



southern
waste region

Post Draft Consultation Report

Southern Region

Waste Management Plan 2015 - 2021



do one more thing

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1 INTRODUCTION

The Southern Waste Region was established in 2013 and is one of three waste regions in Ireland. The region has a population of 1,541,439 (34% of Ireland's population) and incorporates 10 local authority areas namely: Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Limerick City & County, Tipperary, Waterford City & County and Wexford.

The process of the preparation of the waste management plan (WMP), for the Southern Region (SR), commenced on the 10th October 2013 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. The submissions received were considered during the preparation of the policy, objectives and targets of the draft WMP and are summarised in the document *Southern Region Waste Plan – Pre-Draft Submission Report* (SR, 2014)

On the 18th November 2014 the Southern Draft Regional Waste Management Plan 2015 -2021 was launched and was the subject of public consultation between 18th November 2014 and 30th January 2015, in accordance with Section 23 of the Waste Management Act, 1996 and the Waste Management (Planning) Regulations, 1997. This report summarises the consultation process, the feedback received and the consideration of issues raised during consultation, including the recommended amendments or changes to the draft plan, where appropriate.

The amendments recommended in this report have been considered by the Southern Region Steering Committee and Operations Team and the amendments proposed will be presented to the Chief Executive in each of the 10 local authorities within the region, prior to the making of the Southern Region Waste Management Plan 2015 -2021.

2 CONSULTATION PROCESS

2.1 LAUNCH OF THE SOUTHERN DRAFT REGIONAL WMP 2015 -2021

The Southern Draft Regional WMP 2015 -2021 was launched on the 18th November 2014, in Galway City Council offices, as part of a national launch of the three draft regional WMPs. The Chief /Deputy Chief Executives of the waste management planning lead authorities formally jointly launched the draft regional WMPs along with the associated Natura Impact Report and Strategic Environmental Assessment (SEA) Environmental Report.



The event was attended by public representatives, members of the National Coordinating Committee for Waste Management Planning (NCCWMP), members of the Regional Waste Steering Groups, EPA, Department of Environment Community & Local Government (DECLG), staff from the Southern Region Waste Management Office (SRWMO), national and local press as well as the consultants RPS who assisted all three regions, in the preparation of the draft plan.

2.2 CONSULTATION COMPONENTS

2.2.1 Statutory Notifications

2.2.1.1 Newspaper Notice

Coinciding with the joint launch of the three draft regional WMPs and associated Natura Impact Reports and SEA Environmental Reports a newspaper notice was published on the 18th November 2014 in the following national papers – Irish Examiner, Irish Independent and The Irish Times, in accordance with Section 23 of the Waste Management Act and the Waste Management (Planning) Regulations, 1997 (refer to Appendix A-1 for copy of the newspaper notice).

The newspaper notice provided details on where the draft plan and associated documents were available (www.southernwasteregion.ie), the procedure for submitting written submissions/ observations and the deadline for submissions (4pm on the 30th January 2015).

2.2.1.2 Prescribed Bodies

In accordance with Section 23 of the Waste Management Act and the Waste Management (Planning) Regulations, 1997 a letter was forwarded to the following parties informing them of the

publication of the draft plan and associated documents, where they were available for download (www.southernwasteregion.ie), the procedure for submitting written submissions/ observations and the deadline for submissions (4pm on the 30th January 2015):

- Chief Executive of the local authority areas which adjoin the SR, namely Galway, Kildare, Laois, Offaly and Wicklow County Councils;
- Minister for Arts, Heritage and the Gaeltacht;
- Minister for Agriculture, Food & the Marine;
- An Taisce;
- Fáilte Ireland;
- Teagasc; and
- Health Service Executive.

2.2.2 Non-Statutory Notifications

In addition to the statutory notifications detailed in Section 2.2.1 the SRWMO also notified the following parties, within the SR, using a similar notification letter:

- EPA waste licensed facilities;
- Local authority waste permitted facilities;
- Authorised waste collectors (the National Waste Collection Permit (NWCPO) notified the collectors on behalf of the region); and
- Local Authority Environment Director of Services within the SR.

2.2.3 Members of Public

2.2.3.1 Press Releases

In addition to the newspaper notice the SRWMO prepared two press releases, one which coincided with the launch of the draft WMP in November 2014 and a follow up press release in December 2014. Both press releases were circulated to the local papers, within the SR, and to the relevant on-line platforms and were subsequently widely published. Refer to Appendix A-2 for copies of the press releases.

2.2.3.2 Information Leaflet – “We Want your Input – On One More Thing....”



The SRWMO prepared an information leaflet in order to brief members of the public on the publication of the draft WMP and encourage them to have their input. Refer to Appendix A-3 for a copy of the information leaflet.

The information leaflet provided details of the region, of progress since 2004 and how waste policy measures will improve the way in which waste is prevented and managed in the region. The public were encouraged to “*Tell us your views*” by the provision of a FREEPOST slip and the chance to win one of 10 restaurant vouchers worth €100 each.

The information leaflet was distributed through the local authorities within the region at public counters, libraries and in area offices. In addition to the information leaflet, copies of the draft reports in printed and/or CD format along with copies of the draft WMP executive summary were made available at the above locations.

2.2.3.3 Radio Campaign

In January 2015 the SRWMO co-ordinated a radio campaign across the local radio stations within the SR and these included Clare FM, C103/96, Radio Kerry, KCLR, Limericks Live 95fm, Tipp FM, South East Radio and WLR. A radio advertisement was aired, from the 5th to 11th January 2015, informing listeners of the draft plan and the public consultation period.

As a follow-up to the radio advertisement the SRWMO was invited to discuss the draft WMP on a number of the local radio stations.

2.2.3.4 Social Media

A copy of the draft WMP and the associated Natura Impact report and SEA Environmental Report were available for download on www.southernwasteregion.ie. In addition to this each of the local authorities within the region provided information about the draft WMP on their website or provided a link to the SRWMO website.

The website the SRWMO also established a twitter account @preventwaste which provided regular updates and reminders of the consultation process.

2.2.4 Presentations

As part of the consultation process presentations were given to a number of different groups.

2.2.4.1 Presentations to the Elected Members of the Local Authority

Following the publication of the draft WMP the SRWMO prepared a briefing document for the elected members of the local authorities within the SR. This document provided details of the draft plan including the background, the strategic vision and the three overall plan targets, our present position, how it is proposed to implement the plan and the consultation process. A power-point presentation was also prepared in conjunction with the briefing document.

The power-point presentation was presented at almost all local authority council meetings within the region and Table 2.1 below gives details of the presentations given to elected members (December 2014 – January 2015)

Table 2.1 – Details of the Presentations given to Elected Members (December 2014 – January 2015)

Local Authority	Date of Presentation	Presented By:
Carlow	12 th January 2015	SRWMO
Clare	12 th January 2015	SRWMO
Cork City	15 th December 2014	SRWMO
Cork County	16 th January 2015	SRWMO
Kerry	19 th January 2015	Kerry Co. Co.
Kilkenny	12 th December 2014	Kilkenny Co. Co.
Limerick City & County	12 th January 2015	Briefing document provided
Tipperary	8 th December 2014	Tipperary Co. Co.
Waterford	11 th December 2014	SRWMO
Wexford	8 th December 2014	SRWMO

2.2.4.2 Presentations to Local Authority staff

The SRWMO, in conjunction with the other two waste regions, held a briefing session for local authority staff on the 22nd January 2015. This session provided details of the background to the process along with a comprehensive overview of each of the parts of the draft WMP, how it is proposed to implement the plan and the consultation process. This event was attended by almost 100 local authority staff from across the country.

2.2.4.3 Presentations to the Waste Sector

The Regional Waste Coordinator from the SRWMO presented details of the draft WMP at the Waste Summit, organised by the Sunday Business Post on the 21st November 2014 in Dublin. The presentation included details of the background to the plan, strategic vision, three overall plan targets, present position, how it is proposed to implement the plan and the consultation process.

The Regional Waste Coordinator from the SRWMO also participated in a panel discussion on the draft WMP at the Waste Management Conference, organised by the Irish Waste Management Association, on the 25th November 2014 in Kildare.

The three regions had a joint information stand at both of the above events where copies of the draft plans executive summaries were distributed and queries from attendees addressed.

3 SUBMISSIONS RECEIVED & SUMMARY OF ISSUES RAISED

3.1 WRITTEN SUBMISSIONS FROM THE PUBLIC

A total of 28 written submissions were received from members of the public in relation to the draft WMP and these came from across the region (refer to **Appendix B – Table B.1** for a list of submissions). The majority of these submissions were made using the FREEPOST slip (refer to Section 2.2.3.2) while the remainder were received via email and letter.

The draft WMP sets out an overall strategic vision for the plan which is supported by 3 headline performance targets and 8 overall strategic objectives which are subsequently supported by a number of policies and actions.

The submissions received from the public have been categorised under the headings of performance targets or one of the 8 overall strategic objectives.

Figure 3.1 below illustrates the percentage of the public submissions received which dealt with one of the categories listed above.

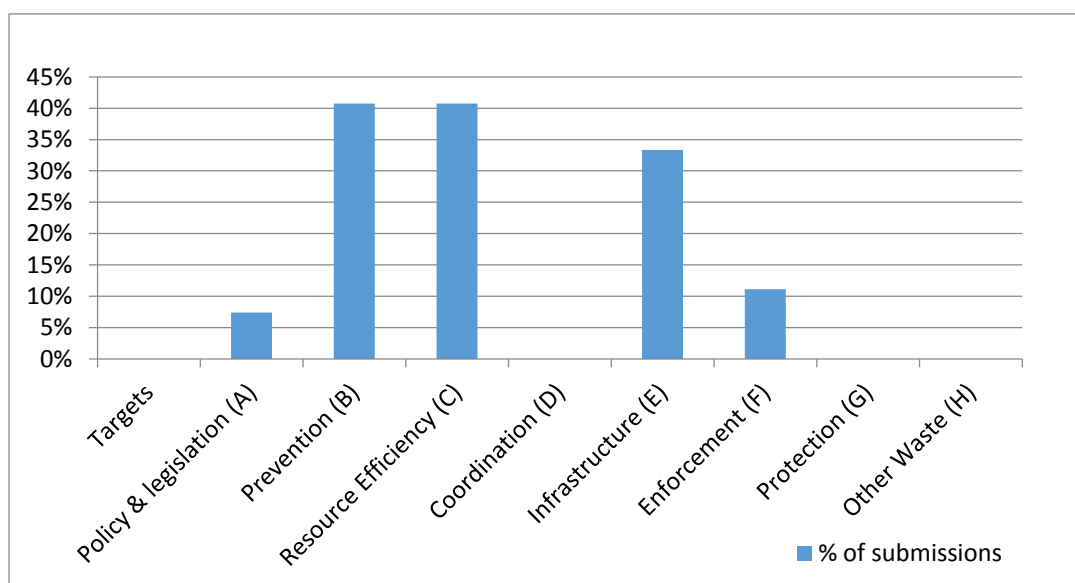


Figure 3.1 – Issues Raised in the Public Submissions Received

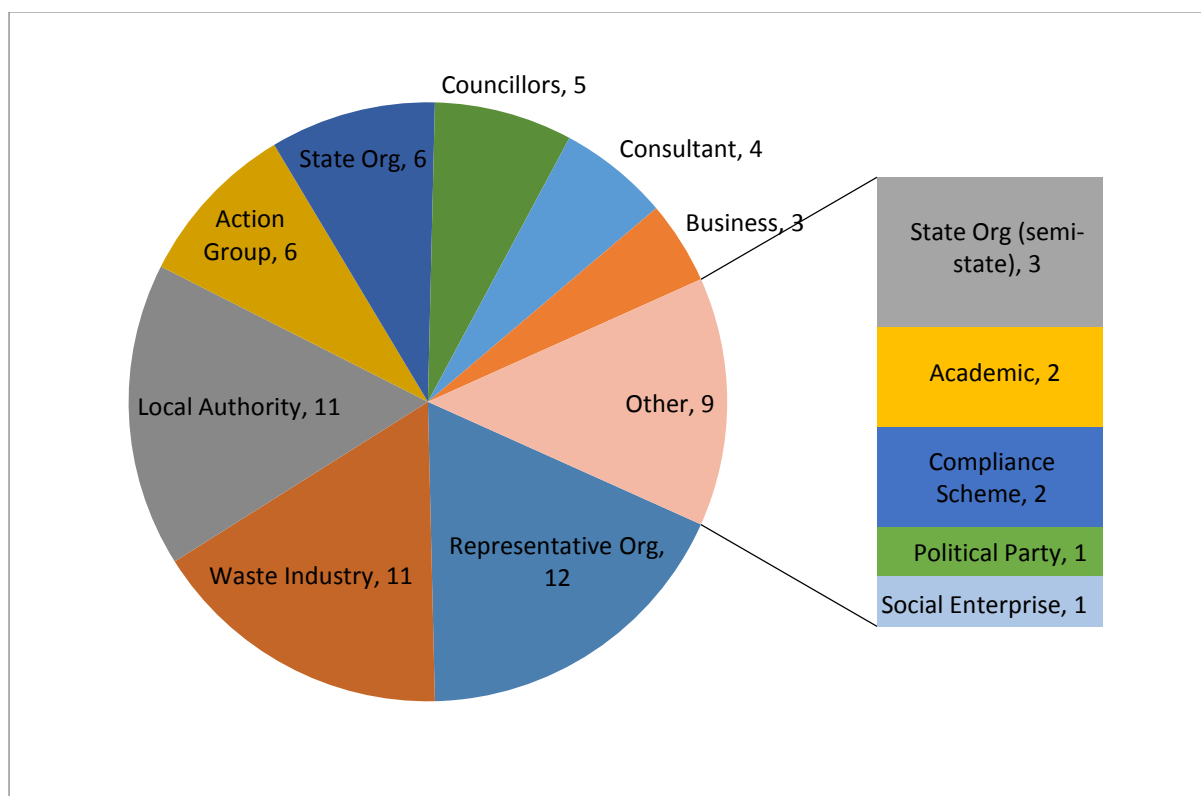
Figure 3.1 above shows that over 40% of the public submissions dealt with the resource efficiency / circular economy and prevention objectives. A significant number of submissions also dealt with the infrastructure objective (33%). Full details of the submissions are given in **Section 4**.

3.2 WRITTEN SUBMISSIONS FROM ORGANISATIONS & PRIVATE WASTE CONTRACTORS

A total of 67 submissions were received from various organisations and waste contractors, of which 57% were from organisations or companies based within the region (refer to **Appendix B -Tables B.2 –B.10** for a list of submissions).

The source of the submissions has been sub-divided into a number of categories and **Figure 3.2** charts the breakdown of the source of the submissions received.

Figure 3.2: Source of the Submissions Received From Various Organisations & Waste Contractors



Similar to the public submissions, the submissions received from various organisations and waste contractors have been categorised under the headings of performance targets, one of the 8 overall strategic objectives, the Natura Impact Report and Strategic Environmental Assessment (SEA) Environmental Report.

