

1. Please provide some information about your organisation:

o Name, address, contact details.

Chartered Institution of Wastes management
7-9 St Peter's Gardens
Marefair
Northampton
NN1 1SX
01604 620426

RoI Contact – Secretary – Colin Ryder, corkplynch@gmail.com, +353 9096 86023

o Is your organisation a member of Repak?7

No

o In which sector does your organisation operate? And in what role does your organisation operate within that sector?

The Chartered Institution of Wastes Management (CIWM) is the leading professional body for resource and waste professionals, CIWM is the voice of the sector and represents over 5,500 individuals and organisations in Ireland, the UK and overseas.

2. How can the outlined approach proposed in this document deliver on the objectives stated in the introduction section?

The two phase strategic plan looks fine and reads well but it is very generic in nature, and there is no detail, so limited comments can be made. There is no information at all on Phase 2.

The big unknown that is the financial aspect. With regard to the four main stakeholder groups, the CIWM would see Producers and Waste Collection/recycling sector as the two most critical to such a strategy being a success. Public authorities will develop Strategy and a regulatory Framework but unless everything stacks up financially for economic operators ie Producers and Waste Collection/recycling sector there is no reason why they would change current their practices to achieve the overall goal. It must make sustainable and business sense.

We have seen in recent years with the addition of Biodegradable Municipal Waste (BMW) limits at landfills how if something does not make commercial sense for the waste processors it does not happen. (BMW limits were never met at any landfill as the changes to processing were not implemented). Ireland inc. complied by default only because the boom ended and the amount of waste arising fell naturally.

To summarise, the strategy will need financial modelling that can be tested and interrogated to ensure that it is robust and the assumptions that it is based upon are sound. Without these, it cannot be supported.

3. What additional measures, if any, are required? Please describe.

The sector is in a state of flux at the moment, the like of which we haven't seen in decades. As such the strategy needs to be robust, yet adaptable to take advantage of technical advances that we are likely to see in the next few years or even decades. For example, some large retailers and Viridor and Faerch Plast have changed the fate of "black plastic trays" in the last six months from "cannot be recycled" to "Can be" and the incorporation of post consumer recycle into PE bottles will be visible to the consumer in months.

The revision of the packaging waste directive in the Directive 2018/852 probably does not emphasise prevention enough – it highlights prevention by recycling or reuse or even repair – but not not creating it in the first place. CIWM would encourage measures to reduce consumption, according to the waste hierarchy, rather than on the populist "recycling" measure. This is much more of a communications strategy and changing consumer behaviour requirement than merely providing more bins.

The statistics do not give any assumptions or sources, so are difficult to verify. Those that are quoted do not seem to tally for example the EPA statistics for 2015 show 282KT of plastic packaging waste arising with 34% recycling giving 96KT actually recycled. 2030 Projections based on population increases from 4.7M to 5.5M using 225kg/person suggests a 55% target of 184KT rather than the 175KT or using 200kg/person leads to 163KT. It could be as low as 155KT using the existing tonnages and a 55% 2030 target.

Cognisance and monitoring of what is happening to the direction of travel in Northern Ireland and the UK as a whole or the devolved administrations is essential such that Ireland does not competitively disadvantage itself with regard to materials, products and the value of them as a resource.

Has any financial impact assessment been conducted for the collection of "on the go" plastics for putting in the infrastructure, ensuring the correct collection regime is implemented, recycling or recovering the material stream and a communications and enforcement programme; along with the benefits of same? If not, it should be before any decision on a policy direction is taken as evidence based policy making should be the only way policy and strategy is set.

A report launched on 14 June 2018 by the Resourcing the Future conference (RTF) partners (CIWM, ESA, the Resource Association and WRAP) has developed a novel "use-phase" model to categorise plastic products and looks at targeted actions based on the different environmental impacts of each category.

Entitled 'Eliminating avoidable plastic waste by 2042: a use-based approach to decision and policy making', the report suggests this approach also helps

“clarify” how these can be set within a holistic policy framework, the RTF partners say. The relevant learnings from this report (of a much abused and misunderstood term) should be incorporated into any future strategy:-

- a series of interventions throughout the supply chain that both incentivise sustainable design and production choices, and stimulate demand for secondary plastics;
- develop a more holistic framework for improving the value proposition to underpin the additional reprocessing capacity, market uptake, and consumer communications that are needed to close the loop on plastics;
- a much clearer roadmap for bioplastics is also critical – these materials have significant potential to provide solutions in some areas but unchecked could also have a significant detrimental impact on current plastics recycling. Their potential needs to be clearly mapped and articulated to allow informed decision-making and reduce confusion about their properties and environmental performance; and
- there also needs to be a renewed focus on non-packaging plastics.

The research adopts a system of categorisation based on the length of time plastics are used. This focuses attention on the dominant lifecycle impacts of different products and allows a range of sustainable design and production choices to be identified and priority interventions to drive better environmental outcomes:

- very short use phase (<1 day) small format e.g. cotton buds, plastic stirrers;
- very short use phase (<1 day) medium format e.g. disposable cups, takeaway containers;
- short use phase (>1 day <2 years) e.g. food and cosmetics packaging;
- medium use phase (>2 <12 years) e.g. car parts, electronics; and
- long use phase (>12 years) e.g. cladding, window frames.

