



- National Waste Prevention Programme –

Prevention Plan 2009-2012

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1. Introduction

The Minister for the Environment, Heritage and Local Government established the National Waste Prevention Programme (NWPP) in April 2004 in accordance with the policy document *Preventing and Recycling Waste – Delivering Change*. The Environmental Protection Agency published an outline framework plan for the Programme to cover the period 2004-2008. Many of the initiatives proposed in the plan have since been implemented, as resources were made available. Other new initiatives have also commenced which were not originally envisaged. Four annual reports have been published detailing the progress made with the range of projects initiated. A dedicated website was established at www.nwpp.ie where further information on the programme may be viewed.

With the passage of time, the original work plan needed to be replaced by a new statement of intent for the National Waste Prevention Programme for 2009 onwards. To this end, a draft of this document was presented to the National Waste Prevention Committee in October 2008 for consultation and feedback. Two submissions were received and a summary of the issues raised in the submissions is provided in Appendix B.

Following this consultation, the EPA has published this new *Prevention Plan 2009-2012*. This document is presented as a framework statement of intent for work to be completed on the Prevention Programme for the four-year period to 2012, subject to resources being available.

With the financial difficulties now being faced by Irish businesses, public sector organisations and households generally in 2009, the time is ripe for the promotion of resource efficient methods of conducting business and personal activities. Prevention is about *people* taking steps to reduce their business and personal costs by adopting more resource efficient ways of operating their day-to-day activities. A key part of this Prevention Plan is the marketing and promotion of prevention opportunities available to all organisations and householders. The widespread adoption of resource efficiency has potential to reduce waste arisings including hazardous and biodegradable wastes, and to reduce pressure on water and energy resources. This would in turn contribute significantly to the Climate Change and the Sustainable Production & Consumption agendas.

2. Waste Framework Directive – a new legal basis for this Plan

The EU agreed a revised Waste Framework Directive in 2008 (2008/98/EC). Article 29 of the revised Directive obliges Member States to establish national waste prevention programmes by 2013. Article 30 requires that these plans be revised at least once every 6 years. Ireland has had a National Waste Prevention Programme in place since 2004, and this *Prevention Plan 2009-2012* represents the first revision of the framework for the national programme. It seeks to build on the success and lessons-learned from implementing a range of practical prevention projects. This *Prevention Plan 2009-2012* will also seek to have regard to the requirements of Article 29 of the revised Waste Framework Directive as outlined in the table below.

<p align="center">Text of Directive 2008/98/EC on Waste</p> <p align="center"><i>Article 29</i> Waste prevention programmes</p>	<p align="center">Current or Planned Position</p>
<p>1. Member States shall establish, in accordance with Articles 1 and 4, waste prevention programmes not later than [five years after the date of entry into force of the Directive].</p>	<p>National Waste Prevention Programme was established in April 2004.</p>
<p>Such programmes shall be integrated either into the waste management plans provided for in <i>Article 28</i> or into other environmental policy programmes, as appropriate, or shall function as separate programmes. If any such programme is integrated into the waste management plan or into other programmes, the waste prevention measures shall be clearly identified.</p>	<p>Regional and local waste management plans are obliged to have separate sections on waste prevention.</p> <p>While the National Waste Prevention Programme functions as a distinct programme, it seeks to integrate with regional and local waste management plans with regard to their prevention elements (e.g. Local Authority Prevention Demonstration/Network projects). The National Hazardous Waste Management Plan functions in a similar manner.</p>
<p>2. The programmes provided for in paragraph 1 shall set out the waste prevention objectives. Member States shall describe the existing prevention measures and evaluate the usefulness of the examples of measures indicated in Annex IV or other appropriate measures.</p> <p>The aim of such objectives and measures shall be to break the link between economic growth and the environmental impacts associated with the generation of waste.</p>	<p>Objectives are set out in section 4 of this <i>Prevention Plan</i>.</p> <p>Existing prevention measures are described in section 6.</p> <p>Consideration of the Annex IV examples is described in Appendix A.</p> <p>These are included in the objectives of the National Waste Prevention Programme and this <i>Prevention Plan</i>.</p>

<p>3. Member States shall determine appropriate specific qualitative or quantitative benchmarks for waste prevention measures adopted in order to monitor and assess the progress of the measures and may determine specific qualitative or quantitative targets and indicators, other than those referred to in paragraph 4, for the same purpose.</p>	<p>All projects undertaken in the National Waste Prevention Programme have built-in metrics. Indicators are quantitative where possible and qualitative where appropriate (see section 8.4).</p> <p>The National Strategy on Biodegradable Waste contains targets for the prevention of biodegradable municipal waste.</p> <p>The Green Hospitality Award scheme provides sector-wide international benchmarks for hotels' resource efficiency.</p>
<p>4. Indicators for waste prevention measures may be adopted in accordance with the procedure referred to in <i>Article 39</i> (3).</p>	<p>These indicators are at EU Commission level.</p>
<p>5. The Commission shall <i>create a system for sharing information on best practice regarding waste prevention and</i> develop guidelines in order to assist the Member States in the preparation of the Programmes.</p>	<p>The EPA, through the National Waste Prevention Programme, will co-operate with any information-sharing initiatives commenced by the Commission.</p> <p>A paper was delivered to the European Roundtable on Sustainable Consumption and Production, Berlin in September 2008. Subject: LAPD Programme.</p>

3. Challenges to waste prevention

Waste management at end-of-pipe has developed greatly in Ireland in the last two decades particularly in relation to separate collection of recyclables/packaging and improved landfill standards. However, waste prevention is a different challenge to developing improved services by the waste management industry. Rather, it can only be achieved by a complete change in attitudes and behaviour by *people* in business, industry, other organisations, and householders as consumers or at leisure.

There is strong policy commitment to waste prevention both at EU and national policy level. The National Waste Prevention Programme has been running since 2004 and has been funded to date from the Environment Fund. From experience with a range of projects, it is clear that there is an ongoing challenge to explain the practical application of waste prevention and resource efficiency ideas to public and private sector organisations. This means, in other words, for them to move beyond recycling to progress further up the waste hierarchy. Promises of potential cost savings from no-or-

low cost resource efficiency or waste prevention measures need to be clearly demonstrated with case studies from peer organisations before they will be adopted more generally.

Other challenges to waste prevention can be summarised as follows:

- A consumer society focused on convenience, fashion, obsolescence and high turnover of goods;
- A perceived lack of alternative approaches to waste avoidance, generation and management;
- available products lack durability or repairability (tendency to dump & replace rather than repair & reuse);
- higher disposable incomes;
- poor understanding of prevention and the connection between excess consumption and waste in society – at official, organisational and individual levels;
- lack of recent tradition of reuse, repair or resourcefulness generally;
- need to implement prevention best practice widely in society.