Figure 3.3 below illustrates the percentage of the submissions received which dealt with the categories listed above.

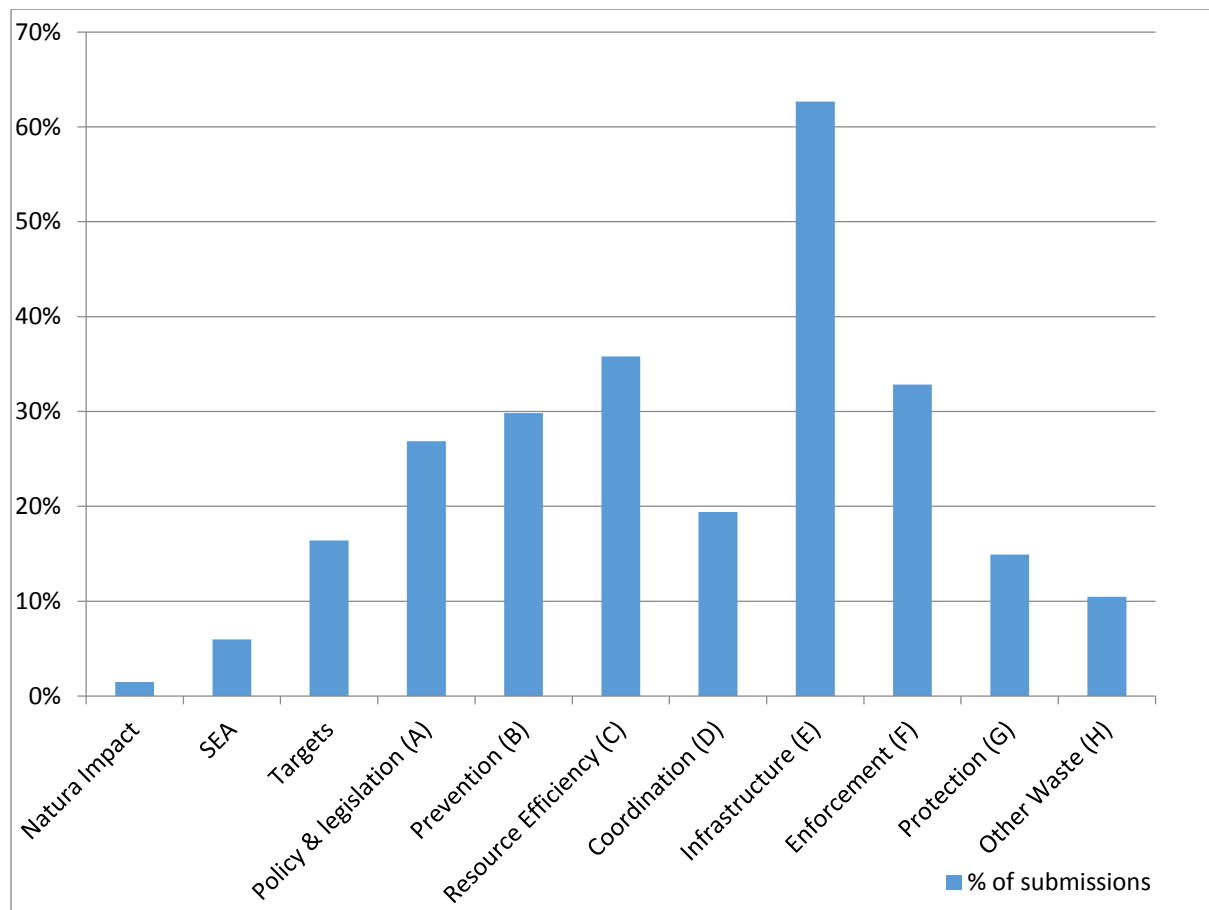


Figure 3.3 – Issues Raised in the Submissions Received From Various Organisations & Waste Contractors.

As evident from **Figure 3.3** the submissions received dealt with all areas', however over 60% of submissions dealt with the infrastructure objective with both resource efficiency and enforcement objectives dealt with in over 30% of the submissions.

4 ISSUES RAISED

All submissions were considered following the consultation process and this section provides details of the issues raised in the submissions received. This section provides our response to these issues and where relevant, recommended amendments to draft plan. (Submissions are not dealt with on an individual basis.)

The issues raised have been categorised in Section 4.1 and 4.2 as detailed in Section 3. Section 4.3 details the issues raised in relation to specific sections of the plan.

Issues raised in relation to the Natura Impact Report and SEA Environmental Report are summarised in the SEA Statement and Natura Impact Report.

4.1 ISSUES RAISED IN PUBLIC SUBMISSIONS

4.1.1 Policy and Legislation (Objective A)

One submission received raised concern regarding the cost of waste collection and the requirement to sign up to a service when they recycle almost all waste produced.

Our Response:

The cost of waste collection is outside the remit of the WMP however this issue will be dealt with in the proposed Waste Management (Collection Permit) Regulations, 2015 which the DECLG are due to publish shortly.

Recommended amendment(s) to Draft Plan:

None.

One submission received questioned the accuracy of the recycling statistics published.

Our Response:

- The draft WMP used every available verified source of waste statistics to ensure the plan portrayed a comprehensive statistical record of waste; and
- The draft plan did not include specific recycling rates however the following was reported:
 - % Household waste managed that was directed to recycling / recovery;
 - Kerbside household waste collected that was destined for recycling ('Destination REcycling (DREC)) / household served (tonnes / household); and
 - Quantity of non-household municipal waste recovered (tonnes / inhabitant).

Recommended amendment(s) to Draft Plan:

None.

4.1.2 Prevention (Objective B)

A number of submissions requested that there be more education in areas such as waste reduction, food waste and recycling. It was suggested that these campaigns take place in schools (particularly secondary schools) and public libraries.

Three submissions dealt with the need for reduction or elimination of packaging.

Our Response:

- Waste policies B2 and B4 deal with the areas of waste prevention and recycling activities along with education and communication (including campaigns); and
- Waste policy action B.4.2 requires coordination with manufacturers, designers, compliance schemes and national authorities on the development of waste prevention measures for products and services.

Recommended amendment(s) to Draft Plan:

None.

4.1.3 Resource Efficiency / Circular Economy (Objective C)

The submissions received dealt with the need to encourage the development of the reuse/repair area through workshops, incentivising business start-ups and encouraging use of charity shops.

Our Response:

- Policy C1 and its associated policy actions deal with the area of reuse and repair; and
- A new policy C5 and associated policy action has been inserted to support SMEs and industry

Recommended amendment(s) to Draft Plan:

- Policy C.5:
 - Policy – “Work with and through business support agencies and the National Waste Prevention Programme to encourage businesses and industry to implement resource efficiency principles including the use of clean technologies and preventing waste at source”
 - Policy action– “Encourage SMEs (including micro-enterprises) and industry to realise the environmental and economic benefits of resource efficiency”;
 - Target – “Promote the concept of resource efficiency among business support agencies.”

4.1.4 Infrastructure (Objective E)

A number of submissions dealt with bring banks / recycling centres and the need for provision for additional facilities and expansion of the materials accepted. A submission received also suggested setting up “Waste Management Warehouse Centres” where people could leave their green waste for free and purchase the composted material for a discounted price.

A number of submissions dealt with siting guidelines and there was disappointment that the draft plan was non-specific. They highlighted the need to ensure waste facilities are sited in appropriate areas with specific siting guidelines provided. One submission stated that they are completely against waste to energy initiatives anywhere in the country.

Our Response:

- The following waste policies deal with bring infrastructure (civic amenity sites (CAS) and bring banks):
 - E3a supports local authorities in maintaining and developing their existing networks of bring infrastructure;
 - E3b has been inserted to support the development by the private sector of public bring infrastructure – refer to wording below; and
 - E4 states that developers of commercial and large scale residential developments may be required to provide bring bank facilities as a condition of planning;
- Almost all CAS within the region accept green waste with some sites offering composted material to members of the public;
- Waste policy E17 supports additional biological treatment capacity for the treatment of bio-wastes (food and green wastes); and
- Waste policy action G.3.1 deals with the preparation of siting guidelines and sets a target timeline of 2015 for the preparation of siting guidelines which are to be reviewed biannually.

Recommended amendment(s) to Draft Plan:

- An additional policy, E3B, has been inserted and states *“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”*.

4.1.5 Enforcement and Regulation (Objective F)

Submissions dealt with the household waste collection service and the need to have a register of householders with a legal waste collection service. The need for proposed and existing facilities to be independently monitored at all stages of operation was also highlighted.

Our Response:

- The regulation of the household waste collection service is outside the remit of the WMP however this issue will be dealt with in the proposed Waste Management (Collection Permit) Regulations, 2015 which the DECLG are due to publish shortly; and
- The regulation and enforcement of authorised and unauthorised waste activities is dealt with under policies F2 – F4 and their associated policy actions.

Recommended amendment(s) to Draft Plan:

None.

4.2 ISSUES RAISED IN ORGANISATIONS & PRIVATE WASTE CONTRACTORS SUBMISSIONS

4.2.1 Headline Targets

A number of submissions recommended including additional targets such as:

- Roll out of organic bin;
- Increase the number of households on a waste collection service; and
- Increase the number of households that dispose of their waste in an appropriate sustainable manner.

One submission highlighted that the plan only sets targets for household and municipal waste and questioned where the quantifications and targets for wastes from other sources, such as industrial wastes, are.

Our Response:

- The targets specified are overall headline targets and the above suggested additional targets are specific and are dealt with in the plan's policy actions and targets (refer to Chapter 19);
- Whilst industrial waste is significant it is the responsibility of the EPA to control and set targets for industrial waste arising via waste licences i.e. IPPC/IPC/IED.; and
- It should be noted that there are separate EU targets for priority waste streams.

Recommended amendment(s) to Draft Plan:

- None.

4.2.1.1 Target 1

1% Reduction per Annum in the Quantity of Household Waste Generated per capita over the period of the Plan

A number of submissions stated that the target of 1% reduction is too low and various amended targets were suggested i.e. 2% reduction per capita per year, a 10% reduction over the lifetime of the plan, a 20-25% reduction over the lifetime of the plan. Reasons given for setting a higher target included the implementation of the pay-by-weight requirement of the proposed Waste Management (Collection Permit) Regulations, 2015 and prevention measures in addressing the 60% of household waste which the EPA have stated is avoidable.

However another submission received highlighted that a net reduction in the volume of household waste generated may not actually be realised, depending on future demographics and rate of population increase, particularly as we are coming from a challenging 'starting point' of recent low economic activity.

A submission received suggested the 1% reduction be measured on “household waste managed” rather than “household waste generated”

Our Response:

- As we are emerging from a period of recent low economic activity and with economic recovery anticipated, the challenge will be to ensure waste growth is decoupled from economic growth. Therefore a 1% reduction target is appropriate particularly as this is the first time a target has been specified; and
- Policy action G4 deals with addressing “unmanaged waste”. If the actions proposed are effective it would be anticipated that the total quantity of “household waste managed” would increase. Therefore “household waste generated”, which includes the “unmanaged waste” fraction is the most appropriate indicator.

Recommended amendment(s) to Draft Plan:

None.

4.2.1.2 Target 2

The target in the draft plan stated “*preparing for reuse and recycling rate of 50% of municipal waste by 2020*” comments received highlighted the need to clarify whether the target is based on municipal waste managed or generated. It was also highlighted that the EPA use household data rather than municipal data to report under this Waste Framework Directive indicator and that currently “preparing for reuse” is only measured for specific waste streams such as WEEE. Therefore reporting on “preparing for reuse” of municipal waste could be difficult particularly as most municipal waste generated in the region is exported for recycling.

*Achieve a
Recycling Rate of
50% of Managed
Municipal Waste
by 2020*

A submission received also stated that there should be separate targets for reuse and recycling thereby pushing towards reuse.

Our Response:

- The 50% target is in relation “managed municipal waste” – refer to amended target below; and
- It is not possible to quantitatively measure the “reuse rate” of managed municipal waste therefore the target has been reworded to only include the “recycling rate” – refer to amended target below.

Recommended amendment(s) to Draft Plan:

- Target 2 has been reworded as follows:
Achieve a recycling rate of 50% of managed municipal waste by 2020

4.2.1.3 Target 3



Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices*

A submission received recommended providing a definition or description of the term “unprocessed” in the plan.

Our Response:

- “Unprocessed residual municipal waste” means *‘residual municipal waste collected at kerbside or deposited at landfills/ CA sites/ transfer stations that has not undergone appropriate treatment through physical, biological, chemical or thermal processes, including sorting’*

Recommended amendment(s) to Draft Plan:

- A footnote has been inserted underneath this target with the above definition

4.2.2 Policy and Legislation (Objective A)

4.2.2.1 General

A number of general submissions were made in relation to the area of policy and legislation including introducing deposit-and-refund schemes (6 submissions), a pay-by-weight system for commercial waste streams and provision of a similar waiver system across the region.

Our Response:

- The regions suggested a pilot deposit-and-refund scheme to the DECLG as part of the plan implementation however as the scheme was not recommended under the PRI review the DECLG are not considering one at this time. Nevertheless further consideration of a local/regional pilot deposit scheme may be considered by the regions over the lifetime of this plan; and
- Limerick City and County Council are now the only remaining local authority providing a waiver system.

Recommended amendment(s) to Draft Plan:

None

4.2.2.2 Policy A.1

In relation to Policy A.1 and associated policy action the following comments were received:

- The implications of the recent European Court Judgement (ECJ) against Italy (C-323/13), in relation to the requirement to treat waste prior to landfilling, should be considered;
- New waste collection permit conditions should reflect the desire to move waste up the hierarchy to reuse; and
- There needs to be clarity in relation to how the requirement to have 0% direct disposal of unprocessed residual municipal waste to landfill from 2016 will be enforced through the collection permits and the extent of pre-processing required.

Our Response:

- The implications of the ECJ case C-323-13 have been considered and policy action A.1.1 amended – refer to rewording below;
- The new waste collection permit conditions, which are due to be prepared in Q2 of 2015, will take into account the targets, objectives and associated policies and policy actions of the plan; and
- A definition of “*unprocessed residual municipal waste*” will be included in the plan – as a footnote to Target No. 3 – refer to definition in Section 4.2.1.3.

Recommended amendment(s) to Draft Plan:

- Policy action A.1.1 has been reworded as follows: “*Move waste further up the hierarchy by eliminating the direct disposal of unprocessed residual municipal waste to landfill¹¹⁵*” Footnote “115” refers to “*ECJ 323/13*”

4.2.2.3 Policy A.2

In relation to Policy A.2 the following comments were received regarding implementation of the “polluter pays principle”:

- Waste companies whose business is focused 100% on recycling should be exempt from the landfill levy for the disposal of dumped waste, in the same way that waste generated from road sweepings and clean ups from littering and fly tipping are; and
- Reducing the landfill levy on waste that has been through a recycling process should encourage more recycle processing and capture.

