



Rialtas Áitiúil Éireann  
Local Government Ireland

# NATIONAL WASTE MANAGEMENT PLAN

## FOR A CIRCULAR ECONOMY 2024-2030



VOLUME IV  
SUPPORTING DOCUMENTATION

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## APPENDIX 1

### Glossary and Abbreviations



# Abbreviations

Abbreviation	Meaning
<b>AA</b>	Appropriate Assessment
<b>ABP</b>	An Bord Pleanála
<b>ACR</b>	Association for Cities and Regions
<b>AD</b>	Anaerobic Digestion
<b>ADI</b>	Anti-Dumping Initiative
<b>ATF</b>	Authorised Treatment Facility
<b>CAP</b>	Climate Action Plan
<b>CAS</b>	Civic Amenity Site
<b>CATCEN</b>	Climate Action, Transport, Circular Economy, and Networks
<b>CCMA</b>	County and City Management Association
<b>CE</b>	Circular Economy
<b>CEAP</b>	Circular Economy Action Plan
<b>CEIGS</b>	Circular Economy Innovation Grant Scheme
<b>CEP</b>	Circular Economy Programme
<b>CES</b>	Whole of Government Circular Economy Strategy
<b>C&amp;D</b>	Construction and Demolition
<b>CMEx</b>	Construction Material Exchange Platform
<b>CMU</b>	Circular Material Use
<b>CoR</b>	Certificate of Registration
<b>CPI</b>	Consumer Price Index
<b>CRNI</b>	Community Resources Network Ireland
<b>CSO</b>	Central Statistics Office
<b>DAFM</b>	Department of Agriculture, Food and the Marine
<b>DECC</b>	Department of the Environment, Climate and Communications
<b>DHLGH</b>	Department of Housing, Local Government and Heritage
<b>DMC</b>	Domestic Material Consumption
<b>DRS</b>	Deposit Return Scheme
<b>EAO</b>	Environmental Awareness Officer
<b>ECHA</b>	European Chemicals Agency
<b>EDEN</b>	Environmental Data Exchange Network
<b>EGD</b>	European Green Deal
<b>EIT</b>	European Institute of Innovation and Technology
<b>ELVs</b>	End-of-Life Vehicles
<b>ELVES</b>	ELV Environmental Services CLG
<b>EoW</b>	End-of-Waste
<b>EPA</b>	Environmental Protection Agency
<b>EPR</b>	Extended Producer Responsibility

Abbreviation	Meaning
<b>ERP</b>	European Recycling Platform
<b>EU</b>	European Union
<b>FTR</b>	Full Time Resource
<b>GDP</b>	Gross Domestic Product
<b>GES</b>	Good Environmental Status
<b>GHG</b>	Greenhouse Gas
<b>GNI</b>	Gross National Income
<b>GPP</b>	Green Public Procurement
<b>GVA</b>	Gross Value Added
<b>IBA</b>	Incinerator Bottom Ash
<b>ICT</b>	Information and Communications Technology
<b>IE</b>	Industrial Emissions
<b>IFFPG</b>	Irish Farm Film Producers Group
<b>IPC</b>	Integrated Pollution Control
<b>IWMA</b>	Irish Waste Management Association
<b>KIC</b>	Knowledge and Innovation Community
<b>LGS</b>	Local Government Sector
<b>LAWPC</b>	Local Authority Waste Programme Coordinator
<b>LAWPCG</b>	Local Authority Waste Programme Coordinating Group
<b>LGMA</b>	Local Government Management Agency
<b>LoW</b>	List of Waste
<b>MDR</b>	Mixed Dry Recyclables
<b>MRF</b>	Material Recovery Facilities
<b>MSW</b>	Municipal Solid Waste
<b>MSFD</b>	Marine Strategy Framework Directive
<b>NCCWMP</b>	National Coordination Committee for Waste Management Planning
<b>NCGWCE</b>	National Coordinating Group for Waste and the Circular Economy
<b>NDP</b>	National Development Plan
<b>NFWPR</b>	National Food Waste Prevention Roadmap
<b>NHWMP</b>	National Hazardous Waste Management Plan
<b>NI</b>	Northern Ireland
<b>NIS</b>	Natura Impact Statement
<b>NMPF</b>	National Marine Planning Framework
<b>NPF</b>	National Planning Framework
<b>NPSB</b>	National Policy Statement on the Bioeconomy
<b>NTFSO</b>	National TransFrontier Shipment Office

## Abbreviations (Cont'd)

Abbreviation	Meaning
<b>NWCPO</b>	National Waste Collection Permit Office
<b>NWESC</b>	National Waste Enforcement Steering Committee
<b>NWPP</b>	National Waste Prevention Programme
<b>NWSMP</b>	National Wastewater Sludge Management Plan
<b>OECD</b>	Organisation for Economic Cooperation and Development
<b>PET</b>	Polyethylene Terephthalate
<b>PfG</b>	Programme for Government
<b>PRI</b>	Producer Responsibility Initiative
<b>PTU</b>	Pay-to-Use
<b>RDF</b>	Refuse Derived Fuel
<b>REACH</b>	Registration, Evaluation, Authorisation and Restriction of Chemicals
<b>REO</b>	Resource Efficiency Officers
<b>rMSW</b>	Residual Municipal Solid Waste
<b>RoI</b>	Republic of Ireland
<b>RSES</b>	Regional Spatial and Economic Strategies
<b>RWMP</b>	Regional Waste Management Plans
<b>RWMPO</b>	Regional Waste Management Planning Offices
<b>SCIP</b>	Substances of Concern In Articles or in complex objects (Products)
<b>SDG</b>	Sustainable Development Goal
<b>SEA</b>	Strategic Environmental Assessment
<b>S.I.</b>	Statutory Instrument
<b>SLF</b>	Solvent Liquid Fuel
<b>SMP</b>	Suspected Major Producers
<b>SRF</b>	Solid Recovered Fuel
<b>SUP</b>	Single Use Plastics
<b>SVHC</b>	Substances of Very High Concern
<b>TPPFG</b>	Tobacco Filter Product Plastic Group CLG
<b>UN</b>	United Nations
<b>WFD</b>	Waste Framework Directive
<b>WAPCE</b>	Waste Action Plan for a Circular Economy 2020-2025
<b>WCP</b>	Waste Collection Permit
<b>WERLA</b>	Waste Enforcement Regional Lead Authorities
<b>WFD</b>	Waste Framework Directive
<b>WFP</b>	Waste Facility Permit
<b>WMA</b>	Waste Management Act
<b>WTE</b>	Waste to Energy
<b>WWEPP</b>	Water, Waste, Environment and Emergency Planning

## Glossary

Term	Definition or Meaning
<b>Aftercare</b>	In relation to a facility which has been used for the purpose of waste recovery or disposal, any measures that are necessary to be taken in relation to the facility for the purpose of preventing environmental pollution following the cessation of the activity in question at the facility.
<b>Anaerobic Digestion</b>	The biological decomposition of biowaste in the absence of oxygen and under controlled conditions in order to produce biogas and digestate.
<b>Annual Report (AR)</b>	Waste collection permit (WCP) and waste facility permit (WFP) holders are required to submit an Annual Report (AR) to the National Waste Collection Permit Office (NWCPO) under condition of permit.
<b>Annual Environmental Report (AER)</b>	An Annual Environmental Report (AER) must be submitted to the EPA each year by companies with either waste or Integrated Pollution Prevention and Control licences, providing summary information on all aspects of the environmental performance of the licensed facility, e.g. data on emissions to air and water, waste management, resource consumption, objectives and targets, ambient monitoring and complaints. AERs are made publicly available on the EPA website.
<b>Authorised person</b>	A person who is appointed in writing by— (a) the Minister, (b) a local authority, (c) the Agency, (d) the Commissioner of the Garda Síochána (or a member of the Garda Síochána nominated by that Commissioner for the purposes of appointing authorised persons under this Act), or (e) such other person as may be prescribed.
<b>Authorised Waste Collector</b>	A holder of a waste collection permit that is in force.
<b>Backfilling</b>	Any recovery operation where suitable non-hazardous waste is used for purposes of reclamation in excavated areas or for engineering purposes in landscaping. Waste used for backfilling must substitute non-waste materials, be suitable for the aforementioned purposes, and be limited to the amount strictly necessary to achieve those purposes.
<b>Best available techniques</b>	Best available techniques as defined in Article 2(12) of Directive 2008/1/EC.
<b>Biodegradable</b>	In the context of waste, this means waste that is capable of undergoing anaerobic or aerobic biological decomposition, such as food and garden waste, paper and cardboard.
<b>Biodegradable Municipal Waste (BMW)</b>	The biodegradable component of municipal waste; this does not include bio stabilised waste. Biodegradable municipal waste is typically composed of food and garden waste, wood, paper, cardboard and textiles.
<b>Biological treatment</b>	Involves composting, anaerobic digestion, mechanical/ biological treatment or any other process for stabilising and sanitising biodegradable waste.
<b>Bio-stabilised residual waste (BMW)</b>	Residual BMW that has been treated to achieve an EPA approved biodegradability stability standard prior to landfilling or alternative agreed use.
<b>Bio-waste</b>	Biodegradable garden and park waste, food and kitchen waste from households, offices, restaurants, wholesale, canteens, caterers and retail premises and comparable waste from food processing plants.
<b>Bring Banks</b>	These are facilities in which members of the public deposit recyclable waste materials such as glass, metals and plastics in material specific receptacles for subsequent collection and delivery to material recovery facilities.



## Glossary (Cont'd)

Term	Definition or Meaning
<b>Certificate of Registration (CoR)</b>	A certificate issued under Article 37 of the Waste Management (Facility Permit and Registration) Regulations 2007 and, for the purposes of these Regulations, shall include a 'registration certificate' which has been granted as a waste authorisation by the Agency or, as the case may be, a local authority in accordance with the provisions, which regulates the reception, storage (including temporary storage), segregation, sorting or repackaging of waste.
<b>Circular Economy</b>	Circular economy means an economic model and the policies and practices which give effect to that model in which— (a) production and distribution processes in respect of goods, products and materials are designed so as to minimise the consumption of raw materials associated with the production and use of those goods, products and materials, (b) the delivery of services is designed so as to reduce the consumption of raw materials, (c) goods, products and materials are kept in use for as long as possible thereby further reducing the consumption of raw materials and impacts harmful to the environment, (d) the maximum economic value is extracted from goods, products, and materials by the persons using them, and (e) goods, products and materials are recovered and regenerated at the end of their useful life.
<b>Civic Amenity Sites (CAS or CA sites)</b>	A reception facility that enables householders to deposit a wide range of household waste including recyclable and non-recyclable materials, bulky household waste and certain categories of household hazardous waste.
<b>Co-incineration</b>	Involves plants where waste is used as a fuel or is disposed of at a plant along with other substances where energy generation or production may take place.
<b>Collection</b>	The gathering of waste, including the preliminary sorting and storage of waste for the purposes of transport to a waste treatment facility.
<b>Collection System</b>	A system of gathering, sorting or mixing of waste for the purpose of it being transported to a waste recovery or disposal facility.
<b>Commercial Waste</b>	Waste from premises used wholly or mainly for the purposes of a trade or business or for the purposes of sport, recreation, education or entertainment but does not include household, agricultural or industrial waste.
<b>Compliance Scheme</b>	Non-profit producer responsibility scheme that takes on the obligations of its producer members for the collection, treatment and recycling of Producer Responsibility Initiative waste.
<b>Compost</b>	The stable, sanitised and humus-like material rich in organic matter and free from offensive odours resulting from the composting process of separately collected biowaste.
<b>Composting</b>	The autothermic and thermophilic biological decomposition of separately collected biowaste in the presence of oxygen in order to produce compost.
<b>Construction and Demolition Waste</b>	Waste generated by construction and demolition activities.

Term	Definition or Meaning
<b>Disposal</b>	(a) Any operation which is not recovery even where the operation has as a secondary consequence the reclamation of substances or energy, and (b) without prejudice to the generality of paragraph (a), includes the disposal operations listed in the Third Schedule, and "waste disposal activity" shall be construed accordingly.
<b>EIA Directive</b>	Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014.
<b>Extended Producer Responsibility Scheme</b>	A set of measures taken by Member States to ensure that producers of products bear financial responsibility or financial and organisational responsibility for the management of the waste stage of a product's life cycle.
<b>Facility</b>	In relation to the recovery or disposal of waste, any site or premises used for such purpose.
<b>Food Waste</b>	All food as defined in Article 2 of Regulation (EC) No 178/2002 of the European Parliament and of the Council that has become waste.
<b>Gross Domestic Product</b>	The total output of the economy in a period, i.e. the value of work done by employees, companies and self-employed persons.
<b>Hazardous waste</b>	Wastes that have the potential to cause harm to human health or the environment. Any Waste which displays one or more of the hazardous properties listed in Annex III of the Waste Framework Directive (2008/98/EC) is defined as a hazardous waste.
<b>Household Waste</b>	Waste produced within the curtilage of a building or self-contained part of a building used for the purposes of living accommodation.
<b>Incineration</b>	A process by which heat is applied to waste in order to reduce its bulk, prior to final disposal which may or may not involve energy recovery.
<b>Industrial Emissions Directive</b>	Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (Recast).
<b>Industrial Waste</b>	Includes waste produced or arising from manufacturing or industrial activities or processes.
<b>Inert Waste</b>	Waste that does not undergo any significant physical, chemical or biological transformations. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in any way likely to give rise to environmental pollution or harm human health.
<b>Integrated Waste Management Facility</b>	In the context of this Plan, this is a licence that combines a landfill and other waste infrastructure such as civic amenity site, transfer station, composting or other treatment facilities.
<b>Kerbside collection</b>	A common term for the practice of collecting household or commercial waste directly from its source, often, though not necessarily, from the pavement or front door. This service to customers generally entails waste collectors using separate bins to collect waste streams (usually dry recyclables, organic waste, and residual waste).

## Glossary (Cont'd)

Term	Definition or Meaning
<b>Land</b>	Includes any subsoil thereunder and structure thereon and land covered with water (whether inland or coastal).
<b>Landfill</b>	A waste disposal site for the deposit of waste onto or into land (i.e. underground), including: (a) internal waste disposal sites (i.e. landfill where a producer of waste is carrying out its own waste disposal at the place of production), and (b) a permanent site (i.e. more than one year) which is used for temporary storage of waste, but excluding (c) facilities where waste is unloaded in order to permit its preparation for further transport for recovery, treatment or disposal elsewhere, and (d) storage of waste prior to recovery or treatment for a period less than three years as a general rule, or (e) storage of waste prior to disposal for a period less than one year.
<b>Landfill Directive</b>	The Directive which aims, by means of stringent operational and technical requirements on the landfilling of waste, to implement measures, procedures and guidance to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, ground water, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, during the whole life cycle of the landfill.
<b>Landfill levy</b>	An additional environmental levy that is paid on top of normal gate fees by any private contractor or local authority that wishes to dispose of waste through a landfill site. The landfill levy is collected through landfill operators and forms part of a policy aimed at providing more incentives for reuse and recycling of waste.
<b>Landfilling</b>	The disposing of waste at a waste disposal facility used for the depositing of waste onto or under the land.
<b>Leachate</b>	Any liquid percolating through deposited waste and emitted from or contained within a landfill.
<b>Local authority</b>	In the case of a county borough, the corporation of the county borough, and in the case of any other administrative county, the council of the county.
<b>Material Recovery</b>	Any recovery operation, other than energy recovery and the reprocessing into materials that are to be used as fuels or other means to generate energy. It includes, inter alia, preparing for re-use, recycling and backfilling.
<b>Material Recovery Facilities (MRF)</b>	Facilities where recyclables are sorted into specific categories and processed, or further transported to processors for remanufacturing.
<b>Metric tonnes</b>	Expressed as "t" throughout this Plan. Mt = million tonnes.
<b>Monitoring</b>	Includes the inspection, measurement, sampling or analysis, whether periodically or continuously, for the purpose of the Waste Management Act 1996, as amended, of waste, a premises at which waste is produced, or a facility at which waste is held, recovered or disposed of, and of any emissions therefrom, or any environmental medium which is affected by or which, in the opinion of the local authority concerned or the Agency may be affected by, such emissions.

Term	Definition or Meaning
<b>Municipal solid waste (MSW) or municipal waste or municipal managed waste (MMW)</b>	Household waste as well as commercial and other waste that, because of its nature or composition, is similar to household waste. It excludes municipal sludges and effluents. In the context of this report municipal waste consists of three main elements – household, commercial (including non-process industrial waste), and street cleansing waste (street sweepings, street bins and municipal parks and cemeteries maintenance waste, litter campaign material).
<b>Municipal Waste</b>	(a) mixed waste and separately collected waste from households, including paper and cardboard, glass, metals, plastics, bio-waste, wood, textiles, packaging, waste electrical and electronic equipment, waste batteries and accumulators, and bulky waste, including mattresses and furniture; (b) mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households; Municipal waste does not include waste from production, agriculture, forestry, fishing, septic tanks and sewage network and treatment, including sewage sludge, end-of-life vehicles or construction and demolition waste. This definition is without prejudice to the allocation of responsibilities for waste management between public and private actors.
<b>Non-Hazardous Waste</b>	Waste which is not covered by the definition of hazardous waste.
<b>Non-Kerbside Household MSW Collection</b>	Bulky municipal waste collected by authorised collectors, waste brought by householders to landfills, bring banks, civic amenity facilities and WEEE and batteries brought to retailers and collected on specific collection days.
<b>Organic waste</b>	Biodegradable food, garden and landscaping waste, and where the context permits, will also include industrial organic sludges (e.g. from the food and drink production sector).
<b>Packaging</b>	Any material, container or wrapping, used for or in connection with the containment, transport, handling, protection, promotion, marketing or sale of any product or substance, including such packaging as may be prescribed.
<b>Pay as you Throw</b>	A scheme in which waste fees paid by users are modulated according to the amount of mixed waste delivered to the waste management system.
<b>Pay-to-use (PTU)</b>	Waste compactor units that members of the public can pay to use to deposit their municipal residual waste, which are primarily located on garage forecourts and parking areas of supermarkets and other retail outlets.
<b>Planning Authority</b>	This has the meaning assigned to it by the Local Government (Planning and Development) Act, 1963.
<b>Premises</b>	Includes any messuage, building, vessel, structure or land (whether or not there are structures on the land and whether or not the land is covered with water), and any plant or vehicles on such land, or any hereditament of any tenure, together with any out-buildings and curtilage.
<b>Preparing for Re-Use</b>	Checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.



## Glossary (Cont'd)

Term	Definition or Meaning
<b>Pre-Treatment</b>	The processing of waste which still results in a waste that subsequently undergoes other waste recovery or disposal treatment. Pre-treatment activities include operations such as "dismantling, sorting, crushing, compacting, palletising, drying, shredding, conditioning, repackaging, separating, blending or mixing if the material or substance resulting from such operations is still waste". These activities do not sit on any particular rung of the waste hierarchy and instead can be regarded as "precursors" to specific types of treatment.
<b>Prevention</b>	Measures taken before a substance, material or product has become waste, that reduce: (a) the quantity of waste, including through the re-use of products or the extension of the life span of products; (b) the adverse impacts of the generated waste on the environment and human health; or (c) the content of hazardous substances in materials and product.
<b>Product</b>	Includes any naturally occurring or manufactured thing.
<b>Proximity Principle</b>	The principle set out in the EU Framework Directive (91/156/EEC) whereby member states should establish a network enabling waste to be disposed of in one of the nearest appropriate installations, by means of the most appropriate methods and technologies to ensure a high level of protection for the environment and for public health.
<b>Recovery</b>	Any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Additionally, without prejudice to the generality of the previous sentence, includes the recovery operations listed in the Fourth Schedule, and "waste recovery activity" shall be construed accordingly.
<b>Recyclables</b>	Waste materials that may be subjected to any process or treatment to make them reusable in whole or in part.
<b>Recycling</b>	Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.
<b>Refuse-derived fuel (RDF)</b>	Fuel produced from waste through a number of processes such as mechanical separation, blending and compressing to increase the calorific value of the waste. Such waste-derived fuels can comprise paper, plastic and other combustible wastes and can be combusted in a waste-to-energy plant, cement kiln or industrial furnace.
<b>Residual municipal waste</b>	The fraction of municipal waste remaining after the source separation of municipal waste fractions, such as food and garden waste, packaging, paper and cardboard, metals and glass, which is usually unsuitable for recovery or recycling.
<b>Residual waste</b>	The fraction of collected waste remaining after treatment and/or diversion steps, which generally requires further treatment or disposal.
<b>Re-use</b>	Any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.
<b>Separate collection/ source segregation</b>	The collection where a waste stream is kept separately by type and nature so as to facilitate a specific treatment.

Term	Definition or Meaning
<b>Solid recovered fuel (SRF)</b>	High-quality fuel derived from mechanically processing residual waste, which must comply with the international standard, CEN/TC 343 (meet minimum standards for moisture content, particle size, metals, chloride, chlorine content and calorific value).
<b>The Agency</b>	The Environmental Protection Agency established under Section 19 of the Environmental Protection Agency Act 1992.
<b>Thermal recovery</b>	Thermal recovery as described in the plan is a thermal based operation which sits on the "other" recovery tier of the waste management hierarchy. It is a process where the principal means is to use waste as a fuel to generate energy. It is a waste management operation with energy recovery classified as R1 in Annex II of the Waste Framework Directive. Thermal recovery applications include waste-to-energy technologies such as incineration, pyrolysis and gasification and also cover certain production processes which involve the co-combustion of wastes, thus substituting fuels, in cement kilns or industrial furnaces.
<b>Treatment</b>	Includes, in relation to waste, any manual, thermal, physical, chemical or biological processes that change the characteristics of waste in order to reduce its mass, or hazardous nature or otherwise, to facilitate its handling, disposal or recovery.
<b>Treatment facilities</b>	Facilities where waste undergoes thermal, physical, chemical or biological processes that change its characteristics in order to reduce its volume or hazardous nature or facilitate its handling, disposal or recovery.
<b>Unmanaged waste</b>	Estimate of the quantity of waste generated but not captured via one of the kerbside or non-kerbside collection systems.
<b>Upcycling</b>	Upcycling is taking an item that is no longer needed or wanted and giving it new life as something that is either useful or creative.
<b>Waste</b>	Any substance or object which the holder discards or intends or is required to discard.
<b>Waste Collection Permit</b>	A permit granted by the NWCPO on behalf of the local authorities for the collection of waste under the Waste Management (Collection Permit) Regulations 2007, as amended.
<b>Waste Directive</b>	Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.
<b>Waste electrical and electronic equipment (WEEE)</b>	Refers to electrical and electronic equipment which is waste within the meaning of Article 3(a) of the Waste Directive 2008/98/EC, including all components, subassemblies and consumables which are part of the product at the time of discarding.
<b>Waste Facility Permit</b>	A permit issued by a local authority to a facility for the transfer, storage or treatment of waste under the Waste Management (Facility Permit and Registration) Regulations 2007, as amended.
<b>Waste Hierarchy</b>	Waste hierarchy is the cornerstone of European (and Irish) waste policies and legislation. Its primary purpose is to minimise adverse environmental effect from waste and to increase and optimise resource efficiency in waste management and policy. The hierarchy under the Waste Framework Directive is a priority order for the management of waste and prioritises the ways of dealing with waste as follows (1) prevention; (2) preparing for reuse; (3) recycling; (4) other recovery; and (5) disposal.



## Glossary (Cont'd)

Term	Definition or Meaning
<b>Waste Management</b>	The collection, transport, recovery (including sorting), and disposal of waste, including the supervision of such operations and the aftercare of disposal sites, and including actions taken as a dealer or broker.
<b>Waste Management Facility</b>	A site or premises used for the recovery or disposal of waste.
<b>Waste Management Plans</b>	Statutory waste management plans implemented on a regional basis in Ireland since 2001.
<b>Waste Oils</b>	Any mineral or synthetic lubrication or industrial oils which have become unfit for the use for which they were originally intended, such as used combustion engine oils and gearbox oils, lubricating oils, oils for turbines and hydraulic oils.
<b>Waste Producer</b>	Anyone whose activities produce waste or who carries out pre-processing, mixing or other operations resulting in a change in the nature or composition of such waste.
<b>Waste Service</b>	Any service, facility, approval or other thing which a local authority may or is required to render, supply, grant, issue or otherwise provide in the performance of any of its functions under the Waste Management Act 1996, as amended, to any person or in respect of any premises.
<b>Waste to Energy Plant</b>	A thermal recovery plant where waste undergoes thermal treatment with a recovery of energy by combustion or by synthesis gas production followed by combustion. The energy that is recovered is often used to supply electricity and or heat.



## APPENDIX 2

Section 22 of the Waste Management Act



## SECTION 22 OF THE WASTE MANAGEMENT ACT 1996, AS AMENDED

Waste management plans.

22.—(1) In this section—

“relevant period” means the period beginning on the date of making of the waste management plan concerned or, as the case may be, the date on which the last evaluation of the said plan under subsection (4) was completed and ending on the date on which the local authority or authorities concerned expect to complete or, as may be appropriate, to next complete, an evaluation of the plan under that subsection;

“revise”, in relation to a waste management plan, includes a review of the plan;

“waste management plan” includes, where the context admits, a replacement waste management plan under subsection (4)

(2)(a) Subject to subsection (3) and section 24, in order that plans in combination cover the entire geographical territory of the State, each local authority shall make a waste management plan for non-hazardous waste in relation to its functional area.

(b) The Agency, shall, in accordance with section 26, establish such a plan for the State in respect of hazardous waste.

(c) The plans shall—

- (i) lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use,
- (ii) be in accordance with the waste hierarchy set out in section 21A,
- (iii) meet the protection of human health and the environment obligations set out in section 32(1), and
- (iv) meet the principles of self-sufficiency and proximity set out in section 37A.

(d) Waste management plans and the hazardous waste management plan in existence at the commencement of the Regulations of 2011 shall be evaluated by 31 December 2012 and, consequent on any such evaluation, where appropriate, be revised to be brought into line with the requirements of the Waste Directive.

(3) Two or more local authorities may, in lieu of each of them making a waste management plan, jointly make a plan (in this Act also referred to as a “waste management plan”) as respects their functional areas with regard to the matters specified in subsection (2).

(4) A local authority or, in the case of a waste management plan under subsection (3), the 2 or more local authorities concerned, shall ensure that a waste management plan made by it or them from time to time as occasion may require is evaluated at least once in each period of 6 years after the date of making of the plan and may, consequent on such an evaluation, where appropriate, make, in accordance with Article 9 of the Waste Directive, Regulation 31 of the Regulations of 2011 and section 23, any revisions to the plan or replace it with a new waste management plan as it or they thinks or think fit.]

(5) A local authority shall, before it commences the preparation of any of the following, namely, a waste management plan under subsection (2) or (3), a revision of, or a replacement for, such a plan under subsection (4) or a replacement for such a plan in compliance with a requirement made by the Minister under section 24, cause notice of its intention to commence such preparation to be published in a newspaper circulating in its functional area and such a notice shall state that written representations in relation to the matter may be made to the local authority within a specified period, being a period of not less than 2 months from the date of publication of the notice.

(6)(a) A waste management plan shall—

- (i) set out an analysis of the current waste management situation in the geographical entity concerned (if regional, for example, for the region),
- (ii) set out the measures to be taken to improve environmentally sound preparing for re-use, recycling, recovery and disposal of waste, and
- (iii)(I) set out an evaluation of how the plan will support the implementation of the objectives and provisions of the Waste Directive,
- (II) set out such measures or arrangements as are to be taken or entered into by the local authority or local authorities, with a view to securing the objectives of the plan, and

(III) with regard to hazardous waste, cover the matters specified in subsection (8) in so far as they relate to its functional area.

(b) A waste management plan shall contain, as appropriate, and taking into account the geographical level and coverage of the planning area, at least the following:

(i)(I) the type, quantity and source of waste generated within the territory, the waste likely to be shipped from or to the national territory, and an evaluation of the development of waste streams in the future; and

(II) a requirement that, in order to fulfil this obligation, liaison shall be undertaken, as appropriate, with the Minister, the Agency, Dublin City Council and other relevant local authorities;

(ii) existing major disposal and recovery installations, including any special arrangements for waste oils, hazardous waste, waste containing significant amounts of critical raw materials, or waste streams addressed by specific Union legislation;

(iii) an assessment of the need for closure of existing waste installations, and for additional waste installation infrastructure in accordance with section 37A. The Minister shall ensure that an assessment of the investments and other financial means, including for local authorities, required to meet those needs is carried out. This assessment shall be included in the relevant waste management plans or in other strategic documents covering the entire territory of the State;

(iv) information on the measures to attain the objective laid down in Article 5(3a) of Directive 1999/31/EC or in other strategic documents covering the entire territory of the Member State concerned;

(v) an assessment of existing waste collection schemes, including the material and territorial coverage of separate collection and measures to improve its operation, of any derogations granted in accordance with Article 10(3) of the Waste Directive, and of the need for new collection schemes;

(vi) sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations, if necessary;

(vii) general waste management policies, including planned waste management technologies and methods, or policies for waste posing specific management problems;

(viii) measures to combat and prevent all forms of littering and to clean up all types of litter;

(ix) appropriate qualitative or quantitative indicators and targets, including in respect of any or all of the following:

(I) the quantity of generated waste and its treatment;

(II) municipal waste that is disposed of or subject to energy recovery;

(III) the use of products and materials that have been re-used, re-manufactured or repaired, or any combination thereof;

(x) information as respects the integration and implementation of measures consequential on, or incidental to, the requirements of section 27A in relation to waste prevention programmes;

(xi) the measures taken by the Minister to give effect to Article 22 of the Waste Directive in relation to bio-waste.]

(c) A waste management plan may contain, taking into account the geographical level and coverage of the planning area, the following:

(i) organisational aspects related to waste management including a description of the allocation of responsibilities between public and private actors carrying out the waste management;

(ii) an evaluation of the usefulness and suitability of the use of economic and other instruments in tackling various waste problems, taking into account the need to maintain the smooth functioning of the internal market;

(iii) the use of awareness campaigns and information provision directed at the general public or at a specific set of consumers.

(d) Waste management plans shall conform to the waste planning requirements laid down in Article 14 of European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste, and the strategy for the implementation of the reduction of biodegradable waste going to landfills, referred to in Article 5 of Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste as well as national legislation and policy on biodegradable waste.

(7) Without prejudice to the generality of subsection (6), a waste management plan shall, subject to such regulations as may be made by the Minister for the purposes of this section, include information on or otherwise have regard to—

(a) the policies and objectives, and the priorities respectively assigned to them, of the local authority or authorities concerned in relation to assisting the prevention and minimisation of waste and in relation to the management generally of activities carried on by it or them or other persons as respects the collection, recovery and disposal of waste within its or their functional area or areas;

(b) the measures which—

- (i) will be taken during the relevant period by the local authority or authorities concerned, and
- (ii) in so far as the local authority or authorities concerned can determine, will or may be taken during the relevant period by persons other than such authority or authorities,

for the purpose of preventing or minimising the production of waste;

(c) (deleted)

(d) (deleted)

(e) facilities, plant and equipment which the local authority or authorities concerned expect to be available or, in its or their opinion, will be required to be available for the collection, recovery or disposal of waste in its or their functional area or areas during the relevant period and matters relevant to the selection of sites in respect of facilities aforesaid;

(f) general requirements of a technical or other nature applicable to the collection, recovery and disposal of waste and the aftercare of facilities used for the disposal of waste;

(g) the steps to be taken generally by the local authority or authorities concerned to enforce the provisions of this Act in its or their functional area or areas;

(h) the identification of sites at which waste disposal or recovery activities have been carried on, the assessment of any risk of environmental pollution arising as a result of such activities, measures proposed to be taken, or, where such an assessment has already been made measures taken, in order to prevent or limit any such environmental pollution, the identification of necessary remedial measures in respect of such sites, and measures proposed to be taken, or, where such measures have already been identified, measures taken, to achieve such remediation, having regard to the cost-effectiveness of available remediation techniques;

(i) any incidental and ancillary matters;

(j) such other matters as may be prescribed.

(8) There shall be included in a waste management plan, but separate from the other information contained in the plan, information as respects the implementation of measures consequential on, or incidental to, the provisions of the hazardous waste management plan or any recommendations made by the Agency under section 26 (6).

(9) The Minister may make regulations relating to any matter to be set out or addressed in a waste management plan.

(10) (a) On and from the passing of the Waste Management (Amendment) Act, 2001, but without prejudice to paragraph (c), the duties of a local authority under this section with respect to the making of a waste management plan shall be carried out by the manager of the authority and, accordingly, the making of such a plan shall be an executive function.

(b) For the avoidance of doubt, the waste management plans to which paragraph (a) applies include such a plan which a local authority indicated its intention, before the passing of the Waste Management (Amendment) Act, 2001, to make jointly with one or more other local authorities but which plan it subsequently (but before the said passing) decided not to make.

(c) Where in the opinion of the manager of a local authority a waste management plan purporting to be made, before the passing of the Waste Management (Amendment) Act, 2001, by the authority jointly with one or more other local authorities is invalid because the decision of the authority purporting to make the plan, expressly or by implication, qualifies its assent to the plan—

(i) by making its assent to the plan subject to one or more conditions being satisfied, or

(ii) by the authority purporting to reserve to itself a power to vary the plan, otherwise than pursuant to the powers conferred on it in that behalf by this section, or

(iii) in any other respect whatsoever, the manager shall, not later than the date prescribed for the purposes of subsection (2), by order—

(I) declare that he or she is of that opinion, and

(II) make the said plan,

and the said plan, as so made, shall, accordingly, be deemed for all purposes to be the waste management plan made by the local authority, but without prejudice to any steps taken by that or any other local authority, before the date of the making of the said order, pursuant to the terms of the said plan as purported to be jointly made by those local authorities.

(d) On and from the commencement of section 26(2)(b) of the Protection of the Environment Act 2003, the evaluation, revision or replacement of a waste management plan shall be an executive function.

(e) (deleted)

(f) (deleted)

(g) A local authority shall not, by resolution, under section 3 or 4 of the City and County Management (Amendment) Act, 1955, or section 179 of the Planning and Development Act, 2000, give a direction that works not be proceeded with or require any act, matter or thing to be done or effected where the effect of such direction or requirement would be contrary to, or inconsistent with, any provision (including any objective contained therein) of a waste management plan or would limit or restrict the proper implementation of such a provision and any resolution purporting to be passed under the said section 3, 4 or 179 which contravenes this paragraph shall be void.

(10A) (a) The development plan for the time being in force in relation to the functional area of a local authority shall be deemed to include the objectives for the time being contained in the waste management plan in force in relation to that area.

(b)(i) In the event of there being a conflict between an objective deemed to be included in a development plan by virtue of paragraph (a) (the "first-mentioned objective") and an objective otherwise included in the development plan (the "second-mentioned objective"), the first-mentioned objective shall override the second-mentioned objective, irrespective of whether or not the development plan is subsequent to the waste management plan referred to in that paragraph.

(ii) A reference in subparagraph (i) to—

(I) an objective deemed to be included in a development plan by virtue of paragraph (a) shall be construed as including a reference to an objective deemed to be included in a development plan by virtue of this subsection before the amendment of it by section 26 of the Protection of the Environment Act 2003,

(II) an objective otherwise included in a development plan shall be construed as including a reference to an objective otherwise included in a development plan before the amendment of this subsection by that section 26.

(10AA) An application for permission under Part III of the Planning and Development Act 2000 shall not be refused by a planning authority or An Bord Pleanála solely on the ground that the development to which the application relates is not specifically referred to in the waste management plan in force in relation to the functional area of the planning authority if the planning authority or the Board, as the case may be, considers the development will facilitate the achievement of the objectives of that waste management plan.



(10B) (a) Where a planning authority proposes to grant permission under Part III of the Planning and Development Act, 2000, for development which is consistent with the provisions (including any objectives contained therein) of, and is necessary for the proper implementation of, the waste management plan in force in relation to the authority's functional area, but, in the opinion of the manager of the authority, would contravene materially any other objective of the development plan in force in relation to that area, the manager shall—

- (i) publish notice of the intention of the authority to grant the permission in one or more newspapers circulating in that area,
- (ii) give a copy of the notice to the applicant for permission and to any person who has made a submission or observation in writing in relation to the development to which the application relates in accordance with any regulations made under the Planning and Development Act, 2000.

(b) Any submission or observation in writing in relation to the making of a decision to grant the permission concerned which is received by the planning authority not later than 4 weeks after the publication of the notice in accordance with paragraph (a) shall be considered by the manager of the authority.

(c) Following consideration of any submissions or observations received in accordance with paragraph (b), the manager of the planning authority may, subject to, and in accordance with, the provisions of the Planning and Development Act, 2000 (apart from the amendments of them effected by this section), decide to grant the permission, with or without conditions, or to refuse the permission.

(d) Section 34(6) of the Planning and Development Act, 2000, shall not apply to applications for permission referred to in paragraph (a).

(e) Notwithstanding section 34(8) of the Planning and Development Act, 2000, where a notice referred to in paragraph (a) is published in relation to an application for permission for development, the manager of the planning authority concerned shall make his or her decision in relation to the application within the period of 8 weeks beginning on the day on which the notice is first published.

(10C) (a) Where development which is consistent with the provisions (including any objectives contained therein) of, and is necessary for the proper implementation of, the waste management plan in force in relation to the area concerned but, in the opinion of the manager of the authority, would contravene materially any other objective of the development plan in force in relation to the area concerned, is proposed to be carried out by—

- (i) a local authority that is a planning authority, or
- (ii) some other person on behalf of, or jointly or in partnership with such a local authority, pursuant to a contract entered into by that local authority, within the functional area of the authority (hereafter in this section referred to as "proposed development"), the manager shall publish notice of the intention of the authority to carry out the proposed development in one or more newspapers circulating in that functional area.

(b) Any submission or observation in writing in relation to the proposed development which is received by the planning authority not later than 4 weeks after the publication of the notice in accordance with paragraph (a) shall be considered by the manager of the authority.

(c) Following consideration of any submissions or observations received in accordance with subsection (2), the manager may—

- (i) notwithstanding the fact that the proposed development would materially contravene the development plan, decide to proceed with the proposed development, with or without modifications (and, where he or she so decides, he or she shall follow the relevant procedures contained in section 175 or 179 of the Planning and Development Act, 2000, as appropriate), or
- (ii) decide not to proceed with the proposed development.

(10D) (a) In performing their functions under the Planning and Development Acts 2000 to 2002, and, in particular, their functions under Part III and sections 175 and 179 of the Planning and Development Act 2000, planning authorities and An Bord Pleanála shall ensure that such measures as are reasonably necessary are taken to secure appropriate provision for the management of waste (and, in particular, recyclable materials) within developments, including the provision of facilities for the storage, separation and collection of such waste (and, in particular, such materials) and the preparation by the appropriate persons of suitable plans for the operation of such facilities.

(b) The Minister may issue guidelines as to the steps that may be taken to comply with this subsection.

(11) In making or evaluating a waste management plan, the local authority or authorities concerned shall have regard to the proper planning and development of its or their functional area or areas and shall, for this purpose, have regard to the provisions of—

- (a) the development plan or plans and any special amenity area order made under the Act of 1963,
- (b) a water quality management plan made under the Local Government (Water Pollution) Acts, 1977 and 1990, and
- (c) an air quality management plan made under the Air Pollution Act, 1987,

for the time being in force in relation to the said area or areas.

(12) A local authority shall take such steps as are appropriate and necessary to attain in relation to its functional area the objectives in a waste management plan made by the authority (whether such plan has been made by the authority or jointly by the authority with another local authority or other local authorities).

(13) The corporation of a borough (not being a county borough) or the council of an urban district shall, in the performance by it of any functions in relation to waste management, have regard to the provisions of a waste management plan made by the council of the county in whose functional area the borough or urban district is situate.



## APPENDIX 3

### 2021 Evaluation of the Regional Waste Management Plans 2015-2021

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Appendix A Revised Content for Waste Management Plans

Appendix B Legislative Review

## Acknowledgements

The combined Connacht-Ulster, Southern and Eastern-Midlands Regional Waste Management Planning Offices acknowledge the role of RPS in compiling this report. The authors would also like to thank the many local authority staff who contributed to the compilation of data to inform this evaluation.



## Acronyms

Term	Meaning
AA	Appropriate Assessment
AR	Annual Returns
CAS	Civic Amenity Site
CCPC	Competition & Consumer Protection Commission
CoA	Certificate of Authorisation
CoR	Certificate of Registrations
CRNI	Community Reuse Network Ireland
CSAI	Charity Shop Association of Ireland
CUR	Connacht Ulster Region
DAFM	Department of Agriculture, Food and the Marine
DECC	Department of the Environment, Climate and Communications, formerly the Department of Communications, Climate Action and Environment (DCCA) – Pre-2020
EAO	Environmental Awareness Officer
ELT	End-of-Life Tyres
ELV	End-of-Life Vehicles
EMR	Eastern Midlands Region
EPA	Environmental Protection Agency
EPR	Extended Producer Responsibility
EU	European Union
FHW	Farm Hazardous Waste
IWMA	Irish Waste Management Association
LA	Local Authority
LAPN	Local Authority Prevention Network
MRW	Municipal Residual Waste
NCAD	National College of Art and Design
NGO	Non-Government Organisation
NWCPO	National Waste Collection Permit Office
NWPP	National Waste Prevention Programme
NWSMP	National Wastewater Sludge Management Plan
OECD	Organisation for Economic Co-operation and Development
OGP	Office of Government Procurement
PMG	Price Monitoring Group
RWMPO	Regional Waste Management Planning Offices
RWMP	Regional Waste Management Plan
SEA	Strategic Environmental Assessment
SME	Small or Medium-Sized Enterprise
SRF	Solid Recovered Fuel
SUP	Single Use Plastic
SR	Southern Region
WERLA	Waste Enforcement Regional Lead Authority
WEEE	Waste Electrical and Electronic Equipment
WtE	Waste to Energy

## NON-TECHNICAL SUMMARY

### Scope of the Evaluation

Waste management planning is the responsibility of the local authorities under Part II of the Waste Management Act 1996 and in June 2013, the three waste management regions of Connacht-Ulster, Southern, and Eastern-Midlands were established. In May 2015, each of the three regions published a Regional Waste Management Plan (RWMP) to cover the period 2015 to 2021.

A series of objectives, policies and actions in the RWMP set the framework for the prevention and management of wastes in a safe and sustainable manner in each region. These are administered by three Regional Waste Management Planning Offices (RWMPO).

The purpose of this report is to provide an evaluation of the progress achieved under the three RWMPs to meet the requirements of Section 22(2)(d) of the Waste Management Act and to provide a recommendation to review or replace the current plans. The findings of the evaluation process concludes that the current regional waste plans are to be replaced with a single national plan for the purposes of waste management.

### A Shared Ownership Model

In terms of delivery, the evaluation has identified a high level of implementation by the RWMPO of the prescribed policies and policy actions across the eight strategic objectives. The majority of the prescribed actions were fully or partially delivered by the RWMPO to a high standard and the current framework for waste management planning in the regions has progressed significantly from publication of the current plans in 2015. Particular areas of success include establishing and building strong stakeholder collaboration with key industry players, coordinating and tracking waste data and managing information on treatment capacity.

However, the evaluation also points to a lower performance in achieving the three headline strategic targets of the waste plans covering prevention, recycling and landfilling. It is acknowledged that these targets were highly ambitious when first set in 2015 with a focus on the prevention of waste in the first instance coupled with maximising recycling and reducing the dependency on landfill. The absence of any meaningful progress on these targets over the plan period is a concern despite the positive evaluation of the RWMPO performance.

This contradiction illustrates one of the key issues for consideration in the replacement plan, i.e. the need for a shared ownership of the future plan and targets. While the RWMPO are tasked with providing the structure and framework for delivery of the targets, the local authority network is not solely responsible for the achievement of these targets. Furthermore, the RWMPO does not have the authority to control all operations in the waste sector to drive the changes to achieve these targets.

The changes required can only be achieved through a sector wide shared collaboration and ownership of the replacement plan and associated targets and policies. This collaboration requires active participation from all stakeholders (public and private) in a highly functioning waste collection, processing, recovery and disposal market coordinated by the RWMPO.

### The need for a dynamic Plan

The second key consideration relates to the need for dynamism and flexibility to be built into the plan to allow the RWMPO to respond to evolving priorities, policy, legislation and market forces. Over the lifetime of the current plans there have been a number of policy and legislative changes that have shifted waste policy and legislative requirements including the EU Circular Economy Action Plan, the Waste Action Plan 2020 – 2025 and more recently the Circular Economy Programme 2021-2027.

In addition, there has been significant changes in the waste collection and treatment infrastructure implemented over the plan period resulting in a significantly modified industry landscape since the commencement of the plans 2015. When coupled with other significant external challenges such as the 2016 municipal residual waste capacity deficit or the 2020/2021 COVID-19 response, the waste sector can be viewed as a constantly changing and fluid system with evolving and dynamic priorities.

In this regard, it is important the replacement plan is sufficiently flexible to allow for a dynamic response to evolving issues over the lifetime of the plan. These evolving issues may include thematic or sectoral

prioritisation, market drivers for collection, treatment capacity and/or emergency responses to unforeseen events.

The current model of setting priority actions that apply for the six year plan period proved to be effective for progressing many policies, but was also overly rigid. It is suggested that the next plan replaces this structure with annual or biennial quantifiable actions developed as part of annual implementation plans. Such an approach in the replacement plan will lead to a more dynamic implementation model allowing the RWMPO to respond to issues as these arise over the plan period.

## A Thematic Approach

While the defined legislative requirements for waste management plan content are prescriptive under Section 22 of the Waste Management Act, the replacement plan structure needs to provide an adaptable clear framework for delivery. The RWMPO has previously proposed setting out an alternative thematic approach to the plan promoting the following themes:

- Consumption of materials and generation of waste;
- Compliance with relevant waste management laws and policies;
- Capture of waste materials for treatment; and
- Circularity to tie each of the above together.

Such a thematic approach would be a departure from the current target and objective-led structure in the existing RWMPs, however, this approach will help to set more meaningful and thematic led targets to drive the improvements needed. This thematic approach is recommended for the replacement plan while ensuring all of the legislative requirements are suitably addressed.

## Ireland's next Waste Plan

Ireland's National Waste Policy 2020 – 2025 'A Waste Action Plan for a Circular Economy' calls for the replacement of the existing Regional Waste Management Plans with a single National Waste Management Plan containing targets for reuse, repair, resource consumption and a reduction in contamination.

The single plan will aim to build on the progress from 2015, strengthen national capacity and delivery while retaining a regional focus for implementation.

Development of this National Waste Management Plan commenced in 2021 and will be informed by the outcomes of this evaluation.

## 1 INTRODUCTION

In July 2012, Government waste policy<sup>1</sup> recommended the consolidation of the previous ten waste regions in the State to a maximum of three regions as follows:

- The Southern Waste Region;
- The Eastern Midlands Waste Region; and
- The Connacht Ulster Waste Region.

In May 2015, each of the three regions published a Regional Waste Management Plan (RWMP) to cover the period 2015 to 2021 and within the three plans the following targets and actions were prescribed:

- 3 headline strategic targets covering prevention, recycling and landfilling and these are common to the three plans;
- 8 strategic objectives which set out the region's statement of intent for each of the plans which are also common to the three plans;
- 43 policies to achieve the overarching strategy and targets of the plans which are common across the three plans; and
- 63 policy actions implementing each of policies listed with only minor differences between the three plans.

These policies and objectives set the framework for the prevention and management of wastes in a safe and sustainable manner in each of the three regions and these are administered by three Regional Waste Management Planning Offices (RWMPO).

Article 28 of the EU Waste Framework Directive (2008/98/EC) requires Member States to include 'an evaluation of how the plan will support the implementation of the objectives and provisions of this Directive' as part of the waste management plan process. The Directive has been transposed into Irish law in the European Communities (Waste Directive) Regulations 2011-2020<sup>2</sup>, and the Waste Management Act 1996, as amended. Section 22(2)(d) of the Act requires waste management plans to be evaluated at least once in each period of six years after the date of making of the plan.

The purpose of this report is to provide an evaluation of the progress achieved under each of the three RWMPs to meet the requirements of Section 22(2)(d) of the Act. The evaluation will systematically review all policy actions and strategic targets and sets out the details for achievement of each of the headline targets, strategic objectives, policies and policy actions. The evaluation also provides recommendations to inform the next phase of waste management planning which commenced in 2021.

<sup>1</sup> A Resource Opportunity - Waste Management Policy in Ireland, Department of the Environment, Community and Local Government, July 2012

<sup>2</sup> The European Communities (Waste Directive) Regulations 2011 – 2020 include both S.I. No. 126 of 2011 and S.I. No. 323 of 2020.



## 2 EVALUATION METHODOLOGY

### 2.1 Overview

This evaluation has followed the methodology set out in the technical guidance document 'Evaluation of Regional Waste Plans – technical support working document' issued by the National Waste Co-ordination Committee in 2012.

### 2.2 Evaluation Planning

In order to provide a robust and systematic evaluation of the policy actions contained within the RWMPs, a template was developed to provide a structured approach to analysing the information gathered. This template is designed to meet the objectives of the evaluation in a clear and unambiguous manner and to address each of the following elements;

- Details of the RWMP policy action – targets, timelines, responsibility, etc.;
- Summary evaluation – with quantified and qualified metrics of the extent of achievement;
- Legislative changes relevant to the policy action;
- Environmental considerations relevant to the policy action; and
- Consideration of the relevance of the policy action for consideration in the next phase of waste management planning.

The template was provided to the RWMPs on a phased basis for each of the Strategic Objectives with the RWMPs invited to provide evaluation details for each of the policy actions. These details were supplemented with additional technical, legislative and environmental analysis provided by RPS to complete the evaluation.

### 2.3 Evaluation of Policy Implementation

The evaluation process was subsequently undertaken by applying a tiered approach as per **Figure 2.1** and as listed below:

- Tier 1 entailed the initial evaluation of the 63 policy actions by employing the *pro-forma* template devised;
- Tier 2 is an evaluation of the 43 policies within the RWMP and was informed by the Tier 1 policy action evaluation; and
- Tier 3 is the overall summary evaluation of the 8 strategic objectives and 3 strategic targets based on the Tier 1 and 2 evaluations.

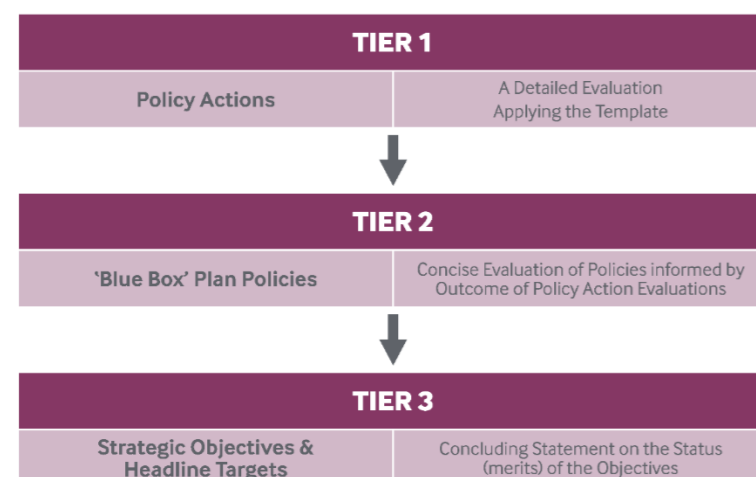


Figure 2.1: Three-Tiered Evaluation Approach

### 2.4 Review Legislative Requirements

Since the 2015 publication of the regional plans, there have been a number of key changes to policy that are relevant to this review and these are summarised below:

- In December 2015, the Commission adopted a Circular Economy Action Plan (COM (2015) 614) which has been updated in March 2020 (COM (2020) 98) as part of the European Green Deal. The new Action Plan announces initiatives along the entire life cycle of products, targeting their design, promoting circular economy processes, fostering sustainable consumption and aiming to ensure that the resources used are kept in the EU economy for as long as possible. Circular economy principles were addressed in the existing RWMPs to pre-empt this policy development; and
- In September 2020, the government published 'A Waste Action Plan for A Circular Economy – Ireland's National Waste Policy 2020 – 2025'<sup>3</sup> and this policy document continues to shift the focus away from waste disposal and moves it up the production chain in line with the circular economy principles. This plan will be supported by an 'All of Government Circular Economy Strategy' to be published in 2021. One of the measures listed in the Waste Action Plan for a Circular Economy 2020-2025 relates to the revision of the existing three regional plans into a single national plan.

These policy changes will be noted through the evaluation of the plans and the development of recommendations for the next phase of waste management planning.

A review of the changes in legislation since publication of the plans in 2015 has been undertaken and the key change is the revised EU legislative framework on waste (Directive (EU) 2018/851). This Directive entered into force in July 2018 and sets clear targets for reduction of waste and establishes an ambitious and credible long-term path for waste management and recycling. This Directive has been transposed into Irish legislation through the European Union (Waste Directive) Regulations 2020 (S.I. No. 323 of 2020). One of the key features of this new legislation relates to a redefined set of requirements for Waste Management Plans under Section 22 of the Act, as amended, and these requirements are included in **Appendix A**.

In addition, there are a number of wider legislation changes with potential implications on the evaluation of the plans and these are listed in **Appendix B**. These legislative changes will be noted through the evaluation of the plans and the development of recommendations for the next phase of waste management planning.

### 2.5 Environmental Considerations

An environmental review of each of the policy actions has been undertaken to provide an analysis of the environmental impacts of delivery or non-delivery of each of the prescribed actions. This assessment was undertaken relative to the analysis presented in the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) documentation prepared for each of the plans in 2015.

### 2.6 Recommendations

The evaluation of the delivery of each policy action has allowed for a considered conclusion on the primary drivers in achieving or failing to meet the prescribed plan targets. This has also allowed for an analysis of the potential changes or otherwise to the policy actions presented in the 2015 RWMPs and how these may be omitted, revised, enhanced or retained in the future revision of the plans. These considerations are against the backdrop of the updated waste and environmental protection legislative and policy requirements. The outcome of this analysis is a detailed set of statements for each policy action that sets out the direction for the local authorities to consider in the revision of the RWMPs.

<sup>3</sup> Available at: [www.dccae.gov.ie/en-ie/environment/publications/Documents/55/Waste\\_Action\\_Plan\\_for\\_a\\_Circular\\_Economy.pdf](http://www.dccae.gov.ie/en-ie/environment/publications/Documents/55/Waste_Action_Plan_for_a_Circular_Economy.pdf)

### 3 EVALUATION

#### 3.1 Strategic Objective A - Policy & Legislation

**Strategic Objective A: The Region will implement EU and national waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.**

##### 3.1.1 Policy Actions

The summary of the review of the five policy actions for Strategic Objective A is presented in **Table 3.1**. This evaluation indicates a generally moderate to high degree of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

**Table 3.1: Evaluation of Policy Actions for Strategic Objective A**

Policy Actions	Evaluation
A.1.1 Move waste further up the hierarchy by eliminating the direct disposal of unprocessed residual municipal waste to landfill.	This policy action cannot be fully evaluated without securing and verification of specific data to determine whether the target of complete elimination (i.e. 0%) unprocessed MRW going to landfill is fully achieved. On a wider context, Ireland's landfill rate for municipal waste reduced to 14% in 2018 but information is unavailable on the volume of this material that was unprocessed. Further data will be required to identify any movement of municipal residual waste (MRW) from sources (landfills / civic amenity sites (CAS) / transfer stations) which are not pre-processing (physical, biological, chemical or thermal processes, including sorting) MRW prior to consigning to landfill.  This policy action is appropriately challenging and is relevant for consideration in the revised or replacement Plan, but the data required to measure compliance needs to be fully recorded as routine to close the current information gap. Future consideration should be given to imposing licence conditions to prohibit or restrict the acceptance of unprocessed municipal waste at landfills and Waste to Energy (WtE) facilities.
A.2.1: Review the application fee structures related to regulatory activities for local authority facility authorisations.	This action, scheduled for Q4-2016, was fully delivered by Q2-2017. The review was completed. Fees will require ongoing monitoring and adjustment, through the legislation, where circumstances change. The findings of the review were issued to Department of Environment, Climate and Communications (DECC) for implementation with a recommendation to amend the fees listed in Schedule 5 of the Regulations. DECC has advised that this legislative amendment is tied to a review of the primary legislation and the timeframe for review is unknown. This outcome remains relevant to the revised or replacement Plan, with the focus on DECC to amend the legislation as proposed.
A.2.2: Review and implement (if appropriate) charging structures in place for wastes accepted at local authority civic amenity and other local authority waste facilities	This recurring annual action was partially completed, on schedule, in the format envisaged for 2015-2017. This 2015-2017 review process highlighted a need for a more fundamental, systemic review of civic amenity sites (CAS) operations. This systemic review has been actively pursued since 2018 and has been finalised in late 2020.  The review element of this policy action has been completed with two reviews completed but the annual frequency required has not been achieved. The need for an annual review is questioned and should be considered in the revised or replacement Plan. The implementation task is still outstanding, and the next plan, revised or replacement, needs to support the implementation of the fee structure recommendations of the 2020 CAS review report. In particular, the recommendation to develop a framework for a collective approach to the optimisation of income, the minimisation of costs, and consistency on gate fees, domestic and commercial.
A.3.1: Prepare an annual report on the progress of policy actions and the implementation of mandatory and waste plan performance targets (refer to Chapter 5).	This is a recurring annual action and was partially delivered, somewhat on schedule, but at reduced frequency and future actions are scheduled. The statistics used were necessarily based on most recent validated data available - from two years prior to the period when the report is generated. The time periods reported varied – the year 1 report covered a 12-month period, and the year 2 report covered an 18-month period.  It is important to report on progress towards targets and indicators, but 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. This action remains relevant for future reporting requirements and should also take into account any new dynamic or live

Policy Actions	Evaluation
A.4.1: Monitor and report on planned, authorised and utilised capacity on a regional and national basis (building on the work done for the waste plan).	reporting and data management regime implemented under the Waste Action Plan for a Circular Economy 2020-2025.  A comprehensive quarterly report on Municipal Residual Waste Capacity is prepared by the RWMPO addressing capacity regionally and nationally. This reporting involves liaison with the final destination facilities, the cement kilns, the National TFS office and the EPA to gather the statistics to prepare the quarterly reports. The report also reviews the construction and demolition waste trends and deficits.  This is a recurring quarterly action and was fully delivered on schedule with future actions scheduled. This is a critical requirement to provide ongoing data on capacities and remains relevant for the revised or replacement Plan.

##### 3.1.2 Policies

A short commentary on the policies of Strategic Objective A is presented in **Table 3.2** and these are informed by the policy action evaluations.

**Table 3.2: Evaluation of Policies for Strategic Objective A**

Policy	Evaluation
A.1 Take measures to ensure the best overall outcome by applying the waste hierarchy to the management of waste streams.	The RWMPO have evaluated progress on the elimination of unprocessed MRW from landfill. Data availability limits the ability to quantify policy performance. Items that require consideration for 'replacement' policy actions to progress/evolve the plans under this policy include: <ul style="list-style-type: none"> <li>The Waste Action Plan for a Circular Economy 2020-2025 recommends adoption of the food waste hierarchy as a priority order in food waste prevention and management. New plans must also take account of the food waste hierarchy in designing and implementing policy measures; and</li> <li>Activities including reuse and preparation for reuse, charity shop liaisons and circular economy activities are higher in the waste hierarchy, ensuring the best overall outcome.</li> </ul> This policy remains relevant for the revised or replacement Plan with modification as outlined above along with a greater data collation to track progress.
A.2 Implement the polluter pays principle across all waste services and regulatory activities in a manner appropriately reflecting the risk to the environment and human health.	Policy is implemented through the policy actions in both areas targeted, i.e. the regulatory fees and the civic amenity charging structures.  Local authorities have addressed the polluter pays principle by ensuring that civic waste management services achieve maximum cost recovery. For example, local authorities appropriately set civic amenity site (CAS) fee structures and recover costs for waste regulatory services. Some revision to CAS fee structures and regulatory application fees have been identified under this policy for implementation in the revised or replacement Plan.  As costs to local authorities change over time through evolving regulatory requirements, markets for recyclables, etc., the fees applied need to be monitored to ensure that the polluter does pay. Local authorities also consider how fees charged might indirectly encourage unsustainable waste management activities, while also delivering the polluter pays principle. This aspect will be considered in the CAS implementation plan for CAS Review Report.  Local authorities also address the polluter pays principle through measures to control and manage unsustainable waste management activities including litter and fly tipping.  This policy remains relevant for the revised or replacement Plan but with a renewed focus on the evolving fee structures proposed from the CAS Review and under the Waste Action Plan for a Circular Economy 2020-2025.
A.3 Contribute to the improvement of management performance across all waste streams through the implementation of policy actions and monitor progress towards national targets.	Key performance indicators relating to policy actions and targets have been used in the periodic reporting to facilitate improved waste management. This data management reporting is central to monitoring improvement of management performance. While periodic reporting provides a valuable monitoring regime to track progress, the non-availability of up to date waste data has been cited as a barrier to measuring performance and a more dynamic data reporting regime is required as recommended in the Waste Action Plan for a Circular Economy 2020-2025. The frequency of reporting should also be considered to maximise the balance between performance management and data availability for reporting.



Policy	Evaluation
	<p>The message delivery method has traditionally been delivered in written report format but the RWMPO released the 2020 annual report in video format which may assist in target achievement by getting the message to wider groups and extracting additional value from the output.</p> <p>This policy remains relevant for the revised or replacement Plan but the lower tier actions on reporting and data management should be reflective of any new system developed under the Waste Action Plan for a Circular Economy 2020-2025.</p>
A.4 Aim to improve regional and national self-sufficiency of waste management infrastructure for the reprocessing and recovery of particular waste streams, such as mixed municipal waste, in accordance with the proximity principle. The future application of any national economic or policy instrument to achieve this policy shall be supported.	<p>The quarterly reports on MRW and C&amp;D waste management capacity are a mechanism to monitor achievement of this Policy. National economic or policy instruments to achieve this policy will be supported. Regional Waste Management Planning Offices inputs to planning and other processes consider these principles. This policy remains relevant for the revised or replacement Plan.</p>

### 3.1.3 Strategic Objective A

Evaluation of Strategic Objective A indicates generally moderate to good progress towards achieving indicators with qualitative and quantitative indicators enabling easy evaluation of progress. There has been some progress beyond the indicator target measures delivering on the overarching policy. For example:

- Production of policy action A.3.1 data in video format will deliver messaging to a wider audience; and
- The root-and-branch review of the CAS network extends to a wider remit than the review of charging systems set out by policy action A.2.2.

The revision to the Plan must focus strongly on implementation of the circular economy approach which is the cornerstone of current and future EU and national waste policy, legislation, guidance and codes of practice. This is a clear continuation of Strategic Objective A which should be continued but with a greater circular economy emphasis within the overarching objective.

A transition to a circular economy requires, and helps to deliver, increased national self-sufficiency including for waste management. It is recommended that waste management self-sufficiency, in the Irish context, be given increased focus during the next Plan period.

In terms of data management and flow, the recommendations for a more comprehensive, shared and timely reporting system within the Waste Action Plan for a Circular Economy 2020-2025, such as through a live reporting system, will aid in the management performance and capacity management elements of the objective. Once a successful dynamic and transparent reporting system is implemented, it will aid in the tracking of performance to targets, identifying capacity issues and helping to improve behaviour change.

Challenges remain in the management of unsustainable waste management activities - littering, fly tipping, illegal dumping - to deliver the polluter pays principle. These unsustainable practices were further highlighted with more local activities during the COVID-19 pandemic. It is recommended that unsustainable waste management activities be further prioritised for action during the revised or replacement Plan with specific actions.

The revised or replacement Plan is to consider the following:

- The wording of Strategic Objective A remains relevant for the next iteration of the Plan but with the inclusion of a clear reference to the circular economy;
- A policy to condition all landfill (and potentially WtE) licences prohibiting these facilities from accepting unprocessed municipal wastes to support the Waste Action plan target of reducing residual waste disposal to 10%;
- Adoption of the food waste hierarchy as a priority order in food waste prevention and management. The future Plan must also take account of the food waste hierarchy in designing and implementing policy measures *to halve food waste generation by 2030*;
- Revising the primary legislation to align with the fee structures in Schedule 5 of the Waste Management Facility and Registration Regulations for waste applications should be retained and progressed;
- The implementation of all recommendations published in the CAS review;
- Any revised data management and reporting system adopted is to support dynamic outputs informing quarterly reports on MRW management capacity to support planning and self sufficient capacity;
- A new system for improved reporting on the nature and extent of used textiles is also required to support tackling this waste stream; and
- The difficulty of management of wastes during emergencies (such as the 2016 capacity issue for municipal waste) was further highlighted by the COVID-19 response to significantly altered public waste management patterns. A response is needed as public health, environmental protection, and national targets remain in force during emergency situations. The coordination of a national response plan and crisis communication strategy for waste management in emergency situations is to be included in the future Plan.

## 3.2 Strategic Objective B - Prevention

**Strategic Objective B: Prioritise waste prevention through behavioural change activities to decouple economic growth and resource use.**

### 3.2.1 Policy Actions

The summary of the review of the Policy Actions under Objective B is presented in **Table 3.3**. The evaluation shows a high level of compliance with these policy actions with a significant degree of achievement to scope and time.

**Table 3.3: Evaluation of Policy Actions for Strategic Objective B**

Policy Actions	Evaluation
B.1.1 Appoint, where the role does not exist, or retain the role of the local authority Environmental Awareness Officers (EAOs) on a whole-time equivalent basis to work on activities including the implementation of the waste plan on a local and regional basis.	Environmental Awareness Officers (EAO) have been appointed in most, but not all, local authorities. The public awareness elements of the RWMP are typically lead by the role of the local authority Environmental Awareness Officers (EAOs) and, as such, these staff are critical to the delivery of real behaviour change under the plan's objectives. The effectiveness of EAO roles may be threatened at four local authorities where the roles are being filled by part-time/assistant appointments. This policy action remains relevant for the revised or replacement Plan with all additional supports required for local authorities to appoint and retain EAO as required.

Policy Actions	Evaluation
B.1.2 Ensure an ongoing financial allocation is made in the local authority annual budgets to cover expenditure on waste prevention related activities over and above staff costs and any grant aid.	The RWMPO estimate that the combined annual figure for prevention/reuse, based on a €0.15 contribution per inhabitant, is €671,331 with additional funds supplied through the EPA's Local Authority Prevention Network (LAPN). Funding has been provided for a range of waste projects including eliminating single use plastics, addressing in-house waste minimisation issues, community grants supporting waste prevention initiatives, waste prevention at festivals and events, learning and education workshops and a variety of promotional materials. This policy action remains relevant for the revised or replacement Plan. The funding benchmark needs to be index linked and a review of the €0.15/inhabitant spend is recommended for the revised or replacement Plan.
B.2.1 Collaborate regionally on prevention initiatives and programmes targeting priority areas to raise awareness of the benefits of prevention and deliver campaigns with more impact and better value for money.	The RWMPO have ongoing regional project collaboration on prevention campaigns, the most significant of which was the development of the <a href="http://www.mywaste.ie">www.mywaste.ie</a> website. Other successful collaborations include Reuse Month, Upcycle Challenge, European Week for Waste Reduction, Greener Christmas Campaign and Hazardous Prevention Projects. The policy action remains relevant under the revised or replacement Plan as continued collaboration between the regions will be central to the success of the plan and the Waste Action Plan. The action will need some revision to reflect the single national plan but with a regional focus.
B.2.2 Ensure existing documentation on sectoral waste prevention actions and programmes is catalogued, available and disseminated in region. New material on prevention will be produced to fill any sectoral needs or gaps identified.	The RWMPO have a current shared file system but are developing a cloud-based database which will allow for upload of the full documentation library for ease of access to all local authorities. The RWMPO estimate that there are approximately 2,000 documents and assets contained within the library. All information within the library is reviewed and updated on an ongoing basis by the RWMPO to ensure the most up to date information is provided and to inform the design of new waste prevention areas for attention and campaigns each year. This policy action remains relevant for the revised or replacement Plan.
B.2.3 Maintain the implementation of effective local prevention, awareness and education campaigns targeting households, communities, schools and businesses.	The RWMPO have successfully achieved the requirements of action B.2.3 throughout the plan period. As an illustrative example, in 2018 there were 691 Recycling Ambassador Workshops which directly reached 24,730 people and 121 reuse month events led by Local Authorities. This policy action remains relevant for the revision or replacement of the Plan with a focus aligned with the Waste Action Plan for a Circular Economy 2020-2025 and the legislative recycling targets.
B.2.4 Maintain, develop and integrate waste prevention measures and systems into all local authority offices and operations to best practice standards.	Some, but not all, local authorities have been able to implement this action in a timely manner. Due to variations between how local authorities operate, appoint waste service providers and record waste information, it has been difficult to identify an accurate baseline in all jurisdictions. The RWMPO are actively trying to resolve these issues and to encourage full compliance with this action. This policy action appears to have been ambitious in 2015 given the difficulties in setting a robust baseline in all local authorities. It is recommended that this policy action be refocused to establishing an accurate baseline (such as through a common reporting and/or procurement model) and then with retention of a suitable target or targets in line with circular economy principles.
B.3.1 Establish regional and local structures and networks through the regional office to ensure effective, consistent and practical coordination and implementation of NWPP initiatives.	Prevention initiatives are agreed at Steering Committee level in each region and the actions are supported by the Operations Team and generally implemented by RWMPO and EAO Prevention Education and Green Business task group. This policy action remains relevant for the revised or replacement Plan.
B.3.2 Work with the committee and management team of the NWPP to contribute to the development of the Programme's initiatives and to report on the effectiveness of implementation and funding at regional and local levels.	The RWMPO have had ongoing representation on the NWPP committee meetings on each of the occasions where the committee has convened. As well as NWPP committee meetings, other meetings have been held with individual members of the NWPP team, to progress specific campaigns or projects as required. The RWMPO also set out a position paper on prevention prior to the EPA's review of prevention and participated in number of workshops on the review of the national waste prevention plan. This policy action remains relevant for the revised or replacement Plan.
B.4.1 Promote the prevention of hazardous wastes to households, communities and small businesses building on effective initiatives and	The RWMPO have delivered a number of such campaigns including the Greener Cleaning, Greener Gardening, Greener DIY, Paint Squirrel. In 2016 there were 31 campaigns, a further 10 campaigns in 2017 and in 2018 there were 11 campaigns resulting in a total of 52 campaigns over the plan period. This includes one day collections and awareness raising on prevention. This action remains relevant but will

Policy Actions	Evaluation
disseminating best practice throughout the region.	need to be refocused to account for the revised National Hazardous Waste Management Plan and the planned collection systems for households to maximise the efficiency of the collection but also to ensure that this collection system does not hamper the prevention initiatives.
B.4.2 Work with manufacturers, designers, compliance schemes, and national authorities on the development of waste prevention measures for products and services.	The Regions undertake a wide range of meetings under this policy action as follows: <ul style="list-style-type: none"> <li>• Meetings with Repak in relation to prevention and recycling of waste packaging;</li> <li>• Meetings with other PR schemes, such as those for WEEE, ELVs and ELTs schemes;</li> <li>• General meetings with environmental NGOs, EPA, DECC, NWCPO &amp; WERLA; and</li> <li>• Meetings with the EPA and DECC representatives quarterly to discuss prevention projects and progress.</li> </ul> This policy action has a broad remit, and there is limited opportunity for the RWMPO to work with manufacturers and designers. It may be beneficial to revise this policy action to align with the prevention requirements for products under the Extended Producer Responsibility regime.
B.4.3 Collaborate with other national authorities and agencies delivering communication and information campaigns to include messaging on waste prevention and recycling.	The Regions are represented on the National Communications Strategy Group which is chaired by The Department of Environment, Climate and Communications (DECC) (formerly the DCCA) and other members include the EPA, REPAK and PMG. Meetings are held quarterly. Ongoing collaboration is evident through the implemented advertising campaigns, LAPN projects, food waste prevention and recycling – Recycling List Ireland and the <a href="http://www.mywaste.ie">www.mywaste.ie</a> website. All members of the public were targeted through different media, for example radio and television, social media, and in particular cases there were billboard displays, and displays on buses and in busy commuter areas. This policy action remains relevant for the revised or replacement Plan.

### 3.2.2 Policies

A short commentary on the level of achievement of the policies of Strategic Objective B is presented in **Table 3.4** and these are informed by the policy action evaluations.

**Table 3.4: Evaluation of Policies for Strategic Objective B**

Policy	Evaluation
B.1 Local authorities in the region will ensure the resources required to implement waste prevention activities are available through the lifetime of the plan.	Feedback from the RWMPO indicates that the resourcing by the local authorities under this policy is adequate but challenging. In some local authorities resourcing is limited to part time or assistant level which impacts on the achievement of these policies actions in those local authority areas. In addition, EAO retention has been cited as an issue by the RWMPO. A review of the funding model for staff resourcing is recommended to ensure that future waste prevention activities, including those under the Waste Action Plan, are suitably resourced. Similarly, the financial resources provided by Local Authorities is considered adequate but any additional supports would further aid the RWMPO function on waste prevention activities. The funding model should also be reviewed from the spend proposed in 2015 to account for both interim inflation as well as projected resourcing for the next six-year plan period. The review needs to be more rounded than a simple indexing and should reflect the increased RWMPO efforts under the revised or replacement Plan.
B.2 Promote behavioural change and extend waste prevention activities through information campaigns, targeted training and local capacity building, working with households, communities, schools, business, and other public institutions.	The resourcing available under Policy B.1 has been used to successfully deliver a wide range of information campaigns, targeted training and local capacity building. The RWMPO have successfully collaborated in devising and implementing these campaigns and should be supported in the revised or replacement Plan in developing same through the retention of this policy. In addition, the prevention measures in the Waste Action Plan for a Circular Economy 2020-2025, the Second Circular Economy Action Plan and the EPA's National Programme for the Circular Economy (replacing the National Waste Prevention Programme) need to be incorporated into the subsequent policy actions. For example, there is a greater focus on food waste and the requirements of the Food Waste Prevention Roadmap will need to be actioned under this policy.
B.3 Build and maintain a strong partnership with the National Waste Prevention Programme.	The RWMPO have successfully built and maintained a strong working relationship with the key NWPP stakeholders, i.e. the EPA and DECC and the RWMPO have adequate representation on the NWPP committee meetings.

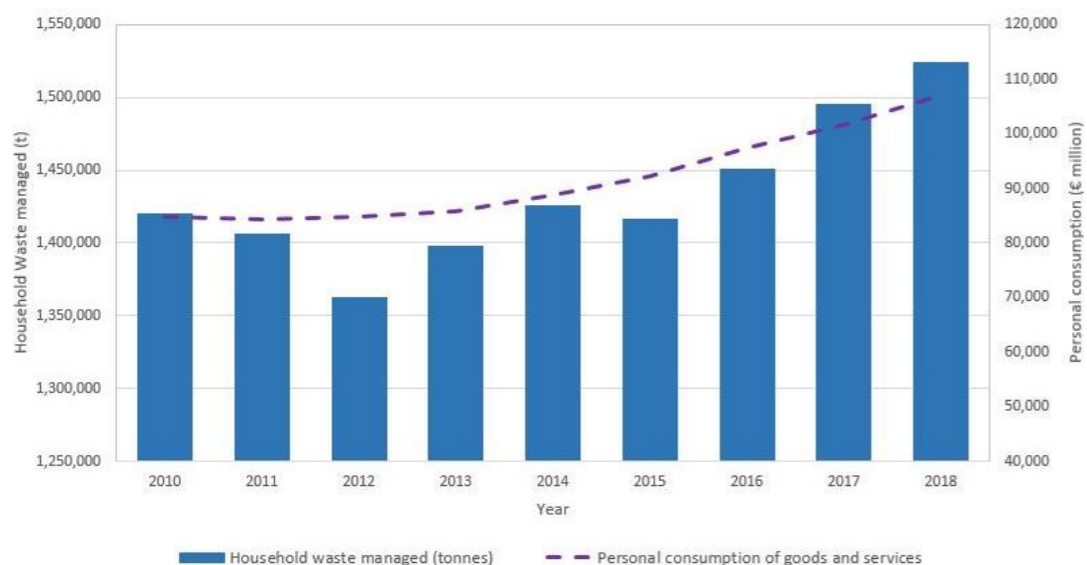


Policy	Evaluation
B.4 Harmonise prevention activities in the region to link with the national hazardous waste management plan, producer responsibility operations and other related programmes (such as litter, sludge, water etc).	<p>Under the current plan, the implementation of the prevention activities have been dictated by collaboration by the RWMPO to agree consistent messaging and implementation and then undertaken at a regional level by the RWMPO. With the revised or replacement Plan migrating to a single national plan with a regional focus this mode of operation can be maintained. This future implementation will require some modified actions to account for the following changes:</p> <ul style="list-style-type: none"> <li>• The EPA is currently preparing the updated National Hazardous Waste Management Plan which is due for publication in 2021;</li> <li>• There is a new legislative requirement to implement a collection system for hazardous waste produced by households (Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020) – this may have implications for increased collection and a potential increased reporting volume for hazardous waste; and</li> <li>• The revised rules for Extended Producer Responsibility (EPR) schemes under the Waste Framework Directive and implementing regulations (Regulation 30A European Union (Waste Directive) Regulations 2011-2020).</li> </ul> <p>Further harmonisation policies will be aided by the development of a single national plan, but the evolving legislative regime needs to be considered in updating this policy and the subsequent actions.</p>

### 3.2.3 Strategic Objective B

Evaluation of the policies and policy actions under this Strategic Objective indicates generally good progress towards achieving the prescribed indicators. Of the eleven prescribed actions, ten of these have been delivered to a high standard illustrating the significant progress that the RWMPO have achieved in terms of prioritising waste prevention through these activities. Resourcing, messaging and collaboration on waste prevention have all been delivered by the RWMPO throughout the plan period with a number of policy and legislative changes on hazardous waste, food waste and EPR. This strategic objective remains relevant but may need more focus in the revised or replacement Plan.

However, while the messaging function under the RWMP has been delivered, it is noted that actual behaviour change and real waste prevention has been less successful. **Figure 3.1** shows the annual household waste managed for the period 2010 to 2018 and also the trend line for personal consumption of goods and services.



**Figure 3.1: Ireland's Household Waste and Consumption of Goods and Services (source: EPA)**

The data shows a clear correlation between income and waste generated and there is no evidence of significant decoupling of economic growth and resource use. It is noted that behaviour change is a slow process and the waste prevention initiatives launched through the existing plans may take some time to show a decoupling in future years.

The data trend highlights the need to continue to deliver messaging to the public to further drive greater behaviour change on prevention. As noted in the policy review, the funding mechanisms for these information

campaigns needs to be reviewed and greater resourcing provided to enhance the existing measures taken under this objective.

The revised or replacement Plan is to consider the following findings resulting from the evaluation:

- Strategic Objective B in its current form remains relevant and should be considered in the revised or replacement Plan;
- Resourcing of EAO at each local authority needs to be continued and enhanced to ensure key messaging mechanisms are maintained. There is a clear need for effective messaging to exact more pronounced behaviour change and support efforts to decouple waste generation from economic activity;
- Similarly, the allocation of future prevention funding per person needs to be index linked and future proofed for the lifetime of the revised or replacement Plan to ensure enhanced messaging is appropriately resourced;
- Prevention policy needs to be fully aligned with the policies presented in the Waste Action Plan and the Second Circular Economy Action Plan, e.g. the Food Waste Prevention Roadmap;
- The legislative driven changes to the Extended Producer Responsibility regime will need to be accounted for and actioned;
- The future Plan needs to be cognisant of the policies in the revised National Hazardous Waste Plan and the requirements to develop collection systems for households. The roll out of this system will improve regulation and reporting but may impact on the levels hazardous waste recorded in the State;
- There remains a need for all local authorities to consistently and clearly procure waste services to allow for generation of robust and transparent waste prevention data for all local authorities; and
- There is a need to establish a common waste procurement and reporting format for all local authority offices and operations to best practice standards to facilitate the integration of waste prevention measures and systems into these practices.

### 3.3 Strategic Objective C - Resource Efficiency and Circular Economy

**Strategic Objective C: The Region will encourage the transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources.**

#### 3.3.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective C is presented in **Table 3.5**. This indicated a generally high level of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

**Table 3.5: Evaluation of Policy Actions for Strategic Objective C**

Policy Actions	Evaluation
C.1.1 Engage with and facilitate enterprises in the development of repair and preparing for reuse activities.	The RWMPO have promoted the benefits of reuse among the general business sector throughout the plan period encouraging them to apply the reuse/repair concept within their own operation and/or to develop new enterprises around reuse, repair and preparation for reuse. The RWMPO engage on an ongoing basis with Community Reuse Network Ireland (CRNI) in the encouragement of members to develop enterprises which have a focus on reuse and upcycling of materials. The RWMPO had close association

Policy Actions	Evaluation
	with SMILE Resource Exchange which, until it closed in 2018, promoted and facilitated reuse and materials exchange between organisations. This policy action remains relevant for the revised or replacement Plan with further consideration of the new National Circular Economy Programme and targets on reuse under the 2020 amendment to Regulation 31(2) of the European Union (Waste Directive) Regulations 2011-2020 on preparing for re-use and recycling.
C.1.2 Review and amend (where appropriate) existing and/or condition the award of new local authority CA site contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations (WEEE will be considered subject to discussion and agreement with the compliance schemes).	A report on the review of CAS has been completed in 2020 and concluded that reuse and preparation for reuse and associated training/educational activities are inconsistent and unintegrated with a limited number of CAS active in this area. However, some CAS reported successful reuse partnerships with social enterprises, charities, or businesses and operations include segregation to facilitate offsite reuse/repair/preparation. There is no full quantification of reuse, repair or preparation for reuse of waste at CAS to demonstrate compliance with the 10% target. All CAS accept WEEE which accounts for 9% of materials accepted at CAS. An outcome of the CAS review is that CAS operators will be obligated to engage with Producer Responsibility Initiatives to evaluate options for facilitating reuse and repair (this is required as WEEE Compliance Schemes have ownership of the WEEE that is received at CAS). While the extensive review has been completed, this action needs to be refocused on the implementation of recommendations for the CAS Review for the revised or replacement Plan.
C.1.3 Engage with the Community Reuse Network Ireland (CRNI) and other similar networks to develop a network of reuse/upcycling activities and promotional events.	The RWMPO engage on an ongoing basis with CRNI and each organisation promotes the other's activities, through social media and also through specific events, such as during Reuse Month. Examples of engagement with individual enterprises that are members of CRNI include Back2New upcycling in Newcastle West, Duhallow Enterprises in Kanturk, Revamp furniture upcycling in Co. Longford and EcoMattress in Dublin. This policy action remains relevant for consideration in the revised or replacement Plan.
C.2.1 Review/introduce presentation of waste byelaws, across the region, to maximise the quantity and quality of recyclable waste collected and amend/replace/introduce new byelaws if appropriate.	The existing waste presentation byelaws in the local authorities in each of the three regions were reviewed and a template produced for new byelaws to be adapted by each local authority. Through guidance and the template, this uniform approach to the byelaws has helped to ensure a consistent approach is taken across the local authorities, with some local variations as required in specific circumstances. The powers granted to the local authorities to introduce byelaws are under the Waste Management Act and the Local Government Act. This policy action remains relevant for consideration in the revised or replacement Plan in the event that any additional byelaws are needed in any future event.
C.2.2 Produce a code of practice for local authority authorised facilities to maximise the quantity and quality of material produced.	The RWMPO have confirmed that this Code of Practice has yet to be produced. There is an urgent need for a robust Code of Practice for facilities operating under a local authority permit or certificate of registration to drive consistency and best practice in environmental protection, reporting and waste outputs. Like the CAS review, this action remains relevant for the revised or replacement Plan but with an end date that will ensure early compliance.
C.3.1 Liaise with and support Economic Development Departments of local authorities in the identification of enterprises and potential clusters of enterprises for the development of secondary material markets	The RWMPO have engaged with Economic Development Departments, in particular the Local Enterprise Offices, to promote the general concept of waste hierarchy with priorities of prevention, reuse and preparation for reuse, recycling and recovery, as well as promotion of the Circular Economy in general. The RWMPO have participated in joint networking events and seminars involving the Local Enterprise Offices. Initiatives such as SMILE materials exchange, Green Business, EcoMerit Programme for SMEs and MODOS training were promoted strongly to the Local Enterprise Offices. Maintaining a market focus within the waste sector is important and the retention of this action in the revised or replacement Plan is required to facilitate the economic analysis and development of material markets and potentially indigenous infrastructure.
C.4.1 Prepare resource efficiency criteria for local authority waste related contracts.	The RWMPO have indicated that this review has yet to commence. As a consequence, there has been no general inclusion of resource efficient criteria in any contracts issued by the local authorities. There are individual projects whereby resource management has been applied to contracts, but no formal review of findings has been undertaken. One of the issues identified for failing to meet this policy action related to inconsistent approaches to procuring waste contractors and thereby measuring baseline waste data. The roll out of a more focussed GPP regime in the near future may drive this action

Policy Actions	Evaluation
	further within the revised or replacement Plan but again, there is a need for the local authorities to show leadership in green procurement of waste contractors.
C.4.2 Implement a systematic engagement with local or regional local authority procurement officers and the Office of Government Procurement (OGP) to ensure the inclusion of resource efficiency criteria in contracts.	The Regions' Prevention Officers took part in all workshops run as part of the Green Procurement GPP4Growth Interreg Project that was co-ordinated by DECC. The Prevention Officers advocated for green criteria and resource efficiency at these events which were attended by procurement officers and OGP staff. The EPA has initiated training in GPP for the public sector with a particular emphasis on those with procurement roles. Under the Programme for Government, all procurement using public funds will have to include green criteria by 2023. Engagement under this policy action has been implemented with the OGP as required. This engagement remains relevant for the revised or replacement Plan but it is recommended that the action be refocused to a deliverable or outcome of the engagement.
C.5.1 Encourage SMEs (including micro-enterprises) and industry to realise the environmental and economic benefits of resource efficiency.	The RWMPO have engaged with support agencies such as Local Enterprise Offices, Business in the Community Ireland, Communities Creating Jobs and EPA-funded initiatives through LAPN, Green Business and the Green Enterprise Programme. There were also links with related supports such as Enterprise Ireland's Lean and Green supports and regional Lean networks, as well as Skillnets Ireland networks. The importance of the SME and industry sector to waste management is reflected in setting this policy action. To date the engagement has been detailed and positive and this remains relevant for the revision of the Plan.

### 3.3.2 Policies

A short commentary on the policies of Strategic Objective C is presented in **Table 3.6** and these are informed by the policy action evaluations.

**Table 3.6: Evaluation of Policies for Strategic Objective C**

Policy	Evaluation
C.1 Establish reuse, repair, and preparing for reuse activities and networks to recirculate and extend the lifespan of items.	The RWMPO have been proactive and have successfully delivered the enterprise engagement requirements required under this policy to drive the broader messaging on reuse, repair, and preparing for reuse activities. However, the requirements to implement change at the local authority owned or operated CAS sites have not been achieved and the 2020 CAS review concluded that reuse and preparation for reuse and associated training/educational activities are inconsistent and unintegrated, with only a limited number of CAS active in this area. A recommendation to implement the findings of this review as a policy action for CAS has been noted. With a set of revised legislative targets for reuse under Regulation 31(2) of the European Union (Waste Directive) Regulations 2011-2020, this policy is given greater focus and the policy may be revised to focus on the key targets and timelines. In particular, the phased increase in re-use/recycling of municipal waste can be used to focus the establishment of activities and networks within the revised or replacement Plan. In addition, as set out in the Waste Action Plan for a Circular Economy 2020-2025, the imposition of a waste recovery levy of €5 per tonne on recovery operations at Municipal Solid Waste (MSW) Landfills, Waste to Energy Plants and Co-Incineration Plants and the Export of MSW may further help drive greater reuse and repair activities.
C.2 Optimise the value of recycled and residual waste resources in the system to turn these materials into reliable sources of secondary raw materials for reprocessing and recovery.	Regulation 31 of the European Union (Waste Directive) Regulations 2011-2020 allows for re-use networks to access waste held by collection schemes or facilities with a view to increasing the value of recycled and residual waste resources in the system. However, the actions under this policy indicate that there has been no development on the code of practice for local authority authorised facilities to maximise the quantity and quality of material produced. In addition, with the pending implementation of the CAS review, these actions are critical to ensure that the material outputs from these local authority-controlled facilities are optimised. This upstream optimisation is required to facilitate the generation of reliable sources of secondary raw materials for reprocessing and recovery. This policy remains relevant but requires greater urgency to implement change on the existing local authority controlled waste management sites.
C.3 Identify and promote the growth of secondary material markets and enterprises in the	While there has been ongoing successful engagement with local enterprises, as noted for policy C.2, the generation of reliable outputs from waste operators is a pre-requisite to the successful growth of secondary material markets. Again, the local authority-



Policy	Evaluation
region through regional and local supports.	controlled waste operators need to be consistent in best practice to facilitate this policy and this needs to be addressed in the revised or replacement Plan. Also noted in relation to this policy, there is a planned separate collection system for textiles in 2025 which may further contribute to this policy and this needs to be accounted for within the revised or replacement Plan.
C.4 Contribute to the greening of public procurement in local authorities through the inclusion of resource efficient criteria in all tendering processes related to waste plan activities.	The RWMPO have identified that there is currently no standard approach on green procurement adopted within the local authorities in relation to waste management. The absence of this standard has resulted in an inconsistent approach where some local authorities have been proactive and others have had limited compliance with this policy. To show stronger leadership there is a need for this policy to be strengthened in the revised Plan to compel all local and public authorities to show leadership and through the inclusion of resource efficient criteria in all tendering processes undertaken.
C.5 Work with and through business support agencies and the National Waste Prevention Programme to encourage businesses and industry to implement resource efficiency principles including the use of clean technologies and preventing waste at source.	The RWMPO have been successful in collaborating with business to promote the benefits of implementing resource efficiency principles. Stronger local authority leadership (e.g. through policy C.4) would lend greater credibility to the engagement and collaboration with enterprises on resource efficiency. This policy action remains relevant for the revised or replacement Plan.

### 3.3.3 Strategic Objective C

Overall the RWMPO achieved a generally high level of achievement of the actions under this objective with significant gains in developing collaborative networks and partnerships and furthering transition from a waste management economy to a green circular one. Areas for improvement relate to the local authorities' own operations both for waste sites and procurement of waste services which can be more effective through greater coordination.

The core of this objective, i.e. the transition from a waste management economy to a green circular economy, remains relevant and is strengthened by the policies outlined in the EU's second Circular Economy Action Plan (2020) and the Waste Action Plan for a Circular Economy (2020). In this regard, the objective was suitably future orientated when published in May 2015 and remains relevant for the revised or replacement Plan. The objective will be further strengthened through the introduction of additional legislative targets for the preparing for re-use and the recycling of waste materials introduced under the European Union (Waste Directive) Regulations 2011-2020 as follows:

- *By 2020, the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 % by weight;*
- *By 2020, the preparing for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste shall be increased to a minimum of 70 % by weight;*
- *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'.*

The RWMPO have successfully implemented the awareness and behaviour change elements under the policy and there have been comprehensive and frequent discussions with SMEs, industry, Local Enterprise Offices (LEOs) and other stakeholders such as the Community Reuse Network Ireland (CRNI). This positive engagement is in driving both the re-use/repair principles at waste generators as well as promoting the interest in markets for secondary materials and the re-use/repair industry. These elements of the policy have been positive and remain relevant for the revised or replacement Plan.

The development of markets for secondary materials does rely on a reliable and high-quality supply of these materials and the quality of the infrastructure is the key element for this supply. As noted, under Objective A, a detailed review of CAS infrastructure highlighted significant inconsistency in how these facilities undertake activities such as reuse and preparation for reuse with a lack of integration evident in this area. In addition, a planned code of practice for local authority waste facilities required under Objective C has yet to be delivered. Without these infrastructural actions being delivered, the source of materials suitable for re-use, repair or recycling remains inconsistent and unreliable. Implementing the actions arising from the review is a priority and the revised or replacement Plan is to support their delivery.

The revised or replacement Plan is to consider the following recommendations resulting from the evaluation:

- Given the ongoing transition, the Objective in its current form remains valid and relevant for the revised or replacement Plan;
- The updated targets for preparing for re-use and recycling to drive the further development of the re-use and repair industry;
- The implementation of the recommendations of the 2020 CAS review should be considered a priority to provide for a more integrated and consistent operation and to provide a higher quality waste output for re-use and repair;
- Developing a framework agreement for local authority CAS sites to consolidate the approach to segregating materials for reuse/preparing for reuse by compliance schemes and service providers; and
- The planned code of practice for local authority waste facilities is a priority to bring greater consistency to operations, management and prevention of wastes.

