Rialtas Áitiúil Éireann
Local Government Ireland

NATIONAL WASTE MANAGEMENT PLAN
FOR A CIRCULAR ECONOMY 2024-2030

VOLUME III
DELIVERY ROADMAP

REGIONAL WASTE MANAGEMENT PLANNING OFFICES

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Note that a Glossary and a full list of Abbreviations for terms used in this Plan are included in Appendix 1 of Volume IV Supporting Documentation.

PREAMBLE

This is **Volume III** of the National Waste Plan for a Circular Economy 2024-2030 and sets out the requirements from key partners and stakeholders to achieve the ambition, targets, policies and actions presented in **Volume II** together with key deliverables required to enable policies and actions.

This volume reiterates the challenges identified in **Volume I Current Situation & Challenges** in terms of projected waste generation and sets out the potential impact of interventions arising from the implementation of this Plan, the Waste Action Plan for a Circular Economy (WAPCE) and the Circular Economy & Miscellaneous Provisions Act 2022 (Circular Economy Act). These interventions are required to deliver the circular economy measures prescribed in the Climate Action Plan.

To deliver on the ambition of this Plan and its targets and to accelerate the transition to a circular economy, an enhancement of the existing delivery model for policy achievement is required. The existing delivery model depends on the legislative and regulatory push from government for the provision of waste services and initiatives, together with the educational and awareness pull to encourage engagement with waste services and initiatives.

The alternative collaborative model used in the development of this Plan is considered a key factor for the successful delivery of targets, policies and actions and this volume sets out how this engagement with key stakeholders will be maintained.

The evolution of waste plans from local to regional to national requires an organisational response from the local government sector (LGS), both internally and externally, in the way the sector engages with key partners and stakeholders, and this volume sets out a recommended structural response to this challenge.

The current funding model to support the various waste functions of the LGS is complex and the baseline financial position is set out in **Volume I.** Financial support from government is provided at national, regional and local level and these supports extend to capital and operational activities including significant commitments to education, awareness and waste and circular transition campaigns. The LGS underpins waste awareness and enforcement at local level and provides essential waste infrastructure at bring and civic amenity centres. To ensure business continuity in the delivery of local government waste functions, there is a need for ongoing financial support from central and local government.

The human resource engaged in waste activities across the LGS is significant and is set out in **Volume I** and the sector has created shared service arrangements for the effective and efficient delivery of waste planning, enforcement and regulation. The transition to a circular economy will require additional human and financial resources over and above existing commitments and this volume sets out where these additional resources will be required.

The implementation of this Plan will be achieved through the delivery of the policies and actions set out in **Volume II** and the achievement of the key deliverables set out in this volume.

This volume is set out in three parts as follows:

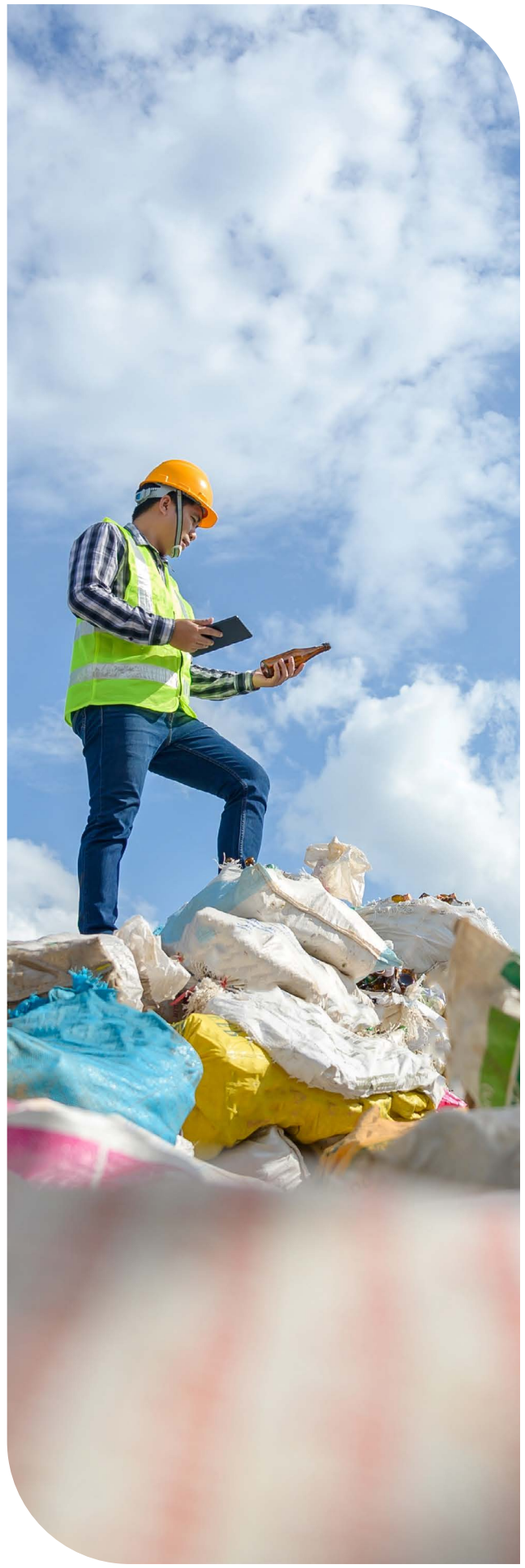
- **Part A – Regulatory, Infrastructure and Climate Impact**
  Part A reiterates the challenge of projected waste generation and the potential impact of the Plan, WAPCE and the Circular Economy Act. Part A also looks at collection and treatment capacity deficits and identifies key deliverables required to address these deficits to enable delivery of the sectors climate commitments. Part A is presented as three chapters as follows with the relevant key deliverables identified throughout:
  - Chapter 1 – Projections and Interventions;
  - Chapter 2 – Capacities and Deficits; and
  - Chapter 3 – Infrastructural Requirements.

- **Part B – Organisation, Engagement and Resources**
  Part B sets out the recommended organisational response of the LGS to the challenges identified in **Volume I** and the associated policies and actions presented in **Volume II.** Part B also sets out the arrangements for continued collaborative engagement with key stakeholders and the potential impact of the Plan on human and financial resources. **Chapter 6** sets out the required level of resources to ensure business continuity as well as the additional resources required to accelerate the transition to a circular economy. This part is presented in three chapters as follows with the relevant key deliverables identified throughout:
  - Chapter 4 – Organisation;
  - Chapter 5 – Engagement; and
  - Chapter 6 – Resources.

- **Part C – Implementation, Monitoring and Oversight**
  Part C sets out the process by which the policies and actions of the Plan will be implemented. Key deliverables include annual work plans and reporting arrangements. Part C also sets out monitoring and oversight arrangements. This part is presented in three chapters as follows with the relevant key deliverables identified throughout:
  - Chapter 7 – Implementation;
  - Chapter 8 – Monitoring; and
  - Chapter 9 – Oversight.

A summary of the key deliverables identified in each of the three parts is presented at the end of each part.

Where relevant, more detailed information to support the data supplied in this volume is included in **Volume IV (Supporting Information).**



PART A:

REGULATORY, INFRASTRUCTURE AND CLIMATE IMPACT

1 PROJECTIONS AND INTERVENTIONS

This chapter provides an overview of projected waste generation and the impact of policy interventions on waste arising. The projected generation rates for MSW and C&D are based on the 'business-as-usual' scenario presented in **Volume I Chapter 6.** Projections have been adjusted to reflect the potential impact of the main legislative and regulatory interventions implemented and proposed for the sector in this Plan, the Waste Action Plan for a Circular Economy (WAPCE) and the Circular Economy Act.

This chapter also identifies key deliverables required to enable interventions to mitigate the growth in waste generation, to increase the national recycling rate and to deliver the circular economy measures in the Climate Action Plan.

1.1 MSW PROJECTIONS AND INTERVENTIONS

The business-as-usual MSW scenario presented in **Volume I** predicts continued growth in MSW generation in the short term to reach up to 3.5 million tonnes by the end of the Plan period in 2030 (a 10% increase from 2020). The analysis did not include for proposed policy interventions designed to prevent MSW generation and the analysis presented in this volume updates the projections taking account of the impact of these policies.

Table 1.1 shows the list of national policy and legislative interventions that have been recently actioned or are proposed during the Plan period and the potential impact of the measures on predicted waste generation rates.

Table 1.1: Impact of Policy Measures on Prevention of MSW

Measure	Assumed Effect
Incentivised Charging for the Commercial Sector (Section 26 of the Circular Economy Act amending Section 34 of the WMA, S.I. No. 104 of 2023)	The implementation of incentivised charging for the commercial sector has the potential for a significant impact on MSW generation rates. Regulations to implement this measure were published in March 2023[1] and have introduced a mandatory segregation and incentivised charging regime for commercial waste which came into effect on the 1st July 2023. This measure should result in the co-benefit of waste prevention and improved segregation, thereby increasing recycling rates, for commercial waste. This analysis conservatively assumes that the measure will result in a 1% reduction in commercial waste generation (on average 17,000 tonnes each year based on projected commercial waste generation in this period) for each year of the Plan period 2024 to 2030.
Levy on Single Use Coffee Cups (Section 11 of the Circular Economy Act)	A 20c levy on disposable coffee cups will be placed on the circa 200 million coffee cups used annually within the State. The EPA 2022 waste characterisation survey[2] reported that composite beverage cups (excluding compostable cups) amount to 7,434 tonnes of commercial waste (circa 0.5% of commercial waste). Assuming a highly successful delivery, such as with the plastic bag levy, this measure is assumed to halve the use of coffee cups and lead to a reduction in commercial waste generation of up to 3,500 tonnes per annum. At the time of publication of this Plan, 2024 the date for implementation is scheduled for 2024 so a partial effect is accounted for 2024 (50% or 1,750 tonnes prevention) and a full 3,500 tonnes per annum prevention for each following years of the Plan period 2025 to 2030.

[1] S.I. No. 104 of 2023 Waste Management (Collection Permit) (Amendment) (No. 2) Regulations 2023

[2] Link: https://www.epa.ie/publications/monitoring--assessment/waste/national-waste-statistics/Waste_Characterisation-Top-Sheet_logo_v2.pdf

Table 1.1: Impact of Policy Measures on Prevention of MSW (contd)

Measure	Assumed Effect
Food Waste Prevention Roadmap 2023-2025 (Section 15 of the Circular Economy Act)	Under the National Food Waste Prevention Roadmap 2023-2025[3] the State has committed to reducing food waste by 50% by 2030 in line with UN SDG's, EU targets and the Climate Action Plan targets. This reduction applies to retail and consumer levels with a wider remit to reduce food losses along production and supply chains, including post-harvest losses. The EPA estimated that Ireland generated 480,400 tonnes[5] of food waste in the base year 2020[4] from the retail and consumer sectors. The EPA report that food waste from the retail and consumer sectors in 2021 was 482,000 tonnes which shows no meaningful change from the 2020 levels. Assuming a 0 tonnes reduction in 2022 rising to a 240,200 tonnes reduction in 2030 (50% of 480,400 tonnes) with a linear reduction over the Plan period, will reduce generation by a cumulative total of circa one million tonnes of food waste in the period 2024 to 2030.
Awareness Campaigns	There are a number of existing awareness campaigns targeted at changing behaviour to prevent waste. This Plan seeks to coordinate messaging to increase awareness further to make meaningful progress in preventing MSW generation in line with Plan Targets. It is conservatively assumed that these measures can deliver a 1% reduction in household waste generation per annum over the Plan period. This equates to an average 17,500 tonnes each year based on projected household waste generation in this period.

Table 1.2: Estimated Reduction in MSW Generation from Policy Measures on Prevention

Country of Destination	Assumed Effect (in tonnes unless specified otherwise)							
	2024	2025	2026	2027	2028	2029	2030	Cumulative Reduction
Incentivised Charging for the Commercial Sector	17,000	17,000	17,000	17,000	17,000	17,000	17,000	**119,000**
Levy on Single Use Coffee Cups	1,750	3,500	3,500	3,500	3,500	3,500	3,500	**22,750**
Food Waste Prevention Roadmap 2023-2025	60,050	90,075	120,100	150,125	180,150	210,175	240,200	**1,050,875**
Awareness Campaigns	17,500	17,500	17,500	17,500	17,500	17,500	17,500	**122,500**
Cumulative Reduction	**96,300**	**128,075**	**158,100**	**188,125**	**218,150**	**248,175**	**278,200**	**1,315,125**
Reduction Relative to Baseline	**3%**	**4%**	**5%**	**5%**	**6%**	**7%**	**8%**	

[3] Link: https://www.gov.ie/en/publication/824c3-national-food-waste-prevention-roadmap-2023-2025/
[4] Link: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/food/
[5] Link: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/food/

Applying the assumed effects of the measures outlined in **Table 1.1** to the business as usual scenario presented in **Volume I Chapter 6,** allows for the estimation of the potential levels of waste prevention that may be delivered by these interventions over the Plan period. These estimated reductions are presented in **Table 1.2** and illustrate a 3% reduction in generation rates in 2024 rising to an 8% reduction in 2030 in line with the progressive reductions under the Food Waste Prevention Roadmap and other interventions.

These estimated reductions have been used to develop a modified MSW generation prediction as shown in **Figure 1.1** (for the CSO high population growth scenario). The projections in **Figure 1.1** show continued annual growth in MSW generation under the business as usual scenario (circa 3.53 million tonnes by 2030) but this growth may be mitigated by the planned interventions (circa 3.25 million tonnes by 2030). The results indicate that there remains a need for significant behaviour change in both the household and commercial sectors to further reduce waste generation and decouple waste generation from economic activity and wealth. This is reflected in Core Policy CP5 of this Plan, which seeks to influence and encourage behavioural improvements in households and business through coordinated multi-agency awareness campaigns.

KEY DELIVERABLE 1

National Food Waste Prevention Roadmap 2023-2025

DECC has committed to reduce food waste by 50% by 2030 from the retail and consumer sectors in line with UN Sustainable Development Goals.

Of the planned interventions in **Table 1.1**, the halving of food waste from the retail and consumer sector offers the greatest potential for MSW waste prevention. DECC has prepared the National Food Waste Prevention Roadmap as a commitment under the Climate Action Plan. This Roadmap sets out the priority actions to prevent food waste across key sectors in the supply chain and the delivery of this Roadmap will be essential to achieve this ambitious prevention target.

KEY DELIVERABLE 2

Implementation of the Incentivised Charging for Non-Household Waste

The LGS will regulate and monitor the implementation of incentivised charging for non-household waste by private waste collectors.

It is generally acknowledged that one of the greatest motivators for wider behaviour change is fully incentivised waste charging, whereby the polluter pays based on the volume of waste generated. Regulations to implement this measure for commercial waste have been published by DECC in March 2023. The LGS is responsible for implementation of the legislation through the regulation (permitting), enforcement and monitoring of the private waste collectors who must apply this charging regime.

KEY DELIVERABLE 3

Continued Waste Prevention Campaigns

The LGS has delivered coordinated national and local waste prevention campaigns on behalf of DECC and will continue to do so with the support of DECC and the EPA.

The analysis in **Table 1.2** assumes a modest 1% reduction in waste generation from the commercial sector but depending on the implementation and financial model applied, the effect of incentivised charging may be more pronounced and more significant reductions may be achieved.

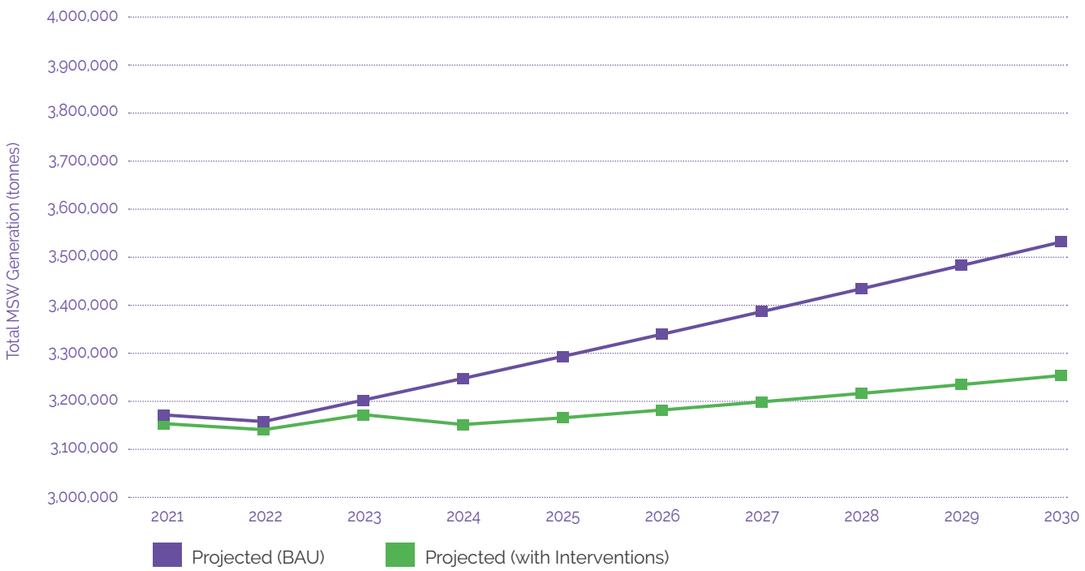


Figure 1.1: Projected MSW Generation – Business as Usual versus Interventions (high population growth)

The WFD set a recycling target of 50% for municipal waste to be achieved by 2020, however, the EPA reports that Ireland has only achieved a recycling rate of 41% in 2020 and this performance was repeated in 2021. The EPA also reports that the State has shown no appreciable increase in the recycling rate over the past decade.

Directive (EU) 2018/851 includes for more ambitious recycling targets in the future as follows:

- **By 2025,** the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 55% by weight;
- **By 2030,** the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 60% by weight; and
- **By 2035,** the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 65% by weight.

From a 2021 baseline of 41% municipal recycling rate, it is unlikely that Ireland will meet these future targets. Significant interventions will be required to meaningfully increase the State's recycling rate to levels approaching these targets.

Like prevention, there are a number of planned interventions that aim to increase the national recycling rate and ensure that higher fractions of resources are made available for circular systems. **Table 1.3** shows the list of policy and legislative interventions that are proposed during the Plan period and the potential impact of the measures on municipal recycling rates if fully implemented.