In general, there is a common failure to see value in a product or commodity that is being discarded, where it might feasibly be repaired, reused directly or put to another use. However, there are important changes in this field in very recent times, with the development of websites dedicated to selling or giving away of unwanted and used goods (e.g. e-Bay and www.dublinwaste.ie among other examples). There are also apparent changes in consumer behaviour brought on by recent economic uncertainty.

4. Objectives of the National Waste Prevention Programme

The revised Waste Framework Directive 2008, Article 29 states:

“[Prevention] programmes ... shall set out the waste prevention objectives. The aim of such objectives and [prevention] measures shall be to break the link between economic growth and the environmental impacts associated with the generation of waste.”

Taking into account the detailed project summaries provided below, the objectives of the *Prevention Plan 2009-2012* are to:

- implement a suite of projects that, individually and combined, are designed to overcome the barriers to waste prevention and, in the organisations and individuals engaged with:
 - increase awareness of the environmental impact of excess consumption and waste;
 - reduce the use of material, water and energy resources in order to reduce waste generation;
 - increase the diversion of biodegradable municipal waste from landfill; and

- reduce the use of hazardous substances and the generation of hazardous waste;
- take the principles of resource efficiency and waste prevention, as set out in national and European policy documents and legislation, into account in the design and implementation of all projects under the National Waste Prevention Programme's¹ operational heading;
- bring about measurable improvements in resource efficiency and waste generation at organisational and, where participation is high and indicators exist, sectoral levels;
- generate case studies to actively demonstrate the opportunities and cost savings possible from resource efficiency and waste prevention; and
- disseminate the principles of resource efficiency and waste prevention throughout the public and private sectors to encourage uptake of best practice in relation to internal practices and influence on the public and clients.

5. What is prevention?

Since commencement of the National Waste Prevention Programme, the general understanding of what prevention actually is has broadened beyond just avoiding 'solid waste'. The concept of 'wastage' was introduced at an early stage – meaning, broadly, wasteful industrial production and consumption of goods and services, including transport and tourism. Consumption is increasing and to tackle the root cause and environmental impact of this trend, it is necessary to consider cleaner production practices, the wise use of resources, sustainable consumption and waste generation together.

The revised Waste Framework Directive includes the following definition of prevention:

"Prevention" means 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 life span of products;
- b) the adverse impacts of the generated waste on the environment and human health; or
- c) the content of harmful substances in materials and products.

The following definition of waste prevention is based on one originally proposed in an EPA research report prepared in 2003:

"Prevention is the elimination or reduction at source of material, water and energy consumption, waste arisings (solid, liquid, gaseous and heat) and harmful substances."

¹ Many projects may arguably not be "pure prevention" but involve the enforcement or implementation of a statutory obligation where the outcome results in prevention.

Thus any action that, for example, reduces the use of material resources, increases the efficiency of production/service processes, decreases water and energy consumption, or causes a reduction in the gross generation of waste (for disposal plus recycling) can be classified as waste prevention. In general, prevention may be achieved either by reducing the overall demand for goods and services, or by using less (or less harmful) resources to provide for reasonable needs. Prevention also seeks to reduce emissions, to reduce harmful substances in material streams and their dissipation, and to improve resource efficiency throughout the life cycle of a product or service. Such actions and activities are considered to be within the scope of the National Waste Prevention Programme² in terms of eligibility for support, advice, funding and targeting of initiatives.

These ideas, concepts and definitions have been adopted as part of the framework for the National Waste Prevention Programme. The waste hierarchy diagram in Figure 1, proposed in this format in 2003, provides a useful illustration of what is, and what isn't, waste prevention.

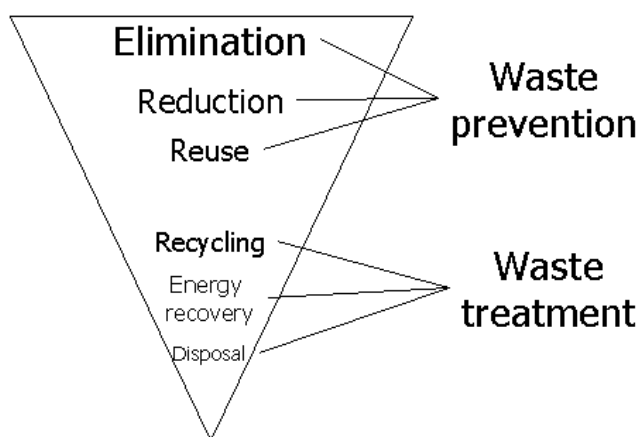


Figure 1 The waste hierarchy, highlighting the priority of prevention over waste generation and treatment

Figure 2 elaborates on this thinking by showing that preventive action should ideally be taken *before* waste is generated, not after.

² Sustainable Energy Ireland (SEI) have primary responsibility for promoting energy conservation and the sustainable use of energy and fuel resources. While the NWPP will provide general tips on energy issues when dealing with businesses and other organisations, large energy users and those whose primary issue is energy and fuel consumption will generally be referred to SEI for expert guidance.