## 3.4 Strategic Objective D - Coordination

**Strategic Objective D: Coordinate the activities of the Regions and to work with relevant stakeholders to ensure the effective implementation of objectives.**

### 3.4.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective D is presented in **Table 3.7**. This indicated a high degree of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

**Table 3.7: Evaluation of Policy Actions for Strategic Objective D**

Policy Actions	Evaluation
D.1.1 Participate in relevant national groups to formulate waste policy and practice.	The RWMPO have participated in a range of national groups to formulate waste policy and practice. In many cases, a representative from one RWMPO has acted as a representative of the three RWMPO to streamline the process and maximise resource efficiency. This action is central to the role of the RWMPO and remains relevant for the revised or replacement Plan. As per current practice, the three regional coordinators can share this role to ensure resource efficiency. This collaborative approach supports the objective of a single plan to be implemented with regional focus.
D.2.1 Establish and/or maintain funded regional waste management office and the requisite structures (including administrative, technical & communication) to	A fully functioning RWMPO was established and maintained in each of the three Waste Management Regions throughout the lifetime of the RWMPs. All local authorities contributed the necessary funding each year throughout the plan to maintain the RWMPO with the assistance of annual grants from DECC. This action has served its purpose in establishing the offices and is relevant for the revised or replacement Plan in terms of maintaining these offices.

Policy Actions	Evaluation
implement national and regional policy.	
D.2.2 Establish or maintain a Regional Co-ordinator, Regional Resource Efficiency Officer, Regional Prevention Officer, Technical Officer and administrative support.	Each of the three RWMPO has maintained the roles specified for Regional Co-ordinator, Regional Resource Efficiency Officer, Regional Prevention Officer, Technical Officer. In some cases, these roles are combined, and one staff member has several roles. All local authorities have contributed the necessary funding each year throughout the plan to maintain the RWMPO. This action needs revision for the continued maintenance and resourcing of these roles. Funding needs to be continued by the local authorities to support these roles.
D.2.3 Identify training needs and coordinate future shared training to develop knowledge and expertise at regional & local level.	Throughout the implementation period a number of training needs were identified and the RWMPO collaborated and liaised with relevant agencies and training organisations to arrange training. This was administered through the RWMPO Team Development Plan and all staff undergo Continuous Professional Development including specific courses of study (professional diplomas, etc.). Where appropriate, the RWMPO also encouraged local authority personnel to attend relevant training arranged or delivered by other organisations. This action is central to the needs of the function of the RWMPO and remains relevant for the revised or replacement Plan while incorporating the duplicate requirement of policy action H.2.3.
D.3.1 Establish partnerships to build knowledge capacity and to promote higher order waste activities (prevention, reuse, resource efficiency and recycling).	The RWMPO and associated local authorities have forged partnerships and wide-ranging networks to promote higher order waste activities. A sample of some of the successful partnerships established includes the Rediscovery Centre, the Community Resource Network Ireland (CRNI), Charity Shop Association of Ireland (CSAI), Free Trade, National College of Art and Design (NCAD), Economic Development Department of DCC, Cré, NWCPO, Repak and the IWMA. This policy action remains relevant for the revised or replacement Plan.
D.4.1 Review European and national calls for funding in waste, resource and research areas to identify opportunities and partners in the region and make appropriate applications.	The RWMPO have participated in nine calls for funding and have assisted EAOs and organisations within the network both formally and informally with many more. This policy action remains relevant for the revised or replacement Plan.

### 3.4.2 Policies

A short commentary on the policies of Strategic Objective D is presented in **Table 3.8** and these are informed by the policy action evaluations.

**Table 3.8: Evaluation of Policies for Strategic Objective D**

Policy	Evaluation
D.1 The Lead Authority on behalf of the region will participate in the national waste co-ordination group and other national groups relevant to the implementation of the waste management plan	The RWMPO have actively participated in a number of national waste co-ordination groups as outlined under policy action D.1.1 and this ensures that the RWMPO are at the forefront of policy decision making. This policy remains relevant for the revised or replacement Plan but it would benefit from a more general wording given the range of national waste groups currently in place and likely evolving through the Waste Action Plan for a Circular Economy 2020-2025.
D.2 The Lead Authority and local authorities will work together on the structures required to implement the waste plan, capacity building, training and knowledge share on delivering waste management activities.	Each of the structures required under this policy in terms of setting up the office, the personnel and training these personnel have all been successfully implemented by the RWMPO in conjunction with the local authorities. This policy has been largely implemented and is of relevance post the transition from regional plans to a single national plan. Some policy is required to ensure that funding is maintained for the RWMPO from the local authorities.
D.3 Foster links and activities with relevant stakeholders including businesses and Industry Groups, NGO's and other relevant networks (including cross-bordering networks) to extend the reach of the plan.	The RWMPO have been very proactive in applying this policy and developing collaborative links with other waste operators and further details are presented in relation to policy action D.3.1. These links have fostered collaboration and wider synergies in higher waste hierarchy and crisis co-ordination activities and this successful policy remains relevant for consideration for the revised or replacement Plan.

Policy	Evaluation
D.4 Work with key stakeholders, including government and industry operators, on the funding of local authority waste activities in the region and co-ordinate applications for relevant national and European funding.	Similarly, the RWMPO have sought to participate in funding for research and innovation and have had some success in this matter as listed in the review of policy action D.4.1. The RWMPO are establishing links with research institutions to further strengthen the RWMPO offering for future research calls. This policy action remains relevant for consideration in the revised or replacement Plan.

### 3.4.3 Strategic Objective D

On establishing the structures for the three RWMP, a number of implementation policy actions applied under this objective to ensure effective coordination and implementation of policies. This has been achieved and the established structures will support the transition from a regional to national planning structure.

The revised or replacement Plan is to consider the following resulting from the evaluation:

- The overall focus of coordination within the objective remains relevant for the revised or replacement Plan but may move away from the development of the regional structures to maintenance of these structures under the Plan;
- Ongoing funding of the RWMPO will be required to maintain and build on the programme of delivery achieved under the current plans; and
- In relation to wider coordination, the RWMPO have fully committed to, and implemented, the policies on engagement with national policy makers, regulators, and research institutes. These collaborations and partnerships are a key cornerstone for the implementation of the existing plans and will inform the policy framework of the revised or replacement Plan.

## 3.5 Strategic Objective E - Infrastructure Planning

**Strategic Objective E: The Region will promote sustainable waste management treatment in keeping with the waste hierarchy and the move towards a circular economy and greater self-sufficiency.**

### 3.5.1 Policy Actions

No policy actions have been assigned to Objective E on infrastructure but the evaluation of the policies is presented in **Table 3.9**.

### 3.5.2 Policies

The policies in **Table 3.9** have been evaluated based on a review of the:

- RWMPO published bulletins on Waste Treatment Capacity Analysis which provides quarterly updates on waste recovery, disposal and export treatment and capacity
- Tracker of future capacity in the planning/licensing pipeline.

In addition, a range of additional sources have been referenced including the EPA website on waste statistics, EPA licensing portal, An Bord Pleanála website and local authority planning files and other supporting data.



Table 3.9: Evaluation of Policies for Strategic Objective E

Policy	Evaluation
E1 Future authorisations by the local authorities, the EPA and An Bord Pleanála of pre-treatment capacity must take account of the authorised and available capacity in the market while being satisfied the type of processing activity being proposed meets the requirements of policy E2.	<p>A pre-treatment activity is defined as <i>'the processing of waste which still results in a waste which subsequently undergoes other waste recovery or disposal treatment'</i>. In May 2015 the RWMP reported the following levels of pre-treatment within the regions:</p> <ul style="list-style-type: none"> <li>• 2.4 million tonnes in the Eastern Midland Region (53% of authorised treatment capacity);</li> <li>• 2.6 million tonnes in the Connacht Ulster Region (55% of authorised treatment capacity); and</li> <li>• 2.4 million tonnes in the Southern Region (53% of authorised treatment capacity).</li> </ul> <p>It is recommended that a more detailed review of these capacities in 2021 is undertaken to inform the revised or replacement Plan.</p>
E2 The future authorisation of pre-treatment activities by local authorities over the plan period will be contingent on the operator demonstrating that the treatment is necessary, and the proposed activities will improve the quality and add value to the output materials generated at the site.	
E3a The local authorities in the region will maintain and develop their existing networks of bring infrastructure (e.g. civic amenity facilities, bring banks) to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes.	<p>There are 96 CAS operating within the State. The RWMPO undertook a detailed review of a selection of these CAS operations and a final report has been prepared in late 2020. The review identified an inconsistent approach to the facilitation of recycling and recovery of hazardous and non-hazardous municipal wastes. The report recommends the development of an integrated, consolidated and coordinated CAS network and that a CAS operating standard be developed to eliminate these inconsistencies. This standard will require CAS to maintain and develop infrastructure to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes to align with this policy.</p>
E3b The Plan supports the development by the private sector of public bring infrastructure (e.g. civic amenity facilities, bring banks) subject to appropriate statutory approvals and in line with appropriate environmental protection criteria.	<p>The private sector currently operate a number of CAS facilities within Ireland. The CAS review report recommends that these privately operated CAS be invited to meet the appropriate standards and to participate in the network and to benefit from the 'strength in numbers' effect of coordination with the network.</p>
E4 The local authorities may include as a condition of planning that developers of commercial and large-scale residential developments provide bring bank facilities to serve occupants and residents.	<p>Large residential developments are now assessed as Strategic Housing Development by An Bord Pleanála. Typically, these permissions include a requirement for <i>'A plan containing details for the management of waste (and, in particular, recyclable materials) within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials and for the ongoing operation of these facilities.'</i> This required plan needs to be prepared and agreed with the planning authority in writing prior to the commencement of development. An Bord Pleanála includes similar conditions for larger commercial developments such as shopping centres. Local authority permissions are more varied with a mixed application of planning conditions.</p>
E5 Local authorities will explore the possibility of accepting hazardous waste at existing civic amenity facilities from small businesses, which is similar in nature to household hazardous wastes currently received. A charge may be introduced for such a service.	<p>Some CAS currently accept hazardous waste but the approach to acceptance, limiting and charging for these wastes is inconsistent. The development of a standard procedure for these sites will greatly enhance consistency. This will be considered in the designation of sites when the implementation of the recommendations of CAS review is put in motion.</p> <p>Also of relevance is the recent amendment to Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020, which requires that the minister, EPA or the local authorities shall, by January 2025, set up separate collection for hazardous waste fractions produced by households. This pending change will have to be accounted for within the revised or replacement Plan and how this collection may affect the CAS function.</p>
E6 The local authorities may require waste developers	<p>A high-level screening has been undertaken of Waste Facility Permits (WFP) and Certificate of Registrations (CoR) issued by local authorities as listed in the central</p>

Policy	Evaluation
seeking a waste facility permit to develop a Class 10 waste treatment activity, as defined by the Third Schedule: Part I of the Waste Management (Facility Permit and Registration) Regulations 2007 (as amended), to provide bring facilities for the acceptance of non-hazardous wastes from members of the public and businesses.	<p>register hosted by the National Waste Collection Permit Office (NWCPO). This screening indicates that there has been no evidence of significant implementation of this policy and none of the WFP or CoR reviewed had applied to develop a Class 10 waste treatment activity. There may be operational and/or liability issues associated with the provision of public access to a permitted site and this policy, while welcome, may not be practical and its renewal should be reconsidered for the revised or replacement Plan.</p>
E7 The local authorities in the region will continue to work with the EPA and other key stakeholders to support the collection of hazardous farm waste from designated bring centres e.g. marts.	<p>In 2020, the EPA published the <i>'Farm Hazardous Waste Collections 2013–2017'</i> report which provides a detailed summary and analysis of the farm hazardous waste (FHW) collections that were operated within the timeframe. The project was a collaboration between various agencies including the EPA and the local authorities. The report noted recommendations on the collection scheme for farm waste including the provision of permanent bring centres as well as a direct collection. The development of these bring centres at key locations, such as marts, should be considered further in the revised or replacement Plan.</p> <p>The RWMPO and the Department of Agriculture, Food and the Marine (DAFM) have engaged in preliminary discussions on the requirements for the execution of a pilot scheme for a National Hazardous Waste Disposal Scheme. Any Pilot Project will take account of the findings of the Farm Hazardous Waste Collection Report and the national obligations relating to Antimicrobials and Pesticides which is required by legislation to be in place by 2022.</p>
E8 The waste plan supports the development of disposal capacity for the treatment of hazardous wastes at existing landfill facilities in the region subject to the appropriate statutory approvals being granted in line with the appropriate environmental protection criteria.	<p>In November 2020, An Bord Pleanála refused permission for the planned expansion at Drehid Landfill which included 85,000 tonnes per annum hazardous waste landfill capacity. The reasons for refusal related to environmental protection. Knockharley Landfill have recently received approval for a range of changes at the site including capacity to accept up to 5,000 tonnes per annum of stable non-reactive hazardous waste. The EPA license application decision is awaited which will also apply the appropriate environmental protection criteria. This policy remains valid and the EIA and AA processes indicate that the appropriate environmental protection criteria are being routinely applied by the Regulators and this policy remains relevant for the revised or replacement Plan and aligned with the EPA's revision to the National Hazardous Waste Management Plan policies (due for publication in 2021).</p>
E9a The on-going availability of disposal facilities for non-hazardous municipal residual wastes in the region will be required during the plan period. The local authorities consider there is no need to provide additional disposal facilities for residual wastes over and above the existing authorised (i.e. operational, inactive or uncommenced) facilities in place.	<p>On a quarterly basis, the RWMPO collaborate to release up to date bulletins on Waste Treatment Capacity Analysis. The data presented within these bulletins provides up to date details on the following:</p> <ul style="list-style-type: none"> <li>• Total annual disposal capacity within the active MSW landfills;</li> <li>• Quarterly landfill rate to each of the landfills;</li> <li>• Volume of void space used within the quarter; and</li> <li>• Remaining void space available for the year.</li> </ul> <p>The up to date bulletins are used to track landfill utilisation and highlight any emerging capacity issues within the disposal sector and identify alternative routes as required. These bulletins provide valuable data on recovery and export as well as disposal and these should be continued in line with this policy in the revised or replacement Plan.</p>
E9b The waste plan supports the need for on-going disposal capacity to be developed for on-site generated non-hazardous/hazardous industrial waste over the plan period.	<p>A number of the larger pharma-chem facilities in Ireland are licensed by the EPA to operate industrial incinerators for disposal of on-site non-hazardous/hazardous industrial waste. These consist of both liquid vapour incinerators (LVI) for treating solvents and solid waste incinerators (SWI) for treating contaminated PPE, packaging, etc. In recent years, the need for Solid Recovered Fuel (SRF) for the cement kilns has led to a general reduction in on-site disposal and the economic incentives to send this waste off site for blending and use of SRF has resulted in a reduced use of on-site LVI recovery. In addition, the costs to operate the LVI and SWI are increasing relative to sending material off site (or export) and there is a general reduction in the use of these facilities. The need for self-sufficiency and the proximity principle would support the continuation of this policy in the revised or replacement Plan.</p>
E10 The waste plan recognises the need for on-going disposal capacity to be available in	<p>A pertinent application of this policy occurred in 2016 when municipal residual waste capacity hit a serious deficit with limited WtE recovery capacity available. This required the implementation of emergency powers under the Waste Management Act to allow</p>

Policy	Evaluation
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 contingency capacity annually.	this material to be sent to landfill and the permitted exceedance of the EPA waste acceptance limits on a temporary basis at these landfills. The RWMPO quarterly bulletins provide significant value in tracking recovery and disposal capacity to project such incidents but this emergency policy remains relevant for the revised or replacement Plan to account for other unforeseen events, e.g. COVID-19. The RWMPO have produced the National Waste Contingency Strategy/Addendum which looks at the provision of short medium and longer term contingency capacity and the protocol for using this capacity.
E11 The plan supports the consideration of appropriate alternative future land uses at authorised inactive landfills (un-commenced, permanently closed, or temporarily closed) subject to amendments to existing approvals being put in place. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure protection and preservation of the Natura 2000 Network. Potential activities include: <ul style="list-style-type: none"> <li>Waste treatment activities including pre-treatment, thermal recovery, biological treatment, reprocessing or preparing for reuse;</li> <li>On-site temporary storage of waste and materials;</li> <li>Co-location of utility services such as wind farms or other energy generating activities;</li> <li>Development of public and recreational amenities;</li> <li>Co-locating recycling/reuse waste enterprises on site;</li> <li>Resource mining; and</li> <li>Contingency capacity for crisis events such as risks to the environment and to the health of humans and livestock.</li> </ul>	<p>Authorised landfill sites remain an attractive option for the development of alternative land uses such as those listed under the policy. In particular, the development of operations that combine recovery and renewable energy (such as anaerobic digestion (AD)) are well suited given the established gas engines and grid connection at these sites. In addition, the land use zoning would support the development of a broad range of waste activities at these landfills. However, local authorities have shown limited appetite for such development over the plan period.</p> <p>There has been significant development of public and recreational amenities with a number of former municipal landfills converted to public parks – e.g. the former Kinsale Road Landfill is now Tramore Valley Park with walkways, BMX facilities and open parkland. Similar transitions are being undertaken at Ballyogan and Kerdiffstown. To inform these transitions, the EPA have published a report '<i>Beneficial Use of Old Landfills as a Parkland Amenity</i>' in 2017.</p> <p>There has been limited or no application of uses such as utility services or resource mining though these potential uses remain valid.</p> <p>This policy remains relevant and it is recommended that a greater emphasis be placed on local authorities supporting the location of operations such as AD on former landfill sites where there are existing infrastructure capacities to support co-location.</p> <p>In August 2020, the Department of Agriculture, Food and the Marine (DAFM) published guidance on '<i>Woodland Creation on Public Lands</i>' which is a funding scheme that aims to conserve nature by developing permanent, non-commercial woodlands on suitable public land. The scheme acknowledges that certain former landfill sites or 'brownfield' sites may be suitable for woodland establishment.</p>
E12 The waste plan supports the repatriation of residual waste illegally disposed in Northern Ireland to licensed disposal facilities appointed to a framework set up on behalf of the State by the National Trans Frontier Shipment Office.	The repatriation of this waste is currently on hold due to on-going capacity shortages annually. This policy action remains relevant for the revised or replacement Plan.
E13 Future authorisations by the local authorities, the EPA and An Bord Pleanála must take account of the scale and availability of existing back filling capacity.	Backfilling of inert waste is regulated by the local authorities through WFP and CoR and by the EPA through soil recovery facilities. The RWMPO prepare periodic reports to quantify and analyse the national capacity within the market for the management of arisings of soil and stone material with the latest report prepared in 2020. While these reports are published, there is clear inconsistency in how the RWMPO are consulted by the relevant planning authority in making these planning determinations.
E14 The local authorities will co-ordinate the future authorisation	Within the revised or replacement Plan, due consideration should be given to establishing the RWMPO as a statutory body which will require the office to be

Policy	Evaluation
of backfilling sites in the region to ensure balanced development serves local and regional needs with a preference for large remediation sites ahead of smaller scale sites with shorter lifespans. All proposed sites for backfilling activities must comply with the siting criteria set out in the plan.	consulted and considered as a statutory body for infrastructure planning and consenting processes and inform on the relevant capacities. This policy action remains relevant for the revised or replacement Plan.
E15a The waste plan supports the development of up to 300,000 tonnes of additional thermal recovery capacity of non-hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market and the State's self-sufficiency requirements for the recovery of municipal waste are met. This capacity is a national treatment need and is not specific to the region. The extent of capacity determined reflects the predicted needs of the residual waste market to 2030 at the time of preparing the waste plan. Authorisation above this threshold will only be granted if the applicant justifies and verifies the need for the capacity and the authorities are satisfied it complies with national and regional waste policies and does not pose a risk to future recycling targets. All proposed sites for thermal recovery must comply with the siting criteria set out in the plan.	<p>On publication of the RWMP in May 2015 there was 435,000 tonnes per annum consented capacity for thermal treatment with a further 792,875 tonnes per annum pending. The total projected capacity assuming all pending was granted was 1,227,875 tonnes per annum and the review in 2015 suggested a further 300,000 tonnes nationally was required to take the total capacity to 1,527,875 tonnes per annum.</p> <p>Based on the 2020 thermal treatment development consented or within the planning/licensing regime there is an estimated 1,770,000 tonnes per annum of thermal treatment capacity within the pipeline.</p> <p>This would suggest that the required capacity under Policy E15a has been achieved by the developments in planning/licensing (subject to grant). However, the changing profile of waste recovery versus disposal and the ongoing reliance on exports may require further thermal treatment capacity.</p> <p>It is recommended that a detailed review of this capacity be conducted to inform the retention, modification or omission of this policy in the revised or replacement Plan. This review needs to consider the use of cement kilns as capacity option in Ireland as they are only available when there is a demand for cement product. This was an issue during the COVID-19 pandemic</p>
E15b The waste plan supports the need for thermal recovery capacity to be developed specifically for the on-site treatment of industrial process wastes and where justifiable the treatment of such wastes at merchant thermal recovery facilities.	This policy is analogous to the on-site disposal policy E9b on recovery. A number of larger pharma operators have on-site treatment of industrial process wastes but the evolving economics is driving the off-site treatment or export of wastes from these sites to other operators. The retention of this policy is in line with the proximity principle and self-sufficiency but the retention within the revised or replacement Plan needs to be cognisant of the economic drivers that drive the need for on-site thermal recovery.
E16 The waste plan supports the development of up to 50,000 tonnes of additional thermal recovery capacity for the treatment of hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market to facilitate self-sufficiency needs where it is technically, economically and environmentally feasible. This capacity is a national treatment need and is not specific to the region. All proposed sites for thermal recovery must comply with the environmental	<p>At present, the Carranstown WtE facility is licensed to accept up to 10,000 tonnes per annum of specified hazardous wastes. The Platin Cement Plant has planning permission to accept up to 50,000 tonnes per annum hazardous waste but a licence has yet to be granted. In 2021, the Ringaskiddy WtE facility has had the planning consent granted overturned in the courts and the future of this development is uncertain.</p> <p>It is recommended that a detailed review of this capacity is needed to inform the retention, modification or omission of this policy in the revised or replacement Plan.</p>



Policy	Evaluation
protection criteria set out in the plan.	
E17 The waste plan supports the development in the region of at least 40,000 tonnes* of additional biological treatment capacity for the treatment of bio-wastes (food waste and green waste) primarily from the region to ensure there is adequate active and competitive treatment in the market. The development of such treatment facilities needs to comply with the relevant environmental protection criteria in the plan. <i>*Note this figure is 75,000 tonnes in the EMR region.</i>	In May 2015, the RWMP reported a national capacity of 246,000 tonnes of treatment waste for organic wastes as authorised by the Department of Agriculture, Food and the Marine with the following regional breakdown: <ul style="list-style-type: none"> <li>• 58,000 tonnes in the Easter Midland Region;</li> <li>• 40,000 tonnes in the Connacht Ulster Region; and</li> <li>• 137,300 tonnes in the Southern Region.</li> </ul> Policy E17 varies between the three regions but combined the policy proposes 155,000 tonnes of additional capacity on top of the existing 246,000 tonnes per annum. The latest data from the EPA estimates that there are 687,660 tonnes per annum of biological treatment capacity (including composting, anaerobic digestion and bio stabilisation of organic fines). This data suggests that the capacities proposed within policy E17 have been achieved and exceeded over the plan period. Notwithstanding this achievement, it is recommended that a more detailed assessment of current and projected treatment capacity is undertaken to inform the revised or replacement Plan. It is also noted that the revision to Regulation 38 of the European Union (Waste Directive) Regulations 2011-2020 has implications for this policy. By the 31 <sup>st</sup> of December 2023 bio-waste must be either separated and recycled at source or collected separately and not mixed with other types of waste.
E18 The waste plan supports the development of biological treatment capacity in the region, in particular anaerobic digestion, to primarily treat suitable agri-wastes and other organic wastes including industrial organic waste. The development of such treatment facilities needs to comply with the relevant environmental protection criteria in the plan.	
E19 The waste plan supports the development of indigenous reprocessing and recycling capacity for the treatment of non-hazardous and hazardous wastes where technically, economically and environmentally practicable. The relevant environmental protection criteria for the planning and development of such activities need to be applied.	In relation to hazardous wastes, the EPA is currently revising the National Hazardous Waste Management Plan and this is due for publication in 2021. The policies within this plan, coupled with the projected waste outputs from the annual EPA waste reports, ultimately dictate the potential of indigenous reprocessing and recycling capacity. Similarly, for non-hazardous wastes, the volumes and quality of the waste streams generated are key considerations for the development of infrastructure. Current barriers include low export costs and insufficient throughput to facilitate a viable treatment investment within the State. However, some indigenous reprocessing and recycling development has been successful (e.g. waste oil) and this policy remains relevant for the revised or replacement Plan.
E20 The waste plan supports the development of repair and preparing for reuse enterprises in the region as part of the transition to a more resource focused management approach and will provide technical, regulatory and financial guidance to operators active on this tier of the hierarchy.	This policy remains relevant with core circular economy principles applicable in the revised or replacement Plan. With the planned integration and consolidation of CAS network there may be an improved output from these sites that may further develop the repair and reuse opportunities. Also, of note is the amendment to Regulation 31 of the European Union (Waste Directive) Regulations 2011-2020. The revision requires measures to promote preparing for re-use activities, notably by encouraging the establishment of, and support for, preparing for re-use and repair networks, by facilitating, where compatible with proper waste management, their access to waste held by collection schemes or facilities.
E21 The local authorities will review the approach to authorising waste treatment facilities requiring a waste facility permit or certificate of registration having regard to the need to achieve consistency of approach between planning approval and operational capacity.	The National Waste Collection Permit Office (NWCPO) has established a Local Authority Waste Facility Register ( <a href="http://facilityregister.nwcpo.ie/">http://facilityregister.nwcpo.ie/</a> ) that contains a searchable database of Waste Facility Permits and Certificates of Registration. This allows for full transparency to the general public on the permitting system and allows the local authorities to view current practice when setting infrastructure, handling, emissions, and other controls when authorising these waste treatment facilities. Also, of note is policy action C.2.2 which requires a code of practice for local authority authorised facilities to maximise the quantity and quality of material produced. This

Policy	Evaluation
	code of practice has yet to be produced but will further aid in the consistent setting of permit controls.
E22a The plan supports the primacy of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented.	Most households (approx. 80%) in Ireland are served with kerbside collections in either a two-bin or three-bin service. This policy action remains relevant for the revised or replacement Plan. The Waste Action Plan for a Circular Economy provides for a more enhanced role for the WERLAs who will have responsibility for the monitoring and enforcement of Household Waste Kerbside Collectors in each region. This will include collection, recovery and disposal of the different household waste streams collected at kerbside. The consultation paper on Ireland's Deposit Return Scheme (DRS) sets out how PET plastic bottles and aluminium drinks cans will be introduced to allow for greater recycling of these streams through retailer take back schemes which will also aid in kerbside segregation. It is also noted that Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020 requires that by the 1 <sup>st</sup> January 2025 a separate collection is set up for hazardous waste fractions produced by households. The details of this collection system are not yet clear; this will need to be addressed in the revised or replacement Plan for implementation and any modification to policy E22a noted accordingly.
E22b The plan also supports the use of authorised civic amenity facilities and bring centres as part of the integrated collection system.	The 2020 CAS report contains a series of recommendations on integration and consolidation of the CAS network and the implementation of its recommendations will be a requirement of the revised or replacement Plan. In this regard, the CAS will offer a more integrated network of sites in line with this policy.
E23 In the absence of kerbside source segregated collection services and where the proximity of civic amenity facilities and bring centres is prohibitive the plan supports localised collection solutions such as community drop off points or pay to use systems subject to compliance with the household waste collection regulations.	This policy action remains relevant for the revised or replacement Plan.
E24 The plan supports the appropriate management of international catering waste ICW under the Animal By-product Regulations (EC) No.1069/2009.	This policy action remains relevant for the revised or replacement Plan.
E25 The plan supports the improvement of existing PRIs and the development of new PRIs or similar industry/voluntary schemes for specific waste streams including but not limited to human and farm chemicals and medicines, paints, newspapers and magazines and bulky waste.	This policy action remains relevant for the revised or replacement Plan. It is also noted that the Waste Action Plan for a Circular Economy 2020-2025 commits to establishing a new extended producer responsibility scheme for single use plastics (SUP), extend the current tyre scheme and consider the following waste streams: <ul style="list-style-type: none"> <li>• Textiles;</li> <li>• Bulky waste including mattresses;</li> <li>• Paint;</li> <li>• Medicines; and</li> <li>• Farm hazardous waste.</li> </ul> The plan also commits to a revision of the current approaches to the EPR approval process, governance, transparency and financial rules to improve circularity. It is also noted that the new Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020 set out further rules and details for extended producer responsibility schemes.

### 3.5.3 Strategic Objective E

While there have been significant developments in sustainable waste management treatment infrastructure since the publication of the RWMP in May 2015, there remains scope for future developments under this objective. These developments need to be informed by analysis of existing and predicted generation rates

and treatment capacities to reduce the need for export and increase the role of higher waste activities such re-use, repair and recycle.

The revised or replacement Plan is to consider the following findings resulting from the evaluation:

- The wording of this objective remains strong and relevant;
- Establishing the RWMPO as a statutory body will provide a clear legislative role for the office to formally advise planning authorities on relevant policies, data and treatment capacity for waste infrastructure development;
- Completing a detailed inventory of national and regional final treatment (e.g. disposal, thermal treatment, biological, recycling) capacity, existing and planned. This is to include both existing and projected capacity taking account of reducing reliance on landfill as well as the principles of self-sufficiency. This process can inform the need for additional capacity to be mandated in the infrastructure policies;
- The consolidation and integration recommendations from the 2020 CAS review should be implemented to bring greater consistency in operation and output of these facilities;
- Further consideration of permanent or temporary bring centres for hazardous farm wastes to ensure this import infrastructure is supplied to manage this waste stream; and
- There is limited evidence of proactive land use planning by local authorities for future waste infrastructure. While city and county development plans are reviewed on a cyclical basis, the provision of policies or zoning for new waste infrastructure is largely absent from many land use plans. The introduction of new guidance for siting waste infrastructure is required to strengthen the locating of new facilities and minimise the impact on communities, business, ecosystems and environmental receptors.

### 3.6 Strategic Objective F - Enforcement and Regulation

**Strategic Objective F: The Region will implement a consistent and coordinated system for the regulation and enforcement of waste activities in cooperation with other environmental regulators and enforcement bodies.**

#### 3.6.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective F is presented in **Table 3.10**. The Waste Enforcement Regional Lead Authorities (WERLA) coordinate and support local authority waste enforcement. The data used to undertake this evaluation is taken from the WERLA annual reports for the plan period based on local authority enforcement activities. The evaluation indicates a high degree of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

**Table 3.10: Evaluation of Policy Actions for Strategic Objective F**

Policy Actions	Evaluation
F.1.1 Allocate resources to the systematic monitoring of household compliance with the segregation of waste with a particular focus on prioritising the reduction of contamination.	The WERLA commit ongoing resources to household waste inspections and report the numbers of inspections annually. In 2019, the WERLA undertook 8,491 household waste surveys (including monitoring of compliance with segregation requirements) and a further 1,421 household food waste inspections under this policy action (food waste surveys reduced from 3,092 household food waste inspections in 2018). This policy action remains relevant for the revised or replacement Plan with additional resources as required to support the WERLA enforcement function.
F.1.2 Allocate resources to the systematic monitoring of apartment complexes to	Apartments accounted for 12% of households in the State in 2016. However, there is no record available of the level of enforcement undertaken by the WERLA in this policy action. While significant enforcement has been undertaken on household and

Policy Actions	Evaluation
improve compliance with the segregation of waste prioritising the reduction of contamination.	commercial wastes, apartments have not been targeted, or if targeted, these inspections have not been clearly delineated from the enforcement data reported. It is noted that local authorities have used the presentation of waste byelaws at various locations to improve waste segregation at apartment blocks. With the necessary regulatory change in place to allow for apartment waste statistics to be either recorded with households, or as a separate but more targeted waste stream, this policy action remains relevant for the revised or replacement Plan.
F.1.3 Allocate resources to the national systematic monitoring of waste collectors including on-site audits of waste collection data and random roadside checks for compliance with permit conditions.	The WERLA report that there are 2,013 authorised waste collectors operating within the State in 2020 with 922 in the Eastern Midlands Region, 705 in the Southern Region and 425 in the Connacht Ulster Region. Inspection visits are undertaken annually and in 2019, the WERLA recorded 1,592 inspections of Waste Facility Permits and a further 226 multi agency inspections. The RWMPO validate Annual Returns (AR) of a selected number of WCP and AFP to ascertain the accuracy of data submitted to the NWCP. The 2019 validation report was the fourth in the series and identified significant difference in the quality and accuracy of the data between the household and commercial waste collectors and the waste operators in the C&D sector. It is recommended to develop a risk based section criteria for future validation to focus on the higher risk operators and drive greater accuracy. This action is needed to further drive the need for enforcement of these waste collectors. In addition, the requirement for an assessment of existing waste collection schemes to inform the revised or replacement Plan and the timescale for a wider EU driven segregated collection will need to be taken into account in any revised action.
F.1.4 Allocate resources to monitor the schedule for the roll-out of brown bins to households in accordance with the European Union (household food waste and Bio-Waste) Regulations 2013.	Throughout 2019, considerable effort has been expended by the WERLA to ensure that the provision of a kerbside waste collection service includes the direct provision of a 'Brown Bin' to households in agglomerations > 500 persons in line with the European Union (Household Food Waste and Bio-Waste) Regulations 2015. This enforcement effort has included: <ul style="list-style-type: none"> <li>• Inspections under the Presentation of Waste Bye Laws to ensure that Householders are source segregating their waste;</li> <li>• Audits of Household Waste Collectors;</li> <li>• Referral of Household Waste collection permits for review by NWCP;</li> <li>• Serving of Notices under Section 18 of the WMA on Household Waste Collectors to provide information on a monthly basis as to compliance with the Food Waste Regulations;</li> <li>• Serving of Notices under Regulation 10 of the Food Waste Regulations seeking information on the direct provision of Brown Bins;</li> <li>• Prosecutions of Household Waste Collectors for not providing the Brown Bin to their customers; and</li> <li>• Seeking an order in the High Court requiring the direct provision of the Brown Bin to customers.</li> </ul> This policy action remains relevant for the revised or replacement Plan with supporting implementation to further establish brown bins at commercial waste collections as well as to support the requirements for a separate collection system by December 2023.
F.2.1 Prepare a regional RMCEI plan to prioritise enforcement actions and activities across the region taking account of the national enforcement priorities laid down by the EPA, DECLG and PROs.	The WERLA work with the EPA to continuously streamline the annual inspection plans developed under RMCEI process in relation to the waste function in Local Authorities. This coordination is to ensure the local authority waste enforcement plans across the regions are consistent with the national waste priorities. This policy action remains relevant for the revised or replacement Plan to guide the ongoing enforcement policy and practice in a consistent manner. With the increased role, capacity and responsibilities of the WERLA as proposed under the Waste Action Plan for a Circular Economy 2020-2025, the scope and nature of the future enforcement may also be modified and this should be considered in any rewording of the revised Plan.
F.2.2 Work in partnership with the compliance schemes and other bodies to address ongoing regulatory obligations.	In 2019, the WERLA recorded 611 inspections in relation to the Producer Responsibility Initiative (PRI) for the management of tyres and waste tyres (down from 947 inspections in 2018). Inspections focused on unregistered and revoked tyre retailers operating outside the regulatory framework. The pilot packaging enforcement project commenced in 2017 and is ongoing on a yearly basis. The project focuses on suspected major producers of packaging who are not meeting their obligations under the regulations. The WERLA also collaborated with WEEE Ireland, the European Recycling Platform Ireland DAC and the ELVES End-of-Life-Vehicle (ELV) compliance scheme.



Policy Actions	Evaluation
	This policy action remains relevant for the revised or replacement Plan and suitably modified to account for the additional responsibilities the WERLA will have to cover the enforcement of Enforcement of Producer Responsibility Initiatives.
F.2.3 Maintain high level of site inspections of existing local authority waste authorisations and ensure that these are reflected in the RMCEI.	In 2019, the EPA have reported that there are 14,200 environmental licences/permits in the Local Authority Sector and 96% of these relate to waste activities. The WERLA report that over 41,000 waste inspections of these facilities were undertaken in 2018. This policy action remains relevant for the revised or replacement Plan.
F.2.4 Audit waste arisings from non-household waste premises (commercial and similar premises) to determine compliance with relevant regulations including commercial food waste regulations as reflected in the RMCEI.	In 2019, the WERLA undertook 1,476 commercial waste inspections under this policy action. This was an increase from 1,299 inspections in 2018. This policy action remains relevant for the revised or replacement Plan with additional resources as required to support the WERLA enforcement function. As noted under policy action F.1.3, the RWMPO undertake periodic validation the Annual Returns of a selected number of commercial premises. The findings of these validations exercised are published with the latest findings from the 2019 data validation published in January 2021.
F.3.1 Identify and maintain the role of Environmental Complaints Coordinator to manage an unauthorised waste activity database based on complaints received and monitoring undertaken.	The WERLA maintain a record of waste related complaints including both authorised and unauthorised waste activity with the following recorded in 2020: <ul style="list-style-type: none"> <li>Litter (excluding fly tipping and illegal dumping) - 49,204 complaints (98% investigation rate);</li> <li>Waste, non C&amp;D. Includes fly tipping and illegal dumping – 28,380 complaints (91% investigated); and</li> <li>Waste and C&amp;D - 850 complaints (91% investigated).</li> </ul> The outcomes of these annual complaint investigations have identified the following: <ul style="list-style-type: none"> <li>47 unauthorised waste facilities were identified at the end of 2018 by local authorities; and</li> <li>23 waste facility permits continuing to operate after their permit had expired at the end of 2018.</li> </ul> It is recommended that the policy action be modified to allow for a wider complaint investigation regime for waste activities.
F.3.2 Carry out investigations and issue notifications, as required, as dictated by the unauthorised waste activity database and as directed by the EPA.	The % of unauthorised waste complaints investigated in 2020 is highlighted above. Unauthorised waste activity was identified as a national priority for 2019 and, to this end, the WERLA developed Guidance Documents and corresponding procedures to support Local Authorities and to highlight best practice in terms of operational tactics and the use of social media in enforcing unauthorised waste activity. A number of successful legal actions were taken based on this guidance. This policy action remains relevant for the revised or replacement Plan as part of the policy actions on enforcement.
F.3.3 Prepare action plan (subject to AA screening) to deal with the prevention and management of waste from significant unauthorised activities and waste arisings from other criminal activities. Co-ordination required between the regions.	The WERLA prepare this action plan annually and circulate to all local authorities for RMCEI planning. The plan is maintained and updated throughout the year. It is unclear to what extent, if any, these reports are subject to Appropriate Assessment. Again, this policy remains valid and should be continued in the revised or replacement Plan. The need for Appropriate Assessment Screening for an enforcement plan is questioned and this should be reviewed as part of the AA assessment of the Plan in 2021.
F.4.1 Work with NWCPO to standardise Waste Collection Permit conditions with standard mandatory conditions and local discretionary conditions.	The WERLA and the NWCPO have an ongoing engagement on setting mandatory Waste Collection Permit conditions. All permits are now presented within a database on the NWCPO website for transparency and this will facilitate the ease of reference for conditions between permits. This policy action remains relevant for the revised or replacement Plan for implementation at a time when greater detail is available on the requirements for segregation of waste collection services.
F.4.2 Move to standardise conditions for Waste Facility Permit/COR conditions with standard mandatory conditions and local discretionary conditions.	This is similar to policy action C.2.2 which calls for a code of practice for local authority authorised facilities to maximise the quantity and quality of material produced. Standardised WFP templates have been prepared by the RWMPO. Checklists for key priority wastes have also been prepared to complement these templates. The RWMPO have published this package of measures in April 2021. This pending standardisation is valuable for the sector and this policy action remains relevant to support the continuous improvement within the sector with additional templates as required.

### 3.6.2 Policies

A short commentary on the policies of Strategic Objective F is presented in **Table 3.11** are these are informed by the policy action evaluations.

**Table 3.11: Evaluation of Policies for Strategic Objective F**

Policy	Evaluation
F1 Enhance the enforcement of regulations related to household waste to ensure householders, including apartment residents, and owners are managing waste in accordance with legislation and waste collectors are in compliance with regulatory requirements and collection permit conditions.	Compliance with this policy is generally good with a well-established regime of systematic monitoring and inspection undertaken of household waste segregation, waste collection and brown bin implementation. This enforcement action has been successfully enhanced through the plan period to develop the current well-established regime with associated training and side line campaigns. The revised legislative recycling targets for municipal waste may require additional enforcement action over the lifetime of the revised or replacement Plan to support future compliance. It is also noted that Regulation 38 of Waste Directive Regulations 2011-2020 requires that, by December 2023, bio-waste is either separated and recycled at source, or is collected separately and is not mixed with other types of waste. These developments indicate a likely increased enforcement function for the WERLA under the lifetime of the revised or replacement Plan.
F.2 Enforce all waste regulations through increased monitoring activities, and enforcement actions for non-compliance with authorisations and regulatory obligations.	The WERLA show a very high compliance rate with this policy and a very detailed inventory of inspection planning, inspections and associated enforcement actions is undertaken, recorded and reported in a series of annual reports. The Waste Action Plan for a Circular Economy 2020-2025 notes that the role, capacity and responsibilities of the WERLA are to be enhanced to position the local authority sector better to respond to emerging and priority enforcement challenges. These include a greater focus on food waste prevention, tracking compliance with the updated recycling targets, the planned changes to the Producer Responsibility Initiatives, etc. This evolving and enhanced role of the WERLA under the Waste Action Plan for a Circular Economy 2020-2025 will likely require some revision of the actions applied under this policy within the revised or replacement Plan.
F.3 Take measures to prevent and cease unauthorised waste activities by way of investigation, notifications, remediation requests or legal action as appropriate.	The WERLA activities have largely complied with the requirements of this policy to date under the RWMP. Significant resources have been applied to complaint investigation and wider inspections across the waste sector in each of the authorities. However, there is no data on the level of resourcing applied to unauthorised waste activity, but the anecdotal evidence suggests that these complaints are prioritised and investigated as part of the wider enforcement function. There are a series of ongoing enforcement actions at varying levels and these are all reported on an annual basis and illustrated with sample case studies and details of prosecutions. This policy remains central to waste enforcement within the revised or replacement Plan.
F.4 Improve the consistency of local authority waste authorisations and conditions as well as consistency of authority waste authorisations and setting associated conditions. To date, there has been limited formal movement on establishing consent consistency with the NWCPO and this needs to be reemphasised in the revised or replacement Plan along with clear implementation dates. Furthermore, the evolving nature of the waste streams collected, the greater emphasis on segregation, the potential inclusion of waste recycling targets and the requirements for financial provision are all emerging requirements that will require review and consideration for imposition to these consents under this policy.	Compliance with this policy has been limited over the plan period. Best practice local authority waste enforcement policy relies on a number of elements such as transparency, proportionality and consistency. There remains a need for consistency in consenting local authority waste authorisations and setting associated conditions. To date, there has been limited formal movement on establishing consent consistency with the NWCPO and this needs to be reemphasised in the revised or replacement Plan along with clear implementation dates. Furthermore, the evolving nature of the waste streams collected, the greater emphasis on segregation, the potential inclusion of waste recycling targets and the requirements for financial provision are all emerging requirements that will require review and consideration for imposition to these consents under this policy.

### 3.6.3 Strategic Objective F

Given the broad range of waste legislation that requires an enforcement function from the local authorities both on a routine and reactionary basis, there has been positive movement towards a consistent and coordinated system of regulatory activities by the WERLAs. While there are areas for greater implementation and consistency the application of this policy through the period of the plan has been largely delivered.

The EPA's '*Focus on Local Authority Environmental Enforcement - 2018 Performance Report*' (2020) provides a concise and independent critique of the local authority enforcement function. The EPA score the performance across a nine-point scale ranging from 'Unacceptable' to 'Exceptional' and over the course of the Plan period the waste enforcement function has been categorised as 'Target' or 'Above Target' which is a moderate score. The key areas for greater focus on enforcement as noted by the EPA are listed as follows:

- *Local authorities need to improve the quality and sharing of waste data with the relevant enforcement agencies. The quality and timeliness of waste data must be improved to provide critical intelligence to ensure that illegal waste activities can be detected and prevented.*
- *Local authorities should focus resources on identifying illegal waste activities. They should notify their Waste Enforcement Regional Lead Authority of any identified illegal waste sites and engage with it and other agencies to ensure that an appropriate and timely response is taken. This will require multiagency actions to ensure robust enforcement is taking place at difficult sites.*
- *Better waste segregation at source is required. Local authorities must focus on the householder and businesses who are responsible for the segregation of their waste to ensure that they are meeting their obligations. This includes focusing on waste streams including food waste and the provision and proper use of brown bins, and the proper segregation of commercial and demolition waste on the site where it is produced. This is likely to need a mix of educational actions and enforcement actions.*

The revised or replacement Plan is to consider the following findings resulting from the evaluation:

- The wording of this objective remains relevant;
- The Waste Action Plan for a Circular Economy 2020-2025 has noted that the role, capacity and responsibilities of the WERLA will be enhanced to position the Local Authority sector better to respond to emerging and priority enforcement challenges. This increased role needs to be clarified with suitable delivery framework set out;
- An expansion of activities for the WERLAs, as outlined in the Waste Action Plan for a Circular Economy 2020-2025 is being funded by DECC;
- The new recycling targets for municipal waste as well as the planned introduction of the recovery levy of €5 per tonne may encourage more unauthorised waste activity requiring greater enforcement; and
- Specific measures to tackle the volume of construction waste generated within the State and the historical and current challenges faced in managing this stream.

### 3.7 Strategic Objective G - Protection

**Strategic Objective G: Apply the relevant environmental and planning legislation to waste activities in order to protect the environment, in particular European sites, and human health against adverse impacts of waste generated.**

#### 3.7.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective G is presented in **Table 3.12**. This indicated a mixed level of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

**Table 3.12: Evaluation of Policy Actions for Strategic Objective G**

Policy Actions	Evaluation
G.1.1 Review local authority expenditure on lower waste order activities to determine if there is scope to deliver a more cost-effective service and balance expenditure across the hierarchy.	This policy action review has not been completed and there is no definitive information on % change in budget. The RWMPO have advised that undertaking this policy action and quantifying expenditure by these means is very difficult to achieve and the policy action in its current format has little value. However, while not reviewed formally under this policy action, performance is more generally reviewed as part of annual review when preparing the Annual Report for the Regional Waste Management Plan - the focus of the Plan is to move activities from lower levels to higher levels in the waste hierarchy.
G.2.1 Each region is to rank the class A high risk historic	The RWMPO have ranked all Class A high risk historic unregulated landfill sites as required under this action. The prioritisation action has been realised within the plan

Policy Actions	Evaluation
unregulated landfill sites (1977–1996).	period and this action is not required under the revised or replacement Plan and any requirements may be incorporated into action G.2.2.
G.2.2 Each region is to develop and agree a road map prioritising for investigation and remediation the ranked landfills (considering the scale of risk and impacts on the environment).	The local authorities agreed, via the Steering Groups, to prioritise the sites in accordance with the roadmap. This policy action remains valid and should be updated to require the roadmap prepared in 2016 to be updated within the timeframe of the revised or replacement Plan to include the findings of subsequent investigations.
G.2.3 Prepare authorisation applications to the EPA for landfill sites identified in accordance with the roadmap during the lifetime of the plan (subject to Department funding being available).	The individual local authorities are responsible for preparing and submitting the relevant applications to the EPA. In 2020 local authorities received funding to complete environmental risk assessments (ERA) and prepare authorisation applications for 64 unregulated landfills. This action remains relevant for the revised or replacement Plan to ensure that all landfills are identified and prioritised for funding and remediation as required.
G.2.4 Remediate high risk sites in accordance with the plan agreed in the EPA authorisation and in accordance with the requirements of the EU Habitats Directive & Water Framework Directive (subject to Department funding being available).	The RWMPO have established historic landfill officer posts with one full time position within the SR/CUR and one part-time position within the EMR. These posts are funded by DECC. The DECC has also established a national steering committee to monitor the roadmap this includes DECC and the RWMPO. As of the end of 2020, not all high-risk sites have been remediated. To date only two high risk sites have been remediated (Sherman's Co. Kilkenny & Moate, Co. Westmeath). The current status is listed as follows: <ul style="list-style-type: none"> <li>• Completion of Environmental Risk Assessment (ERA) - 16 of the high-risk sites are currently at Tier 2/Tier 3 investigation stages. Only 5 have a Tier 1 completed;</li> <li>• Certificate of Authorisation (CoA) application process - 9 of the high-risk sites area awaiting a decision on their CoA; and</li> <li>• Requirement to obtain planning approval from An Bord Pleanála - 7 of the sites with CoA granted need to obtain planning approval, prior to proceeding to remediation stage. It is anticipated that this number will increase further.</li> </ul> This policy action remains relevant for the revised or replacement Plan as clearly the requirements are still outstanding to remediate the landfills as required. The elongated remediation process will take time to sustainably execute these remediations and the timeframes for this policy action in the revised or replacement Plan need to be cognisant of same.
G.3.1 Prepare siting guidelines for waste facilities and review general environmental protection criteria as set down in the waste plan.	The RWMPO has reviewed the general environmental protection criteria set out in the waste plan and determined that it would be appropriate to prepare siting guidance. Draft guidance has been prepared but the Department of Housing, Local Government and Heritage has indicated the need to apply the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) process to inform this guidance document and this will be prepared within the revised waste management Plan. While the draft guidance has been devised, this has no basis for implementation or statutory footing at present. The upcoming waste plan development process will incorporate the draft guidance for siting waste infrastructure. This will strengthen the process for locating of new facilities and minimise future impacts on communities, business, ecosystems and environmental receptors.
G.3.2 Undertake a risk assessment of all waste disposal sites in coastal and estuarine areas to identify those at risk from coastal erosion in the short, medium and long term.	The County and City Management Association (CCMA) are preparing a broader national erosion study report which is being led by Fingal County Council. The RWMPO have requested that the risk assessment of waste sites are addressed within this study. Some localised erosion studies have been prepared which do address waste sites (e.g. Portrane Rush study addresses the risk to Ballealy Landfill), but these are limited. This policy action remains outstanding and a greater clarity on the timeframe for the CCMA erosion study is required to inform the modification of this policy action in the revised or replacement Plan. Depending on the level of risk, it may be prudent to include an action to develop either a waste sector adaption plan and/or compel individual operators to develop an adaption plan under the revised or replacement Plan.
G.4.1 Identify areas of low collection coverage and survey householders who are currently not availing of a household waste collection	In 2017, the Competition and Consumer Protection Commission (CCPC) was requested by government to carry out a study of the 'Operation of the Household Waste Collection Market'. The RWMPO made a submission to this process which again considered the issue of participation by households in kerbside collection systems. Current data indicates that 72% of households nationally are on kerbside systems, however the regional picture is varied with participation rates as low as 28% and as high as 99%.



Policy Actions	Evaluation
service to determine the cause.	There are a range of factors influencing participation including the availability of civic amenity sites, viability of certain routes, operational considerations and illegal dumping. This policy action has been completed and these low coverage areas have been identified by the RWMPO under the plan period. The focus in this area for the revised or replacement Plan should relate to improving the management options available to these households, such as through greater integration and standardisation of CAS.
G.4.2 Design and implement a programme to regulate, enforce and communicate in areas with low collection coverage, including the negative health and environmental impacts of burning/illegal dumping.	Local authorities implement ongoing awareness and enforcement programmes to promote good waste management practices. This has been strengthened by the awareness campaign and follow up enforcement regarding policy action C.2.1 under which there has been a campaign on reviewed / new waste presentation bylaws. The RWMPO have also worked closely with the WERLA in order to ensure waste management and waste enforcement work in tandem to effectively implement relevant policies and priorities. This work plan formed a core focus of the waste enforcement plans prepared by individual local authorities.  This policy action remains relevant for the revised or replacement Plan with the awareness elements tied into the new national communications and education programmes specified in the Waste Action Plan for a Circular Economy 2020-2025 as well as the new targets for recycling. Enforcement recommendations are presented elsewhere under the evaluation of Objective F.
G.4.3 Engage with authorised waste collectors to design solutions to serve communities or areas of low collection coverage and implement the solutions	There is ongoing engagement between the RWMPO and authorised waste collectors, but no specific review has been completed. The number of households with kerbside collection services per annum are as follows: <ul style="list-style-type: none"> <li>• 2015: 1,219,687 households with waste collection service nationally;</li> <li>• 2018: 1,328,220 households with waste collection service nationally; and</li> <li>• 2019: 1,315,242 households with waste collection service nationally.</li> </ul> The difficulties identified by the RWMPO in gathering information on collectors should be used to inform the development of this policy action and the action suitably revised to enable the need for more direct engagement between the RWMPO and the waste collectors in this area under the revised or replacement Plan.
G.5.1 As part of the statutory review process under the relevant waste regulations, the local authorities will examine relevant waste authorisations requiring local authority consent to determine if AA screening is required. In addition, the local authorities will prioritise reviews of waste authorisations and requirements for AA screening, in advance of any scheduled review, based on the proximity to or potential pathway of the permit holder to European Sites.	All local authority authorisations require AA screening in accordance with the European Communities (Birds & Natural Habitats) Regulations 2011. To assist the local authorities, the RWMPO prepared an AA screening template to allow authorities to make the determination if a Stage II Appropriate Assessment (the Natura Impact Statement) is required for any consent. The RWMPO also prepared training content, which was delivered, on behalf the RWMPO, by Aster Environmental. The Aster Environmental Training course is accredited with Engineers Ireland.  This policy action remains relevant for the revised or replacement Plan and potentially supplemented with further requirements on training and legal/technical support to local authorities in this area.

### 3.7.2 Policies

A short commentary on the policies of Strategic Objective G is presented in **Table 3.13** and these are informed by the policy action evaluations.

**Table 3.13: Evaluation of Policies for Strategic Objective G**

Policy	Evaluation
G.1 Ensure the highest environmental and human health benefits are achieved by prioritising the implementation of the upper tiers of the waste hierarchy	The implementation of this policy is somewhat achieved through the wider RWMPO function but there is no formal review and plan in place to prioritise funding and action for activities within the upper tiers of the waste hierarchy. It is noted that throughout this review there is clear evidence that the RWMPO are actively supporting and prompting these activities as per the policy. However, this policy should be modified as required to establish a framework for this prioritisation within the revised or replacement Plan that

Policy	Evaluation
and ensuring these actions are funded appropriately.	also accounts for the greater drive towards re-use and recycling in the Waste Action Plan and the evolving legislation.
G.2 Rollout the plan for remediating historic closed landfills prioritising actions to those sites which are the highest risk to the environment and human health.	Significant work has been undertaken through the plan period to identify and prioritise the historic closed landfills within each local authority. These elements are now complete and the process of undertaking the remediation works in priority order is being undertaken. However, progress through the remediation process is slow given the need for a significant period for site investigation and risk assessment, circa 12 months in the CoA application process and then a period to appoint and execute the necessary contractual works. These delays have slowed progress under this policy but the environmental protection required under this policy means that it remains a priority and the policy remains relevant for the revised or replacement Plan and the timelines for implementation reflective of current practice.
G.3 Ensure there is a consistent approach to the protection of the environment and communities through the authorisation of locations for the treatment of wastes.	Progress on this policy has been limited with draft siting guidelines prepared but these have yet to be implemented. Similar, the erosion risk assessment is underway but controlled by the CCMA and not the RWMPO. Without these spatial criteria to assist local authorities there is potential for inconsistencies and uncertainties in consenting and land use planning. It is noted that there is a lack of land use planning being provided for waste facilities in the development plans prepared in recent years. There is a need for this land use zoning and it is recommended that spatial information is provided as soon as practical under this policy under the revised or replacement Plan and furthermore, there is a requirement for local authorities to commit to zoning or policy setting for waste operations in land use planning.
G.4 Implement a co-ordinated approach to address unmanaged waste and the potential impact to the environment and human health.	There has been successful identification of areas of unmanaged waste collection areas by the CCPC and this information has provided a footprint of where additional services are required. Overall, the collection of household waste across the State has grown by 8% in the plan period but there remains the absence of a coherent single strategy to manage wastes in these areas. This strategy may include for increased collection or the implementation of a more integrated CAS network as noted elsewhere but it is recommended that this strategy is more clearly defined and actioned under this policy within the revised or replacement Plan.
G.5 Ensure that the implementation of the regional waste management plan does not prevent achievement of the conservation objectives of the EU Habitats and Birds Directive.	This policy action remains relevant for the revised or replacement Plan to ensure the ongoing protection of the Natura 2000 network. While the introduction of this policy has required additional resources and training for implementation by local authorities and has potentially delayed the consenting process at times, the protections offered to the natural capital within the State through this regime is fully aligned with EU and national environmental policy.

### 3.7.3 Strategic Objective G

The principles of protection to human health and the environment from waste operations are central to EU and national policy on the protection of the environment. As such, the intent of Strategic-Objective G remains a requirement for the revised or replacement Plan to ensure waste management in the State is sustainable and offers the highest levels of protection.

The revised or replacement Plan is to consider the following findings from the evaluation:

- The intent of the objective remains relevant;
- Much of the actions required under the policy relate to protection, i.e. the protection of human health and the environment (siting guidelines), the Natura 2000 network (Appropriate Assessment) and climate change (coastal erosion). These issues remain pertinent and require greater emphasis and urgency needs to be applied to equip local authorities to plan for and consent future waste infrastructure;
- Establishing the new siting guidelines for waste facilities which will be further informed by the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes;
- The creation of a climate adaption plan in conjunction with key stakeholders for the waste sector with a focus on the vulnerability and potential at risk infrastructure;
- The timeframes for the remediation of historic unregulated landfill sites has been significantly longer than estimated in the RWMP. While there has been some progress at strategic level in prioritisation, the implementation at site level remains slow. A strong emphasis on the delivery of the remediation of these sites needs to remain to minimise ongoing pollution risks; and
- There is a lack of a specific approach under the objective to address the reduction in unmanaged waste across the regions. While progress has been made on establishing where unmanaged waste arises, a clear and consistent means to increase collection and management is absent.

### 3.8 Strategic Objective H - Other Waste Streams

**The Region will establish policy measures for other waste streams not subject to EU and national waste management performance targets.**

#### 3.8.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective H is presented in **Table 3.14**. It should be noted that Policy Action H.2.1 is varied between the three RWMP and each of the three actions are addressed within the table. This indicated a mixed level of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

**Table 3.14: Evaluation of Policy Actions for Strategic Objective H**

Policy Actions	Evaluation
H.1.1 To engage with Irish Water in relation to national planning and management of wastewater treatment plant sludge and water treatment plant sludge.	In 2016, Irish Water published the first National Wastewater Sludge Management Plan (NWSMP) outlining the strategy for managing wastewater sludge over the next 25 years. An updated plan is due to be published in 2021. The total quantity of wastewater sludge generated in 2015 was 58,387 tonnes dry solids (tds) and over 98% of this was reused in agriculture. The quantity of wastewater sludge produced is expected to increase to 96,442 tds/annum by 2040. The RWMPO have yet to engage with Irish Water on this plan or the management of wastewater treatment plant sludge and water treatment plant sludge to develop policy action. The action needs to be delivered and it is recommended that the RWMPO engage with Irish Water annually to derive the policy action. In particular, the review of the National Wastewater Sludge Management Plan in 2021 should be aligned with the revised or replacement Plan to capture this waste stream.
H.1.2 To engage with the water pollution teams of the local authorities to ensure that	The local authorities actively record the quantities of septic tank waste collected annually. To date over the plan period, the Connacht-Ulster Region has collected 153,000 tonnes, the Eastern Midland Region has collected 256,000 tonnes and the Southern Region has collected 526,000 tonnes of septic tank waste (EWC 200304).

Policy Actions	Evaluation
environmental legislation and national guidelines are being implemented, including the inspection plan for the management of domestic wastewater treatment systems, and to review the management options for the disposal of septic tank sludge.	As with policy action H.1.1, it is recommended that there is greater engagement between the local authorities and Irish Water on reviewing the National Wastewater Sludge Management Plan in 2021, in particular the inspection plan, and the revised or replacement Plan, particularly in relation to sludge treatment capacity which is managed by Irish Water.
H.1.3 To engage with the NWCPO regarding specific conditions for private waste collectors collecting septic tank waste.	The RWMPO have yet to engage with the NWCPO regarding specific conditions for private waste collectors collecting septic tank waste. This action remains valid and it is recommended that this engagement is implemented in the revised or replacement Plan requiring the RWMPO to engage with the NWCPO regarding conditioning private waste collectors to standardising this operation and record keeping.
H.2.1 - Southern Region - To investigate the viability of running a pilot scheme for the management of paints.	A national pilot scheme for the management of paints commenced in 2021 through a partnership between the RWMPO, the Rediscovery Centre and Dulux Paints. The pilot scheme is likely to take a number of years to achieve national coverage which will be over the course of the revised or replacement Plan. This action should be cognisant of the emerging potential for paint to be managed through an EPR scheme as well as the evolving legislation on the need for collection of hazardous wastes from households.
H.2.1 Eastern Midland Region - To investigate the viability of running a pilot scheme for the management of medicines and waste oil.	The Eastern Midlands RWMPO investigated the possibility of rolling out a pilot scheme for medicines. The investigation identified that there were already a number of projects in this area - such as the DUMP scheme in Cork and Kerry, where pharmacists agree to take back medicines, either generally or on specified days. Currently the EPA is investigating the viability of extending this scheme, or a similar scheme, to operate nationally and the EPA is in consultation with the Irish Pharmacists Union on this matter. Given the potential legislative and policy changes impacting on these waste streams, these requirements should be revised accordingly to accommodate the legislative or Waste Action Plan for a Circular Economy 2020-2025 requirements. The evolving EPR regime will likely focus the policy on waste medicines and this approach is recommended in the revised or replacement Plan. The requirement under Regulation 37 for separate collection, prohibition on mixing and priority to treat waste oils by regeneration should also be accounted for within the new action within the revised or replacement Plan. Again, this EPR action is captured elsewhere and this action may be removed from the future plan in its current specific form with a more open requirement for pilot studies retained.
H.2.1 - Connacht Ulster Region To investigate the viability of running a pilot scheme for the management of farm chemicals.	This policy action was superseded by the successful work of the national hazardous waste working group and also the work carried out by the EPA on Farm Hazardous Waste. The viability of collecting farm hazardous waste has been shown to be highly effective based on the outcomes of the EPA scheme over the period 2013 and 2018. As such, this policy action may be amended in the revised or replacement Plan to an action on implementation within the EPR regime. Also refer to Policy E7, which notes recommendations on the collection scheme for farm waste including the provision of permanent bring centres as well as a direct collection. As above, this EPR action is captured elsewhere and this action may be removed from the future plan in its current specific form with a more open requirement for pilot studies retained.
H.2.2 Examine the possibility of expanding existing reuse schemes in place throughout the region.	The RWMPO work closely with reuse organisations such as CRNI members, the Rediscovery Centre, men's sheds, etc. A number of reuse material streams were examined for replication or expansion and research ideas and collaboration were explored. This action remains relevant for the revised or replacement Plan with the action aligned with the reuse streams and targets set in the European Union (Waste Directive) Regulations 2011-2020.
H.2.3 To transfer knowledge and skills on the successful schemes to all local authorities in all Regions.	The response to policy action D.2.3 identifies the approach taken to training and knowledge transfer within the RWMPO and the local authorities. Training needs are identified and applied as required to support the RWMP implementation. There is no specific reference to training on successful reuse schemes but it is considered that action D.2.3 could be suitably modified to accommodate action H.2.3 in the revised or replacement Plan.
H.3.1 Participate in working groups for setting up of new	Since 2016, the RWMPO have participated on a working group attended by the DECC, EPA, RWMPO, CRNI and social enterprise recycling organisations. The group commissioned a



Policy Actions	Evaluation
national producer responsibility schemes.	report and are working on the recommendations. Explorations regarding a EPR or PRI scheme are ongoing. The RWMPO should continue to participate in these working groups on producer responsibility schemes and this action remains relevant for the revised or replacement Plan and focussed on the requirements of Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020.
H.3.2 To ensure better segregation of hazardous waste and non-hazardous wastes at the point of collection from households and small businesses.	Since 2016, the RWMPO have been involved in Hazardous Waste Collection days in conjunction with the local authorities. These events offered citizens the opportunity to safely dispose of their hazardous wastes, including paint, medicines, fertilisers, pesticides, cleaning fluids etc. for free. The need for this policy action on household collection of hazardous waste should be superseded by any specific requirements implemented under Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020.

### 3.8.2 Policies

A short commentary on the policies of Strategic Objective H is presented in **Table 3.15** and these are informed by the policy action evaluations.

**Table 3.15: Evaluation of Policies for Strategic Objective H**

Policy	Evaluation
H.1 Work with the relevant stakeholders and take measures to ensure systems and facilities are in place for the safe and sustainable management of sludges (sewage, water works, agricultural, industrial, and septic tank) generated in the region having due regard to environmental legislation and prevailing national guidance documents, particularly in relation to the EU Habitats and Birds Directive.	As the party responsible for the management of treatment sludges, Irish Water published the National Wastewater Sludge Management Plan in 2016. The current end-use outlet for wastewater sludge in Ireland is almost exclusively agriculture but the report finds that advanced anaerobic digestion is the most economically and environmentally sustainable option for this stream. While this plan was subject to public consultation, there was no formal engagement with the RWMPO and there is no recorded formal engagement since publication. There remains an urgent need for detailed engagement between Irish Water and the RWMPO on the waste management options and capacity for this waste stream in the event that the existing agriculture outlet is disrupted. In addition, the Irish Water network provides treatment capacity for septic tank cleaning services and there appears to be limited engagement between Irish Water and the RWMPO to identify any capacity issues for this treatment. There is the possibility of synergy between composting or biogas capacity for municipal waste and sewage sludges. This policy remains relevant with greater action and emphasis on engagement to ensure that all parties are consistent and agreed on treatment options and infrastructure in the revised or replacement Plan.
H.2 Investigate the opportunity to establish and expand management schemes for particular waste streams including (but not limited to) paints, medicines, mattresses, other bulky wastes, agricultural and horticultural chemicals and waste oils (where technically, environmentally, and economically practicable).	Throughout the plan period, the RWMPO have considered the management opportunities for a number of the listed waste streams both a solo project and through collaboration/reliance on other party projects. These streams include paints, hazardous farm waste, medicines and waste oils and while the actioned studies have not always been delivered, the data available has illustrated a number of recommendations for future management under the revised or replacement Plan such as through existing producer responsibility schemes (see below) or wider collection networks (such as farm hazardous waste – policy E7). Once these schemes are established and implemented under the revised or replacement Plan, a corresponding focus on transfer knowledge to local authorities and wider public awareness need to be retained within the policy.
H.3 Co-operate and input into the setting up of new national producer responsibility schemes (statutory or voluntary) for waste streams to ensure the role of local authorities is clear and can be practically achieved.	The RWMPO have had ongoing input and collaboration on the development and implementation of existing producer responsibility schemes to date. In addition, the RWMPO have had ongoing consideration of potential for waste streams that may be suited to the pending extended producer responsibility changes both under the Waste Action Plan for a Circular Economy 2020-2025 and Regulation 30/30A of the European Union (Waste Directive) Regulations 2011-2020. The RWMPO have a very clear vision for the waste streams that may be suited to EPR as listed in the Waste Action Plan for a Circular Economy 2020-2025. The improved governance and transparency within these schemes will allow the RWMPO to promote incentives and encourage sharing of information and good practices in waste recycling and drive better product design. This policy remains relevant and should be aligned with the evolving EPR policy and legislation.

### 3.8.3 Strategic Objective H

The RWMPO have been somewhat successful in working with other groups to identify other waste streams outside of the performance targets that will require future attention under the revised or replacement Plan. The RWMPO have provided detailed consultation feedback to DECC on the draft Waste Action plan during consultation on the need for changes in policy for a range of other waste streams covered within the plan including construction waste, textiles, single use plastics, etc. These streams have been identified and are now included in the Waste Action Plan for a Circular Economy 2020-2025 for consideration as extended producer responsibility or other management schemes. To this end, the RWMPO have been proactive and successful in shaping policy to tackle the waste streams of relevance and those evolving priorities under EU legislation and policy.

The revised or replacement Plan is to consider the following in shaping future policies and actions resulting from the evaluation:

- The wording of the strategic objective remains relevant for the revised or replacement Plan;
- A more meaningful engagement with Irish Water on sludge waste treatment and end use is required to ensure that capacities, risks and opportunities of these streams are suitably transparent and managed;
- The Waste Action Plan for a Circular Economy 2020-2025 has signalled the potential consideration of additional waste streams within future Extended Producer Responsibility schemes and these schemes will be required to comply with the new requirements of Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020. The establishment of any new EPR schemes needs to be fully collaborative and transparent and future policies and objectives in the revised or replacement Plan are to reflect the need for RWMPO input to such schemes; and
- Continue to investigate the viability of running pilot schemes for the management of emerging waste streams to capture data to inform suitable management models.

## 3.9 Strategic Targets

### 3.9.1 Strategic Target 1

**1% reduction per annum in the quantity of household waste generated per capita over the period of the Plan.**

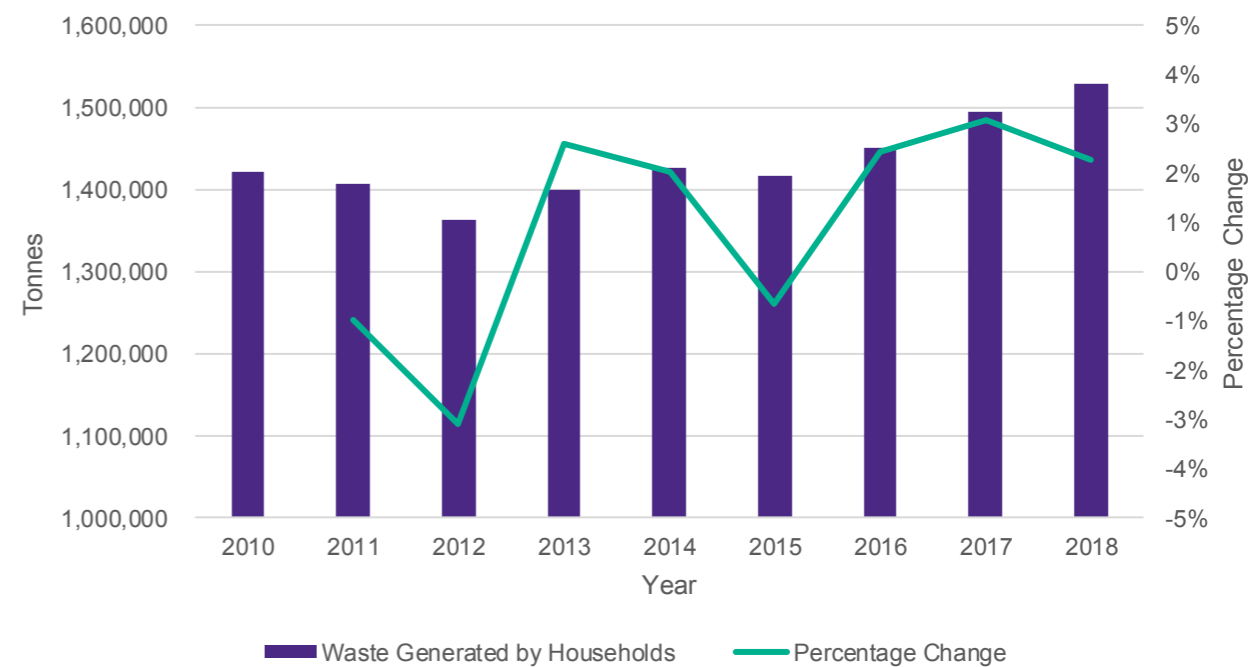
The waste statistics are provided by the EPA Waste Statistics for Households<sup>4</sup> and **Table 3.16** provides the total tonnes of Irish household waste collected between 2010 and 2018 and the percentage change (increase or decrease) from the previous year. The EPA are yet to publish the 2019 and 2020 quantities of Irish household waste. The total tonnes and yearly percentage change is displayed in **Figure 3.2**.

<sup>4</sup> <https://www.epa.ie/nationalwastestatistics/household/> - accessed May 2021.

**Table 3.16: Municipal Waste Generated in Ireland**

Municipal Waste Generated by Origin	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Waste Generated by Households (Tonnes)	1,420,706	1,406,576	1,362,900	1,398,156	1,426,123	1,416,444	1,450,727	1,495,211	1,528,890	N/A	N/A
Reduction by 1% per Annum in HHW Generation	-	Yes	Yes	No	No	No	No	No	No	N/A	N/A
Percentage Change (%)	-	-0.99%	-3.11%	2.59%	2.00%	-0.68%	2.42%	3.07%	2.25%	N/A	N/A

Source: Environmental Protection Agency (EPA) Waste Statistics, Household - <https://www.epa.ie/nationalwastestatistics/household/> - Accessed May 2021



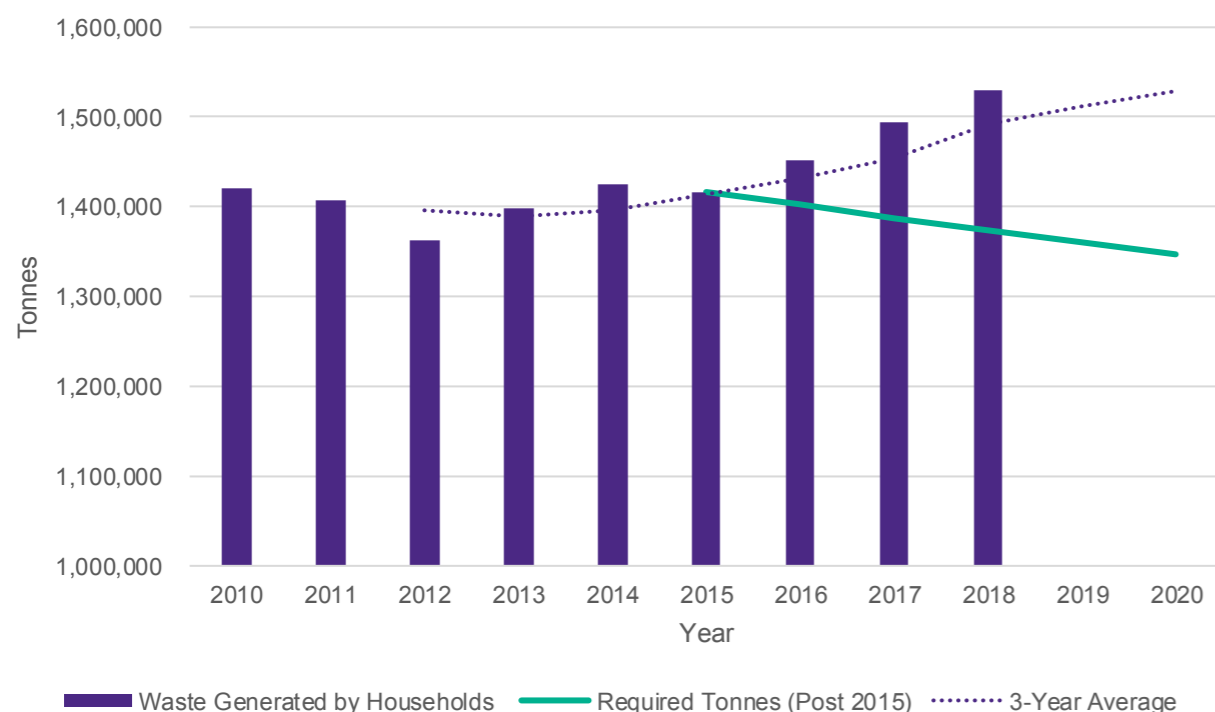
Source: Environmental Protection Agency (EPA) Waste Statistics, Household - <https://www.epa.ie/nationalwastestatistics/household/> - Accessed May 2021

**Figure 3.2: Municipal Waste Generated by Households in Ireland**



**Figure 3.2** shows that the total waste generated by Irish households has ranged between 1,362,900 tonnes and 1,528,890 tonnes between 2010 and 2018. The total tonnes decreased between 2010 and 2012, since 2012 the total tonnage has increased with the exception of a slight decrease in 2015. The highest quantity of waste was recorded in 2018, indicating that the quantity of household waste is currently increasing. The annual percentage change of the total quantity of household waste varies between -3.11% (2011-2012) and +3.07% (2016-2017).

The current regional Waste Management Plan Period (2015-2021) set a 1% reduction target per annum in the quantity of household waste. **Figure 3.3** displays the waste generated by Irish households and the predicted 2019 and 2020 quantities using a 3-year moving average between 2010 and 2018. The graph shows that for Ireland to meet the requirements of a 1% reduction per annum (between 2015 and 2020) Ireland would have to generate less than 1,360,630 tonnes in 2019 and less than 1,347,024 tonnes in 2020. The 3-year moving average of total waste anticipates that the total tonnes of waste will be approximately 1,510,000 in 2019 and 1,530,000 in 2020, values that are significantly above the 1% reduction required values.



Source: Environmental Protection Agency (EPA) Waste Statistics, Household - <https://www.epa.ie/nationalwastestatistics/household/> - Accessed May 2021

**Figure 3.3: Waste Generated by Households and the 1% Reduction Requirement**

Analysing EPA household waste statistics it can be concluded that Irish households have not met the required 1% reduction between 2016 and 2018 and is not anticipated reduction targets in 2019 and 2020 will be met given the 3-year trend.

The EPA statistics for 2018 show that the majority of waste collected from Irish households (per capita) is from mixed residual collection (black bin) followed by mixed dry recyclables (green bin) and organic collection (brown bin). Therefore, reduction of waste should focus on the black bin waste generated across Ireland. The increased black bin waste could be the result of improperly segregated household waste resulting in the cross-contamination of recyclables and inefficient waste management.

An EPA study found that the rising trend in household waste correlates with Central Statistics Office data on personal consumption of goods and services, both of which have shown an upward trend since 2012. The data indicate that household waste generation in Ireland continues to be closely linked with lifestyle and consumption patterns.

It is recognised that greater supports for householders are required to manage wastes at home, avail of waste civic amenity and bring centres and expand recycling infrastructure to facilitate the shift to greater recycling rates.

In summary, this Strategic Target is a measure of public awareness and real behaviour change among households. When this target was set in 2015 it was ambitious and the data shows that the State has not, and

will not, meet this target over the plan period. There remains a pressing need to decouple economic activity from waste generation in households. The realisation of this goal will take consistent investment for awareness strategies to effect real behaviour change. It is recommended that a future target on prevention recognises the limited control of the RWMPO in achieving this target. Any future target needs to be designed so it is readily (and reliably) measurable and will require the collective buy-in and sustained efforts of many stakeholders, public and private.

### 3.9.2 Strategic Target 2

#### Achieve a recycling rate of 50% of managed municipal waste by 2020.

**Table 3.17** provides the percentage of recycling of municipal waste generated between 2012 and 2018. The waste statistics are provided by the EPA Waste Statistics for Municipal Waste<sup>5</sup> (the Agency are yet to publish the 2019 and 2020 quantities of Irish municipal waste). These percentages are calculated using the EPA's preferred calculation approach based on the OECD-Eurostat sustainable development indicator on municipal waste.

**Table 3.17: Percentage of Municipal Waste Recycled (2012-2020)**

Municipal Waste	2012	2013	2014	2015	2016	2017	2018	2019	2020
Recycling of Municipal Waste Generated (%)	37	No Data	40	No Data	41	40	38	No Data	No Data

Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021

**Figure 3.4** displays the data provided by the EPA municipal waste statistics and shows that the percentage of recycling of municipal waste generated in Ireland ranges between 37% and 41%. The graph shows that the percentage of recycling of municipal waste generated increased between 2012 and 2015 and has decreased between 2016 and 2018.

The Waste Framework Directive includes EU targets for the management of municipal waste. The targets are displayed in **Table 3.18** and state that 50% of municipal waste is prepared for re-use/recycled by 2020, this rises to 55% to be achieved by 2025, 60% to be achieved by 2030 and 65% to be achieved by 2035<sup>6</sup>.

**Table 3.18: Waste Framework Directive EU Targets 2020-2035**

Year	EU Target (%)
2020	50
2025	55
2030	60
2035	65

Source: European Commission (2008). Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

<sup>5</sup> <https://www.epa.ie/nationalwastestatistics/municipal/> - accessed May 2021.

<sup>6</sup> European Commission (2008). Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

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Year	Percentage
2012	37%
2013	-
2014	40%
2015	-
2016	41%
2017	40%
2018	38%

Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021**Figure 3.4: The Percentage of Municipal Waste Recycled (2012-2018)**

Given the current trend of the recycling of municipal waste generated in Ireland, it is unlikely that the 50% EU target will be achieved in 2020. This puts Ireland's achievement of future EU targets for 2025, 2030 and 2035 at risk without significant intervention and progress.

A separate calculation method has been used for reporting on the compliance with the Waste Framework Directive's 2020 recycling target for municipal waste (based on household derived paper, metal, plastic and glass), as provided for under the Directive. This method calculates Ireland's municipal recycling rate to be 51% in 2018, in compliance with the Directive's 2020 target of 50%. However, future Waste Framework Directive targets for 2025 onwards will use a calculation methodology more comparable with the OECD-Eurostat Indicator. **Figure 3.5** shows that it is unlikely that Ireland will achieve the 2025 and thereafter EU targets using the OECD-Eurostat Indicator.

Year	Recycling percentages (%)	Future EU targets (%)
2012	37%	-
2013	38%	-
2014	40%	-
2015	40%	-
2016	41%	-
2017	40%	-
2018	38%	-
2020	-	50%
2025	-	55%
2030	-	60%
2035	-	65%

Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021**Figure 3.5: Recycling of Municipal Waste Generated and Future EU Targets**

In summary, Ireland's recycling percentage has not improved significantly between 2012 and 2018 and for Ireland the recommendations are to prevent waste (buy less, instead swap, share and repair) and increase recycling through education and awareness of waste management. Current trends in Ireland show that energy recovery of municipal waste is increasing as it continues to replace landfill as the primary means of treating

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residual wastes. The current levels of residual waste need to reduce if recycling rates are to grow. Interventions required to support this change include prevention (through incentivised pricing), better kerbside segregation at households and business and the introduction of a recovery levy as proposed in the Waste Action Plan.

Strategic Target 2 is an EU mandated recycling rate target on recycling rates with a revised schedule of increasing targets over the medium term introduced by the revised Waste Framework Directive. These are principle mandatory targets and must be part of the revised or replacement Plan. The lack of meaningful progress in the recycling rate over the plan period and concerns over future targets needs to be a focus in the next plan.

**3.9.3 Strategic Target 3**

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

Unprocessed residual municipal waste means residual municipal waste collected at kerbside or deposited at landfill/CAS/transfer stations that has not undergone appropriate treatment through physical, biological, chemical or thermal processes including sorting.

Currently, there are no EPA statistics available for unprocessed residual municipal waste to landfill but the EPA does provide figures for municipal waste recycled, used as fuel and disposed to landfill (tonnes) between 2001 and 2018 and this information is presented in **Figure 3.6**.

Year	Municipal waste managed (t)	Recycling of municipal waste (t)	Energy recovery of municipal waste (t)	Landfill of municipal waste (t)
2001	2,400,000	300,000	100,000	2,000,000
2002	2,500,000	500,000	150,000	1,850,000
2003	2,600,000	700,000	200,000	1,700,000
2004	2,700,000	900,000	250,000	1,550,000
2005	2,800,000	1,100,000	300,000	1,400,000
2006	3,200,000	1,300,000	350,000	1,550,000
2007	3,300,000	1,400,000	400,000	1,500,000
2008	3,100,000	1,200,000	450,000	1,450,000
2009	2,800,000	1,000,000	500,000	1,300,000
2010	2,600,000	1,000,000	550,000	1,050,000
2011	2,500,000	1,000,000	600,000	900,000
2012	2,400,000	1,000,000	650,000	750,000
2013	2,500,000	1,000,000	700,000	700,000
2014	2,600,000	1,000,000	750,000	650,000
2015	2,700,000	1,000,000	800,000	600,000
2016	2,700,000	1,000,000	850,000	550,000
2017	2,700,000	1,000,000	900,000	500,000
2018	2,800,000	1,000,000	950,000	450,000

Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021**Figure 3.6: Municipal Waste Recycled, Used as Fuel and Disposed to Landfill (2001 - 2018)**

The figure shows that the generation of municipal waste increased between 2001 and 2007 prior to a period where municipal waste generation decreased between 2007 and 2012. Since 2012, total municipal waste managed has continued to increase until the most recent figures in 2018. From the available EPA published data the current trend shows that municipal waste being sent to landfill is generally decreasing with 418,029 tonnes of municipal waste sent to landfill in 2018 (circa 15% of waste generated).



The RWMPO has previously undertaken a National Review of Civic Amenity Sites (CAS). The review included an assessment of handling of unprocessed residual waste at CAS. Unprocessed residual waste was reported as going directly from the CAS to landfill at two CAS. Unprocessed residual waste is reported as going directly from site to incineration at five CAS. The review can therefore conclude that the target of 0% of unprocessed residual municipal waste being sent to landfill is not currently being achieved.

As noted earlier in this report, it is recommended that the EPA impose a licence condition on all landfills licensed to accept municipal waste that prohibits the acceptance of unprocessed waste at these facilities. An extension approach to include waste to energy facilities to improve the management of residual wastes should be considered.

In summary, Strategic Target 3 cannot be accurately evaluated as there is limited data available to robustly quantify the volume of unprocessed waste to landfill. The quantity of unprocessed waste being sent to landfills is considered to be small, set against a decreasing rate of residual waste disposal. There is a need for better collation of this data to verify this trend. It is recommended that the EPA impose a licence condition on all landfills licensed to accept municipal waste that prohibits the acceptance of unprocessed waste at these facilities. Such an intervention will eliminate disposal of this stream. There appears to be limited value including this type of target in the next plan with alternative targets to improve the management of other waste streams (textiles, construction and demolition wastes, food waste, plastics etc) more pressing.

## 4 CONCLUSIONS

Notwithstanding the recommendations stated for each of the objectives and targets presented in **Section 3** of this report, there are a number of broader key themes identified in the evaluation for consideration for future waste management planning. These key themes may be summarised as follows:

- The need for a revised or replacement Plan;
- The structure of the revised or replacement Plan;
- The need for a dynamic Plan that has capacity to prioritise through the timeframe of the Plan; and
- The need for shared ownership.

Each of the above is set out in the following sections for consideration.

### 4.1 Revise or Replace

The decision to revise or replace the current waste plans takes on board the findings of this evaluation, evolving policy and the latest legislative requirements. During the plan period significant changes to waste policy and legislation have occurred at a national and international level. At European level the Green Deal was introduced in 2019 setting headline goals for Member States to achieve carbon neutrality by 2050 and to halt biodiversity loss. The waste sector has a role to play in achieving these objectives. A 2<sup>nd</sup> Circular Economy Action Plan was introduced in 2020 which builds on previous policy with a focus on improving the management of specific streams (including targets) for textiles, food waste, construction and demolition wastes and plastics.

A revised Waste Framework Directive (2018/851) introduced in 2018 has strengthened and improved the parent framework for managing wastes. Ireland has responded transposing Directive (EU) into Irish legislation through the European Union (Waste Directive) Regulations 2020 (S.I. No. 323 of 2020). This new legislation includes significant changes such as

- Enhanced requirements and mechanisms for the prevention of waste;
- New targets for municipal and construction and demolition wastes; and
- A redefined set of requirements for Waste Management Plans under Section 22 of the Act, as amended (these requirements are included in **Appendix A** and the replacement plan must be developed in accordance with these).

The policy and legislative environment has changed significantly over the lifetime of the current plans. To realise the new targets and requirements, it is recommended that the RWMPs are replaced with a single national waste management plan. The single plan will aim to build on the progress from 2015, strengthen national capacity and delivery while retaining a regional focus for implementation. This approach aligns with Ireland's policy statement, the Waste Action Plan for a Circular Economy, which includes a recommendation for the revision of the existing three regional plans into a national plan approach.

### 4.2 Structure of the Plan

While the defined requirements of the new plan (as presented in **Appendix A**) are prescriptive, the replacement plan structure needs to provide an adaptable clear framework for delivery. At the Irish Waste Management Association Annual Conference in November 2019 the RWMPO gave a presentation which looked at setting out an alternative thematic approach to the plan promoting the following themes:

- Consumption of materials and generation of waste;
- Compliance with relevant waste management laws and policies;
- Capture of waste materials for treatment; and
- Circularity to tie each of the above together.

Such a thematic approach would be a departure from the current target and objective-led structure in the existing RWMPs, however, this approach will help to set more meaningful and thematic led targets to drive the improvements needed.

In short, there will need to be flexibility in the structure of the replacement plan to allow for a more progressive approach to be implemented while recognising that legislative requirements need to be addressed in the content.

Also in relation to structure, the current plans set out a layered structure consisting of objectives, policies, policy actions and targets as follows:

- 3 headline strategic targets covering prevention, recycling and landfilling and these are common to the three plans;
- 8 strategic objectives which set out the region's statement of intent for each of the plans which are also common to the three plans;
- 43 policies to achieve the overarching strategy and targets of the plans which are common across the three plans; and
- 63 policy actions implementing policies listed with only minor differences between the three plans.

This evaluation report illustrates that while this multi-layered approach provides advantages in terms of management and planning, the policy action structure was too rigid and inflexible. Consideration should be given in the replacement plan to a similar plan implementation structure with fewer policy tiers. For example, an alternative structure may include higher level themed targets supported by a specific objectives. The delivery of these objectives may fall to annual implementation plans to maintain a dynamic responsive nature to the replacement plan (refer **Section 4.3**).

### 4.3 A Dynamic Plan

Over the lifetime of the current plans there have been a number of policy and legislative changes that have shifted the waste policy and legislative requirements. Key changes include:

- The Circular Economy Action Plan (COM (2015) 614) which has been updated in March 2020 (COM (2020) 98) as part of the European Green Deal;
- 'A Waste Action Plan for A Circular Economy – Ireland's National Waste Policy 2020 – 2025';
- 'All of Government Circular Economy Strategy' to be published in 2021;
- The general shift away from disposal to recovery within the market; and
- The enhanced roles of the WERLAs and NWCPO under the Waste Action Plan.

When coupled with other significant external challenges such as the 2016 municipal residual waste capacity deficit or the 2020/2021 COVID-19 response, the waste sector may be viewed as a constantly changing and fluid system with evolving and dynamic priorities.

In this regard, it is important the replacement plan is sufficiently flexible to allow for a dynamic response to evolving issues over the lifetime of the plan. These evolving issues may include thematic or sectoral prioritisation, market drivers for collection, treatment capacity and/or emergency responses to unforeseen events.

The current model of setting priority actions that apply for the six year plan period proved to be effective for progressing many policies, but was also overly rigid. It is proposed to replace this structure with annual or biennial quantifiable actions developed as part of annual implementation plans. Such an approach in the replacement plan will lead to a more dynamic implementation model allowing the RWMPO to respond to issues as these arise over the plan period.

### 4.4 A Shared Ownership Model

This evaluation has illustrated two largely conflicting outcomes which are considered further below:

- The RWMPO have achieved a high level of success in implementing the various policies and policy actions prescribed within the three existing plans. While not all actions were achieved there is generally a high level of delivery. This includes establishing and building strong stakeholder collaboration within the industry, coordinating and tracking waste data and capacities.

- Conversely, this high level of RWMPO performance has not translated into target success and the attainment of the three strategic targets has been poor over the plan period. As noted, these targets were highly ambitious when set in 2015 but the absence of any meaningful progress on the targets over the plan period is a concern.

This contradiction does illustrate one of the key issues for consideration in the replacement plan, i.e. the need for a shared ownership of the plan and targets. While the RWMPO are tasked with providing the structure and framework for delivery of the targets, the local authority network is not solely responsible for the achievement of these targets. Furthermore, the RWMPO does not have the authority to control all operations in the waste sector to drive the changes to achieve these targets.

The changes required can only be achieved through a wider shared collaboration and ownership of the replacement plan and associated targets and policies. This collaboration requires active participation from all stakeholders in a highly functioning waste collection, processing, recovery and disposal market.

The RWMPO will continue as the coordinating force under the replacement plan but with a shared vision for the sector where all of the key actors have ownership of the plan.