Our Response:

- The amendment of the landfill levy comes under the remit of the DECLG and hence outside the remit of this plan, however the issue will be brought to the attention of the NCCWMP.

Recommended amendment(s) to Draft Plan:

- None.

4.2.2.4 Policy A.3

In relation to Policy A.3 and the associated policy action a number of comments were received regarding the preparation of the annual report including the need for improved data collection and additional key performance indicators (KPIs) for example “*splitting the reuse and recycling figures in annual reporting*” and “*including socio-economic KPIs for reuse and preparation for reuse*”.

Our Response:

- Chapter 20.1 has been amended to clearly state that existing data sources will be used, where available, thereby limiting additional data requests; and
- The three regions have agreed the KPIs to be reported on. It is not possible to quantitatively measure the “reuse rate”.

Recommended amendment(s) to Draft Plan:

- The target for Policy Action A.3.1 to be amended as follows
“*Prepare annual report **and disseminate findings***”
- Chapter 20.1 has been amended as above.

4.2.2.5 Policy A.4

In relation to Policy A.4 there was a suggestion that the “*aim to improve*” should be further strengthened by the identification of a timeline by which the exportation of mixed municipal waste (EWC 20 03 01) be ceased. It was also recommended that the bodies with responsibility for this policy continue to support ongoing research projects that seek to improve and expand reuse.

In relation to Policy Action A.4.1 two submissions recommended including a register of reuse organisations.

A submission received stated that in order to create an effective database, the ultimate treatment of waste streams should be properly categorised.

Our Response:

- Prohibiting the export of mixed municipal waste (EWC 20 03 01) comes under the remit of the DECLG and hence outside the remit of this plan, however the issue will be brought to the attention of the NCCWMP; and
- The maintenance of a register of reuse organisations would be outside the control of local authorities and / or the EPA so therefore this register would have to be independent of any database established for permitted or licensed facilities. It is important to remember if material goes directly for reuse it is not a waste.

Recommended amendment(s) to Draft Plan:

- In order to allow for any proposed economic instruments / other instruments that may be introduced as a result of the export study currently being undertaken by DCU on behalf of the DECLG. Policy A4 is amended as follows: *“Aim to improve regional and national self-sufficiency of waste management infrastructure for the reprocessing and recovery of particular waste streams, such as mixed municipal waste, in accordance with the proximity principle. **The future application of any national economic or policy instrument to achieve this policy shall be supported.**”*
- The target for Policy action A.4.1 is to be amended as follows: *“Establish, maintain and publish database”*

4.2.3 Prevention Actions (Objective B)

4.2.3.1 General

A number of general submissions were made in relation to the area of prevention and these included the need:

- For the plan to reflect the withdrawal of the European Circular Economy package and the fact it may be replaced with more ambitious targets; and
- To include an action on food waste in particular food waste prevention (Stop Food Waste Campaign) and home composting.

Our Response:

- Despite the withdrawal of the circular economy package the strategic visions of the plan which supports the circular economy will not change;
- Food waste prevention measures at a community/household level are detailed in Chapter 8.1.1 while measures implemented via national programmes are detailed in Chapter 8.3.6;
- Details of home composting and the master composter programme have been included in Chapter 8; and
- Policy action B.2.3 deals with the areas of food waste prevention and home composting.

Recommended amendment(s) to Draft Plan:

- References to the EU Circular economy package have been updated following the withdrawal of the package; and
- Chapter 8 amended as detailed above.

4.2.3.2 Policy B.1

In relation to **Policy B.1** a number of submissions requested that the role of the local authority staff be more clearly defined.

Our Response:

- The local authorities' role in relation to waste prevention is detailed in Chapter 17.2.3.

Recommended amendment(s) to Draft Plan:

- None.

Four submissions were received in relation to **Policy Action B.1.2** and in particular the target of the provision of a minimum of €0.15c/inhabitant to be spent on local prevention projects with almost all highlighting that the proposed funding was too modest and should be increased. It was also highlighted that the funding should be "*subject to systematic and ongoing review*" and be in addition to other funding sources.

A submission received suggested that the budget for waste prevention be explicitly mentioned in the executive summary.

Our Response:

- The €0.15c/inhabitant is an initial starting point and is in addition to any grant funding which may be provided. It is now proposed to review this funding annually – refer to rewording of policy action and associated target below; and
- The commitment to a minimum expenditure on waste prevention activities each year has been included in the executive summary as a key measure in “*how are we going to achieve these goals*”

Recommended amendment(s) to Draft Plan:

- Policy action B.1.1 reworded as follows to acknowledge other work undertaken by the EAOs: “*Appoint, where the role does not exist, or retain the role of the local authority Environmental Awareness Officers (EAO) on a whole time equivalent basis to work on activities **including the** implementation of the waste plan on a local and regional basis*”.
- Policy action B.1.2 (B.1.3 of the draft plan) reworded as follows: “*Ensure an on-going financial allocation is made in the local authority annual budgets to cover expenditure on waste prevention related activities over and above staff costs **and any grant aid***” with the target reworded as follows - “*A minimum of €0.15c/inhabitant to be spent on local prevention projects - **to be reviewed annually.***”; and
- Executive Summary amended as detailed above.

In relation to **Policy B.2** and the associated policy actions it was highlighted that the plan does not discuss home composting or include details of the local authority www.prep.ie service. In relation to Policy Action B.2.4 it was suggested that the baseline year should be 2015 and there should be an indicator linked to number of employees.

Our Response:

- Chapter 8 has been amended to include details regarding home composting and details of the www.prep.ie service;
- The baseline year in relation to the target for Policy Action B.2.4 has been changed to 2015; and
- The indicator for Policy Action B.2.4 has been amended – refer to rewording below.

Recommended amendment(s) to Draft Plan:

- Chapter 8 amended as above; and
- The target for policy action B.2.4 is reworded as follows - “*Reduce the quantity of waste generated at local authority head office by 10% over the baseline year **(2015)** during the plan period*”; with the indicator reworded as follows - “*% reduction over the baseline year **and/or % reduction per employee***”.

In relation to **Policy B.3** it was stated that this policy action should be key to strengthening Community Reuse Network Ireland (CRNI).

Our Response:

- Engagement with the CRNI will be considered as part of the regional framework.

Recommended amendment(s) to Draft Plan:

- No target was specified in the draft plan for policy action B.2.3. The following target has been inserted *“Engage with the EPA at least 3 times per annum on prevention issues”*

In relation to **Policy B.4** and the associated policy actions it was suggested that there be an initiative on hazardous paints, that industry be encouraged to design with reuse and recycling in mind using targeted measures such as taxes or PRI schemes. In relation to policy actions B.4.2 and B.4.3 it was stated that there needs to be clarity between "responsibility" and "key stakeholders" roles.

Our Response:

- Policy Action H.2.1 deals with establishing a pilot scheme for the management of paints.
- Policy Action B.4.2 deals with working with manufacturers and designers.
- Introduction of new PRIs, additional taxes and/or compliance schemes is the responsibility of the DECLG and outside the remit of this plan, however the issue will be brought to the attention of the NCCWMP;
- The body with primary responsibility for implementing a policy action has been bolded. Chapter 19.1 has been amended to state this.

Recommended amendment(s) to Draft Plan:

- Policy action B.4.2 - for clarity of responsibility “producer responsibility operators (PROs)” have been added under “responsibility”;
- The following statement has been included in Chapter 19.1 - *Each policy action has an associated target, an expected timeline, an indicator where relevant and identifies the in “**bold**” the body with primary responsibility who will be supported by the other body/bodies listed under responsibility for the implementation of the action.*

4.2.4 Resource Efficiency and Circular Economy (Objective C)

4.2.4.1 General

A number of general submissions were made in relation to the area of resource efficiency and the circular economy.

The need to retain the circular economy model as a guiding principal in the plan was highlighted in 3 of the submissions while 2 submissions stated that the “zero waste” concept needs to be taken into account as part of the circular economy.

The importance and potential of social enterprise in terms of reuse and recycling and the need for it to be acknowledged in the plans and catered for in the policy actions was highlighted in 2 submissions received.

It was highlighted that incinerators should not be considered as part of the circular principle as no materials are reused, recycled or recovered, however another submission received stated that use of waste as a prepared solid recovered fuel (SRF) in a cement kiln represents an example of the circular economy as the ash residues are incorporated within the cement clinker.

Our Response:

- Despite the withdrawal of the circular economy package the strategic visions of the plan which supports the circular economy will not change;
- In relation to “zero waste” the focus of the plan is to move waste up the waste hierarchy. The head line target *“reduce to 0% the direct disposal of unprocessed residual waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes”* is a significant step towards moving waste up the waste hierarchy and away from disposal;
- In terms of reuse and recycling the social enterprises will be engaged with under policy action C.1.3; and
- Activities such as incineration (waste-to-energy) and co-incineration (cement kilns) are considered to be thermal recovery activities (tier 2 of the waste hierarchy).

Recommended amendment(s) to Draft Plan:

- References to the EU Circular economy package have been updated following the withdrawal of the package.

Other issues raised included the need to:

- Include a policy action to provide support to SMEs;
- Work with CAS in relation to reuse projects;
- Recognise opportunities presented in relation to by-product and end-of-waste status; and
- Focus on enhancing the collection of quality materials, in particular organic waste, and ensuring all material is sent for recycling.

Our Response:

- Policy C.5 and policy action C.5.1 have been inserted to support business and industry— refer to wording below;
- The issue of reuse at CAS is dealt with in policy action C.1.2. The target and indicator have been reworded to provide a measurable action - refer to wording in Section 4.2.4.2;
- Chapter 3.2.3 has been amended in relation to end-of-waste status. Recognising the opportunities presented in relation to by-product and end-of-waste status is outside the remit, however the issue will be brought to the attention of the NCCWMP;
- Policy action C.2.1 deals with reviewing or introducing waste by-laws to maximise the quantity and quality of recyclable waste collected; and
- Policy actions F.1.4 and F.2.4 have been added to ensure adequate resources are allocated to ensuring roll out of the organic collection service across households and businesses.

Recommended amendment(s) to Draft Plan:

- Policy C.5:
 - Policy – *“Work with and through business support agencies and the National Waste Prevention Programme to encourage businesses and industry to implement resource efficiency principles including the use of clean technologies and preventing waste at source”*
 - Policy action– *“Encourage SMEs (including micro-enterprises) and industry to realise the environmental and economic benefits of resource efficiency”;*
 - Target – *“Promote the concept of resource efficiency among business support agencies.”*
- Section 4.2.4.2 details amendments to policy action C.1.2;
- Chapter 3.2.3 has been amended as above;
- Section 4.2.4.3 details amendments to policy action C.2.1; and
- Section 4.2.7.1 provides details of new policy actions F.1.4 and F.2.4.

4.2.4.2 Policy C.1

In relation to **Policy C.1** and the associated policy actions, comments included the need to set reuse and repair targets in relation to compliance schemes and specific waste streams and for the plan to support their achievement both in the private and public sector. The need for CAS employees to receive training on reuse was raised in 2 submissions.

Our Response:

- The target for policy action C.1.2 includes a 10% reuse target – refer to rewording below;
- Policy Action C.1.3 deals with engaging with reuse/upcycling networks and activities while Policy Action B.2.2 deals with collating and disseminating documentation on waste prevention;
- Implementation of incentives to make it easier for social enterprises and the private sector to set up reuse and recycling enterprises is outside the remit of this plan, however the issue raised will be brought to the attention of the NCCWMP; and
- The role of the lead authority/Regional Waste Management Office in Section 17.2.1, of the plan, has been amended to include details of their training role, which will include identify training needs at CAS – refer to wording below.

Recommended amendment(s) to Draft Plan:

- Policy action C.1.1 has been amended to include the following proposed SEA mitigation – *“A guidance note will be prepared for reuse and preparation for reuse activities at the local level to assist operators complying with relevant national regulations and delivering a positive sustainable service overall”*.
- Policy action C.1.2 has been reworded to go further than just reviewing the operation of CAS and is now as follows –
 - Policy Action – *“Review and amend (where appropriate) existing and/or condition the award of new local authority CA site contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations”*;
 - Target – *“Reuse/preparing for reuse of up to 10% of non-residual waste at local authority CA sites”*
 - Indicator – *“Tonnage reused/prepared for reuse per local authority CA”*
- The role of the lead authority/Regional Waste Management Office in Section 17.2.1, of the plan, has been amended to include the following – *“Identify, coordinate and facilitate the training needs of the region to ensure effective implementation of the plan”*.

4.2.4.3 Policy C.2

The need for the adoption of a kerbside sorted system of collecting recyclable materials to guarantee a higher quality of feedstock was highlighted in 2 of the submissions. Both submissions also stated that if this is not possible a 2-stream commingled system of dry recycle, for example separating paper and card from metal and plastic containers, should be adopted in order to yield a higher quality paper material.

Our Response:

- Chapter 16.4.10 – “collection infrastructure” has been amended to include details on multi-sort containers.

Recommended amendment(s) to Draft Plan:

- Chapter 16.4.10 amended as detailed above.

Policy Action C.2.1

The view that this policy action better fits national regulations than local bye-laws, as bye-laws can be less consistent and in some cases can be developed without consultation with the waste industry was raised in 2 submissions received.

Other comments received, in relation to Policy Action C.2.1 included the need to:

- Enforce existing regulations rather than the introduction of new bye-laws,
- Have a standard bye-laws format across the region;
- Bring forward the expected timeline of Q4 2018;
- Standardise the wastes which can be accepted into the green bin and brown bin through a national coordinated education programme.

Our Response:

- If policy action C.2.1 was to be introduced via national regulations it would be outside the remit of this plan and would result in a significantly longer lead in period. Bye-laws are subject to a public consultation phase prior to adoption;
- Policy action F deals with the enforcement of existing waste regulations;
- It is hoped to have regional consistency in the waste bye-laws through policy action C.2.1;
- Sufficient time must be allowed for the introduction of new or reviewed bye-laws as they have to undergo a public consultation period and are a reserved function of the council. Therefore an expected timeline earlier than Q4 2018 may not be achievable; and
- The issue of standardising the wastes which can be accepted into the recycling bin and/or brown bin is outside the remit of this plan, however it can be dealt with via the review/introduction of the bye-laws (policy action C.2.1) and the waste collection permit conditions which are due to be reviewed following the publication of proposed Waste Management (Collection Permit) Regulations, 2015. This issue will be brought to the attention of the NCCWMP.

