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Re: EPA Response to public consultation on 'Exporting a Resource Opportunity'

Dear Bernie,

I write further to the above public consultation. EPA welcomes the opportunity to provide input to national policy-making on this important topic and in the following pages makes some specific comments with regard to the specific discussion points presented. The comments made in this document are intended to build on the national policy making process, and follow on from previous EPA submissions in this area – including that made in September 2010 on the *Draft Statement of Waste Policy*.

In general, EPA welcomes consideration of the issues raised in the consultation document. The recently published Circular Economy package has put significant emphasis on maintaining the value and utility of materials and many of the points raised in this paper would support this development. Recent shifts away from landfilling are undoubtedly welcome, but the shift towards export represents a clear loss of materials from the Irish materials cycle; and also dilutes the income collected via the environment fund – which has been used to great effect on environmental projects across the country.

The following pages provide some detailed responses on a specific number of the Discussion Points raised in the paper. Please do not hesitate to come back to the Agency if further detail or clarification is required on any aspect of this submission.

With best regards,



Dr Shane Colgan

Manager, Resource Efficiency Unit

1. Consider whether to increase the landfill levy.

a. What impacts are likely from an increase in the levy? Increase in levy will likely be a pressure to divert further waste from landfill unless the costs of the alternative to landfill are more expensive.

b. If the levy is to be increased, by how much should it be raised to successfully divert resources from landfill? The levy needs as a minimum to keep rate with inflation. In order to divert e.g. MSW from landfill, then the cost of disposing the waste at a landfill needs to be more expensive than the costing of disposing or recovering elsewhere in Ireland or abroad. An economic analysis (preferably informed by a regulatory impact assessment) would really need to be carried out to determine this properly and with any degree of certainty.

c. Is the proposal likely to create enterprise opportunities? If so, what kind? If waste is diverted from landfill, then the waste will have to be handled, stored and managed in a different way. This may lead to additional job creation but it is difficult to estimate how much as there are so many variables in how the waste might be managed.

There are already some strong examples of this effect in action in Ireland - such as Boomerang Recycling in Cork¹. Over the course of 2015, Boomerang processed over 200 tonnes of discarded mattress into useful products and provided job-based training to 22 people through the Tús work placement scheme. A comparable scheme operates in Dublin with similar levels of employment and processing.

2. Consider increasing the landfill levy on Biodegradable Municipal Waste (BMW) and reducing the levy on inert waste.

a. What impacts are likely from an increase in the levy on BMW?

It should firstly be noted that any amendments to the current levy system would need to be accompanied by an increased level of scrutiny by the relevant competent authorities. The existing levy system is relatively straightforward and the introduction of tiered levies such as is considered here would likely lead to increased quantities of waste being declared and this would need additional scrutiny/verification by competent authorities.

BMW is the biodegradable component of MSW. It is likely that an increase in the levy on BMW will lead to a reduction in the tonnages of BMW being landfilled. This is positive in terms of environmental impact as ultimately less BMW to landfill will lead to less harmful greenhouse gas emissions and also will lead to less harmful leachate generation.

However it is uncertain how the BMW that is diverted from landfill will be managed. For example the MSW/BMW may be redirected for incineration/energy recovery, may undergo processing into RDF/SRF and be used as a fuel either in Ireland or abroad or the MSW/BMW may go for bio-stabilisation prior to landfilling. Ultimately the waste is likely to be managed in the way that is most cost effective for the waste operators.

At present, there is still considerable amounts of residual waste from 2 and 3 bin household & commercial bin collections being landfilled (see Table 1 below - Tonnages of MSW wastes accepted at landfill in 2015 nationally, unvalidated figures). The residual waste contains BMW. Further roll-out of

¹ <http://boomerangenterprises.ie/>

the 3-bin household waste will decrease the BMW content in the residual waste being landfilled nationally. Increased source separation of food and garden waste, paper and cardboard will further decrease BMW being landfilled.