Note that there is a level of uncertainty in the projected impact for some interventions and in such cases, the impact is presented as a range.

Table 1.3: Measures to increase the MSW Recycling Rate

Measure	Assumed Effect
Incentivised Charging for the Commercial Sector (Section 26 of the Circular Economy Act amending Section 34 of the WMA and S.I. No. 104 of 2023)	In addition to increasing waste prevention, the March 2023 Regulations[6] on incentivised charging for the commercial sector has the potential to promote better source segregation through regulating the 'incorrect separation' of wastes. 1.5 million tonnes of commercial waste was generated in 2019 (1.4 million tonnes both in 2020 and 2021) but there is no data available on the extent of this material that was recycled (other than the 41% recycling rate for total municipal each year). In the absence of a robust dataset, this assessment assumes that commercial waste recycling may increase to a level within the range of 1% to 3% for each year from 2024 to 2030 with the successful implementation of incentivised charging.
Enforcement of the Bye-Laws	Local authorities have introduced bye-laws on the segregation, storage and presentation of municipal waste that apply to all households, apartments and commercial premises. More rigorous enforcement of the bye-laws (Priority Actions PA1.5 and PA2.5) by the LGS will encourage the necessary behaviour change to promote better source segregation. Again, in the absence of a robust quantifier, this analysis assumes a further 0.5-1.0% increase in recycling rates from both household (including apartments) and the commercial sector from 2024 to 2030. The required additional resources to support this enforcement effort are addressed in **Chapter 6.**
Waste Recovery Levy (Section 29 of the Circular Economy Act and S.I. 406 of 2023)	Section 29 of the Circular Economy Act allows for the setting of a chargeable levy related to waste recovery activities or the export of waste for recovery. Regulations to enable this levy were published in August 2023[7] and the levy is specified as €10 per tonne of municipal waste accepted for recovery. The purpose of the levy is to improve the economic rationale for recycling and reuse to be the default first option for dealing with waste. The Report on the Pre-Legislative Scrutiny of the Circular Economy Bill 2021[8], has stated that a €5/tonne levy (as suggested in the WAPCE) 'is unlikely to be enough' to shift the focus from recovery to recycling but no detailed regulatory analysis has been undertaken to quantify the impact. By extension, it is suggested that at the legislated €10/tonne recovery levy, the impact on recycling rates will be minimal in the short term and assumed at 1-3% per annum for the period 2024 to 2030 for this analysis. Should this levy increase significantly, there may be a more meaningful increase in the recycling rate within the lifetime of this Plan.
Landfill Levy (S.I. 298 of 2023)	In 2021 there was 504,305 tonnes of municipal waste sent to landfills for disposal (16% of total MSW). Ireland must comply with an EU target of less than 10% disposal to landfill of municipal waste by 2035 which is also listed as a target under the Climate Action Plan. Regulations[9] have been published in August 2023 to increase the Landfill Levy by €10 per tonne to €85 per tonne from 1st September 2023 to facilitate further diversion from landfill. It is considered that this increase will assist in diverting waste from disposal to recovery but is not expected to result in any significant increase in the recycling rate. The WAPCE also commits to analysing the impact of the Landfill Levy exemption for bio-waste. The removal of this exemption and diversion of this bio-waste stream to recycling operations (such as composting or anaerobic digestion) would increase the recycling rates. The review was ongoing at the time of publication of the Plan.

[6] S.I. No. 104 of 2023 Waste Management (Collection Permit) (Amendment) (No. 2) Regulations 2023
[7] S.I. No. 406 of 2023 Circular Economy (Waste Recovery Levy) Regulations 2023
[8] Link: https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_environment_and_climate_action/reports/2021/2021-12-16_report-on-the-pre-legislative-scrutiny-of-the-circular-economy-bill-2021_en.pdf
[9] S.I. No. 398 of2023 Waste Management (Landfill Levy) (Amendment) Regulations 2023

Table 1.3: Measures to increase the MSW Recycling Rate (contd)

Measure	Assumed Effect
Deposit Return Scheme	The Deposit Return Scheme (DRS) for plastic bottles and aluminium cans was launched in November 2022 and came into effect in February 2024. This scheme is designed to aid in the collection and ultimate recycling of these waste streams. It is estimated that circa 1.9 billion drinks bottles and cans are consumed each year in Ireland (with an estimated mass of circa 30,000-60,000 tonnes assuming 15-30g per can/bottle). An estimated 55% of this stream is currently captured in the recycling bin and the schemes intention is to maximise the quantity of this segregated collection. Forecasts for the scheme suggest that the capture rate will increase to 80% in 2024 (a 15,000 tonnes increase) rising by 2% per annum to reach 90% by 2030 (a 21,000 tonnes increase).
Expansion of the Brown Bin Collection Network	Under the European Union (Household Food Waste and Bio-waste) Regulations 2015, all households living in a population agglomeration >500 people are entitled to a Food Waste Recycling service from their waste collector (this covers circa 67% of the population). This threshold has been removed through legislation in January 2024 to incentivise a wider roll out of the brown bin to communities thereby enabling greater segregation of food wastes. The EPA report that the number of households with brown bins increased by approximately 64,000 in 2020 to 882,249 with a corresponding 40,000 tonnes of food waste collected. With the removal of the threshold, this analysis assumes that at least a further 64,000 households per annum may be provided with (and use) a food waste recycling bin but this may further be accelerated up to 64,000 households per annum. This increased roll out of the three bin system may increase the recycling rates to an estimated level of 40,000 to 80,000 tonnes per annum in line with the most recent trends.

Table 1.4: Estimated Increase in MSW Recycling with existing Measures

Measure	Assumed Effect (in tonnes unless specified otherwise)						
	2024	2025	2026	2027	2028	2029	2030
Low Recycling Scenario							
Incentivised Charging for the Commercial Sector	16,256	16,776	17,111	17,454	17,803	18,159	18,522
Enforcement of the Bye-Laws	16,744	17,085	17,334	17,587	17,842	18,102	18,364
Waste Recovery Levy	33,488	34,171	34,669	35,173	35,685	36,203	36,729
Deposit Return Scheme	15,000	16,000	17,000	18,000	19,000	20,000	21,000
Expansion of the Brown Bin Network	40,000	40,000	40,000	40,000	40,000	40,000	40,000
Cumulative Annual Increase	121,488	124,032	126,114	128,214	130,330	132,464	134,615
Increase Relative to Baseline	**4%**						
High Recycling Scenario							
Incentivised Charging for the Commercial Sector	48,767	50,328	51,334	52,361	53,408	54,476	55,566
Enforcement of the Bye-Laws	33,488	34,171	34,669	35,173	35,685	36,203	36,729
Waste Recovery Levy	100,465	102,512	104,006	105,520	107,054	108,610	110,186
Deposit Return Scheme	15,000	16,000	17,000	18,000	19,000	20,000	21,000
Expansion of the Brown Bin Network	80,000	80,000	80,000	80,000	80,000	80,000	80,000
Cumulative Annual Increase	277,720	283,011	287,009	291,054	295,147	299,289	303,481
Increase Relative to Baseline	**9%**						

Table 1.4 shows the estimated increases in the volumes of MSW recycled over the Plan period based on the implementation of the measures listed in **Table 1.3.** Estimated increases are presented for both a low recycling scenario where the effect of the measures is more modest as well as a high recycling scenario where the effect of the measures is more pronounced.

KEY DELIVERABLE 4

Enforcement of the Bye-Laws

This Plan commits the WERLAs and LAS to more rigorous enforcement of the bye-laws on the segregation, storage and presentation of municipal waste.

For each of the impacts presented in **Table 1.3** and estimated in **Table 1.4,** there is a high degree of uncertainty and the projections are dependent on the timeframe and success of implementation. The combined impact of all interventions may potentially increase the volume of recycled MSW by between 4% and 9% per annum depending on success of implementation. This may potentially increase the recycling rate to a level in the range 45-50% by the end of the Plan period.

NATIONAL RECYCLING RATE:

Depending on the success of the planned interventions, the national recycling rate may be increased by a minimum of 4% and a maximum of 9% with a potential rate of close to 50% by the end of the Plan period in 2030.

KEY DELIVERABLE 5

Implementation of the Recovery Levy to Assist Recycling

The LGS is responsible for the collection and enforcement of the recovery levy which will assist with the diversion of more material for recycling, increasing the recycling rate.

This analysis suggests that with the assumed impact of the above interventions, the State will not reach the national recycling targets for 2025, 2030 and 2035 without further interventions.

The recycling rate may be further supported through targeted behaviour change campaigns but more meaningful intervention may be through an increase in the legislated recovery levy of €10 per tonne.

A key priority for the National Coordinating Group for Waste and the Circular Economy (refer **Section 4.3.3**) will be the identification and implementation of the additional interventions required to bridge the gap between the predicted recycling rates with current interventions and the EU recycling rates for 2025, 2030 and 2035.

KEY DELIVERABLE 6

Brown Bin Collection

The LGS will require authorised waste collectors to implement the food and biowaste regulations.

This predicted growth in recycling levels for both the low (45%) and high (50%) recycling rate scenarios and the impact on rMSW generation rates are presented in **Figure 1.2**.

For the low recycling rate the projections show an increasing recycling fraction along with a stabilisation of the rMSW generation rates up to 2030.

For the high recycling rate, the projections show strong growth in recycling coupled with significant reduction is residual generation with the rates largely equal at the end of the Plan period.

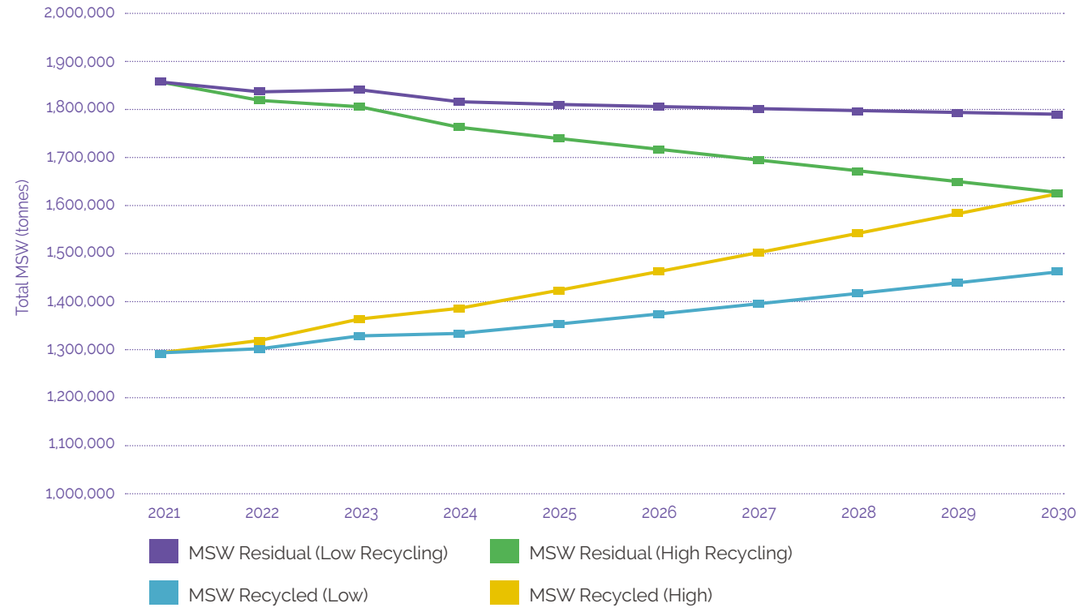


Figure 1.2: Projected Residual MSW Generation and MSW Recycling (high population growth)

MSW:

Projections show continued growth in MSW generation taking account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling. It is imperative that the interventions and key deliverables outlined are implemented effectively and expeditiously to deliver meaningful change in MSW generation, recycling and the ultimate need for rMSW treatment.

1.2 CONSTRUCTION AND DEMOLITION WASTE PROJECTIONS AND INTERVENTIONS

Projections for C&D waste generation presented in **Volume I** indicate significant growth of this material stream in line with the projected increased output of the sector. This material stream has high circular potential and a number of specific interventions will result in significant reductions in future generation rates.

Table 1.5 shows the list of policy and legislative interventions that are recently implemented or proposed during the Plan period and the potential impact of the measures on predicted waste generation rates. There is significant uncertainty around the impact of these measures and much will depend on the timing and nature of these interventions.

Table 1.5: Measures for Prevention of C&D Waste

Measure	Assumed Effect	Impact
National By-Product Criteria for Greenfield Soil and Stone and Site Won Asphalt	The EPA has developed national By-Product criteria for two construction waste streams: • Greenfield Soil & Stone used in developments with planning permission or an exemption from the need for planning permission which provides for the use of this by-product material. A set of Criteria and an Explanatory Note[11] have been published and this decision was implemented in early 2024; and • Site win asphalt for use as a raw material in Reclaimed Asphalt Pavement (RAP) plants for the manufacture of bituminous mixtures[12] which has been notified to the EU and this decision was implemented in in late 2023. These national decisions have the potential to prevent significant quantities of materials becoming waste. In 2021, Ireland generated 9 million tonnes of C&D waste of which 85% was soil and stone (7.6 million tonnes). A further 1% of the 2021 C&D waste generated was bituminous mixtures (87,343 tonnes). In 2021, the EPA received by-product notifications for circa 0.5 million tonnes of soil and stone material but pre-Covid-19 by-product notifications for circa 3 million tonnes of soil and stone were received in 2018 and 2019. These earlier pre-Covid figures are considered more representative of the demand for such decisions in a growing construction sector. This data suggests that circa 10 million tonnes of soil and stone is generated annually with only a quarter of this material declared as by-product. Assuming that there remains a need for by-product declarations and a significant uptake in the national decision process, it is assumed that up to 50% of the greenfield soil and stone generated could be prevented from entering the waste stream through Regulation 27. A total of 5 million tonnes of soil & stone by-product is assumed from 2024 rising by 10% per annum over the Plan period to 2030. Similarly, site win asphalt may be reused as by-product reducing the 1% (87,343 tonnes) of bituminous mixtures wastes generated from 2024 to 2030 but this reduction is marginal compared to the potential for soil and stone.	**-30%/annum** **Reduction of circa 17 million tonnes of soil/stone waste 2024-2030** (2.8 million tonnes per annum, avg. by treating this material as by-product)

[11] Link: https://www.epa.ie/publications/licensing--permitting/waste/draft-national-by-product-criteria-greenfield-soil-and-stone-.php

[12] Consultation Paper Regulation 27(7) National By-Product Criteria for Road Planings used in RAP Plants. Link: https://www.epa.ie/publications/licensing--permitting/waste/consultation-paper-regulation-277-national-by-product-criteria-for-road-planings-used-in-rap-plants.php Link: https://www.epa.ie/media/epa-2020/licensing-amp-permitting/waste/Proposed-National-By-Product-Criteria-Ref.-No.-BP-N0012023.pdf

[13] Link: https://www.epa.ie/publications/licensing--permitting/waste/-national-end-of-waste-criteria-recycled-aggregates.php

Table 1.5: Measures for Prevention of C&D Waste (Cont'd)

Measure	Assumed Effect	Impact
National Decision on Regulation 28 (Aggregate)	While four private enterprises have single case Regulation 28 decisions for recycled aggregate, the national end-of-waste criteria for recycled aggregates have been developed by the EPA in September 2023[13] and are open for registration. In 2021, circa 608,000 tonnes of waste concrete, bricks and gypsum were generated. Two end-of-waste operators had consent to recycle aggregates into product in 2021 and recycled circa 50,000 tonnes. With a national decision and two further private enterprises it is conservatively assumed that this fraction will continue to be processed and a further 50,000 tonnes processed as EoW annually over the Plan period 2024-2030.	**-0.5%/annum** **Reduction of 300,000 tonnes between 2024-2030** (assumed 50,000 tonnes per annum in addition to the baseline)
Good Practice	Policy TP8.3 seeks to promote and implement the EPA Best Practice Guidelines for the preparation of Resource & Waste Management Plans for Construction & Demolition Projects. Successful implementation of this best practice can aid in the prevention of C&D wastes and a conservative 1% reduction per annum is assumed based on this guidance.	**-1%/annum** **Reduction of 600,000 tonnes between 2024-2030** (on average 100,000 tonnes per annum)

KEY DELIVERABLE 7
National Decisions – Regulation 27

The EPA have published national decisions on Regulation 27 which will unlock the potential for a reduction in significant amounts of waste and increase in circularity rates annually.

Applying the assumed effects of the measures outlined in **Table 1.5** to the business as usual scenario presented in **Volume I Chapter 6,** provides modified estimated C&D generation predictions as shown in **Figure 1.3.**

The data shows some fluctuation in recent years between 2020 to 2022 in light of the impact of Covid-19 followed by a reduction in total C&D generation in 2024 assuming the successful implementation of the national Regulation 27 decision on greenfield soil and stone.

KEY DELIVERABLE 8
National Decision – Regulation 28

The EPA have published a national decision on Regulation 28 to unlock the potential for a reduction in significant amounts of crushed aggregate waste annually.

The total predicted waste generation rate increases from the measured 9 million tonnes in 2021 to circa 10 million tonnes in 2023 before reducing post 2024 with the implementation of the national by-product decision on greenfield soil and stone. In 2024 this is a predicted reduction of circa 2.4 million tonnes from the business as usual prediction for 2024, rising to a reduction of 5 million tonnes by 2030.

This projected reduction consists predominately of greenfield soil and stone diverted as by-product in addition to the other interventions noted in **Table 1.5.**

KEY DELIVERABLE 9
C&D Best Practice Guidelines

The LGS is committed to the roll out and promotion of the EPA best practice guidelines for C&D projects.

The trend shows total C&D waste gradually rising from 2024 to 2030 as the impact of the interventions stabilises and the sector grows from 2024. By 2030 total C&D waste generation is expected to rise to 10 million tonnes which is in line with expected 2023 levels and indicates the need for greater interventions to achieve the ambition for 0% waste growth.

Figure 1.3 also shows the effect of the national decision on soil and stone waste and by-product. In 2021, circa 10 million tonnes of soil and stone was generated with three quarters managed as waste.

It is considered that 50% of soil and stone will be managed as by-product when national decisions are implemented and this fraction will rise by 10% per annum up to 2030.

