

## **Comhar Sustainable Development Council Consultation Response on Waste Policy**

**October 2010**

### **1. Introduction**

Comhar Sustainable Development Council (SDC) welcomes the recently published draft statement of waste policy<sup>1</sup>. The implementation of an effective waste policy framework could have a greatly beneficial impact on the economy and environment through reducing pollution, reducing waste, increasing resource efficiency, and increasing innovation and job creation in sustainable design processes, manufacturing and supply chains.

The Minister for the Environment, Heritage and Local Government has signalled his intention to implement waste policy in alignment with the operational objectives and targets of the EU Sustainable Development Strategy 2006<sup>2</sup>, and the Renewed Programme for Government 2009<sup>3</sup>.

Comhar SDC has made previous statements<sup>4</sup> to Government addressing, inter alia, the need for more effective waste policy. This consultation response addresses each of the policy proposals in the draft statement of waste policy and has been prepared based on inputs from the Comhar SDC council and waste working group.

### **2. Key Objectives and Recent Policy Implementation**

Comhar SDC endorses the key objectives of the approach to waste management outlined in section 3 of the policy statement. We welcome the more holistic approach that is being taken with the inclusion of objectives on resource use, climate change and job potential. However, the policy framework for waste management also needs to be set in a wider context. Waste management is only one dimension of resource use and will have limited effect in achieving the objectives unless it is also embedded in a wider sustainable consumption and production (SCP) framework. The Government should take the opportunity with the revision of the National Sustainable Development Strategy (NSDS) to ensure that a SCP framework is developed that supports the new waste policy framework.

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<sup>1</sup> Available at <http://www.environ.ie/en/Publications/Environment/Waste/WasteManagement/FileDownload,23397,en.pdf>

<sup>2</sup> The EU Sustainable Development Strategy 2006 Strategy available at <http://ec.europa.eu/environment/eussd/>

<sup>3</sup> The Renewed Programme for Government 2009 available at [http://www.greenparty.ie/en/government/renewed\\_programme\\_for\\_government](http://www.greenparty.ie/en/government/renewed_programme_for_government)

<sup>4</sup> Comhar Recommendations on the review of the National Sustainable Development Strategy (2007) available at <http://www.comharsdc.ie/files/Comhar%20recommendations%20on%20NSDS.pdf>  
states: "The NSDS should commit to the adoption of a national Sustainable Consumption and Production action plan."

In addition, these objectives will not be achieved without a continued commitment to support the current programmes on waste prevention and their expansion to include other sectors along with a programme focused on reducing residual wastes.

Comhar SDC has used the objectives in section 3 to evaluate the policy proposals and treatment methods for wastes. With regard to waste treatment methods, in addition to the objectives we also recommend the use of criteria such as:

- Whether a technology can be rolled out in a modular way so that long term fixed cost contracts for waste are avoided and flexibility to adapt to changes in projected waste arisings is maintained.
- Whether the outputs are stable and inert.

Comhar SDC supports a revised waste policy that sets the framework conditions to reduce resource use and to reduce and phase out, as far as is practicable, residual wastes. The proposals in this consultation document represent a significant step forward and would be strengthened by the inclusion of measures such as:

- Improved segregated collection systems.
- Resource productivity policies and targets within a SCP action plan.

We support the objectives to increase waste prevention and recycling levels. Recycling can, in the right circumstances, have clear environmental benefits over disposal. For example, see the findings of an international review of life cycle comparisons for key materials in the U.K. recycling sector undertaken by the Waste and Resources Action Programme (WRAP) 2006<sup>5</sup>.

### **3. Responses to Proposed Policy Measures**

Comhar SDC would like to contribute specific comments on the proposed policy measures listed below:

#### **Waste management planning**

Comhar SDC supports the draft policy proposal for a national framework plan for waste management and recommends that there be national oversight in formulating waste management plans. A national waste management plan that provides for co-ordinated, mutually supportive, cost effective and environmentally sustainable waste management across the regions is urgently required. Such a plan must address weaknesses pervading from the currently un-coordinated inter-regional approach. For instance, the current system does not always allow for informed, economically viable decision making across the ten existing waste management regions in Ireland. In theory, competing waste companies may receive permission for identical waste facilities sited within close proximity of each other, where the sites are situated in adjoining waste management regions. As inter-regional transfer of waste is permitted under the regional plans this can have negative implications for the viability of schemes, not to the mention social and environmental impacts that may arise. Joined up thinking arising from a mutually supportive strategy is required so that plans are co-ordinated across boundaries and regions.

