An Taisce
The National Trust for Ireland

20140128-DOE-ELVS

Waste Policy & Resource Efficiency Section,
Department of Environment, Community and Local Government,
Newtown Road,
Wexford,
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prireview@environ.ie

28.01.14

Re: Consultation on the report on End of Life Vehicles (ELVs) in the Producer Responsibility Initiative sector in Ireland

Sir/Madam,

An Taisce welcomes this consultation period on End of Life Vehicles (ELVs) in the Producer Responsibility Initiative sector in Ireland and the opportunity to make a submission with regard to same.

Please acknowledge receipt of this submission and advise us further of any forthcoming consultations in relation to the above report.

Yours sincerely,



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Consultation on the report on End of Life Vehicles (ELVs) in the Producer Responsibility Initiative sector in Ireland



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1.0 Introduction

An Taisce appreciates that existing Producer Responsibility Initiatives has transformed waste management in Ireland, most notably in waste types such as farm plastics and electrical equipment. 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; the policy reasserts that waste management planning has been a statutory function of local authorities since 1996. Most waste management plans are lacking in any real incentives to eliminate waste, to reduce waste, or to encourage repair, re-use and re-cycling. To date, a situation has arisen where almost all of Ireland's recyclable materials are exported, with very little re-processing. The requirement for local authorities to understand Producer Responsibility Initiatives and incorporate them into their waste management planning is crucial. Nevertheless, the benefit of existing Producer Responsibility Initiatives in Ireland, however limited, has brought about an improvement in how waste is managed. As a result of European Union Directives and a strengthening of the Environmental Protection Agency's role in waste prevention and management, it is considered End of Life Vehicles can be successful tailored into a Producer Responsibility Initiatives mechanism.

An Taisce commends to Minister and his officials for progressing with this initiative.

2.0 Zero Waste

The approach of An Taisce to waste management is that must it 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. 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.

Any Producer Responsibility Initiative should contain policy for the producer in clean industrial production, waste elimination, successful recycling and "zero waste" practices. Achieving this goal does not require complex or advanced technology solutions, only the realisation and full understanding will result in ethical practice and a sustainable economic product, both for local communities and for local and national businesses. Zero waste will, on the one hand, create 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.

3.0 Regulating and Removing Scrap Yards

With support for the producer in achieving more sustainable industrial practices such as eliminating toxics and re-designing packaging and products for the environmental and ecological demands, the outstanding question arises, as to whether the user will disposed of End of Life Vehicles appropriately and legally? Communities cannot resolve the waste problem alone and should not be forced to clean up after irresponsible industries and producers.

Any Producer Responsibility Initiative will have to be independently monitored and not allowed to be manipulated by the motor industry. The Producer Responsibility Initiative should include regulation to de-incentivise stock piling and illegal scrap yards for End of Life Vehicles.

4.0 Supporting Sustainable Re-Use

Any Producer Responsibility Initiative should support local sustainable re-use of End of Life Vehicles. For example, suitable alternatives to exporting our waste in Ireland would be a collection company established to take End of Life Vehicles out of the waste circuit, recycle them and then turn them into a new, broad range of related products.