C&D WASTE:
With strong projected growth in the construction sector in the short to medium term, the generation of construction wastes is predicted to continue to grow over the Plan period. The need for significant intervention in this sector with materials which have a high circular potential is well established. It is imperative that the planned interventions on by-products, end-of waste and best practice are implemented without delay. In particular, the by-product measure has the greatest potential to curb waste generation within the sector if suitably implemented and widely adopted by the sector.

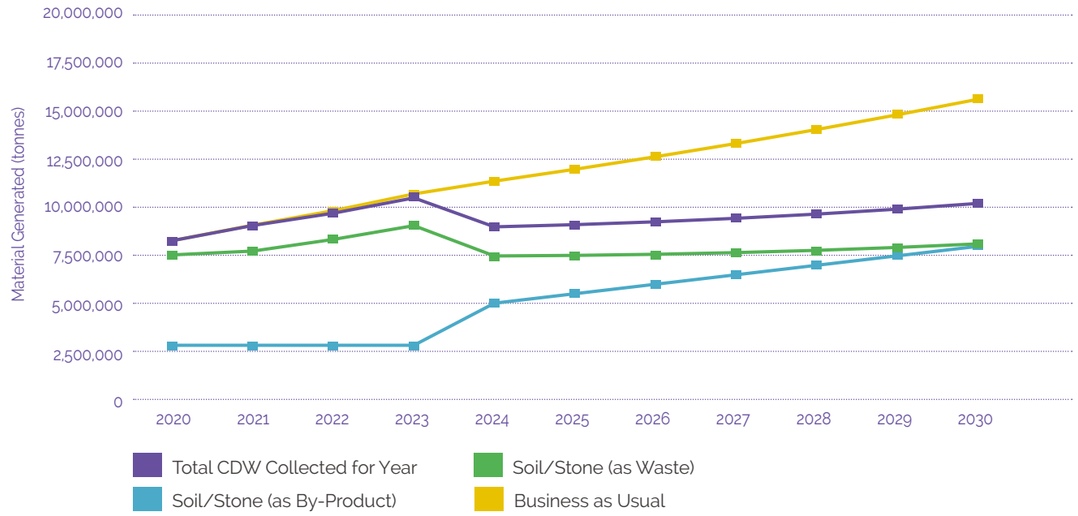


Figure 1.3: Projected C&D and Soil and Stone Generation (with interventions)

1.3 SUMMARY
Population growth and the economic drivers for the commercial and construction sector are predicted to increase the generation of these wastes through the Plan period. The interventions cited in this Plan, the WAPCE and the Circular Economy Act can help mitigate the generation of wastes in line with the ambition for 0% waste growth.

The primary focus on waste prevention and changing behaviours across all sectors (as per Core Policy CP5) will be central to further decoupling waste generation from these drivers. The scope and success of the proposed interventions is difficult to predict given the various dependencies and unknowns at play and the projections should be viewed in this regard. An ongoing monitoring regime is required to track progress and revise projections.

Successful implementation of the incentivised charging regime for commercial municipal waste and the national Regulation 27 decision for greenfield soil and stone are considered the primary drivers and key deliverables to reduce the trend and are supported by this Plan.

Like prevention, there are a number of planned interventions that may increase the national municipal waste recycling rate and ensure that higher fractions of resources are made available for circular systems. The combined impact of all interventions is predicted to result in an increase in the municipal waste recycling rate to up to 45-50% by the end of the Plan period.

The monitoring regime for the Plan (refer **Part C**) will track the delivery and success of the interventions outlined in this area to achieve 0% waste growth per capita over the Plan period consistent with the ambition of this Plan.

This ambition represents the decoupling of waste generation rates from economic activity to mitigate existing and projected trends in waste growth in recent years.

2 CAPACITIES AND DEFICITS

This chapter examines the capacity of the waste market to collect, recycle, recover and dispose of materials and identifies deficits and key deliverables to address the shortfalls. A review of installed and consented treatment capacity is presented to identify the shortfall in available capacity within the State. Shortfalls identified have been addressed in the Targeted Policies for infrastructure (Focus Areas 11 to 16) presented in **Volume II.** Key deliverables are identified where appropriate to address deficits or shortfalls identified in the market.

2.1 WASTE COLLECTION

Volume I Section 5.2 of this Plan describes current collection infrastructure systems within the State including kerbside collection, bring banks, civic amenity sites (CAS), PTUs (Pay-to-Use), take-back schemes and one-off collections.

KEY DELIVERABLE 10
Participation

The LGS is committed to maximum participation in authorised waste services and will promote participation through targeted awareness and enforcement.

In terms of household kerbside collections, national coverage is varied and data indicates that the percentage of households on a kerbside collection system ranges from over 90% in the larger urban areas to just over 50% in rural counties.

Kerbside collections account for two thirds of household waste collections and this Plan supports the primacy of kerbside collection as the optimum method for the capture of segregated household waste.

The continued roll out of the organic bin to all households and commercial operators is essential to maximise the circular potential of this waste stream and reduce the potential contamination and increase material compliance of other bins.

Improved practices are needed among households, mixed use and commercial waste generators on the segregation and presentation of waste for collection. These improvements may be achieved through behaviour change to improve source segregation of waste and through greater enforcement such as through the waste bye-laws. EPA waste characterisation surveys in 2022 showed continued poor segregation practices in both household and commercial bins with high levels of contamination and poor material compliance identified.

KEY DELIVERABLE 11
Material Compliance

The LGS and EPA will establish an enabling group to coordinate the delivery of the plan target on material compliance.

Poor segregation reduces the quality of material available for recycling and the circular potential of this material. Maximising the quantity while maintaining the quality of materials placed in recycling and organic bins is essential to ensure a clean reliable feedstock for circular treatment options.

This core principle is referenced in the ambition of this Plan through 'improving the capture of all wastes optimising circular potential'.

This Plan commits to a material compliance target for recyclable and residual waste bins to achieve minimum standards and reduce contamination with other wastes. The proposed enabling group for this deliverable will be a sub-group of the existing National Waste Data Network with the group co-chaired by the EPA and the LGS.

Section 26 of the Circular Economy Act facilitates the introduction of the regulations[14] for incentivised waste charging regime for commercial operators (legislation already in place for household operators). This measure may result in the co-benefit of greater waste prevention and improved segregation thereby reducing contamination and increasing recycling rates.

KEY DELIVERABLE 12
Reuse Infrastructure

The LGS is committed to facilitating reuse at 10% of existing CAS and at all Top Tier Sites identified by the CA Site review process subject to support from government.

The 'National Review of Civic Amenity Sites' in 2020[15] made a series of recommendations to develop an integrated, consolidated and coordinated public waste infrastructure network that responds sustainably to consumer needs, regulatory and policy challenges and the circular economy. This network of 96 sites within the State provide a local authorised alternative to kerbside collection.

CAS also present the opportunity to provide support to the wider reuse and repair market and simultaneously raise awareness. For this reason, the enhancement of the CAS network to include reuse infrastructure is a commitment under this Plan to facilitate a circular contribution to communities.

A number of legislative and policy instruments have signalled the need for separate collection systems for resource streams such as bio-waste, hazardous household waste and textiles, all of which have been supported within this Plan.

2.2 RESIDUAL MSW WASTE TREATMENT

Volume I Chapter 5 provides an overview of the installed and pending residual MSW (rMSW) treatment capacity within the State. The available and fully consented treatment capacity in 2023 can be summarised as follows:

- **Recovery – Dedicated Thermal Treatment**
  Two waste to energy facilities: 910,000 tonnes (fully utilised);
- **Recovery – Co-Processing**
  Four active cement plants: 482,875 tonnes (typically only 64% capacity or circa 310,000 tonnes employed due to selection requirements for waste type and calorific values but the cement industry has projected that this will increase to 400,000 tonnes of SRF annually by 2030); and
- **Disposal – Landfill**
  Three active MSW landfills: 458,000 tonnes available for MSW treatment.

Current available rMSW treatment capacity in 2023 is circa 1.68 million tonnes based on the capacities outlined and measured utilisation rates. This has increased significantly over the 1.47 million tonnes capacity available in 2022. The projections for rMSW generation shown in Figure 1.2 indicate that there is a current shortfall in treatment capacity of circa 200,000 tonnes in 2023 with the available treatment capacity declining in the period to 2030.

EPA waste statistics for 2021 show that circa 400,000 tonnes of rMSW were exported for final treatment indicating that the shortfall in treatment capacity is being managed through exports. Relying on this level of export is neither sustainable nor complies with the principles of self-sufficiency and proximity and the analysis suggests the need for further treatment capacity within the State.

WASTE COLLECTION:
Increasing the quantity and quality of materials collected through all authorised means has corresponding benefits for both collection compliance levels and the circular potential of materials collected. Key Deliverables that focus on enhancing authorised collection systems are imperative in a transition to a circular economy and in supporting climate action.

[14] S.I. No. 104 of 2023 Waste Management (Collection Permit) (Amendment) (No. 2) Regulations 2023
[15] Link: https://www.mywaste.ie/wp-content/uploads/2021/02/National-Review-of-Civic-Amenity-Sites.pdf

Table 2.1: Expected rMSW treatment capacity changes

Facility	Capacity Change
Glanpower Ltd. (W0282-01)	A 65,000 tonnes rMSW capacity pyrolysis plant in Derryclure, Co. Offaly which has planning and licensing consent but is not fully constructed (assumed capacity may be available by the middle of 2025).
Indaver Ringaskiddy (no licence reference as no application lodged)	A circa 216,000 tonnes rMSW capacity at the waste to energy plant in Ringaskiddy, Co. Cork which has yet to lodge any application for planning or licensing (capacity unlikely to be delivered in the timeframe of this Plan by 2030).
Ballynagran Landfill (W0165-02)	The current planning permission for the landfill at Ballynagran expires in June 2026 after which the 150,000 tonnes rMSW disposal capacity will no longer be available unless a new application is lodged.
Drehid Landfill (W0201-03)	The landfill at Drehid has permission for the acceptance of 120,000 tonnes rMSW with a projected closure date of 2028. In June 2023, an application was lodged with ABP (reference: PA09.317292) for an extension to the existing facility. Should planning consent be granted a licence review will also be required to facilitate operation post 2028. The potential capacity post 2028 is excluded from the projections in this Plan as this capacity has yet to acquire either of the relevant consents.

There are a number of pending developments and changes which may contribute to additional capacity to help address this shortfall and these are documented in **Table 2.1.**

KEY DELIVERABLE 13
Thermal Recovery Capacity

The LGS supports the provision of additional thermal recovery capacity and this Plan provides guidance as to the capacity required.

The table shows the existing capacity of 1.68 million tonnes potentially increasing to 1.74 million tonnes in 2025 but then reducing again with the closure of Ballynagran landfill from 2027 and Drehid from 2028. Note that the projections include for the linear increased use of consented capacity at the cement plants to reach 400,000 tonnes capacity by 2030.

The projected available treatment capacity shown in **Table 2.2** is not sufficient to meet the shortfall in rMSW treatment capacity and this is shown in **Figure 2.1** for both the 45% and 50% recycling rate scenarios.

This figure illustrates that assuming all pending capacity changes are delivered, a shortfall in treatment capacity of the order of circa 200,000 tonnes by 2030 will still remain (assuming the prevention interventions and the range of recycling impacts are successful). If these interventions are unsuccessful, the shortfall in treatment capacity may be as high as circa 300,000 tonnes by 2030.

Table 2.2: Projected Residual MSW Treatment Capacity up to 2030

Year	Dedicated Thermal Treatment (tonnes)	Co-processing at Cement Plants (tonnes)	Disposal at Landfill (tonnes)	Total Capacity (tonnes)	Note
2020	820,000	225,000	358,000	1,403,000	-
2021	820,000	225,000	358,000	1,403,000	-
2022	820,000	289,040	358,000	1,467,040	Increase at Platin Cement (Co-processing).
2023	910,000	310,000	458,000	1,678,000	Increase at Knockharley (Disposal)
2024	910,000	322,857	458,000	1,690,857	Increase at Ringsend (Recovery)
2025	942,500	335,714	458,000	1,736,214	Increase at Mungret Cement (Co-processing at 64% capacity).
2026	975,000	348,571	383,000	1,706,571	-
2027	975,000	361,429	308,000	1,644,429	Commencement at Glanpower (assuming mid-year start)
2028	975,000	374,286	308,000	1,657,286	Reduced capacity at Ballynagran (planning expires in June)
2029	975,000	387,143	188,000	1,550,143	Cessation at Ballynagran
2030	975,000	400,000	188,000	1,563,000	-

KEY DELIVERABLE 14
Disposal Capacity

The LGS supports the retention of existing disposal capacity at landfill and will seek to secure contingency capacity subject to authorisation.

Currently, the gap in national treatment capacity is satisfied through exports, however, this Plan provides the framework for self-sufficiency through the provision of viable treatment infrastructure within the State.

Existing landfill capacity remains essential to the market. Future landfill capacity is regulated through policy TP15.1 which states such development is only supported in the context of compliance with the EU target of disposal to landfill of 10% of municipal waste by 2035.

rMSW TREATMENT:
Based on projected rMSW growth and a review of available treatment capacity, there is a projected continued and significant deficit in treatment capacity within the State of the order of 200,000 to 300,000 tonnes. The continued reliance on export of rMSW for treatment is unsustainable and there is a need for additional indigenous treatment infrastructure to meet current demand without compromising this Plans objectives on waste prevention, material reuse/repair and the next generation of recycling targets consistent with proximity and self-sufficiency principles .

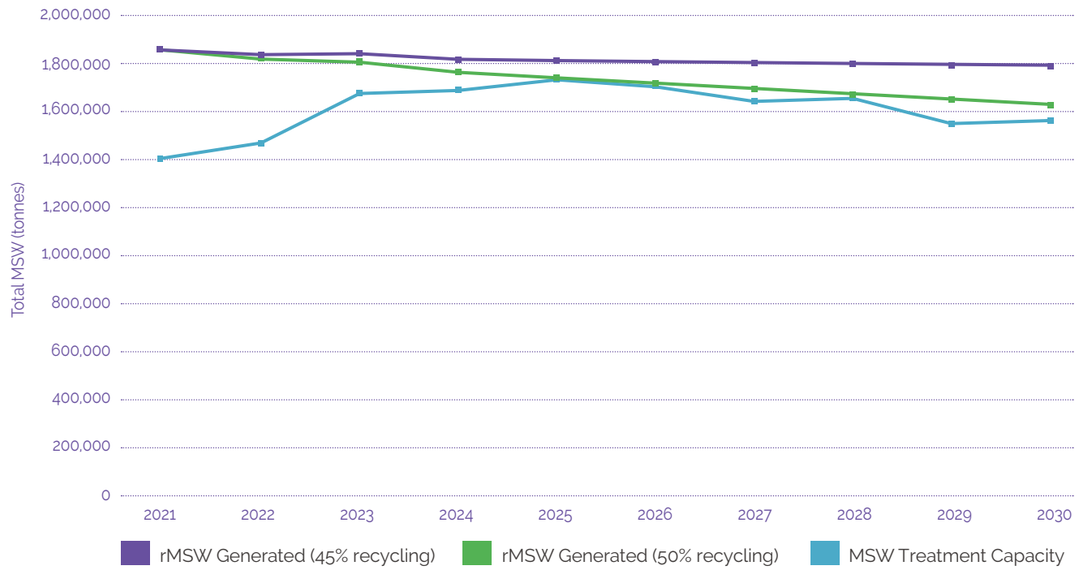


Figure 2.1: Projected rMSW Generation and available Treatment Capacity

KEY DELIVERABLE 15
Soil Recovery

The LGS will encourage the better distribution of soil recovery facilities (non-hazardous, greenfield) nationally to respond to the outcomes of national decisions.

2.3 C&D WASTE TREATMENT

Volume I highlights the following based on the 2020 National Report on C&D Waste[16].

There is significant capacity remaining at consented soil recovery facilities and the 2024 national Regulation 27 decision on greenfield soil and stone may reduce demand for this capacity.

The report recommends that better geographical spread of licensed facilities is required as currently 80% of available capacity is located in the Eastern-Midlands Region. Policy TP14.3 defines the need to monitor Soil Recovery Facility capacity to ensure adequate and appropriate authorisations are in place, in each region, to satisfy the need for soil recovery capacity.

Given the NDP policy for greater brownfield development, there is a capacity shortfall for facilities to treat non-inert non-hazardous wastes. For this reason, policy TP14.4 aims to closely monitor the provision of treatment capacity for non-hazardous C&D waste streams to ensure that waste is minimised, and recovery and circularity are maximised.

C&D WASTE TREATMENT:
There is a well-established gap in treatment capacity for non-hazardous C&D waste streams as this stream should no longer be allowed to compete with MSW for void space in MSW landfills. There is an urgent and growing need for additional infrastructure for this stream to ensure a regulated supply chain is maintained for the construction industry to manage these wastes.

[16] Link: https://www.gov.ie/en/publication/c305a-construction-and-demolition-cd-waste/

2.4 CAPACITY AND DEFICITS SUMMARY

Chapter 1 of this volume presents the predicted future growth in MSW and C&D generation over the Plan period. These predictions have accounted for an assumed impact of recently implemented or planned interventions to promote waste prevention, increase recycling and enable more circular resource management. The underlying trend is for a static waste generation level for both streams (i.e., 0% waste growth) but this is largely dependent on the success of the implementation of the interventions.

This chapter identifies that, against the backdrop of increasing MSW generation and a modest increase in recycling rate, the need for rMSW treatment capacity is growing while the availability of treatment capacity is largely static and will diminish in the medium term. As such, the required deliverables include for continued and expanded rMSW treatment capacity within the State to provide self-sufficiency and reduce the reliance on export. Any future capacity development needs to ensure that wider circular policies on prevention, reuse/repair and recycling are not compromised by new recovery infrastructure.

While total C&D waste is anticipated to reduce in the short to medium term (depending on the success of the national decisions on Regulation 27 and 28), there remains a national capacity deficit for non-hazardous C&D waste. While this waste may be managed at MSW landfills, the need to retain void space in these landfills for MSW has reduced capacity for these streams in recent years. Dedicated facilities for this stream need to be supported and expanded to meet the projected shortfalls.

