WASTE MANAGEMENT PLAN FOR THE MIDLANDS REGION

2005-2010 REPORT ON CONSULTATION

February 2006
TABLE OF CONTENTS

1 INTRODUCTION.............................................................................................................................. 1

2 CONSULTATION COMPONENTS.................................................................................................. 2
   2.1 INTERNET ........................................................................................................................ 2
   2.2 ADVERTISING AND MEDIA ............................................................................................ 2
   2.3 SUMMARY GUIDE ......................................................................................................... 3
   2.4 VIEWING/PURCHASING THE PLAN ................................................................................ 3
   2.5 LAUNCH .......................................................................................................................... 3
   2.6 STRATEGIC ENVIRONMENTAL ASSESSMENT......................................................... 4
   2.7 PRESENTATIONS ............................................................................................................ 4
   2.8 STATUTORY OBLIGATIONS............................................................................................. 4

3 WRITTEN SUBMISSIONS............................................................................................................... 5
   3.1 PREVENTION AND MINIMISATION ............................................................................. 5
   3.2 AWARENESS AND COMMUNICATION ...................................................................... 6
   3.3 COMMUNITY INVOLVEMENT ..................................................................................... 7
   3.4 ZERO WASTE ............................................................................................................... 8
   3.5 WASTE ARISINGS ......................................................................................................... 8
   3.6 RECYCLING ................................................................................................................... 11
   3.7 HAZARDOUS WASTE ................................................................................................. 13
   3.8 ORGANIC WASTE ....................................................................................................... 13
   3.9 PACKAGING ................................................................................................................... 14
   3.10 CONSTRUCTION AND DEMOLITION WASTE ....................................................... 15
   3.11 AGRICULTURAL WASTE ........................................................................................... 18
   3.12 INFRASTRUCTURE/FACILITIES ............................................................................... 19
   3.13 MECHANICAL BIOLOGICAL TREATMENT ............................................................ 19
   3.14 WASTE TO ENERGY ................................................................................................... 21
   3.15 LANDFILL ISSUES ..................................................................................................... 24
   3.16 CONTINGENCY ............................................................................................................. 26
   3.17 DIRECTING WASTE .................................................................................................... 26
   3.18 UNCOLLECTED WASTE ............................................................................................. 27
   3.19 WASTE PERMITS ........................................................................................................ 27
   3.20 ECONOMIC INSTRUMENTS ....................................................................................... 28
   3.21 ROLE OF THE PRIVATE SECTOR ............................................................................ 29
   3.22 STEERING GROUP ...................................................................................................... 32
   3.23 TARGETS/SCENARIOS/INDICATORS ..................................................................... 32
   3.24 IMPLEMENTATION ....................................................................................................... 33

4 RECOMMENDATIONS FROM SEA.............................................................................................. 34

5 FEEDBACK FORMS .................................................................................................................... 39
LIST OF TABLES

Table 2.1 List of Local Papers Advertising the Statutory Notice ............................................................. 2
Table 2.2 Presentations Made to Local Authority Meetings.................................................................... 4

APPENDICES

APPENDIX A                Statutory Notice

APPENDIX B                List of Submissions & Feedback Forms
1 INTRODUCTION

This report forms part of the statutory process for the review or replacement of a Waste Management Plan as required by the Waste Management Acts 1996–2003. Section 23 of the Act states that a minimum 2-month period for receipt of written submissions on the Proposed Replacement Waste Management Plan must be advertised and copies of the Plan submitted to the Minister, the Environmental Protection Agency (EPA) and prescribed bodies. The Proposed Replacement Plan must be made available for inspection or for purchase during this period.

The purpose of the report is:

- To report on the written Submissions/Feedback Forms received during the public display of the Proposed Replacement Waste Management Plan and associated non-statutory Strategic Environmental Assessment (SEA) for the Midlands Region 2005-2010
- To set out the responses to the issues raised in the Submissions/Feedback Forms
- To make recommendations on changes to the Proposed Replacement Waste Management Plan, where appropriate.

The report contains four main parts:

1. Overview of the consultation components that took place in the two month public display period
2. A summary of the issues raised in the written submissions and the recommendations of the Midlands Region Waste Management Steering Group to the issues raised
3. An analysis of the Feedback Forms
4. A list of the persons or bodies who sent in written submissions/Feedback Forms.

The layout of this report follows that is that each issue is dealt with in order of the waste management hierarchy, where possible for ease of reference.

17 written representations and 17 feedback forms were received during the two-month consultation period. Several organisations made the same submission to each Local Authority however where this is the case they have been counted as one submission.

The five Local Authorities wish to express their appreciation to those who made submissions, viewed the displays and purchased or downloaded the Proposed Replacement Waste Management Plan and SEA.

Following completion of the public consultation stage, a Draft Report on Consultation was prepared taking into account the submissions made. This report responded to all issues raised and recommended changes to the Plan were outlined therein. The changes recommended in this report were presented to the elected members of each Local Authority at council meetings in December 2005 and January 2006. The questions raised during the presentations were noted and considered by the Steering Group prior to approval of the final changes for the Waste Plan.

The replacement Waste Management Plan for the Midlands Region 2005-2010 was formally made by the County Manager of each Local Authority on 1st February 2006.

As part of the SEA process a ‘Statement’ was also published and summarises how environmental considerations have been integrated into the Plan. This is now available along with the SEA Scoping Report and Environmental Report.
2 CONSULTATION COMPONENTS

In accordance with statutory requirements, the Proposed Replacement Waste Management Plan was available to the public for comment from July 25th to September 30th, 2005. Publicity included: publication of the Plan and SEA on the internet, newspaper advertising, posters, display panels in each Local Authority office and a Summary Guide which was made available to the public and other interested parties. The complete Proposed Replacement Waste Management Plan and a bound Executive Summary were also put on display. Details of each component are given below.

2.1 INTERNET

The Proposed Replacement Waste Management Plan, the Executive Summary and the Summary Guide were available to read or to be downloaded on each of the Local Authority websites.

2.2 ADVERTISING AND MEDIA

The Statutory Notice was placed in the Irish Independent on Monday July 25th 2005 and a copy of the notice is included in Appendix A. This notice advised the public that the five Local Authorities had prepared a Proposed Replacement Waste Management Plan, where and when the plan could be inspected and that written representations could be made to each Local Authority. The same notice was also placed in local papers on the weekend ending July 29th 2005 see Table 2.1

Table 2.1 List of Local Papers Advertising the Statutory Notice

<table>
<thead>
<tr>
<th>Newspaper</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laois Nationalist</td>
</tr>
<tr>
<td>Leinster Express/Offaly Express</td>
</tr>
<tr>
<td>Offaly Independent</td>
</tr>
<tr>
<td>Midlands Topic/Offaly Topic</td>
</tr>
<tr>
<td>Midland Tribune</td>
</tr>
<tr>
<td>Tipperary Star</td>
</tr>
<tr>
<td>Nenagh Guardian</td>
</tr>
<tr>
<td>Westmeath Independent</td>
</tr>
<tr>
<td>Westmeath Examiner</td>
</tr>
<tr>
<td>Longford Leader</td>
</tr>
<tr>
<td>Longford News</td>
</tr>
</tbody>
</table>

Posters (see above) advertising that the Proposed Replacement Waste Management Plan was available for viewing, and encouraging the public to send in a submission on the Plan, were placed in libraries, recycling centres and Local Authority offices.

Four display panels (see page over) were also provided to each Local Authority to assist in displaying the Proposed Replacement Waste Management Plan within their Offices and they were also used at the official launch of the Proposed Replacement Waste Management Plan.
2.3 SUMMARY GUIDE

Summary Guides outlining the Waste Management Plan Review process, what had been achieved since the original Waste Management Plan and what is proposed for the next five years were available for free from all Local Authority offices, libraries, recycling centres and online through the Local Authority websites.

2.4 VIEWING/PURCHASING THE PLAN

The Proposed Replacement Waste Management Plan was available for viewing at all Local Authority offices and libraries. The Plan could also be purchased in hard copy for €40.00 or on CD for €5.

2.5 LAUNCH

The Proposed Replacement Waste Management Plan was launched on July 11th, 2005 at the Tullamore Court Hotel in Co. Offaly. The Elected Members and Strategic Policy Committee (SPC) members from the five Local Authorities and the local and national media were invited to attend. Approximately 70 people attended from the Region. All Elected Members and SPC members subsequently received a copy of the Proposed Replacement Waste Management Plan.
2.6 STRATEGIC ENVIRONMENTAL ASSESSMENT

The Midlands Local Authorities were invited by the Department of Environment Heritage and Local Government to pilot the Strategic Environmental Assessment Process (SEA) in its review of the Midlands Waste Management Plan on a non-statutory basis as the review of the Waste Management Plan commenced before the SEA legislation was enacted. SEA is a process for evaluating at the earliest appropriate stage the environmental quality and consequences of policies, plans, programmes or initiatives. The purpose is to ensure that the environmental consequences of plans or programmes are assessed during their preparation and before they are adopted. The completed SEA Report was on display in each of the Local Authority Offices or available to read or download on each of the Local Authority websites for the 2 month consultation period. No written representations were received on the SEA Report. However the recommendations of the Environmental Report issued as part of the SEA process have been considered during the consultation process and are discussed in Section 4.

2.7 PRESENTATIONS

In addition to the joint launch on 11th July 2005 (see Section 2.5 above) RPS made presentations to the following Council meetings. The questions and discussions that took place were noted and have been taken into consideration in this consultation process.

Table 2.2 Presentations Made to Local Authority Meetings

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offaly County Council</td>
<td>18th July</td>
</tr>
<tr>
<td>Westmeath County Council</td>
<td>25th July</td>
</tr>
<tr>
<td>Longford County Council</td>
<td>20th July</td>
</tr>
<tr>
<td>North Tipperary County Council</td>
<td>18th July</td>
</tr>
<tr>
<td>Laois County Council</td>
<td>25th July</td>
</tr>
</tbody>
</table>

2.8 STATUTORY OBLIGATIONS

For the purposes of Section 23 (1) of the Waste Management Acts 1996-2003 Offaly County Council as the lead Local Authority submitted a copy of the Proposed Replacement Waste Management Plan for the Midlands Region to the following:

- Minister for Community Rural and Gaeltacht Affairs
- Minister for Communications Marine and Natural Resources
- Minister for Arts Sport and Tourism
- Minister for Department of Environment Heritage and Local Government
- Bord Failte
- Teagasc
- An Taisce
- EPA
- Any Local Authority whose functional area adjoins that of the first mentioned Local Authority (Roscommon County Council, Meath County Council, Galway County Council and Kildare County Council).
3 WRITTEN SUBMISSIONS

A total of 17 written submissions were received during the two-month consultation period. Several organisations made the same submission to each Local Authority however where this is the case they have been counted as one submission. A list of those who sent in submissions is provided in Appendix B.

This report will address the issues raised in the written submissions and respond to them. If changes are to be made to the Proposed Replacement Waste Management Plan as a result of the public submissions the recommendations will state the exact amendment to be inserted into the Replacement Waste Management Plan, and be shaded in a Green Box as shown.