## Appendix A

### Revised Content for Waste Management Plans

#### Amendments to Section 22 of the Act of 1996 (Waste Management Plans) as prescribed in the European Communities (Waste Directive) Regulations 2020 (S.I. No. 323 of 2020)

9. (1) Subsection (6)(b) is replaced as follows:

*'(b) A waste management plan shall contain, as appropriate, and taking into account the geographical level and coverage of the planning area, at least the following:*

- (i) (I) the type, quantity and source of waste generated within the territory, the waste likely to be shipped from or to the national territory, and an evaluation of the development of waste streams in the future; and*
- (II) a requirement that, in order to fulfil this obligation, liaison shall be undertaken, as appropriate, with the Minister, the Agency, Dublin City Council and other relevant local authorities;*

*(ii) existing major disposal and recovery installations, including any special arrangements for waste oils, hazardous waste, waste containing significant amounts of critical raw materials, or waste streams addressed by specific Union legislation;*

*(iii) an assessment of the need for closure of existing waste installations, and for additional waste installation infrastructure in accordance with section 37A. The Minister shall ensure that an assessment of the investments and other financial means, including for local authorities, required to meet those needs is carried out. This assessment shall be included in the relevant waste management plans or in other strategic documents covering the entire territory of the State;*

*(iv) information on the measures to attain the objective laid down in Article 5(3a) of Directive 1999/31/EC or in other strategic documents covering the entire territory of the Member State concerned;*

*(v) an assessment of existing waste collection schemes, including the material and territorial coverage of separate collection and measures to improve its operation, of any derogations granted in accordance with Article 10(3) of the Waste Directive, and of the need for new collection schemes;*

*(vi) sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations, if necessary;*

*(vii) general waste management policies, including planned waste management technologies and methods, or policies for waste posing specific management problems;*

*(viii) measures to combat and prevent all forms of littering and to clean up all types of litter;*

*(ix) appropriate qualitative or quantitative indicators and targets, including on the quantity of generated waste and its treatment and on municipal waste that is disposed of or subject to energy recovery.*

*(x) information as respects the integration and implementation of measures consequential on, or incidental to, the requirements of section 27A in relation to waste prevention programmes;*

*(xi) the measures taken by the Minister to give effect to Article 22 of the Waste Directive in relation to biowaste.'*

(2) Subsection (6)(d) is replaced as follows:

*'(d) Waste management plans shall conform to the waste planning requirements laid down in Article 14 of European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste, and the strategy for the implementation of the reduction of biodegradable waste going to landfills, referred to in Article 5 of Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste as well as national legislation and policy on biodegradable waste.'*

## Appendix B Legislative Review

### B.1 EU Legislation

There have been a number of additional legislative changes in the waste sector driven by EU policy since publication of the plans in 2015 and some of the headline changes in waste legislation are listed as follows:

- Directive (EU) 2018/849 of 30 May 2018 amending Directives 2000/53/EC on end-of-life vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on waste electrical and electronic equipment;
- Directive (EU) 2018/850 of the European Parliament and of the Council of 30 May 2018 amending Directive 1999/31/EC on the landfill of waste;
- Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018 amending Directive 94/62/EC on packaging and packaging waste; and
- Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

### B.2 National Legislation

Similarly, there have been a number of changes to national legislation with potential to refocus the plans and policy actions including:

- The Waste Management (Collection Permit) (Amendment) Regulations 2016 (S.I. No. 24 of 2016);
- European Union (Waste Directive) (Amendment) Regulations 2016 (S.I. No. 315/2016);
- Waste Management (Collection Permit) (Amendment)(No.2) Regulations 2016 (S.I. No. 346/2016);
- European Union (Waste Directive) (Recovery Operations) Regulations 2016 (S.I. No. 372/2016);
- Waste Management (Fixed Payment Notice) (Producer Responsibility) Regulations 2016 (S.I. No. 373/2016).
- European Communities (Port Reception Facilities for Ship Generated Waste and Cargo Residues) (Amendment) Regulations 2016 (S.I. No. 550/2016).
- The European Union (End of Life Vehicles) (Amendment) Regulations 2016 (S.I. No. 566 of 2016);
- The Waste Management (Farm Plastics) (Amendment) Regulations 2017 (S.I. No. 396 of 2017);
- The Waste Management (Tyres and Waste Tyres) Regulations 2017 (S.I. No. 400 of 2017);
- Waste Management (Tyres and Waste Tyres) (Amendment) Regulations 2017 (S.I. No. 598/2017);
- Waste Management (Prohibition of Waste Disposal by Burning) (Amendment) Regulations 2017 (S.I. No. 599/2017);
- Waste Management (Tyres and Waste Tyres) (Amendment) Regulations 2018 (S.I. No. 96/2018);
- European Union (Properties of Waste which Render it Hazardous) Regulations 2018 (S.I. No. 383/2018);
- European Union (Ship Recycling) (Waste) Regulations 2019 (S.I. No. 13/2019);
- Waste Management (Landfill Levy) (Amendment) Regulations 2019 (S.I. No. 182/2019);
- European Union (Waste Electrical and Electronic Equipment) (Amendment) Regulations 2019 (S.I. No. 233/2019);
- Waste Management (Facility Permit And Registration) (Amendment) Regulations 2019, (S.I. No. 250/2019);
- European Union (Waste Licensing) (Amendment) Regulations 2019 (S.I. No. 618/2019);
- Waste Management (Prohibition of Waste Disposal by Burning) (Amendment) Regulations 2019 (S.I. No. 684/2019);
- European Union (Waste Management (Environmental Impact Assessment) Regulations 2020 (S.I. 130 of 2020).



### B.3 BAT Conclusions

Under the exchange of information carried out in the framework of Article 13(1) of the Industrial Emissions Directive (IED, 2010/75/EU) the EU has published two relevant BAT Conclusion documents that are now mandatory for implementation for IE licenced was facilities as follows:

- Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council.
- Commission Implementing Decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration.



## APPENDIX 4

Pre-Draft  
Submissions Report



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# 1.0 INTRODUCTION & CONSULTATION PROCESS

## 1.1 Introduction

This Pre-draft Consultation report has been prepared on behalf of the three Regional Waste Management Planning Offices, Connacht-Ulster Region, Eastern-Midlands Region and Southern Region.

The lead Local Authorities in the three Waste Management Planning Regions are as follows:

- Connacht-Ulster Region: Mayo County Council
- Eastern-Midlands Region: Dublin City Council.
- Southern Region: Limerick City & County Council joint with Tipperary County Council

The purpose of this report is to review the submissions and consider the issues raised, respond to the issues and consider their inclusion in the National Waste Management Plan for a Circular Economy.

## 1.2 Background

Waste management planning is the responsibility of the local authorities under Part II of the Waste Management Act 1996 and in June 2013, the three waste management regions of Connacht -Ulster, Southern, and Eastern-Midlands were established. In May 2015, each of the three regions published a Regional Waste Management Plan (RWMP) to cover the period 2015 to 2021.

A series of objectives, policies and actions in the RWMP set the framework for the prevention and management of wastes in a safe and sustainable manner in each region. These are administered by three Regional Waste Management Planning Offices (RWMPO).

## 1.3 Ireland's next Waste Plan

Ireland's National Waste Policy 2020 – 2025 'A Waste Action Plan for a Circular Economy' calls for the replacement of the existing Regional Waste Management Plans with a single National Waste Management Plan for a Circular Economy, containing targets for reuse, repair, resource consumption and a reduction in contamination.

The single plan will aim to build on the progress from 2015, strengthen national capacity and delivery while retaining a regional focus for implementation.

While the defined legislative requirements for waste management plan content are prescriptive under Section 22 of the Waste Management Act, the replacement plan structure needs to provide an adaptable clear framework for delivery. The RWMPO has previously proposed setting out an alternative thematic approach to the plan promoting themes as described below.

Such a thematic approach will be a departure from the current target and objective-led structure in the existing RWMPs, however, this approach will help to set more meaningful and thematic led targets to drive the improvements needed. This thematic approach is recommended for the replacement plan while ensuring all of the legislative requirements are suitably addressed.

### 1.3.1 Key Themes

For the new single National Waste Management Plan for a Circular Economy, current suggested key themes are outlined below but may be subject to change as the plan consultation phase develops.

#### Circularity

Circularity is the thread that ties the themes of consumption, compliance and capture together in the context of the National Waste Management Plan for a Circular Economy.

#### Consumption

*“the action of using up a resource”*

Consumption is at the heart of all waste generation. In simple terms the more we consume the more waste we potentially produce. The National Waste Management Plan must focus on consumption in all its forms through existing and new initiatives.

#### Compliance

*“the act of obeying an order rule or request”*

Compliance is at the heart of all waste management practices. In simple terms if we comply with the rules and guidance for waste management, we will achieve our ambitions. The National Waste Management Plan must focus on enabling compliance in all its forms from participation in authorised services to the promotion of personal responsibility for waste produced.

#### Capture

*“the process of collecting a natural product so that it can be used”*

The process of capturing or harnessing waste materials so that they may be processed, recycled, reused, recovered or disposed of in a sustainable way is at the heart of protecting the environment. The National Waste Management Plan must focus on the capture of materials from kerbside collection to civic amenity sites to promote sustainable circularity.



## 1.4 Consultation Process

The process of the preparation of the new National Waste Management Plan for a Circular Economy (NWMPCE) commenced with the publication of a notice of intention to commence preparation of the new NWMPCE, in accordance with Section 22 of the Waste Management Act, 1996 and the Waste Management (Planning) Regulations, 1997, on the 11th March 2021 in the following national papers – Irish Examiner, Irish Independent, The Irish Sun, The Daily Mail and The Irish Times (refer to Appendix A for copy of notice).

For the purpose of Section 23(1) of the Waste Management Act, 1996 a copy of the notice was forwarded to the following parties:

- All Local Authorities in Ireland
- Dept. Of Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Department of Agriculture, Food and Marine
- An Taisce
- Fáilte Ireland
- Teagasc
- Department of the Environment, Climate and Communications
- Department of Housing, Local Government and Heritage
- National Waste Collection Permit Office (NWCPO)
- National Transfrontier Shipment Office (NTFSO)
- Environmental Protection Agency (EPA)
- Waste Enforcement Regional Lead Authority Southern Region (WERLA SR)
- WERLA Connacht – Ulster Region (WERLA CUR)
- WERLA Eastern –Midlands Region (WERLA EMR)
- CRÉ
- District and Borough Councils in Northern Ireland

Notifications were also circulated to other relevant stakeholders.

In addition, the public notice was posted on [www.mywaste.ie](http://www.mywaste.ie) and associated social media. The public were invited to make their submissions through an online questionnaire on [www.mywaste.ie](http://www.mywaste.ie) as an alternative to submitting their proposals in writing or by email to the Southern Region Waste Management Planning Office (SRWMPO). The SRWMPO received the submissions on behalf of the RWMPO. Members of the public and all stakeholders had until the 6th May 2021 to make a submission, in relation to the preparation of the plan. This report summarises the submissions received by the Regional Waste Management Planning Offices.

## 2.0 WRITTEN SUBMISSIONS

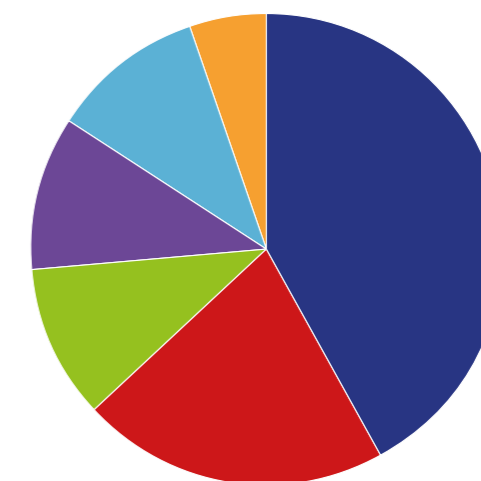
### 2.1 Submissions Received & Summary of Issues Raised

A total of 19 written submissions were received at the SRWMPO either through standard mail or email. In addition to these, submissions were also received through the online questionnaire on [www.mywaste.ie](http://www.mywaste.ie). An analysis of these questionnaires is provided separately in Section 3.

An overview of the source and number of written submissions is presented in Table 2.1 and Figure 1.

**Table 2.1** Written submissions for pre-draft consultation for NWMPCE

Type	No. of Submissions	% Submissions
Representative Org	8	42.1%
Waste Operator	4	21.1%
State Organisation	2	10.5%
Action Groups	2	10.5%
Individuals	2	10.5%
Business	1	5.3%
<b>Total</b>	<b>19</b>	<b>100.00%</b>



**Figure 2.1:** Sources of written submissions for pre-draft consultation for NWMPCE

### 2.2 Issues Raised in Written Submissions

The following presents a summary of the issues raised in the 19 written submissions, which were mainly from waste industry, business and community organisations. The issues are grouped according to the themes, with some appropriate subheadings, that have been identified as key under the new thematic approach for the preparation of the National Waste Management Plan for a Circular Economy. The themes identified are as follows:

- Circularity:** binding the following other themes together
- Consumption** of materials and generation of waste;
- Compliance** with relevant waste management laws and policies; and
- Capture** of waste materials for treatment.

## 2.3 CIRCULARITY

Table 2.2 Circularity

Subcategory	Summary of submissions received
Circularity in General	<p>All submissions highlighted how waste prevention and management activities should link with the Circular Economy. All activities should be structured and implemented so that circularity is at an optimum and disposal at a minimum.</p> <p>The following are just some of the particular points made:</p> <ul style="list-style-type: none"> <li>• The National Waste Management Plan for a Circular Economy is being prepared at a pivotal time for waste management, with the recent publication of the Waste Action Plan for a Circular Economy policy; the drafting of a national Circular Economy Strategy and EPA's Circular Economy Programme; and the transposition of circular economy legislation into national law.</li> <li>• Ireland now has the opportunity to introduce systemic change in waste management through policy and planning to drive circular economy and climate action in Ireland.</li> <li>• This new ambition, which puts prevention (including avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of resource efficiency planning.</li> <li>• The opportunity for all island approaches to targets for both reuse and circular material usage rates and/or circularity gap closure should be explored.</li> <li>• The forthcoming plan needs to take into account the fast-changing world of the circular economy and allow for flexibility to adapt to changing technologies and practices.</li> <li>• Products sold to consumers must be "Designed and Made for the Circular Economy" and not made for disposal</li> <li>• The overriding priority is in the area of producer responsibility and to bring the Polluter Pays Principle back to the manufacturers and retailers.</li> <li>• Better engagement is needed with the main stakeholders, including especially the waste industry.</li> <li>• For the Circular Economy, it is vital to follow the 8 Rs: Refuse, Reduce, Reuse, Repair, Reclaim, Recirculate, Recycle, Re-earth/Rot.</li> <li>• It is critically important that recycling is made easy for the consumer, is supported through sorting / processing and is financially attractive for business.</li> <li>• Instead of planning for expansion of end of pipe solutions, such as waste to energy plants or cement kilns, Ireland must invest in more materials-based, regenerative approaches that write 'waste' out of the vernacular.</li> </ul>

### Response and Recommendations of RWMPO:

- It is recommended that the NWPCE focus strongly on implementation of the circular economy approach which is the cornerstone of current and future EU and national waste policy, legislation, guidance and codes of practice.
- It is envisaged that this transition to a circular economy will help to deliver, increased national self-sufficiency including for waste management. It is recommended that waste management self-sufficiency, in the Irish context, be given increased focus during the next Plan period.

## 2.4 CONSUMPTION of materials and generation of waste

### 2.4.1 Prevention

Table 2.3 Prevention

Subcategory	Summary of submissions received
Packaging	<ul style="list-style-type: none"> <li>• Several submissions referred to reduction of packaging waste</li> <li>• Guidance on implementation of Single Use Plastics (SUPs) reduction measures will be needed.</li> <li>• Some caution was expressed that 'packaging free' and other packaging restrictions could lead to spoilage of certain products e.g. food.</li> <li>• Business needs support in their ongoing work to reduce packaging</li> <li>• More onus is needed on producers to minimise waste packaging</li> <li>• Address the fact that Ireland has the highest plastic waste per capita</li> <li>• Zero Waste Options should be considered in retail</li> <li>• Ecommerce should be assessed for overpackaging</li> </ul>
Education & Awareness	<ul style="list-style-type: none"> <li>• There were several submissions stressing the need for ongoing development of education and awareness programmes including mywaste.ie.</li> <li>• Pilot studies are important</li> <li>• Engagement with relevant stakeholders will be important, including citizen awareness programme and community initiatives e.g. Zero Waste</li> <li>• Education is needed on packaging labels and effective waste segregation</li> </ul>
Reuse	<ul style="list-style-type: none"> <li>• A number of submissions proposed specific targets to encourage reuse.</li> <li>• Initiatives such as Reuse Month and ReMark were encouraged.</li> <li>• There is a need for better access to expertise and skills for repair and reuse.</li> </ul>
Food Waste	<ul style="list-style-type: none"> <li>• Submissions on food waste included the significance of the target of 50% reduction in food waste by 2030 as per Government Waste and Climate Action Plans and the Sustainable Development Goals.</li> <li>• Consultation with stakeholders is essential, using a Farm to Fork approach. Different food waste prevention campaigns should be aligned for greatest effect.</li> <li>• Brown bin roll-out in a practical manner is largely welcomed.</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Specific measures such as placing of microfiber filters in washing machines</li> </ul>

**Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, Strategic Objective B of the current Plan will remain relevant for the NWPCE.

Strategic Objective B states the following:-  
*Prioritise waste prevention through behavioural change activities to decouple economic growth and resource use.*

- The RWMPO will continue to engage closely with reuse initiatives such as CRNI.

- There is a clear need for effective messaging to exact more pronounced behaviour change.
- Prevention policy will be fully aligned with the policies presented in Ireland's Waste Action Plan for a Circular Economy as well as the National Circular Economy Programme prepared by EPA.
- Adoption of the food waste hierarchy as a priority order in food waste prevention and management. The new NWMPCE will also consider the role of the food waste hierarchy in designing and implementing policy measures *to halve food waste generation by 2030.*

**2.4.2 Resource Efficiency**

Table 2.4 Resource Efficiency

Subcategory	Summary of submissions received
Resource Efficiency Targets	A submission promoted the introduction of resource efficiency targets and bringing Ireland's circular material use rate above the EU average by the end of this decade
Commercial Sector	A number of submissions made recommendations on how waste management in commercial premises could be improved on what has already been achieved. Recommendations included to have mandatory Pay by Weight 3-bin system, mandatory separation of waste materials for different premises, e.g. office paper in offices. There should also be a provision for penalties for commercial premises with high contamination in their bins.

**Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, Strategic Objective C of the current Plan will remain relevant for the NWPCE:

*The Region will encourage the transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources.*

- The policies under Objective C will be strengthened in the new Plan, in line with the policies outlined in the EU's second Circular Economy Action Plan (2020) and the Waste Action Plan for a Circular Economy (2020).
- The objective will be further strengthened through the introduction of additional legislative targets for the preparing for re-use and the recycling of waste materials introduced under the European Union (Waste Directive) Regulations 2011-2020.

- Engagement with industry and business support agencies will continue in order to drive resource efficiency and the promotion of reuse and repair, as well as the use of secondary materials.
- Repair and Reuse will be supported through implementation of the recommendations of the 2020 CAS review report.

- A new Commercial Waste Awareness Campaign has been developed in which a suite of materials are available to businesses to promote better waste management practices.
- Changes to commercial waste legislation are not within the remit of the NWMPCE.

**2.4.3 Climate**

Table 2.5 Climate

Subcategory	Summary of submissions received
Climate in general	<ul style="list-style-type: none"> <li>• A number of submissions outline the contribution that different activities of the waste hierarchy contribute to reducing greenhouse gas emissions, from prevention/reuse through to energy recovery processes.</li> <li>• Resilience and climate proofing of plan actions is essential and to ensure the plan is aligned to national climate ambitions and targets.</li> </ul>

**Response and Recommendations of RWMPO:**

The NWMPCE will recognise the importance of climate as a significant issue and will include a climate objective under the theme of Consumption. Targets may be considered as impact in terms of carbon equivalents rather than weight based target in some cases.



## 2.5 COMPLIANCE with relevant waste management laws and policies

### 2.5.1 Policy/Legislation

Table 2.6 Policy / Legislation Subcategories 1-3

Subcategory	Summary of submissions received
1. General	<ul style="list-style-type: none"> <li>Some submissions proposed the setting of specific targets to encourage movement up the waste hierarchy, for example targets on reuse and also targets for reducing household residual waste per person.</li> </ul>
2. All island approach for the island of Ireland	<ul style="list-style-type: none"> <li>Several submissions outlined the benefits to be gained in taking an all-island approach to waste management in the island of Ireland, such as economies of scale, thus reducing the need for export of waste materials with potential value.</li> <li>Regulatory norms will also be important regarding all-island approach.</li> </ul>
3. Food Waste / Brown bins roll-out to all households	<ul style="list-style-type: none"> <li>Initial brown bin pilot studies are recommended to determine whether there would be any unwanted repercussions, such as increased costs due to truck retrofitting, increased charges for the householder which could thus deter use of the service.</li> <li>Greater analysis of existing situation is needed where there is not full uptake of brown bins in areas where they are provided.</li> </ul>

#### **Response and Recommendations of RWMPO:**

In line with requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, the current plan Objective A remains relevant for the NWPCE but an update is recommended to include a clear reference to the circular economy.

Objective A states that *'The Region will implement EU and national waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.'*

#### **Food Waste / Brown Bins:**

The Waste Action Plan for a Circular Economy 2020-2025 recommends adoption of the food waste hierarchy as a priority order in food waste prevention and management. It is recommended that NWPCE must also take account of the food waste hierarchy in designing and implementing policy measures.

The RWMPO have already collaborated with other agencies in a pilot run study, and will continue to be involved in further pilot roll-outs to reduce food waste generation and increase segregation when produced.

Table 2.7 Policy / Legislation Subcategories 4-7

Subcategory	Summary of submissions received
4. Multi Unit Dwellings (MUDs)	A number of submissions expressed the clear need for improved waste segregation for MUDs – better communal areas and also better incentives e.g. pay by weight, for the management company to and in turn the apartment dwellers to segregate waste.
5. End of Waste	A number of submissions expressed the view that timelines for reviewing and granting End of Waste status need to be tighter. Suggestions included that the EPA give more resources to considering EoW applications.
6. Extended Producer Responsibility (EPR)	<ul style="list-style-type: none"> <li>The role of EPR could be enhanced, such as clean up, EPR subsidies to waste companies, and wider responsibility especially regarding plastics.</li> <li>Measures should include clear labelling, and a minimum recycled content.</li> </ul>
7. Incontinence Wear	One submission encourages the Government to go ahead with the scheme previously proposed in 2015, whereby waste costs would be subsidised for those that have heavy residual waste bins because of incontinence wear.

#### **Response and Recommendations of RWMPO:**

##### **Multi – Unit Dwellings ( apartments)**

*Current Plan Policy Action F.1.2 Allocate resources to the systematic monitoring of apartment complexes to improve compliance with the segregation of waste prioritising the reduction of contamination. This policy action remains relevant for the revised or replacement Plan.*

##### **End of Waste**

Reviewing and granting End of Waste applications comes within the role of the Environmental Protection Agency and it is not within the remit of the upcoming NWPCE. However, the RWMPO continue to work on potential national EoW applications and engage with EPA in relation to these projects.

##### **Extended Producer Responsibility (EPR)**

The Waste Action Plan for a Circular Economy 2020-2025 commits to establishing a new EPR scheme for single use plastics (SUP), extend the current tyre scheme and consider additional waste streams: textiles, bulky waste including mattresses, paints, medicines and

farm hazardous waste. It is also noted that the new Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020 set out further rules and details for extended producer responsibility schemes. It is recommended that the new NWPCE commits to a revision of the current approaches to the EPR approval process, governance, transparency and financial rules to improve circularity.

##### **Incontinence Wear**

Regulations regarding the collection and waiver schemes around incontinence wear are not within the remit of the NWPCE but we will bring the concerns to the appropriate legislator.

Table 2.8 Policy / Legislation Subcategories 8-10

Subcategory	Summary of submissions received
8. European Own Resources Tax	One submission expressed concern regarding the European Own Resources Tax relating to non-recycled plastic packaging. Based on EPA new measurement criteria applied in 2018, the OWT for 2020 is estimated at €176m to the Irish Taxpayer. There is a need for full transparency regarding measurement criteria and how outcomes are determined.
9. The EU Landfill Directive and National Landfill Levy Exemption Framework	One submission recommended the following: <ul style="list-style-type: none"> <li>• A comprehensive review of the existing landfill levy exemption framework</li> <li>• In tandem with this review, a regulatory impact assessment on the suitability or otherwise of the proposed waste recovery levies should be undertaken.</li> </ul>
10. EcoModulation Fees	There were two submissions regarding EcoModulation Fee scheme run by Repak. The positives about this scheme were noted, but also that it could be implemented in a better way to promote recyclability / recycled content.

**Response and Recommendations of RWMPO:**

RWMPO will continue to engage on a national basis with policy makers, legislators and agencies as part of ongoing stakeholder engagement including seeking clarification regarding initiatives and issues such as those listed above.

**2.5.2 Enforcement & Regulation**

Table 2.9 Enforcement &amp; Regulation

Subcategory	Summary of submissions received
Regulations for SID / licensing / permitting for waste infrastructure	<ul style="list-style-type: none"> <li>• A number of submissions referred to Strategic Infrastructure Development – how legislation around SID should be reviewed to address restrictive thresholds and timelines, in order to bring about a more expedient system for critically important waste infrastructure projects.</li> <li>• A number of submissions referred to the need for shorter timeframe in making decisions on waste licence applications or reviews.</li> <li>• The need was also expressed for reform of legislation and procedures for planning and licensing / permitting of waste treatment facilities, especially in relation to the long timelines involved in making decisions on applications.</li> </ul>
Enforcement	<ul style="list-style-type: none"> <li>• Recommendation to establish an Environmental Crime Unit to address serious crime in burning and illegal dumping.</li> <li>• Multiagency enforcement campaigns are needed.</li> <li>• For transparency, facilities annual reports should be available online.</li> <li>• Waste legislation needs to be effective and enforceable, and penalties an adequate deterrent.</li> <li>• Good regulation and enforcement assists the circular economy.</li> </ul>

**Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" Report published in August 2021, the wording in the current plan of Objective F remains relevant. This wording states that:

*The Region will implement a consistent and coordinated system for the regulation and enforcement of waste activities in cooperation with other environmental regulators and enforcement bodies.*

- The Waste Action Plan for a Circular Economy 2020-2025 has noted that the role, capacity and responsibilities of the WERLA will be enhanced to position the Local Authority sector better to respond to emerging and priority enforcement challenges.

- An expansion of activities for the WERLAs, as outlined in the Waste Action Plan for a Circular Economy 2020-2025 is being funded by DECC;
- The new recycling targets for municipal waste as well as the planned introduction of the recovery levy of €5 per tonne may encourage more unauthorised waste activity requiring greater enforcement.

The new NWMPCE will include measures to tackle the volume of construction waste generated within the State and the historical and current challenges faced in managing this stream.

## 2.5.3 Environmental Protection

Table 2.10 Environmental Protection

Subcategory	Summary of submissions received
Strategic Environmental Assessment	<ul style="list-style-type: none"> <li>The EPA advises that the authors of the plan should fully consider, as appropriate, the requirements of the Strategic Environmental Assessment Regulations (S.I. 435 of 2004, as amended) and the Habitats Directive, early in the plan-preparation process.</li> <li>The EPA refers the authors to the EPA Synthesis Report on Developing A Strategic Environmental Assessment (SEA) Methodologies For Plans And Programmes In Ireland (and the pre-screening check contained within) to assist in considering whether SEA is required for the Plan.</li> </ul>
Protection of archaeological sites and monuments	<ul style="list-style-type: none"> <li>For waste management facilities, it is important that developments take into account both direct and indirect impacts on archaeological sites and monuments.</li> <li>Consultation of records for archaeological sites and monuments will help developers to minimise adverse impacts on the historic environment. (National Monuments Service)</li> </ul>

### **Response and Recommendations of RWMPO:**

As well as developing a NWMPC, the regions will also prepare in tandem with policy developments a full Strategic Environmental Assessment as well as an Appropriate Assessment and the findings will be considered in aspects of policy development.

Strategic Objective G of the current Plan will continue to be relevant in the new Plan:

*Apply the relevant environmental and planning legislation to waste activities in order to protect the environment, in particular European sites, and human health against adverse impacts of waste generated.*

The principles of protection to human health and the environment from waste operations are central to EU and national policy on the protection of the environment. As such, the intent of Strategic Objective G remains a requirement for the revised or replacement

Plan to ensure waste management in the State is sustainable and offers the highest levels of protection.

The NWMPC will include the new guidance document 'Waste Management Infrastructure – Guidance for Siting Waste Management Facilities', the scope of which includes broad siting criteria and facility specific guidance for consideration when siting a waste facility.

Proximity of proposed facilities to archaeological sites is dealt with at planning stage.

## 2.6 CAPTURE of waste materials for treatment

### 2.6.1 Infrastructure

Table 2.11 Infrastructure: Subcategories 1 and 2

Subcategory	Summary of submissions received
1. Need for Strategic Waste Management Infrastructure	A number of submissions referred to the growing need for strategic waste management infrastructure. Factors such as growing population and economy need to be considered. Regional specific factors need to be considered as well as the national approach. Supports are necessary for developing infrastructure to develop self-sufficiency in handling waste. Preparation for reuse infrastructure should be included.
2. Waste Capacity in general	<ul style="list-style-type: none"> <li>A number of submissions referred to the need for additional waste capacity to be available in case of an unforeseen event, such as increase in waste due to disease outbreak or if export market was restricted. It is proposed that some operating plants be allowed extra contingency storage capacity.</li> <li>More recycling industries and markets in Ireland would help contribute to alleviate waste capacity challenges.</li> <li>The need for export of waste is unlikely to change in the foreseeable future, hence the need to keep export of the materials open as a viable option.</li> <li>There are some developments within Ireland which will help to reduce this need for export of waste, for example a focus on the establishment of a paper recycling solution.</li> </ul>

### **Response and Recommendations of RWMPO:**

In line with the requests in the submissions and the recommendation from the "2021 Evaluation of the Regional Waste Management Plans" the current plan's Strategic Objective E remains relevant. This wording states that:

*The Region will promote sustainable waste management treatment in keeping with the waste hierarchy and the move towards a circular economy and greater self-sufficiency*

- The Evaluation states that whilst there have been significant developments in sustainable waste management treatment infrastructure since the publication of the RWMP in May 2015, there remains scope for future developments under this objective. These developments need to be informed by analysis of existing and predicted generation rates and treatment capacities to

reduce the need for export and increase the role of higher waste activities such re-use, repair and recycle.

- The Regions, following the Civic Amenity Site (CAS) report that they have prepared, intend to push reuse and recycling at CAS.
- The difficulty of management of wastes during emergencies (such as the 2016 capacity issue for municipal waste) was further highlighted by the COVID-19 response to significantly altered public waste management patterns. A response is needed as public health, environmental protection, and national targets remain in force during emergency situations. The coordination of a national response plan and crisis communication strategy for waste management in emergency situations is to be included in the future Plan.



Table 2.12 Infrastructure: Subcategories 3, 4 and 5

Subcategory	Summary of submissions received
3. Waste collection	<ul style="list-style-type: none"> <li>One submission had the view that privatising waste collection was a mistake and that the waste collection system is bureaucratic, and it's important to have a localised approach.</li> <li>Alternative option of private operators tendering for complete routes.</li> </ul>
4. Colour Coding of Bins	<p>One submission made the following points on behalf of its waste industry members:</p> <ul style="list-style-type: none"> <li>There is strong concern about the costs involved for waste collectors changing to the new standard bin colours. The cost of the change should be paid for by the State – anticipated total cost of €75m.</li> <li>Money would be better spent on awareness, education and enforcement.</li> <li>Customers currently know which bin is which. We just need to agree on consistent terminology to facilitate awareness and labelling of packaging.</li> </ul>
5. Waste Codes	<p>One submission noted inconsistencies among authorities - EPA, NTFSO, LAs - regarding certain waste codes. The acceptance of wastes at reprocessing on final treatment often depends on the waste code, so it is critically important to have consistency.</p>

**Response and Recommendations of RWMPO:**

- The new National Waste Management Plan for a Circular Economy will be directed by the adoption of actions outlined at national level in the Waste Action Plan for the Circular Economy with regard to the approach to private waste collection including the setting of recycling targets for collectors, adopting standard colours for bins and waste segregation incentives

- Regarding waste codes, the work of National Working Groups will continue to further the understanding and use of individual waste codes, in accordance with the Environmental Protection Agency's publication '*Waste Classification, List of Waste & Determining if Waste is Hazardous or Non-hazardous*'. The RWMPO and WERLAs are working on standardisation of codes for facility types to ensure a level of consistency in return.

Table 2.13 Infrastructure: Subcategories 6 and 7

Subcategory	Summary of submissions received
6. Recycling Infrastructure	<p>A number of submissions referred to the need to develop recycling, especially in view of more stringent EU targets in the near future.</p> <ul style="list-style-type: none"> <li>The concept of the Proximity Principle was emphasised.</li> <li>Significant improvement in national recycling rates could be achieved through improved segregation.</li> <li>Waste collection companies should take a greater role in driving improvements in waste management behaviours. However, a view was also expressed that the waste collector cannot be held responsible for people's behaviour.</li> <li>It needs to be assessed whether waste going to energy recovery, while beneficial over landfill, might prove a disincentive for recycling.</li> <li>A more incentivised charging structure should be considered for householders and commercial sectors, e.g. pay by weight.</li> <li>Reliance on international markets e.g. Asia is clearly problematic.</li> <li>Fiscal measures could be used to encourage flow of waste up the hierarchy rather than control through planning restrictions, as such restrictions inhibit competition.</li> <li>More researching of MSW recycling rates in the best performing countries – once like is compared with like.</li> </ul>
7. Composting	<p>A number of submissions noted the following points regarding composting:</p> <ul style="list-style-type: none"> <li>Home composting will contribute to achieving 2025 recycling targets and could be up to 5% MSW but more analysis is required.</li> <li>The merits of home composting should be considered particularly for rural areas where collection rates are low.</li> <li>Food outlets that serve compostable packaging should have separate compost bins.</li> <li>Have compost bins on streets as well as more recycling bins.</li> </ul>

**Response and Recommendations of RWMPO:**

- While there have been significant recent developments in sustainable waste management treatment infrastructure, there remains scope for further future developments. The completion of all outstanding authorisations for residual Municipal Solid Waste (rMSW) requires immediate attention. A review of the systems around approvals and authorisations for sustainable waste infrastructure is now required to underpin the economy as it reopens and grows. These developments need to be informed by analysis of existing and predicted generation rates and treatment capacities to reduce the need for export and increase the role of higher waste activities such re-use, repair and recycle.

- The volumes and quality of the waste streams generated are key considerations for the development of infrastructure. Current barriers include insufficient throughput to facilitate a viable treatment investment within the State. However, some indigenous reprocessing and recycling development has been successful (e.g. waste oil) and this policy remains relevant.
- Regarding biowaste, it is recommended that a more detailed assessment of current and projected treatment capacity is undertaken to inform the NWMPC. It is also noted that by the 31st of December 2023, bio-waste must be either separated and recycled at source or collected separately and not mixed with other types of waste.

Table 2.14 Infrastructure: Subcategories 8 and 9

Subcategory	Summary of submissions received
8. Energy Recovery/ Thermal Treatment	<ul style="list-style-type: none"> <li>• There was a number of submissions outlining the positive role of energy recovery, as a preference to landfill disposal, and also contributing to reduction targets for Greenhouse Gas Emissions.</li> <li>• Better balance of energy infrastructure is needed for the three regions.</li> <li>• One submission questioned how can the cement industry charge the waste industry for SRF. SRF displaces fossil fuels.</li> </ul>
9. Landfill	<ul style="list-style-type: none"> <li>• Regarding landfills - whether landfill waste or recovery materials intake should be analysed.</li> <li>• Remediation of historic landfills needs to be prioritised.</li> </ul>

**Response and Recommendations of RWMPO:****Energy Recovery/ Thermal Treatment**

Based on 2020 thermal treatment development, either consented or within the planning/licensing regime, there is an estimated potential total 1,770,000 tonnes per annum of thermal treatment capacity. This would suggest that the required capacity under Policy E15a of the current plan has been achieved by the developments in planning/licensing (subject to grant).

However, the changing profile of waste recovery versus disposal and the ongoing reliance on exports may require further thermal treatment. The RWMPO are monitoring the residual waste capacity on a quarterly basis - these capacity reports indicate that treatment options for residual waste within the country are very tight and we are still reliant on export options to meet our needs.

It is recommended that a detailed review of this residual waste capacity be conducted to inform the retention, modification or omission of this policy in the revised or replacement Plan. This review needs to consider the use of cement kilns as capacity option in Ireland as they are only available when there is a demand for cement product. This was an issue during the COVID-19 pandemic.

**Landfill**

Priority will be continue to be given to the remediation of historic landfills. A co-ordinated system has been established, whereby Historic Landfill Regional Co-ordinators are now liaising with authorities and DECC as well as linking on an interregional basis, with a view to achieving landfill remediation targets. The investigations and remediation are currently funded by DECC.

Table 2.15 Infrastructure: Subcategories 10 and 11

Subcategory	Summary of submissions received
10. Bring Banks	<p>A number of submissions referred to the need for greater number of bring banks:</p> <ul style="list-style-type: none"> <li>• The density of bring banks per population needs to be greater for achieving higher recycling - specially for glass and textiles</li> <li>• There should be one per 1000 people. This deficit should be addressed and also ensure that they are convenient and accessible for the public.</li> <li>• There is a need for more textile bring banks, and greater take-back at stores.</li> </ul>
11. Civic Amenity Sites	<p>A number of submissions covered recommendations in relation to Civic Amenity Sites:</p> <ul style="list-style-type: none"> <li>• More CAS would be welcome, especially around larger population centres.</li> <li>• The new plan should encourage co-location of CAS with transfer stations.</li> <li>• Residual waste accepted at CAS should not be a cheap alternative to kerbside</li> <li>• Anyone bringing residual waste to CAS should be registered as a customer and should justify why they do not have kerbside.</li> <li>• All residual waste at CAS should be weighed- data can then be analysed same as for kerbside for individual customers.</li> <li>• While CAS may receive funding, customer should be charged the full amount for residual waste.</li> <li>• There should be adequate reception facilities to preserve the reuse potential of items. This should be included in tender contracts for CAS.</li> <li>• Operators should be encouraged to partner with or provide priority access to donated materials for social enterprises.</li> <li>• Reuse data from CAS should be made available</li> </ul>

**Response and Recommendations of RWMPO:****Existing Plan policies under Strategic Objective E of the current plan include:**

*E3a The local authorities in the region will maintain and develop their existing networks of bring infrastructure (e.g. civic amenity facilities, bring banks) to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes.*

*E3b The Plan supports the development by the private sector of public bring infrastructure (e.g. civic amenity facilities, bring banks) subject to appropriate statutory approvals and in line with appropriate environmental protection criteria.*

- These general policies on CAS and bring centres will continue to apply in the new Plan.
- The Regions' 2020 CAS report contains a series of recommendations on integration and consolidation of the CAS network and the implementation of its recommendations will be a requirement of the revised or replacement Plan. CAS operators will be obligated to engage with Producer Responsibility Initiatives to evaluate options for facilitating reuse and repair. This will include engaging with social enterprises and similar organisations.
- Regarding textiles, a new system for improved reporting on the nature and extent of used textiles is required to support tackling this waste stream.

Table 2.16 Infrastructure: Subcategory 12

Subcategory	Summary of submissions received
12. Data	<p>A number of submissions outlined the need for extensive and reliable data.</p> <ul style="list-style-type: none"> <li>Recent data reports by the RWMPO have been very beneficial –it is important for this to continue, e.g. C&amp;D waste data, reporting on CAS, quarterly reports on MSW.</li> <li>The EPA, supported by the National Waste Collection Permit Office has established a National Waste Data Network and look forward to working closely with the Regional Waste Management Planning Offices and other key stakeholders.</li> <li>There is a need for robust indicators to monitor and assess the implementation and effectiveness of the Plan over its lifetime, including annual implementation reports.</li> <li>In looking at waste projections for the forthcoming plan, consideration should be given to the number of households that do not currently avail of a kerbside collection. There is a need to establish better quality information on the scale of this unaccounted for waste, and how it is being managed</li> <li>Significant costs are incurred by Local Authorities and the State to deal with waste management covering a range of issues such as litter and waste enforcement. There is limited data on these actual costs, in particular the costs associated with the management of unauthorised waste deposits and enforcement of same.</li> <li>A better understanding of the recycling rate for all materials (similar to packaging data) would help the waste industry to identify and target areas that could be improved.</li> <li>The availability of accurate and timely data on waste data and data flows is a prerequisite to achieving policy alignment at national and regional level and in planning strategic waste infrastructure and identifying potential capacity gaps.</li> <li>Waste characterisation studies are extremely important.</li> </ul>

**Response and Recommendations of RWMPO:**

- In terms of data management and flow, the recommendations for a more comprehensive, shared and timely reporting system are included in the Waste Action Plan for a Circular Economy 2020-2025. Once a successful dynamic and transparent reporting system is implemented, it will aid in the tracking of performance to targets, identifying capacity issues and helping to improve behaviour change.
- Key performance indicators relating to policy actions and targets have been used in the periodic reporting to facilitate

improved waste management. This data management reporting is central to monitoring improvement of management performance. While periodic reporting provides a valuable monitoring regime to track progress, the non-availability of up to date waste data has been cited as a barrier to measuring performance and a more dynamic data reporting regime is required as recommended in the Waste Action Plan for a Circular Economy 2020-2025.

- The frequency of reporting should also be considered to maximise the balance between performance management and data availability for reporting.

- The EPA have setup a National Waste Data Network with the primary objectives:-
  - Facilitate engagement and cooperation between the public bodies in relation to waste data management;
  - Drive improvements in the quality and timeliness of national waste data and increase confidence in the accuracy of outputs;
- Maximise the lawful sharing of waste data with a view to improving Ireland's capacity for tracking waste flows through the waste management network and supporting related enforcement and regulatory functions

Table 2.17 Infrastructure: Subcategories 13 and 14

Subcategory	Summary of submissions received
13. Pay to Use units (PTUs)	<p>A number of submissions included differing views on the use of PTUs</p> <ul style="list-style-type: none"> <li>The view of a PTU operator is that PTUs play an important role in waste management infrastructure – catering for many large households with extra waste or small households with little waste, also short term lets, holiday homes, and that PTUs are not in competition with private kerbside collectors, but a necessary support.</li> <li>Two waste collection companies generally expressed the following views:           <ul style="list-style-type: none"> <li>Pay to Use compactors are not compatible with achieving even minimal recycling rates, nor the future higher targets.</li> <li>If an outright ban is not an option, then the same recycling target rates should be applied to PTUs.</li> <li>PTU facilities should only be permitted where there is an absence of kerbside collection and civic amenity sites.</li> </ul> </li> </ul>
14. Deposit & Return Scheme DRS	<p>Two submissions referred to DRS:</p> <ul style="list-style-type: none"> <li>Request that the commercial foundations essential to the operation of green bin (recyclables) collection are not undermined by the rollout of DRS.</li> <li>Promotion of Digital Deposit and Return Scheme as the best environmental option and one that is most convenient for consumers.</li> </ul>

**Response and Recommendations of RWMPO:****PTUs**

Policy Action E23 of the current Plan states: *In the absence of kerbside source segregated collection services and where the proximity of civic amenity facilities and bring centres is prohibitive the plan supports localised collection solutions such as community drop off points or pay to use systems subject to compliance with the household waste collection regulations*

This policy action remains relevant for the NWMPE.

**Deposit & Return Scheme**

The consultation paper on Ireland's Deposit Return Scheme (DRS) sets out how PET plastic bottles and aluminium drinks cans will be introduced to allow for greater recycling of these streams through retailer take back schemes which will also aid in kerbside segregation.



## 2.6.2 Other Specific Waste Streams

Table 2.18 Other Specific Waste Streams

Subcategory	Summary of submissions received
Hazardous waste	<ul style="list-style-type: none"> <li>The amount of hazardous waste produced in Ireland continues to increase, but Ireland still does not have the range of facilities to deal with all of the hazardous waste generated. Overall 65 per cent of Ireland's hazardous waste was exported in 2019.</li> <li>The new plan should have regard to the recommendations and data within the new National Hazardous Waste Management Plan (NHWMP).</li> <li>LAs should publish in January each year a schedule of collection days for large household items, paints/chemicals /haz waste, WEEE. Needs of those in poverty and without transport should be taken into account.</li> </ul>
Biosolids	<p>The points made in two submissions are as follows:</p> <ul style="list-style-type: none"> <li>The new WMPCE provides an ideal opportunity to assess the value that may be extracted from wastes that contain carbon, such as biosolids.</li> <li>Consider the need for investment in alternative sludge treatment infrastructure given likelihood of more stringent EU policy.</li> <li>There is limited Anaerobic Digestion (AD) capacity to treat animal slurries, which is a lost opportunity.</li> <li>Ireland's current biological treatment capacity is heavily utilised to stabilise organic fines rather than producing high quality compost.</li> <li>We are currently exporting a lot of food waste to Northern Ireland for treatment.</li> <li>Consider incentivising indigenous biological treatment options to produce higher value outputs and/or renewable energy, possibly including financial incentives to encourage more AD of biowaste and agricultural waste.</li> </ul>
Construction & Demolition Waste	<p>A number of submissions referred to the need to have better waste management on construction sites, such as the following:</p> <ul style="list-style-type: none"> <li>More specific detail in Construction Waste Management Plans</li> <li>Closer scrutiny of waste management performance</li> <li>The development of standards / End of Waste status for waste materials arising from construction &amp; demolitions</li> <li>Pay by Weight charging for C&amp;D waste</li> <li>Applying minimum recycled content levels, and/or levies to virgin materials where alternative secondary material is available.</li> </ul>

### **Response and Recommendations of RWMPO:**

- The RWMPO will be cognisant of the policies in the revised National Hazardous Waste Plan and the requirements to develop hazardous waste collection systems for households.
- Regarding management of waste sludge, RWMPO will engage in discussions with Irish Water to determine how further progress

can be achieved in the treatment of waste sludge.

- The RWMPO will continue to promote new developments in the treatment of biowastes.
- Specific measures to drive more effective prevention and management of construction waste, will include enhancement and promotion of Circular Economy guidance and training resources for the construction supply chain.

## 2.6.3 Innovation

Table 2.19 Innovation

Subcategory	Summary of submissions received
Innovation in general	<ul style="list-style-type: none"> <li>There should be support from Government to help Irish businesses that are innovating in the area of lightweighting and developing recyclable packaging materials.</li> <li>Reward EcoDesign – we must ensure we do not punish those who are making efforts to eco-design their products. With reference to Repak EMF scheme – Repak would continue to levy high EMF on monomaterial flexible plastics. This means no incentive to switch to monomaterial packaging and a more circular waste stream.</li> <li>The Plan should encourage and support new technologies as the waste sector is constantly evolving. IWMA support a digital Deposit and Return Scheme as the best environmental option and one that is most convenient for consumers. We can and should be leaders in waste management as Ireland is a very progressive country in many areas including digital technology.</li> <li>Promotion of pyrolysis – this would be better than incineration or landfill. No toxins emitted and Recovered Carbon Black would be of value.</li> <li>For handling less attractive products such as soft plastic and coloured rigid plastics, it is suggested that there be supports for the following: <ul style="list-style-type: none"> <li>Chemical depolymerisation yielding monoethylene glycol</li> <li>Pyrolysis can deal with troublesome polymers e.g. PS</li> <li>Gasification yielding ethanol</li> <li>Hydrothermal treatment yielding synthetic crude oil.</li> </ul> </li> </ul>

### **Response and Recommendations of RWMPO:**

- Under the current Plan Policy D4, the RWMPO have sought to participate in funding for research and innovation and have had some success in this matter as listed in the Plan Evaluation. On an ongoing basis, the RWMPO are establishing links with research institutions to further strengthen the RWMPO offering for future research calls. This policy action remains relevant for consideration in the revised or replacement Plan.

- The Plan Evaluation has identified the importance of innovation in its own right in the capturing of resources and therefore the new Plan will include a Strategic Objective on Innovation - under the theme of Capture.

# 3.0 ONLINE SUBMISSIONS

## Summary of Online submissions received via MyWaste.ie

Members of the public were invited either to make a written submission to SRWMO or alternatively to make their submission online via MyWaste.ie.

In addition to completion of an online questionnaire, results of which are presented graphically, the public were also invited to add specific comments. Most comments were brief

rather than being very detailed. General areas addressed by a large number of respondents included the need for reduction in packaging, in particular single use packaging, especially plastics. Many comments also covered issues relating to household waste collection and management and how its operation could be improved.

## 3.1 Results of the Questionnaire

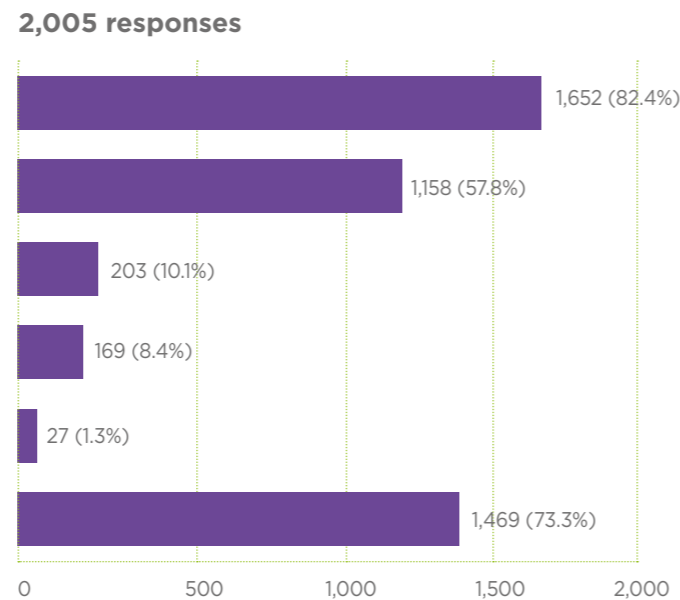


Figure 3.1 How do you manage your household waste?

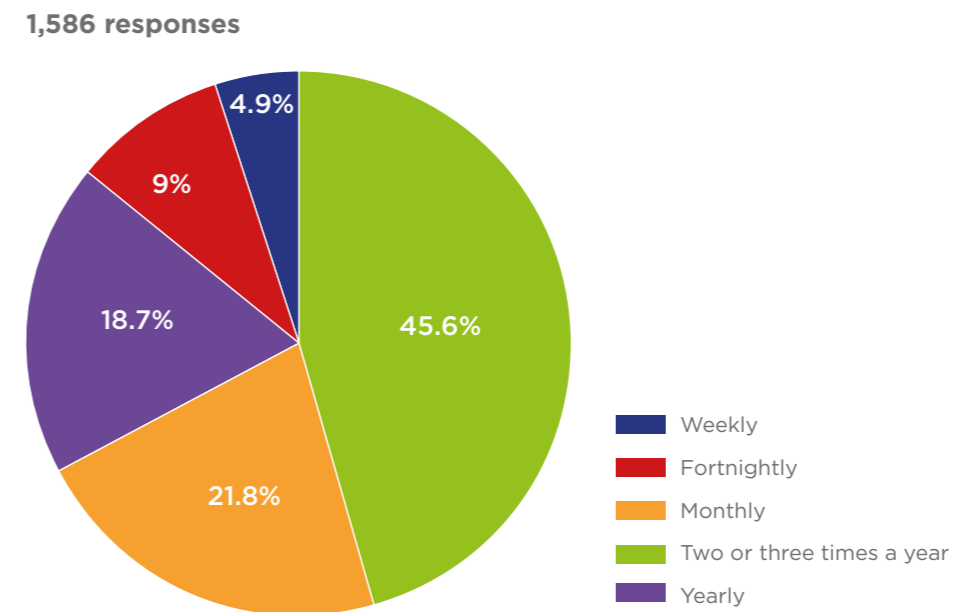


Fig 3.2 If you visit your local civic amenity site (recycling site) how often?

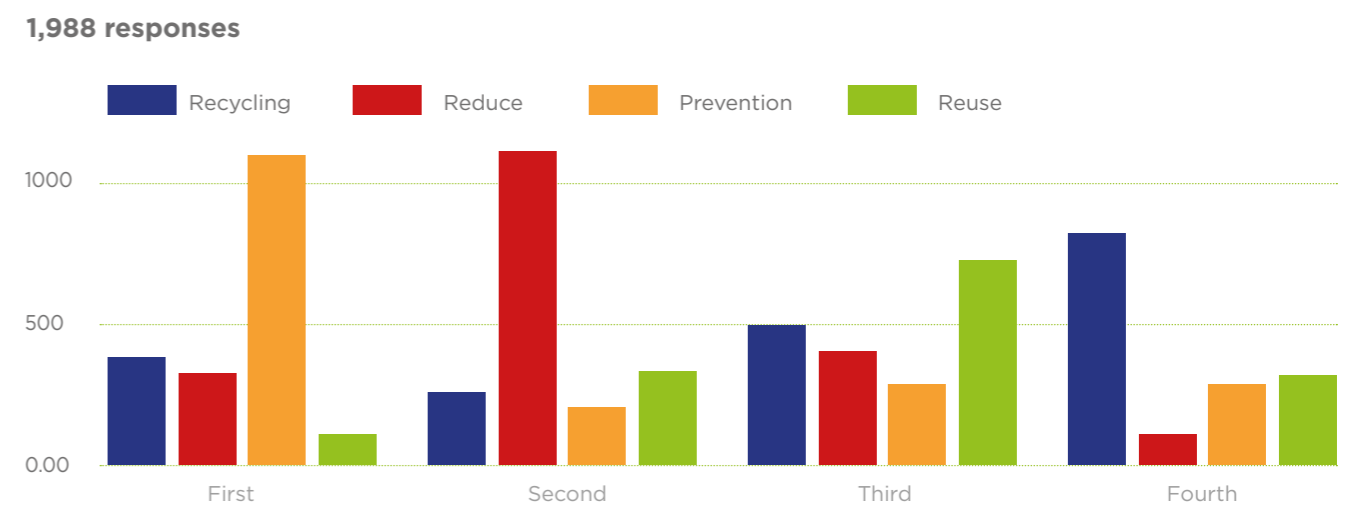


Fig 3.3 Rank the following 4 issues in order of importance to you

1,983 responses

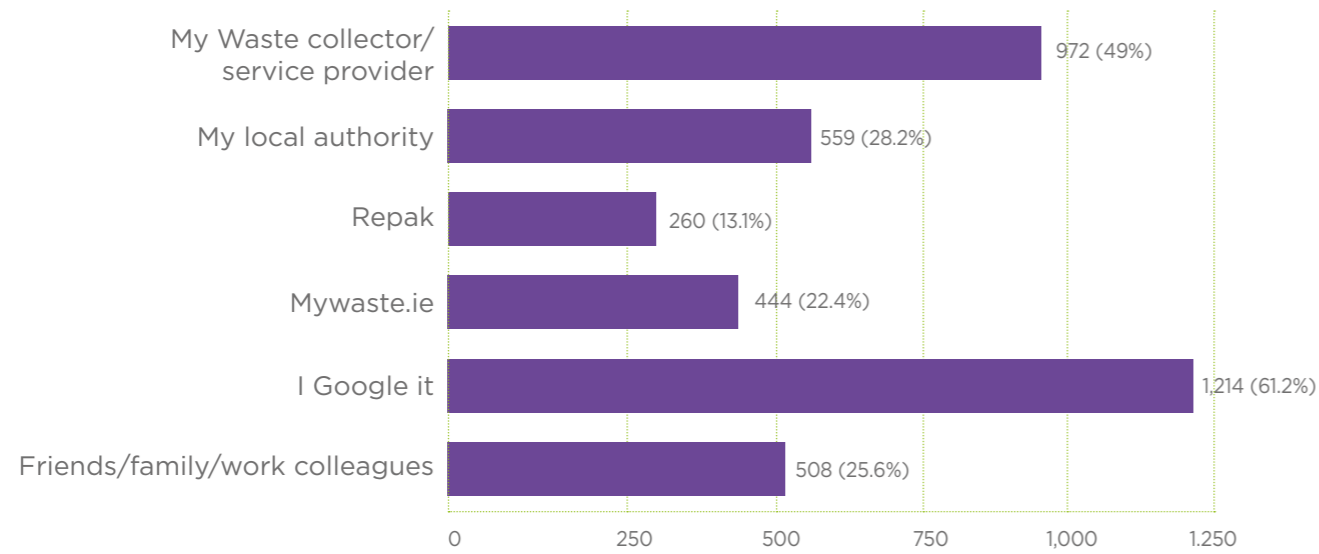


Fig 3.4 Where do you get information about what to do with your waste?

2,000 responses

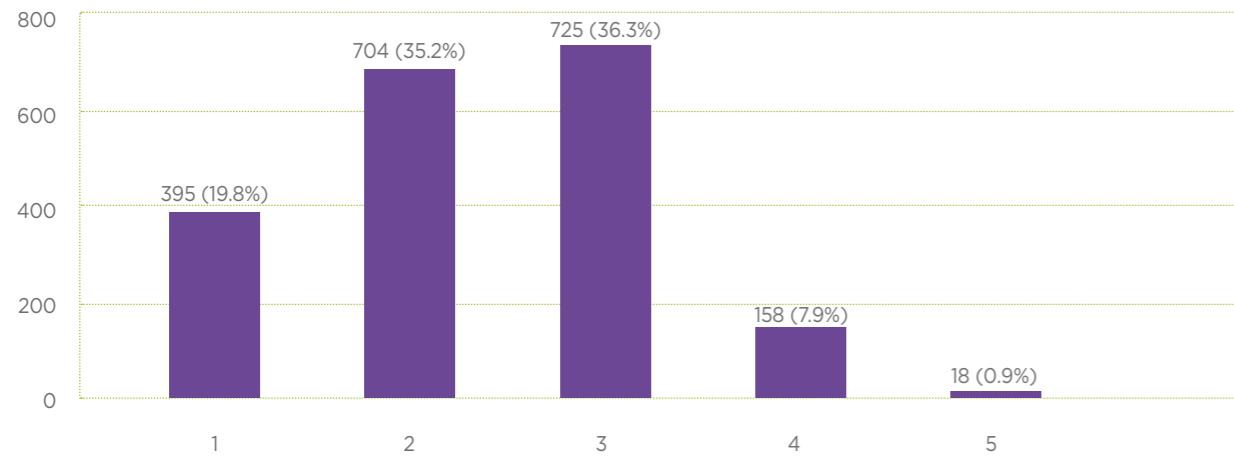


Fig 3.5 How would you rate waste management in Ireland?

1,948 responses

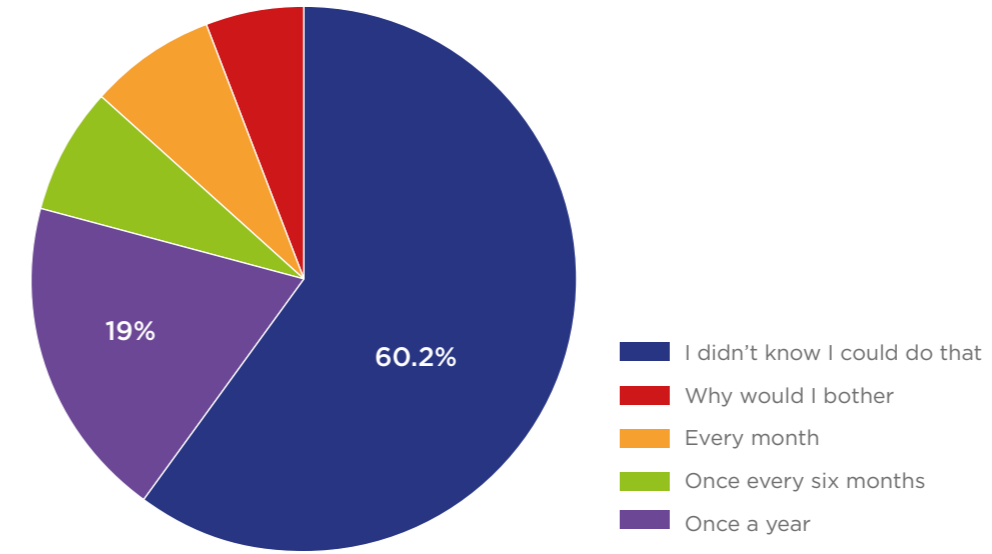


Fig 3.6 How often do you get information on managing waste or your recycling performance from your waste collector?

### 3.2 The Issues Raised in Online Submissions

Of the 1055 individual comments submitted, the following gives an overview of the main issues raised. Like the summary of the written submissions, the online submissions have been categorised under the themes of Circularity, Consumption, Compliance and Capture. Given

that the parallel approach with these themes is in the same format as the summary of written submissions in Section 2 of this report, the RWMPO responses and recommendations as outlined in Section 2 will also apply to the online submissions.

### 3.3 CIRCULARITY

Table 3.1 Circularity

Subcategory	Summary of online submissions
General	<p>Many of the improvements proposed were all within the theme of circularity, without the respondent necessarily thinking or knowing that their proposed approach related to circularity and the circular economy. The following excerpts give some examples of specific comments:</p> <p><i>'As an island nation, we are uniquely positioned to drive a circular economy to reduce how much goods we import, and how much waste we need to export.'</i></p> <p><i>'There should be more support for circular economy projects at a local level e.g. Local community initiatives in rural areas...'</i></p>



## 3.4 CONSUMPTION

### 3.4.1 Prevention

Table 3.2 Prevention

Subcategory	Summary of online submissions
Education and Awareness	One of the general threads through the submissions was that more promotion on different media is needed to show people what can and cannot be recycled, as well as the better choices that consumers can make.
Packaging	Views and suggestions included the following <ul style="list-style-type: none"> <li>• Producers and retailers should be held more responsible for the quantities and nonrecyclability of packaging, especially plastic.</li> <li>• Compostable or biodegradable packaging was the better option for packaging that cannot be avoided.</li> <li>• Very few outlets provide refill, packaging free options.</li> <li>• There were queries regarding the lack of recycling of soft plastics.</li> <li>• Many submissions favoured a Deposit Return Scheme for plastic bottles and drinks cans and glass.</li> </ul> <p><i>'...Supermarkets/producers wrap food items in so much packaging which we need to dispose of. We are also forced to buy predetermined quantities which a lot of the time leads to excess waste.'</i></p>
Reuse	Prevention and reuse are seen by respondents as the best options, with several suggestions for reuse, such as reusable nappies, school book and uniform exchange schemes, and also to have more general opportunity to rent / borrow items that are only needed occasionally.

### 3.4.2 Resource Efficiency

Table 3.3 Resource Efficiency

Subcategory	Summary of online submissions
General	Many submissions emphasised the role that the producer and retailer have to play in avoidance of excess packaging (a resource in itself) as well as general resource efficiency in production. <p>The following are examples of comments relevant to resource efficiency:</p> <p><i>'...Individuals trying to go zero or low waste is just a small part of the real solution - encouraging manufacturers and retailers to use less resources in the production and marketing of food and other household goods.'</i></p> <p><i>'I think a key thing is to discourage manufacturers from using plastics and packaging that are not reusable or recyclable, and to encourage them to use less packaging in the first place.'</i></p>

### 3.4.3 Climate

Table 3.4 Climate

Subcategory	Summary of online submissions
General	Many of the suggestions that were made for reducing waste would also help to address the challenge of climate change. The following are examples of comments relating specifically to climate: <p><i>'There are lots of positives with reuse options but I believe we can do much more. Education and collaboration are key to reducing Ireland's CO2 emissions.'</i></p> <p><i>'I think at minimum the local authorities have an opportunity to set an example and take a stronger stance on climate targets.'</i></p>

## 3.5 COMPLIANCE

### 3.5.1 Policy / Legislation

Table 3.5 Policy / Legislation

Subcategory	Summary of online submissions
General	Suggestions regarding policy development included the following: <ul style="list-style-type: none"> <li>• Producer responsibility should be extended to certain other streams, such as mattresses, bulky goods etc.</li> <li>• The system for collection of household waste should be taken back by local authorities, or tendered out per area - this would avoid current situations where there could be a number of bin trucks serving the one small housing estate or roadway.</li> <li>• There should be a central tax system that would cover the cost of waste collection, rather than individual householders having the choice themselves on whether to sign up to a service.</li> <li>• A deposit and return scheme should be introduced covering plastic bottles, cans and glass bottles.</li> </ul> <p><i>'There is a direct correlation between the prevalence of illegal dumping and the level of waste charges. We should be paying for waste ( and water) centrally through LPT / Taxes to bring it back into contract. Currently illegal waste is a blight and the cost of waste is firmly shared between local authority and the compliant majority.'</i></p>

### 3.5.2 Enforcement & Regulation

Table 3.6 Enforcement & Regulation

Subcategory	Summary of online submissions
General	<p>The main thrust of comments relating to waste enforcement was that there should be more of it, in relation to waste regulations and byelaws. It was felt that there should be issuing of more and higher fines, including for illegal dumping and littering.</p> <p><i>'More fines should be issued to people that don't separate their waste accordingly, I am constantly seeing the wrong items in bins.'</i></p> <p><i>'There is far too much littering and flytipping. Local councils do not enforce the bye laws requiring households to dispose of their waste responsibly.'</i></p>

### 3.5.3 Environmental Protection

Table 3.7 Environmental Protection

Subcategory	Summary of online submissions
General	<p>Most submissions covered specific aspects of waste management, such as the importance of information campaigns, and the need for an integrated system of waste management services. These actions would in turn help to protect the environment. Examples of comments referring more specifically to environmental protection are as follows:</p> <p><i>'As well as climate change running a strand through waste management, environmental impact should also be central, e.g. impact on wildlife of not providing sufficient public bins/ street cleaning and consequent littering.'</i></p> <p><i>'Bio-diversity should be promoted in line with reducing and recycling.'</i></p>

## 3.6 CAPTURE

### 3.6.1 Infrastructure

Table 3.8 Infrastructure

Subcategory	Summary of online submissions
1. General	<ul style="list-style-type: none"> <li>It was felt that if people knew more about the destination of recyclables, then they would be encouraged to separate better for recycling.</li> <li>Ireland should look to good practices in other countries.</li> <li>There is a need for public bins to include segregation for recyclables and food waste - retailers should provide them outside their shops.</li> </ul>
2. Household Waste Collection	<ul style="list-style-type: none"> <li>Glass bottle collection for all households was proposed.</li> <li>Food Waste/ brown bin collection for all households was proposed, i.e. including rural areas and apartment blocks.</li> <li>Apartment block management companies should be held more responsible for providing proper waste segregation bins.</li> </ul> <p><i>'... There is currently zero incentive to segregate waste in apartment complexes. We should be able to 'pay by weight' and a polluters pays policy should apply! Please put a requirement for management agencies/ companies to provide a 'pay-by-weight' for residents into the circular plan.'</i></p>
3. Bring banks and civic amenity sites	<ul style="list-style-type: none"> <li>There were many proposals for increased number of bring banks, especially for glass. It was questioned why plastic and paper bring banks are no longer available. It was also questioned why textile banks aren't available for non-reusable textiles.</li> <li>Glass bottle banks should be emptied more frequently as they are often overflowing, causing broken glass in the area.</li> <li>Many feel there should not be charges for recycling at Civic Amenity sites, and that the charges can vary from one CAS to another. It was felt that people should not be charged for their recycling efforts.</li> <li>CAS opening hours were considered too limited by a number of people, especially for those who work full time, hence the CAS should be open at weekends, as someone is unlikely to take time of work to take waste to the CAS.</li> <li>Some proposed a reuse facility to be run as part of a CAS.</li> </ul> <p><i>'Recycling centres need to more customer focused. Opening times need to extend. Incentives to recycle more, especially bulky items.'</i></p> <p><i>'...that civic amenities sites exist and are very cost effective does not seem to be general knowledge.'</i></p>
4. Bulky Waste	<p>It was proposed that there should be periodic collections of bulky waste from households, e.g. furniture and mattresses, especially considering that people may not have suitable transport or not have the personal capability of hauling bulky waste, as well as the considerable cost involved to have bulky waste removed.</p>

### 3.6.2 Other Waste Streams

Table 3.9 Other Waste Streams

Subcategory	Summary of online submissions
Specific Waste Streams	<p>Suggestions were as follows:</p> <ul style="list-style-type: none"> <li>• Civic Amenity Sites should accept a wider range of hazardous wastes, e.g. paints and oils, and also there should be a regular collection for them e.g. annual or twice a year.</li> <li>• Construction waste needs better segregation and recycling.</li> <li>• Biowastes e.g. garden woody material need better treatment.</li> <li>• Take back scheme for medicines was proposed.</li> </ul>

### 3.6.3 Innovation

Table 3.10 Innovation

Subcategory	Summary of online submissions
General	<p>The theme of innovation applies to many of the suggestions that were made for increasing the sustainability of packaging at producer and retailer level, as well as the need for improved waste management. Examples of more specific comments are as follows:</p> <p>'I firmly believe that Ireland should invest heavily and aim to become a world leader in waste management. There should be a recycling /research centre in the country that is publicly owned and aimed at research over profit...'</p> <p>'There should also be investment in product design courses aimed at sustainable packaging, or a competition for sustainable packaging aimed at product design students etc.'</p>

#### Response of RWMPO to online submissions

The RWMPO acknowledge the input of all who completed the online questionnaire and made specific suggestions in the comments box. The responses to the questionnaire itself provided the RWMPO with an overall general understanding of the participants' perception in relation to the Circular Economy.

Many entries highlighted the same areas of concern, i.e. the need for more education and awareness, sustainability of packaging, reduction of single use packaging and the

need for introduction of Deposit and Return Scheme, as well as improvements needed for better and more streamlined household waste management.

The summary of the online submissions is largely in parallel with the summary for written submissions, i.e. within the themes of Circularity, Consumption, Compliance and Capture, hence the RWMPO responses and recommendations for each of these themes as outlined in Section 2 of this report can be understood to cover both online and written submissions.

## 4.0 OVERALL CONCLUSION TO PRE-DRAFT CONSULTATION

The Regional Waste Management Planning Offices have considered the submissions that were received as part of the pre-draft consultation process, in the preparation of the draft National Waste Management Plan for a Circular Economy. Submissions included those received in detailed written format from a range of stakeholders such as relevant agencies and industry, as well as significant online input from members of the public through MyWaste.ie.

Submission content acknowledged Ireland's successes to-date, and the need for further ongoing progress in working towards circularity through waste prevention and optimisation for material usage, i.e. making more with less. The new way is to see end of life materials and goods, not as waste, but as resources of value that warrants their retention in a continuous reuse, recycling and recovery loop, with minimum need for final disposal.

The consultation outcomes will contribute greatly to the formulation of the new Plan around the central themes of Circularity, Consumption, Compliance and Capture, all of which rely on the support of and collaboration with all the different stakeholders including people in general. The following excerpts are a demonstration of the many constructive suggestions that were received in the pre-draft submissions:

*'Resilience should be a key factor underlying the preparation of the plan. This includes climate proofing of plan actions and recommendations to ensure the plan is aligned to national climate ambitions and targets. It should also consider measures to enhance infrastructural resilience through using learnings from recent events such as Brexit and the Covid pandemic.'* EPA

*'Promote Reuse at Civic Amenity Sites -The department recently issued its evaluation of civic amenity sites and how they can be improved. We concur that there must be more standardisation of the services and fees*

*charged. Additionally, we believe that there is great potential in some of the sites for reuse activities, including the collection of items for repair and reuse as well as courses on reuse and upcycling opportunities. We support the development of 'Recovery Parks.'* VOICE Ireland

*'The awareness and education campaigns will need much larger budgets if Ireland is to increase recycling rates. We need to make it a high priority for the majority of people if we are to have a step change in waste management performance in the country.'* IWMA

*'Packaging reuse will form an integral part of the circular economy and must be clearly defined in terms of what constitutes as reuse from both a business and consumer perspective.'* Repak

All the interest shown by the Plan stakeholders through this public consultation process and anticipated ongoing future support is what will help to ensure the success of Ireland's new National Waste Management Plan for a Circular Economy. The co-ownership model for development and implementation of the Plan is agreed in principle and how this approach can be achieved in practice will be considered as part of the Plan preparation.

The Draft New Waste Management Plan for a Circular Economy will consider these submissions and there will be another opportunity to influence plan progress when the draft plan is published for public consultation.



# APPENDIX A: NEWSPAPER NOTICE

Statutory Newspaper Notice published on 11th March 2021 in the following:

Irish Examiner, Irish Daily Mail, The Irish Independent, The Irish Sun, The Irish Times

**PUBLIC NOTICE**

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

Notice of Intention to commence preparation of the **National Waste Management Plan for a Circular Economy** to replace the existing Regional Waste Management Plans. This plan will be subject to a Strategic Environmental Assessment and an Appropriate Assessment.

A Briefing Note and the current Regional Waste Management plans can be viewed at [www.mywaste.ie](http://www.mywaste.ie)

Written submissions in relation to the preparation of the plan can be made to [info@srwmo.ie](mailto:info@srwmo.ie) or by post to Southern Region Waste Management Office, Lissanalta House, Dooradoyle Road, Limerick, V94 K6PO and/or by completing a short questionnaire on [www.mywaste.ie](http://www.mywaste.ie) by close of business on the **6th May 2021**.

This the **National Waste Management Plan for a Circular Economy** will be in respect of the Local Authority administrative areas as set out in the table below.

Region	Lead Authority	Local Authorities
Eastern-Midlands Region	Dublin City Council	Dun Laoghaire-Rathdown, Fingal, Kildare, Laois, Longford, Louth, Meath, Offaly, South Dublin, Westmeath & Wicklow.
Connacht-Ulster Region	Mayo County Council	Cavan, Donegal, Galway City, Galway County, Leitrim, Monaghan, Roscommon & Sligo.
Southern Region	Limerick City and County Council & Tipperary County Council	Carlow, Clare, Cork City, Cork County, Kerry, Kilkenny, Waterford & Wexford.



southern  
waste region



eastern - midlands  
waste region



connacht-ulster  
waste region

[www.mywaste.ie](http://www.mywaste.ie)

# APPENDIX B: ORGANISATIONS THAT MADE WRITTEN SUBMISSIONS FOR PRE-DRAFT CONSULTATIONS\*

AON Apartment Owners Network

Ballynagran Landfill Ltd

Beauparc

BIGbin Waste Tech Ltd

Cement Manufacturers Ireland

CEWEP Ireland -Confederation of European Waste-to-Energy Plants

Clare Public Participation Network

Community Resources Network Ireland (CRNI)

Development Applications Unit, Government Offices

Environmental Protection Agency (EPA)

Indaver Ireland

Irish Food Packaging Alliance (IFPA)

Irish Waste Management Association (IWMA)

Maeve Thornberry & Associates

REPAK

VOICE of Irish Concern for the Environment

Zero Waste Alliance

\*Two private individuals made written submissions which were also considered in preparation of the draft plan.





## APPENDIX 5

### List of Waste Legislation

National Waste Legislation
S.I. No. 471/2023 - Waste Management (Facility Permit and Registration) (Amendment) Regulations 2023
S.I. No. 406/2023 - Circular Economy (Waste Recovery Levy) Regulations 2023
S.I. No. 398/2023 - Waste Management (Landfill Levy) (Amendment) Regulations 2023
S.I. No. 394/2023 - Statistics (Waste Generation and Treatment Survey) Order 2023
S.I. No. 345/2023 - Circular Economy and Miscellaneous Provisions Act 2022 (Commencement of Certain Provisions) (No. 3) Order 2023
S.I. No. 344/2023 - Circular Economy and Miscellaneous Provisions Act 2022 (Commencement of Certain Provisions) (No. 2) Order 2023
S.I. No. 343/2023 - Circular Economy (Environmental Levy) (Plastic Bag) Regulations 2023
S.I. No. 104/2023 - Waste Management (Collection Permit) (Amendment) (No. 2) Regulations 2023
S.I. No. 63/2023 - Waste Management (Collection Permit) (Amendment) Regulations 2023
S.I. No. 49/2023 - Circular Economy and Miscellaneous Provisions Act 2022 (Commencement of Certain Provisions) Order 2023
S.I. No. 16/2023 - Waste Management (Prohibition of Waste Disposal by Burning) (Amendment) Regulations 2023
Act No. 26/2022 - Circular Economy and Miscellaneous Provisions Act 2022
S.I. No. 612/2022 - European Union (Extended Producer Responsibility) (Fishing Gear Containing Plastic) Regulations 2022
S.I. No. 611/2022 - European Union (Extended Producer Responsibility) (Balloons) Regulations 2022
S.I. No. 610/2022 - European Union (Extended Producer Responsibility) (Wet Wipes) Regulations 2022
S.I. No. 609/2022 - European Union (Extended Producer Responsibility) (Tobacco Filters Containing Plastic) Regulations 2022
S.I. No. 420/2022 - Circular Economy and Miscellaneous Provisions Act 2022 (Commencement of Certain Provisions) Order 2022
S.I. No. 351/2022 - European Union (Port Reception Facilities for the Delivery of Waste From Ships) Regulations 2022
S.I. No. 191/2022 - European Union (Restriction of Certain Hazardous Substances in Electrical and Electronic Equipment) (Amendment) Regulations 2022
S.I. No. 51/2022 - Waste Management (Prohibition of Waste Disposal by Burning) (Amendment) Regulations 2022
S.I. No. 296/2021 - European Union (Port Reception Facilities for the Delivery of Waste from Ships) Regulations 2021
S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2020
S.I. No. 322/2020 - European Union (Packaging) Regulations 2020
S.I. No. 82/2020 - European Union (End-of-Life Vehicles) (Amendment) Regulations 2020
S.I. No. 130/2020 - European Union (Waste Management) (Environmental Impact Assessment) Regulations 2020
S.I. No. 321/2020 - European Union (Landfill) Regulations 2020
S.I. No. 233/2019 - European Union (Waste Electrical and Electronic Equipment) (Amendment) Regulations 2019
S.I. No. 182/2019 - Waste Management (Landfill Levy) (Amendment) Regulations 2019
S.I. No. 250/2019 - Waste Management (Facility Permit and Registration) (Amendment) Regulations 2019
S.I. No. 618/2019 - European Union (Waste Licensing) (Amendment) Regulations 2019



National Waste Legislation
S.I. No. 183/2018 - European Union (End of Life Vehicles) (Amendment) Regulations 2018
S.I. No. 96/2018 - Waste Management (Tyres and Waste Tyres) (Amendment) Regulations 2018
S.I. No. 598/2017 - Waste Management (Tyres and Waste Tyres) (Amendment) Regulations 2017
S.I. No. 400/2017 - Waste Management (Tyres and Waste Tyres) Regulations 2017.
S.I. No. 265/2017 - European Communities (Marine Strategy Framework) (Amendment) Regulations 2017
S.I. No. 396/2017 - Waste Management (Farm Plastics) (Amendment) Regulations 2017.
S.I. No. 315/2016 - European Union (Waste Directive) (Amendment) Regulations 2016.
S.I. No. 566/2016 - European Union (End of Life Vehicles) (Amendment) Regulations 2016.
S.I. No. 24/2016 - Waste Management (Collection Permit) (Amendment) Regulations 2016.
S.I. No. 346/2016 - Waste Management (Collection Permit) (Amendment) (No. 2) Regulations 2016.
S.I. No. 189/2015 - Waste Management (Landfill Levy) Regulations 2015
S.I. No. 355/2015 - European Communities (Birds and Natural Habitats) (Amendment) Regulations 2015
S.I. No. 430/2015 - European Union (Household Food Waste and Bio-waste) Regulations 2015.
S.I. No. 197/2015 - Waste Management (Collection Permit) (Amendment) Regulations 2015.
S.I. No. 198/2015 - Waste Management (Facility Permit and Registration) (Amendment) Regulations 2015.
S.I. No. 320 of 2014 - Waste Management (Facility Permit and Registration)(Amendment) Regulations 2014
S.I. No. 546 of 2014 - Waste Management (Facility Permit and Registration)(Amendment) Regulations 2014
S.I. No. 149/2014 - European Union (Waste Electrical and Electronic Equipment) Regulations, 2014
S.I. No. 281/2014 - European Union (End-of-Life Vehicles) Regulations, 2014
S.I. No. 282/2014 - European Union (Packaging) Regulations, 2014
S.I. No. 283/2014 - European Union (Batteries and Accumulators) Regulations, 2014
S.I. No. 349/2014 - European Union (Batteries and Accumulators) (Amendment) Regulations 2014.
S.I. No. 187/2014 - European Union (Animal By-Products) Regulations 2014.
S.I. No. 134/2014 - European Union (Good Agricultural Practice for Protection of Waters) (Amendment) Regulations 2014.
S.I. No. 148/2013 - European Union (Waste Incineration Plants & Waste Co-Incineration Plants) Regulation 2013
S.I. No. 137/2013 - Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations, 2013
S.I. No. 251/2013 - European Union (Household Food Waste and BioWaste) (Amendment) Regulations, 2013
S.I. No. 504/2013 - Waste Management (Prohibition of Waste Disposal by Burning) (Amendment) Regulations, 2013
S.I. No. 72/2013 - European Communities (Metallic Mercury Waste) Regulations 2013.
S.I. No. 513/2012 European Union (Restriction of Certain Hazardous Substances in Electrical and Electronic Equipment) Regulations, 2012
S.I. No. 564/2012 - European Union (Paints, Varnishes, Vehicle Refinishing Products and Activities) Regulations 2012
S.I. No. 324/2011 - European Communities (Shipment of Hazardous Waste exclusively within Ireland) Regulations, 2011
S.I. No. 323/2011 - European Communities (Waste Directive) (No. 2) Regulations, 2011
S.I. No. 126/2011 - European Communities (Waste Directive) Regulations, 2011
Act No. 20/2011 - Environment (Miscellaneous Provisions) Act 2011

National Waste Legislation
S.I. No. 32/2010 - Waste Management (Registration of Sewage Sludge Facility) Regulations, 2010
S.I. No. 350/2010 - Waste Management (Licensing) (Amendment) Regulations, 2010
S.I. No. 235/2010 - Persistent Organic Pollutant Regulations, 2010
S.I. No. 286/2009 - Waste Management (Prohibition of Waste Disposal by Burning) Regulations, 2009
S.I. No. 508/2009 - Waste Management (Food Waste) Regulations, 2009
S.I. No. 566/2009 - Waste Management (Management of Waste from the Extractive Industries) Regulations, 2009
S.I. No. 86/2008 - Waste Management (Facility Permit and Registration) (Amendment) Regulations, 2008
S.I. No. 87/2008 - Waste Management (Collection Permit) (Amendment) Regulations, 2008
S.I. No. 113/2008 - Waste Management (Registration of Brokers and Dealers) Regulations, 2008
S.I. No. 524/2008 - Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations, 2008
S.I. No. 62/2007 - Waste Management (Environmental Levy) (Plastic Bag) Order, 2007
S.I. No. 167/2007 - Waste Management (Environmental Levy) (Plastic Bag) (Amendment) (No. 2) Regulations, 2007
S.I. No. 419/2007 - Waste Management (Shipments of Waste) Regulations, 2007
S.I. No. 664/2007 - Waste Management (Tyres and Waste Tyres) Regulations, 2007
S.I. No. 820/2007 - Waste Management (Collection Permit) Regulations 2007
S.I. No. 821/2007 - Waste Management (Facility Permit and Registration) Regulations, 2007
S.I. No. 395/2004 - Waste Management (Licensing) Regulations, 2004
S.I. No. 478/2003 - Waste Management (Environment Fund) (Prescribed Payments) Regulations 2003
Act No. 27/2003 - Protection of the Environment Act 2003
S.I. No. 61/2003 - Waste Management (Packaging) Regulations, 2003
S.I. No. 267/2001 - Waste Management (Use of Sewage Sludge in Agriculture) (Amendment) Regulations, 2001
S.I. No. 341/2001 - Waste Management (Farm Plastics) Regulations, 2001
S.I. No. 605/2001 - Waste Management (Environmental Levy) (Plastic Bag) Regulations, 2001
Act No. 36/2001 - Waste Management (Amendment) Act, 2001
S.I. No. 73/2000 - Waste Management (Hazardous Waste) (Amendment) Regulations, 2000
S.I. No. 185/2000 - Waste Management (Licensing) Regulations, 2000
S.I. No. 146/1998 - Waste Management (Amendment of Waste Management Act, 1996) Regulations, 1998
S.I. No. 148/1998 - Waste Management (Use of Sewage Sludge in Agriculture) Regulations, 1998
S.I. No. 164/1998 - Waste Management (Miscellaneous Provisions) Regulations, 1998
S.I. No. 166/1998 - European Communities (Amendment of Waste Management Act, 1996) Regulations, 1998
S.I. No. 137/1997 - Waste Management (Planning) Regulations, 1997
S.I. No. 192/1996 - Waste Management Act, 1996 (Commencement) Order, 1996.
Act No. 10/1996 - Waste Management Act, 1996



EU Waste Legislation
Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC
Commission Implementing Regulation (EU) 2023/595 of 16 March 2023 establishing the form for the statement relating to the own resource based on non-recycled plastic packaging waste pursuant to Council Regulation (EU, Euratom) 2021/770
Commission Implementing Decision (EU) 2022/2427 of 6 December 2022 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions, for common waste gas management and treatment systems in the chemical sector (notified under document C(2022) 8788)
Commission Regulation (EU) 2022/520 of 31 March 2022 amending Regulation (EC) No 1418/2007 concerning the export for recovery of certain waste listed in Annex III or IIIA to Regulation (EC) No 1013/2006 of the European Parliament and of the Council to certain countries to which the OECD Decision on the control of transboundary movements of wastes does not apply
Commission Implementing Regulation (EU) 2022/91 of 21 January 2022 defining the criteria for determining that a ship produces reduced quantities of waste and manages its waste in a sustainable and environmentally sound manner in accordance with Directive (EU) 2019/883 of the European Parliament and of the Council
Commission Implementing Decision (EU) 2021/2267 of 17 December 2021 laying down the format for reporting data and information on the collected post-consumption waste of tobacco products with filters and of filters marketed for use in combination with tobacco products
Commission Implementing Decision (EU) 2021/2252 of 16 December 2021 amending Decision 94/741/EC concerning questionnaires for Member States reports on the implementation of certain Directives in the waste sector
Commission Regulation (EU) 2021/1840 of 20 October 2021 amending Regulation (EC) No 1418/2007 concerning the export for recovery of certain waste listed in Annex III or IIIA to Regulation (EC) No 1013/2006 of the European Parliament and of the Council to certain countries to which the OECD Decision on the control of transboundary movements of wastes does not apply
Commission Implementing Decision (EU) 2021/1752 of 1 October 2021 laying down rules for the application of Directive (EU) 2019/904 of the European Parliament and of the Council as regards the calculation, verification and reporting of data on the separate collection of waste single-use plastic beverage bottles
Commission Implementing Decision (EU) 2021/958 of 31 May 2021 laying down the format for reporting data and information on fishing gear placed on the market and waste fishing gear collected in Member States and the format for the quality check report in accordance with Articles 13(1)(d) and 13(2) of Directive (EU) 2019/904 of the European Parliament and of the Council
Council Regulation (EU, Euratom) 2021/770 of 30 April 2021 on the calculation of the own resource based on plastic packaging waste that is not recycled, on the methods and procedure for making available that own resource, on the measures to meet cash requirements, and on certain aspects of the own resource based on gross national income
Directive on Batteries and Accumulators (2013/56/EC).
Directive on Restriction of Use of Hazardous Substances in WEEE 2011/65/EU.
Commission Delegated Directive 2012/50/EU amending Annex 3 of EU Directive 2011/65/EU.
Commission Delegated Directive 2012/51/EU amending Annex 3 of EU Directive 2011/65/EU.
Directive (EU) 2017/2102 of the European Parliament and of the Council of 15 November 2017 amending Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment.
Directive on Waste Electrical and Electronic Equipment (WEEE) (2012/19/EU).

EU Waste Legislation
Commission Regulation (EU) No 493/2012 of 11 June 2012 laying down, pursuant to Directive 2006/66/EC of the European Parliament and of the Council, detailed rules regarding the calculation of recycling efficiencies of the recycling processes of waste batteries and accumulators.
Commission Regulation (EU) No 142/2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that directive.
Commission Regulation (EU) 757/2010 amending Regulation (EC) No 850/2004 of the European Parliament and of the Council on persistent organic pollutants as regards Annexes 1 and 3.
Directive on Industrial Emissions (2010/75/EU).
Commission Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002.
Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources.
Waste Framework Directive (2008/98/EC).
Directive 2018/851 of the European Parliament and the Council on amending Directive 2008/98/EC on waste
Directive on the Management of waste from the Extractive Industries (the Mining Waste Directive) (2006/21/EC).
Directive on Batteries and Accumulators (2006/66/EC).
Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste.
Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste, as amended.
Regulation (EU) No 1257/2013 of the European Parliament and of the Council of 20 November 2013 on ship recycling and amending Regulation (EC) No 1013/2006 and Directive 2009/16/EC.
Directive 2015/720 of the European Parliament and of the Council 2015 amending Directive 94/62/EC as regards reducing the consumption of lightweight plastic carrier bags
Commission Decision of 10 June 2005 (2005/438/EC) amending Annex 2 to Directive 2000/53/EC.
Council Decision of 20 September 2005 (2005/673/EC) amending Annex 2 to Directive 2000/53/EC.
Directive 2005/64/EC on the type-approval of motor vehicles with regard to their reusability, recyclability and recoverability.
Directive on Packaging and Packaging Waste (2004/12/EC) amending Directive 94/62/EC.
Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants.
Directive (2004/35/EC) on environmental liability with regard to the prevention and remedying of environmental damage.
Directive 2003/4/EC on public access to environmental information.
Directive (2003/35/EC) providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment, amending with regard to public participation and access to justice Council Directives 85/337/EEC and 96/61/EC.
Council decision (2003/33/EC) establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex 2 to directive 1999/31/EC.

EU Waste Legislation
Directive (2003/87/EC) establishing a scheme for greenhouse gas emission allowance trading within the community and amending Council Directive 96/61/EC.
Regulation (EC) No 166/2006 of the European Parliament and of the Council of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Council Directives 91/689/EEC and 96/61/EC.
Commission decision of 27 June 2002 (2002/525/EC) amending Annex 2 of Directive 2000/53/EC.
Directive (2001/42/EC) on the assessment of the effects of certain plans and programmes on the environment (strategic Environmental Assessment Directive).
Directive on End of Life Vehicles (ELV) (2000/53/EC).
Commission Directive 2013/28/EU amending Directive 2000/53/EC on End of Life Vehicles.
Directive (EU) 2018/849 of the European Parliament and of the Council of 30 May 2018 amending Directives 2000/53/EC on end-of-life vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on waste electrical and electronic equipment.
Commission Decision 2000/532/EC establishing a list of wastes.
Directive on the landfill of waste (1999/31/EC).
Directive 2018/850 of the European Parliament and of the Council amending Directive 1999/31/EC on the landfill of waste.
Directive 96/59/EC on the disposal of PCBs/PCTs.
Directive on Packaging and packaging waste (94/62/EC).
Directive 2018/852/EC 2018/852 of the European Parliament and of the Council amending Directive 94/62/EC on packaging and packaging waste.
Directive on the conservation of wild fauna and flora and of natural habitats (92/43/EEC).
Directive on sewage sludge (86/278/EEC).
Directive 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment.
Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the setting of eco-design requirements for energy-related products.
Regulation (EC) No 2150/2002 of the European Parliament and of the Council on waste statistics.
Council Directive of 21 May 1991 concerning urban wastewater treatment (91/271/EEC).
Regulation (EU) 2019/2144 of the European Parliament and of the Council of 27 November 2019 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/858 of the European Parliament and of the Council.
2009/337/EC: Commission Decision of 20 April 2009 on the definition of the criteria for the classification of waste facilities in accordance with Annex III of Directive 2006/21/EC of the European Parliament and of the Council concerning the management of waste from extractive industries.
2009/335/EC: Commission Decision of 20 April 2009 on technical guidelines for the establishment of the financial guarantee in accordance with Directive 2006/21/EC of the European Parliament and of the Council concerning the management of waste from extractive industries.
2009/360/EC: Commission Decision of 30 April 2009 completing the technical requirements for waste characterisation laid down by Directive 2006/21/EC of the European Parliament and of the Council on the management of waste from extractive industries.

EU Waste Legislation
2009/358/EC: Commission Decision of 29 April 2009 on the harmonisation, the regular transmission of the information and the questionnaire referred to in Articles 22(1)(a) and 18 of Directive 2006/21/EC of the European Parliament and of the Council on the management of waste from extractive industries.
Commission Implementing Decision (EU) 2020/248 of 21 February 2020 laying down technical guidelines for inspections in accordance with Article 17 of Directive 2006/21/EC of the European Parliament and of the Council.
Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC.
97/622/EC: Commission Decision of 27 May 1997 concerning questionnaires for Member States reports on the implementation of certain Directives in the waste sector (implementation of Council Directive 91/692/EEC).
Commission Implementing Decision (EU) 2019/665 of 17 April 2019 amending Decision 2005/270/EC establishing the formats relating to the database system pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste.
Commission Implementing Decision (EU) 2018/896 of 19 June 2018 laying down the methodology for the calculation of the annual consumption of lightweight plastic carrier bags and amending Decision 2005/270/EC.
2009/292/EC: Commission Decision of 24 March 2009 establishing the conditions for a derogation for plastic crates and plastic pallets in relation to the heavy metal concentration levels established in Directive 94/62/EC of the European Parliament and of the Council on packaging and packaging waste.
2001/171/EC: Commission Decision of 19 February 2001 establishing the conditions for a derogation for glass packaging in relation to the heavy metal concentration levels established in Directive 94/62/EC on packaging and packaging waste.
Commission Delegated Directive (EU) 2015/863 of 31 March 2015 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances.
Regulation (EU) 2019/1010 of the European Parliament and of the Council of 5 June 2019 on the alignment of reporting obligations in the field of legislation related to the environment, and amending Regulations (EC) No 166/2006 and (EU) No 995/2010 of the European Parliament and of the Council, Directives 2002/49/EC, 2004/35/EC, 2007/2/EC, 2009/147/EC and 2010/63/EU of the European Parliament and of the Council, Council Regulations (EC) No 338/97 and (EC) No 2173/2005, and Council Directive 86/278/EEC.
Decision (EU) 2018/853 of the European Parliament and of the Council of 30 May 2018 amending Regulation (EU) No 1257/2013 and Directives 94/63/EC and 2009/31/EC of the European Parliament and of the Council and Council Directives 86/278/EEC and 87/217/EEC as regards procedural rules in the field of environmental reporting and repealing Council Directive 91/692/EEC.
Council Directive 91/271/EEC of 21 May 1991 concerning urban waste-water treatment.
Commission Implementing Decision (EU) 2016/2325 of 19 December 2016 on the format of the certificate on the inventory of hazardous materials issued in accordance with Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling.
Commission Implementing Decision (EU) 2016/2321 of 19 December 2016 on the format of the ready for recycling certificate issued in accordance with Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling.
Commission Implementing Decision (EU) 2016/2324 of 19 December 2016 on the format of the report of planned start of ship recycling required under Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling.