Recommended amendment(s) to Draft Plan:

- Policy action C.2.1 has been amended to allow for the amending / replacement of existing bye-laws and is now as follows:
 - Policy Action: - *“Review/introduce presentation of waste bye-laws, across the region, to maximise the quantity and quality of recyclable waste collected and amend /replace/introduce new if appropriate.”*
 - Target - *“Review existing bye-laws.”*
 - Indicator – *“Number of bye-laws reviewed/introduced.”*

Policy Action C.2.2

Two submissions received highlighted that this policy action could interfere with the normal operation of the waste market and could unnecessarily impact on the competitiveness of facilities. It was also stated that *“encouragement of waste industry behaviour must be based on national instruments (e.g. landfill levy /TFS regulations) rather than individual facility authorisations”*.

Our Response:

- The target for policy action C.2.2 has been amended to include a statement that the code of practice will be produced in consultation with the EPA, thereby ensuring a level playing field for all authorised sites.

Recommended amendment(s) to Draft Plan:

- The target for policy action C.2.2 has been amended as follows – *“To produce the code of practice **in consultation with the EPA.**”*

4.2.4.4 Policy C.3

In relation to **Policy C.3**, 2 submissions received recommended that a working group be established to implement this action.

Other comments raised included the need to develop a national approach and to provide an industry reuse expert through the Local Enterprise Office (LEO) mentoring system.

Our Response:

- Establishment of a working group to implement policy C3 is outside the remit of this plan, however the issue will be brought to the attention of the NCCWMP;
- The 3 lead authorities will work together in order to support market development for secondary materials;
- The lead authority will support the LEO as much as possible; and
- A new policy (C5) and associated action has been inserted to support business and industry to implement resource efficiency principles – refer to wording in Section 4.2.4.1.

Recommended amendment(s) to Draft Plan:

- Section 4.2.4.1 provides details of policy C5

4.2.4.5 Policy C.4

In relation to **Policy C.4**, 2 submissions received highlighted the need to support social enterprises in bidding for public contracts, particularly as they make up a sizeable proportion of the reuse sector. A submission received suggested the inclusion of a social clause in public procurement criteria as well as a resource efficiency clause, as these are not unusual in mainland Europe.

Our Response:

- The issues raised in the above submissions are national issues and hence outside the remit of this plan, however they will be brought to the attention of the NCCWMP;
- Policy action C.4.2 has been amended to include the Office of Government Procurement (OGP).

Recommended amendment(s) to Draft Plan:

- Policy action C.4.2 has been reworded as follows:
 - Policy action: - *“Implement a systematic engagement with local / regional local authority procurement officers **and the Office of Government Procurement (OGP)** to ensure the inclusion of resource efficiency criteria in contracts”;*
 - Target - *“To meet with local / regional procurement officers **and relevant staff of the OGP.**”*
 - Expected timeline – *“**Annually from Jan 2016 onwards.**”*

4.2.5 Coordination Actions (Objective D)

4.2.5.1 General

A number of general submissions were made in relation to the area of coordination actions and these included recommendations to establish a national waste plan co-ordinating committee, have on-going engagement with relevant stakeholders and including a policy in relation to accessing environmental information in a consistent manner across the country.

Our Response:

- The national coordination committee for waste management planning (NCCWMP) was established prior to the preparation of the plans and it is intended that this committee will continue to be in place over the duration of the plan;
- Policies D.3 and D.4 deal with stakeholder engagement;
- The target for policy action A.3.1 (re preparing an annual report) has been amended to state that the information will be disseminated.
- Including a policy in relation to accessing environmental information is outside the scope of the plan, however the issue will be brought to the attention of the NCCWMP;

Recommended amendment(s) to Draft Plan:

- The target for Policy Action A.3.1 to be amended as follows
*“Prepare annual report **and disseminate findings**”*

4.2.5.2 Policy D.1 – D.4

In relation to the specific policies and policy actions listed under Strategic Objective D the following comments were received:

- **Policy D.2** – it was suggested that there should be a commitment included to review and increase staff over time along with the allocation of a prevention/resource efficiency officer in each local authority;
- **Policy D.3** – the need to support ongoing reuse research projects was raised in 2 submissions, the need to support businesses in developing eco-design products along with the establishment of regional and/or national symbiosis programmes was also highlighted;
- **Policy D.4** – it was recommended that CRNI, as the national representative body for reuse, be included in this policy.

Our Response:

- Policy D.2 deals with the structures required to implement the plan on a regional basis. Increased posts would have to be sanctioned by the DECLG and are outside the remit of this plan, however the issue will be brought to the attention of the NCCWMP;
- While ongoing research projects are essential to the successful implementation of the plan, their support is outside the remit of this plan, however the issue will be brought to the attention of the NCCWMP;
- A new policy (C5) and associated action has been inserted to support business and industry to implement resource efficiency principles – refer to wording in Section 4.2.4.1;
- Stakeholder involvement as detailed in Policy D.3 will promote high order waste activities; and
- CRNI are included under “*stakeholders*” in Policy D.4

Recommended amendment(s) to Draft Plan:

- Policy action D.2.1 has been reworded as follows - “*Establish and/or maintain funded regional waste management office and the requisite structures (including administrative, technical & communication) to implement national and regional policy*”;
- The target for policy action D.2.2 has been reworded as follows- “*Ensure roles are in place **or maintained***”; and
- Policy action D.3.1 has been reworded as follows:
 - Indicator – “*Number of partnerships and networks established, research & **pilot** projects undertaken*”;
 - Responsibility – “***Lead Authority**, local authorities, EPA, DECLG & all relevant network partners **and stakeholders***”.

4.2.6 Infrastructure (Objective E)

4.2.6.1 General

As evident from **Figure 3.3** over 60% of submissions, from organisations and private waste contractors, dealt with the infrastructure objective, with 29% of these submissions dealing with policy E15 (in relation to the plans support of up to 300,000 tonnes of additional thermal recovery capacity) and 24% dealing with policy E17 (in relation to the plan's support of up to 40,000 tonnes of additional biological treatment capacity).

A number of general submissions were made in relation to the area of infrastructure and these included:

Authorised capacity analysis and control of waste infrastructure:

- *"It is important that the policies and policy actions in relation to infrastructure do not introduce additional uncertainty and unpredictability into the outcomes of future planning applications for waste facilities, or create unintended consequences, e.g. unintended competition issues";*
- 4 submissions raised concern regarding how the "need" issue is being portrayed as the analysis presented is desk-based and therefore incomplete and too broad to provide a detailed understanding of the needs of the market;
- 5 submissions stated that the potential for development of waste facilities should not be restricted (other than proposed location) by the planning process as the need will be predominantly market-led, similar to other open competitive markets;
- 27 submissions dealt with the capacity data and policy statements which include quantum restrictions /capacity caps / planning requirements. Difficulties and issues raised include the following:
 - *"May prevent existing and successful waste businesses expanding and offering more comprehensive waste treatment services";*
 - *"May cause the existence of authorised but unsophisticated waste facilities to block other development that might have a more desirable level of waste recovery";*
 - *"May preclude investment that may be significantly more viable if unbuilt capacity is being taken into account when assessing the "need" issue; - Many existing or pending facilities are not usable, particularly as licences for pending facilities can take 4 years or more to be granted";*
 - *"Command and control has no place in this market, above the 'disposal' tier in the waste hierarchy and would result in infrastructural development stagnating";*
 - *"Restricting capacity within a region would seriously hamper waste management & innovation within the region";*
 - *"If waste is a resource then innovations developed in Ireland may allow for the import of waste and any capacity cap may inhibit development in this sector";*
 - Concern that competitor's may over-charge for available capacity or refuse to make it available, as additional capacity cannot be developed; and

- *“Some recycling or re-processing infrastructure (including biowaste) may only be viable at a scale in excess of the regional market analysis”.*

Our Response:

- It is intended that the infrastructure policies and associated actions along with the siting guidelines, which will be published later this year will provide certainty to all concerned in relation to the authorisation of waste facilities over the lifetime of the plan;
- A comprehensive review of the treatment capacity market was undertaken and the findings of this analysis as well as projected waste growth, pending facilities and targets of the plan were considered in preparation of infrastructural policy statements. Policy E15 has now been amended to allow consideration of authorisations above 300,000t/year where they can be justified and verified. Policy E17 has been updated to ensure the 40,000t/year is not considered a limit for biological treatment; and
- The plan supports the full range and size of appropriate existing and developing waste technologies across all tiers of the waste hierarchy (other than disposal);.

Recommended amendment(s) to Draft Plan:

- Refer to details in Section 4.2.6.2 – 4.2.6.11 regarding changes to the specific infrastructure policies

Data presented in relation to authorised facilities:

- ‘Consented infrastructure’ and ‘available infrastructure’ details should be separated out and capacities of both provided in the Appendices (2 submissions);
- The plan should only highlight active facilities i.e. 101 reported 0 intake in 2012;
- More up-to-date information should be provided as it is possible that a number of permits from 2012 are now surrendered/expired;
- Applications to the EPA for Industrial Emissions licences should be listed; and
- A separate on-line and publicly open waste data management system (live & up-to-date) should be established to complement the plan.

Our Response:

- As a national capacity register is developed a clearer picture of “consented” and “available” infrastructure will become available;
- Appendix D has been amended to include the following details, in relation to local authority waste authorised facilities -
 - Type -(WFP/CoR)
 - Class of Activity Code
 - Class of Activity Description
 - Allocated Group (as per the waste plan)
 - Total Authorised Treatment Capacity (tonnes/year)
 - Total Waste Intake for 2012
- Details of the current active local authority authorised waste facilities will be uploaded on www.southernwasteregion.ie following publication of the plan;
- Appendix E has been amended similarly to Appendix D, to include more detail on EPA authorised facilities;
- Policy Action A.4.1 states that a capacity database shall be established, maintained and published;

Recommended amendment(s) to Draft Plan:

- Refer to details in Section 4.2.6.2 – 4.2.6.11 regarding changes to the specific infrastructure policies.

Waste Infrastructure

- A submission stated that “thermal treatment” as implied in the draft plan refers to WtE (incineration);
- Plan needs to consider and provide for smaller scale local treatment infrastructure in order to comply with the proximity principle and encourage the development of local jobs;
- The proximity principle and centrality must be observed to ensure a minimal carbon footprint;
- The plan should emphasize the requirements for adequate waste management infrastructure for operators of tourism infrastructure and owners of holiday homes (2 submissions);
- The plan should include a policy in relation to the siting of Pay-to-Use Units (PTUs) and also provide a timeframe for revision of existing CoR for PTUs in relation to new household regulations;
- The development of all island capacity for hazardous waste should be considered;
- The plan should strictly limit clothing bins with consideration given to a total ban on street collection bins except in CAS or authorised sites;
- Plan should address the inadequate provision for green waste collections.

Our Response:

- “Waste to Energy Plant (Thermal Treatment)” has been removed from the “List of Terms” in the plan. References to thermal treatment in the draft plan have been amended to state “thermal recovery” and this definition includes all current thermal recovery technologies including gasification, pyrolysis and incineration with energy recovery;
- Policy E19 supports the development of indigenous reprocessing and recycling capacity where practicable;
- Policy G3 states *“Ensure there is a consistent approach to the protection of the environment and communities through the authorisation of locations for the treatment of wastes”*;
- Section 6.8.4 has been amended to include details of the impact of tourism on waste infrastructure;
- Issues in relation to PTUs will be addressed nationally via the proposed Waste Management (Collection Permit) Regulations, 2015;
- The 3 waste plans only cover the local authorities within the Republic of Ireland hence the development of all island capacity for hazardous waste is outside the remit of these plans, however the issue will be brought to the attention of the NCCWMP;
- As clothes collected in clothes bins are going for direct reuse they are not considered to be a waste hence they are outside the remit of this plan, however the issues raised will be brought to the attention of the NCCWMP;
- Almost all CAS within the region accept green waste;

Recommended amendment(s) to Draft Plan:

- Refer to details in Section 4.2.6.2 – 4.2.6.11 regarding changes to the specific infrastructure policies

4.2.6.2 Pre-Treatment Infrastructure Policies (Policies E1 & E2)

10 comments were received in relation to the pre-treatment infrastructure policies. Two of these were not supportive of the statement that there was a significant quantity of pre-treatment available in this region, other issues raised included:

- Concern that the policies would result in ‘ownership’ of the market (2 submissions);
- Concern that *“local authorities, and the other authorising agencies, may in effect be given a role as market-regulators if the policies as proposed are adopted”*; and
- *“Policy fails to recognise that inadequate provision of waste management infrastructure can lead to waste being left on the streets.*

Our Response:

- The objective of policies E1 and E2 is to ensure bodies granting pre-treatment authorisation take into account the authorised and available capacity in the market. The operator must demonstrate that the treatment is necessary and the proposed activities will improve the quality and add value to the output materials generated at the site. This should ensure that only appropriate required pre-treatment facilities are authorised whether this is at existing or new facilities – policies E1 and E2 have been reworded to provide further clarity. Note: the following has been removed from policies E1 and E2 “*there is a significant quantity of unused pre-treatment capacity in the region*” – refer to rewording below;
- Policy E2 has been linked to policy E1 – refer to rewording below;
- The last part of Policy E.2 has been reworded, see below; and
- Local authorities, and the other authorising agencies, have responsibility to ensure only appropriate required pre-treatment facilities are authorised.

Recommended amendment(s) to Policies E1 and E2:

Policies E1 and E2 have been reworded as highlighted:

- **E1** - *Future authorisations by the local authorities, the EPA and An Bord Pleanála of **pre-treatment capacity in the region** must take account of the authorised **and available capacity** in the market **while being satisfied the type of processing activity being proposed meets the requirements of policy E2.***
- **E2** - *The future authorisation of pre-treatment activities by local authorities over the plan period will be contingent on the operator demonstrating that the treatment is necessary and the proposed activities **will improve the quality and add value** to the output materials generated at the site.*

4.2.6.3 Public Civic Amenities and Bring Centres (Policies E3 – E7)

In relation to the public CAS and bring centres policies the following comments were received:

- Almost all submissions received were in relation to **Policy E3** and the issues raised included the need for additional and expanded CAS and bring centres;
- **Policy E5** – a submission received stated that this policy should be expanded to state if local authorities cannot commit to having a permanent collection of hazardous waste at CAS then the collection system should be available once per annum; and
- **Policy E7** – a submission received stated that this policy should be expanded to state that the region and local authorities would be supportive of a national scheme.

Our Response:

- Due to local authority budget restrictions the development of new CAS and bring centres over the life time of the plan may be limited, hence the provision of these facilities by the private sector is supported. Policy E3 has been split into E3A and E3B in order to strengthen the plan's support of the role of local authority and private sector in providing bring infrastructure within the region – refer to specific wording below;
- **Policy E5** – Due to the cost involved in collecting hazardous waste it is not possible to commit at policy level to having an annual collection system available at all CAS;
- **Policy E6** – The following amendments were made:
 - The term “*may require*” replaced “*will require*” as some Class 10 facilities may not be suitable for bring facilities.
 - The term “*waste facility permit*” was included to ensure the policy is self explanatory.
 - The term “*hazardous*” was removed in accordance with the 2007 Regulations.