<table>
<thead>
<tr>
<th>Recommended Plan Change:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Details of Plan change..........................</td>
</tr>
</tbody>
</table>

The Proposed Replacement Waste Management Plan will hereinafter be referred to as ‘the Plan’.

3.1 PREVENTION AND MINIMISATION

Issues:

The submissions expressed concern that the Plan has not adequately acknowledged the role of prevention and minimisation within the integrated approach to Waste Management in the Midlands Region. It is felt that there should be greater emphasis on setting targets and objectives for prevention, minimisation and the exchange reuse and repair of discarded or unwanted materials and goods.

The proposed formal waste audit of the Local Authority offices to assess current in-house waste prevention/minimisation practices was considered by one submission as a ‘waste of time’ and that best practice would suffice.

Several submissions were supportive of the proposed Green Business Officers and believe they are crucial appointments that should not be delayed.

One submission believes it would make sense to significantly increase efforts to reduce, reuse and recycle, and examine their effectiveness, before a major investment with long term implications is made in a thermal treatment facility. Such a facility could reduce the incentive for people to reduce, reuse and recycle.

Response:

Chapter 4 covers Waste Prevention in the Plan and specific policy objectives and targets on prevention during the life of the Plan are set out in Chapter 16. Section 16.2 outlines in detail waste prevention policy for the Region over the Plan period. The Environmental Awareness Officers (EAOs) will continue to focus on delivering waste prevention programmes at the household, school and community level. The proposed appointment of Green Business Officers will target prevention of commercial and industrial waste. Waste prevention has also been built into the objectives and targets for C&D and priority wastes.
Recommended Plan Change:

The following (in italics) will be added to Section 17.1 C&D Waste Planning:

Ensure that for new construction or demolition projects above the threshold limits as set by the NCDWC, a C&D waste management Plan is prepared by the developer and that the maximum amount of waste material generated on site is prevented reused and recycled.

3.2 AWARENESS AND COMMUNICATION

Issue:

A submission from transition year students in Co. Westmeath acknowledge that schools in the Midlands Region are contributing to the waste generation problem, however the “students are the citizens and leaders of tomorrow, if they are educated to control and manage waste the need for landfill and incineration will be greatly reduced in the future and by communicating with the schools the message will make its way into the wider community”. In order to make the most of this captive audience the submission suggests that:

- Compost bins be provided to all schools
- A bring centre is located on all school grounds
- Additional EAOs are employed to work with the schools
- Greater recognition of the achievements of the schools registered in the Green Schools programme is needed.

One submission notes that it is often women who are seen recycling, and suggests a campaign targeting men may be useful to increase the amount of male recyclers!

The An Taisce submission provides practical steps that could be taken at both local and regional level to encourage waste minimisation, they include:

- Networks for exchanging information, technical advice, materials, objects for reuse etc.
- Appointing sustainable waste management advisers to advise on recycling schemes and projects

Response:

Chapter 4 of the Plan provides details of the current status of the An Taisce Green Schools Programme in the Region. It is reported that 184 schools are participating in the Programme and 37 have been awarded the Green Flag. The Green Schools Programme is a National Campaign, which will continue to be supported and promoted by the Local Authorities during the Plan period. The point made in relation to students is valid and the comments are useful.

The Plan supports the development of Community based Recycling Schemes through the role of the Environmental Awareness Officers who can advise communities on recycling schemes. Existing schemes such as the Adopt a Bring Bank Scheme and the Litter Management Scheme have been developed in the Region. It is expected that the development and expansion of the networks through the Region will continue to grow during the Plan supported by the Local Authorities.
Recommended Plan Change:
The following in italics will be added to Section 16.2.1:
“16.2.1 Household Community and School Level”
The following objectives will be added to 16.2.1:
“The Green Schools Programme will continue to be supported and developed by the EAOs.
The EAOs will support and assist community groups wanting to set up/run sustainable community recycling initiatives.”
The following in italics will be added to the targets in Section 16.2.1:
The promotion and roll out of home composting to 20,000 householders, Community Groups and Schools in the Region by 2009.
“By the end of 2009 each Local Authority will assist in the development of a sustainable community-led recycling initiative.”
The following objective will be added to Section 16.4.1.
“A similar ‘Adopt a Bring Bank’ scheme will be piloted in schools within the Region by 2007.”

3.3 COMMUNITY INVOLVEMENT

Issue:
An Taisce advocates that local communities should be encouraged to take responsibility for their own wastes. They suggest that reuse, repair and recycling initiatives should be undertaken by communities, acting as not-for profit companies and linked to a wider network of organisations. To be successful this will require

- Guidance and leadership from Local authorities and Government
- Financial assistance (Environment Fund and National Development Plan)
- Recognition by the proposed National Waste Management Board and the Proposed Recycling Consultative Forum
- Provide practical assistance to local recycling, composting and other forms of sustainable community waste management i.e. encouraging ‘grassroots’ recycling initiatives.

Response:
A number of initiatives will continue to be supported by the Local Authorities as vehicles for promoting community involvement in waste prevention, recycling schemes and community waste management. These include Local Agenda 21, Race Against Waste and Tidy Towns campaigns etc. The EAOs will continue to be active in liaising with the community and the introduction of the proposed Green Business Officers will allow them to focus more widely on community initiatives.

Recommended Plan Change:
No Plan Change
3.4 ZERO WASTE

Issues:

An Taisce submission strongly endorses the principle of Zero Waste and believes it should be the policy of the Plan as the philosophy promotes an integrated whole-system approach to addressing the problems of society’s unsustainable resource flows and it encompasses waste elimination at source through product design and producer responsibility together with waste reduction strategies further down the supply chain.

Response:

Throughout the consultation process many submissions believed that the ‘Zero Waste’ model should be adopted throughout the country as has been done in New Zealand, South Australia, United States and Canada. Zero Waste is a holistic policy on which there has been much focus in recent times.

The Zero Waste philosophy has been interpreted as ‘zero waste generation’ as opposed to its true aim which is ‘zero waste to disposal’. Zero Waste includes ‘recycling’ but goes beyond recycling by taking a ‘whole life’ approach to the flow of resources and waste through society and focusing on resource management, sustainable product design and setting as its aim zero waste to disposal by moving management of waste up the hierarchy. Zero Waste to disposal minimises waste generation, maximises recycling, reduces consumption and ensures that products are made to be reused, repaired or recycled back into nature or the marketplace. A zero waste philosophy accepts that there will be a steadily shrinking residue of waste requiring disposal for some time into the future and that landfills, as a means of waste disposal will gradually be phased out.

The Midlands Waste Management Plan acknowledges that the Zero Waste to disposal model is a long-term goal that the Region should work towards. The Plan supports this general approach to waste management by setting extensive waste prevention and minimisation objectives and targets, and focuses on managing waste higher up the waste hierarchy. It does however also recognise the need to develop infrastructure to meet the residual waste management needs of the Region in the short to medium term.

Recommended Plan Change:

The following will be added to Section 15.9:

“Zero Waste is a holistic policy on which there has been much focus in recent times. The Zero Waste philosophy has been interpreted as ‘zero waste generation’ as opposed to its true aim which is zero waste to disposal. The Zero Waste policy focuses on a whole life approach to the management of waste focusing on resource management, sustainable product design and setting as its aim zero waste to disposal by moving the management of waste up the hierarchy. The Plan supports this general approach to waste management but also recognises the need to develop infrastructure to meet the residual waste management needs of the Region in the short to medium term. The Plan has adopted an integrated strategy to deliver ambitious recycling targets whilst minimising the need for landfill in the Region. In addition the Plan has set extensive waste prevention and minimisation objectives and targets and is focused on delivering treatment solutions up the waste hierarchy.”

3.5 WASTE ARISINGS

Issue:

A number of issues were raised by Greenstar regarding references to waste data throughout the Plan including the following:

- Difference in household waste produced per capita across the region.

- Clarification required as to whether ‘Total Arisings’ in Table 9.1 includes ‘Total Recycled’.

- Comment on the perceived decrease in household and commercial waste arisings for the Midlands Region as indicated by comparison of National Waste Database for 2001 and 2003.

- Clarification of Table 6.7, e.g. commercial tonnage exceeds that presented in Table 6.1 and other waste streams not represented in household waste

- The Plan should contain a detailed description of the projected household and commercial and industrial waste arisings for the period 2005 to 2010 as well as the predicted longer term trend as presented in Figure 13.2

- Discrepancies in household and commercial waste arisings for each county as presented in the NWD, e.g. 5,444 tonnes of commercial waste generated in County Offaly during 2003 compared to 13,000 tonnes for County Longford, despite County Offaly having more than double the population.

- More clarity needed on the description of Industrial Waste Arisings, particularly on what constitutes municipal-type industrial waste and a distinction between process and non-process industrial waste. Industrial waste per county should be indicated.

- Prior to the adoption of the full plan, there should be a greater degree of confidence that the figures as presented in relation to household, commercial and industrial waste, represent the most realistic and up-to-date information available. If necessary adoption of the plan should be deferred to allow for the inclusion of more up-to-date, accurate waste arising figures.

- Circular WIR 06/04 issued by the Department of the Environment Heritage and Local Government recognises the importance of ensuring that accurate and up to date waste arising figures are included in waste management plans. The submissions recommend that 2004 data be used where possible in the preparation of the new Plan, which will cover the period 2005 to 2010.

- Discrepancies between data on uncollected household waste presented in the Draft Plan and that published in the NWD for 2003?

- Evidence required that in excess of 26,000 tonnes of waste is brought by householders directly to landfill. An estimate of the tonnage of material that is being disposed of illegally or through backyard burning should be provided in the Plan.

**Response:**

The data on which the waste arisings in the Plan are based are primarily those supplied to the EPA during the preparation of the National Waste Database (NWD 2003). However the data gathering carried out during the preparation of the Plan was more extensive than that for the NWD and was supplemented by additional information from Waste Licences, Waste Permits (Facility and Collection) and also from discussions with the Local Authority offices involved in the waste area. Where required the data has been corrected and modified to rectify any obvious anomalies or to reflect local knowledge and conditions.
There may still be inconsistencies in the data presented, for example in the quantities of Commercial and Industrial Waste where some waste collectors do not differentiate between Commercial Waste and ‘municipal-type’ non-process Industrial Waste. However it is still the best available information at this time. On this basis, although there may still be some uncertainties in some aspects of the data, the waste quantities in the Waste Plan are considered to be more accurate than those in the NWD (2003).

In this regard the submission from the EPA itself acknowledges the difficulties faced by Local Authorities regarding the collection of consistent quality data. The EPA welcomes the proposal in the Waste Plan for a review of the current recording systems with a view to standardising the way that figures are collected and reported in the region.

Recommended Plan Change:

The following changes will be made in light of the comments received on waste arisings:

The miscalculation identified in Table 6.7 will be amended, change highlighted in italics, to reflect (a) ‘Other Waste Streams’ for household waste and (b) amend figures for Commercial waste to make it consistent with Table 6.1.