Comhar SDC welcomes the proposal for a waste planning stakeholder forum to contribute to the development of the plan and maintains this must be cross-sectoral as it will be an important mechanism for overseeing the development of the national framework plan. Consideration should

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<sup>5</sup> See ENVIRONMENTAL BENEFITS OF RECYCLING An international review of life cycle comparisons for key materials in the UK recycling sector Waste & Resources Action Programme (WRAP) May 2006 available at [www.wrap.org.uk/.../Recycling\\_LCA\\_Report\\_Executive\\_Summary\\_Sept\\_2006.f6589efe.2839.pdf](http://www.wrap.org.uk/.../Recycling_LCA_Report_Executive_Summary_Sept_2006.f6589efe.2839.pdf). The study used the following Environmental impact categories used for the assessment of material systems: energy use/generation resource consumption, global warming potential, other energy-related impacts (acidification potential, nutrient enrichment potential, photochemical ozone formation potential), toxicity potentials, waste generation, and other (e.g. land use, stratospheric ozone depletion potential).

be given to expanding the remit of the Nation Waste Prevention Committee (NWPC) to perform this function.

### **Household waste collection market**

Comhar SDC endorses the proposal for a statutory obligation to ensure local authorities have overall responsibility for household waste collection. The detailed operational procedures should be subject to consultation with key stakeholders. Consistent standards in household waste collection services are essential to delivering a high quality waste management system that facilitates improvements in recycling rates and encourages the diversion of waste away from landfill.

Furthermore, dealing with waste at a local level can bring benefits to local communities, for example, through the creation of employment and the extraction of materials that can be used as resources locally. Collected waste resources could be utilised in the development of eco-industrial parks to support Ireland's green economy and SCP objectives.

### **Waste management regulation**

Comhar SDC supports the proposal to have a single national waste regulator and welcomes the proposal to consult further on the details of the new regulatory arrangements. In 2006, Comhar SDC made a submission to the Department of the Environment, Heritage and Local Government highlighting the need for a national regulator. Comhar SDC wishes to highlight the major conflict of interest that would arise if local authorities were designated as the primary regulators of the waste industry, while simultaneously holding responsibility for household waste collection services. Comhar SDC maintains that the task of regulation should be given to a body that is not directly involved in the waste management process and is not linked to the local authorities.

### **Direction of waste**

Comhar SDC endorses the proposal to introduce measures to ensure that no local authority should enter into any contract for treatment or disposal for quantities of waste which would exceed those that they or their agents might reasonably expect to control, in the context that the waste management process has to meet operational costs and that the direction of waste should have regard to the proposed national framework. In addition, waste management facilities must be designed to cater for appropriate capacities and decisions on capacities must be taken in view of the existing infrastructure available, in addition to information on projected waste arisings.

Comhar SDC is supportive of the proposal to introduce a series of residual waste treatment levies to contribute to ensuring that waste is driven towards environmentally preferable and value added treatments such as composting, anaerobic digestion and recycling. It should be noted, however, that some post-treated black-bin waste is unlikely to be suitable as compost, and may have to be disposed of rather than recovered.

Comhar SDC endorses the 'polluter pays' principle and suggests a levy on waste treatment facilities, including incineration, that reflects the associated environmental damage. In this regard, different rates would automatically apply to inert and biodegradable landfill. The levies would thereby apply principles of environmental economics to maximize the fraction that can be economically and environmentally re-used, composted, recycled, or sent to anaerobic digestion in line with the waste hierarchy.

In discussing the direction of wastes Comhar SDC consider that there are many challenges remaining in meeting the targets of EU regulations, for example, the National Strategy on Biodegradable Waste should be implemented in order to meet the targets of the EU 1999 Landfill directive. Meeting targets of EU regulations and the objectives of the waste policy statement will also depend on implementation of strategies already in place.