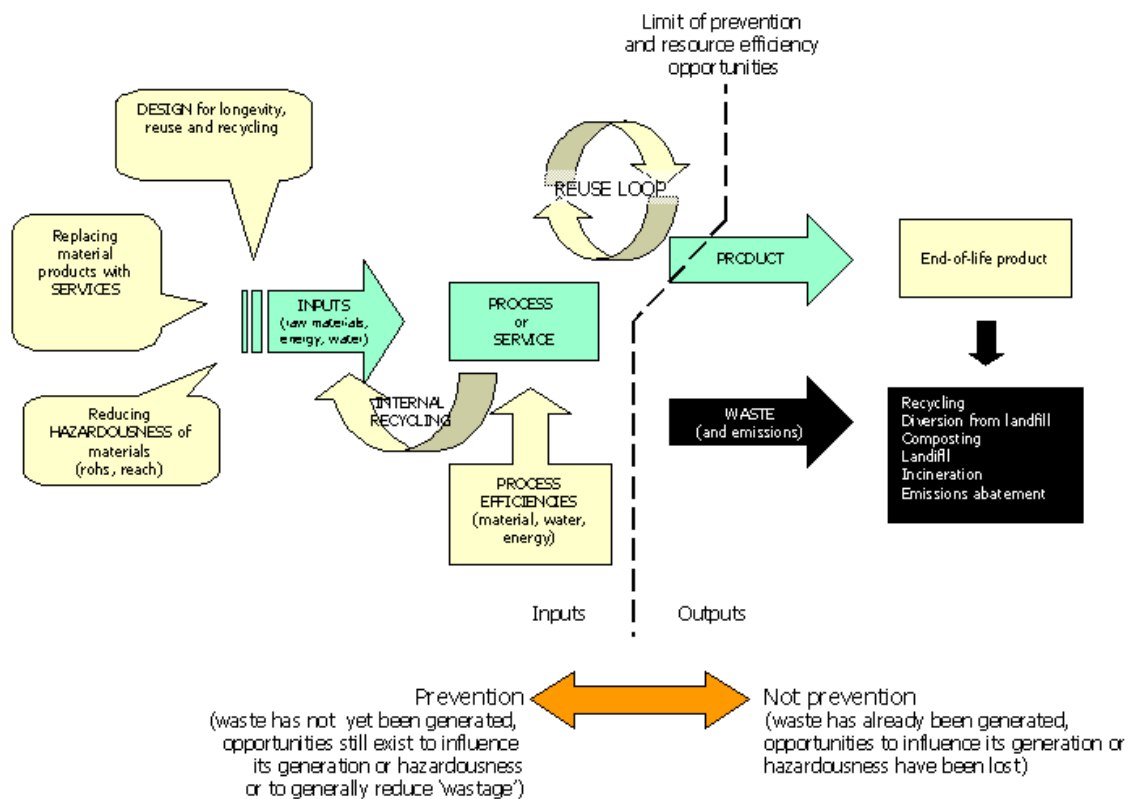


Figure 2 Illustration of the place of waste prevention in the general flow of materials

6. Existing prevention projects

6.1 EPA National Waste Prevention Programme – prevention projects

Local authority

The National Waste Prevention Programme's first major project was the Local Authority Prevention Demonstration (LAPD) Programme. Fourteen local authorities are now participating and have to date received €885,000 in grant aid to allow dedicated staff to work on local prevention projects. A wide range of projects are ongoing – some are looking at prevention in the local authority's own activities, others are working with local businesses and community groups to find ways of reducing waste and saving money. The Clean Technology Centre provides technical advice and assistance to the participating local authorities. An eight-day prevention-training course primarily for local authority staff is in its third iteration involving 28 participants in total. Participants on the course are expected to complete projects and exams and will receive a qualification upon completion. Quarterly network meetings are held with participating LAPD local authorities and this is contributing to the development of an active prevention network. A first annual conference was held in February 2008. Notable cost savings have been achieved or identified in many projects. Most notable however has been the obvious development of the participating local authority staff in their understanding of prevention, their ability to generate, implement and manage prevention programmes and their motivation to bring about change (See the LAPD Programme website at www.ctc-cork.ie/lapd/ or www.lapd.ie). A number

of participants appeared on Eco-eye TV programme explaining about a farm waste prevention booklet which they had published.

Business

The Green Business Initiative commenced in 2008 with two headline projects. First, a pilot for a new 'greenbusiness.ie' website and associated support services was launched. The waste audit tool (WAT) at the core of the website was initially developed by the Race Against Waste in 2006/7. A new water audit tool (WAVE) was developed in time for the pilot. An associated helpline and confidential expert on-site advisory service is also available via the website (See www.greenbusiness.ie). By early 2009, more than 100 businesses had signed up to the website.

Second, the 'Green Hospitality Awards' project commenced in January 2008. By early 2009 up to 200 hotels had signed up to this scheme and 80 had achieved their awards³. Participants are provided with expert advice and assistance towards achieving waste prevention and water, energy and resource conservation. Awards (bronze, silver, gold and platinum) are formally made to recognise their achievements confirmed by audits. (See www.ghaward.ie).

In 2007/8, the EPA agreed to 50% fund a Packaging Prevention Programme operated by Repak. Several projects are underway including a dedicated website, publication of case studies, a report on decision-making in packaging supply chains, a retail sector agreement and the development of a certified packaging prevention training course first rolled out in 2008. (See www.preventandsave.ie).

Community

Commencing in 2007, the EPA agreed to support An Taisce's Green Home Programme, an extension to the successful Green Schools Programme. The Green Home programme was piloted in several areas and is being expanded in 2009 to include up to 9,000 households. The programme now revolves around the website with householders invited to register and be provided with information on waste prevention, water conservation and energy use. A range of meetings with teachers, participating schools and feedback mechanisms are used to disseminate best prevention practice (See www.greenhome.ie).

Training

Considerable prevention training is ongoing and envisaged for the future. The first major prevention training course was that developed by IBEC in 2005 and supported by the National Waste Prevention Programme. As mentioned above, a local authority prevention training course is proving successful and a packaging prevention training course was piloted in 2008. Other training organisations have expressed interest in providing general prevention training courses.

Hazardous waste

A revised National Hazardous Waste Management Plan was published in 2008. Several recommendations for prevention initiatives will be implemented under the National Waste Prevention

³ This is a cumulative target. Under the "national contract", funded by the National Waste Prevention Programme, the contractors must meet a target of 150 participating hotels in 2008. Regional support provided by Cork local authorities, the Limerick Clare Kerry Regional Waste Management Office and Carlow Chamber all have other targets. However, the scheme is identical across the country.

Programme (see www.epa.ie/whatwedo/resource/hazardous/). A wide range of projects will be initiated by the EPA in relation to this plan, especially in the area of prevention and collection of hazardous waste. A prevention programme in the pharmachem sector is envisaged including promotion of Cleaner, Greener Production/HazRed prevention techniques. The three-year EU *Life*-funded Hazred programme came to a close in 2007. Seven Irish businesses participated in the programme learning to prevent and reduce hazardous waste generation. The outputs from this project will contribute to implementation of the National Hazardous Waste Management Plan, Green Hospitality Award and Green Business case studies (see www.hazred.org.uk).

Contact will be made with the HSE to further promote prevention in hospitals and the community. A Code of Practice and local authority network will be developed around the issue of hazardous waste collection at Civic Amenity Sites from households and small businesses. A national Guidance will be developed on vehicle servicing activities and best practice in managing and accounting for the hazardous wastes arising from these activities. Consultation will commence on developing an Accredited Inspection Contractor (AIC) scheme for this sector. A stakeholder consultation will be initiated into the issues around the collection and treatment of hazardous wastes. Studies will be commissioned on barriers to provision of domestic hazardous waste landfill and treatment of solvents.

The EPA maintains dedicated webpages on waste prevention that can be accessed through www.prevention.ie and www.nwpp.ie.