3 INFRASTRUCTURAL REQUIREMENTS

The capacity gaps identified in **Chapter 2** of this volume highlight the need for key infrastructure deliverables to provide for greater circularity and self-sufficiency and to reduce the risk and reliance on waste exports. These infrastructure needs include supports to develop reuse, repair and recycling initiatives as well as more traditional recovery infrastructure which is required in the short to medium term.

Notwithstanding the need for infrastructure, core policies of this Plan for the protection of the environment (CP1) and climate (CP2) require that any new infrastructure or initiative developed under the policies of this Plan must have environmental protection and climate action inherent in the location, scale, design and operation. The siting guidance developed following the previous RWMP and included in this Plan (**Appendix 9 Volume IV Supporting Information**) will be key in ensuring environmental protection.

In addition to developing new infrastructure, there is a need to safeguard key existing infrastructure capacity to ensure that market stability for the waste streams with a capacity risk (identified in **Chapter 2**) is maintained.

Volume I identifies the criteria for nationally and regionally important infrastructure Core Policy CP12 endorses the need for this infrastructure to maintain a functioning waste market.

3.1 ADDITIONAL TREATMENT CAPACITY

The reuse and repair sector in Ireland has grown in recent years with sector leaders such as the Community Resources Network Ireland (CRNI) enabling members to deliver and record greater volumes of reuse and repair activity. However, the sector is labour intensive which drives up operational costs and lowers the competitive position of reuse/ repair practitioners.

KEY DELIVERABLE 16
Support Reuse and Repair

The LGS will support Reuse and Repair activities by encouraging innovation, identifying markets and coordinating training.

The need for greater interventions in the form of training and funding to support these initiatives is required to enable more circular resource loops.

Article 9(4) of the WFD requires the monitoring of the implementation of re-use initiatives by measuring re-use through a common methodology (Implementing Decision (EU)2021/19).

KEY DELIVERABLE 17
Monitor Reuse and Repair

The LGS will support the EPA in delivering reuse monitoring data and developing repair data to support this activity.

The EPA is responsible for this monitoring and this data has been used to establish a robust baseline for reuse. This baseline has also informed the reuse target in this Plan and will enable tracking of progress and the need for additional interventions to support this sector.

This Plan seeks to build on this monitoring regime and establish a robust target to promote growth of reuse activity. There is no equivalent monitoring requirement for repair activities but this Plan seeks to establish a similar monitoring and reporting regime with targets for both reuse and repair to track the transition.

While Ireland has some indigenous recycling capacity, a significant proportion of material is exported for recycling in other States (for example, only 18% of the packaging waste generated in 2021 was recycled in Ireland). With ambitious EU targets requiring the State to increase packaging recycling rates, reliance on exports cannot continue as the loss of valuable resources from the State coupled with the transport emissions make this practice unsustainable. This Plan seeks to support the development of reprocessing and recycling capacity within the State where this capacity is technically, economically and environmentally practicable (Target Policy TP13.1).

KEY DELIVERABLE 18
Waste Licencing

The LGS support the review of existing Waste Licencing arrangements to include mandatory timelines for approvals.

While the Plan aims to transition the State to a circular economy with a primary focus on prevention, reuse, repair and recycling, there remains a more immediate need for solutions such as recovery to help ease existing capacity deficits (in particular for rMSW).

Changing behaviours to prevent waste and improve segregation and enabling the development of higher tier solutions will take time to achieve a meaningful transition.

The existing capacity deficits identified for rMSW require the delivery of additional capacity in the short to medium term and hence the policy supporting additional thermal treatment is included within the Plan (Target Policy TP14.2).

The scale of thermal recovery supported is not designed to provide full treatment capacity for the projected shortfall as such a provision may hinder waste prevention initiatives and/or the development of higher tier treatment options. The scale of recovery supported enables a real reduction in capacity risk while maintaining a driver for greater prevention, reuse, repair and recycling to manage the projected waste growth.

The delivery of additional recovery capacity would be improved by an enhanced waste licencing approvals regime including mandatory timelines for the review and granting of waste licences.
While disposal of waste at landfill is the lowest tier of the waste hierarchy, there remains an operational need to maintain existing landfills within the State to help manage the current shortfall in rMSW treatment capacity and to deal with wastes that currently have no alternative outlets.

Directive (EU)2018/550[17] amends the Landfill Directive and requires the State to 'take the necessary measures to ensure that by 2035 the amount of municipal waste landfilled is reduced to 10 % or less of the total amount of municipal waste generated (by weight)'. This limits the use of landfill as a treatment option and this is reflected in target policy TP15.1: 'Additional disposal capacity for non-hazardous waste is only supported in the context of compliance with the EU target of disposal to landfill of not more than 10% of municipal waste by 2035'.

[17] Link: https://eur-lex.europa.eu/eli/dir/2018/850/oj/eng

3.2 NATIONALLY AND REGIONALLY IMPORTANT INFRASTRUCTURE

In recent years, An Bord Pleanála (ABP) have cited the absence of designated national scale waste treatment facilities in national policy as a barrier in decision making on major infrastructure. This Plan seeks to resolve this gap through identifying the relevant criteria for the type of facility that constitutes 'nationally and regionally important infrastructure' and endorsing the need for this infrastructure through a Core Policy (CP12). This information is provided to assist ABP, planning authorities and other relevant bodies in the decision making for consents of future waste and resource infrastructure applications.

Section 22(6)(b)(ii) of the WMA requires that the Plan includes details on 'existing major disposal and recovery installations' and an inventory of all waste installations has been included in Volume IV (Supporting Information). This inventory includes all local authority permitted (Appendix 6) and EPA licensed (**Appendix 7**) waste installations of all scales.

KEY DELIVERABLE 19
Nationally and Regionally Important Infrastructure (Criteria)

The LGS will liaise with ABP, planning authorities and other relevant bodies on the application of the criteria for Nationally and Regionally Important Infrastructure.

To resolve the policy gap for 'major' installations, **Volume I** includes a definition of nationally and regionally important infrastructure as: ***'installations of the type and scale deemed essential to maintain a functioning waste market within the State'.***

Given the capacity issues noted in **Chapter 2,** this definition applies primarily to installations of scale for the treatment of rMSW and construction wastes.

The criteria and thresholds for installations listed in **Volume II** identify the development classes that are prioritised as nationally and regionally important infrastructure under this Plan.

Only installations of scale are included within the definition; as such installations have the greatest potential for maintaining market functionality. This criteria may be revised as required to respond to changing market conditions and/or evolving capacity needs.

NATIONALLY AND REGIONALLY IMPORTANT INFRASTRUCTURE:

To provide clarity and transparency to both regulators and developers, the Plan presents criteria to describe infrastructure that is deemed nationally and regionally important. The need for this infrastructure is supported and endorsed by the Plan.

3.3 SITING GUIDANCE

Section 22 of the WMA was amended by the European Union (Waste Directive) Regulations 2020 (S.I. No. 323 of 2020) and now Section 22(6)(b)(vi) requires that the Plan provide **'sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations'.**

The previous RWMP set out to **'ensure there is a consistent approach to the protection of the environment and communities through the authorisation of locations for the treatment of wastes'.** To implement this, a policy action was prescribed to 'prepare siting guidelines for waste facilities and review general environmental protection criteria as set down in the waste plan'.

The LGS, led by the RWMPO, subsequently developed the **'Waste Management Infrastructure - Guidance for Siting Waste Management Facilities'.** The scope of the document includes broad siting criteria that address environmental risks (potential for pollution or nuisance, etc.), economic issues, planning considerations (land use zonings, designations, etc.) and social issues (health and wellbeing). These broad criteria include general principles for siting waste facilities that are to be adopted by developers and regulators.

KEY DELIVERABLE 20
Siting Guidance

The LGS will liaise with ABP, planning authorities and other relevant bodies on the implementation of Siting Guidance for Waste Facilities.

In addition to the general criteria, facility specific guidance is presented for consideration when siting the following types of facilities:

- Bring Facilities (bring banks and Pay~~to~~Use banks) and Civic Amenity Sites (CAS);
- Biological treatment facilities;
- Pre~~-~~treatment facilities for municipal and construction and demolition waste;
- Soil and stone recovery facilities;
- Authorised treatment facilities for End of Life Vehicles (ELVs);
- Waste storage facilities; and
- Thermal recovery facilities.

This siting guidance has been incorporated into this Plan and accordingly has been subject to the SEA and AA processes. The document is included in **Appendix 9 of Volume IV (Supporting Information).** Furthermore, the implementation of the guidance is expressly committed to through Target Policy TP11.1 which also commits to embedding the guidance in Local Authority Development Plans.

SITING GUIDANCE:

To fulfil the legal need for location criteria for site identification of waste facilities, a detailed suite of siting criteria has been developed to ensure a consistent and transparent approach to the development of waste infrastructure.

3.4 CONTINGENCY INFRASTRUCTURE

Volume I Section 5.8 notes that Policy E10 of the RWMP included a specific requirement to develop and maintain infrastructure to aid in waste management in the event of an unforeseen market interruption:
The waste plan recognises the need for ongoing disposal capacity to be available in response to events which pose a risk to the environment and/or health of humans and livestock. The local authorities of each region will monitor available contingent capacity annually.

KEY DELIVERABLE 21
Contingency Capacity

The LGS is committed to the provision of a national waste contingency facility with the support of government.

The need for contingency infrastructure remains relevant for this Plan in light of the ongoing capacity issues noted in **Chapter 2,** which shows that there is no significant contingency in the system to cater for unforeseen events.

As a consequence, the need to deliver contingency infrastructure is mandated in this Plan through Policy TP15.2 which seeks to ensure the provision of appropriate waste treatment contingency capacity in response to market disruption and/or events which pose a risk to the environment and/or health of humans and livestock.

To manage these risks, the LGS has undertaken a Feasibility Study which determined that the minimum contingency capacity required is 150,000 tonnes. Delivery of appropriate infrastructure of this scale is a requirement of this Plan.

CONTINGENCY CAPACITY:
There remains a clear and urgent need for contingency infrastructure within the State to cater for unforeseen events or disruptions to the other final waste treatment options being utilised (i.e. export and thermal treatment).

3.5 INFRASTRUCTURE SUMMARY

To enable the long term transition to a circular economy, this Plan has anticipated a series of infrastructural requirements to resolve shorter term capacity issues and to encourage longer term higher tier waste and resource infrastructure. The infrastructure supporting policy base presented in **Volume II** has been devised based on the current and projected shortfalls in market capacity. This infrastructure is deemed essential to ensure a functioning waste market as well as a growing circular market.

To support the planning process for waste infrastructure, there is a need to develop transparent criteria to describe infrastructure that is deemed nationally and regionally important. To resolve this policy gap, this Plan has established a suite of such criteria that clearly identifies types and scale of infrastructure that meets the definition of nationally and regionally important. These criteria may be employed by regulators and developers alike to inform the planning and development process.

Developing this infrastructure within the State but without compromising the protection of human health and the environment is a core policy of this Plan. As such, the provision of siting guidance for waste facilities has been included within the Plan to assist both regulators, such as ABP and planning authorities, as well as developers in identifying suitable locations for such infrastructure. This guidance will ensure that consistent environmental protection is embedded in the site selection and planning processes for all future infrastructure.

SUMMARY OF PART A DELIVERABLES

Volume III, Part A, Regulatory, Infrastructure and Climate Impact identifies a range of key deliverables which are required to enable the infrastructure policies and priority actions set out in Volume II of this Plan. Key Deliverables have been aligned with the key partners for the delivery of waste policy continuing the collaborative approach to the development of the Plan and emphasising the importance of co-ownership in the achievement of the Plan ambition and targets.

Figure 3.1 illustrates where specific action (A) is required by a key partner or where support (S) is required to other key partners for the achievement of the key deliverable. **Appendix 11 of Volume IV** provides a full index of the Key Deliverables under this Plan and maps these deliverables to the targets, policies and actions listed in **Volume II.** Organisational, engagement, monitoring and oversight arrangements are set out in **Part B and C** of this volume to underpin the achievement of the key deliverables identified for market and climate impact.

Measure	Deliverable	Key Partners					
		LGS		DECC		EPA	
1	National Food Waste Prevention Roadmap 2023-2025			Action			
2	Incentivised Charging for Non Household Waste			Action			
3	Continued Waste Prevention Campaigns	Action					
4	Enforcement of the Bye-Laws	Action					
5	Recovery Levy to Assist Recycling			Action			
6	Brown Bin Collection		Support				
7	National Decision – Regulation 27					Action	
8	National Decision – Regulation 28					Action	
9	C&D Best Practice Guidelines	Action					
10	Participation	Action					
11	Reduce Contamination	Action					
12	Reuse Infrastructure	Action					
13	Thermal Recovery Capacity		Support				
14	Disposal Capacity		Support				
15	Soil Recovery	Action					
16	Support Reuse and Repair		Support				
17	Monitor Reuse and Repair					Action	
18	Waste Licencing		Support				
19	Nationally Important Infrastructure	Action					
20	Siting Guidance	Action					
21	Contingency Capacity	Action					

Figure 3.1: Summary of Key Deliverables for Part A

PART B: ORGANISATION, ENGAGEMENT AND RESOURCES

4 ORGANISATION

Volume I Chapter 7 provides an overview of the existing organisational arrangements across the waste and circular economies in Ireland. Groups with waste related functions in the LGS are identified with key roles described. Key partners and stakeholders in the delivery of waste policy such as the EPA, DECC and industry are also identified with key roles described.

Existing organisational arrangements have been successful in delivering and maintaining a functioning and regulated waste market over the period of the RWMPs from 2015 to present. However, the new challenge of accelerating the transition to a circular economy requires an appropriate organisational response from the LGS and its key partners.

The move to a single national waste management plan, while retaining regional structures for implementation, requires greater cohesion between the waste functions of the LGS to enable effective collaboration with key partners and stakeholders.

Organisational arrangements must take account of the evolving role of the LGS within the wider waste landscape as it continues the transition from the direct provision of most waste services to an increased planning and regulatory role. For the first generation of waste management plans, the LGS had a level of ownership and direct control over collection and treatment systems with scope to exact real operational change through plan implementation. During this period the LGS led with the roll out of segregated collection systems, the provision of recovery facilities and the reduction in dependence on landfill.

Since the first plans, the role of local authorities has evolved significantly from 'owner/operator' to planning and regulating a largely privately owned and operated waste industry. This Plan is mindful of the ability of the LGS to deliver a transition to the circular economy alone and recognises the need for collaborative organisational arrangements that includes all stakeholders.

This chapter presents recommended organisational arrangements that respond to the challenge of implementing a national plan in collaboration with key partners and stakeholders.

4.1 INTERNAL ORGANISATIONAL ARRANGEMENTS

The LGS waste functions are delivered through a combination of shared services and directly through individual local authority activities. Existing shared services include:

- **Regional Waste Management Planning Offices (RWMPO)**

Under the auspices of Waste Management Planning Lead Authorities which were established to meet the waste management planning obligations of the sector. The RWMPOs report to Regional Waste Management Planning Steering Groups and the County and City Management Association (CCMA). There is a National Coordinating Group for Waste Management Planning to ensure consistency across the waste regions.

- **Waste Enforcement Regional Lead Authorities (WERLA)**

Established to coordinate and enhance the enforcement activities of the sector. The WERLAs report to Regional Waste Enforcement Steering Groups and the CCMA. There is a National Coordinating Group for Waste Enforcement to ensure consistency across the waste regions.

- **National Waste Collection Permit Office (NWCPO)**

Established as a shared service in Offaly County Council, to administer the waste collection permitting system, including waste data management systems, on behalf of the sector and reports to a CCMA Project Board.

- **The National Trans Frontier Shipment Office (NTFSO)**

Established to meet the transfrontier shipment of waste obligations of the LGS and reports to Dublin City Council.

- **The Local Authority Waste Programme Coordinator (LAWPC)**

Established to coordinate the shared service arrangements of the LGS together with the waste activities of individual local authorities and reports to the CCMA.

Individual local authorities deliver waste services directly through waste awareness/education, enforcement activities and the operation of waste facilities, including bring and civic amenity centres. Shared services engage with local authorities as required and with key partners and stakeholders depending on the shared service function. Shared services also liaise with the CCMA, who in turn engage directly with key partners including DECC and the EPA.

Existing organisational arrangements can contribute to multiple engagements resulting in duplication of effort. Organisational improvement is required to ensure that the sector can respond to the challenges of this Plan in a cohesive way to avoid duplication, inconsistencies and errors.

4.2 RECOMMENDED ORGANISATIONAL ARRANGEMENTS

The following sections set out recommended LGS organisational arrangements required to respond to the challenges identified in **Volume I** and to the policies and actions set out in **Volume II.**

4.2.1 Local Authority Waste Programme Coordinating Group

KEY DELIVERABLE 22
Local Authority Waste Programme Coordinating Group (LAWPCG)

The LGS will establish a Waste Programme Coordinating Group to coordinate the response of the sector to existing and future challenges.

A Local Authority Waste Programme Coordinating Group (LAWPCG) will be established to coordinate the functions of the existing shared services arrangements, together with the waste functions of individual local authorities, thereby enhancing the delivery of waste service and initiatives and strengthening the position of the sector in its engagement with key partners and stakeholders.

The LAWPCG will work collaboratively on continuous improvement to the Local Authority Waste Programme taking advantage of opportunities and implementing best practice. The group will be chaired by the Local Authority Waste Programme Coordinator (LAWPC), supported by the the Local Government Management Agency (LGMA) and report to the Climate Action, Transport, Circular Economy and Networks (CATCEN) Committee.

The objectives of the LAWPCG will include the following:

- To coordinate the delivery of this **Plan;**
- Identify **issues of strategic importance** and recommend appropriate actions;
- Participate in the **development of national policy** through submissions;
- Identify national regional and local waste **planning and enforcement priorities** and support local authorities in their achievement;
- To oversee and maintain an **appropriate regulatory environment** in support of the local authority waste programme;
- Monitor resource allocation to the Local Authority Waste Programme and **identify resource and training needs;**
- **Liaise with other relevant shared services** in particular on climate action and the contribution of circularity to carbon reduction; and
- **Contribute to the review of existing shared services** arrangements and make recommendations to ensure optimum alignment with legislative and policy challenges.

The membership of the LAWPCG will include the LAWPC, Regional Waste Management Planning Coordinators, Regional Waste Enforcement Coordinators, NWCPO, NTFSO and a representative from the CATCEN Committee of the CCMA. It is proposed that the group will convene quarterly.