Table 1 - Figures reproduced from the EPA's online quarterly MSW/BMW reporting system for landfills, 2015 data (unvalidated returns)

Waste Type	MSW Tonnes	BMW Tonnes	% BMW in MSW
2-bin residual commercial waste	36,424.21	27,318.14	75.00%
2-bin residual household waste	57,813.67	36,422.62	63.00%
3-bin residual commercial waste	59,585.01	40,517.79	68.00%
3-bin residual household waste	95,933.81	45,088.90	47.00%
Ash residue from MSW incineration	28,787.28	0.00	0.00%
Bio-stabilised residual waste	113,916.77	0.00	0.00%
Bulky waste from sorting of MSW skips	81,931.38	40,965.68	50.00%
Fines residues from MSW bin collections ("wet waste")	24.62	23.39	95.00%
Fines residues from MSW skips	192.13	76.85	40.00%
Other	59,722.20	38,024.22	63.67%
Oversize residues from MSW bin collections ("wet waste")	21,776.10	8,928.21	41.00%
Oversize residues from MSW skips	76,095.66	32,721.12	43.00%
Residual MSW from civic amenity facility	4,636.93	2,921.27	63.00%
Residues from source separated recyclable waste ("clean MRF")	3,364.14	1,581.14	47.00%
Untreated 1-bin commercial waste	465.82	358.68	77.00%
Untreated 1-bin household waste	436.96	284.02	65.00%
Untreated cleansing waste (fly-tipping, street bins, road sweepings etc.)	779.76	506.85	65.00%
Totals	641,886.45	275,738.88	42.96%

b. What impacts are likely from a decrease in the levy on inert waste?

It is likely that very little inert waste in practice is subject to the landfill levy so the effect of reducing the levy on inert waste would likely have little or no impact on inert waste management in Ireland. If inert waste goes to landfill, then it tends to be used in recovery operations such as daily cover, construction of haulage roads or internal cell bunds.

A lot of inert waste currently goes to local authority permitted recovery sites and it is desirable that an adequate network of such sites is in place to deal with this material.

The Levy Regulations S.I. No. 189 of 2015 already exempt a lot of inert waste from the landfill levy including non-hazardous waste from construction and demolition activity, comprising concrete, bricks, tiles, road planings or other such similar materials, subject to certain criteria being met, and excavation spoil comprising clay, sand, gravel or stone, which is used for landfill site engineering, restoration or remediation purposes.

What would be more effective is if there was less inert waste generated in the first place. It should be clear when inert materials can be reused directly without the need to be classified as waste. It would

also help if there was end of waste criteria and quality protocols in place in Ireland so that C&D waste can leave the waste regulation system and be recycled without the need to landfill it.

c. Are both required to be effective?

It is not clear what question is referring to. Effective in what? Driving BMW from landfills? Driving inert waste from landfills? There is a risk in imposing a landfill levy on inert waste that it will drive undesirable waste streams such as C&D fines or inert waste residues (that may contain contaminants) to unsuitable backfill sites or sites that do not have the correct authorisation to take these materials. The consultation paper is focussed on the topic of exporting waste resources. It is clear that MSW is being exported as it is or as RDF/SRF. Inert waste is being managed within Ireland. Also it is likely that with the exception of construction and demolition (C&D) waste fines that a lot of other inert streams such as clean concrete, bricks stones are being managed and will continue to be managed under waste permit recovery operations.

Further improvement of C&D waste recycling rates would be aided by the development of end of waste criteria for aggregates generated from C&D waste like concrete, bricks and stones. It is considered that the introduction of a levy exemption for C&D fines last July should be carefully examined in order to see how much of that stream was declared under the exemption.

d. Is there an alternative means to achieve a greater diversion of BMW from landfill?

Increasing public awareness (commercial and household) about food waste prevention and correct food waste management is key.² Enforcement of the Food Waste Regulations in an effective manner so that separate food waste collections are in place where possible. Provide clear incentives to the public to source-separate food waste. Support public awareness campaigns which inform householders about which wastes are appropriate for each bin type, to reduce contamination rates. Encourage waste collectors to take measures to reduce contamination of the dry recyclables and organic bins by their customers, and increase the uptake of the organics bin. Continue to support food waste prevention programmes, so that less food waste is generated in the first place. Increase amount of green waste collection points so that green waste is not put into residual waste bin. Put the correct market conditions in place so that it is economically feasible to compost food waste in Ireland and that there are ready markets for the compost product. It is difficult to further decrease BMW unless there is a driver such as lower European BMW targets that must be met. It is likely that Ireland will meet the 2016 Landfill Directive BMW diversion target and will landfill less than the target 427,000 tonnes of BMW in 2016 (275,738.88 tonnes of BMW landfilled in 2015 – see Table 1 (unvalidated).) Beyond 2016, it is unclear at this time if new lower BMW targets will be put in place as the Circular Economy Package legislative proposals do not propose BMW targets post-2016, but instead propose a new target for municipal waste “*by 2030 the amount of municipal waste landfilled in reduced to 10% of the total amount of municipal waste generated.*”

Implementation of a pay-by-weight system should also, if properly implemented and enforced, help to achieve a greater diversion.

e. Is the proposal likely to create enterprise opportunities? If so, what kind?