6.2 Other projects funded under the NWPP operational heading

Other resource use initiatives, projects and legislation that come under the operational heading of the National Waste Prevention Programme include:

- annual national waste report (and associated waste characterisation research)
- waste electrical and electronic equipment regulations enforcement
- batteries regulations enforcement
- restriction of hazardous substances in electrical and electronic equipment, batteries, paints, packaging and in End-of-Life Vehicle regulations enforcement
- polychlorinated biphenyls, preparation of inventory and management plan
- persistent organic pollutants regulation implementation and enforcement
- ozone-depleting substances regulations enforcement
- solvents and decorative paints regulations enforcement (in part)

All of these resource use/hazardous materials projects need to be maintained to fulfil the requirements of relevant binding EU Directives and national regulations. Each project contributes to resource efficiency and waste prevention by managing and avoiding the use and dispersion of

hazardous materials. Further information on these projects is provided in the programme annual reports (see www.nwpp.ie).

6.3 Local authorities and regional waste management groupings

There are ten Regional Waste Management Plans and each plan is required to include measures on waste prevention. Annual progress reports are required and activities on prevention/awareness/recycling have been reported in implementation reports published by several local authorities and regional offices.

All local authorities have appointed Environmental Awareness Officers. Two authorities have appointed Green Business Officers – Dun Laoghaire Rathdown County Council and Dublin City Council. The Limerick/Clare/Kerry Region has appointed a Regional Industrial Waste Minimisation Officer.

As noted above, there are 14 local authorities participating in the Local Authority Prevention Demonstration Programme.

6.4 Other public bodies

The Department of the Environment, Heritage and Local Government has appointed a contractor to implement a Market Development Programme. This Programme has the potential to yield considerable dividends in the increased domestic uptake of recycled materials, green public procurement and general improved resource efficiency.

Enterprise Ireland provides several programmes including support for indigenous businesses to develop environmental management systems and the development of “environmentally superior products”.

Sustainable Energy Ireland also operates supports for business with a focus on improving energy efficiency and the use of renewable sources of energy.

The “Power of One” and “change.ie” campaigns are focused on increasing awareness of climate change and changing energy consumption patterns.

The Global Action Plan is operated in Cork by the Cork Environmental Alliance and in Dublin, supported by Ballymun Regeneration Ltd.

The National Waste Prevention Programme seeks to develop synergistic relationships with each of these programmes in so far as they address resource efficiency and prevention generally.

6.5 Research

The EPA’s STRIVE (formerly ERTDI) programme provides considerable funding for environmental research including several headings relevant to resource efficiency and waste prevention. Outputs from the Cleaner, Greener Production Programme are being developed into national programmes including the Green Hospitality Awards, Macroom-E and green hospitals. Additionally, case studies

arising from this work are being used on an ongoing basis in the Green Business Initiatives. A range of new STRIVE research projects are already underway and several additional ones were approved in 2008.

7. Proposed prevention measures for the period 2009-2012

The most important thing for the next four years of the National Waste Prevention Programme is to maintain momentum on existing projects, to establish what is working and to build on success. It is also necessary to continue to devise new projects and approaches and to roll out new sectoral initiatives. However, the National Waste Prevention Programme has finite staffing and financial resources and this will necessarily impact on the scale, ambition and time required for projects to take effect. Given these constraints, the National Waste Prevention Programme will be implemented on the basis of project priority. The priority listing is provided in section 8 below.

The rest of section 7 outlines the proposed future approach to the prevention projects currently underway or proposed.

7.1 Local Authority Prevention Network (LAPN)

In local authorities, the expertise that has been built up in the LAPD Programme should continue to be utilised. A follow-up to the LAPD Programme is required to allow the existing trained staff to continue their good work and to open the door to all local authorities to participate in the National Waste Prevention Programme.

The proposed Local Authority Prevention Network is a successor to the LAPD, keeping the newly trained and experienced prevention officers at work in this field, and providing for the participation of new local authorities.

It is proposed that a 'supported network' of local authority staff will be formed. The network will have two key elements:

- (1) access to project-based grant-aid, to support projects and provide local authorities with the means to allocate staff to prevention projects; and
- (2) a network core, including website, to keep members informed, co-ordinate information sharing, and run training courses.

The network can also be developed into a mentor system, whereby experienced members could be asked to work with personnel in other organisations to help them to achieve waste prevention and resource efficiency.

It is proposed that a service indicator⁴ be devised and recommended for waste prevention in local authorities. Service indicators are published annually and are a possible way of focussing attention on prevention at the highest level in local authority management.

To further encourage interest at all levels in local authorities, an annual awards ceremony could be held (during the annual national conference) to recognise the achievements of the best local authority projects.

The potential benefits of providing the two elements (listed above) of the proposed LAPN are considerable – (1) a network of trained, motivated and professional prevention officers providing services and advice to local business and communities on waste prevention and environmental sustainability and (2) senior local authority management interested and engaged in waste prevention.

The EPA will seek to put the Local Authority Prevention Network in place, supporting an experienced cadre of prevention officers working in this field and increase the number of trained prevention officers. However this will require the commitment and active assistance of senior local authority management, as well as the prevention officers themselves.

Senior local authority commitment is necessary to ensure that prevention officers have the management support to effectively carry out their work in a true cross-cutting manner and to provide strategic direction to the network.

7.2 Green Business Initiative – greenbusiness.ie

The greenbusiness.ie website and associated support services were launched in 2008 in pilot mode to be followed by a formal launch in early 2009. The EPA will continue to develop and market greenbusiness.ie as a confidential prevention support service. The project will need to be adequately funded to ensure its continuity and efficacy in the long term. Several additional initiatives and services will be considered for greenbusiness.ie from 2009.

While initial uptake is good, if businesses cannot be persuaded to prevent waste on a voluntary basis, then alternative approaches such as General Binding Rules or an AIC scheme will be considered. Key performance indicators for 2009 have been developed to measure the uptake and usefulness of the website and support services.

7.3 Green Business Initiative – ‘Green Hospitality Awards’ project

By early 2009, almost 200 hotels had been signed up for this initiative and 80 had received awards for prevention. A new target has been set for 2009 with an expectation of up to 500 participants (from hotels and related sectors) by 2011. The largest establishments are being addressed first to ensure that the greatest possible impact is achieved in terms of avoided resource use and waste generation. The EPA will seek to maintain the project’s relevance and usefulness to this business sector. However,

⁴ Local authorities report annually against a series of service indicators that illustrate their achievements.

given its obvious success and demonstrated cost savings, the ability of participating businesses to contribute more to the cost of the programme will be kept under review, perhaps with the subsidy to individual businesses being gradually decreased. The scheme could alternatively be supported by an enforceable requirement for hotels, and other similar businesses in the hospitality sector, to comply with “general binding rules” for environmentally acceptable operations (i.e. proven cost/impact saving measures).

7.4 Green Business Initiative – Green Hospitality project expansion to other major food waste producing sectors

Biodegradable municipal waste prevention and diversion from landfill will be addressed in the National Waste Prevention Programme. The expansion of the hotels sectoral initiative to other major food waste producers such as restaurants, contract catering and hospitals will be evaluated and proposed by the EPA, with the objective of reducing food waste generation and diverting it from landfill. The gradual withdrawal of subsidy from hotels (see section 7.3) would allow for businesses from other hospitality sub-sectors to be recruited.