### EU Waste Legislation

Commission Implementing Decision (EU) 2016/2322 of 19 December 2016 on the format of the statement of completion of ship recycling required under Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling.

Commission Regulation (EC) No 1418/2007 of 29 November 2007 concerning the export for recovery of certain waste listed in Annex III or IIIA to Regulation (EC) No 1013/2006 of the European Parliament and of the Council to certain countries to which the OECD Decision on the control of transboundary movements of wastes does not apply.

Commission Implementing Regulation (EU) 2016/1245 of 28 July 2016 setting out a preliminary correlation table between codes of the Combined Nomenclature provided for in Council Regulation (EEC) No 2658/87 and entries of waste listed in Annexes III, IV and V to Regulation (EC) No 1013/2006 of the European Parliament and of the Council on shipments of waste.

Commission Delegated Regulation (EU) 2020/2174 of 19 October 2020 amending Annexes IC, III, IIIA, IV, V, VII and VIII to Regulation (EC) No 1013/2006 of the European Parliament and of the Council on shipments of waste.

Commission Implementing Regulation (EU) 2017/699 of 18 April 2017 establishing a common methodology for the calculation of the weight of electrical and electronic equipment (EEE) placed on the market of each Member State and a common methodology for the calculation of the quantity of waste electrical and electronic equipment (WEEE) generated by weight in each Member State.

Commission Implementing Regulation (EU) 2019/290 of 19 February 2019 establishing the format for registration and reporting of producers of electrical and electronic equipment to the register.

Commission Implementing Decision (EU) 2019/2193 of 17 December 2019 laying down rules for the calculation, verification and reporting of data and establishing data formats for the purposes of Directive 2012/19/EU of the European Parliament and of the Council on waste electrical and electronic equipment (WEEE).



## APPENDIX 6

### Inventory of Local Authority Authorised Waste Sites



## Local Authority Authorised Waste Facilities

Authorisation No.	Name of Facility	Local Authority
COR-CW-13-2	Environmental Compaction Systems (ECS) Limited	Carlow County Council
WFP-CW-10-2-02	P.J. Coleman & Sons	Carlow County Council
COR-CW-16-03-01	Environmental Compaction Systems	Carlow County Council
WFP-CW-16-0001-01	Lillian Flynn	Carlow County Council
WFP-CW-16-3	Conway Concrete Ltd	Carlow County Council
COR-CW-16-4	Smith Groundworks and Civil Engineering Ltd	Carlow County Council
WFP-CW-17-2	Smith Groundworks and Civil Engineering Ltd.	Carlow County Council
WFP-CW-16-4	Kilcarrig Quarries Ltd	Carlow County Council
WFP-CW-17-1	Brian Kelly	Carlow County Council
WFP-CW-17-005-02	Kilcarrig Quarries Ltd	Carlow County Council
WFP-CW-18-12-01	James O'Connor	Carlow County Council
WFP-CW-17-004-01	Bill Flynn	Carlow County Council
COR-CW-18-05-01	James & Mary Daly	Carlow County Council
WFP-CW-18-005-03	Conway Concrete	Carlow County Council
WFP-CW-18-010-02	Bioenergy Power Systems	Carlow County Council
COR-CW-19-05-01	Walsh Quarries Ltd	Carlow County Council
SSF/19-01	ENVA Ireland Ltd	Carlow County Council
COR-CW-19-05-02	Kilcarrig Quarries Ltd	Carlow County Council
S.S.F. 2019-02	Quinn's of Baltinglass Ltd.	Carlow County Council
COR-SSF-CN-16-001	Enva Ireland Limited	Cavan County Council
WFP-CN-16-0002-01	Rexton Car Parts Limited	Cavan County Council
WFP-CN-16-0003-01	Eurobreakers Parts Limited	Cavan County Council
WFP-CN-16-0005-01	Martin Cahill Limited	Cavan County Council
WFP-CN-16-0004-01	Victor Fegan	Cavan County Council
WFP-CN-16-0001-01(1)	McBreen Environmental Drain Services Ltd	Cavan County Council
COR-CN-17-0004-01	Wilton Waste Recycling Limited	Cavan County Council
COR-CN-17-0003-01	P&S Civil Works Limited	Cavan County Council
COR-SSF-CN-17-001	McBreen Environmental Services Ltd	Cavan County Council
WFP-CN-18-0002-01	Gerry and Rita Sweeney	Cavan County Council
COR-CN-18-0002-01	Datum Contracts Limited	Cavan County Council
COR-CN-19-0001-01	Jupiter Transport Limited	Cavan County Council
COR-CN-19-0002-01	Gerry Lambe	Cavan County Council
COR-CN-19-0003-01	Karl Dolan	Cavan County Council
WFP-CN-20-0001-01	Wilton Waste Recycling Ltd	Cavan County Council
WFP-CN-20-0002-01	Polyfab Plastics Limited	Cavan County Council
WFP-CN-20-0003-01	Ronan Smith	Cavan County Council
WFP-CN-20-0004-01	Pallet Supplies Ltd	Cavan County Council

Authorisation No.	Name of Facility	Local Authority
COR-CN-18-0002-01	Datum Contracts Limited	Cavan County Council
COR-CN-19-0001-01	Jupiter Transport Limited	Cavan County Council
COR-CN-19-0002-01	Gerry Lambe	Cavan County Council
COR-CN-19-0003-01	Karl Dolan	Cavan County Council
WFP-CN-20-0001-01	Wilton Waste Recycling Ltd	Cavan County Council
WFP-CN-20-0002-01	Polyfab Plastics Limited	Cavan County Council
WFP-CN-20-0003-01	Ronan Smith	Cavan County Council
WFP-CN-20-0004-01	Pallet Supplies Ltd	Cavan County Council
COR-CN-20-0001-01	Sean Kelly Quarry Ltd.	Cavan County Council
WFP-CN-20-0005-01	Felix Gormley Used Metal Disposals Ltd	Cavan County Council
COR-CN-21-0001-01	Kieran King	Cavan County Council
WFP-CN-21-0001-01	Eco Tyre Tread Solutions Ltd	Cavan County Council
COR-CN-21-0002-01	Laurence Keenan	Cavan County Council
COR-CN-21-0003-01	Daniel Fay	Cavan County Council
WFP-CN-21-0002-01	Lakeland Dairies Co-operative Society Limited	Cavan County Council
WFP-CE-11-0001-02	Arch Recycling Co. Ltd.	Clare County Council
COR-CE-16-0001-01	Kieran Kelly Haulage Ltd	Clare County Council
WFP-CE-11-0003-02	Kevin Marsh	Clare County Council
WFP-CE-17-0001-01	Thomas Buckley	Clare County Council
COR-CE-12-0002-02	Michael King	Clare County Council
COR-CE-17-0005-01	Tulla Athletic Club	Clare County Council
COR-CE-12-0001-02	Mick Sexton	Clare County Council
COR-CE-17-0002-01	Kelly RAC	Clare County Council
WFP-CE-17-0002-01	Clare Drains Environmental Ltd	Clare County Council
WFP-CE-08-0002-03	Clare Waste & Recycling Co. Ltd	Clare County Council
COR-CE-18-0004-01	Michael Johnston	Clare County Council
WFP-CE-08-0003-03	Clean (Ir) Refuse & Recycling Company	Clare County Council
COR-CE-18-0005-01	John White	Clare County Council
WFP-CE-18-0002-01	Roadstone Ltd	Clare County Council
COR-CE-15-0005-02	Eddie Russell	Clare County Council
COR-CE-18-0006-01	Con O'Donoghue	Clare County Council
WFP-CE-14-0001-02	IFF Plastics Ltd	Clare County Council
WFP-CE-12-0003-02	Corofin Car Dismantlers Ltd	Clare County Council
COR-CE-19-0001-01	Tom Marsh	Clare County Council
WFP-CE-19-0001-01	Jim Bolton Sand and Gravel Ltd	Clare County Council
COR-CE-19-0003-01	Western Excavations & Ground Works Ltd	Clare County Council
COR-CE-19-0002-01	Gerard Ryan	Clare County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-CE-12-0002-02	Thomas Crowley	Clare County Council
COR-CE-19-0005-01	Con O'Donoghue	Clare County Council
COR-CE-14-0005-02	Bobby O'Connell & Sons Ltd	Clare County Council
WFP-CE-19-0003-01	Shannon Abrasives Ltd	Clare County Council
COR-CE-16-0003-02	Francis Queally	Clare County Council
WFP-CE-19-0002-01	Kieran Kelly Haulage Ltd	Clare County Council
COR-CE-19-0004-01	Kieran Kelly Haulage Ltd	Clare County Council
COR-CE-19-0006-01	Thomas Crowley	Clare County Council
COR-CE-20-0002-01	Justin O'Grady	Clare County Council
COR-CE-20-0001-01	James Lynch	Clare County Council
COR-CE-20-0003-01	Clare Waste & Recycling Co. Ltd	Clare County Council
COR-CE-20-0004-01	Patrick Carey	Clare County Council
WFP-CE-15-0002-02	Roadstone Ltd.	Clare County Council
WFP-CE-10-0002-03	Eamon Conway	Clare County Council
WFP-CE-20-0002-01	Lymar Contracts Ltd.	Clare County Council
COR-CE-21-0001-01	Joe McMahon	Clare County Council
WFP-CE-11-0002-03	Tullagower Quarries Ltd.	Clare County Council
COR-CE-21-0002-01	Kieran Kelly Haulage Ltd.	Clare County Council
COR-CE-21-0003-01	Western Excavations and Groundworks Ltd.	Clare County Council
COR-CE-21-0004-01	Michael King	Clare County Council
COR-CE-21-0007-01	Gerard Burke	Clare County Council
COR-CE-21-0008-01	Kieran Kelly Haulage Ltd.	Clare County Council
COR-CE-21-0009-01	Kieran Kelly Haulage Ltd	Clare County Council
COR-CE-21-0010-01	Kieran Kelly Haulage Ltd.	Clare County Council
WFP-CC-02/2016	Ocon Chemicals Limited	Cork City Council
WFP-CC-01/2016	OCS One Complete Solution Ltd	Cork City Council
WFP-CC-14/2016	IGM Re-Gran Ltd.	Cork City Council
WFP-CK-11-0107-03	Keohane Car Parts Limited	Cork City Council
COR-CK-17-0104-01	Rostova Limited	Cork City Council
COR-CC-05/2017	Refrigeration Distributors Limited	Cork City Council
COR-CK-17-0111-01	RSL Ireland Ltd	Cork City Council
COR-CC-06/2018	MMD Construction Ltd	Cork City Council
COR-CC-07/2018	Kollect on Demand Ltd	Cork City Council
WFP-CC-17/2018	Oakwood Leisure Ltd	Cork City Council
WFP-CC-16/2018	QTLS Limited	Cork City Council
COR-CC-18-2018	Fahey Construction BCE Limited	Cork City Council
COR-CC-20-2019	Coffey Construction (I) Ltd	Cork City Council

Authorisation No.	Name of Facility	Local Authority
WFP-CK-09-0015-03	Cork Hygiene Limited	Cork City Council
WFP-CC-22-2019	Cork Metal Company Ltd	Cork City Council
WFP-CC-24/2019	Martin O'Callaghan Ltd	Cork City Council
WFP-CC-28/2019	Pouladuff Dismantlers Cork Ltd	Cork City Council
WFP-CC-25-2019	National Recycling Company Ltd	Cork City Council
WFP-CC-26-2019	Elmwick Ltd	Cork City Council
WFP-CC-27-2019	Cellulose Insulation Ltd	Cork City Council
COR-CC-22-2019	Greenvally Transport & Land Reclamation Ltd	Cork City Council
WFP-CC-30-2020	G Keohane Pallet Recycling Ltd	Cork City Council
WFP-CC-31-2020	Cork Recycling Company Ltd	Cork City Council
WFP-CC-34-2020	Lee Metal Company Limited	Cork City Council
WFP-CC-35-2020	CND Recycling Ltd	Cork City Council
WFP-CC-32-2020-01	Rehab Enterprises Limited	Cork City Council
WFP-CC-37-2020	Wisetek Solutions Ltd	Cork City Council
WFP-CC-39-2020	Aidan Buckley	Cork City Council
WFP-CC-38-2020	Starrus Property Holdings Ltd	Cork City Council
WFP-CC-36-2020	Bedwise Ltd	Cork City Council
COR-CC-21-2019	Tim O'Shea	Cork City Council
WFP-CC-29-2019-04	Instant Waste Disposal Ltd	Cork City Council
COR-CC-15-2018-03	O'Kelly Brothers Civil Engineering Company Limited - Mobile Plant	Cork City Council
WFP-CC-33-2020-01	Gerlan Cars and Parts Limited	Cork City Council
WFP-CC-42-2021	Ocon Chemicals Ltd	Cork City Council
COR-CK-15-0087-01	Mallow Contracts Ltd	Cork County Council
WFP-CK-15-0149-01	Pat O'Driscoll Plant Hire Ltd	Cork County Council
WFP-CK-15-0152-01	Greenvally Transport & Plant Hire Limited	Cork County Council
WFP-CK-13-0127-02	Eirebloc Limited	Cork County Council
WFP-CK-15-0157-01	Mallow Contracts Ltd	Cork County Council
WFP-CK-11-0083-02	Frank Smyth & Sons Ltd	Cork County Council
WFP-CK-11-0092-02	Frylite (Ireland) Ltd.	Cork County Council
WFP-CK-15-0154-01	Roadstone Limited	Cork County Council
WFP-CK-15-0155-01	Roadstone Limited	Cork County Council
COR-CK-16-0093-01	Irish Landfill Services Limited	Cork County Council
WFP-CK-15-0151-01	Ray Fitzgerald	Cork County Council
COR-CK-11-0036-02	F & M Hurley Plant Hire (Schull) Ltd	Cork County Council
WFP-CK-10-0059-03	Pat Kelleher Rubber Limited	Cork County Council
WFP-CK-16-0160-01	Keohane Readymix Limited	Cork County Council
WFP-CK-10-0069-02	Thomas Rigney, Micheal Rigney, Joan Rigney & Paul Rigney	Cork County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
COR-CK-16-0098-01	Department of Agriculture Food and Marine	Cork County Council
WFP-CK-10-0066-03	Munster Polymers Ltd	Cork County Council
WFP-CK-11-0108-03	Godfrey Kirby	Cork County Council
WFP-CK-16-0161-01	Cameron Kiernan Landscaping Ltd	Cork County Council
COR-CK-17-0101-01	Bantry Skip Hire Ltd.	Cork County Council
WFP-CK-10-0071-03	Tanner Brothers Ltd.	Cork County Council
WFP-CK-15-0146-01	Sean Harnedy	Cork County Council
WFP-CK-11-0100-03	Shane O'Connell	Cork County Council
WFP-CK-12-0113-02	Pat O'Driscoll Plant Hire Ltd	Cork County Council
WFP-CK-17-0171-01	Kevin McCarthy Haulage Limited	Cork County Council
WFP-CK-17-0172-01	David Crowley	Cork County Council
WFP-CK-16-0159-01	R & R Farm Limited	Cork County Council
COR-CK-17-0106-01	Eamonn Power	Cork County Council
WFP-CK-17-0173-01	Martin O'Regan Enterprises Ltd	Cork County Council
WFP-CK-12-0115-02	Finbarr Coffey	Cork County Council
WFP-CK-16-0167-01	John Tyner	Cork County Council
WFP-CK-11-0111-02	Martin O'Sullivan	Cork County Council
WFP-CK-12-0120-02	Bantry Skip Hire Ltd	Cork County Council
WFP-CK-11-0094-04	O'Brien Skip Hire Limited	Cork County Council
WFP-CK-17-0177-01	Denis P Barrett and Sheila Barrett and S & B Farms Ltd	Cork County Council
WFP-CK-17-0178-01	Conhor Landfill Limited	Cork County Council
COR-CK-18-0113-01	Barrymore Waste Recovery	Cork County Council
WFP-CK-18-0181-01	Keohane Car Parts Ltd	Cork County Council
COR-CK-12-0045-02	Enva Organics Ltd	Cork County Council
WFP-CK-18-0180-01	Mallow Contracts Limited	Cork County Council
COR-CK-18-0115-01	Seán Ó Luasa	Cork County Council
WFP-CK-13-0126-03	O'Flynn Construction Co. Unlimited Company	Cork County Council
COR-CK-18-0118-01	Greenvalley Plant Hire & Land Reclamation Ltd	Cork County Council
COR-CK-13-0060-02	Enva Organics Ltd	Cork County Council
WFP-CK-17-0174-01	Greenvalley Transport & Plant Hire Limited	Cork County Council
WFP-CK-16-0166-01	Virgil Horgan (Kinsale Rugby Club)	Cork County Council
WFP-CK-17-0179-01	Ciaran Ryan Plant Hire Ltd	Cork County Council
WFP-CK-18-0182-01	Axon Plant Sales Ltd	Cork County Council
WFP-CK-11-0112-02	Bantry Skip Hire Ltd	Cork County Council
WFP-CK-18-0188-01	Greenvalley Transport & Land Reclamation	Cork County Council
WFP-CK-18-0186-01	Greenvalley Transport & Land Reclamation Ltd	Cork County Council
WFP-CK-18-0185-01	Ladysbridge Aggregates Ltd	Cork County Council
COR-CK-14-0071-02	Michael Harrington Plant Hire (Beara) Ltd	Cork County Council

Authorisation No.	Name of Facility	Local Authority
WFP-CK-09-0008-03	John O'Connor	Cork County Council
COR-CK-19-0126-01	Enva Organics Ltd	Cork County Council
COR-CK-19-0127-01	Tony O'Mahony Agri & Plant Hire Ltd	Cork County Council
WFP-CK-18-0189-01	Namaul Holdings Ltd	Cork County Council
WFP-CK-19-0193-01	Navada Transport Services Ltd	Cork County Council
WFP-CK-19-0194-01	Courtmacsherry Machinery Ltd	Cork County Council
WFP-CK-19-0197-01	Michael O'Neill	Cork County Council
WFP-CK-19-0195-01	Ward & Burke Construction Ltd	Cork County Council
WFP-CK-19-0198-01	Christy O'Leary Plant Hire Ltd	Cork County Council
WFP-CK-11-0099-03	Crossmore Transport Ltd	Cork County Council
COR-CK-19-0129-01	John Kingston	Cork County Council
WFP-CK-17-0170-01-T	Blueprint Property Development Ltd	Cork County Council
WFP-CK-09-0020-05	John A O'Sullivan	Cork County Council
WFP-CK-19-0201-01	Keohane Readymix Ltd	Cork County Council
COR-CK-14-0082-02	Moloney Environmental Ltd	Cork County Council
WFP-CK-19-0199-01	John O'Flynn	Cork County Council
WFP-CK-19-0202-01	Sorensen Civil Engineering Ltd	Cork County Council
WFP-CK-10-0057-04	Junction Transport Ltd	Cork County Council
WFP-CK-20-0204-01	Greenvalley Transport & Land Reclamation Ltd.	Cork County Council
COR-CK-15-0088-02	John O'Brien	Cork County Council
WFP-CK-14-0137-02	Conhor Construction Ltd	Cork County Council
WFP-CK-09-0018-04	CTO Environmental Solutions Ltd	Cork County Council
WFP-CK-20-0203-01	Richard & Denis Carroll Plant Ltd	Cork County Council
WFP-CK-20-0205-01	Mallow Contracts Limited	Cork County Council
WFP-CK-09-0044-03	AOC Services Ltd	Cork County Council
WFP-CK-09-0014-05	Port of Cork Company	Cork County Council
WFP-CK-09-0017-04	Barry Metal Recycling Ltd	Cork County Council
COR-CK-20-0131-01	Pat McSweeney	Cork County Council
WFP-CK-09-0039-03	Southern Truck Recycling Company Ltd.	Cork County Council
WFP-CK-09-0032-04	Abbeyross Manufacturing Company Limited t/a Munster Waste Management	Cork County Council
WFP-CK-15-0147-02	McSweeney Bros Quarries Ltd.	Cork County Council
COR-CK-10-0029-03	Chris Barry Plant Hire Ltd	Cork County Council
WFP-CK-09-0037-03	William Swayne & Killian Swayne	Cork County Council
WFP-CK-10-0054-03	Donal Murphy	Cork County Council
WFP-CK-20-0206-01	Greenvalley Transport & Land Reclamation Ltd	Cork County Council
WFP-CK-10-0068-03	Roadstone Limited	Cork County Council
WFP-CK-18-0184-01	John Shanahan	Cork County Council
WFP-CK-10-0078-03	Greenzone Ltd	Cork County Council



## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
COR-CK-20-0132-01	Michael Harrington Plant Hire (Beara) Ltd	Cork County Council
WFP-CK-15-0153-02	Irohau Limited	Cork County Council
WFP-CK-20-0207-01	Midleton Skip Hire Ltd	Cork County Council
WFP-CK-20-0210-01	Greenvalley Transport & Land Reclamation Ltd	Cork County Council
WFP-CK-11-0091-05	Joe O'Sullivan	Cork County Council
WFP-CK-12-0122-03	Denis Cashman	Cork County Council
WFP-CK-20-0211-01	Ciaran Ryan Plant Hire Ltd	Cork County Council
WFP-CK-20-0212-01	Mallow Contracts Ltd	Cork County Council
WFP-CK-21-0214-01	Noel O'Shea Farm Ltd	Cork County Council
WFP-CK-21-0215-01	Ed Barry Ltd	Cork County Council
WFP-CK-10-0060-04	Green Dragon Recycling Limited	Cork County Council
WFP-CK-21-0216-01	Jim O'Regan	Cork County Council
COR-CK-16-0095-02	Tomas (Thomas) Mullins aka Thomas Mullins (Junior)	Cork County Council
WFP-CK-11-0084-04	Auto Dismantlers Limited	Cork County Council
WFP-CK-16-0158-02	OD Haulage Ltd	Cork County Council
WFP-CK-11-0090-03	Tim Fitzpatrick	Cork County Council
WFP-CK-21-0218-01	Mallow Contracts Limited	Cork County Council
WFP-CK-20-0213-01	Denis Quinn Plant Hire Ltd	Cork County Council
WFP-CK-18-0190-01 (T)	Ciaran Ryan Plant Hire Ltd	Cork County Council
WFP-DL-10-022-01	Carl McDaid Recycling	Donegal County Council
WFP-DL-11-0019-01	D&M Environmental Services Ltd	Donegal County Council
WFP-DL-14-015-01	Hubert McLaughlin & Sons Ltd	Donegal County Council
WFP-DL-12-010-03	Paul McLaughlin	Donegal County Council
WFP-DL-13-028-03	Shaun McBride	Donegal County Council
WFP-DL-12-080-01	Charlie McLaughlin	Donegal County Council
WFP-DL-12-020-01	Hugh Barr	Donegal County Council
WFP-DL-15-002-01	Laghey Waste Ltd	Donegal County Council
WFP-DL-15-027-01	Pauric Meehan	Donegal County Council
WFP-DL-15-061-01	Green Vehicle Recycling Ltd.	Donegal County Council
COR-DL-16-060-01	McCallion Group Ltd	Donegal County Council

Authorisation No.	Name of Facility	Local Authority
WFP-DL-16-125-01	ND Ford Breakers	Donegal County Council
WFP-DL-15-124-01	Michael McLaughlin	Donegal County Council
COR-DL-16-057-01	Carthy's Contractors Ltd	Donegal County Council
WFP-DL-16-069-03	Martin O'Donnell	Donegal County Council
WFP-DL-16-009-04	Shaun Molloy & Sons Ltd	Donegal County Council
WFP-DL-16-100-02	OCS One Complete Solution Ltd	Donegal County Council
WFP-DL-16-008-04	Raymond McDaid	Donegal County Council
WFP-DL-17-004-05	Enviro Grind Ltd.	Donegal County Council
COR-DL-16-062-01	Dorrian Construction Ltd	Donegal County Council
COR-DL-17-032-02	Bryson Recycling Ltd (Stranolar)	Donegal County Council
COR-DL-17-030-02	Bryson Recycling Ltd	Donegal County Council
COR-DL-17-031-02	Bryson Recycling Ltd (Milford)	Donegal County Council
WFP-DL-16-0119-03	Ulster Environmental Management Services Ltd	Donegal County Council
WFP-DL-16-127-01	James Coll	Donegal County Council
WFP-DL-16-0117-01	Kenneth Vance	Donegal County Council
WFP-DL-18-130-01	Ian Lamberton	Donegal County Council
WFP-DL-16-018-04	JML Recycling Ltd	Donegal County Council
WFP-DL-16-099-02	United Shredding Ltd	Donegal County Council
WFP-DL-18-071-03	William Albert Galbraith	Donegal County Council
WFP-DL-17-129-01	The Glen Stone Company Ltd	Donegal County Council
COR-DL-18-070-01	The Wild Ireland Project Ltd	Donegal County Council
WFP-DL-14-029-01	Sharkey Waste Recycling Ltd	Donegal County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
COR-DL-17-063-01	James Boyle	Donegal County Council
COR-DL-18-046-02	Bryson Recycling Ltd (Carndonagh)	Donegal County Council
COR-DL-18-047-02	Bryson Recycling Ltd (Dungloe)	Donegal County Council
COR-DL-18-048-02	Bryson Recycling Ltd (Laghey)	Donegal County Council
WFP-DL-18-081-03	Jonathan Edwards	Donegal County Council
WFP-DL-19-132-01	Shaun Molloy & Sons Ltd	Donegal County Council
COR-DL-17-066-01	Toland Plant Ltd	Donegal County Council
WFP-DL-19-114-03	Patrick Logan & Sons Ltd	Donegal County Council
WFP-DL-19-131-01	Moyle Plant Ltd	Donegal County Council
WFP-DL-18-022-02	Carl McDaid	Donegal County Council
COR-DL-19-072-01	Michael Donaghey	Donegal County Council
WFP-DL-20-123-02	The Hammond Lane Metal Company Ltd	Donegal County Council
WFP-DL-18-122-02	Patsy Meehan	Donegal County Council
WFP-DL-19-043-03	Daniel Lynch	Donegal County Council
WFP-DL-21-080-03	Charlie McLaughlin	Donegal County Council
COR-DL-17-065-01	Glan Agua Ltd.	Donegal County Council
WFP-DL-20-006-04	Sidney McDaid	Donegal County Council
WFP-DL-19-042-03	Moyle Plant Ltd	Donegal County Council
WFP-DC-11-0027-02	Tom Murphy Recovery & Towing Services Limited	Dublin City Council
WFP-DC-11-0025-02	Rehab Enterprises Ltd	Dublin City Council
COR-DC-11-0003-02	Jengus Limited	Dublin City Council
WFP-DC-11-0026-02	Edward O'Reilly	Dublin City Council
WFP-DC-10-0021-03	Padraig Thornton Waste Disposal Ltd	Dublin City Council
WFP-DC-17-0038-01	Hegarty Demolition Ltd - Mobile Plant	Dublin City Council
WFP-DC-17-0041-01	John J Duffy Demolition & Civil Contractors - Mobile Plant	Dublin City Council

Authorisation No.	Name of Facility	Local Authority
WFP-DC-17-0042-01	Tony Kirwan Civil Engineering Ltd - Mobile Plant	Dublin City Council
WFP-DC-17-0043-01	Barnmore Demolition & Civil Engineering Ltd - Mobile Plant	Dublin City Council
WFP-DC-18-0046-01	Breffni Building & Civil Engineering Limited - Mobile Plant	Dublin City Council
WFP-DC-11-0028-02	Mitchell Taylor (Exports) Limited	Dublin City Council
WFP-DC-18-0045-01	J Ryan Haulage Limited - Mobile Plant	Dublin City Council
COR-DC-18-0005-01	Monami Construction Ltd	Dublin City Council
WFP-DC-10-0020-02	Everyday Waste & Skiphire	Dublin City Council
WFP-DC-10-0018-02	Summerhill Spares Limited	Dublin City Council
WFP-DC-17-0037-01	John Tinnelly & Sons Ltd - Mobile Plant	Dublin City Council
WFP-DC-17-0040-01	Shannon Valley Plant Hire Ltd - Mobile Plant	Dublin City Council
WFP-DC-19-0048-01	Sunflower Recycling Limited	Dublin City Council
WFP-DC-19-0049-01	McManus Crushing Ltd - Mobile Plant	Dublin City Council
WFP-DC-18-0047-01	L & M Keating Limited - Mobile Plant	Dublin City Council
WFP-DC-09-0008-03	Martin Services (Industrial) Ltd	Dublin City Council
WFP-DC-08-0002-03	G & T McGoverns Ltd	Dublin City Council
WFP-DC-19-0050-01	O'Kelly Brothers Civil Engineering Co Ltd - Mobile Plant	Dublin City Council
WFP-DC-20-0051-01	Everyday Hire Limited	Dublin City Council
WFP-DC-20-0052-01	Dulqamoni Auto	Dublin City Council
WFP-DC-20-0054-01	Shanowen Plant Hire Ltd - Mobile Plant	Dublin City Council
WFP-DC-20-0053-01	Loftus Demolition & Recycling Ltd - Mobile PLant	Dublin City Council
WFP-DC-12-0032-03	Eco Mattress Recycling Limited	Dublin City Council
WFP-DC-20-0055-01	Padraig Thornton Waste Disposal Ltd	Dublin City Council
WFP-DC-09-0015-03	Chevron Environmental Ltd	Dublin City Council
WFP-DC-11-0023-03	Padraig Thornton Waste Disposal Ltd (PTWDL)	Dublin City Council
COR-DC-21-0010-01	Fridge Spares Wholesale Ltd	Dublin City Council
WFP-DC-11-0022-03	Dawnlane Limited	Dublin City Council
WFP-DLR-16-001	GreenKing Composting Limited	Dun Laoghaire-Rathdown County Council
WFP-DLR-21-001-01	ESB Depot Leopardstown	Dun Laoghaire-Rathdown County Council
WFP-FG-11-0002-01	OCS One Complete Solution Ltd	Fingal County Council
WFP-FG-15-0005-01	Fergus Butterly	Fingal County Council
COR-FG-17-0001-01	Rudder Transport Ltd	Fingal County Council
WFP-FG-17-0004-01	Blancomet Recycling IE Ltd	Fingal County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-FG-17-0003-01	Oakwood Leisure Ltd	Fingal County Council
WFP-FG-18-0001-01	Gannons City Recovery and Recycling Services Ltd	Fingal County Council
WFP-FG-18-0002-01	O'Reilly Recycling Ltd	Fingal County Council
WFP-FG-15-0001-03	M50 Skip Hire and Recycling Ltd	Fingal County Council
WFP-FG-19-0001-01	Padraic McMahon	Fingal County Council
WFP-FG-10-0001-03	Industrial, Agri & Engineering Salvage Ltd	Fingal County Council
WFP-FG-08-0002-05	Cloughwater Plastics Ireland Limited	Fingal County Council
WFP-FG-19-0003-01	Glv Bay Lane Ltd	Fingal County Council
WFP-FG-13-0001-03	Johmick Ltd	Fingal County Council
WFP-FG-18-0003-02	Department of Agriculture Food and the Marine	Fingal County Council
WFP-FG-20-0002-01	Nypro Ltd	Fingal County Council
WFP-FG-20-0003-01	Frylite Dublin Ltd	Fingal County Council
WFP-FG-15-0006-02	Cyclone Couriers Ltd	Fingal County Council
WFP-FG-13-0002-03	St. Margaret's Recycling & Transfer Centre Limited	Fingal County Council
WFP-FG-15-0004-02	TD Euro Scrap Metal Ltd	Fingal County Council
WFP-FG-17-0001-04	Padraig Thornton Waste Disposal Ltd	Fingal County Council
WFP-FG-16-0001-02	ITRenew ITAD Ireland Ltd	Fingal County Council
COR-FG-21-0001-01	GMC Utilities Group Ltd	Fingal County Council
WFP-GC-16-0001-01	Galway Vehicle Recycling Centre Ltd	Galway City Council
WFP-GC-17-0001-01	Galway Traveller Movement Ltd.	Galway City Council
WFP-GC-17-0002-01	Galway Harbour Company	Galway City Council
COR-GC-21-0001-01	BIGbin Waste Tech Ltd	Galway City Council
WFP-G-15-0004-01	Headford Road Car Dismantlers Ltd	Galway County Council
WFP-G-17-0002-01	Masonbrook Motors Ireland Ltd	Galway County Council
WFP-G-17-0004-01	Wheeley Environmental Refuse Services Ltd	Galway County Council
WFP-G-17-0005-01	Tuam Engineering (Hynes) Ltd	Galway County Council
WFP-G-18-0001-01	Walsh Waste Ltd	Galway County Council
WFP-G-16-0001-01	Vincent Cannon Co Ltd	Galway County Council
COR-G-17-0001-02	Rahoon/Newcastle GAA Club	Galway County Council
COR-G-18-0001-01	Clifden & District Community Council	Galway County Council
COR-G-18-0002-01	Johnston Plant Hire Ltd	Galway County Council
WFP-G-16-0004-02	Rentokil Initial Ltd	Galway County Council
WFP-G-19-0001-01	Quitmann O'Neill Packaging Ltd	Galway County Council
WFP-G-16-0005-02	Frank Mortimer Ltd	Galway County Council
WFP-G-19-0002-01	Walsh Waste Ltd	Galway County Council
COR-G-19-0001-01	Sean & Tommy McMahon	Galway County Council
COR-G-19-0003-01	Rehab Enterprises Ltd	Galway County Council
WFP-G-20-0002-01	Connacht Tipping Services Ltd	Galway County Council

Authorisation No.	Name of Facility	Local Authority
WFP-G-17-0006-02	Connacht 4 x 4 Spares	Galway County Council
WFP-G-20-0004-01	Statcroft Transport & Civil Engineering Ltd.	Galway County Council
SSF-COR-G-19-0003-01	Evergreen Fields Ltd.	Galway County Council
WFP-G-20-0003-01	Bruscar Bhearna Teoranta	Galway County Council
WFP-G-19-0004-01	CSC Components Ltd.	Galway County Council
WFP-G-20-0006-01	Nohilly Dismantlers Ltd	Galway County Council
WFP-G-20-0001-01	Headford Road Car Dismantlers Ltd	Galway County Council
WFP-G-20-0005-01	Barry Quinn Transport Ltd	Galway County Council
WFP-G-20-0009-01	Bruscar Bhearna Teoranta	Galway County Council
WFP-G-21-0001-01	Forde Dismantlers Limited	Galway County Council
WFP-G-20-0007-01	Connaught Waste Recycling Co. Ltd	Galway County Council
WFP-G-21-0002-01	Brendan Higgins Car Dismantlers Limited	Galway County Council
WFP-G-21-0004-01	Expert Truck Dismantler and Sales Limited	Galway County Council
WFP-G-21-0005-01	Connaught Timber Products Ltd	Galway County Council
WFP-G-21-0003-01	Frylite (Ireland) Limited	Galway County Council
WFP-G-18-0002-01	Roadstone Limited	Galway County Council
COR-KY-11-0001-02	Sean Jones	Kerry County Council
WFP-KY-11-0008-02	Mac Waste Management Services Ltd	Kerry County Council
COR-KY-16-0001-01	O'Driscoll Plant Hire Ltd.	Kerry County Council
WFP-KY-15-0007-02	Killarney Waste Disposal Ltd	Kerry County Council
WFP-KY-11-0009-02	Reens Garage, Test Centre and Body Shop Ltd	Kerry County Council
COR-KY-09-0004-03	South Western Scrap Metal Company Ltd	Kerry County Council
COR-KY-17-0002-01	Sean Jones	Kerry County Council
WFP-KY-12-0002-02	Michael Joseph Ahern & Michael Patrick Ahern	Kerry County Council
COR-KY-17-0004-01	Tom O'Grady & Son Construction Ltd	Kerry County Council
WFP-KY-17-0002-01	Michael Dowd	Kerry County Council
WFP-KY-17-0001-01	Kerry ELV Centre Ltd	Kerry County Council
WFP-KY-17-0005-01	Flor McCarthy	Kerry County Council
WFP-KY-18-0003-01	Allman Contracts Ltd	Kerry County Council
COR-KY-18-0001-01	Brendan McGillicuddy Plant Hire & Contractors	Kerry County Council
WFP-KY-17-0006-01	Eugene McCarthy	Kerry County Council
WFP-KY-16-0001-02	Green & Gold Composting Ltd	Kerry County Council
WFP-KY-08-0002-03	Thomas Relihan	Kerry County Council
WFP-KY-18-0007-01	Kenmare Plant Hire Ltd	Kerry County Council
WFP-KY-18-0004-01	Michael Walsh	Kerry County Council
COR-KY-16-0002-01	Emerald Waste Company Ltd	Kerry County Council
WFP-KY-09-0001-03	Kelly Farm Modernisation Ltd	Kerry County Council
COR-KY-19-0001-01	Waterville GAA Club	Kerry County Council



## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-KY-18-0009-01	Green & Gold Composting Ltd	Kerry County Council
WFP-KY-18-0001-01	Higgins Waste & Recycling Services Ltd	Kerry County Council
COR-KY-19-0003-01	Farran Plant Hire Ltd	Kerry County Council
WFP-KY-19-0001-01	Thomas & Denise Relihan	Kerry County Council
COR-KY-19-0002-01	Enva Organics Ltd	Kerry County Council
WFP-KY-15-0001-02	JJ Walshe	Kerry County Council
WFP-KY-19-0003-01	Joe Savage Ltd.	Kerry County Council
COR-KY-14-0002-02	Jnsel Agri Services Ltd	Kerry County Council
WFP-KY-08-0004-03	Declan McGaley	Kerry County Council
WFP-KY-20-0005-01	Timothy Doyle	Kerry County Council
WFP-KY-20-0006-01	Liebherr Container Cranes Ltd	Kerry County Council
WFP-KY-10-0001-05	Dillon Waste	Kerry County Council
WFP-KY-20-0007-01	Brendan Cremin	Kerry County Council
WFP-KY-20-0004-01	ML Lynch Civil Engineering Ltd	Kerry County Council
WFP-KY-11-0002-03	Donal Murhill	Kerry County Council
WFP-KY-20-0003-01	South Western Scrap Metal Co. Ltd	Kerry County Council
WFP-KY-20-0008-01	Jimmy O'Mahony	Kerry County Council
WFP-KY-20-0001-01	Healy Rae Plant Hire Ltd	Kerry County Council
WFP-KY-21-0001-01	Dermot Clancy Landfill Ltd	Kerry County Council
WFP-KY-21-0003-01	McSweeney Bros. Quarries Ltd	Kerry County Council
WFP-KY-21-0004-01	Joseph Tyther	Kerry County Council
COR-KY-11-0008-03	Brian Bruton	Kerry County Council
COR-KY-21-0001-01	Gerard McElligott	Kerry County Council
WFP-KY-16-0003-01	Farm Waste Recycling (FWR) Ltd	Kerry County Council
WFP-KY-18-0008-03	Dermot Clancy Landfill Ltd	Kerry County Council
COR-KY-15-0002-02	Higgins Waste & Recycling Services Ltd.	Kerry County Council
COR-KY-21-0002-01	Stephen O Connell	Kerry County Council
WFP-KY-17-0003-02	Chaireil na Sceilge Teoranta	Kerry County Council
WFP-KE-10-0064-01	Cleary Compost & Shredding Ltd	Kildare County Council
WFP-KE-15-0079-01	All Spares (Kildare) Ltd	Kildare County Council
WFP-KE-15-0075-01	Aford Ltd	Kildare County Council
WFP-KE-15-0076-01	Phoenix RM Limited	Kildare County Council
WFP-KE-16-0083-01	Callan Sand & Gravel Limited	Kildare County Council
WFP-KE-16-0085-01	Kilsaran Concrete	Kildare County Council
WFP-KE-16-0082-01	Copart Vehicle Auctions Ireland Limited	Kildare County Council
WFP-KE-17-0086-01	RPM Greentech Ireland Ltd	Kildare County Council
COR-KE-17-0027-01	Martin Coyne & Adele Clinton	Kildare County Council
COR-KE-18-0030-01	Merlon Contractors Limited	Kildare County Council

Authorisation No.	Name of Facility	Local Authority
WFP-KE-18-0093-01	Bolton Biofuels Ltd	Kildare County Council
COR-KE-18-0031-01	Robert Wilson-Wright	Kildare County Council
WFP-KE-18-0087-01	Arkil Limited	Kildare County Council
WFP-KE-18-0092-01	Liam Kelly	Kildare County Council
WFP-KE-18-0090-01	Oliver Richardson	Kildare County Council
WFP-KE-18-0088-01	Corcoran Auto Body Works Ltd	Kildare County Council
WFP-KE-19-0094-01	Irish Lamp Recycling Co Ltd	Kildare County Council
WFP-KE-19-0095-01	Garden Waste Recycling Ltd	Kildare County Council
COR-KE-19-0033-01	Tommy & Dawn Lynch	Kildare County Council
COR-KE-19-0034-01	Bluebell Residential Ltd	Kildare County Council
WFP-KE-20-0098-01	Robert Wilson Wright	Kildare County Council
COR-KE-20-0035-01	Harbour House Sports Club	Kildare County Council
WFP-KE-20-0097-01	Callan Recycling Ltd	Kildare County Council
WFP-KE-20-0099-01	Shannon Valley Plant Hire Unlimited Company	Kildare County Council
WFP-KE-20-0102-01	Office of Public Works	Kildare County Council
WFP-KE-19-0096-01	Nordvale Ltd	Kildare County Council
WFP-KE-20-0104-01	Nickolas Walsh	Kildare County Council
WFP-KE-20-0101-01	J Ryan Haulage Ltd	Kildare County Council
WFP-KE-20-0103-01	J Ryan Haulage Ltd	Kildare County Council
COR-KE-20-0036-01	Robertstown GFC	Kildare County Council
WFP-KE-20-0105-01	Wilton Scrap Metals Ltd	Kildare County Council
COR-KE-20-0037-01	Kollect on Demand Ltd	Kildare County Council
WFP-KE-21-0106-01	G & J O'Neill Enterprises Ltd	Kildare County Council
WFP-KE-21-0107-01	All Spares (Kildare) Ltd	Kildare County Council
COR-KE-21-0038-01	Ballymore Ireland Contracting Services Ltd	Kildare County Council
WFP-KE-21-0108-01	Eire Og Corra Choill Hurling Club	Kildare County Council
COR-KE-21-0039-01	J Ryan Haulage Ltd.	Kildare County Council
WFP-KK-14-0009-01	Kilkenny Carlow & District Farm Relief Services Society Ltd	Kilkenny County Council
WFP-KK-15-0004-01	Blackdog Recycling Ltd	Kilkenny County Council
WFP-KK-16-0001-01	Crystalhill Inns Ltd	Kilkenny County Council
WFP-KK-16-0006-01	Paul Kealy	Kilkenny County Council
WFP-KK-16-0009-04	Molloy Metals Recycling Ltd	Kilkenny County Council
WFP-KK-16-0008-03	Joe Hollywood	Kilkenny County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-KK-16-0010-03	Doheny Wheelie Bins & Recycling Ltd	Kilkenny County Council
WFP-KK-17-0002-03	Ger Mulhall	Kilkenny County Council
WFP-KK-17-0001-03	Philip McBride	Kilkenny County Council
COR-KK-17-0002-01	O'Shea Farms	Kilkenny County Council
WFP-KK-17-0003-02	M&E Kent Catsrock Ltd	Kilkenny County Council
WFP-KK-18-0001-03	K Mooney Ltd (T/A WTCS)	Kilkenny County Council
WFP-KK-19-0002-03	BEOFS Ltd	Kilkenny County Council
WFP-KK-19-0003-03	Starrus Eco Holdings Ltd	Kilkenny County Council
WFP-KK-20-0004-04	Michael Madden Car Spares Ltd	Kilkenny County Council
WFP-KK-20-0001-01	JJX Logistics Ltd.	Kilkenny County Council
WFP-KK-20-0002-04	C.T.B Recycling Ltd	Kilkenny County Council
WFP-KK-19-0004-02	Coogan Autos Ltd	Kilkenny County Council
WFP-KK-20-0003-02	Merriville Ltd	Kilkenny County Council
WFP-KK-20-0006-03	Paschal Power	Kilkenny County Council
WFP-KK-20-0007-04	Colman Ryan	Kilkenny County Council
WFP-KK-20-0008-01	James Murphy	Kilkenny County Council
WFP-KK-21-0001-02	Roadstone Ltd	Kilkenny County Council
WFP-LS-15-0004-01	Whelan Auto Dismantlers	Laois County Council
WFP-LS-15-0005-01	Martin Byrne Car Dismantlers	Laois County Council
WFP-LS-16-0001-01	Munnely Brothers Car Sales Ltd	Laois County Council
WFP-LS-16-0006-01	Hinch Plant Hire Ltd	Laois County Council
WFP-LS-16-0004-01	Enva Organics Ltd	Laois County Council
WFP-LS-17-0001-01	Interrec B.V. Ireland Ltd	Laois County Council
Ref no SSF/02	SEDE	Laois County Council
COR-LS-18-0001-01	Kilcotton GAA Club	Laois County Council

Authorisation No.	Name of Facility	Local Authority
WFP-LS-18-0002-01	Dowling Quarries Ltd	Laois County Council
WFP-LS-19-0005-01	Trifol Operations Ltd	Laois County Council
WFP-LS-19-0006-01	A1 Metal Recycling Ltd	Laois County Council
COR-LS-20-0001-01	St Joseph's GAA Club	Laois County Council
WFP-LS-19-0007-01	Corcoran's Auto Body Works Limited	Laois County Council
WFP-LS-19-0004-01	V-Tec Metals & Dismantlers Ltd	Laois County Council
WFP-LS-20-0001-01	Rockbrook AD Limited	Laois County Council
SSF/03	Michael Costello	Laois County Council
COR-LS-20-0002-01	Kollect on Demand Limited	Laois County Council
WFP-LS-21-0002-01	Micheal Johnson	Laois County Council
WFP-LM-16-001-01	Darren Reilly	Leitrim County Council
WFP-LM-10-001-04	ACE 4x4 Spares Ltd	Leitrim County Council
COR-LM-15-001-02	Seamus Kerrigan Ltd	Leitrim County Council
WFP/LK/2014/167	Glynn O'Neill	Limerick City and County Council
WFP/L/2016/180	Polymer Recycling Ltd.	Limerick City and County Council
WFP/L/2016/147A/R2	United Metal Recycling (Ireland) Ltd	Limerick City and County Council
WFP/L/2015/146A/R1	Dermot Kelly Motors Ltd	Limerick City and County Council
COR-L-2017-186	Derry White Skip Hire Ltd	Limerick City and County Council
WFP/L/2017/184	Truckbreak Ltd	Limerick City and County Council
WFP/L/2017/183	Tungco Worldwide Ltd	Limerick City and County Council
WFP/L/2017/83A/R2	Greaney Concrete Products Ltd.	Limerick City and County Council
WFP/L/2016/11/003/01/R1	United Metal Recycling (Ireland) Ltd	Limerick City and County Council
WFP/L/2017/50/R4/T1	McDonnell Farms Biogas Ltd	Limerick City and County Council
WFP/L/2017/05B/R2	Thomas O'Neill (Grain Merchants) Ltd	Limerick City and County Council
WFP/L/2017/87C/R2/T1	Dan Dooley Group Ltd	Limerick City and County Council
WFP/L/2017/155/T1/R1	Habanville Ltd.	Limerick City and County Council
COR/L/2016/156/T1/R1	PSLM Plant Hire Ltd.	Limerick City and County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP/L/2017/13/001/01/R1	Limerick City ATF Ltd	Limerick City and County Council
WFP/L/2014/138/T1/R1	JM Car Sales and Dismantlers Ltd.	Limerick City and County Council
WFP/L/2017/190	William Long	Limerick City and County Council
COR/L/2018/160/R2	Liam Mulcair	Limerick City and County Council
WFP/L/2018/192	Greenvalley Transport & Land Reclamation Ltd.	Limerick City and County Council
COR/L/2018/187/T1	McGrath Heavy Transport Ltd	Limerick City and County Council
WFP/L/2018/194	McGrath Heavy Transport Ltd.	Limerick City and County Council
WFP/L/2018/164/R1	Greentech Plastics Ltd.	Limerick City and County Council
WFP/L/2018/195	United Metal Recycling Ireland Ltd.	Limerick City and County Council
COR/L/2018/197	Kollect on Demand Ltd	Limerick City and County Council
COR/L/2018/196	Kollect on Demand Ltd	Limerick City and County Council
WFP/L/2018/159/T1/R3	Abbey Moulding Contractors Ltd	Limerick City and County Council
WFP-L-2018-189-R1	Coolrus Plant Hire Ltd	Limerick City and County Council
WFP/L/2018/22B/T1/R1	Rory Flahive	Limerick City and County Council
WFP/L/2019/16C/R1/T1	Enhire Ltd	Limerick City and County Council
WFP/L/2018/199	Coolrus Plant Hire Ltd	Limerick City and County Council
COR/L/2018/201	Kollect on Demand Ltd	Limerick City and County Council
COR/L/2018/200	Ace Autobody (Ballysimon) Limerick Ltd	Limerick City and County Council
COR/L/2019/202	1 Walkers Limerick Land Ltd	Limerick City and County Council
WFP/L/2019/09C/R4	DGD Papers Ltd	Limerick City and County Council
WFP/L/2019/153A/R2/T1	Christian Anochie	Limerick City and County Council

Authorisation No.	Name of Facility	Local Authority
COR/L/2019/204	Shareridge Ltd	Limerick City and County Council
COR/L/2019/205	Derry White Skip Hire Ltd	Limerick City and County Council
WFP-L-2019-11A-R4	Ward Waste Products Ltd	Limerick City and County Council
WFP-L-2019-206	Karmarton Ltd	Limerick City and County Council
COR/L/2019/198/R2	Michael Bagnell	Limerick City and County Council
WFP/L/2019/173/R2	Carey Glass UC	Limerick City and County Council
WFP/L/2019/11/002/01/R2	William Fitzgerald Skip Hire Ltd	Limerick City and County Council
WFP/L/2020/56D/R1	JM Car Sales & Dismantlers Ltd	Limerick City and County Council
WFP-L-2020-170-R4	Sheahan Waste Recycling Ltd	Limerick City and County Council
WFP/L/2020/163/R2	Seamus Delee	Limerick City and County Council
COR/L/2020/207	Gracon Equipment Inspection Ltd	Limerick City and County Council
WFP/L/2020/176/R1	Kilteely Dromkeen Innovation Ltd	Limerick City and County Council
WFP/L/2020/03D/R3/T1	Autotowing Ltd	Limerick City and County Council
COR/L/2020/208	Kollect on Demand Ltd.	Limerick City and County Council
COR/L/2020/209	Kollect on Demand Ltd.	Limerick City and County Council
COR/L/2020/210	Carrons Haulage Ltd	Limerick City and County Council
WFP/L/2019/23A/R10	Cremins Farm Compost Ltd	Limerick City and County Council
WFP/L/2020/11/001/01/R7/T1	Limerick Metal Recycling Company Ltd	Limerick City and County Council
WFP/L/2021/07C/R2/T1	Envyrotech Ltd.	Limerick City and County Council
WFP-L-2021-145-R2	Rentokil Initial Ltd.	Limerick City and County Council
WFP/L/2021/21B/R4	David O'Riordan	Limerick City and County Council



## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP/L/2021/12/001/01/R3/T1	Limerick Polymers Production Unlimited Company	Limerick City and County Council
WFP/L/2020/10/001/01/R6/T1	Limerick Metal Recycling Company Ltd	Limerick City and County Council
WFP/L/2021/119	Dereen Concrete Ltd.	Limerick City and County Council
WFP/L/2021/17D/R5	Derry White Skip Hire Ltd.	Limerick City and County Council
COR/L/2021/213	Derry White Skip Hire Ltd.	Limerick City and County Council
WFP/L/2021/203/R1	Valcroft Unlimited	Limerick City and County Council
COR-LD-12-0004-01	Keenagh Gun Club	Longford County Council
WFP-LD-17-0005-01	Mulleady Polymers Ltd	Longford County Council
WFP-LD-17-0001-01	John Crossan	Longford County Council
WFP-LD-17-004-01	Longford Auto Recyclers Ltd	Longford County Council
WFP-LD-17-003-01	M & N Nolan Motor Company Ltd	Longford County Council
COR-LD-17-0002-01	Sean Cahill	Longford County Council
COR-LD-17-0015-01	County Longford Golf Club	Longford County Council
WFP-LD-17-006-01	Sean O'Hara Motors Ltd	Longford County Council
COR-LD-17-0013-01	Kathleen Clarke	Longford County Council
COR-LD-17-0009-01	Victor Kiernan	Longford County Council
COR-LD-17-0010-01	Liam Finnegan	Longford County Council
WFP-LD-17-0007-01	John Ward	Longford County Council
COR-LD-18-0001-01	James Jordan	Longford County Council
WFP-LD-17-0002-01	Furniture Recycling Ltd	Longford County Council
COR-LD-18-0009-01	Aidan Farrell	Longford County Council

Authorisation No.	Name of Facility	Local Authority
WFP-LD-18-0001-01	Mimergy Ltd	Longford County Council
WFP-LD-16-0001-02	Blessington Stone & Concrete Plant Hire	Longford County Council
COR-LD-18-0004-01	Colmcille GAA	Longford County Council
COR-LD-18-0010-01	Harry Hughes & Mary Hughes	Longford County Council
COR-LD-18-0003-01	Thomas O'Connor	Longford County Council
SSF-LD-2018/01	Lynch Envirocare Ltd	Longford County Council
COR-LD-19-0003-01	John McGee	Longford County Council
COR-LD-19-0002-01	James McLoughlin	Longford County Council
WFP-LD-15-0001-03	Mark Cadam Ltd	Longford County Council
COR-LD-20-0002-01	Mark Cadam Ltd	Longford County Council
WFP-LD-14-0001-02	Giedrius Jocys	Longford County Council
COR-LD-20-0004-01	Shannon Plant & Agri Contractors	Longford County Council
COR-LD-21-0001-01	Kevin Donnelly	Longford County Council
COR-LD-21-0002-01	Michael Harte	Longford County Council
COR-LD-21-003-02	Martin Reilly	Longford County Council
COR-LD-21-003-01	Martin Reilly	Longford County Council
COR-LD-21-0004-01	Michael Delaney	Longford County Council
COR-LD-21-0005-01	Padraig Delaney	Longford County Council
COR-LD-20-0003-01	Pauric Brady	Longford County Council
WFP-LH-16-0001-01	Exomex (Ireland) Ltd	Louth County Council
COR-LH-16-0002-01 (Revision B)	John O'Neill	Louth County Council
WFP-LH-17-0001-01	John O'Neill Sand & Gravel Ltd	Louth County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-LH-11-0002-02	Lenviron Ltd	Louth County Council
WFP-LH-11-0004-02	Dungooley Recycling Limited	Louth County Council
WFP-LH-18-0001-01	Naomh Moninne Hurling Club	Louth County Council
WFP-LH-18-0005-01	John O'Neill	Louth County Council
WFP-LH-18-0007-01	SAF Building and Civil Engineering Ltd	Louth County Council
WFP-LH-18-0006-01	Cool Cat Plant and Services Ltd	Louth County Council
WFP-LH-15-0002-03	Advanced Environmental Solutions (IRL) Limited	Louth County Council
COR-LH-18-0002-01	Balfour Beatty	Louth County Council
WFP-LH-11-0005-03	Rentokil Initial Ltd	Louth County Council
WFP-LH-09-0003-03	Martin Duffy	Louth County Council
WFP-LH-19-0003-01	Cian Maguire Farms Ltd	Louth County Council
WFP-LH-19-0004-01	Haughey Metals Ltd (Ire)	Louth County Council
COR-LH-13-0004-02	Kilsaran Concrete	Louth County Council
WFP-LH-09-0002-03	McParland Bros (Ireland) Ltd	Louth County Council
COR-LH-09-0003-03	M&M Recovery & Breakdown Services Ltd	Louth County Council
WFP-LH-19-0005-01	O'Hanlon & Sons Contractors Ltd.	Louth County Council
WFP-LH-15-0001-02	Express Mini Mix & Skip Hire Ltd	Louth County Council
WFP-LH-10-0004-03	Fiodav Ltd	Louth County Council
WFP-LH-10-0003-03	Gary Myles	Louth County Council
WFP-LH-14-0003-02	Pacsort Ltd	Louth County Council
WFP-LH-10-0008-03	J & M McShane	Louth County Council
COR-LH-20-0002-01	McConnors Vehicle Recovery Limited	Louth County Council
WFP-LH-20-0004-01	Walshestown Restoration Ltd	Louth County Council
COR-LH-20-0003-01	Premier Engineering Ltd	Louth County Council
WFP-LH-18-0003-02	Ardcashel Groundworks Ltd	Louth County Council
WFP-LH-20-0001-02	John O'Neill Sand and Gravel Ltd	Louth County Council
WFP-LH-14-0004-03	Exomex Ireland Ltd.	Louth County Council
WFP-LH-11-0007-03	Oriel Auto Specialists	Louth County Council
COR-LH-21-0002-01	Larry Kiernan Plant Hire Ltd	Louth County Council
COR-LH-21-0001-01	Michael Ferguson Ltd	Louth County Council
COR-MO-15-0036-01	Conor O'Malley	Mayo County Council
COR-MO-15-0035-01	John O'Grady	Mayo County Council
WFP-MO-15-0037-01	G&N Loftus Recycling & Sons Ltd	Mayo County Council
COR-MO-15-0037-01	Cloonfad United Football Club	Mayo County Council
COR-MO-15-0039-01	Mullafarry Quarry Ltd	Mayo County Council
COR-MO-16-0040-01	P&D Lydon Plant Hire Ltd	Mayo County Council
COR-MO-16-0041-01	Burrishoole Community Partnership Ltd	Mayo County Council
COR-MO-16-0042-01	Thomas Bennett	Mayo County Council

Authorisation No.	Name of Facility	Local Authority
WFP-MO-17-0039-01	Dominick O'Reilly Transport Services Ltd.	Mayo County Council
COR-MO-17-0043-01	Michael O'Malley Tarmacadam Contractors Ltd	Mayo County Council
WFP-MO-17-0040-01	McGrath Industrial Waste Ltd.	Mayo County Council
WFP-MO-15-0036-02	Eoghan Cunningham	Mayo County Council
WFP-MO-12-0025-02	Sean Naughton	Mayo County Council
COR-MO-17-0045-01	Finnegans Sand Ltd	Mayo County Council
COR-MO-18-0051-01	Pat King	Mayo County Council
WFP-MO-13-0030-02	McGrath Industrial Waste Ltd	Mayo County Council
WFP-MO-17-0041-01	Eirtrade Aviation Ireland Ltd	Mayo County Council
WFP-MO-12-0024-02	Ballinrobe Waste Disposal Ltd	Mayo County Council
WFP-MO-12-0023-02	Jackson Engineering (Castlebar) Ltd	Mayo County Council
COR-MO-17-0044-01	Billy McDonald	Mayo County Council
COR-MO-17-0046-01	Ann Navin	Mayo County Council
COR-MO-17-0047-01	Dominic Mulchrone	Mayo County Council
COR-MO-17-0048-01	Joe Mortimer	Mayo County Council
COR-MO-17-0049-01	Matrix Energy Partnership No. 1	Mayo County Council
COR-MO-18-0050-01	Gibbons Building & Civil Engineering Ltd	Mayo County Council
COR-MO-18-0052-01	Aughagower Community Development Ltd	Mayo County Council
WFP-MO-14-0034-02	Lennon Quarries Ltd	Mayo County Council
COR-MO-19-0063-01	Tom Denning	Mayo County Council
WFP-MO-19-0044-01	Bourke Waste Removals Ltd	Mayo County Council
COR-MO-19-0055-01	Stanley Bourke	Mayo County Council
WFP-MO-10-0014-03	CJ Sheeran Ltd	Mayo County Council
COR-MO-18-0053-01	Westport United Community Soccer Club Ltd	Mayo County Council
COR-MO-19-0059-01	P & D Lydon Plant Hire Ltd	Mayo County Council
COR-MO-19-0056-01	Harrington Concrete & Quarries	Mayo County Council
COR-MO-19-0062-01	Lennon Quarries Ltd	Mayo County Council
COR-MO-18-0054-01	Fahy Community Development Committee & Fahy Rovers AFC	Mayo County Council
COR-MO-20-0065-01	Michael Monaghan	Mayo County Council
WFP-MO-20-0048-01	Wills Bros, BAM Joint Venture	Mayo County Council
WFP-MO-19-0046-01	John Hoade	Mayo County Council
COR-MO-20-0064-01	JP Gibbons	Mayo County Council
COR-MO-15-0038-01(T)	Mark Carr	Mayo County Council
WFP-MO-10-0009-03	VK Agri Recycling Ltd.	Mayo County Council
COR-MO-19-0061-01	McGrath Industrial Waste Ltd	Mayo County Council
COR-MO-19-0057-01	Michael Cannon	Mayo County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
COR-MO-19-0060-01	Erris Home Property Development Ltd	Mayo County Council
COR-MO-19-0058-01	Emma Cawley	Mayo County Council
WFP-MO-19-0045-01	Sean & Majella Mulchrone	Mayo County Council
WFP-MO-20-0052-01	Wills Bros, BAM Joint Venture	Mayo County Council
WFP-MO-20-0054-01	Wills Bros, BAM Joint Venture	Mayo County Council
WFP-MO-20-0055-01	Wills Bros, BAM Joint Venture	Mayo County Council
WFP-MO-20-0056-01	Wills Bros, BAM Joint Venture	Mayo County Council
WFP-MO-15-0035-02	Coolturk Quarries Ltd	Mayo County Council
COR-MO-20-0066-01	John Craven	Mayo County Council
WFP-MO-20-0053-01	Wills Bros, BAM Joint Venture	Mayo County Council
WFP-MO-10-0215-03	Damian & Alan Dempsey. Dempseys Car and Van Spares Ltd	Mayo County Council
WFP-MO-20-0058-01	Connaught Enviro Containers DAC	Mayo County Council
WFP-MO-11-0016-03	Kevin McNamara	Mayo County Council
WFP-MO-10-0008-03	Michael Devaney	Mayo County Council
WFP-MO-20-0059-01	Mangan Concrete & Haulage Ltd	Mayo County Council
WFP-MO-21-0062-01	Harrington Concrete & Quarries	Mayo County Council
WFP-MO-11-0019-03	Feoil Freight Ltd.	Mayo County Council
COR-MO-21-0067-01	County Plant Hire Ltd	Mayo County Council
WFP-MO-20-0057-01	Wills Bros, BAM Joint Venture	Mayo County Council
COR-MO-21-0068-01	Quignashee Plant Hire	Mayo County Council
WFP-MO-18-0043-02	Heating Systems & Thermal Systems (Europe) Ltd	Mayo County Council
WFP-MH-14-0010-01	OCAE Consultants Limited	Meath County Council
WFP-MH-10-0002-02	KJP Spares Limited	Meath County Council
WMP 2008/23	Martin Doolan	Meath County Council
WFP-MH-10-0011-02	Eugene McKenna	Meath County Council
WFP-MH-14-0005-02	Michael Keane	Meath County Council
WFP-MH-10-0007-02	Gerard & Margaret Doolin	Meath County Council
WFP/MH/16/0002/01	Cool Cat Plant Services Ltd	Meath County Council
WFP/MH/16/0001/01	John Conaty Limited	Meath County Council
WFP/MH/16/0004/01	Kilsaran Concrete	Meath County Council
WFP/MH/10/0008/03	Martin Brady	Meath County Council
WFP/MH/16/0005/01	John Coyle	Meath County Council
WFP/MH/17/0002/01	Fintan Mulchrone	Meath County Council
COR/MH/17/0002/01	Tarstone Road Maintenance Ltd	Meath County Council
SSF-COR-MH-12-0002-02	Enva Ireland	Meath County Council
WFP-MH-17-0006-01	Christopher Rafter	Meath County Council
WFP-MH-17-0004-01	Carno International Ltd	Meath County Council

Authorisation No.	Name of Facility	Local Authority
WFP-MH-17-0005-01	Gloine Recycling Ltd	Meath County Council
WFP-MH-12-0005-02	Rabbitte Catering Services Ltd.	Meath County Council
WFP-MH-17-0003-01	Patrick Carberry	Meath County Council
COR-MH-17-0006-01	Mid Cork Pallets & Packaging Ltd	Meath County Council
WFP/MH/17/0001/01	Windtown Galtrim Limited	Meath County Council
WFP-MH-18-0001-01	Christopher McHugh	Meath County Council
WFP/MH/18/0004/01	Agrimann B.M. Ltd	Meath County Council
WFP/MH/18/0005/01	Thomas Curtis	Meath County Council
WFP/MH/18/0002/01	Ronan Sheridan Plant Hire Ltd	Meath County Council
SSF/COR/MH/12/0001/02	Adrian Lindsay Fynn	Meath County Council
WFP/MH/18/0006/01	Ronan Sheridan Plant Hire Ltd	Meath County Council
WFP/MH/18/0007/01	Rudder Transport Limited	Meath County Council
COR-MH-18-0003-01	GF Farrelly Haulage Limited	Meath County Council
SSF-COR-MH-13-0002-02	Paddy Brady Agri Ltd	Meath County Council
COR-MH-19-0002-01	Pure Oil Limited	Meath County Council
SSF-COR-MH-13-0003-02	Paddy Brady Agri Limited	Meath County Council
SSF/COR/MH/12/0003/02	Enva Ireland Ltd	Meath County Council
WFP-MH-19-0001-01	Enda O'Rafferty	Meath County Council
WFP-MH-18-0010-01	Lagan Materials Limited	Meath County Council
WFP-MH-12-0007-02	Michael Ferguson Ltd	Meath County Council
WFP-MH-12-0002-02	Labroc Limited	Meath County Council
WFP-MH-19-0007-01	Stephenson Transport Ltd	Meath County Council
WFP-MH-19-0006-01	JOC Construction Recruitment Ltd	Meath County Council
WFP-MH-14-0003-02	Patrick Brady Agri Limited	Meath County Council
COR-MH-14-0003-02	Enva Ireland Ltd	Meath County Council
WFP/MH/19/0005/01	Food Surplus Management	Meath County Council
WFP/MH/18/0008/01	Food Surplus Management Limited	Meath County Council
WFP-MH-14-0008-02	TYRES2OIL Ltd	Meath County Council
WFP-MH-19-0003-02	Shannon Valley Plant Hire Unlimited	Meath County Council
WMP 2007/69	Bartle Lenehan	Meath County Council
COR-R02723-01	Rooske Burial Ground Extension	Meath County Council
WFP/MH/19/0009/01	Rossmore Civils Limited	Meath County Council
COR-MH-19-0004-01	J Powell Property Maintenance Ltd	Meath County Council
WFP-MH-19-0008-01	JMN Waste Services Limited	Meath County Council
WFP-MH-19-0010-01	Timberun Trading Limited	Meath County Council
WFP-MH-20-0002-01	J&S Motor Repair Ltd	Meath County Council
WFP/MH/09/0008/04	OMD Waste Recycling Ltd.	Meath County Council



## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-MH-20-0008-01	Great White Destruction Ltd	Meath County Council
WFP-MH-20-0007-01	Eoin Smith Ltd	Meath County Council
COR/MH/18/0001/02	Rudder Transport Limited	Meath County Council
COR/MH/20/0002/01	Oliver Finnegan	Meath County Council
WFP/MH/20/0006/01	Tomas Kairys	Meath County Council
WFP/MH/20/0005/01	Shane Thornton	Meath County Council
WFP/MH/14/0002/02	Rexton Car Parts Limited	Meath County Council
WFP/MH/09/0003/05	Irish Metal Refineries Ltd	Meath County Council
WFP/MH/20/0003/01	Stephen Kinsella Motors Limited	Meath County Council
COR/MH/20/0004/01	Declan Madden	Meath County Council
WFP/MH/15/0002/02	Roadstone Limited	Meath County Council
COR/MH/21/0001/01	Hallquar Engineering Services Ltd.	Meath County Council
WFP/MH/18/0008/02	Food Surplus Management Limited	Meath County Council
SSF-COR-MH-21-0001-01	Biocore Environmental Limited	Meath County Council
COR-MH-20-0003-01	Rudder Transport Limited	Meath County Council
COR-MH-21-0002-01	Brian Kenny	Meath County Council
WFP-MH-10-0001-03	Oristown Auto Recyclers Limited	Meath County Council
WFP-MH-20-0004-01	Patrick Carberry	Meath County Council
WFP-MH-21-0002-01	Davin Plant Hire Limited	Meath County Council
WFP-MH-21-0006-01	Maynooth Spare Parts Ltd	Meath County Council
WFP/MH/21/0004/01	Michael Keane	Meath County Council
WFP/MH/15/0004/02	N2 Auto Salvage Limited	Meath County Council
WFP/MH/21/0008/01	Integrated Materials DC Limited	Meath County Council
WFP/MH/10/0013/03	Nicro Metals Recycling Limited	Meath County Council
WFP/MH/21/0003/01	McKenna Utility Services Limited	Meath County Council
WFP/MH/16/0001/02	John Conaty Limited	Meath County Council
WFP-MH-21-0009-01	Rossmore Civils Limited	Meath County Council
WFP-MN-16-0001-01	Tray Parts Limited	Monaghan County Council
WFP-MN-16-0002-01	John Treanor	Monaghan County Council
WFP-MN-11-0011-03	Eamon McKenna	Monaghan County Council
COR-MN-16-0004-02	GPS Recovery Ltd	Monaghan County Council
WFP-MN-17-0001-01	Global Textile Shipping Ltd	Monaghan County Council
WFP-MN-11-0003-04	Ted Brennan Motors Limited	Monaghan County Council

Authorisation No.	Name of Facility	Local Authority
WFP-MN-18-0001-01	Niall Kelly	Monaghan County Council
WFP-MN-19-0001-01	Finnegan Waste Recycling Limited	Monaghan County Council
WFP-MN-08-0022-08	Shabra Recycling Limited	Monaghan County Council
WFP-MN-19-0003-01	DSCCS Limited	Monaghan County Council
COR-MN-20-0001-01	Lowry Construction Ltd.	Monaghan County Council
WFP-MN-10-0001-03	McElvaney Motors Ltd	Monaghan County Council
WFP-MN-15-0001-02	Rory McEleavy	Monaghan County Council
WFP-MN-15-0002-03	Eugene Conlon	Monaghan County Council
COR-MN-19-0001-03	Brickworks Limited	Monaghan County Council
COR-MN-10-0005-04	PJ McCabe	Monaghan County Council
COR-MN-20-0002-01	Newrath Transport Ltd	Monaghan County Council
COR-MN-20-0003-01	George McKenna	Monaghan County Council
COR-MN-19-0002-02	D&N Plant Ltd.	Monaghan County Council
WFP-MN-10-0004-(05)	Charlie Byrne	Monaghan County Council
COR-MN-21-0002-01	P J Keenan	Monaghan County Council
WFP-MN-11-0009-08	Blue Dolphin Environmental Limited	Monaghan County Council
WFP-MN-10-0002-05	Ken Atkinson and Son Limited	Monaghan County Council
WFP-MN-21-0001-01	Patrick Kearney	Monaghan County Council
WFP-MN-21-0003-01	Robowash Limited	Monaghan County Council
COR-MN-21-0003-01	Raven Plant Hire Ltd	Monaghan County Council
WFP-MN-11-0004-03	Terralift Ireland Ltd.	Monaghan County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-MN-21-0004-01	Flamewood Ltd.	Monaghan County Council
WFP-MN-12-0001-06	ADN Materials Limited	Monaghan County Council
WFP-MN-20-0004-01	Exomex (Ireland) Limited	Monaghan County Council
COR-MN-21-0004-01	Richard Graham	Monaghan County Council
WFP-MN-11-0008-04	Patrick McQuaid	Monaghan County Council
WFP-15-99999-01	Tom Bloggs	Offaly County Council
WFP-OY-14-0197-01	Pat Mangan	Offaly County Council
WFP-OY-15-0198-01	Condron Concrete Limited	Offaly County Council
COR-OY-11-0004-02	Killeshal Precast Concrete Ltd	Offaly County Council
WFP-OY-08-0167-03	Hinch Plant Hire Ltd	Offaly County Council
WFP-10-OY-0183-03	Guessford Limited	Offaly County Council
COR-OY-15-007-01	Doolan Plant Hire Limited	Offaly County Council
WFP-OY-16-0199-01	Anthony Cocoman	Offaly County Council
WFP-OY-10-0184-02	Gregory Kinahan Sales Ltd	Offaly County Council
WFP-OY-17-0200-01	Hinch Plant Hire Ltd	Offaly County Council
WFP-OY-18-0202-01	John Mallen	Offaly County Council
WFP-OY-17-0201-01	Healion Contractors Ltd	Offaly County Council
WFP-OY-10-0183-03	Guessford Limited	Offaly County Council
WFP-OY-11-0191-02	Orla Canton & Damien Barry	Offaly County Council
WFP-OY-19-0203-01	Waste Matters Limited	Offaly County Council
WFP-OY-19-0204-01	Kilmurray Pre-Cast Concrete Ltd	Offaly County Council
COR-OY-20-0008-01	Ellsport Ltd	Offaly County Council
WFP-10-OY-0182-03	David Bracken Junior	Offaly County Council
WFP-OY-10-0180-03	Condron Car Dismantlers Ltd	Offaly County Council
WFP-13-OY-0193-02	Condron Tyres Ltd	Offaly County Council
WFP-RN-09-0004-02	James Fitzgerald	Roscommon County Council
WFP-RN-16-0001-01	Irish Pallet Systems Limited	Roscommon County Council
WFP-RN-11-0002-02	BioCore Environmental AD1 Ltd	Roscommon County Council
WFP-RN-10-0002-02	Hannon Poultry Exporting Co. Ltd.	Roscommon County Council
COR-RN-17-0001-01	Hanly Quarries Ltd	Roscommon County Council

Authorisation No.	Name of Facility	Local Authority
COR-RN-17-0002-01	Tom Connolly & Sons Ltd	Roscommon County Council
WFP-RN-17-0001-01	McKeons Sand & Gravel Limited	Roscommon County Council
WFP-RN-18-0001-01	OCR Waste Management Ltd	Roscommon County Council
WFP-RN-18-0002-01	Castlerea ELV Recycling Ltd	Roscommon County Council
COR-RN-SS-18-0001-01	James Mannion	Roscommon County Council
COR-RN-SS-15-0002-01	Gerard Mulheir	Roscommon County Council
COR-RN-SS-18-0003-01	Michael Murray	Roscommon County Council
COR-RN-SS-18-0002-01	Sean Hanley	Roscommon County Council
COR-RN-SS-18-0004-01	Pat Collins	Roscommon County Council
COR-RN-09-0012-03	Conor Hannon, Athlone Properties Ltd.	Roscommon County Council
COR-RN-20-0001-01	Oisin Kelliher	Roscommon County Council
COR-RN-SS-20-0001-01	Frank Flynn	Roscommon County Council
COR-RN-SS-19-0001-01	Fergal Greene	Roscommon County Council
WFP-RN-14-0001-02	Christy Connolly	Roscommon County Council
WFP-SO-16-002-002	Mr. Dominic Quinn.	Sligo County Council
WFP-SO-17-001-04	David McNulty	Sligo County Council
COR-SO-18-001-01	Mullane Plant Hire Limited	Sligo County Council
WFP-SO-19-002-01	William Tighe	Sligo County Council
WFP-SO-19-001-01	Harrington Concrete (Sligo) ULC	Sligo County Council
WFP-SO-14-108-03	Willie McGinley	Sligo County Council
COR-SO-19-001-01	Fechin Mullen	Sligo County Council
COR-SO-20-001-01	Kollect on Demand	Sligo County Council
WFP-SO-16-001-004	The Hammond Lane Metal Company Ltd	Sligo County Council
COR-DS-15-0003-04	Harp Refrigerants Limited	South Dublin County Council
WFP-DS-11-0013-03	Marie Cullen	South Dublin County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
COR-DS-17-0001-01	RDC Civil Engineering Limited	South Dublin County Council
WFP-DS-11-0009-04	Kilsaran Concrete (Ballinascorney) Limited	South Dublin County Council
WFP-DS-16-0001-04	Callan Recycling Limited	South Dublin County Council
WFP-DS-17-0003-01	Brian Warren	South Dublin County Council
WFP-DS-12-0005-03	Robert Cullen	South Dublin County Council
COR-DS-17-0005-01	Balfour Beatty CLG	South Dublin County Council
WFP-DS-15-0003-04	KN Network Services (IRE) Limited	South Dublin County Council
WFP-DS-18-0001-01	Electronic Scrap Limited	South Dublin County Council
COR-DS-14-0002-02	Doyle & Doyle Wholesale Limited	South Dublin County Council
COR-DS-17-0002-01	Refrigeration Distributors Limited	South Dublin County Council
COR-DS-18-0001-01	Capami Limited	South Dublin County Council
WFP-DS-14-0003-03	Kavanagh Recycling & Recovery Limited	South Dublin County Council
WFP-DS-14-0008-04	Karmarton Limited	South Dublin County Council
WFP-DS-19-0002-01	SIAC Bituminous Products Ltd	South Dublin County Council
WFP-DS-17-0002-03	Shred-It ROI Limited	South Dublin County Council
WFP-DS-19-0003-01	Allen Removals Limited	South Dublin County Council
COR-DS-19-0003-02	GMC Utilities Group Limited	South Dublin County Council
COR-DS-19-0002-01	M McGuire Haulage Limited	South Dublin County Council
COR-DS-19-0001-01	Kendra Civil Engineering Ireland Limited	South Dublin County Council
COR-DS-19-0004-01	JMC Van Trans Limited	South Dublin County Council
WFP-DS-19-0004-01	South Dublin Composting Company Limited	South Dublin County Council

Authorisation No.	Name of Facility	Local Authority
WFP-DS-17-0001-02	Pat Collins	South Dublin County Council
COR-DS-10-0002-04	RSL Ireland Limited	South Dublin County Council
WFP-DS-10-0002-06	Evolution Metal Recycling	South Dublin County Council
WFP-DS-15-0002-02	Gannons City Recovery & Recycling Services Limited	South Dublin County Council
WFP-DS-10-0008-06	Rehab Enterprises Limited	South Dublin County Council
WFP-DS-10-0010-06	Clondalkin Community Recycling Initiative	South Dublin County Council
COR-DS-20-0001-01	Kollect on Demand Limited	South Dublin County Council
WFP-DS-15-0001-04	MBG Distribution Limited	South Dublin County Council
WFP-DS-09-0001-04	Westlink Recovery Services Ltd	South Dublin County Council
WFP-DS-10-0007-04	Kennedy Landscape Supplies Limited	South Dublin County Council
WFP-DS-20-0003-01	Dulux Paints Ireland Limited	South Dublin County Council
WFP-DS-14-0010-02	Crossmore Transport Ltd	South Dublin County Council
WFP-DS-10-0013-05	Themroc Ltd	South Dublin County Council
WFP-DS-11-0014-06	Electrical Waste Management Ltd	South Dublin County Council
WFP-DS-11-0005-04	Roadstone Limited	South Dublin County Council
WFP-DS-21-0001-01	Amazon Data Services Ireland Limited	South Dublin County Council
WFP-DS-11-0002-06	Arneg Gate Limited	South Dublin County Council
WFP-DS-11-0004-06	Vyta Secure Limited	South Dublin County Council
WFP-DS-13-0003-04	Gannons City Recovery & Recycling Services Limited	South Dublin County Council
WFP-DS-14-0012-03	The Hammond Lane Metal Company Ltd	South Dublin County Council
WFP-DS-20-0002-02	Otis Elevator Ireland Limited	South Dublin County Council



## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-DS-14-0015-06	Martin Brower Ireland Limited	South Dublin County Council
WPF-DS-21-0002-01	Peter Lawlor	South Dublin County Council
COR-DS-18-0002-01	Allphar Services Limited	South Dublin County Council
WFP-T-10-0007-02	John Walsh	Tipperary County Council
COR-T-10-0001-03	Rosegreen Landfill Ltd	Tipperary County Council
WFP-T-10-0008-02	Southern 4x4 Breakers Ltd	Tipperary County Council
WFP-T-11-0001-03	Clonmel Waste Disposal Ltd	Tipperary County Council
WFP-TS-11-0004-02	Frank Wyse	Tipperary County Council
WFP-T-16-0001-01	Midland Scrap Metal Company Ltd	Tipperary County Council
COR-T-11-0005-02	Liam Guilfoyle & Liam Guilfoyle Jr	Tipperary County Council
COR-T-17-0001-01	Falconhurst Ltd	Tipperary County Council
WFP-T-12-0001-03	Phelan Skip Hire and Waste Management Ltd.	Tipperary County Council
COR-T-17-0002-01	Emerald Waste Company Ltd	Tipperary County Council
WFP-T-16-0004-01	Falconhurst Ltd	Tipperary County Council
WFP-T-16-0003-01	S.D.S.I. Ltd	Tipperary County Council
WFP-T-16-0002-01	Michael Bailey	Tipperary County Council
WFP-TS-11-0003-05	Metal Spectrum Ltd	Tipperary County Council
WFP-T-15-0001-01	Roadstone Ltd	Tipperary County Council
WFP-T-11-0005-03	Michael Bailey	Tipperary County Council
WFP-T-17-0003-01	Ryans Cleaning Event Specialists Ltd	Tipperary County Council
WFP-TN-12-0002-03	Naylor Car Dismantlers Ltd	Tipperary County Council

Authorisation No.	Name of Facility	Local Authority
COR-T-09-0001-03	Seamus Walsh Plant Hire Ltd	Tipperary County Council
WFP-T-18-0001-01	Gurteen Agricultural College	Tipperary County Council
WFP-T-13-0001-02	Killeenyarda Construction Ltd	Tipperary County Council
COR-T-19-0003-01	Golden Agri Services Ltd	Tipperary County Council
WFP-T-19-0002-01	English Tarmac Ltd	Tipperary County Council
WFP-TS-12-0002-05	Quality Recycling Ltd	Tipperary County Council
WFP-T-17-0001-02	Pride Point Ltd	Tipperary County Council
WFP-T-19-0003-01	Seamus Walsh Plant Hire Ltd	Tipperary County Council
COR-T-19-0004-01	MacQuarie Unlimited Company	Tipperary County Council
WFP-TS-09-0085-03	Michael Doyle	Tipperary County Council
WFP-TN-09-0009-03	Donie Comerford	Tipperary County Council
COR-T-20-0002-01	Enva Organics Ltd.	Tipperary County Council
WFP-T-09-0089-03	Michael O'Neill & Breda O'Neill	Tipperary County Council
WFP-TS-10-0002-06	OD Agri Ltd	Tipperary County Council
COR-T-20-0001-01	Golden Agri Services	Tipperary County Council
COR-T-21-0002-01	Tom and Damien Byrne	Tipperary County Council
COR-T-21-0005-01	BIGbin Waste Tech Ltd.	Tipperary County Council
COR-T-21-0006-01	BIGbin Waste Tech Ltd.	Tipperary County Council
WFP-T-12-0003-04	Derryville Environmental Solutions Ltd	Tipperary County Council
WFP-T-21-0001-01	Edmund (Ned) Morris)	Tipperary County Council
WFP-T-20-0002-01	Pure Oil Ltd.	Tipperary County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
COR-T-16-0001-02	Williams Sand & Gravel Ltd	Tipperary County Council
COR-T-19-0001-02	Mulcahy Construction Ltd	Tipperary County Council
WFP-T-11-0002-03	South Tipperary Cooperative Farm Relief Services Ltd.	Tipperary County Council
COR-T-21-0007-01	Phelan Skip Hire and Waste Management Ltd	Tipperary County Council
WFP-T-19-0001-02	Bord na Mona Recycling Ltd.	Tipperary County Council
WFP-T-20-0001-02	Andy Fogarty Sand and Gravel Ltd.	Tipperary County Council
WFP-WCCC-16-0003-02	John O'Brien	Waterford City and County Council
WFP-WCCC-15-0002-01	Richard Nugent	Waterford City and County Council
WFP-WCCC-16-0004-02	Mr. Jim & Sean Moroney	Waterford City and County Council
WFP-WCCC-16-0005-01	Eamonn Halpin	Waterford City and County Council
WFP-WCCC-18-0001-01	Donnacha Rua Taverns Co. Ltd	Waterford City and County Council
COR-WCCC-18-0002-01	Tommy Farrell & Sons (Garages) Ltd	Waterford City and County Council
COR-WCCC-18-0003-01	Middlethird Estates Ltd	Waterford City and County Council
COR-WCCC-18-0004-01	Kollect on Demand Ltd	Waterford City and County Council
COR-WCCC-16-0006-02	John Kirwan	Waterford City and County Council
WFP-WCCC-18-0005-01	John Morrison	Waterford City and County Council
WFP-WCCC-18-0004-01	Kereen Quarries Ltd	Waterford City and County Council
COR-WCCC-16-0005-02	Tony Kirwan Civil Engineering Contractors Ltd	Waterford City and County Council
WFP-WCCC-18-0006-01	Friends of the Earth (Skip & Fuels) Ltd	Waterford City and County Council
COR-WCCC-18-0007-01	Enva Ireland Ltd	Waterford City and County Council
WFP-WCCC-19-0001-01	Michael Shanahan	Waterford City and County Council

Authorisation No.	Name of Facility	Local Authority
WFP-WCCC-17-0003-02	John McNamara	Waterford City and County Council
COR-WCCC-19-0002-01	Eddie Power (JCB Hire) Ltd.	Waterford City and County Council
COR-WCCC-18-0006-01	Pascal O'Connell	Waterford City and County Council
COR-WCCC-19-0003-01	Dungarvan Golf Club	Waterford City and County Council
WFP-WCCC-19-0003-01	James Cahill	Waterford City and County Council
WFP-WCCC-19-0004-01	Thomas Phelan	Waterford City and County Council
COR-WCCC-19-0005-01	Roy & Andrew McCarthy Ltd	Waterford City and County Council
COR-WCCC-19-0004-01	Edward Kirwan	Waterford City and County Council
COR-WCCC-20-0001-01	Noel Frisby Construction Ltd	Waterford City and County Council
COR-WCCC-20-0002-01	Noel Frisby Construction Ltd	Waterford City and County Council
COR-WCCC-20-0003-01	Tony Kirwan Civil Engineering Contractors Ltd	Waterford City and County Council
WFP-WCCC-20-0001-01	Horsom Contracting Ltd	Waterford City and County Council
COR-WCCC-20-0004-01	Kollect on Demand Ltd.	Waterford City and County Council
COR-WCCC-19-0001-03	Noel Frisby Construction Ltd	Waterford City and County Council
COR-WCCC-20-0005-01	Richard Barron	Waterford City and County Council
WFP-WCCC-16-0002-03	Michael Murphy and Gavin Rees	Waterford City and County Council
COR-WCCC-21-0002-01	DFL Construction Ltd.	Waterford City and County Council
COR-WCCC-21-0001-01	Richard Barron	Waterford City and County Council
WFP-WCCC-21-0001-01	James Cahill	Waterford City and County Council
WFP-WCCC-21-0002-01	Tony Kirwan Civil Engineering Contractors Ltd.	Waterford City and County Council
WFP-WCCC-18-0002-02	Richard Barron	Waterford City and County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-WM-2010-0001-02	G&J O'Neill Enterprises	Westmeath County Council
WFP-WM-2015-0002-01	JD Car Dismantlers Ltd	Westmeath County Council
WFP-WM-2016-0005-01	Liam Ward	Westmeath County Council
WFP-WH-2016-0002-01	Hamill Rentals Ltd	Westmeath County Council
WFP-WM-2016-0004-01	Barna Waste Ltd (Athlone Facility)	Westmeath County Council
WFP-WM-2016-0006-01	Morgan Aggregates Ltd	Westmeath County Council
WFP-WH-2017-0100-00	Athcast Ltd	Westmeath County Council
WFP-WH-2018-0102-00	P Cross Earthworx Ltd	Westmeath County Council
WFP-WH-2018-0105-00	KPA (Ballinalack Limited)	Westmeath County Council
WFP-WH-2019-0106-00	Liam Ward	Westmeath County Council
COR-WH-2018-0104-00	PJ McLoughlin & Sons Ltd	Westmeath County Council
WFP-WH-2018-0103-00	Derryarkin Motocross Ltd.	Westmeath County Council
WFP-WH-2019-0107-00	Auto Euro Parts Ltd.	Westmeath County Council
WSSR-WM-2017-001	SEDE Ireland	Westmeath County Council
WFP-WM-2014-02-00	Ganly Motors Ltd	Westmeath County Council
WFP-WH-2019-0108-00	Matthew McMahon	Westmeath County Council
WFP-WH-2019-0110-00	Flamers Limited	Westmeath County Council
WFP-WH-2021-0011-00	John Gannon Concrete Ltd.	Westmeath County Council
WFP-WH-2021-0005-00	Chris Lynch Waste Management Limited	Westmeath County Council
COR-WH-2019-0111-00	Tyrrellspass GAA Club	Westmeath County Council
COR-WH-2019-0109-01	Multyfarnham GAA	Westmeath County Council

Authorisation No.	Name of Facility	Local Authority
COR-WH-2020-0112-00	Shandonagh GAA	Westmeath County Council
TWA-WH-2020-0113-00	Automatic Robotic Electrical and Electronic Recovery Associates	Westmeath County Council
WSSR-WM-2020-001	Enva Organics Ltd.	Westmeath County Council
COR-WH-2020-0114-00	Michael Byrne	Westmeath County Council
COR-WH-2021-0006-00	Martin McKeon	Westmeath County Council
COR-WH-2021-0002-00	Michael Newman	Westmeath County Council
COR-WH-2021-0003-00	Horseleap Streamstown Community Association	Westmeath County Council
WFP-WH-2021-004-00	The Hammond Lane Metal Company Ltd	Westmeath County Council
WFP-WH-2021-0007-00	Michael Dolan	Westmeath County Council
COR-WH-2021-0010-00	Aghard Properties Limited	Westmeath County Council
COR-WX-15-0086-01	R & W Kelly Limited	Wexford County Council
COR-WX-14-0079-01	J. Ryan Haulage Ltd	Wexford County Council
WFP-WX-15-0089-01	Sutton Plant Hire (Wexford) Limited	Wexford County Council
WFP-WX-16-0098-01	Sutton Plant Hire (Wexford) Limited	Wexford County Council
WFP-WX-16-0102-01	Molloy Metals Recycling Limited	Wexford County Council
WFP-WX-16-0104-01	Newtown Sand & Gravel Limited	Wexford County Council
WFP-WX-16-0105-01	James Tompkins (Garage) Ltd	Wexford County Council
COR-WX-16-0117-01	Biogrease Solutions Ltd	Wexford County Council
WFP-WX-16-0111-01	Malcolm Rothwell	Wexford County Council
WFP-WX-16-0116-01	Hudson Concrete Ltd	Wexford County Council
WFP-WX-16-0114-01	Wexford Car Dismantlers	Wexford County Council



## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-WX-16-0121-01	Ire-Wel Pallets Ltd	Wexford County Council
WFP-WX-17-0126-01	MSK Silversands Ltd	Wexford County Council
WFP-WX-17-0127-01	Rothwell Contracting Ltd	Wexford County Council
WFP-WX-16-0103-01	Anthony Byrne and Francis Byrne	Wexford County Council
WFP-WX-17-0123-01	Sammon Contracting Ireland Ltd	Wexford County Council
WFP-WX-17-0124-01	Sutton Plant Hire (Wexford) Ltd	Wexford County Council
WFP-WX-17-0125-01	Sutton Plant Hire (Wexford) Ltd	Wexford County Council
COR-WX-17-0131-01	Hennessy Plant Hire	Wexford County Council
COR-SS-WX-16-0106-01	Enva Ireland limited	Wexford County Council
COR-WX-16-0118-03	Hennessey Plant Hire	Wexford County Council
WFP-WX-17-0134-01	R & W Kelly Ltd	Wexford County Council
COR-WX-18-0135-01	Ardinagh Construction & Waste Ltd	Wexford County Council
WFP-WX-18-0141-01	Shane Cadogan Plant & Civil Engineering	Wexford County Council
COR-WX-18-0137-01	BAM Civil Ltd	Wexford County Council
WFP-WX-18-0143-01	Tamer Metal Recycling Ltd	Wexford County Council
WFP-WX-18-0142-01	Michael Murphy	Wexford County Council
WFP-WX-18-0140-01	Donohoe Motor Salvage Ltd	Wexford County Council
COR-WX-18-0139-01	Measure 2 Build Ltd	Wexford County Council
COR-WX-16-0115-04	Murphy Recycling & Aggregates Ltd	Wexford County Council
COR-WX-18-0144-01	Hennessy Plant Hire	Wexford County Council
COR-WX-18-0147-01	Environmental Compaction Systems (ECS) Limited	Wexford County Council

