

2021 Evaluation of the Regional Waste Management Plans

Eastern Midlands Region / Connacht Ulster Region / Southern
Region Waste Management Plans 2015 - 2021



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- Appendix B Legislative Review

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Acronyms

| Term | Meaning |
|-------|--|
| AA | Appropriate Assessment |
| AR | Annual Returns |
| CAS | Civic Amenity Site |
| CCPC | Competition & Consumer Protection Commission |
| CoA | Certificate of Authorisation |
| CoR | Certificate of Registrations |
| CRNI | Community Reuse Network Ireland |
| CSAI | Charity Shop Association of Ireland |
| CUR | Connacht Ulster Region |
| DAFM | Department of Agriculture, Food and the Marine |
| DECC | Department of the Environment, Climate and Communications, formerly the Department of Communications, Climate Action and Environment (DCCA) – Pre-2020 |
| EAO | Environmental Awareness Officer |
| ELT | End-of-Life Tyres |
| ELV | End-of-Life Vehicles |
| EMR | Eastern Midlands Region |
| EPA | Environmental Protection Agency |
| EPR | Extended Producer Responsibility |
| EU | European Union |
| FHW | Farm Hazardous Waste |
| IWMA | Irish Waste Management Association |
| LA | Local Authority |
| LAPN | Local Authority Prevention Network |
| MRW | Municipal Residual Waste |
| NCAD | National College of Art and Design |
| NGO | Non-Government Organisation |
| NWCPO | National Waste Collection Permit Office |
| NWPP | National Waste Prevention Programme |
| NWSMP | National Wastewater Sludge Management Plan |
| OECD | Organisation for Economic Co-operation and Development |
| OGP | Office of Government Procurement |
| PMG | Price Monitoring Group |
| RWMPO | Regional Waste Management Planning Offices |
| RWMP | Regional Waste Management Plan |
| SEA | Strategic Environmental Assessment |
| SME | Small or Medium-Sized Enterprise |
| SRF | Solid Recovered Fuel |
| SUP | Single Use Plastic |
| SR | Southern Region |
| WERLA | Waste Enforcement Regional Lead Authority |
| WEEE | Waste Electrical and Electronic Equipment |
| WtE | Waste to Energy |

NON-TECHNICAL SUMMARY

Scope of the Evaluation

Waste management planning is the responsibility of the local authorities under Part II of the Waste Management Act 1996 and in June 2013, the three waste management regions of Connacht-Ulster, Southern, and Eastern-Midlands were established. In May 2015, each of the three regions published a Regional Waste Management Plan (RWMP) to cover the period 2015 to 2021.

A series of objectives, policies and actions in the RWMP set the framework for the prevention and management of wastes in a safe and sustainable manner in each region. These are administered by three Regional Waste Management Planning Offices (RWMPO).

The purpose of this report is to provide an evaluation of the progress achieved under the three RWMPs to meet the requirements of Section 22(2)(d) of the Waste Management Act and to provide a recommendation to review or replace the current plans. The findings of the evaluation process concludes that the current regional waste plans are to be replaced with a single national plan for the purposes of waste management.

A Shared Ownership Model

In terms of delivery, the evaluation has identified a high level of implementation by the RWMPO of the prescribed policies and policy actions across the eight strategic objectives. The majority of the prescribed actions were fully or partially delivered by the RWMPO to a high standard and the current framework for waste management planning in the regions has progressed significantly from publication of the current plans in 2015. Particular areas of success include establishing and building strong stakeholder collaboration with key industry players, coordinating and tracking waste data and managing information on treatment capacity.

However, the evaluation also points to a lower performance in achieving the three headline strategic targets of the waste plans covering prevention, recycling and landfilling. It is acknowledged that these targets were highly ambitious when first set in 2015 with a focus on the prevention of waste in the first instance coupled with maximising recycling and reducing the dependency on landfill. The absence of any meaningful progress on these targets over the plan period is a concern despite the positive evaluation of the RWMPO performance.

This contradiction illustrates one of the key issues for consideration in the replacement plan, i.e. the need for a shared ownership of the future plan and targets. While the RWMPO are tasked with providing the structure and framework for delivery of the targets, the local authority network is not solely responsible for the achievement of these targets. Furthermore, the RWMPO does not have the authority to control all operations in the waste sector to drive the changes to achieve these targets.

The changes required can only be achieved through a sector wide shared collaboration and ownership of the replacement plan and associated targets and policies. This collaboration requires active participation from all stakeholders (public and private) in a highly functioning waste collection, processing, recovery and disposal market coordinated by the RWMPO.

The need for a dynamic Plan

The second key consideration relates to the need for dynamism and flexibility to be built into the plan to allow the RWMPO to respond to evolving priorities, policy, legislation and market forces. Over the lifetime of the current plans there have been a number of policy and legislative changes that have shifted waste policy and legislative requirements including the EU Circular Economy Action Plan, the Waste Action Plan 2020 – 2025 and more recently the Circular Economy Programme 2021-2027.

In addition, there has been significant changes in the waste collection and treatment infrastructure implemented over the plan period resulting in a significantly modified industry landscape since the commencement of the plans 2015. When coupled with other significant external challenges such as the 2016 municipal residual waste capacity deficit or the 2020/2021 COVID-19 response, the waste sector can be viewed as a constantly changing and fluid system with evolving and dynamic priorities.

In this regard, it is important the replacement plan is sufficiently flexible to allow for a dynamic response to evolving issues over the lifetime of the plan. These evolving issues may include thematic or sectoral

prioritisation, market drivers for collection, treatment capacity and/or emergency responses to unforeseen events.

The current model of setting priority actions that apply for the six year plan period proved to be effective for progressing many policies, but was also overly rigid. It is suggested that the next plan replaces this structure with annual or biennial quantifiable actions developed as part of annual implementation plans. Such an approach in the replacement plan will lead to a more dynamic implementation model allowing the RWMPO to respond to issues as these arise over the plan period.

A Thematic Approach

While the defined legislative requirements for waste management plan content are prescriptive under Section 22 of the Waste Management Act, the replacement plan structure needs to provide an adaptable clear framework for delivery. The RWMPO has previously proposed setting out an alternative thematic approach to the plan promoting the following themes:

- Consumption of materials and generation of waste;
- Compliance with relevant waste management laws and policies;
- Capture of waste materials for treatment; and
- Circularity to tie each of the above together.

Such a thematic approach would be a departure from the current target and objective-led structure in the existing RWMPs, however, this approach will help to set more meaningful and thematic led targets to drive the improvements needed. This thematic approach is recommended for the replacement plan while ensuring all of the legislative requirements are suitably addressed.

Ireland's next Waste Plan

Ireland's National Waste Policy 2020 – 2025 'A Waste Action Plan for a Circular Economy' calls for the replacement of the existing Regional Waste Management Plans with a single National Waste Management Plan containing targets for reuse, repair, resource consumption and a reduction in contamination.

The single plan will aim to build on the progress from 2015, strengthen national capacity and delivery while retaining a regional focus for implementation.

Development of this National Waste Management Plan commenced in 2021 and will be informed by the outcomes of this evaluation.

1 INTRODUCTION

In July 2012, Government waste policy¹ recommended the consolidation of the previous ten waste regions in the State to a maximum of three regions as follows:

- The Southern Waste Region;
- The Eastern Midlands Waste Region; and
- The Connacht Ulster Waste Region.

In May 2015, each of the three regions published a Regional Waste Management Plan (RWMP) to cover the period 2015 to 2021 and within the three plans the following targets and actions were prescribed:

- 3 headline strategic targets covering prevention, recycling and landfilling and these are common to the three plans;
- 8 strategic objectives which set out the region's statement of intent for each of the plans which are also common to the three plans;
- 43 policies to achieve the overarching strategy and targets of the plans which are common across the three plans; and
- 63 policy actions implementing each of policies listed with only minor differences between the three plans.

These policies and objectives set the framework for the prevention and management of wastes in a safe and sustainable manner in each of the three regions and these are administered by three Regional Waste Management Planning Offices (RWMPO).

Article 28 of the EU Waste Framework Directive (2008/98/EC) requires Member States to include '*an evaluation of how the plan will support the implementation of the objectives and provisions of this Directive*' as part of the waste management plan process. The Directive has been transposed into Irish law in the European Communities (Waste Directive) Regulations 2011-2020², and the Waste Management Act 1996, as amended. Section 22(2)(d) of the Act requires waste management plans to be evaluated at least once in each period of six years after the date of making of the plan.

The purpose of this report is to provide an evaluation of the progress achieved under each of the three RWMPs to meet the requirements of Section 22(2)(d) of the Act. The evaluation will systematically review all policy actions and strategic targets and sets out the details for achievement of each of the headline targets, strategic objectives, policies and policy actions. The evaluation also provides recommendations to inform the next phase of waste management planning which commenced in 2021.

¹ A Resource Opportunity - Waste Management Policy in Ireland, Department of the Environment, Community and Local Government, July 2012

² The European Communities (Waste Directive) Regulations 2011 – 2020 include both S.I. No. 126 of 2011 and S.I. No. 323 of 2020.

2 EVALUATION METHODOLOGY

2.1 Overview

This evaluation has followed the methodology set out in the technical guidance document ‘*Evaluation of Regional Waste Plans – technical support working document*’ issued by the National Waste Co-ordination Committee in 2012.

2.2 Evaluation Planning

In order to provide a robust and systematic evaluation of the policy actions contained within the RWMPs, a template was developed to provide a structured approach to analysing the information gathered. This template is designed to meet the objectives of the evaluation in a clear and unambiguous manner and to address each of the following elements;

- Details of the RWMP policy action – targets, timelines, responsibility, etc.;
- Summary evaluation – with quantified and qualified metrics of the extent of achievement;
- Legislative changes relevant to the policy action;
- Environmental considerations relevant to the policy action; and
- Consideration of the relevance of the policy action for consideration in the next phase of waste management planning.

The template was provided to the RWMPO on a phased basis for each of the Strategic Objectives with the RWMPO invited to provide evaluation details for each of the policy actions. These details were supplemented with additional technical, legislative and environmental analysis provided by RPS to complete the evaluation.

2.3 Evaluation of Policy Implementation

The evaluation process was subsequently undertaken by applying a tiered approach as per **Figure 2.1** and as listed below:

- Tier 1 entailed the initial evaluation of the 63 policy actions by employing the *pro-forma* template devised;
- Tier 2 is an evaluation of the 43 policies within the RWMP and was informed by the Tier 1 policy action evaluation; and
- Tier 3 is the overall summary evaluation of the 8 strategic objectives and 3 strategic targets based on the Tier 1 and 2 evaluations.

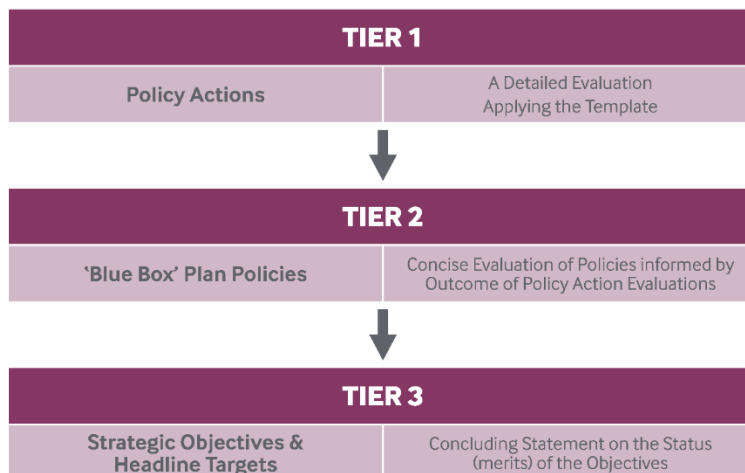


Figure 2.1: Three-Tiered Evaluation Approach

2.4 Review Legislative Requirements

Since the 2015 publication of the regional plans, there have been a number of key changes to policy that are relevant to this review and these are summarised below:

- In December 2015, the Commission adopted a Circular Economy Action Plan (COM (2015) 614) which has been updated in March 2020 (COM (2020) 98) as part of the European Green Deal. The new Action Plan announces initiatives along the entire life cycle of products, targeting their design, promoting circular economy processes, fostering sustainable consumption and aiming to ensure that the resources used are kept in the EU economy for as long as possible. Circular economy principles were addressed in the existing RWMPs to pre-empt this policy development; and
- In September 2020, the government published 'A Waste Action Plan for A Circular Economy – Ireland's National Waste Policy 2020 – 2025'³ and this policy document continues to shift the focus away from waste disposal and moves it up the production chain in line with the circular economy principles. This plan will be supported by an 'All of Government Circular Economy Strategy' to be published in 2021. One of the measures listed in the Waste Action Plan for a Circular Economy 2020-2025 relates to the revision of the existing three regional plans into a single national plan.

These policy changes will be noted through the evaluation of the plans and the development of recommendations for the next phase of waste management planning.

A review of the changes in legislation since publication of the plans in 2015 has been undertaken and the key change is the revised EU legislative framework on waste (Directive (EU) 2018/851). This Directive entered into force in July 2018 and sets clear targets for reduction of waste and establishes an ambitious and credible long-term path for waste management and recycling. This Directive has been transposed into Irish legislation through the European Union (Waste Directive) Regulations 2020 (S.I. No. 323 of 2020). One of the key features of this new legislation relates to a redefined set of requirements for Waste Management Plans under Section 22 of the Act, as amended, and these requirements are included in **Appendix A**.

In addition, there are a number of wider legislation changes with potential implications on the evaluation of the plans and these are listed in **Appendix B**. These legislative changes will be noted through the evaluation of the plans and the development of recommendations for the next phase of waste management planning.

2.5 Environmental Considerations

An environmental review of each of the policy actions has been undertaken to provide an analysis of the environmental impacts of delivery or non-delivery of each of the prescribed actions. This assessment was undertaken relative to the analysis presented in the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) documentation prepared for each of the plans in 2015.

2.6 Recommendations

The evaluation of the delivery of each policy action has allowed for a considered conclusion on the primary drivers in achieving or failing to meet the prescribed plan targets. This has also allowed for an analysis of the potential changes or otherwise to the policy actions presented in the 2015 RWMPs and how these may be omitted, revised, enhanced or retained in the future revision of the plans. These considerations are against the backdrop of the updated waste and environmental protection legislative and policy requirements. The outcome of this analysis is a detailed set of statements for each policy action that sets out the direction for the local authorities to consider in the revision of the RWMPs.

³ Available at: www.dccae.gov.ie/en-ie/environment/publications/Documents/55/Waste_Action_Plan_for_a_Circular_Economy.pdf

3 EVALUATION

3.1 Strategic Objective A - Policy & Legislation

Strategic Objective A: The Region will implement EU and national waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.

3.1.1 Policy Actions

The summary of the review of the five policy actions for Strategic Objective A is presented in **Table 3.1**. This evaluation indicates a generally moderate to high degree of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

Table 3.1: Evaluation of Policy Actions for Strategic Objective A

| Policy Actions | Evaluation |
|---|---|
| A.1.1 Move waste further up the hierarchy by eliminating the direct disposal of unprocessed residual municipal waste to landfill. | <p>This policy action cannot be fully evaluated without securing and verification of specific data to determine whether the target of complete elimination (i.e. 0%) unprocessed MRW going to landfill is fully achieved. On a wider context, Ireland's landfill rate for municipal waste reduced to 14% in 2018 but information is unavailable on the volume of this material that was unprocessed. Further data will be required to identify any movement of municipal residual waste (MRW) from sources (landfills / civic amenity sites (CAS) / transfer stations) which are not pre-processing (physical, biological, chemical or thermal processes, including sorting) MRW prior to consigning to landfill.</p> <p>This policy action is appropriately challenging and is relevant for consideration in the revised or replacement Plan, but the data required to measure compliance needs to be fully recorded as routine to close the current information gap. Future consideration should be given to imposing licence conditions to prohibit or restrict the acceptance of unprocessed municipal waste at landfills and Waste to Energy (WtE) facilities.</p> |
| A.2.1: Review the application fee structures related to regulatory activities for local authority facility authorisations. | <p>This action, scheduled for Q4-2016, was fully delivered by Q2-2017. The review was completed. Fees will require ongoing monitoring and adjustment, through the legislation, where circumstances change. The findings of the review were issued to Department of Environment, Climate and Communications (DECC) for implementation with a recommendation to amend the fees listed in Schedule 5 of the Regulations. DECC has advised that this legislative amendment is tied to a review of the primary legislation and the timeframe for review is unknown. This outcome remains relevant to the revised or replacement Plan, with the focus on DECC to amend the legislation as proposed.</p> |
| A.2.2: Review and implement (if appropriate) charging structures in place for wastes accepted at local authority civic amenity and other local authority waste facilities | <p>This recurring annual action was partially completed, on schedule, in the format envisaged for 2015-2017. This 2015-2017 review process highlighted a need for a more fundamental, systemic review of civic amenity sites (CAS) operations. This systemic review has been actively pursued since 2018 and has been finalised in late 2020.</p> <p>The review element of this policy action has been completed with two reviews completed but the annual frequency required has not been achieved. The need for an annual review is questioned and should be considered in the revised or replacement Plan. The implementation task is still outstanding, and the next plan, revised or replacement, needs to support the implementation of the fee structure recommendations of the 2020 CAS review report. In particular, the recommendation to develop a framework for a collective approach to the optimisation of income, the minimisation of costs, and consistency on gate fees, domestic and commercial.</p> |
| A.3.1: Prepare an annual report on the progress of policy actions and the implementation of mandatory and waste plan performance targets (refer to Chapter 5). | <p>This is a recurring annual action and was partially delivered, somewhat on schedule, but at reduced frequency and future actions are scheduled. The statistics used were necessarily based on most recent validated data available - from two years prior to the period when the report is generated. The time periods reported varied – the year 1 report covered a 12-month period, and the year 2 report covered an 18-month period.</p> <p>It is important to report on progress towards targets and indicators, but consideration should be given to altering the frequency of reporting and/or aligning the reporting schedule in parallel to the core statistics from the EPA. This action remains relevant for future reporting requirements and should also take into account any new dynamic or live</p> |

| Policy Actions | Evaluation |
|---|---|
| | reporting and data management regime implemented under the Waste Action Plan for a Circular Economy 2020-2025. |
| A.4.1: Monitor and report on planned, authorised and utilised capacity on a regional and national basis (building on the work done for the waste plan). | <p>A comprehensive quarterly report on Municipal Residual Waste Capacity is prepared by the RWMPO addressing capacity regionally and nationally. This reporting involves liaison with the final destination facilities, the cement kilns, the National TFS office and the EPA to gather the statistics to prepare the quarterly reports. The report also reviews the construction and demolition waste trends and deficits.</p> <p>This is a recurring quarterly action and was fully delivered on schedule with future actions scheduled. This is a critical requirement to provide ongoing data on capacities and remains relevant for the revised or replacement Plan.</p> |

3.1.2 Policies

A short commentary on the policies of Strategic Objective A is presented in **Table 3.2** and these are informed by the policy action evaluations.