7.5 Green Business Initiative – Case studies implementation

In 2008, the EPA offered €2,000 for each case study received, however, only a small number of submissions were made. From 2009, active Green Business Initiative projects (greenbusiness.ie and Green Hospitality Award) and LAPN are likely to be the main source of prevention case studies. The EPA will actively pursue the preparation and dissemination of prevention case studies through these projects.

7.6 National Hazardous Waste Management Plan implementation

The National Hazardous Waste Management Plan (NHWMP) identifies six sectors⁵ (including households) where hazardous waste prevention efforts should be focused for the next five years (to 2012). Funding and resources will be required to implement projects in these sectors. Projects initiated under this heading will not necessarily focus solely on hazardous waste. The EPA will initiate a number of prevention projects during the period of the Plan as available resources allow. Scoping of projects will be done in consultation with relevant stakeholders.

The EPA will implement a range of other project commitments made in the NHWMP over the period of the Plan 2008-2012.

⁵ Pharmachem, publishing and printing, transport, agriculture, healthcare and households.

7.7 Eco-business programme (or eco-business 'network' programme)

An eco-business award programme is currently being piloted in County Cork with support from the Cleaner Greener Production Programme. A similar 'EcoProfit' scheme is operated in many cities and regions around the world and was pioneered in the Austrian city of Graz. These programmes are aimed at local support and interaction with small and medium sized businesses such as high street shops, suppliers and factories. This scale of business activity is best supported locally, through local authorities or other organisations.

Local authorities will be encouraged to operate eco-business programmes and the Local Authority Prevention Network (see section 7.1) is an obvious means of channelling funds. Should other organisations such as local chambers, enterprise boards, etc., wish to embark on such programmes, it is proposed that support through the National Waste Prevention Programme should be available. Transparent qualifying criteria would need to be developed.

The EPA will also, and particularly should the Local Authority Prevention Network fail to materialise, seek to support the formation and evolution of green business networks through out-sourcing to the private sector. There are several networking models (including eco-business award, Macroom-e, Supply Network Shannon, green mentoring project) whose objectives and methodologies merit further investigation as to cost effectiveness and results.

7.8 Food waste prevention / home composting / how-to-use of brown bins promotion project

In support of the National Biodegradable Waste Strategy and Circular WPPR 17/08, the EPA will commence a programme to enable local authorities to promote food waste prevention, home composting and the proper use of brown bins. The EPA will engage a third party to operate the programme on its behalf and on behalf of participating local authorities.

7.9 Prevention training courses

The National Waste Prevention Programme will continue to take primary responsibility for ensuring the local authority prevention training course is available and attractive. Means of making the course largely self-financing will be sought.

Training will continue to be a long-term need. The more focused and tailored the training, the better. Support will where possible be made available to other organisations that have developed or wish to develop prevention training courses.

7.10 Green Homes Programme

The Green Home Programme is being expanded by An Taisce with support from the National Waste Prevention Programme in 2009. This support will continue while funding allows and ongoing review confirms that prevention objectives are being achieved.

7.11 Packaging Prevention Programme

In 2007/8, the EPA provided 50% of the external costs of the packaging prevention programme operated by Repak. The source of funding for subsequent phases of the programme is the subject of ongoing review. Continued support will be made available to Repak while funding allows and ongoing review confirms that prevention objectives are being achieved.

7.12 Construction industry sectoral initiative

As the largest source of non-agricultural waste in the country (4.2 million tonnes of waste in 2007, not including soil and stones), it seems appropriate that efforts be made to reduce the generation of construction and demolition waste and ensure its recycling to the maximum possible extent. It is proposed that construction waste, other than soil and stones, be the main focus of the initiative. In 2008, the construction industry was requested by the Department of the Environment, Heritage and Local Government for its proposals on how to give the National Construction and Demolition Waste Council renewed relevance and to demonstrate commitment to waste prevention and recycling on the part of the industry. Any initiative involving the construction and demolition industries must have the backing and commitment of the sectoral representative bodies. The EPA will support any renewed commitment, agreement, and/or regulation made regarding the prevention, generation and management of construction and demolition waste.

7.13 Other sectors

Other organisations in the public and private sector have discussed their projects with the EPA to investigate the potential for support under the National Waste Prevention Programme. Several proposals may lead to new collaborations in 2009 and beyond. Such enquiries are evaluated on their technical merit, conformity with the principles of prevention and the objectives of the NWPP, likely costs and value for money.

The EPA will be pro-active as resources allow in prioritising and supporting other sectors and sectoral interests for engagement on prevention.

8. Implementation

8.1 Projects

The EPA will implement a series of measures under this *Prevention Plan 2009-2012* and the National Waste Prevention Programme generally. The EPA's Resource Use Unit has sixteen staff principally involved in work that is funded by the National Waste Prevention Programme and coming under its operational heading, as listed in section 6.2. Considerable additional capacity is out-sourced from the Unit. The Unit will plan to implement the projects listed below, in the order of priority presented, provided sufficient resources allow and stakeholder co-operation continues. The allocation of priority

reflects firstly, statutory resource-related obligations and secondarily, the potential impact and multiplier effect that can be achieved from the point of view of environmental protection.

The following is the proposed order of priority for projects to be addressed or implemented under the National Waste Prevention Programme as staffing and financial resources allow:

1. National waste report (and associated waste characterisation research)
2. Batteries regulations enforcement
3. Waste electrical and electronic equipment regulations enforcement
4. Restriction of hazardous substances in: electrical & electronic equipment, batteries, packaging, End-of-Life Vehicle and decorative paints regulations enforcement
5. Solvents and Decorative paints regulations enforcement (part)
6. Ozone-depleting substances regulations enforcement
7. Persistent organic pollutants regulation implementation and enforcement
8. Polychlorinated biphenyls, inventory and management plan
9. National Hazardous Waste Management Plan implementation and monitoring
10. Green business initiative – greenbusiness.ie
11. Green business initiative – Green Hospitality Award
12. Local authority prevention training course development and delivery
13. Local Authority Prevention Network (LAPN)
14. Green homes programme
15. Home composting promotion project
16. Green business initiative – major food waste producing sectors
17. Eco-business programme
18. Green business initiative – packaging prevention project (with Repak)
19. Other sectoral initiatives, including construction and demolition

8.2 Synergies with other EPA areas of responsibility

In developing the National Waste Prevention Programme, the existing statutory responsibilities of the EPA will be utilised to the best advantage. Some areas of co-operation are:

- ❑ Licensing – continued development of waste prevention and resource efficiency conditions in IPPC and waste licences;
- ❑ Enforcement – implementation and enforcement of those specific conditions relating to waste prevention and resource efficiency;

- Climate – recognising that reducing greenhouse gas emissions is an integral part of improved resource efficiency especially in relation to energy and biodegradable waste;
- Research – using the outputs of EPA-funded research projects (such as the Cleaner Greener Production Programme) to maximum effect through efficient and targeted dissemination of information. Using the EPA research programme to address information gaps and emerging research needs, where appropriate;
- Education – the EPA schools programme and Eco-eye television series will be used to good advantage to raise awareness and improve understanding of waste prevention and resource efficiency.