4.2.2 Local Authority Waste Programme Organisational Pillars

LGS waste functions are diverse and are delivered nationally, regionally and locally. The functions can be broadly grouped as follows:

- **Waste Management Planning** by providing the framework required to manage waste and monitor, report and advise on waste generation and treatment capacity;
- **Waste Enforcement** at individual local authority level and coordinated by the WERLA;
- **Environmental Awareness and Education** to promote environmental protection and awareness through community and public engagement;
- **Waste Regulation** through compliance with waste and environmental legislation, specifically through the role of the NWCPO in waste collection authorisations and data management, and the role of the NTFSO in regulating the shipment of waste; and at individual local authority level for waste facility permitting and registration, and
- **Waste Operations** including civic amenity sites and bring centres.

The establishment of the LAWPCG will bring increased cohesion to the coordination of these various functions. In addition, two key organisational pillars will be established under the auspices of the LAWPCG to bring further clarity and transparency to the delivery of functions.

The first of the two pillars will deal with waste planning, circularity and infrastructure while the second pillar will combine the regulation and enforcement activities of the sector. **Figure 4.1** illustrates the proposed organisational pillars with associated responsibilities.

Organisational Pillar 1 (OP1) - Planning, Circularity and Infrastructure

KEY DELIVERABLE 23
OP1
Planning, Circularity and Infrastructure

The LGS will establish Organisational Pillar 1 (OP1) Planning, Circularity and Infrastructure to respond to the challenge of the transition to a circular economy.

The creation of OP1,Planning Circularity and Infrastructure, establishes a platform to accelerate the circularity agenda in parallel with the implementation of the policies and actions contained in this Plan. OP1 also includes waste awareness and education at local authority level and enables the continuation of the circularity discussion at that level, while the inclusion of local authority waste infrastructure enables the potential to facilitate circularity through local authority waste infrastructure.

The membership of OP1 will include Regional Waste Planning Coordinators, Regional Waste Prevention and Technical Officers and nominated Environmental Awareness Officers or alternative as required. It is proposed that the pillar would meet quarterly and be chaired by the LAWPC.

PILLAR 1
Planning and Circularity

- **Waste Management Planning**
- **Waste Awareness and Education**
- **Waste Infrastructure**

PILLAR 2
Regulation and Enforcement

- **Waste Enforcement**
- **Waste Regulation**
- **Recommended Minimum Criteria for Environmental Inspections (RMCEI)**

Figure 4.1: Organisational Pillars for delivery of LGS waste functions

Organisational Pillar 2 (OP2) - Regulation and Enforcement

KEY DELIVERABLE 24
OP2
Regulation and Enforcement

The LGS will establish Organisational Pillar 2 (OP2) Regulation and Enforcement to consolidate and align waste compliance activities.

The creation of OP2, Regulation and Enforcement, brings together the key activities on the compliance side of the LGS and provides for enhanced alignment. OP2 also ties in RMCEI as one of the primary indicators of performance in this area.

The membership of OP2 will include Regional Waste Enforcement Coordinators, NWCPO, NTFSO and nominated Environmental Enforcement Officers as required.

It is proposed that the pillar would meet quarterly and be chaired by the LAWPC.

The separation of local authority waste functions into two organisational pillars will assist with collaboration with key partners and stakeholders (refer **Section 4.3**). For example, collaboration on waste enforcement with the EPA Office of Environmental Enforcement or collaboration on capacity planning with DECC under separate pillars, will provide for more structured coordination.

INTERNAL LOCAL AUTHORITY SECTOR ORGANISATIONAL ARRANGEMENTS:

The establishment of the Local Authority Waste Programme Coordinating Group (LAWPCG) with two distinct organisational pillars will enhance the delivery of waste service and initiatives and strengthen the position of the LGS in its engagement with key partners and stakeholders.

Significant collaboration is ongoing in areas such as communications, capacity, construction resources and enforcement but the scale of the challenge set out in this Plan requires further enhancements to organisational arrangements.

4.2.3 Regional Steering Groups

Joint regional steering operational and task groups will be maintained at regional level to ensure systematic and continued engagement with individual local authorities and staff who have an important role in the delivery of existing services and in facilitating the transition to a circular economy. Regional organisational arrangements provide an important link to Elected Members and to Members of Strategic Policy Groups.

4.3 EXTERNAL ORGANISATIONAL ARRANGEMENTS

The LGS does not deliver waste policy alone, therefore, effective organisational arrangements with key partners and stakeholders are required to agree priorities, responsibilities, work plans and supports.

4.3.1 Key Partners

The first key external partner, both from a policy and funding perspective, for the LGS is DECC. DECC sets the policy context for the local authority and the wider waste sector through the Waste Action Plan for a Circular Economy (WAPCE). DECC also provides funding support for specific LGS waste functions and initiatives and projects which underpin these functions.

The local authority waste programme interfaces with the second key partner, the EPA, on a number of levels including prevention/awareness programmes, licensing, enforcement, monitoring and data collection. The EPA monitors local authority performance through the RMCEI system and is central to the transition to a circular economy with responsibility for the Circular Economy Programme (CEP).

4.3.2 Existing Arrangements

The implementation of existing waste management plans has been coordinated through the national coordinating committee for waste planning while the coordination of waste enforcement activities at regional level has been overseen by the national waste enforcement steering committee.

There is ongoing and collaborative engagement between the LGS, DECC and the EPA (for example through the Construction Industry Resource Groups and the Waste Capacity Steering Group). However, better alignment of work plans and priorities between the key partners for the delivery of waste policy is required to support the acceleration to a circular economy.

The making of a singular National Waste Management Plan in response to the Waste Action Plan for a Circular Economy, while embracing the Circular Economy Programme, confirms the critical organisational components for the effective delivery of policy as DECC, the LGS and the EPA.

4.3.3 Recommended External Arrangements

KEY DELIVERABLE 25
National Coordinating Group for Waste and the Circular Economy

DECC, LGS and EPA will collectively establish the NCGWCE to agree and align work plans, priorities, and supports to maintain the continuity of activities and accelerate the transition to a circular economy.

The key partners for the delivery of waste policy are DECC, the LGS and the EPA. It is recommended that a National Coordinating Group for Waste and the Circular Economy (NCGWCE) be established consisting of these key partners to coordinate the delivery of measures and actions contained in the WAPCE, this Plan and the CEP.

The central objective of this group will be to coordinate the work plans of the key partners and agree annual and multi annual priorities which will be reflected in the annual work programmes of each of the key partners.

A key advantage of this arrangement is to ensure the coordinated and integrated approach to messaging, resourcing and delivery. It is anticipated that the NCGWCE will meet formally on a biannual basis (spring / autumn) to establish and agree work plans and priorities.

A key priority for the NCGWCE will be the identification and implementation of the additional interventions required to bridge the gap between the predicted recycling rates with current interventions and the EU recycling rates for 2025, 2030 and 2035.

4.3.4 Enabling Groups

KEY DELIVERABLE 26
Enabling Groups

In Year 1 of the Plan the NCGWCE will review all enabling groups / arrangements and make recommendations.

The establishment of enabling groups to support the work of the NCGWCE will be required in addition to, or replacing, existing enabling/working groups.

Following the establishment of the NCGWCE and within one year of the publication of this Plan, a review of all existing enabling groups will be undertaken by the NCGWCE to identify the need to revise, replace or consolidate these groups in line with the priorities of the NCGWCE.

It is recommended that future enabling groups established by the LGS be aligned with the Focus Areas identified in **Volume II.**

4.4 ORGANISATION SUMMARY

The 'business as usual' model of delivery will not accelerate the transition to a circular economy, therefore this chapter sets out a series of recommended internal and external organisational arrangements to respond to the challenges identified in **Volume I** and the policies and actions in **Volume II.**

The recommended arrangements will ultimately inform the process of review of shared services internally within the LGS, which will determine the preferred organisational structure to maintain the sectors response to the waste and circularity challenge.

This approach supports Core Policy CP6 which seeks to ensure that the planning, regulatory and enforcement functions of the LGS are appropriately aligned and organised through the office of the LAWPC to respond to existing challenges and support the transition to a circular economy.

Figure 4.2 illustrates the relationship between key partners and work areas proposed under the National Coordinating Group for Waste and the Circular Economy.

EXTERNAL ORGANISATIONAL ARRANGEMENTS:

The establishment of a National Coordinating Group for Waste and the Circular Economy between the LGS, DECC and EPA will provide clarity in relation to roles, responsibilities, priorities, and supports and ensure the integrated delivery of policies measures and actions contained in the WAPCE, this Plan, the Climate Action Plan and the CEP.

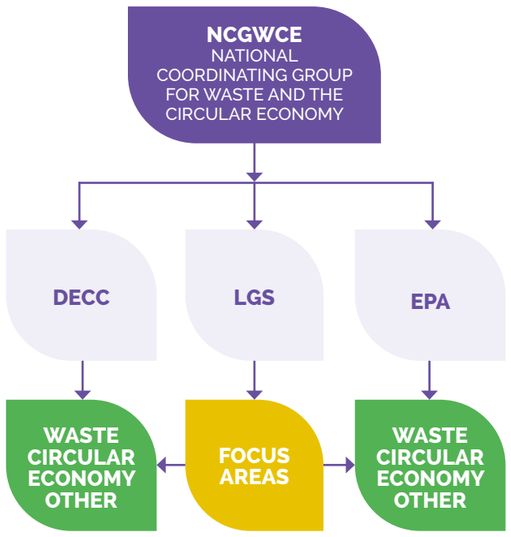


Figure 4.2: NCGWCE Structure

5 ENGAGEMENT

The report on the evaluation of the RWMP (**Appendix 3 of Volume IV**) highlighted delivery successes together with issues to be addressed in this Plan. One of the key successes identified was the establishment, management and delivery of strong collaboration between key partners and stakeholders which greatly assisted with the response to specific challenges, including the Covid-19 pandemic. It is essential that these engagements are continued and further developed through the lifetime of this Plan to enable further meaningful change and to assist with the transition to a circular economy.

The evaluation report also pointed to limited progress in the delivery of the three headline strategic targets of the RWMP covering prevention, recycling and landfilling. The evaluation noted that while the LGS is tasked with providing the structure and framework for delivery of the targets in the plans, the sector does not control all of the drivers necessary to achieve these targets thus the requirement for proactive collaboration and engagement. The sector is not solely responsible for the achievement of targets and the evaluation pointed to the need for a shared ownership model for this Plan and associated targets.

The RWMPOs adopted the collaborative shared ownership model in the development of this Plan which included an intensive series of thematic consultations with key partners and stakeholders to inform the content of the Plan. This approach helped to produce the policies and actions contained in **Volume II** and enabled the identification of key deliverables contained to support the achievement of the ambition of this Plan.

This chapter presents proposals to support continued successful engagement with key partners and stakeholders building on the engagement that has informed the development of this Plan.

5.1 STAKEHOLDER ENGAGEMENT IN PLAN DEVELOPMENT

The development of this Plan commenced with a clear collaborative and structured approach to establishing waste and circular priorities with key partners and stakeholders. This engagement was essential to develop a sense of shared ownership in the Plan ambition, targets, policies, actions and key deliverables.

Engagement on the Plan development commenced in late 2021 with a series of co-ownership workshops convened by the RWMPOs to capture the views of key stakeholders on the priorities, risks and opportunities facing the wider waste sector that are relevant to this Plan. These engagements were carried out on a thematic basis with twin workshops for each of the following themes:

- **Consumption** (trends in consumption patterns and waste generation);
- **Capture** (focus on waste collection systems and rates); and
- **Compliance** (regulation and enforcement).

KEY DELIVERABLE 27
Stakeholder Engagement

The LGS is committed to continued key stakeholder engagement consistent with the focus areas identified in the Plan.

Baselines for each theme were presented at the first workshop to identify issues. The second workshop captured feedback on how the policies and actions in the Plan could effect change in these areas. Stakeholder feedback was recorded and used to inform the development of the targets, policies and actions presented in **Volume II.**

In addition to the thematic workshops, a series of targeted engagements were held with specific stakeholders on key focus areas. These engagements included meetings with compliance schemes, reuse practitioners and industry groups to allow for a more detailed discussion on selected focus area topics to inform the Plan development. The RWMPOs convened a series of direct engagement meetings with DECC and the EPA as key partners throughout the development of the Plan. These engagements covered a range of topics including:

- Requirements of the WAPCE and wider circular policy;
- Evolving regulation and next generation targets;
- Waste data and trends;
- Plan ambition and targets; and
- Future engagement under the Plan.

Feedback from workshops, meetings, and other engagements with the DECC and EPA have been considered and incorporated into the preparation of this Plan.

Detailed and thorough internal engagement within the LGS was also undertaken to inform the Plan development. This included detailed workshops and discussions with groups including the CCMA, WERLAs, EAOs, NWCPO, NTFSO, Regional Steering Groups and others.

The CCMA established a National Oversight Group to oversee the development and making of this Plan. The oversight group consisted of representatives from a range of grades within the sector and considered each element of the Plan in conjunction with the RWMPOs.

The oversight group was tasked with the recommendation to proceed to publication of the Plan subject to agreed criteria and ultimately with the recommendation to proceed with the making of the Plan.

This Plan is subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) statutory processes and the Plan and accompanying environmental assessments will be published to facilitate wider comment from the public.

STAKEHOLDER ENGAGEMENT:

During the preparation of this Plan, a series of detailed engagements have been undertaken with both internal and external stakeholders to capture views to inform the contents of this Plan. All views captured have been considered in the preparation of this Plan and submissions made during the public consultation period have been considered in the making of the final Plan.

5.2 CONTINUITY OF STAKEHOLDER ENGAGEMENT

The continuation of collaborative engagement throughout the implementation of this Plan will be central to the achievement of the ambition, targets policies and actions set out in this Plan and will support the work and priorities of key stakeholders.

Engagement will take different forms both formal and informal and will vary for groups such as the key partners, key stakeholders, stakeholders with a specific function in one or more focus areas, and the wider waste audience.

This section outlines proposed engagement arrangements through the Plan period.

5.2.1 Key Partners

Chapter 4 of this volume identifies DECC and the EPA as key partners for the LGS in the delivery of this Plan. The LGS will present a unified position under the recommended Local Authority Waste Programme Coordinating Group (LAWPCG) and this group will directly and formally engage with DECC and the EPA under the recommended National Coordinating Group for Waste and the Circular Economy (NCGWCE).

This NCGWCE consists of the three key partners with combined and overlapping responsibility for setting policy, changing behaviours, regulation/ enforcement, reporting data and market oversight.

Establishing a consensus and collaboration between the three key partners will be essential to delivering the required interventions on preventing waste, promoting circularity and the success of this Plan and other national plans.

KEY DELIVERABLE 28
National Forum

LGS, DECC and the EPA will cooperate to facilitate an annual national forum on waste and the circular economy to maintain collaborative engagement.

It is anticipated that this national coordinating group will formally meet on a biannual basis (spring and autumn) to establish priorities and agree work plans. Outside of this formal engagement, ongoing informal engagement will be maintained with the recommended LAWPCG and the two organisational pillars presented in **Chapter 4.**

Core Policy CP4 of this Plan requires collaboration with key stakeholders on the delivery of core and targeted policies and priority actions.

The policy also requires collaboration to ensure appropriate financial and human resources are provided to underpin the role and response of the LGS to the challenges identified in **Volume I** and the policies and actions set out in **Volume II.**

5.2.2 Other Key Stakeholders

In addition to the key partners there are a range of key stakeholders that will play a role in delivering on the ambition and targets in this Plan and continued engagement with these groups is essential. Key stakeholder groups can be categorised as follows:

- **Industry -** The waste industry is a broad church encompassing the collection processing / treatment, recycling, recovery, disposal and export of waste materials. Industry is represented by a number of organisations including the **Irish Waste Management Association (IWMA), the Confederation of European Waste-to-Energy Plants, the Chartered Institution of Wastes Management, Cré, the Construction Industry Federation and Cement Manufacturers Ireland.**
- **Compliance Schemes - Compliance Schemes** work on behalf of producers to take back goods and materials at the post-consumer stage for recycling and recovery. Ireland currently has six compliance schemes for packaging waste, waste tyres; WEEE, batteries, end-of-life vehicles and farm plastics with a seventh recently added for tobacco filter products under the SUP. Under the WAPCE and the SUP Directive there are potential additional compliance schemes that may be implemented during this Plan.
- **Non-Governmental Organisations (NGOs) -** The growing **reuse, repair and recycling network** within the State will be supported and promoted through this Plan. Current organisations in this space include the **Community Resources Network Ireland (CRNI), Irish Charity Shops Association (ICSA), the Rediscovery Centre and VOICE.**

Engagement with these groups can be informal and intermittent, reactive rather than proactive. With regard to industry, there is ongoing and formal engagement through the regulatory regime where the operators primary point of contact is with the local authority regulator or enforcement officer. Collaboration with these groups is essential to the achievement of Plan and EU targets and to achieve the successful delivery of the policies and actions set out in **Volume II.**

These stakeholders typically have a very strong focus on a particular aspect of the market, be it a waste stream and/or collection or treatment infrastructure. As a consequence, it is proposed that a formal engagement structure will be devised based on the 16 focus areas identified in **Volume II** and described in **Chapter 4** of this volume.

Where there is clear overlap between some focus areas (e.g. Municipal Household and Municipal Commercial), these may be combined to minimise duplication and facilitate a wider action agenda. At the outset, these Focus Area Enabling Groups will be delivered as follows:

- Establishment of the appropriate stakeholders for each group;
- Set the objective of the group to collaboratively deliver on the relevant target, policy or action of this Plan;
- Identify an agreed frequency of direct formal engagement between the parties but as a minimum this is assumed to be biannual through seminars or other group events; and

- Agree the communication pathways for informal engagement outside of the above.

Feedback from the above stakeholder engagements will be communicated to the Local Authority Waste Programme Coordinating Group (LAWPCG) and the National Coordinating Group for Waste and the Circular Economy (NCGWCE) and used to inform annual work plans.

Engagement will also be maintained with EU Groups including the Association for Cities and Regions for Sustainable Resource Management ACR+.

CONTINUED ENGAGEMENT:

To facilitate the continued collaborative and shared ownership approach to the implementation of this Plan, the LGS has proposed engagement arrangements with key partners and stakeholders to maintain the momentum established in the preparation of the Plan.

