

Regional Waste Coordinator  
Connacht-Ulster Region Waste Management Office  
Mayo County Council  
Áras an Chontae  
Castlebar, Co. Mayo

19<sup>th</sup> December 2013

**Submission on preparation of Connacht-Ulster Regional Waste Management Plan**

Dear Sir or Madam,

The EPA would like the following submission to be taken into consideration when preparing the Connacht-Ulster Regional Waste Management Plan. The same submission is being sent to the Regional Waste Coordinators for the Southern Region and Eastern-Midlands Region.

**Regional waste data indicators**

The EPA is strongly of the view that the indicators chosen for the waste management plans must be measurable, consistently applied across the three regions and have existing (or planned) validated data sources. The indicators should ideally measure whether policy/legislation implementation and awareness/prevention campaigns are having an impact on behaviour.

The EPA does not recommend setting regional indicators based on national legislative EU targets (eg targets set under Producer Responsibility Directives and Waste Framework Directive). The EPA is not in a position to provide regional information on these waste streams to the lead authorities, as the waste is tracked at national versus regional level.

The European Commission however seeks national and regional municipal waste data under the Regional Environmental Questionnaire (REQ)<sup>1</sup>, specifically on how municipal waste generated within a region is treated (landfilled, incinerated, recycled, composted). The REQ is a non-statutory reporting obligation. With inter-regional movements and even export of municipal waste for final treatment, tracking how municipal waste generated within a region is finally treated is impossible to report with accuracy with existing waste data reporting systems. The EPA therefore reports national municipal waste data only for the REQ. As the Commission has flagged that regional waste reporting may become a statutory obligation in the future, the EPA raises this issue for information purposes. It should also be noted by the lead authorities that the Commission requires Member States to report regional statistical data by NUTS2<sup>2</sup> Region. The NUTS2 Regions in Ireland ((i) Border, Midland and Western and (ii) Southern and Eastern) do not align neatly with the waste management regions.

---

<sup>1</sup> The REQ is part of the European Statistical Programme in the field of Environment Statistics.

<sup>2</sup> Nomenclature of Territorial Units for Statistics (NUTS) is a geocode standard for referencing the subdivisions of countries for statistical purposes.

The EPA requests that the lead authorities bear in mind potential future waste reporting needs at NUTS2 level when preparing any regional waste management reporting systems.

We have set out below some examples of waste indicators that we would like the lead authorities to consider for waste management plans. The main value of these indicators is the comparability across regions, and the availability of the data on an annual basis (from the waste collection permit annual returns, and data already collated by local authorities for national waste reporting such as household waste brought to bring bank and civic amenity sites).

1. Household waste managed (tonnes, and kg per inhabitant)
2. Household waste generated (tonnes, kg per inhabitant)
3. Estimate of household waste uncollected (tonnes, kg per inhabitant)
4. Household waste collected at kerbside (kg per household served)
5. Quantity of kerbside residual household waste collected at kerbside per household served
6. Quantity of kerbside mixed dry recyclables collected at kerbside per household served
7. Quantity of kerbside organics collected at kerbside per household served
8. Quantity of household glass collected (kg per inhabitant)
9. Percentage of occupied houses not on a kerbside collection service
10. Percentage of serviced households on a 3 bin, a 2 bin and a 1 bin system

As the EPA reports on the above indicators on a national basis, we see benefits in working with the lead authorities to develop common procedures/guidance to ensure consistency of application of calculation methodologies, use of EWC codes and waste definitions, and common validated data sources. This would contribute to transparency and comparability of data reported nationally and regionally.

The waste collection permit annual return dataset is a key resource for the lead authorities on the source and quantity of waste collected as collectors report on where they collect the waste (currently by individual local authority functional area). In addition, the CSO's Quarterly National Household Survey will have a Green Module in Q2 2014. This module includes questions on household waste management, such as management of residual and recyclable waste, household hazardous waste, waste batteries, WEEE and home composting. Such information, when made available by the CSO, will also be a valuable resource.

As the amount of commercial waste is influenced by the density of commerce in an area, the EPA is of the view that this would not produce a cross regional comparator.

Existing waste indicators, such as Service Indicators (SI) and the RMCEI indicators, should be built into the regional waste management plans where appropriate. These data are collated annually, so there would be no new reporting obligation introduced. DoECLG has indicated that the SIs will be reviewed in the near future. If the SIs are fit for purpose (ie focussing on areas where local authorities continue to provide waste services, such as bring banks, recycling centres, waste environmental awareness programmes and waste prevention initiatives), the indicators would be useful information to report in the waste management plan annual reports.

### **Waste management infrastructure**

One of the requirements of the waste management plans is to set out an analysis of the current waste management situation in the geographical entity concerned, including existing waste collection schemes and major disposal and recovery installations.

The lack of a live national register of waste permitted/certificate of registration facilities in the State is a significant information gap for waste infrastructure planning and also for legislative reporting

purposes. For example, the Waste Statistics Regulation (No. 2150 of 2002) requires biennial reporting on the number and capacity of certain waste recovery and disposal activities in the State<sup>3</sup>, and the EPA has not had a complete register of national waste infrastructure in order to report on this dataset comprehensively.

The EPA recommends that lead authorities advocate for a national register of local authority authorised facilities (permits and certificates of registration). This register should be live, have an accessible search facility and include key information such as the location of the activity, the principal treatment activity and the capacity of the activity for the principal treatment activity.