Table 3.2: Evaluation of Policies for Strategic Objective A

| Policy | Evaluation |
|--|---|
| A.1 Take measures to ensure the best overall outcome by applying the waste hierarchy to the management of waste streams. | <p>The RWMPO have evaluated progress on the elimination of unprocessed MRW from landfill. Data availability limits the ability to quantify policy performance. Items that require consideration for 'replacement' policy actions to progress/evolve the plans under this policy include:</p> <ul style="list-style-type: none"> • The Waste Action Plan for a Circular Economy 2020-2025 recommends adoption of the food waste hierarchy as a priority order in food waste prevention and management. New plans must also take account of the food waste hierarchy in designing and implementing policy measures; and • Activities including reuse and preparation for reuse, charity shop liaisons and circular economy activities are higher in the waste hierarchy, ensuring the best overall outcome. <p>This policy remains relevant for the revised or replacement Plan with modification as outlined above along with a greater data collation to track progress.</p> |
| A.2 Implement the polluter pays principle across all waste services and regulatory activities in a manner appropriately reflecting the risk to the environment and human health. | <p>Policy is implemented through the policy actions in both areas targeted, i.e. the regulatory fees and the civic amenity charging structures.</p> <p>Local authorities have addressed the polluter pays principle by ensuring that civic waste management services achieve maximum cost recovery. For example, local authorities appropriately set civic amenity site (CAS) fee structures and recover costs for waste regulatory services. Some revision to CAS fee structures and regulatory application fees have been identified under this policy for implementation in the revised or replacement Plan.</p> <p>As costs to local authorities change over time through evolving regulatory requirements, markets for recyclables, etc., the fees applied need to be monitored to ensure that the polluter does pay. Local authorities also consider how fees charged might indirectly encourage unsustainable waste management activities, while also delivering the polluter pays principle. This aspect will be considered in the CAS implementation plan for CAS Review Report.</p> <p>Local authorities also address the polluter pays principle through measures to control and manage unsustainable waste management activities including litter and fly tipping.</p> <p>This policy remains relevant for the revised or replacement Plan but with a renewed focus on the evolving fee structures proposed from the CAS Review and under the Waste Action Plan for a Circular Economy 2020-2025.</p> |
| A.3 Contribute to the improvement of management performance across all waste streams through the implementation of policy actions and monitor progress towards national targets. | <p>Key performance indicators relating to policy actions and targets have been used in the periodic reporting to facilitate improved waste management. This data management reporting is central to monitoring improvement of management performance. While periodic reporting provides a valuable monitoring regime to track progress, the non-availability of up to date waste data has been cited as a barrier to measuring performance and a more dynamic data reporting regime is required as recommended in the Waste Action Plan for a Circular Economy 2020-2025. The frequency of reporting should also be considered to maximise the balance between performance management and data availability for reporting.</p> |

| Policy | Evaluation |
|---|--|
| | <p>The message delivery method has traditionally been delivered in written report format but the RWMPO released the 2020 annual report in video format which may assist in target achievement by getting the message to wider groups and extracting additional value from the output.</p> <p>This policy remains relevant for the revised or replacement Plan but the lower tier actions on reporting and data management should be reflective of any new system developed under the Waste Action Plan for a Circular Economy 2020-2025.</p> |
| <p>A.4 Aim to improve regional and national self-sufficiency of waste management infrastructure for the reprocessing and recovery of particular waste streams, such as mixed municipal waste, in accordance with the proximity principle. The future application of any national economic or policy instrument to achieve this policy shall be supported.</p> | <p>The quarterly reports on MRW and C&D waste management capacity are a mechanism to monitor achievement of this Policy. National economic or policy instruments to achieve this policy will be supported. Regional Waste Management Planning Offices inputs to planning and other processes consider these principles. This policy remains relevant for the revised or replacement Plan.</p> |

3.1.3 Strategic Objective A

Evaluation of Strategic Objective A indicates generally moderate to good progress towards achieving indicators with qualitative and quantitative indicators enabling easy evaluation of progress. There has been some progress beyond the indicator target measures delivering on the overarching policy. For example:

- Production of policy action A.3.1 data in video format will deliver messaging to a wider audience; and
- The root-and-branch review of the CAS network extends to a wider remit than the review of charging systems set out by policy action A.2.2.

The revision to the Plan must focus strongly on implementation of the circular economy approach which is the cornerstone of current and future EU and national waste policy, legislation, guidance and codes of practice. This is a clear continuation of Strategic Objective A which should be continued but with a greater circular economy emphasis within the overarching objective.

A transition to a circular economy requires, and helps to deliver, increased national self-sufficiency including for waste management. It is recommended that waste management self-sufficiency, in the Irish context, be given increased focus during the next Plan period.

In terms of data management and flow, the recommendations for a more comprehensive, shared and timely reporting system within the Waste Action Plan for a Circular Economy 2020-2025, such as through a live reporting system, will aid in the management performance and capacity management elements of the objective. Once a successful dynamic and transparent reporting system is implemented, it will aid in the tracking of performance to targets, identifying capacity issues and helping to improve behaviour change.

Challenges remain in the management of unsustainable waste management activities - littering, fly tipping, illegal dumping - to deliver the polluter pays principle. These unsustainable practices were further highlighted with more local activities during the COVID-19 pandemic. It is recommended that unsustainable waste management activities be further prioritised for action during the revised or replacement Plan with specific actions.

The revised or replacement Plan is to consider the following:

- The wording of Strategic Objective A remains relevant for the next iteration of the Plan but with the inclusion of a clear reference to the circular economy;
- A policy to condition all landfill (and potentially WtE) licences prohibiting these facilities from accepting unprocessed municipal wastes to support the Waste Action plan target of reducing residual waste disposal to 10%;
- Adoption of the food waste hierarchy as a priority order in food waste prevention and management. The future Plan must also take account of the food waste hierarchy in designing and implementing policy measures *to halve food waste generation by 2030*;
- Revising the primary legislation to align with the fee structures in Schedule 5 of the Waste Management Facility and Registration Regulations for waste applications should be retained and progressed;
- The implementation of all recommendations published in the CAS review;
- Any revised data management and reporting system adopted is to support dynamic outputs informing quarterly reports on MRW management capacity to support planning and self sufficient capacity;
- A new system for improved reporting on the nature and extent of used textiles is also required to support tackling this waste stream; and
- The difficulty of management of wastes during emergencies (such as the 2016 capacity issue for municipal waste) was further highlighted by the COVID-19 response to significantly altered public waste management patterns. A response is needed as public health, environmental protection, and national targets remain in force during emergency situations. The coordination of a national response plan and crisis communication strategy for waste management in emergency situations is to be included in the future Plan.

3.2 Strategic Objective B - Prevention

Strategic Objective B: Prioritise waste prevention through behavioural change activities to decouple economic growth and resource use.

3.2.1 Policy Actions

The summary of the review of the Policy Actions under Objective B is presented in **Table 3.3**. The evaluation shows a high level of compliance with these policy actions with a significant degree of achievement to scope and time.

Table 3.3: Evaluation of Policy Actions for Strategic Objective B

| Policy Actions | Evaluation |
|---|---|
| B.1.1 Appoint, where the role does not exist, or retain the role of the local authority Environmental Awareness Officers (EAOs) on a whole-time/assistant basis to work on activities including the implementation of the waste plan on a local and regional basis. | Environmental Awareness Officers (EAO) have been appointed in most, but not all, local authorities. The public awareness elements of the RWMP are typically lead by the RWMPO and delivered by the EAO and, as such, these staff are critical to the delivery of real behaviour change under the plan’s objectives. The effectiveness of EAO roles may be threatened at four local authorities where the roles are being filled by part-time/assistant appointments. This policy action remains relevant for the revised or replacement Plan with all additional supports required for local authorities to appoint and retain EAO as required. |

| Policy Actions | Evaluation |
|---|--|
| B.1.2 Ensure an ongoing financial allocation is made in the local authority annual budgets to cover expenditure on waste prevention related activities over and above staff costs and any grant aid. | The RWMPO estimate that the combined annual figure for prevention/reuse, based on a €0.15 contribution per inhabitant, is €671,331 with additional funds supplied through the EPA's Local Authority Prevention Network (LAPN). Funding has been provided for a range of waste projects including eliminating single use plastics, addressing in-house waste minimisation issues, community grants supporting waste prevention initiatives, waste prevention at festivals and events, learning and education workshops and a variety of promotional materials. This policy action remains relevant for the revised or replacement Plan. The funding benchmark needs to be index linked and a review of the €0.15/inhabitant spend is recommended for the revised or replacement Plan. |
| B.2.1 Collaborate regionally on prevention initiatives and programmes targeting priority areas to raise awareness of the benefits of prevention and deliver campaigns with more impact and better value for money. | The RWMPO have ongoing regional project collaboration on prevention campaigns, the most significant of which was the development of the www.mywaste.ie website. Other successful collaborations include Reuse Month, Upcycle Challenge, European Week for Waste Reduction, Greener Christmas Campaign and Hazardous Prevention Projects. The policy action remains relevant under the revised or replacement Plan as continued collaboration between the regions will be central to the success of the plan and the Waste Action Plan. The action will need some revision to reflect the single national plan but with a regional focus. |
| B.2.2 Ensure existing documentation on sectoral waste prevention actions and programmes is catalogued, available and disseminated in region. New material on prevention will be produced to fill any sectoral needs or gaps identified. | The RWMPO have a current shared file system but are developing a cloud-based database which will allow for upload of the full documentation library for ease of access to all local authorities. The RWMPO estimate that there are approximately 2,000 documents and assets contained within the library. All information within the library is reviewed and updated on an ongoing basis by the RWMPO to ensure the most up to date information is provided and to inform the design of new waste prevention areas for attention and campaigns each year. This policy action remains relevant for the revised or replacement Plan. |
| B.2.3 Maintain the implementation of effective local prevention, awareness and education campaigns targeting households, communities, schools and businesses. | The RWMPO have successfully achieved the requirements of action B.2.3 throughout the plan period. As an illustrative example, in 2018 there were 691 Recycling Ambassador Workshops which directly reached 24,730 people and 121 reuse month events led by Local Authorities. This policy action remains relevant for the revision or replacement of the Plan with a focus aligned with the Waste Action Plan for a Circular Economy 2020-2025 and the legislative recycling targets. |
| B.2.4 Maintain, develop and integrate waste prevention measures and systems into all local authority offices and operations to best practice standards. | Some, but not all, local authorities have been able to implement this action in a timely manner. Due to variations between how local authorities operate, appoint waste service providers and record waste information, it has been difficult to identify an accurate baseline in all jurisdictions. The RWMPO are actively trying to resolve these issues and to encourage full compliance with this action. This policy action appears to have been ambitious in 2015 given the difficulties in setting a robust baseline in all local authorities. It is recommended that this policy action be refocussed on establishing an accurate baseline (such as through a common reporting and/or procurement model) and then with retention of a suitable target or targets in line with circular economy principles. |
| B.3.1 Establish regional and local structures and networks through the regional office to ensure effective, consistent and practical coordination and implementation of NWPP initiatives. | Prevention initiatives are agreed at Steering Committee level in each region and the actions are supported by the Operations Team and generally implemented by RWMPO and EAO Prevention Education and Green Business task group. This policy action remains relevant for the revised or replacement Plan. |
| B.3.2 Work with the committee and management team of the NWPP to contribute to the development of the Programme's initiatives and to report on the effectiveness of implementation and funding at regional and local levels. | The RWMPO have had ongoing representation on the NWPP committee meetings on each of the occasions where the committee has convened. As well as NWPP committee meetings, other meetings have been held with individual members of the NWPP team, to progress specific campaigns or projects as required. The RWMPO also set out a position paper on prevention prior to the EPA's review of prevention and participated in number of workshops on the review of the national waste prevention plan. This policy action remains relevant for the revised or replacement Plan. |
| B.4.1 Promote the prevention of hazardous wastes to households, communities and small businesses building on effective initiatives and | The RWMPO have delivered a number of such campaigns including the Greener Cleaning, Greener Gardening, Greener DIY, Paint Squirrel. In 2016 there were 31 campaigns, a further 10 campaigns in 2017 and in 2018 there were 11 campaigns resulting in a total of 52 campaigns over the plan period. This includes one day collections and awareness raising on prevention. This action remains relevant but will |

| Policy Actions | Evaluation |
|---|--|
| disseminating best practice throughout the region. | need to be refocussed to account for the revised National Hazardous Waste Management Plan and the planned collection systems for households to maximise the efficiency of the collection but also to ensure that this collection system does not hamper the prevention initiatives. |
| B.4.2 Work with manufacturers, designers, compliance schemes, and national authorities on the development of waste prevention measures for products and services. | <p>The Regions undertake a wide range of meetings under this policy action as follows:</p> <ul style="list-style-type: none"> • Meetings with Repak in relation to prevention and recycling of waste packaging; • Meetings with other PR schemes, such as those for WEEE, ELVs and ELTs schemes; • General meetings with environmental NGOs, EPA, DECC, NWCPO & WERLA; and • Meetings with the EPA and DECC representatives quarterly to discuss prevention projects and progress. <p>This policy action has a broad remit, and there is limited opportunity for the RWMPO to work with manufacturers and designers. It may be beneficial to revise this policy action to align with the prevention requirements for products under the Extended Producer Responsibility regime.</p> |
| B.4.3 Collaborate with other national authorities and agencies delivering communication and information campaigns to include messaging on waste prevention and recycling. | The Regions are represented on the National Communications Strategy Group which is chaired by The Department of Environment, Climate and Communications (DECC) (formerly the DCCAE) and other members include the EPA, REPAK and PMG. Meetings are held quarterly. Ongoing collaboration is evident through the implemented advertising campaigns, LAPN projects, food waste prevention and recycling – Recycling List Ireland and the www.mywaste.ie website. All members of the public were targeted through different media, for example radio and television, social media, and in particular cases there were billboard displays, and displays on buses and in busy commuter areas. This policy action remains relevant for the revised or replacement Plan. |

3.2.2 Policies

A short commentary on the level of achievement of the policies of Strategic Objective B is presented in **Table 3.4** and these are informed by the policy action evaluations.

Table 3.4: Evaluation of Policies for Strategic Objective B

| Policy | Evaluation |
|---|---|
| B.1 Local authorities in the region will ensure the resources required to implement waste prevention activities are available through the lifetime of the plan. | <p>Feedback from the RWMPO indicates that the resourcing by the local authorities under this policy is adequate but challenging. In some local authorities resourcing is limited to part time or assistant level which impacts on the achievement of these policies actions in those local authority areas. In addition, EAO retention has been cited as an issue by the RWMPO. A review of the funding model for staff resourcing is recommended to ensure that future waste prevention activities, including those under the Waste Action Plan, are suitably resourced.</p> <p>Similarly, the financial resources provided by Local Authorities is considered adequate but any additional supports would further aid the RWMPO function on waste prevention activities. The funding model should also be reviewed from the spend proposed in 2015 to account for both interim inflation as well as projected resourcing for the next six-year plan period. The review needs to be more rounded than a simple indexing and should reflect the increased RWMPO efforts under the revised or replacement Plan.</p> |
| B.2 Promote behavioural change and extend waste prevention activities through information campaigns, targeted training and local capacity building, working with households, communities, schools, business, and other public institutions. | The resourcing available under Policy B.1 has been used to successfully deliver a wide range of information campaigns, targeted training and local capacity building. The RWMPO have successfully collaborated in devising and implementing these campaigns and should be supported in the revised or replacement Plan in developing same through the retention of this policy. In addition, the prevention measures in the Waste Action Plan for a Circular Economy 2020-2025, the Second Circular Economy Action Plan and the EPA's National Programme for the Circular Economy (replacing the National Waste Prevention Programme) need to be incorporated into the subsequent policy actions. For example, there is a greater focus on food waste and the requirements of the Food Waste Prevention Roadmap will need to be actioned under this policy. |
| B.3 Build and maintain a strong partnership with the National Waste Prevention Programme. | The RWMPO have successfully built and maintained a strong working relationship with the key NWPP stakeholders, i.e. the EPA and DECC and the RWMPO have adequate representation on the NWPP committee meetings. |

| Policy | Evaluation |
|--|--|
| <p>B.4 Harmonise prevention activities in the region to link with the national hazardous management plan, producer responsibility operations and other related programmes (such as litter, sludge, water etc).</p> | <p>Under the current plan, the implementation of the prevention activities have been dictated by collaboration by the RWMPO to agree consistent messaging and implementation and then undertaken at a regional level by the RWMPO. With the revised or replacement Plan migrating to a single national plan with a regional focus this mode of operation can be maintained. This future implementation will require some modified actions to account for the following changes:</p> <ul style="list-style-type: none"> • The EPA is currently preparing the updated National Hazardous Waste Management Plan which is due for publication in 2021; • There is a new legislative requirement to implement a collection system for hazardous waste produced by households (Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020) – this may have implications for increased collection and a potential increased reporting volume for hazardous waste; and • The revised rules for Extended Producer Responsibility (EPR) schemes under the Waste Framework Directive and implementing regulations (Regulation 30A European Union (Waste Directive) Regulations 2011-2020). <p>Further harmonisation policies will be aided by the development of a single national plan, but the evolving legislative regime needs to be considered in updating this policy and the subsequent actions.</p> |

3.2.3 Strategic Objective B

Evaluation of the policies and policy actions under this Strategic Objective indicates generally good progress towards achieving the prescribed indicators. Of the eleven prescribed actions, ten of these have been delivered to a high standard illustrating the significant progress that the RWMPO have achieved in terms of prioritising waste prevention through these activities. Resourcing, messaging and collaboration on waste prevention have all been delivered by the RWMPO throughout the plan period with a number of policy and legislative changes on hazardous waste, food waste and EPR. This strategic objective remains relevant but may need more focus in the revised or replacement Plan.

However, while the messaging function under the RWMP has been delivered, it is noted that actual behaviour change and real waste prevention has been less successful. **Figure 3.1** shows the annual household waste managed for the period 2010 to 2018 and also the trend line for personal consumption of goods and services.

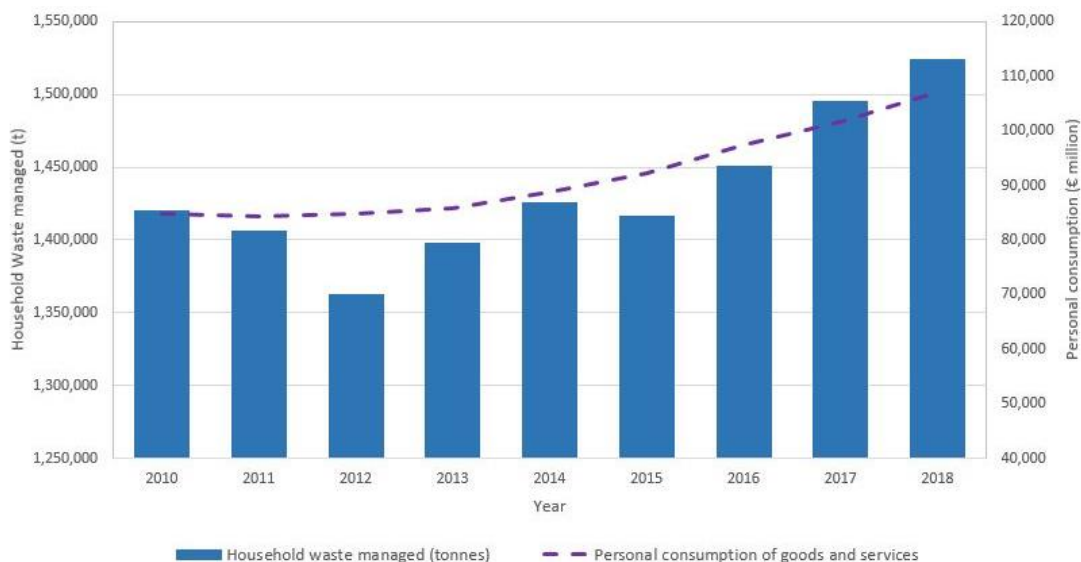


Figure 3.1: Ireland's Household Waste and Consumption of Goods and Services (source: EPA)

The data shows a clear correlation between income and waste generated and there is no evidence of significant decoupling of economic growth and resource use. It is noted that behaviour change is a slow process and the waste prevention initiatives launched through the existing plans may take some time to show a decoupling in future years.

The data trend highlights the need to continue to deliver messaging to the public to further drive greater behaviour change on prevention. As noted in the policy review, the funding mechanisms for these information

campaigns needs to be reviewed and greater resourcing provided to enhance the existing measures taken under this objective.