In addition, Comhar SDC maintains that requirements for the direction of wastes should have regard to the proximity principle, while ensuring that waste management facilities are economically viable. Currently landfill rates vary across the country with the effect that waste operators are incentivised to transfer large volumes of waste across the country to locations where it can be disposed of cheaply. This can lead to increased environmental impacts and increased green house gas emissions. National waste policy should contain provision for implementation of the proximity principle in line with the protection of the environment and public health. The proposed national waste framework previously referred to has a role to play in co-ordinating regional waste facilities so that their viability can be met by the acceptance of wastes that are generated within the region in which they operate.

### **Level of service**

Comhar SDC endorses the proposal for minimum standards for levels of service, such as the provision of segregated collection systems to ensure recovery, materials of sufficient quality for reuse or recycling, or commingling where mechanical sorting is available post-collection. Contamination of recyclates leading to disposal is a major problem with co-mingled collection systems. We support the minimum standards proposed and these should be combined with increased civic amenity site provision and bulky waste collection and recycling. Consideration should also be given to services for different residential types and the provision of communal receptacles or bins for those living in apartments. .

### **Obligation to use waste services**

Comhar SDC welcomes this in principle given the current volume of uncollected waste and practice of backyard burning. However enforcement of such a policy would be challenging. The introduction of any mandatory obligation should be informed by a programme of stakeholder engagement that clearly sets out the costs of not complying with the policy and the benefits of doing so; a cost-benefit analysis and an appropriate accounting framework that encompasses appraisal of long-term social and environmental benefits.

Existing mechanisms should be used where possible and this could include extending the Tidy Town's Committee role to guide/monitor and award local communities for better waste management. In addition, the role of the Local Authority Prevention Demonstration (LAPD) programme could be extended.

### **Targets and incentives for residual waste**

Comhar SDC welcomes the proposals for targets and incentives for residual wastes, but acknowledges that a range of challenges need to be addressed. The development of policies to remove these materials and products from the waste stream needs to be underpinned by research which provides a robust evidence base for these policies, both in terms of accuracy of data and the effectiveness of the various policy options. The policies that will be needed to address residual wastes can be divided into two categories. Firstly those that are necessary to create the framework conditions under which high re-use, recycling and recovery can be achieved and residual wastes can be reduced and secondly, those that specifically address the materials and products that end up in residual waste.

A key issue is the waste classification system, as waste strategies at national and European levels increasingly acknowledge that a life cycle approach is needed to address the underlying causes of residual wastes, the 'traditional' waste classification systems increasingly become a barrier to this approach. The priority areas for residual waste arisings are often related to activities which do not fit with traditional waste/material or even product categories or classification systems i.e. DIY waste and having children (nappies, tissues, wipes). Policies to address residual wastes from these activities need to be targeted to specific materials or

products. Further development of policies and actions targeted at residual waste will be necessary to reach these targets including campaigns targeted at householder activities.

Although Comhar SDC welcomes the proposed targets and incentives for residual waste for local authorities, Comhar SDC maintains an adequate waste management infrastructure must be available in order for these targets to be met. In addition, greater clarity is needed as to how local authorities will monitor progress in this area. The LAPN programmes could be recognised here as having a major role to play in helping communities reduce residual wastes.

Comhar SDC welcomes the intention to build on the success of the recycling infrastructure and maintains that a better recycling infrastructure is required nationally. Ireland exports waste as it may seem cheaper to export waste rather than build a national reprocessing infrastructure. The barriers to setting up a national reprocessing infrastructure must be addressed and recycling services need to be improved so that residual wastes are reduced.

### **Waste facility levies**

Comhar SDC endorses the introduction of a levy on municipal waste treatment facilities, including incineration, that reflects the associated environmental damage. Comhar SDC notes that hazardous waste is sometimes generated as an unavoidable by-product of processes. Comhar SDC maintains that where there is an alternative economically viable option to generation of the hazardous waste component then it must be favoured. The levy could possibly be paid back into a fund for R&D for sustainable production, zero waste production processes and cradle-to-cradle design innovation. See also *4. Additional Observations*.