### **Waste prevention**

It is imperative that waste prevention form a central role in regional waste management plans. Waste prevention is a legal requirement and should be at the forefront of all waste management activities. The Waste Framework Directive establishes that *“waste prevention should be the first priority of waste management”*.

In turn, the national transposition Regulations (S.I. 126 of 2011) make it a legal requirement for local authorities to provide for waste prevention measures in their Regional Waste Management Plans.

Top-down leadership is needed to ensure national commitment and a consistent and unified approach. It can also supply valuable funding mechanisms. The EPA’s National Waste Prevention Programme is already successfully fulfilling this function. However, a bottom-up approach, in line with the principles of Local Agenda 21, is required to facilitate action on the ground. Prevention needs to be embedded in the community. The key to success is having people with local expertise driving waste prevention at grassroots level.

There is now a network of local authority personnel with skills and experience in dealing with communities, businesses and public organisation to implement waste prevention and resource efficiency (LAPN — Local Authority Prevention Network). These personnel have a good understanding of waste prevention and resource efficiency and have experience identifying and addressing barriers to successful implementation so that further achievements can be made more easily.

In recognition of the priority status for waste management activities to be included in waste management plans, it is essential that such activities be adequately resourced. Based on experience with LAPN in the previous waste management regions, a full time waste prevention co-ordinator, working with environmental awareness officers in each local authority in that region, is a proven successful model for implementing effective waste prevention activities. Given the increased size of the new Waste Regions, it is recommended that the number of waste prevention co-ordinators be increased accordingly to ensure such activities are given the priority required.

Waste prevention activities are not difficult. The LAPN programme has experience in how they may be achieved – without undue stress on resources and its related tools form an excellent basis for beginning and continuing the process. While often the focus is on reducing consumption of resources and waste prevention in order to meet various environmental policy objectives and commitments, it should not be overlooked that resource efficiency also brings cost savings, and may contribute to greening the economy and continuing economic recovery.

---

<sup>3</sup> (i) Number of waste treatment facilities per NUTS2 Region for recovery activities (R1 to R11) and for disposal activities (D1, D5, D10 and D12). (ii) Capacity of R1 and D10 activities and the residual capacity of landfills accepting waste for disposal (D1, D5, D12).

## **Suggested waste prevention activities**

The following suggestions would ensure that the regional waste management plans are in line with the Waste Framework Directive, and Irish policy (including the National Waste Prevention Programme). An annual action plan should form the basis for achieving some of the aspirations set out in the regional waste management plans, bringing them down to manageable and achievable work packages. It is also essential that progress is reviewed annually with a view to preparing the action plan each year. Prevention is achievable as a top priority within the lifespan of the revised plans, within 5 years work programmes can be prioritised in line with the waste hierarchy.

1. Local authorities should:
  - Measure their own waste & establish an improvement benchmark;
  - Identify resource efficiency actions that exhibit best practice;
  - Be seen to lead the way in the community – particularly re-use.
2. Engage with the National Waste Prevention Programme by:
  - Prioritising actions that can be delivered locally;
  - Appointing a local authority or regional liaison that can engage with the National Waste Prevention Programme;
  - Acting as a local enabler for Green Business, Green Hospitality, etc.
3. Enable a shift to preventative action in the community. This will require:
  - Prevention specific training & re-training for local authority staff;
  - Linking of local grant aid such as LA21, Arts & Tourism, Economic Development, schools & colleges, etc. to resource efficiency;
  - Undertaking at least one training seminar for businesses on resource efficiency per local authority per annum.
4. Develop a Regional Communications Strategy to promote waste prevention. The following attributes are recommended:
  - Doesn't need to be complicated;
  - Doesn't need to be expensive;
  - Should use existing resources;
  - Should make use of the wide range of case studies which already exist;
  - Should disseminate guides & websites already developed;
  - Should integrate with existing programmes.

The LAPN Project catalogue would be a beneficial starting point for such activities (further details available on <http://www.localprevention.ie>).

5. Spot opportunities upon which to capitalise. Examples include:
  - Improved segregation, recycling and other waste management options can lead to preventative action
  - Home composting is opportunity to promote food waste prevention
  - Promote public composting demonstration sites and master composter networks
6. Maximise use of resources. To accomplish this, Regions could:
  - Establish strategic partnerships by collaborating with other programmes & projects for example SEAI, Enterprise Ireland, Enterprise boards, Energy Agencies, etc.
  - Lend additional support to our local SMEs - particularly the smaller establishments (National Reform Programme);

- Promote & Host Resource Exchange Initiatives such as SMILE.

7. The Social Economy & regional waste management plans

- Support and enable community and voluntary sector, e.g. food banks, feed the poor initiatives, residential and day-care facilities;
- Establish Re-use Elements/Shops at CASS;
- Promote & Encourage Repair;
- Enable the voluntary sector with establishing reuse measures such as Furniture & Paint Re-use schemes.

\*\*\*\*\*

The points in this submission have been raised by my colleagues Fiona McCoole and Odile le Bolloch at previous meetings of the National Co-ordination Committee for Regional Waste Management Plans. I hope that this Committee can be an ongoing forum for exchange of information and development of the plans and their implementation.

On a general point, the EPA would like the lead authorities to co-operate on inter-regional waste movements and accept the development of national infrastructure where regional infrastructure may be inappropriate.

If you would like to discuss any of the points made in this submission, please don't hesitate to contact me.

Yours sincerely,



---

Dr Jonathan Derham  
Programme Manager  
Office of Climate, Resource and Research