The revised or replacement Plan is to consider the following findings resulting from the evaluation:

- Strategic Objective B in its current form remains relevant and should be considered in the revised or replacement Plan;
- Resourcing of EAO at each local authority needs to be continued and enhanced to ensure key messaging mechanisms are maintained. There is a clear need for effective messaging to exact more pronounced behaviour change and support efforts to decouple waste generation from economic activity;
- Similarly, the allocation of future prevention funding per person needs to be index linked and future proofed for the lifetime of the revised or replacement Plan to ensure enhanced messaging is appropriately resourced;
- Prevention policy needs to be fully aligned with the policies presented in the Waste Action Plan and the Second Circular Economy Action Plan, e.g. the Food Waste Prevention Roadmap;
- The legislative driven changes to the Extended Producer Responsibility regime will need to be accounted for and actioned;
- The future Plan needs to be cognisant of the policies in the revised National Hazardous Waste Plan and the requirements to develop collection systems for households. The roll out of this system will improve regulation and reporting but may impact on the levels hazardous waste recorded in the State;
- There remains a need for all local authorities to consistently and clearly procure waste services to allow for generation of robust and transparent waste prevention data for all local authorities; and
- There is a need to establish a common waste procurement and reporting format for all local authority offices and operations to best practice standards to facilitate the integration of waste prevention measures and systems into these practices.

3.3 Strategic Objective C - Resource Efficiency and Circular Economy

Strategic Objective C: The Region will encourage the transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources.

3.3.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective C is presented in **Table 3.5**. This indicated a generally high level of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

Table 3.5: Evaluation of Policy Actions for Strategic Objective C

| Policy Actions | Evaluation |
|---|--|
| C.1.1 Engage with and facilitate enterprises in the development of repair and preparing for reuse activities. | The RWMPO have promoted the benefits of reuse among the general business sector throughout the plan period encouraging them to apply the reuse/repair concept within their own operation and/or to develop new enterprises around reuse, repair and preparation for reuse. The RWMPO engage on an ongoing basis with Community Reuse Network Ireland (CRNI) in the encouragement of members to develop enterprises which have a focus on reuse and upcycling of materials. The RWMPO had close association |

| Policy Actions | Evaluation |
|--|--|
| | <p>with SMILE Resource Exchange which, until it closed in 2018, promoted and facilitated reuse and materials exchange between organisations.</p> <p>This policy action remains relevant for the revised or replacement Plan with further consideration of the new National Circular Economy Programme and targets on reuse under the 2020 amendment to Regulation 31 (2) of the European Union (Waste Directive) Regulations 2011-2020 on preparing for re-use and recycling.</p> |
| <p>C.1.2 Review and amend (where appropriate) existing and/or condition the award of new local authority CA site contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations (WEEE will be considered subject to discussion and agreement with the compliance schemes).</p> | <p>A report on the review of CAS has been completed in 2020 and concluded that reuse and preparation for reuse and associated training/educational activities are inconsistent and unintegrated with a limited number of CAS active in this area. However, some CAS reported successful reuse partnerships with social enterprises, charities, or businesses and operations include segregation to facilitate offsite reuse/repair/preparation.</p> <p>There is no full quantification of reuse, repair or preparation for reuse of waste at CAS to demonstrate compliance with the 10% target.</p> <p>All CAS accept WEEE which accounts for 9% of materials accepted at CAS. An outcome of the CAS review is that CAS operators will be obligated to engage with Producer Responsibility Initiatives to evaluate options for facilitating reuse and repair (this is required as WEEE Compliance Schemes have ownership of the WEEE that is received at CAS).</p> <p>While the extensive review has been completed, this action needs to be refocussed on the implementation of recommendations for the CAS Review for the revised or replacement Plan.</p> |
| <p>C.1.3 Engage with the Community Reuse Network Ireland (CRNI) and other similar networks to develop a network of reuse/upcycling activities and promotional events.</p> | <p>The RWMPO engage on an ongoing basis with CRNI and each organisation promotes the other's activities, through social media and also through specific events, such as during Reuse Month. Examples of engagement with individual enterprises that are members of CRNI include Back2New upcycling in Newcastle West, Duhallow Enterprises in Kanturk, Revamp furniture upcycling in Co. Longford and EcoMattress in Dublin. This policy action remains relevant for consideration in the revised or replacement Plan.</p> |
| <p>C.2.1 Review/introduce presentation of waste byelaws, across the region, to maximise the quantity and quality of recyclable waste collected and amend/replace/introduce new byelaws if appropriate.</p> | <p>The existing waste presentation byelaws in the local authorities in each of the three regions were reviewed and a template produced for new byelaws to be adapted by each local authority. Through guidance and the template, this uniform approach to the byelaws has helped to ensure a consistent approach is taken across the local authorities, with some local variations as required in specific circumstances.</p> <p>The powers granted to the local authorities to introduce byelaws are under the Waste Management Act and the Local Government Act. This policy action remains relevant for consideration in the revised or replacement Plan in the event that any additional byelaws are needed in any future event.</p> |
| <p>C.2.2 Produce a code of practice for local authority authorised facilities to maximise the quantity and quality of material produced.</p> | <p>The RWMPO have confirmed that this Code of Practice has yet to be produced. There is an urgent need for a robust Code of Practice for facilities operating under a local authority permit or certificate of registration to drive consistency and best practice in environmental protection, reporting and waste outputs. Like the CAS review, this action remains relevant for the revised or replacement Plan but with an end date that will ensure early compliance.</p> |
| <p>C.3.1 Liaise with and support Economic Development Departments of local authorities in the identification of enterprises and potential clusters of enterprises for the development of secondary material markets</p> | <p>The RWMPO have engaged with Economic Development Departments, in particular the Local Enterprise Offices, to promote the general concept of waste hierarchy with priorities of prevention, reuse and preparation for reuse, recycling and recovery, as well as promotion of the Circular Economy in general. The RWMPO have participated in joint networking events and seminars involving the Local Enterprise Offices. Initiatives such as SMILE materials exchange, Green Business, EcoMerit Programme for SMEs and MODOS training were promoted strongly to the Local Enterprise Offices.</p> <p>Maintaining a market focus within the waste sector is important and the retention of this action in the revised or replacement Plan is required to facilitate the economic analysis and development of material markets and potentially indigenous infrastructure.</p> |
| <p>C.4.1 Prepare resource efficiency criteria for local authority waste related contracts.</p> | <p>The RWMPO have indicated that this review has yet to commence. As a consequence, there has been no general inclusion of resource efficient criteria in any contracts issued by the local authorities. There are individual projects whereby resource management has been applied to contracts, but no formal review of findings has been undertaken.</p> <p>One of the issues identified for failing to meet this policy action related to inconsistent approaches to procuring waste contractors and thereby measuring baseline waste data. The roll out of a more focussed GPP regime in the near future may drive this action</p> |

| Policy Actions | Evaluation |
|--|---|
| | further within the revised or replacement Plan but again, there is a need for the local authorities to show leadership in green procurement of waste contractors. |
| C.4.2 Implement a systematic engagement with local or regional local authority procurement officers and the Office of Government Procurement (OGP) to ensure the inclusion of resource efficiency criteria in contracts. | <p>The Regions' Prevention Officers took part in all workshops run as part of the Green Procurement GPP4Growth Interreg Project that was co-ordinated by DECC. The Prevention Officers advocated for green criteria and resource efficiency at these events which were attended by procurement officers and OGP staff.</p> <p>The EPA has initiated training in GPP for the public sector with a particular emphasis on those with procurement roles. Under the Programme for Government, all procurement using public funds will have to include green criteria by 2023.</p> <p>Engagement under this policy action has been implemented with the OGP as required. This engagement remains relevant for the revised or replacement Plan but it is recommended that the action be refocussed to a deliverable or outcome of the engagement.</p> |
| C.5.1 Encourage SMEs (including micro-enterprises) and industry to realise the environmental and economic benefits of resource efficiency. | <p>The RWMPO have engaged with support agencies such as Local Enterprise Offices, Business in the Community Ireland, Communities Creating Jobs and EPA-funded initiatives through LAPN, Green Business and the Green Enterprise Programme. There were also links with related supports such as Enterprise Ireland's Lean and Green supports and regional Lean networks, as well as Skillnets Ireland networks.</p> <p>The importance of the SME and industry sector to waste management is reflected in setting this policy action. To date the engagement has been detailed and positive and this remains relevant for the revision of the Plan.</p> |

3.3.2 Policies

A short commentary on the policies of Strategic Objective C is presented in **Table 3.6** and these are informed by the policy action evaluations.

Table 3.6: Evaluation of Policies for Strategic Objective C

| Policy | Evaluation |
|---|--|
| C.1 Establish reuse, repair, and preparing for reuse activities and networks to recirculate and extend the lifespan of items. | <p>The RWMPO have been proactive and have successfully delivered the enterprise engagement requirements required under this policy to drive the broader messaging on reuse, repair, and preparing for reuse activities. However, the requirements to implement change at the local authority owned or operated CAS sites have not been achieved and the 2020 CAS review concluded that reuse and preparation for reuse and associated training/educational activities are inconsistent and unintegrated, with only a limited number of CAS active in this area. A recommendation to implement the findings of this review as a policy action for CAS has been noted.</p> <p>With a set of revised legislative targets for reuse under Regulation 31(2) of the European Union (Waste Directive) Regulations 2011-2020, this policy is given greater focus and the policy may be revised to focus on the key targets and timelines. In particular, the phased increase in re-use/recycling of municipal waste can be used to focus the establishment of activities and networks within the revised or replacement Plan.</p> <p>In addition, as set out in the Waste Action Plan for a Circular Economy 2020-2025, the imposition of a waste recovery levy of €5 per tonne on recovery operations at Municipal Solid Waste (MSW) Landfills, Waste to Energy Plants and Co-Incineration Plants and the Export of MSW may further help drive greater reuse and repair activities.</p> |
| C.2 Optimise the value of recycled and residual waste resources in the system to turn these materials into reliable sources of secondary raw materials for reprocessing and recovery. | <p>Regulation 31 of the European Union (Waste Directive) Regulations 2011-2020 allows for re-use networks to access waste held by collection schemes or facilities with a view to increasing the value of recycled and residual waste resources in the system. However, the actions under this policy indicate that there has been no development on the code of practice for local authority authorised facilities to maximise the quantity and quality of material produced. In addition, with the pending implementation of the CAS review, these actions are critical to ensure that the material outputs from these local authority-controlled facilities are optimised. This upstream optimisation is required to facilitate the generation of reliable sources of secondary raw materials for reprocessing and recovery. This policy remains relevant but requires greater urgency to implement change on the existing local authority controlled waste management sites.</p> |
| C.3 Identify and promote the growth of secondary material markets and enterprises in the | <p>While there has been ongoing successful engagement with local enterprises, as noted for policy C.2, the generation of reliable outputs from waste operators is a pre-requisite to the successful growth of secondary material markets. Again, the local authority-</p> |

| Policy | Evaluation |
|--|--|
| region through regional and local supports. | controlled waste operators need to be consistent in best practice to facilitate this policy and this needs to be addressed in the revised or replacement Plan. Also noted in relation to this policy, there is a planned separate collection system for textiles in 2025 which may further contribute to this policy and this needs to be accounted for within the revised or replacement Plan. |
| C.4 Contribute to the greening of public procurement in local authorities through the inclusion of resource efficient criteria in all tendering processes related to waste plan activities. | The RWMPO have identified that there is currently no standard approach on green procurement adopted within the local authorities in relation to waste management. The absence of this standard has resulted in an inconsistent approach where some local authorities have been proactive and others have had limited compliance with this policy. To show stronger leadership there is a need for this policy to be strengthened in the revised Plan to compel all local and public authorities to show leadership and through the inclusion of resource efficient criteria in all tendering processes undertaken. |
| C.5 Work with and through business support agencies and the National Waste Prevention Programme to encourage businesses and industry to implement resource efficiency principles including the use of clean technologies and preventing waste at source. | The RWMPO have been successful in collaborating with business to promote the benefits of implementing resource efficiency principles. Stronger local authority leadership (e.g. through policy C.4) would lend greater credibility to the engagement and collaboration with enterprises on resource efficiency. This policy action remains relevant for the revised or replacement Plan. |

3.3.3 Strategic Objective C

Overall the RWMPO achieved a generally high level of achievement of the actions under this objective with significant gains in developing collaborative networks and partnerships and furthering transition from a waste management economy to a green circular one. Areas for improvement relate to the local authorities' own operations both for waste sites and procurement of waste services which can be more effective through greater coordination.

The core of this objective, i.e. the transition from a waste management economy to a green circular economy, remains relevant and is strengthened by the policies outlined in the EU's second Circular Economy Action Plan (2020) and the Waste Action Plan for a Circular Economy (2020). In this regard, the objective was suitably future orientated when published in May 2015 and remains relevant for the revised or replacement Plan. The objective will be further strengthened through the introduction of additional legislative targets for the preparing for re-use and the recycling of waste materials introduced under the European Union (Waste Directive) Regulations 2011-2020 as follows:

- *By 2020, the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 % by weight;*
- *By 2020, the preparing for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste shall be increased to a minimum of 70 % by weight;*
- *By 2025, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 55 % by weight;*
- *By 2030, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 60 % by weight; and*
- *By 2035, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 65 % by weight'.*

The RWMPO have successfully implemented the awareness and behaviour change elements under the policy and there have been comprehensive and frequent discussions with SMEs, industry, Local Enterprise Offices (LEOs) and other stakeholders such as the Community Reuse Network Ireland (CRNI). This positive engagement is in driving both the re-use/repair principles at waste generators as well as promoting the interest in markets for secondary materials and the re-use/repair industry. These elements of the policy have been positive and remain relevant for the revised or replacement Plan.

The development of markets for secondary materials does rely on a reliable and high-quality supply of these materials and the quality of the infrastructure is the key element for this supply. As noted, under Objective A, a detailed review of CAS infrastructure highlighted significant inconsistency in how these facilities undertake activities such as reuse and preparation for reuse with a lack of integration evident in this area. In addition, a planned code of practice for local authority waste facilities required under Objective C has yet to be delivered. Without these infrastructural actions being delivered, the source of materials suitable for re-use, repair or recycling remains inconsistent and unreliable. Implementing the actions arising from the review is a priority and the revised or replacement Plan is to support their delivery.

The revised or replacement Plan is to consider the following recommendations resulting from the evaluation:

- Given the ongoing transition, the Objective in its current form remains valid and relevant for the revised or replacement Plan;
- The updated targets for preparing for re-use and recycling to drive the further development of the re-use and repair industry;
- The implementation of the recommendations of the 2020 CAS review should be considered a priority to provide for a more integrated and consistent operation and to provide a higher quality waste output for re-use and repair;
- Developing a framework agreement for local authority CAS sites to consolidate the approach to segregating materials for reuse/preparing for reuse by compliance schemes and service providers; and
- The planned code of practice for local authority waste facilities is a priority to bring greater consistency to operations, management and prevention of wastes.

3.4 Strategic Objective D - Coordination

Strategic Objective D: Coordinate the activities of the Regions and to work with relevant stakeholders to ensure the effective implementation of objectives.

3.4.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective D is presented in **Table 3.7**. This indicated a high degree of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

Table 3.7: Evaluation of Policy Actions for Strategic Objective D

| Policy Actions | Evaluation |
|---|--|
| D.1.1 Participate in relevant national groups to formulate waste policy and practice. | <p>The RWMPO have participated in a range of national groups to formulate waste policy and practice. In many cases, a representative from one RWMPO has acted as a representative of the three RWMPO to streamline the process and maximise resource efficiency.</p> <p>This action is central to the role of the RWMPO and remains relevant for the revised or replacement Plan. As per current practice, the three regional coordinators can share this role to ensure resource efficiency. This collaborative approach supports the objective of a single plan to be implemented with regional focus.</p> |
| D.2.1 Establish and/or maintain funded regional waste management office and the requisite structures (including administrative, technical & communication) to | <p>A fully functioning RWMPO was established and maintained in each of the three Waste Management Regions throughout the lifetime of the RWMPs. All local authorities contributed the necessary funding each year throughout the plan to maintain the RWMPO with the assistance of annual grants from DECC. This action has served its purpose in establishing the offices and is relevant for the revised or replacement Plan in terms of maintaining these offices.</p> |

| Policy Actions | Evaluation |
|--|---|
| implement national and regional policy. | |
| D.2.2 Establish or maintain a Regional Co-ordinator, Regional Resource Efficiency Officer, Regional Prevention Officer, Technical Officer and administrative support. | Each of the three RWMPO has maintained the roles specified for Regional Co-ordinator, Regional Resource Efficiency Officer, Regional Prevention Officer, Technical Officer. In some cases, these roles are combined, and one staff member has several roles. All local authorities have contributed the necessary funding each year throughout the plan to maintain the RWMPO. This action needs revision for the continued maintenance and resourcing of these roles. Funding needs to be continued by the local authorities to support these roles. |
| D.2.3 Identify training needs and coordinate future shared training to develop knowledge and expertise at regional & local level. | Throughout the implementation period a number of training needs were identified and the RWMPO collaborated and liaised with relevant agencies and training organisations to arrange training. This was administered through the RWMPO Team Development Plan and all staff undergo Continuous Professional Development including specific courses of study (professional diplomas, etc.). Where appropriate, the RWMPO also encouraged local authority personnel to attend relevant training arranged or delivered by other organisations. This action is central to the needs of the function of the RWMPO and remains relevant for the revised or replacement Plan while incorporating the duplicate requirement of policy action H.2.3. |
| D.3.1 Establish partnerships to build knowledge capacity and to promote higher order waste activities (prevention, reuse, resource efficiency and recycling). | The RWMPO and associated local authorities have forged partnerships and wide-ranging networks to promote higher order waste activities. A sample of some of the successful partnerships established includes the Rediscovery Centre, the Community Resource Network Ireland (CRNI), Charity Shop Association of Ireland (CSAI), Free Trade, National College of Art and Design (NCAD), Economic Development Department of DCC, Cré, NWCPO, Repak and the IWMA. This policy action remains relevant for the revised or replacement Plan. |
| D.4.1 Review European and national calls for funding in waste, resource and research areas to identify opportunities and partners in the region and make appropriate applications. | The RWMPO have participated in nine calls for funding and have assisted EAOs and organisations within the network both formally and informally with many more. This policy action remains relevant for the revised or replacement Plan. |

3.4.2 Policies

A short commentary on the policies of Strategic Objective D is presented in **Table 3.8** and these are informed by the policy action evaluations.

Table 3.8: Evaluation of Policies for Strategic Objective D

| Policy | Evaluation |
|--|---|
| D.1 The Lead Authority on behalf of the region will participate in the national waste co-ordination group and other national groups relevant to the implementation of the waste management plan | The RWMPO have actively participated in a number of national waste co-ordination groups as outlined under policy action D.1.1 and this ensures that the RWMPO are at the forefront of policy decision making. This policy remains relevant for the revised or replacement Plan but it would benefit from a more general wording given the range of national waste groups currently in place and likely evolving through the Waste Action Plan for a Circular Economy 2020-2025. |
| D.2 The Lead Authority and local authorities will work together on the structures required to implement the waste plan, capacity building, training and knowledge share on delivering waste management activities. | Each of the structures required under this policy in terms of setting up the office, the personnel and training these personnel have all been successfully implemented by the RWMPO in conjunction with the local authorities. This policy has been largely implemented and is of relevance post the transition from regional plans to a single national plan. Some policy is required to ensure that funding is maintained for the RWMPO from the local authorities. |
| D.3 Foster links and activities with relevant stakeholders including businesses and Industry Groups, NGO's and other relevant networks (including cross-bordering networks) to extend the reach of the plan. | The RWMPO have been very proactive in applying this policy and developing collaborative links with other waste operators and further details are presented in relation to policy action D.3.1. These links have fostered collaboration and wider synergies in higher waste hierarchy and crisis co-ordination activities and this successful policy remains relevant for consideration for the revised or replacement Plan. |

| Policy | Evaluation |
|--|---|
| D.4 Work with key stakeholders, including government and industry operators, on the funding of local authority waste activities in the region and co-ordinate applications for relevant national and European funding. | Similarly, the RWMPO have sought to participate in funding for research and innovation and have had some success in this matter as listed in the review of policy action D.4.1. The RWMPO are establishing links with research institutions to further strengthen the RWMPO offering for future research calls. This policy action remains relevant for consideration in the revised or replacement Plan. |

3.4.3 Strategic Objective D

On establishing the structures for the three RWMP, a number of implementation policy actions applied under this objective to ensure effective coordination and implementation of policies. This has been achieved and the established structures will support the transition from a regional to national planning structure.

