

## 9. RECOMMENDATIONS

Based on the analysis set out in the preceding chapters and the information contained in the Strategy Study Report, a series of recommendations are set out in this chapter.

### 9.1 Prevention of hazardous waste

1. A national waste prevention programme with an emphasis on hazardous waste should be developed and implemented. The hazardous waste Prevention Programme proposed in this Plan should deal with process waste and product waste. This will ensure that both manufacturers and consumers become aware of and responsible for hazardous waste management. The initial emphasis should be on initiatives which will yield the greatest reduction in environmental impact and which will maximise environmental benefits.
2. The following targets for the prevention of hazardous waste should be adopted:
  - a) no increase in hazardous waste disposal over 1996 quantities – a “standstill scenario”; and
  - b) elimination of unreported hazardous waste.
3. A core “Prevention Team” should be established to prioritise, implement and manage the Prevention Programme.
4. A mechanism for funding the Prevention Programme should be established based on application of the polluter pays principle.
5. Industrial developments should be considered in terms of their environmental impacts and the development of industry with low hazardous waste generating potential should be a priority.

### 9.2 Collection of hazardous waste

1. Household hazardous waste should be segregated. Local authorities should plan for and make provision for waste collection facilities to householders. Any such service

should be available to other small scale generators of hazardous waste.

2. Consideration should be given to: (1) the imposition of producer responsibility obligations; (2) the operation of deposit and refund schemes; and (3) the commencement of other waste collection measures which would assist in improved management of unreported hazardous waste.
3. Information campaigns should be conducted
  - (a) locally, by local authorities as part of their waste management planning publicity, and
  - (b) nationally, by ENFO, the Department of the Environment and Local Government, etc., to ensure the success of collection initiatives and to increase collection rates. These campaigns should initially focus on household, SME and other unreported hazardous waste.

### 9.3 Recovery and disposal of hazardous waste

1. In order to apply the proximity principle and to ensure security of hazardous waste recovery and disposal outlets, Ireland should seek to become self sufficient in hazardous waste recovery and disposal capacity.
2. The majority of hazardous waste processed off site in Ireland in 1996 and 1998 was recovered. Continued support may in future be required for the hazardous waste recovery industry to ensure that it remains viable. The possibilities for additional state funding should be explored.
3. At least two engineered cells for the landfill disposal of hazardous waste should be developed, initially in the south-west and Dublin areas. These cells could be constructed adjacent to existing landfill facilities with the objective of utilising existing infrastructure such as site roads, weighbridges and staff facilities. The prospect of municipal thermal treatment facilities could be taken into account in locating and determining the capacity of hazardous waste landfill disposal facilities.

4. A thermal treatment disposal facility for the management of hazardous waste currently exported for disposal is required if Ireland is to become self sufficient in hazardous waste management. In the event of a facility being established, consideration should be given to the imposition of import and export restrictions in relation to the disposal of hazardous waste.
5. An inventory of PCB holdings is required to satisfy Council Directive 96/59/EC on the disposal of polychlorinated biphenyls and polychlorinated terphenyls (PCB/PCT). The EPA should consider the provision of technical information and guidance to holders of such holdings and equipment.

#### 9.4 Hazardous waste disposal sites

1. Local authorities should compile 'Section 26 registers' based on the methodology outlined in this Plan.
2. Each site in a 'Section 26 register' should be subjected to a preliminary risk assessment and categorisation (see chapter 7.5).
3. Statutory guidance on the identification of appropriate remediation strategies should be developed by the EPA.

#### 9.5 Resources and funding

1. Resources should be made available for the development and implementation of the Prevention Programme with an initial focus on the establishment of a prevention team and a longer term focus on the making of voluntary agreements, or the use of other instruments, for the prevention of hazardous waste.
2. Resources should be made available for the provision of improved hazardous waste collection, recovery and disposal facilities and services.

#### 9.6 Implementation of the National Hazardous Waste Management Plan

1. An Implementation Committee should co-ordinate implementation of this Plan. The membership of the committee could be made

up of representatives of organisations with a statutory responsibility for the management of waste and of producer organisations.

2. The Implementation Committee should periodically report on implementation of the Plan. All statutory bodies responsible for the implementation of the Plan should report progress to the Committee on an annual basis.
3. A technical working group should be established to consider the prescription of hazardous wastes in Ireland as provided for in the Waste Management Act, 1996.

#### 9.7 Priorities 2001-2006

1. The establishment of an Implementation Committee by the Department of the Environment and Local Government. This committee would be responsible for guiding the overall implementation of the Plan.
2. The establishment of a Prevention Team to implement the Prevention Programme. This 'Team' would be responsible for the development of the Programme, for the setting of priorities within the Programme itself and for their initiation.
3. The identification and elimination of unreported hazardous waste to prevent its uncontrolled disposal and resultant emissions to the environment.
4. The identification, preliminary evaluation and prioritisation of sites at which hazardous waste disposal has taken place and the implementation of remedial works at priority sites.
5. Establishment of an improved collection infrastructure for hazardous household, agricultural and SME wastes.
6. The allocation of financial and technical assistance for the development of facilities for the recovery and disposal of hazardous waste where existing capacity is unsatisfactory.
7. The development of hazardous waste landfill capacity and thermal treatment for hazardous wastes requiring disposal to achieve self sufficiency and reduce our reliance on export.
8. Improved public awareness of the impacts of hazardous wastes.

9. Build on on-going prevention, research and demonstration initiatives – for example, the *Cleaner Production Pilot Demonstration Programme*.

#### **9.8 Longer term priorities beyond the five year review period of the Plan**

1. The achievement of self sufficiency in hazardous waste management.
2. No increase in hazardous waste disposed of over 1996 quantities.
3. The qualitative reduction (i.e. reduction in the degree of hazard) of hazardous waste.