Recommended amendment(s) to Policies E3 – E7:

Policies E3 – E7 have been reworded as follows:

- **E3A** – Original E3 policy;
- **E3B** is a new policy and states- “*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 siting criteria*”;
- **E4** – No change proposed;
- **E5** – No change proposed;
- **E6** – as detailed above; and
- **E7** – No change proposed.

4.2.6.4 Disposal (Policies E8 – E12)

In relation to the disposal policies the following comments were received:

- **Policy E9** - statement seems to be over-shadowed by statements within the draft plan regarding data-gaps and a general lack of key information;
- The plan needs to allow for the disposal of non-hazardous and hazardous industrial waste as alternative options are not available for some by-products of industrial processes; and
- **Policy E11** - 2 submissions received stated that the words ‘local authority’ should be removed and the policy should be amended to include private sector landfills.

Our Response:

- An extensive review and analysis of local authority and EPA waste authorisations in the region was undertaken as part of the market analysis. The policies in relation to the need for future facilities took into account waste growth (at the lower predicted rate to take account of prevention), growing recycling rates, future targets, move away from landfill & conversion of pending capacity into active treatment;
- Policy E9 has been divided into Policies E9A and E9B with E9A dealing specifically with municipal residual waste and E9B with industrial waste - refer to rewording below.
- Reference to “local authorities” has been removed from Policy E11 - refer to rewording below.

Recommended amendment(s) to Policies E8 – E11:

Policies E8 – E11 have been reworded as follows:

- **E8** – No change proposed
- **E9A** – The original E9 policy has been reworded as follows–*“The on-going availability of disposal facilities for non-hazardous municipal residual waste in the region will be required during the plan period. The local authorities consider there is no need to provide additional disposal facilities for residual wastes over and above the existing authorised (i.e. operational, inactive or un-commenced) facilities in place”;*
- **E9B** is a new policy and states – *“The waste plan supports the need for on-going disposal capacity to be developed for on-site generated non-hazardous/hazardous industrial waste over the plan period”;*
- **E10** has been amended as **highlighted**– *“The waste plan recognises the need for on-going disposal capacity to be available in response to events which pose a **risk to the environment and/or health of humans & livestock. The local authorities of each region will monitor available contingency capacity annually**”;* and
- **E11** has been amended as **highlighted**– *“The plan supports the consideration of **appropriate alternative** future land uses **at authorised inactive landfills (un-commenced; permanently-closed; or temporarily-closed)** - subject to amendments of existing approvals being put in place. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure protection and preservation of the Natura 2000 Network Potential activities include:*
 - *Waste treatment activities including pre-treatment, thermal recovery, biological treatment, reprocessing or preparing for re-use;*
 - *On-site temporary storage of waste and materials;*
 - *Co-location of utility services such as wind farms or other energy generating activities;*
 - *Development of public and recreational amenities;*
 - *Co-locating recycling / reuse waste enterprises on site;*
 - *Resource mining; and*
 - *Contingency capacity for crisis events **such as risks to the environment and to the health of humans and livestock.***
- **E12** – No change proposed

4.2.6.5 Recovery - Backfilling (Policies E13 & E14)

In relation to the recovery-backfilling policies concern was raised regarding the statement “*there is significant quantity of unused active and pending capacity for backfilling in the region*” particularly as backfilling is often more than just a waste management activity. It is often a requirement of planning permission that quarries be restored after the quarry has expired and there should be full use of these sites. The need for the plans to recognise the issue of C&D fines and its management was also highlighted.

Our Response:

- The market analysis undertaken as part of the plan development indicated a significant quantity of unused active and pending capacity for backfilling in the region. Nevertheless in order to avoid any ambiguity in policy E13 the statement “*There is a significant quantity of unused active and pending capacity for backfilling in the region*” has been removed - refer to rewording below;
- In Policy E14 the word “*remediation*” was replaced by “*restoration*” to take account of backfilling practices at used quarries - refer to rewording below; and
- Chapter 11.2.5 has been amended to include details of C&D fines.

Recommended amendment(s) to Policies E13 and E14:

Policies E13 and E14 have been reworded as highlighted:

- **E13**– “*Future authorisations by the local authorities, the EPA and An Bord Pleanala must take account of the **scale and availability of existing back filling capacity**”;*
- **E14**– “*The local authorities will co-ordinate the future authorisations of backfilling sites in the region to ensure balanced development serves local and regional needs with a preference for large **restoration** sites ahead of smaller scale sites with shorter life spans. All proposed sites for backfilling activities must comply with **environmental protection** criteria set out in the plan”.*

4.2.6.6 Recovery - Thermal Recovery (Policies E15 & E16)

Over 25% of the submissions from various organisations and waste contractors were in relation to the thermal recovery policies detailed in the draft plan, with some submissions supporting thermal recovery and other comments against thermal recovery and in particular incineration.

- 2 submissions received stated that the quantities identified are likely to serve as limits rather than targets and 1 submission received agreed with the proposed needs and supports the policies as detailed in the draft plan;
- 5 submissions received stated they did not want incineration or wanted there to be a move away from incineration when there are better alternatives available to deal with waste;
- 2 submissions stated that there is a need to strengthen the recognition for co-processing in the final plan;
- In relation to **Policy E15** the following specific points were raised:

- 4 submissions received highlighted that if Ireland is to meet the EU circular economy obligations the extra 300,000 tonne incinerator will not be required, particularly if waste exports continue as they have been due to market competition;
- The increased investment in incineration is at odds with the Europe wide commitment to decreasing waste generation, given incineration's reliance on residual waste streams;
- A submission received proposed a "wait and see" approach to identifying specified capacity and timeframes;
- Authorised, but undeveloped or unavailable capacity should not be allowed to block new applications that are clearly needed;
- The plans should commit to a tax on incineration, with or without energy recovery;
- In relation to **Policy E16** a submission received questioned whether thermal treatment is the correct technology for hazardous waste i.e. could solvents be recovered for reuse?

Our Response:

- The policies in relation to the need for future thermal recovery facilities are based on the predicted needs of the residual waste market to 2030 at the time of preparing the waste plan and take into account waste prevention, growing recycling rates and conversion of pending capacity into active treatment. E15a has been reworded to state this – refer to reworded policy below;
- Developments in excess of 300,000 tonnes will only be permitted if the applicant justifies and verifies the need for the capacity, and the authorities are satisfied it complies with national and regional waste policies and does not pose a risk to future recycling targets. E15a has been reworded to state this – refer to reworded policy below;
- E15 has been subdivided into E15a and E15b with E15a dealing with non-hazardous municipal waste and E15b dealing with on-site treatment of industrial process wastes.
- Chapter 4.3 has been amended to strengthen the recognition of co-processing;
- The plan needs to provide direction in relation to thermal recovery therefore a “wait and see” approach is not appropriate; and
- Prevention and reuse of hazardous waste is preferred to thermal recovery and policy H2 deals with this nevertheless there will be a quantity of hazardous waste which will require thermal recovery and policy E16 addresses this.

Recommended amendment(s) to Policies E15 and E16:

Policies E15a, E15b and E16 have been reworded as highlighted:

- **E15a** – *The waste plan supports the development of up to 300,000 tonnes of additional thermal recovery capacity for the treatment of non-hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market and the State’s self sufficiency requirements for the recovery of municipal waste are met. This capacity is a national treatment need and is not specific to the region. **The extent of capacity determined reflects the predicted needs of the residual waste market to 2030 at the time of preparing the waste plan. Authorisations above this threshold will only be granted if the applicant justifies and verifies the need for the capacity, and the authorities are satisfied it complies with national and regional waste policies and does not pose a risk to future recycling targets.** All proposed sites for thermal recovery must comply with the **environmental protection** criteria set out in the plan;*
- **E15b** – *The waste plan supports the need for thermal recovery capacity to be developed specifically for the on-site treatment of industrial process wastes and where justifiable the treatment of such wastes at merchant thermal recovery facilities; and*
- **E16** has been amended as **highlighted** – *“The waste plan supports the development of up to 50,000 tonnes of additional thermal recovery capacity for the treatment of hazardous wastes nationally to ensure that there is adequate active and competitive treatment in the market to facilitate self-sufficiency needs where it is technically, economically and environmentally feasible. The capacity is a national treatment need and is not specific to the **region**. All proposed sites for thermal recovery must comply with the **environmental protection** criteria set out in the plan”.*

4.2.6.7 Recycling – Biological Treatment (Policies E17 & E18)

Seven submissions raised concern regarding imposing an actual maximum ceiling on allowable additional biological treatment with a submission stating that over capacity is “*highly unlikely due to the low incentives available under REFIT*” and “*the export of biowaste to Northern Ireland*”. It was also highlighted that these issues need to be addressed.

Other concerns raised included the need to support local authorities in continuing to improve management and maintenance at compost facilities and the development of new infrastructure for composting as required.

Our Response:

- The plan supports additional biological treatment capacity within the region, therefore policy E17 has been reworded to state “*at least 40,000 tonnes*” – refer to reworded policy below;
- Chapter 4.3 has been amended to include details of the issue of the export of biowaste to Northern Ireland. The relevant regulatory bodies are also examining the issue and it is hoped that it may be addressed through a short term pilot project over the lifetime of the plan (policy action D.3.1);
- The setting of the REFIT rate is the responsibility of the DCENR and therefore outside the remit of this plan, however the issue raised will be brought to the attention of the NCCWMP;
- The plan supports the development of all types of biological treatment – refer to Policy E18, however the development of new local authority compost facilities, over the life time of the plan, may be limited due to local authority funding restrictions;
- Policy E18 has been reworded to state “*including industrial organic waste*” as the plan recognises the use of anaerobic digestion facilities for the treatment of this waste – refer to amended Policy E18 below;

Recommended amendment(s) to Policies E17 and E18:

Policies E17 and E18 have been reworded as **highlighted**:

- **E17**– *The waste plan supports the development of **at least 40,000 tonnes** of additional biological treatment capacity in the region for the treatment of bio-wastes (food waste and green waste) primarily from the region to ensure there is adequate active and competitive treatment in the market. The development of such treatment facilities needs to comply with the relevant **environmental protection** criteria in the plan.*
- **E18**– *The waste plan supports the development of biological treatment capacity in the region in particular anaerobic digestion; to primarily treat suitable agri-wastes and other organic wastes **including industrial organic waste**. The development of such treatment facilities needs to comply with the relevant **environmental protection** criteria in the plan.*

4.2.6.8 Recycling – Material Reprocessing (Policy E19)

In relation to the material reprocessing policy the following comments were received:

- Two submissions received suggested that in addition to plastics, the plan should focus on materials that are not often traded on international markets such as waste wood, glass, compost and recycled aggregate as end-of-waste criteria and alternative outlets for these heavier materials would greatly enhance our recycling performance;
- The development of C & D recycling facilities at suitable sites should be encouraged.

Our Response:

- Policy E19 supports the development of indigenous reprocessing and recycling capacity for the treatment of any type of non-hazardous and hazardous wastes where technically, economically and environmentally practicable.

Recommended amendment(s) to Draft Plan:

- **E19** – No change

4.2.6.9 Preparing for Reuse Activities (Policy E20)

There were no specific submissions in relation to Policy E20 and there are no recommended amendment(s) to the policy as detailed in the draft plan.

4.2.6.10 Facility Authorisations by Local Authorities (Policy E21)

In relation to the authorisation of waste treatment facilities two submissions were of the opinion that the policy statement “...addressing the over-authorisation of facilities..” is a “*dangerous view as an authorisation that is under-utilised or not developed is less of an issue than under-provision of infrastructure due to a lack of authorisations*”. It was also stated that “*The proposal to align authorised and operational capacities has the potential to be a complex process as the assessment of operational capacity requires the consideration of a range of different factors*”.

Our Response:

- The aim of this policy is to address the current inconsistencies across the region in relation to the specification of authorised capacity in local authority waste authorisations. Policy E21 has been reworded to make the policy clearer – refer to amended wording below.

Recommended amendment(s) to Policy E21:

Policy E21 has been reworded as **highlighted**:

- **E21** – *The local authorities will review the approach to authorising waste treatment facilities requiring a waste facility permit or certificate of registration **having regard to the need to achieve consistency of approach between planning approval and operational capacity.***

In relation to **Policy E22** it was stated that *“the wording of this policy suggests that the use of authorised civic amenity facilities and bring centres will only be considered where no such kerbside collection service is available. This would be difficult to implement and could also be viewed as being anti-competitive;”*

Other comments, in relation to E22, included amending the policy to promote civic amenity facilities and bring centres particularly in the case of glass and that consideration should be given to including a recommendation in the final plan that glass be specifically excluded from the MDR bin.

In relation to **Policy E24** a submission received stated that there should be a specified policy to liaise with the Department of Agriculture, Food and the Marine and with current authorised collectors of International Catering Waste (ICW) particularly in relation to the issue of lack of disposal options within the region. It was also recommended that a listing of relevant ICW lander licensees and ICW transporter licensees should be provided in the plan.

Our Response:

- Policy E22 has been split into E22a and E22b with E22a specifically supporting kerbside source segregated collection and E22b specifically supporting authorised civic amenity facilities and bring centres – refer to amended wording below;
- Excluding a specific waste type from the MDR bin can only be implemented through national legislation and the issue raised will be brought to the attention of the NCCWMP;
- Any operator engaged in the generation, handling, transport, processing, storing, or disposing of ICW must be authorised by the Department of Agriculture Food and the Marine therefore the issues raised are outside the remit of the plan, however the issues raised will be brought to the attention of the NCCWMP; and
- Policy E25 was amended to include industry / voluntary schemes similar to PRIs and to ensure the policy was not limited to the waste streams specified - refer to amended wording below.

Recommended amendment(s) to Policies E22 – E25:

Policies E22 – E25 have been reworded as follows:

- **E22a** is amended as **highlighted** - *The plan supports the primacy of kerbside source segregated collection of household **and commercial** waste as the best method to ensure the quality of waste presented;*
- **E22b** is a new policy and states - ***The plan also supports the use of authorised civic amenity facilities and bring centres as part of the integrated collection system;***
- **E23** - No change;
- **E24** - No change;
- **E25** is amended as **highlighted** - *The plan supports the improvement of existing PRIs and the development of new PRIs **or similar industry/voluntary schemes** for specific waste streams including **but not limited to** human and farm chemicals and medicines, paints, newspapers, magazines **and bulky waste.***

4.2.7 Enforcement and Regulation (Objective F)

4.2.7.1 General

As evident from **Figure 3.3**, over 33% of submissions dealt with the enforcement and regulation objective and policies. A number of these submissions recommended including additional policy statements / actions and these included the need for a policy regarding the consistent enforcement of the food waste regulations and roll out of brown bin (8 submissions). The need for key experts on food waste regulation enforcement in each waste region was also highlighted. A requirement that Annual Environmental Reports (AERs) of waste permitted sites are made publicly available on a website, consistent with AERs for licensed sites (2 submissions) was also highlighted.