The revised or replacement Plan is to consider the following resulting from the evaluation:

- The overall focus of coordination within the objective remains relevant for the revised or replacement Plan but may move away from the development of the regional structures to maintenance of these structures under the Plan;
- Ongoing funding of the RWMPO will be required to maintain and build on the programme of delivery achieved under the current plans; and
- In relation to wider coordination, the RWMPO have fully committed to, and implemented, the policies on engagement with national policy makers, regulators, and research institutes. These collaborations and partnerships are a key cornerstone for the implementation of the existing plans and will inform the policy framework of the revised or replacement Plan.

3.5 Strategic Objective E - Infrastructure Planning

Strategic Objective E: The Region will promote sustainable waste management treatment in keeping with the waste hierarchy and the move towards a circular economy and greater self-sufficiency.

3.5.1 Policy Actions

No policy actions have been assigned to Objective E on infrastructure but the evaluation of the policies is presented in **Table 3.9**.

3.5.2 Policies

The policies in **Table 3.9** have been evaluated based on a review of the:

- RWMPO published bulletins on Waste Treatment Capacity Analysis which provides quarterly updates on waste recovery, disposal and export treatment and capacity
- Tracker of future capacity in the planning/licensing pipeline.

In addition, a range of additional sources have been referenced including the EPA website on waste statistics, EPA licensing portal, An Bord Pleanála website and local authority planning files and other supporting data.

Table 3.9: Evaluation of Policies for Strategic Objective E

| Policy | Evaluation |
|---|--|
| E1 Future authorisations by the local authorities, the EPA and An Bord Pleanála of pre-treatment capacity must take account of the authorised and available capacity in the market while being satisfied the type of processing activity being proposed meets the requirements of policy E2. | <p>A pre-treatment activity is defined as <i>'the processing of waste which still results in a waste which subsequently undergoes other waste recovery or disposal treatment'</i>. In May 2015 the RWMP reported the following levels of pre-treatment within the regions:</p> <ul style="list-style-type: none"> • 2.4 million tonnes in the Eastern Midland Region (53% of authorised treatment capacity); • 2.6 million tonnes in the Connacht Ulster Region (55% of authorised treatment capacity); and • 2.4 million tonnes in the Southern Region (53% of authorised treatment capacity). <p>It is recommended that a more detailed review of these capacities in 2021 is undertaken to inform the revised or replacement Plan.</p> |
| E2 The future authorisation of pre-treatment activities by local authorities over the plan period will be contingent on the operator demonstrating that the treatment is necessary, and the proposed activities will improve the quality and add value to the output materials generated at the site. | |
| E3a The local authorities in the region will maintain and develop their existing networks of bring infrastructure (e.g. civic amenity facilities, bring banks) to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes. | <p>There are 96 CAS operating within the State. The RWMPO undertook a detailed review of a selection of these CAS operations and a final report has been prepared in late 2020. The review identified an inconsistent approach to the facilitation of recycling and recovery of hazardous and non-hazardous municipal wastes. The report recommends the development of an integrated, consolidated and coordinated CAS network and that a CAS operating standard be developed to eliminate these inconsistencies. This standard will require CAS to maintain and develop infrastructure to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes to align with this policy.</p> |
| E3b The Plan supports the development by the private sector of public bring infrastructure (e.g. civic amenity facilities, bring banks) subject to appropriate statutory approvals and in line with appropriate environmental protection criteria. | <p>The private sector currently operate a number of CAS facilities within Ireland. The CAS review report recommends that these privately operated CAS be invited to meet the appropriate standards and to participate in the network and to benefit from the 'strength in numbers' effect of coordination with the network.</p> |
| E4 The local authorities may include as a condition of planning that developers of commercial and large-scale residential developments provide bring bank facilities to serve occupants and residents. | <p>Large residential developments are now assessed as Strategic Housing Development by An Bord Pleanála. Typically, these permissions include a requirement for <i>'A plan containing details for the management of waste (and, in particular, recyclable materials) within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials and for the ongoing operation of these facilities.'</i> This required plan needs to be prepared and agreed with the planning authority in writing prior to the commencement of development. An Bord Pleanála includes similar conditions for larger commercial developments such as shopping centres. Local authority permissions are more varied with a mixed application of planning conditions.</p> |
| E5 Local authorities will explore the possibility of accepting hazardous waste at existing civic amenity facilities from small businesses, which is similar in nature to household hazardous wastes currently received. A charge may be introduced for such a service. | <p>Some CAS currently accept hazardous waste but the approach to acceptance, limiting and charging for these wastes is inconsistent. The development of a standard procedure for these sites will greatly enhance consistency. This will be considered in the designation of sites when the implementation of the recommendations of CAS review is put in motion.</p> <p>Also of relevance is the recent amendment to Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020, which requires that the minister, EPA or the local authorities shall, by January 2025, set up separate collection for hazardous waste fractions produced by households. This pending change will have to be accounted for within the revised or replacement Plan and how this collection may affect the CAS function.</p> |
| E6 The local authorities may require waste developers | <p>A high-level screening has been undertaken of Waste Facility Permits (WFP) and Certificate of Registrations (CoR) issued by local authorities as listed in the central</p> |

| Policy | Evaluation |
|--|--|
| <p>seeking a waste facility permit to develop a Class 10 waste treatment activity, as defined by the Third Schedule: Part I of the Waste Management (Facility Permit and Registration) Regulations 2007 (as amended), to provide bring facilities for the acceptance of non-hazardous wastes from members of the public and businesses.</p> | <p>register hosted by the National Waste Collection Permit Office (NWCPO). This screening indicates that there has been no evidence of significant implementation of this policy and none of the WFP or CoR reviewed had applied to develop a Class 10 waste treatment activity. There may be operational and/or liability issues associated with the provision of public access to a permitted site and this policy, while welcome, may not be practical and its renewal should be reconsidered for the revised or replacement Plan.</p> |
| <p>E7 The local authorities in the region will continue to work with the EPA and other key stakeholders to support the collection of hazardous farm waste from designated bring centres e.g. marts.</p> | <p>In 2020, the EPA published the ‘<i>Farm Hazardous Waste Collections 2013–2017</i>’ report which provides a detailed summary and analysis of the farm hazardous waste (FHW) collections that were operated within the timeframe. The project was a collaboration between various agencies including the EPA and the local authorities. The report noted recommendations on the collection scheme for farm waste including the provision of permanent bring centres as well as direct collection. The development of these bring centres at key locations, such as marts, should be considered further in the revised or replacement Plan.</p> <p>The RWMPO and the Department of Agriculture, Food and the Marine (DAFM) have engaged in preliminary discussions on the requirements for the execution of a pilot scheme for a National Hazardous Waste Disposal Scheme. Any Pilot Project will take account of the findings of the Farm Hazardous Waste Collection Report and the national obligations relating to Antimicrobials and Pesticides which is required by legislation to be in place by 2022.</p> |
| <p>E8 The waste plan supports the development of disposal capacity for the treatment of hazardous wastes at existing landfill facilities in the region subject to the appropriate statutory approvals being granted in line with the appropriate environmental protection criteria.</p> | <p>In November 2020, An Bord Pleanála refused permission for the planned expansion at Drehid Landfill which included 85,000 tonnes per annum hazardous waste landfill capacity. The reasons for refusal related to environmental protection. Knockharley Landfill have recently received approval for a range of changes at the site including capacity to accept up to 5,000 tonnes per annum of stable non-reactive hazardous waste. The EPA license application decision is awaited which will also apply the appropriate environmental protection criteria. This policy remains valid and the EIA and AA processes indicate that the appropriate environmental protection criteria are being routinely applied by the Regulators and this policy remains relevant for the revised or replacement Plan and aligned with the EPA’s revision to the National Hazardous Waste Management Plan policies (due for publication in 2021).</p> |
| <p>E9a The on-going availability of disposal facilities for non-hazardous municipal residual wastes in the region will be required during the plan period. The local authorities consider there is no need to provide additional disposal facilities for residual wastes over and above the existing authorised (i.e. operational, inactive or uncommenced) facilities in place.</p> | <p>On a quarterly basis, the RWMPO collaborate to release up to date bulletins on Waste Treatment Capacity Analysis. The data presented within these bulletins provides up to date details on the following:</p> <ul style="list-style-type: none"> • Total annual disposal capacity within the active MSW landfills; • Quarterly landfill rate to each of the landfills; • Volume of void space used within the quarter; and • Remaining void space available for the year. <p>The up to date bulletins are used to track landfill utilisation and highlight any emerging capacity issues within the disposal sector and identify alternative routes as required. These bulletins provide valuable data on recovery and export as well as disposal and these should be continued in line with this policy in the revised or replacement Plan.</p> |
| <p>E9b The waste plan supports the need for on-going disposal capacity to be developed for on-site generated non-hazardous/hazardous industrial waste over the plan period.</p> | <p>A number of the larger pharma-chem facilities in Ireland are licensed by the EPA to operate industrial incinerators for disposal of on-site non-hazardous/hazardous industrial waste. These consist of both liquid vapour incinerators (LVI) for treating solvents and solid waste incinerators (SWI) for treating contaminated PPE, packaging, etc. In recent years, the need for Solid Recovered Fuel (SRF) for the cement kilns has led to a general reduction in on-site disposal and the economic incentives to send this waste off site for blending and use of SRF has resulted in a reduced use of on-site LVI recovery. In addition, the costs to operate the LVI and SWI are increasing relative to sending material off site (or export) and there is a general reduction in the use of these facilities. The need for self-sufficiency and the proximity principle would support the continuation of this policy in the revised or replacement Plan.</p> |
| <p>E10 The waste plan recognises the need for on-going disposal capacity to be available in</p> | <p>A pertinent application of this policy occurred in 2016 when municipal residual waste capacity hit a serious deficit with limited WtE recovery capacity available. This required the implementation of emergency powers under the Waste Management Act to allow</p> |

| Policy | Evaluation |
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| <p>response to events which pose a risk to the environment and/or health of humans and livestock. The local authorities of each region will monitor available contingency capacity annually.</p> | <p>this material to be sent to landfill and the permitted exceedance of the EPA waste acceptance limits on a temporary basis at these landfills. The RWMPO quarterly bulletins provide significant value in tracking recovery and disposal capacity to project such incidents but this emergency policy remains relevant for the revised or replacement Plan to account for other unforeseen events, e.g. COVID-19. The RWMPO have produced the National Waste Contingency Strategy/Addendum which looks at the provision of short medium and longer term contingency capacity and the protocol for using this capacity.</p> |
| <p>E11 The plan supports the consideration of appropriate alternative future land uses at authorised inactive landfills (un-commenced, permanently closed, or temporarily closed) subject to amendments to existing approvals being put in place. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure protection and preservation of the Natura 2000 Network.</p> <p>Potential activities include:</p> <ul style="list-style-type: none"> • Waste treatment activities including pre-treatment, thermal recovery, biological treatment, reprocessing or preparing for reuse; • On-site temporary storage of waste and materials; • Co-location of utility services such as wind farms or other energy generating activities; • Development of public and recreational amenities; • Co-locating recycling/reuse waste enterprises on site; • Resource mining; and • Contingency capacity for crisis events such as risks to the environment and to the health of humans and livestock. | <p>Authorised landfill sites remain an attractive option for the development of alternative land uses such as those listed under the policy. In particular, the development of operations that combine recovery and renewable energy (such as anaerobic digestion (AD)) are well suited given the established gas engines and grid connection at these sites. In addition, the land use zoning would support the development of a broad range of waste activities at these landfills. However, local authorities have shown limited appetite for such development over the plan period.</p> <p>There has been significant development of public and recreational amenities with a number of former municipal landfills converted to public parks – e.g. the former Kinsale Road Landfill is now Tramore Valley Park with walkways, BMX facilities and open parkland. Similar transitions are being undertaken at Ballyogan and Kerdiffstown. To inform these transitions, the EPA have published a report ‘<i>Beneficial Use of Old Landfills as a Parkland Amenity</i>’ in 2017.</p> <p>There has been limited or no application of uses such as utility services or resource mining though these potential uses remain valid.</p> <p>This policy remains relevant and it is recommended that a greater emphasis be placed on local authorities supporting the location of operations such as AD on former landfill sites where there are existing infrastructure capacities to support co-location.</p> <p>In August 2020, the Department of Agriculture, Food and the Marine (DAFM) published guidance on ‘<i>Woodland Creation on Public Lands</i>’ which is a funding scheme that aims to conserve nature by developing permanent, non-commercial woodlands on suitable public land. The scheme acknowledges that certain former landfill sites or ‘brownfield’ sites may be suitable for woodland establishment.</p> |
| <p>E12 The waste plan supports the repatriation of residual waste illegally disposed in Northern Ireland to licensed disposal facilities appointed to a framework set up on behalf of the State by the National Trans Frontier Shipment Office.</p> | <p>The repatriation of this waste is currently on hold due to on-going capacity shortages annually. This policy action remains relevant for the revised or replacement Plan.</p> |
| <p>E13 Future authorisations by the local authorities, the EPA and An Bord Pleanála must take account of the scale and availability of existing back filling capacity.</p> | <p>Backfilling of inert waste is regulated by the local authorities through WFP and CoR and by the EPA through soil recovery facilities. The RWMPO prepare periodic reports to quantify and analyse the national capacity within the market for the management of arisings of soil and stone material with the latest report prepared in 2020. While these reports are published, there is clear inconsistency in how the RWMPO are consulted by the relevant planning authority in making these planning determinations.</p> |
| <p>E14 The local authorities will co-ordinate the future authorisation</p> | <p>Within the revised or replacement Plan, due consideration should be given to establishing the RWMPO as a statutory body which will require the office to be</p> |

| Policy | Evaluation |
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| <p>of backfilling sites in the region to ensure balanced development serves local and regional needs with a preference for large remediation sites ahead of smaller scale sites with shorter lifespans. All proposed sites for backfilling activities must comply with the siting criteria set out in the plan.</p> | <p>consulted and considered as a statutory body for infrastructure planning and consenting processes and inform on the relevant capacities. This policy action remains relevant for the revised or replacement Plan.</p> |
| <p>E15a The waste plan supports the development of up to 300,000 tonnes of additional thermal recovery capacity of non-hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market and the State's self-sufficiency requirements for the recovery of municipal waste are met. This capacity is a national treatment need and is not specific to the region. The extent of capacity determined reflects the predicted needs of the residual waste market to 2030 at the time of preparing the waste plan. Authorisation above this threshold will only be granted if the applicant justifies and verifies the need for the capacity and the authorities are satisfied it complies with national and regional waste policies and does not pose a risk to future recycling targets. All proposed sites for thermal recovery must comply with the siting criteria set out in the plan.</p> | <p>On publication of the RWMP in May 2015 there was 435,000 tonnes per annum consented capacity for thermal treatment with a further 792,875 tonnes per annum pending. The total projected capacity assuming all pending was granted was 1,227,875 tonnes per annum and the review in 2015 suggested a further 300,000 tonnes nationally was required to take the total capacity to 1,527,875 tonnes per annum. Based on the 2020 thermal treatment development consented or within the planning/licensing regime there is an estimated 1,770,000 tonnes per annum of thermal treatment capacity within the pipeline. This would suggest that the required capacity under Policy E15a has been achieved by the developments in planning/licensing (subject to grant). However, the changing profile of waste recovery versus disposal and the ongoing reliance on exports may require further thermal treatment capacity. It is recommended that a detailed review of this capacity be conducted to inform the retention, modification or omission of this policy in the revised or replacement Plan. This review needs to consider the use of cement kilns as capacity option in Ireland as they are only available when there is a demand for cement product. This was an issue during the COVID-19 pandemic</p> |
| <p>E15b The waste plan supports the need for thermal recovery capacity to be developed specifically for the on-site treatment of industrial process wastes and where justifiable the treatment of such wastes at merchant thermal recovery facilities.</p> | <p>This policy is analogous to the on-site disposal policy E9b on recovery. A number of larger pharma operators have on-site treatment of industrial process wastes but the evolving economics is driving the off-site treatment or export of wastes from these sites to other operators. The retention of this policy is in line with the proximity principle and self-sufficiency but the retention within the revised or replacement Plan needs to be cognisant of the economic drivers that drive the need for on-site thermal recovery.</p> |
| <p>E16 The waste plan supports the development of up to 50,000 tonnes of additional thermal recovery capacity for the treatment of hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market to facilitate self-sufficiency needs where it is technically, economically and environmentally feasible. This capacity is a national treatment need and is not specific to the region. All proposed sites for thermal recovery must comply with the environmental</p> | <p>At present, the Carranstown WtE facility is licensed to accept up to 10,000 tonnes per annum of specified hazardous wastes. The Platin Cement Plant has planning permission to accept up to 50,000 tonnes per annum hazardous waste but a licence has yet to be granted. In 2021, the Ringaskiddy WtE facility has had the planning consent granted overturned in the courts and the future of this development is uncertain. It is recommended that a detailed review of this capacity is needed to inform the retention, modification or omission of this policy in the revised or replacement Plan.</p> |