Table 6.7: Waste Compositional Quantities for Household and Commercial Waste

<table>
<thead>
<tr>
<th>Waste Stream</th>
<th>Household Waste (Tonnes Per Annum)</th>
<th>Commercial Waste (Tonnes Per Annum)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organic</td>
<td>36,336</td>
<td>13,435</td>
<td>49,771</td>
</tr>
<tr>
<td>Paper</td>
<td>24,981</td>
<td>31,348</td>
<td>56,329</td>
</tr>
<tr>
<td>Plastics</td>
<td>13,626</td>
<td>6,399</td>
<td>20,025</td>
</tr>
<tr>
<td>Glass</td>
<td>4,542</td>
<td>4,478</td>
<td>9,020</td>
</tr>
<tr>
<td>Metal</td>
<td>4,542</td>
<td>1,919</td>
<td>6,461</td>
</tr>
<tr>
<td>Textiles</td>
<td>4,542</td>
<td>640</td>
<td>5,182</td>
</tr>
<tr>
<td>Others</td>
<td>24,981</td>
<td>5,760</td>
<td>30,741</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>113,550</strong></td>
<td><strong>63,996</strong></td>
<td><strong>177,546</strong></td>
</tr>
</tbody>
</table>

The following sentence on Industrial waste arisings in Section 6.2.3 will be amended as shown in italics.

“This figure is primarily waste generated from industrial activities and can include sludges, processing waste and municipal type industrial waste which is reported through the Local Authority waste collection and waste facility permit systems.”

In addition Table 10.1 will be altered to include the quantity of municipal type industrial waste landfilled in the Region in 2003. Refer to the Non-Hazardous Industrial Waste quantities.


<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Household Waste</td>
<td>80,432</td>
<td>86,126</td>
</tr>
<tr>
<td>Commercial</td>
<td>26,011</td>
<td>28,629</td>
</tr>
<tr>
<td><strong>Non-Hazardous Industrial Waste</strong></td>
<td>16,352</td>
<td>8,387</td>
</tr>
<tr>
<td>Other</td>
<td>27,315</td>
<td>18,642</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>150,110</strong></td>
<td><strong>141,784</strong></td>
</tr>
</tbody>
</table>
The following sentence in italics will be added to the last paragraph in Section 10.1.1:

“…………About 28% of the total household waste disposed of to landfill is uncollected waste and is brought for disposal by householders directly to the four Regional facilities. This figure has been calculated using household data from Landfill AERs and mixed waste collected by private waste contractors.”

The following in italics will be added to the end of the last paragraph in Section 6.2.1

“There remains a significant quantity of material that is being disposed of illegally or through backyard burning and this is estimated to be approximately 9-10% of the total household waste arisings.”

### 3.6 RECYCLING

**Issue:**

One submission requested that the Local Authorities implement a dry recycling programme for households whereby each household segregates their waste into 6 categories into colour coded bins, (bins to be provided at a subsidised rate by the Local Authorities) and collection points for drop off would be located around the Region.

**Response:**

Source separated collections of dry recyclables has been rolled out in the Region to over 29,000 householders as outlined in Chapter 7 ‘Current Waste Collection Services’. The current two-bin system allows both householders and businesses to separate out dry recyclables i.e. paper, cardboard, plastic, Tetrapak, aluminium cans, food tins etc from the general mixed waste stream.

The current scheme will be expanded upon during the lifetime of this Plan and a third bin will be introduced in the Region for the collection of organic kitchen and garden waste. The development of the three-bin collection system for the Region is in compliance with the preferred Strategy as set out in the Draft National Biodegradable Waste Strategy (2004). Details of the waste collection policy, objectives and targets for the Region are outlined in Section 16.3 of the Plan.

**Recommended Plan Change:**

No Plan Change

**Issues:**

The following additional points with respect to recycling in the Midlands were raised in the submissions:

- The lack of a civic amenity site in Thurles that takes a wide range of material needs to be addressed in the Plan.
- Civic Amenity Sites need to better communicate to the public what materials they can and cannot accept.
- The range of materials accepted at Civic Amenity Sites should be increased e.g. LDPE, polypropylene, plastic film packaging and polystyrene.
• The frequency of emptying bring banks could be increased and all shopping centres to have paper, glass and plastic bottle recycling banks onsite.

• Opening hours at recycling centres to be extended once a week.

• Assistance should be provided to firms which will provide a local market for recycled materials, thereby creating further employment and insulating the waste recyclers from the vagaries of commodity markets.

• Establish Resource Recovery parks or ‘Ecoparks’ as the community replacement facilities for landfills, these facilities should include reuse, recycling and composting businesses close together and can become the core of a comprehensive strategy for local resource management.

• The creation of a significant and stable market for recyclable materials

• Bring in ‘differentiated taxation’ according to the environmental performance of products e.g. apply reduced VAT rates on products carrying the European eco-label, supplemented by the development and use of other environmental taxes and charges, tradeable permits etc. Regulations requiring all producers or importers of goods which are made from raw materials to pay a levy based on the type and proportion on the raw material in the finished product.

Response:

There are currently 9 Civic Amenity Facilities in operation in the Midlands Region and during the Plan period the existing network infrastructure and services will be expanded across the Region.

An additional 6 Civic Amenity Facilities will be provided by 2010, 2 of which will be located in North Tipperary. Thurles, Roscrea and their environs will be considered as potential locations in future siting studies.

The Local Authorities will continue with a high level of public communication of civic amenity facilities and will ensure sufficient awareness information is provided and accessible through all local council offices, websites and appropriate media. Adequate signage for all facilities will also be maintained.

Additional Civic Amenity Facilities are to be provided over the Plan period and the Local Authorities will endeavour to ensure that other materials not catered for in the door-to-door collection will be accepted at these facilities.

The Region has a distribution of over 180 bring banks across the Region exceeding the original target of 174 as set in the original Midlands Waste Plan in 2001. The expansion of the existing network will continue and bring banks will continue to be serviced regularly.

The proposed appointment of Green Business Officers in the Region will target waste prevention and minimisation at the commercial and industrial level. The proposed GBOs will also assist in the development of sustainable markets with regard to recycling of waste material from the commercial and industrial level.

The introduction of differentiated taxation would require implementation at a national level and is not within the scope of the Regional Waste Management Plan.

Recommended Plan Change:

The following objective will be added to Section 16.4.1:

“The opening hours of Civic Amenity Facilities will be extended to cover weekends/outside normal work hours where local conditions allow.”
3.7 HAZARDOUS WASTE

Issue:

Whilst the Plan has stated that civic amenity centres and mobile collections for hazardous waste from households and small businesses will be provided, this should be kept under review in case the services fail to deliver adequate quantities of hazardous waste. It may prove necessary to employ services with a broader reach, such as segregated kerbside collection services to ensure the greatest possible quantity of household hazardous waste is accounted for.

Response:

In parts of the Midlands Region there are intermittent mobile services for the collection of household hazardous wastes in operation and these are planned to continue. In addition Civic Amenity Facilities in the Region accept a wide range of household hazardous wastes for recycling.

Recommended Plan Change:

The following will be added as Objectives to Section 16.3:

“The Midlands Local Authorities will investigate the provision of a yearly collection of household hazardous waste.”

“The National Hazardous Waste Management Plan (NHWMP) is currently under review. The Midlands Plan will continue to have regard to the recommendations of the replacement NHWMP Plan.”

3.8 ORGANIC WASTE

Many of the submissions including the majority of those from the Mount Mellick Environmental Group expressed their support for the brown-bin for the collection of organic waste. One submission expressed concern over the proposal to roll-out 20,000 home compostor bins. There is no performance indicator to demonstrate how successful these units actually are and more importantly no information as to how reliable householders are in continuous use of the home compostors. The submission suggests that a study into the efficacy and success of home compost bins be carried out prior to this roll-out.

One submission requests clarification within the Executive Summary as to what exactly the proposal is regarding the integration of the proposed development of home composting/organic waste collection/biological treatment and Civic Amenity sites accepting green waste.

Response:

In conjunction with the roll-out of home composters the EAOs will continue to support the programme with educational information to ensure that all recipients are aware of how to use a home compost bin properly and effectively.

The plan proposes to provide a third bin for the collection of kitchen and garden waste from households and businesses and the collected material will be treated at a Licensed or Permitted facility. Those households without a collection service or with additional garden waste can deliver their material to selected Civic Amenity Facilities.

Recommended Plan Change:

No change
3.9 PACKAGING

Issue:
In terms of shared producer responsibility Repak believes it is currently carrying an unfair burden. Repak members are responsible for 60% of the packaging placed on the market, yet Repak are deemed responsible for the achievement of national packaging recycling targets.

The Repak submission questions the reference to producer responsibility initiatives in other EU countries – which EU countries? Repak believes it is not true to say that the full cost recovery model is the common model of compliance schemes applied throughout the EU member states.

The proposal in the Plan for Repak to fund the full cost recovery of packaging waste is an issue of some concern to Repak. The submission outlines that it would require an immediate fee increase of at least 50% followed by annual increases over the next six years, which would undermine and jeopardise the Repak scheme.

Response:
It is acknowledged that Repak members are not responsible for all packaging placed on the Irish Market, and as such the policy text in relation to cost recovery will be amended.

There is no reference to other producer responsibility initiatives in other EU countries.

Recommended Plan Change:
The following in italics will be added to the objectives in section 16.13:

“Objective:
The full cost of collection, sorting and recycling of packaging waste – less the revenue from recyclables – will be recovered from producers of packaging materials as defined in the Waste Management (Packaging) Regulations 2003, as amended.”

Issue:
One submission suggests that the Local Authorities should increase efforts to work with the manufacturers of products and packaging that lead to waste e.g. supermarkets display information on the packaging materials used on all products and give details as to where the packaging can be brought for recycling.

There is no mention in Section 8 that Major Producers must provide facilities for the return of packaging waste as required by the EU waste Packaging Directive (94/62/EC).

Response:
Working with manufacturers is within the remit of the proposed Green Business Officers as outlined in Section 16.2.3.

In Section 8.2.2 it states “To self-comply with the regulations, Major Producers must fix a notice in the premises stating that packaging will be accepted, free of charge for the purpose of recovery.” Major Producers who are members of REPAK are not obliged to take back packaging waste.

Recommended Plan Change:
No change
3.10 CONSTRUCTION AND DEMOLITION WASTE

Issue:

Several submissions expressed concern over the Local Authorities reluctance to rely upon the information provided by permit holders in deriving C&D recovery rates for the region. The submissions believe it is essential that the Local Authorities develop the permitting system and C&D management in their areas such that a satisfactory level of enforcement at site level is achieved and also that adequate and accurate records are maintained as to the nature and quantity of waste deposited at permitted sites.

The Plan proposal that the Local Authorities will implement the waste management planning guidelines for C&D projects is welcomed in the submissions and it is suggested that in order to ensure accurate reporting and recording of actual waste generation the Local Authorities will need to request reports from developers and contractors on a periodic basis to cross-check with the data provided in waste permits and waste collection permits.

Response:

The comments are noted and the Local Authority aim to improve waste data collection for C&D waste generated in the Region. The NCDWC Voluntary Industry Initiative allows Local Authorities to use the planning process to require developers to deliver pre-planning C&D Waste Management Plans if the proposed development exceeds specific threshold limits. The Local Authorities will use this mechanism to improve data collection from sites and will require developers to keep records of data generated on site and submit a final report upon completion of construction.