Diverting food waste from landfill will only create jobs in Ireland if the correct economic climate exists to make the recycling of the food waste (or garden waste) an industry that is economically feasible.

² The CSO's recent publication on their *Quarterly National Household Survey – Environment Module* provides useful information on household waste management practices. See <http://www.cso.ie/en/releasesandpublications/er/q-env/qnhsenvironmentmoduleq22014/>

Anecdotally, the industry is under pressure due to competition for food waste from composting/anaerobic digestion operations in Northern Ireland. Another recent trend is that Irish waste operators are bio-stabilising mixed organic fines from the trommelling (mechanical treatment) of MSW. These bio-stabilised fines are of no value and while they have reduced landfill gas potential, they can only go to landfill. Also as most of the food waste is generated in the large urban areas, the larger composting sites need to be located close to the main urban areas. Current available national composting capacity should be utilised for the production of compost that has a value rather than the production of bio-stabilised waste that has little or no value.

Economies of scale may be barriers to Ireland having an indigenous recycling industry for other BMW components such as paper, cardboard and textiles.

3. The State should consider introducing landfill bans on certain types of materials

Landfill bans have the potential to instigate a significant change in waste management behaviours and should be considered carefully. However it is critical that in parallel with banning any materials, that a reasonable alternate route for management of that material stream is in existence, or is developed. In the absence of accessible, affordable alternative treatment routes, straightforward banning of certain streams from landfill is unlikely to work. There should be a genuine effort put into developing new solutions that aim further up the waste hierarchy than conversion of banned materials to SRF/RDF. Experience in Ireland with regards to mattress recycling demonstrates the employment/training opportunities that can be associated with such alternative treatment routes.

4. Explore how technical standards for a wider range of waste streams could be determined

Introduction of standards in this area would be useful and would assist in promoting usage of by-products & off-cuts as raw materials for other processors. EPA has good experience in working on best-practice for the waste sector and could be a valuable source of advice in progressing this action; the NSAI would also be an obvious partner.

European developments in this area should be carefully watched for implementation in Ireland.

5. Consider reclassifying higher-value commodity materials currently classified as waste through the development of quality protocols to encourage their marketability.

This development would be welcome. It should promote greater usage of discarded resources and allow easier transfer of these materials between holders. The EPA makes determinations on By-products and End-of-waste status notifications as per Articles 27 and 28 of the 2011 Waste Framework Directive Regulations. However this work could be more effective if:

1. There was more guidance available from the Commission on this work.
2. Local authorities could make decisions in this area. This could be achieved by a minor amendment to regulation.
3. The charging of fees to allow for resources to be put into the assessment of these applications.

6. Consider pre-treating waste for export to at least the same standard as UK Refuse-Derived Fuel (RDF) exports.

Firstly, it should be noted that the Environment Agency published a report in July 2015 called *Reasons for trends in English refuse derived fuel exports since 2010*³ and this stated that “Refuse derived fuel (RDF) can be defined as material that is produced from waste, has undergone some sort of treatment process, and is intended for use as a fuel. There is no single standard for RDF but end-users provide their own specifications based on calorific value, ash content and chlorine levels in the fuel.”

a. Should treatments be used on a mandatory or voluntary basis?

Very important to note that the Waste Shipment Regulation (WSR) is the piece of legislation that governs this area. The fact is that the legislation currently provides for movement of material with mandatory standards and any moves to introduce standards would need to be integrated with the WSR.

If there are outlets abroad that are willing to accept the quality MSW/RDF being produced in Ireland, then the export of the waste cannot be prevented in an open market unless other legal or financial instruments are in place. It is preferable that treatments would be on a voluntary basis with the incentive being in theory that a higher quality RDF/SRF can command a better price.

Every effort should be taken to extract metals from the MSW/RDF prior to going to incineration or WtE. Tromelling the waste to extract mixed organic fines just results in a little or no value waste stream that must undergo biostabilisation prior to going to landfill in any case. Life cycle analysis would need to be undertaken to assess the feasibility of taking out other recyclables such as plastic from the mixed waste prior to production of RDF/MSW. Some WtE plants have post-incineration technologies to extract metals from bottom ash. This metal recovery/recycling should be counted towards Ireland’s recovery/recycling targets (e.g. municipal waste, packaging waste). Such metal recovery/recycling is currently not captured when the residual waste is exported for treatment.

b. Are there any disadvantages to the introduction of such standards?