5.3 PUBLIC ENGAGEMENT

Public engagement on waste issues is undertaken by a range of stakeholders and it is proposed that the recommended establishment of the NCGWCE and the LAWPCG as set out in **Chapter 4** will deliver better integration of messaging nationally regionally and locally.

The RWMPOs have established mywaste.ie as a single platform for all waste related information for the public and have also developed a space on the platform for business.

The public face of environmental and waste awareness at local authority level are the Environmental Awareness Officers (EAOs). This role is broad and can cover diverse environmental matters such as climate, energy, biodiversity, water, waste and litter prevention; therefore, the commitment to waste and the circular economy is limited.

The evaluation of the RWMP also identified inconsistencies in local authorities being able to resource and retain suitable full time EAOs to deliver this function.

The evaluation report recommended that the provision of EAOs in each local authority be continued and enhanced to ensure key messaging is maintained to protect the environmental advances that have been made.

Chapter 6 identifies the requirement for additional resources at local authority level to assist with the acceleration of the transition to a circular economy through direct engagement with the public and business.

PUBLIC ENGAGEMENT:

To maintain waste management and behavioural advances, in line with the ambition of this Plan, resources must be provided and maintained in each local authority area.

5.4 ENGAGEMENT SUMMARY

The recommended organisational arrangements presented in **Chapter 4,** will enable consistent and continued engagement with key partners and stakeholders to ensure ongoing collaboration on the targets policies and actions contained in this Plan.

The establishment of the National Coordinating Group for Waste and the Circular Economy will ensure that the key partners in the planning and regulation of the market (LGS, DECC and EPA) will have an agreed platform on priorities and programmes over the life of the Plan.

The Focus Area Enabling Groups will allow the LGS to formalise existing engagements into more collaborative arrangements with key stakeholders to manage messaging and progress for the focus areas listed in this Plan.

Engagement with the general public, business and the wider community will be maintained to ensure that advances are not lost in the transition to a circular economy.

Figure 5.1 illustrates the proposed engagement enhancements in the context of the organisational proposals set out in **Chapter 4.**

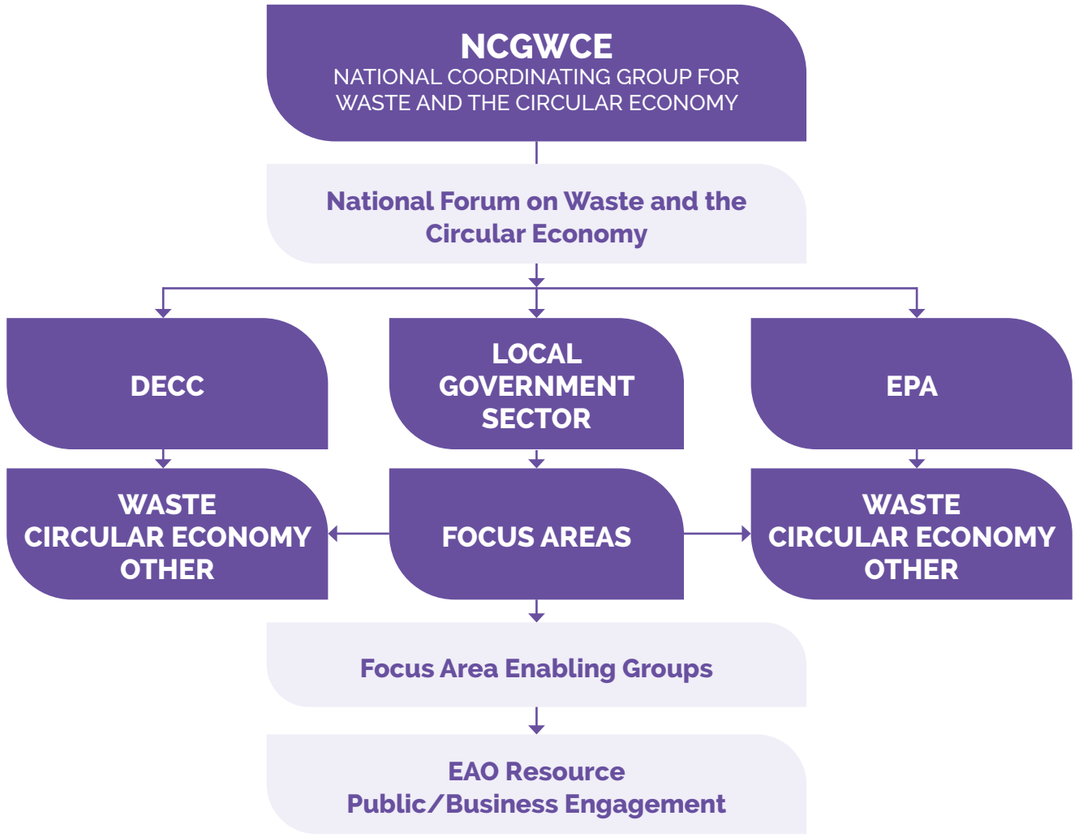


Figure 5.1: Proposed Enhancements to Engagement

6 RESOURCES

6.1 OVERVIEW

Volume I Chapter 8 presents an overview of existing financial, human, and market resources deployed across the waste sector including the current levels of income and expenditure by central and local government and the human resource required in the LGS to maintain existing services and obligations.

The overall trend shows reducing income to the Environment Fund as behaviour change (reduced use of plastic bags) and market changes (reduced landfilling) have become embedded. While this illustrates the value of financial instruments such as levies in influencing behaviour and enabling change, diminishing incomes increase the requirement on central government to fund waste planning, awareness and enforcement.

Volume I Chapter 8 also presents the current baseline of financial and human resources required by the LGS to deliver the RWMP and maintain business continuity. The data gathered is presented as a national resource matrix across all of the key functions of the sector highlighting current inputs. The resource input has been monetised to illustrate the current commitment from central and local government to delivering the RWMP and maintaining 'business as usual'.

The ambition of this Plan is to accelerate the transition to a circular economy and it is accepted that 'business as usual' will not achieve this ambition. However, the current levels of sector funding must be maintained for continuity and the known budget deficits for the sector must be addressed.

This chapter sets also out the additional resources required to accelerate the transition to a circular economy and these will be required in key areas such as:

- **Communications** (Campaigning, Awareness and Promotion);
- **Engagement** (National, Regional and Local);
- **Regulation** (NWCPO); and
- **Investment** (Circular Infrastructure).

Additional resources required are based on the estimated resource need to deliver on the ambition, targets, policies and actions listed in **Volume II** and represent the financial and human resource cost of transitioning to a circular economy by the LGS.

This chapter supports Core Policy CP13 which aims to identify the costs associated with the Plan ambition and to attract funding and support for initiatives and projects that underpin the core and targeted policies and priority actions.

6.2 BUSINESS CONTINUITY

KEY DELIVERABLE 29
Business Continuity

The LGS is committed to business continuity across all waste functions subject to the continuation of established supports from Government.

Maintaining the current levels of expenditure on local authority waste functions will be essential to maintain the existing structures and operations currently in place and to protect the environment.

Volume I Chapter 8 summarises waste functions expenditure of the LGS in 2021 and highlights that total expenditure equated to €281 million in 2021.

It is anticipated that maintaining the current local authority waste function will continue to cost circa €280 million annually over the Plan period to 2030 (including street cleaning and litter management).

The data also shows that total income across waste functions was €64 million resulting in a sectoral deficit of €217 million in 2021. This deficit is in line with recent trends from 2018 to 2022 where a deficit of €206-225 million has been recorded rising annually by circa 1/2% per annum.

The operations which incur the greatest deficits include street cleaning (€118 million), litter management (€28 million), landfill aftercare (€25 million), recovery/recycling (€24 million) and enforcement (€14 million).

Operating with a budget deficit on this scale is unsustainable and this Plan commits the LGS to examining potential measures and strategies to mitigate the deficits in each of the identified functions. To address existing financial deficits a strategic response is required and where interventions are identified that support the achievement of targets, enhance circularity and support climate action, additional government support will be required.

The scale of existing support is presented in **Volume I Chapter 8** and this funding is required to maintain business continuity and the ongoing protection of the environment.

KEY DELIVERABLE 30
Street Cleaning / Litter Management

The LGS will review street cleaning and litter management activities to identify cost mitigation measures and potential contributions to circularity and recycling rates.

Expenditure on street cleaning (€121 million) and litter management (€32 million) represent a combined 54% of all local authority waste expenditure which is heavily weighted to large urban authorities.

With minimal current incomes (combined €6 million) associated with these functions, the LGS has committed to establishing and delivering cost mitigation measures to aid in reducing the current operational deficits. This deliverable will be led by the Eastern Midlands RWMPO and supported by the other regional groups.

KEY DELIVERABLE 31
Landfill Aftercare

The LGS will undertake a strategic review of landfill aftercare activities to identify cost mitigation measures and potential contributions to environmental improvement and climate action.

Landfill aftercare costs include the management of leachate, landfill gas, drainage and monitoring and in 2021 local authorities budgeted €35 million for this function. While some income is generated (€10 million in 2021) there remains a significant deficit associated with this function.

The LGS has identified potential interventions which may be implemented to reduce costs and the Southern RWMPO will lead on these interventions. The development of a national landfill aftercare strategy with a particular focus on leachate and gas management costs may contribute to delivering costs savings.

KEY DELIVERABLE 32
CAS Report

The CCMA CAS Working Group will progress the recommendations of the CAS Review including the identification of baseline and additional investment required for the network.

The operation of CAS and bring centres by the LGS was budgeted at €39 million in 2021. Some income is generated through these collection systems (€15 million in 2021) but there is scope to increase these incomes and reduce the operating deficits.

The implementation of the recommendations of the Civic Amenity Site Review are being considered by the CCMA. It is anticipated that deficit reduction will be a key consideration for this group through more integrated systems, improved procurement and standardisation of charges.

KEY DELIVERABLE 33
Enforcement Funding

The LGS will review the local authority enforcement funding model to mitigate existing deficits and identify additional enforcement requirements.

The local authority waste enforcement function was assigned a budget of €38 million in 2021. While government support of €24 million reduces the operating deficit, there is scope for greater efficiency to further reduce this deficit which will be reviewed by the Connacht Ulster RWMPO.

Increased enforcement activities under this Plan to accelerate the transition to the circular economy (refer **Section 6.3.3**) will require additional enforcement resources which may impact the current funding model.

A further review of the local authority waste enforcement funding model and the totality of funding available is required to identify resources required to drive changes needed in relation to material use and reuse.

In addition to the budgets presented for 2021 there remains a commitment to the delivery of appropriate waste treatment contingency capacity to maintain business continuity at an anticipated capital cost of circa €10-12 million and a further €2 million annual operational cost.

BUSINESS CONTINUITY:

Retention of the existing resource inputs is essential to maintain a 'business as usual' waste function and these inputs are predicted to amount to circa €280 million per annum. This will require continued investment from central and local government with the LGS seeking ongoing interventions to reduce operating deficits.

6.3 ADDITIONAL RESOURCES

Additional resources for the delivery of this Plan include primarily financial and human, however, the endorsement or support of an initiative or position is also important as the transition to a circular economy takes place.

The additional resources required to accelerate the transition to a circular economy fall broadly into four categories: Communications, Engagement, Regulation and Investment.

6.3.1 Communications

The transition to a circular economy will require a significant change in the behaviour of all citizens to shift the focus from current attitudes and practices to a more focussed approach to waste prevention, reuse, repair and circularity. This is reflected in Core Policy CP5 which states:

Create better understanding, through polls, surveys and research and then influence and encourage informed behavioural improvements in business and households through Local Authority and external networks and coordinated multi-agency awareness campaigns, including mywaste.ie, to prevent waste and manage resources to increase the value and circular potential of materials.

KEY DELIVERABLE 34
Communications Strategy

DECC, LGS and the EPA through the NCGWCE will develop a multi annual National Circular Economy Communications Strategy to be implemented in partnership.

To deliver CP5, messaging and coordinated multi-agency awareness campaigns will require additional investment. This investment will be in human resources and technology to develop and deliver the required level of consistent and coordinated messaging nationally supported by other agencies.

The investment will supplement and complement existing awareness arrangements with more focussed communications designed to improve behaviours nationally and promote prevention, reuse, repair and circularity.

KEY DELIVERABLE 35
Communications Strategy - Implementation

It is anticipated that an additional €1M will be required annually from government to implement the Circular Economy Communications Strategy.

Each of the material stream focus areas presented in **Volume II** have a series of policies and actions on developing and delivering specific awareness campaigns and projects to improve behaviours on prevention, reuse and repair. Policies/actions relate to both LGS campaigns and supporting the campaigns of key partners such as DECC and the EPA.

The RWMPOs will develop a national **Circular Economy Communications Strategy** encompassing the requirements of the WAPCE, this Plan and the CEP to be agreed by the NCGWCE.

COMMUNICATIONS:

It is anticipated that the implementation of the Circular Economy Communications Strategy will cost at least €1 million annually in additional funding.

6.3.2 Engagement

To accelerate the transition to a circular economy, increased engagement will be required nationally, regionally and locally. Targeted engagement with key stakeholders will be required to enable initiatives and interventions that increase circularity. **Volume II** identifies 16 focus areas where circularity can be progressed and embedded over the life of this Plan and **Chapter 4** of this volume highlights the potential for enabling groups in each of these focus areas.

Building on the Circular Economy Communications Strategy described in Key Deliverable 34, additional engagement can be facilitated at regional and local level through the LGS.

Regional Engagement

KEY DELIVERABLE 36
Regional Circularity Resource

The LGS will facilitate the provision of a **regional** circularity resource/s to coordinate the implementation of the communications strategy and enhance circularity engagement across the sector and with key stakeholders subject to support from government.

The Regional Waste Management Planning Offices (RWMPO) have an allocation of 11.3 full time resources to deliver the RWMP and to coordinate the waste planning functions of the LGS.

This Plan places significant additional requirements on the RWMPOs both to maintain the waste planning function of the LGS and to accelerate the transition to a circular economy. Arising from the implementation of WAPCE measures, additional requirements include the following:

- Devising baseline data to support monitoring and tracking of national reuse and repair targets;
- Monitoring and tracking a series of additional Plan targets on consumption and contamination;
- Participation in the Local Authority Waste Programme Coordinating Group, Pillar 1 Planning and Circularity (refer **Chapter 4**); and
- Participation in the National Coordinating Group for Waste and the Circular Economy (refer **Chapter 4**).

To deliver the necessary engagement at regional level to accelerate the transition to a circular economy, additional resources will be required. The RWMPOs have demonstrated the ability to deliver coordinated national initiatives such as mywaste.ie.

Dedicated resources provided at combined regional level offer the potential for national coordination on circularity and a link between the NCGWCE (OP1 – Planning and Circularity) and individual local authorities.

REGIONAL ENGAGEMENT:

It is anticipated that the provision of dedicated circularity resources at regional level will cost at least €0.5 million annually in additional funding.

Local Engagement

KEY DELIVERABLE 37
Local Circularity Resources

The LGS will facilitate the provision of **local** circularity resource/s to enhance circularity engagement across the sector and with key stakeholders subject to support from government.

Volume I Chapter 8 on current Financial Human and Market Resources indicates that the LGS currently deploys 41 full time resources on environmental awareness and education.

To accelerate the transition to a circular economy, enhanced engagement is required across the LGS with the public, business and small to medium enterprises.

The LGS provides a gateway to communities and enterprise through established arrangements such as the Local Enterprise Offices. In addition, the regulatory and enforcement functions of the LGS currently provide for direct engagement with the waste industry which may be enhanced to promote more circular sector.

To achieve meaningful behaviour change, there is a need for significant investment in additional dedicated circularity resources in each local authority.

LOCAL ENGAGEMENT:

It is anticipated that the provision of a dedicated Circularity Resource in each Local Authority will cost at least €2 million annually in additional funding.

6.3.3 Regulation

The LGS waste enforcement function is coordinated by the WERLA (10 regional resources in 2022) and delivered locally (225 resources in 2022 across all local authorities). Many of the material stream focus areas in **Volume II** contain policies or actions requiring increased enforcement activities.

KEY DELIVERABLE 38
Regulation

Additional investment in the NWCPO will be required from government to deliver incentivised charging for non-household activities.

This Plan places a renewed focus on the application of the waste storage and presentation bye-laws to achieve the contamination target set for the recycling and organic bins.

In addition, the Circular Economy Act 2022 permits the use of CCTV and/or mobile recording devises to assist in waste enforcement. The capital and maintenance costs of these devices is a further resource requirement to supplement existing enforcement resources.

Central Government continues to support the WERLAs and have given a commitment to the proposed enhanced WERLA arrangements. In addition central government support individual local authority enforcement activities through the enforcement funding model.

The National Waste Collection Permit Office (NWCPO) has a human resource allocation of 17.1 full time resources in 2022. The WAPCE has signalled new regulatory roles for the NWCPO as well as introducing new policies that will impact on current operations (such as the introduction of incentivised charging arrangements for commercial operators supported by this Plan). These increased functions will require additional NWCPO activity and enhanced resourcing of this local authority shared service.

REGULATION:

It is anticipated that further regulatory investment will be required to support the transition to a circular economy and particular investment will be required in the NWCPO shared service of an additional €0.6 million annually as a minimum. Any investment will be subject to the governance procedures of the Public Services Oversight Group.

6.3.4 Investment (Public)

KEY DELIVERABLE 39
Public Investment

The LGS is committed to facilitating reuse and circularity through the CA site network however significant support will be required from government to achieve this outcome.

The targets for reuse and repair introduced in this Plan demonstrate a significant commitment to the delivery of appropriate circular infrastructure by the LGS. The key target is to facilitate reuse at designated Civic Amenity Sites.

This target will require significant capital investment to repurpose the prescribed number of sites to facilitate reuse hubs at these facilities. This repurposing will require significant levels of both capital and operational resources to implement.

The 'National Review of Civic Amenity Sites' in 2020[18] stated that the typical capital investment for a local authority at a CAS is €2.7 million; however, to implement the necessary circular infrastructure will be less (estimated circa €0.5 million per site as an average).