Recommended Plan Change:

The following will be added to the Planning Objectives in Section 17.1:

“Local Authorities will require Developers/Contractors to report on waste movements in to and out of the site as outlined in the C&D Waste Management Plan in line with relevant planning legislation and the objectives of the NCDWC Voluntary Initiative.”

Issue:

The submissions would support any proposals to utilise uncontaminated C&D waste for recycling and reuse as alternatives to virgin materials in order to eliminate the quantities of recyclable waste used in land recovery.

Several submissions expressed concern over the lack of provision of C&D recycling facilities and processing in the region considering that C&D waste generation is expected to increase to 450,000 tonnes over the life of the Plan.

Response:

The Plan has identified the need for additional C&D Waste Processing Facilities in the Region and will engage with the construction industry/private sector to ensure the necessary facilities are put in place by the end of 2008.

Recommended Plan Change:

No change
Issue:

The submissions suggest that the 9 existing Civic Amenity sites and the 3 sites currently under construction around the region should provide for the recovery of C&D waste from households (DIY project etc.) and small businesses. The submissions also propose that a network of ‘bring centres’ is established throughout the Region that will cater for small quantities of C&D and DIY waste.

Response:

The Local Authorities note the submission on expanding the materials accepted at Civic Amenity Facilities and where conditions allow intend to expand the current range of items.

Recommended Plan Change:

The following in italics will be added to Objectives in Section 16.4.1

Existing and proposed Civic Amenity Facilities will, where possible, accept a wider variety of materials specifically WEEE, green waste, household hazardous waste and household C&D waste.

The following in italics will be added to the Waste Facilities objectives in Section 17.1

Existing and proposed Civic Amenity Facilities will, where possible, accept a wider variety of materials specifically WEEE, green waste, household hazardous waste and household C&D waste.

Issue:

The submissions suggest that the current target of 80% recycling of C&D waste be increased to 85% to reflect the targets outlined in Changing Our Ways and suggest removing the detail from Table 15.1

Response:

Table 15.1 of the Plan relates to historical targets set out in the first Midlands Waste Plan (2001). It is recognised that the current national recycling target for C&D Waste is 85% as set out in Changing our Ways (1998) and this is acknowledged in Section 17.1 of the Plan.

Recommended Plan Change:

No change

Issue:

C&D waste infrastructure is not addressed in Section 16.6 of the Draft Plan which describes the policies with regard to Materials Recovery Facilities/Waste Transfer stations. The submissions believe that it is essential that the Plan adopts policies that will encourage and facilitate the provision of infrastructure for the recovery of C&D waste.

Response:

Section 16.6 is part of the specific policy on Municipal and Industrial Waste. The development of future facilities for C&D Waste treatment for the Region is covered in Section 17.1.

Recommended Plan Change:

No change
Issue:
The submissions agree with and support the policies set out in Section 17.1 of the Plan and also believe that the Draft Plan should include a policy on the use of large construction sites as suitable locations for concrete masonry recycling and encourage the provision of temporary facilities at these locations.

Response:
The submission suggestion is noted by the Local Authorities. In Section 17.1, the Plan acknowledges the possible future role that existing quarries and pits can play in the management and recovery of C&D waste.

Recommended Plan Change:
The following in italics will be added to Waste Facilities Objectives in Section 17.1.

Existing quarries and pits to be considered as suitable for the management and recovery of C&D waste.

Issue:
The submissions are concerned that Table 19.2 'Development of Public and Private Infrastructure During Plan Period' does not address the urgency of the requirement of C&D waste recovery infrastructure.

Response:
The submission is noted by the Local Authorities who recognise the need to develop long-term infrastructure for the processing of C&D waste.

Recommended Plan Change:
The following alteration will be made to Table 19.2:

<table>
<thead>
<tr>
<th>Infrastructure</th>
<th>Public</th>
<th>Private</th>
<th>PPP</th>
<th>Timetable for Procurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>C/D Recycling</td>
<td>Possible</td>
<td>Lead</td>
<td>Possible</td>
<td>New facilities provided for the Region by 2008.</td>
</tr>
</tbody>
</table>

Issue:
The submissions advocate a policy which will favour source separation and reward contractors who take the trouble to do so. Whilst it is recognised that mixed skips have an important role to play in confined sites for residual materials their use should generally be discouraged, for this policy to be successful the Draft Plan will need to:

- Identify the need for facilities to recycle the separate waste streams such as timber, metals, gypsum and plastics etc.
- Introduce positive proposal to encourage/develop these facilities.

Response:
Chapter 17.1 highlights the NCDWC Voluntary Industry Initiative which places responsibility on each participant in the construction industry to encourage best practice in terms of waste
management. Through this initiative Local Authorities will ensure that developers implement the appropriate measures on site, maximising waste prevention, re-use and source-separation of C&D waste generated.

Map 8 identifies the waste permit facilities currently in operation in the Region which includes recovery facilities for metal, timber, and C&D waste.

**Recommended Plan Change:**

No change

**Issue:**

One submission questions how effective a voluntary scheme for management of C&D waste would be.

**Response:**

The Voluntary Industry Initiative is supported by the NCDWC, CIF and the DoEHLG and also by the Local Authorities.

**Recommended Plan Change:**

No change

**Issue:**

The submissions propose that the demolition of any building should require a plan for saving as much as possible of the material contained in it.

**Response:**

Demolition of buildings will be built into the C&D Waste Management Plans required from every developer/contractor. This is recognised in Section 17.1 of the Plan.

**Recommended Plan Change:**

No change

### 3.11 AGRICULTURAL WASTE

**Issue:**

An Taisce strongly believes that all agricultural waste (except animal waste containing pathogens) should be anaerobically digested, with the methane used to provide heat or energy and resulting liquids and solids returned to the soil.

Any agricultural waste will comply with regulations and utilise Best Available Technology and best international practice.

**Response:**

The Waste Plan (Section 12.3) recognises that energy policy will increasingly favour the use of
renewable resources such as using agricultural sludges to generate biogas for energy production. There is also the possibility for co-treatment of agricultural wastes with municipal organic waste as recognised in the Draft National Biodegradable Waste Strategy (2004).

Recommended Plan Change:

The following objective will be added to Section 16.5

“Support the development of biological treatment facilities for the co-treatment of agricultural wastes and municipal organic waste.”

3.12 INFRASTRUCTURE/FACILITIES

Issues:

Several submissions suggest that the Plan should encourage private waste management infrastructure/services and the provision of a competitive recycling infrastructure, through the addition of the following bullet point:

- “The local authorities will encourage over-capacity in the provision of waste recovery infrastructure to encourage competition and meet waste management policy commitments.”

The submissions also felt that the Plan should acknowledge the IWMA and its membership working alongside the Local Authorities with the National Market Development Group established by the DEHLG.

Response:

The suggestion to encourage the provision of ‘over-capacity’ is potentially beneficial in encouraging competition and access to waste treatment. However it needs to be approached carefully since over-capacity could also be environmentally unsound and could lead to under utilised and un-needed investment and construction.

Recommended Plan Change:

The following will be added to Section 16.15.

“Some future proofing of the capacity of facilities beyond the tonnage set out in the Plan, in terms of reuse, recycling and recovery facilities, including C&D waste facilities is acceptable under the Plan subject to them being environmentally sound and economically sustainable.”

3.13 MECHANICAL BIOLOGICAL TREATMENT

Issue:

The Herhoff submission proposed the following changes:

Section 16.7 Energy Recovery:

Paragraph 3 After ‘without thermal treatment.’ Add ‘which can be direct or indirect.’

Paragraph 4 ‘Thermal treatment…to… Midlands Region’ Replace with following:
'Systems are well proven in Europe which recover maximum value from waste ensuring that recycling is maximised before producing a fuel for thermal treatment, this fuel can be used either in a dedicated facility or used as a direct replacement for fossil fuels in industry thereby reducing carbon dioxide emissions and helping to mitigate climate change. These systems are called mechanical biological treatment facilities and dry the waste using the natural biodegradation processes to enable materials for recycling (metals, glass and inerts) from municipal waste to be recovered. It will also provide a cost effective treatment system in the context of the Midlands Region.'

Paragraph 5 Replace ‘The development of such a thermal treatment facility…’ with ‘The development of such systems…’

Response:
The Plan has addressed the issue of MBT in Section 16.8 and the Local Authority policy, objectives and targets are outlined therein. Section 16.7 provides policy, objectives and targets for Thermal Treatment only.

Recommended Plan Change:
The heading of Section 16.7 will be changed to ‘Thermal Treatment’

Issue:
The Herhoff submission proposed the following changes:

Section 16.7 Objectives:

First bullet ‘A thermal treatment …to…may be considered’:

Replace with ‘Large scale diversion technology such as MBT linked to a dedicated or external fuel user is required for the Region in order to meet the Plan targets. The Local Authorities shall facilitate the provision of such treatment in the Region. A Public Private Partnership arrangement, or similar approach, may be considered.’

Third bullet ‘The Local Authorities…for the Region’

Replace with ‘The Local Authorities shall explore the mechanisms for treating Municipal waste in a local MBT facility, recovering the recyclate on site and directing the fuel (which is a far more transportable material) to the neighbouring thermal facility if no local industrial user can be found. This reduces transport and treats the waste in line with the EU waste hierarchy which allows thermal treatment once maximum recycling has been achieved and as a preference to landfill disposal.’

Section 16.8 Mechanical Separation and Mechanical Biological Treatment (MBT):

Paragraph 3 ‘MBT is a generic term …to…MBT process’ Add after ‘process.’:

‘MBT can range from relatively simple processes where materials are removed from the wet waste for recycling and the remainder is either composted or turned into a low grade fuel to more advanced forms which use the natural microbial processes in the waste to gently dry the waste first. This allows a far better separation of materials for recycling and produces a higher quality, storable and transportable fuel’.
Paragraph 4 ‘An MBT process.... to... sustainable end markets’ Add after ‘Outputs from MBT processes include’ the following ‘materials captured for recycling (metals, glass and inerts)....’

Paragraph 5 ‘MBT processes...to...MBT processes.’ Replace first sentence ‘MBT processes...to...landfilling.’ by the following:

‘Some MBT processes when linked to fossil fuel replacement are able to avoid landfill completely, municipal waste stream prior to landfilling. others merely reduce the biodegradable content of the municipal waste stream prior to landfilling.’

Response:

The comments on MBT are noted but the Local Authorities feel that the MBT is adequately addressed and described in Section 16.8.

Recommended Plan Change:

The following in italics will be added to fourth paragraph in Section 16.8.

“...Outputs from MBT processes include materials captured for recycling (metals, glass, and inerts), compost like residues, waste-derived solid fuels and in some cases biogas which all require sustainable end markets.”

3.14 WASTE TO ENERGY

Issue:

One submission acknowledges the necessity and urgency for the building of a thermal treatment plant within the Midlands region and to have it operational by 2010. The submission then states that the WTE plant would have to:

- Be in accordance with best practice
- Be accompanied by an informed public consultation and information campaign
- All ash from the plant must be deposited in a proper recognised site in the Region.