A number of submissions dealt with the need to improve the consistency of enforcement and a commitment that enforcement staff co-operate together within the region and across the other regions, do joint actions and share information. A number of submissions dealt with more specific actions such as;

- A commitment to increasing the uptake of authorised waste collection services, through enforcement and increased public awareness campaigning;
- A specific policy with regard to facilities that operate under local authority waste authorisation; and
- The need for an action to deal with the decrease in the annual amount of commercial brown bin waste collected.

Our Response:

- Two additional policy actions (F.1.4 and F.2.4) have been inserted in relation to enforcement of the household and commercial food waste regulations;
- The availability of waste permitted facility AERs will be considered as part of the capacity database (Policy Action A.4.1);
- The decrease in the quantity of commercial brown bin waste collected in 2012 corresponds to a similar reduction in the quantity of non-household municipal residual waste from the preceding year;
- The overall strategic objective for enforcement and regulation states *“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”*;
- Increasing the uptake of authorised waste collection services will be addressed via Policy G4 which deals with unmanaged waste; and
- Policy Action F.2.3 has been amended to state local authority waste authorisations.

Recommended amendment(s) to Draft Plan:

- **Policy Action F.1.4** states: *“Allocate resources to monitor the schedule for roll out of brown bins to households in accordance with the European Union (Household food waste and Bio-waste) Regulations, 2013”*;
- **Policy Action F.2.4** states: *“Audit waste arisings from non-household waste premises (commercial and similar premises) to determine compliance with relevant regulations including commercial food waste regulations as reflected in the RMCEI”*;
- **Policy Action F.2.3** states: *“Maintain high level of site inspections of existing **local authority** waste authorisations and ensure that these are reflected in the RMCEI”*

A number of general submissions were made in relation to the enforcement and regulation policies and these included:

- 2 submissions received raised concerns regarding the non-submission of an AER with one submission stating it should be regarded as a serious non-compliance while another stated that revocation of the authorisation should be considered;
- 3 submissions received stated that the plan should investigate the use of surplus edible foods currently discarded as waste.
- 4 submissions received raised concern regarding the clear disparity when it comes to the level of enforcement aimed at permit holders and that directed towards licence holders;
- 2 submissions stated that there must be adequate and sufficient funding for local and regional authorities to monitor and enforce the proper management and treatment of waste to ensure that the waste hierarchy is properly enshrined;
- Concern was raised that there seems to be a greater emphasis on the monitoring of those who are already authorised; and
- It is important that the final plan clearly states ways in which local authorities can increase their competencies and resources in this area.

A number of submissions expressed concerns in relation to the level and consistency of enforcement in a number of areas including:

- auditing of permitted waste facilities;
- unauthorised activities;
- existing legislation;
- illegal dumping and fly tipping;
- households disposing of waste illegally including holiday homes;
- Bye-Laws;
- WEEE/Batteries; and
- PRI Schemes including Repak who wish to financially support enforcement of packaging.

Our Response:

- The non-submission of waste collection permit AERs will be addressed in the forthcoming household waste collection regulations and sanctions will apply to all types of authorised collectors.
- Details of the current initiatives for using surplus edible foods have now been included in the waste prevention chapter (Section 8.3.6);
- The overall strategic objective for enforcement and regulation states *“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”* and relevant issues raised above will be brought to the attention of the NCCWMP;
- Policy Action F.2.3 deals with monitoring local authority waste authorisations;
- Policy F.3 deals specifically with unauthorised waste activities and has 3 associated policy actions;
- Policy G.4 deals specifically with addressing unmanaged household waste;
- A new policy action (F.2.2) has been inserted regarding to working in partnership with compliance schemes – refer to wording below;
- The DECLG are funding local authority enforcement activity; and
- The role of the lead authority / Regional Waste Management office has been amended to include the identification, coordination and facilitation of training needs (Section 17.2.1).

Recommended amendment(s) to Draft Plan:

- Section 8.3.6 has been amended as detailed above;
- The role of the lead authority / Regional Waste Management office, in Chapter 17.2.1, has been amended to state the following – *“Identify, coordinate and facilitate the training needs of the Region to ensure effective implementation of the plan”*;
- **Policy Action F.2.2** states – *“Work in partnership with the compliance schemes and other bodies to address on-going regulatory obligations”*;
- The target for **Policy Action F.3.3** has been amended to state – *“Prevent and address unauthorised activities in the region”*

4.2.7.2 Policies F1 – F4

In relation to the specific policy actions under enforcement and regulation the following issues were raised:

- **Policy Action F.1.1** – It was recommended that a national programme of education and awareness should be a priority;
- **Policy Action F.4.1:**
 - 2 submissions received stated that the waste collection permit (WCP) conditions should reflect the desire to move waste up the hierarchy to reuse;
 - All collectors, commercial or social enterprises should be required to have a WCP; and
 - Local discretionary conditions should allow the NWCPO to ensure that conditions and fees are not prohibitive to social enterprises working in the reuse space.

Our Response:

- The education and awareness of householders is addressed in Policy B (prevention actions);
- WCP conditions are outside the remit of this plan nevertheless Policy Action F.4.1 ensures that the lead authority for waste enforcement and the local authorities within the region work with the NWCPO in relation to the conditions. The issues raised will be brought to the attention of this group; and
- The requirement to have a WCP and setting of the fees for a WCP is the responsibility of the DECLG, however the issue raised will be brought to the attention of the NCCWMP.

Recommended amendment(s) to Draft Plan:

- Refer to details in Section 4.2.7.1 regarding changes to the specific enforcement and regulation policies

4.2.8 Protection Actions (Objective G)

4.2.8.1 Policy G1

There were no specific submissions in relation to Policy G1 and there are no recommended amendment(s) to the policy as detailed in the draft plan.

4.2.8.2 Policy G2

A submission received was concerned that this policy was unlikely to prevent further ECJ investigation particularly with a target of Q1 2021 for the preparation of applications to the EPA for authorisation. Concern was also raised regarding the high percentage (24%) of sites which have yet to undergo any form of risk assessment.

A number of submissions made recommendations in relation to Policy G2 and these included the need for the policy to state “*subject to funding from the DECLG becoming available*”, the need for the risks assessments undertaken to be communicated to the relevant stakeholders, the need to identify the potential for the use of landfill gas. It was also highlighted that the indicator for Policy Action G.2.3 should be changed to the number of applications.

Our Response:

- The remediation of the historic/legacy landfills is subject to funding from the DECLG and the policy and implementable actions in this plan were formulated following communication with the DECLG. As initial starting point the lead authority will rank 100% of class A sites by the end of 2015 (Policy Action G.2.1) with a roadmap prepared by the end of 2016;
- The relevant policy actions state “*subject to Department funding being available*”;
- Relevant stakeholders will be consulted as information regarding risk assessments become available;
- The potential for landfill gas will be examined on a case-by-case basis as part of the remediation of the sites;
- The indicator for Policy Action G.2.3 has been amended – refer to rewording below; and
- Current regulations require only sites in operation between 1977 and 1997 to be risk assessed.

Recommended amendment(s) to Draft Plan:

- The indicator for Policy Action G.2.3 has been amended to state “*number of applications submitted*”.

4.2.8.3 Policy G3

In relation to the environmental protection criteria (Policy Action G.3.1) it was highlighted that the plan should provide comprehensive spatial guidance and criteria for waste recovery and waste facilities in the region in order to ensure that each local authority in the region would have a common and consistent plan-led approach to the location of waste management facilities. Three submissions received dealt with the need to consider the location of airports in the siting of waste facilities.

Our Response:

- The expected timeline for Policy Action G.3.1 states *“Siting guidelines to be prepared in 2015 and all documents reviewed every 2 years”*. The issues raised above will be considered as part of the preparation of these guidelines;
- The recently published Climate Action and Low Carbon Development Bill 2015, if enacted, will require specific adaption measures in relation to the waste sector including possible adaption measures for facilities located in flood risk areas and / or sea level rises, therefore a new Policy Action (G.3.2) has been inserted to address this requirement– refer to wording below; and
- The environmental protection criteria (Chapter 16.5) considerations have been updated in relation to airports - refer to wording below.

Recommended amendment(s) to Draft Plan:

- Policy Action G.3.2 has been inserted as follows:
 - Policy action – *“Undertake a risk assessment of all waste disposal sites in coastal and estuarine areas to identify those at risk from coastal erosion in the short, medium and long term.”*
 - Targets – *“To ensure climate proofing measures are implemented at sites identified as being of high risk to prevent impacts on the environment.”*
 - Expected Timeline – *“Lifetime of the plan.”*
- Chapter 16.5 has been amended to state *“if there is an airport within 13 km of the proposed waste facility, the airport shall be consulted at an early stage of planning”*.

4.2.8.4 Policy G4

In relation to addressing unmanaged waste the following was stated:

- The reported figures appear to inadequately reflect the waste brought to civic amenity sites (CAS);
- Unmanaged household waste should be subject to a year on year target reduction;
- The plan should include specific policy to work closely with the CSO and their quarterly national household survey;
- Household waste collectors must not be allowed to cherry pick large population centres to the detriment of servicing the dispersed households in rural areas; and
- In relation to addressing the issue it was suggested that;
 - Statutory declarations be used initially in order to identify where householders dispose of their waste; and
 - A county based enforcement team be used along with appropriate education and awareness initiatives.

Our Response:

- The figures reported in the plan take into account waste collected from all different sources, including the CAS;
- Accurately measuring unmanaged waste is difficult due to a number of variables. Nevertheless the headline target *“1% reduction per annum in the quantity of household waste generated per capita over the period of the plan”* will take account of a reduction in unmanaged waste;
- As part of future calculations of “unmanaged waste” the findings of the CSO quarterly household survey will be examined and details used where appropriate;
- The current collection regime, i.e. open market competition, does not allow the DECLG or local authorities to specify particular collection routes;
- All methods of surveying and identifying issues in areas of low collection coverage will be examined as part of the implementation of Policy G4.

Recommended amendment(s) to Draft Plan:

- The expected timeline for implementing Policy Action G.4.1 has been changed to the end of 2016 to coincide with the implementation of the forthcoming household regulations;
- Policy Action G.4.2 has been amended as follows: *“Design and implement a programme to regulate, enforce and communicate in areas with low collection coverage, **including the negative health and environmental impacts of burning/illegal dumping**”* and
- The indicator for Policy Action G.4.3 has been amended to remove *“tonnage of waste collected from public drop off points”* as *“public drop off areas”* as a specific design solution has been removed from the policy action.

4.2.8.5 Policy G5 (Additional Policy)

A submission received suggested that the plan should contain *“it would give clarity to the context and requirements of the assessments undertaken if specific reference to the relevant legislation governing the screening for appropriate assessment and appropriate assessment for the various plan components (planning, waste licensing, etc.)”*.

Our Response:

- An additional policy (G5) and associated policy action (G.5.1) have been inserted to address the above issue – refer to wording below.

Recommended amendment(s) to Draft Plan:

- Policy G5 – *“Ensure that the implementation of the regional waste management plan does not prevent achievement of the conservation objectives of sites afforded protection under the EU Habitats and Birds Directive.”*;
- Policy Action G.5.1 has been inserted as follows:
 - Policy action– *“As part of the statutory review process under the relevant waste regulations, the local authorities will examine relevant waste authorisations requiring local authority consent to determine if AA screening is required. In addition, the local authorities will prioritise reviews of waste authorisations and requirements for AA screening, in advance of any scheduled review, based on the proximity to or potential pathway of the permit holder to European Sites.”*
 - Targets – *“To ensure relevant existing development consents relating to waste activities and infrastructure have been screened for AA and ensure NIS is provided by the applicant / operator where considered appropriate.”*
 - Expected Timeline – *“Ongoing”*
 - Indicator – *“Number of AA screenings completed”*

4.2.9 Other Waste Streams Actions (Objective H)

In relation to the specific policies and policy actions the following issues were raised:

- **Policy Action H.1.1** - it was suggested that the wording be amended to include a statement that *“sewage sludge is regarded as a resource and that outlets for its reuse should be sustained and developed”*;
- **Policy H.2** (household hazardous waste collections) - 2 submissions received recommended having more collections, establishing new extended PRIs and a more innovative and effective symbiosis programme;
- **Policy Action H.2.2** (reuse schemes)- 2 submissions received suggested that pilot projects be undertaken with CAS;
- **Policy H.3** (setting up of new producer responsibility schemes) -it was suggested that the regional authorities should investigate possible financing mechanisms through the packaging PRI and that any future new or review schemes should better reflect the waste hierarchy and include targets for reuse.

Our Response:

- The aim of the policy actions is to detail the work required to meet the stated strategic objectives and policies. Statements regarding specific waste types are not appropriate here;
- The possibility of reuse at CAS is to be looked at under policy action C.1.2; and
- The issues raised in relation to the establishment of any new producer responsibility schemes are outside the remit of this plan, however the issues raised will be brought to the attention of the NCCWMP.

Recommended amendment(s) to Draft Plan:

- The words *“hazardous and non-hazardous waste streams”* have been included in the **Policy H.2** in order to ensure there is no ambiguity in the policy;
- **Policy Action H.2.2** has been reworded to include pilot reuse schemes and remove references to particular waste streams, thereby making it clearer to the reader. It now states *“Examine the possibility of expanding pilot and existing reuse schemes in place throughout the region”*; and
- The target for **Policy Action H.3.2** has been reworded to include *“farms”*.

4.3 ISSUES RAISED IN RELATION TO SPECIFIC SECTIONS OF THE PLAN

In addition to the specific submissions regarding the headline targets, objectives and associated policies and policy actions, a number of submissions dealt with the various sections of the draft plan. A number of these submissions highlighted typing errors and requested additional clarification in relation to statements published. **Table 4.1** below details the main changes made as a result of the submissions received.

Table 4.1 Details of Main Changes to Sections of the Plan as a Result of Submissions Received.