[18] Link: https://www.mywaste.ie/wp-content/uploads/2021/02/National-Review-of-Civic-Amenity-Sites.pdf

Operationally, the annual resource requirement would be limited to offices, storage, equipment, maintenance, security and personnel and may be recouped through a revised and consistent charging regime as recommended by the 'National Review of Civic Amenity Sites'.

It is expected that the implementation of the National Review of Civic Amenity Sites will result in cost savings for the sector through increased efficiencies.

INVESTMENT (PUBLIC):

It is anticipated that the cost of repurposing the prescribed number of civic amenity sites for reuse/ circularity is €15 million or €2.5 million per annum over the life of the Plan.

6.3.5 Investment (Private)

In addition to the public sector infrastructure resource need, there are a series of targeted policies in this Plan that support the private sector investment in circular infrastructure. These policies are across a range of focus areas and a non-exhaustive list is presented as follows:

- TP4.3: Identify potential enhancements to existing collection and segregation systems and options for additional waste streams including material from street cleaning and litter management.
- TP4.4: Develop an integrated, consolidated and coordinated public waste collection infrastructure network that responds sustainably to consumer needs, regulatory and policy challenges, and the circular economy with the support of central government.
- TP12.1: Promote the development of repair and preparing for reuse initiatives with the provision of technical, regulatory and financial support working in partnership with the voluntary sector and other parties through the National Reuse and Repair Partnership.
- TP12.3: Support the development of viable reuse/ repair infrastructure and initiatives including materials recovery or other advanced pre-treatment infrastructure that increases the circular potential of materials.
- TP12.4: Encourage the development of circular activities which stimulate and support viable secondary material markets and secondary product markets in the construction, industrial and bioeconomy sectors.
- TP13.1: Support the development of pre-treatment (for recycling), reprocessing and recycling capacity where technically, economically and environmentally practicable in line with the proximity principle.
- TP13.2: Support the development of plastic management infrastructure to ensure that a clean, reliable feedstock is available to processing and recycling plants.
- TP13.3: Support the development of recycling capacity and outlets for waste tyres in line with the proximity principle to reduce the reliance on export of this waste stream.
- TP13.4: Work with key stakeholders to maximise the circular potential of anaerobic digestion and composting facilities to deliver high quality outputs with high circular potential.
- TP13.5: Support the provision and maintenance of appropriately scaled biological treatment capacity within the State.

KEY DELIVERABLE 40
Private Investment

The LGS has provided the framework for investment in infrastructure by the private sector in the Plan.

Private sector investment in collection and treatment infrastructure will be essential to create and maintain a functioning circular market. Support from the public sector through transparent and enabling policies and actions will aid the delivery of sustainable and viable private sector investment.

ADDITIONAL RESOURCES:

Existing resources must be supplemented to accelerate the transition to the circular economy. This Plan identifies that the total additional investment equates to not less than €6.6 million per annum to fund these additional circular functions in communications, engagement, regulation and investment.

6.4 FUNDING MODEL

A 'business as usual' funding model to deliver existing waste functions is presented in **Volume I Chapter 8** and represents baseline commitments from central and local government to ensure business continuity. Business continuity inputs are predicted to amount to circa €280 million per annum and will require continued investment from central and local government to ensure continued delivery of existing functions.

An updated model is presented in **Table 6.1** which highlights the additional resources required to accelerate the transition to a circular economy which is summarised in **Figure 6.1.** In summary, the minimum additional resources identified are:

- **Communications** — **€1 million annually**
- **Engagement**
  - **Regional** — **€0.5 million annually**
  - **Local** — **€2 million annually**
- **Regulation** — **€0.6 million annually**
- **Investment** — **€15 million over the lifetime of the Plan (€2.5 million annually on average)**

FUNDING THE TRANSITION TO A CIRCULAR ECONOMY:

Investment of at least €6.6 million per annum or €39.6 million over the lifetime of the Plan.

Figure 6.1: Additional Annual Resource Funding Model

FUNDING MODEL:

Funding the additional resources to accelerate the transition to the circular economy will require investment from central and local government as well as the private sector.

Table 6.1: Additional Resources to deliver a Transition to a Circular Economy (€million)

Source	National		Regional		Local	
Central Government	Waste Prevention	€2.67	Waste Enforcement Regional Lead Authorities (WERLA)	€2.37	Enforcement Initiatives	€11.83
	Environmental Awareness	€1.86	Regional Waste Management Planning Offices (RWMPO)	€0.75	Landfill Closure and Aftercare	€2.80
	Anti-Litter Initiatives	€1.18				
	Waste Management Planning	€0.45				
	Total	**€6.16**	**Total**	**€3.12**	**Total**	**€14.63**
Additional Requirements of this Plan	**National Circularity Awareness**	**€1.0**	**Circular Planning Resources**	**€0.5**	**Circular Economy Officers**	**€2.0**
Local Government	National TransFrontier Shipment Office (NTFSO)	€0.76			Landfill Operation and Aftercare	€35.46
	National Waste Collection Permit Office (NWCPO)	€0.87			Recovery and Recycling Operations	€38.65
					Waste to Energy Operations	€3.49
					Provision of Waste Collection	€6.27
					Waste Enforcement	€37.79
					Waste Management Planning	€7.08
	Total	**€1.63**	**Total**	**€0**	**Total**	**€128.74**
Additional Requirements of this Plan	**Additional Circular Regulation**	**€0.6**			**Additional Circular Infrastructure**	**€2.5 million annually**

SUMMARY OF PART B DELIVERABLES

Volume III Part B, Organisation, Engagement and Resources, identifies a range of key deliverables which are required to enable policies and priority actions set out in **Volume II.**

Key Deliverables have been aligned with the key partners for the delivery of waste policy continuing the collaborative approach to the development of the Plan and emphasising the importance of co-ownership in the achievement of the Plan ambition and targets.

Appendix 11 of Volume IV provides a full index of the Key Deliverables under this Plan and maps these deliverables to the targets, policies and actions listed in **Volume II.**

Figure 6.2 illustrates where specific action (A) is required by a key partner or where support (S) is required to other key partners for the achievement of the key deliverables for organisation, engagement and resources.

Number	Deliverable	LGS		DECC		EPA	
		Action	Support	Action	Support	Action	Support
22	Local Authority Waste Programme Coordinating Group	Action					
23	OP1 Planning, Circularity and Infrastructure	Action					
24	OP2 Regulation and Enforcement	Action					
25	National Coordinating Group for Waste and the Circular Economy	Action		Action		Action	
26	Enabling Groups	Action		Action		Action	
27	Stakeholder Engagement	Action					
28	National Forum	Action		Action		Action	
29	Business Continuity	Action					
30	Street Cleaning /Litter Management	Action					
31	Landfill Aftercare	Action					
32	CAS Report	Action					
33	Enforcement Funding	Action					
34	Communications Strategy	Action		Action		Action	
35	Communications Strategy Implementation	Action		Action		Action	
36	Regional Circularity Resource	Action			Support		
37	Local Circularity Resources	Action			Support		
38	Regulation			Action			
39	Public Investment	Action					
40	Private Investment		Support				

Figure 6.2: Summary of Key Deliverables for Part B

PART C:

IMPLEMENTATION, MONITORING AND OVERSIGHT

7 IMPLEMENTATION STRATEGY

7.1 Overview

The evaluation of RWMP (**Appendix 3 of Volume IV**) demonstrated that the implementation model of setting priority actions for the overall plan period worked successfully and progressed many policy actions. The evaluation also found that this approach to implementation lacked the flexibility to adapt to unforeseen or emerging issues and, as such, the impact of these issues was not captured fully in the evaluation process as it was limited to the evaluation of priority actions prescribed.

This Plan adopts a more dynamic implementation model which facilitates the implementation of priority actions identified while enabling responses to unforeseen or emerging issues through annual work plans.

The implementation of this Plan will be achieved through a series of annual work plans agreed by the LGS with the emphasis on priority actions identified in each focus area as set out in **Volume II** and Key Deliverables set out in this volume. Additional or adapted actions arising on an annual basis will be agreed for inclusion in the annual work plans by the sector.

This integrated approach to the implementation of the policies and priority actions in each of the focus areas identified will underpin the achievement of the ambition and targets set out in this Plan.

Volume II consists of 13 Core Policies, 16 Focus Areas and 73 Targeted Policy Areas which are fixed. There are 85 Priority Actions which may be adapted or developed to meet the challenges in the waste and circular economy sector.

Priority Actions to be delivered over the lifetime of this Plan will be continually assessed to establish a priority order for achievement and delivery.

7.2 STRATEGIC MULTI ANNUAL WORK PLAN

KEY DELIVERABLE 41
Strategic Multi Annual Work Planning

The LGS, DECC and EPA will produce a strategic multi-annual work plan through the recommended NCGWCE to ensure alignment of objectives, priorities and supports.

Chapter 4 of this volume addresses organisation and sets out key organisational deliverables. Key Deliverable 25 recommends the establishment of a National Coordinating Group for Waste and the Circular Economy (NCGWCE) consisting of the three key partners for the delivery of waste policy, the LGS, DECC and the EPA.

Strategic implementation planning will take place at this level to ensure that the objectives, priorities and supports of the key partners are aligned annually and multi annually.

The development of a collaborative Strategic Multi Annual Work Plan will also enable each of the three key partners to promote organisational priorities under separate policy documents. These include the WAPCE, the Climate Action Plan, the CES and the National Food Waste Prevention Roadmap for DECC, the CEP and the National Hazardous Waste Management Plan for the EPA and this Plan, including new targets, for the LGS. This approach also facilitates the collaborative examination of synergies between these policies whereby the implementation of the work plan may deliver multiple beneficial outcomes.

7.3 LOCAL GOVERNMENT SECTOR - ANNUAL WORK PLAN

KEY DELIVERABLE 42
LGS Annual Work Plan

The LAWPCG will consider the strategic multiannual work plan produced by the NCGWCE and produce an annual work plan for the sector.

The strategic multi annual work plan agreed by the NCGWCE will be considered by the Local Authority Waste Programme Coordinating Group (LAWPCG) and an annual work plan will be produced for the LGS. Pillar specific work plans will be produced by the Planning / Circular Economy Pillar (OP1) and the Regulation and Enforcement Pillar (OP2).

The development of pillar work plans will take account of Core and Targeted Policies and Priority Actions set out in **Volume II.**

Level One Priority Actions will be progressed by the Planning and Circularity Pillar while Level Five Priority Actions will be Progressed by the Regulation and Enforcement Pillar. Level Two to Level Four priority actions may be divided or shared across the pillars.

7.4 ORGANISATIONAL PILLAR WORK PLANS

KEY DELIVERABLE 43
Pillar 1 Annual Work Plan

The LGS Planning and Circularity Pillar will produce an annual work plan with emphasis on the acceleration of the transition to a circular economy.

Taking account of the Strategic Multi Annual Work Plan and the Local Authority Sector Annual Work Plan, the Planning and Circularity Pillar will also produce an annual work plan.

This work plan will take account of the Core and Targeted Policies and Priority actions set out in **Volume II** with a particular emphasis on the acceleration of the transition to a circular economy consistent with the overall ambition of this Plan. As noted, this work plan will be focussed on the Level One Priority Actions which predominately relate to awareness and engagement to promote behaviour change in addition to waste and circular planning.

KEY DELIVERABLE 44
Pillar 2 Annual Work Plan

The LGS Regulation and Enforcement Pillar will produce an annual work plan with emphasis on interventions that support the acceleration of the transition to a circular economy.

Taking account of the Strategic Multi Annual Work Plan and the Local Authority Sector Annual Work Plan, the Regulation and Enforcement Pillar will also produce an annual work plan.

This plan will take account of the Core and Targeted Policies and Priority actions set out in **Volume II Policy Responses & Actions** with a particular emphasis on interventions that support the acceleration of the transition to a circular economy consistent with the overall ambition of this Plan.

This Plan will retain a focus on the Level Five Priority Actions which predominately relate to enforcement.

The implementation of work plans may require the establishment of enabling groups within individual focus areas or across a number of focus areas. The establishment of enabling groups will be agreed by the LAWPCG. The work plans outlined above will consider and quantify the time required for the delivery of the plans together with the human and financial resources required.

DYNAMIC WORK PLANS:
With an evolving waste sector and a growing circular economy, the implementation of this Plan requires a flexible and dynamic approach which will be delivered through a series of coordinated annual work plans to retain consistency and direction for all stakeholders in achieving the ambition of this Plan.

7.5 WORK PLAN EVALUATION

KEY DELIVERABLE 45
Evaluate the impact of work plans on circularity and climate

The LGS will evaluate the impact of LGS work plans on circularity and climate action annually.

The impact of work plans on circularity and climate action will be evaluated annually. The evaluation will be carried out independently.

The evaluation of the work plans will inform the development of subsequent work plans and the monitoring arrangements outlined in **Chapter 8** of this volume will also contribute to the identification of new or emerging priorities.

The evaluation will be approved by the oversight group described in **Chapter 9** of this volume.

A written summary of the previous year's activity and dashboard of the previous year's priority actions and outcomes will be included in the annual programme for the subsequent year demonstrating the evolution and rationale underpinning the programme of work.

The first annual work plans under this Plan will be published following the making of this Plan. All subsequent work programmes or plans will be agreed in Quarter 1 of the relevant year.

DYNAMIC EVALUATION:
Independent annual evaluation of the delivery of work plans will aid in identifying regulatory or market barriers, risks and opportunities that may impact delivery and inform future work plans.

7.6 IMPLEMENTATION SUMMARY

Implementation of the policies, actions and deliverables of this Plan requires a suitable level of flexibility to respond to changing priorities, markets and unforeseen events. This dynamic approach will be implemented through an annual cycle of work planning and evaluation to allow for early intervention to resolve emerging issues with achieving the targets and ambition of the Plan. The flexibility and level of control available to the coordinating groups is required to maintain progress on the ambition of this Plan.

To ensure that work planning maintains a focus on the key priorities, the work plans will be devised on a tiered approach with the strategic plan for the National Coordinating Group for Waste and the Circular Economy informing the priorities and actions for the Local Authority Waste Programme Coordinating Group work plans. In turn, this work plan will then inform the development of the annual work plans for the two implementation pillars. This tiered approach will ensure that annual implementation is consistent and coordinated with the strategic partners and other stakeholders.

8 MONITORING

8.1 Overview

To ensure that the policies, actions and key deliverables of this Plan remain on track, a dynamic monitoring regime is essential. The previous RWMP were the first waste plans to set measurable indicators which were assessed annually and this approach will be continued in this Plan. This section sets out the monitoring arrangements for the Plan.

A number of key stakeholders are tasked with monitoring various waste and circular parameters of relevance to this Plan and these are outlined in the following sections. Core Policy CP11 seeks to further collaborate on monitoring with the commitment to 'Assist all stakeholders to ensure the availability of timely quality data and projections to inform policy development and to enable the monitoring of progress against policies and targets'.

It is intended to maintain and enhance current monitoring arrangements under this Plan and supplement as required for new monitoring datasets such as for reuse and repair as outlined in **Section 8.4.**

8.2 NATIONAL WASTE GENERATION

Section 52 of the EPA Act 1992, as amended requires the EPA to undertake 'the monitoring of the quality of the environment, including the establishment and maintenance of data bases of information related to the environment and making arrangements for the dissemination of such information and for public access thereto'.

As such, the EPA is responsible for collating and reporting national datasets including waste. The validated data presented on the EPA website[19] and periodically updated, as available, is considered the primary source of national waste statistics employed by all stakeholders.

Monitoring information collated by the EPA is used to inform reporting to the Commission and is gathered using metrics and units that align with EU requirements and limits (as specified in **Volume II Section 3.2).** As such, the generation rates (typically in tonnes), recycling rates, collection rates (both typically expressed as %) and other metrics generated by the EPA are directly comparable to the EU limits presented in this Plan.

KEY DELIVERABLE 46
Improve waste data quality and availability

The LGS including NWCPO and NTFSO will work with key partners DECC and EPA on the improvement of the quality and availability of waste data.

The validation of waste monitoring data is a time dependent process and there is a lag period between the reporting year and the date of reporting which can delay performance review and corrective action. The WAPCE has committed to establishing a working group to examine live reporting systems, such as in other Member States, and the feasibility of implementing similar systems in Ireland. Such a system would benefit the monitoring aspects under this Plan as robust data can be delivered in a more timely fashion.

Separate to the EPA, the NWCPO and NTFSO are also engaged in monitoring waste through the functions of these bodies as follows:

- The NWCPO is required to gather annual reporting data for waste statistics, from waste collectors and waste facilities permitted through the local authority consent process. While this information is a subset of the wider EPA reporting regime, this data provides early information to assist in tracking generation rates and capacity; and
- The NTFSO supervise and monitor all shipments of waste outside the State and again, while a subset of the EPA reporting, this monitoring information can offer an early indication of changing trends that are of value in tracking performance and needs.

It is proposed to retain all of the above reporting mechanisms to provide early and ultimately fully validated data to the RWMPO to track compliance with the EU and national targets in this Plan and the success of the specified policies and actions. The development of a live reporting system to generate validated data more promptly would be welcomed and would support earlier interventions where required.

MONITORING WASTE GENERATION:
This Plan endorses collaborative support to the EPA in the current (or any future live) reporting regime to enable the efficient and timely delivery of robust waste data which is essential to monitoring this Plan implementation.

8.3 TREATMENT CAPACITY

Under the previous plans from 2015 to date, the RWMPO have prepared a comprehensive quarterly report on infrastructure capacity to inform of market pressures early and allow for corrective actions to be undertaken. This reporting involves liaison with the final destination facilities (landfills and waste to energy plants), the cement kilns, the NTFSO and the EPA to gather the relevant statistics to prepare the quarterly reports. This monitoring regime considers key waste management aspects as follows:

- Generation rates which are based on early data responses or EPA validated data, where available, to assess trends in generation rates; and
- The capacity of the market to accept this waste stream given that all facilities have an annual cap imposed by the relevant consent.

KEY DELIVERABLE 47
Capacity Monitoring

The LGS will produce a quarterly capacity summary including rMSW and C&D Waste.

Originally the report focussed on MSW but more recently the report also reviews the construction and demolition waste trends and deficits and has started to track other waste streams such as medical waste.

This is a critical monitoring requirement that provides ongoing and up to date data on capacities and remains an important measure for continuation through this Plan.