Response:

Any proposed Waste to Energy Facility would have to comply with the terms and conditions of Planning permission and operated in compliance with an EPA Waste Licence and the EU Incineration of Waste Directive. Public consultation would be a major component of any proposed facility and stakeholder involvement in the statutory process is essential. The disposal options for ash from a facility would be addressed in the EIS stage.

Recommended Plan Change:

No Plan Change

Issue:

One submission suggests that the feasibility of harnessing landfill gas for energy generation at landfills in the region should be examined and if feasible, projects developed.

Response:
All modern landfills handling municipal waste are expected to be operated to the highest international standards incorporating energy recovery where economically feasible.

Recommended Plan Change:
No Plan Change

Issue:

One submission asks whether the acknowledged deficits in waste data for the Region (in the Executive Summary) should be filled before major projects such as a thermal treatment facility are proposed.

Response:

It is acknowledged by the EPA that national data collection has improved throughout Ireland. National data collection will improve even further over the coming years as the EU Waste Statistics Regulation 2002 will now require the EPA to publish the EPA National Waste Database every two years from 2004 onwards.

In the Midlands, data collection through the Waste Permit and Collection Permit systems has improved significantly over the lifetime of the Plan. It is believed that the current deficits in data are not sufficiently significant to defer the commencement of planning for thermal treatment.

Recommended Plan Change:
No Plan Change

Issue:

One submission disagrees with the statement that ‘the provision of thermal treatment to recover energy from packaging waste will contribute significantly to the continued increase in recovery of packaging waste through to 2011 and beyond’.

Response:

The above quotation in context of the final paragraph is acceptable to the Local Authorities and will remain in the Plan.

Recommended Plan Change:
No Plan Change

Issue:

A number of submissions and feedback forms including those from the Mount Mellick Environmental Group disagreed with the proposals for 37% of waste to be thermally treated. The submission from the Westmeath branch of An Taisce listed reasons they consider WTE plants are not appropriate for Ireland. Among these are:

- The long life of the contract for waste to be delivered to the site. The submission believes that this will reduce the incentive to reduce and recycle and potentially local authorities will be forced to pay if recycling rates are high and can therefore not deliver the agreed waste tonnages.
- The high capital and operating costs of the WTE plants will place a severe burden on the Local Authorities.
- The lack of knowledge on the full health implications of the dioxins once emitted into the atmosphere.
- The dispersed pattern of settlements in Ireland would require transportation of wastes over relatively long distances adding to the environmental impact of the plant.
- Disposal of fly ash and bottom ash requires special landfills.
- There is no guarantee that any form of WTE plant will operate at full efficiency and accident free at all times and any significant accident resulting in emissions could cause widespread economic losses. Adverse public health impacts and loss of confidence in locally produced food products.

**Response:**

Waste to Energy is acknowledged at European, National and Regional level as being an important part of an overall integrated waste management system. At European level the countries with the highest recycling rates also have waste to energy as part of their integrated waste management system. The future Licensed capacity of any waste to energy plant for the Midlands will ensure that the long term residual treatment needs of the Region and the ambitious recycling targets will be met.

It is envisaged that any proposed Waste to Energy facility for the Midlands will be operated under a PPP arrangement or provided by the Private Sector. Irrespective of the procurement procedure, the development of such a facility could only proceed following approval from the EPA and An Bord Pleanála after consideration of an EIS, Waste Licence Application and Planning Application.

The EIS process will provide an in-depth analysis of all potential emissions and their impacts on the local environment and also on the disposal of non-hazardous bottom ash, fly ash.

The proximity principle will be taken into account in the siting of such a facility and all transport issues will be addressed in siting studies and in any subsequent EIS.

Waste to Energy will be run to EPA licence standards as well as international best practice and best available technology.

**Recommended Plan Change:**

No Plan Change

**Issue:**

An Taisce is supportive of the use of district heating systems which are highly energy efficient and make more effective use of scarce energy resources and reduce greenhouse gas emissions. While there is a reference to district heating in Section 14 it is very brief.

**Response:**

It is acknowledged that a district heating system is desirable in the context of the development of a waste to energy facility and can be investigated as part of the EIS for such a facility.

**Recommended Plan Change:**

No Plan Change
3.15 LANDFILL ISSUES

Issue:

One submission requests that processes be put in place for the complete closure of the Ballydonagh Landfill site on expiry of its new extended licence.

Response

Ballydonagh Landfill will continue to be operated in compliance with existing licence conditions for residual waste management in Westmeath.

Recommended Plan Change:

No Plan Change

Issue:

A Submission from An Taisce Westmeath made the following suggestion regarding the acceptance of material for disposal at landfills in the Region:

- Impose increasingly strict criteria for materials which will be allowed into the Local Authority landfills so as to encourage diversion.

Response:

The 4 existing landfills in the Region are operated to the highest international standards and waste acceptance procedures are set down in the terms and conditions of the EPA Waste Licences. The above point is noted and an objective supporting this will be included in the Plan.

Recommended Plan Change:

The following in Italics will be added to Section 16.9:

Objective:

“The Local Authorities will continue to ensure they are compliant with all relevant legislation and regulation with respect to landfill disposal.”

Issue:

The CEWEP submission expressed concern over the excess landfill capacity in the Region and in Ireland and the impact this will have on the successful implementation of the integrated waste management system outline in the Plan. The Plan needs to detail how a transitional period of excess landfill to an integrated waste management system will be developed. Ideally this must be detailed within the Plan and if possible this transitional period must be protected by legislation in order to give potential investors the certainty they require prior to development of the WTE facility.

The Plan does identify that landfill capacity is well served and that excess capacity is required in the short term but the Plan does not identify landfill capacity in the longer term (post 2012) and the impact this will have on the development of other components on the integrated system e.g. a waste to energy facility.
The following issues with respect to landfill capacity and waste to energy were made in the CEWEP submission:

**Annual permitting of landfill facilities:**
Based on the quantity of residual waste generated by the State, a national capacity requirement for landfill could be determined annually. The national capacity could then be allocated among existing landfills by issuing annual permits for maximum capacity. This system has proved effective in restricting landfill in a number of other European countries, while allowing the flexibility that may be required to manage an interim period. As an integrated waste management system develops, this annual capacity could be reduced accordingly.

**Scaling back of future landfill facilities:**
Where landfill capacities not envisaged in the waste management plans have been approved and where it would not be possible to scale back these developments within a region (for example the Kyletalesha Landfill with a lifespan until 2016), the situation can be rectified by scaling back, yet to be proposed or approved, landfills within the Region or in other regions, therefore achieving a suitable national landfill capacity.

**Banning of certain wastes to landfill:**
Countries such as Belgium, Germany, Switzerland and Sweden have successfully banned the landfilling of untreated waste. By introducing such a ban in the Midlands Region all waste would have to be pre-treated (that is, for example recycled, composted or incinerated) and only residual waste disposed to landfill.

**Landfill tax:**
Many countries use an incremental landfill tax in order to incentivise recycling, composting and waste-to-energy by making it more competitive with landfill. Current landfill taxes (per tonne) range from €41 in Sweden; €50 in Denmark; €65 in Austria and €84 in The Netherlands. The landfill tax in Ireland is currently €19 per tonne of waste.

### Response:

| By 2011 three out of the four operational landfills in the Region will have reached licence capacity. The continued filling of these facilities will be dependent on the provision of alternative treatment solutions and available capacity in the Region e.g. Waste to Energy, MBT etc. In the short term landfill will remain the main residual waste management option provided the landfills adhere to their mandatory Biodegradable Municipal Waste targets. The introduction of higher landfill taxes and the determination of annual capacity limits are National issues. |

### Recommended Plan Change:

| No Plan Change |

### Issue:

The confusion over the number of households using Local Authority landfills directly appears in Section 10.1.1 where it is suggested that householders using the landfills directly reflects the ‘unwillingness of householders to pay increasing waste charges for waste collection’. In addition the Plan does not highlight is the fact that the pro rata cost for a householder to dump waste in the local authority landfills in the region is considerably lower than the ‘tonnage’ gate fee charged to private contractors. This oversight must be addressed in the final report and there should be a level playing field across the board for householders and waste contractors.

### Response:

| The Midlands Local Authorities have a wider social responsibility in facilitating access to facilities by members of the public living in the environs of the landfills and also in ensuring |
that the amount of waste that is disposed of illegally is minimised. Any significant increase in the landfill gate fees could lead to a further increase in illegal disposal/backyard burning.

Recommended Plan Change:
No Plan Change

3.16 CONTINGENCY

Several submissions expressed concern that the Plan does not outline a contingency plan or provision for alternative arrangements if there is to be a delay in the delivery of key infrastructure – biological treatment, Landfill, Waste to Energy which could result in a failure to deliver on the proposed targets.

Response:

The issue raised is valid and requires a balanced approach. The failure to deliver key infrastructure for the Region will affect the achievement of the adopted targets and in meeting the requirements of the EU Landfill Directive. In response to this a new policy section will be added in the Plan in Chapter 16.

Recommended Plan Change:

The following will be inserted as a new Section (16.16) in the Plan:

16.16 Contingency

In relation to contingencies in the event of delays or failure to implement the Waste Plan, the following will result:

- Failure to achieve recovery/recycling targets will lead to more pressure on Waste to Energy and/or disposal facilities
- Failure or difficulties in achieving Waste to Energy capacity will increase pressure on landfill disposal, requiring short term extensions
- Delay in providing extensions to existing landfill capacity will increase pressure on use of existing sites, in the Region or other regions in the short term
- In the event that preferred locations for waste facilities that have been identified for a particular purpose are subsequently determined to be unsuitable, the Local Authorities may select another preferred site, with reference to any relevant siting studies.

3.17 DIRECTING WASTE

Issue:

Several of the submissions from the private waste sector expressed concern over the proposal to direct waste to meet Plan objectives (Section 15.7). The private waste sector are concerned that this could be open to abuse in an anti-competitive manner if applied inappropriately, creating unfair competition in the market. For example, if there is only one facility in the Midlands Region for a certain tier of the hierarchy and a waste collector is directed in his waste collection permit, to deliver a certain percentage of the waste he collects to that facility, then potentially a monopoly situation exists. It is felt that the Plan must be clear on the details of ‘directing’ waste, considering commercial and competitive realities. What is the mechanism for determining where waste goes when several facilities claim to be
on an identical level of the hierarchy? The submissions put forward two possibilities whereby competition could be maintained:

- The waste could be directed to a particular tier with the option to use a higher tier if possible.
- Directing waste to a higher tier does not have to be confined to the Midlands Region.

**Response:**

The principle of directing waste to a certain tier in the waste hierarchy seems in general to be accepted in the submissions. The rationale for this is to ensure the Plan targets of recycling and energy recovery are met, and that a decision of what to do with waste is made on environmental considerations as opposed to purely commercial considerations.

It is not intended to use this power to introduce any uncompetitive forces into the market. For example if waste is directed to energy recovery, this could be achieved by sending the waste to a WTE facility in the Midlands or another region, or to another form of energy recovery facility (but not landfill) in Ireland or another country.

The suggestion of directing to a particular tier ‘or a higher tier if possible’ seems reasonable, but such detail would be included in the text of any direction issued.