| Policy | Evaluation |
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| protection criteria set out in the plan. | |
| <p>E17 The waste plan supports the development in the region of at least 40,000 tonnes* of additional biological treatment capacity for the treatment of bio-wastes (food waste and green waste) primarily from the region to ensure there is adequate active and competitive treatment in the market. The development of such treatment facilities needs to comply with the relevant environmental protection criteria in the plan.</p> <p><i>*Note this figure is 75,000 tonnes in the EMR region.</i></p> | <p>In May 2015, the RWMP reported a national capacity of 246,000 tonnes of treatment waste for organic wastes as authorised by the Department of Agriculture, Food and the Marine with the following regional breakdown:</p> <ul style="list-style-type: none"> • 58,000 tonnes in the Easter Midland Region; • 40,000 tonnes in the Connacht Ulster Region; and • 137,300 tonnes in the Southern Region. <p>Policy E17 varies between the three regions but combined the policy proposes 155,000 tonnes of additional capacity on top of the existing 246,000 tonnes per annum.</p> <p>The latest data from the EPA estimates that there are 687,660 tonnes per annum of biological treatment capacity (including composting, anaerobic digestion and bio stabilisation of organic fines). This data suggests that the capacities proposed within policy E17 have been achieved and exceeded over the plan period.</p> <p>Notwithstanding this achievement, it is recommended that a more detailed assessment of current and projected treatment capacity is undertaken to inform the revised or replacement Plan.</p> |
| <p>E18 The waste plan supports the development of biological treatment capacity in the region, in particular anaerobic digestion, to primarily treat suitable agri-wastes and other organic wastes including industrial organic waste. The development of such treatment facilities needs to comply with the relevant environmental protection criteria in the plan.</p> | <p>It is also noted that the revision to Regulation 38 of the European Union (Waste Directive) Regulations 2011-2020 has implications for this policy. By the 31st of December 2023 bio-waste must be either separated and recycled at source or collected separately and not mixed with other types of waste.</p> |
| <p>E19 The waste plan supports the development of indigenous reprocessing and recycling capacity for the treatment of non-hazardous and hazardous wastes where technically, economically and environmentally practicable. The relevant environmental protection criteria for the planning and development of such activities need to be applied.</p> | <p>In relation to hazardous wastes, the EPA is currently revising the National Hazardous Waste Management Plan and this is due for publication in 2021. The policies within this plan, coupled with the projected waste outputs from the annual EPA waste reports, ultimately dictate the potential of indigenous reprocessing and recycling capacity. Similarly, for non-hazardous wastes, the volumes and quality of the waste streams generated are key considerations for the development of infrastructure. Current barriers include low export costs and insufficient throughput to facilitate a viable treatment investment within the State. However, some indigenous reprocessing and recycling development has been successful (e.g. waste oil) and this policy remains relevant for the revised or replacement Plan.</p> |
| <p>E20 The waste plan supports the development of repair and preparing for reuse enterprises in the region as part of the transition to a more resource focused management approach and will provide technical, regulatory and financial guidance to operators active on this tier of the hierarchy.</p> | <p>This policy remains relevant with core circular economy principles applicable in the revised or replacement Plan. With the planned integration and consolidation of CAS network there may be an improved output from these sites that may further develop the repair and reuse opportunities.</p> <p>Also, of note is the amendment to Regulation 31 of the European Union (Waste Directive) Regulations 2011-2020. The revision requires measures to promote preparing for re-use activities, notably by encouraging the establishment of, and support for, preparing for re-use and repair networks, by facilitating, where compatible with proper waste management, their access to waste held by collection schemes or facilities.</p> |
| <p>E21 The local authorities will review the approach to authorising waste treatment facilities requiring a waste facility permit or certificate of registration having regard to the need to achieve consistency of approach between planning approval and operational capacity.</p> | <p>The National Waste Collection Permit Office (NWCPO) has established a Local Authority Waste Facility Register (http://facilityregister.nwcpo.ie/) that contains a searchable database of Waste Facility Permits and Certificates of Registration. This allows for full transparency to the general public on the permitting system and allows the local authorities to view current practice when setting infrastructure, handling, emissions, and other controls when authorising these waste treatment facilities.</p> <p>Also, of note is policy action C.2.2 which requires a code of practice for local authority authorised facilities to maximise the quantity and quality of material produced. This</p> |

| Policy | Evaluation |
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| | code of practice has yet to be produced but will further aid in the consistent setting of permit controls. |
| E22a The plan supports the primacy of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented. | <p>Most households (approx. 80%) in Ireland are served with kerbside collections in either a two-bin or three-bin service. This policy action remains relevant for the revised or replacement Plan. The Waste Action Plan for a Circular Economy provides for a more enhanced role for the WERLAs who will have responsibility for the monitoring and enforcement of Household Waste Kerbside Collectors in each region. This will include collection, recovery and disposal of the different household waste streams collected at kerbside.</p> <p>The consultation paper on Ireland's Deposit Return Scheme (DRS) sets out how PET plastic bottles and aluminium drinks cans will be introduced to allow for greater recycling of these streams through retailer take back schemes which will also aid in kerbside segregation.</p> <p>It is also noted that Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020 requires that by the 1st January 2025 a separate collection is set up for hazardous waste fractions produced by households. The details of this collection system are not yet clear; this will need to be addressed in the revised or replacement Plan for implementation and any modification to policy E22a noted accordingly.</p> |
| E22b The plan also supports the use of authorised civic amenity facilities and bring centres as part of the integrated collection system. | The 2020 CAS report contains a series of recommendations on integration and consolidation of the CAS network and the implementation of its recommendations will be a requirement of the revised or replacement Plan. In this regard, the CAS will offer a more integrated network of sites in line with this policy. |
| E23 In the absence of kerbside source segregated collection services and where the proximity of civic amenity facilities and bring centres is prohibitive the plan supports localised collection solutions such as community drop off points or pay to use systems subject to compliance with the household waste collection regulations. | This policy action remains relevant for the revised or replacement Plan. |
| E24 The plan supports the appropriate management of international catering waste ICW under the Animal By-product Regulations (EC) No.1069/2009. | This policy action remains relevant for the revised or replacement Plan. |
| E25 The plan supports the improvement of existing PRIs and the development of new PRIs or similar industry/voluntary schemes for specific waste streams including but not limited to human and farm chemicals and medicines, paints, newspapers and magazines and bulky waste. | <p>This policy action remains relevant for the revised or replacement Plan. It is also noted that the Waste Action Plan for a Circular Economy 2020-2025 commits to establishing a new extended producer responsibility scheme for single use plastics (SUP), extend the current tyre scheme and consider the following waste streams:</p> <ul style="list-style-type: none"> • Textiles; • Bulky waste including mattresses; • Paint; • Medicines; and • Farm hazardous waste. <p>The plan also commits to a revision of the current approaches to the EPR approval process, governance, transparency and financial rules to improve circularity. It is also noted that the new Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020 set out further rules and details for extended producer responsibility schemes.</p> |

3.5.3 Strategic Objective E

While there have been significant developments in sustainable waste management treatment infrastructure since the publication of the RWMP in May 2015, there remains scope for future developments under this objective. These developments need to be informed by analysis of existing and predicted generation rates

and treatment capacities to reduce the need for export and increase the role of higher waste activities such re-use, repair and recycle.

The revised or replacement Plan is to consider the following findings resulting from the evaluation:

- The wording of this objective remains strong and relevant;
- Establishing the RWMPO as a statutory body will provide a clear legislative role for the office to formally advise planning authorities on relevant policies, data and treatment capacity for waste infrastructure development;
- Completing a detailed inventory of national and regional final treatment (e.g. disposal, thermal treatment, biological, recycling) capacity, existing and planned. This is to include both existing and projected capacity taking account of reducing reliance on landfill as well as the principles of self-sufficiency. This process can inform the need for additional capacity to be mandated in the infrastructure policies;
- The consolidation and integration recommendations from the 2020 CAS review should be implemented to bring greater consistency in operation and output of these facilities;
- Further consideration of permanent or temporary bring centres for hazardous farm wastes to ensure this import infrastructure is supplied to manage this waste stream; and
- There is limited evidence of proactive land use planning by local authorities for future waste infrastructure. While city and county development plans are reviewed on a cyclical basis, the provision of policies or zoning for new waste infrastructure is largely absent from many land use plans. The introduction of new guidance for siting waste infrastructure is required to strengthen the locating of new facilities and minimise the impact on communities, business, ecosystems and environmental receptors.

3.6 Strategic Objective F - Enforcement and Regulation

Strategic Objective F: The Region will implement a consistent and coordinated system for the regulation and enforcement of waste activities in cooperation with other environmental regulators and enforcement bodies.

3.6.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective F is presented in **Table 3.10**. The Waste Enforcement Regional Lead Authorities (WERLA) coordinate and support local authority waste enforcement. The data used to undertake this evaluation is taken from the WERLA annual reports for the plan period based on local authority enforcement activities. The evaluation indicates a high degree of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

Table 3.10: Evaluation of Policy Actions for Strategic Objective F

| Policy Actions | Evaluation |
|---|---|
| F.1.1 Allocate resources to the systematic monitoring of household compliance with the segregation of waste with a particular focus on prioritising the reduction of contamination. | The WERLA commit ongoing resources to household waste inspections and report the numbers of inspections annually. In 2019, the WERLA undertook 8,491 household waste surveys (including monitoring of compliance with segregation requirements) and a further 1,421 household food waste inspections under this policy action (food waste surveys reduced from 3,092 household food waste inspections in 2018). This policy action remains relevant for the revised or replacement Plan with additional resources as required to support the WERLA enforcement function. |
| F.1.2 Allocate resources to the systematic monitoring of apartment complexes to | Apartments accounted for 12% of households in the State in 2016. However, there is no record available of the level of enforcement undertaken by the WERLA in this policy action. While significant enforcement has been undertaken on household and |

| Policy Actions | Evaluation |
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| improve compliance with the segregation of waste prioritising the reduction of contamination. | <p>commercial wastes, apartments have not been targeted, or if targeted, these inspections have not been clearly delineated from the enforcement data reported. It is noted that local authorities have used the presentation of waste byelaws at various locations to improve waste segregation at apartment blocks.</p> <p>With the necessary regulatory change in place to allow for apartment waste statistics to be either recorded with households, or as a separate but more targeted waste stream, this policy action remains relevant for the revised or replacement Plan.</p> |
| F.1.3 Allocate resources to the national systematic monitoring of waste collectors including on-site audits of waste collection data and random roadside checks for compliance with permit conditions. | <p>The WERLA report that there are 2,013 authorised waste collectors operating within the State in 2020 with 922 in the Eastern Midlands Region, 705 in the Southern Region and 425 in the Connacht Ulster Region. Inspection visits are undertaken annually and in 2019, the WERLA recorded 1,592 inspections of Waste Facility Permits and a further 226 multi agency inspections.</p> <p>The RWMPO validate Annual Returns (AR) of a selected number of WCP and AFP to ascertain the accuracy of data submitted to the NWCPO. The 2019 validation report was the fourth in the series and identified significant difference in the quality and accuracy of the data between the household and commercial waste collectors and the waste operators in the C&D sector. It is recommended to develop a risk based section criteria for future validation to focus on the higher risk operators and drive greater accuracy.</p> <p>This action is needed to further drive the need for enforcement of these waste collectors. In addition, the requirement for an assessment of existing waste collection schemes to inform the revised or replacement Plan and the timescale for a wider EU driven segregated collection will need to be taken into account in any revised action.</p> |
| F.1.4 Allocate resources to monitor the schedule for the roll-out of brown bins to households in accordance with the European Union (household food waste and Bio-Waste) Regulations 2013. | <p>Throughout 2019, considerable effort has been expended by the WERLA to ensure that the provision of a kerbside waste collection service includes the direct provision of a 'Brown Bin' to households in agglomerations > 500 persons in line with the European Union (Household Food Waste and Bio-Waste) Regulations 2015. This enforcement effort has included:</p> <ul style="list-style-type: none"> • Inspections under the Presentation of Waste Bye Laws to ensure that Householders are source segregating their waste; • Audits of Household Waste Collectors; • Referral of Household Waste collection permits for review by NWCPO; • Serving of Notices under Section 18 of the WMA on Household Waste Collectors to provide information on a monthly basis as to compliance with the Food Waste Regulations; • Serving of Notices under Regulation 10 of the Food Waste Regulations seeking information on the direct provision of Brown Bins; • Prosecutions of Household Waste Collectors for not providing the Brown Bin to their customers; and • Seeking an order in the High Court requiring the direct provision of the Brown Bin to customers. <p>This policy action remains relevant for the revised or replacement Plan with supporting implementation to further establish brown bins at commercial waste collections as well as to support the requirements for a separate collection system by December 2023.</p> |
| F.2.1 Prepare a regional RMCEI plan to prioritise enforcement actions and activities across the region taking account of the national enforcement priorities laid down by the EPA, DECLG and PROs. | <p>The WERLA work with the EPA to continuously streamline the annual inspection plans developed under RMCEI process in relation to the waste function in Local Authorities. This coordination is to ensure the local authority waste enforcement plans across the regions are consistent with the national waste priorities.</p> <p>This policy action remains relevant for the revised or replacement Plan to guide the ongoing enforcement policy and practice in a consistent manner. With the increased role, capacity and responsibilities of the WERLA as proposed under the Waste Action Plan for a Circular Economy 2020-2025, the scope and nature of the future enforcement may also be modified and this should be considered in any rewording of the revised Plan.</p> |
| F.2.2 Work in partnership with the compliance schemes and other bodies to address on-going regulatory obligations. | <p>In 2019, the WERLA recorded 611 inspections in relation to the Producer Responsibility Initiative (PRI) for the management of tyres and waste tyres (down from 947 inspections in 2018). Inspections focused on unregistered and revoked tyre retailers operating outside the regulatory framework. The pilot packaging enforcement project commenced in 2017 and is ongoing on a yearly basis. The project focuses on suspected major producers of packaging who are not meeting their obligations under the regulations. The WERLA also collaborated with WEEE Ireland, the European Recycling Platform Ireland DAC and the ELVES End-of-Life-Vehicle (ELV) compliance scheme.</p> |

| Policy Actions | Evaluation |
|---|---|
| | This policy action remains relevant for the revised or replacement Plan and suitably modified to account for the additional responsibilities the WERLA will have to cover the enforcement of Enforcement of Producer Responsibility Initiatives. |
| F.2.3 Maintain high level of site inspections of existing local authority waste authorisations and ensure that these are reflected in the RMCEI. | In 2019, the EPA have reported that there are 14,200 environmental licences/permits in the Local Authority Sector and 96% of these relate to waste activities. The WERLA report that over 41,000 waste inspections of these facilities were undertaken in 2018. This policy action remains relevant for the revised or replacement Plan. |
| F.2.4 Audit waste arisings from non-household waste premises (commercial and similar premises) to determine compliance with relevant regulations including commercial food waste regulations as reflected in the RMCEI. | In 2019, the WERLA undertook 1,476 commercial waste inspections under this policy action. This was an increase from 1,299 inspections in 2018. This policy action remains relevant for the revised or replacement Plan with additional resources as required to support the WERLA enforcement function. As noted under policy action F.1.3, the RWMPO undertake periodic validation the Annual Returns of a selected number of commercial premises. The findings of these validations exercised are published with the latest findings from the 2019 data validation published in January 2021. |
| F.3.1 Identify and maintain the role of Environmental Complaints Coordinator to manage an unauthorised waste activity database based on complaints received and monitoring undertaken. | The WERLA maintain a record of waste related complaints including both authorised and unauthorised waste activity with the following recorded in 2020: <ul style="list-style-type: none"> • Litter (excluding fly tipping and illegal dumping) - 49,204 complaints (98% investigation rate); • Waste, non C&D. Includes fly tipping and illegal dumping – 28,380 complaints (91% investigated); and • Waste and C&D - 850 complaints (91% investigated). The outcomes of these annual complaint investigations have identified the following: <ul style="list-style-type: none"> • 47 unauthorised waste facilities were identified at the end of 2018 by local authorities; and • 23 waste facility permits continuing to operate after their permit had expired at the end of 2018. It is recommended that the policy action be modified to allow for a wider complaint investigation regime for waste activities. |
| F.3.2 Carry out investigations and issue notifications, as required, as dictated by the unauthorised waste activity database and as directed by the EPA. | The % of unauthorised waste complaints investigated in 2020 is highlighted above. Unauthorised waste activity was identified as a national priority for 2019 and, to this end, the WERLA developed Guidance Documents and corresponding procedures to support Local Authorities and to highlight best practice in terms of operational tactics and the use of social media in enforcing unauthorised waste activity. A number of successful legal actions were taken based on this guidance. This policy action remains relevant for the revised or replacement Plan as part of the policy actions on enforcement. |
| F.3.3 Prepare action plan (subject to AA screening) to deal with the prevention and management of waste from significant unauthorised activities and waste arisings from other criminal activities. Co-ordination required between the regions. | The WERLA prepare this action plan annually and circulate to all local authorities for RMCEI planning. The plan is maintained and updated throughout the year. It is unclear to what extent, if any, these reports are subject to Appropriate Assessment. Again, this policy remains valid and should be continued in the revised or replacement Plan. The need for Appropriate Assessment Screening for an enforcement plan is questioned and this should be reviewed as part of the AA assessment of the Plan in 2021. |
| F.4.1 Work with NWCPO to standardise Waste Collection Permit conditions with standard mandatory conditions and local discretionary conditions. | The WERLA and the NWCPO have an ongoing engagement on setting mandatory Waste Collection Permit conditions. All permits are now presented within a database on the NWCPO website for transparency and this will facilitate the ease of reference for conditions between permits. This policy action remains relevant for the revised or replacement Plan for implementation at a time when greater detail is available on the requirements for segregation of waste collection services. |
| F.4.2 Move to standardise conditions for Waste Facility Permit/COR conditions with standard mandatory conditions and local discretionary conditions. | This is similar to policy action C.2.2 which calls for a code of practice for local authority authorised facilities to maximise the quantity and quality of material produced. Standardised WFP templates have been prepared by the RWMPO. Checklists for key priority wastes have also been prepared to complement these templates. The RWMPO have published this package of measures in April 2021. This pending standardisation is valuable for the sector and this policy action remains relevant to support the continuous improvement within the sector with additional templates as required. |

3.6.2 Policies

A short commentary on the policies of Strategic Objective F is presented in **Table 3.11** are these are informed by the policy action evaluations.

Table 3.11: Evaluation of Policies for Strategic Objective F

| Policy | Evaluation |
|--|---|
| F1 Enhance the enforcement of regulations related to household waste to ensure householders, including apartment residents, and owners are managing waste in accordance with legislation and waste collectors are in compliance with regulatory requirements and collection permit conditions. | Compliance with this policy is generally good with a well-established regime of systematic monitoring and inspection undertaken of household waste segregation, waste collection and brown bin implementation. This enforcement action has been successfully enhanced through the plan period to develop the current well-established regime with associated training and side line campaigns. The revised legislative recycling targets for municipal waste may require additional enforcement action over the lifetime of the revised or replacement Plan to support future compliance. It is also noted that Regulation 38 of Waste Directive Regulations 2011-2020 requires that, by December 2023, bio-waste is either separated and recycled at source, or is collected separately and is not mixed with other types of waste. These developments indicate a likely increased enforcement function for the WERLA under the lifetime of the revised or replacement Plan. |
| F.2 Enforce all waste regulations through increased monitoring activities, and enforcement actions for non-compliance with authorisations and regulatory obligations. | The WERLA show a very high compliance rate with this policy and a very detailed inventory of inspection planning, inspections and associated enforcement actions is undertaken, recorded and reported in a series of annual reports. The Waste Action Plan for a Circular Economy 2020-2025 notes that the role, capacity and responsibilities of the WERLA are to be enhanced to position the local authority sector better to respond to emerging and priority enforcement challenges. These include a greater focus on food waste prevention, tracking compliance with the updated recycling targets, the planned changes to the Producer Responsibility Initiatives, etc. This evolving and enhanced role of the WERLA under the Waste Action Plan for a Circular Economy 2020-2025 will likely require some revision of the actions applied under this policy within the revised or replacement Plan. |
| F.3 Take measures to prevent and cease unauthorised waste activities by way of investigation, notifications, remediation requests or legal action as appropriate. | The WERLA activities have largely complied with the requirements of this policy to date under the RWMP. Significant resources have been applied to complaint investigation and wider inspections across the waste sector in each of the authorities. However, there is no data on the level of resourcing applied to unauthorised waste activity, but the anecdotal evidence suggests that these complaints are prioritised and investigated as part of the wider enforcement function. There are a series of ongoing enforcement actions at varying levels and these are all reported on an annual basis and illustrated with sample case studies and details of prosecutions. This policy remains central to waste enforcement within the revised or replacement Plan. |
| F.4 Improve the consistency of local authority waste enforcement policy relies on a number of elements such as transparency, proportionality authorisations and conditions issued to waste collectors and facility operators. | Compliance with this policy has been limited over the plan period. Best practice waste enforcement policy relies on a number of elements such as transparency, proportionality as well as consistency. There remains a need for consistency in consenting local authority waste authorisations and setting associated conditions. To date, there has been limited formal movement on establishing consent consistency with the NWCPD and this needs to be reemphasised in the revised or replacement Plan along with clear implementation dates. Furthermore, the evolving nature of the waste streams collected, the greater emphasis on segregation, the potential inclusion of waste recycling targets and the requirements for financial provision are all emerging requirements that will require review and consideration for imposition to these consents under this policy. |

3.6.3 Strategic Objective F

Given the broad range of waste legislation that requires an enforcement function from the local authorities both on a routine and reactionary basis, there has been positive movement towards a consistent and coordinated system of regulatory activities by the WERLAs. While there are areas for greater implementation and consistency the application of this policy through the period of the plan has been largely delivered.