It may be difficult to monitor the quality of RDF/SRF being produced as sampling of such materials in general is undesirable due to health and safety concerns.

c. Is the proposal likely to create enterprise opportunities? If so, what kind?

It is difficult to say if increased production of RDF/SRF will create jobs at this point. Most of the large waste processing facilities are capable of changing their mechanical processing lines to produce outputs of varying types and so it is unlikely that any new facilities or high quality jobs would be developed as a direct result of increasing SRF/RDF production.

Ultimately, there must be foremost a sustainable demand (e.g. from cement kilns and municipal waste incinerators) for the RDF/SRF produced in Ireland if the waste exports are to be reduced.

One issue is that storage of the SRF/RDF results in greater fire risks as well as other nuisance such as odour issues, contaminated run-off issues.

The use of the RDF/SRF as fuel in Ireland will ultimately reduce Ireland's dependence external outlets for its use and will make the country more self-sufficient in terms of fuel and in terms of managing our waste in a sustainable and self-sufficient manner.

There may be increased business at ports if material is being exported.

9. Explore whether Regional Waste Management authorities could collate data on facility capacity and utilization, and treatment types from all waste management facilities on a quarterly basis to ensure current capacity information is available to market participants and policy makers.

a. Is there a demand for this information?

It is unlikely there would be significant change in authorised capacity on a quarterly basis, due to the lengthy processes for planning and authorising waste activities. It would however be useful to have these data compiled and made publically available annually. The Waste Management Plans 2015-2021 reported on authorised capacity in the regions, and it may be intended to update these data in the annual implementation reports on the plans. The data would need to be provided annually; however the method of collection and the validation of this data needs to be streamlined to ensure resources are utilised effectively by the regulators of waste activities. There is a demand for this information, including a legal requirement to report on number and capacity of certain recovery and disposal facilities (per NUTS2 region) under the Waste Statistics Regulation (No. 2150/2002).⁴

b. Is the information collectible?

It is not easy to report on 'capacity' at waste facilities. What exactly is to be measured? Is it the maximum tonnage of waste which is authorised to be accepted in a calendar year? The operational capacity? The operational capacity of primary treatment infrastructure onsite, or all treatment infrastructure? Built capacity?

The total quantity of waste the facility is authorised to accept in a calendar year is a coarse but useful measure and could be compared to the actual quantity accepted in a calendar year; however waste authorisations do not always specify a maximum tonnage to be accepted in a calendar year. In the Waste Management Plans 2015-2021, the lead authorities for the regions provided information on capacity based (in some cases) on the class of activity of the authorisations. This is not wholly satisfactory as not all classes of activity have tonnage thresholds, and many sites will never reach the maximum quantity specified (up to 50,000 tonnes for recovery operations).

More granular data on what types of waste a facility is authorised to accept (e.g. municipal, construction & demolition), and details of the waste treatment activities taking place at the site (apart from the high level class of activity they are authorised for) are not readily available in any existing database(s). It would need to be a requirement of waste authorisations to include a condition on the maximum tonnage waste to be accepted, have these data captured within the register of permits and then measure the actual tonnage accepted as part of annual reports; however the method of collection and the validation of this data needs to be streamlined to ensure resources are utilised effectively.

⁴ Capacity of energy recovery (R1) and waste incineration (D10) activities (tonnes/annum) and the residual capacity (m3) of landfills.

c. What are the possible outcomes from making this data available? If so, what kind?

Only some high level information is currently available (see b above). Consideration needs to be given about what data on 'capacity' and utilisation are needed for waste planning purposes and legislative reporting purposes and set up system(s) to capture the necessary information. In time, a national dataset would be in place and the outcome would be a very useful national resource for planners, industry, policy makers and regulators alike.

Some data, such as tonnage waste accepted in a calendar year, are not currently publically available (some licensees provide data in their annual reports, but not all) and are considered commercially sensitive. It may be necessary to provide aggregated data for public information.

10. Explore whether the Trans-frontier Shipment Office could provide data on export volumes and export types on a quarterly basis to allow early identification of new export trends.

a. Is this feasible and if so, what level of data granularity is required?

NTFSO currently make their register of notified waste shipments (amber list) and green list waste returns available on their website.⁵ Having quarterly data provided on shipments of waste could be useful to identify new export trends, subject to NTFSO agreeing this is feasible.