Authorisation No.	Name of Facility	Local Authority
WFP-WX-17-0129-02	M&T Plant Hire Limited	Wexford County Council
COR-WX-19-0152-01	Kollect on Demand Ltd	Wexford County Council
WFP-WX-19-0151-01	Pure Oil Limited	Wexford County Council
COR-WX-19-0153-01	Bizzy Binz Ltd	Wexford County Council
COR-WX-19-0155-01	Sean Kinsella Site Developments Ltd	Wexford County Council
COR-WX-19-0150-01	Kollect on Demand Ltd	Wexford County Council
COR-WX-19-0149-01	Environmental Compaction Systems Ltd	Wexford County Council
COR-WX-19-0157-01	Environmental Compaction Systems Ltd	Wexford County Council
WFP-WX-19-0158-01	Ned Murphy Tractors Ltd	Wexford County Council
WFP-WX-19-0160-01	WRM Investments Ltd	Wexford County Council
WFP-WX-19-0159-01	WCDA Recycling 2000	Wexford County Council
COR-WX-19-0162-01	Kollect On Demand Ltd	Wexford County Council
COR-WX-19-0163-01	Environmental Compaction Systems Ltd	Wexford County Council
COR-WX-19-0164-01	Environmental Compaction Systems Ltd	Wexford County Council
COR-WX-19-0165-01	C&D Recycling Kavanagh Ltd	Wexford County Council
COR-WX-19-0167-01	Kollect on Demand Ltd	Wexford County Council
WFP-WX-19-0168-01	Andrew Byrne	Wexford County Council
WFP-WX-20-0173-01	Sean Kinsella Site Developments Ltd	Wexford County Council
COR-WX-20-0171-01	Doyle's Garage Courtown Ltd.	Wexford County Council
WFP-WX-20-0172-01	Drumderry Aggregate Ltd	Wexford County Council
WFP-WX-20-0174-01	R&E Warren Quarry Ltd	Wexford County Council

## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-WX-20-0176-01	Johnny Murphy	Wexford County Council
WFP-WX-20-0177-01	Patrick Skelton	Wexford County Council
WFP-WX-20-0017-03	Mulligan Dismantling & Salvage Ltd.	Wexford County Council
WFP-WX-20-0012-03	Ardinagh Construction & Waste Ltd	Wexford County Council
WFP-WX-20-0076-02	Bernard Byrne Combines Ltd	Wexford County Council
WFP-WX-20-0007-03	Ferrycarrig Autobody Repairs Ltd	Wexford County Council
COR-WX-20-0184-01	Niall Barry & Co. Ltd	Wexford County Council
WFP-WX-21-0181-01	Tamer Metal Recycling Ltd	Wexford County Council
WFP-WX-20-0178-01	Paul Lancaster Sales & Recovery Ltd	Wexford County Council
WFP-WX-20-0099-02	C&D Recycling Kavanagh Ltd	Wexford County Council
COR-SS-WX-19-0169-01	Enva Organics Ltd	Wexford County Council
COR-WX-19-0169-01	Joan O'Sullivan	Wexford County Council
WFP-WX-20-0175-01a	Ballyshannon Recycling Ltd	Wexford County Council
WFP-WW-10-0020-01	FRS Network (Wicklow)	Wicklow County Council
WFP-WW-15-0035-01	Ann Dempsey (Carrigmore landfill)	Wicklow County Council
WFP-WW-15-0036-01	OCAE Consultants Ltd	Wicklow County Council
WFP-WW-16-0038-01	T.P. & S. Delahunt Ltd	Wicklow County Council
WFP-WW-17-0039-01	Bolagh Sand and Gravel	Wicklow County Council
WFP-WW-10-0017-03	Ray Kavanagh	Wicklow County Council
COR-WW-17-0026-01	Kevin Dempsey	Wicklow County Council
WFP-WW-17-0040-01	Ger Devlin	Wicklow County Council

Authorisation No.	Name of Facility	Local Authority
WFP-WW-18-0043-01	Packaging Laundry Ltd	Wicklow County Council
WFP-WW-18-0042-01	TP and S Delahunt Ltd	Wicklow County Council
WFP-WW-18-0041-01	Marrakesh Ltd	Wicklow County Council
WFP-WW-17-0003-04	Cullen Excavations Ltd	Wicklow County Council
WFP-WW-18-0045-01	Restwing Trading Ltd	Wicklow County Council
WFP-WW-18-0046-01	Derek Byrne Construction Ltd	Wicklow County Council
COR-WW-18-0029-01	Veolia Water Ireland Ltd	Wicklow County Council
WFP-WW-11-0023-02	Plazamont Ltd	Wicklow County Council
WFP-WW-18-0047-01	Delahunt Plant Hire	Wicklow County Council
COR-WW-18-0032-01	Dempsey Sand & Gravel Ltd	Wicklow County Council
WFP-WW-19-0052-01	Dempsey Sand & Gravel Ltd	Wicklow County Council
WFP-WW-19-0051-01	TSD Drumclay Ltd	Wicklow County Council
WFP-WW-19-0053-01	Ray Kavanagh	Wicklow County Council
WFP-WW-19-0049-01	TSD Drumclay Ltd	Wicklow County Council
WFP-WW-19-0055-01	Peter Corrigan	Wicklow County Council
WFP-WW-19-0054-01	William Stephenson	Wicklow County Council
WFP-WW-19-0056-01	Ground Reclamation Ltd	Wicklow County Council
COR-WW-20-0033-01	Ger Devlin Haulage & Plant Hire Ltd	Wicklow County Council
WFP-WW-09-0014-06	Multimetals Recycling Limited	Wicklow County Council
WFP-WW-19-0057-01	Scrathnagh Developments Ltd	Wicklow County Council
WFP-WW-20-0061-01	TSD Drumclay Ltd	Wicklow County Council



## Local Authority Authorised Waste Facilities (Cont'd)

Authorisation No.	Name of Facility	Local Authority
WFP-WW-20-0062-01	Ger Devlin Haulage & Plant Hire	Wicklow County Council
WFP-WW-20-0060-01	Maguire Enterprises Ltd.	Wicklow County Council
WFP-WW-13-006-04	Leon Recycling Ltd	Wicklow County Council
WFP-WW-14-0008-04	Richard Page & Dermot Page	Wicklow County Council
WFP-WW-16-0037-02	David Doyle	Wicklow County Council
WFP-WW-21-0064-01	S.U. Autoparts	Wicklow County Council
WFP-WW-21-0066-01	M Smith Haulage & Sons Limited.	Wicklow County Council
COR-WW-20-0035-01	Tinahely Community Area Projects Ltd.	Wicklow County Council
COR-WW-21-0036-01	Shannon Valley Plant Hire	Wicklow County Council
WFP-WW-21-0067-01	Herbie Stephenson Ltd.	Wicklow County Council
WFP-WW-21-0065-01	TSD Drumclay Ltd	Wicklow County Council
WFP-WW-21-0063-01	Hanley Removals Ltd.	Wicklow County Council
WFP-WW-21-0068-01	John Lawless	Wicklow County Council



# APPENDIX 7

## Inventory of EPA Authorised Waste Sites



## EPA Authorised Waste Facilities

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Pfizer Ireland Pharmaceuticals (Ringaskiddy)	P0013	Active	R02	Solvent reclamation/regeneration	1,218
Medite Europe Designated Activity Company	P0027	Active	R01	Wood biomass as fuel to generate heat energy	32,814
Irish Cement Limited (Platin)	P0030	Active	R01	SRF	119,986
College Proteins Unlimited Company	P0037	Active	R03	Rendering	2,793
C.J. Sheeran Limited	P0337	Active	R03	Pallet Recovery	22,141
Metal Processors Limited	P0401	Active	R04	Scrap lead loaded into smelt kettle, mixed metals and drosses removed. Molten lead pumped into refining kettle and lead refined to EN12588, pumped into moulds and cooled to produce refined lead. Drosses taken from refining kettle shipped abroad under TFS regulations for final recovery.	12,641
P Carney Limited	P0402	Active	R04	Recycling/reclamation of metals via mechanical and thermal processes to produce ingots and/or granules.	8,073
Future Pigs Limited	P0420	Active	R03	Anaerobic digestion	16,882
Breedon Cement Ireland Limited	P0487	Active	R01	Thermal energy recovery	82,957
Boliden Tara Mines Limited	P0516	Active	R11	Used as construction material in Stage 6 Tailings Storage Facility	417,573
Saint-Gobain Construction Products (Ireland) Limited	P0519	Active	R05	Recycled and recovered on site	1,812
Lakeland Dairies Co-Operative Society Limited	P0798	Active	D08	Aerobic waste water treatment plant	143,271
Green Biofuels Ireland Limited	P0829	Active	R03	Converted to biodiesel through a trans-esterification process	3,192
Irish Biofuels Production Limited	P0950	Active	R09	Production of Biodiesel from cooking oil	20,700
Timoleague Agri Gen Limited	P0986	Active	R03	Anaerobic Digestion	29,312

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Huntstown Bioenergy Limited	P0993	Active	R03	Thermal & Pressure Sterilisation prior to Anaerobic Digestion	6,432
The Hammond Lane Metal Company Limited	P0997	Active	R04	Depollution and shredding	25,411
The Hammond Lane Metal Company Limited	P1002	Active	R04	Shredding	39,345
Glenmore Generation Limited	P1004	Active	R03	Anaerobic Digestion	49,462
Galway Metal Company Limited	P1006	Active	R04	Cleaned, sorted, sheared, baled for export	79,721
Waddock Composting Facility Designated Activity Company	P1009	Active	R03	In vessel composting	11,609
Drogheda Port Company (Tom Roes Point Port Terminal)	P1011	Active	D10	None	36,187
Enrich Environmental Limited	P1013	Active	R03	Windrow Composting	49,888
Padraig Thornton Waste Disposal Limited	P1014	Active	R13	Mechanical sorting	23,037
Glanway Limited	P1015	Active	R12	Material Mechanically Processed by removing Organic Fines, Ferrous and Non-Ferrous Metals, PET, HDPE and Plastic Film	108,025
Dublin Port Company	P1022	Active	R05	The ex-situ treatment by stabilisation/solidification and recovery of contaminated dredge material at by infilling at two locations within the Dublin Port area, at Graving Dock No. 2 and at Berths 52/53, as part of the Alexandra Basin Redevelopment Project at Port Centre, Alexandra Road, Dublin Port, Dublin 1.	90,164
KMK Metals Recycling Limited	P1076	Active	R04	Baling steel	2,830
Ballymount Baling Station	W0003	Active	R13	Transferred for treatment	208,778

## EPA Authorised Waste Facilities (Cont'd)

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Clonakilty Waste Transfer Station	W0008	Active	D15	Accepted and stored waste pending onward transfer	1,478
Ballymurtagh Landfill Facility	W0011	Active	R13	Collection prior to onward shipment.	388
Kinsale Road Landfill	W0012	Active	D13	No treatment onsite. Waste is collected and transferred offsite.	3,640
Silliot Hill Landfill	W0014	Active	R05	Glass Recycling	45,344
Ballyogan Landfill Facility Ballyogan Recycling Park	W0015	Active	R05	N/A	10,398
Gortadroma Landfill Site	W0017	Active	D13	Waste accepted from members of the public only and transferred off site	389
Kilbarry Landfill Site	W0018	Active	R03	Dry recycling	1,248
Scotch Corner Landfill	W0020	Active	R13	Bulking up and storage prior to transfer to next destination	11,581
Derrinnumera Landfill Facility	W0021	Active	R12	Zero waste treatment on the site. All waste is transferred without treatment.	1,908
East Cork Landfill Site	W0022	Active	R02	Fluorescent tube recycling	3,526
Raffeen Landfill Site	W0023	Active	R13	Storage for transfer	5,611
Powerstown Landfill Site	W0025	Active	R13	Bulking up of material for transportation off site	2,825
Kyletalesha Landfill	W0026	Active	R12	Collection, Storage and Transfer for further Processing	31,166
Pollboy Landfill Facility - Ballinasloe Town Council	W0027	Active	D15	N/A	487
Derryclure Landfill	W0029	Active	R13	Storage at Civic Amenity Site	9,327
Dunmore Landfill	W0030	Active	D14	N/A	4,597
Dungarvan Waste Disposal Site	W0032	Active	R05	Taken offsite for re-use	4,066
Drogheda Landfill - Drogheda Borough Council	W0033	Active	R05	Waste transferred for disposal or recovery	2,793
Dundalk Landfill & Civic Waste Facility - Dundalk Town Council	W0034	Active	R03	Garden (green) waste is composted	5,252
Indaver Ireland Limited (Tolka Quay Road), Dublin Port	W0036	Active	D15	Waste is sent for onward treatment	16,337

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Starrus Eco Holdings Limited (Ballymount)	W0039	Active	R13	Bulked for transfer	133,531
Enva Ireland Limited (Shannon)	W0041	Active	D09	Physico chemical treatment	17,869
Thorntons Recycling Centre (Ballyfermot)	W0044	Active	R13	Storage of waste pending any of the operations numbered R1 to R12	249,257
Key Waste Management Limited	W0045	Active	R12	Storage before transfer	61,648
Kilmurry South	W0048	Active	R05	recovery/reclamation of inorganic material	48,734
Clonbulloge Ash Repository	W0049	Active	D01	Landfill	26,090
Veolia Environmental Services Technical Solutions Ltd, Corrin, Fermoy, Cork	W0050	Active	R13	Storage	28,301
Starrus Eco Holdings Limited (Fassaroe)	W0053	Active	R13	N/A	197,767
SRCL Limited (Kylemore Road) trading as Eco-Safe Systems Ltd, Allied Industrial Estate, Kylemore Road, Dublin 10	W0054	Active	R13	Storage and treatment	8,707
SRCL Limited	W0055	Active	D09	Waste was received as EWC 18 01 and 18 02 , waste is reclassified after processing to EWC 19 02 03. Waste is transferred from site to 3rd party to be used as fuel for Waste to Energy facility.	11,610
Starrus Eco Holdings Limited (Sligo)	W0058	Active	R13	N/A	16,945
Ballaghaderreen Landfill	W0059	Active	R13	Storage of waste pending collection	355
Rampere Landfill	W0066	Active	R13	Storage pending collection	290
Rathroeen Landfill	W0067	Active	R13	Civic amenity waste from public and waste from Ballina MD area	50,372
Youghal Landfill	W0068	Active	R09	Re-use	2,025
Milltown Transfer Station	W0069	Active	R13	Transferred off site by Licenced Waste Operator	1,953

## EPA Authorised Waste Facilities (Cont'd)

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Coolcaslagh Transfer Station	W0072	Active	R13	Removed off site in skip by Licenced Waste Operator	1,594
Roscommon Landfill Facility	W0073	Active	R13	storage of waste pending collection	1,021
Donohill Landfill	W0074	Active	R04	Aluminium drinks cans and Steel food can collected for recycling	754
Tramore Waste Disposal Site	W0075	Active	D01	Disposal of street sweepings	37
Corranure Landfill	W0077	Active	D15	these waste are accepted at the CA site, they are not treated onsite, and the "transfers of these waste" will be detailed in the waste accepted tab	17,050
Starrus Eco Holdings Limited (Dock Road)	W0082	Active	R12	N/A	122,334
Kenmare Transfer Station	W0086	Active	R13	Transferred off site in skips by Licenced Waste Operator	1,136
Caherciveen Transfer Station	W0087	Active	R13	Collected in skips from site by Licenced Waste Operator	829
Derryconnell Landfill	W0089	Active	D15	Acceptance & storage pending onward transfer	1,006
Safety Kleen Ireland Ltd	W0099	Active	R02	Solvent reclamation	212
Bord Na Móna Recycling Limited	W0104	Active	R13	Waste is mechanically treated and baled	52,567
Bruscar Bhearna Teoranta (Carrowbrowne)	W0106	Active	R03	Processed Compost Product	155,600
Inagh Landfill	W0109	Active	R12	Collection, Storage and Transfer to Licensed or Permitted Facility for Further Treatment	3,307
KMK Metals Recycling Limited	W0113	Active	R04	N/A	25,840
Soltec (Ireland) Limited	W0115	Active	R02	Distillation	2,641
Starrus Eco Holdings Limited (Butlerstown)	W0116	Active	R13	N/A	24
Integrated Materials Solutions Limited Partnership	W0129	Active	R05	Grading and Crushing Concrete	541,987
Bord Na Móna Recycling Limited	W0131	Active	R13	Bulking up.	76,314

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Starrus Eco Holdings Limited (Munster)	W0136	Active	R13	N/A	98,477
Starrus Eco Holdings Limited (Slane)	W0140	Active	R12	Bulking	205,465
Macroom Civic Amenity Site	W0142	Active	D01	Waste was not treated on site	2,486
Oxigen Environmental (Coes Road)	W0144	Active	R13	Bulked	58,629
Enva Ireland Limited (Cork)	W0145	Active	R13	Garage oil	2,110
Knockharley Landfill	W0146	Active	D05	Waste disposed of in Landfill	205,194
Ashgrove Recycling	W0147	Active	R13	Sorting, bulking	18,159
City Bin Co Ltd	W0148	Active	R13	Just temporary Storage no treatment	38,904
Oxigen Environmental (Robinhood)	W0152	Active	R13	Bulking for transfer	42,224
Ray Whelan Ltd	W0158	Active	R13	Storage prior to bulk transport of site for recycling	47,170
Castletownbere Waste Transfer Station	W0160	Active	R13	Acceptance & storage pending onward transfer	667
Bruscar Bhearna Teoranta (Ballaghadereen)	W0163	Active	R13	Recyclables are tipped onto the recycling shed floor any contaminants are removed prior to loading into ejector trailer for transfer to a recycling facility.	19,502
Ballynagran Residual Landfill	W0165	Active	R05	14,073t Recovered and 3,693.34t Disposed of in landfill	202,959
Galway Corporation Depot	W0166	Active	R13	Operations Numbered R1 - R12	1,937
Indaver Ireland Limited (Duleek)	W0167	Active	R01	Incineration, used as a fuel to generate energy	217,595
Mulleady's Limited (Drumlish)	W0169	Active	R13	Bulking before being transported for a final treatment	24,527
Lisdeen Recycling Centre & Transfer Station	W0170	Active	R12	Physical Processing and Recovery	797
Athy Civic Amenity Centre	W0175	Active	R13	Glass Recycling	1,552
Starrus Eco Holdings Limited (Waterford City)	W0177	Active	R12	N/A	53,961



## EPA Authorised Waste Facilities (Cont'd)

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
McGill Environmental Systems (Irl) Ltd	W0180	Active	R03	Composting of organic fines to produce a bio-stabilised waste	18,997
Starrus Eco Holdings Limited (Millenium Business Park)	W0183	Active	R12	Bulking	269,979
Enva Ireland Limited (Portlaoise)	W0184	Active	R13	Storage prior to removal of site	69,998
Rilta Environmental	W0185	Active	D15	Storage only	11,486
Starrus Eco Holdings Limited (Greenogue)	W0188	Active	R12	Bulked for transfer	34,399
Holmestown Waste Management Facility	W0191	Active	D10	Recovery	3,742
Rilta Environmental Limited	W0192	Active	R09	Oil dewatering	93,284
Bord Na Móna Recycling Limited	W0194	Active	R13	Waste is bulked and sent for recycling	37,547
Kilmainhamwood Compost	W0195	Active	R03	Mixing and composting	39,991
JFK Environmental Limited	W0196	Active	D09	Oil and water separated with the water going to sewer and oil stored in tank for transfer offsite.	35,364
Mulleady's Limited (Mullingar)	W0197	Active	R13	Bulking prior the transfer for recovery	37,741
Bord na Móna Plc (Kilberry)	W0198	Active	R03	Open windrow composting	32,238
Recycling Centre and Waste Transfer Station	W0200	Active	R13	Storage bulking for transfer	14,060
Green Circular Economy Unlimited Company	W0205	Active	R05	The paper and cardboard were transferred to a facility where they can be pulped and recycled.	155,349
Padraig Thornton Waste Disposal Ltd	W0206	Active	R13	Hand sorting	45,668
Cavan Waste Disposal Ltd	W0207	Active	R12	Bulking for transfer	23,932
Oxigen Environmental (Merrywell)	W0208	Active	R13	Bulking and Transfer	2,105
ERAS ECO Ltd	W0211	Active	R11	Anaerobic digestion	24,870
Ted O'Donoghue and Sons Limited	W0214	Active	R10	C&D	14,688

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Barna Waste Disposal Limited (Ardcolum)	W0216	Active	D15	Load into ejector trailer	19,910
Killarney Waste Disposal Unlimited Company	W0217	Active	R13	Separation	58,412
Kings Trees Services Composting Facility	W0218	Active	R03	Composting	1,949
Starrus Eco Holdings Limited (Gorey)	W0220	Active	R13	N/A	29,869
Bord Na Móna Recycling Limited	W0222	Active	R13	Bulking up.	92,473
Dingle Civic Amenity Centre	W0225	Active	R13	Waste collected in skips by Licenced Waste Operator	1,100
Padraig Thornton Waste Disposal Limited	W0227	Active	R13	R13 - Storage of waste pending any of the operations numbered R1 to R12	77,749
Bord Na Móna Recycling Limited	W0229	Active	R13	Storage	17,775
Dublin Waste to Energy Limited	W0232	Active	R01	Waste to Energy	599,975
Starrus Eco Holdings Limited	W0238	Active	R12	DMR sorted by mechanical separation and manual picking.	88,582
Bord Na Móna Recycling Limited	W0240	Active	R13	Bulked	25,923
Molaisin Compost Limited	W0245	Active	R03	Composting	6,449
Starrus Eco Holdings Limited (Littleton)	W0249	Active	R03	In vessel aerobic treatment	43,928
Clean (Irl) Refuse & Recycling Co.	W0253	Active	R13	Temporary storage	10,194
Walshestown Restoration Ltd	W0254	Active	R05	Recovery of materials onsite and in the form of backfilling	27,035
Country Clean Recycling Unlimited Company	W0257	Active	R13	Bulked stored	92,221
CHI Environmental Limited	W0260	Active	R05	Concrete processed under Article 28 application for the site and then stored onsite	30,183
Starrus Eco Holdings Limited (Cappagh)	W0261	Active	R12	Temp Storage	249,197

## EPA Authorised Waste Facilities (Cont'd)

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Irish Packaging Recycling	W0263	Active	R12	The facility is used as a baling station. The facility accepts predominantly source segregated paper, cardboard, plastic and hangers.	127,138
Hi-Volt Ireland Limited	W0267	Active	R13	Storage and transfer	1,860
Miltown Composting Systems Limited	W0270	Active	R03	Biological Treatment	51,365
Huntstown Inert Waste Recovery Facility	W0277	Active	R03	Inert soil and stone is taken in to the facility and used as backfill material to fill an exhausted quarry void.	1,492,200
Glassco Recycling Limited	W0279	Active	R04	Recycling metal packaging to end of life	136,999
Brownswood Inert Waste Recovery Facility	W0280	Active	R03	Inert soil and stone was used as backfill to restore quarry void.	194,749
O'Toole Composting Limited	W0284	Active	R13	Stored pending bulk transfer to appropriate offsite facility	43,202
Enva Ireland Limited	W0286	Active	R04	Recycling/reclamation of metals and metal compounds	615
Ormonde Organics Limited (Portlaw)	W0287	Active	R03	N/A	39,900
Forge Hill Recycling Unlimited Company	W0291	Active	R13	We sort and separate and bale waste into separate fractions	94,945
N&C Enterprises Limited	W0292	Active	R05	Recovery of Soils in the form of Backfilling	216,547
Kildare Sand & Gravel Limited	W0295	Active	R05	Soil recovered for restoring a previously existing quarry to natural ground.	166,129
Kilsaran Concrete Unlimited Company	W0296	Active	R05	N/A	352,094
Kilsaran Concrete	W0300	Active	R05	N/A	47,016
Packaging Laundry Limited	W0304	Active	R03	Empty plastic containers are washed for re-use	59
Behans Land Restoration Limited	W0247-01	Active	R05	Recovery of Soils in the form of Backfilling	342,823
Tulligmore Quarry Solutions Limited	W0255-01	Active	R05	Recovery of Soils in the form of Backfilling	-
Lennon Quarries Limited	W0256-02	Active	R05	Recovery of Soils in the form of Backfilling	4,815

Facility Name	Licence No.	Operational Status	Principal R/D code	Class of activity	2020 Waste Accepted on site
Milverton Waste Recovery, Roadstone Limited	W0272-01	Active	R05	Recovery of Soils in the form of Backfilling	-
Calary Quarry, Roadstone Limited	W0293-01	Active	R05	Recovery of Soils in the form of Backfilling	-



# Report on Legacy and Historic Landfills

Under the Waste Management Act 1996, Section 22(7)(h), the waste management plan is required to include an inventory of sites identified as previous waste disposal/recovery sites. An assessment of any risk of environmental pollution arising as a result of such activities as well as identifying the remedial action to be taken, is required.

To assist local authorities and other stakeholders with undertaking risk assessments, the EPA issued a Code of Practice for Environment Risk Assessment for Unregulated Waste Disposal sites in April 2007. The Code of Practice was produced to ensure a consistent approach to environmental risk assessments of unregulated waste disposal sites. The risk assessment methodology is a structured, transparent and practical process that allows for the ranking of the sites as high, moderate or low risk, known as Class A, B and C respectively.

Following on from the European Court of Justice (ECJ) Case (494-01) the then Minister for the Environment issued the Waste Management (Certification of Historic Unlicensed Waste Disposal and Recovery Activity) Regulations 2008, to specifically address the risk assessment and authorisation of Closed Landfills, which are defined in the Regulations as follows: "closed landfill" means a landfill site operated by a local authority for the recovery or disposal of waste without a waste licence on any date between 15 July 1977 and 27 March 1997 (i.e. prior to the entry into force of the Waste Management (Licensing) Regulations, 1997 (S.I. No. 133 of 1997)).

In 2008, the EPA established and hosted a register to allow local authorities to capture details of Closed Landfills and thereby fulfil their obligations under Regulation 5(3), and to assist Local Authorities in complying with Regulation 5(2) of the 2008 Regulations. This register (Historic Landfill Register) also allowed local authorities to enter details of illegal, private and pre 1977 landfill sites.

The Historic Landfill Register is now hosted by the NWCPO (since 2022) where it is managed as a live database, and is monitored and maintained by the Regional Historic Landfill Co-ordinators with support from NWCPO, and oversight from the EPA.

There are currently 499 landfill sites on the register. This is the total national figure, across each of the three waste regions. A breakdown of these landfill sites by category and by region is provided in **Table 1** below.

During the migration of the register from the EPA to the NWCPO, a comprehensive review of the sites listed was undertaken. The current risk rating of each site, as well as the current status of each site with respect to the stage that it is at in the risk assessment and remediation process, is recorded. A further detailed breakdown of the 499 sites on the register is provided in the sections below.

It should be noted that at the time of publication of the previous three RWMPs in 2015, the total number of sites reported as listed on the register was 508 (136 in CUR, 155 in EMR and 217 in SR). During the migration of the register, and as part of the review



## APPENDIX 8

### Report on Legacy and Historic Landfills

**Table 1 – Details of the sites listed on the Historic Landfill Register, by Category (January 2024)**

Region	Closed Landfills	Private / illegal Landfills	Pre 1977 Landfills	Total No. sites listed on the Historic Landfill Register
CUR	77	58	3	<b>138</b>
EMR	74	41	52	<b>167</b>
SR	125	38	31	<b>194</b>
<b>Total</b>	<b>276</b>	<b>137</b>	<b>86</b>	<b>499</b>



of the sites listed, it was identified that the summary table, in Appendix F of 2015 SR Plan, providing the total number of sites on the register inaccurately reflected the actual sites listed. The correct total for the SR is 194 and not 217, giving a total of 485 instead of 508.

Since the publication of the previous three RWMPs, 14 additional sites have been added to the register (2 in CUR & 12 in EMR), bringing the total number to 499. Note: In January 2024, 5 recently identified closed landfills were added to the register in accordance with Regulation 5(2) of the 2008 Regulations.

#### CLOSED LANDFILLS:

Under the Waste Management (Certification of Historic Unlicensed Recovery and Disposal Activity) Regulations 2008, a local authority must undertake an environmental risk assessment (ERA) of their Closed Landfills (in accordance with the EPA Code of Practice), identify any required remediation works and subsequently apply to the EPA for a Certificate of Authorisation (CoA). The local authority must then make all reasonable efforts to comply with any CoA issued to it by the EPA.

A breakdown of the Closed Landfills, on the Historic Landfill Register, by risk rating and by region is provided in **Table 2** below.

It should be noted that the comprehensive review carried out during the migration of the register also focussed on the categorisation of the sites. At the time of publication of the previous three RWMPs in 2015, the total number of Closed Landfills was recorded as 285 (78 in CUR, 77 in EMR and 130 in the SR). Following validation of the details entered onto the register by local authorities, a number of sites were re-classified. The number of Closed Landfills on the register is now 276.

**Table 2 - Details of the Closed Landfills, by Risk Rating, listed on the Historic Landfill Register (Jan. 2024<sup>1</sup>)**

Region	High Risk (Class A)	Moderate Risk (Class B)	Low Risk (Class C)	Not Risk Assessed	Total No. Closed Landfills
CUR	8	34	34	1	<b>77</b>
EMR	11	33	30	0	<b>74</b>
SR	21	45	59	0	<b>125</b>
<b>Total</b>	<b>40</b>	<b>110</b>	<b>121</b>	<b>1</b>	<b>276</b>

\* Note that the details provided in this table represent a snapshot in time; these numbers will change as sites are progressed through the ERA process over the plan implementation period.

In accordance with the roadmap developed under the previous RWMPs, Closed Landfills are prioritised for investigation and remediation based on the level of risk they pose to the environment and human health. A summary of the current status (January 2024) of the 276 Closed Landfills with respect to the ongoing advancement of these sites through the ERA and CoA process, is presented in **Table 3**.

It should be noted that as a site is advanced through the ERA process, the initial risk rating assigned may change as the availability of quantitative data enables a more informed assessment of the actual risk rating. The number of sites listed under each risk category in **Table 2**, reflects a snapshot in time and is continually changing as sites are progressed through the ERA process.

This Plan will ensure that all closed landfills will continue to be addressed in accordance with the established risk based approach.

**Table 3 – Details of the Closed Landfills by Current Status (January 2024<sup>1</sup>)**

Region	High Risk (Class A)			Moderate Risk (Class B)			Low Risk (Class C)			Not Risk Assessed
	No. at ERA Stage	No. CoA Application Submitted -Awaiting Final Decision	No. CoA Application Submitted - Final Decision Issued	No. at ERA Stage	No. CoA Application Submitted -Awaiting Final Decision	No. CoA Application Submitted - Final Decision Issued	No. at ERA Stage	No. CoA Application Submitted -Awaiting Final Decision	No. CoA Application Submitted - Final Decision Issued	No. at ERA Stage
CUR	1	3	4	26	4	4	32	2	0	1
EMR	2	6	3	21	6	6	24	5	1	0
SR	9	9	3	29	13	3	51	6	2	0
	<b>12</b>	<b>18</b>	<b>10</b>	<b>76</b>	<b>23</b>	<b>13</b>	<b>107</b>	<b>13</b>	<b>3</b>	<b>1</b>
<b>Total</b>		<b>40</b> (of which 28 CoAs submitted)			<b>112</b> (of which 36 CoAs submitted)			<b>123</b> (of which 16 CoAs submitted)		<b>1</b> (of which 26 CoA final decisions have issued, 54 CoA applications have been submitted and await a final decision & 196 CoA applications have still to be submitted)

\* Note that the details provided in this table represent a snapshot in time; these numbers will change as sites are progressed through the ERA and CoA process over the plan implementation period.

**Table 3** above illustrates that of the 276 Closed Landfills, 80 have concluded the ERA process and submitted a CoA application to the EPA, leaving 196 sites at varying stages of the ERA process.

Of the 80 sites that have submitted the CoA application, 26 have received a final decision from the EPA, and 54 are awaiting a final decision. Further details with respect to the 26 sites are presented in **Table 4** below.

At the time of publication of the previous RWMPs in 2015, only one CoA final decision had been issued. Since then the delay in processing CoAs was addressed and the EPA, with a dedicated resource in place, have issued a further 25 final decisions. 20 of these final decisions have been issued since 2019, which illustrates the significant progress that has been made during the latter years of the previous RWMPs, and sets the foundation for delivery under this Plan. As mentioned above, landfills are prioritised for investigation and remediation based on the level of risk they pose to the environment and human health. Whilst **Table 3** above indicates that a greater number of moderate risk sites have submitted CoA applications, than high risk sites (36 v

28 at time of writing), it should be noted that many of the sites that are currently designated as moderate risk in **Table 3**, were previously designated as high risk, and subsequently changed to moderate risk, as the assessment process advanced.

Of the 26 Closed Landfills that have received a CoA final decision, to date 7 have been fully remediated.

The remediation work at Closed Landfills is subject to the European Communities (Birds and Natural Habitats) Regulations 2011 (specifically Regulation 42(1)). Where the proposed remediation work is screened in for Appropriate Assessment, a local authority must apply to An Bord Pleanála for development consent for the remediation works.

For the 15 sites listed as requiring development consent, these are at varying stages in the preparation of the application to An Bord Pleanála.

Table 4 Details of the 26 Closed Landfills that have received their Final Decision CoA (January 2024\*)

Region	High Risk (Class A)			Moderate Risk (Class B)			Low Risk (Class C)		
	Remediated	Undergoing or Proceeding to Remediation	Require ABP Planning Consent	Remediated	Undergoing or Proceeding to Remediation	Require ABP Planning Consent	Remediated	Undergoing or Proceeding to Remediation	Require ABP Planning Consent
CUR	0	1	3	3	1	0	0	0	0
EMR	1	0	2	1	0	5	0	0	1
SR	1	0	2	1	1	1	0	1	1
	<b>2</b>	<b>1</b>	<b>7</b>	<b>5</b>	<b>2</b>	<b>6</b>	<b>0</b>	<b>1</b>	<b>2</b>
<b>Total</b>		<b>10</b>			<b>13</b>			<b>3</b>	
					<b>26</b>				

\* Note that the details provided in this table represent a snapshot in time; these numbers will change as sites are progressed through the ERA and remediation process over the plan implementation period.

**PRIVATE / ILLEGAL LANDFILLS:**

In addition to Closed Landfills, when it was established, the Historic Landfill Register allowed local authorities to enter details of illegal and private sites.

The EPA Code of Practice defines:

- Illegal landfills as those on which the unregulated disposal of waste took place without the required waste authorisation including privately operated sites in operation after the enactment of the European Communities (Waste) Regulations 1979 (S.I. No. 390 /1979).
- Private landfills as those private waste disposal facilities that were in operation in the period 15th July 1977 to 31st March 1980, without being in breach of national legislation i.e. prior to the enactment of S.I. No. 390 /1979.

The register records 137 of these sites with a breakdown per region provided in **Table 5**. A significant total of 87 of these have either been resolved or authorised, leaving a balance of 50 sites, which are at varying stages in the risk assessment and remediation process.

The 'resolved' category presented in **Table 5** relates to private or illegal sites that have already been resolved or remediated, and no further work is anticipated at this stage. These sites were resolved by either removing the waste off-site, containing the waste by installing a landfill cap, or whereby the

ERA concluded that there was negligible risk to the environment or human health and no further action was required.

The 'authorised' category presented in **Table 5** relates to private sites authorised under the Waste Management Act. These are/were permitted waste facilities and accordingly do not require any further ERA or regulation.

For the remaining 50 sites, **Table 5** summarises the risk rating as well as the status of these sites in terms of their advancement through the process.

This Plan will ensure that all of the private and illegal landfills will continue to be addressed in accordance with the established risk based approach.

**PRE 1977 LANDFILLS:**

In addition to Closed Landfills, plus private and illegal landfills, the Historic Landfill Register allowed local authorities to enter details of landfill sites which operated and closed prior to the 15th July 1977 i.e. prior to the Waste Framework Directive coming into force.

The register records 86 of these sites with a breakdown per region provided in **Table 6**. A total of 9 of these have either been resolved or authorised, leaving a balance of 77 sites, which are at varying stages in the risk assessment and remediation process.

Table 5 – Details of the Private/Illegal Landfills listed on the Historic Landfill Register (January 2024\*)

Region	Resolved	Authorised under WMA 1996	High Risk (Class A)		Moderate Risk (Class B)		Low Risk (Class C)		Not Risk Assessed
			No. Pending or at Remediation Stage	No. Pending or Under Investigation	No. Pending or at Remediation Stage	No. Pending or Under Investigation	No. Pending or at Remediation Stage	No. Pending or Under Investigation	
CUR	12	41	0	1	0	3	0	1	0
EMR	5	0	1	3	0	8	3	17	4
SR	29	0	0	1	0	1	0	4	3
	<b>46</b>	<b>41</b>	<b>1</b>	<b>5</b>	<b>0</b>	<b>12</b>	<b>3</b>	<b>22</b>	<b>7</b>
<b>Total</b>	<b>87</b>		<b>6</b>		<b>12</b>		<b>25</b>		
					<b>137</b>				

\* Note that the details provided in this table represent a snapshot in time; these numbers will change as sites are progressed through the ERA and remediation process over the plan implementation period.

The 'resolved' category presented in **Table 6** relates to sites that have already been resolved or remediated, and no further work is anticipated at this stage. These sites were resolved by either removing the waste off-site, containing the waste by installing a landfill cap or whereby the ERA concluded that there was negligible risk to the environment or human health and no further action was required.

The 'authorised' category presented in **Table 6** relates to sites that are within the boundary of a landfill authorised under the Waste Management Act, and accordingly do not require any further action under the programme.

For the remaining 77 sites, **Table 6** summarises the risk rating as well as the status of these sites in terms of their advancement through the process.

This Plan will ensure that all of the pre 1977 landfills will continue to be addressed in accordance with the established risk based approach.

**LANDFILL REMEDIATION PROGRAMME**

The Landfill Remediation Grant Programme was established in 2006 to risk assess, remediate and regularise the unregulated historic landfill sites. The Programme is administered by the Department of the Environment, Climate and Communications (DECC) as the funding body, national policy and legislative authority. There are four key stakeholders in managing the Programme each

with a specific role to play with the administration and implementation of the Programme including compliance with procurement, the EPA Code of Practice, the CoA process, national policy and the Public Spending Code, i.e.

- DECC
- Regional Waste Management Planning Offices (RWMPOs)
- Environmental Protection Agency
- Local Authorities.

The Programme is co-ordinated at a regional level through the RWMPOs by the Historic Landfill Co-ordinators (posts established in 2019). It is managed nationally through the Historic Landfill Remediation Steering group, which was established in 2019 and is chaired by DECC.

Within the Licencing Unit of the EPA, a dedicated resource for the processing of CoA applications has been in place since 2018. There is continual engagement between the Historic Landfill co-ordinators and the EPA, both the Licencing Unit, as well as the Office of Environmental Enforcement, to ensure that local authorities are informed of the various issues and developments with respect to CoA applications and subsequent compliance with same.



Table 6 – Details of the pre 1977 Landfills listed on the Historic Landfill Register (January 2024<sup>1</sup>)

Region	Resolved	Authorised under WMA 1996	High Risk (Class A)		Moderate Risk (Class B)		Low Risk (Class C)		Not Risk Assessed
			No. Pending or at Remediation Stage	No. Pending or Under Investigation	No. Pending or at Remediation Stage	No. Pending or Under Investigation	No. Pending or at Remediation Stage	No. Pending or Under Investigation	
CUR	2	0	0	0	0	0	1	0	0
EMR	4	0	0	1	0	5	2	24	16
SR	1	2	0	1	0	1	0	25	1
	<b>7</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>6</b>	<b>3</b>	<b>49</b>	<b>17</b>
<b>Total</b>	<b>9</b>		<b>2</b>		<b>6</b>		<b>52</b>		
					<b>86</b>				

\* Note that the details provided in this table represent a snapshot in time; these numbers will change as sites are progressed through the ERA and remediation process over the plan implementation period.

In 2021, the Historic Landfill Co-ordinators established a multi-party framework agreement for use by local authorities to procure consultants to undertake environmental risk assessments for unregulated landfills, in accordance with the EPA Code of Practice. Given the number of unregulated landfills requiring assessment, the framework was established to bring efficiencies for local authorities for the procurement of this work.

The role of the Historic Landfill Co-ordinators has also included the co-ordination of training and workshops for local authority staff involved in the management of unregulated landfills, and to date has involved training on the EPA Code of Practice, training on the use of the multi-party procurement framework, information session and site visit to a remediated landfill. The RWMPOs through the Historic Landfill Co-ordinators have prepared guidance for local authorities on the planning consent procedures for the remediation of closed landfills. The EPA Licencing Unit also has a role in training for the sector and delivered training on measurement of landfill gas at historic landfills and the closed landfill CoA process in March 2023.

The Landfill Remediation Grant Programme is the annual allocation of capital grants, by the DECC, in recognition of the financial burden on local authorities in carrying out the required risk assessment and remediation of unregulated historic

landfill sites. This Programme has been accelerated over the course of the previous RWMPs, with the DECC providing 100% funding for capital works since 2018.

The Programme was allocated €18.06m of funding in 2023 of which €8.14m was spent (€3.03m of which was spent on the remediation of the landfill site at Kerdiffstown in Co. Kildare). This reflects the growing momentum in the delivery of the programme which will be supported into the future with strengthened governance practices through the national steering group and the continued collaborative working to deliver the commitment in national policy.

The National Development Plan 2021 - 2030, sets out a commitment to funding the programme to 2030, which covers the course of this Plan (2023 - 2029).

Further detail with respect to progressing the Historic Landfill Remediation Programme over the course of this Plan, is provided in Volume II: Policy Responses & Actions, and Volume III: Delivery Roadmap.



## APPENDIX 9

### Guidance for Siting Waste Management Facilities



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# Abbreviations

AA	Appropriate Assessment
ATF	Authorised Treatment Facility
APC	Air Pollution Control
BAT	Best Available Technology
CAS	Civic Amenity Site(s)
CoR	Certificate of Registration
C&D	Construction and Demolition
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
ELVs	End of Life Vehicles
ELVES	End of Life Vehicle Environmental Services
EPA	Environmental Protection Agency
FRMP	Flood Risk Management Plan
IAS	Invasive Alien Species
IBA	Incinerator Bottom Ash
MBT	Mechanical Biological Treatment
MRF	Mechanical Recovery Facility
NHA	Natural Heritage Areas
pNHA	Proposed Natural Heritage Areas
NIS	Natura Impact Statement
PTU	Pay-to-Use
RDF	Residual Derived Fuel
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SAC	Special Area of Conservation
SID	Strategic Infrastructure Development
SRF	Solid Recovered Fuel
SuDS	Sustainable Urban Drainage System
WEEE	Waste Electrical Electronic Equipment
WFP	Waste Facility Permit

<sup>1</sup> Circular Economy and Miscellaneous Provisions Act 2022, Link: <https://www.irishstatutebook.ie/eli/2022/act/26/section/26/enacted/en/html>

# Definitions

**Advanced Thermal Treatments:** Systems that incorporate emerging technologies, using heat to decompose waste in limited oxygen prior to energy extraction. These systems include pyrolysis and/or gasification processes.

**Anaerobic Digestion:** The biological decomposition of biowaste in the absence of oxygen and under controlled conditions in order to produce biogas and digestate.

**Authorised Treatment Facility (ATF):** A facility at which the collection, the storage and the appropriate treatment and recovery of vehicles may take place.

**Biological Treatment Facilities:** Facilities that include composting, anaerobic digestion or other bio-processes for stabilising and sanitising biodegradable waste. The technology employed depends on the treatment approach.

**Bring Banks:** Receptacles in which members of the public deposit recyclable waste materials such as glass, metals and plastics in material specific receptacles for subsequent collection and delivery to material recovery facilities.

**Bring Facilities:** A facility of purpose-built receptacles in which segregated domestic wastes may be deposited by the public, provided in an area to which the public have access.

**Brownfield site:** Land previously used for industrial or commercial purposes with known or suspected pollution.

**Certificate of Registration (CoR):** A certificate issued under Article 37 of the Waste Management (Facility Permit and Registration) Regulations 2007 and, for the purposes of these Regulations, shall include a 'registration certificate' which has been granted as a waste authorisation by the Agency or, as the case may be, a local authority in accordance with the provisions, which regulates the reception, storage (including temporary storage), segregation, sorting or repackaging of waste.

**Civic Amenity Sites:** Reception facilities that enables householders to deposit a wide range of household waste, including recyclable and non-recyclable materials, bulky household waste and certain categories of household hazardous waste. Generally, these facilities are staffed.

**Gasification:** A process that converts organic or fossil based carbonaceous materials at elevated temperatures with controlled amounts of oxygen into carbon monoxide, hydrogen, carbon dioxide and methane.

**In-Vessel Composting:** Composting of biowaste in a closed reactor where the composting process accelerates by controlled and optimised air exchange, water content and temperature control.

**Materials Recovery Facility:** Facilities where recyclables are sorted into specific categories, processed and transported offsite to processors for remanufacturing.

**Mechanical Biological Treatment (MBT):** The treatment of residual municipal waste through a combination of manual and mechanical processing and biological stabilisation, to stabilise and reduce the mass of waste that requires disposal.

**Pay-to Use Banks (PTU):** These are compactor banks used for the collection of household residual, dry recyclable and food wastes. A charge is payable at the Pay to Use banks by the user prior to use.

**Pre-Treatment:** Operations such as dismantling, sorting, crushing, compacting, palletising, drying, shredding, conditioning, repackaging, separating, blending or mixing, if the material or substance resulting from such operations is still waste. These activities do not sit on any particular rung of the waste hierarchy and instead are precursors to specific types of treatment.

**Pyrolysis:** A thermochemical decomposition of organic material at elevated temperatures in the absence of oxygen. It involves the simultaneous change of chemical composition and physical phase. It is irreversible.

**Special Area of Conservation (SAC):** A site of Community importance designated by the Member States through a statutory, administrative and/or contractual act where the necessary conservation measures are applied for the maintenance or restoration, at a favourable conservation status, of the natural habitats and/or the populations of the species for which the site is designated.

**Special Protection Area (SPA):** A designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds.

**Thermal Recovery Activities:** Thermal based operations that sit on the 'other' recovery tier of the waste management hierarchy. It is a process where the principal means is to use waste as a fuel to generate energy. It is a waste management operation with energy recovery classified as R1 in Annex II of the Waste Framework Directive. Thermal recovery applications include wastetoenergy technologies such as incineration, pyrolysis and gasification. They also cover certain production processes which involve the cocombustion of wastes, thus substituting fuels, in cement kilns or industrial furnaces.

**Residential Properties:** includes private households, schools, creches or healthcare facilities with setback distances related to the nearest point of the building curtilage. For clarity a private household comprises either one person living alone or a group of people living at the same address with common housekeeping arrangements – that is sharing at least one meal a day or sharing a living room or sitting room.

**The Plan:** Refers to the National Waste Management Plan for a Circular Economy 2024-2030.

**Transfer Stations:** Facilities where waste is principally compacted or baled for removal offsite. Minor sorting of the material may take place on-site.

**Waste:** Any substance or object that the holder discards or intends or is required to discard by the Waste Framework Directive (2008/98/EC).

**Waste Facility Permit (WFP):** A permit issued by a local authority to a facility for the transfer, storage or treatment of waste under the Waste Management (Facility Permit and Registration) Regulations 2007, as amended.

**Waste Storage Facilities:** Facilities used for the acceptance and storage of waste on-site. It does not include temporary storage on the site where the waste is produced.

**Waste to Energy:** The process of creating energy – usually in the form of electricity or heat, but also potentially biofuels – from the thermal treatment of a waste source, via technologies such as incineration, anaerobic digestion, gasification or pyrolysis.

**Windrow Composting:** The composting of biowaste placed in elongated rows which are turned by mechanical means to increase the porosity of the heap and the homogeneity of the waste.

# 1 Introduction

Ireland's management of waste has evolved over many years. We have moved away from an over-reliance on landfill developing more sustainable treatment options such as reuse, recycling and recovery. The ambition of the Plan is to rethink our approach and view wastes as resources. Better use of our resources will deliver environmental, social and economic benefits.

The circular economy policy and legislative agenda is an opportunity to enhance development of our green economy. This change will see business systems transform to circular economic models to harness the longevity of resources in favour of linear make-take-disposal supply chains. This economic opportunity has the potential to create jobs and foster innovative solutions.

The principles of the circular economy form the strategic basis of the Plan. To grow a self-sufficient waste management system requires the development of balanced and sustainable waste infrastructure. The siting of waste facilities is the first step in building a robust long-term network of resilient infrastructure. Without guidance an inconsistent approach to the siting of waste management facilities may arise. Inappropriate siting of waste management facilities can have significant consequences for communities and environmental receptors and habitats.

Siting waste management facilities is challenging. A poorly chosen site can delay potential development or, in certain cases, be the reason a development is refused. European and Irish waste legislation require waste management plans to provide 'location criteria' for the siting of recovery and disposal facilities.

The strategic environmental assessment of the Plan identified the need for consistency in siting waste facilities to protect the environment and human health. This is addressed in policy TP11.1 of the Plan, which calls for the application of the waste facility siting guidance for all new infrastructure.

This guidance has been prepared to promote consistent siting. It is a good practice document to inform and guide the siting of future developments.

This guidance supports local planning authorities, An Bord Pleanála and other bodies when assessing and deciding on applications for planning approval. It also supports waste management organisations and project developers (including Local Authorities), when siting a new facility. For the purpose of

this document project developers include local authorities.

The roles of environmental regulatory bodies, specifically the EPA and the local authorities, in issuing facility waste authorisations, are not affected by the introduction of this guidance.

**It should be noted that there is scope to alter the siting criteria and guidance distances included in this document through appropriate planning conditions and/or mitigation measures at project level where it can be demonstrated that there is no significant adverse impact to human health or the environment.**

## 1.1 PLANNING CONTEXT

The objective of this guidance is to assist the planning process. In Ireland, planning and development is governed by a hierarchy of strategic frameworks and plans. The Plan is part of this structure. Its position in the context of national and regional planning policy is shown in **Figure 1-1**.

The highest tier of planning is Project Ireland 2040 National Planning Framework (NPF). This national document will guide high-level strategic planning and development for the country up to 2040, so population growth is sustainable (in economic, social and environmental terms).

The NPF along with the Project Ireland 2040 National Development Plan 2018-2027 set the context for each of Ireland's three regional assemblies to develop their Regional Spatial and Economic Strategies (RSES).

The RSES sit below the NPF linking national policies to the local authority City and County Development Plans ensuring national, regional and local plans align. The RSES aim to achieve sustained economic growth and development, throughout the three regional planning assemblies.

The city and county development plans govern local planning and development. By law, these statutory documents must include the policy objectives of the relevant waste management plan in force. The National Waste Management Plan for a Circular Economy sits on the same planning tier as the city and county development plans. Where a conflict arises between the objectives of the development plan and the national waste plan, the objectives of the waste plan take precedent over those of the development plan.



Figure 1-1 Irish Planning Framework Hierarchy

## 1.2 SCOPE

The scope of this document includes broad siting criteria (**Section 2**) and facility specific guidance (**Section 3**) for consideration when siting a waste facility. Guidance has been prepared for 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.

Other waste activities, not covered by the facilities listed above, may also need to take account of the general criteria (**Section 2**) at siting stage. Future revisions of this guidance document may expand the waste facilities covered in the scope. The siting of landfills, is addressed in the EPA Landfill Manual on Site Selection, published December 2006, and is outside of the scope of this guidance.

A comprehensive review of existing Irish and UK siting guidance was undertaken to take account of existing good practices and relevant findings. The list of documents reviewed is included in **Section 4**.

This document includes setback distances to neighbours (i.e. residential properties and businesses) and national roads, which are intended to guide the siting of activities. They balance economic and development considerations alongside planning, environmental and community concerns. There is scope to reduce the guidance distances through appropriate planning conditions and mitigation measures. For example, access distances can be extended – provided a project developer can demonstrate that the quality of roads accessing the planned location is suitable and potential impacts on the local community will be kept to a minimum.



### 1.3 SITE SELECTION PROCESSES

This guidance does not remove the need to implement a formal site selection process, which may be required to identify a suitable site location. Such a process may need to be followed when a preferred location is not known or where greenfield or unzoned lands are being considered for development.

Siting-significant waste treatment activities, such as thermal recovery facilities, typically follow a staged site selection process. This process eliminates unsuitable sites and demonstrates the suitability of a chosen location. The siting of other waste activities may also require such a process. For developments requiring environmental assessment, consideration of alternative sites needs to be demonstrated in accordance with Article 4 of the Environmental Impact Assessment Directives 2011/92/EU and 2014/52/EU.

Project developers are encouraged to contact their local authority or regional waste management office for further details on site selection procedures.

### 1.4 APPLYING THE NEW GUIDANCE

This guidance applies to new waste facilities submitted for planning after 1st January 2024. For relevant facilities, planning authorities and project developers (including Local Authorities) are to consider the general siting criteria and facility specific guidance. Applications lodged in advance of this date are exempt from the guidance, but legislative requirements under environment regulations require consideration of alternative sites. Revisions to existing waste facility planning permissions, lodged after 1st January 2024, are generally outside the remit of the guidance, in particular where there is no alteration to the boundary of the site.

Planning applications lodged for waste development at an existing site, which constitute a change of use at that site, are to take account of this guidance.

Similarly alterations to an existing site boundary, which extend the site footprint and propose to develop, a waste activity in the extension area, are to take account of this guidance.

For clarity this guidance does not apply to wastewater or water treatment plants.

## 2 General Siting Criteria

Siting is not simply a technical issue. It requires consideration of environmental, social, economic and other relevant policy issues. Active engagement with stakeholders equally needs consideration. Waste facilities have the potential to impact significantly on communities and the environment. This section outlines general siting criteria that developers should consider first. The siting criteria and specific facility guidance are linked, see **Figure 2-1**. The following general siting criteria for consideration are:

- **Environmental** risks, including potential for surface or groundwater pollution, air quality issues such as dust or odour, noise or vibration, light and transportation concerns.
- **Economic** issues, including its construction and operating costs and its impact on local industry.
- **Planning Considerations**, including (but not limited to):
  - Relevant National, Regional and Local planning policy contexts;
  - Specific site zonings (where designated) and associated uses 'permitted in principle', 'open for consideration' or 'not permitted';
  - Other designation (such as protected views, heritage considerations, landscape designations and environmental designations);
  - Adjacent existing land uses in particular sensitive uses which may be impacted in terms of noise, pollution, visual amenity and traffic;
  - Planning history review, i.e. existing (unconstructed) permitted adjacent developments;
  - Existing /future transportation infrastructure; and
  - Waste management planning aspects.
- **Social and other relevant policy** issues including health, aesthetics, alternative and future land use, responsibility for site management and local control.
- Additional issues may require consideration, depending upon local and regional conditions.

### 2.1 ENVIRONMENTAL CONSIDERATIONS

The plan includes a policy for the protection of the environment to guide the siting of waste management facilities. These are included in this section.

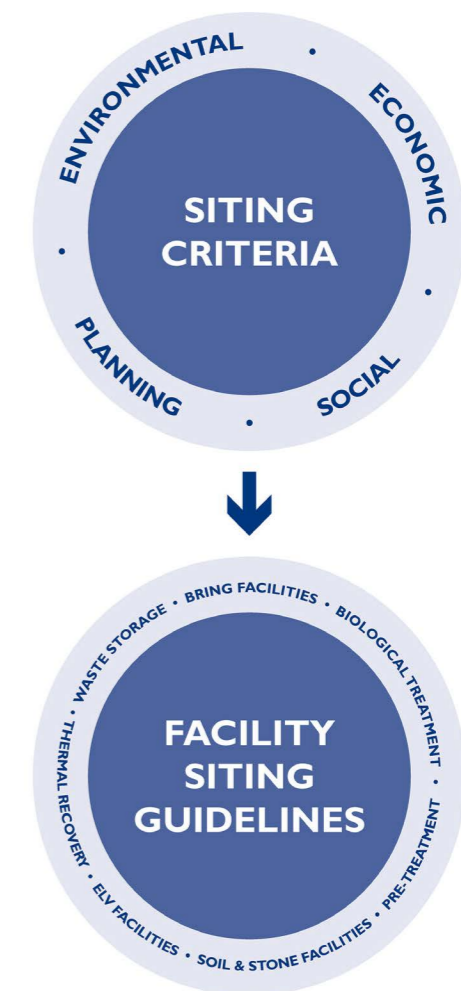


Figure 2-1 Linked Approach – Siting Criteria and Guidance

For ease of reference, the environmental protection criteria are divided into (1) general environment and (2) European Sites (SPAs and SACs). In general, future waste activities that require consent are to consider the following.

#### General Environment

1. Avoid, as far as possible, siting waste infrastructure or related infrastructure in areas protected for landscape and visual amenity, geological heritage and/or cultural heritage value. Where it is unavoidable, an impact assessment should be carried out by a suitably qualified practitioner and appropriate mitigation and/or alternatives must be provided;

2. Avoid siting waste infrastructure or related infrastructure in proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, and Refuges for Fauna;
3. To prevent the spread of Invasive Alien Species (IAS), where waste material is transported from one location to another, an IAS survey of source and receptor sites will be conducted by a suitably qualified person. If IAS are found, preventative measures will be implemented to prevent the onward spread of the plant/animal material including: employment of good site hygiene practices for the movement of materials into, out of and around the site; ensuring that imported soil is free of seeds and rhizomes of key invasive plant species; adherence to any national codes of practice relating to prevention of the spread of IAS (including both Ireland and Northern Ireland Codes of Practice);
4. In order to protect habitats which, by virtue of their linear and continuous structure (e.g. rivers and their banks) or their contribution as stepping stones (e.g. ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species, these features will be protected as far as possible from loss or disruption through good site layout and design;
5. To protect river habitats and water quality, ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15 m measured from each bank of any river, stream or watercourse;
6. Ensure that a Sustainable Drainage System (SuDS) is applied to any development and that site-specific solutions to surface water drainage systems are implemented;
7. Ensure the relevant requirements of the Water Framework Directive and associated River Basin Management Plans are met;
8. Avoid development of waste management infrastructure in flood risk areas. Reference should be made to the Planning System and Flood Risk Management for Planning Authorities (DECLG/OPW, 2009), National Flood Hazard Mapping (OPW), the relevant Flood Risk Management Plan (FRMP) and flood risk assessments for development plans;
9. Ensure that riparian buffer zones (minimum of 15 m) are created between all watercourses and any development to mitigate against flood risk. The extent of these buffer zones shall be determined in consultation with a qualified ecologist and following a Flood Risk Assessment. Any hard landscaping proposals shall be located outside of these buffer zones;

10. To protect river habitats and water quality (including physical habitat and hydrological processes/regimes), ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15 m measured from each bank of any river, stream or watercourse;
11. Avoid geologically unsuitable areas including karst where practicable, and areas susceptible to subsidence or landslides. Due consideration should be given to the primary water source of the area and the degree of surface water/groundwater interaction;
12. If there is an airport within 13 km of the proposed waste facility, the airport shall be consulted at an early stage of planning;
13. Impact from a transport perspective will be assessed including road access, network, safety and traffic patterns to and from the proposed facility in accordance with road design guideline and/or relevant LA guideline in relation to roads;
14. If there are existing, closed or inactive landfills which could be used for alternative waste activities as they are considered brownfield sites; also, suitably zoned, other brownfield sites could be used for waste activities. Sites that offer opportunities to integrate differing aspects of waste processing will be preferred choices. This will ensure maximum efficiency of waste processing subject to EIA and AA;
15. In keeping with the EIA Directive the 'whole project' is to be assessed. This applies to those developments which include for example haul roads or grid connections which are part of the overall project. This is to ensure the practice of project splitting is avoided; and
16. The cumulative effects of both existing and proposed waste facilities are to be assessed especially clusters of sub-threshold EIA development (where EIA is not required for individual projects).

### European Sites

The following guidance is provided to assist project developers and consenting authorities in recognising the need for protection of European Sites in the context of providing appropriately sited waste infrastructure. It is not intended to be a strict legal interpretation of the current regulations relating to the protection of European Sites. For the avoidance of doubt the relevant legislation governing European Sites shall be consulted by developers and authorities to ensure compliance with their legislative responsibilities. It is recommended that project developers discuss

with consenting authorities the location and potential for adverse effects of any new or upgraded development(s) in the context of European Sites in advance of submitting a planning application.

17. Avoid siting new waste infrastructure or related infrastructure in European Sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs);
18. Avoid siting new waste infrastructure or related infrastructure in Annex I Habitats occurring outside European designated sites;
19. With a view to improving the ecological coherence of the Natura 2000 Network, the public authority<sup>3</sup> will seek to avoid damage to features of the landscape which, by virtue of their linear and continuous structure (e.g. rivers and their banks) or their function as a stepping stone e.g. small ponds or small woods, are essential for the migration, dispersal or genetic exchange of wild species;
20. Undertake Appropriate Assessment (AA) Screening for all waste-related activities requiring development consent, e.g. new infrastructure, expansions and upgrades of existing infrastructure and activities, waste authorisation applications or reviews (e.g. CoR, WFP, and Waste Licences). The consenting authorities, i.e. the local planning authorities, An Bord Pleanála and EPA are the bodies responsible for determining whether a development can be screened in or out;
21. Where a significant effect on a European Site, either alone or in combination with other plans or projects, is identified, or where there is uncertainty with regard to effects, the competent authority will seek a Natura Impact Statement (NIS) to inform an AA. In so doing, the implications for any European Site in light of the site's Conservation Objectives shall be considered; and
22. For upgrades, expansion, enlargements and reviews related to existing waste activities and infrastructure, the competent authority will seek an evidence base to show that the existing operations are not negatively impacting on a European Site, alone or in combination with other plans and projects, with particular focus on avoiding the deterioration of natural habitats and the habitats of species as well as the disturbance of species for which the area has been designated.

<sup>3</sup> Public authority, as defined by the Waste Management Act 1996, means (a) a Minister of the Government, (b) the Commissioners of Public Works in Ireland, (c) a local authority for the purposes of the Local Government Act, 1941, (d) a harbour authority within the meaning of the Harbours Act, 1946, (e) a health board established under the Health Act, 1970 (f) a board or other body established by or under statute, (g) a company in which all the shares are held by, or on behalf of, or by directors appointed by, a Minister of the Government, or (h) a company in which all the shares are held by a board, company, or other body referred to in paragraph (f) or (g) of this definition;

## 2.2 ECONOMIC CONSIDERATIONS

23. Sites that offer the opportunities to **integrate differing aspects of waste processing** are preferred choices. This can improve efficiency of waste processing as can the co-location of waste management infrastructure with other infrastructure, such as energy, industrial, water and wastewater plants, which can be mutually beneficial in terms of energy and raw material supply and from environmental technology clusters;
24. **Access to services** including transport network, energy, water, and wastewater are essential in varying importance;
25. Room for **future expansion of the proposed facility**;
26. Adequate, acceptable, **vehicle parking and turning arrangements** are required, for all vehicles involved in the proposed activity;
27. **Proximity to waste producers and product markets** are important criteria for waste facilities to minimise transportation costs. The economic and environmental sustainability of transporting waste should be considered when siting sites with a view to minimising travel distances for wastes.

## 2.3 PLANNING CONSIDERATIONS

Proposed waste facilities will be required to either apply for planning permission to the relevant planning authority (with consequent rights of appeal) or to An Bord Pleanála directly under Strategic Infrastructure Development (SID) legislation. A prospective applicant should seek appropriate advice from the planning authority and/or An Bord Pleanála as necessary. Considerations include the following:

28. Waste management facilities should be located within **suitably zoned lands**, as identified in County and City Development Plans and Local Area Plans. This will ensure land use compatibility. In the absence of zoning, facilities should be subject to the good neighbour principle in which a person should take reasonable care to avoid acts or omissions that could be foreseen as likely to impact their neighbour. Formal pre-consultation with the local authority and An Bord Pleanála is recommended and is required for SID applications;



29. **Brownfield sites**, which are suitably zoned, may be suitable for waste activities. For example, closed landfills are sites that may fit these criteria and may have been identified as potential locations in previous waste plans;
30. The **geographic distribution of other similar authorised facilities** (whether constructed or not). Regional spatial imbalances should be avoided where possible to ensure the population at large is adequately serviced by relevant facility types. Equally important is the requirement to consider local facility clustering<sup>4</sup>, where complementary activities are co-located in a designated area;
31. There are a number of key principles on which current legislation is based. These are relevant to planning considerations for waste facilities. Included is the proximity principle, the precautionary principle, self-sufficiency and the polluter pays principle;
32. Stated objectives of the **National Waste Management Plan**;
33. The development of waste infrastructure should be cognisant of present and future population density so that proposed waste facilities will be optimally located;
34. **Proximity to consumers and industry**: The potential for resource synergies between waste facilities (particularly those producing energy) and urban areas, institutional buildings, sports facilities and industries should be examined. The exchange of heat, water and other resources can provide viability to facilities. Planning designations such as eco-parks or carbon neutral zoning may specifically encourage co-location and sharing of resources;
35. The requirement for national, regional or local self-sufficiency, as appropriate;
36. **Adjacent existing and zoned land uses**. These lands should be investigated to identify sensitive areas and other protected activities, likely to be adversely impacted by the facility operations. To protect sensitive areas from any impacts resulting from routine and non-routine operating conditions, such as offensive odours, noise, litter and dust, an adequate setback distance should be maintained between the principal processing area of the waste facility and incompatible land uses. A buffer zone is not an alternative to the

- siting criteria but provides for contingencies that may arise with typical management practices. Where this buffer zone is not available, the performance of management practices needs to be significantly increased to provide the same level of protection. However, it is unlikely that the facility can be managed with minimal adverse impacts if the setback distances are inadequate;
37. Consideration should be given to anticipated **community and commercial development near the proposed facility**; and
  38. Impact from a **transport** perspective to be assessed including road access, network, safety and traffic patterns to and from the proposed facility in accordance with road design guidance and/or relevant local authority guidance or other documents that have relevance in relation to transport and road network. Relevant documents may include Regional Spatial and Economic Strategies, County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans.

## 2.4 SOCIAL, COMMUNITY AND OTHER RELEVANT POLICY CONSIDERATIONS

Social and community-specific criteria address impacts that the facility may have on the surrounding community. These criteria incorporate local, social and cultural factors. Examples of these criteria include the following:

39. Environmental **social equity** should be given due consideration including the cumulative impact of siting existing and proposed waste infrastructure;
40. Developers are advised to use a combination of methods of public consultation to inform and collect public opinion;
41. Traffic compatibility with the existing neighbours and community;
42. Impact on historic or cultural features;
43. Impact on neighbourhood character; and
44. Impact on air quality and human health.

## 2.5 DESIGNATIONS THAT MAY PRECLUDE OR CURTAIL DEVELOPMENT

Certain designations may preclude or curtail development at sites. These designations include the following:

45. Waste management facilities should be located within **suitably zoned lands**, as identified in County and City Development Plans and Local Area Plans. This will ensure land use compatibility. In the absence of zoning, facilities should be subject to the good neighbour principle in which a person should take reasonable care to avoid acts or omissions that could be foreseen as likely to impact their neighbour. Formal pre-consultation with the Local Authority is recommended and is required for SID applications;
46. **Special Areas of Conservation** (SACs, including candidate SACs), are prime wildlife conservation areas in the country, considered to be important on a European as well as Irish level (Natura 2000 network of European Sites);
47. Ireland has designated **Special Protection Areas** (SPAs, including proposed SPAs) for the protection of endangered species of wild birds (Natura 2000 network of European sites);

48. **Natural Heritage Areas (NHAs)** and proposed NHAs are basic designations for wildlife. These areas are considered important for the habitats present, or hold species of plants and animals whose habitat needs protection;
49. The **National, Regional and Local Planning Policy** contexts. At a local level, the County and City Development Plans and Local Area Plans, should be examined for exclusionary factors;
50. **Areas of High Amenity and Archaeological Interest**. Archaeological features may influence the siting of waste infrastructure depending upon the importance of the site;
51. **Airport Exclusionary Areas**. If there is an airport within 13 km of the proposed waste facility, the airport shall be consulted at an early stage of planning; and
52. **National monuments and places and protected structures**, i.e. structures of special interest from an archaeological, historical, cultural and social point of view. When considered in combination these structures or areas may influence the siting of waste infrastructure.



<sup>4</sup> A business cluster is a geographic concentration of interconnected businesses, suppliers, and associated institutions in a particular field. The purpose of clustering is to increase productivity.



# 3 Waste Facility Siting Guidance

In addition to general siting criteria outlined in

**Section 2**, specific siting guidance has been prepared for the following types of facilities:

- CAS and bring facilities (bring banks and PTUs);
- Biological treatment facilities;
- Pre-treatment facilities;
- Soil and stone recovery facilities;
- Authorised treatment facilities for ELVs;
- Waste Storage Facilities; and
- Thermal recovery facilities.

## 3.1 CIVIC AMENITY SITES AND BRING FACILITIES

Civic Amenity Sites (CAS) and bring facilities i.e. bring banks and Pay-to-Use (PTU) banks, are facilities to which wastes are brought by householders and, in some cases, commercial waste producers. Bring facilities are stand-alone units in which members of the public deposit recyclable waste materials such as glass, cans and clothes for subsequent collection. These sites are not usually staffed. CAS are larger reception facilities, which enable householders to deposit a wide range of household waste. This includes recyclable and non-recyclable materials, bulky household waste, WEEE and certain categories of household hazardous waste. CAS are usually staffed and charges apply for certain waste materials.

Provision is made by the Planning and Development Regulations 2001, as amended, for a local authority to provide as exempted development a bring facility, where no more than five receptacles are provided, subject to certain other conditions<sup>5</sup>. This guidance applies to all bring facilities, including those that are exempt from planning requirements.

Location is key to the performance of bring facilities and CAS. A good location should have high footfall. This may mean a location with high drive-past rates compared to other areas. A site should also have easy access and sufficient space for the number and types of containers to be provided. The key reasons for assessing locations for these types of facilities are:

- To optimise existing site provision, as part of a service review to identify the most appropriate sites to remove, retain or relocate; and
  - To identify suitable new locations, as part of service expansion or relocation of existing sites.
- The following guidance for CAS and bring facilities are to be considered.
- **Site ownership:** Although it may be easier to obtain permission to use land owned by the local authority, a better location for a bring bank may be on private land, for example in supermarket car parks.
  - **Density of provision:** Understand the required level of service provision across the entire local authority area and adjoining local authorities, where relevant, and identify gaps in provision. The previous approach of specifying bring bank target ratios to population is now replaced with a case-by-case evaluation.
  - **Impact of bring facilities on local area:** Consider the site design to ensure high visibility to users. Also ensure limited visual impact and noise intrusion to neighbours.
  - **Proximity to routes:** Sites should be close to suitable driving routes, for convenience and good site utilisation.
  - **Proximity to neighbours<sup>6</sup>:** Sites located too close to neighbours have the potential to cause a nuisance and result in local objections and complaints. Well located sites offer the advantage of not requiring people to make dedicated journeys or even driving to use them.
  - **Site accessibility:** Access to a site should be as easy as possible, for users and for service vehicles, and risks to site users and employees minimised.
  - **Site safety:** Potential issues such as surface conditions, slopes/gradients, obstructions (both at ground level and overhead), trees, lighting, proximity of moving vehicles, space for safe parking/ drop off zone all need to be considered.
  - **Space:** Facilities need sufficient space to provide containers to collect all required materials. Consideration also needs to be given to servicing the facility to ensure that there is sufficient capacity to accept materials even during busy periods.

- **Parking for facility users:** Where it is expected that most users will arrive by car, they will require an adequate set down area. Adequate provision should be made to mitigate against situations where cars are queuing to access the facility.
- **Existing site performance and usage:** To assess the need and location for a new site, analyse the performance (such as tonnage performance data per site and material), capacity and servicing frequency at existing sites nearby to identify patterns in usage and anticipate future use of sites.
- **Consult with local authority departments:** In addition to formal pre-consultation planning, informal consultation with contacts in local authority departments (for example, housing, parks and environment) or, in waste management companies, may provide insights on likelihood of use and help identify any local issues relevant to the proposed site.
- **Consult with the community:** This can generate suggestions for potential site locations and options for optimising or relocating existing sites. It may also provide valuable feedback on how existing sites are used and any issues that exist regarding them.
- **Innovative collection:** There may be benefit from placing collection vessels underground. They can reduce illegal deposits around the bring facilities, reduce space occupation and noise and improve visual integration in the landscape. Other innovative collection techniques, which offer similar benefits, should also be considered.

Separate bring facilities and CAS guidance is addressed in **Sections 3.1.1** and **3.1.3** respectively.

### 3.1.1 Specific Guidance - Bring Facilities

The following specific guidance apply to bring facilities and PTUs.

- **Nuisance:** It is important to consider the following potential problems at the preferred bring bank locations:
  - **Noise:** Bring sites can be noisy and, as they are in public spaces, may be used 24 hours a day. Sites chosen should ensure that noise generated will not cause nuisance;
  - **Odour or vermin:** Odour or vermin (e.g. flies, wasp) issues may arise and require management, e.g. by washing the bank containers and by keeping the vicinity clean and tidy; and
  - **Anti-social activity:** There is potential for anti-social activity at bring facilities where there is a lack of supervision. Deterrents such as highly visible locations, signage, cameras and lighting and media campaigns can be effective.

### 3.1.2 Suitable Locations – Bring Facilities

Bring facilities should be accessible to the public by foot and not necessarily require people to drive to use them. The locations shall facilitate safe vehicular access for servicing and recycling of materials. Preferred locations include:

Preferred locations include:

- Locations incorporated into large residential or mixed use residential schemes at the planning stage;
- Existing and proposed retail parks and shopping centres;
- Locations including garage forecourts, car parks of suitable business, car parks of public parks, and public car parks;
- Schools and university campuses to primarily serve students and on campus residents;
- Existing and proposed waste management facilities, such as waste transfer stations, materials recovery facilities and similar pre-treatment facilities;
- Industrial areas; and
- Existing and proposed sports centres, venues and community halls.

### 3.1.3 Specific Guidance - Civic Amenity Sites

In addition to the general siting criteria outlined in **Section 2**, the criteria for bring facilities listed in **Section 3.1.1** and the advice provided in **Section 4.7** of the EPA Landfill Site Design Manual (2000), the following guidance for CAS may apply:

- **Quality of service:** CAS should provide high-quality services including:
  - Acceptance of a wide range of materials, hazardous and non-hazardous wastes;
  - Be aesthetically designed and facilitate large volumes of visitors with high-quality access and ample parking; and
  - Being innovative by providing areas to accept materials for reuse, and possibly space, to host educational talks/tours.

### 3.1.4 Suitable Locations - Civic Amenity Sites

The locating of CAS needs consideration of a wider range of factors than bring facilities. They need to be located close to good quality access roads for convenience and to encourage a viable level of usage and activity. Preferred locations for these sites are not as readily available in urban centres as bring facilities and a local authority or a private CAS provider may need to follow a site selection process to identify a suitable location (taking account of the relevant criteria and guidance). Suitable locations include:

<sup>5</sup> Planning And Development Regulations 2001, as amended, Schedule 2 Article 6 Part 1 lists as Exempted Development: Class 42 Development consisting of the use of land as a bring facility, where:

- No more than 5 receptacles shall be provided;
- The capacity of each receptacle shall not exceed 4.5 cubic metres;
- No such receptacle shall be situated on a public road;
- No such receptacle shall be situated within 50 metres of the curtilage of any house, save with the consent in writing of the owner or occupier thereof.

<sup>6</sup> In this document, neighbours mean neighbouring houses and business premises.

- Existing and proposed waste management facilities, such as waste transfer stations, materials recovery facilities and similar pre-treatment facilities;
- Existing and closed landfills; and
- Existing local authority waste depots or similarly owned lands.

### 3.2 BIOLOGICAL TREATMENT FACILITIES

Biological treatment facilities include composting, anaerobic digestion or other bio-processes for stabilising and sanitising biodegradable waste. The technology employed depends on the treatment (e.g. open, in-vessel etc) and such facilities can be located either within a rural context or at suitably zoned lands for such an activity.

In addition to the general siting criteria outlined in **Section 2**, the following specific guidance may apply when siting biological treatment facilities.

- **Nuisances (Dust and Odour):** Airborne contaminants with nuisance potential (such as bioaerosols, dust and odour) can generate within biowaste treatment processes from both waste deliveries and from ongoing processes. Facilities often have technological air management technologies that reduce, but may not eliminate, bioaerosols, dust and odour. Reductions below nuisance levels often rely upon dispersion techniques and buffer zones, making siting considerations important.
- **Proximity to Neighbours:** setback distances between the principal processing areas and residential properties are set out in **Appendix A** and take account of available biological treatment technologies. The specified distances can be reduced, provided that appropriate mitigation measures address key nuisance risks from the facility and are designed and implemented by the operator. No setback distances between the principal processing areas and business/industry are specified, provided appropriate mitigation measures to address key nuisance risks from the facility are designed and implemented by the operator.
- **Feedstock transport:** The proximity of biological treatment sites to feedstock and end use destinations needs consideration to minimise transportation costs. Facility feedstocks may be urban and rural in nature. Frequently, agricultural manures are required as a co-feedstock for anaerobic digestion. Equally, many facilities use or may wish to use domestic or commercial biowaste feedstocks, which tend to be urban sourced materials.

- **Product transport:** Outlets for compost and digestate products are frequently agricultural in nature. Therefore, it is important to locate facilities in proximity to receiving lands, which are suitable and have appropriate soil types, drainage conditions and usage patterns. This is particularly important for compost and digestates, which tend to be heavy and have a lower value per tonne than other recyclables. Thus they are expensive to transport.
- **Gas or electricity export:** Proximity of appropriate connection points for export of gas or electricity energy for anaerobic digestion facilities is a primary decision factor in locating facilities, as these are typically the primary revenue stream from anaerobic digestion facilities. Connection lines are expensive so minimising the distance to grid connections is preferable.
- **Heat export:** Biogas facilities generating electricity also generate significant amounts of heat as a by-product. The planned use of heat generated requires that potential heat users preferably be located close to the production point.
- **Area required for open windrow composting:** Windrow composting, which is used to compost garden organics, requires large areas as the process requires holding the materials onsite for up to six months at a time. Greenfield sites outside of settlement boundaries or zoned for agriculture, greenbelt or similar would generally be a better option for this type of activity.
- **Area required for in-vessel composting:** In-vessel facilities, used for food, sludge or other highly putrescible materials, are typically well-contained, can control emissions more, and require less floor area and lower setback distances than windrow facilities. They often use biofilters, which can make up a significant proportion of the area of the facility.
- **Noise:** Biowaste treatment facilities can have noise generating operations 24 hours per day, such as engines, pumps and fans. Amelioration measures are required to ensure that unreasonable nuisance is not caused.
- **Visual screening:** Emission stacks or biofilters disperse scrubbed air, which can form plumes of harmless but visible water vapour. Visual screening of these plumes can ameliorate public concern.

- **Animal health:** The Department of Agriculture, Food and Marine requires<sup>7</sup> that household food wastes and other meat-containing food wastes need to be treated by anaerobic digestion or in-vessel composting, under controlled conditions to comply with Animal By-Products Regulations. Thus animal by-products can only be collected, transported, stored and processed under the requisite animal by-product approvals. This ensures that pathogens are killed and access of animals to the animal by-product materials is prevented. The access restriction requirements include, inter alia, 'total physical separation between the plant and the premises or land where farmed animals and any feed/bedding for such animals are kept'. This measure is applied to protect animal health. It may prohibit location of biowaste treatment facilities close to lands where livestock are kept or have access to unless 'total physical separation' is applied.
- **Access:** The road network to the site needs to be of an appropriate quality to minimise impact. Access to the site via a suitable national or regional road is preferred and guidance distances are outlined in **Appendix A**. Facilities can be sited beyond the specified distances, when justified by a traffic impact assessment subject to the quality of the access roads. This demonstrates minimal impacts on local communities. As CoR facilities operate at lower levels of activity, no access distance is set. Nonetheless, access needs proper assessment, including suitability and quality of the road and the potential impact on the local community.

#### 3.2.1 Suitable Locations

Suitable locations include the following.

- Lands zoned for industrial activities, including waste activities, should be considered and take key factors into account, such as technology proposed, proximity to feedstock and local communities (residential or business).
- Lands zoned for greenfield or agricultural activities, subject to the requirements of animal by-product legislation, may be suitable. The nature of the activity and the waste feedstock and output material fit with existing land use.
- Active and closed landfill sites may be suitable locations as these sites typically have existing power grid connections, which would be beneficial for power export. These sites are also typically well screened and at a favourable distance from local communities.

- Co-locating these facilities with other industrial activities, such as wastewater treatment plants, should also be considered.

### 3.3 PRE-TREATMENT FACILITIES

Specific guidance for consideration when siting pre-treatment facilities is included in this section. For the purpose of this document pre-treatment facilities include the following:

- Operations such as dismantling, sorting, crushing, compacting, palletising, drying, shredding, conditioning, repackaging, separating, blending or mixing if the material or substance resulting from such operations is still waste. These activities do not sit on any particular rung of the waste hierarchy and instead can be regarded as precursors to specific types of treatment.

Pre-treatment facilities handle a variety of waste types and principally mechanically processed wastes. Many facilities treat municipal waste, which is waste from households, as well as commercial and other wastes similar in nature. Some pre-treatment facilities may handle construction and demolition (C&D) wastes solely, or as part of a mixture of wastes streams accepted. Industrial wastes are also accepted at these sites although volumes handled are lower and processing is typically confined to specific facilities. Different types of pre-treatment facilities include the following:

- **Mechanical Processing Facilities** – facilities that handle, store and process a variety of waste streams, such as residual wastes, recyclables, WEEE, hazardous or industrial wastes. The extent of processing at sites varies from simple to highly integrated and sophisticated lines. MRFs and integrated MBTs are examples of advanced mechanical processing facilities.
- **Materials Recovery Facilities (MRFs)** – facilities that separate, process and store dry recyclable materials, which have been collected separately.
- **Mechanical Biological Treatment Facilities** – facilities that treat residual municipal waste, in order to stabilise and reduce the volume of waste to be recovered, or disposed of. A combination of mechanical processing and biological breakdown may be employed. However, in Ireland to date, integrated facilities (Mechanical Biological

<sup>7</sup> Approval and operation of a 'type 8' composting/biogas plant transforming category 3 catering waste in Ireland CN14 - Guidance produced by DAFM.



- Treatment facilities) are sometimes developed with the mechanical and biological elements physically separated and located at different sites.
- **Transfer stations** – facilities where waste is reloaded, compacted or baled, with the intention of minimising the costs of transporting the wastes off-site for further recovery or disposal.<sup>8</sup>

The following guidance should be taken into account when siting pre-treatment facilities.

- **Access:** For sites handling large volumes of wastes, potentially over a long-period of time, the road network to the site needs to be of an appropriate quality to minimise impact. Access to the site via a suitable national or regional road is preferred and the distances are outlined in **Appendix A**. Facilities can be sited beyond the distances specified, subject to the quality of the accessing roads and minimal impact on local communities can be demonstrated.
- **Access to feedstock:** Wastes handled by pre-treatment facilities, such as municipal wastes, are generated by households and businesses. C&D waste handled by these sites are similarly sourced from households or local construction activities. The proximity of locating these facilities close to the point of waste generation is a key consideration and offers strong economic benefits to the waste operator. C&D waste is heavy in nature and may be of low value, indicating that it is uneconomical for the material to move long distances. Further, it may be possible to reuse the reprocessed materials at the original site of generation. Proximity of feedstock production and potential reuse projects/sites should be considered when locating facilities.
- **Access to end-markets:** By their nature these facilities process waste into secondary waste materials, which need to be transported off site to final treatment/disposal destinations or end-use markets. These can be indigenous locations or overseas markets. The proximity of these locations to high quality transport networks is vital, so that waste materials can be moved efficiently to the next destination. The distance to national road, rail, networks, and ports should be a key consideration, especially for facilities of a particular scale (50,000 tonne capacity<sup>9</sup> or higher).
- **Authorisations:** Authorisations by the local authorities and An Bord Pleanála will take account of the scale and availability of existing pre-treatment capacity in the region as required by the waste plans. In selecting a site it is important that project developers consider the available

capacity in the wider county and waste region, as well as adjoining regions where the proposed site is located.

- **Nuisance:** Facility operations, such as engines and fans, can generate noise 24 hours per day. Facilities processing C&D waste can employ crushing/screening equipment and heavy loaders. These machines may generate noise, vibration or dust nuisances that require amelioration measures. Odours and light pollutions can similarly be on-going nuisances from these facilities.
- **Proximity to neighbours:** Guidance setback distances from the location of the principal processing to the nearest residential property household and business/industry are outlined in **Appendix A**. The setback distances take account of the scale of the operation and the waste materials being handled and processed.
- **Traffic:** These facilities have the potential to generate a high volume of onsite and offsite vehicle movements. Appropriate location or amelioration measures are required to ensure that nuisance is not caused to local households or businesses.
- **Parking:** Vehicles may require access before facility opening. They also may require off-site parking. Queuing back from the weighbridge may occur at busy times and such traffic shall be managed safely. Appropriate locations or amelioration measures are required to ensure that nuisance is not caused on roads accessing the site.
- **Processing:** The market need and quality of the outputs from the proposed processing activity shall take account of Policy TP11.1 (see **Appendix B**) of the national waste management plan.
- **Visual screening:** The screening at a proposed site should be considered in terms of the natural coverage the location affords to minimise the visual impacts of the processing. A well screened site will help to absorb and minimise the noise from the activity.
- **Site safety:** Depending on the material being stored, there may be specific safety risks which need consideration at site selection stage. Fire safety is of critical importance, especially where facilities store flammable wastes, or wastes that can rise in temperature as the material breaks down. A fire safety plan must be in place demonstrating preventative and management measures in the event of a fire. Access to adequate water supply is an important consideration. The implications of the latest national guidance must be considered.

**Note:** Integrated on-site MBT facilities essentially include a biological treatment line and, as such, the guidance outlined in **Section 3.2** of this document also apply to proposed developments of this nature.

### 3.3.1 Suitable Locations

Pre-treatment facilities by their nature cover a wide range of potential activities and are intermediary sites that prepare wastes for further onward treatment at the next destination. In Ireland there are a large number of waste facilities that fall into this category and this trend is likely to continue. Sites offering more suitable locations include the following.

- Lands close to urban areas or the primary centres of waste that are zoned for industrial activities, including waste activities. These locations are favoured as being the most suitable sites, taking account of key factors such as proximity to feedstock and the importance of road networks. Lands zoned for greenfield or agricultural activities are generally not favoured, but may need to be considered in the absence of suitably zoned land particularly in more rural locations. The capacity of facilities in lower density locations may need to be limited to minimise impact on the local community, environment and transportation network.
- Active and closed landfill sites or sites where previous waste activities occurred may offer favourable locations in terms of screening, existing infrastructure and distance from neighbours, while also offering outlets for product storage and use.
- Co-locating these facilities with other waste or industrial activities may also offer suitable sites and should also be considered.

C&D waste pre-treatment facilities require mechanical processing equipment and machinery to process mixed streams of bulky wastes resulting from construction activities. Preferred locations include:

- Closed landfill sites or sites where previous waste activities occurred may offer favourable locations, in terms of screening, existing infrastructure and distance from neighbours;
- Active, closed/inactive quarries, pits and mines where similar machinery is used may offer locations for consideration in terms of screening, existing infrastructure and distance from neighbours. This may also offer potential outlets for product use and storage.

- Suitably zoned lands or brownfield sites, which allow for such activities, such as industrial zoning which can house such activities without adversely impacting on nearby neighbours. Zones dedicated for co-locating waste management and similar activities.

## 3.4 SOIL AND STONE WASTE RECOVERY FACILITIES

Soil and stone waste recovery facilities accept and recover clean uncontaminated soil and stone materials arising from construction and demolition by using land reclamation and restoration activities. The following specific guidance apply when siting soil and stone waste recovery facilities.

- **Purpose of the activity at that site:** In the past, soil and stone waste from earthworks and excavations was primarily managed by placing it in a variety of land use applications (including land reclamation, restoration or infill works). The sites selected were not always appropriate. Many were located on marginal agricultural land, with some including wetland habitats or subject to flooding. There is increasing recognition of the ecological and biodiversity value of wetland sites and a desire to avoid loss and fragmentation. At many historical infill sites the deposition of wastes was the primary purpose of the activity rather than land improvement. The siting of future land restoration activities on agricultural lands needs careful consideration of all factors, in particular the need for the activity, local biodiversity, risk to surface water and groundwater, risk of flooding, and the quality of local access routes. If environmental receptors, habitats or water bodies, surface or groundwater are at risk, the siting of such activities may not be suitable.
- **Need for capacity:** The need for capacity for the recovery of soil and stone wastes is a key consideration. The selection of sites for permitted and registered sites, which are often short-term solutions, needs to be justified addressing all of the necessary factors. The development of facilities with larger treatment capacities and longer lifespans is preferred.
- **Need for alternative outlets:** Given the decrease in landfills operating nationally, long-term soil and stone recovery solutions are required to provide security to this growing market. Old quarries/mines frequently require large quantities of soil material to fill voids, as part of their restoration and are considered good locations.

<sup>8</sup> Definitions from BAT Guidance Notes for the Waste Sector: Waste Transfer and Materials Recovery

<sup>9</sup> This figure is derived from the EPA waste licence limits



- **Authorisations:** Authorisations by the local authorities, EPA and An Bord Pleanála will take account of the scale and availability of existing backfilling capacity in the region. In selecting a location, project developers shall consider the available capacity and future capacity need in the county and region(s).
- **Protected / designated landscapes:** It may be permissible to locate soil and stone waste recovery projects within protected landscapes where these developments would provide a long-term beneficial impact for the protected landscape, such as quarry backfilling / restoration with inert materials.
- **Access:** For sites handling large volumes of soil and stone, potentially over a long-period of time, the road network to the site needs to be of an appropriate quality to minimise impact. Access to the site via a suitable national or regional road is preferred and guidance access distances for WFP and licensed sites are outlined in **Appendix A**. Facilities can be sited beyond the distances specified, when justified by a traffic impact assessment and subject to the quality of the access roads, which demonstrate minimal impacts on local communities. No access distance has been set for CoR facilities, which operate at low levels of activity. Nevertheless access needs to be assessed, including suitability and quality of the road and the potential impact on the local community.
- **Parking:** For large sites queuing of vehicles back from the weighbridge may occur at busy times. Appropriate locations or amelioration measures are required to ensure that nuisance is not caused on roads accessing the site.
- **Proximity to neighbours:** Sites located close to neighbours have potential to cause a nuisance (traffic, noise, dust etc. depending on the scale and type of activity) and result in local objections and complaints. Guidance setback distances from the principal processing area are outlined in **Appendix A**.

### 3.4.1 Suitable Locations

The policy in the existing waste plans aims to favour locations which provide long-term sustainable solutions. Preferred locations include:

- Inactive, historical or exhausted quarries, mines and pits which require substantial land restoration;
- Remediation projects with a significant requirement for soil and stone materials, such as reclamation of recently closed landfills, old gasworks or industrial processing sites and similar locations;

- Infrastructural projects which have a significant requirement for clean soil and stone materials; and
- Agricultural land, provided that it can be clearly demonstrated that there is a genuine need for land improvement, local environmental receptors and that habitats will not be adversely impacted.

## 3.5 AUTHORISED TREATMENT FACILITIES (ATF) FOR END-OF-LIFE VEHICLES (ELV)

The following specific guidance applies when siting an ATF for the treatment and storage (including temporary storage) of ELVs.

- **Density of facilities:** The European Union ELV Regulations 2014, as amended, requires producers, vehicle manufacturers and professional importers to join an approved compliance scheme (i.e. ELVES) or register with each local authority. The intention is for a national collection system providing free take-back for vehicles of that producer's brand, or for which that producer has responsibility. Producers are required to provide one ATF per 100,000 persons, with all urban agglomerations of 15,000 persons or more being within 45 kilometres of such a facility. When considering a site for selection, it is essential that project developers consider the existing scale of activities and the available capacity in the functional area of the relevant local authority.
- **Markets:** The outputs from these facilities comprise parts for re-use or recovery and metals for recycling, primarily abroad. Future site locations should consider the intended end-markets for secondary waste materials and the required travel distances.
- **Proximity to neighbours and nuisances:** Typical activities at ATFs include crushing, de-polluting, and separating through the use of mechanical equipment and machinery. This machinery may generate noise, vibration or dust, which require amelioration measures. The siting of such facilities need to take account of the distance to local residential properties and businesses. Guidance setback distances from an ATF to neighbours are outlined in **Appendix A**.
- **Access:** The road network to the facility needs to be of an appropriate quality to minimise impact. Access to the site via a suitable national or regional road is preferred. Access guidance distances are outlined in **Appendix A** to minimise impacts on local communities, subject to the quality of the local or regional road.

- **Visual screening:** The screening at a proposed site should be considered in terms of the natural coverage the location affords to minimise the visual impacts of the processing and the stacked crushed cars. A well screened site will help to absorb and minimise the visual impact from the activity.

### 3.5.1 Suitable Locations

ATFs typically require specialised mechanical processing equipment and machinery to process end of life vehicles. Preferred locations include:

- Suitably zoned lands, which allow for waste activities, such as industrial zoned lands. Suitable sites in urban or industrial areas close to centres of population where ELVs will be generated.