While in theory the Local Authorities could direct waste to landfill this is unlikely given that disposal is the lowest option on the hierarchy, whether or not the landfill is recovering energy. In this regard a Section on Directing Waste will be added to the Plan, refer to Section 16.16.

**Recommended Plan Change:**

The last paragraph under Section 15.7 will be deleted and the following (in italics) will be added to the overall Policy Statement Objectives for the Region under Section 15.7.

“The Midlands Local Authorities shall direct waste to licensed facilities with preference to facilities which are higher up the EU Waste Hierarchy. This will be achieved by means of the Waste Collection Permit system or other appropriate regulatory or enforcement measures.”

### 3.18 UNCOLLECTED WASTE

Several submissions express support for the proposed actions to address the issue of uncollected waste and believe that it should be addressed as a matter of priority, especially as actions in this area are now supported by the recent Section 60 policy direction issued by the Minister for the Environment Heritage and Local Government.

### 3.19 WASTE PERMITS

**Issue:**

The submissions acknowledge and support the efforts of the Local Authority enforcement teams over the past couple of years however the bureaucracy and disparity involved in the current waste collection permitting system is adding costs to waste companies and consequently to customers in the Region with no discernible environmental benefits in some cases. The submissions highlight several areas of the permit process that need immediate attention:

- Waste companies operating in several regions need to apply for permits from each region. A national waste collection permitting system is needed.
• There is a doubling up on legislation whereby tax disks are required by the waste regulation authority and this can lead to delays in the issuing of permits.

• The requirement for the display of key-cards for each waste management region can lead to safety issues whereby a windscreen may need to display up to 10 key-cards. Loss of key-cards can lead to compliance difficulties.

• The requirement to individually identify each EWC code is onerous as are constant amendments or additions to the identified codes. An ‘on-line’ system where waste companies can submit the relevant data would be more efficient for all concerned.

Response:

The issues above are noted. However they would need to be enacted at a National rather than Regional level. However the Waste Collection Permit Regulations are being reviewed and the public consultation process has just been completed. The new regulations are due in early 2006.

Recommended Plan Change:

No Plan Change

Issue:

The submission from the EPA acknowledges the difficulties faced by Local Authorities regarding the collection of consistent quality data and welcomes the proposal for a review of the current recording systems with a view to standardising the way that figures are collected and reported.

The EPA submission suggests that the Local Authorities should continue to develop audit programmes for waste permit and collection permit holders to verify the data submitted against original records, this will also allow the Local Authorities the opportunity to understand the difficulties and constraints facing the permit and collection holders in maintaining records and reporting.

Response:

The Local Authorities note the comments from the EPA regarding data collection and will endeavour to improve data collection during the lifetime of the Plan. The Local Authorities will continue to regulate waste collection and facility permit holders and insist on improved data reporting where required. In Section 16.3 the Local Authorities have set into the objectives and targets for waste collection that annual reporting from collectors and permit holders will be standardise to ensure higher quality more consistent data.

Recommended Plan Change:

No Plan Change

3.20 ECONOMIC INSTRUMENTS

Section 12.2.13 of the Plan makes no reference to the variety of economic instruments and incentives suggested and advocated by the OECD, the European Commission, the Economic and Social Research Institute (ESRI) and by An Taisce.

Response:

The introduction of economic instruments is a National issue.
Recommended Plan Change:
No Plan Change

3.21 ROLE OF THE PRIVATE SECTOR

Issue:

The submissions note that the Plan wishes to encourage private sector investment, there are instances where the role of the private sector is omitted or inadvertently portrayed in a negative way. The following bullet points have been highlighted in the submissions as areas where the Plan could be amended to better reflect the role of the private waste sector in the implementation of the Plan. The following issues are from the IWMA:

- “In Section 9.1 it states: “Recycling is increasing but the number of private waste collectors in the Region and varying recyclable collection schemes and waste charges is hindering household participation and waste recovery”. Currently all local authorities in the Region with the exception of Westmeath County Council have opted not to continue with the direct provision of a waste collection service. In Section 7.1 of the plan, the above quote is contradicted when it is noted that many households have a separate bin or bag for mixed dry recyclables in addition to the normal mixed household waste bin. The submissions request that reference to the private sector being in some way responsible for hindering participation in recycling as described in Section 9.1 is removed.”

- “Section 12.4.4 of the document describes the recent consolidation of the waste industry and notes “a small number of larger professional and well organised companies now offering a high level of service”. This section goes on to say that as a result of this consolidation, waste charges have inevitably increased to reflect the higher level of service and the move towards an increasingly integrated waste management system. There should be a balance provided in this section with reference to the control of the local authorities in terms of waste disposal. Currently both public and private undertakings provide waste services. While the private sector continues to attempt to develop new infrastructure, the public sector has retained control over a diminishing landfill capacity. This situation has lead to access constraints and high costs for consumers. It has also hampered the development of new infrastructure.”

- "There should be recognition of the role played by the private sector in relation to regulation and enforcement. Private sector waste management companies, singularly and through the Irish Waste Management Association (IWMA), have been a vital contributor to the development of policy in relation to enforcement and regulation. The vast majority of private waste management service companies work entirely within the law and thus face substantial obligations and costs in order to abide by waste management controls aimed at protecting the environment and public health.”

- “In general, the plan must acknowledge that the role of the private sector has grown in significance since the late 1990’s. This trend is set to continue as the industry matures and consolidates. The plan should recognise that it is likely that the role of the public sector in service provision will continue to diminish and that within 3-5 years (i.e. within the life of the new plan), the great bulk of all waste management services, including waste collection will be provided by the private sector. Local government’s role will then more naturally tend towards that of planner, facilitator and regulator of services rather than be in direct provision and operation.”

- An Taisce suggests that “the Local Authorities should reconsider the present strategy of ‘privatising’ waste collection and disposal. In many locations this has resulted in the handing over of all waste related activities to the waste disposal industry – a step which encourages waste disposal instead of resource recovery.”
Response:

Taking account of the submissions it is considered that the comments relating to the role of the private sector in the Plan (e.g. Section 12.4.4, Section 20.5 and Table 19.2) are balanced.

Recommended Plan Change:

The first sentence of paragraph 4 of Section 9.1 will be amended to read:

“Recycling is increasing but the number of varying recyclable collection schemes.........and waste recovery.”

Issue:

“The IWMA have a serious concern around Table 19.2 in its current form. Whilst we recognise the intention to encourage the provision of the waste management infrastructure identified in the current plan, we respectfully submit that Table 19.2 will have a negative effect on the provision of future facilities by the private sector waste industry. The planners will use this Table as an index of what is acceptable and unacceptable in planning terms. The boxes marked ‘yes’ relate to facilities that are deemed in compliance with the plan and hence these facilities are likely to be granted planning permission. The boxes marked ‘possible’ relate to potential facilities that will be open for consideration for planning permission. The problem lies with the boxes that are not marked with ‘yes’ or ‘possible’. It is likely that the planners will interpret this Table to mean that it is not possible for these facilities to comply with the waste management plan. The logical conclusion will be that a private waste company could be prevented from providing necessary infrastructure such as bring banks, recycling centres, waste transfer stations, waste composting, WTE and residual landfill capacity in the Midlands Region. This is clearly counter-productive in meeting the goals and objectives of the waste management plan and will stifle development and competition. We suggest that this difficulty could be overcome quite simply by marking all blank boxes in this matrix with the label ‘possible’. This suggestion is in line with encouraging a competitive, cost-effective, environmentally sound integrated waste management infrastructure for the region.”

Response:

During consultation, the private waste sector asked for some clear guidance on the ‘rules of engagement’ in other words which sector (public or private) was expected to deliver the infrastructure and services of the Plan. The purpose of Table 19.2 is to illustrate who is intended to lead the implementation of the key infrastructure. However the issues raised in the submission are fair, and it is accepted that a revision is required to avoid ambiguity. This will be achieved by more detailed comments in each row of the table.

Recommended Plan Change:

<table>
<thead>
<tr>
<th>Infrastructure</th>
<th>Public</th>
<th>Private</th>
<th>PPP</th>
<th>Timetable for Procurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bring Banks</td>
<td>Lead</td>
<td>Possible</td>
<td>Possible</td>
<td>LA will lead implementation, but private collectors and property developers may also be required to provide bring banks. Bring bank density: 1:1250 to be provided in the Region by 2010.</td>
</tr>
<tr>
<td>Civic Amenity Facilities</td>
<td>Lead</td>
<td>Possible</td>
<td>Possible</td>
<td>Each LA to develop and upgrade existing facilities. Private proposals and PPP options will also be considered. 7 additional sites by 2010 (must accept Household Hazardous waste, WEEE and Green Waste).</td>
</tr>
<tr>
<td>Green Waste Collection</td>
<td>Possible</td>
<td>Lead</td>
<td>Possible</td>
<td>Public operated Civic Amenity Facilities to accept household green waste where possible by 2010. The roll-out of the brown bin will start from 2007.</td>
</tr>
</tbody>
</table>
Green Waste Facility | Possible | Lead | Possible | Private sector expected to lead development of green waste composting facility. PPP options will be considered. One green waste facility for the Region to be provided by 2010.

Biological Treatment | Possible | Lead | Possible | Minimum biological treatment capacity of 30,000 – 40,000 tonnes to be developed in parallel with the roll-out of the brown bin.

MRFs/Waste Transfer Stations | Possible | Lead | Possible | Additional capacity will be required to accommodate increased quantities of source-separated waste.

Thermal Treatment Facility | Possible | Lead | Possible | Feasibility study to commence in 2006.

Municipal Landfill | Lead | Possible | Possible | Additional phases as per the existing Waste Licences. The current municipal landfill capacity within the Region is deemed adequate for the lifetime of the Plan (2005-2010) and there is no need to develop further facilities during this period.

Construction/Demolition Recycling | Possible | Lead | Possible | New Facilities provided for the Region by 2008.

WEEE | Lead | Possible | Possible | All major Civic Amenity Facilities are presently collecting WEEE.

Trial Reuse/Repair | Lead | Possible | Possible | One centre for the region by 2007.

Community Bring Facility | Possible | Possible | Lead | One trial community facility to be established in the Region by 2007.

National Waste Facility | Possible | Possible | Lead | The development of such facilities will be based on national market demand, siting criteria and environmental, planning considerations.

```
“Guiding Footnote:
The purpose of Table 19.2 is to illustrate who is intended to lead the implementation of the key infrastructure.
Boxes marked ‘lead’ recognise the sector (Public, Private, or PPP) that is most likely to develop that facility in the Region during the life of the Plan.
Boxes marked ‘possible’ relate to potential facilities that will be open for consideration for planning permission.”
```

Issue:

In Section 16.13 of the Plan, the penultimate bullet point requires private companies collecting household waste to provide a full range of services including bring banks, dry recyclable collection, organic waste collection, recycling centres and bulky waste collection. The submissions agree with the polluter pays principle enshrined in this statement, but ask that where these services are uneconomical, they should be supported by proceeds from the landfill levy and the plastic bag levy i.e. grant aid for waste services and infrastructure should be open to both the public and private sector.

