP12.5 Investigate the appropriate authorisation regime for reuse and repair activities to facilitate the capture of reuse and repair data.

TP12.6 Collaborate with the EPA through the National Reuse and Repair Partnership to facilitate the capture of reuse and repair data.

Recovery

PA14.2 Set a circularity criteria goal for the output from biological treatment facilities and for soil and other construction and demolition waste streams.

TP14.6 Support the development of circular bioeconomy infrastructure and initiatives that align with the policies of this Plan and the National Bioeconomy Action Plan 2023-2025.

Disposal

PA15.4 Collaborate with the landfill operators to ensure residual municipal waste has priority to the available licensed landfill void capacity ensure that remaining void space is utilised primarily over and above other waste streams.

Delivery

The delivery roadmap for the plan is set out in volume III which considers broadly the potential impact of the plan, organisational considerations, and implementation strategy. There were limited submissions on this volume.

The EPA made some suggestions on the assignment of responsibilities and updating of projections to account for national waste decisions which will be reflected in the final plan.

The Competition and Consumer Protection Commission (CCPC) welcomed the proposed establishment of the National Coordinating Group for Waste and the Circular Economy (NCGWCE), as it is anticipated to lead to greater coordination between the three main bodies responsible for waste management policy DECC, EPA and LGS.

CCPC further welcomed the establishment of the Local Authority Waste Programme Coordinating Group (LAWPCG) which will play a key policy role for the LGS. Some commentary was provided by the CCPC on the roles of these new coordinating groups.

Peer Review

The Regional Waste Management Offices commissioned a Peer Review of the Draft Plan by ACR+ a Brussels based NGO promoting sustainability and circularity.

Key findings:

Plan is very well thought out and comprehensive with clear efforts to connect with policies.

Volume 1 is well structured with a solid assessment of the current situation backed with data.

Volume 2 is well articulated and clearly lists the key objectives and focus areas for the plan.

Volume 3 approach to the impact of targets and actions is highly interesting and illustrates the challenges.

Core policies are relevant and well explained and shared ownership is well reflected.

Organisation engagement and resources is very clear and proposed operational groups well thought out.

The continuation of collaboration with key stakeholders is very relevant as is public engagement through mywaste.ie.

Required resources are detailed fully while all potential supports should be evaluated.

The CCMA National Oversight Group has considered the Consultation Report produced following the Statutory Consultation period for the National Waste Management Plan for a Circular Economy together with the independent peer review of the Draft Plan.

The group recommended that the proposed revisions to the draft plan be applied and that the final plan be prepared.

The group further recommended that the chair of the National Oversight Group recommend to the CCMA Executive that the plan be made collectively by all Local Authority Chief Executives on a date to be agreed.

This recommendation was agreed by the CCMA Executive.

The National Oversight Group supports the recommendations regarding organisation and governance arrangements which if implemented with key partners will drive the achievement of the plan ambition, targets policies and actions.