### **Incinerator bottom ash**

Comhar SDC supports the recommendation that the classification of incinerator bottom ash as hazardous be examined and welcomes the further work in this area.

### **Recycling targets**

Comhar SDC welcomes the proposed recycling targets and knock-on job creation potential, but recognises the need for greater investment in building reprocessing infrastructure so that Ireland may work toward a more self-reliant recycling process. Where the revised targets significantly exceed our EU obligations Comhar SDC recognises that there may be a need for cost-benefit analysis and an appropriate accounting framework appraisal of long term social and environmental benefits.<sup>6</sup>

Comhar SDC supports the full application of the polluter pays principle as a mechanism for increasing recycling rates. However, application of the polluter pays principle should be supported by a cost-benefit analysis and stakeholder consultation. There has been greater emphasis on the municipal waste stream to date than other waste streams. While the municipal waste stream is more complex, it is also smaller in overall volume than commercial and industrial waste streams so greater emphasis must be given to reducing waste arisings and increasing reuse and recycling of commercial and industrial waste, while recognising that many private firms have already made significant progress in this area.

In paying for waste collection the onus should be placed on the company that produces the product and packaging as well as the householder.

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<sup>6</sup> Comhar SDC notes the example of the full cost-benefit accounting model utilised in the Nova Scotia GPI solid waste-resource accounts. Available at [www.gpiatlantic.org/pdf/solidwaste/solidwaste.pdf](http://www.gpiatlantic.org/pdf/solidwaste/solidwaste.pdf)

Comhar SDC notes a research programme called RE-Evaluate is being supported by EPA STRIVE to investigate the potential for re-use of used and waste electronic equipment. Comhar SDC endorses this initiative and highlights the need to promote and implement the repair/re-use of additional waste streams.

### **Producer responsibility**

Comhar SDC supports extended producer responsibility. In extending producer responsibility schemes a cost-benefit analysis and regulatory impact assessment taking account of economic and environmental issues should be carried out. We consider extended producer responsibility to be a key mechanism for reducing residual waste arisings and increasing reuse and recycling rates. Any proposals for reduction or abolition of the *de minimus* exemption under the Packaging Regulations should carefully consider the full range of costs and benefits.

The draft statement does not provide sufficient guidance on how to bring new waste streams, for example, textiles, into producer responsibility initiatives. It is critical that national strategy assigns producer responsibility for all waste streams and sets in place the capacity to deal with these waste streams in the future. The National Hazardous Waste Management Plan, for example, identifies that extended producer responsibility may be helpful in financing and organising the take-back of waste human medicines, farm chemicals/medicines, waste oils/filters, paint containers, household garden chemicals and ink packaging. Further elaboration and consultation with stakeholders is necessary on how this extended producer responsibility might work. Comhar SDC notes that monitoring of existing producer responsibility initiatives is under the remit of the NWPC and notes that the draft statement does not provide specific guidance on how additional producer responsibility would be monitored.

### **Waste prevention**

In alignment with the 2009 revised EU Sustainable Development Strategy<sup>7</sup> and the revised EU Waste Framework directive<sup>8</sup> Comhar SDC recommends life-cycle thinking be incorporated into waste management policy. Comhar SDC notes that “avoiding the generation of waste and enhancing efficient use of natural resources by applying the concept of life-cycle thinking and promoting reuse and recycling” is identified as an operational objective and target in the revised EU Sustainable Development Strategy published in June 2006<sup>9</sup>.

Comhar SDC maintains that greater focus domestically should be on Green Public Procurement (GPP) than on upstream product design considering the current level of imported products. In addition, Comhar SDC recommends incentives to encourage eco-design and a zero-waste society, see 4. *Additional observations – Incentives to encourage sustainable production.*

### **Economic development**

Comhar SDC recommends that design for zero-waste be part of Ireland's economic strategy. The economic gains from improved waste management can be maximized by identifying synergies across policy areas, including energy and transport policy. Biogas from anaerobic digestion of wastes can be used to fuel vehicles and Stockholm and Lyon run their bus fleets on biogas derived from wastes. Further research would be necessary to determine whether and how this renewable transport fuel and the associated infrastructure could be adopted in the Irish context. Wider economic synergies should be identified by the waste policy in alignment with proposals for