8.3 Synergies with other relevant bodies

Improvements in resource efficiency and waste prevention cannot be achieved by the Environmental Protection Agency alone. There are numerous other organisations not mentioned in section 7 that play an active role in promoting resource efficiency and waste prevention. The EPA will seek to continue to develop strong links with the following key organisations:

National Waste Prevention Committee

As the chair of the National Waste Prevention Committee, the EPA will seek to ensure that all members are fully aware of the full range of projects underway in the National Waste Prevention Programme. Members will be asked to contribute as necessary to the dissemination of information, to promote the Programme generally and provide sectoral commitments to initiatives on behalf of their stakeholder members.

Department of the Environment, Heritage and Local Government

As the body responsible for leading waste prevention policy and funding the National Waste Prevention Programme, it is important that the Department continues to be mindful of the benefits accruing from an active National Waste Prevention Programme in achieving national and European policy objectives and to the wider national economy and society.

Sustainable Energy Ireland (SEI)

Energy resource conservation must be considered as an integral part of waste prevention and resource efficiency programmes. SEI is the appropriate channel by which organisations, sectors and communities should progress the energy element of resource efficiency or waste prevention programmes. NWPP can help in this endeavour as well as contributing to resolving Ireland's Climate Change challenges.

Forfás, IDA Ireland and Enterprise Ireland

The enterprise policy and development agencies have established links with the wider business community in terms of providing advice and guidance on business development at all levels, from promoting foreign direct investment to assisting small indigenous businesses directly. The National

Waste Prevention Programme has established links with these organisations, and all are now represented on the National Waste Prevention Committee. There will be strong synergies between the Green Business Initiative in particular and the enterprise development agencies. NWPP is positioned to enable all businesses to become more competitive and will drive innovation and sustainability.

IBEC (and affiliates), ISME, Chambers of Commerce and other business representatives

The business representative organisations are closely involved with business communities at grass roots level and at national level. These representative bodies should be used to the best advantage of the National Waste Prevention Programme to raise awareness and improve understanding of waste prevention and resource efficiency thinking. Businesses can save substantially on costs and improve their profitability by applying common sense measures. Each of the above mentioned bodies, plus others such as farm representative bodies, are represented on the National Waste Prevention Committee.

8.4 Targets and indicators

Waste prevention is a challenge to achieve and to measure. Given its implementation at the micro (enterprise, household, individual) level, it is often difficult to see reductions in waste generation at the macro (county, regional, national) level. Prevention will primarily be measured at the enterprise/sector level, meaning that participating organisations will be asked (or obliged, depending on the project) to contribute statistics and indicators. They may be asked to measure waste generation, water and energy consumption and resource efficiency (all where relevant and depending on the project) before and after intervention and change. Data will be quantitative where possible and qualitative where appropriate. Available data will be verified as appropriate and aggregated sectorally or by other means to indicate:

- the amount of resources conserved (tonnes of material, cubic metres of water, kWh of energy) – as measured before and after intervention;
- the quantity of waste prevented (measured as tonnes of waste generated before and after intervention); and
- money saved (the euro difference in waste/water/energy costs before and after intervention or change).

Examples of other indicators include:

- cost of project and time-scale
- number of businesses contacted or participating;
- number of homes or communities contacted or participating;
- number of people who have completed prevention courses; and
- number of prevention officers operating in local authorities.

These indicators will be presented in the context of NWPP funds spent on projects or as a whole. However, quantitative indicators of this nature are only part of the story and cannot measure or represent all of the potential benefits of spending public money on waste prevention projects.

Early indications from the LAPD Programme (section 6.1) are that considerable amounts of material usage (and waste generation) have been avoided and costs saved as a direct result of the intervention of trained local authority prevention officers. What cannot be measured however is the extraordinary growth in expertise, capacity, understanding and motivation of these same local authority prevention officers. The multiplier effect of trained and motivated prevention officers influencing increasing numbers of people, organisations and businesses in their areas is not directly measurable (but may be indirectly measured by their keeping records of savings made at their "client" companies and householders)⁶.

Similarly, the Green Homes programme run by An Taisce involves the dissemination of information and the holding of meetings with groups of householders. Qualitative indicators in the form of questionnaire responses are used to measure individual families' progress towards more sustainable forms of living, but quantitative indicators are difficult to compile, or to rely on.

All available indicators, quantitative and qualitative, will be presented in the annual National Waste Report and in National Waste Prevention Programme annual reports.

9. Conclusion

Since 2004, the National Waste Prevention Programme has developed a portfolio of concrete projects each aimed at demonstrating waste prevention and resource efficiency to a target audience. Looking into the future, this development will continue, as more prevention networks are established and positive working relationships enhanced focussing on this issue. The key elements for continued success are:

- a recognition that prevention is primarily about people and their behaviour, and secondarily about applied science and engineering;
- an acknowledgement that working with people (at home, at leisure or at work) takes time and is resource intensive; and
- the active participation of people, organisations and sectors and their engagement with the projects to effect the desired changes in behaviour that results in waste prevention.

⁶ To measure a local authority's commitment to waste prevention, a service indicator is proposed, as described in section 7.1.