Section Number	Amendment	Reason for the Amendment
List of terms	Amended to reflect plan content.	Refer to amendment.
Executive Summary	Reworded to summarise the main points of the plan in a clearer format.	Refer to amendment.
3.1	Additional sentence inserted detailing how waste legislation governs reporting.	Refer to amendment.
3.2.3	This section has been reworded to provide further clarity to the reader in relation to the end of waste regulations.	Refer to amendment.
3.2.4	Additional sentence inserted regarding exemptions to waste collection permit requirements	Refer to amendment.
3.6	<ul style="list-style-type: none"> - Heading changed to “LEGISLATION TO PROTECT BIODIVERSITY” - Additional paragraph inserted regarding the Water Framework Directive (WFD) 	<ul style="list-style-type: none"> - The word “wildlife” was replaced with “biodiversity” in the heading in order to encompass details of the WFD. -Details of the WFD are relevant given the register of protected areas and requirements to achieve / maintain good water quality status.
4.3	<ul style="list-style-type: none"> - Heading changed to “RESIDUAL AND BIOWASTE EXPORTS”; - Additional sentence inserted “<i>Exporting of segregated biowaste to Northern Ireland is a trend that has developed more recently. The preferential pricing of energy generated from AD plants in Northern Ireland is helping to grow the industry and keep treatment gate fee costs competitive with facilities south of the border.</i>” - The examples from the 2010 report from the Netherlands and the reference to German WtE facilities have been referenced. 	<p>To take account of the emerging issue of biowaste being exported for treatment.</p> <p>Ensure documents referred to are correctly cross-referenced.</p>
5.2	Two paragraphs were inserted regarding the impact of the waste sector on climate change and the need for balanced and sustainable waste infrastructure.	Acknowledges the impacts of climate change

Section Number	Amendment	Reason for the Amendment
5.5	Amended last line of the table, in this Section, to state “ Reduce and where possible eliminate the use of landfilling of all major waste... ”	Elimination of the use of landfilling for all major waste streams may be difficult.
6.2, 6.4, 6.8 & 6.9	The sections on population, land use, economic activity (tourism) and transport infrastructure (roads) have been amended to include details of their impact on waste management and waste infrastructure.	Refer to amendment.
6.8.1	Additional sentence inserted – “ <i>Many IPPC/IPC/IED companies treat waste that they generate on site as a condition of the EPA IPPC licences.</i> ”	Refer to amendment.
7.1.2	Additional sentence inserted “ <i>It is acknowledged that other wastes are also generated at commercial premises and recorded under other headings and not separately identified as commercial.</i> ”	Need to be clear that this section is referring to commercial waste that is municipal in nature (i.e. similar to households) but acknowledging that other waste streams are also generated by the sector.
7.1.16	<ul style="list-style-type: none"> - Additional paragraph inserted regarding the leachate discharged directly to the sewer systems and its properties. - The statement regarding management of sludges is amended to clarify that stakeholders other than Irish Water also have responsibility for sludges. 	<ul style="list-style-type: none"> - To distinguish between leachate transported off-site and that discharged directly to the sewer network. - Irish Water is responsible for water and wastewater sludges from their plants only.
9 & 9.2.1 & 18.2.4	The number of local authority collectors has reduced to two, namely Kerry County Council (formerly Killarney Town Council) and Kilkenny County Council (formerly Kilkenny Borough Council).	Waterford City and County Council (formerly part of Waterford County Council) ceased collection at the end of January 2015.
9.2.4	Last paragraph reworded to clearly explain why the quantity of organic kerbside household waste collected (per household served) is likely to be an underestimate of the total quantity of household organic waste generated.	Refer to amendment.
9.3.6	<p>Additional sentences inserted:</p> <ul style="list-style-type: none"> - To explain that WEEE includes both hazardous and non-hazardous WEEE and provide examples of hazardous WEEE - To state that the WEEE is collected by the compliance schemes (60-70%) and private waste contractors (30-40%) 	Refer to amendment.

Section Number	Amendment	Reason for the Amendment
10.3	Included the increased export of unprocessed municipal waste for incineration with energy recovery abroad as another reason for the falling rates of disposal.	Refer to amendment.
10.4.1	Format of Table 10-6 amended	Table 10-6 amended to make it clearer that the non-household source segregated kitchen and canteen waste collected is a fraction of non-household segregated organic waste collected.
11.2.5	Additional paragraph insert regarding C&D fines.	Dealing appropriately with C&D fines will be an emerging issue over the life time of the plan.
12	The reference to reuse and preparing for reuse facilities as “recovery infrastructure” has been removed.	Reuse is not a waste management activity
12.1.2	The text has been amended to state that the reference numbers used in Figures 12-3 to 12-6 are linked to Appendix D.	Refer to amendment.
12.2.1	Figure 12-7 has been amended to include waste licensed facility reference numbers as per Appendix E.	Refer to amendment.
13.1	Table 13-2 & 13-3 amended	Table 13-2 – Heading amended to include reference year i.e. 2014. Details in the table amended to reflect status of landfills in 2014. Table 13-3 – total annual waste accepted in landfills in the SR included for 2010 – 2012. Note: The landfill data figures were provided by the EPA in August 2014 and included amended figures from those published in the 2012 NWR.
13.3	Table 13-6 amended	Table 13-6 was amended to present details of the number of historic / legacy landfills in a clearer format. In addition Appendix F was amended to include a Table summarising the number of historic / legacy landfills per local authority area.
14.1.2	The “preparation of the National Waste Report” was removed from the list of enforcement responsibilities of the OCLRR as this is not an enforcement role.	Refer to amendment.
14.1.3	Additional sentence inserted “ <i>The NTFSO work closely with the enforcement staff of the local authorities, particularly when dealing with local issues.</i> ”	Refer to amendment.

Section Number	Amendment	Reason for the Amendment
14.1	Sub-section on the National Waste Collection Permit Office (NWCPO) was deleted.	The NWCPO does not have a specific role in enforcement and regulation and therefore details were deleted.
14.1.4	Sub-section on the role of local authorities (regulatory enforcement) was updated to include details of the proposed Waste Management (Collection Permit) Regulations, 2015 and issuing of fixed penalty notices.	Refer to amendment.
16.1.1	The last column of Table 16-1 has been amended to state <i>“tonnes received 2012 (% of authorised capacity)”</i>	Make table clearer to the reader.
16.1.2	<ul style="list-style-type: none"> - The following sentence has been inserted <i>“However the capacity authorised by the authorities for a facility does not necessarily represent the operational or available capacity on the ground and this apparent gap needs to be taken into account.”</i> - The following sentence has been inserted to explain Table 16-2 <i>“Table 16-2 presents on a group basis the number of facilities and their capacities categorised according to the rate of usage at each site relative to the authorised capacity.”</i> - The columns in Table 16-2 have been amended to state <i>“authorised tonnes”</i> - The temporary closure or delayed openings and the built or available capacity at facilities being lower than the authorisation issued have been included as possible factors for authorised but unused / under-used capacity. 	<ul style="list-style-type: none"> - To acknowledge the difference between ‘consented infrastructure’ and ‘available infrastructure’ - Refer to amendment - Make table clearer to the reader. - Refer to amendment
16.2	Amended to state <i>“The EPA facilities in the region are listed in Appendix E”</i> .	Refer to amendment
16.2.1	Table 16.7 has been amended to include description of D5 and D9. A footnote has been inserted to state <i>“Data from EPA Pollutant Release and Transfer Register report which provides the total quantity of wastes sent off-site from waste licensed facilities”</i> .	Refer to amendment

Section Number	Amendment	Reason for the Amendment
16.4.1	The following sentence has been inserted <i>“the available treatment capacity at pre-treatment facilities may be less than the treatment capacity authorised by the local authorities and the EPA.”</i>	To acknowledge the difference between ‘consented infrastructure’ and ‘available infrastructure’
16.4.5	This section has been amended to include details of the pyrolysis plant in Co. Offaly which was granted an Industrial Emissions Licence (WO282-01) in December 2014.	Refer to amendment
16.4.6	Additional sentence inserted to state <i>“It should be noted that biological treatment of organic fines is a recovery activity.”</i> Footnote 107 has been inserted to recognise the current trend of the export of biowaste to Northern Ireland due to the competitive gate fees offered as a result of the preferential pricing of energy generated.	Refer to amendments
16.5	<ul style="list-style-type: none"> - Heading changed to “ENVIRONMENTAL PROTECTION CRITERIA” - Details of the Climate Action and Low Carbon Development Bill 2015 and the proposed waste sector adaption measures have been included. - A paragraph has been inserted regarding the environmental protection criteria guidance and its role as a starting point to address the potential impact of waste related activities on the environment. - The environmental protection criteria have been divided into (1) general environment and (2) European Sites (SPAs and SACs). Policy G5 was inserted. - Policy G5 was inserted. 	<ul style="list-style-type: none"> - The term “environmental protection criteria” more accurately reflects the role the waste plan has in relation to the consent of waste related activities. - Acknowledges the impacts of climate change and forthcoming legislative requirements. - In preparation of the SEA and Natura Impact Report to accompany this plan, the potential to impact on these European Sites (and the wider environment) was identified. The protection of such sites has been included in the form of environmental protection criteria and Policy G5. - The additional policy G5 is relevant to this section.
17.2.3	A subsection was added regarding local authorities role in waste data management.	Validation and reporting of waste data will be a key role for reporting on implementation of the plans, therefore identification of this key role is paramount.
17.2.6	Amended details regarding the NWCPD.	As details re the NWCPD were removed from Section 14.1, additional details of the office’s role are included.

Section Number	Amendment	Reason for the Amendment
17.2.8	Details of the role of the waste industry were expanded.	Details of the role of the waste industry other than compliance with relevant legislation and provision of waste infrastructure/technology are included.
17.2.10	Policy C5 was inserted	The additional policy C5 is relevant to this section.
18.2.1	The paragraph regarding the future use of landfills in the region has been removed.	The financial projections only take into account landfill operation and aftercare.
18.6	<ul style="list-style-type: none"> - Amended to clarify that no additional regional staff will be required but staff within local authorities may need to be supported to implement policy and actions. - In relation to environmental awareness services their focus will be on relevant campaigns rather than specifically targeting sources of waste. The additional expenditure of €500,000 on non-staff costs is also explained. - Table 18-4 updated to include prevention policy actions. 	<ul style="list-style-type: none"> - To clarify the anomalies in the draft plan. - Prevention policy actions will have financial implications and therefore included.
20.2	“Advisory group” removed and “other relevant stakeholders” added to the list of proposed stakeholders	The advisory group established by the DECLG prior to the publication of the plan may no longer be in place following publication of the plans. Other relevant stakeholders will incorporate groups and/or stakeholders which maybe established over the lifetime of the plan.
Appendix A	Details of the post-draft consultation submissions have been included.	Refer to amendment
Appendix D	<p>The following additional details have been included in the inventory of local authority authorised sites:</p> <ul style="list-style-type: none"> - Type of authorisation; - Class of activity description; - Group (as assigned in the plan); - Total authorised capacity (tonnes); and - 2012 intake (tonnes). 	To provided accessible details to the reader.

Section Number	Amendment	Reason for the Amendment
Appendix E	<p>The following additional details have been included in the inventory of EPA waste licensed sites:</p> <ul style="list-style-type: none">- Local authority area;- Facility operational status;- Principal class of activity;- Total authorised capacity (tonnes);- Waste sent off site 2012 (tonnes); and- Waste undergoing final treatment 2012 (tonnes).	To provided accessible details to the reader.
Appendix F	<p>Amended to include a:</p> <ul style="list-style-type: none">- Table of the total number of historic / legacy landfills per local authority area and the number classified as high, medium and low risk and those not assessed.- List of the historic / legacy landfills that have been risk assessed and the associated site risk classification.	Refer to amendment.
Appendix G	<p>Additional appendix inserted to provide an index of the waste plan policies and infrastructural policy statements. The relevant section number has been included for ease of reference.</p>	To provided accessible details to the reader.

APPENDIX A
CONSULTATION COMPONENTS

APPENDIX A-1: NEWSPAPER NOTICE – 18TH NOVEMBER 2014

PUBLIC NOTICE

WASTE MANAGEMENT ACT, 1996 AND WASTE MANAGEMENT (PLANNING) REGULATIONS, 1997

NOTICE OF INTENTION TO MAKE REGIONAL WASTE PLANS

In accordance with Section 23 (1) 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, of their proposal to make New Regional Waste Management Plans.

In compliance with the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004 as amended in 2011), Strategic Environment Assessments are being carried out on behalf of the Lead Authorities. Environmental Reports have been prepared which assesses, at a strategic level, the likely significant environmental impacts of implementing the New Regional Waste Management Plans ("the Draft Plans").

Appropriate Assessments under Article 6(3) of the Habitats Directive 92/43/EEC have also been undertaken to ascertain if the Draft Plans could significantly impact on any site designated for conservation as part of the Natura 2000 network and Natura Impact Reports have also been prepared.

Copies of the Draft Plans and the associated Environmental Reports and Natura Impact Reports can be downloaded from the websites listed below.

A copy of the Draft Plans may be inspected at the addresses given below during normal working hours and a copy can also be purchased at the same addresses for a fee of €50.

Written submissions / observations in relation to the Draft Plans and the associated Environmental Reports and the Natura Impact Reports may be made to the Lead Authorities concerned, as outlined below and shall be taken into consideration by Lead Authorities before finalising the Draft Plans. The latest date of receipt of representations is 4 p.m. on 30/01/15.

Region	Lead Authority	Contact Address and Email
Connacht-Ulster <u>Local Authorities</u> 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 www.curwmo.ie
Eastern-Midlands <u>Local Authorities</u> Dublin City, DúnLaoghaire/Rathdown, Fingal, Kildare, Laois, Longford, Louth, Meath, Offaly, South Dublin, Wicklow, Westmeath	Dublin City Council	Regional Waste Coordinator Eastern-Midlands Region Waste Management Office, Block 1 Floor 6 Civic Offices, Dublin 8 01 222 2023 Email: emwr@dublincity.ie www.emwr.ie
Southern <u>Local Authorities</u> Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Limerick, Tipperary, Waterford, Wexford	Limerick Tipperary Consortium	Regional Waste Coordinator Southern Region Waste Management Office, Limerick City & County Council, Lissanalta House, Dooradoyle, County Limerick. 061-496596 Email: info@srwmo.ie http://southernwasteregion/

APPENDIX A-2: PRESS RELEASES

Press Release - Wednesday November 19th 2014

Galway hosted National Launch of Draft Southern Region Waste Management Plan - *Do one more thing*

For the purposes of waste management planning, Ireland is now divided into three regions: Southern, Eastern and Midlands, Connacht Ulster. The preparation of new regional waste management plans for the regions has been underway since late 2013 following an evaluation of the previous plans which covered ten regions nationally.

The Southern Waste Region encompasses the local authorities: Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Limerick City & County, Tipperary, Waterford City & County and Wexford.

A lot has happened across the Southern Region since the last plans were published between 2004 and 2006 such as:

- A network of 770 Bottle bank sites were maintained
- A network of 50 Civic Amenity Sites accepting more than 25 categories of waste were maintained;
- A household recovery/recycling rate of 63% was achieved
- A commercial recovery / recycling rate of 61% was achieved
- A reduction in the weight of household waste managed per person in the last 3 years

And nationally:

- A packaging recovery rate of 87% was achieved
- An average of 7.3 kg of WEEE was collected per person from private households

The regional plan provides the framework for waste management for the next six years and sets out a range of policies and actions in order to meet the specified mandatory and performance targets.