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<sup>7</sup> The EU Sustainable Development Strategy 2006 Strategy available at <http://ec.europa.eu/environment/eussd/>

<sup>9</sup> The 2009 review of the EU Sustainable Development Strategy is available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2009:0400:FIN:EN:PDF>

job creation, GPP, and skills and training for the Green New Deal<sup>10</sup>. Recent research by FOE Europe<sup>11</sup> demonstrated on a European level, if a target of 70% for recycling of key materials was met conservative estimates suggest that across the EU27 up to 322,000 direct jobs could be created in recycling an additional 115 million tonnes of glass, paper, plastic, ferrous and non ferrous metals, wood, textiles and biowaste. These jobs would have knock on effects in down and upstream sectors and the wider economy and could create 160,900 new indirect jobs and 80,400 induced jobs. The total potential is therefore for more than 563,000 net new jobs. If Ireland wants to harness this job creation potential then the development of a domestic reprocessing industry is key, along with creative thinking on the synergies between waste and policy areas such as climate change and transport.

### **The Environment Fund**

The Environment Fund is an essential mechanism in supporting the implementation of waste policy in Ireland. Environmental taxes should be revenue neutral with transparent hypothecation. The Environment Fund should remain under the authority of the Department of Environment, Heritage and Local Government.

Comhar SDC welcomes the consideration of opening of the Environment Fund to the private sector for proposals for financial support in respect of the development of waste recovery facilities, which will contribute to meeting Ireland's landfill diversion targets.

## **4. Additional Observations**

In addition to the responses to the proposed policy measures Comhar SDC would like to offer the following observations:

### **Domestic reprocessing of waste / export of waste**

Comhar SDC supports measures to increase the amount of domestic reprocessing to reduce exports of waste, reduce GHG, and create jobs and a domestic waste industry having regard to specific Irish circumstances. Comhar SDC does not believe the proposed measures provide sufficient guidance in achieving these objectives.

### **Hazardous waste**

Comhar SDC maintains that the draft statement must address how to deal with hazardous waste. Currently hazardous waste is exported because it is not economically viable to deal with it domestically. It is desirable that it becomes economically viable for companies to send small volumes of hazardous waste for treatment in Ireland.

### **Maximising revenue from the resource potential of waste**

Comhar SDC endorses the maximisation of revenue from the resource potential of waste as long as measures are in place to ensure that any governmental policy interventions are cogniscent of wider social and environmental aspects and ensure interventions do not incentivise waste maximisation.

Comhar SDC maintains that consideration could be given to the creation of a waste accounting system that provides waste statistics by economic sector (NACE category). It is recommended that the CSO should provide support to the EPA in the area of waste statistics, with a particular priority being the generation of statistics on waste production and management by economic

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<sup>10</sup> See the Green New Deal available at <http://www.comharsdc.ie/themes/index.aspx?TAuto=8>. In 2010, Comhar SDC published a report 'Skills and training for a Green New Deal'.

<sup>11</sup> FOE Europe (2010) More jobs less waste. Potential for job creation through high recycling rates in the EU and UK.

sector (NACE category) and that the ongoing improvements and development of waste statistics be used as the basis for the development of a satellite account for wastes (NAMEA).

### **Waste classification**

Comhar SDC recommends that consideration be given to revision of the waste classification scheme to develop a system that enables an integrated approach to be applied along the supply chain to the products and materials which eventually become residual waste.