Appendix A

Consideration of the Annex IV examples (Waste Framework Directive)

<p style="text-align: center;">Examples of waste prevention measures referred to in <i>Article 29</i> of the draft Waste Framework Directive</p>	<p style="text-align: center;">National Waste Prevention Programme Response</p>
<p><i>Measures that can affect the framework conditions related to the generation of waste</i></p>	
<p>1. The use of planning measures, or other economic instruments promoting the efficient use of resources.</p>	<p>The roll-out of pay-by-use has reportedly reduced the presentation of waste at household kerbsides. However the analysis does not demonstrate whether this is brought about by real decreases in household waste generation or increased use of alternative waste disposal outlets. The national statistics show no decrease in household waste generation.</p> <p>The NWPP will recommend the use of planning and economic instruments where necessary to bring about change in certain sectors. (See GBI)</p>
<p>2. The promotion of research and development into the area of achieving cleaner and less wasteful products and technologies and the dissemination and use of the results of such research and development.</p>	<p>The current STRIVE programme deals with this topic particularly in its Cleaner Greener Production Programme. The NWPP will implement the results and findings, and disseminate relevant case studies, in all relevant projects e.g. Green Hospitality Awards which is an extension of a CGPP project (see also Green Business Initiative).</p>
<p>3. The development of effective and meaningful indicators of the environmental pressures associated with the generation of waste aimed at contributing to the prevention of waste generation at all levels, from product comparisons at Community level through action by local authorities to national measures.</p>	<p>All NWPP projects have built-in means of measuring their impact. Indicators alone will not contribute to waste prevention, but will indicate where action is best concentrated. Prevention indicators take time to develop and will be reported as they become available. (See targets and indicators). Local authorities are involved through the Local Authority Prevention Network.</p>
<p><i>Measures that can affect the design and production and distribution phase</i></p>	
<p>4. The promotion of eco-design (the systematic integration of environmental aspects into product design with the aim to improve the environmental performance of the product throughout its whole life</p>	<p>Eco-design will be promoted in the following areas through the National Waste Prevention Programme:</p> <ul style="list-style-type: none"> • Packaging Prevention Programme;

<p>cycle).</p>	<ul style="list-style-type: none"> • waste electrical and electronic equipment (via WEEE and ROHS directives); • batteries; • decorative paints; • End-of-Life Vehicles; • Upcoming Energy Using Products Directive <p>Eco-design is an important tool in the sectoral approach to resource efficiency and waste prevention. Suitable case studies could be identified and disseminated through the Green Business programme.</p> <p>Enterprise Ireland provides support to enterprises through the <i>Environmentally Superior Products</i> and other programmes.</p>
<p>5. The provision of information on waste prevention techniques with a view to facilitating the implementation of best available techniques by industry.</p>	<p>Information provision and establishment of best practice demonstration are standard tools for GBI.</p> <p>There is potential for the explicit implementation of waste prevention through IPPC licensing.</p>
<p>6. Organise training of competent authorities as regards the insertion of waste prevention requirements in permits under this Directive and Directive 96/61/EC.</p>	<p>Engagement is ongoing with those responsible for granting and enforcing IPPC and waste licences and waste permits.</p>
<p>7. The inclusion of measures to prevent waste production at installations not falling under Directive 96/61/EC. Where appropriate, such measures could include waste prevention assessments or plans.</p>	<p>Addressed by greenbusiness.ie and Green Hospitality Award projects and general sectoral approaches including dry cleaning and vehicle refinishers (AIC) initiatives.</p>
<p>8. The use of awareness campaigns or the provision of financial, decision-making or other support to businesses. Such measures are likely to be particularly effective where they are aimed at, and adapted to, small and medium sized enterprises and work through established business networks.</p>	<p>Addressed by greenbusiness.ie, packaging prevention and Green Hospitality Award projects and general sectoral approaches. Enterprise Ireland have an Envirocentre.ie website.</p>
<p>9. The use of voluntary agreements, consumer/producer panels or sectoral negotiations in order that the relevant businesses or industrial sectors set their own waste prevention plans or objectives or correct wasteful products or packaging.</p>	<p>Addressed by greenbusiness.ie and Green Hospitality Award projects and general sectoral approaches. The intervention of the Department of the Environment, Heritage and Local Government will be key in this regard.</p> <p>Repak is co-ordinating a retail sectoral agreement to</p>

	<p>reduce the use of packaging.</p> <p>The National Construction & Demolition Waste Council represents a voluntary industry initiative to maximise recycling of C&D waste.</p>
<p>10. The promotion of creditable environmental management systems, including EMAS and ISO 14001.</p>	<p>IPPC and waste licences require the development of an environmental management system.</p> <p>The Green Hospitality Award is an EMS-based continuous improvement system, aligned with the European EU Flower eco-label.</p> <p>Other industrial development bodies (including Enterprise Ireland) promote EMS in SME businesses and provide support for its implementation at enterprise level.</p>
<p><i>Measures that can affect the consumption and use phase</i></p>	
<p>11. Economic instruments such as incentives for clean purchases or the institution of an obligatory payment by consumers for a given article or element of packaging that would otherwise be provided free of charge.</p>	<p>The plastic bag levy, landfill tax, Vehicle Registration Tax and producer recycling fund (WEEE) are all examples of this type of measure. The use of variable VAT rate to redirect consumers to better environmental purchases has been proposed at National Waste Prevention Committee meetings, but is beyond the scope of this Prevention Plan to explore further. The Department of the Environment, Heritage and Local Government will investigate deposit refund mechanisms for packaging in the current international review of waste management.</p>
<p>12. The use of awareness campaigns and information provision directed at the general public or a specific set of consumers.</p>	<p>The Race Against Waste completed its work in 2006. The change.ie and power-of-one campaigns (targeting climate change) are ongoing. The NHWMP recommends the provision of consumer information regarding household hazardous waste prevention and disposal.</p>
<p>13. The promotion of creditable eco-labels.</p>	<p>The Green Hospitality Award is an EMS-based continuous improvement system, aligned with the European EU Flower eco-label.</p>
<p>14. Agreements with industry, such as the use of product panels such as those being carried out within the framework of Integrated Product Policies or with</p>	<p>This type of initiative is likely to come out of GBI sectoral approaches. These measures are all valid tools in dealing with industrial sectors.</p>

<p>retailers on the availability of waste prevention information and products with a lower environmental impact.</p>	
<p>15. In the context of public and corporate procurement, the integration of environmental and waste prevention criteria into calls for tenders and contracts, in line with the Handbook on environmental public procurement published by the Commission on 29 October 2004.</p>	<p>The National Hazardous Waste Management Plan recommends that Government take the lead in developing mechanisms, setting targets and indicators for green public procurement. The Market Development Group should have a contribution to make to this initiative.</p>
<p>16. The promotion of the reuse and/or repair of appropriate discarded products or of their components, notably through the use of educational, economic, logistic or other measures such as support to or establishment of accredited repair and reuse-centres and networks especially in densely populated regions.</p>	<p>Several waste exchange websites are in operation, including one aimed specifically at businesses (wastematchers.ie, Cork region). A similar scheme is currently being proposed for the Dublin region to complement the existing waste exchange at dublinwaste.ie. Supply Network Shannon operates a pallet exchange scheme with the support of the Limerick/Clare/Kerry Regional Waste Management Office. The Ballymun Regeneration project supports a furniture refurbishment business. Several social enterprises refurbish electrical equipment and other material for resale. The National Waste Prevention Programme supports Schoolbookexchange.ie. The Department of the Environment, Heritage and Local Government is developing a WEEE reuse protocol.</p>

Appendix B

Consideration of the submissions made by National Waste Prevention Committee members on the draft Plan circulated in October 2008

Two submissions were received one from the Chartered Institution of Wastes Management and one from the Department of the Environment, Heritage and Local Government.