## 3.6 WASTE STORAGE FACILITIES

This section refers to permanent storage facilities and does not relate to the temporary storage of waste as covered by the Waste Management Act 1996.

The principal activities at waste storage facilities are the acceptance and storage of waste on-site. The operation at these facilities is the housing or storage of wastes. These facilities may offer, subject to the specific circumstances of individual cases, capacity contingency which can be required if suitable indigenous or overseas treatment options are not available. Unlike pre-treatment facilities, the mechanical treatment or processing of wastes is not undertaken at facilities primarily designed for storage.

The nature of the wastes and whether further treatment is required will influence the length of time the materials are held on site. The types of waste that may be stored on site include residual waste, dry recyclable waste, construction waste, treated sludge waste, treated biowaste and other inert waste.

The following guidance is for consideration when siting waste storage facilities.

- **Need for capacity:** The need for storage capacity is an important consideration which needs justification. This includes the purpose and environmental value of the storage in the context of the national waste management plan policies. The suitability of the site, the scale of the capacity and the type of wastes accepted are related issues requiring review.

<sup>11</sup> Guidance Note: Fire Safety at Non-Hazardous Waste Transfer Stations, EPA, 2013

- **Access:** The road network to the facility needs to be of an appropriate quality to minimise impact. Access to the site via a suitable national or regional road is preferred. Guidance access distances are outlined in **Appendix A**. Exceptions to this guidance may be permitted, subject to the quality of the road and if it can be demonstrated (by way of a traffic impact assessment) that there will be minimal adverse impact on local communities over the life time of the facility.
- **Odour and noise:** Odours and noise are possible nuisances that will need to be managed. The siting of such facilities are to take account of the risk these nuisances pose to local residential properties and businesses.
- **Screening:** The screening at a proposed site should be considered in terms of the natural coverage the location affords to minimise the visual impacts of the processing. A well screened site will help to absorb and minimise noise from the activity.
- **Traffic:** These facilities may generate a significant increase in on-site and offsite vehicle movements. Appropriate amelioration measures at the facility are required to ensure that potential traffic nuisances are not caused to local residential properties or businesses.
- **Site safety:** Depending on the material being stored, there may be specific safety risks that need consideration at site selection stage. Fire safety is of critical importance, especially where facilities store flammable wastes or wastes that can rise in temperature as the material breaks down. A fire safety plan must be in place demonstrating preventative and management measures in the event of a fire. Access to adequate water supply is an important consideration. The implications of the latest national guidance<sup>11</sup> should be considered.
- **Proximity to neighbours:** Guidance setback distances from the main storage building from residential properties are outlined in **Appendix A**. The specified distance can be reduced depending on the wastes handled, expected storage time and proposed mitigation measures. No setback distances to business or industry from this type of facility are specified provided nuisances identified are mitigated.

### 3.6.1 Suitable Locations

These include:

- Lands for industrial activities, including waste activities that can accommodate storage activities without adversely impacting on nearby neighbours. The type of waste being stored is a key consideration;
- Lands zoned for greenfield or agricultural activities. They may be suitable, depending on the waste being stored, e.g. sludge or inert wastes, which are destined for land spreading or land improvement activities;
- Active and closed landfill sites. These may be suitable locations as these sites have existing infrastructure in place including access, screening and nuisance controls; and
- Co-locating these facilities with other industrial activities, such as wastewater treatment plants, offers synergies that can also be considered.

## 3.7 THERMAL RECOVERY FACILITIES

Thermal recovery applications include waste-to-energy technologies such as incineration, pyrolysis and gasification and also cover certain production processes which involve the co-combustion of wastes, thus substituting fuels, in cement kilns or industrial furnaces. Thermal recovery facilities convert residual waste, RDF, SRF and other residual waste streams into a more useable form of energy such as heat or electricity.

There are many factors to consider when siting a thermal recovery facility, taking account of the nature of activity, local perceptions, scale and longevity. It is vital that a project developer follow or apply a formalised site selection process.

The siting should consider international guidance (refer to documents 1 to 5 listed in **Section 4**). The following specific guidance apply when siting thermal recovery facilities:

- **Scale:** Thermal recovery facilities, in particular waste-to-energy or gasification facilities, in Ireland tend to have large treatment capacities (150,000 - 690,000 tonnes per annum). Advanced thermal treatment facilities, such as pyrolysis, may have smaller capacities. The local infrastructure (water supply, energy grids, drainage, road network) needs to be adequate to support facilities on this scale, with associated large material and energy flows.

- **Access:** Many vehicle movements will be a consequence of significant waste flows to and from these sites. Many accessing vehicles will be heavy goods vehicles. Local road infrastructure to a proposed site must be of high quality and the location must be close to a national road. Access to such a site via a national or regional road is preferred, subject to traffic and road suitability to minimise impacts on communities. A specified guidance access distance is outlined in **Appendix A**. Exceptions to this guidance may be permitted if it can be demonstrated, by way of a traffic impact assessment, that the access roads are of the appropriate quality and there will be minimal adverse impact on local communities over the life time of the facility.
- **Proximity to neighbours:** A guidance setback distance from the location of the principal processing area of the facility to the nearest residential property is outlined in **Appendix A**. The setback distances reflect the nature of activity at such sites. Setback distances to businesses or industry are not specified so as to encourage co-location and industrial symbiosis. The co-location of industrial and waste facilities can potentially lead to exchanges and reuse of outputs such as heat, electricity, water and other resources.
- **Electrical output:** Electricity is a primary product from thermal recovery facilities such as waste-to-energy facilities. It is essential that the electricity grid is accessible as connections can be costly to install. The current capability of the grid to accept the output load from these facilities requires consideration.
- **Heat output:** Thermal recovery facilities whose primary purpose is the combustion of waste materials may generate heat that is suitable for export to users. Users may include industrial and municipal facilities, institutions (e.g. hospitals, hotels), private households and businesses via district heating systems. The siting of thermal recovery facilities close to urban and industrial areas offers advantages to recover heat produced from thermal treatment processes. If heat is a major output the proximity to customers can help to maximise the opportunity to develop a long-term supply of renewable energy. In terms of the long-term sustainability and recovery classification of a facility, it is preferable that heat outputs of a thermal recovery facility are captured.

- **Solid waste outputs:** Products from thermal recovery activities can include IBA, APC residues, pyrolysis char (the solid residue remaining from pyrolysis) and slag or ash from gasification. APC residues are a hazardous waste, which includes material such as fly ash from bag filters and lime used to neutralise acid gases. It could potentially be used in chemical treatment works or converted into aggregates (although this is an energy intensive process). The slag and/or IBA may be suitable for use as aggregate or cement manufacture. The pyrolysis char is a hazardous waste and is generally sent for disposal. Many facilities will also recover metals from the bottom ash, which can then be recycled. Consideration of the relative access of the site to high quality networks for solid waste outputs and or ports to transport material to indigenous/overseas outlets is required.
- **Gas outputs:** Gasification and pyrolysis processes can produce a low calorific gas, which can also be used in kilns or combusted directly for power/heat generation. Use of the gas will require proximity to an appropriate energy grid or energy user. Connections are expensive, so in siting a facility the distance to the gas grid needs to be taken on board.
- **Policy need:** Consideration of the national waste management plan policies and actions, specifically policy TP14.2 and Focus Area 14.

### 3.7.1 Suitable Locations

In general thermal recovery facilities should be located close to the source of wastes accepted at the sites and suitable end-users with a need for the energy and heat outputs.

Suitable locations include lands zoned for industrial activities.

The potential consumers of the energy and solid outputs produced by thermal recovery facilities include:

- Industry (heavy, light and agriculture);
- Energy companies;
- Urban centres (cities and towns);
- Wastewater treatment plants;
- Hospitals;
- Swimming pools; and
- Other industrial/institutional users.

The consideration of the end users should be part of the formal site selection process undertaken to identify suitable locations.



# 4 References

- World Health Organisation Working Group on Site selection for new Hazardous Waste Management Facilities. 1990;
- Basel Convention Series/SBC No. 97/005. Technical guidelines on incineration on Land. 1997;
- European Commission's advice reference on Site Selection and Incineration environmental impacts and mitigation measures;<sup>12</sup>
- Draft Guidelines on Best Available Techniques and Provisional Guidance on Best Environmental Practices relevant to Article 5 and Annex C of the Stockholm Convention on Persistent Organic Pollutants (2006) Secretariat of the Stockholm Convention;
- Best Available Techniques (BAT) Reference Document for Waste Treatment Industries Industrial Emissions, Directive 2010/75/EU (Integrated Pollution Prevention and Control) JOINT RESEARCH CENTRE Institute for Prospective Technological Studies Sustainable Production and Consumption Unit European IPPC Bureau Draft 1 (December 2015);
- 'Protection of New Buildings and Occupants from Landfill Gas' published by the Department of the Environment, Heritage and Local Government (1994);
- Waste Management Plan 2015 – 2021, Connacht Ulster Region (2015);
- Waste Management Plan 2015 – 2021, Southern Region (2015);
- Waste Management Plan 2015 – 2021 Eastern Midlands Region (2015);
- Wind Energy Development Guidelines (2006);
- WRAP publication, Update to Bring Recycling Guide (WRAP Project BHC002-207). (2012);
- Limerick/ Clare/ Kerry Region 2006- 2011;
- Donegal Waste Management Plan 2006- 2010;
- Cork County Waste Management Plan 2004 -2009;
- Waste Management Plan for Cork City 2004-2009;
- Waste Management Plan for County Kildare 2005- 2010;
- Joint Waste Management Plan for the South East Region 2006- 2011;
- Waste Management Plan for the Dublin Region 2005 – 2010;
- Waste Management Plan for the Midlands Region 2005- 2010;
- Waste Management Plan for the North East Region 2005- 2010;
- Replacement Waste Management Plan for the Connacht Region 2006- 2011;
- County Wicklow Replacement Waste Management Plan 2006-2011;
- National Hazardous Waste Management Plan 2014-2020 and 2021-2027, EPA (2014 and 2021);
- EPA Landfill Manual on Site Selection, Draft for Consultation (2006);
- National Spatial Strategy (NSS) 2002–2020 (2002);
- Project Ireland 2040 National Planning Framework (2018);
- Project Ireland 2040 National Development Plan (2018);
- Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022;
- Regional Planning Guidelines for the Midland Region 2010- 2022;
- South West Regional Authority, Regional Planning Guidelines 2010- 2022;
- Regional Planning Guidelines for the South East Region 2010- 2022;
- Regional Planning Guidelines for the Border Region 2010-2022;
- Mid-West Authority, Mid-West RPG 2010 -2022;
- Dublin City Development Plan 2011-2017;
- Galway City Development Plan 2011-2017;
- Clare County Development Plan 2011-2017;
- Mayo County Development Plan 2014-2020;
- Meath County Development Plan: 2013-2019;
- Limerick County Development Plan 2010-2016;
- Cork City Development Plan 2015-2021;
- Waterford County Development Plan 2011-2017;
- Waterford City Development Plan 2013-2019;
- Wicklow County Development Plan 2010-2016; and
- Cork County Development Plan 2009-2015.

<sup>12</sup> [http://europa.eu.int/comm/development/body/theme/environment/env\\_integ/env\\_integration/envman-1066.html](http://europa.eu.int/comm/development/body/theme/environment/env_integ/env_integration/envman-1066.html) and [http://europa.eu.int/comm/development/body/theme/environment/env\\_integ/env\\_integration/envman-1068.html#pgfld-609122](http://europa.eu.int/comm/development/body/theme/environment/env_integ/env_integration/envman-1068.html#pgfld-609122)

# Appendix A - Facility Siting Setback And Location Distances

This appendix provides guidance on distances to permanent residential properties<sup>13</sup>, businesses and access to national roads when siting new waste management facilities. The distances guide the siting of activities balancing economic development considerations alongside planning, environmental and community concerns. Mitigation measures, which reduce potential nuisances to acceptable levels, can reduce the guidance setback distances if implemented appropriately.

The suitability of lands for the development of each waste activity is described in **Table A-1**. The land classification options include urban, rural or industrial. A traffic light system is applied to indicate the suitability of the lands as follows:

- Location is favourable for this facility type;
- Location requires consideration for this facility type; and
- Location may be a significant obstacle for this facility type.

**Table A-1 Waste Management Facilities Guidance Distances and Suitable Land Locations**

Waste Facility Type	Guidance Setback Distances Between Principal Processing Area <sup>14</sup> of the Facility and Residential Property	Guidance Setback Distances Between Principal Processing Area of the Facility and Business/Industry	Guidance Distance from National Road Network <sup>15</sup>	Urban	Rural	Industrial
<b>Bring Facilities (Bring Banks and PTUs)</b>	Setback distances between bring facilities and residential properties are not specified. Potential nuisances (refer to <b>Section 3.1</b> ) are to be considered when siting bring facilities and managed appropriately.	Setback distances between bring facilities and businesses are not specified. Potential nuisances (refer to <b>Section 3.1</b> ) are to be considered when siting bring facilities and managed appropriately.	Bring facilities should be accessible to the public by foot and not necessarily require people to drive to use them. The locations must also facilitate safe vehicular access for servicing and recycling of materials.	●	●	●
<b>Civic Amenity Sites</b>	Setback distances between CAS and residential properties are not specified. Potential nuisances from these sites, as described in <b>Section 3.1</b> , are to be considered and managed appropriately.	Setback distances between CAS and businesses are not specified. Potential nuisances from these sites, as described in <b>Section 3.1</b> , are to be considered and managed appropriately.	CAS are to be located close to good quality access roads for convenience and to encourage a viable level of usage and activity.	●	●	●

<sup>13</sup> A residential property includes a private household, school, creche or healthcare facility with setback distances related to the nearest point of the building curtilage. For clarity a private household comprises either one person living alone or a group of people living at the same address with common housekeeping arrangements – that is sharing at least one meal a day or sharing a living room or sitting room.

<sup>14</sup> The Principal Processing (or treatment) Area is the location of the primary waste activity within the boundary of the proposed site

<sup>15</sup> National road network means Motorways and National roads. Exceptions to this distance guideline may be permitted if it can be demonstrated that there will be minimal adverse impact on local communities over the life time of the facility and the access road is found to be of suitable quality following a Traffic Impact Assessment (TIA).



Table A-1 Waste Management Facilities Guidance Distances and Suitable Land Locations (Cont'd)

Waste Facility Type	Guidance Setback Distances Between Principal Processing Area <sup>24</sup> of the Facility and Residential Property	Guidance Setback Distances Between Principal Processing Area of the Facility and Business/Industry	Guidance Distance from National Road Network <sup>25</sup>	Urban	Rural	Industrial
<b>Biological Treatment Facilities</b>	<p>Guidance setback distances from the principal processing area are as follows:</p> <ul style="list-style-type: none"> <li>• <b>100 metres</b> for composting open windrow facilities; and</li> <li>• <b>&lt; 100 metres</b> for in-vessel composting and anaerobic digestion facilities provided they can demonstrate adequate air/odour treatment.</li> </ul> <p>The above setback distances can reduce if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility. The distances apply to biological treatment facilities authorised by EPA waste licence, local authority WFP or CoR.</p>	<p>The co-location of these facilities with businesses and industry can encourage economic and resource co-operation / collaborations. Benefits, such as energy or feedstock exchange, may be realised with adjacent businesses, industry or farms. Setback distances are not specified, if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	<p>Access to the site via a suitable national or regional road is preferred in line with the following:</p> <ul style="list-style-type: none"> <li>• Licensed Sites are located within <b>15km</b> of a national road; and</li> <li>• Permitted Sites are located within <b>20km</b> of a national road. The larger distance reflects the intake at such facilities which is limited to <b>10,000t</b> per year.</li> </ul> <p>Facilities can be sited beyond the specified distances when justified by a traffic impact assessment and subject to the quality of the access roads which demonstrate minimal impacts on local communities. As CoR facilities operate at lower levels of activity no access distance is set. Access to future sites need to be assessed, including suitability and quality of the road and the potential impact on the local community.</p>	●	●	●

Table A-1 Waste Management Facilities Guidance Distances and Suitable Land Locations (Cont'd)

Waste Facility Type	Guidance Setback Distances Between Principal Processing Area <sup>24</sup> of the Facility and Residential Property	Guidance Setback Distances Between Principal Processing Area of the Facility and Business/Industry	Guidance Distance from National Road Network <sup>25</sup>	Urban	Rural	Industrial				
<b>Pre-Treatment Facilities</b>	<p>A guidance setback distance from the location of the principal processing to the nearest residential property is provided below. The setback distances take account of the scale of the operation and the waste materials being handled and processed. The setback distances reflect potential nuisances that can arise from such operations (refer to <b>Section 3.3</b> for more details). The setback distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	<p>A guidance setback distance, from the location of the principal processing to the nearest business is provided below. The setback distances take account of the scale of the operation and the waste materials being handled and processed. The setback distances reflect potential nuisances that can arise from such operations (refer to <b>Section 3.3</b> for more details). The setback distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	<p>The locations of sites are to be within <b>10km</b> of a national road.</p> <p>Facilities can be sited beyond the specified distances when justified by a traffic impact assessment and subject to the quality of the access roads which demonstrate minimal impacts on local communities.</p>	●	●	●				
							Pre-treatment including processing or co-processing of municipal residual waste	50m-Licence	Pre-treatment including processing or co-processing of municipal residual waste	50m-Licence
								25m-Facility Permit		25m-Facility Permit
								25m CoR		25m CoR
							Pre-treatment of Mixed Dry Recyclables only	50m-Licence	Pre-treatment of Mixed Dry Recyclables only	15m-Licence
								25m-Facility Permit		15m-Facility Permit
								25m CoR		10m CoR
							Pre-treatment of C&D Waste	50m-Licence	Pre-treatment of C&D Waste	50m-Licence
								25m-Facility Permit		25m-Facility Permit
	25m CoR		25m CoR							

Table A-1 Waste Management Facilities Guidance Distances and Suitable Land Locations (Cont'd)

Waste Facility Type	Guidance Setback Distances Between Principal Processing Area <sup>24</sup> of the Facility and Residential Property	Guidance Setback Distances Between Principal Processing Area of the Facility and Business/Industry	Guidance Distance from National Road Network <sup>25</sup>	Urban	Rural	Industrial
<b>Soil and Stone Recovery Facilities</b>	<p>The guidance setback distances from the principal processing area of the recovery activity to the nearest residential property are as follows:</p> <ul style="list-style-type: none"> <li>• <b>75 metres</b> for facilities operating under waste licence.</li> <li>• <b>50 metres</b> for facilities operating under waste facility permit; and</li> <li>• <b>15 metres</b> for facilities operating under CoR;</li> </ul> <p>The setback distances reflect the scale of activities at the proposed sites. The distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	<p>The guidance setback distances from the principal processing areas of the recovery activity to the nearest business or industry are as follows:</p> <ul style="list-style-type: none"> <li>• <b>75 metres</b> for facilities operating under waste licence;</li> <li>• <b>50 metres</b> for facilities operating under waste facility permit; and</li> <li>• <b>15 metres</b> for facilities operating under CoR;</li> </ul> <p>The setback distances reflect the scale of activities at the proposed sites. The distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility</p>	<p>Access to the site via a suitable national or regional road is preferred in line with the following setback distances:</p> <ul style="list-style-type: none"> <li>• <b>Licensed Sites</b> are located within 15km of a national road; and</li> <li>• <b>Permitted Sites</b> are located within 20km of a national road. The increased distance reflects their annual intake, which is substantially lower than licensed sites.</li> </ul> <p>Facilities can be sited beyond the specified distances when justified by a traffic impact assessment and subject to the quality of the access roads which demonstrate minimal impacts on local communities.</p> <p>As <b>CoR</b> facilities operate at lower levels of activity, no access distance is set. Access to future sites need to be assessed including suitability and quality of the road and the potential impact on the local community.</p>	●	●	●

Table A-1 Waste Management Facilities Guidance Distances and Suitable Land Locations (Cont'd)

Waste Facility Type	Guidance Setback Distances Between Principal Processing Area <sup>24</sup> of the Facility and Residential Property	Guidance Setback Distances Between Principal Processing Area of the Facility and Business/Industry	Guidance Distance from National Road Network <sup>25</sup>	Urban	Rural	Industrial
<b>ATFs</b>	<p><b>ATFs (with Shredder):</b> A guidance setback distance of <b>25m</b> is required from the facility's principal processing area to the nearest residential property.</p> <p><b>ATFs (No Shredder):</b> A guidance setback distance of <b>25m</b> from the facility's principal processing area to the nearest residential property is required. The setback distances reflect the scale of activities at the proposed sites. The distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	<p><b>ATFs (with Shredder):</b> A guidance setback distance of <b>25m</b> is required from the facility's principal processing area to the nearest business/industry.</p> <p><b>ATFs (No Shredder):</b> A guidance setback distance of <b>10m</b> from the facility's principal processing area to the nearest business/industry is required. The setback distances reflect the scale of activities at the proposed sites. The distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	<p>ATF sites are to be located within <b>10km</b> of a national road to minimise impacts on local communities, subject to the quality of the local or regional road. Facilities can be sited beyond the specified distances when justified by a traffic impact assessment and subject to the quality of the access roads which demonstrate minimal impacts on local communities.</p>	●	●	●
<b>Waste Storage Facilities<sup>16</sup></b>	<p>A guidance setback distance from the main storage building of <b>50 metres</b> from nearest residential property is required. The setback distances reflect the scale of activities at the proposed sites. The distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	<p>No guidance set back distance applies to business or industry from this type of facility, provided that potential nuisances are identified and mitigated.</p>	<p>Waste Storage Facilities are to be located within <b>10km</b> of a national road and subject to the quality of the local or regional road to minimise impacts on local communities.</p> <p>Facilities can be sited beyond the specified distances when justified by a traffic impact assessment and subject to the quality of the access roads which demonstrate minimal impacts on local communities.</p>	●	●	●

<sup>16</sup> This refers to permanent storage facilities and does not relate to the temporary storage of waste as covered by the Waste Management Act 1996.

Table A-1 Waste Management Facilities Guidance Distances and Suitable Land Locations (Cont'd)

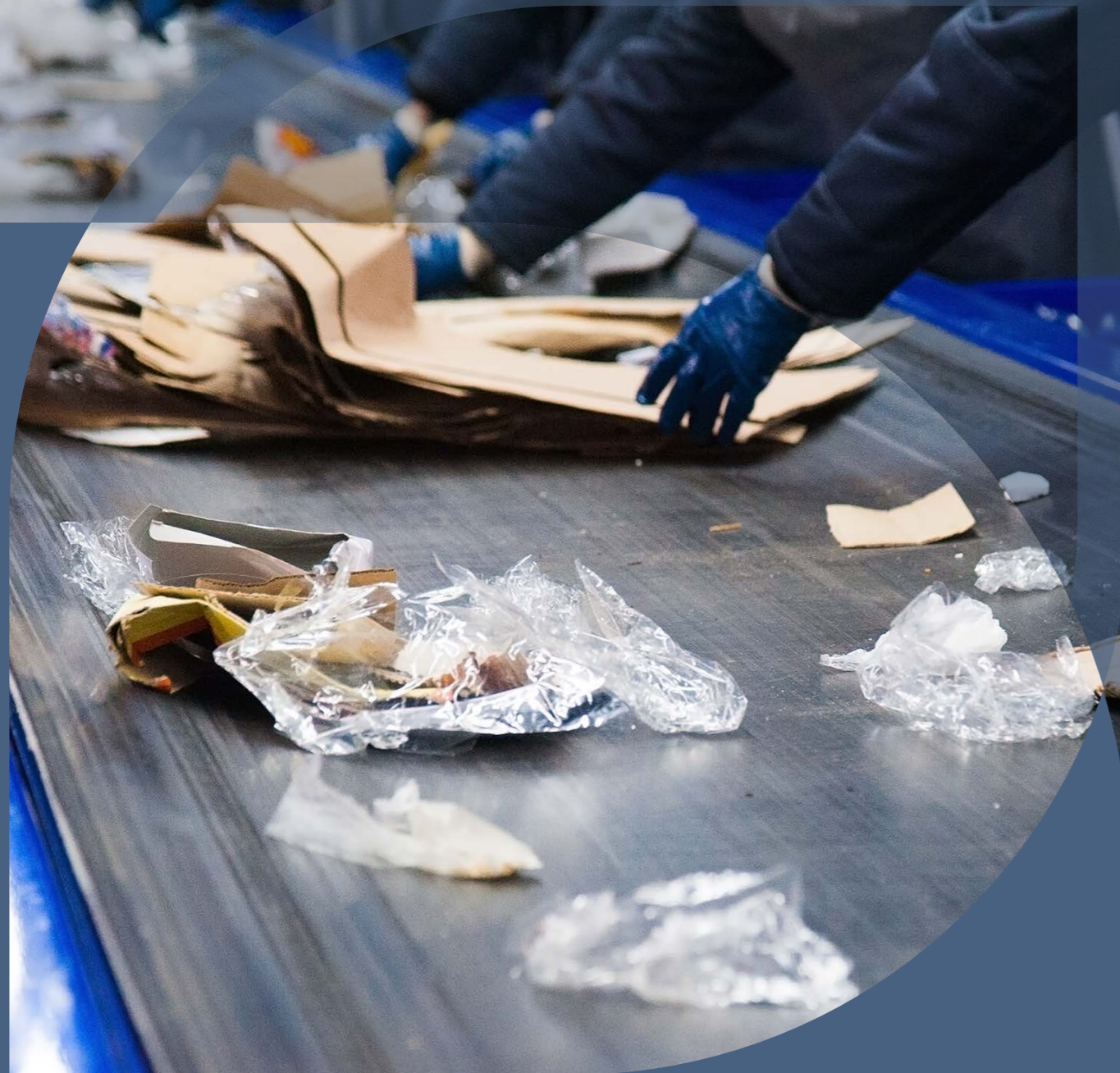
Waste Facility Type	Guidance Setback Distances Between Principal Processing Area <sup>24</sup> of the Facility and Residential Property	Guidance Setback Distances Between Principal Processing Area of the Facility and Business/Industry	Guidance Distance from National Road Network <sup>25</sup>	Urban	Rural	Industrial
<b>Thermal Recovery Facilities</b>	<p>Guidance setback distances from the location of the principal processing area of the facility to the nearest residential property are as follows:</p> <ul style="list-style-type: none"> <li>• <b>250 metres</b> for facilities handling over 100,000 tonnes per annum; and</li> <li>• <b>100 metres</b> for facilities handling less than 100,000 tonnes per annum.</li> </ul> <p>These setback distances reflect the nature of activity at such sites as outlined in <b>Section 3.7</b>.</p> <p>The setback distances reflect the scale of activities at the proposed sites. The distances can be reduced if the operator designs and implements appropriate mitigation measures to address key nuisance risks from the facility.</p>	Setback distances between thermal recovery facilities and businesses or industry are not specified, as these facilities can be co-located as the heat and electricity generated from the thermal recovery activity can be exchanged and reused by adjacent businesses and industry.	Access to such a site is via a national or regional road is preferred. Thermal recovery facilities are to be located within 5km of a national road subject to the quality of the local or regional road to minimise impacts on local communities. Facilities can be sited beyond the specified distances when justified by a traffic impact assessment and subject to the quality of the access roads which demonstrate minimal impacts on local communities.	●	●	●

## Appendix B - National Waste Plan Policies & Actions

### Waste Plan Policy for Infrastructure Regulation (Focus Area 11)

Target Policy Ref.	Detail
TP11.1	The development or enhancement of existing or new infrastructure or initiatives will be subject to the application of the waste hierarchy and the waste facility siting guidance for all new infrastructure (with this guidance to be embedded in Local Authority Development Plans).
TP11.2	Enhance national self-sufficiency with the development of sustainable waste management infrastructure where feasible and viable.
TP11.3	Ensure that future authorisations of waste infrastructure take account of the authorised and available capacity in the market.
TP11.4	Work with regulators to expedite the consenting processes for new or modified infrastructure and operations to ensure efficient delivery of the required capacity.
TP11.5	The EPA and the National Waste Collection Permit Office will work on the development and maintenance of a national capacity register for all authorised waste treatment operations within the State.
Priority Action Ref.	Detail
PA11.1	Ensure infrastructural developments are in compliance with the waste hierarchy, siting guidance and the wider policy framework of this Plan through engagement with An Bord Pleanála, Planning Authorities and other relevant bodies. Responsibility: Local Government Sector
PA11.2	Develop a National Waste Infrastructure Capacity Register and other improvements to aid the consenting process. Responsibility: EPA and Local Government Sector
PA11.3	Ensure at least one facility per local authority is authorised for storage of waste from road maintenance and other local authority construction projects. Responsibility: Local Government Sector and EPA
PA11.4	Review all waste related Strategic Infrastructure Development applications with regard to the waste hierarchy, business continuity and contingency. Responsibility: An Bord Pleanála and Local Government Sector





## APPENDIX 10

### Index of Plan Policies and Actions

## Core Policies

Ref.	Detail
CP1	Protection of the Environment - Oversee waste activities and litter control measures to ensure they do not pose a risk to the environment and human health and make a positive contribution to circularity.
CP2	Climate Action - Support the delivery of the measures and actions prescribed in the Climate Action Plan to contribute to achieving the national climate targets.
CP3	Policy and Legislation - Implement and enforce EU and national waste policies and plans and translate into actions that enable the transition to a circular economy and the achievement of national recycling targets.
CP4	Collaboration - Collaborate with key partners and stakeholders on the delivery of core and targeted policies and priority actions to ensure appropriate financial and human resources are provided.
CP5	Changing Behaviours - 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.
CP6	Organisational Structures - Ensure that the planning, regulatory and enforcement functions of the local government sector are appropriately aligned, coordinated, and supported by central government to respond to existing challenges.
CP7	Innovation - Encourage and support further research and innovation in the transition to a circular economy.
CP8	Monitoring - Monitor the provision of waste infrastructure to ensure that there is adequate appropriate infrastructure in place and where deficits exist to support solutions in line with the waste hierarchy, self-sufficiency, proximity and circularity.
CP9	National Development Plan - Support the National Strategic Objectives, Sectoral Strategies and Strategic Investment Priorities set out in the National Development Plan 2021-2030.
CP10	Green Public Procurement - Reinforce the consistent application of Green Public Procurement criteria in local authority contracts to ensure that public spending is aligned with the policies of this Plan and the Green Public Procurement strategy and Action Plan.
C11	Data Quality - 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.
CP12	Nationally and Regionally Important Infrastructure - The Plan recognises and supports the need for nationally and regionally important waste infrastructure including infrastructure of the type, scale and proximity essential to maintain waste services and infrastructure that contributes to the ambition and policies of the Plan.
CP13	Funding this Plan - The Plan seeks to attract funding, including from relevant taxes and economic instruments to support initiatives and projects that underpin business continuity, core and targeted policies and priority actions. Any project or initiative arising from the implementation of this Plan will take account of appropriate principles including polluters pay principle.

## Focus Area 1: Commercial Waste

Target Policy Ref.	Detail
TP1.1	Identify and promote new means, methods and key drivers of sustainable consumption practices to reduce waste generation.
TP1.2	Ensure that all non-household municipal waste settings adopt best practice on waste segregation and are serviced with a segregated waste collection system to maximise the quantity and quality of materials collected.
TP1.3	Strengthen the monitoring and accurate measurement of commercial municipal waste flows.
TP1.4	Implement appropriate engagement and /or enforcement measures in response to non-compliances identified.
TP1.5	Promote the consistent application of an appropriate incentivised charging system for non-household municipal waste, through awareness and enforcement.
Priority Action Ref.	Detail
PA1.1	Collaborate with other agencies to develop and deliver targeted awareness campaigns and projects to improve behaviours on prevention reuse and repair in non-household settings. Responsibility: Local Government Sector
PA1.2	Enhance the capture of data from waste collectors for non-household settings through the National Waste Collection Permit Office. Responsibility: Local Government Sector
PA1.3	Investigate the potential for a sustainable waste management assurance scheme for business consistent with the transition to a circular economy. Responsibility: Local Government Sector and Waste Industry
PA1.4	Engage with businesses through local authority structures to promote consistent practices with regard to the management of commercial waste using measures including the MyWaste.ie business tools. Responsibility: Local Government Sector and Industry
PA1.5	Ensure the consistent and targeted application of waste storage and presentation bye-laws to improve participation and segregation practices and incorporate into the RMCEI process. Responsibility: Local Government Sector

## Focus Area 2: Municipal Household Waste

Target Policy Ref.	Detail
TP2.1	Identify and promote new means, methods and key drivers of sustainable consumption practices to reduce waste generation.
TP2.2	Ensure that all household settings can avail of an authorised waste service primarily segregated kerbside but also including Civic Amenity Sites or other appropriate alternatives.
TP2.3	Strengthen the monitoring and measurement of household waste and implement appropriate enforcement measures in response to non-compliances identified.
TP2.4	Identify and implement enhanced collection and segregation systems for additional waste streams for all household settings to maximise the quantity and quality of materials collected.
TP2.5	Analyse the impact of the existing incentivised charging system for household municipal waste.
Priority Action Ref.	Detail
PA2.1	Collaborate with all stakeholders to deliver continued and focussed behavioural change campaigns and projects, targeting households, that enable the transition to sustainable consumption. Responsibility: EPA and Local Government Sector and DECC
PA2.2	Maximise households on kerbside systems, standardise the Identification of bins and promote items accepted for recycling using visual representation. Responsibility: Local Government Sector and Waste Industry
PA2.3	Identify potential waste streams for preliminary feasibility assessment as additional kerbside services. Responsibility: Local Government Sector and Waste Industry
PA2.4	Arising from the impact analysis (TP2.5), review the application of existing incentivised charging arrangements and examine the potential for enhancements and improvements. Responsibility: DECC and Local Government Sector
PA2.5	Identify/investigate unauthorised collection/disposal/recovery of household waste, ensure the consistent and targeted application of the waste storage and presentation bye-laws and incorporate into the RMCEI process. Responsibility: Local Government Sector
PA2.6	Identify appropriate segregated waste collection systems for apartments and mixed use developments and support the waste industry in the implementation of these systems. Responsibility: Local Government Sector and Waste Industry



## Focus Area 3: Compliance Schemes

Target Policy Ref.	Detail
TP3.1	Promote and enhance the capture, reuse, repair and circularity of mandated waste streams by working with Compliance Schemes.
TP3.2	Promote the eco-design of products that are resource-efficient, durable, repairable, reusable and upgradable in order to maximise material reuse and prevent waste generation.
TP3.3	Identify and prioritise the establishment of additional Compliance Schemes or appropriate arrangements for priority waste streams.
TP3.4	Promote the Commission's introduction of a 'right to repair' initiative to provide consumers with information on product durability and reparability, availability of repair services, spare parts and repair manuals, and software updates and upgrades.
Priority Action Ref.	Detail
PA3.1	Support Compliance Schemes in the development and delivery of targeted awareness campaigns and projects in relation to packaging. Responsibility: Compliance Schemes and Local Government Sector
PA3.2	Implement the recommendations in the Civic Amenity Site Review including a framework for access to materials for reuse and repair with the Compliance Schemes. Responsibility: Compliance Schemes and Local Government Sector
PA3.3	Establish the feasibility, with DECC, of Extended Producer Responsibility arrangements for other waste streams to accelerate the transition to a circular economy. Responsibility: DECC and Local Government Sector and Industry
PA3.4	Support and track the impact of fee modulation as a key driver for increased recycling and circularity. Responsibility: Compliance Schemes and Local Government Sector
PA3.5	Ensure that there is an adequate and proportionate enforcement regime in place to support Compliance Schemes and identify deficits where they exist. Responsibility: DECC and Local Government Sector

## Focus Area 4: Collection Systems

Target Policy Ref.	Detail
TP4.1	Maintain the primacy of kerbside source segregated collection of commercial/household waste as the optimum method to ensure the quantity and quality of materials collected.
TP4.2	Ensure that alternative collection systems are consistent with established kerbside collection systems.
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.
TP4.5	Evaluate existing offshore islands waste collection systems and identify appropriate enhancements consistent with international best practice and the waste hierarchy.
Priority Action Ref.	Detail
PA4.1	Identify areas of low participation/coverage with WERLA and NWCPO and engage with service providers to enhance coverage. Responsibility: Local Government Sector and Waste Industry
PA4.2	Develop a strategy for the provision of fully segregated collection infrastructure at apartments and mixed use developments and produce guidance for the inclusion of infrastructure at all new developments. Responsibility: Local Government Sector and Waste Industry
PA4.3	Collaborate with service providers to develop templates for: standardised bulky goods and textile collection schemes, a dedicated collection service for repairables and examine the potential for the collection of household and small-scale hazardous waste. Responsibility: Local Government Sector and Waste Industry
PA4.4	Support and implement the recommendations of the National Review of Civic Amenity Sites in conjunction with DECC, Compliance Schemes and other key stakeholders. Responsibility: Local Government Sector, DECC and Compliance Schemes
PA4.5	Promote the provision of publicly accessible waste infrastructure including civic amenities, bring banks and pay to use facilities in particular in response to PA4.1, and ensure that such infrastructure is properly regulated. Responsibility: DECC and Local Government Sector
PA4.6	WERLAs will work to ensure: The application of targeted equitable and proportionate enforcement on all waste collection activities, the implementation of the Waste Presentation Bye-Laws with a particular focus on the provisions of PA4.1 and continued and consistent data validation. Responsibility: Local Government Sector



## Focus Area 5: Food Waste

Target Policy Ref.	Detail
TP5.1	Enable consumers, service providers and producers to make informed choices to prevent food waste.
TP5.2	Coordinate the response of the local authority sector to the Food Waste Charter and the specific sectoral obligations contained in the National Food Waste Prevention Roadmap including regulatory and awareness activities.
TP5.3	Support the development and implementation of sustainable and circular food waste management options for all businesses and homes.
TP5.4	Continue to promote the optimum and preferred methods for the management of food waste in all settings.
Priority Action Ref.	Detail
PA5.1	Collaborate with the Stop Food Waste programme to inform business' and householders on best practice food waste prevention to drive behavioural improvements. Responsibility: EPA and Local Government Sector
PA5.2	Coordinate the annual National Food Waste Recycling Week in partnership with the members of the National Food Waste Recycling Steering Group and local authorities. Responsibility: EPA and Local Government Sector
PA5.3	Manage the delivery and monitoring programme for the national rollout of Food Waste Separation Packs to households. Responsibility: Local Government Sector
PA5.4	Provide guidance and support to assist all settings to meet the food waste target and to assist the primary production, manufacturing, processing sectors with the quantification and reduction of food losses along the production and supply chain including post-harvest losses. Responsibility: EPA and Local Government Sector and Department of Agriculture, Food and the Marine
PA5.5	Continue the targeted enforcement of waste collection permits and waste presentation bye-laws with regard to the provision of food waste recycling bins to non-household and household settings. Responsibility: Local Government Sector
PA5.6	Explore options to improve the harmonisation of the renewable feed in tariffs across the island of Ireland to incentivise the indigenous treatment of food/biowaste. Responsibility: DECC and Local Government Sector

## Focus Area 6: Packaging Waste

Target Policy Ref.	Detail
TP6.1	Enable consumers, service providers and producers to make informed choices to prevent plastic and packaging waste.
TP6.2	Improve the source segregation and processing of recyclable bin materials to optimise recycling and aid circularity.
TP6.3	Coordinate the response of the local authority sector to the sectoral obligations contained in the EU Directive on Packaging Waste, including regulatory and awareness activities.
TP6.4	Work with the Packaging Compliance Scheme to promote and enhance the capture and circularity of packaging waste.
Priority Action Ref.	Detail
PA6.1	Develop and deliver targeted campaigns to improve consumer behaviour on preventing and segregating packaging waste. Responsibility: Local Government Sector
PA6.2	Promote best practice and raise awareness of future obligations in the retail sector on reducing packaging waste including in-store packaging collection systems, deposit return schemes, promotion of reusable packaging and product refills. Responsibility: Compliance Scheme and Local Government Sector
PA6.3	Promote the introduction of Deposit Return Schemes for plastic bottles and aluminium cans emphasising the positive contribution to materials quality and potential circularity. Responsibility: DECC and Local Government Sector
PA6.4	Promote the use of recycled materials in packaging with designers and manufacturers to support the transition to the requirements of the revised Packaging and Packaging Waste Regulations. Responsibility: DECC, EPA and Local Government Sector
PA6.5	Increase compliance scheme participation with the support of the compliance scheme operator. Responsibility: Compliance Scheme and Local Government Sector

## Focus Area 7: Single Use Plastic (SUP) Waste

Target Policy Ref.	Detail
TP7.1	Coordinate the response of the local authority sector to the sectoral obligations contained in the Single Use Plastic Directive and national policy, including regulatory and awareness activities.
TP7.2	Promote and deliver best practice in the hospitality, sports and events sector including the mandatory requirement for reusable containers / plates / cutlery and provision of accessible drinking water fountains.
TP7.3	Promote and facilitate the introduction of deposit return systems or schemes for single use plastics.
TP7.4	Support the application of the prohibitions and levies on single use plastics.
TP7.5	Prohibit the use of single use plastics by local authorities in offices and public areas as well as at outdoor public events through licensing.
Priority Action Ref.	Detail
PA7.1	Monitor the application of the prohibitions on single use plastic materials being placed on the Irish market. Responsibility: DECC and Local Government Sector and EPA
PA7.2	Implement best practice with regard to single use plastic in the licensing of hospitality events and community sectors and prepare best practice guidelines for the sector for the elimination of single use plastic. Responsibility: DECC and Local Government Sector
PA7.3	Monitor the application of existing and new environmental levies on single use products and highlight the purpose of the levies. Responsibility: Local Government Sector
PA7.4	Pilot the elimination of single use plastics in selected towns or institutions. Responsibility: DECC and Local Government Sector and EPA
PA7.5	Ensure that there is an adequate and proportionate enforcement regime in place with regard to the prohibition of single use plastics and the application of environmental levies and identify deficits where they exist. Responsibility: DECC and Local Government Sector

## Focus Area 8: Construction and Demolition

Target Policy Ref.	Detail
TP8.1	Prioritise waste prevention and circularity in the construction and demolition sector to reduce the resources that need to be captured as waste.
TP8.2	Identify and promote the growth of secondary material markets, including the elimination of barriers to the development of these markets, within the construction and demolition sector.
TP8.3	Incorporation of the EPA Best Practice Guidelines for the preparation of Resource & Waste Management Plans for Construction & Demolition Projects and NWPS Soil & Spoil Action Plan, and monitoring by local authorities of the application of these requirements.
TP8.4	Identify and promote materials with a low embodied carbon and high circular potential to maximise use in the construction sector.
TP8.5	Pursue and support a targeted levy on virgin materials to encourage the use of secondary raw materials.
Priority Action Ref.	Detail
PA8.1	Implement Green Public Procurement criteria on all local authority construction and demolition projects and promote its wider use within the sector. Responsibility: Local Government Sector
PA8.2	Pilot the preparation of Resource & Waste Management Plans for construction and demolition projects at selected local authority developments. Responsibility: Local Government Sector
PA8.3	Develop and deliver training, with the EPA, to support national decisions on Regulation 27 by-products for site won asphalt (road planings) and greenfield soil and stone; and support the implementation of a national decision on Regulation 28 end-of-waste for aggregates, which includes crushed concrete and prioritise the use of materials arising from national end-of-waste or by-product decisions. Responsibility: EPA and Local Government Sector
PA8.4	Incorporate the requirement for Construction and Demolition Resource & Waste Management Plans in land use policy in County/City Development Plans. Responsibility: Local Government Sector
PA8.5	Explore potential compatible waste streams in mixed waste skips to minimise contamination and maximise reuse, recycling and circularity on construction projects and provide guidance to the sector. Responsibility: Local Government Sector
PA8.6	Allocate available resources and identify any additional resources required to consistently monitor construction and demolition projects to assess compliance with the project Resource & Waste Management Plan and apply appropriate enforcement measures to ensure compliance. Responsibility: Local Government Sector

## Focus Area 9: Textiles

Target Policy Ref.	Detail
TP9.1	Influence and drive improved behaviours around textile consumption, in particular with regard to climate impact and the EU strategy for sustainable and circular textiles and the Circular Economy Programme.
TP9.2	Engage with designers, producers, retailers, collectors and processors to coordinate the systematic tracking and management of textiles to minimise waste and optimise circularity.
TP9.3	Identify measures to promote reuse and repair of textiles.
TP9.4	Foster greater collaboration between the retail, reuse and post-consumer textile sector to maximise synergies.
Priority Action Ref.	Detail
PA9.1	Develop and deliver targeted awareness campaigns and projects to improve behaviour around the sustainable consumption, circularity and collection of textiles. Responsibility: Local Government Sector
PA9.2	Assess and define the extent of existing textile collection options and infrastructure, including the network of registered charity outlets. Responsibility: EPA and Local Government Sector and DECC
PA9.3	Further to the outcome of PA9.2, make recommendations on the enhancement of existing options or the introduction of alternative options for textile collection. Responsibility: EPA and Local Government Sector and DECC
PA9.4	Encourage and facilitate greater collaboration between the retail, reuse and post-consumer textiles sector to maximise synergies. Responsibility: EPA and Local Government Sector and DECC
PA9.5	Review the regulatory and enforcement regime for textile collection and processing and make recommendations as required. Responsibility: EPA and Local Government Sector and DECC

## Focus Area 10: Hazardous Waste

Target Policy Ref.	Detail
TP10.1	Promote informed decision making to influence appropriate consumption to prevent the generation of hazardous waste.
TP10.2	Coordinate the response of the local authority sector to the specific sectoral obligations contained in the National Hazardous Waste Management Plan 2021 – 2027 including regulatory and awareness activities.
Priority Action Ref.	Detail
PA10.1	Conduct awareness raising campaigns to highlight best-practices and alternatives, with initial focus on paints, cleaning products, lithium-ion batteries and gardening chemicals. Responsibility: EPA and Local Government Sector
PA10.2	Update guidance on disposal of household hazardous waste and disseminate with targeted campaigns through the EPA website, mywaste.ie and waste operators. Responsibility: EPA and Local Government Sector
PA10.3	Conduct national surveys on householder awareness and behaviours regarding hazardous substances to inform prevention initiatives and measures. Responsibility: Local Government Sector and the Central Statistics Office
PA10.4	Examine the potential of product and in-store labelling of hazardous substances to inform consumer purchasing and waste management decisions. Responsibility: Local Government Sector
PA10.5	Identify locations for asbestos collection facilities and work with the EPA to deliver collections and to promote best practice in the management of asbestos contaminated waste. Responsibility: EPA and Local Government Sector
PA10.6	Ensure that there is an adequate and proportionate enforcement regime in place to mitigate the impact of hazardous waste on the environment and human health and identify deficits where they exist. Responsibility: EPA and Local Government Sector (including NTFSO)



## Focus Area 11: Infrastructure Regulatory

Target Policy Ref.	Detail
TP11.1	The development or enhancement of existing or new infrastructure or initiatives will be subject to the application of the waste hierarchy and the waste facility siting guidance for all new infrastructure (with this guidance to be embedded in Local Authority Development Plans).
TP11.2	Enhance national self-sufficiency with the development of sustainable waste management infrastructure where feasible and viable.
TP11.3	Ensure that future authorisations of waste infrastructure take account of the authorised and available capacity in the market.
TP11.4	Work with regulators to expedite the consenting processes for new or modified infrastructure and operations to ensure efficient delivery of the required capacity.
TP11.5	The EPA and the National Waste Collection Permit Office will work on the development and maintenance of a national capacity register for all authorised waste treatment operations within the State.
Priority Action Ref.	Detail
PA11.1	Ensure infrastructural developments are in compliance with the waste hierarchy, siting guidance and the wider policy framework of this Plan through engagement with An Bord Pleanála, Planning Authorities and other relevant bodies. Responsibility: Local Government Sector
PA11.2	Develop a National Waste Infrastructure Capacity Register and other improvements to aid the consenting process. Responsibility: EPA and Local Government Sector
PA11.3	Ensure at least one facility per local authority is authorised for storage of waste from road maintenance and other local authority construction projects. Responsibility: Local Government Sector and EPA
PA11.4	Review all waste related Strategic Infrastructure Development applications with regard to the waste hierarchy, business continuity and contingency. Responsibility: An Bord Pleanála and Local Government Sector

## Focus Area 12: Reuse / Repair Infrastructure

Target Policy Ref.	Detail
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.
TP12.2	Support, develop and deliver training programmes to provide upskilling in reuse and repair.
TP12.3	Support the development of viable reuse/repair infrastructure and initiatives including materials recovery or other advanced pre-treatment infrastructure that increases the circular potential of materials.
TP12.4	Encourage the development of circular activities which stimulate and support viable secondary material markets and secondary product markets in the construction, industrial and bioeconomy sectors.
TP12.5	Work with stakeholders to overcome insurance and liability barriers within the reuse and repair markets.
Priority Action Ref.	Detail
PA12.1	Provide technical support and training to the reuse and repair sector. Responsibility: Local Government Sector
PA12.2	Facilitate reuse and repair at designated Civic Amenity Sites. Responsibility: DECC and Local Government Sector
PA12.3	Pilot one dedicated collection service for potential repairable products in each region and align with repair practitioners. Responsibility: DECC and Local Government Sector
PA12.4	Identify and encourage potential materials markets for reuse and repaired goods. Responsibility: Local Government Sector
PA12.5	Investigate the appropriate authorisation regime for reuse and repair activities. Responsibility: DECC, EPA and Local Government Sector
PA12.6	Collaborate with the EPA through the National Reuse and Repair Partnership to facilitate the capture of reuse and repair data. Responsibility: EPA and Local Government Sector

## Focus Area 13: Recycling Infrastructure

Target Policy Ref.	Detail
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.
Priority Action Ref.	Detail
PA13.1	Maintain the register of recycling infrastructure on Mywaste.ie to include Civic Amenity Sites, Bring Centres and Pay-to-Use facilities. Responsibility: Local Government Sector
PA13.2	Investigate the potential for circularity of Incinerator Bottom Ash using the by-product or end of waste regulatory mechanisms. Responsibility: EPA and Local Government Sector and Industry
PA13.3	Set circularity criteria for waste tyres in conjunction with the compliance scheme and identify the infrastructure required. Responsibility: Compliance Scheme and DECC
PA13.4	Evaluate the processes and outputs of Material Recovery Facilities, set a goal for the circularity of waste streams and identify process enhancements or alternative processes. Responsibility: EPA, Compliance Scheme, Local Government Sector and Industry
PA13.5	Ensure that sufficient resources are available to review and validate annual returns from collectors and facilities and identify deficits where they exist. Responsibility: DECC and Local Government Sector

## Focus Area 14: Recovery Infrastructure

Target Policy Ref.	Detail
TP14.1	Support the development of pre-treatment capacity for recovery where technically, economically and environmentally practicable in line with the proximity principle.
TP14.2	Support the provision of 200,000 to 300,000 tonnes of additional dedicated thermal recovery capacity for the treatment of non-hazardous residual wastes nationally, to ensure there is adequate active thermal treatment capacity.
TP14.3	Monitor Soil Recovery Facility capacity in the market to ensure adequate and appropriate authorisations are in place, in each region, to satisfy the need for soil recovery capacity.
TP14.4	Support the provision of treatment capacity for non-hazardous construction and demolition waste streams (in particular soils, fines, rubble and concrete).
TP14.5	Support the provision of national capacity for bottom ash from existing thermal treatment facilities, pending the provision of alternative uses which optimise the circularity of this material.
TP14.6	Support the development of circular bioeconomy infrastructure and initiatives that align with the policies of this Plan and the National Bioeconomy Action Plan 2023-2025.
Priority Action Ref.	Detail
PA14.1	Ensure that there is an agreed schedule of planned maintenance shutdowns within the thermal sector to minimise disruption to waste treatment. Responsibility: EPA and Local Government Sector
PA14.2	Set circularity criteria for the output from biological treatment facilities and for soil and other construction and demolition waste streams. Responsibility: EPA and Local Government Sector
PA14.3	Determine the implications of calorific values on thermal capacity with the thermal recovery sector (e.g., waste to energy plants). Responsibility: EPA and Local Government Sector
PA14.4	Maximise the use of Solid Recovered Fuels in the thermal co-processing sector (e.g., cement plants) consistent with licence conditions. Responsibility: EPA and Local Government Sector
PA14.5	Liaise with the EPA on the enforcement of Waste Recovery Licences to avoid disruptions to waste treatment. Responsibility: EPA and Local Government Sector

## Focus Area 15: Disposal Infrastructure

Target Policy Ref.	Detail
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 MSW by 2035.
TP15.2	Ensure the provision of appropriate waste contingency capacity in response to market disruption/interruption and/or events which pose a risk to the environment and/or health of humans and livestock.
TP15.3	Ensure the continuation of the Historic Landfill Remediation Programme consistent with the existing risk based approach.
TP15.4	Encourage appropriate alternative land uses at authorised inactive landfills (un-commenced, permanently closed, or temporarily closed) subject to amendments to existing approvals.
TP15.5	Encourage appropriate land uses at remediated historic landfills which are consistent with environmental protection criteria and which do not compromise the remediation solution.
TP15.6	Develop an integrated and coordinated strategy to respond to the operational and financial challenges associated with landfill aftercare.
Priority Action Ref.	Detail
PA15.1	Prepare the detailed feasibility report for a national waste contingency facility. Responsibility: Local Government Sector
PA15.2	Implement the recommendations of the detailed national waste contingency feasibility report. Responsibility: Local Government Sector
PA15.3	Progress the investigation and remediation of the registered unregulated historic landfills in accordance with the established risk based approach and the necessary statutory approvals. Responsibility: Local Government Sector
PA15.4	Collaborate with the landfill operators to ensure residual municipal waste has priority to the available licensed landfill void capacity over and above other waste streams. Responsibility: Private Waste Operators and Local Government Sector
PA 15.5	The Local Authority Sector will work collectively to examine potential efficiencies around aftercare of landfill sites. Responsibility: Local Government Sector
PA15.6	Liaise with the EPA on the enforcement of Waste Disposal Licences to avoid disruptions to waste treatment. Responsibility: EPA and Local Government Sector

## Focus Area 16: Hazardous Infrastructure

Target Policy Ref.	Detail
TP16.1	Support the development of additional capacity for the treatment of hazardous waste in accordance with the National Hazardous Waste Management Plan to ensure there is adequate active treatment capacity.
TP16.2	Maintain annual capacity for the treatment of asbestos waste to ensure the waste stream is managed and monitor the requirement for additional capacity.
TP16.3	Conduct a review of hazardous waste management capacity and performance during the Covid-19 pandemic with the EPA.
TP16.4	Conduct a business continuity assessment for hazardous waste management capacity with the EPA.
Priority Action Ref.	Detail
PA16.1	Identify hazardous waste streams where there is an associated treatment capacity risk. Responsibility: EPA and Local Government Sector
PA16.2	Facilitate and assist with the establishment of collections for household and small-scale hazardous waste through Civic Amenity Sites and/or via special collections. Responsibility: Local Government Sector
PA16.3	Develop a register of hazardous waste storage / processing/ treatment facilities with a particular focus on business continuity and contingency. Responsibility: EPA and Local Government Sector
PA16.4	Liaise with the EPA on the enforcement of Hazardous Waste Licences to avoid disruptions to waste treatment. Responsibility: EPA





# APPENDIX 11

## Index of Key Deliverables

### Index of Key Deliverables

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	PA5.4			Action			
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.	TP1.5	Action			Support		
3	Continued Waste Prevention Campaigns	The LGS has delivered coordinated national and local waste campaigns on behalf of DECC and will continue to do so with the support of DECC and the EPA.	PA2.1	Action			Support		Support
4	Enforcement of the Bye-Laws	This Plan commits the LGS to more rigorous enforcement of the bye-laws on the segregation, storage and presentation of municipal waste.	PA1.5/PA2.5	Action					

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	CP3	Action			Support		
6	Brown Bin Collection	The LGS will require authorised waste collectors to implement the food and biowaste regulations.	PA4.1		Support				
7	National Decision – Regulation 27	The EPA will publish national decisions on Regulation 27 which will unlock the potential for a reduction in significant amounts of waste and increase in circularity rates annually.	PA8.3					Action	

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	PA8.3					Action	
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.	PA8.4	Action					
10	Participation	The LGS is committed to maximum participation in authorised waste services and will promote participation through targeted awareness and enforcement.	PA1.5/PA2.5	Action					
11	Material Compliance	The LGS and EPA will establish an enabling group to coordinate the delivery of the plan target on material compliance.	National Target 2	Action					Support

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	National Target 3B	Action			Support		
13	Thermal Recovery Capacity	The LGS supports the provision of additional thermal recovery capacity and this Plan provides guidance as to the capacity required.	TP14.2		Support				
14	Disposal Capacity	The LGS supports the retention of existing disposal capacity at landfill and will seek to secure contingency capacity subject to authorisation.	TP15.2		Support				

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	TP14.3	Action					
16	Support Reuse and Repair	The LGS will support Reuse and Repair activities by encouraging innovation, identifying markets and coordinating training.	TP12.1		Support				
17	Monitor Reuse and Repair	The LGS will support the EPA in delivering reuse monitoring data and developing repair data to support this activity.	National Target 3A		Support			Action	
18	Waste Licencing	The LGS support the review of existing Waste Licencing arrangements to include mandatory timelines for approvals.	TP11.4		Support				



Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	CP12	Action					
20	Siting Guidance	The LGS will liaise with ABP, planning authorities and other relevant bodies on the implementation of Siting Guidance for Waste Facilities.	TP11.1	Action					
21	Contingency Capacity	The LGS is committed to the provision of a national waste contingency facility with the support of government.	TP15.2	Action					
22	Local Authority Waste Programme Coordinating Group	The LGS will establish a Waste Programme Coordinating Group to coordinate the response of the sector to existing and future challenges.	CP6	Action					

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	CP6	Action					
24	OP2 Regulation and Enforcement	The LGS will establish Organisational Pillar 2 (OP2) Regulation and Enforcement to consolidate and align waste compliance activities.	CP6	Action					
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.	CP6	Action		Action		Action	

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
26	Enabling Groups	In Year 1 of the Plan the NCGWCE will review all enabling groups / arrangements and make recommendations.	CP6	Action		Action		Action	
27	Stakeholder Engagement	The LGS is committed to continued key stakeholder engagement consistent with the focus areas identified in the Plan.	CP4	Action					
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.	CP4	Action		Action		Action	
29	Business Continuity	The LGS is committed to business continuity across all waste functions subject to the continuation of established supports from government.	CP13	Action					

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	CP13	Action					
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.	TP15.3	Action					
32	CAS Report	Recommendations of the CAS Review including the identification of baseline and additional investment required for the network.	PA4.4	Action					
33	Enforcement Funding	The LGS will review the local authority enforcement funding model to mitigate existing deficits and identify additional enforcement requirements.	CP13	Action					

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	CP5	Action		Action		Action	
35	Communications Strategy Implementation	It is anticipated that an additional €1M will be required annually from government to implement the Circular Economy Communications Strategy.	CP13	Action		Action		Action	
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.	CP13	Action			Support		

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	CP13	Action			Support		
38	Regulation	Additional Investment in the NWCPO will be required from government to deliver incentivised charging for non-household activities.	CP13			Action			
39	Public Investment	The LGS is committed to facilitating reuse and circularity through the CAS network however significant support will be required from government to achieve this outcome.	CP13	Action					
40	Private Investment	The LGS has provided the framework for investment in infrastructure by the private sector in the Plan.	CP13		Support				



Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
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.	CP6	Action		Action		Action	
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.	CP6	Action					
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.	CP6	Action					
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.	CP6	Action					

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
45	Evaluate the impact of work plans on circularity and climate impact	The LGS will evaluate the impact of LGS work plans on circularity and climate action annually.	CP6	Action					
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.	CP11		Support		Support		Support
47	Capacity Monitoring	The LGS will produce a quarterly capacity summary including rMSW and C&D Waste.	CP8	Action					
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.	National Target 3A	Action		Action			
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.	CP8	Action					

Number	Deliverable	Intervention	Corresponding Target, Policy or Action	LGS		DECC		EPA	
				Action	Support	Action	Support	Action	Support
50	Oversight	The RWMPOs will participate in National Waste Oversight Groups including the recommended NCGWCE and report to the CCMA CATCEN Committee on Plan progress and issues.	CP6		Support				
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.	CP6	Action					



## APPENDIX 12

### SEA and AA Mitigation

## SEA and AA Mitigation

Area	Proposed SEA Mitigation	Proposed AA Mitigation
Core Policies	<ul style="list-style-type: none"> <li>CP13: An economic study/cost-benefit analysis is recommended to examine the economic viability of the target policies and priority actions proposed in the Plan. Emerging issues such as trends in healthcare risk waste generation and management and recycling needs for certain waste streams should be considered to inform any capacity/infrastructure needs.</li> </ul>	<ul style="list-style-type: none"> <li>CP2: Any development of new infrastructure, or upgrading of existing infrastructure, arising from the measures and actions prescribed in the CAP must be considered with regards to the Habitats Directive and be subject to AA.</li> <li>CP3: Projects/plans need to be subject to AA process. Legislative provisions need to align/reflect the requirements of the EU Habitats Directive.</li> <li>CP6: Ensure that activities are consistent with the requirements of the Habitats Directive and the need for AA of plans/projects. Ensure that staff are suitably trained in the AA process.</li> <li>CP12: Any enhancement of existing waste facilities or development of new infrastructure must be subject to AA.</li> </ul>
Focus Area One: Commercial Waste	<ul style="list-style-type: none"> <li>Priority Action 1.2: The use of Plan Targets as Key Performance Indicators should be considered in the annual reporting to monitor data capture.</li> <li>Priority Action 1.5: It is recommended that Local Authorities continue to actively engage with the RMCEI process.</li> </ul>	No mitigation prescribed.
Focus Area Two: Household Waste	No mitigation prescribed.	<ul style="list-style-type: none"> <li>TP2.4: Any enhancements to existing collection and segregation systems must be considered with regards to the Habitats Directive. Any infrastructural requirements for additional waste streams should be subject to AA.</li> </ul>
Focus Area Three: Compliance Schemes	No mitigation prescribed.	<ul style="list-style-type: none"> <li>PA3.2: Ensure that all activities arising from the implementation of the review recommendations are consistent with the requirements of the Habitats Directive. Any projects/plans or infrastructural developments that might arise will be cognisant of European Sites and should be subject to AA.</li> </ul>

Area	Proposed SEA Mitigation	Proposed AA Mitigation
Focus Area Four: Collection Systems	<ul style="list-style-type: none"> <li>Target Policy 4.4: Developing an integrated, consolidated and coordinated public waste collection infrastructure network needs to be undertaken in line with all regulatory (planning, licensing, permitting) procedures including the application of EIA and AA processes. Any such aspect of this collection infrastructure the meets the relevant thresholds must apply these procedures.</li> </ul>	<ul style="list-style-type: none"> <li>TP4.2: Ensure that collection systems are consistent with the requirements of the Habitats Directive and the protection of European Sites is appropriately taken into consideration. Any enhancement of existing fixed infrastructure or development of new fixed infrastructure arising from this policy should be subject to AA.</li> <li>TP4.4: Ensure that the network of public waste collection infrastructure is consistent with the siting guidance presented within the Plan and the requirements of the Habitats Directive and the protection of European Sites is appropriately taken into consideration. Any enhancement of existing fixed infrastructure or development of new fixed infrastructure within this network of waste facilities should be subject to AA.</li> <li>PA4.4: Ensure that all activities arising from the implementation of the review recommendations are consistent with the siting guidance presented within the Plan and the requirements of the Habitats Directive and legal protection of European Sites. Any projects/plans or infrastructural developments that might arise should be subject to AA.</li> <li>PA4.5: Ensure that the provision of waste infrastructure is consistent with the siting guidance presented within the Plan and the requirements of the Habitats Directive and the protection of European Sites is appropriately taken into consideration. Any enhancement of existing fixed infrastructure or development of new fixed infrastructure arising from this policy should be subject to AA.</li> </ul>
Focus Area Six: Packaging Waste	No mitigation prescribed.	No mitigation prescribed.



Area	Proposed SEA Mitigation	Proposed AA Mitigation
Focus Area Seven: Single Use Plastic Waste	<ul style="list-style-type: none"> <li>Priority Action 7.1 and 7.3: The use of Key Performance Indicators should be considered in the annual reporting to track the monitoring of the application of these new measures.</li> <li>Priority Action 7.4: The key findings, including success stories and limitations should be published to improve future studies and trials which would lead to a nationwide roll-out.</li> </ul>	No mitigation prescribed.
Focus Area Eight: Construction and Demolition	<ul style="list-style-type: none"> <li>Priority Action 8.1: It is recommended that training on waste and circular materials is developed and applied in any training provided to local authority staff on the implementation of Green Public Procurement criteria for local authority construction and demolition projects and award criteria for such contracts are suitably favoured to operators proposing the use of secondary raw materials.</li> <li>Target Policy 8.3, Priority Action 8.3 and Priority Action 8.5: Local authorities must apply the appropriate resources and training should be provided to local authority planners and enforcement officers on the application of the EPA Best Practice Guidelines for the preparation of Resource &amp; Waste Management Plans.</li> <li>Priority Action 8.2: Training should be provided to relevant local authority engaged in the preparation of Resource &amp; Waste Management Plans for local authority developments.</li> </ul>	No mitigation prescribed.
Focus Area Ten: Hazardous Waste	<ul style="list-style-type: none"> <li>General Mitigation: The results of the campaigns and surveys should be documented to the public. This should document the impact hazardous waste has on society and ecosystems and why waste prevention and proper management is vital to environment and human health.</li> <li>Priority Action 10.1: Focus groups should be considered to demonstrate the potential effectiveness of the awareness campaigns; the findings and feedback could further aid future campaigns.</li> <li>Priority Action 10.3: The findings of the survey and subsequent initiatives and measures should be documented.</li> <li>Priority Action 10.3: Reviews should be undertaken on a scheduled basis to assess the effectiveness of the enforcement regime.</li> </ul>	No mitigation prescribed.

Area	Proposed SEA Mitigation	Proposed AA Mitigation
Focus Area Eleven: Infrastructure Regulatory	<ul style="list-style-type: none"> <li>Priority Action 11.3: The local authority shall ensure that any facility authorised for storage of waste from road maintenance and other local authority construction projects shall be fully consented through both planning and licensing/permitting and that these consents have been subject to EIA and AA as appropriate prior to any such use for these facilities.</li> </ul>	<ul style="list-style-type: none"> <li>TP11.2: Ensure that the development of new infrastructure or upgrading of existing waste facilities would be cognisant of the Habitats Directive and subject to AA and with the siting guidance presented within the Plan.</li> <li>PA11.3: Ensure that all sites/facilities proposed for storage of waste from road maintenance and other local authority construction projects have already/will go through the AA process. Any mitigation required should be built into the design process.</li> <li>PA11.4: Ensure that all SID applications are considered with awareness of the requirements of the Habitats Directive and with the siting guidance presented within the Plan and that specific SID projects are subject to AA.</li> </ul>
Focus Area Twelve: Reuse / Repair Infrastructure	<ul style="list-style-type: none"> <li>Priority Action 12.2: The local authority will ensure that facilitation of reuse and repair services at designated Civic Amenity Sites complies with the relevant planning and permitting regulations and the EIA and AA processes as applicable.</li> <li>Target Policy 12.4 and Priority Action 12.4: The local authority will ensure that any support offered to the development of circular activities and secondary material markets will be contingent on these activities being compliant with all regulatory requirements.</li> <li>Priority Action 12.5: Any authorisation regime developed for reuse and repair activities must have due regard for the application of EIA and AA processes as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>TP12.3: Any development of infrastructure for materials recovery or other advanced pre-treatment of waste must be considered with regards to the Habitats Directive and protection of European Sites and with the siting guidance presented within the Plan. The AA process must be carried out for specific projects/activities where relevant.</li> <li>TP12.4: Ensure that all circular activities are consistent with the requirements of the Habitats Directive and any development of infrastructure associated with these facilities will be cognisant of European Sites and should be subject to AA and with the siting guidance presented within the Plan.</li> <li>PA12.2: Choice of civic amenity sites to facilitate collection of items/materials for reuse should be carried out with an awareness of European Sites and the requirements of the Habitats Directive. Any changes or infrastructural upgrades to existing sites to facilitate reuse should be subject to planning and the AA process.</li> </ul>

Area	Proposed SEA Mitigation	Proposed AA Mitigation
Focus Area Thirteen: Recycling Infrastructure	<ul style="list-style-type: none"> <li>Target Policy 13.1, 13.2, 13.4 and 13.5: The local authority will ensure that any support offered to these operations will be contingent on these activities being compliant with all regulatory requirements.</li> </ul>	<ul style="list-style-type: none"> <li>TP13.1: The development of reprocessing and recycling capacity should be carried out with an awareness of European Sites and the requirements of the Habitats Directive. Any development of new waste infrastructure and upgrading of existing infrastructure for reprocessing and recycling purposes should be subject to planning and the AA process and with the siting guidance presented within the Plan.</li> <li>TP13.2: The development of plastic management infrastructure should be carried out with an awareness of European Sites and the requirements of the Habitats Directive. Any development of new plastic management infrastructure and upgrading of existing facilities for this purpose should be subject to planning and the AA process and with the siting guidance presented within the Plan.</li> <li>TP13.3: The development of recycling capacity and outlets for waste tyres should be carried out with an awareness of European Sites and the requirements of the Habitats Directive. Any development of new waste infrastructure and upgrading of existing infrastructure for the management and recycling of waste tyres should be subject to planning and the AA process and with the siting guidance presented within the Plan.</li> <li>TP13.5: Any activities associated with the provision and maintenance of biological treatment capacity must be considered with regards to the Habitats Directive and protection of European Sites and with the siting guidance presented within the Plan. The AA process must be carried out for specific projects/activities where relevant.</li> </ul>

Area	Proposed SEA Mitigation	Proposed AA Mitigation
Focus Area Fourteen: Recovery Infrastructure	<ul style="list-style-type: none"> <li>Target Policy 14.1, 14.2, 14.4 and 14.5: The local authority will ensure that any support offered to these operations will be contingent on these activities being compliant with all regulatory requirements.</li> <li>Target Policy 14.2: As part of the annual review and reporting, the RWMPO will track national rates of reuse, repair and recycling to allow for the predictions of future residual waste generation and the capacity need for any additional thermal treatment. The scale of development mandated by this policy shall be revised accordingly to ensure that any new recovery infrastructure does not act as a barrier to achieving the Plan targets for 0% waste growth as well as reuse, repair and recycling.</li> </ul>	<ul style="list-style-type: none"> <li>TP14.1: Any activities associated with the provision and maintenance of recovery capacity must be considered with regards to the Habitats Directive and protection of European Sites and with the siting guidance presented within the Plan. The AA process must be carried out for specific projects/activities where relevant.</li> <li>TP14.2: The development of infrastructure to provide thermal recovery capacity for the treatment of non-hazardous wastes must be considered with regards to the Habitats Directive and protection of European Sites and with the siting guidance presented within the Plan. The AA process must be carried out for specific projects/activities where relevant.</li> <li>TP14.4: Any activities or development requirements associated with the provision of treatment capacity for non-hazardous C&amp;D waste must be considered with regards to the Habitats Directive and protection of European Sites. The AA process must be carried out for specific projects/activities where relevant.</li> <li>TP14.5: This policy should be delivered with an awareness of European Sites and the requirements of the Habitats Directive. Any new activities associated with the provision for bottom ash capacity will need to obtain a waste licence from the EPA, which includes a requirement for mandatory AA to be carried out. Any development of new infrastructure or upgrades to existing infrastructure must be subject to planning and the AA process and with the siting guidance presented within the Plan. Design should ensure no connectivity to EU Sites.</li> </ul>

Area	Proposed SEA Mitigation	Proposed AA Mitigation
Focus Area Fifteen: Disposal Infrastructure	<ul style="list-style-type: none"> <li>• Target Policy 15.1: As part of the annual review and reporting, the RWMPO will track national rates of reuse, repair and recycling to allow for the predictions of future residual waste generation and the need for landfill disposal capacity with the aim of reducing demand to meet the EU target.</li> <li>• Target Policy 15.2: The local authority shall ensure that any facility identified for contingency capacity shall be fully consented through both planning and licensing/permitting and that these consents have been subject to EIA and AA as appropriate prior to any such use for this facility.</li> <li>• Target Policy 15.4 and Target Policy 15.5: It is recommended that the local authorities develop a biodiversity strategy specifically to inform any appropriate alternative land uses at authorised inactive landfills or remediated historic landfills to maximise the opportunities for habitat development at these sites.</li> </ul>	<ul style="list-style-type: none"> <li>• TP15.2: Any activities associated with the provision of waste treatment contingency capacity must be considered with regards to the Habitats Directive and protection of European Sites and with the siting guidance presented within the Plan. The AA process must be carried out for specific projects/activities where relevant.</li> <li>• PA15.2: Any waste facility adopted to provide national contingency capacity will require planning and licencing and should be subject to EIA/AA during the planning process. Must be fully controlled in line with the landfill directive etc.</li> </ul>
Focus Area Sixteen: Hazardous Infrastructure	<ul style="list-style-type: none"> <li>• Target Policy 16.1: The local authority will ensure that any support offered to these operations will be contingent on these activities being compliant with all regulatory requirements.</li> <li>• Priority Action 16.2: Any establishment of infrastructure to facilitate collections for household and small-scale hazardous waste through Civic Amenity Sites should be subject to the relevant planning and waste regulations or, if below the relevant thresholds, subject to a local risk assessment to mitigate any pathways from these materials to the environment.</li> </ul>	<ul style="list-style-type: none"> <li>• TP16.1: Ensure that the NHWMP secures a requirement that all actions arising with respect to the development of waste infrastructure takes into account the legal protection of European Sites; including the application of AA processes with respect to any subsequent plans or projects which emerge as part of the development of that infrastructure.</li> <li>• PA16.2: Ensure that all activities arising with respect to the collection and management of household and small-scale hazardous waste take into account the Habitats Directive and the legal protection of European Sites. Any projects or infrastructural developments required should be subject to AA.</li> </ul>



## APPENDIX 13

### Consultation Report



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# 1 INTRODUCTION

The Regional Waste Management Planning Offices (RWMPO), on behalf of the Local Government Sector (LGS), have published the draft National Waste Management Plan for a Circular Economy (hereafter 'the Plan') in accordance with Section 22 of the Waste Management Act 1996, as amended, and most recently amended by the Circular Economy Act 2022<sup>1</sup>.

The Plan was published for consultation in accordance with Section 23 of the Waste Management Act 1996, as amended, for a period of not less than two months from the 3rd May to the 5th July 2023.

Submissions from third parties (both members of the public and external organisations) on the contents of the Plan and the associated Strategic Environmental Assessment and Appropriate Assessment were sought during the consultation period. Submissions received have been collated and reviewed and the issues raised have been considered in the process to complete the final Plan.

The RWMPO also undertook extensive internal engagement within the LGS with Elected Members and the various bodies with responsibility for waste and the circular economy. Feedback from these engagements has also been collated, reviewed and considered in the process to complete the final Plan. The majority of the submissions received were supportive of the Plan and the policy framework presented; therefore, the requirement for extensive additions or modifications to the policies and actions presented is limited.

Based on the submissions received and the engagement undertaken, this report outlines proposed updates and alternations to the Plan to be completed prior to the making of the final Plan. The report is structured as follows:

- **Section 2: Approach to Consultation** details the procedures for how the Plan was made available and the arrangements for submissions and the recording of responses.

- **Section 3: Alterations to the Plan** includes an overview of the responses to submissions that trigger a potential alteration to the policy framework of the Plan along with recommendations for the final Plan. This section of the report has been structured in line with the layout of the Plan with responses to submissions aligned with the relevant volume or focus area of the Plan.

A more detailed summary of all submissions received has been collated into a separate consultation database included as **Appendix A** to this report.

<sup>1</sup> Circular Economy and Miscellaneous Provisions Act 2022. Link: <https://www.irishstatutebook.ie/eli/2022/act/26/section/26/enacted/en/html>





## 2 APPROACH TO CONSULTATION



**"HOW CAN WE  
MANAGE WASTE  
BETTER?"**

**FIND OUT, AND TELL US  
WHAT YOU THINK**

**THE NATIONAL WASTE  
MANAGEMENT PLAN  
FOR A CIRCULAR  
ECONOMY**

**...VIEW IT ON MYWASTE.IE**

### 2.1 CONSULTATION PLATFORMS

The Plan documents were made available to all interested parties through the following platforms:

- A dedicated webpage was provided as the online consultation platform for the Plan which was available at: <https://www.mywaste.ie/national-waste-plan/>; and
- Hard copies of the Plan documents were made available at the offices of each of the Lead Authorities (Dublin City Council, Limerick City and County Council/Tipperary County Council and Mayo County Council).

The consultation period was launched on Wednesday the 3rd May 2023 and was promoted through a press release and a series of statutory notices in national newspapers.

The consultation period was also promoted through newspaper advertisements, a radio campaign (including advertisements and interviews) and through social media and other digital platforms to increase awareness of the consultation process and to ensure a comprehensive response.

The consultation period continued until the 5th of July 2023 to ensure compliance with the 'not less than two months' as stipulated in Section 23 of the Waste Management Act 18996, as amended.

### 2.2 SUBMISSIONS

Submissions were invited by the following means:

- Directly online through the text portal function on the <https://www.mywaste.ie/national-waste-plan/> website;
- Via email directly to the email address: [submissions@nationalwasteplan.ie](mailto:submissions@nationalwasteplan.ie); and
- By post to the Lead Authorities.

All submissions received were organised into a single database for evaluation and the key themes were recorded. All issues raised in the submissions have been considered in the process of the completion of the final Plan.



## 2.3 ENGAGEMENT

### 2.3.1 Engagement with the Local Government Sector

In addition to the arrangements for submissions available to the general public and external organisations, the RWMPO also undertook a series of direct engagements with internal groups within the LGS with responsibility for waste management and the circular economy. These groups included the following:

- Regional Steering Committees & Regional Teams;
- Senior Management Teams; and
- Lead Authority Chief Executives and Directors.

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

### 2.3.2 Engagement with Elected Members and other Representatives

As part of the engagement with the LGS, the RWMPO met with Elected Members, NGO's and Community representatives through the following groups:

- Strategic Policy Committees (SPCs);
- Development Committees; and
- Full Council Meetings and Plenaries.

Feedback from these engagements was collated and reviewed and has been taken into consideration in the process of the completion of the final Plan.

### 2.3.3 Engagement with other Parties

During the consultation period the RWMPO also engaged directly with a number of external parties to clarify policy positions in the Plan and to capture the views of these parties. Direct engagements were undertaken with the following parties and/or at the following events:

- The Irish Waste Management Conference 2023;
- National Communications Group of DECC;
- International Circular Economy Hotspot 2023;
- ACR+ International Event 2023;
- The three Regional Planning Assemblies;
- Cré Members;
- EPA Circular Economy Team;
- Climate Action Regional Offices; and
- The Environmental Services Training Group.

Feedback received during these engagements has been used to supplement or clarify written comments from these groups and all issues raised have been taken into consideration in the process of completion of the final Plan.

## 2.4 SEA AND AA CONSULTATION

The Environmental Report for the Strategic Environmental Assessment and the Natura Impact Statement for the Appropriate Assessment of the Plan were made available on the same platforms outlined above. Both documents were open to public comment during the consultation period in addition to the formal consultation with statutory consultees and informal transboundary consultation.

## 2.5 PEER REVIEW

Volumes I to III of the draft Plan have also been subject to peer review by ACR+ who are a Belgian based international network of cities and regions sharing the aim of promoting sustainable resource management and accelerating the transition towards a circular economy. The main focus of the peer review was to assess the following areas:

- The alignment of the Plan with the current and upcoming European policies and how upcoming European policies might impact the Delivery Roadmap (Volume III);
- The adequacy of the policy responses and actions with the ambition of the Plan and the quantitative targets and actions that could be considered in addition or support to the ones identified; and
- The relevance of the selected targets with the more general ambitions regarding circularity and climate change.

The peer review concluded that the Plan was comprehensive, well-organised and structured and aligned with the current European Policy. Specific comments were noted in relation to targets as well as core and targeted policies and these have been taken in to consideration in the process of completion of the final Plan.



# 3 SUBMISSIONS AND ALTERATIONS TO THE PLAN



### 3.1 OVERVIEW

A total of 381 no. submissions were received during the consultation period and the submissions received can be categorised into the general public (accounting for 90% of all submissions) and External Organisations. Each submission was first allocated a reference number and then organised by date, type (direct email or transfer) and summarised in an Excel spreadsheet database (included in **Appendix A**). After the initial processing an analysis was undertaken to determine the alignment of submissions with the volumes of the Plan.

**Figure 3.1** provides a graphical representation of submissions received and their alignment with the volumes, core policies and focus areas of the Plan (note: each of the 381 submissions received raised multiple issues and the numbers presented are an approximation of the issues relating to each volume, core policies and focus areas).

The figure shows that the core policies, collection systems, recycling infrastructure, packaging and compliance schemes each generated over 100

comments and combined these account for two thirds of all issues raised.

Private citizens generally had a shared view of the key thematic drivers required to manage waste and increase circularity, whereas external organisations made more detailed and specific references to targeted policies and priority actions that may improve the implementation and outcomes of the Plan. Each of these positions is addressed in greater detail in the following sections of this report.

### 3.2 GENERAL ALTERATIONS

A number of general alterations will be made across all volumes of the Plan based on broader comments received during consultation. These alterations are to be taken as read across all subsequent sections in this report and are as follows:

- All typographical or factual errors highlighted during consultation will be addressed throughout all volumes;
- Any relevant change or update to the policy or legislative framework for the Plan since the consultation launch in May 2023 will be identified and addressed;

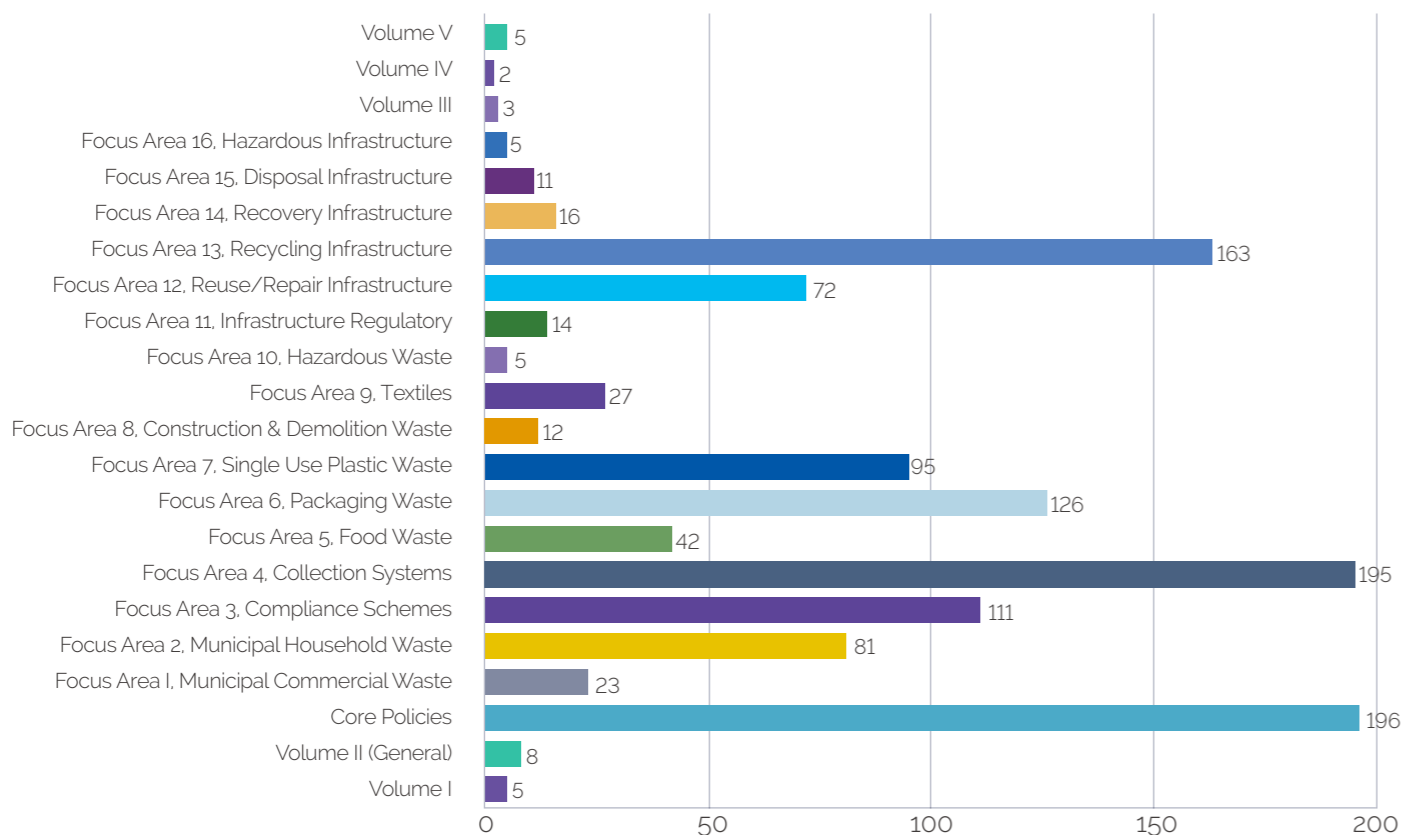


Figure 3.1: Summary of the Number of Submissions per Topic

### 3.4 VOLUME I CURRENT SITUATION AND CHALLENGES

#### 3.4.1 Part A: The Rules

There were no submissions received from the general public in relation to Volume I Part A.

In their submission, the EPA recommends that all references to 'Article 27' are changed to 'Regulation 27' (by-products) and references to 'Article 28' are changed to 'Regulation 28' (End-of-Waste) and that all reference to 'road plannings' is changed to 'site-won asphalt (road plannings)'.

In their submission, WEEE Ireland suggested that Part A Chapter 1 should also include reference to the set of initiatives proposed by the Commission including the proposal for a Regulation on Eco-design for Sustainable Products (ESPR), the proposal concerning batteries and the proposal for a Directive on common rules promoting the repair of goods.

The Plan will be updated to include all relevant policy developments since publication of the draft Plan for consultation and this includes these policy instruments.

#### Revisions in final Plan

- All references to Article 27 will be changed to Regulation 27 (by-products) and all references to Article 28 will be changed to Regulation 28 (End-of-Waste) in Part A and throughout the Plan; and
- The European Policy direction documented in Section 1.2 of Part A will be revised to include any updated policy or legislative framework for the Plan since the consultation launch in May 2023 including those policy instruments noted by WEEE Ireland.

#### 3.4.2 Part B: The Landscape

There were no submissions received from the general public in relation to Volume I Part B.

The Irish Waste Management Association (IWMA), Stream Bioenergy and Cré made similar comments in relation to Section 5.4.1.1 on Composting, Anaerobic Digestion and Bio-stabilisation. All parties challenge the statement that there is sufficient capacity in this market to meet the current and future demands. This challenge has merit and the analysis in Part B will be revised to better reflect the current market situation.

- All updated national statistics on material streams, as reported by the EPA, since the consultation launch will be reflected in the Plan;
- Any factual errors noted in treatment capacity or change to permitted treatment capacity, following EPA or planning consent, since the consultation launch will be addressed;
- Revisions to treatment capacities and updates to policy frameworks will be reflected in waste generation and treatment projections presented;
- Responses relating to the assignment of responsibility for Priority Actions in Volume II or Key Deliverables in Volume III will be actioned as appropriate;
- References to the Local Authority Sector (LAS) throughout the Plan will be revised to the term Local Government Sector (LGS); and
- Several submissions cited confusion in relation to the presented alignment of policies and actions within the focus area fact sheets in Volume II. For example, the alignment on the sheet of TP1.1 and PA1.1 which in some cases are aligned in purpose (i.e. behaviour change, enforcement, etc.) but in others are unrelated but readers have assumed an interdependency. It is recommended that this is addressed in the final Plan to prevent further confusion.

The following sections of this report provide an overview of the key issues raised in relation to each part of the Plan and highlight the material alterations proposed.

### 3.3 THE EXECUTIVE SUMMARY

None of the submissions received directly referenced the Executive Summary.

#### Revision in final Plan

While no submissions addressed the Executive Summary, this part of the Plan will be updated as required to account for alterations made elsewhere in the Plan.

The Rediscovery Centre requested that the centre's role is recognised and noted in Section 4.1 of Volume I of the Plan on Reuse, Preparation for Reuse and Repair. This is an appropriate inclusion and the Rediscovery Centre role will be noted within Section 4.1 in the final Plan.

Cement Manufacturers Ireland (CMI) advise that the operational capacity for co-processing of wastes at cement plants may increase in the future 400,000 tonnes of SRF annually by 2030. This potential increase in capacity is fundamental to the Plan and will be noted in Section 5.4.2 and will inform the capacity projections in Volume III.

In relation to Section 5.8 on Contingency Capacity, the IWMA suggest that the best way to provide contingency capacity in Ireland is through existing operational facilities, such as the authorised provision at Knockharley. While the Plan does not specify where such a facility may be located, a note will be added to confirm that such capacity can also be provided by the private sector.

The IWMA and Cré made comments on the thresholds for Nationally Important Infrastructure in Table 5.15 of Section 5.9. This table will be removed from Volume I (and Volume III) and relocated to Volume II under Core Policy 12 where the consultation responses are now addressed in Section 3.5.2.

#### Revisions in final Plan

- The analysis of biological treatment capacity noted in a number of submissions will be revised in Section 5.4.1.1 to better reflect the current capacities and inform the changes, if any, to the policies and actions in Volume II;
- The analysis of thermal treatment capacity in Section 5.4.2 will include a note on the projected increase in capacity available at the cement plants by 2030;
- The suggestion that Contingency Capacity could be delivered by the private sector will be acknowledged in the text in Section 5.8; and
- Table 5.15 of Section 5.9 defining the criteria for Nationally Important Infrastructure will be removed and included in Volume II with modifications to account for consultation responses.

### 3.4.3 Part C: The Resources

There were no submissions received from the general public on Part C with limited comments from external organisations.

#### Revisions in final Plan

While no submissions were raised directly on Volume I Part C, this part of the Plan will be revised as required to account for changes made elsewhere in the Plan.

## 3.5 VOLUME II POLICY RESPONSES AND ACTIONS

### 3.5.1 Part A: Core Positions

The stated ambition of the Plan for 0% total waste growth per person over the Plan period was generally welcomed by organisations (including the EPA) as suitably ambitious while members of the public stated that it is not ambitious enough. The national targets presented in the Plan were generally welcomed by external organisations. One internal comment from the LGS suggested that the targets should be dynamic to allow for annual revision as required to ensure the ambition of the Plan is achieved. This is a valid comment and a note to this effect will be included in the final Plan. In addition, there were specific internal and external organisation comments on some of the national targets and these are summarised in the following paragraphs.

#### National Target 1A Residual Municipal Waste: 1% Reduction in rMSW per person per year

In the Plan the target is an annual reduction of 1% per annum. Internal commentary from the LGS suggested that consideration should be given to revising the current annual target to an aggregated target over the 6-year Plan period. Such a revision would not alter the impact of this target and would also insulate the target against any fluctuating annual dynamics in the market. As such, National Target 1A will be revised in the final Plan from the current annual target to a Plan target over the six years.

### National Target 2 Material Compliance: 90% Material Compliance

In September 2023, the EPA published the results of the 2022 waste characterisation studies<sup>2</sup> of household and commercial bins and this report highlights the following:

- 36% (household) and 26% (commercial) of materials found were in the correct bin for the Residual Bin;
- 64% (household) and 76% (commercial) of materials found were in the correct bin for the Dry Recycling Bin<sup>3</sup>; and
- 95% (household and commercial) of materials found were in the correct bin for the Organic Bin.

These new results prompt a revision of National Target 2 with a set of specific targets applied for individual bins as follows:

- Segregation practices are poor in the Residual Bin and an ambitious material compliance target is required to drive segregation and reduce contamination of other bins with residual material. A target of 90% material compliance will be implemented which represents a 10% increase on baseline per annum to achieve 90% material compliance rate by the end of 2030 (2022 baseline rate of 36% in household and 26% in commercial bins);
- For the Dry Recycling Bin, the target of 90% Material Compliance from the draft Plan is still appropriately ambitious and will be retained; and
- Given the high level of compliance observed in the household Organic Bin, it is proposed to remove this stream from the material compliance target. National Target 2 will be revised into separate material compliance targets for the Residual and Recycling bins.

### National Target 3A Reuse: 10kg per person per year

Since publication of the draft Plan, the EPA has published the first set of national reuse statistics for Ireland as required under the revised Waste Framework Directive and Commission Implementing Decision (EU) 2021/19.

The EPA report that the average annual reuse rate per person in Ireland is 10.6kg per person in 2021<sup>4</sup>. This 2021 baseline exceeds National Target 3A set in the draft Plan of 10kg per person and, as such, a suitably ambitious revision to this target is required to drive reuse.

This target will be revised to 20kg per person per annum in the final Plan.

### 3.5.2 Part B: Core Policies

A significant number of submissions related to the 13 core policies presented in the Plan. The public responses largely welcomed CP1 on protecting the environment, CP3 on updating policy and legislation, CP4 on collaboration and CP5 on delivering effective behaviour change. This positive response affirms that the policies are largely aligned with public expectations.