One disadvantage of the NTFSO data is that operators can include multiple List of Waste (LoW) entries in a waste shipment notification, to cover the different types of wastes they plan to export under that notification. In such cases, categorisation of the waste type exported is not highly accurate.

If data on export of baled municipal waste, RDF and SRF is of particular interest, operators need to be consistent in terms of LoW entry(ies) and descriptions reported in their waste shipment notifications so that the NTFSO register is easily filterable and searchable. Currently, operators use multiple LoW entries (19 12 10, 19 12 12, 20 03 01) and the descriptions don't always match the LoW entry used.

b. Is the proposal likely to create enterprise opportunities? If so, what kind?

It is probably sufficient to have annual data available to create enterprise opportunities as it is unlikely that the market could respond to opportunities as rapidly as quarterly given current waste legislative requirements.

13. Consider the development of a training programme for entrepreneurs and SMEs in the waste and materials recycling industries to encourage new entrants to the market and enable existing market participants to expand.

It is not clear if training as described would deliver changes. Most technical staff engaged in waste management companies already hold qualification relevant to their role. Companies may not be willing to release staff for training in this type of activity – which is generally seen as something to be handled by external contracts/consultants. There are many such external agents in the market at present.

However, there would be merit in putting greater emphasis in waste recovery and recycling in community-employment schemes (and other similar initiatives). This would be well-aligned with the

⁵ <http://www.dublincity.ie/main-menu-services-water-waste-and-environment-waste-and-recycling-national-tfs-office/ntfso-waste>

ambitions of the EU Circular Economy package. Such moves would complement changes proposed under Discussion Point #3.

14. Consider introducing specific and accountable targets for pre-treatment (as a proportion of household waste) for waste collectors.

a. Is this feasible? How might it be implemented?

Such targets could be useful, but will be difficult to meet unless enforceable through waste authorisations and/or economic incentives are in place for operators to direct waste. Waste collection operators report in their annual returns the first destination of the wastes they collect in each local authority functional area. EPA used these waste collection data to report on the treatment fate of household residual waste (National Waste Report for 2012, page 29), but it could be used for other waste streams (e.g. organic waste). It is difficult to track waste from source to final treatment due to mixing of wastes and multiple treatment/destination steps, but even to report on what percentage of wastes collected are directed first to a mechanical processing/final treatment facility rather than a waste transfer/bulking station is useful information regarding how waste is managed within existing infrastructure of the State.

b. How might targets reflect ambitions of the Regional Waste Management Authorities?

The Regional Waste Management plans have a target to reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill from 2016 onwards. The waste collection data referred to under (a) above will provide the data to check progress against this target. Unless there is an enforcement or economic incentive for directing waste, it may be difficult to achieve the target. The incentive must always be to apply the waste management hierarchy order, so that recovery is favoured over disposal, recycling over energy recovery etc.

c. Is the proposal likely to create enterprise opportunities? If so, what kind?

Pre-treatment targets could provide enterprise opportunities, if the waste industry felt that the targets were enforceable and achievable.

18: Examine the value of setting up an Irish organisation similar to the UK's WRAP.

Since its inception in 2004, Ireland's National Waste Prevention Programme (NWPP) has successfully delivered solutions for individuals and organisations who recognise the costs of wasteful consumption (both excess purchasing and final disposal charges); along with the critical need to manage our finite natural resources to maintain our quality of life into the future. Over the years the programme has evolved past an initial focus on preventing generation of solid wastes to a broader view of preventing wastage across materials, energy and water (primarily because of the integrated nature of relationships between each). The current strategy maps out Ireland's activities in this area up to 2020 and is titled *Towards a Resource Efficient Ireland*⁶.

The NWPP operates a suite of projects (with funding from Environment fund) which deliver and support resource efficiency initiatives. Some key projects include:

- *Green Business* – generating efficiencies and savings for Irish Business
- *Stop Food Waste* – supporting people to prevent food waste in their own homes
- *Green Enterprise* – supporting innovation for efficiency in business and the third sector;

⁶ <http://www.epa.ie/pubs/reports/waste/prevention/TowardsAResourceEfficientIreland.pdf>

- *Green Healthcare* – delivering significant savings for HSE facilities, expanding to private facilities.
- *Local Authority Prevention Network* – supporting and training local government to deliver resource efficiency and waste prevention for communities and local businesses.

