An Taisce
The National Trust for Ireland

20131219-13-RWP

Regional Waste Coordinator
Southern Region Waste
Management Office
Limerick County Council
Dooradoyle
Co Limerick

19.12.13

Re: Preparation of Regional Waste Plans

Dear Sir/Madam,

Thank you for referring the above to An Taisce for comment.

An Taisce welcomes the commencement of a preparation of Regional Waste Plans and would like to make the following comments which we request the local authority take into consideration in the finalisation and adoption of the plan.

We would also request that the local authority make An Taisce known of any further consultation periods regarding the making of this plan and issue An Taisce with notification of any future proposed amendments to the draft plan and notification of the final adopted plan.

Yours sincerely,

Tomás Bradley
Planning & Environmental Policy Officer
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Preparation of Regional Waste Plans

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The National Trust for Ireland

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1.0 Introduction and Preliminary Comments

One of the key issues addressed in the Government's most recent waste management policy document, *A Resource Opportunity – Waste Management Policy in Ireland* (July 2012), is waste management planning; and the policy reminds us that waste management planning has been a statutory function of local authorities since 1996. Under Section 22 of the Waste Management Act, 1996, local authorities were given the discretion to come together to discharge their waste management planning functions in groups, as a result of which ten Regional Waste Management Plans were drawn up and implemented.

This shared service approach appears to have worked reasonably well, even though we consider that most of the waste management plans were lacking in any real incentives to eliminate waste, to reduce waste, or to encourage repair, re-use and re-cycling. To date, we have a situation where almost all of Ireland's recyclable materials are exported, with very little re-processing or recycling carried out in the country.

Nevertheless, the implementation of the regional waste management system could be said to have brought about an improvement, primarily as a result of European Union Directives and a strengthening of the Environmental Protection Agency's role in waste prevention and management.

The existence of waste management regions, within which each region was expected to become self sufficient in waste-related infrastructure, so that transportation of waste across regional boundaries would be minimized, did not appeal to the waste management industry, members of which felt strongly that waste should be transported to wherever it could be disposed of more economically. In most cases, this approach resulted in waste being trucked long distances across the country to landfill sites where the gate fees were less than at other more proximate sites.

As a result of this lobbying, the boundaries of the waste management regions became more "permeable", especially in Leinster, where large quantities of urban and industrial wastes from the expanding Dublin metropolitan area found their final resting place in Counties Meath, Wicklow, Kildare, Louth, Offaly, Cavan and Westmeath. Some wastes may even have travelled to counties further away; and there is every likelihood that wastes generated in other cities such as Cork and Limerick were transported to other counties for landfilling.

The recent policy document, A *Resource Opportunity – Waste Management Policy in Ireland*, appears to have taken this move a step further, and is proposing a reduction in the number of waste regions from 10 to 3 (section 3.4, page 28). This is described as the result of "*local authorities undertaking their waste management planning responsibilities, guided by the programme of reform of local government structures*", but perhaps it could be more correctly stated as the result of a policy set by the Department of Environment, Community and Local Government.

In response to this policy change, a limited form of public consultation has been advertised, in which written submissions may be made to the Regional Waste Coordinator in the relevant Local Authority.

2.0 Size of the Proposed Waste Management Area

The advertised "Notice of Intention to Commence Preparation of Regional Waste Plans" states that such submissions may be made "*with respect to the administrative areas of the Local Authorities*". While An Taisce does not normally concern itself with details of administrative boundaries, we feel that in this case the creation of such an extremely large waste management area would copper-fasten the practice of transporting waste as far as possible from the major urban areas. While acknowledging that it is very difficult for an urban area to deal with its own wastes within its own boundaries, it is our view that imposing urban areas waste on rural communities is not the most appropriate solution. In the absence of any real incentives to encourage waste reduction, elimination, repair, re-use and recycling or composting of

organic materials, landfilling still remains one of the most favoured options taken by the waste industry in Ireland.

It is therefore our submission that the new and expanded waste management region, which would come under the control of the appropriate Local Authority, would result in that Local Authority having far too much power in comparison with all of the other Local Authorities within the same region.

3.0 Waste Management Policy

An Taisce works closely with another environmental NGO, **Zero Waste Alliance Ireland** (ZWAI), which has developed an integrated policy and strategy to address the country's waste management problems, An Taisce would suggest the following policy initiatives. Our belief and approach is that waste management must not rely on landfills, incineration, so-called "waste-to-energy" solutions, or any other "end-of-pipe" approaches. Future waste management must recognise that:

- While landfilling may have to remain an acceptable means of dealing in the short term with locally generated residual quantities of non-recyclable and non-compostable municipal solid wastes, the only long-term sustainable solution is to completely eliminate the production of materials which cannot be re-used, recycled or naturally biodegraded;
- Instead of organising systems that efficiently dispose of or recycle our wastes, we can and must learn from nature to design systems of production and consumption that have little or no waste to begin with -- this will result not only in a saving of scarce resources, but will re-adjust our relationship to the earth's material assets from a linear to a cyclical one, enhancing our ability to live comfortably while reducing environmental damage;
- The only long-term sustainable solution to municipal, industrial and agricultural waste management is to eliminate the production of materials which are toxic and which cannot be naturally biodegraded, re-used, recycled or re-processed as secondary raw materials for other productive industrial or commercial uses;
- "**Zero Waste**" is an integrated realistic whole-system approach to addressing the problem of society's unsustainable resource flows – it includes waste elimination at source through product design and producer responsibility, together with waste reduction strategies further down the supply chain such as cleaner production, product dismantling, recycling, re-use and composting

Practical steps towards achieving the goal of Zero Waste should focus on solutions being put into practice in many countries, including examples of clean industrial production, waste elimination, successful recycling and "zero waste" practices worldwide. Achieving this goal does not require complex or advanced technology solutions, only the realisation and full understanding that:

- Waste is made by mixing a variety of discarded materials; therefore segregation at source is an essential pre-requisite to sustainable waste management;
- It is essential that waste is considered as a community resource, and not as a bulk commodity to be removed by disposal to landfill or by incineration;
- Communities should be encouraged to handle their discarded materials responsibly;
- Communities cannot resolve the waste problem alone and should not be forced to clean up after irresponsible industries;
- Countries and communities faced with discarded materials and objects they cannot reuse, recycle or compost have to demand that industry stops producing them; total recycling is not approachable without industry's help;
- Sustainable waste management or "Zero Waste" combines community practices such as reuse, repair, recycling, toxic removal and composting, with industrial practices such as eliminating toxics and re-designing packaging and products for the environmental and ecological demands of the 21st century;

- Sustainable waste management brings together the need to develop sustainable communities and sustainable industry and business; and,
- Sustainable waste management or "Zero Waste" combines ethical practice with a solid economic vision, both for local communities and for local and national businesses. On the one hand, it creates local jobs and small scale enterprises, which collect and process secondary materials into new products, and on the other hand, it offers major companies a way of increasing their efficiency, thereby reducing their demands on virgin materials as well as their waste disposal costs.

Appropriate fiscal (taxation), economic and social incentives are the key to the creation of the necessary structural and behavioural changes, and they should be introduced without delay. Such incentives have been recommended to the Irish Government by the European Commission, the Organisation for Economic Cooperation and Development (OECD) and by the Economic and Social Research Institute (ESRI) – yet they have not been implemented, and the reasons for this failure of approach must be examined, and the barriers to implementation removed.

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