The EPA's '*Focus on Local Authority Environmental Enforcement - 2018 Performance Report*' (2020) provides a concise and independent critique of the local authority enforcement function. The EPA score the performance across a nine-point scale ranging from 'Unacceptable' to 'Exceptional' and over the course of the Plan period the waste enforcement function has been categorised as 'Target' or 'Above Target' which is a moderate score. The key areas for greater focus on enforcement as noted by the EPA are listed as follows:

- *Local authorities need to improve the quality and sharing of waste data with the relevant enforcement agencies. The quality and timeliness of waste data must be improved to provide critical intelligence to ensure that illegal waste activities can be detected and prevented.*
- *Local authorities should focus resources on identifying illegal waste activities. They should notify their Waste Enforcement Regional Lead Authority of any identified illegal waste sites and engage with it and other agencies to ensure that an appropriate and timely response is taken. This will require multiagency actions to ensure robust enforcement is taking place at difficult sites.*
- *Better waste segregation at source is required. Local authorities must focus on the householder and businesses who are responsible for the segregation of their waste to ensure that they are meeting their obligations. This includes focusing on waste streams including food waste and the provision and proper use of brown bins, and the proper segregation of commercial and demolition waste on the site where it is produced. This is likely to need a mix of educational actions and enforcement actions.*

The revised or replacement Plan is to consider the following findings resulting from the evaluation:

- The wording of this objective remains relevant;
- The Waste Action Plan for a Circular Economy 2020-2025 has noted that the role, capacity and responsibilities of the WERLA will be enhanced to position the Local Authority sector better to respond to emerging and priority enforcement challenges. This increased role needs to be clarified with suitable delivery framework set out;
- An expansion of activities for the WERLAs, as outlined in the Waste Action Plan for a Circular Economy 2020-2025 is being funded by DECC;
- The new recycling targets for municipal waste as well as the planned introduction of the recovery levy of €5 per tonne may encourage more unauthorised waste activity requiring greater enforcement; and
- Specific measures to tackle the volume of construction waste generated within the State and the historical and current challenges faced in managing this stream.

3.7 Strategic Objective G - Protection

Strategic Objective G: Apply the relevant environmental and planning legislation to waste activities in order to protect the environment, in particular European sites, and human health against adverse impacts of waste generated.

3.7.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective G is presented in **Table 3.12**. This indicated a mixed level of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

Table 3.12: Evaluation of Policy Actions for Strategic Objective G

| Policy Actions | Evaluation |
|--|---|
| G.1.1 Review local authority expenditure on lower waste order activities to determine if there is scope to deliver a more cost-effective service and balance expenditure across the hierarchy. | This policy action review has not been completed and there is no definitive information on % change in budget. The RWMPO have advised that undertaking this policy action and quantifying expenditure by these means is very difficult to achieve and the policy action in its current format has little value. However, while not reviewed formally under this policy action, performance is more generally reviewed as part of annual review when preparing the Annual Report for the Regional Waste Management Plan - the focus of the Plan is to move activities from lower levels to higher levels in the waste hierarchy. |
| G.2.1 Each region is to rank the class A high risk historic | The RWMPO have ranked all Class A high risk historic unregulated landfill sites as required under this action. The prioritisation action has been realised within the plan |

| Policy Actions | Evaluation |
|---|---|
| unregulated landfill sites (1977–1996). | period and this action is not required under the revised or replacement Plan and any requirements may be incorporated into action G.2.2. |
| G.2.2 Each region is to develop and agree a road map prioritising for investigation and remediation the ranked landfills (considering the scale of risk and impacts on the environment). | The local authorities agreed, via the Steering Groups, to prioritise the sites in accordance with the roadmap. This policy action remains valid and should be updated to require the roadmap prepared in 2016 to be updated within the timeframe of the revised or replacement Plan to include the findings of subsequent investigations. |
| G.2.3 Prepare authorisation applications to the EPA for landfill sites identified in accordance with the roadmap during the lifetime of the plan (subject to Department funding being available). | The individual local authorities are responsible for preparing and submitting the relevant applications to the EPA. In 2020 local authorities received funding to complete environmental risk assessments (ERA) and prepare authorisation applications for 64 unregulated landfills. This action remains relevant for the revised or replacement Plan to ensure that all landfills are identified and prioritised for funding and remediation as required. |
| G.2.4 Remediate high risk sites in accordance with the plan agreed in the EPA authorisation and in accordance with the requirements of the EU Habitats Directive & Water Framework Directive (subject to Department funding being available). | <p>The RWMPO have established historic landfill officer posts with one full time position within the SR/CUR and one part-time position within the EMR. These posts are funded by DECC. The DECC has also established a national steering committee to monitor the roadmap this includes DECC and the RWMPO.</p> <p>As of the end of 2020, not all high-risk sites have been remediated. To date only two high risk sites have been remediated (Sherman’s Co. Kilkenny & Moate, Co. Westmeath). The current status is listed as follows:</p> <ul style="list-style-type: none"> • Completion of Environmental Risk Assessment (ERA) - 16 of the high-risk sites are currently at Tier 2/Tier 3 investigation stages. Only 5 have a Tier 1 completed; • Certificate of Authorisation (CoA) application process - 9 of the high-risk sites are awaiting a decision on their CoA; and • Requirement to obtain planning approval from An Bord Pleanála - 7 of the sites with CoA granted need to obtain planning approval, prior to proceeding to remediation stage. It is anticipated that this number will increase further. <p>This policy action remains relevant for the revised or replacement Plan as clearly the requirements are still outstanding to remediate the landfills as required. The elongated remediation process will take time to sustainably execute these remediations and the timeframes for this policy action in the revised or replacement Plan need to be cognisant of same.</p> |
| G.3.1 Prepare siting guidelines for waste facilities and review general environmental protection criteria as set down in the waste plan. | The RWMPO has reviewed the general environmental protection criteria set out in the waste plan and determined that it would be appropriate to prepare siting guidance. Draft guidance has been prepared but the Department of Housing, Local Government and Heritage has indicated the need to apply the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) process to inform this guidance document and this will be prepared within the revised waste management Plan. While the draft guidance has been devised, this has no basis for implementation or statutory footing at present. The upcoming waste plan development process will incorporate the draft guidance for siting waste infrastructure. This will strengthen the process for locating of new facilities and minimise future impacts on communities, business, ecosystems and environmental receptors. |
| G.3.2 Undertake a risk assessment of all waste disposal sites in coastal and estuarine areas to identify those at risk from coastal erosion in the short, medium and long term. | The County and City Management Association (CCMA) are preparing a broader national erosion study report which is being led by Fingal County Council. The RWMPO have requested that the risk assessment of waste sites are addressed within this study. Some localised erosion studies have been prepared which do address waste sites (e.g. Portrane Rush study addresses the risk to Ballealy Landfill), but these are limited. This policy action remains outstanding and a greater clarity on the timeframe for the CCMA erosion study is required to inform the modification of this policy action in the revised or replacement Plan. Depending on the level of risk, it may be prudent to include an action to develop either a waste sector adaption plan and/or compel individual operators to develop an adaption plan under the revised or replacement Plan. |
| G.4.1 Identify areas of low collection coverage and survey householders who are currently not availing of a household waste collection | In 2017, the Competition and Consumer Protection Commission (CCPC) was requested by government to carry out a study of the ‘ <i>Operation of the Household Waste Collection Market</i> ’. The RWMPO made a submission to this process which again considered the issue of participation by households in kerbside collection systems. Current data indicates that 72% of households nationally are on kerbside systems, however the regional picture is varied with participation rates as low as 28% and as high as 99%. |

| Policy Actions | Evaluation |
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| service to determine the cause. | There are a range of factors influencing participation including the availability of civic amenity sites, viability of certain routes, operational considerations and illegal dumping. This policy action has been completed and these low coverage areas have been identified by the RWMPO under the plan period. The focus in this area for the revised or replacement Plan should relate to improving the management options available to these households, such as through greater integration and standardisation of CAS. |
| G.4.2 Design and implement a programme to regulate, enforce and communicate in areas with low collection coverage, including the negative health and environmental impacts of burning/illegal dumping. | Local authorities implement ongoing awareness and enforcement programmes to promote good waste management practices. This has been strengthened by the awareness campaign and follow up enforcement regarding policy action C.2.1 under which there has been a campaign on reviewed / new waste presentation byelaws. The RWMPO have also worked closely with the WERLA in order to ensure waste management and waste enforcement work in tandem to effectively implement relevant policies and priorities. This work plan formed a core focus of the waste enforcement plans prepared by individual local authorities. This policy action remains relevant for the revised or replacement Plan with the awareness elements tied into the new national communications and education programme specified in the Waste Action Plan for a Circular Economy 2020-2025 as well as the new targets for recycling. Enforcement recommendations are presented elsewhere under the evaluation of Objective F. |
| G.4.3 Engage with authorised waste collectors to design solutions to serve communities or areas of low collection coverage and implement the solutions | There is ongoing engagement between the RWMPO and authorised waste collectors, but no specific review has been completed. The number of households with kerbside collection services per annum are as follows: <ul style="list-style-type: none"> • 2015: 1,219,687 households with waste collection service nationally; • 2018: 1,328,220 households with waste collection service nationally; and • 2019: 1,315,242 households with waste collection service nationally. The difficulties identified by the RWMPO in gathering information on collectors should be used to inform the development of this policy action and the action suitably revised to enable the need for more direct engagement between the RWMPO and the waste collectors in this area under the revised or replacement Plan. |
| G.5.1 As part of the statutory review process under the relevant waste regulations, the local authorities will examine relevant waste authorisations requiring local authority consent to determine if AA screening is required. In addition, the local authorities will prioritise reviews of waste authorisations and requirements for AA screening, in advance of any scheduled review, based on the proximity to or potential pathway of the permit holder to European Sites. | All local authority authorisations require AA screening in accordance with the European Communities (Birds & Natural Habitats) Regulations 2011. To assist the local authorities, the RWMPO prepared an AA screening template to allow authorities to make the determination if a Stage II Appropriate Assessment (the Natura Impact Statement) is required for any consent. The RWMPO also prepared training content, which was delivered, on behalf the RWMPO, by Aster Environmental. The Aster Environmental Training course is accredited with Engineers Ireland. This policy action remains relevant for the revised or replacement Plan and potentially supplemented with further requirements on training and legal/technical support to local authorities in this area. |

3.7.2 Policies

A short commentary on the policies of Strategic Objective G is presented in **Table 3.13** and these are informed by the policy action evaluations.

Table 3.13: Evaluation of Policies for Strategic Objective G

| Policy | Evaluation |
|--|--|
| G.1 Ensure the highest environmental and human health benefits are achieved by prioritising the implementation of the upper tiers of the waste hierarchy | The implementation of this policy is somewhat achieved through the wider RWMPO function but there is no formal review and plan in place to prioritise funding and action for activities within the upper tiers of the waste hierarchy. It is noted that throughout this review there is clear evidence that the RWMPO are actively supporting and prompting these activities as per the policy. However, this policy should be modified as required to establish a framework for this prioritisation within the revised or replacement Plan that |

| Policy | Evaluation |
|--|---|
| and ensuring these actions are funded appropriately. | also accounts for the greater drive towards re-use and recycling in the Waste Action Plan and the evolving legislation. |
| G.2 Rollout the plan for remediating historic closed landfills prioritising actions to those sites which are the highest risk to the environment and human health. | Significant work has been undertaken through the plan period to identify and prioritise the historic closed landfills within each local authority. These elements are now complete and the process of undertaking the remediation works in priority order is being undertaken. However, progress through the remediation process is slow given the need for a significant period for site investigation and risk assessment, circa 12 months in the CoA application process and then a period to appoint and execute the necessary contractual works. These delays have slowed progress under this policy but the environmental protection required under this policy means that it remains a priority and the policy remains relevant for the revised or replacement Plan and the timelines for implementation reflective of current practice. |
| G.3 Ensure there is a consistent approach to the protection of the environment and communities through the authorisation of locations for the treatment of wastes. | Progress on this policy has been limited with draft siting guidelines prepared but these have yet to be implemented. Similar, the erosion risk assessment is underway but controlled by the CCMA and not the RWMPO. Without these spatial criteria to assist local authorities there is potential for inconsistencies and uncertainties in consenting and land use planning. It is noted that there is a lack of land use planning being provided for waste facilities in the development plans prepared in recent years. There is a need for this land use zoning and it is recommended that spatial information is provided as soon as practical under this policy under the revised or replacement Plan and furthermore, there is a requirement for local authorities to commit to zoning or policy setting for waste operations in land use planning. |
| G.4 Implement a co-ordinated approach to address unmanaged waste and the potential impact to the environment and human health. | There has been successful identification of areas of unmanaged waste collection areas by the CCPC and this information has provided a footprint of where additional services are required. Overall, the collection of household waste across the State has grown by 8% in the plan period but there remains the absence of a coherent single strategy to manage wastes in these areas. This strategy may include for increased collection or the implementation of a more integrated CAS network as noted elsewhere but it is recommended that this strategy is more clearly defined and actioned under this policy within the revised or replacement Plan. |
| G.5 Ensure that the implementation of the regional waste management plan does not prevent achievement of the conservation objectives of sites afforded protection under the EU Habitats and Birds Directive. | This policy action remains relevant for the revised or replacement Plan to ensure the ongoing protection of the Natura 2000 network. While the introduction of this policy has required additional resources and training for implementation by local authorities and has potentially delayed the consenting process at times, the protections offered to the natural capital within the State through this regime is fully aligned with EU and national environmental policy. |

3.7.3 Strategic Objective G

The principles of protection to human health and the environment from waste operations are central to EU and national policy on the protection of the environment. As such, the intent of Strategic- Objective G remains a requirement for the revised or replacement Plan to ensure waste management in the State is sustainable and offers the highest levels of protection.

The revised or replacement Plan is to consider the following findings from the evaluation:

- The intent of the objective remains relevant;
- Much of the actions required under the policy relate to protection, i.e. the protection of human health and the environment (siting guidelines), the Natura 2000 network (Appropriate Assessment) and climate change (coastal erosion). These issues remain pertinent and require greater emphasis and urgency needs to be applied to equip local authorities to plan for and consent future waste infrastructure;
- Establishing the new siting guidelines for waste facilities which will be further informed by the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes;
- The creation of a climate adaption plan in conjunction with key stakeholders for the waste sector with a focus on the vulnerability and potential at risk infrastructure;
- The timeframes for the remediation of historic unregulated landfill sites has been significantly longer than estimated in the RWMP. While there has been some progress at strategic level in prioritisation, the implementation at site level remains slow. A strong emphasis on the delivery of the remediation of these sites needs to remain to minimise ongoing pollution risks; and
- There is a lack of a specific approach under the objective to address the reduction in unmanaged waste across the regions. While progress has been made on establishing where unmanaged waste arises, a clear and consistent means to increase collection and management is absent.

3.8 Strategic Objective H - Other Waste Streams

The Region will establish policy measures for other waste streams not subject to EU and national waste management performance targets.

3.8.1 Policy Actions

The summary of the review of the policy actions for Strategic Objective H is presented in **Table 3.14**. It should be noted that Policy Action H.2.1 is varied between the three RWMP and each of the three actions are addressed within the table. This indicated a mixed level of achievement to scope and time and these have been employed to provide an evaluation of the corresponding policy actions.

Table 3.14: Evaluation of Policy Actions for Strategic Objective H

| Policy Actions | Evaluation |
|---|--|
| H.1.1 To engage with Irish Water in relation to national planning and management of wastewater treatment plant sludge and water treatment plant sludge. | In 2016, Irish Water published the first National Wastewater Sludge Management Plan (NWSMP) outlining the strategy for managing wastewater sludge over the next 25 years. An updated plan is due to be published in 2021. The total quantity of wastewater sludge generated in 2015 was 58,387 tonnes dry solids (tds) and over 98% of this was reused in agriculture. The quantity of wastewater sludge produced is expected to increase to 96,442 tds/annum by 2040. The RWMP have yet to engage with Irish Water on this plan or the management of wastewater treatment plant sludge and water treatment plant sludge to develop policy action. The action needs to be delivered and it is recommended that the RWMP engage with Irish Water annually to derive the policy action. In particular, the review of the National Wastewater Sludge Management Plan in 2021 should be aligned with the revised or replacement Plan to capture this waste stream. |
| H.1.2 To engage with the water pollution teams of the local authorities to ensure that | The local authorities actively record the quantities of septic tank waste collected annually. To date over the plan period, the Connacht-Ulster Region has collected 153,000 tonnes, the Eastern Midland Region has collected 256,000 tonnes and the Southern Region has collected 526,000 tonnes of septic tank waste (EWC 200304). |

| Policy Actions | Evaluation |
|--|--|
| environmental legislation and national guidelines are being implemented, including the inspection plan for the management of domestic wastewater treatment systems, and to review the management options for the disposal of septic tank sludge. | As with policy action H.1.1, it is recommended that there is greater engagement between the local authorities and Irish Water on reviewing the National Wastewater Sludge Management Plan in 2021, in particular the inspection plan, and the revised or replacement Plan, particularly in relation to sludge treatment capacity which is managed by Irish Water. |
| H.1.3 To engage with the NWCPO regarding specific conditions for private waste collectors collecting septic tank waste. | The RWMPO have yet to engage with the NWCPO regarding specific conditions for private waste collectors collecting septic tank waste. This action remains valid and it is recommended that this engagement is implemented in the revised or replacement Plan requiring the RWMPO to engage with the NWCPO regarding conditioning private waste collectors to standardising this operation and record keeping. |
| H.2.1 - Southern Region - To investigate the viability of running a pilot scheme for the management of paints. | A national pilot scheme for the management of paints commenced in 2021 through a partnership between the RWMPO, the Rediscovery Centre and Dulux Paints. The pilot scheme is likely to take a number of years to achieve national coverage which will be over the course of the revised or replacement Plan. This action should be cognisant of the emerging potential for paint to be managed through an EPR scheme as well as the evolving legislation on the need for collection of hazardous wastes from households. |
| H.2.1 Eastern Midland Region - To investigate the viability of running a pilot scheme for the management of medicines and waste oil. | <p>The Eastern Midlands RWMPO investigated the possibility of rolling out a pilot scheme for medicines. The investigation identified that there were already a number of projects in this area - such as the DUMP scheme in Cork and Kerry, where pharmacists agree to take back medicines, either generally or on specified days. Currently the EPA is investigating the viability of extending this scheme, or a similar scheme, to operate nationally and the EPA is in consultation with the Irish Pharmacists Union on this matter.</p> <p>Given the potential legislative and policy changes impacting on these waste streams, these requirements should be revised accordingly to accommodate the legislative or Waste Action Plan for a Circular Economy 2020-2025 requirements. The evolving EPR regime will likely focus the policy on waste medicines and this approach is recommended in the revised or replacement Plan. The requirement under Regulation 37 for separate collection, prohibition on mixing and priority to treat waste oils by regeneration should also be accounted for within the new action within the revised or replacement Plan.</p> <p>Again, this EPR action is captured elsewhere and this action may be removed from the future plan in its current specific form with a more open requirement for pilot studies retained.</p> |
| H.2.1 – Connacht Ulster Region To investigate the viability of running a pilot scheme for the management of farm chemicals. | <p>This policy action was superseded by the successful work of the national hazardous waste working group and also the work carried out by the EPA on Farm Hazardous Waste.</p> <p>The viability of collecting farm hazardous waste has been shown to be highly effective based on the outcomes of the EPA scheme over the period 2013 and 2018. As such, this policy action may be amended in the revised or replacement Plan to an action on implementation within the EPR regime. Also refer to Policy E7, which notes recommendations on the collection scheme for farm waste including the provision of permanent bring centres as well as a direct collection.</p> <p>As above, this EPR action is captured elsewhere and this action may be removed from the future plan in its current specific form with a more open requirement for pilot studies retained.</p> |
| H.2.2 Examine the possibility of expanding existing reuse schemes in place throughout the region. | The RWMPO work closely with reuse organisations such as CRNI members, the Rediscovery Centre, men's sheds, etc. A number of reuse material streams were examined for replication or expansion and research ideas and collaboration were explored. This action remains relevant for the revised or replacement Plan with the action aligned with the reuse streams and targets set in the European Union (Waste Directive) Regulations 2011-2020. |
| H.2.3 To transfer knowledge and skills on the successful schemes to all local authorities in all Regions. | The response to policy action D.2.3 identifies the approach taken to training and knowledge transfer within the RWMPO and the local authorities. Training needs are identified and applied as required to support the RWMP implementation. There is no specific reference to training on successful reuse schemes but it is considered that action D.2.3 could be suitably modified to accommodate action H.2.3 in the revised or replacement Plan. |
| H.3.1 Participate in working groups for setting up of new | Since 2016, the RWMPO have participated on a working group attended by the DECC, EPA, RWMPO, CRNI and social enterprise recycling organisations. The group commissioned a |

| Policy Actions | Evaluation |
|---|---|
| national producer responsibility schemes. | report and are working on the recommendations. Explorations regarding a EPR or PRI scheme are ongoing. The RWMPO should continue to participate in these working groups on producer responsibility schemes and this action remains relevant for the revised or replacement Plan and focussed on the requirements of Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020. |
| H.3.2 To ensure better segregation of hazardous waste and non-hazardous wastes at the point of collection from households and small businesses. | Since 2016, the RWMPO have been involved in Hazardous Waste Collection days in conjunction with the local authorities. These events offered citizens the opportunity to safely dispose of their hazardous wastes, including paint, medicines, fertilisers, pesticides, cleaning fluids etc. for free. The need for this policy action on household collection of hazardous waste should be superseded by any specific requirements implemented under Regulation 36 of the European Union (Waste Directive) Regulations 2011-2020. |

3.8.2 Policies

A short commentary on the policies of Strategic Objective H is presented in **Table 3.15** and these are informed by the policy action evaluations.