Target	Revisions in final Plan
<b>National Target 1A: Residual Municipal Waste</b>	This annual target will be revised to a target over the Plan period as follows: <b>1% Reduction in rMSW per person per year</b> <b>6% Reduction in rMSW per person by 2030</b>
<b>National Target 2: Contamination</b>	This target will be modified in the final Plan into two separate, but parallel targets as follows: <ul style="list-style-type: none"> <li>• <b>Target 2A: 90% Material Compliance through Segregation in the Dry Recycling Bin; and</b></li> <li>• <b>Target 2B: 90% Material Compliance through Segregation in the Residual Bin by 2030 through annual 10% increases in material compliance.</b></li> </ul>
<b>National Target 3A: Reuse</b>	The following changes are recommended for this target and baseline: <ul style="list-style-type: none"> <li>• Target: <del>10</del> <b>20</b>kg per person per year</li> <li>• Baseline <del>6.62</del> <b>10.6</b>kg per person (<del>2020</del><b>2021</b>)</li> </ul>

<sup>2</sup> Link: <https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/waste-characterisation/>

<sup>3</sup> Note: The EPA reports 'contamination' separately to items that are not in the correct bin. For example, for the household recycling bin, 36% of materials identified should not have been in the Recycling bin but 26% of this material could have been segregated into the Residual bin, the Organic bin or sent to bring centres. Only the remaining 10% of material is categorised as 'contamination'.

<sup>4</sup> Link: <https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/reuse/>



Similarly, the submissions from external organisations largely welcomed the core policies but there were a number of suggested revisions to further enhance the scope of these policies.

ACR+ noted in the peer review report that the need to better understand certain behaviours and perceptions of citizens and other waste producers and to address them more effectively in communication or other types of responses may also be through polls, survey, focus groups, or by making field analysis of actual behaviours for the different waste collection processes. This need to evaluate opinions that inform behaviour is important and CP5 has been reworded accordingly.

The EPA recommended that the wording of CP7 on innovation should be broadened beyond 'the waste sector' and beyond a focus on the management of non-kerbside wastes, to reflect the need for research and innovation to inform and support the circular economy transition across many sectors. This is a valid comment and extends the scope of innovation supported by this policy and this change will be actioned.

The EPA welcomed the inclusion of CP10 on Green Public Procurement, but suggested a small edit to account for the programme for implementation in the Programme for Government: Our Shared Future (2020). Again, this comment is accepted and will be actioned in the final Plan.

Core Policy CP12 relates to Nationally Important Infrastructure and is supported by criteria for such infrastructure shown in Volume I (Table 5.15) and Volume III (Table 3.1). For clarity, the tabled criteria for Nationally Important Infrastructure will be removed from Volume I and III and included in Volume II under the CP12 heading. This revision will assist the reader in referencing the relevant criteria under the policy.

The following specific external organisation comments were noted in relation to CP12:

- Generally, CP12 and the associated criteria were welcomed but the IWMA and Cré suggested a reduction to the current threshold for biological treatment (90,000 tonnes per annum) to a lower threshold of 50,000 tonnes per annum.
- CMI requested the exclusion of the 'Note' to specifically exclude co-processing at cement plants from the criteria for Nationally Important Infrastructure. CMI suggest that the exclusion of cement plants from the definition would prevent

future applications by members to increase capacity to accept alternative fuels and raw materials, which will be essential to achieve carbon dioxide emissions reduction and to meet circular economy objectives.

- In addition, the Regional Assemblies noted that there was a need to include criteria for regionally important infrastructure to facilitate the capacity enhancements necessary to achieve the NPF objective of Balanced Regional Development.

Each of these three submissions are relevant and will be actioned in the final Plan through the revision of the wording of CP12 to include for regionally important infrastructure and the inclusion of a set of defined thresholds for nationally and regionally important infrastructure.

ACR+ suggested that CP13 on funding the Plan could be enhanced by adding reference to the foreseen taxes and economic instruments that may also contribute to the funding of the Plan.

Core Policy	Revisions in final Plan
<b>CP5: Changing Behaviours</b>	Based on the ACR+ comments, this policy is reworded as follows: <b>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.</b>
<b>CP7: Innovation</b>	Based on the EPA recommendations, it is proposed to revise CP7 as follows: Encourage and support further research and innovation in the transition to a circular economy. <del>across the waste sector with a particular focus on the management of non-kerbside waste streams.</del>

Core Policy	Revisions in final Plan
<b>CP10: Green Public Procurement</b>	Based on the EPA recommendations, it is proposed to revise CP10 as follows: Reinforce the consistent application of Green Public Procurement criteria in local authority contracts to ensure that public spending is aligned with the policies of this Plan <b>and the Green Public Procurement Strategy and Action Plan.</b>
<b>CP12: Nationally Important Infrastructure</b>	Based on the commentary from the Regional Assemblies, CP12 will be updated to include for Regionally Important Infrastructure as per the revision below and supported with the inclusion of the criteria listed in <b>Table 3.1:</b>  The Plan recognises and supports the need for nationally <b>and regionally</b> important waste infrastructure, including infrastructure of the type, scale and proximity essential to maintain waste services and infrastructure that contributes to the ambition and policies of the Plan.
<b>CP13: Funding this Plan</b>	Based on the ACR+ comments, this policy is reworded as follows: The Plan seeks to attract funding, <b>including from relevant taxes and economic instruments</b> to support initiatives and projects that underpin business continuity, core and targeted policies and priority actions. Any project or initiative arising from the implementation of this Plan will take account of appropriate principles including the polluter pays principle.

Table 3.1: Criteria for Nationally **and Regionally** Important Infrastructure

Treatment	National Criteria and Threshold
Pre-Treatment Infrastructure	Pre-treatment infrastructure with a capacity greater than 100,000 tonnes per annum.
Recycling Infrastructure	Recycling infrastructure with a capacity greater than 100,000 tonnes per annum.
Recycling Infrastructure (Composting and Anaerobic Digestion)	Recycling infrastructure with a capacity greater than 90,000 tonnes per annum.
Thermal Treatment of MSW	Dedicated* thermal treatment plants with a capacity greater than 100,000 tonnes per annum. <b>Note: This excludes co-processing at cement plants.</b>
Non-hazardous Landfill	Landfills with a capacity greater than 100,000 tonnes per annum.
Soil Recovery Facilities	Soil recovery facilities with a capacity greater than 250,000 tonnes per annum.
Treatment	Regional Criteria and Threshold
Pre-Treatment Infrastructure	Pre-treatment infrastructure with a capacity greater than 50,000 tonnes per annum.
Recycling Infrastructure	Recycling infrastructure with a capacity greater than 50,000 tonnes per annum.
Recycling Infrastructure (Composting and Anaerobic Digestion)	Recycling infrastructure with a capacity greater than 50,000 tonnes per annum.
Soil Recovery Facilities	Soil recovery facilities with a capacity greater than 100,000 tonnes per annum.



### 3.5.3 Part C: Focus Areas

This part of the Plan is subdivided into the 16 focus areas which are categorised as operational, material stream, and infrastructure areas. Submissions for each focus area are considered in the following sections.

#### 3.5.3.1 FA1 Municipal Commercial Waste

The general comments from the public and external organisations on this focus area included themes such as the primacy of prevention, the need for the hospitality sector, as well as others, to be more proactive in adopting best practice and the need for optimised and enforced collection systems to improve segregation. The comments are aligned with the direction of the policy position on municipal commercial waste and the need for action and, as such, there are no revisions to the policies and actions required based on these comments.

External organisation submissions included specifics on policies and actions for this focus area but typically these related to the assignment of responsibilities for actions. Following LGS comments there is a minor revision to TP1.3 to align the text of this policy with the focus area title.

CIWM Ireland noted the importance for any information campaigns and projects to be coordinated both across agencies and with the wider group of stakeholders, particularly prevention, reuse and repair practitioners involved in this area. The need for coordination is central to Core Policy 4 on collaboration and an update to the relevant awareness action (PA1.1) will be included.

Policy/Action	Revisions in final Plan
<b>TP1.3</b>	Revise the wording of this policy for consistency with the FA title: Strengthen the monitoring and accurate measurement of non-household <b>commercial</b> municipal waste flows.
<b>PA1.1</b>	It was recommended to revise the wording of PA1.1 as follows: <b>Collaborate with other agencies</b> to develop and deliver targeted awareness campaigns and projects to improve behaviours on prevention reuse and repair in non-household settings.

#### 3.5.3.2 FA2 Municipal Household Waste

Submissions received from the general public on municipal household waste largely related to the cost of waste services, the need for more proximate recycling centres, the difficulty in managing wastes at apartments, the need for education and advertising campaigns and the need for more rigorous enforcement. With the exception of cost, which is outside the remit of this Plan, each of the remaining areas of concern are addressed in the Plan and these comments largely endorse the need for the policy positions and actions presented in the Plan.

CIWM Ireland made comments on behaviour change, types of collection bins, brown bill roll out, source segregation in other jurisdictions and clarity on waste costs, all of which are relevant to and support the policies and actions presented in the Plan but there are no revisions required in light of these comments.

The EPA commented that the EPA's focus on behavioural change campaigns targeting households will link to the role in leading the national waste prevention programme, insights from behavioural insights studies and insights from waste statistics and waste characterisation studies. This clarification is valuable in setting the context for the Plan and is noted in Volume I, but does not warrant the revision of the policies and actions listed for this focus area in Volume II.

Policy/Action	Revisions in final Plan
	None of the submissions received result in a need to specifically revise the wording of any of the Targeted Policies and Priority Actions for this focus area and no changes will be actioned.

#### 3.5.3.3 FA3 Compliance Schemes (Extended Producer Responsibility)

The predominant theme raised by the public in this focus area related to the increased role of deposit return schemes (DRS) for highly visible waste streams such as beverage packaging comprising plastics, glass, aluminium, and coffee cups. DRS and the coffee cup levy are on track for national implementation and are supported by this Plan. The public also placed significant emphasis on packaging, in particular in the highly visible retail sector, which is somewhat managed through voluntary engagement in a compliance scheme and supported by this Plan.

A number of valuable external organisation comments were raised such as the Irish Food Packaging Alliance encouraging the greater adoption of eco-design in packaging (as per TP3.2) and the Rediscovery Centre view that reuse and preparation for reuse practitioners are included in the design of any EPR schemes (supported through TP3.3).

WEEE Ireland made a number of comments such as collaboration on information campaigns (supported under action PA3.1), the inclusion of mandatory handover of WEEE to EPR Schemes from all waste sites (supported under action PA3.2 from CAS), a standalone scheme for PV panels (may be actioned under TP3.3) and expansion of the eco-modulation programme to other schemes (supported under action PA3.4).

Given that external organisation comments raised are catered for within the Plan for compliance schemes, no significant revisions to the Plan policies and actions are required.

Policy/Action	Revisions in final Plan
	None of the submissions received result in a need to specifically revise the wording of any of the Targeted Policies and Priority Actions for this focus area.

#### 3.5.3.4 FA4 Collection Systems

A significant number of submissions related to collection systems included revising bin sizes, changing collection times to non-peak hours, expanding collection routes, increasing collection frequency, increased availability of brown bins and segregated glass collection. The expansion and enhancement of the kerbside collection system is a key focus in this Plan and the policies and actions presented reflect the need for action as noted by the general public.

There were a significant number of public comments relating to the municipalisation of the kerbside waste collection system; however, the current national legislative framework does not support re-municipalisation and such a significant market change would require legislative intervention which is outside the scope of this Plan.

External organisation submissions on the targeted policies and priority actions for this focus area included very specific comments such as the segregation of the main consumer plastic types, the collection of apartment waste through the provision of a universal standardised service, the continuing financial support for WEEE and battery management at CAS and the need for collection systems that facilitate reuse. The targeted policies for this focus area are sufficiently broad as to facilitate the inclusion of the suggestions with no requirement to revise the wording of policies.

The only action for this focus area is to correct the section title under the heading 'What is it?' as noted below.

Policy/Action	Revisions in final Plan
Revision to the section titled 'What is it?' in the heading	Revise text as follows: <del>To maintain and improve existing waste collection systems and provide viable alternatives for waste streams not serviced.</del> <b>Collection systems provide for the capture of waste materials and include the preliminary sorting and storage of materials to facilitate transport to treatment facilities.</b>

### 3.5.3.5 FA5 Food Waste

The overriding commentary from the general public on this area was the urgent need to tackle the consumption of food and the prevention of food waste. Reducing consumption was considered the primary driver in reducing the generation of waste. Other comments sought dedicated food/organic waste collection systems, promotion of food sharing platforms, better practice in the retail and hospitality sectors and greater enforcement of the Food Waste Regulations. These comments echo the key considerations that are highlighted in Volume I and in the EPA reporting on food waste and, as such, these comments are addressed within the policy framework within the Plan.

The EPA had several comments and recommendations on this focus area given its lead role for implementation of the national food waste prevention programme. The EPA also cited the key supporting policy for this focus area as the National Food Waste Prevention Roadmap and the Food Waste Charter and noted the need for collaboration in awareness campaigns such as the Stop Food Waste campaigns. To reflect the EPA comments, there are a number of changes to policy TP5.2 and also the 'purpose' text in the header to better reflect the supporting role of the LGS to the EPA in this focus area.

External organisation comments were broadly supportive with no further changes required to the policies and actions listed in the Plan. Some commentary was received in relation to the overlap between food waste and the bioeconomy but this is addressed under Focus Area 14 Recovery Infrastructure in **Section 3.5.3.14**.

Internal LGS feedback during engagement two issues to be addressed as follows:

- Action PA5.3 requires a minor update to reflect that this action has moved past the procurement phase; and
- Introduction of a new action PA5.6 to incentivise the indigenous composting or AD sector to treat food waste and maximise recovery of energy from this material.

Policy/Action	Revisions in final Plan
<b>Revision to the section titled 'Purpose' in the heading</b>	Revise the purpose text in the header of the FA worksheet as follows: To <b>support the prevention of food waste</b> in line with the UN SDG target to halve per capita global food waste by 2030 and to implement the National Food Waste Prevention Roadmap.
<b>TP5.2</b>	Revise the wording of TP5.2 as follows as per the EPA recommendation: Coordinate the response of the local authority sector to the <b>Food Waste Charter and the</b> specific sectoral obligations contained in the National Food Waste Prevention Roadmap including regulatory and awareness activities.
<b>PA5.3</b>	This action to be revised to reflect the current status: Manage the <b>procurement, delivery and monitoring programme</b> for the national rollout of Food Waste Separation Packs to households.
<b>PA5.6</b>	Introduce a new policy as follows as per the WERLA recommendation: <b>Explore options to improve the harmonisation of the renewable feed in tariffs across the island of Ireland to incentivise the indigenous treatment of food/biowaste.</b>

### 3.5.3.6 FA6 Packaging Waste

A significant number of submissions were received from the general public on packaging with common themes including the prevention of packaging, the need for a ban on non-recyclable packaging, support for reusable packaging, the value of deposit return schemes as well as highlighting the obligations on manufacturers and retailers to reduce packaging at source. Each of these issues are addressed within the policies and actions for packaging in the draft Plan and these comments reinforce the view that the Plan is suitably comprehensive on these issues.

The IFPA and VOICE noted significant medium term challenges facing the packaging sector under the upcoming Packaging and Packaging Waste Regulations<sup>5</sup> which will ensure that all packaging on the EU market is reusable or recyclable in an economically viable way by 2030. While these measures will take effect outside the timeframe of this Plan (post 2030), it is considered prudent that this future direction is reflected in the Plan both in Volume I (as part of the policy update) and by revising PA6.2 and PA6.4 to include references to future commitments.

Other comments on this focus area were positive and supported the Plan positions or made technical comments of note but there are no further revisions to the policies and actions.

Policy/Action	Revisions in final Plan
<b>PA6.2</b>	PA6.2 is to be revised as follows with a more forward looking focus: Promote best practice <b>and raise awareness of future obligations</b> in the retail sector <b>on reducing packaging waste</b> including in-store packaging collection systems, deposit return schemes, promotion of reusable packaging and product refills.
<b>PA6.4</b>	As above, PA6.4 is to be revised as follows with a more forward looking focus: PA6.4 Promote the use of recycled materials in packaging with designers and manufacturers <b>to support the transition to the requirements of the revised Packaging and Packaging Waste Regulations.</b>

### 3.5.3.7 FA7 Single Use Plastic Waste

As a subset of packaging waste, there was a degree of overlap between the comments received on Single Use Plastic (SUP) waste. Much of the commentary from the general public on this topic related to plastic bottles and the need for public water fountains to prevent generation as well as recycling facilities and deposit return schemes to capture this stream. More general comments related to outright bans or levies on SUP materials, product refills as well as the provision of sustainable and biodegradable alternatives. As with packaging, the key issues raised by the public have been addressed in the Plan.

There were limited external organisation comments on this focus area and comments received were generally supporting of the Plan measures. A minor revision to PA7.2 is required to better reflect the LGS role in controlling events through the licensing process.

Policy/Action	Revisions in final Plan
<b>PA7.2</b>	Revise the wording of this action as follows: Implement best practice with regard to single use plastic in the <b>licensing of</b> hospitality events and community sectors and prepare best practice guidelines for the sector for the elimination of single use plastic.

<sup>5</sup> Proposal for a regulation of the European Parliament and of the Council on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC. Link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022PC0677>

**3.5.3.8 FA8 Construction and Demolition Waste**

There were limited submissions made on construction and demolition waste by the general public but the key theme raised related to the need for innovation in the sector to increase the recycling of construction wastes into other construction materials (both aggregates as well as other materials such as pallets). Financial incentives/penalties on performance as well as enforcement were also noted. Each of these areas are addressed in the policies and actions in the Plan and no specific revision is required.

The Ireland Brownfield Network (IBN) suggested a number of changes to the Regulation 27 process such as independent review and application to a wider remit of soil and stone materials but such changes are outside the scope of this Plan.

The IBN and the Green Party suggested greater regulation of construction projects but this is currently addressed through PA8.4 which requires wastes to be documented in a transparent manner and regulated through planning and no further additions are required.

Internal LGS feedback suggested minor amendments to PA8.4 and PA8.5 to address construction projects rather than sites as a more appropriate term and this is actioned.

Policy/Action	Revisions in final Plan
<b>PA8.5</b>	Based on internal review the following changes are noted: Explore the potential to segregate waste streams in mixed waste skips to minimise contamination and maximise reuse, recycling and circularity on construction sites projects and provide guidance to the sector.
<b>PA8.6</b>	Based on internal review the following changes are noted: Allocate available resources, and identify any additional resources required, to consistently monitor construction and demolition sites projects to assess compliance with the project Resource & Waste Management Plan and apply appropriate enforcement measures to ensure compliance.

**3.5.3.9 FA9 Textiles**

A number of issues were raised by the general public in relation to textiles including the urgent need to address consumption and 'fast fashion', support for charity shops and the voluntary sector, the availability of clothes banks, microplastics in textiles and the development of a central textile recycling facility. These issues are largely addressed in EU policy direction and supported by the policy positions presented in the Plan and no revisions are required.

While the suggestion for a central textile recycling facility is not expressly stated in the Plan, support for such a development (whether private or public) is supported through TP13.1 on recycling infrastructure in general.

Several external organisation submissions cited the EPA funded research into textiles (Nature and Extent of Post Consumer Textiles) as a key factor for consideration and this research has informed the development of the policies and actions in the Plan. One of the first recommendations in this EPA research report is that 'There is a pressing need to obtain better data on the flows and fate of post-consumer textiles' and action PA9.2 seeks to address this recommendation and gather more detailed information to inform future policy development.

VOICE noted that targets on collection rates should be set such as a minimum of 50% capture of used textile by 2026; and 65% by 2029. A mandatory separate collection stream should be available in each county by 2025. The suggested targets are noted but until further information is available on barriers and opportunities for textile collection, such measures are not proposed at this phase of the Plan development.

Other submissions were generally positive on this relatively new area with the only suggested amendment from the EPA who pointed out that DECC should be included as responsible for the suite of actions in this focus area as chair of the Textiles Working Group.

Policy/Action	Revisions in final Plan
	None of the submissions received result in a need to specifically revise the wording of any of the Targeted Policies and Priority Actions for this focus area.

**3.5.3.10 FA10 Hazardous Waste**

There were limited submissions on this focus area from the general public but comments included the need for a hazardous waste collection (including medicines and medical waste) for every county, the banning of disposable vapes and the need to address lithium-ion batteries in the Plan. These issues are addressed through EU or national policy (including the National Hazardous Waste Management Plan) and therefore supported in the Plan. The specific reference to lithium-ion batteries is important and action PA10.1 will be revised to specifically include this material.

External organisation comments were limited and positive where received and the EPA made a number of operational comments on the implementation of the National Hazardous Waste Management Plan and the role of the LGS.

Policy/Action	Revisions in final Plan
<b>PA10.1</b>	Revision of the policy required as follows: Conduct awareness raising campaigns to highlight best-practices and alternatives, with initial focus on paints, cleaning products, lithium-ion batteries and gardening chemicals.

**3.5.3.11 FA11 Infrastructure Regulatory**

There were limited comments from the general public on the regulation of infrastructure but issues raised included the need for a ban on the export of all waste which is not possible, better regulation as well as greater education and awareness of waste facilities and operations. These issues are addressed in the policies and actions for this focus area in the Plan.

Other comments note the need for additional treatment capacity and that additional capacity needs to be supported in the Plan. The need capacity is highlighted in one submission which notes the EU comment that Ireland is at risk of missing the MSW recycling rate targets and recommends 'Further develop waste treatment infrastructure, including increasing bio-waste treatment capacity and supporting home composting'. These are valid comments and additional capacity is supported in the Plan. In general, external organisation responses to the policies and actions in this focus area are positive and supportive in helping to improve information on capacity and consent processes and no revisions are required in the final Plan.

A number of comments were received in relation to policy TP11.1 relating to the application of the Siting Guidance for Waste Facilities, Volume IV Appendix 9. While the Guidance was generally welcomed, a number of submissions (including IWMA and CEWEP) highlighted concerns about the prescriptive nature of the Guidance with reference to setback distances and suitable land locations.

However, this Guidance includes a measure of interpretative flexibility which is clearly stated in the following extract from the introduction to the Guidance (emphasis added):  
This document includes setback distances to neighbours (i.e., residential properties and businesses) and national roads, which are intended to guide the siting of activities. They balance economic and development considerations alongside planning, environmental and community concerns. There is scope to reduce the guidance distances through appropriate planning conditions and mitigation measures. For example, access distances can be extended – provided a project developer can demonstrate that the quality of roads accessing the planned location is suitable and potential impacts on the local community will be kept to a minimum.

The concerns suggest that this flexibility needs to be further highlighted within the Plan and/or Guidance to ensure that both developers and regulators are suitably informed on the detail and flexibility of the Guidance. This note on flexibility will be added to Section 2.3 of Volume I where the Guidance is first introduced in the Plan and will also be highlighted and emphasised more directly in Section 1.2 of the Guidance document. No revision to the wording of TP11.1 in the Plan is required.

Internal LGS commentary highlighted the need for PA 11.1 to be broadened to include the wider policy framework.

Policy/Action	Revisions in final Plan
<b>PA11.1</b>	Based on the internal LGS comments, this action is reworded as follows: Ensure infrastructural developments are in compliance with the waste hierarchy, and siting guidance and the wider policy framework of this Plan through engagement with An Bord Pleanála, and Planning Authorities and other relevant bodies.



### 3.5.3.12 FA12 Reuse/Repair Infrastructure

Submissions from the general public included a range of comments on reuse/repair infrastructure including the need for:

- Public and school visits to repair/reuse infrastructure facilities;
- The incorporation of repair into school curriculums with workshops and classes;
- Craft centres in the community;
- Reuse and repair of textiles and WEEE;
- Initiatives and incentives for reuse;
- Refill practice in retail; and
- A 'right to repair' law.

These comments are either directly addressed or supported within the policies and actions for this focus area or within the Plan (for example, the 'right to repair' is addressed under Focus Area 3).

The policies and actions for this focus area were generally welcomed with positive submissions from external organisations respondents. The EPA noted the need for the National Reuse and Repair Partnership to be referenced under this focus area and this will be included in TP12.1.

CIWM Ireland suggested that there is no policy or action that expressly states support for investment in infrastructure, operations and reporting for the reuse/repair sector which is valid and a revised policy or action wording is provided to resolve this gap in TP12.3.

CIWM Ireland also suggested that TP12.4 be broadened to include secondary product markets as well as secondary materials markets to make it more inclusive and this will also be actioned. The EPA also state that it may be better to consider PA12.5 as two separate actions:

- One on the most appropriate consenting regime for reuse and repair infrastructure (for example an initial action may be timely to review the class of activities under the waste management facility and permit regs to assess whether different activities need to be included especially in the reuse and repair space); and
- A separate action on the collection of reuse and repair data should be investigated.

This comment is valid and is included in the recommended changes for this focus area.

Policy/Action	Revisions in final Plan
<b>TP12.1</b>	Revision of TP12.1 required as follows: 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 <b>through the National Reuse and Repair Partnership.</b>
<b>TP12.3</b>	It is proposed to revise this policy as per the CIWM Ireland comments as follows: Support the development of viable <b>reuse/repair infrastructure and initiatives including</b> materials recovery or other advanced pre-treatment infrastructure that increases the circular potential of materials.
<b>TP12.4</b>	Based on the feedback from CIWM Ireland it is recommended to revise the wording as follows: Encourage the development of circular activities which stimulate and support viable secondary material markets and <b>secondary product markets</b> in the construction, industrial and bioeconomy sectors.
<b>PA12.5</b>	Based on the feedback from the EPA it is recommended to revise the wording as follows: Investigate the appropriate authorisation regime for reuse and repair activities <b>to facilitate the capture of reuse and repair data.</b>
<b>PA12.6</b>	The EPA recommended that PA12.6 is introduced as follows: <b>Collaborate with the EPA through the National Reuse and Repair Partnership to facilitate the capture of reuse and repair data.</b>

### 3.5.3.13 FA13 Recycling Infrastructure

Submissions from the general public expressed the need for:

- More education on recycling including more communication between recycling facilities;
- Consistency on recycling bins nationally;
- More indigenous treatment and less export of recyclable materials; and
- Incentives for greater recycling in commercial/household settings and greater enforcement.

These submissions include wide ranging themes across behaviour change, capacity and regulation and each of these issues is addressed in the Plan and therefore no revisions to the policies and actions are required.

External organisation submissions follow similar themes on behaviour change, capacity and regulation but more targeted submissions on policies and actions are generally supportive of the policy positions presented or provide additional information with no policy or action revisions required.

Policy/Action	Revisions in final Plan
	None of the submissions received result in a need to specifically revise the wording of any of the Targeted Policies and Priority Actions for this focus area.

### 3.5.3.14 FA14 Recovery Infrastructure

Like other infrastructure focus areas, the general public submissions included the need for more education on waste to energy plants. Other comments included the need for a recovery levy (already mandated) and the need for this Plan to ensure that waste to energy should not be prioritised over higher tier options such as reuse, recycling. These comments reflect the policy position in the Plan and no revisions are required.

One submission suggested that the Plan should allow small communities to incinerate waste for heat/energy but this is subject to regulation and planning and the Plan is restricted to supporting additional thermal capacity in general. Similarly, one submission suggested the need for the Plan to ensure diversion of all waste from landfill to waste to energy but this is not possible given the available thermal treatment capacity.

Submissions from external organisations were generally supportive of the policies and actions in the Plan. The EPA suggested an amendment to PA14.2 to provide some clarity on the scope and meaning of the action and this has been addressed.

A number of submissions made observations on the 200,000-300,000 tonnes range specified TP14.2 for additional thermal treatment capacity. Some cite this range as too prescriptive and may act as a barrier to development. However, this range has been devised to help resolve the current capacity shortfall within the State (as calculated for this Plan) but without acting as a barrier to waste prevention and/or the development of higher tier treatment options such as reuse, repair and recycling. It is not proposed to alter the range specified.

Several submissions identified a potential gap in the policy base for this focus area in relation to integration with the bioeconomy and the National Bioeconomy Action Plan 2023-2025. These comments are valid and a new policy has been added to this focus area to resolve this gap.

Policy/Action	Revisions in final Plan
<b>PA14.2</b>	The EPA note that this action needs clarity and a suggested rewording is presented. PA Revised as follows: Set a circularity <b>criteria goal</b> for the output from biological treatment facilities and for soil and other construction and demolition waste streams.
<b>TP14.6</b>	The new TP14.6 is added to resolve the bioeconomy gap as follows: <b>Support the development of circular bioeconomy infrastructure and initiatives that align with the policies of this Plan and the National Bioeconomy Action Plan 2023-2025.</b>

**3.5.3.15 FA15 Disposal Infrastructure**

Several submissions from the general public highlighted the need for financial implications for the creation of products that are likely to end in disposal to landfill (i.e. products that cannot be recycled). One submission proposed that landfill charges should be paid for at the point of sale and no waste charges to consumer should apply (other than collection). Such an approach would require central government intervention and regulation and is outside the scope of this Plan.

Submissions on this focus area from external organisations were generally supportive. In relation to the national waste contingency facility (TP15.2), the EPA suggested that provision should be made for this facility to also accept hazardous waste for disposal and to accept storage of non-hazardous wastes prior to recovery. This proposal for a national waste contingency facility has been subjected to a separate assessment which included the evaluation of at-risk material streams that may trigger a contingency event and included the storage/recovery/disposal of a range of non-hazardous wastes. However, there was no contingency need identified for hazardous wastes to be included and this has not been considered further in the ongoing feasibility analysis.

Similarly, CEWEP and CIWN Ireland suggest that contingency facilities could be better delivered by the private sector rather than the public sector; however, this option is not currently included in the evaluation of options for the provision of contingency capacity as the evaluation relates to the provision of facilities by the public sector.

The current wording of TP15.2 does not preclude the disposal of hazardous wastes or the participation of the private sector and these can be considered, as appropriate, in the future under this policy; however, there is no change proposed to TP15.2.

Internal engagement within the LGS has resulted in a revision to action PA15.4 to provide greater clarity on the purpose of this action in collaborating with landfill operators in the private sector.

Policy/Action	Revisions in final Plan
<b>PA15.4</b>	Based on internal RWMPO discussions the following revision is recommended: <del>Work</del> <b>Collaborate</b> with the landfill operators to ensure that remaining void space is utilised primarily for <b>residual municipal waste has priority to the available licensed landfill void capacity over and above other waste streams.</b>

There were limited submissions on this focus area but comments from the general public include the need for:

- A domestic disposal option for chemical products (e.g. paints);
- Testing of per- and poly-fluoroalkylated substances at hazardous waste facilities; and
- Increased charges on comingled wastes.

The comments raised on this focus area are valid and will be used to inform the completion of the final Plan but there are no changes proposed for the targeted policies and priority actions presented for this focus area.

The EPA referenced the National Hazardous Waste Management Plan and the EPA's role in leading on this focus area. This comment does not warrant any change in the Plan policies and actions.

Policy/Action	Revisions in final Plan
	None of the submissions received result in a need to specifically revise the wording of any of the Targeted Policies and Priority Actions for this focus area.

**3.6 SUBMISSIONS ON VOLUME III DELIVERY ROADMAP**

**3.6.1 Part A: Regulatory, Infrastructure and Climate Impact**

There are limited submissions on Part A from the general public and external organisations, other than the EPA who made limited comments on the assignment of responsibilities or the update of factual information.

In Chapter 1, the EPA recommend the following edit to the narrative text for Table 1.1 to link the Food Waste Prevention Roadmap to the national policy statement, the Waste Action Plan for a Circular Economy:

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 and a Waste Action Plan for a Circular Economy. 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.

This suggested insertion is agreed and will be actioned in the final Plan to give context to the impact of these interventions.

Similarly, in relation to the construction waste projections in Section 1.2, the EPA also recommend that the projection is modified as the national decision for greenfield soil and stone is not anticipated to be available for uptake until Q1 2024. This change will be actioned and will impact on the projected generation levels and temporal effect of this intervention.

**Revisions in final Plan**

- The additional narrative on the interventions in Table 1.1, as suggested by the EPA, will be included in the final Plan; and
- The construction waste projections in Section 1.2 will be updated to reflect the implementation date for the national decision for greenfield soil and stone as noted by the EPA.

**3.6.2 Part B: Organisation, Engagement and Resources**

The general public made no submissions on Volume C Part B. The proposed organisational structures in Part B were supported by the EPA and other external organisations.

The EPA recommended that the organisational arrangements proposed in the Plan recognise existing national governance structures for enforcement activities to ensure current arrangements are preserved and maintained. The EPA also called for a partnership agreement to be established between the EPA and the LGS to provide clarity to roles in respect of circular economy activities and to define an effective way of working together. The EPA recommended that the Plan references the statutory role of the EPA in relation to waste prevention. The EPA will work collaboratively with local authorities to deliver the waste prevention activities in the Plan, to ensure that these activities are impactful, coordinated and focused on priority areas and materials. Each of these comments is welcomed and supportive of the Plan but no revisions to the text of Chapter 4 are required.

The Competition and Consumer Protection Commission (CCPC) welcomed the proposed establishment of the National Coordinating Group for Waste and the Circular Economy (NCGWCE), as it is anticipated to lead to greater coordination between the three main structures responsible for waste management policy DECC, EPA and LGS. CCPC further welcomed the establishment of the Local Authority Waste Programme Coordinating Group (LAWPCG) which will play key policy roles for the LGS. Some commentary was provided by the CCPC on the roles of these new coordinating groups.

**Revisions in final Plan**

While no submissions were raised requiring significant revisions of Part B of Volume III, this aspect of the Plan will be revised as required to account for changes made elsewhere in the Plan on foot of the consultation responses.



### 3.6.3 Part C: Implementation, Monitoring and Oversight

There were limited submissions of detail on this part of the Plan with only minor comments on text and assignment of responsibility for Key Deliverables.

#### Revisions in final Plan

While no submissions were raised requiring significant revisions of Part C of Volume III, this aspect of the Plan will be revised as required to account for changes made elsewhere in the Plan on foot of the consultation responses.

## 3.7 SUBMISSIONS ON VOLUME IV SUPPORTING DOCUMENTATION

As noted previously, the IWMA and CEWEP noted a range of concerns in relation to the Siting Guidance included in Appendix 9 and the prescriptive nature of the guidance. As per the previous recommendation in Section 3.5.3.11, the text in the Guidance will be emphasised that highlights the inherent flexibility.

Other appendices will be updated based on the revisions to Volumes I to III to account for changes in the policies and actions, the Key Deliverables and the SEA/AA processes.

#### Revisions in final Plan

- Revision to the capacities listed in Appendix 7 to account for comments raised or any new consents granted by the EPA;
- Update of Appendix 5 List of Waste Legislation to account for any new regulations;
- Revision of Appendix 9 Siting Guidance for Waste Facilities to highlight the flexibility in this Guidance;
- Update of Appendix 10 Index of Waste Plan Policies to account for the recommended changes in Volume II;
- Appendix 11 Index of Key Deliverables to account for the recommended changes in Volume III; and
- Appendix 12 SEA and AA Mitigation Measures to account for any changes imposed after the revisions to the SEA and AA analysis on the recommended policy/action changes in Volume II; and
- A new Appendix 13 to be inserted to include this report.

## 3.8 SUBMISSIONS ON VOLUME V PART A SEA ENVIRONMENTAL REPORT

The EPA provided a statutory response to the SEA which included a number of recommendations including that the Plan should integrate and implement the recommendations and mitigation measures identified in the SEA in the Plan. This will be undertaken as all SEA (and AA mitigation) are included in Appendix 12 of Volume IV of the draft Plan and this appendix will be retained and updated in the final Plan.

The EPA have stated it would be useful to make reference to the SEA scoping workshop which took place in December 2021 and how the statutory consultee scoping responses were incorporated into the SEA/the Plan. Both of these elements will be included in the SEA Statement to be prepared with the final Plan.

Regarding the review of relevant plans and programmes, the EPA have asked for a schematic showing the Plan hierarchy for waste related plans and the inclusion of the Fit for 55 package. This will be included in the SEA Statement for completeness.

The EPA stated that the SEA should provide clarity regarding the level of transboundary consultation that has been undertaken. Informal transboundary consultation has also been undertaken with consultees where Irish waste is exported including jurisdictions within the UK as well as in other Member States. This feedback will be documented in the SEA Statement.

The EPA recommended that within Chapter 6, the objectives could be made more robust by reference to legal standards and targets, which are included in the proposed SEA monitoring programme. These objectives will be revised, as appropriate, to include such references in the SEA Statement.

The EPA have recommended a 'business as usual' scenario, from the inclusion of information on why/how the Plan targets were chosen e.g. 0% waste growth, 1% MSW per person per year, etc. This update to the analysis of alternatives will be documented within the SEA Statement.

The EPA have requested that the Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should these arise during implementation. The monitoring programme will

## 3.9 SUBMISSIONS ON VOLUME V PART B NATURA IMPACT STATEMENT

The Natural Environment Division (NED) of DAERA advised that all designated sites within the zone of influence whether within the Republic of Ireland or Northern Ireland should be assessed and protected equally. It is noted that the European Sites in Northern Ireland have been included in the Natura Impact Statement of the draft Plan and will continue to be referenced and assessed in the Natura Impact Statement of the final Plan.

#### Revisions in final Plan

The Natura Impact Statement (NIS) will now be updated to account for the following:

- To account for any changes to the policies and actions to be adopted in the final Plan; and
- To ensure consistency with the SEA process.

On completion of the NIS for the final Plan, the competent authority (the RWMPO) will be able to make a formal determination that the adoption of the Plan, alone or in combination with other relevant plans and programmes, will not adversely affect the integrity of any European Site.

be revised to reflect changes to the Plan post consultation and the comments from the EPA. The Natural Environment Division (NED) of Department of Agriculture, Environment and Rural Affairs (DAERA) of Northern Ireland advised that the SEA considers mobile and migratory species which form part of Northern Irish populations and requested that the relevant Northern Irish legislation, programs and policies should be included in Section 4 of the SEA (and Appendix A). Both of these elements will be included in the SEA Statement to resolve these information gaps.

The NED and the Department for Communities – Historic Environment Division (HED) of Northern Ireland noted that within Section 5.1 of the SEA, there is a potential for environmental impacts in Northern Ireland and a section should be added regarding both the baseline and the potential impacts to Northern Ireland. The analysis of impacts in Table 5.1 is broad and is presented at the EU level and includes for potential adverse impacts to Northern Ireland as well as other transboundary impacts. To account for the baseline in Northern Ireland, the Northern Ireland Environmental Statistics Report 2023 will be summarised and referenced within the SEA Statement.

The NED recommended that the 14 objectives from Table 6.1 correspond to which monitoring objectives in Table 9.3 which should employ clear measurable figures and thresholds to provide clear goals. The monitoring programme will be updated as required in the SEA Statement but it is not standard practice to align SEA objectives and monitoring objectives as the monitoring objectives need to be data driven while the SEA objectives do not and the approach adopted in the draft Plan will be retained.

#### Revision in final Plan

Based on the comments received from these statutory consultees, the next phase of the Strategic Environmental Assessment (SEA) will commence in the form of preparation of the SEA Statement which will provide information on the decision-making process and documents how environmental considerations, the views of consultees, the recommendations of the SEA Environmental Report and the assessment carried out under Article 6 of the Habitats Directive have influenced the final Plan to be adopted.

The SEA Statement will replace the SEA Environmental Report as Volume V Part A of the final Plan.



# APPENDIX A

## Consultation Response Database

Volume I Part A: The Rules		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	There have been no submissions from the general public on Volume I Part A.	There were no submissions from the general public received in relation to Part A of Volume I but this is unsurprising given the factual nature of the contents on policy, regulation and the national setting.
Comments from the Local Government Sector (LGS)	There have been no submissions from the Local Government Sector on Volume I Part A.	No updates required.
Comments from External Organisations	<p>The <b>Environmental Protection Agency (EPA)</b> recommend a number of changes in relation to By-Products and End-of-Waste through Volume I (and throughout the Plan) as follows:</p> <ul style="list-style-type: none"> <li>The EPA recommends that all references to Article 27 are changed to Regulation 27 (by-products) and references to Article 28 are changed to Regulation 28 (End-of-Waste).</li> <li>The EPA recommends that all reference to road plannings is changed to site-won asphalt (road plannings).</li> <li>Site-won asphalt (road planning) by-product decision is now further progressed with a draft published in February 2023 and notified to the EU in June 2023: <a href="https://www.epa.ie/our-services/licensing/waste/by-products-regulation-27">https://www.epa.ie/our-services/licensing/waste/by-products-regulation-27</a> / The criteria are expected to be available for uptake in 2023. Greenfield soil and stone criteria currently being drafted for public consultation.</li> </ul> <p><b>WEEE Ireland</b> made the following suggestion:</p> <ul style="list-style-type: none"> <li>Chapter 1 Regulatory Environment: This section should also include reference to the released set of relevant initiatives proposed by the EU Commission such as the proposal for a Regulation on Eco-design for Sustainable Products (ESPR), as well as the proposal concerning batteries and waste batteries (Batteries Regulation), and the proposal for a Directive on common rules promoting the repair of goods.</li> </ul>	<ul style="list-style-type: none"> <li>All references to Article 27 will be changed to Regulation 27 (by-products) and all references to Article 28 will be changed to Regulation 28 (End-of-Waste) in Part A and throughout the Plan.</li> <li>The European Policy direction documented in Section 1.2 of Part A will be revised to include any updated policy or legislative framework for the Plan since the consultation launch in May 2023 including those policy instruments noted by WEEE Ireland.</li> </ul>

Volume I Part B: The Landscape		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	There have been no submissions from the general public on Volume I Part B.	Similar to Part A, given the factual nature of Part B there were no submissions from the general public received in relation to this part of the Plan.
Comments from the Local Government Sector	Internal comments from the Local Government Sector related to data corrections or factual errors.	As noted, all data corrections will be actioned.
Comments from External Organisations	<p>The <b>Irish Waste Management Association (IWMA)</b> noted the following:</p> <ul style="list-style-type: none"> <li>Vol. I. Section 5.4.1.1 Composting, Anaerobic Digestion and Bio-stabilisation The IWMA stated that there is a flaw in the conclusion of the final paragraph of this section. The 50% SDG target is not to reduce source segregated organics, it is to reduce food waste at different stages of production, retail, and consumption. A similar point is noted below by Stream Bioenergy and Cré.</li> <li>Vol. I. Section 5.8 Contingency Capacity for Waste, the IWMA suggest that the best way to provide contingency capacity in Ireland is through existing operational facilities such as the current example at Knockharley and a clear and rational implementation of contingency activation needs to be provided.</li> <li>Vol. I. Section 5.9 Nationally Important Infrastructure, the IWMA welcomes the concept of nationally important infrastructure, but consider some of the thresholds to be too high. For example, IWMA contend that the threshold for recycling infrastructure, including AD, composting and metal recycling should be set at 40,000 tonnes per annum.</li> </ul> <p>In addition, the IWMA has supplied independent analysis of waste capacity within the market, and this will be used to validate the capacity information provided in Volume I of the final Plan.</p> <p>The <b>Confederation of European Waste-to-Energy Plants (CEWEP)</b> made a number of comments on data corrections in Part B of Volume I.</p>	<ul style="list-style-type: none"> <li>The analysis of biological treatment capacity noted by a number of consultees will be revised in Section 5.4.1.1 to better reflect the current capacities and inform the changes and the conclusion will be updated. Any changes to the policies and actions in Volume II will also be revised.</li> <li>The analysis of thermal treatment capacity in Section 5.4.2 will include a note in the projected increase in capacity available in the cement plants by 2030.</li> <li>The suggestion that Contingency Capacity could be delivered by the private sector will be acknowledged in the text in Section 5.8.</li> <li>Table 5.15 of Section 5.9 defining the criteria for Nationally Important Infrastructure will be removed and included in Volume II.</li> <li>The comments on thresholds under Nationally Important Infrastructure are addressed elsewhere and more directly under Core Policy 12 and any updates will be reflected in Section 5.9.</li> </ul>

Volume I Part B: The Landscape		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<p><b>WEEE Ireland</b> made the following suggestion:</p> <ul style="list-style-type: none"> <li>Material Streams: Further details were provided in relation to WEEE collection systems, enforcement opportunities and supporting studies that may add value to the text noted in the draft Plan on WEEE and batteries.</li> </ul> <p><b>The Rediscovery Centre</b> stated that it is important that the role of the Rediscovery Centre is recognised in Irelands transition to the Circular Economy and should be noted Section 4.1 of Volume I of the Plan.</p> <p><b>Cement Manufacturers Ireland (CMI)</b> provide a rationale and the 63% operational capacity for co-processing of wastes at cement plants and how operational capacity may increase in the future to increase the actual volumes of wastes processed relative to the authorised capacity. By 2030, CMI estimate that four cement kilns in Ireland will be using 400,000 tonnes of SRF annually.</p> <p><b>Stream Bioenergy</b> and <b>Cré</b> have highlighted text in Section 5.4.1.1 of Vol I in relation to biological treatment and suggest that decreasing biological treatment capacity need under this Plan could be used out of context to frustrate planning and development and deployment of treatment capacity for these other organic biowaste categories. Both submissions note the role of biomethane and the government target of 5.7TWh to be achieved by 2030 in the Climate Action Plan 2023 which demonstrates the important role AD will play in Ireland's future energy mix. In short, the submissions contend that the Plan should more readily support AD despite the capacity analysis in Volume I. TP13.4 is a policy that supports maximising the circular potential of existing AD and perhaps this could be reworded to be more inclusive of new infrastructure.</p> <p><b>Cré</b> further contends that the threshold for anaerobic digestion and composting in Table 5.15 should be decreased from the 90,000 tonnes threshold in the draft Plan to 50,000 tonnes (similar point raised by the IWMA above) but no justification for this request is provided.</p>	

Volume I Part C: The Resources		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	There have been no submissions from the public on Volume I Part C.	No updates required.
Comments from the Local Government Sector	There have been no submissions from the Local Government Sector on Volume I Part C.	No updates required.
Comments from External Organisations	There were limited organisational comments on Part C given that this Part largely relates to internal Local Government Sector organisational and resourcing matters.	No updates required.

Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>One consultee noted that the National Waste Management Plan for a Circular Economy to the Sustainable Development Goals (SDGs) should align with the ambitions noted in the Plan.</li> <li>Multiple consultees noted that the overall ambition of the plan is far too modest, specifically in relation to the 0% waste growth.</li> <li>One consultee noted that the Plan focuses strongly on recycling when recycling should be the last option for waste management regarding "Reduce, Re-use, Recycle".</li> <li>A response stated that the section on Reuse is unambitious and unimaginative and continue to state that whilst Reuse/Repair infrastructure is worth developing, consideration of more localised reuse is ignored.</li> </ul>	No updates required.
Comments from the Local Government Sector	<p>The following internal comments from the Local Government Sector were provided:</p> <ul style="list-style-type: none"> <li>The Plan should enhance the existing organisational arrangements between the key partners including the DECC, EPA and the Local Government Sector and this is addressed in Volume III.</li> <li>Art 27 will not be used for recycled aggregates; this will be carried out through the Article 28 – this is in reference to the term secondary aggregates in Chapter 1 which is used to cover both end of waste and by-products and is suitably broad to cover both processes.</li> <li>Clarity was sought by the Local Government Sector regarding who will conduct the mass balance exercise of inputs and outputs at Materials Recovery Facilities (MRFs) for National Target 2: Contamination. This task will fall to the operator and will be collated by the LGS for annual reporting and target tracking.</li> </ul>	<ul style="list-style-type: none"> <li>A note will be added to the text in Chapter 2 to highlight that all targets will be subject to annual review and increased as required to drive the ambition of the Plan. Other general comments have been noted and taken into consideration.</li> </ul>

Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>Ambition</b> The EPA noted that the Plan includes a headline ambition target of 0% total waste growth which is welcomed.</p> <p>CEWEP support the ambition specified in this Plan and that its members are fully committed to contributing to these key targets. CEWEP also emphasised support the goal of achieving 0% waste growth throughout the duration of this plan.</p> <p>The <b>Chartered Institution of Wastes Management (CIWM)</b> applauded the Plan's significant ambition and are pleased to see the emphasis on non-household waste.</p> <p>The <b>Rediscovery Centre</b> stated that to achieve the Plan's ambition, significant investment in prevention and preparation for reuse infrastructure and operations will be required. In addition, the following general recommendations were made relating to Volume II:</p> <ul style="list-style-type: none"> <li>• Develop a more proactive approach for stakeholder engagement and consultation, particularly in relation to the design of targets or approaches to meeting these targets, for the lifetime of the Plan.</li> <li>• Revise the framing and use of language throughout the Plan to better reflect the commitment to circularity.</li> <li>• Include images of prevention measures (e.g., refill, reuse or repair) throughout the Plan documents to provide visual cues that demonstrate the Plan's commitment to circularity.</li> </ul>	<p>The stated ambition of the Plan for 0% total waste growth per person over the Plan period was generally welcomed by organisations (including the EPA) as suitably ambitious and no changes to this ambition are required.</p>

Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>National Targets (General)</b></p> <ul style="list-style-type: none"> <li>• The EPA recommend that the final Plan use the waste datasets published by EPA for which it has statutory reporting responsibilities. Similarly, it is recommended that reporting over the Plan implementation period uses waste data published by the EPA.</li> <li>• The EPA recommends that consumption targets in the Plan are extended to focus on measuring total waste for key waste streams including municipal and construction (which have been included in the draft Plan) as well as packaging and WEEE. The EPA note additional information sources that may be used to develop such targets.</li> </ul>	<p>The use of EPA datasets in updating the final Plan will be actioned, however, the use of this data to measure compliance with the proposed national targets is not feasible. A decision was made in drafting the Plan to employ NWCPO data for the national targets as this information is more readily and speedily available to the LGS to allow for more dynamic monitoring and early action. While the EPA validated data is highly valuable, the ongoing delay in publishing this data is a barrier to early action. In the event that a more dynamic reporting regime is developed, the use of this dataset to report on national targets can be implemented. No change to the proposed approach to tracking targets in the draft Plan.</p>
	<p><b>National Target 1A</b></p> <ul style="list-style-type: none"> <li>• Informal feedback from the Local Government Sector suggested that this target may be modified to a Total Target over the Plan period rather than an Annual Target presented in the draft Plan. This change may be easily accommodated and will be assessed further in development of the final Plan and will not alter the ambition but the metric for assessment.</li> <li>• CEWEP support the target to annually decrease residual MSW by 1% per individual.</li> <li>• CIWM suggests the target is revised upward throughout the life of the Plan reflecting the positive effect of media campaigns, roll out of the Brown Bin to all households, commercial waste segregation and improved enforcement.</li> <li>• The Rediscovery Centre stated that the rMSW reduction target should be revisited regularly with a view to increasing ambition more in line with the joint paper recommendations.</li> </ul>	<p>National Target 1A: Residual Municipal Waste: This annual target will be revised to a target over the Plan period as follows: <del>1% Reduction in rMSW per person per year</del> <b>6% Reduction in rMSW per person by 2030</b></p>



Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>National Target 1B</b></p> <ul style="list-style-type: none"> <li>CEWEP support the target concerning construction materials as outlined in this section ('...a 2% reduction per annum is proposed for total construction and demolition waste') and the future use of secondary materials. Incinerator bottom ash produced by the sector can be used as an aggregate and also contribute to this secondary material market in line with the circular economy.</li> <li>CIWM welcomes this target as a starting position and suggests that the Planning and Development Bill 2022 should be amended to allow for the insertion of such stipulations in planning consents.</li> <li>Integrated Materials Solutions (IMS) welcomed National Target 1B and inclusion of a national target for an annual 2% reduction per annum in the generation of construction waste and there is an urgent need for the State to transition away from primary aggregates and to embed the use of secondary aggregates (and other construction materials) in the procurement practices of the public and private sector. This target will aid in tracking that transition and any policy base or infrastructure that supports the achievement of the target."</li> </ul>	As with rMSW, this target is changed to an aggregate target of 12% over the lifetime of the Plan.
	<p><b>National Target 2</b></p> <p>CIWM note that this is an achievable but tough target as it will need an understanding of where contamination arises within the streams indicated, along with a proactive approach for engagement with all sectors.</p> <p>Cré strongly urge a rethink of the 10% limit for contamination in biowaste and recommend the following:</p> <ul style="list-style-type: none"> <li>From 2024 a maximum, by weight, of 5% total contamination of which 3% is plastics in waste collection permits and waste processing licenses;</li> <li>From 2026 a maximum, by weight of 3% total contamination of which 1% is plastics in waste collection permits and waste processing licenses;</li> <li>From 2024, the terms and conditions provided to household and commercial customers be updated to reflect the contamination limits;</li> <li>From 2024, waste collectors to provide anonymous data to the NWPCO on the number of refused bin lifts, warning letters, etc.; and</li> <li>The development of a national waste acceptance protocols and monitoring for biowaste collections and treatment.</li> </ul>	<p>National Target 2: <b>Material Compliance:</b></p> <p>In September 2023, the EPA published the results of the latest waste characterisation studies of household and commercial bins and these new results prompt a revision of National Target 2 with a set of specific targets applied for individual bins. This target will be modified in the final Plan into two separate, but parallel targets as follows:</p> <ul style="list-style-type: none"> <li>• <b>Target 2A: 90% Material Compliance through Segregation in the Dry Recycling Bin; and</b></li> <li>• <b>Target 2B: 90% Material Compliance through Segregation in the Residual Bin by 2030 through annual 10% increases in material compliance.</b></li> </ul>

Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>National Target 3A</b></p> <ul style="list-style-type: none"> <li>The EPA welcomes the identification of Target 3A including an initial per capita reuse target. Revision of Target 3A is recommended and a suitably ambitious reuse target set given the likelihood that the State is already meeting the proposed 10kg target – note that data published by the EPA in July 2023 established a baseline of 10.6kg/person/annum. Using this revised dataset, it is recommended to revise Target 3A accordingly.</li> <li>CIWM note that a common understanding of what is to be measured under this target ambition, and establishing a baseline for benchmarking needs to be an immediate priority. This baseline should incorporate a wide range of sectors and materials, integrated into a wider national circularity metric programme including Repair, Refurbishment and other R-strategy activities.</li> <li>The Rediscovery Centre stated that all 28 product categories and EEE products should be included in the scope of the reuse target. A whole of government approach should also be coordinated to approach and identify funding sources to meet the target.</li> <li>VOICE notes that in June of 2023 the Commission issued an early warning report for Ireland stating that Ireland is considered at risk of missing the 2025 target of 55% for preparing for reuse and the recycling of its municipal waste set out in Directive 1994/62/EC.</li> </ul>	<p>National Target 3A: Reuse:</p> <p>Since publication of the draft Plan, the EPA has published the first set of national reuse statistics for Ireland as required under the revised Waste Framework Directive and Commission Implementing Decision (EU) 2021/19. As a result of this revised baseline, the following changes are recommended for this target and baseline:</p> <ul style="list-style-type: none"> <li>• Target: <del>10</del> <b>20kg</b> per person per year</li> <li>• Baseline <del>6.62</del> <b>10.6kg</b> per person (2020/2021)</li> </ul>

Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>National Target 3B</b></p> <ul style="list-style-type: none"> <li>The EPA suggested an increased level of ambition is required, increasing from 10 locations (spread regionally) to also address with the population needs. It is recommended that the Roadmap for Reuse also includes activities to achieve Target 3B and details how product types will be identified and included as part of future reporting. The cost for implementation of this target at a minimum of 10 CAS is estimated at €15 million in Volume III. In the event that additional national funding is available then the ambition of this target may be increased but the target presented reflects the considered balance between ambition and finance.</li> <li>CIWM note that over 20 CAS currently support reuse activities including paint and bicycle reuse, so the level of ambition stated here is below existing numbers. However, if reuse activities could be expanded to a broader scope of products through at least 10 sites, it would enhance the facilities for the public and contribute to growing reuse.</li> <li>The Rediscovery Centre stated that awareness signage should be introduced at Civic Amenity Sites (CAS) to identify local refuse and repair opportunities, and onsite reuse and repair facilities should be explored as part of the expansion into reuse at CAS. Reuse CAS services should be geographically spread to ensure all members of the public have access, and existing reuse activities at CAS should be built on (including a wider scope of categories).</li> <li>VOICE notes that as this Plan takes the State right up to 2030, this target should be more ambitious. This approach has proven to be effective where it has been trialled across Europe (for example France, Estonia and Poland) and lessons and best practice can be drawn from these trials to ensure an effective implementation of the concept.</li> </ul>	No change to this target.

Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>National Target 4A</b></p> <ul style="list-style-type: none"> <li>CIWM notes that repair targets and measures to develop collection schemes are welcome given the lack of support or measures targeting repair currently.</li> <li>The Rediscovery Centre suggested that the Plan introduce a target for preparation for reuse to boost EEE repair and reuse, through conditions in compliance scheme Ministerial approvals pursuant to Regulation 33 of S.I. 149/2014. A target should also be introduced for repair as a service, and research should be carried out to develop a methodology to measure this.</li> </ul>	No change to this target.
	<p><b>National Target 4B</b></p> <ul style="list-style-type: none"> <li>The Rediscovery Centre requested that the Plan implementation consult with reuse and repair practitioners regarding the design of any collection systems for reuse or repair. Ensure that any non-waste activities remain separate to waste activities when introducing new collection schemes, to avoid the creation of new barriers to reuse. The authorisations, infrastructure, and support for preparation for reuse activities must be reviewed and measures introduced to overcome associated barriers to support repair collections.</li> </ul>	No change to this target but comments have been taken into consideration.

Volume II Part A: Core Positions		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>European Targets</b></p> <ul style="list-style-type: none"> <li>• CEWEP support the Plan target of achieving 50% food waste reduction target by 2030 which is in line with waste prevention objectives.</li> <li>• CEWEP support any additional measures that might be needed to achieve packaging recycling targets, and which will ensure only non-recyclable packaging waste is treated in waste to energy facilities.</li> <li>• CEWEP supports the Plan target of no more than 10% of MSW to landfill by 2035. In order to meet this target, additional waste must be diverted from landfill. It is imperative that the landfill levy exemption for (bio)stabilised waste be removed to ensure waste is diverted from landfill and valuable materials are recovered in line with the waste hierarchy and the circular economy.</li> <li>• CEWEP note that this Plan should also consider how best to manage lithium-ion batteries. For example, disposable vaping devices and other electronic devices containing these batteries present several challenges to our current waste collection and recycling system. These include a risk to the health and safety of waste collection workers and others. When damaged, short-circuited or overheated, these batteries can also catch fire, which has the potential to present a risk to available treatment capacity for residual waste.</li> <li>• The Alliance for Beverage Cartons and the Environment Ireland (ACE Ireland) recommends introducing recycling targets for more specific material types including beverage cartons to improve the quantity and quality of materials recycled, through increased collection and sorting.</li> <li>• AMBER stated that the percentage of waste going to landfill is not a meaningful target as this assumes a national policy based on incineration, but this is a mandatory EU target.</li> </ul>	No changes to European targets which are established in legislation and mandatory.

Volume II Part B: Core Policies		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• A number of consultees agree with CP1, stating the importance of protecting the environment through changes in waste management in Ireland.</li> <li>• Consultees express their desires for updates to policy and legislation in accordance with CP3. For example, one consultee requested a government policy to prevent unnecessary excess packaging entering the consumer chain.</li> <li>• Collaboration has been supported by the public regarding residents' associations and Local Authority.</li> <li>• The public have expressed the need for behaviour change in accordance with CP5 through, awareness campaigns and education.</li> <li>• Consultees noted the need for innovation in the waste sector and how excessive bureaucracy could inhibit innovation such as community level recycling.</li> </ul>	A significant number of responses were received that made reference to the 13 core policies presented in the draft Plan. In general, the public responses largely welcomed CP1 on protecting the environment, CP3 on updating policy and legislation, CP4 on collaboration and CP5 of delivering effective behaviour change. This positive response on the core policies affirms that the breath of policies and the wording of same are largely aligned with public expectation and the need for these overarching values in delivering this Plan.
Comments from the Local Government Sector	The Local Government Sector provided internal comments on Volume II Part B, these are addressed in the Specific Issues on any Core Polices section.	Comments made are noted and taken into consideration.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• <b>Cement Manufacturers Ireland (CMI)</b> contend that it is a mistake to include the 'Note' to specifically 'excludel co-processing at cement plants' from the criteria for Nationally Important Infrastructure in Table 5.15 of Volume I and in Table 3.1 of Volume III, both of which relate to CP12. CMI suggest that the exclusion of cement plants from the definition would prevent future applications by members to increase capacity to accept alternative fuels and raw materials, which will be essential to achieve carbon dioxide emissions reduction and to meet circular economy objectives.</li> <li>• <b>Zero Waste Alliance</b> Ireland state that education and awareness building can contribute to policy support and advocacy for better waste management.</li> </ul>	The organisational responses largely welcomed the core policies but there were a number of suggested edits or revisions to further enhance the scope of these policies.



Volume II Part B: Core Policies		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>The <b>Regional Assemblies</b> noted broad support for the core policies listed in the draft Plan but noted that there was also a need to include for the identification of regionally important infrastructure and capacity enhancements necessary to achieve the NPF objective (potentially to supplement CP12). In addition, the Assemblies recommended that policy is required to address the cross-border dimension of waste generation and its movement between north and south. While Collaboration is broadly addressed in CP2, collaboration with Northern Ireland is not expressly stated within the draft Plan. It is recommended that a set of thresholds for 'Regionally Important Infrastructure' are developed and should include Pre-Treatment Infrastructure, Recycling Infrastructure, Recycling Infrastructure Compositing &amp; Anaerobic Digestion and Soil Recovery facilities.</li> </ul>	
Volume II Part B: Core Policies		
Submissions - Specific Issues - Core Policies		Revisions to Core Policies
CP2	The <b>Rediscovery Centre</b> stated it is necessary to provide greater recognition in CP2 of the wider impacts of the linear economy on climate change and biodiversity loss than those recognised in the Climate Action Plan.	CP2
CP3	<ul style="list-style-type: none"> <li>The <b>EPA</b> recommends implementation of waste collection permit conditions and waste presentation byelaws to support urgent rollout of the 3-bin system (note that this is addressed in PA1.5, PA4.6).</li> <li><b>CIWM Ireland</b> fully supports this core policy as collaboration with all stakeholders is essential and emphasise that the Waste Forum, used to develop this draft Plan and took an all-inclusive approach, should be fostered going forward for the desired outcome.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Core Policy.
CP4	Internal comments from the Local Government Sector stated that the delivery should be the responsibility of the Local Government Sector as opposed to the LAS.	Comments made are noted and taken into consideration but there is no proposed change to this Core Policy.

Volume II Part B: Core Policies		
Submissions - Specific Issues - Core Policies		Revisions to Core Policies
CP5	<ul style="list-style-type: none"> <li>The <b>EPA</b> recommends the Plan includes strong implementation measures by local authorities targeting households (including apartments) and businesses to support delivery of these targets including the delivery of targeted awareness campaigns (PA1.1/PA1.2) and enforcement activities (TP1.4/TP2.4) to address contamination and improve the separation of food waste and recyclables from residual waste.</li> <li>The <b>Rediscovery Centre</b> noted the importance of aligning efforts to coordinate a multiagency National Circular Economy Communications Strategy and awareness campaigns, and any associated working groups, with the feasibility study into establishing a Centre of Excellence for Communications and Public Engagement for the Circular Economy.</li> <li><b>CIWM Ireland</b> fully supports this core policy and stated that there needs to be effort of tackling consumerism and the commercial sectors' role in greenwashing and that businesses have a key role in behaviour change.</li> <li>ACR+ noted in the peer review report that the need to better understand certain behaviours and perceptions of citizens and other waste producers and to address them more effectively in communication or other types of responses may also be through polls, survey, focus groups, or by making field analysis of actual behaviours for the different waste collection processes. This need to evaluate opinions that inform behaviour is important and CP5 has been reworded accordingly.</li> </ul>	Based on the ACR+ comments, this policy is reworded as follows: <b>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.</b>
CP7	<ul style="list-style-type: none"> <li>The EPA recommends that the wording of CP7 should be broadened beyond 'the waste sector' and beyond a focus on the management of non-kerbside wastes, to reflect the need R&amp;I to inform and support the circular economy transition across many sectors.</li> <li>CIWM Ireland fully supports this core policy and state that certain areas require further research, for example, biowaste to land."</li> </ul>	Based on the EPA recommendations, it is proposed to revise CP7 as follows: Encourage and support further research and innovation in the transition to a circular economy. <del>across the waste sector with a particular focus on the management of non-kerbside waste streams.</del>

Volume II Part B: Core Policies		
Submissions - Specific Issues - Core Policies		Revisions to Core Policies
CP8	CIWM Ireland fully supports this core policy to have a new time linked capacity register for LGS to ensure adequate infrastructure is available and a contingency is in place. This is urgently required and a very positive step that CIWM Ireland is willing to assist Government.	Comments made are noted and taken into consideration but there is no proposed change to this Core Policy.
CP9	<b>CIWM Ireland</b> fully supports this core policy and suggests the draft Plan must align with National Strategic Objectives - both economic and environmental.	Comments made are noted and taken into consideration but there is no proposed change to this Core Policy.
CP10	<ul style="list-style-type: none"> <li>The <b>EPA</b> welcome the inclusion of GPP as a policy area which has the opportunity to reduce consumption, prevent waste and improve waste management. Suggest editing the text, as Ireland has not committed to implementing GPP in all tenders by 2023. The Programme for Government: Our Shared Future (2020) states that 'we will mandate the inclusion of green criteria in all procurements using public funds, to be completed within 36 months.' DECC is expected to publish a GPP Strategy and Action Plan for public consultation in Q3 2023 and the final Plan should take into consideration relevant roles &amp; responsibilities when this national policy document is finalised.</li> <li>The <b>Rediscovery Centre</b> noted a minimum target for the procurement of used goods should be introduced to support the 10 kg per person reuse target. The requirement for circular criteria in public procurement must be strengthened, and a greater focus placed on GPP implementation within LA procurement processes to support growth in reuse and repair in line with the Plan targets.</li> <li><b>CIWM Ireland</b> fully supports this core policy and suggests the application of Green Public Procurement (GPP) criteria in all LA contracts must be mandatory and part of KPIs.</li> </ul>	Based on the EPA recommendations, it is proposed to revise CP10 as follows: Reinforce the consistent application of Green Public Procurement criteria in local authority contracts to ensure that public spending is aligned with the policies of this Plan <b>and the Green Public Procurement Strategy and Action Plan.</b>

Volume II Part B: Core Policies		
Submissions - Specific Issues - Core Policies		Revisions to Core Policies
CP11	<p>The <b>EPA</b> welcomes this statement. The local authorities are key stakeholders in the collection and validation of waste data. The EPA is reliant on this data for the completion of statutory reporting deadlines on behalf of the State in particular household and municipal waste datasets. As discussed at recent National Waste Data Network Meetings collating, validating and producing the local authority and litter datasets will transfer from the Agency to the local government sector from 2024 reporting onwards. In line with this core policy the local authorities will be required to deliver this dataset by an agreed date each year so the EPA can publish completed national datasets in a timelier fashion which are critical for assessing the State's progress to targets and draft Plan targets. The EPA will also require the local authority to collect specific data (such as source data) from the largest waste facility operators annually. This information is required each year as part of EPA national reporting of municipal waste. It is recommended KD46 is updated to reflect these additional requirements on local authorities to report data to the EPA.</p> <p>The <b>Rediscovery Centre</b> noted the Plan should ensure timely and quality data is used to inform communications and develop trust with the wider public as part of the aligned, coordinated, and multi-agency approach to communications. In relation to any live reporting system, accessibility and transparency will be essential.</p> <p>The <b>Competition and Consumer Protection Commission (CCPC)</b> recommendation on data quality may be summarised as follows:</p> <ul style="list-style-type: none"> <li>Data collected by the NWCPO should include apartments and households who do not currently have access to a collection service;</li> <li>Data should be collected on a granular (route) level in order to enable an appropriate structure to determine the number of active operators and concentration levels in local areas; and</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Core Policy.

Volume II Part B: Core Policies		
Submissions - Specific Issues - Core Policies		Revisions to Core Policies
CP11	<ul style="list-style-type: none"> <li>Baseline registries should be prepared in relation to various areas within the waste management sector, including household waste collection facilities. Regarding the issues raised by the CCPC on data quality, the draft Plan includes for CP11 and the EPA as lead will deal with all other data issues raised through the National Waste Data Network Group.</li> </ul>	
CP12	<ul style="list-style-type: none"> <li>The IWMA welcomes the concept of nationally important infrastructure but consider some of the thresholds to be too high. IWMA suggest that the threshold for recycling infrastructure, including AD, composting and metal recycling should be set at circa 40,000 tonnes per annum.</li> <li>The Rediscovery Centre commented to align with the core positions of the Plan, the assessment of infrastructure capacity and deficits and analysis of nationally important infrastructure must identify the potential for nationally important prevention (including reuse and repair) capacity. It will be essential to provide financial support for operations in addition to infrastructure investment to drive growth in the reuse and repair sector.</li> <li>CIWM Ireland suggests specifying what defines nationally important infrastructure and providing a mechanism on a case-by-case basis as these decisions require fast tracking in consenting.</li> <li>In relation to CP12 and while thresholds are not stated in the policy, Cré contends that the threshold for anaerobic digestion and composting should be decreased to 50,000 tonnes.</li> <li>Integrated Materials Solutions (IMS) supported CP12 and the establishment of criteria for nationally important infrastructure and the inclusion of a policy that will support such infrastructure in planning and other consent functions.</li> </ul>	<p>Based on the commentary from the Regional Assemblies, CP12 will be updated to include for Regionally Important Infrastructure and supported with the inclusion of the criteria listed in Table 3.1 in the Consultation Report:</p> <p>The Plan recognises and supports the need for nationally <b>and regionally</b> important waste infrastructure, including infrastructure of the type, scale and proximity essential to maintain waste services and infrastructure that contributes to the ambition and policies of the Plan.</p>

Volume II Part B: Core Policies		
Submissions - Specific Issues - Core Policies		Revisions to Core Policies
CP13	<ul style="list-style-type: none"> <li>The EPA's Circular Economy Programme identifies the need for a Circular Economy Network for good alignment between the programme, local authority needs and circular economy strategic priorities. It is recommended that the Plan recognises the value of this network as a vehicle to align circular economy and waste prevention activities. The EPA recognises that funding of local authorities to deliver circular economy projects and demonstration activities of scale and impact is needed. The EPA recommends that the Plan identify the need to review the existing funding model to support such activities to agree the most effective structure over the period of the Plan.</li> <li>The Rediscovery Centre state that an overall vision of how funding can be found and delivered to relevant operations to ensure the targets or policies are met is required and include a series of recommendations on the fiscal and funding measures required a number of which are outside of the control of the Local Government Sector.</li> <li>ACR+ suggested that CP13 on funding the Plan could be enhanced by adding reference to the foreseen taxes and economic instruments that may also contribute to the funding of the Plan.</li> </ul>	<p>Based on the ACR+ comments, this policy is reworded as follows: The Plan seeks to attract funding, <b>including from relevant taxes and economic instruments</b>, and support for initiatives and projects that underpin business continuity, core and targeted policies and priority actions. Any project or initiative arising from the implementation of this Plan will take account of appropriate principles including the polluter pays principle.</p>



Volume II Part C: Focus Areas		
FA1 Municipal Commercial Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>A need for standardising large commercial waste bin colours to minimise potential confusion due to variance in approaches by different waste companies which could boost compliance.</li> <li>The hospitality sector, in particular pubs, restaurants, fast-food chains and hotels, need to encourage best practice waste disposal and provide segregated bins for customers.</li> <li>Cafés should be encouraged to incentivise the use of Keep Cups and return of disposable cups. Used coffee grounds were asserted as a valuable slug repellent for gardeners.</li> <li>Workplaces are described as having inadequate waste segregation and could improve their efforts at instilling positive attitudes to waste management.</li> <li>Pharmacies should accept unused, expired or waste medicines. Guidance on the correct waste stream should be added to labels on medicine.</li> <li>A multi-faceted approach is required to tackling packaging waste requires legislation, waste reduction at source, packaging taxes at point of sale/import and innovating sustainable alternatives to plastic.</li> </ul>	The general comments from the public and external organisations on this focus area included themes such as the primacy of prevention, the need for the hospitality sector, as well as others, to be more proactive in adopting best practice and the need for optimised and enforced collection systems to improve segregation. The comments are aligned with the direction of the policy position on municipal commercial waste and the need for action and, as such, there are no revisions to the policies and actions required based on these comments.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector noted that there is no mention of bag designated areas in Focus Area 1 and believe this should be addressed.</li> <li>Internal comments from the Local Government Sector noted that FA1 should include the development and delivery of commercial waste bye laws across the State - to include incentivised charging in line with the new regulations. This would be a Local Government Sector task. Additional responsibility for this task also includes industry (through their customer charter).</li> </ul>	Following Local Government Sector comments there is a minor revision to TP1.3 to align the text of this policy with the focus area title as below and other comments taken into consideration.

Volume II Part C: Focus Areas		
FA1 Municipal Commercial Waste Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p><b>VOICE</b> largely welcomed the measures under commercial waste but suggested that more emphasis could be put on the inclusion of waste avoidance through reusable packaging, particularly within the b2b area.</p> <p><b>Stoneybatter Sustainability Coalition</b> noted that the targets for municipal solid waste (MSW) recycling were perceived as unambitious with requests for revision to higher targets. There is a perception Ireland has insufficient capacity for MSW.</p> <p>The <b>EPA</b> note that the National Waste Report 2020 calls for key actions to be led and delivered by Local Authorities (LGS) including:</p> <ul style="list-style-type: none"> <li>Targeted and co-ordinated awareness and education campaigns focused on improving the capture of food waste from businesses and households.</li> <li>Targeted enforcement campaigns to lower contamination rates in the recyclable bin.</li> </ul>	Organisational responses included specifics on policies and actions for this focus area but typically these related to the assignment of responsibilities for actions.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector noted that there is no mention of bag designated areas in Focus Area 1 and believe this should be addressed.</li> <li>Internal comments from the Local Government Sector noted that FA1 should include the development and delivery of commercial waste bye laws across the State - to include incentivised charging in line with the new regulations. This would be a Local Government Sector task. Additional responsibility for this task also includes industry (through their customer charter).</li> </ul>	Following Local Government Sector comments there is a minor revision to TP1.3 to align the text of this policy with the focus area title as below and other comments taken into consideration.
FA1 Municipal Commercial Waste Submissions - General Themes		Amendments to the Plan
TP1.3	Following Local Government Sector comments there is a minor revision to TP1.3 to align the text of this policy with the focus area title.	Revise the wording of this policy for consistency with the FA title: Strengthen the monitoring and accurate measurement of <del>non-household</del> <b>commercial</b> municipal waste flows.

Volume II Part C: Focus Areas		
FA1 Submissions Specific Issues - Priority Actions		Amendments to the Plan
PA1.1	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> noted that it is important that any campaigns and projects are coordinated both across agencies and with the wider group of stakeholders, particularly prevention, reuse and repair practitioners involved in this area. Furthermore, behavioural change will rely both on awareness and other measures such as access to systems that facilitate prevention, reuse and repair. This will require a cross agency coordinated approach to sourcing funding and supporting investment.</li> <li>• Internal comments from the Local Government Sector suggested that the responsibility of PA1.1 is to be the Local Government Sector as opposed to the Local Authority Sector (LAS).</li> </ul>	It was recommended to revise the wording of PA1.1 as follows: <b>Collaborate with other agencies</b> to develop and deliver targeted awareness campaigns and projects to improve behaviours on prevention reuse and repair in non-household settings.
PA1.2	<ul style="list-style-type: none"> <li>• Internal comments from the Local Government Sector suggested that the responsibility of PA1.2 is to be the Local Government Sector as opposed to the LAS.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA1.3	<ul style="list-style-type: none"> <li>• Internal comments from the Local Government Sector suggested that the responsibility of PA1.3 is to be the DECC as opposed to the LAS.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA1.4	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> noted that the waste collection companies should also be involved in promotion of best practice to commercial waste producers as these companies deal directly with customers, thus supporting LGS to promote overall best practice to the sector.</li> <li>• Internal comments from the Local Government Sector suggested that the responsibility of PA1.4 is to be the Local Government Sector as opposed to the LAS.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA1.5	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> suggests a standard or guideline on the byelaws for household and non-household would be useful on mywaste.ie. This comment is noted, and the value of this suggestion is agreed and will be implemented but there is no requirement to revise this policy.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA2 Municipal Household Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• The distance between dwellings and recycling centres asserts bulk recycling as a car-oriented exercise. Households (even those with cars) requested development of facilities closer to residential areas.</li> <li>• The cost of domestic recycling with the green bin, brown bin and Civic Amenity Sites (CASs) was reported as excessive. Black bin usage being cheaper disincentivises compliant waste segregation.</li> <li>• Targeted waste collection for seasonal conditions (summer garden waste), rural areas and apartments were major issues raised. A nationalised waste service was suggested with bin size options.</li> <li>• Underground communal bins with receptacle above ground could decrease the number of trips lorries would need to make and save carbon emissions.</li> <li>• Substituting the direct financial burden of waste with a transient tax or pay per weight waste expenses was implied as a solution to illegal dumping.</li> <li>• Fly-tipping may be also reduced by an alternating, tendered public-private partnership. The service compels households to have a contract for waste collection making offenders easier to identify.</li> <li>• Oversight may be enforced with CCTV in blackspots, litter wardens and technology for bins.</li> <li>• Education and advertising campaigns are needed for households that are unsure what is recyclable and compostable. Evidently packaging lacks useful information to guide compliant waste disposal.</li> <li>• Recycling is seen as secondary to waste reduction. Producers and supermarkets could decrease packaging at source with refill options in addition to swapping packaged goods with loose items.</li> </ul>	Comments received from the general public on municipal household waste largely related to the householder cost of waste services, the need for more proximate recycling centres, the difficulty in managing wastes at apartments, the need for education and advertising campaigns and the need for more rigorous enforcement. With the exception of cost, which is outside the remit of this Plan, each of the remaining areas of concern are addressed in the Plan and these comments largely endorse the need for the policy position presented and the actions identified in the draft Plan.

Volume II Part C: Focus Areas		
FA2 Municipal Household Waste Submissions - General Themes		Amendments to the Plan
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>• <b>Galway County Council on behalf of elected members</b> provided further support for a nationalised waste services manifested as a local property tax. This was a direct response to private waste monopolies and price gouging.</li> <li>• <b>Donegal County Council on behalf of elected members</b> expressed concerns with the cost of recycling, specifically to the cost of recycling bulky items through the CAS network.</li> <li>• Internal comments from the Local Government Sector noted that there are no mention of PTUs in the Plan and stated that these should be included in the Plan as an alternative to kerbside collection.</li> <li>• Internal comments from the Local Government Sector states that there should be a standalone Target Policy for apartments. There is a Priority Action but this does not identify the necessary steps involved to tackle multi-unit dwellings.</li> </ul>	The submission received is noted but does not revise the wording of this policy.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• <b>EarthAct</b> recommended education to enable an understanding of waste destinations for household wastes.</li> <li>• <b>Irish Food Packaging Alliance</b> also recommended raising public awareness to dealing with municipal household waste.</li> <li>• The <b>EPA</b> note the National Waste Report 2020 and the key actions to be led and delivered by LGS on household waste.</li> <li>• <b>VOICE</b> calls for the inclusion of an additional focus area on nappies which is currently a subset of FA2. In 2018, nappies comprised 10.1% of kerbside collected household mixed residual waste.</li> </ul>	CIWM Ireland made a number of relevant comments on behaviour change, types of collection bins, brown bill roll out, source segregation in other jurisdictions and clarity on waste costs, all of which are relevant to and support the policies and actions presented in the draft Plan but there are no revisions required in light of these comments. The EPA commented that the EPA's focus on behavioural change campaigns targeting households will link to the role in leading the national waste prevention programme, insights from behavioural insights studies and insights from waste statistics and waste characterisation studies.

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FA2 Municipal Household Waste Submissions - General Themes		Amendments to the Plan
TP2.1	<b>CIWM Ireland</b> noted that much work has already been done to promote waste reduction from households by the STOP Food Waste Programme, it is most likely that further gains will be made here along the supply chain and with food retailers and in the commercial sector.	The submission received is noted but does not revise the wording of this policy.
TP2.2	<b>CIWM Ireland</b> noted that the roll out of Brown Bin to all households should provide for better source segregation and an uplift in biowaste tonnage, along with reduced contamination rates for recycle.	The submission received is noted but does not revise the wording of this policy.
TP2.4	<b>CIWM Ireland</b> noted that waste streams that have been source segregated in other jurisdictions, i.e., WEEE in UK and glass provide good examples of segregation systems that have had positive outcomes for the circular economy.	The submission received is noted but does not revise the wording of this policy.
TP2.5	<b>CIWM Ireland</b> noted that it was clear from the survey carried out as part of the evaluation of the Regional Waste Management Plans that householders were not fully aware of the breakdown of costs for household MSW. CIWM Ireland suggests a template for waste collectors on how to provide information to customers.	The submission received is noted but does not revise the wording of this policy.
FA2 Submissions Specific Issues - Priority Actions		Amendments to the Plan
PA2.1	• The <b>EPA</b> commented that the EPA's focus on behavioural change campaigns and projects targeting households will link to (i) the role in leading the national waste prevention programme (ii) insights from behavioural insights studies (iii) insights from waste statistics and waste characterisation studies. DECC should be included in Communications Campaigns.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA2.2	• <b>CIWM Ireland</b> noted that as the number of items required to be collected at kerbside increases, having a way to identify which containers can take which items are likely to aid effective collection systems. Colour can work to a certain point, depending on whether companies or LGS want to promote their service with corporate colours. Specified colour coding rather than standardised identification.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.



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FA2 Submissions Specific Issues - Priority Actions		Amendments to the Plan
PA2.3	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> is aware that the ChemCar has been successful, in some areas, for hazardous household waste, in others coverage is via local CAS. However, the costs of providing the ChemCar service were beyond the budget ability of many LGS without DECC/DEHLG assistance. Consideration of introducing an EPR for household hazardous materials / chemicals should be revisited now, as previous trial collections by the EPA, LGS and Department of Agriculture were successful in terms of tonnes collected, public participation and value for money. There is a need to get the former working group members for this project back together to drive this project initiative.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA3 Compliance Schemes Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• The predominant theme in this category involved increased role of deposit return schemes. The main focus was towards beverage packaging comprising plastics, glass, aluminium, and coffee cups, use of deposit schemes for collection of vapes was also suggested.</li> <li>• The success of the WEEE compliance scheme was lauded and used as an example for implementation for other industries such as grocery store plastics, toys, medical plastics, and surplus paint.</li> <li>• Food packaging compliance schemes were deemed urgent for fresh produce in supermarkets and cooked meals from fast food businesses.</li> <li>• Suggestions were made for mandating packaging producers to sign up to Repak or otherwise be subject to a packaging tax.</li> <li>• There were also calls for legislation that compels companies to offer customers a 'Right to Repair' goods to extend the lifespan of products. Planned obsolescence was requested to be eradicated.</li> </ul>	The predominant theme raised by the public in this focus area related to the increased role of deposit return schemes (DRS) for highly visible waste streams such as beverage packaging comprising plastics, glass, aluminium, and coffee cups. The DRS and coffee cup levy are on track for national implementation and are supported by this Plan. The public also placed significant emphasis on packaging, in particular in the highly visible retail sector, which is somewhat managed through voluntary engagement in a compliance scheme and supported by this Plan.

Volume II Part C: Focus Areas		
FA3 Compliance Schemes Submissions - General Themes		Amendments to the Plan
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>• Internal comments from the Local Government Sector noted, in regard to the "What is it?" section of the Focus Area, that the EPRs ensure that producers bear the financial and environmental responsibility of a product post-consumer stage.</li> <li>• Internal comments from the Local Government Sector suggested that the following text is added to the "What is it?" section of the Focus Area. "Under the SUP Directive, additional EPRs will be coming on stream including fishing gear for example."</li> </ul>	Comments made are noted and taken into consideration.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• <b>Irish Food Packaging Alliance</b> encourage the greater adoption of eco-design which simplifies the reprocessing of materials once they have been used. They also raise concerns regarding the implications of the plastic Packaging Waste Regulation and the requirement for a minimum use of recycled material.</li> <li>• The <b>Rediscovery Centre</b> note that it will be essential to involve reuse and preparation for reuse practitioners in the design of any EPR schemes, given in particular the experience in this field and the lack of progress to date in expanding reuse or preparation for reuse activity under existing compliance schemes.</li> <li>• <b>WEEE Ireland</b> are leading a Communication Strategy to promote the importance of recycling e-waste for resource recovery and re-use in manufacturing to support a fully sustainable and Circular Economy.</li> <li>• <b>WEEE Ireland</b> propose inclusion of mandatory handover of WEEE to Schemes from all waste sites similar to the handover in place in the current WEEE Regulations from Local Authority sites and Retailer Collection points.</li> <li>• The <b>IWMA</b> cite the emerging issue of critical raw materials as relevant for the WEEE sector. These are recycled mostly at metal/WEEE recycling facilities and IWMA suggest that the Plan should support such recycling and make it easy for the public to recycle those materials. There should be public access to all metal recycling facilities that wish to provide such access and there should be greater awareness raising in relation to WEEE return points.</li> <li>• The <b>Labour Party</b> calls for change in legislation including amendments to the Consumer Rights Act 2022 that compels companies to offer customers a 'Right to Repair' goods to extend the lifespan of products.</li> </ul>	A number of valuable organisational responses were also raised such as the Irish Food Packaging Alliance encouraging the greater adoption of eco-design in packaging (as per TP3.2) and the Rediscovery Centre view that reuse and preparation for reuse practitioners are included in the design of any EPR schemes (supported through TP3.3). Given the organisational comments raised are addressed in the draft Plan for compliance schemes, no significant revisions to the draft Plan policies and actions is required.

Volume II Part C: Focus Areas		
FA3 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP3.1 (and PA3.1)	<ul style="list-style-type: none"> <li>• <b>WEEE Ireland</b> commented that as part of WEEE Ireland Communication Strategy, the Scheme is collaborating with key stakeholders including Electrical Retailers and Wholesalers, LGS, Community Initiatives, Scheme Members, Partners, and Trade Associations, to amplify the importance of recycling e-waste for resource recovery and re-use in manufacturing to support a fully sustainable and Circular Economy. In relation to submissions regarding collaboration on awareness campaigns, it is considered that PA3.1 addresses this through the LGS support to the Compliance Schemes rather than the LGS leading such campaigns. From the responses, it is noted that there is a potential need to include for a specific action on the collection and recycling of designated Critical Raw Materials from WEEE and other materials – potentially this may be a subset of TP3.1 and may be delivered in collaboration with the WEEE compliance schemes.</li> </ul>	The submission received is noted but does not revise the wording of this policy.
TP3.3	<b>WEEE Ireland</b> comment that a standalone scheme for PV panels must be considered due to the fact that this material stream is complicating the achievement of WEEE Targets.	The submission received is noted but does not revise the wording of this policy.
TP3.4 (and PA3.3)	<b>WEEE Ireland</b> comment that no formal Eco-modulation programme has been put in place to date in Ireland on WEEE or Battery Compliance fees. Differential environmental management costs apply to different types of electrical equipment, according to the specific treatment processes required or the potential commodity values contained.	The submission received is noted but does not revise the wording of this policy.

Volume II Part C: Focus Areas		
FA3 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA3.1	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> noted that there is potential for consumer overload if all compliance schemes provide messaging separately, the LGS/DECC are in a unique position to provide a structured targeted awareness campaign for all compliance scheme materials. DECC should have oversight of any awareness campaign for the successful implementation of the WAPCE. National coordination of messages is important as are national campaigns to drive greater awareness in a coherent way and encourage behavioural change across the country. Compliance schemes will still need to promote and engage directly to support their individual programmes, particularly at regional and community level, CIWM Ireland suggests coordinated efforts under the MyWaste.ie banner can be improved upon.</li> <li>• Internal comments from the Local Government Sector suggest that the responsibilities of PA3.1 are EPR/Local Government Sector, as opposed to EPR/LAS.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA3.2	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> noted that access to material from reuse from CAS should be controlled and accounted for such as through a registration system. Criteria for registration could include business plans for reused material, waste authorisations and reporting commitments along with product liabilities and insurance requirements. This is currently the case for access to e-waste for preparation for reuse from CAS or Compliance Scheme collection points – Registration is via the Producer Register Ltd. This registration requires certification to EN50614 WEEE Preparation for Reuse Standard and currently no organisation is certified to this standard in Ireland. The Compliance Schemes will support a standards-based approach for quality and risk management but supports for organisations to achieve certification could be included in this framework development. Under the WAPCE it was noted review of the perceived barriers around reuse such as warranties, insurance and indemnification should be undertaken. Perhaps this can be done with one pilot CAS Reuse development in 2023/2024 with the next 9 following on using learnings and outcomes from the pilot.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA3 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA3.3	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> noted that in principle, EPR schemes have been a successful methodology to encourage producer responsibility, however, the existing EPR Schemes are supported by the EU and National legislating framework for operations. Legislation to provide for EPR for other materials is required.</li> <li>• Internal comments from the Local Government Sector suggest that the responsibilities of PA3.3 is for DECC/Local Government Sector/ Ind.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA3.4	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> partially agrees with this Priority Action. The DECC should also have oversight in this area to ensure compliance schemes operate to EU standards for their given waste stream.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA4 Collection Systems Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• There is a need for waste collection systems to be nationalised, as waste collection currently is expensive and does not incentivise recycling or proper bin use. Waste collection should be free or covered by tax.</li> <li>• The need for contingency capacity bins was highlighted, and overflowing bins should incur a fine - an underground bin system could also be utilised to prevent overflows.</li> <li>• Many respondents raised the importance of changing collection times to non-peak hours and increasing collection frequency.</li> <li>• There is an urgent need for the expansion of collection areas – rural areas are frequently excluded, and private waste collectors can 'cherry pick' areas at present.</li> <li>• Increased education and awareness are needed regarding waste segregation to prevent contamination.</li> <li>• There is a requirement for an increased availability of brown bins in particular.</li> <li>• There is a need for a glass collection bin to be made available.</li> <li>• Multiple respondents noted that recycling bins should be collected for free.</li> </ul>	A significant number of consultation responses related to collection systems. The range of responses from the general public on this issue included revising bin sizes, changing collection times to non-peak hours, expanding collection routes, increasing collection frequency, increased availability of brown bins and segregated glass collection. The expansion and enhancement of the kerbside collection system is a key focus in this Plan and the policies and actions presented reflect the need for action as noted by the public.

Volume II Part C: Focus Areas		
FA4 Collection Systems Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• House collections should be carried out for any products not easily recycled (bulbs, batteries). Kerbside collections of furniture or appliances should also be carried out multiple times a year.</li> <li>• An increased charge on black bins to promote composting and recycling was suggested.</li> <li>• It was suggested that waste collectors could send a record of bin lifts/weights every year to promote awareness.</li> <li>• There is a need for the colour of bins to be standardised.</li> <li>• There is a need for more waste collector options in the private sector, as some private companies have a monopoly on entire areas.</li> <li>• There is a requirement for exemptions on waste removal to be stopped (for example in apartment blocks with less than 500 people).</li> <li>• It was suggested that houses in Ireland should be on a register of waste collection to prevent illegal dumping.</li> <li>• Bins should be available in varying sizes to suit the needs of households that produce more or less waste.</li> <li>• There is a need for waste collection to be profit driven, as pay-by-weight system can encourage illegal dumping.</li> </ul> <p>It is acknowledged that there are a significant number of comments relating to the municipalisation of the kerbside waste collection systems noted throughout the consultation responses. However, such a significant market change requires legislative intervention which is outside the scope of this Plan and cannot be accommodated through policies in this focus area.</p>	It is acknowledged that there are a significant number of public comments relating to the municipalisation of the kerbside waste collection systems noted throughout the consultation responses. However, the current national legislative framework does not support re-municipalisation and such a significant market change requires legislative intervention which is outside the scope of this Plan and cannot be accommodated through policies in this focus area.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>• <b>Galway County Council on behalf of elected members</b> noted that a nationalised waste collection system is needed as rural areas are not suitably serviced by the private companies available.</li> <li>• Internal comments from the Local Government Sector noted that the "Purpose" and "What is it?" sections of FA4 are identical and this is an error in developing the final design that will be resolved in the final Plan.</li> </ul>	Revise text as follows: <del>To maintain and improve existing waste collection systems and provide viable alternatives for waste streams not serviced.</del> <b>Collection systems provide for the capture of waste materials and include the preliminary sorting and storage of materials to facilitate transport to treatment facilities.</b>



Volume II Part C: Focus Areas		
FA4 Collection Systems Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<ul style="list-style-type: none"> <li>The <b>Irish Food Packaging Alliance (IFPA)</b> recommended that the State moves away from manging plastic as a single commodity and collectors should be required to provide multiple plastic collections which segregate the main consumer plastic types.</li> <li><b>WEEE Ireland</b> recommended the continuing financial support for WEEE and Battery management at CA sites.</li> <li>The <b>Labour Party</b> recommended the introduction of a waste waiver scheme to support low-income households or those with a specific healthcare need.</li> <li>The <b>Rediscovery Centre</b> noted that collection systems that facilitate reuse (as a non-waste activity) should be prioritised wherever possible.</li> <li>The <b>EPA</b> noted the National Waste Report 2020 and the key actions to be led and delivered by LGS on collection systems.</li> <li>The <b>Competition and Consumer Protection Commission (CCPC)</b> acknowledges that policy affecting the household waste collection sector has undergone a number of developments since the publication of its Market Study such as the Circular Economy and Miscellaneous Provisions Act 2022 and the Waste Management (Collection Permit) (Amendment) (No. 2) Regulations 2023, which provide for enhanced consumer protection measures. However, based on a high-level review of the household waste collection market, the CCPC believes that many of the findings of the Market Study remain relevant.</li> </ul>	Organisational responses on the targeted policies and priority actions listed for this focus area included very specific comments such as the segregation of the main consumer plastic types, the collection of apartment waste should be via the provision of a universal standardised service, the continuing financial support for WEEE and Battery management at CAS and the need for collection systems that facilitate reuse. The listed targeted policies for this focus area are sufficiently broad as to facilitate the inclusion of the above suggested inclusions from the respondents with no requirement to revise the current wording of policies.
FA4 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP4.1	<b>CIWM Ireland</b> agrees with this Target Policy, except in situations where it is more effective to use Bring Centres/CAS/ Pay to Use facilities - alternatives must be managed and regulated to ensure quality standards are maintained.	The submission received is noted but does not revise the wording of this policy.
TP4.4 (and PA4.4)	<b>WEEE Ireland</b> recommends the continuing financial support for WEEE and battery management at CAS. It is highlighted that the two WEEE Compliance Schemes in 2022 contributed €1.2 million for takeback at the network of 100 plus municipal CAS where WEEE was taken back free of charge. Consideration should be given to other specific waste streams where an EPR scheme is functioning to contribute also to the running of CAS.	The submission received is noted but does not revise the wording of this policy.