Most importantly the plan seeks to assist and support the community and local business to develop resource efficiency and waste prevention initiatives. A key plan target is to achieve a 1% reduction per annum in the quantity of household waste generated per capita over the period of the plan. In tandem the plan identifies measures to develop a circular economy where waste management initiatives stop being confined to treating and disposing of waste, instead supporting initiatives that value waste as a resource or potential raw material

A national launch of the 3 draft regional waste management plans took place in Galway City Council offices on the **18th of November at 11:30am**. The launch of the draft plans

coincides with the commencement of a period of public consultation which will continue until the 30th of January 2015.

We want to hear your views on achievements to date and about what more needs to be done. Have your say in the future of waste management by telling us your views. Is there one more thing you can do that will improve Ireland's environment into the future?

More information, a feedback form and the full plan is available on www.southernwasteregion.ie

Following the public consultation stage written submissions will be considered and the final regional waste management plans will be published by the end of March 2015.

In conjunction with the plans, a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) of the impact of the plans has been carried out and the consultation period will also commence for these documents on the 18th of November 2014 and conclude on the 30th of January 2015.

The launch was hosted by Brendan McGrath Chief Executive, Galway City Council and Chair of the CCMA Environment Sub Committee and was attended by the Chief Executives of the three Regional Lead Authorities: Limerick City and County Council/Tipperary County Council, Dublin City Council and Mayo County Council.

-ENDS-

Interviewee

Ms Philippa King
Regional Waste Co-ordinator
Southern Waste Region
061 496842/087 9160228

Do your one thing – have your say on the future of waste management planning

For the purposes of waste management planning, Ireland is now divided into three regions: Southern, Eastern and Midlands, Connacht Ulster. The preparation of new regional waste management plans for the regions has been underway since late 2013 following an evaluation of the previous plans which covered ten regions nationally.

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-ENDS-

Interviewee

Ms Pauline McDonogh
Regional Waste Prevention Co-ordinator
Southern Waste Region
061 496844/0872755538

APPENDIX A-3: INFORMATION LEAFLET –“WE WANT YOUR INPUT - ON ONE MORE THING..”

FREEPOST
Southern Region Waste Management Office
Lissanalla House
Dooradoyle Road
Limerick
LK53



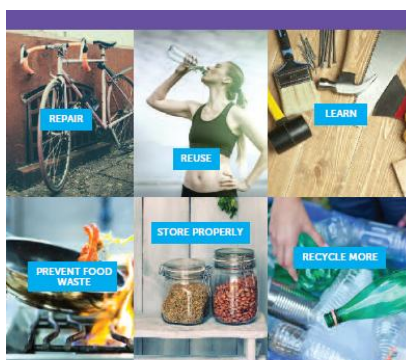
Southern Region Waste Management Office
Lissanalla House,
Dooradoyle,
Co. Limerick.

Tel: 061 496 596
E-mail: info@srwmo.ie
@preventwaste

www.southernwasteregion.ie



**WE WANT
YOUR INPUT
ON ONE
MORE THING ...**



WHAT HAS HAPPENED SINCE 2004 ACROSS THE SOUTHERN REGION

- Provision of 770 Bring Banks
- Provision of 50 Civic Amenity Sites (CAS) across the region accepting more than 25 categories of waste
- 455,000 tonnes of waste collected annually from households
- A household recovery/recycling rate of 63% was achieved
- A commercial recovery/recycling rate of 61% was achieved
- A reduction in the weight of household waste managed per person in the last 3 years

NATIONALLY

- An average of 7.5kgs of waste electrical equipment was collected per inhabitant in 2012
- A national packaging recovery rate of 87% was achieved

SOUTHERN REGION WASTE MANAGEMENT PLAN 2015-2021

As part of the reform of local government the number of waste management planning regions in Ireland has been reduced from 10 to 3.

The following local authorities make up the Southern Waste Region: Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Limerick, Tipperary, Waterford & Wexford.

A draft plan for the management of waste in the Southern Region for the next 5 years is currently available for public consultation. This draft plan outlines what has been achieved since 2004 and what needs to be done between now and 2021.

What we do with our waste will become increasingly more important. As natural resources deplete we will have to reuse, repair and recycle more. The draft waste management plan for the Southern Region aims to move our management of waste from a linear disposal model to a circular economy model so that waste becomes a future resource or raw material.

www.southernwasteregion.ie

WHAT HAPPENS NEXT?

WELL WE COULD ALL TRY TO **DO 1 MORE THING** SUCH AS:

- **PREVENT OR REDUCE HOUSEHOLD WASTE** - Plan Target - 1% reduction per annum in the quantity of household waste generated per capita by 2021
- **SEND LESS WASTE TO LANDFILL** - Plan Target - eliminate the direct disposal of unprocessed residual waste to landfill from 2016
- **RECYCLE MORE** - Plan Target - Achieve a recycling/preparing for reuse rate of 50% by 2020
- **LEARN MORE ABOUT RECYCLING** - Awareness and information campaigns for households & businesses to improve the quality of recycling so less recyclable waste is contaminated
- **LEARN MORE ABOUT PREVENTING FOOD WASTE** - Awareness & information campaigns for householders & businesses on preventing food waste and saving money
- **LEARN MORE ABOUT REUSE & REPAIR** Awareness & information campaigns on repair & reuse
- **SUPPORT** for the community & local businesses & organisations to prevent waste & develop a local circular economy



Your feedback is important to this review process and we look forward to hearing from you.

Please send your views by 4pm on the 30/01/15

FREEPOST
Southern Region Waste Management Office
Lissanalla House,
Dooradoyle,
Co. Limerick, LK53

Tel: 061 496 596
E-mail: info@srwmo.ie
@preventwaste

www.southernwasteregion.ie

TELL US YOUR VIEWS:

WE WANT TO HEAR FROM YOU ABOUT THE CHALLENGES AND OPPORTUNITIES YOU SEE IN WASTE MANAGEMENT.

CAN YOU DO 1 MORE THING?

NAME: _____ TEL: _____

ADDRESS: _____

All entries received will be in with a chance to win one of 10 restaurant vouchers worth €100 each. Full details available at www.southernwasteregion.ie

APPENDIX B
SUBMISSIONS RECEIVED

Table B.1: Post-Draft Consultation - Members of the Public who Forwarded Submissions

Name	Local Authority Area
Ann Boland	Kilkenny
Anna M. Treacy	Kilkenny
Breda Reilly	Kilkenny
Brian Gallagher	Tipperary
Chrissie Walsh	Kilkenny
Cormac McCarthy	Clare
Dearbhla Ni Loughlin	Wexford
Eilish Foley-Flahive	Kerry
Elaine O'Connell	Clare
Eliz Brennan	Kilkenny
Enid E. Abbott	Kilkenny
Evelyn Leigh	Kilkenny
Fiona Walshe	Kerry
Gavin A. Falk	Cork
Hilary Wakeman	Cork
James O'Donovan	Cork
John Williams	Tipperary
Margaret McGrath	Kilkenny
Mary Morrissey	Kilkenny
Michael Gallagher	Waterford
Michael O'Sullivan	Kerry
Patrick Slevin	Waterford
Peter O'Connor	Waterford
Russell Donovan	Clare
Terry Casey	Tipperary
Tom & Dora Campbell	Kerry
Tom Kelly	Limerick
Nicki French Davis	Cork

Table B.2: Post-Draft Consultation - Representative Organisations who Forwarded Submissions

Representative Organisation	Address	Local Authority Area
Cement Manufacture Ireland (CMI)	Ibec, Confederation House, 84/86 Lower Baggot Street, Dublin 2.	Dublin
Chartered Institution of Wastes Management (CIWM)	Castleview, Macroom, Co.Cork.	Cork
Community Reuse Network		Dublin
Cre	Po Box 135, Enfield, Co. Meath.	Meath
Environmental Pillar	Knockvicar, Boyle, Co.Roscommon	Roscommon
Ibec	84/86 Lower Baggot Street, Dublin 2.	Dublin
Irish Farmers' Association (IFA)	Irish Farm Centre, Bluebell, Dublin 12	Dublin
Irish Charity Shops Association	Rathfarnham, Dublin 16.	Dublin
Irish Concrete Federation	8 Newlands Business Park Naas Road, Clondalkin, Dublin 22	Dublin
Irish Motor Vehicle Recyclers Association (IMVRA)	14 Allendale Avenue, Melbourn, Bishopstown, Co.Cork.	Cork
Irish Waste Management Association (IWMA)	7 Dundrum Business Park, Windy Arbour, Dublin 14.	Dublin
Soil Recovery Association	Naas, Co. Kildare	Kildare

Table B.3: Post-Draft Consultation - Waste Industry who Forwarded submissions.

Waste Industry	Address	Local Authority Area
AGB Landfill Holdings Ltd.	Suite 3, One Earlsfort Centre Lower, Hatch Street, Dublin 2	Dublin
Bord na Móna plc	Main Street, Newbridge, Co. Kildare	Offaly
Clean Ireland Recycling	Smithstown Ind. Est., Shannon, Co. Clare	Clare
Country Clean Recycling	Ballygown, Mallow, Co. Cork	Cork
Dublin Waste to Energy (DWtE) Ltd.	Arthur Cox Building, Earlsfort Terrace, Dublin 2	Dublin
GreenGas AD plant	Dunmoylan, Shanagolden, Co. Limerick	Limerick
Greenstar	Unit 6 Ballyogan Business Park, Ballyogan Road, Sandyford, Dublin 18	Dublin
Indaver Ireland	4th Floor Block 1 West Pier Business Campus Old Dunleary Road Dun Laoghaire Co. Dublin	Dublin
KWD Recycling	Killarney, co. Kerry	Kerry
Rehab Group	Roslyn Park, Sandymount, Dublin 4	Dublin
Stream BioEnergy	Carraig House, Brookfield Terrace, Blackrock, Co Dublin	Dublin

Table B.4: Post-Draft Consultation – Local Authorities who Forwarded submissions.

Local Authority	Address	Local Authority Area
Carlow County Council	County Buildings, Athy Road, Carlow	Carlow
Clare County Council	Planning and Enterprise Development Section, Ennis, Co. Clare	Clare
Clare County Council	Environment and Transportation SPC, Ennis, Co. Clare	Clare
Cork City Council	Environment and Recreation Directorate, City Hall, Cork	Cork City
Cork County Council	Environment Directorate, Inniscarra, Co. Cork	Cork
Kerry County Council	Quality of Life /Sustainable Communities Directorate, Tralee, co. Kerry	Kerry
Kilkenny County Council	Environment Protection, Water Services and Energy SPC, County Hall, Kilkenny	Kilkenny
Limerick City & County Council (EAO)	Dooradoyle, Co. Limerick	Limerick
Limerick City & County Council (Waste Enforcement)	Dooradoyle, Co. Limerick	Limerick
Local Authority Environmental Awareness Officers (EAOs)	EAO representatives from Cork, Limerick, Longford, Monaghan, Wicklow and West Meath County Councils	Refer to address
Local Authority Prevention Network (LAPN)	Submitted on behalf of the network by EAO, Monaghan County Council	N/A

Table B.5: Post-Draft Consultation – Action Groups who Forwarded submissions.

Action Group	Address	Local Authority Area
CHASE (Cork Harbour Alliance for a Safe Environment)	West End Terrace , Cobh, Co. Cork	Cork
CHASE (Monkstown & Glenbrook branch)	Glenville, Monkstown, Co. Cork	Cork
Cobh Action for Clean Air	Cobh, Co. Cork	Cork
Cork Environmental Forum	Kilcolman, Enniskeane, Co.Cork	Cork
Kinsale Environment Watch	The Grove, Compass Hill, Kinsale, Co. Cork	Cork
VOICE	9 Upper Mount Street, Dublin 2	Dublin

Table B.6: Post-Draft Consultation – State Organisations who Forwarded submissions.

State Organisation	Address	Local Authority Area
An Taisce	The Tailors' Hall, Back Lane, Dublin 8	Dublin
Department of Communications, Energy and Natural Resources (DCENR)	Geological Survey of Ireland, Beggars Bush, Haddington Road, Dublin 4	Dublin
Department of the Environment, Community and Local Government (DECLG)	Newtown Road, Wexford	Wexford
Department of Arts, Heritage and the Gaeltacht	Newtown Road, Wexford	Wexford
Department of the Environment Northern Ireland	Klondyke Building, Cormac Avenue, Gasworks Business Park, Belfast BT7 2JA	Belfast
Environmental Protection Agency (EPA)	Richview, Clonskeagh Road, Dublin 14	Dublin

Table B.7: Post-Draft Consultation –Councillors who Forwarded submissions.

Councillor	Address	Local Authority Area
Cllr. David Doran	Garranroe, Thurles, Co. Tipperary	Tipperary
Cllr. David Dunne	Carrick-on-Suir, Co. Tipperary	Tipperary
Cllr. Johnny Flynn	Verdant Hill, Tulla Road, Ennis, Co. Clare	Clare
Cllr. Tom Woods	27 Main Street, Cashel, Co. Tipperary	Tipperary
Cllr. Marcia Dalton	Passage West, Co. Cork	Cork

Table B.8: Post-Draft Consultation – Consultants who Forwarded submissions.

Consultant	Address	Local Authority Area
Clean Technology Centre	Cork Institute of Technology, Melbourn Building, 53 Melbourn Road, Cork	Cork
David Brosnan, Project Consultant (Waste-to-Power)	Limerick Business Complex, Raheen Business Park, Raheen, Co. Limerick.	Limerick
Dr Duncan Laurence, Duncan Laurence Environmental Ltd	Coolnagee, Forth Mountain, Wexford	Wexford
VESI Environmental Ltd.	Crough, Dunhill, Waterford	Waterford

Table B.9: Post-Draft Consultation – Businesses who Forwarded submissions.

Business	Address	Local Authority Area
Kerry Airport plc	Farranfore, Killarney, Co. Kerry	Kerry
Kerry Ingredients	Tralee Road, Listowel, Co. Kerry	Kerry
Glenribbeen Eco Lodge	Glenribbeen, Lismore, Co. Waterford	Waterford

Table B.10: Post-Draft Consultation –Other submissions.

Category	Name	Address	Local Authority Area
Academic	St Johns Girl's National School (6th class)	Carrigaline, Co. Cork	Cork
Academic	Technology Centre for Biorefining and Bioenergy (TCBB)	Orbsen Building, National University of Ireland, Galway	Galway
Compliance scheme	Repak	Red Cow Interchange Estate, 1 Ballymount Rd, Clondalkin, Dublin 22	Dublin
Compliance scheme	WEEE Ireland	Whelan House, South County Business Park, Leopardstown, Dublin 18	Dublin
Political party	Green Party	16/17 Suffolk Street, Dublin 2	Dublin
Social Enterprise	Boomerang Recycling	Unit 2B, Ballyvolane Business Park, Cork	Cork
State Org (semi-state)	Gas Networks Ireland	Gasworks Road, Cork	Cork
State Org (semi-state)	Irish Aviation Authority	The Times Building, 11-12 D'Olier Street, Dublin 2	Dublin
State Org (semi-state)	Irish Water	Regional Office, Foley Street, Dublin 1	Dublin