Table 3.15: Evaluation of Policies for Strategic Objective H

| Policy | Evaluation |
|---|---|
| H.1 Work with the relevant stakeholders and take measures to ensure systems and facilities are in place for the safe and sustainable management of sludges (sewage, water works, agricultural, industrial, and septic tank) generated in the region having due regard to environmental legislation and prevailing national guidance documents, particularly in relation to the EU Habitats and Birds Directive. | As the party responsible for the management of treatment sludges, Irish Water published the National Wastewater Sludge Management Plan in 2016. The current end-use outlet for wastewater sludge in Ireland is almost exclusively agriculture but the report finds that advanced anaerobic digestion is the most economically and environmentally sustainable option for this stream. While this plan was subject to public consultation, there was no formal engagement with the RWMPO and there is no recorded formal engagement since publication. There remains an urgent need for detailed engagement between Irish Water and the RWMPO on the waste management options and capacity for this waste stream in the event that the existing agriculture outlet is disrupted. In addition, the Irish Water network provides treatment capacity for septic tank cleaning services and there appears to be limited engagement between Irish Water and the RWMPO to identify any capacity issues for this treatment. There is the possibility of synergy between composting or biogas capacity for municipal waste and sewage sludges. This policy remains relevant with greater action and emphasis on engagement to ensure that all parties are consistent and agreed on treatment options and infrastructure in the revised or replacement Plan. |
| H.2 Investigate the opportunity to establish and expand management schemes for particular waste streams including (but not limited to) paints, medicines, mattresses, other bulky wastes, agricultural and horticultural chemicals and waste oils (where technically, environmentally, and economically practicable). | Throughout the plan period, the RWMPO have considered the management opportunities for a number of the listed waste streams both a solo project and through collaboration/reliance on other party projects. These streams include paints, hazardous farm waste, medicines and waste oils and while the actioned studies have not always been delivered, the data available has illustrated a number of recommendations for future management under the revised or replacement Plan such as through existing producer responsibility schemes (see below) or wider collection networks (such as farm hazardous waste – policy E7). Once these schemes are established and implemented under the revised or replacement Plan, a corresponding focus on transfer knowledge to local authorities and wider public awareness need to be retained within the policy. |
| H.3 Co-operate and input into the setting up of new national producer responsibility schemes (statutory or voluntary) for waste streams to ensure the role of local authorities is clear and can be practically achieved. | The RWMPO have had ongoing input and collaboration on the development and implementation of existing producer responsibility schemes to date. In addition, the RWMPO have had ongoing consideration of potential for waste streams that may be suited to the pending extended producer responsibility changes both under the Waste Action Plan for a Circular Economy 2020-2025 and Regulation 30/30A of the European Union (Waste Directive) Regulations 2011-2020. The RWMPO have a very clear vision for the waste streams that may be suited to EPR as listed in the Waste Action Plan for a Circular Economy 2020-2025. The improved governance and transparency within these schemes will allow the RWMPO to promote incentives and encourage sharing of information and good practices in waste recycling and drive better product design. This policy remains relevant and should be aligned with the evolving EPR policy and legislation. |

3.8.3 Strategic Objective H

The RWMPO have been somewhat successful in working with other groups to identify other waste streams outside of the performance targets that will require future attention under the revised or replacement Plan. The RWMPO have provided detailed consultation feedback to DECC on the draft Waste Action plan during consultation on the need for changes in policy for a range of other waste streams covered within the plan including construction waste, textiles, single use plastics, etc. These streams have been identified and are now include in the Waste Action Plan for a Circular Economy 2020-2025 for consideration as extended producer responsibility or other management schemes. To this end, the RWMPO have been proactive and successful in shaping policy to tackle the waste streams of relevance and those evolving priorities under EU legislation and policy.

The revised or replacement Plan is to consider the following in shaping future policies and actions resulting from the evaluation:

- The wording of the strategic objective remains relevant for the revised or replacement Plan;
- A more meaningful engagement with Irish Water on sludge waste treatment and end use is required to ensure that capacities, risks and opportunities of these streams are suitably transparent and managed;
- The Waste Action Plan for a Circular Economy 2020-2025 has signalled the potential consideration of additional waste streams within future Extended Producer Responsibility schemes and these schemes will be required to comply with the new requirements of Regulation 30A of the European Union (Waste Directive) Regulations 2011-2020. The establishment of any new EPR schemes needs to be fully collaborative and transparent and future policies and objectives in the revised or replacement Plan are to reflect the need for RWMPO input to such schemes; and
- Continue to investigate the viability of running pilot schemes for the management of emerging waste streams to capture data to inform suitable management models.

3.9 Strategic Targets

3.9.1 Strategic Target 1

1% reduction per annum in the quantity of household waste generated per capita over the period of the Plan.

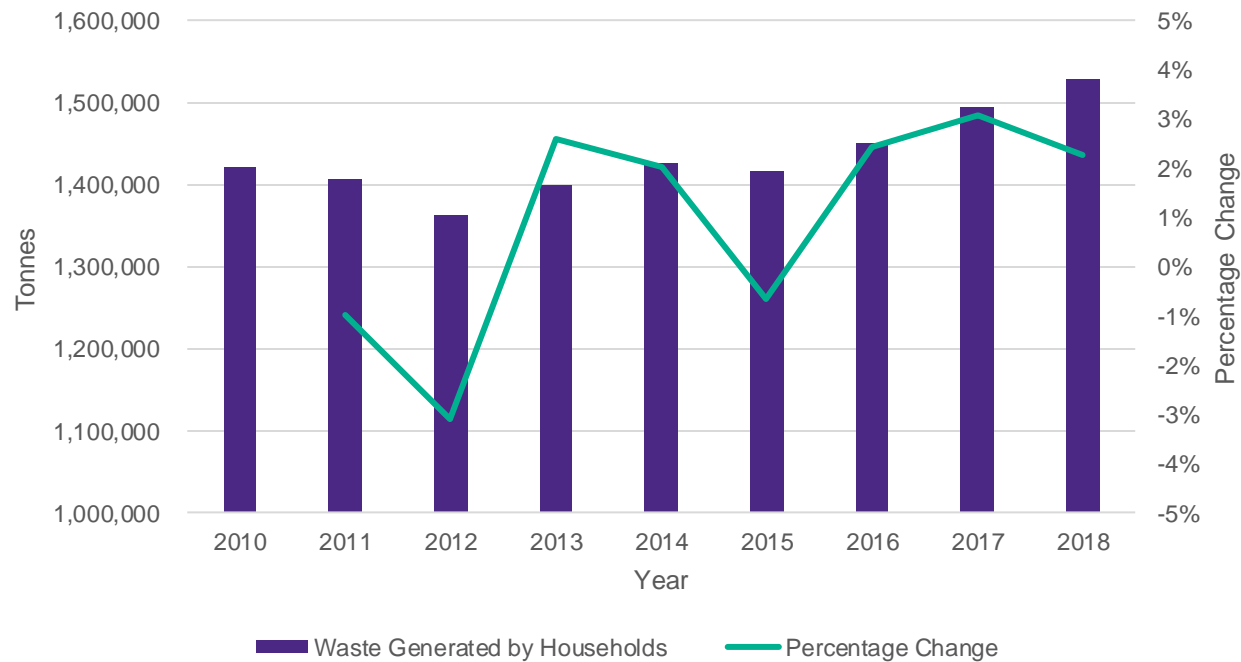
The waste statistics are provided by the EPA Waste Statistics for Households⁴ and **Table 3.16** provides the total tonnes of Irish household waste collected between 2010 and 2018 and the percentage change (increase or decrease) from the previous year. The EPA are yet to publish the 2019 and 2020 quantities of Irish household waste. The total tonnes and yearly percentage change is displayed in **Figure 3.2**.

⁴ <https://www.epa.ie/nationalwastestatistics/household/> - accessed May 2021.

Table 3.16: Municipal Waste Generated in Ireland

| Municipal Waste Generated by Origin | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------|------|
| Waste Generated by Households (Tonnes) | 1,420,706 | 1,406,576 | 1,362,900 | 1,398,156 | 1,426,123 | 1,416,444 | 1,450,727 | 1,495,211 | 1,528,890 | N/A | N/A |
| Reduction by 1% per Annum in HHW Generation | - | Yes | Yes | No | No | No | No | No | No | N/A | N/A |
| Percentage Change (%) | - | -0.99% | -3.11% | 2.59% | 2.00% | -0.68% | 2.42% | 3.07% | 2.25% | N/A | N/A |

Source: Environmental Protection Agency (EPA) Waste Statistics, Household - <https://www.epa.ie/nationalwastestatics/household/> - Accessed May 2021

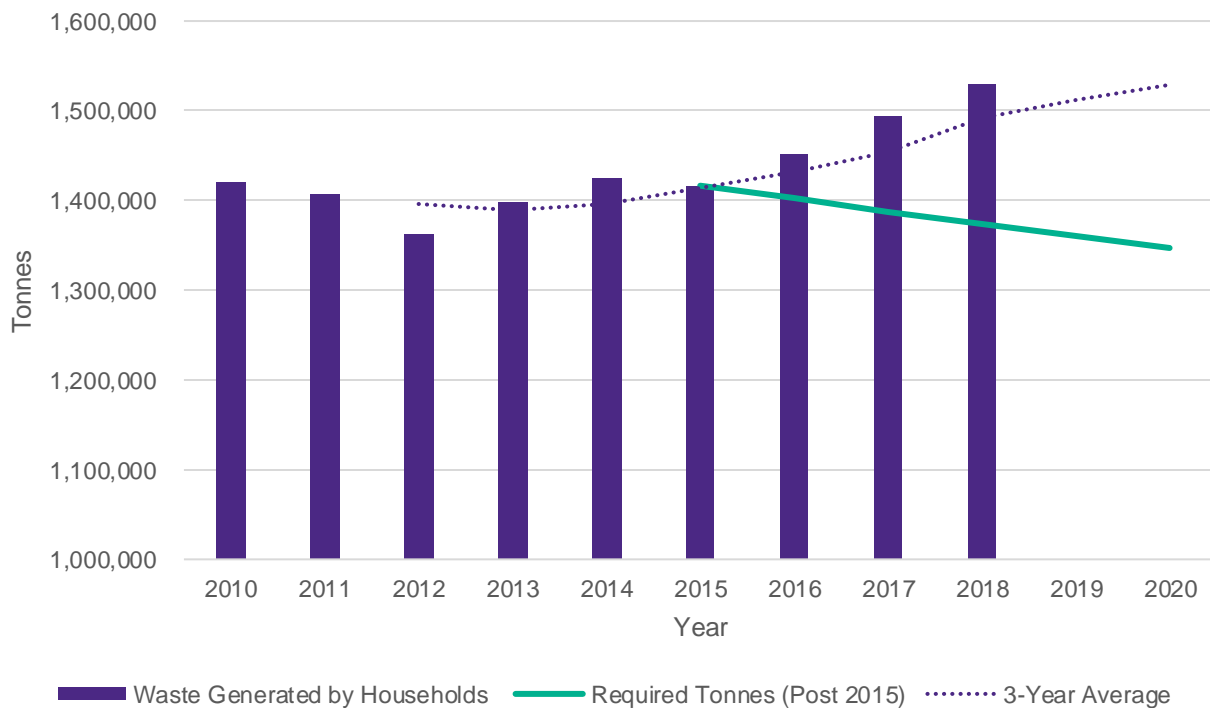


Source: Environmental Protection Agency (EPA) Waste Statistics, Household - <https://www.epa.ie/nationalwastestatics/household/> - Accessed May 2021

Figure 3.2: Municipal Waste Generated by Households in Ireland

Figure 3.2 shows that the total waste generated by Irish households has ranged between 1,362,900 tonnes and 1,528,890 tonnes between 2010 and 2018. The total tonnes decreased between 2010 and 2012, since 2012 the total tonnage has increased with the exception of a slight decrease in 2015. The highest quantity of waste was recorded in 2018, indicating that the quantity of household waste is currently increasing. The annual percentage change of the total quantity of household waste varies between -3.11% (2011-2012) and +3.07% (2016-2017).

The current regional Waste Management Plan Period (2015-2021) set a 1% reduction target per annum in the quantity of household waste. **Figure 3.3** displays the waste generated by Irish households and the predicted 2019 and 2020 quantities using a 3-year moving average between 2010 and 2018. The graph shows that for Ireland to meet the requirements of a 1% reduction per annum (between 2015 and 2020) Ireland would have to generate less than 1,360,630 tonnes in 2019 and less than 1,347,024 tonnes in 2020. The 3-year moving average of total waste anticipates that the total tonnes of waste will be approximately 1,510,000 in 2019 and 1,530,000 in 2020, values that are significantly above the 1% reduction required values.



Source: Environmental Protection Agency (EPA) Waste Statistics, Household - <https://www.epa.ie/nationalwastestatistics/household/> - Accessed May 2021

Figure 3.3: Waste Generated by Households and the 1% Reduction Requirement

Analysing EPA household waste statistics it can be concluded that Irish households have not met the required 1% reduction between 2016 and 2018 and is not anticipated reduction targets in 2019 and 2020 will be met given the 3-year trend.

The EPA statistics for 2018 show that the majority of waste collected from Irish households (per capita) is from mixed residual collection (black bin) followed by mixed dry recyclables (green bin) and organic collection (brown bin). Therefore, reduction of waste should focus on the black bin waste generated across Ireland. The increased black bin waste could be the result of improperly segregated household waste resulting in the cross-contamination of recyclables and inefficient waste management.

An EPA study found that the rising trend in household waste correlates with Central Statistics Office data on personal consumption of goods and services, both of which have shown an upward trend since 2012. The data indicate that household waste generation in Ireland continues to be closely linked with lifestyle and consumption patterns.

It is recognised that greater supports for householders are required to manage wastes at home, avail of waste civic amenity and bring centres and expand recycling infrastructure to facilitate the shift to greater recycling rates.

In summary, this Strategic Target is a measure of public awareness and real behaviour change among households. When this target was set in 2015 it was ambitious and the data shows that the State has not, and

will not, meet this target over the plan period. There remains a pressing need to decouple economic activity from waste generation in households. The realisation of this goal will take consistent investment for awareness strategies to effect real behaviour change. It is recommended that a future target on prevention recognises the limited control of the RWMPO in achieving this target. Any future target needs to be designed so it is readily (and reliably) measurable and will require the collective buy-in and sustained efforts of many stakeholders, public and private.

3.9.2 Strategic Target 2

Achieve a recycling rate of 50% of managed municipal waste by 2020.

Table 3.17 provides the percentage of recycling of municipal waste generated between 2012 and 2018. The waste statistics are provided by the EPA Waste Statistics for Municipal Waste⁵ (the Agency are yet to publish the 2019 and 2020 quantities of Irish municipal waste). These percentages are calculated using the EPA's preferred calculation approach based on the OECD-Eurostat sustainable development indicator on municipal waste.

Table 3.17: Percentage of Municipal Waste Recycled (2012-2020)

| Municipal Waste | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
|--|------|---------|------|---------|------|------|------|---------|---------|
| Recycling of Municipal Waste Generated (%) | 37 | No Data | 40 | No Data | 41 | 40 | 38 | No Data | No Data |

Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021

Figure 3.4 displays the data provided by the EPA municipal waste statistics and shows that the percentage of recycling of municipal waste generated in Ireland ranges between 37% and 41%. The graph shows that the percentage of recycling of municipal waste generated increased between 2012 and 2015 and has decreased between 2016 and 2018.

The Waste Framework Directive includes EU targets for the management of municipal waste. The targets are displayed in **Table 3.18** and state that 50% of municipal waste is prepared for re-use/recycled by 2020, this rises to 55% to be achieved by 2025, 60% to be achieved by 2030 and 65% to be achieved by 2035⁶.

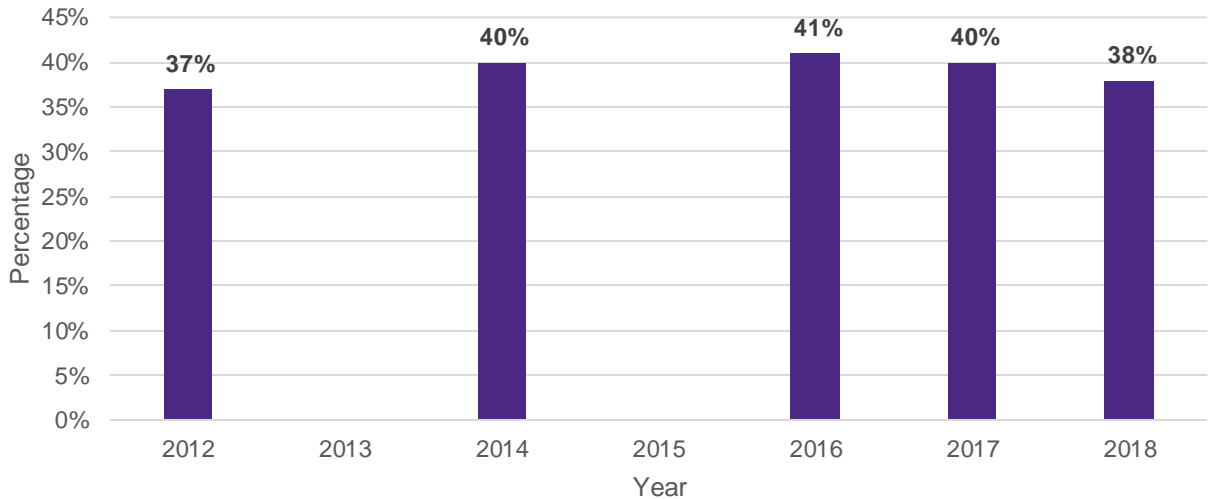
Table 3.18: Waste Framework Directive EU Targets 2020-2035

| Year | EU Target (%) |
|------|---------------|
| 2020 | 50 |
| 2025 | 55 |
| 2030 | 60 |
| 2035 | 65 |

Source: European Commission (2008). Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

⁵ <https://www.epa.ie/nationalwastestatistics/municipal/> - accessed May 2021.

