**Environment Water and Climate Change SPC**

**Meeting 1 May 2018**

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| **Update on EM Regional Waste Management Plan** |

**Current position – Summary**

* Following a review of the regional structures for waste management planning in Ireland in 2012 the Dept of Environment, Heritage and Local Government at the time introduced changes to those regional structures reducing the 10 waste regions as existed previously to 3 currently – the Southern Region, the Connaght Ulster region and the Eastern Midlands region (which includes the Dublin LAs).
* The Eastern Midlands Region Waste Management Plan for the period 2015 to 2021 was adopted in 2015 by all 12 member counties of the Eastern Midlands Waste Region (Dublin City Council, Dun Laoghaire Rathdown, Fingal, South Dublin, Louth, Kildare, Laois, Longford, Offaly, Meath, Wicklow and Westmeath County Councils).
* A regional office has been established by each of the 3 waste regions to co-ordinate the approach to waste management planning across much larger regions which exist now under the new regional structures. The Eastern Midlands Regional Waste Office (EMRWO) is based in Dublin City Council and has 4 staff which includes the role of a regional coordinator.
* A similar approach has been taken to the specific area of waste licensing and enforcement within each waste region with a nominated authority acting as the Waste Enforcement Regional Lead Authority (WERLA) and in the Eastern Midlands region the WERLA is also run by Dublin City Council.
* The WMP 2015 to 2021 contains three overarching targets as well as a large number of policy statements and policy actions to be taken in the implementation of the plan. The overarching waste targets are as follows :
  1. A 1% reduction per annum in the quantity of household waste generated per capita over the period of the plan,
  2. Achieve a recycling rate of 50% of managed municipal waste by 2020, and
  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.

Current status in relation to these 3 targets is as follows –

* 1. The most recent available waste statistics (2014) show that waste generated per household was still increasing at that time.
  2. The most recent available statistics show the recycling rate for managed municipal waste at 42% for the Eastern Midlands Region.
  3. As the most recent waste report available is for 2014 and this indicator is to be measured from 2016 onwards, it is not possible to assess the current position.
* The WMP includes a requirement for annual reporting on activity over the previous 12 months with regard to implementation of the plan and the achievement of it’s targets and objectives. The most recent WMP annual report available was produced for the 2015/2016 period and was based on the 2014 Annual Waste Report data produced by the EPA. Completion of the annual WMP report for 2016/2017 is awaited, pending the publication of the most recent validated waste statistics by the EPA, and it is expected that the WMP report therefore will be available in June. A further presentation can be made to the SPC once that report is available.
* A summary of the validated 2014 waste data is as follows –

1. Total household waste managed in the EM regions was 722,544 tonnes
2. Total household waste managed and directed to recycling/recovery 72% of the above
3. Total household waste managed and disposed 28% of total
4. Households with an integrated waste collection service 84% of total
5. Households availing of a 3 bin service 45%
6. Household WEEE recovered per person in the region 6.05kg
7. Total household waste managed per household 914kg
8. Total household waste managed per person 0.327kg
9. Civic amenity sites in the region 31
10. Quantity of waste accepted at these 20,569 tonnes
11. Bring bank sites in the region 597
12. Quantity deposited at these 36,147 tonnes.

**Current issues**

The following is an overview of current issues being considered/progressed within the Eastern Midlands region at the present time, some of these are national issues and some local:

**Waste collection charges**

* In June 2017 the government announced an end of flat rate charging for kerbside waste collection, with flat charges due to be phased out over a 12 month period from Autumn 2017 to Autumn 2018.
* The date of October 2018 was set as the date for completion of the transition from flat charging to pricing plans.
* The new charge is to be based on a per weight or per lift charge and is to include a weight allowance. Some service providers also charge a standing or service charge.
* It is at the discretion of the service provider whether they will charge separately for the green or brown bins (dry recyclables and organic waste bins) or if they wish to bundle these charges.
* The majority of households nationally will not be affected by this change from flat charging as they are already on payment plans of this nature.
* Government have established a pricing watchdog to monitor the situation regarding waste charging.
* The previous plan, in 2016, to introduce a mandatory pay by weight system nationally has been scrapped.
* It was also intended to introduce pay by weight at civic amenity sites, to create a level playing field in waste charging, and this has been put on hold for now.
* It was also intended to introduce a national database for the compilation of information regarding the use of all kerbside collection services and CA services and this has also been put on hold for now.