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FA4 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA4.1	<ul style="list-style-type: none"> <li><b>VOICE</b> noted that speedy data collection is essential and the use of 10km squares to illustrate sensitive data (as used for biodiversity) has proven effective to both display data and maintain any GDPR or privacy concerns.</li> <li>Internal comments from the Local Government Sector noted that identifying areas of low participation/coverage is a responsibility of the service provider not WERLA. The local authority then has the power to request this information from the service provider. This is agreed and hence the shared responsibility in the fact sheet.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA4.2	<ul style="list-style-type: none"> <li><b>VOICE</b> noted that the collection of apartment waste should be via the provision of a universal standardised service which allows for habit formation in this mobile and largely renting community.</li> <li>Internal comments from the Local Government Sector note that PA4.2 refers to apartments and state that the responsibility here needs to be defined i.e., Local Government Sector with industry involvement. WERLA stated that it is not clear who will develop this strategy and who will produce the guidance. The LGS is the primary responsibility as presented in the fact sheet.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA4.3	<b>CIWM Ireland</b> noted that there is a very real and immediate need to establish a working group to look at how this might be developed, communicated and implemented at grassroots level to provide clarity.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA4.4	<b>CIWM Ireland</b> noted that this action is also in line with current hazardous waste management at CAS consultation, which is currently underway. This is particularly relevant for spent lithium batteries which are only going to increase in the waste stream going forward with the proliferation of tech and devices containing batteries, e-scooters etc.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA4 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA4.5	<ul style="list-style-type: none"> <li>The <b>IWMA</b> noted in relation to PA4.5, Pay to Use (PTU) facilities achieve very low recycling rates (less than 1% in 2020 and less than 2% in 2021) and should not be promoted in the Plan, which is largely focused around increasing recycling rates. In relation to the views raised by the IWMA that PTU facilities only achieve very low recycling rates, this does not arise where there is adequate participation in collection systems and this low recycling rate is limited to only specific circumstances.</li> <li><b>VOICE</b> noted that ensuring that CAS are accessible to active travel and or public transport is crucial to ensure these sites are accessible to all."</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA4.6	Internal comments from the Local Government Sector stated that the LGS will lead PA4.6 with guidance and technical support from WERLA.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA5 Food Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>There is an urgent need to tackle the consumption of food and the prevention of the generation of food waste.</li> <li>Consultees have advised of the need for provision of dedicated food/organic waste collection systems to all households (addressed under FA4).</li> <li>The need to promote and support the use of food sharing platforms and initiatives in particular from the retail and hospitality sectors.</li> <li>Several respondents noted the need for the Plan to tackle the generation of food waste at retail outlets.</li> <li>The Plan needs to develop and disseminate information on how to manage and store food safely to mitigate the generation of waste.</li> <li>There is a need for a greater prevalence and use of food waste recycling bins in public areas to better capture and segregate this stream.</li> <li>Supermarkets need to be discouraged from multipack/multibuy selling and there is a need for the promotion of a standard practice on best before dates.</li> </ul>	The overriding commentary from the general public on this area was the urgent need to tackle the consumption of food and the prevention of the generation of food waste. Reducing consumption was considered the primary driver in reducing the generation of waste. Other comments sought dedicated food/organic waste collection systems, promotion of food sharing platforms, better practice in the retail and hospitality sectors and greater enforcement of the Food Waste Regulations.

Volume II Part C: Focus Areas		
FA5 Food Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>There is a need for more widespread and effective enforcement of the Food Waste Regulations.</li> <li>The LGS should incentivise the availability and use of allotments to encourage circular food systems in urban areas.</li> </ul>	These comments echo the key considerations that are highlighted in Volume I and in the EPA reporting on food waste and, as such, these comments are addressed within the policy framework within the draft Plan.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector noted that more information is required in relation to developing / incentivising the indigenous composting or AD sector to treat food waste and maximise recovery of nutrients and energy from this material, whilst also supporting indigenous jobs and renewable energy.</li> </ul>	Comments made are noted and taken into consideration.
Comments from External Organisations	<ul style="list-style-type: none"> <li>The Rediscovery Centre noted that the Plan should recognise and link more directly to policy and measures related to the bioeconomy.</li> <li>The EPA suggest that the purpose of this FA is reworded as it is not the sole responsibility of this Plan to achieve these goals. While LGS have actions in the roadmap there are others who have roles too. It is recommended that this is reflected in the purpose statement and also refers to the Waste Framework Directive as the Commission will be proposing targets under this next month. The following edits are proposed to the purpose statement: To support prevention food waste in line with the UN SDG target to halve per capita global food waste by 2030 and the implementation of the National Food Waste Prevention Roadmap.</li> <li>The EPA suggest that this FA needs to refer to the Food Waste Charter.</li> </ul>	The EPA had several comments and recommendations on this focus area given its lead role for implementation of the national food waste prevention programme. The EPA also cited the key supporting policy for this focus area as the National Food Waste Prevention Roadmap and the Food Waste Charter and noted the need for collaboration in awareness campaigns such as the Stop Food Waste campaigns. Revise the purpose text in the header of the FA worksheet as follows: To <b>support the prevention of</b> food waste in line with the UN SDG target to halve per capita global food waste by 2030 and to implement the National Food Waste Prevention Roadmap.

Volume II Part C: Focus Areas		
FA5 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA5.1	<ul style="list-style-type: none"> <li>The <b>EPA</b> in its role in leading the national food waste prevention programme will collaborate with LGS on sharing/amplifying messaging from the Stop Food Waste campaigns.</li> </ul>	Comments made are noted and taken into consideration.
PA5.2	<ul style="list-style-type: none"> <li>The <b>EPA</b> is represented on the National Food Waste Recycling Steering Group and supports the annual national food waste recycling week campaign. In this action the LGS is the lead and EPA has a supporting role.</li> <li><b>Cré</b> recommended that the national food waste recycling awareness campaign managed by mywaste.ie are undertaken every year and moved into a new phase of a campaign.</li> </ul>	Revise the wording of PA5.2 as follows as per the EPA recommendation: Coordinate the response of the Local Government Sector to the <b>Food Waste Charter</b> and the specific sectoral obligations contained in the National Food Waste Prevention Roadmap including regulatory and awareness activities.
PA5.3	<ul style="list-style-type: none"> <li><b>CIWM Ireland</b> agrees with this Priority Action, however the rollout of Brown Bin to ALL households, should be aligned with food waste separation packs.</li> </ul>	This action to be revised to reflect the current status: Manage the procurement, delivery and monitoring programme for the national rollout of Food Waste Separation Packs to households.
PA5.4	<ul style="list-style-type: none"> <li>The <b>EPA</b> noted that there is a mismatch in the targeted policies column and the priority actions as prevention is not strictly management (and often management is confused as prevention), so suggest the following text: Continue to promote the prevention and optimum and preferred methods for the management of food waste in all settings. EPA suggested text: Provide guidance and support ...supply chain including post-harvest losses through the roll out of the Food Waste Charter. The EPA are the lead delivery body for the Food Waste Charter under the National Food Waste Prevention Roadmap.</li> <li><b>CIWM Ireland</b> suggested a centralised database with input along the supply chain including field losses, as with other waste streams.</li> </ul>	Comments made are noted and taken into consideration.

Volume II Part C: Focus Areas		
FA5 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA5.5	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector noted that the responsibility for PA5.5 lies with industry in the first instance to ensure that operators have the systems in place to identify low areas of coverage and uptake and to provide this information to LGS when requested so that appropriate enforcement action can be taken. It is agreed that the industry take the lead on delivery, but the LGS is responsible for enforcement which is the focus of this action.</li> </ul>	Comments made are noted and taken into consideration.
PA5.6	<p>Internal comments from the Local Government Sector have recommended adding PA5.6 to read as follows: Explore options to improve the harmonisation of the renewable feed in tariffs across the island of Ireland to incentivise the indigenous treatment of food/biowaste.</p>	Introduce a new policy as follows: <b>PA5.6</b> Explore options to improve the harmonisation of the renewable feed in tariffs across the island of Ireland to incentivise the indigenous treatment of food/biowaste.

Volume II Part C: Focus Areas		
FA6 Packaging Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>There is a need for a ban on non-recyclable packaging and increased availability of zero packaging loose produce.</li> <li>There is a need for increased education and awareness of packaging waste including for staff who have to manage returned packaging.</li> <li>A just transition plan is required for industries that use non-recyclable packaging so these may begin to phase out plastic packaging and adhere to plastic production limits.</li> <li>The implementation of a deposit return scheme for bottles, glass and cans is encouraged.</li> <li>There is a need to oblige retailers to omit unnecessary packaging and ensure all remaining packaging is recyclable and also to ban multipack production.</li> <li>Manufacturers should be made responsible for collecting and recycling the packaging produced and should be mandated to disassemble this packaging for use as raw materials where possible.</li> </ul>	A significant number of submissions were received from the general public on packaging citing a number of common themes including the prevention of packaging, the need for a ban on non-recyclable packaging, support for reusable packaging, the value of deposit return schemes as well as highlighting the obligations on manufacturers and retailers to reduce packaging at source.



Volume II Part C: Focus Areas		
FA6 Packaging Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• Companies should be made liable for using plastic packaging when sustainable alternatives are available, or alternatively a maximum limit of packaging on products sold should be implemented.</li> <li>• There is a need to standardise packaging in all industries to provide ease of re-use by producers and encourage sustainable packaging options such as tin, glass, and biodegradable bags.</li> <li>• The reuse of packaging by customers is to be encouraged, along with sustainable packaging options being offered (such as produce bags in supermarkets). Bulk items should be sold in loose containers, and the pay per weight system should be implemented for produce.</li> <li>• Incentives (such as discounts) to use reusable cups/containers should be implemented within businesses.</li> <li>• There is a need for a supermarket onsite depot for cardboard packaging to prevent recyclable waste contamination and to make supermarkets responsible for reducing packaging through legislation and taxation.</li> <li>• There is a need for an increased prevalence of refill stations, and it is important to make these cost effective. This could be achieved through grants and tax relief to these zero waste/refill shops.</li> <li>• There is a need for government guidelines and targets for producers and distributors on packaging. There is also a need for more legislation such as a green packaging tax or a retailer tax. A packaging levy should be placed on non-essential items.</li> <li>• There is also a need for a tax on excess packaging, and to tax products at point of import, based on packaging.</li> <li>• At least 20% of the label on packaging should provide detailed recycling requirements, and labels should be printed directly on to packaging to prevent the need for further packaging.</li> <li>• Packaging materials should be recycled locally.</li> <li>• There is a need to promote the EPR schemes for packaging.</li> <li>• Funding needs to be made available for the development and innovation of recyclable packaging.</li> </ul>	Each of these issues is addressed within the policies and actions for packaging in the draft Plan and these comments reinforce the view that the draft Plan has been suitably comprehensive in addressing the key issues and drivers.

Volume II Part C: Focus Areas		
FA6 Packaging Waste Submissions - General Themes		Amendments to the Plan
Comments from the Local Government Sector	Internal comments from the Local Government Sector suggest that PA6.4 is not a task for which the LGS is responsible, but the view is taken that this action is a responsibility of all key partners.	Comments made are noted and taken into consideration.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• The <b>IFPA</b> stated serious concerns regarding the implications of the plastic Packaging Waste Regulation and the requirement for a minimum use of recycled material. Although IFPA fully support the principle behind this policy, in practice, it will have serious consequences on the industry's ability to source recycled feedstock.</li> <li>• <b>Cré</b> noted that there are no regulatory requirements for any particular packaging or product to be compostable.</li> <li>• <b>Stoneybatter Sustainability Coalition</b> noted national targets should be set on packaging reduction and an increasing tax levied on companies who do not provide 100% recyclable packaging and for each gram of packaging used in their product regardless of whether it can be recycled or not.</li> <li>• The points raised by the <b>IFPA</b> and <b>VOICE</b> highlighted the significant challenge posed by the requirements of the proposed amendment of the Packaging and Packaging Waste Regulations and while these will take effect outside the timeframe of this Plan, early engagement with stakeholders on these pending requirements (once adopted) will be a key element for this focus area.</li> </ul>	The IFPA and VOICE have noted significant medium term challenges facing the packaging sector under the upcoming Packaging and Packaging Waste Regulations which will ensure that all packaging on the EU market is reusable or recyclable in an economically viable way by 2030. While these measures will take effect outside the timeframe of this Plan (post 2029), it is considered prudent that this future direction is given due regard in the Plan both through summary detail on Volume I (as part of the policy update) as well as through revision to PA6.2 and PA6.4 to include reference to future commitments.

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FA6 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP6.2	<ul style="list-style-type: none"> <li>• <b>CEWEP</b> supports source segregation in line with the principles of the waste hierarchy and the circular economy.</li> <li>• <b>CIWM Ireland</b> agrees with this Target Policy but without adding disproportionate costs.</li> </ul>	The submission received is noted but does not revise the wording of this policy.
TP6.3	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> does not see how the LGS will be able to deliver this Target Policy without a sufficient budget being allocated for given these activities. Awareness activities should be co-ordinated nationally, in addition to local responses as required.</li> </ul>	The submission received is noted but does not revise the wording of this policy.

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FA6 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA6.1	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> suggests this must be in alignment and on a national basis and that the compliance scheme(s) align with the campaigns.</li> </ul>	Comments made are noted and taken into consideration.
PA6.2	<ul style="list-style-type: none"> <li>• <b>VOICE</b> welcome the promotion of reusable packaging and refills in the retail sector in PA6.2, however binding targets are required in place of promotion. Under the upcoming Packaging and Packaging Waste Regulations in amendments currently being discussed on an EU level in Article 25 'Obligations related to refill' includes the requirement for 20% of the floor surface of shops larger than 400 square metres must be fitted with refill systems.</li> <li>• <b>CIWM Ireland</b> agrees with this Priority Action but again this would be on a national basis.</li> </ul>	PA6.2 is to be revised as follows with a more forward looking focus: Promote best practice <b>and raise awareness of future obligations</b> in the retail sector <b>on reducing packaging waste</b> including in-store packaging collection systems, deposit return schemes, promotion of reusable packaging and product refills.
PA6.3	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> agrees with this Priority Action and suggests that the operating body of the DRS would be main entity responsible, not the LGS. Regarding PA6.3, the operating body of the DRS will be the main entity responsible for the scheme, but the LGS have a role in promoting this scheme to raise awareness and effect behaviour change. No proposed amendment to the priority action.</li> </ul>	Comments made are noted and taken into consideration.
PA6.4	<ul style="list-style-type: none"> <li>• The EPA's focus on behavioural change campaigns and projects targeting households will link to (i) the EPA role in leading the national waste prevention programme (ii) insights from behavioural insights studies (iii) insights from waste statistics and waste characterisation studies.</li> <li>• <b>CIWM Ireland</b> does not agree that LGS, DECC and EPA have the required material knowledge to promote materials as recycled. This would be product specific and though the concept of x% recycled material contained within products may help to stimulate circularity it is important to note that this may not always be the most beneficial environmental option.</li> <li>• Internal comments from the Local Government Sector noted that PA6.4 is not a task for the LGS.</li> </ul>	PA6.4 is to be revised as follows with a more forward looking focus: Promote the use of recycled materials in packaging with designers and manufacturers <b>to support the transition to the requirements of the revised Packaging and Packaging Waste Regulations.</b>
PA6.5	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> noted that increased participation is in the interest of all improving overall environmental outcomes and in target achievement, whilst lessening the burden on enforcement. It is worth noting that compliance scheme operators and LGS will have better outcomes working collaboratively to bring participation levels up.</li> </ul>	Comments made are noted and taken into consideration.

Volume II Part C: Focus Areas		
FA7 Single Use plastic (SUP) Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• There is a need for the installation of public water fountains to prevent the purchase of single use plastic bottles.</li> <li>• Bottle banks should be widely available for plastic bottle recycling, and free public facilities for the recycling of plastic should also be made available.</li> <li>• A return at point of purchase system should also be put in place for bottles and cans with an added financial incentive.</li> <li>• The installation of bottle deposit systems should be accelerated and include 500ml bottles.</li> <li>• A phased ban on producing single use plastics should be introduced, and single use plastic waste should be prohibited from advertisements (including vapes). State interventions should legislate plastic production limits.</li> <li>• There is a need for a just transition for companies that would be affected by the phase out of single use plastics.</li> <li>• Single use plastics should be replaced with multi use alternatives, biodegradable alternatives, or cardboard/more sustainable options. Alternative options for single use plastics (such as in PPE) should be made available.</li> <li>• State interventions should legislate plastic production limits.</li> <li>• The sale of plastic bottles should be banned, particularly in schools.</li> <li>• An increased tax on single use plastics should be implemented, and producers of these plastics should also be taxed. Extended producer responsibility should be implemented so that companies are responsible for recycling their products (take back programmes).</li> <li>• There is a need to incentivise industry to innovate and manufacture circular products.</li> <li>• Single use plastics should be restricted in fast food and other businesses.</li> <li>• A fine should be implemented for Single use plastics found in residual waste bins.</li> </ul>	Much of the commentary from the general public on this topic related to plastic bottles and the need for public water fountains to prevent generation as well as recycling facilities and deposit return schemes to capture this stream. More general comments related to outright bans or levies on SUP materials, product refills as well as the provision of sustainable and biodegradable alternatives. As with packaging, the key issues raised by the public have been addressed in the draft Plan which endorses the position taken in the Plan that the major community concerns have been tackled.

Volume II Part C: Focus Areas		
FA7 Single Use plastic (SUP) Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• A retailer tax for single use plastics sold should be implemented.</li> <li>• There is a need for increased regulation for plastic bags in shops or a ban on all plastic bags.</li> <li>• There is a need for improved refill options to prevent the purchasing of single use plastics.</li> <li>• Pay by weight products should cost the same as pre-packaged products to prevent the unnecessary purchase of single use plastics.</li> <li>• There is a need for education on how to recycle single use plastics and how much plastic in recycling bins gets recycled (public awareness campaign).</li> <li>• There is a need to provide an option for consumers to use their own containers in shops instead of relying on single use plastics.</li> </ul>	
Comments from the Local Government Sector	There have been no general submissions from the Local Government Sector in relation to FA7 but specific issues with policies and actions are noted below.	No comments made from the Local Government Sector.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• <b>Stoneybatter Sustainability Coalition</b> noted the success of the plastic bag levy on customer behaviour and how that could be implemented for other single use waste streams.</li> <li>• <b>VOICE</b> noted that the policies and actions under this focus area are strong, with targets and actions focused on implementing and monitoring levies and prohibitions of single use plastics.</li> <li>• <b>IFPA</b> expressed concern regarding the classification of plastics, it should be differentiated if a plastic is recyclable or single use. They also expressed the need to reduce and/or remove packaging from fruit and vegetables.</li> </ul>	There were limited organisational comments on this focus area that require the revision of the proposed policy base in the draft Plan and comments received were generally supporting of the Plan measures. A minor revision to PA7.2 is required to better reflect the LGS role in controlling events through the licensing process.

FA4 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP7.1	<ul style="list-style-type: none"> <li>• <b>VOICE</b> noted that sanitary towels (pads), tampons and tampon applicators are listed in the Single Use plastics Directive (2019) as single-use plastic products covered by Article 10 on awareness raising, however, this is not currently reflected in national plans for Ireland. VOICE ask that this material stream be included through implementation of this target policy as it is an overlooked area in single use plastics policy as a result of the sensitive nature of the topic. Regarding TP7.1 and the view from VOICE, this statement is correct, and these products are included in the Directive which been transposed through S.I. No 516 of 2021, as amended by S.I. No. 136 of 2022 and these products are also included in national legislation. It is not necessary to single out any individual product in this Plan and there are no proposed changes to TP7.1.</li> </ul>	The submission received is noted but does not revise the wording of this policy.
PA7.1	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> agrees with this Priority Action.</li> <li>• Internal comments from the Local Government Sector suggest that the responsibilities should be Industry/Compliance Schemes as opposed to the LGS, but the monitoring task lies with the key partners.</li> </ul>	Comments made are noted and taken into consideration.
PA7.2	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> agrees with this Priority Action.</li> <li>• Internal comments from the Local Government Sector suggested that the responsibilities should be lead and supported by the Local Government Sector as proposed in the responsibility assignment.</li> </ul>	Revise the wording of this action as follows: Implement best practice with regard to single use plastic in the <b>licensing of</b> hospitality events and community sectors and prepare best practice guidelines for the sector for the elimination of single use plastic.
PA7.4	<ul style="list-style-type: none"> <li>• Internal comments from the Local Government Sector suggested the responsibilities should be supported by Compliance Schemes which is agreed.</li> </ul>	Comments made are noted and taken into consideration.



Volume II Part C: Focus Areas		
FA8 Construction And Demolition Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>Investment is needed to transform construction waste into useable materials and encourage innovation. Innovation in the construction sector could also be driven by further taxation and through leveraging costs.</li> <li>The creation of construction materials from recycled waste is encouraged.</li> <li>There is a need for the establishment of a recycling network for construction wastes (such as pallets). Alternatively, construction materials such as pallets could be sourced through a leasing scheme or be returned to the supplier for recycling.</li> <li>A fine should be put in place for construction companies that do not segregate construction and demolition wastes correctly.</li> <li>There is a need for further understanding of harmful materials in construction products, and a targeted approach to phase them out.</li> <li>Research into hemp as an alternative construction material should be carried out.</li> <li>There is a need for construction and demolition companies to plan and invest in making necessary changes, including the enforcement, and auditing of wastes.</li> <li>The carbon footprint of demolition should be considered at the planning stage of construction.</li> </ul>	There were limited submissions made on construction and demolition waste by the general public but the key theme raised related to the need for innovation in the sector to increase the recycling of construction wastes into other construction materials (both aggregates as well as other materials such as pallets). Financial incentives/penalties on performance as well as enforcement were also noted. Each of these areas are addressed in the policies and actions in the draft Plan and not specific revision is required to include these comments.
Comments from the Local Government Sector	<p><b>Donegal County Council on behalf of elected members</b> expressed concerns with the possibility of five to seven thousand homes within the County that have defective blocks, these will either be partially or fully demolished which will result in a huge amount of Construction and Demolition (C&amp;D) waste.</p> <p>There have been no internal submissions from the Local Government Sector in relation to FA8 but specific issues with policies and actions are noted below.</p>	Internal Local Government Sector feedback suggested minor amendments to PA8.4 and PA8.5 to address construction projects rather than sites as a more appropriate term and this is actioned.

Volume II Part C: Focus Areas		
FA8 Construction And Demolition Waste Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<ul style="list-style-type: none"> <li><b>The Ireland Brownfield Network (IBN)</b> suggested a number of changes to the Article 27 process such as independent review and application to a wider remit of soil and stone materials.</li> <li><b>IBN</b> suggested that an independent review of Resource &amp; Waste Management Plans for construction and demolition projects is valid and may ease the enforcement burden on the LGS. However, the EPA guidelines do not include any such requirement for independent review at this point to make the guidelines as accessible to contractors and design teams as possible to ensure wider implementation. Independent review may be a consideration in the future, but it is not proposed to amend this policy wording at this point.</li> <li><b>The Green Party</b> suggested building regulation and the planning requirements of LGS such as the requirement for an active bill of quantities and the publication of waste statistics by contractors to communicate performance to the public and the construction sector.</li> </ul>	<p>The Ireland Brownfield Network (IBN) suggested a number of changes to the Regulation 27 process such as independent review and application to a wider remit of soil and stone materials but such changes are outside the scope of this Plan.</p> <p>The IBN and the Green Party suggested greater regulation of construction projects but this is currently addressed through PA8.4 which requires wastes to be documented in a transparent manner and regulated through planning and no further additions are required.</p>

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FA8 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP8.2	<ul style="list-style-type: none"> <li>• <b>CEWEP</b> supports TP8.2 and suggests that this also apply to the development of markets for incinerator bottom ash aggregate so that it too can contribute to a future secondary materials market. CEWEP comments on TP8.2 are addressed more directly through priority action PA13.2 in relation to bottom ash.</li> </ul>	The submission received is noted but does not revise the wording of this policy.
TP8.3	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> agrees with this Target Policy, however, there is a need for education and training in the implementation and regular reviews by an appropriate audit body (NOAC &amp; WERLA for example) to ensure that the requirements of these documents are not only being implemented but also attained. There is a pressing need for dedicated teams to be set up in the Environment Section of each LA to ensure compliance with the requirements of the Construction Resource Plans, in terms of checking their suitability at planning stage as well as site implementation. It is agreed that training is required, and this will be provided as mandated in the wider policy base throughout the Plan. As such, there is no requirement to revise the policy with any specific reference to training.</li> <li>• The <b>IBN</b> welcomed the inclusion of TP8.3 and the requirement for Resource &amp; Waste Management Plans for construction and demolition projects but suggests that this may be further enhanced with a requirement for independent review and approval as in other jurisdictions. The EPA guidelines do not include any such requirement for independent review at this point to make the guidelines as accessible to contractors and design teams as possible to ensure wider implementation. Independent review may be a consideration in the future, but it is not proposed to amend this policy wording at this point.</li> </ul>	The submission received is noted but does not revise the wording of this policy.

FA8 Submissions Specific Issues - Priority Actions		Revisions to Targeted Policies
PA8.3	The EPA will support the LGS by providing guidance and information for Regulation 27 by-product (for site-won asphalt = road plannings and greenfield soil and stone) and Regulation 28 end of waste (for recycled aggregates) and prioritise the use of materials arising from national end-of-waste or by-product decisions.	Comments made are noted and taken into consideration.
PA8.5	Based on internal review, changes have been noted.	Based on internal review the following changes are noted: Explore the potential to segregate waste streams in mixed waste skips to minimise contamination and maximise reuse, recycling and circularity on construction sites <b>projects</b> and provide guidance to the sector.
PA8.6	Based on internal review, changes have been noted.	Based on internal review the following changes are noted: Allocate available resources, and identify any additional resources required, to consistently monitor construction and demolition sites <b>projects</b> to assess compliance with the project Resource & Waste Management Plan and apply appropriate enforcement measures to ensure compliance.

Volume II Part C: Focus Areas		
FA9 Textiles Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• There is a sense of urgency to resolve textile pollution via development of a central textile recycling facility as textile waste is not commonly collected at CAS.</li> <li>• A textile recycling facility would enable swap, reuse and repair of clothing and shoes, as well as repurposing of end-of-life textiles that cannot be mended or reclaimed.</li> <li>• Charity shops and the proposed textile recycling facility need to be supported with adverts and campaigns to improve visibility and remain in public consciousness.</li> <li>• The distance to clothes banks and their low prevalence across counties were raised frequently.</li> <li>• Taxes on fast-fashion suppliers for customers were prominent themes within the submissions.</li> <li>• Bans on non-biodegradable products used in clothing were requested to reduce the presence of textile microplastics in waterways. Hemp was suggested as a sustainable alternative to cotton.</li> <li>• The bans are implied to be future focused and not immediate, facilitating industry research and designing of circularity through innovation.</li> </ul>	<p>A number of issues were raised by the general public in relation to textiles including the urgent need to address consumption and 'fast fashion', support for charity shops and the voluntary sector, the availability of clothes banks, microplastics in textiles and the development of a central textile recycling facility. These issues are largely addressed in EU policy direction and supported by the policy position presented in the draft Plan and no revisions are required. While the suggestion for a central textile recycling facility is not expressly stated in the draft Plan, support for such a development (whether private or public) is supported through TP13.1 on recycling infrastructure in general.</p>
Comments from the Local Government Sector	There have been no submissions from the Local Government Sector in relation to FA9 but specific issues with policies and actions are noted below.	No comments made from the Local Government Sector.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• <b>Stoneybatter Sustainability Coalition</b> noted the success of the plastic bag levy on customer behaviour and how that could be implemented for other single use waste streams.</li> <li>• <b>VOICE</b> noted that the policies and actions under this focus area are strong, with targets and actions focused on implementing and monitoring levies and prohibitions of single use plastics.</li> <li>• <b>IFPA</b> expressed concern regarding the classification of plastics, it should be differentiated if a plastic is recyclable or single use. They also expressed the need to reduce and/or remove packaging from fruit and vegetables.</li> </ul>	There were limited organisational comments on this focus area that require the revision of the proposed policy base in the draft Plan and comments received were generally supporting of the Plan measures. A minor revision to PA7.2 is required to better reflect the LGS role in controlling events through the licensing process.

Volume II Part C: Focus Areas		
FA9 Textiles Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<ul style="list-style-type: none"> <li>• <b>VOICE</b> stated that Focus Area 9 is heavily research oriented without displaying any concrete targets.</li> <li>• <b>VOICE</b> also noted the need for national frameworks and directives to harmoniously extend the separate collection stream for textile, which will be mandatory under EU law in 2025.</li> <li>• <b>Stoneybatter Sustainability Coalition</b> stated that Ireland needs to break the fast-fashion model and return to a more sustainable consumption pattern for clothing and textiles, they also recommend a blanket ban on synthetic non-bio-degradable materials in clothing.</li> <li>• The <b>Rediscovery Centre</b> stated that the Plan should build on recommendations from the NATEX and Circular Textiles research and, in line with recommendations above, recognise the need for infrastructure and develop a plan for rolling out infrastructure to handle textiles collected as well as collection infrastructure.</li> <li>• The <b>Rediscovery Centre</b> also noted that it will also be essential to recognise and support the role of existing third sector textile collectors who are involved in local resale of textiles in the design of any textile collection schemes or collaborations.</li> </ul>	<p>Several organisational respondents cited the EPA funded research into textiles (Nature and Extent of Post Consumer Textiles) as a key factor for consideration and this research has informed the development of the policies and actions in the draft Plan. One of the first recommendations in this EPA research report is that 'There is a pressing need to obtain better data on the flows and fate of post-consumer textiles' and action PA9.2 seeks to address this recommendation and gather more detailed information to inform future policy development. Other submissions were generally positive on this relatively new area with the only suggested amendment from the EPA who pointed out that DECC should be included as responsible for the suite of actions in this focus area as chair of the Textiles Working Group.</p>



Volume II Part C: Focus Areas		
FA9 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP9.2	<b>CIWM Ireland</b> noted that recent EPA funded research into textiles (Nature and Extent of Post Consumer Textiles, Circular Textiles) identifies a clear need to establish a national standardised reporting system to support data collection on postconsumer textile collections. The EPA report on the NATIX has been reviewed and referenced in developing the policies and actions in this focus area. One of the first recommendations in this report is that 'There is a pressing need to obtain better data on the flows and fate of post-consumer textiles' and this priority action seeks to address this recommendation and gather more detailed information to inform future policy development. The recommendations of this report as noted by VOICE have been used to inform the policy development in the draft Plan (excluding fiscal measures which are outside the scope of the Plan).	The submission received is noted but does not revise the wording of this policy.
TP9.4	<b>CIWM Ireland</b> noted that research through the EPA funded Circular Textiles project (due to be published shortly) identifies the disjointed nature of the sector as a key barrier.	The submission received is noted but does not revise the wording of this policy.

FA9 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA9.1	• <b>CIWM Ireland</b> noted that this should tie in with any coordinated and multiagency approach to communications and citizens engagement. Responsibility however, we feel, should rest with the Local Government Sector in conjunction with the National Centre for Circular Economy & DECC."	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA9 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA9.2	<p>The <b>EPA</b> suggested to include DECC as the lead as chair of the Textiles Working Group.</p> <p><b>VOICE</b> noted that an assessment has already been done, both through the NATIX report (EPA) and the pilot study on separate collection methods led by the CRNI. Challenges, barriers and gaps have been identified in those reports alongside recommendations by the EPA in 2021. Recommendations include:</p> <ul style="list-style-type: none"> <li>• Introduce measures on VAT and commercial rates.</li> <li>• Undertake steps for oversight and transparency in textile bank operation.</li> <li>• Investigate support for the further developments of indigenous sorting, reuse and downcycling industries.</li> <li>• Obtain and improve data in terms of post-consumer textile flows (enhanced transparency).</li> </ul> <p>The commercial collectors and their contractors (LGS) should:</p> <ul style="list-style-type: none"> <li>• Not be able to advertise any REUSE or RECYCLING activity unless evidence can be provided that at least 60% of the textile waste handled is either reused or recycled downstream.</li> <li>• Be defined as collector/handlers of post-consumer textile waste.</li> </ul> <p><b>CIWM Ireland</b> noted that both the Nature and Extent of Post Consumer Textiles and Circular Textiles EPA funded studies in the last two years have assessed and defined the extent of textile consumption and post-consumer textile management, including an analysis of collection options and infrastructure and defined challenges, barriers and gaps to progress. This priority action should build on the research when it is published.</p>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA9.3	<ul style="list-style-type: none"> <li>• The <b>EPA</b> suggested that DECC should lead this action as chair of the Textiles Working Group, and this has a number of activities linked to collaboration.</li> <li>• <b>CIWM Ireland</b> noted that recent research should be used to inform options for textile collections. Any design of new collection systems must consider the important role of textile collectors from the third sector, many of which are registered charities and are the primary operators.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA9 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA9.4	<ul style="list-style-type: none"> <li>The EPA suggested to include DECC as a lead role as chair of the Textiles Working Group and this has a number of activities linked to this collaboration piece.</li> <li>CIWM Ireland noted that it will be important to recognise and support existing textile collectors from the third sector which provide the primary channel for local reuse through second hand retail.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA9.5	<ul style="list-style-type: none"> <li>The EPA suggested that DECC lead as chair of the Textiles Working Group.</li> <li>VOICE noted that targets on collection rates should be set such as a minimum of 50% capture of used textile by 2026; and 65% by 2029. A mandatory separate collection stream should be available in each county by 2025.</li> <li>CIWM Ireland noted that it will be important to recognise and support existing textile collectors from the third sector which provide the primary channel for local reuse through second hand retail.</li> </ul> <p>The suggested requirements on, and targets for, commercial collectors are noted but until further information is available on barriers and opportunities for textile collection, such measures are not proposed at this phase of the Plan development.</p>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA10 Hazardous Waste Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>A consultee has suggested the need for a national hazardous waste collection (including medicines and medical waste) for every county.</li> <li>A consultee provided an example of paint recycling by the Rediscovery Centre which should be more accessible. The Rediscovery Centre collects paint from recycling centres and recycles it to create new colours. The service prepares paint for reuse, which reduces the environmental impact of paint disposal in Ireland.</li> <li>There is a need for the banning of disposable vapes. The disposal of vapes include plastic waste, hazardous waste, and electronic waste. The e-liquid within a vape would include heavy metals and would be considered hazardous waste due to its toxic properties to the environment.</li> <li>There is a need to reduce battery waste, it has been recommended that only government approved top quality rechargeable batteries should be available.</li> <li>Several respondents noted the need to address lithium-ion batteries in the Plan.</li> </ul>	There were limited submissions on this focus area from the general public but comments included the need for a national hazardous waste collection (including medicines and medical waste) for every county, the banning of disposable vapes and the need to address lithium-ion batteries in the Plan. These issues are addressed through EU or national policy (including the National Hazardous Waste Management Plan) and therefore supported in the draft Plan which is based on these instruments. The specific reference to lithium-ion batteries is important and action PA10.1 will be revised to specifically include this material.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector have noted that there will be an overlap in FA10 with the National Hazardous Waste Management Plan which the EPA has responsibility for developing and implementing. Internal comments from the Local Government Sector recommend that it would be beneficial to cross reference that plan and to clarify how the two plans differ from each other in the scope of how they deal with different hazardous wastes.</li> </ul>	Comments made are noted and taken into consideration.

Volume II Part C: Focus Areas		
FA10 Hazardous Waste Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<ul style="list-style-type: none"> <li>The <b>EPA</b> noted that it is essential that a transition to a circular economy consider and address the issue of hazardous chemicals – and not just by minimising or preventing these chemicals entering the economy in the first place (e.g., at design stage) but also by removing these types of chemicals already in circulation. As such, consideration needs to be given to measures to prevent restricted and banned chemicals from entering recycling waste streams including Persistent Organic Pollutants (POPs), mercury and those chemicals restricted under the REACH Regulations.</li> <li>The <b>EPA</b> also noted that consideration needs to be given to what measures are required to assist in ensuring that construction waste materials containing hazardous materials above the relevant concentrations do not enter recycling waste streams. Similarly, consideration needs to be given to measures to assist in ensuring old electrical and electronic waste items that contain POPs are identified and appropriately segregated and managed.</li> <li>Similarly, <b>CEWEP</b> noted that POPs and Poly-fluoroalkylated (PFAS) contaminated waste must be considered in this draft Plan. POPs contaminated waste, particularly bulky waste, should be considered in all relevant targeted policies and priority actions, for example for the source segregation and collection of such material, the recovery capacity required to treat such material and its impact on future recycling rates.</li> </ul>	Organisational comments were limited and positive where received and the EPA made a number of operational comments on the implementation of the National Hazardous Waste Management Plan and the role of the LGS.

FA10 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP10.1	<b>CIWM Ireland</b> noted that clear product labelling and information on alternative options for consumers will lead to prevention. LGS have a critical role to play with regard to prohibiting the use of hazardous and noxious chemicals by staff, contractors and affiliated groups like Tidy Towns and Pride of Place.	The submission received is noted but does not revise the wording of this policy.
TP10.2	<b>CIWM Ireland</b> agrees with this Target Policy.	The submission received is noted but does not revise the wording of this policy.

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FA10 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA10.1	The <b>EPA</b> noted that the Equivalent Key Action in NHWMP is 5.1 and is the responsibility of the RWMPOs – Both plans should be aligned. The policies and actions developed for this focus area have had due regard to the LGS commitments under the EPA National Hazardous Waste Management Plan 2021 – 2027 (NHWMP) to ensure that both plans are aligned as required by the EPA.	Revision of the policy required as follows: Conduct awareness raising campaigns to highlight best-practices and alternatives, with initial focus on paints, cleaning products, <b>lithium-ion batteries</b> and gardening chemicals.
PA10.2	The <b>EPA</b> noted that the Equivalent Key Action in NHWMP is 5.1 and is the responsibility of the RWMPOs – Both plans should be aligned.	Comments made are noted and taken into consideration.
PA10.3	The <b>EPA</b> noted that the Equivalent Key Action in NHWMP is 5.1 and is the responsibility of the RWMPOs – Both plans should be aligned.	Comments made are noted and taken into consideration.
PA10.4	<ul style="list-style-type: none"> <li>The <b>EPA</b> noted that the Equivalent Key Action in NHWMP is 5.1 and is the responsibility of the RWMPOs – Both plans should be aligned.</li> <li><b>CIWM Ireland</b> agrees with this Priority Action.</li> </ul>	Comments made are noted and taken into consideration.
PA10.5	The <b>EPA</b> noted that the language used in PA10.6 is not clear. The closest Equivalent Key Actions in NHWMP are 2.1 to 2.3, however, NTFSO could also be considered as a stakeholder here.	Comments made are noted and taken into consideration.



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FA11 Infrastructure Regulatory Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<ul style="list-style-type: none"> <li>• One consultee raised the point that there should be a ban on the export of all waste, stating if the State cannot process it, don't produce it.</li> <li>• The need for public education through tours and school trips at waste facilities.</li> <li>• The need for an improved regulation of waste disposal companies, consultees have expressed concerns that local companies have not been assessing the contents of the bin (even when alerted about potential contamination).</li> <li>• Concerns were raised regarding communication of changes to local waste infrastructure. For example, does the announcement to scale up the sea gull bins in the city, mean those who use bags for waste disposal, will be also given a method to separate food waste.</li> <li>• As the need for biological treatment is growing rapidly for both source segregated organics and MSW fines to comply with EU Directives, it has been recommended that the new NWMPCE encourages the development of additional capacity and new infrastructure in this area.</li> <li>• A need for the provision of more final treatment infrastructure across the country.</li> <li>• A need for all County Development Plans to promote the development of all types of waste management infrastructure within enterprise and/or industrial (or other) zoning objectives.</li> <li>• The EU considers that Ireland is at risk of missing the MSW recycling rate targets and recommends 'Further develop waste treatment infrastructure, including increasing bio-waste treatment capacity and supporting home composting.'</li> <li>• The need for more versatile waste facilities in the south and east where spare capacity is low.</li> <li>• A need for more detailed statistics on waste category tonnages collected at County and Local Authority Level (and at even more local granularity). Furthermore, consultees seek advice on how to access this data, and how to derive waste emission baselines, along with intervention emission forecasts at local level.</li> </ul>	<p>There were limited comments from the general public on the regulation of infrastructure but some of the key issues raised included the need for a ban on the export of all waste which is not possible, better regulation as well as greater education and awareness of waste facilities and operation. Each of these issues is addressed in the policies and actions for this focus area in the draft Plan.</p>

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FA11 Infrastructure Regulatory Submissions - General Themes		Amendments to the Plan
Comments from the Local Government Sector	There have been no submissions from the Local Government Sector in relation to FA11 but specific issues with policies and actions are noted below.	No comments made from the Local Government Sector.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• The <b>Regional Assemblies</b> noted the need for regionally important infrastructure and capacity enhancements necessary to achieve the NPF objective of Balanced Regional Development and support the ambitions for targeted population and economic growth in each RSES.</li> <li>• The <b>EPA</b> recommended that the vulnerability of Ireland's treatment system is addressed in the lifetime of the Plan with the aim to become self-sufficient for the treatment of residual municipal waste.</li> </ul>	<p>In general, the organisational responses to the policies and actions in this focus area are positive and supportive in helping to improve information on capacity and consent processes and no revisions are required in the final Plan prior to implementation. In relation to the vulnerability of Ireland's waste treatment system, the RWMPO provide quarterly reports on key waste streams (MSW, C&amp;D) that highlight capacities and vulnerabilities on a 'live' basis that allows for regular tracking of capacity. The need for a standalone report on vulnerability is questioned as while it would be valuable in providing a measure at any given time, the changing nature of generation rates and available capacity requires a more dynamic evaluation of vulnerability as currently undertaken by the RWMPO.</p>

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FA11 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP11.1	<ul style="list-style-type: none"> <li>The <b>IWMA</b> raised a number of issues including to the siting guidance, the IWMA considers these to be overly restrictive and includes a rationale for changes.</li> <li><b>CEWEP</b> questions the rationale for this targeted policy, as waste facility siting guidance for new infrastructure which is too prescriptive or specific has the potential to exclude otherwise suitable sites.</li> <li><b>CIWM Ireland</b> believes any new infrastructure initiatives must follow the waste hierarchy, site facility guidance, the SID process including scoping EIAR.</li> </ul>	<p>TP11.1 refers to the Siting Guidelines presented in Appendix 9 of Volume IV of the Plan. The IWMA and CEWEP noted a range of concerns in relation to the Siting Guidance and the prescriptive nature of the guidance. However, this guidance includes for a measure of flexibility which is clearly stated in the following extract (emphasis added):</p> <p>This document includes setback distances to neighbours (i.e., residential properties and businesses) and national roads, which are intended to guide the siting of activities. They balance economic and development considerations alongside planning, environmental and community concerns. <u>There is scope to reduce the guidance distances through appropriate planning conditions and mitigation measures.</u> For example, access distances can be extended – provided a project developer can demonstrate that the quality of roads accessing the planned location is suitable and potential impacts on the local community will be kept to a minimum.</p> <p>The confusion would suggest that this flexibility needs to be further highlighted within the Plan and/or Guidance to ensure that both developers and planning regulators are suitably informed on the detail of the guidance.</p>
TP11.2	<b>CEWEP</b> supports this targeted policy.	The submission received is noted but does not revise the wording of this policy.
TP11.3	<ul style="list-style-type: none"> <li><b>CEWEP</b> supports this targeted policy.</li> <li><b>CIWM Ireland</b> agrees with this Target Policy."</li> </ul>	The submission received is noted but does not revise the wording of this policy.
TP11.4	<b>CEWEP</b> supports this targeted policy. This policy is devised to collaborate with the EPA and ABP to help streamline the consenting process for circular infrastructure through the development of a capacity register (PA11.2) and supporting the review of SID applications (PA11.4). These measures are supported by consultees in the current form.	The submission received is noted but does not revise the wording of this policy.
TP11.5	<b>CIWM Ireland</b> agrees with this Target Policy.	The submission received is noted but does not revise the wording of this policy.

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FA11 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA11.1	<ul style="list-style-type: none"> <li><b>CIWM Ireland</b> suggested that all infrastructural development must be in compliance with the above and all related environmental legislation/ SID as appropriate.</li> <li>Internal comments from the Local Government Sector noted that PA11.1 is only listed for the Local Government Sector and suggest that this should equally apply to the EPA.</li> </ul>	Based on the internal LGS comments, this action is reworded as follows: Ensure infrastructural developments are in compliance with the waste hierarchy, and siting guidance <b>and the wider policy framework of this Plan</b> through engagement with An Bord Pleanála, and Planning Authorities <b>and other relevant bodies.</b>
PA11.2	<ul style="list-style-type: none"> <li>The <b>EPA</b> have developed a National Waste Capacity Register for EPA licensed sites, and the LGS (through the NWCPO) have a register for Waste Facility Permits and Certificates of Registration. Recommend that EPA are joint leads with LGS.</li> <li><b>CIWM Ireland</b> noted that at present, the planning process takes years to get facilities constructed due to the long drawn out planning and environmental consent process. The uncertainty of the decision-making process timelines needs to be addressed – Minister Ossian Smith has suggested new legislation to include binding determination times by the EPA / ABP / LGS for regulatory process, leading to guaranteed determination timelines. The current two-year timeline to surrender a Waste Licence for low environmental risk infrastructure is ridiculous, let alone higher order infrastructure.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

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FA11 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA11.3	<ul style="list-style-type: none"> <li>The <b>EPA</b> are responsible for issuing the Waste Facility Permit to the LGS however the onus for this action is on LA to lead and obtain the authorisations. LGS to address capacity and to ensure the sector provides for sufficient capacity in the first instance.</li> <li><b>CIWM Ireland</b> agrees with this Priority Action, but the proposed solution does not optimise waste recovery / reuse. CIWM Ireland believe that there should be one facility per Municipal District, not per County. If the current proposal were implemented, a large geographical (in size) County like Cork (10% of Irelands landmass) with 10 Municipal Districts would only have one facility. One of the recommendations of the CCMA document on managing road making materials, referenced earlier, was one such facility per Municipal District. The purpose of this action relates to storage of waste from road maintenance and other local authority construction projects and the requirement for 'at least one' facility does not prohibit larger counties like Cork developing multiple facilities as required. No proposed change to this action.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA11.4	<b>CIWM Ireland</b> agrees with this Priority Action.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume II Part C: Focus Areas		
FA12 Reuse/Repair Infrastructure Submissions - General Themes Raised		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>The need for public and school visits to repair/reuse infrastructure facilities.</li> <li>The need to incorporate repairing goods into the school curriculum with workshops and classes.</li> <li>A common theme amongst consultees is the need for craft centres, these centres could include mending clubs where local experts fix broken items and provide classes and share skills to allow the public to repair common household items.</li> <li>Promotion of the reuse and repairing of clothes, this includes educating the public on simple repairs.</li> <li>A number of consultees state the need for initiatives and incentives for reuse. This includes promoting and normalising reusable and refillable options and implementing reasonable pricing to make these options accessible to all.</li> <li>A need for more reuse services and facilities, for example allowing the public to take items from centres which can be repaired or reused, there is then an option to sell these items on.</li> <li>Support should be given to charity shops who promote reuse and repair.</li> <li>CAS should have representatives on site to determine if an item is fit for reuse or repair.</li> <li>Implementing refill stations across the country to promote the reuse of reusable drinking bottles and reusable coffee cups.</li> <li>Incentives should be provided to shops which provide a 'container refill' charged by weight.</li> <li>Concerns were raised regarding the cost to repair products and it is often cheaper to replace than repair. Therefore, second hand markets should be encouraged.</li> <li>The need for a 'right to repair' law, similar to those imposed on phone manufacturers in USA might reduce waste in Ireland.</li> <li>A need for promoting infrastructure in the local vicinity allowing residents to know what repair and reuse infrastructure is available in an area.</li> <li>A need for WEEE repair services with a focus on spare part manufacturing from the suppliers.</li> <li>The need for repurposing old toys for reuse to avoid disposal.</li> </ul>	Responses from the general public made a range of comments on reuse/repair Infrastructure including the need for public and school visits to repair/reuse infrastructure facilities, the incorporation of repair into school curriculums with workshops and classes, the need for craft centres in the community, reuse and repair of textiles and WEEE, the need for initiatives and incentives for reuse, refill practice in retail and the need for a 'right to repair' law. These comments are currently either directly addressed or supported within the policies and actions for this focus area or within the Plan (for example, the 'right to repair' is addressed under Focus Area 3).



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FA12 Reuse/Repair Infrastructure Submissions - General Themes Raised		Amendments to the Plan
Comments from the Local Government Sector	There have been no submissions from the Local Government Sector in relation to FA12 but specific issues with policies and actions are noted below.	Comments made are noted and taken into consideration.
Comments from External Organisations	<p>The <b>Labour Party</b> recommended the development of a National Recycling and Repair Company.</p> <p>The <b>Rediscovery Centre</b> made a number of observations on training and skills development in the Reuse/Repair sector as follows:</p> <ul style="list-style-type: none"> <li>• A coordinated approach and roadmap for developing skills across all levels to facilitate the growth of reuse and repair is required, engaging with reuse and repair practitioners delivering these skills and the Department of Further and Higher Education.</li> <li>• Social enterprises should be recognised and supported through any roadmap for the crucial role played in delivering circular economy skills, taking into account recommendations from numerous studies above.</li> <li>• Finally, circular economy, SDGs and sustainability should be embedded in the school's curriculum.</li> </ul> <p>The EPA is leading on the formation of a National Reuse and Repair Partnership which should be encouraged to meet to set targets for reuse and repair.</p> <p>The EPA noted that the Circular Economy Programme are currently preparing a guidance document on reuse to provide clarity through examples on the types of direct reuse (prevention) activities which don't require an authorisation compared to preparation for reuse activities which are a treatment activity requiring an authorisation. It is recommended that the EPA are identified leading on the preparation of the technical guidance with the LGS leading on the training aspect identified.</p>	<p>The policies and actions for this focus area were generally welcomed with positive submissions from organisational respondents. Where specific details were provided these are noted and will be used to update the information contained within the Plan where appropriate.</p>

Volume II Part C: Focus Areas		
FA12 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP12.1	<ul style="list-style-type: none"> <li>• The <b>EPA</b> noted that FA12 needs to reflect the role of the EPA in driving the circular economy and the role of the National Reuse and Repair Partnership and it is recommended that the policies and actions in FA12 are reviewed to clarify whether preparation for reuse is the more appropriate activity being referred to (rather than reuse and repair).</li> <li>• <b>CIWM Ireland</b> have noted that technical, regulatory and financial support will be essential in promoting and growing prevention and preparation for reuse initiatives in line with the Plan's ambition.</li> <li>• <b>WEEE Ireland</b> commented that actions to tackle the lack of expertise and training in the repair community need to be addressed to ensure high-quality repairs using genuine parts, tools, and training. The raising of standards through recognised qualifications could improve repair activities (also applicable to PA12.1).</li> <li>• <b>VOICE</b> noted the need for binding sectoral reuse targets as regulatory support for reuse. The suggestion of sectoral reuse targets are addressed in more detail under the National Targets.</li> </ul>	<p>Revision of TP12.1 required as follows: 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 <b>through the National Reuse and Repair Partnership.</b></p>

Volume II Part C: Focus Areas		
FA12 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP12.2	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> have noted that training will not be sufficient as support to driving growth in reuse and repair. Many practitioners in this sector are small scale and lack the capacity to engage in training due to a lack of operational support. Investment in infrastructure, operational support and support for reporting will be key in growing these activities.</li> <li>• <b>WEEE Ireland</b> commented that currently, the CESI project has delivered the first industry supported white goods repair technician training programme in Ireland and LLLB has given insights to the capacity for the management of long-life lithium batteries needed here (also applicable to PA12.2). Actions to tackle the lack of expertise and training in the repair community but these are addressed through TP12.2 and PA12.1.</li> </ul>	Comments made are noted and taken into consideration.
TP12.3	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> have noted that the definition of advanced pre-treatment is currently focused on pre-treatment to recycling and similar operations. However, investment and support for infrastructure that supports the collection, sorting, repair where necessary and onward sale of goods for reuse will also be required.</li> </ul>	As noted by CIWM Ireland, there is no policy or action that expressly states support for investment in infrastructure, operations and reporting for the reuse/repair sector and it is recommended that a suitable policy or action wording is provided to resolve this gap. It is proposed to revise this policy as follows: Support the development of viable <b>reuse/repair infrastructure and initiatives including</b> materials recovery or other advanced pre-treatment infrastructure that increases the circular potential of materials.
TP12.4	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> have noted that in addition to supporting secondary material markets, the support for secondary product markets is also essential in driving growth in prevention (reuse, repair) and preparation for reuse.</li> <li>• <b>WEEE Ireland</b> commented that as indicated by Digital Europe, a market driven approach to the price outside the legal guarantee has to be applied (also applicable to PA12.4).</li> </ul>	Based on the feedback from CIWM Ireland it is recommended to revise the wording of TP12.4 as follows: Encourage the development of circular activities which stimulate and support viable secondary material markets and <b>secondary product markets</b> in the construction, industrial and bioeconomy sectors.

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FA12 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP12.5	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> have noted that insurance and liability are key barriers to both professional and community repair and require urgent attention.</li> <li>• <b>WEEE Ireland</b> commented that there is a varied amount of information about repair services in Ireland, depending on the brand/distributor involved, but there are no guidelines for documenting in a standardised manner the repair activities (also applicable to PA12.5).</li> </ul>	Comments made are noted and taken into consideration.

FA12 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA12.1	<ul style="list-style-type: none"> <li>• The EPA welcomes partnership working as identified in TP12.1. The EPA considers that the National Reuse and Repair Partnership which is an action for delivery under the Circular Economy Programme will play a key role in this area. The Local Government Sector and DECC are represented on the membership of this developing partnership initiative. It is therefore recommended to include the EPA and DECC as responsible organisations.</li> <li>• CIWM Ireland have noted that operational support and investment would be a greater priority than training in supporting the reuse and repair sector.</li> </ul>	Comments made are noted and taken into consideration.
PA12.2	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> have commented on reuse and repair at CAS. A wider scope of products should be accepted at the 10 designated CAS. Consideration should also be given to supporting the development of onsite reuse and repair activities e.g., retail.</li> </ul>	Comments made are noted and taken into consideration.

FA12 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA12.3	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> have commented on collection services for repair. If this relates to preparation for reuse, it will be important to identify and overcome barriers to preparation for reuse in Ireland and ensure any necessary authorisations do not create further barriers to this activity.</li> <li>• <b>VOICE</b> noted it would support the inclusion of a date of 2025 for completion of this pilot.</li> <li>• <b>VOICE</b> suggested assigning delivery dates for this pilot which is a valid comment. Typically, these actions are not assigned a temporal delivery but are assigned as 'priority' indicating early delivery in the annual work plans for Years 1 and 2 of the implementation period. As such, no further time assignments are applied to actions within the Plan.</li> </ul>	Comments made are noted and taken into consideration.
PA12.4	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> have noted that as per TP12.4, support for secondary product markets is essential in driving growth in prevention (reuse, repair) and preparation for reuse.</li> </ul>	Comments made are noted and taken into consideration.
PA12.5	<p>The <b>EPA</b> noted that it may be better to consider this as two separate actions:</p> <ul style="list-style-type: none"> <li>• One on the most appropriate consenting regime for reuse and repair infrastructure (for example an initial action may be timely to review the class of activities under the waste management facility and permit regs to assess whether different activities need to be included especially in the reuse and repair space)</li> <li>• A separate action on the collection of reuse and repair data should be investigated.</li> </ul> <p>The EPA leads on the formation of the National Reuse and Repair Partnership. The partnership will serve as a vehicle for addressing barriers to reuse and repair and will engage with relevant stakeholders to drive the sector forward. Both of the topics identified in TP12.5/PA12.5 fall within the scope of the partnership. EPA guidance on reuse will be available in later 2023 so should assist with delivery of this action. Reference could be made in this re-worded action to the EPA guidance.</p> <p><b>CIWM Ireland</b> have noted that in PA12.3, it will be essential that any authorisation regimes for reuse and repair do not create further barriers to this activity.</p>	Based on the feedback from the EPA it is recommended to revise the wording of PA12.5 as follows: Investigate the appropriate authorisation regime for reuse and repair activities to facilitate the capture of reuse and repair data.
PA12.6	The <b>EPA</b> recommended the addition of PA12.6.	The EPA recommended that PA12.6 is introduced as follows: <b>Collaborate with the EPA through the National Reuse and Repair Partnership to facilitate the capture of reuse and repair data.</b>

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FA13 Recycling Infrastructure Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• A number of consultees expressed the need for more education on recycling for all ages to reduce the amount of possibly recyclable materials being placed in the wrong bin, promoting source segregation.</li> <li>• Consultees want more communication between recycling facilities in their vicinity to clearly state what is accepted for recycling and if collection services are available.</li> <li>• There is a need to unify recycling segregation bins country-wide, this includes using the colour bins and labelling. Recycling symbols should be clear, and bins should display the corresponding symbols to minimise potential confusion.</li> <li>• A need to minimise recyclable material being exported, products branded as recyclable, should be recyclable in Ireland.</li> <li>• A need for incentives to encourage recycling at an individual and community level.</li> <li>• A need for workplaces to encourage recycling. Where general waste bins are provided in workplaces, so should a recycling bin.</li> <li>• Consultees have also expressed an interest at more diverse stations including bring banks for plastic bottles and paper. There is also a concern at the amount of bring banks across the country and the slow rate that their bottle banks are being emptied.</li> <li>• A need for more recycling facilities that can be accessed without a car (for example, on foot, by bike and by public transport).</li> <li>• A number of consultees have expressed their concerns on the cost of recycling facilities, often stating it should be more accessible and affordable. Consultees mentioned the cost of accessing different sites and how this varies across the country.</li> <li>• A need for frequent inspections of recycling facilities to ensure the correct methods are being enforced.</li> <li>• A need for more versatile recycling, materials mentioned specifically by consultees include construction and demolition materials, WEEE, paint, foil, metals and window frames.</li> </ul>	The general public expressed the need for more education on recycling including more communication between recycling facilities, the need to make recycling bins more consistent nationally, the need for more indigenous and less export of recyclable materials, incentives for greater recycling in commercial/ household settings and greater enforcement. These are wide ranging themes across behaviour change, capacity and regulation and each of these elements is addressed within the draft Plan and no revisions to the policies and actions proposed are required.



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FA13 Recycling Infrastructure Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• One consultee stated that the mywaste.ie database is not extensive enough, a second addressed the need for more online information on how items can be recycled, and where.</li> <li>• Staff at recycling facilities should have a good knowledge of the facility to provide assistance to the public.</li> <li>• A need for recycling bins in public settings, specifically to target plastic bottles being disposed.</li> <li>• There is a need for more accessibility for closed loop recycling for farm plastics, silage wrap and sheeting products.</li> <li>• A need for correct storage of recyclable material at facilities, it has been noted that cardboard recycling has been left uncovered in the rain at a facility in Munster.</li> <li>• Incentivising waste management companies to provide additional segregated collections/ deposits for plastic products.</li> <li>• A need for investment in government support of domestic recycling facilities (reprocessing and remanufacturing facilities rather than just collection and sorting facilities).</li> </ul>	
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>• Donegal County Council have expressed concerns regarding the cost of recycling bulky items through the CAS network.</li> <li>• Internal comments from the Local Government Sector seeks to ensure that annual returns are validated to identify deficits.</li> </ul>	Comments made are noted and taken into consideration.

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FA13 Recycling Infrastructure Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<ul style="list-style-type: none"> <li>• <b>EarthAct</b> have recommended a guidance document should be provided to households to allow householders to understand the proper destination of particular types of waste intended for general waste, recycling or refuse bins and show how percentages of each type of bin are recycled, and what percentages of each are recycled at home or abroad.</li> <li>• The <b>IFPA</b> recommends that the State should further incentivise domestic recycling, reprocessing, and remanufacturing.</li> <li>• <b>Hydrogen Utopia and Powerhouse Energy Group Plc</b> have noted that a chemical recycling process should be considered in Ireland for packaging, plastic and textile waste streams.</li> <li>• <b>ACE Ireland</b> noted that there should be support provided for research and development of new and emerging recycling technologies including fostering a competitive recycling landscape to make Ireland a leading country on plastic recycling for emerging technologies such as pyrolysis.</li> <li>• <b>Stoneybatter Sustainability Coalition</b> have expressed the need to build robust Indigenous recycling infrastructure, moving away from exporting waste.</li> <li>• The <b>IWMA</b> noted that there should be support for metal and WEEE recycling facilities.</li> <li>• A need to address that recycling materials incurs no cost to the environment as it requires significant energy consumption, therefore, reduction and reuse/repair should still be encouraged in accordance with the Waste Hierarchy.</li> <li>• <b>Cré</b> noted that in Ireland there are currently no regulations which place restrictions on the level of contamination permitted in the biowaste stream or that can be accepted by organic waste recycling facilities.</li> </ul>	Organisational submissions follow similar themes on behaviour change, capacity and regulation but more targeted submissions on policies and actions are generally supportive of the policy position presented or provide additional information with no policy or action revisions required.

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FA13 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP13.1	<ul style="list-style-type: none"> <li>• <b>CEWEP</b> supports this Target Policy.</li> <li>• <b>WEEE Ireland</b> noted there will always be a need for recycling and treatment capacity for WEEE and waste batteries. WEEE Ireland has supported the development of EN 50625 accredited infrastructure in Ireland and recommends that this strategy is fully adopted, and further indigenous facilities developed (also applicable to TP13.2).</li> </ul>	The submission received is noted but does not revise the wording of this policy.
TP13.2	<b>CEWEP</b> supports this Target Policy.	The submission received is noted but does not revise the wording of this policy.
TP13.3	<b>CIWM Ireland</b> agrees with this Target Policy.	The submission received is noted but does not revise the wording of this policy.
TP13.4	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> believes approved quality assurance of materials from AD and Composting is essential to maximising the circular potential of outputs along with continuous sample monitoring.</li> <li>• <b>Cré</b> noted that there is a broad welcome for this policy and Cré have already developed a Blueprint for Biowaste which contains all the necessary tools and policy recommendations to meet the desired outcome.</li> </ul>	The submission received is noted but does not revise the wording of this policy.
TP13.5	<b>Cré</b> welcomes this policy, but it is somewhat concerned by conflicting statements in the Plan. It states there is no need for additional capacity within the State, it also states that 'there are opportunities to develop a more diverse range of indigenous waste treatment capacity options.'	The submission received is noted but does not revise the wording of this policy.

FA13 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA13.2	<ul style="list-style-type: none"> <li>• The <b>EPA</b> recommend that this action should be led by Industry.</li> <li>• <b>CIWM Ireland</b> noted that materials from AD and Composting requires standardisation and continuous sampling owing to the variability of feedstock and the presence of heavy metals, which can cause material concerns. It is widely used in cement manufacture and road building. End of Waste criteria would be needed to standardise end product contaminants/constituents for use, as issues have arisen from heavy metals within the material.</li> <li>• <b>CEWEP</b> supports this priority action and intends to engage with the EPA and LGS to achieve by-product/end-of waste-status and identify routes to market for bottom ash aggregates in line with circular economy principles.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

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FA13 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA13.2	<ul style="list-style-type: none"> <li>• The <b>EPA</b> recommend that this action should be led by Industry.</li> <li>• <b>CIWM Ireland</b> noted that materials from AD and Composting requires standardisation and continuous sampling owing to the variability of feedstock and the presence of heavy metals, which can cause material concerns. It is widely used in cement manufacture and road building. End of Waste criteria would be needed to standardise end product contaminants/constituents for use, as issues have arisen from heavy metals within the material.</li> <li>• <b>CEWEP</b> supports this priority action and intends to engage with the EPA and LGS to achieve by-product/end-of waste-status and identify routes to market for bottom ash aggregates in line with circular economy principles.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA13.4	<ul style="list-style-type: none"> <li>• The <b>EPA</b> noted that the Circular Economy Programme in cooperation with other EPA sections, LGS and industry and contribute to the development and implementation of an evaluation process; a reporting/recording system to capture and update the results of the evaluations; and an agenda for improvements of processes.</li> <li>• <b>CEWEP</b> supports this Priority Action in principle which will result in higher recycling rates.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA13.5	<ul style="list-style-type: none"> <li>• <b>CIWM Ireland</b> agrees with this Priority Action but is of the opinion that the NWCPO needs additional staffing resources.</li> <li>• Internal comments from the Local Government Sector seek to ensure that annual returns are validated to identify deficits.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

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FA14 Recovery Infrastructure Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• A need for education on incineration as a method of recovery to make incineration more palatable to public.</li> <li>• The Plan should consider allowing small communities to incinerate waste which can provide heat and hot water to areas.</li> <li>• Consultees recommended a waste recovery levy similar to the landfill levy.</li> <li>• One consultee requested that all residual waste is to be incinerated to divert it from landfill.</li> <li>• One consultee requested research into the potential to use material currently being exported for energy recovery.</li> <li>• The need for research in to the potential for district heating scheme from incineration.</li> <li>• The need to avoid incineration where repair, reuse or recycling can be undertaken, it was noted by a consultee that their local centre has incinerated mattresses in the past.</li> </ul>	<p>Like other infrastructure focus areas, the general public responses included the need for more education on waste to energy plants. Other comments included the need for a recovery levy (already mandated) and the need for this Plan to ensure that waste to energy should not be prioritised over higher tier options such as reuse, recycling. These comments reflect the policy base within the draft Plan and no revisions are required.</p> <p>One response suggested that the Plan should allow small communities to incinerate waste for heat/energy but this is subject to regulation and planning and the Plan is restricted to supporting additional thermal capacity in general. Similarly, one respondent suggested the need for the Plan to ensure diversion of all waste from landfill to waste to energy but this is not possible given the current lack of thermal treatment capacity but this gap is addressed in the Plan.</p>
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>• Internal comments from the Local Government Sector seeks to set a circularity goal for the output from different types of facilities (other than energy recovery facilities).</li> </ul>	Comments made are noted and taken into consideration.

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FA14 Recovery Infrastructure Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<ul style="list-style-type: none"> <li>• The <b>Regional Assemblies</b>, among others, note the need to develop a bioeconomy in Ireland including the development of regenerative practices and utilisation of organic waste streams. Research into how biowaste could be utilised in the recovery industry to produce bio-based material and/or energy.</li> <li>• <b>Powerhouse Energy Group</b> expressed the need for energy recovery from waste systems in Ireland.</li> <li>• The <b>Labour Party</b> recommended a waste recovery levy similar to the landfill levy.</li> <li>• The <b>IWMA</b> welcomes and supports the work of DECC in creating new legislation to allow partial reviews of EPA licences and a more efficient approvals process whereby the planning and licensing processes can progress in parallel rather than in line.</li> </ul>	Submissions for organisations were generally supportive of the policies and actions in the draft Plan. The EPA suggested an amendment to PA14.2 to provide some clarity on the scope and meaning of the action and this has been actioned.
FA14 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP14.1	<ul style="list-style-type: none"> <li>• <b>CEWEP</b> supports this targeted policy in principle but believe it should not be mandatory. It will ensure potentially recyclable material and high calorific waste is removed from waste-to-energy residual waste feedstock. Care must be taken to ensure this does not undermine source segregation, the most effective method of separating recyclable material from residual waste and high quality recycling; and that the outputs from such pre-treatment, such as trommelled fines, are treated in line with the waste hierarchy.</li> </ul>	Comments made are noted and taken into consideration.
TP14.2	<ul style="list-style-type: none"> <li>• <b>Savills</b> (on behalf of Encyclis) raised concerns that an upper limit of 300,000 tonnes per annum may be considered as a maximum cap by decision makers in future applications.</li> <li>• <b>IWMA</b> welcomed TP14.2 (also TP11.2) in relation to supporting the provision of 200,000-300,000 t/a of additional dedicated thermal recovery capacity for the treatment of non-hazardous residual wastes nationally, to ensure there is adequate active thermal treatment capacity.</li> <li>• <b>CIWM</b> Ireland have noted that the previous iteration of Plans in 2015 recognised the need for an additional EfW capacity of 300,000 tonnes per annum at that time which hasn't been developed. In the interim, the Census shows a population of 5.1 million people and a reliance on export of waste out of the State.</li> <li>• <b>CEWEP</b> supports this targeted policy and welcome the distinction provided for dedicated thermal treatment capacity.</li> </ul>	A number of respondents have made observations on the 200,000-300,000 tonnes range specified TP14.2 for additional thermal treatment capacity. Some cite this range as too prescriptive and may act as a barrier to development. However, this range has been devised to help resolve the current capacity shortfall within the State (as calculated for this Plan) but without acting as a barrier to prevention and/or the development of higher tier treatment options such as reuse, repair and recycling. It is not recommended to alter the higher cap in the range presented at 300,000 tonnes within the current policy wording.



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FA14 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP14.5	<ul style="list-style-type: none"> <li>The <b>IWMA</b> is supportive of TP14.5 / PA13.2.</li> <li><b>CIWM Ireland</b> agrees with this Target Policy.</li> </ul>	Comments made are noted and taken into consideration.
TP14.6	A gap was identified in this Focus Area in relation to the bioeconomy. Therefore, a new Priority Action is recommended.	The new TP14.6 is added to resolve the bioeconomy gap as follows: <b>Support the development of circular bioeconomy infrastructure and initiatives that align with the policies of this Plan and the National Bioeconomy Action Plan 2023-2025.</b>

FA14 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA14.1	The <b>EPA</b> exercises an independent statutory role in its enforcement of EPA authorisations; nothing in the Plan can interfere with that independent statutory role.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA14.2	<ul style="list-style-type: none"> <li>The <b>EPA</b> note that it is not clear what is envisaged by this action.</li> <li>Internal comments from the Local Government Sector seeks to set a circularity goal for the output from different types of facilities (other than energy recovery facilities). They note that this PA does not match up with the corresponding Targeted Policy (TP14.2), which deals with the provision of additional thermal recovery capacity.</li> </ul>	The EPA note that this action needs clarity and a suggested rewording is presented. PA Revised as follows: Set a circularity <b>criteria</b> goal for the output from biological treatment facilities and for soil and other construction and demolition waste streams.
PA14.3	<ul style="list-style-type: none"> <li>The <b>EPA</b> exercises an independent statutory role in its enforcement of EPA authorisations; nothing in the Plan can interfere with that independent statutory role.</li> <li><b>CEWEP</b> supports PA14.3. High calorific material such as plastic which is suitable for recycling or recovery by co-incineration should be diverted from dedicated waste-to-energy facilities, in order to free up treatment capacity for non-recyclable waste.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA14.5	<ul style="list-style-type: none"> <li>The <b>EPA</b> exercises an independent statutory role in its enforcement of EPA authorisations; nothing in the Plan can interfere with that independent statutory role.</li> <li><b>CEWEP</b> supports this targeted policy and intends to engage with the EPA and local authorities on PA13.2 to optimise the circularity of bottom ash. However, bottom ash will require the provision of alternative capacity in the meantime.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

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FA15 Disposal Infrastructure Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>Several respondents have highlighted the need for financial implications for the creation of products that are likely to end in disposal to landfill. One recommendation stated that landfill charges should be paid for at POS and no charges to consumer, other than collection.</li> <li>Neighbourhood collection points were recommended to be established across the country at no extra cost to the public.</li> <li>Consultees have noted the need for education on disposal infrastructure. Recommendations include public education and school trips to sites to demonstrate the scale of waste and dumps to show unsustainability of consumerism.</li> <li>The following items were specifically mentioned as being wasteful as these often end up in landfill; water meters in the ground; electronic computers for voting; medical equipment ventilators; universities changing décor; government departments rebranding; the Komori printer and government leaflets.</li> <li>Plans to address disposable nappies would be a huge benefit. One consultee recommended a subscription service for laundering of nappy inserts. The consultee also addressed the need for a convenient alternative option to reusable nappies.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change.
Comments from the Local Government Sector	There have been no submissions from the Local Government Sector in relation to FA15 but specific issues with policies and actions are noted below.	
Comments from External Organisations	<ul style="list-style-type: none"> <li>The <b>IWMA</b> suggests that the best way to provide that capacity is through existing operational facilities, such as landfills. It was recommended that the Plan promotes the provision of contingency capacity, as the temporary or permanent loss of one large facility could have a severe impact on waste management in Ireland. The temporary loss of a large transfer station in 2021 due to a fire, led to the use of emergency measures to handle diverted wastes, so this is a real and continuous risk that must be addressed in the Plan.</li> </ul>	Comments on this focus area from organisations were generally supportive. Comments made are noted and taken into consideration.

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FA15 Submissions Specific Issues - Targeted Policies		Revisions to Targeted Policies
TP15.1	<ul style="list-style-type: none"> <li>• <b>CEWEP</b> supports these Targeted Policies in principle, however the use of existing permitted facilities should be considered before opening unused capacity or developing new facilities for contingency scenarios. Also, although landfill is the least favoured treatment option in the waste hierarchy, it does have the flexibility to deal with fluctuations in annual treatment capacity which may result for example from calamity / contingency scenarios. A clear definition of what qualifies as contingency capacity and a mechanism and/or set of rules setting out how contingency capacity is to be invoked and withdrawn is required to ensure such capacity is used appropriately in line with the waste hierarchy (also applicable to TP15.2).</li> </ul>	The submission received is noted but does not revise the wording of this policy.
TP15.2	<ul style="list-style-type: none"> <li>• The <b>EPA</b> welcomes the inclusion in the Plan to deliver a national waste contingency facility. It is recommended the scope of such a facility includes the acceptance of hazardous waste for disposal and storage of non-hazardous wastes prior to recovery.</li> <li>• <b>CIWM</b> Ireland believes contingency is required, there is thermal contingency with excess capacity in cement kilns, again the argument is if it is built it will be fed and as such it is limiting the provision of circular alternatives.</li> </ul>	Comments made are noted and taken into consideration.

FA14 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA15.1	<b>CIWM Ireland</b> agrees with the principle of this Target Policy.	Comments made are noted and taken into consideration.
PA15.2	<b>CIWM Ireland</b> disagrees with this Priority Action. CIWM Ireland queries how this can be a priority action before report has been prepared, consulted on and published.	Comments made are noted and taken into consideration.
PA15.4	<b>CEWEP</b> believe valuable void space is being expired by disposal of recoverable material such as (bio)stabilised fines. This is another reason why the landfill levy exemption must be removed for such waste. CEWEP further submit that trammelled and bio-dried waste remain subject to the landfill levy exemption until September 2025.	Based on internal RWMPO discussions the following revision is recommended: <del>Work</del> Collaborate with the landfill operators to ensure that remaining void space is utilised primarily for residual municipal waste <b>has priority to the available licensed landfill void capacity over and above other waste streams.</b>
PA15.6	The <b>EPA</b> exercises an independent statutory role in its enforcement of EPA authorisations; nothing in the Plan can interfere with that independent statutory role.	Comments made are noted and taken into consideration.

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FA16 Hazardous Waste Infrastructure Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<ul style="list-style-type: none"> <li>• One consultee addresses the need for a domestic waste disposal for chemical products and mentioned paints, specifically lacquer and oil-based paint which requires solvents, thinners etc, which cannot be disposed of down the drain. Currently the disposal method includes waiting for paints to evaporate off and an alternative should be sought.</li> <li>• A need for testing of per- and poly-fluoroalkylated substances at hazardous waste facilities.</li> <li>• Suggestions for increased charges on comingled wastes would help to drive segregation on-site. This suggestion is based on the observation that construction wastes can be comingled with hazardous wastes and recoverable materials. Therefore, enforcement and auditing at hazardous facilities is recommended.</li> </ul>	There were limited comments on this focus area but comments from the general public include the need for a domestic waste disposal for chemical products (e.g. paints), the need for testing of per- and poly-fluoroalkylated substances at hazardous waste facilities and the need for increased charges on comingled wastes. The comments raised on this focus area are valid and welcome and will be used to inform the finalisation of the Plan but there are no changes proposed for the targeted policies and priority actions presented for this focus area.
Comments from the Local Government Sector	There have been no submissions from the Local Government Sector in relation to FA16.	No comments from the Local Government Sector.
Comments from External Organisations	The <b>EPA</b> comment that the Plan recognises and supports the need for nationally important waste infrastructure and echoes recommendations and key actions identified in the NHWMP 2021-2027, which aim to strengthen systemic resilience for management of hazardous waste in Ireland (Recommendation 4) and an examination of the economic viability of managing various waste streams in Ireland.	Organisational comments were from the EPA who referenced the National Hazardous Waste Management Plan and the EPA's role in leading on this focus area. This comment does not warrant and change in the draft Plan policies and actions.

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FA16 Submissions Specific Issues - Priority Actions		Revisions to Priority Actions
PA16.1	The EPA will take a leading role with collaboration from LGS.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA16.3	The EPA will lead and collaborate with LGS on this PA.	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.
PA16.4	<ul style="list-style-type: none"> <li>The EPA exercises an independent statutory role in its enforcement of EPA authorisations; nothing in the Plan can interfere with that independent statutory role.</li> <li>Internal comments from the Local Government Sector noted that PA16.4 is an action listed for the EPA, and states "liaise with the EPA on the enforcement of hazardous waste licences to avoid disruptions to waste treatment". They note it does not make sense for the EPA to be actioned to liaise with itself and suggest that this action be listed against the Local Government Sector.</li> </ul>	Comments made are noted and taken into consideration but there is no proposed change to this Priority Action.

Volume III Part A: Regulatory, Infrastructure and Climate Impact		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	There have been no submissions from the public on Volume III Part A.	There are limited comments on Part A from the general public.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector provided a detailed breakdown of the responsibilities assigned for each KD and provided commentary on additional bodies that may also have a role in delivery.</li> <li>Internal comments from the Local Government Sector noted, regarding Table 1.3, that bye laws for commercial waste have not been introduced across all LGS. Bye laws for commercial waste will need to be developed and delivered across the state to include incentivised charging (this is also applicable to KD4). Furthermore, it was noted that the figures presented under the Expansion of the Brown Bin Collection Network measure does not account for apartment waste.</li> <li>Internal comments from the Local Government Sector noted that the EPA does national waste characterisation studies, aggregated across a number of waste collectors/regions, and this is only done once every few years. This is considered too broad a tool to assess performance on a more granular level that can be followed up with targeted enforcement. They recommend that the primary burden should be placed on waste collectors via conditions attached to their waste collection permit.</li> </ul>	Comments made are noted and taken into consideration.
Comments from External Organisations	<p>The <b>EPA</b> recommends the Plan places greater emphasis on the role of industry, including the provision of improved source segregation services to households and businesses to improve capture of materials, lowering of contamination levels and the delivery of higher recycling rates.</p> <p>The <b>EPA</b> recommends the following edit to text in Volume III is suggested, linking the Food Waste Prevention Roadmap to the national policy statement, Waste Action Plan for a Circular Economy:</p> <p>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 and a Waste Action Plan for a Circular Economy. 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.</p>	<p>The additional narrative on the interventions in Table 1.1, as suggested by the EPA, will be included in the final Plan.</p> <p>The construction waste projections in Section 1.2 will be updated to reflect the implementation date for the national decision for greenfield soil and stone as noted by the EPA.</p>



Volume III Part A: Regulatory, Infrastructure and Climate Impact		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	<p>In terms of construction waste projections, the EPA note the following:</p> <ul style="list-style-type: none"> <li>Recommend that the projection is moved forward to 2024 as national decision for greenfield soil and stone is not anticipated to be available for uptake until Q1 2024.</li> <li>It should be noted that the national decision on end-of-waste will see the recovery of aggregates from soil and stone.</li> </ul> <p>The <b>Regional Assemblies</b> highlight a number of Key Deliverables (KD) where these assemblies have a role and should be identified as key stakeholders.</p> <p>The <b>Chartered Institution of Wastes Management (CIWM)</b> provided a detailed breakdown of the responsibilities assigned for each KD and provided commentary on additional bodies that may also have a role in delivery.</p> <p><b>CEWEP</b> has noted the following in relation to Volume III Part A:</p> <ul style="list-style-type: none"> <li>Table 1.3 - CEWEP suggests this text be updated to reflect progress made on the increase in the Landfill Levy. For example, the government is currently legislating for an increase in the Landfill Levy and has confirmed a 1st September implementation date.</li> <li>Table 2.1 - CEWEP suggests this section be updated and amended to include the fact that a final planning decision is awaited from An Bord Pleanála and a licence is awaited from the EPA and the figure of 216,000 tonnes rMSW capacity be updated to a maximum capacity of 240,000 tonnes as set out in the planning and licence applications.</li> <li>Table 2.2 - CEWEP suggest that 'Ringsend (Recovery)' be amended to 'Dublin Waste to Energy' as referenced throughout the Plan.</li> </ul> <p>The <b>CCPC</b> continues to hold the view that the establishment of an economic regulator would be the optimal solution to address the issues present in the household waste collection market. However, in light of the rationalised framework contained in the draft NWMPCE, and in recognition of the current policy context for the sector, the CCPC suggests that the remaining functions and powers of an economic regulator could instead be delivered through the structures it proposes.</p>	<p>The additional narrative on the interventions in Table 1.1, as suggested by the EPA, will be included in the final Plan.</p> <p>The construction waste projections in Section 1.2 will be updated to reflect the implementation date for the national decision for greenfield soil and stone as noted by the EPA.</p>

Volume III Part A: Regulatory, Infrastructure and Climate Impact		
Submissions - Specific Issues - Key Deliverables		Revisions to Key Deliverables
KD4	Internal comments from the Local Government Sector noted that this KD commits the WERLGS and LGS to more rigorous enforcement of the byelaws on the segregation, storage and presentation of municipal waste. They state that this key deliverable should be reworded to the Local Authorities through guidance and technical support from WERLA will rigorously enforce.	Comments made are noted and taken into consideration.
KD6	Internal comments from the Local Government Sector noted that the wording of KD6 is updated as it is not a requirement of the LGS, and it is legislative change by the DECC that is required to enable the enforcement of the roll out of the brown bin nationally. It was also noted that it should be changed from 'food waste' to 'food and biowaste'.	Comments made are noted and taken into consideration.
KD9	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector noted that industry have an important role in committing to these guidelines.</li> <li>The EPA noted that the national decision for recycled aggregates allows for the recovery of aggregates from soil and stone and that it is recommended that prediction figures both for by-product soil and stone and end-of-waste recycled aggregates account for this.</li> </ul>	Comments made are noted and taken into consideration.
KD11	Internal comments from the Local Government Sector questioned who is responsible for establishing the group referenced and noted that this responsibility needs to be clearly assigned. They noted that the responsibility for establishing a group such as this needs to be clearly assigned and should lie with the Local Government Sector.	Comments made are noted and taken into consideration.
KD12	Internal comments from the Local Government Sector question how CASs will cater for reuse if they accept the material as waste in the first place.	Comments made are noted and taken into consideration.
KD14	Internal comments from the Local Government Sector stated that KD14 deals with landfill capacity for rMSW, they go on to say that there is no deliverable for the unauthorised ROI waste within the state and outside the state.	Comments made are noted and taken into consideration.
KD15	Internal comments from the Local Government Sector noted that KD15 is the only one listed for C&D waste, but it only deals with soil recovery facilities.	Comments made are noted and taken into consideration.
KD20	Internal comments from the Local Government Sector noted that KD20 looks for entities to use the "Guidance on Siting Waste Management Facilities" (developed by the RWMPO), but this guidance document is not yet published and available on the internet as a stand-alone document. This is published as Appendix 9 of the Plan.	Comments made are noted and taken into consideration.

Volume III Part B: Organisation, Engagement and Resources		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	There have been no submissions from the public on Volume III Part B.	The general public made no comment on Part B of Volume C.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>Internal comments from the Local Government Sector provided a detailed breakdown of the responsibilities assigned for each KD and provided commentary on additional bodies that may also have a role in delivery.</li> <li>Internal comments from the Local Government Sector noted that in Figure 4.2 (and Figure 5.1) the Local Government Sector alone should not have responsibility for the Focus Areas, further to this, the LGS noted it should be clearer that EPA and DECC also have shared responsibility in the delivery of the Focus Areas.</li> <li>Regarding Section 4.3.2 External Organisational Arrangements, Existing Arrangements, internal comments from the Local Government Sector noted that The NWESC does not have a coordinating function of waste enforcement activities. The coordination of waste enforcement at a regional level is under the oversight of the CCMA and laterally, the LGS Management Group.</li> <li>Regarding Section 6.3.3 Regulation internal comments from the Local Government Sector stated that this section states that in 2022 the LGS had 33 resources and that this is not correct. Volume I of the Plan (i.e., current resources) actually gave the LGS resource as being 10 FTRs.</li> </ul>	While no submissions were raised requiring significant revisions of Part B of Volume III, this aspect of the Plan will be revised as required to account for changes made elsewhere in the Plan on foot of the consultation responses.
Comments from External Organisations	<p>The EPA made a number of recommendations in relation to the governance of the Plan as follows:</p> <ul style="list-style-type: none"> <li>The EPA recommends that the organisational arrangements proposed in the Plan recognise existing national governance structures for enforcement activities to ensure current arrangements are preserved and maintained.</li> <li>The EPA calls for a partnership agreement to be established between the EPA and the LGS to provide clarity to roles in respect of circular economy activities and to define an effective way of working together.</li> <li>The EPA recommends that the Plan references the statutory role of the EPA in relation to waste prevention. The EPA will work collaboratively with local authorities to deliver the waste prevention activities in the Plan, to ensure that these activities are impactful, coordinated and focused on priority areas and materials.</li> </ul>	No revisions to the text of Chapter 4 is required.

Volume III Part B: Organisation, Engagement and Resources		
Submissions - General Themes		Amendments to the Plan
Comments from the Local Government Sector	<p>The EPA recommends that the final Plan identifies the lead organisation responsible for delivery of each action and deliverable to ensure clear ownership to support co-ordination of activities between delivery organisations.</p> <ul style="list-style-type: none"> <li>Under the innovation demonstration pillar of the Circular Economy Programme the EPA proposes to relaunch the Local Authority Prevention Network as the Circular Economy Network. This is to ensure a good alignment with the Circular Economy Programme and local authority needs and circular economy priorities.</li> </ul> <p>The EPA recommends the Plan places greater emphasis on the role of industry, including the provision of improved source segregation services to households and businesses to improve capture of materials, lowering of contamination levels and the delivery of higher recycling rates.</p> <ul style="list-style-type: none"> <li>The <b>Regional Assemblies</b> highlight a number of Key Deliverables (KD) where these assemblies have a role and should be identified as key stakeholders.</li> <li>The <b>Chartered Institution of Wastes Management (CIWM)</b> provided a detailed breakdown of the responsibilities assigned for each KD and provided commentary on additional bodies that may also have a role in delivery.</li> <li>The <b>CCPC</b> welcomes the proposed establishment of the National Coordinating Group for Waste and the Circular Economy (NCGWCE), as it is anticipated to lead to greater coordination between the three main structures responsible for waste management policy, the Department of Environment Climate and Communications (DECC), the Environmental Protection Agency (EPA) and the Local Government Sector. We further welcome the establishment of the Local Authority Waste Programme Coordinating Group (LAWPCG), which will play key policy roles for the Local Government Sector.</li> </ul>	No revisions to the text of Chapter 4 is required.

Volume III Part B: Organisation, Engagement and Resources		
Submissions - General Themes		Amendments to the Plan
Comments from External Organisations	<p>The <b>CCPC</b> recommendation on governance, delivery models and consumer protection may be summarised as follows:</p> <ul style="list-style-type: none"> <li>• The <b>LAWPCG</b> should consider which structures would be most appropriate for the delivery of market design reviews, as well as the appropriate structures to make recommendations around economic licensing, and the process to make final decisions.</li> <li>• A system of economic licensing should be introduced with the power to grant an exclusive licence or licences in specified geographic areas.</li> <li>• Provisions should be made to enable the inclusion of allocation of routes as a possible condition attached to a waste collection permit.</li> <li>• A relevant structure should have the power to set price controls where appropriate.</li> <li>• A relevant structure should have the power to levy fines for specific breaches in order to ensure maximum compliance with the regulatory framework.</li> <li>• Legislative changes may be required and should be considered in order to ensure that different service delivery models can be put in place.</li> <li>• If tendering is considered within market design, best practices should be used in the tender process to ensure fairness and consistency.</li> <li>• Tenders and licencing can be designed to address potential service disruption, by building the certainty of having a supplier of last resort into a tendering process.</li> <li>• The <b>LAWPCG</b> and the <b>NCGWCE</b> should consider whether customer services standards should be developed for the sector. One such standard includes whether customers should be provided with the right to request human intervention when consumers interact with the service provider through fully automated online interfaces.</li> <li>• The <b>LAWPCG</b> should consider whether consumers who are vulnerable should have guaranteed access to a specific standards of waste collection service, and what these standards should be.</li> <li>• <b>Customer Charters</b> should include a section outlining customer service commitments and policy provisions for vulnerable consumers.</li> </ul> <p>CCPC have been consistent in suggesting the approach to economic licencing and price control to DECC and similarly now to Local Government. This approach would require a significant shake-up of the market and there is no current provision in national policy for any adjustment in line with CCPC submission.</p>	No revisions to the text of Chapter 4 is required.

Volume III Part A: Regulatory, Infrastructure and Climate Impact		
Submissions - Specific Issues - Key Deliverables		Revisions to Key Deliverables
KD31	Internal comments from the Local Government Sector question whether this KD is already being undertaken through the historic landfill remediation programme.	Comments made are noted and taken into consideration.
KD33	Internal comments from the Local Government Sector noted that the enforcement funding model will be undertaken by the CCMA with input through relevant stakeholders and that communication with DoS and Senior Management on any revisions is crucial.	Comments made are noted and taken into consideration.

Volume III Part C: Implementation, Monitoring and Oversight		
Submissions - General Themes		Amendments to the Plan
Comments from the General Public	There have been no submissions from the public on Volume III Part C.	No comments made by the public.
Comments from the Local Government Sector	<ul style="list-style-type: none"> <li>• Internal comments from the Local Government Sector provided a detailed breakdown of the responsibilities assigned for each KD and provided commentary on additional bodies that may also have a role in delivery.</li> <li>• Table 8.1 outlines the metrics that will be used to track progress on various aspects of the Plan. For contamination levels in dry recyclables and organics, there is a focus on aggregated mass balance calculations at the treatment facilities, however internal comments from the Local Government Sector think this is too broad and operator specific assessments should be undertaken to allow progress to be assessed on a location basis (e.g., County by County) or by individual waste collector.</li> <li>• Internal comments from the Local Government Sector noted that in relation to C&amp;D waste, the only metric proposed in Table 8.1 is the total amount of C&amp;D waste. This does not take account of regional variability, which would be important to monitor against regional capacity availability.</li> </ul>	There were limited submissions of detail on this part of the Plan with only minor comments on text and assignment of responsibility for Key Deliverables.
Comments from External Organisations	<ul style="list-style-type: none"> <li>• The <b>Regional Assemblies</b> highlight a number of Key Deliverables (KD) where these assemblies have a role and should be identified as key stakeholders.</li> <li>• The <b>Chartered Institution of Wastes Management (CIWM)</b> provided a detailed breakdown of the responsibilities assigned for each KD and provided commentary on additional bodies that may also have a role in delivery.</li> <li>• The <b>CCPC</b> welcomes the proposed establishment of the National Coordinating Group for Waste and the Circular Economy (NCGWCE).</li> </ul>	There were limited submissions of detail on this part of the Plan with only minor comments on text and assignment of responsibility for Key Deliverables.



Volume III Part C: Implementation, Monitoring and Oversight		
Submissions - Specific Issues - Key Deliverables		Revisions to Key Deliverables
KD49	Internal comments from the Local Government Sector noted that the RWMPOs will produce the annual report as opposed to the LGS, but the LGS is used throughout the Plan as the umbrella group for the Local Government Sector.	Comments made are noted and taken into consideration.



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Local Government Ireland