Response:

Currently the Environment Fund, which is where the levies are collected, is available for Local Authority recycling schemes and not private sector companies. In respect of the reference to section 16.13 of the Plan and responsibility for providing a full range of waste management services, we proposed that where such services are uneconomic to provide, the private sector contractor could arrange with other organisations such as Local Authorities to provide such services. If private sector companies are engaged in household waste collection, the Plan
requires them to provide the full range of recycling services as provided by the Local Authority. National policy currently determines that only local authorities are eligible for limited grant-aid/funding from the Environment Fund.

Recommended Plan Change:
No Plan Change

3.22 STEERING GROUP

Issue:
The submissions suggest that the Plan should fully recognise the role of the private sector waste industry in achievements to date and implementation of the Plan going forward. The submissions suggest that the private waste industry, perhaps through the IWMA be included in the steering group. This partnership approach would ensure that all those involved in waste collection and management could develop towards our common goals.

Response:
The Steering Group is comprised of representatives from each Local Authority in the Midlands Region and no other sectors are currently represented. The Local Authorities recognise that ongoing close cooperation with the private waste sector will be beneficial in Plan implementation. It is proposed that the Steering Group meet the IWMA and other interested parties twice a year to discuss issues, developments and Plan implementation in the Region. It is noted that not all waste companies are members of IWMA and this needs to be borne in mind in future arrangements.

Recommended Plan Change:
No Plan Change

3.23 TARGETS/SCENARIOS/INDICATORS

Issue:
The Plan recommends a series of headline indicators for monitoring the overall success of the plan implementation. The submissions recommend that the list be expanded to include:

- Waste categories relating separately to commercial and industrial waste tonnages arising
- Percentages recovered/recycled
- Number of prosecutions and clean up of contaminated/illegal sites.

Response:
Section 19.5 outlines the service indicators the Local Authorities will be reporting on annually. In addition and there will be an Annual Waste Report, reporting on progress made in the implementation of the Waste Plan which will look at issues wider than the service indicators.
Recommended Plan Change:
No Plan Change

Issue:
The modelling study undertaken in 1999 takes a narrow view of costs and revenue with no assessment of the wider environmental benefits and environmental costs of each of the three scenarios. An Taisce strongly advocate that a broader assessment of the environmental and economic benefits of a wider range of options should be undertaken.

Response:
The preferred scenario identified in the Midlands Waste Management Strategy (1999) was the Best Practicable Environmental Option (BPEO) based on a full environmental assessment of the various scenarios. In addition the non-statutory SEA carried out for the current Replacement Plan also considered the environmental impacts associated with the various scenarios. Any future broader assessment of the environmental and economic benefits of a wider range of options should also include an assessment of the associated costs.

Recommended Plan Change:
No Plan Change

3.24 IMPLEMENTATION

The submissions are concerned about the proposed roll-out of organic collection or dry recyclables particularly with regard to development of associated infrastructure.

Response:
The proposed roll out of the organic collection services will be altered from mid 2006 to 2007 to allow for biological treatment capacity to be developed in the Region. The infrastructure capacity for the sorting and baling of dry recyclables in the Region is currently sufficient but the continued expansion of the scheme will require additional processing capacity.

Recommended Plan Change:
The following section of Table 19.1 will be amended as follows:

<table>
<thead>
<tr>
<th>Collected Waste</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standardise the reporting methodology across the Region</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roll–out of organic collection to 50% of households</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roll–out of dry recyclables collection to 70% of households</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roll–out of organic collection services to commercial and industrial premises</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
4 RECOMMENDATIONS FROM SEA

The SEA process requires that an assessment be made of how the SEA process and/or Environmental Report influences or improves the Waste Plan. In the Environmental Report a set of broad recommendations were made (given in bullet points below). These potential improvements should feed into the Final Plan, where appropriate.

The recommendations set out in the Environmental Report as set out below have been assessed as part of the consultation process and dealt with in a similar way to the submissions/observations made by the public and other groups. The responses to the various recommendations are given in the shaded boxes. The majority of the recommendations made in the Environmental Report have already been taken into account in the Draft Plan.

Waste Prevention/ Minimisation:-

- The Policies relating to prevention, minimisation, and reuse generally do not have an environmental impact. It is recommended that there be major emphasis on waste prevention, minimisation and reuse policies in the Waste Plan. It is further recommended that an indicator of waste reduction/minimisation be identified in the Plan and monitored on a regular basis to establish the success or otherwise of measures proposed in the plan to reduce/minimise the waste generated in the Midlands.

**Response:**

Policies relating to prevention, minimisation and reuse of waste are given priority in the Plan in line with the EU waste hierarchy and National policy. These are addressed in Chapters 16 (Policy) and 19 (Implementation) of the Plan.

**Recommended Plan Change:**

No Plan Change

Co-ordination of Management, Collection and Treatment:

- It is recommended that the Plan should provide policies and strategies on comprehensive auditing and control of waste management activities in the region.

- The issues of the level of waste collection charges, waste facility gate fees etc. are largely outside the brief of the SEA. However, collection charges should not act as an encouragement to illegal dumping or burning of waste.

- There should be mechanisms for monitoring implementation of the Waste Plan during its lifetime. This would allow progress or lack of progress to be reviewed and acted upon as early as possible within the timescale of the Plan.

**Response:**

The Plans sets out comprehensive policies for implementation of the Plan in the Region. Chapter 20 of the Plan also sets out the responsibilities of various parties including the EPA and the Local Authorities who each have responsibilities in relation to regulating waste activities in the Region.

The issue of waste facility gate fees was also raised during the consultation process and is
Chapter 19 of the Waste Plan sets out proposals for the implementation of the policies set out in the Plan and includes implementation timescales, measures for monitoring the implementation through service indicators and also Annual reporting requirements. Section 20 of the Plan outlines the roles and responsibilities of the various parties in implementing the recommendations of the Plan.

Recommended Plan Change:
No Plan Change

Reuse:

- It is recommended that the concept of reuse be further investigated in terms of the feasibility of implementing reuse schemes in the Midlands. This should be co-ordinated with a national effort to encourage reuse.

Response:

Proposals for reuse of waste are set out in Section 16.4 of the Plan including household, local authority, commercial and industrial sectors. It is proposed that the Environmental Awareness Officers and the proposed Green Business Officers will play a key role in promoting awareness and measures for reuse of waste.

Recommended Plan Change:
No Plan Change

Recycling:

- The Midland Local Authorities should look at the possibility of implementing a pilot initiative in the region to provide for glass bottle returns. This could be carried out in conjunction with e.g. a drinks manufacturing company and if successful could be developed as a national initiative. The Local Authorities should also encourage a national initiative to provide recycling processing facilities within the state.

- It is recommended that an audit of the current routing, destinations and processing of recyclables collected in the Midlands be undertaken to determine the environmental benefit of current operations. It is also recommended that a similar audit be under-taken at a national level by the relevant authorities.

- It is further recommended that national objectives be set for the establishment of national recycling process facilities where such facilities can be sustainable. Also national guidance should be developed on environmentally sustainable routing, destination, processing and disposal of residual materials collected in the Republic of Ireland.

Response:

It is recognised that it would be preferable for recyclables collected in Ireland to be recycled in this country. However it must also be acknowledged that there are not sufficient economies of scale to make the development of much of the required processing infrastructure viable. On this basis Ireland will continue to be dependant on global markets and outlets for recyclables. This is an issue of National relevance and can only be dealt with at a National level, perhaps through the Market Development Group. However the results of an audit of routing and destinations for recyclables from the Midlands Region could be of benefit to the Market
Development Group in assessing options for developing indigenous recycling markets. The introduction of a deposit-refund scheme for bottles would only be possible on a National level.

Recommended Plan Change:
The following objective will be added to Section 16.4.1.

“An indicative audit of the current routing and destination of recyclables will be carried out in one county over the life of the Plan.”

Biological Treatment:

- It is recommended that the implementation of the policies identified in the Plan for the provision of segregated collection systems and the provision of processing/treatment facilities for organic waste be actively encouraged by Local Authorities in the Region either through the provision of incentives for private developers or by the provision of facilities by the Authorities themselves.

- It is recommended that the identified siting criteria be adhered to for these facilities.

- It is recommended that a national/inter-regional study be undertaken to identify markets for the end products of such facilities.

- The Midlands Local Authorities should actively encourage the use of home composting through the provision of incentives.

Response:
The policies on Biological Treatment including the separate treatment and collection of organic waste are accompanied by implementation timetables set out in Chapter 19 of the Plan. Table 19.2 sets out a framework for the development of the required infrastructure including the role to be played by the public and private sectors including, where required, a partnership arrangement.

The Plan recognises the importance of good siting for future waste facilities in the Region and guidelines for siting are set out in Section 16.14 of the Plan.

The undertaking of a National/Inter-Regional study to identify markets for the end products of biological treatment is a National issue.

The Plan recognises the advantages of home composting particularly for those households who do not have access to a separate collection for organic waste. This is addressed in Section 16.2 of the Plan.

Recommended Plan Change:
No Plan Change

Energy Recovery:

- It is recommended that the Midlands Local Authorities actively pursue the procurement of a thermal treatment facility for the Midlands or liaise with adjacent regions to ensure the procurement of a joint facility, as one measure in a suite of measures to reduce the amount of waste currently being disposed of in landfills in the Region.
Response:

Section 16.7 addresses policy on Thermal Treatment and includes an objective for the Local Authorities to engage with the private sector to assess the interest in developing such a facility.

Recommended Plan Change:

No Plan Change

Landfill:

- It is recommended that the Midlands Local Authorities actively pursue the implementation of the objective set in the 1999-2004 Waste Plan to provide alternative waste management facilities in order to minimise waste to landfill. It is further recommended that the objective of upgrading existing facilities in order to minimise their environmental impact be implemented. This objective should also be pursued in relation to landfills that have already been closed.

- It is recommended that in the event that additional landfill capacity is required in order to cater for the disposal of waste until alternative management options can be commissioned, the siting criteria for landfills identified in this report should be adhered to.

Response:

The Policy recommended in Chapters 16 and 17 is based on the EU Waste Hierarchy with its aim of reducing landfill disposal. The Plan does recognise however the need for residual landfill to be operated to the highest international standards.

Sections 16.10 of the Plan addresses policy in relation to the remediation of closed landfills in line with recent guidance issued by the Minister.

Recommended Plan Change:

No Plan Change

Overall recommendations:

- With the exception of polices on the collection of wastes for recycling and disposal, few of the policies identified in the original Waste Plan for the region have been achieved in the intervening period. These issues need to be addressed in order to achieve the national targets set by the government for 2013. Waste management infrastructure including biological and thermal treatment needs to be put in place as a matter of urgency.

- It is recommended the waste management hierarchy identified at EU and national level be rigorously implemented in the Midlands Region in order to minimise the impact of waste management on the environment. The emphasis should be at the upper level of the hierarchy. The policy to explore mechanisms for directing waste to treatment methods in line with the hierarchy would tie in with this recommendation.

- Wastes generated in the region should be managed in an integrated and sustainable way, to minimise impacts on the environment. There needs to be a co-ordinated approach in relation to waste collection in particular.