**Waste treatment and disposal capacity**:

The options for treatment of residual MSW in 2018 are as follows:

Landfill available for Municipal Waste 378,000 tonnes

WTE in Ireland 811,000 tonnes

Export to WTE (Secured) 260,000 tonnes

SRF to Cement Kilns 220,000 tonnes

Total expected capacity 1,669,000 tonnes

The projected generation of Residual MSW for 2018 is as follows:

Projected **Total** Municipal Waste Generation 3,130,000 tonnes

Projected Municipal Waste **Recycling** Rate 46%

Projected Municipal Waste **Recycling** tonnage 1,439,800 tonnes

**Residua**l MSW after recycling 1,690,200 tonnes

This suggests that there will be a deficit in capacity of over 20,000 tonnes.

**Historic Landfills:**

*EM Waste Management Plan objective G2.2 - Each Region is to develop and agree a road map prioritising for investigation and remediation the ranked landfills (taking into account the scale of the risks and impacts on the environment).*

Work on investigation of these sites progressed during 2017, two of these sites were in the SDCC functional area, and funding was provided by DCCAE for these investigations. Current legislation requires that these sites are progressed through site investigation and environmental risk assessment, application to the EPA for a certificate of authorisation for each site and remediation of the site if required . There has been a delay in processing of Certificate of Authorisation (CoA) applications by the EPA as a result of which no certs have been issued by them in recent times. This bottleneck needs to be overcome if progress is to be made on remediating the historical landfills.

**C&D Waste:**

* Additional licence applications granted by EPA have ensured sufficient capacity for clean soil and stone (inert)
* Article 27 notifications may have diverted material away from licensed facilities (1.5 million tonnes approx)
* EPA have issued guidance manual for Article 27 notifications, see summary below
* Difficulties accessing disposal capacity for fines and non haz-non inert soils (ideally a dedicated lined landfill is required for this)

**Article 27 EPA Guidance**

**EPA November 2017 Guidance on Article 27 Notifications for Soil & Stone: Pertinent Points**

The guidance document sets out the EPA’s current position, in light of a significant number of notifications to the EPA in recent times, and offers advice and guidance to stakeholders.

* Notifiers should wait for the EPA to declare their position; a determination would result in already moved material having to be dealt with as a waste in accordance with waste legislation.
* Only the producer of the waste can make a notification, not hauliers.
* Precautionary Principle is central: acceptable sites must have planning permission as well as a complete and specific environmental assessment in place.
* EPA has taken the position that quarries, or similar voids, will not be considered as destinations for notified soil & stone at all, even if planning permission plus complete and specific environmental assessment is in place. Position is that such activity requires the scrutiny and control of a waste authorisation. However, this is subject to consultation and may not prove possible to implement in all cases.
* Timing is very important; ideally producers should not start producing the by-product until the EPA have declared their position. Producers should act early and prepare an Article 27 notification during the preliminary stages of a project.
* The scope of an acceptable Article 27 notification is narrow and producers ought to consider the alternatives (such as waste authorised end destinations) which may prove more beneficial and cost effective ultimately.
* Material must be clean, green field soil & stone and importantly, also free from invasive species.
* Acceptable for notified material to go to an authorised waste facility, but the tonnages would be counted within the facilities authorised limits (pointless to go to the bother of notifying).

**Waste Presentation Bye-Laws Template**

* Work has been carried out to prepare a waste presentation bye laws template which can be used across all 3 waste regions, along with a guidance document and FAQ sheet.
* These documents have now been examined and approved by legal counsel.
* Agreement has been reached that each local authority will now proceed to carry out the statutory processes to adopt these and this includes public consultation.