The EPA and the NWCPO are also compiling a capacity register for the State which will list all consented waste treatment facilities, the nature of waste treated and the installed treatment capacity. Once established this database will be updated and maintained to account for new, modified or surrendered consents. This database will be critical to the local authority function on assessing capacity need to form policy, applications for development consent, contingency and emergency provision.

CAPACITY MONITORING:
In conjunction with the EPA generation data, this Plan supports the continued role of the RWMPO in tracking, reporting and projecting treatment capacities within the State to facilitate contingency planning and inform new development.

[19] Link: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/

8.4 MONITORING FOR NEW METRICS

The WAPCE and the Circular Economy Act calls for this Plan to include new targets for consumption, contamination, reuse, repair and remanufacture. In the absence of a comprehensive baseline for all targets, a bespoke monitoring regime is required to track compliance with these targets.

Volume II establishes the baseline values for resource consumption (Target 1A - as rMSW per person per annum, Target 1B as C&D waste per person per annum), contamination (Target 2B - as material compliance in the residual bin) and reuse (Target 3A – as reuse per person per annum).

A robust 2024 baseline is required for material compliance (contamination) in the dry recycling bin (Target 2A) and this will be addressed through mass balance analysis of inputs and outputs at Materials Recovery Facilities (MRFs) to confirm that a minimum of 90% of the materials collected in these bins are suitable for recycling.

Similarly, there is no baseline for repair/ remanufacturing per person (Target 4a) and a bespoke monitoring regime is required initially to establish a robust baseline and thereafter to set a suitably ambitious target to track future progress.

The following methodology will be undertaken:

1. An Enabling Group will be established under the national coordination group of the LGS, the EPA and DECC (the planned replacement of the National Coordination Committee for Waste Management Planning). This group will establish the terms of reference and timeframe for developing the national baseline and target for reuse, repair and remanufacturing. In addition, the spatial extent of the baseline phase will be determined to identify if the baseline will be at national level or taken as a sample of a suitably representative local authority or region.
2. Engagement with the EPA to coordinate any overlap in reuse monitoring as well as in developing suitable metrics and methods for national reporting for this Plan.
3. The CRNI and the Rediscovery Centre were involved in the development of the research report for the EPA on the development of the reuse target for Ireland. Lessons learned on data availability, suitable waste streams and scaling up this baseline to a national level for repair and remanufacturing will be invaluable to this task and direct engagement with these groups is proposed to inform this target evaluation.
4. The Commission methodology and the EPA research report on the streams that are suitable for measurement for reuse, present a possible subset that may be suitable for the development of a repair or remanufacturing target. Following engagement with the CRNI and Rediscovery Centre, the Enabling Group will identify the material streams to be included in the initial baseline.
5. At the outset, a limited baseline of one or two streams may be optioned to allow for establishment of a valid measurement model before adding additional streams. The potential streams to be included in the target development include the following and subsets of each may be further developed:
   - Textiles;
   - Electrical and Electronic Equipment;
   - Furniture; and
   - Construction Material and Products.
6. While growing in capacity and public awareness, the nature and extent of the repair and remanufacturing market in the State is largely unknown. To resolve this knowledge gap, an inventory of existing practitioners for the chosen material streams must be developed to allow for tracking of future compliance. This inventory will include a list of all practitioners and the relevant streams repaired by each practitioner.
7. Baseline data will be gathered over an agreed time (and seasonally adjusted as required) to allow for annualization of the individual and total streams repaired or remanufactured in the period.
8. Finally, the Enabling Group shall establish suitably ambitious targets for repair and remanufacturing in a format that allows for comparison with international best practice, e.g. target as kg per person per annum. These targets may be as a whole or may be developed as individual material stream targets.

Once the targets have been established, any enhancements to the above monitoring regime will be devised to facilitate the assessment of the impact of these activities for reporting to the EU.

The Commissions methodology on reuse requires three yearly reporting and the reporting frequency for the repair and remanufacturing targets will be aligned with this reporting frequency. A re-evaluation of the targets will be undertaken at these three yearly intervals to ensure that the ambition of this Plan may be suitably increased as the planned increase in reuse, repair, remanufacturing and other prevention mechanisms are realised.

Table 8.1 outlines the input parameters required and the relevant data sources to be employed to assist in the gathering of information for the ambition, goal and targets presented in this Plan.

KEY DELIVERABLE 48
Repair Enabling Group

The LGS and EPA will coordinate the establishment of a Repair enabling group to carry out the tasks to support the determination of sustainable repair targets.

8.5 REPORTING

MONITORING METRICS:
This Plan has introduced a series of novel targets for consumption, contamination, reuse, repair and remanufacturing that will require significant early implementation to establish robust data to evaluate performance.

During the RWMP, the RWMPO prepared annual reports on the implementation of the waste plans and on performance under each of the policy headings contained within those plans. In the 2021 Evaluation Report for implementation of the RWMP, it was recommended that consideration should be given to altering the frequency of reporting and/ or aligning the reporting schedule in parallel to the core statistics from the EPA and any new dynamic or live reporting and data management regime implemented under the WAPCE.

There is no live reporting system imminent at the time of publication of this Plan for consultation. Hence, it is proposed to maintain the annual monitoring regime for this Plan but the frequency of monitoring may be reviewed through the Plan period as required.

The key parameters to be included in the annual performance report are listed as follows:

- Level of compliance with the Plan Ambition and Supporting Targets;
- Level of compliance with the relevant EU Targets;
- Success in implementation of the Core Policies;
- Success in implementation of the Focus Area Target Policies and Priority Actions;
- Emerging issues requiring new or amended Priority Actions for subsequent annual work plans; and
- Any other matter for consideration in developing the annual work plan.

The report will be prepared during Q2 each year based on data for the previous calendar year for each of the above.

Table 8.1: Metrics to Support Tracking of the Ambition, Goal and National Targets

Parameter	Unit	Source
Ambition of this Plan: 0% Waste Growth		
Total Waste Generated	Tonnes	EPA Waste Statistics[20] (validated) with unvalidated NWCPO annual data to be employed to present interim indicators.
National Population	No. of inhabitants	CSO population estimate released annually[21]
Total Waste per Capita	Tonnes/person/annum	Above inputs
National Consumption Target 1A: Residual Municipal Waste		
Total Residual Municipal Waste	Tonnes	EPA Waste Statistics
National Population	No. of inhabitants	CSO population estimate released annually
National Consumption	Tonnes/person/annum	Above inputs
National Consumption Target 1B: Construction Materials		
Total Construction and Demolition Waste	Tonnes	EPA Waste Statistics
National Target 2A – Material Compliance for the Dry Recycling Bin		
Fraction dry recyclables in recycling bin	%	Aggregated mass balance calculations from MRFs to determine the fraction of unrecyclable materials accepted.
National Target 2B – Material Compliance for the Residual Bin		
Fraction materials appropriately placed in the residual bin	%	EPA municipal waste characterisation surveys of the household and commercial residual bins.
National Target 3A: Reuse per Capita		
Reuse Activity (per stream) and total	kg/person/annum	EPA Waste Statistics for reporting to the Commission
National Target 3B: Reuse Infrastructure		
Fraction of CAS with functioning reuse activity	%	Local Authority CAS register developed for this Plan
Fraction of Total Tier CAS with functioning reuse activity	%	Local Authority CAS register
National Target 4A: Repair and Remanufacturing Activity		
Repair/Remanufacturing Activity (per stream) and total	kg or tonnes	Developed under this Plan
National Population	No. of inhabitants	CSO population estimate released annually
National Repair/ Remanufacturing Activity	kg/person/annum	Above inputs
National Target 4B: Repair Collection		
Number of Repair Collections	Number/region	Local Authority register developed for this Plan

[20] Source: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/

[21] Source: https://www.cso.ie/en/statistics/population/populationandmigrationestimates/

KEY DELIVERABLE 49
Annual Reporting

The LGS will produce an annual report on the progress of the implementation of the plan including the evaluation of the impact of work plans on circularity and climate action.

8.6 MONITORING SUMMARY

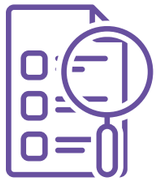
A robust and timely monitoring regime is essential to track the progress of delivery of this Plan and the relevant policies, actions and deliverables. While the EPA is the body with primary responsibility for monitoring waste streams and the RWMPO monitor treatment capacity, there is a need for all stakeholders to efficiently deliver accurate data to facilitate this reporting in line with Core Policy CP11 which seeks further collaboration on monitoring data.

This collaboration will also be essential to enable delivery of data to support the new monitoring regime required to track the ambition and targets set in this Plan.

These novel and circular metrics will be central to monitoring the transition to circularity under this Plan.

REPORTING COMPLIANCE AND PERFORMANCE:

Tracking the implementation of this Plan through quantitative targets and an annual performance report will enable the identification of emerging issues to inform the development of revised targets and/or subsequent work planning.



9 OVERSIGHT

9.1 Overview

The making of a waste management plan is an executive function and the WMA allows local authority Chief Executives to make a plan on an individual local authority basis or in cooperation with other local authorities.

This Plan will be made by all local authority Chief Executives simultaneously following the completion of their statutory responsibilities in the development of the Plan.

The representative body for City and County Chief Executives is the City and County Management Association (CCMA). The CCMA has a range of Sub Committees which oversee local authority functions. The Climate Action, Transport, Circular Economy and Networks (CATCEN) Committee oversees waste functions including the making of waste management plans.

The CCMA established a National Oversight Group to oversee the development and making of this Plan on behalf of the sector. The group consisted of representatives from the sector at various grades and engaged in a comprehensive review of all aspects of the Plan as it was being prepared.

While this Plan will be a single plan for the country, the existing regional organisation and governance arrangements will be retained during the implementation phase. Existing waste management lead authorities will be retained and established regional waste steering, operational and task groups will continue.

9.2 NATIONAL OVERSIGHT

There are a number of organisations in addition to the LGS who have an oversight function for implementation of waste management within the State, in particular DECC and the EPA.

DECC is responsible for providing the policy and legislative framework for the waste sector within the State. In particular, DECC is responsible for the Waste Action Plan for a Circular Economy, the Whole-of-Government Circular Economy Strategy and the National Food Waste Prevention Roadmap.

KEY DELIVERABLE 50
Oversight

The RWMPOs will participate in National Waste & CE Oversight Groups including the recommended NCGWCE and report to the CCMA CATCEN Committee on Plan progress and issues.

In relation to oversight of the sector, DECC is responsible for monitoring the performance of the established producer responsibility compliance schemes. DECC will also be responsible for facilitating the development of any new compliance schemes developed under the Waste Action Plan for a Circular Economy or the Single Use Plastics Directive.

The EPA has a statutory role under Section 63 of the EPA Act 1992, as amended to supervise the performance of local authorities of statutory duties to protect the environment including waste management.

This oversight may be undertaken through carrying out audits, such as to assess performance or to inspect annual monitoring plans for various environmental functions.

In addition, the EPA operates a Local Authority Performance Framework[22] to coordinate and focus the work of the local authorities to achieve consistent high performance throughout the country. The EPA publishes regular reports on the outcomes of these activities by all the local authorities around the country.

The National Coordination Committee for Waste Management Planning (NCCWMP) is a multi-agency group including DECC, the EPA and the LGS with a role to coordinate waste management planning within the State. As noted in **Chapter 4**, this Plan proposes the replacement of this group with a more focussed group to support the transition to a circular economy.

Within the LGS a new Local Authority Waste Programme Coordinator (LAWPC) was appointed in 2021 by the Local Government Management Agency (LGMA) to coordinate activities of the local government waste shared services. **Chapter 4** seeks to develop a national coordination group around this post to unify and align the LGS as a national group to deliver this national Plan.

Specifically in relation to enforcement, the work of the WERLA is overseen by a National Waste Enforcement Steering Committee (NWESC), jointly chaired by DECC and the EPA, which includes other national enforcement authorities.

This Plan proposes some revisions to the existing national oversight arrangements through the development of the national coordination group for the LGS to work with the LAWPC to provide unified and consistent local authority engagement with other stakeholders.

NATIONAL OVERSIGHT:

The National Coordinating Group for Waste and the Circular Economy will facilitate coordinated national oversight whereby the collaborative priorities and synergies of DECC, the EPA and the LGS may be delivered.

9.3 REGIONAL OVERSIGHT

Regional oversight of waste management planning and education is provided by the three RWMPOs whose primary role is to manage the implementation of the Plan through assistance and facilitation of local authorities in each waste region.

KEY DELIVERABLE 51
Regional Steering Groups

The RWMPOs will continue to report to regional steering groups to maintain connectivity with individual local authorities, elected members, and staff.

In relation to regional enforcement, the WERLA have responsibility for coordinating waste enforcement actions within regions, setting priorities and common objectives for waste enforcement to ensure consistent enforcement.

Under this Plan it is recommended to formalise the delineation of these separate planning and enforcement functions under two separate local authority pillars. It is considered that this separation of powers will allow for better cooperation regionally and nationally and an enhanced delivery of service.

REGIONAL OVERSIGHT:

The current regional oversight functions of the RWMPO and WERLA will be retained and enhanced through two distinct pillars to facilitate more focussed regional oversight.

[22] Link: https://www.epa.ie/our-services/compliance--enforcement/support-and-supervision-of-local-councils/la-performance/

9.4 OVERSIGHT SUMMARY

Chapter 4 of this volume prescribes the necessary internal and external (to the LGS) organisational changes required to deliver this Plan including the retention or enhancement of existing structures. One of the key functions of this revised organisational arrangement will be the oversight of delivery of this Plan both at national and regional level. This oversight function will be essential to ensure that the policy direction and performance of all stakeholders is unified and consistent with the ambition of this Plan.

SUMMARY OF PART C DELIVERABLES

Volume III Part C, Implementation Monitoring and Oversight, identifies a range of key deliverables which are required to enable policies and priority actions set out in **Volume II.**

Key Deliverables have been aligned with the key partners for the delivery of waste policy continuing the collaborative approach to the development of the Plan and emphasising the importance of co-ownership in the achievement of the Plan ambition and targets.

Appendix 11 of Volume IV of this Plan provides a full index of the Key Deliverables under this Plan and maps these deliverables to the targets, policies and actions listed in **Volume II.**

Figure 9.1 illustrates where specific action (A) is required by a key partner or where support (S) is required to other key partners for the achievement of the key deliverables for implementation monitoring and oversight.

Number	Deliverable	LGS		DECC		EPA	
		Action	Support	Action	Support	Action	Support
41	Strategic Multi Annual Work Planning	Action		Action		Action	
42	LGS Annual Work Plan	Action					
43	Pillar 1 Annual Work Plan	Action					
44	Pillar 2 Annual Work Plan	Action					
45	Evaluate the impact of work plans on circularity and climate impact	Action					
46	Improve waste data quality and availability		Support		Support		Support
47	Capacity Monitoring	Action					
48	Repair Enabling Group	Action		Action			
49	Annual Reporting	Action					
50	Oversight		Support				
51	Regional Steering Groups	Action					

Figure 9.1: Summary of Key Deliverables for Part C

SUMMARY OF THE DELIVERY ROADMAP

This is **Volume III**, the Delivery Roadmap, for the National Waste Plan for a Circular Economy 2024-2030 and sets out the requirements from key partners and stakeholders to achieve the ambition, targets, policies and actions presented in Volume II together with Key Deliverables (KD) which, when taken together, provide a route to the achievement of the Plan ambition and targets.

The key deliverables identified are aligned to the key partners for the delivery of policy and responsibility is assigned for each of the key deliverables identified. **Appendix 11 of Volume IV** provides a full index of the Key Deliverables under this Plan and maps these deliverables to the targets, policies and actions listed in **Volume II.**

Population and economic growth are predicted to increase the generation of waste through the Plan period. While the interventions cited in this Plan, the WAPCE and the Circular Economy Act can help curb the generation of wastes, the underlying trend is for an increase in waste generation and the primary focus on waste prevention is through the delivery of real behaviour change. In addition the following specific interventions are essential for delivery to aid in curbing generation rates:

- Successful delivery of the targets under the National Food Waste Prevention Roadmap 2023-2025 (KD1);
- Implementation of the incentivised charging regime for commercial municipal waste (KD2); and
- Implementation of the national Regulation 27 decision for greenfield soil and stone (KD7),

Like prevention, there are a number of interventions (such as the Recovery Levy, KD5) that may increase the national recycling rate. Depending on the success of the planned interventions, the national recycling rate may be increased by a minimum of 4% and a maximum of 9% with a potential rate of close to 50% by the end of the Plan period in 2030. This analysis suggests that with the assumed impact of the above interventions, the State will not reach the national recycling targets for 2025, 2030 and 2035 without further interventions.

To enable the long term transition to a circular economy, this Plan has anticipated the need for delivery of a series of infrastructural requirements to resolve shorter term capacity issues and to encourage longer term higher tier waste and resource infrastructure (KD11 to KD21).

The Plan sets out a series of recommended internal and external organisational arrangements to respond to the challenges identified in **Volume II.** Delivery of the recommended arrangements will ultimately inform the process of review of shared services internally within the LGS, which will determine the preferred organisational structure to maintain the sectors response to the waste and circularity challenge.

This Plan recommends that a Local Authority Waste Programme Coordinating Group is established to coordinate the functions of the existing shared services arrangements, together with the waste functions of individual local authorities (KD22).

The recommended establishment of the National Coordinating Group for Waste and the Circular Economy (KD15) will ensure that the key partners in the planning and regulation of the market (LGS, DECC and EPA) will have an agreed platform on priorities and programmes over the life of the Plan.

To ensure business continuity in the delivery of the local authority waste function, continued investment from local and central government will be required of the order of circa €300 million per annum (KD29). However, the Plan commits the LGS to measures and strategies to mitigate the current expenditure deficits identified (KD30 to 33).

The Plan also presents the additional resources required to accelerate the transition to a circular economy committed to within the Plan. The quantified additionality equates to at least €6.6 million per annum or €39.6 million over the lifetime of the Plan (KD34 to 39).

Implementation, monitoring and oversight of the policies, actions and deliverables of this Plan requires a suitable level of flexibility to respond to changing priorities, markets and unforeseen events. This dynamic approach will be implemented through an annual cycle of work planning (KD41 to 44) and evaluation to allow for early intervention to resolve emerging issues with achieving the targets and ambition of the Plan (KD45).

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MANAGEMENT
PLANNING OFFICES