In mapping the priority interventions, the research emphasises that there will be no silver bullet. A range of measures across four areas – command & control, technical, economic and communicative – are likely to be needed to incentivise more resource efficient design and use of plastics products, and to support greater capture and recycling of these products at end of life.

This all goes to show that the timing of the reporting and publication of national waste statistics is critical. While the CIWM understands that data needs to be verified, data should be available soon after a period closes – after all cost of living, live register data, tax take data is published and commented upon very quickly after the relevant period ends.

4. Which measures proposed should be given legislative / statutory / taxation / incentives / other backing, as appropriate, by Government?

What is the desired outcome? What is the final desired consumer behaviour? Without knowing these then supporting any measure is pointless. When this is put out to consultation again, it needs to have clearly referenced data and costed

options. At that point organisations can input reasoned and supported arguments for each measure.

The final bullet point in 3.3 could be interpreted as a removal of the self-compliance option for packaging producers. Is this intentional? If not, can it be amended to reflect the choice available? If yes, what justification is there?

We have not been presented with any determination on what “environmentally friendly alternatives” look like or cost. For example there needs to be a significant amount of work related to markings/identification, collection infrastructure, recovery infrastructure, end market development and so on. Without this information, CIWM could not support a strategy based on opinion (Rear Admiral Grace Hopper said “one accurate measurement is worth a thousand expert opinions”).

What are Repak’s modulated fees based on and what is the intended scale of them? What is the intended and likely result of the modulation?

What impact will a Deposit Return System (DRS) have on the proposed strategy? The answer will invariably depend on what form it will take. While not directly linked to the strategy, the Waste Reduction Bill seeks to impose a mandatory DRS. The submission by Voice of Irish Concern for the Environment (Voice) seeks to impose the implementation onto Repak. Repak’s position is that a DRS will detrimentally impact on the achievements and cash flow related to the existing infrastructure. The CIWM is not aware of any successful DRS that has been imposed onto an established household kerbside collection scheme.

Using the Repak presented statistics, and given that in the EU 49MT of plastic was used in 2015, and 39.9% of that was in packaging (ie 19.55MT) and Ireland used 1.4% of that, in the scale of things, it is a very small amount. If this is primarily aimed at the “on the go” or single use material, then only PET bottles (9KT in 2015) and a small proportion of household film (23KT in 2015) and Pots, Tubs & Trays (5KT) will be affected. CIWM would suggest that this a disproportionate amount of effort and spend on infrastructure when a behaviour change regarding reduction of use and littering would be more appropriate and sustainable.

5. Have all stakeholders been identified and their proposed actions been adequately and fairly addressed to deliver/support measures? If not, what changes if any do you propose to balance the burden on stakeholders? If not, which additional stakeholders, if any, should be addressed, and to which measures should they contribute? Please provide supporting reasoning.

Of the 60 organisational types present at the Repak presentation, almost 1/3rd (19) were waste contractors, 9 were producers, 7 were trade associations, 5 were Local Authorities, 5 were manufacturers or converters of packaging, 3 were national regulators, 3 were in education and there were 2 material reproducers with a handful of other individual types. CIWM would suggest that the plan

should be much more widely publicised and so a greater range of views sought and received. If the number of responses from the waste management sector is the only metric, then that will skew the results, and so the strategy and policy, which would be unfortunate and likely to be unsustainable.

Targetting the stakeholders that will be affected by the strategy should be a priority and so their concerns and knowledge of what can be done can be taken into account. For example, suppliers or sellers of on the go (OTG) plastic packaging don't seem to be well represented in the original list of attendees.

Other less obvious stakeholders include specialised contractors and consultants, finance and accountancy practices, environmental and associated legal practices and consumer groups.

On a slightly different but related note, the CIWM would welcome a wider more proactive consultation as part of all new or revisions of prevention, recycling and recovery strategies, including this one.

6. Please provide any additional information that you think should be considered in the development of the Plastic Packaging Recycling Strategy.

Has any consideration been to quantifying the effect that Ireland can have on the quantity, design and polymer constituents of products and packaging being imported into the country?

Has any work been done on what infrastructure and tonnage would be required to be sustainable? Has any consideration been made on the quantities of packaging types that need to be collected to establish an indigenous recycling industry given the lightweight nature of the material and overall tonnages available? If yes, can that evidence be presented. If not, can it be gathered?

From the Repak powerpoint information only 9KT of PET bottles were sold in 2015. 55% of that is less than 5KT and so just over 400T/month or 100T a week – to be collected from all over Ireland. This is unlikely to be commercially viable without significant subvention. Anecdotal evidence would suggest that 10KT per annum is not secure enough and therefore not viable and so at least two Ireland based businesses have set up plastic recycling plants in the UK.

What work has been done to develop end markets for the recovered material? Without end markets the collection activity is pointless (unless it is stored for recovery at a later stage as suggested by Axion's Keith Freegard). Development of clearer pathways in Ireland to attain end of waste criteria is a crucial aspect to support safe and regulated return of recovered material into manufacturing within Europe.

In conclusion, CIWM is very aware of the rapidly changing environment and the environmental impact of plastic. It is also very aware of the need to develop policy and a strategy to complement the aspirations to reduce the life cycle impact of plastics and increase the recovery to meet the various European and

CIWM thoughts on Plastic Packaging Recycling Strategy for Ireland 2018 – 2030

global targets. The Plastic Packaging Recycling Strategy for Ireland 2018 – 2030 as presented needs significantly more detail and then consultation before it could be supported by the professional body that is CIWM.