- It is further recommended that the procurement of the waste management options identified in the Best Practical Environmental Option developed in the original Waste Plan be actively pursued, directed and co-ordinated by the Local Authorities rather than relying on the commercial waste market to provide these facilities.
In addition it is recommended national initiatives be undertaken in relation to investigating the feasibility of reuse schemes and procuring recyclables processing facilities at a national level where sustainable and where this is not sustainable, providing guidance on environmentally sustainable routing and processing options at an international level.

Response:

The policy set out in Chapters 16 and 17 of the Plan is based on the EU Waste Hierarchy with its aim of reducing landfill disposal and focussing on the upper levels of the hierarchy. The Plan recognises that progress in some areas of the first Midlands Plan (2001) has been slower than intended. However the proposed Replacement Plan sets out an implementation timetable for the development of an integrated waste management system in the Region including the roles and responsibilities of all stakeholders in achieving the aims of the Plan. The Local Authorities recognise that the delivery of infrastructure during the period 2005-2010 will be critical in achieving the adopted Regional targets and the requirements of the EU Landfill Directive.

Recommended Plan Change:

No Plan Change
5 FEEDBACK FORMS

The feedback forms were printed on the back of the Summary Guide, which was available on-line and in the Local Authority Council Offices. A total of 17 feedback forms were received. A list of those who sent in feedback forms is listed in Appendix B.

The graphs below illustrate graphically the answers to questions 1, 2, 3, 5, 6 and 7. Each graph is followed with a summary of the comments associated with each question. Question 4 is dealt with in more detail at the end of this chapter.

Question 1: Do you support the integrated nature of the Draft Plan i.e. 46% recycling, 37% incineration and 17% landfill?

![Pie chart showing support for the integrated nature of the Draft Plan]

41% Yes, 59% No

Summary:

The majority of feedback forms acknowledge that the targets present a balanced approach to waste management in the Midlands Region. Within the feedback forms that agree with the integrated approach, several would like to see a higher recycling target and a lower thermal treatment target in order that the percentage of waste to landfill is reduced further. Those who are not in favour of the integrated approach believe that Incineration is not a solution to the waste problem and that not enough effort is being aimed at prevention of waste at source.

Question 2: Producing less waste will reduce the cost of waste management. How can you be helped to minimise your waste?

The responses to this question were quite varied, the most common response was for the need to have less plastic packaging on goods and suggestions that we should only use glass paper and card for packaging. Other suggestions expressed were as follows:

- Compost bins provided to every home
- Environmental Education programmes need to be put in place
- Reduce the cost of bin collections
- Reduction in the quantity of plastic packaging
- No charges for recycling
- Easy access to composting facilities for garden waste
- Encourage manufactures to use less packaging
- Provide more recycling centres
- Rewards/incentive to those with good waste disposal habits
- The markets for recyclable products to be kept within Ireland.
Question 3: What would help you recycle more of your waste?

![Pie chart showing recycling methods]

The graph above shows that Radio followed closely by Television is the most effective method of communicating with the public about waste minimisation. The graph below shows that almost half the respondents believe additional recycling centres would help them recycle more of their waste and this was supported with comments.

![Pie chart showing public support for recycling centres]

Summary:

There were a good variety of ideas put forward on how the public can best be helped to increase the amount they recycle.

Suggestions include:

- Recycling bins to be outside all Tescos, Dunnes etc
- Make the vendor responsible for the packaging
- If recycling was free
- Environment Groups attached to each housing estate
- Facility that recycles light plastics e.g. cling film crisp packets and other items not currently accepted at Civic Amenity Facilities.
- A travelling recycling facility that visits housing estates it could have an educational component for the public.
Question 4: What do you think of the introduction of a brown bin to collect your household organic waste?

A total of 53% of the respondents said they think the Brown Bin is a good idea and an additional 41% said they thought it was a good idea but had some concerns that would need to be addressed and only 6% of the respondents thought it was a bad idea. The most common concerns that were raised were:

- Some respondents wanted to know how the charging system for this service would work.
- Several respondents wanted to know how the contents of the brown bin would be treated and what its final destination would be.
- There were concerns over the collection frequency with most respondents suggesting that it would need to be weekly to ensure there are no odour or vermin issues.
- Those who have small or no gardens and therefore cannot compost successfully due to the right mix of ‘greens and browns’ not being available were very keen for the Brown Bin Service to be introduced.

Of the 6% who said that they didn’t think a Brown Bin was necessary it was primarily due to the fact that they currently compost all their kitchen and garden waste and the service would be of no benefit to them.

Question 5: The Draft Plan calls for additional recycling facilities – are you happy to have one in your community/near your home?

![Pie chart showing 93% Yes, 7% No]

Summary:

A total of 93% of the respondents stated they would be happy to have a recycling facility in their community or near their home, and many provided reasons why. Some of them are mentioned below:

- Would encourage recycling
- If the facilities were closer there wouldn’t be a need to use a car
- They should be put next to community buildings e.g. Court House, Library etc.
- As long as the facility is maintained and monitored and serviced regularly.
- Recycling could be done on a regular basis rather than taking a big load to the recycling centre
Question 6: What do think is the single biggest waste challenge facing the Midlands Region?

![Pie chart showing percentages of responses]

**Summary:**
A total of 31% of the respondents felt that Illegal Waste Activity was the biggest challenge facing the Midlands Region and 22% believed it was Public Apathy and Increased Waste Arisings, closely followed by Slow Delivery of Waste Infrastructure (20%). There was a variety of ‘Other’ waste issues the respondents felt were proving a challenge to the Region, for example:

- Waste coming in from other regions
- No assistance for those without transport or nearby recycling centres
- The cost of disposing of waste appropriately is prohibitive

Question 7: What is the best way to keep you informed about waste in the Region?

![Pie chart showing percentages of responses]

The respondents felt that Advertising would be the most effective medium to keep the public informed of the waste issues (35%) and this was closely followed by Newsletters with 31%, and Public Meetings with 24%. Other suggestions include:

- Word of mouth through small group initiatives
- Local Radio
- Local Councils sending representatives to community groups
- Local Environmental Groups
- Through the School system.
APPENDIX A

Statutory Notice
WASTE MANAGEMENT ACTS 1996 – 2003

PROPOSED REPLACEMENT WASTE MANAGEMENT PLAN FOR THE MIDLANDS REGION 2005-2010

NOTICE IS HEREBY GIVEN in accordance with Section 33 of the Waste Management Act 1996, as amended, that Offaly County Council, Laois County Council, Longford County Council, North Tipperary County Council and Westmeath County Council have prepared a Proposed Replacement Waste Management Plan for the Midlands Region.

Copies of the Proposed Replacement Plan will be available for inspection from Monday 25th July 2005 and Friday 30th September 2005 from 9.00am - 4.30pm, Monday to Friday (except for public holidays) at the following locations:

Offaly County Council
- Aodhain Naomh, Offaly
- www.offaly.ie

Laois County Council
- Aodhain Naomh, Portlaoise, Co. Laois
- www.laois.ie

Longford County Council
- Aodhain Naomh, Granard, Co. Longford
- www.longford.ie

North Tipperary County Council
- Aodhain Naomh, Athlone, Co. Westmeath
- www.westmeath.ie

Westmeath County Council
- Aodhain Naomh, Mullingar, Co. Westmeath
- www.westmeath.ie

In addition the Proposed Replacement Plan will be available for inspection in Public Libraries in the Midlands Region during normal opening hours and it may be viewed online at www.wasteplan.ie from 21st July 2005.

A copy of the Proposed Replacement Plan can be purchased for €40 or a CD version is available for €35 from the local authorities' head offices.

Written Submissions

Written representations in relation to the Proposed Replacement Plan will be accepted at the local authorities' head offices within the above period will be taken into consideration by the local authorities before the adoption of the Replacement Waste Management Plan. Written representations should be made in the attention of The Director of Services, Environment Section in the address above, or emailed to wastemanagementplan@localauthoritydomain.

Submissions are to be received not later than 30th September 2005.

All correspondence should be marked "Proposed Replacement Waste Management Plan"
APPENDIX B

List of Written Submission & Feedback Forms
APPENDIX B – List of Written Submissions

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ethan Whelan</td>
<td>Department of Communications, Marine &amp; Natural Resources</td>
</tr>
<tr>
<td>Sissis Hovden</td>
<td>North Tipperary Community &amp; Voluntary Association</td>
</tr>
<tr>
<td>Kevin O'Sullivan</td>
<td>Herhof Environmental</td>
</tr>
<tr>
<td>Brian Meaney</td>
<td>EPA</td>
</tr>
<tr>
<td>Jackie Keaney</td>
<td>Confederation of European Waste to Energy Plants Ireland</td>
</tr>
<tr>
<td>Malcolm Dowling</td>
<td>Greenstar</td>
</tr>
<tr>
<td>Jack O'Sullivan</td>
<td>An Taisce Westmeath</td>
</tr>
<tr>
<td>Transition Students</td>
<td>St Joseph's Secondary School</td>
</tr>
<tr>
<td>Erik O'Donovan</td>
<td>IWMA</td>
</tr>
<tr>
<td>Andrew Hetherington</td>
<td>REPAK</td>
</tr>
<tr>
<td>Peter &amp; Angela Flood</td>
<td>Carrickboy, Co. Longford</td>
</tr>
<tr>
<td>Don O'Sullivan</td>
<td>CIF</td>
</tr>
<tr>
<td>Sean Hegarty</td>
<td>NCDWC</td>
</tr>
<tr>
<td>Eoin Faller</td>
<td>Fianna Fail (Athlone Comhairle Ceantair)</td>
</tr>
<tr>
<td>Richard Murphy</td>
<td>Westmeath Environmental Group</td>
</tr>
<tr>
<td>Kevin Healion &amp; Roisin Ryan</td>
<td>Thurles, Co. Tipperary</td>
</tr>
</tbody>
</table>

List of Strategic Policy Committee meetings

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Date</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Longford County Council SPC (Water Services &amp; Environment)</td>
<td>12th September 2005</td>
<td>Minutes received</td>
</tr>
</tbody>
</table>

List of Feedback Forms

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Members of MEG</td>
<td>Mount Mellick Environmental Group, Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>William O'Brien</td>
<td>Mount Mellick Environmental Group, Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Sandra Dunne</td>
<td>Mount Mellick Environmental Group, Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Martin Colbert</td>
<td>Mount Mellick Environmental Group, Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Martin Colbert Jnr</td>
<td>Mount Mellick Environmental Group, Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Rose Turner</td>
<td>Mount Mellick Environmental Group, Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Pres. Sisters</td>
<td>Mount Mellick Environmental Group, Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>No Name</td>
<td></td>
</tr>
<tr>
<td>Mary Fallon</td>
<td>Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>C. Geoghegan</td>
<td>Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>K. Creighton</td>
<td>Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Joan O'Reilly</td>
<td>Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Eithne Farrell</td>
<td>Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Teresa McCrohan</td>
<td>Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>Celine McMahon</td>
<td>Mount Mellick, Co. Laois</td>
</tr>
<tr>
<td>No Name</td>
<td></td>
</tr>
<tr>
<td>Eoin Faller</td>
<td>Fianna Fail, Athlone, Co. Westmeath</td>
</tr>
</tbody>
</table>