⁶ European Commission (2008). Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

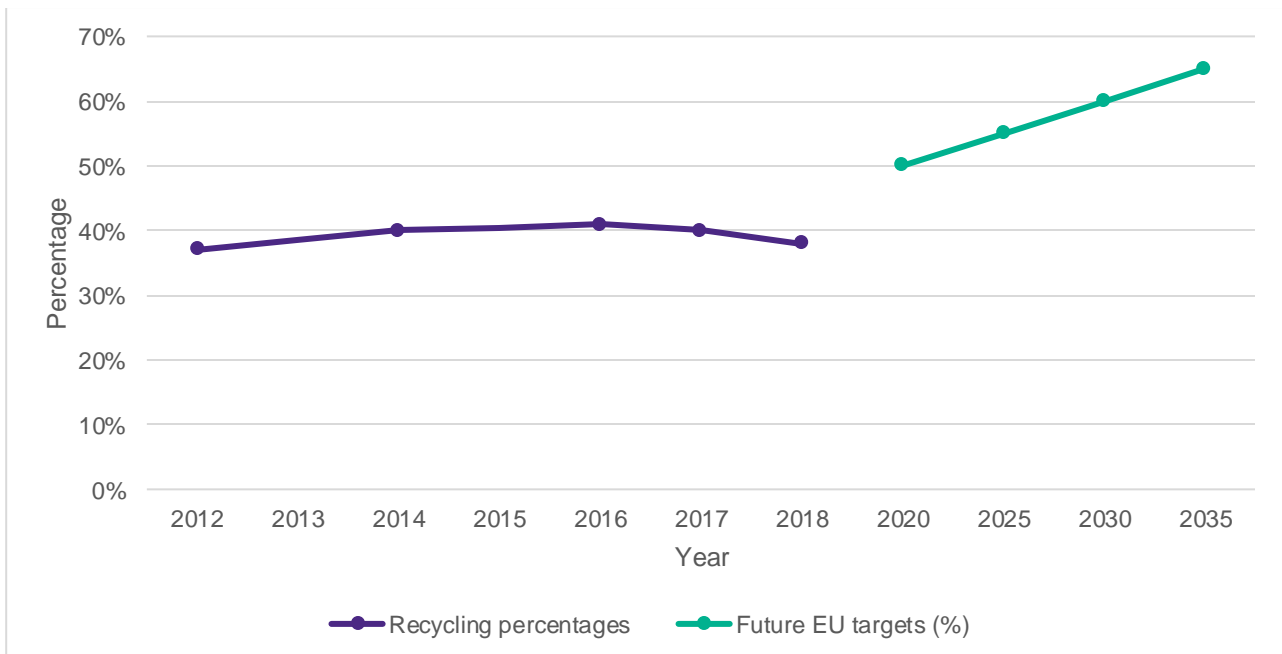


Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021

Figure 3.4: The Percentage of Municipal Waste Recycled (2012-2018)

Given the current trend of the recycling of municipal waste generated in Ireland, it is unlikely that the 50% EU target will be achieved in 2020. This puts Ireland’s achievement of future EU targets for 2025, 2030 and 2035 at risk without significant intervention and progress.

A separate calculation method has been used for reporting on the compliance with the Waste Framework Directive’s 2020 recycling target for municipal waste (based on household derived paper, metal, plastic and glass), as provided for under the Directive. This method calculates Ireland’s municipal recycling rate to be 51% in 2018, in compliance with the Directive’s 2020 target of 50%. However, future Waste Framework Directive targets for 2025 onwards will use a calculation methodology more comparable with the OECD-Eurostat Indicator. **Figure 3.5** shows that it is unlikely that Ireland will achieve the 2025 and thereafter EU targets using the OECD-Eurostat Indicator.



Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021

Figure 3.5: Recycling of Municipal Waste Generated and Future EU Targets

In summary, Ireland’s recycling percentage has not improved significantly between 2012 and 2018 and for Ireland the recommendations are to prevent waste (buy less, instead swap, share and repair) and increase recycling through education and awareness of waste management. Current trends in Ireland show that energy recovery of municipal waste is increasing as it continues to replace landfill as the primary means of treating

residual wastes. The current levels of residual waste need to reduce if recycling rates are to grow. Interventions required to support this change include prevention (through incentivised pricing), better kerbside segregation at households and business and the introduction of a recovery levy as proposed in the Waste Action Plan.

Strategic Target 2 is an EU mandated recycling rate target on recycling rates with a revised schedule of increasing targets over the medium term introduced by the revised Waste Framework Directive. These are principle mandatory targets and must be part of the revised or replacement Plan. The lack of meaningful progress in the recycling rate over the plan period and concerns over future targets needs to be a focus in the next plan.

3.9.3 Strategic Target 3

Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices.

Unprocessed residual municipal waste means residual municipal waste collected at kerbside or deposited at landfill/CAS/transfer stations that has not undergone appropriate treatment through physical, biological, chemical or thermal processes including sorting.

Currently, there are no EPA statistics available for unprocessed residual municipal waste to landfill but the EPA does provide figures for municipal waste recycled, used as fuel and disposed to landfill (tonnes) between 2001 and 2018 and this information is presented in **Figure 3.6**.



Source: Environmental Protection Agency (EPA) Waste Statistics, Municipal - <https://www.epa.ie/nationalwastestatistics/municipal/> - Accessed May 2021

Figure 3.6: Municipal Waste Recycled, Used as Fuel and Disposed to Landfill (2001 - 2018)

The figure shows that the generation of municipal waste increased between 2001 and 2007 prior to a period where municipal waste generation decreased between 2007 and 2012. Since 2012, total municipal waste managed has continued to increase until the most recent figures in 2018. From the available EPA published data the current trend shows that municipal waste being sent to landfill is generally decreasing with 418,029 tonnes of municipal waste sent to landfill in 2018 (circa 15% of waste generated).

The RWMPO has previously undertaken a National Review of Civic Amenity Sites (CAS). The review included an assessment of handling of unprocessed residual waste at CAS. Unprocessed residual waste was reported as going directly from the CAS to landfill at two CAS. Unprocessed residual waste is reported as going directly from site to incineration at five CAS. The review can therefore conclude that the target of 0% of unprocessed residual municipal waste being sent to landfill is not currently being achieved.

As noted earlier in this report, it is recommended that the EPA impose a licence condition on all landfills licensed to accept municipal waste that prohibits the acceptance of unprocessed waste at these facilities. An extension approach to include waste to energy facilities to improve the management of residual wastes should be considered.

In summary, Strategic Target 3 cannot be accurately evaluated as there is limited data available to robustly quantify the volume of unprocessed waste to landfill. The quantity of unprocessed waste being sent to landfills is considered to be small, set against a decreasing rate of residual waste disposal. There is a need for better collation of this data to verify this trend. It is recommended that the EPA impose a licence condition on all landfills licensed to accept municipal waste that prohibits the acceptance of unprocessed waste at these facilities. Such an intervention will eliminate disposal of this stream. There appears to be limited value including this type of target in the next plan with alternative targets to improve the management of other waste streams (textiles, construction and demolition wastes, food waste, plastics etc) more pressing.

4 CONCLUSIONS

Notwithstanding the recommendations stated for each of the objectives and targets presented in **Section 3** of this report, there are a number of broader key themes identified in the evaluation for consideration for future waste management planning. These key themes may be summarised as follows:

- The need for a revised or replacement Plan;
- The structure of the revised or replacement Plan;
- The need for a dynamic Plan that has capacity to prioritise through the timeframe of the Plan; and
- The need for shared ownership.

Each of the above is set out in the following sections for consideration.

4.1 Revise or Replace

The decision to revise or replace the current waste plans takes on board the findings of this evaluation, evolving policy and the latest legislative requirements. During the plan period significant changes to waste policy and legislation have occurred at a national and international level. At European level the Green Deal was introduced in 2019 setting headline goals for Member States to achieve carbon neutrality by 2050 and to halt biodiversity loss. The waste sector has a role to play in achieving these objectives. A 2nd Circular Economy Action Plan was introduced in 2020 which builds on previous policy with a focus on improving the management of specific streams (including targets) for textiles, food waste, construction and demolition wastes and plastics.

A revised Waste Framework Directive (2018/851) introduced in 2018 has strengthened and improved the parent framework for managing wastes. Ireland has responded transposing Directive (EU) into Irish legislation through the European Union (Waste Directive) Regulations 2020 (S.I. No. 323 of 2020). This new legislation includes significant changes such as

- Enhanced requirements and mechanisms for the prevention of waste;
- New targets for municipal and construction and demolition wastes; and
- A redefined set of requirements for Waste Management Plans under Section 22 of the Act, as amended (these requirements are included in **Appendix A** and the replacement plan must be developed in accordance with these).

The policy and legislative environment has changed significantly over the lifetime of the current plans. To realise the new targets and requirements, it is recommended that the RWMPs are replaced with a single national waste management plan. The single plan will aim to build on the progress from 2015, strengthen national capacity and delivery while retaining a regional focus for implementation. This approach aligns with Ireland's policy statement, the Waste Action Plan for a Circular Economy, which includes a recommendation for the revision of the existing three regional plans into a national plan approach.

4.2 Structure of the Plan

While the defined requirements of the new plan (as presented in **Appendix A**) are prescriptive, the replacement plan structure needs to provide an adaptable clear framework for delivery. At the Irish Waste Management Association Annual Conference in November 2019 the RWMPO gave a presentation which looked at setting out an alternative thematic approach to the plan promoting the following themes:

- Consumption of materials and generation of waste;
- Compliance with relevant waste management laws and policies;
- Capture of waste materials for treatment; and
- Circularity to tie each of the above together.

Such a thematic approach would be a departure from the current target and objective-led structure in the existing RWMPs, however, this approach will help to set more meaningful and thematic led targets to drive the improvements needed.

In short, there will need to be flexibility in the structure of the replacement plan to allow for a more progressive approach to be implemented while recognising that legislative requirements need to be addressed in the content.

Also in relation to structure, the current plans set out a layered structure consisting of objectives, policies, policy actions and targets as follows:

- 3 headline strategic targets covering prevention, recycling and landfilling and these are common to the three plans;
- 8 strategic objectives which set out the region's statement of intent for each of the plans which are also common to the three plans;
- 43 policies to achieve the overarching strategy and targets of the plans which are common across the three plans; and
- 63 policy actions implementing policies listed with only minor differences between the three plans.

This evaluation report illustrates that while this multi-layered approach provides advantages in terms of management and planning, the policy action structure was too rigid and inflexible. Consideration should be given in the replacement plan to a similar plan implementation structure with fewer policy tiers. For example, an alternative structure may include higher level themed targets supported by a specific objectives. The delivery of these objectives may fall to annual implementation plans to maintain a dynamic responsive nature to the replacement plan (refer **Section 4.3**).

4.3 A Dynamic Plan

Over the lifetime of the current plans there have been a number of policy and legislative changes that have shifted the waste policy and legislative requirements. Key changes include:

- The Circular Economy Action Plan (COM (2015) 614) which has been updated in March 2020 (COM (2020) 98) as part of the European Green Deal;
- '*A Waste Action Plan for A Circular Economy – Ireland's National Waste Policy 2020 – 2025*';
- '*All of Government Circular Economy Strategy*' to be published in 2021;
- The general shift away from disposal to recovery within the market; and
- The enhanced roles of the WERLAs and NWCPD under the Waste Action Plan.

When coupled with other significant external challenges such as the 2016 municipal residual waste capacity deficit or the 2020/2021 COVID-19 response, the waste sector may be viewed as a constantly changing and fluid system with evolving and dynamic priorities.

In this regard, it is important the replacement plan is sufficiently flexible to allow for a dynamic response to evolving issues over the lifetime of the plan. These evolving issues may include thematic or sectoral prioritisation, market drivers for collection, treatment capacity and/or emergency responses to unforeseen events.

The current model of setting priority actions that apply for the six year plan period proved to be effective for progressing many policies, but was also overly rigid. It is proposed to replace this structure with annual or biennial quantifiable actions developed as part of annual implementation plans. Such an approach in the replacement plan will lead to a more dynamic implementation model allowing the RWMPO to respond to issues as these arise over the plan period.

4.4 A Shared Ownership Model

This evaluation has illustrated two largely conflicting outcomes which are considered further below:

- The RWMPO have achieved a high level of success in implementing the various policies and policy actions prescribed within the three existing plans. While not all actions were achieved there is generally a high level of delivery. This includes establishing and building strong stakeholder collaboration within the industry, coordinating and tracking waste data and capacities.

- Conversely, this high level of RWMPO performance has not translated into target success and the attainment of the three strategic targets has been poor over the plan period. As noted, these targets were highly ambitious when set in 2015 but the absence of any meaningful progress on the targets over the plan period is a concern.

This contradiction does illustrate one of the key issues for consideration in the replacement plan, i.e. the need for a shared ownership of the plan and targets. While the RWMPO are tasked with providing the structure and framework for delivery of the targets, the local authority network is not solely responsible for the achievement of these targets. Furthermore, the RWMPO does not have the authority to control all operations in the waste sector to drive the changes to achieve these targets.

The changes required can only be achieved through a wider shared collaboration and ownership of the replacement plan and associated targets and policies. This collaboration requires active participation from all stakeholders in a highly functioning waste collection, processing, recovery and disposal market.

The RWMPO will continue as the coordinating force under the replacement plan but with a shared vision for the sector where all of the key actors have ownership of the plan.



Appendix A
Revised Content for Waste
Management Plans

Amendments to Section 22 of the Act of 1996 (Waste Management Plans) as prescribed in the European Communities (Waste Directive) Regulations 2020 (S.I. No. 323 of 2020)

9. (1) Subsection (6)(b) is replaced as follows:

'(b) A waste management plan shall contain, as appropriate, and taking into account the geographical level and coverage of the planning area, at least the following:

- (i) (I) the type, quantity and source of waste generated within the territory, the waste likely to be shipped from or to the national territory, and an evaluation of the development of waste streams in the future; and*
(II) a requirement that, in order to fulfil this obligation, liaison shall be undertaken, as appropriate, with the Minister, the Agency, Dublin City Council and other relevant local authorities;
- (ii) existing major disposal and recovery installations, including any special arrangements for waste oils, hazardous waste, waste containing significant amounts of critical raw materials, or waste streams addressed by specific Union legislation;*
- (iii) an assessment of the need for closure of existing waste installations, and for additional waste installation infrastructure in accordance with section 37A. The Minister shall ensure that an assessment of the investments and other financial means, including for local authorities, required to meet those needs is carried out. This assessment shall be included in the relevant waste management plans or in other strategic documents covering the entire territory of the State;*
- (iv) information on the measures to attain the objective laid down in Article 5(3a) of Directive 1999/31/EC or in other strategic documents covering the entire territory of the Member State concerned;*
- (v) an assessment of existing waste collection schemes, including the material and territorial coverage of separate collection and measures to improve its operation, of any derogations granted in accordance with Article 10(3) of the Waste Directive, and of the need for new collection schemes;*
- (vi) sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations, if necessary;*
- (vii) general waste management policies, including planned waste management technologies and methods, or policies for waste posing specific management problems;*
- (viii) measures to combat and prevent all forms of littering and to clean up all types of litter;*
- (ix) appropriate qualitative or quantitative indicators and targets, including on the quantity of generated waste and its treatment and on municipal waste that is disposed of or subject to energy recovery.*
- (x) information as respects the integration and implementation of measures consequential on, or incidental to, the requirements of section 27A in relation to waste prevention programmes;*
- (xi) the measures taken by the Minister to give effect to Article 22 of the Waste Directive in relation to biowaste.'*

(2) Subsection (6)(d) is replaced as follows:

'(d) Waste management plans shall conform to the waste planning requirements laid down in Article 14 of European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste, and the strategy for the implementation of the reduction of biodegradable waste going to landfills, referred to in Article 5 of Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste as well as national legislation and policy on biodegradable waste.'



Appendix B
Legislative Review

B.1 EU Legislation

There have been a number of additional legislative changes in the waste sector driven by EU policy since publication of the plans in 2015 and some of the headline changes in waste legislation are listed as follows:

- Directive (EU) 2018/849 of 30 May 2018 amending Directives 2000/53/EC on end-of-life vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on waste electrical and electronic equipment;
- Directive (EU) 2018/850 of the European Parliament and of the Council of 30 May 2018 amending Directive 1999/31/EC on the landfill of waste;
- Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018 amending Directive 94/62/EC on packaging and packaging waste; and
- Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

B.2 National Legislation

Similarly, there have been a number of changes to national legislation with potential to refocus the plans and policy actions including:

- The Waste Management (Collection Permit) (Amendment) Regulations 2016 (S.I. No. 24 of 2016);
- European Union (Waste Directive) (Amendment) Regulations 2016 (S.I. No. 315/2016);
- Waste Management (Collection Permit) (Amendment)(No.2) Regulations 2016 (S.I. No. 346/2016);
- European Union (Waste Directive) (Recovery Operations) Regulations 2016 (S.I. No. 372/2016);
- Waste Management (Fixed Payment Notice) (Producer Responsibility) Regulations 2016 (S.I. No. 373/2016).
- European Communities (Port Reception Facilities for Ship Generated Waste and Cargo Residues) (Amendment) Regulations 2016 (S.I. No. 550/2016).
- The European Union (End of Life Vehicles) (Amendment) Regulations 2016 (S.I. No. 566 of 2016);
- The Waste Management (Farm Plastics) (Amendment) Regulations 2017 (S.I. No. 396 of 2017);
- The Waste Management (Tyres and Waste Tyres) Regulations 2017 (S.I. No. 400 of 2017);
- Waste Management (Tyres and Waste Tyres) (Amendment) Regulations 2017 (S.I. No. 598/2017);
- Waste Management (Prohibition of Waste Disposal by Burning) (Amendment) Regulations 2017 (S.I. No. 599/2017);
- Waste Management (Tyres and Waste Tyres) (Amendment) Regulations 2018 (S.I. No. 96/2018);
- European Union (Properties of Waste which Render it Hazardous) Regulations 2018 (S.I. No. 383/2018);
- European Union (Ship Recycling) (Waste) Regulations 2019 (S.I. No. 13/2019);
- Waste Management (Landfill Levy) (Amendment) Regulations 2019 (S.I. No. 182/2019);
- European Union (Waste Electrical and Electronic Equipment) (Amendment) Regulations 2019 (S.I. No. 233/2019);
- Waste Management (Facility Permit And Registration) (Amendment) Regulations 2019, (S.I. No. 250/2019);
- European Union (Waste Licensing) (Amendment) Regulations 2019 (S.I. No. 618/2019);
- Waste Management (Prohibition of Waste Disposal by Burning) (Amendment) Regulations 2019 (S.I. No. 684/2019);
- European Union (Waste Management (Environmental Impact Assessment) Regulations 2020 (S.I. 130 of 2020).

B.3 BAT Conclusions

Under the exchange of information carried out in the framework of Article 13(1) of the Industrial Emissions Directive (IED, 2010/75/EU) the EU has published two relevant BAT Conclusion documents that are now mandatory for implementation for IE licenced was facilities as follows:

- Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council.
- Commission Implementing Decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for waste incineration.