**Waste Management Facility Siting Criteria:**

*EM Waste Management Plan objective G.3.1* *- Prepare Siting Guidelines for waste facilities and review general environmental protection criteria as set down in the waste plan.*

Detailed discussions were had with DCCAE as well as DHPLG on the matter of criteria for the siting of waste management facilities which would be agreed and adopted nationally and implemented in a consistent and uniform manner across all 3 waste regions. The main issues addressed in the siting guidelines are as follows -

1. Guideline Setback Distances Between Principal Processing Area of the Facility and residential areas,
2. Guideline Setback Distances Between Principal Processing Area of the Facility and Business/Industry, and
3. Guideline Distance from National Road Network.

Consultation across the regions has been carried out and the siting criteria document is in the process of being finalised. The options for adopting and implementing the siting guidelines have been considered, the preferred option is by way of a joint circular from DCCAE and DHPLG. Target date for implementing the guidelines was Q1 2018.

**Regional Enforcement (WERLA)**

2017 was the WERLAs first full year of operations, established in early 2016. Good relationships with the waste enforcement officers in the region have been developed.

* Household Brown Bin: the roll out of the brown bin was a focus, with use of the Food Waste Regs to issue notices to non-compliant collectors. Mr White thanked the local authority enforcement officers for pushing this.
* Tyres: The new tyre regulations came into force on 1st October. The WERLAs alongside Repak ELT participated in five national roadshows with the industry to highlight retailer/producer obligations. The industry is saying that enforcement is critical. The WERLAs focus has been mainly on the major tyre operators where the biggest impact can be made. Enforcement will continue in 2018.
* ADI: there will be one tranche next year. In 2018, it will be the same initiative as before, despite requests from the LAs for changes, exception being the one tranche instead of two. In response to a question from Martin Murray on unused grants Mr White will request LA’s to ensure that they will spend allocated funds as by end of year end, they cannot be re-allocated.
* C&D / Article 27: A meeting was held by the WERLA with reps from the Operations Group to make a submission to the EPA on their draft policy; however the date for submissions had passed. EMWERLA will now meet with other two WERLA’s to make a joint submission on behalf of LA’s to the DCCAE. Waste enforcement cannot deal with this on its own and there is a need for Planning Authorities to be more involved at an earlier stage in the planning process. The WERLA’s will be developing guidance in early 2018 to ensure a standardised approach surrounding C&D Waste Plans and their enforcement. C&D waste movement needs to address at places of origin and destination and LA’s need to work together on this.
* Multi-agency operations: it’s recognised that waste crime is a lucrative business and not enough impact is being made yet to tackle it. It needs more local intelligence. It is being taken very seriously by government and internationally, Interpol. Structures have been put in place and this work will continue in 2018.
* Genval Review: Ireland was assessed by the European Commission with respect to the State’s performance in dealing with environmental crime - Dept Justice, NTFSO, EPA and LAs; more to come in March/April. The Commission was impressed with a lot of what they saw, but expect they will point out where we can do better, illustrate how some things are done better in other countries.
* National Enforcement Priorities for 2018: These have already been included in the RMCEI work plans of local authorities for 2018. They are:
  + *Illegal dumping including C&D waste*: will look at C&D waste plans and develop standardised approach including inspections at origin and destination sites.
  + *Household and commercial waste management compliance*
  + *Waste tyres*: will give good focus to this in Q1, to build momentum and get producers to register with Repak and get on board with the scheme.
  + *Unauthorised sites of concern which require a multi-agency response*: for example the Ferry’s site in Donegal. The WERLA is assisting the local authorities with these. There is precedent there now for how to deal with these sites. Mr White advised that it is best to deal with these sites early on and encouraged the local authorities to advise the WERLA of any sites that they may become aware of as soon as possible.