EPA works closely with the DECLG to support and implement national policy on circular economy, resource efficiency and related issues. Through numerous contacts and through the National Waste Prevention Committee, EPA connects with stakeholders including government departments; SEAI; Bord Bia; Ibec; Irish Farmers Association; and many others to promote the benefits of resource efficiency. As the new regional waste management offices become more active, EPA looks forward to building on its existing strong working relationships with these organisations to further the ambitions of *Towards a Resource Efficient Ireland*.

These connections are further developed into Europe where EPA maintains good working relationships with partner organisations across Europe – including in the UK. For example in 2016, EPA joined with partners in 10 countries across Europe to make a proposal to form the European Resource Efficiency Excellence Centre.

Although the team delivering on *Towards a Resource Efficient Ireland* is modestly sized, it has consistently delivered programme of activities that is well-regarded across Europe and often cited as an example of good practice in the area. The impact of the NWPP is enhanced through the strong reputation of the EPA in business, government and the public; and through collaborative working with the EPA Research Programme (to deliver on an evidence base for actions).

The EPA welcome the clear interest in resource efficiency and the circular economy as propounded in the consultation document. While the goal to increase national focus on the circular economy is appropriate & welcome, the benefit of establishing an additional government agency is not clear. Essentially, it does not make sense to establish a new WRAP-type organisation in Ireland, when the EPA is already working successfully in this area through the NWPP.

The NWPP could develop into the areas of lifecycle thinking and product design (resource efficient products and end-of-life options). These life-cycle analysis and manufacturing design influence skills are currently not with EPA, and would have to be resourced. The link between the NWPP and RX3 work hosted by the Department could also be examined to determine where effectiveness and efficiency could be increased.

20. Consider what other policy or practical interventions, collaborations or alternative approaches might assist in Ireland's effort to become more resource efficient?

A key action to assist Ireland's effort to become more Resource Efficient would be the rapid publication and implementation of a National Resource Efficiency Plan. The plan should receive senior cross-government backing including direction and reporting to a cabinet committee. The plan should also set targets for reduction in material consumption to set a pace and to track progress. Appropriate supports to realising this national ambition could include:

- Expanded supports and mentoring on resource efficiency, eco design and waste prevention across all business sectors delivered through the National Waste Prevention Programme, or a similar organisation;

- Significant increase in research and development to assist Waste By-Product and end of waste determinations;
- Strong support for platforms facilitating swapping of fit-for-purpose good for reuse, both between individuals and business-to-business;
- Rapid and significant adoption of Green Public Procurement practices across central government, local authorities and the wider public sector;
- Implementation of a awareness campaign around resource efficiency to bring it to a similar level of consciousness for the general public as for energy efficiency;
- Provision of suitable financial supports to assist business to invest in efficiency - including soft (below-market rate of interest) financing;
- Development of a strong brand around the activity – similar to the approaches taken for ‘Healthy Ireland’ or ‘Resource Efficient Scotland’.

With specific reference to waste...

Waste is collected and managed primarily by the private sector, with the exception of some landfills and civic amenity/bring bank infrastructure which is managed by local authorities, and a small amount of market in household kerbside collection in two local authority functional areas.

The increasing landfill levy resulted in the market looking for alternative, cost-effective options for managing residual waste. With insufficient waste to energy capacity in the State, residual waste was exported for treatment and landfills closed. Regulators have no power to direct waste or to get information from operators on the details of their contracts with WtE operators abroad, so there is no information available to planners on how much waste is potentially going to be exported for energy recovery over the next 2-5 year period. Would there be scope for operators to provide some information on a confidential basis to the lead authorities for Waste Management Plans, to allow them to factor this information into planning?

There is the risk also that should export markets close to Irish exports, that until the capacity for WtE at the Dublin facility comes into effect in 2017 that residual waste would to be sent for disposal rather than energy recovery, which is going backwards in terms of treatment options on the waste hierarchy. Also there are only six landfills currently accepting municipal waste, and capacity at landfill is a significant issue should export markets fail, particularly at short notice. Perhaps once the WtE capacity currently under construction is operational, and is sufficient to meet waste management needs of the State, that a levy on export of residual waste for WtE treatment could be considered.

It would be useful if waste authorisations included a requirement for waste operators to report on the recovery/recycling efficiencies for particular waste sent for treatment abroad, where the data are required to fulfil legislative reporting obligations and meet targets set for Ireland for recovery/recycling. The legislative proposals under the Circular Economy Package are seeking to harmonise calculation methods for reporting of recycling rates across Member States, to improve the quality and reliability of recycling statistics that inform EU targets. It is therefore imperative that where Irish waste is exported for treatment that there are reliable records and reporting of its treatment to inform legislative reporting obligations.