The following table outlines the issues raised in the submissions, and the EPA's response to them.

Item raised in submission	How item is incorporated into Plan
<i>CIWM submission (21st November 2008)</i>	
<p>1. Better integration of the National Waste Prevention Programme and Regional Waste Management Plans (WMPs) would take place if the WMPs were obliged to have regard to the NWPP and align their aims and objectives with the NWPP.</p>	<p>Implementation of RWMPs is a matter for the designated RWMP Authorities. On the prevention aspects of these plans, NWPP works closely with local authorities through the Local Authority Prevention Network, providing opportunities for them to engage in proven, nationally co-ordinated prevention projects.</p> <p>NWPP will make submissions on any revision of WMPs and will highlight any opportunities in their proposals for prevention.</p>
<p>2. The Plan is vague on how projects will be implemented.</p>	<p>The intention of the Plan is to present a framework for NWPP's priorities for action up to 2012. The annual reports provide more detail on progress with each project.</p>
<p>3. Home composting is proposed in the Plan, but evidence shows that home composting can generate CO₂ emissions. Measurement of the effectiveness of home composting will take effort – the submission almost suggests a disproportionate effort.</p>	<p>The home composting proposal also includes elements to promote food waste prevention and the proper use of brown bins. This will raise awareness and improve consumer waste behaviour. Home composting is a requirement of national policy and the Department's recent circular.</p>
<p>4. CIWM believe that the packaging prevention programme is now called the Packaging Optimisation Programme – the shifted emphasis being to avoid more product waste being generated as a result of inadequate "minimised"</p>	<p>Packaging has a role to play in avoiding product damage in-transit so a balance is sought between under and over packaging. These are evolving concepts. Repak's website does not currently</p>

packaging. The Plan should reflect this shift in emphasis.	mention the changed programme name.
5. The work being carried out by the Global Action Plan in Cork (at Cork Environmental Alliance) and Dublin (at Ballymun Regeneration Ltd) should be recognised in the Plan with a view to GAP getting support and funding from the National Waste Prevention Programme.	GAP is now mentioned in the Plan. The EPA met Ballymun Regeneration in 2008 and discussed the potential for funding for a range of projects. This discussion remains open. The Local Authority Prevention Network is also a potential means of GAP being supported through local authorities.
6. The submission queries the prioritisation of projects under the NWPP.	The allocation of priority reflects statutory resource related obligations first and the potential impact and multiplier effect that can be achieved from the point of view of environmental protection second. The order of priority reflects what will be possible as staffing and financial resources allow.
7. The submission agrees that one of the main elements for the Plan's success is people.	This is agreed.
8. The submission requests that "efforts be brought to bear for the national introduction of proper pay by weight or by use charges and that real and tangible efforts are taken to prevent the current flat charging mechanisms that are prevalent nationally."	The current review of national waste policy, currently being preceded by the international review, is the appropriate place to address this item.
<i>Department of the Environment, Heritage and Local Government submission (18th December 2008)</i>	
The submission notes aspects of the revised Waste Framework Directive.	The prevention plan has regard to the revised WFD and the issues noted concerning EU Commission work on this area will be monitored.
The Plan should comment on the successes and failures of items mentioned in the 'Outline Work Plan 2004-2008'.	The Outline work Plan produced in 2004 was conceived in advance as a framework within which to develop projects. The way many of the projects actually progressed would make them unrecognisable to what was originally proposed. Experience and conversations with stakeholders

	<p>of what is possible were key in making the NWPP an evolutionary, learning process. Several projects never progressed beyond discussion. Other existing successful projects were not mentioned in the outline. All in all, the NWPP now comprises a diverse portfolio of projects, and commentary on their progress is presented in this Plan, in NWPP annual reports and in other documents.</p>
<p>It is important that LAPD projects can demonstrate real prevention opportunities.</p>	<p>All projects have built-in metrics. As LAPD was a demonstration project, experience with metrics will enable us to make them more effective. Much prevention progress is intangible and reflects more the capacity of the newly trained and experienced prevention officers than any quantitative progress they may have demonstrated. LAPD people appeared on recent Eco-eye TV and spoke eloquently about prevention. The Farm Prevention Guide was another hard deliverable not planned in advance but indicates significant capacity development.</p> <p>All parties to the LAPD programme will agree that it has been very effective in creating a team of prevention officers that must now be maintained in place.</p>
<p>Green Business Initiative – there needs to be a very pro active approach to recruitment of companies to ensure the success of the project.</p> <p>It could be expanded to look at other ideas. For example in France they have a programme to reduce waste by 10% and have recruited 100 companies into the programme. This type of initiative may yield more concrete results from the programme. In any case there needs to be some way of measuring the success of the initiative.</p>	<p>Agree – the success of Green Hospitality Award shows what businesses can achieve. A similar approach is being taken for other sectors. GHA is also yielding concrete prevention metrics and this approach will be applied also as Green Business is rolled out.</p>
<p>The submission makes a number of suggestions for projects or develops ideas presented in the Plan, including:</p> <ul style="list-style-type: none"> • the need for pro-active recruitment of 	

<p>companies to ensure the success of the Green Business Initiative.</p> <ul style="list-style-type: none"> • Awards for continuous improvement as opposed to one-off awards. • Extension of the local authority prevention course to other sectors. • Eco-design • Waste Prevention Week • European Campaign for Waste Reduction (100Kg less MSW per person) 	<p>Agree - is being implemented in a similar manner to the now highly successful Green Hospitality Award.</p> <p>Agree - as changes in behaviour need to be embedded in organisations/individuals to improve prevention capacity generally.</p> <p>The course is already available to non-LA staff, and further work will be done to re-energise other business-oriented courses.</p> <p>Eco-design could be included in Green Business.</p> <p>A National Waste Prevention Week could be managed by DEHLG perhaps through An Taisce.</p> <p>The European MSW reduction challenge could be taken up by RWMP Authorities or LAPN participants.</p>
<p>Feel that this section should focus on the core prevention projects mentioned above rather than including the whole work programme for the Resource Unit of the Office of Climate Licensing and Resource Use.</p>	<p>The ability of the Resource Use Unit to develop the core prevention projects will depend on adequate funding and resources being available to implement the Unit's work programme as a whole. The core prevention projects cannot be considered nor their implementation progressed in isolation.</p> <p>Priority has been given to statutory resource/hazardous substances related projects where there are binding EU obligations to be discharged. These projects do demonstrably contribute to the overall objectives set out for the National Waste Prevention Programme 2009-2010 incorporating the National Hazardous Waste Management Plan 2008-2012.</p>