**2018 EMRWO Work Programme**

## Plan Implementation

### POLICY & LEGISLATION

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| --- | --- | --- | --- |
| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter4** |
|  | Collate & analyse 2015/16 Waste Data for all waste streams | |  |
|  | Conduct in depth validations of AER Returns of major collectors |  |  |
|  | Publish Annual Report 2017 |  |  |
| Co-Ordinate Bye-Law Adoption process in each Local Authority | | | |

### Prevention

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| --- | --- | --- | --- |
| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** |
| Develop & rollout National Waste Campaigns in conjunction with other Regions | | | |
| Complete Bring Bank Rebranding Programme | | | |
|  | Develop & rollout Household Hazardous Waste Campaigns | | |
| Co-Ordinate Regional Reuse Month/EWWR/Conscious Cup in conjunction with other Regions | | | |
| Further develop programme with Local Authorities to reduce LA HQ waste by 10% | | | |

### **RESOURCE EFFICIENCY & CIRCULAR ECONOMY**

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| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** |
| Co-ordinate/ rollout of the EcoMerit Programme | | | |
| Prepare/ disseminate a guidance note for reuse & preparation for reuse activities | | | |
| Develop Resource Efficiency Pack for SME | | |  |
| Manage Partnerships with SMILE & Rediscovery Centre | | | |

### CO-ORDINATION

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| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** |
| Attend/Participate at all relevant National Group Meetings | | | |
| Co-Ordinate Regional Steering Groups (Directors of Services, EAO & Operational). | | | |
| Maintain & Manage Regional Office( Staffing, Budget etc) | | | |
| Deliver agreed priority training courses | | | |
| Explore partnership opportunities for European & National Funding calls | | | |

### INFRASTRUCTURE PLANNING

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| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** |
| Brief LA Planning Departments |  |  |  |
| Monitor ongoing capacity for MSW/C & D | | | |
| Advance all recommendations in National Capacity Report for MSW | | | |
| Co-Ordinate preparation of National Report on Civic Amenity Sites | | |  |
| Pursue contingency supply of MSW capacity for the State | | | |
| Undertake site visits for information purposes | | | |
| Meet/Consult with EPA, ABP & DCCAE & other stakeholders as appropriate | | | |
| Co-ordinate the standardisation of facility authorisations | | | |
|  |  | Conduct Infrastructural Capacity analysis for Annual Waste Report |  |

### **PROTECTION**

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| Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 |
| Advance Roadmap for Historic Landfills/Illegal Sites remediation with EPA/DCCAE | | | |
| Assist NWCPO with creation & maintenance of new historic landfill database | | | |
| Finalise & publish siting criteria for waste facilities | |  |  |
| Undertake research programme to address areas of low collection coverage | | | |
|  |  | Review operation of AA Screening Template; arrange further training |  |

### **OTHER WASTE STREAMS**

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| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** | |
| Investigate / Prepare for rollout of National Schemes for paint/mattresses | | | | |
|  | Prepare & disseminate information re hazardous waste for LA websites |  | |  |
| Attend working group/network events for Producer Responsibility Schemes | | | | |

### ENFORCEMENT

* Work plan developed by WERLA in accordance with National Waste Priorities & policy actions outlined in Regional Waste Plan.

## PUBLICATIONs & COMMUNICATIONS

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| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** |
| Developing communications strategy | |  |  |
| Manage preparation & storage of communications | | | |
| Website & Social Media management | | | |
| Co-ordinate & prepare submissions | | | |
| Quarterly Newsletter/Weekly tweet campaign | | | |

## STAKEHOLDER MANAGEMENT

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| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** |
|  | Develop Stakeholder Register |  |  |
| Attend Working Groups & Taskforces | | | |

## OFFICE & TEAM MANAGEMENT

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| **Quarter 1** | **Quarter 2** | **Quarter 3** | **Quarter 4** |
| Monitor & update work plan | | | |
| Develop & implement further SOPs | | | |
| Reports/Publications for Steering/Operational Groups | | | |