### **Landfill ban**

Landfill bans have been implemented in other European countries in line with the development of appropriate recovery options. A snapshot analysis carried out for Friends of the Earth Europe<sup>12</sup> on the quantity and market value of resources that are incinerated and landfilled in Europe calculated that the EU disposed of materials with a minimum potential monetary value of €5.25 billion. The analysis was carried out using 2004 data to enable an EU-27 comparison and estimated that Ireland disposed of materials with an estimated net value of €68.33 million. The intention was to provide policymakers with an initial estimate, an order of magnitude of the potential available in the resources we currently waste. Comhar SDC considers that a more rigorous cost-benefit analysis and appropriate accounting framework appraisal of long term social and environmental benefits could help to justify the reduction of stabilised residual wastes beyond what is required under EU obligations.<sup>13</sup>

### **The utilisation of MBT, incineration and landfill**

The summary of relevant research contained in the Annexes of the International Review of Waste Management Policy 2009<sup>14</sup> compares a range of waste treatment technologies. Table 62-3 of that report provides a summary of the best and worst performers against six criteria: Arrowbio Anaerobic Digestion (AD) MBT is listed as having the best performance in the categories of abiotic resource deletion; global warming potential; and acidification. Ecodeco MBT is listed as having the best performance in the category of freshwater aquatic eco-toxicity. The Chineham incinerator is listed as having the best performance in the categories of human toxicity and eutrophication.

The foregoing illustrates that it can be misleading to make generic assumptions about the overall environmental impact of different technologies within the hierarchy. Nevertheless, Comhar SDC notes that in terms of GHG emissions a number of recent studies favour MBT over incineration and landfill, for example, the 'Greenhouse Gas Balances of Waste Management Scenarios Report for the Greater London Authority' Eunomia January 2008<sup>15</sup>.

Comhar SDC also notes the 2008 STRIVE report on MBT<sup>16</sup>, 'Critical Analysis of the Potential of MBT for Irish Waste Management, STRIVE Report Series No. 16'. This report is a comprehensive review of MBT and its potential application in Ireland and should be referenced with respect to any policy interventions in this area.

### **Incentives to encourage sustainable production**

In working towards the prevention of wastes and an enhanced framework for sustainable production (as part of a wider SCP policy framework), Comhar SDC recommends incentives to

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<sup>12</sup> Reference: Friends of the Earth Europe (2009) Gone to waste - the valuable resources that European countries bury and burn.

<sup>13</sup> Comhar SDC notes the example of the full cost-benefit accounting model utilised in the Nova Scotia GPI solid waste-resource accounts. Available at [www.gpiatlantic.org/pdf/solidwaste/solidwaste.pdf](http://www.gpiatlantic.org/pdf/solidwaste/solidwaste.pdf)

<sup>14</sup> Available at <http://www.environ.ie/en/Publications/Environment/Waste/WasteManagement/FileDownload,21596,en.pdf>

<sup>15</sup> Available at <http://www.eunomia.co.uk/shopimages/Eunomia%20GLA%20Main%20Report%20Final.pdf>

<sup>16</sup> Available at <http://www.epa.ie/downloads/pubs/research/waste/name,25798,en.html>



encourage eco-design, for example, cradle-to-cradle design, to be embedded in the product design process. Proceeds from levies on waste treatment facilities, including incineration, could be put toward a fund for encouraging companies toward eco-design processes. This process could be aligned with the EPA Strive Cleaner, Greener Production Programme.

Comhar SDC suggests that cradle-to-cradle design, design for recycling, closed-loop design, design for zero-waste, design for longevity, and design appropriate for more self-reliant communities are areas that producers could focus on to reduce waste. Incentives could be provided so that producers have a tax or VAT advantage. A producer/importer should have a distinct advantage if their product is designed so that it is easily repaired, recycled, re-used or produces zero-waste. Such incentives could build upon and have regard to existing regulations, such as Persistent Organic Pollutants (POPs) Regulation, Polychlorinated Bi-phenyls (PCBs) Regulation, Ozone Depleting Substances (ODS) Regulation, and Fluorinated Greenhouse Gases (F-gas) Regulation.

### **Sustainable consumption and production (SCP) and co-ordination with existing programmes and strategies**

Comhar SDC re-iterates the importance of SCP as the over-arching principle for guiding waste policy formation and this principle should be reflected in the draft statement of waste policy. Although some of the measures included in the sections on waste prevention and producer responsibility allude to the sustainable production process, with fiscal incentives and targets for working towards reducing wastes included, there is little guidance in the way of practical measure for how business and communities can achieve sustainable production processes and sustainable consumption.

Comhar SDC maintains that the draft statement on waste policy should provide greater reference to existing programmes and strategies. The National Waste Policy should act as the overarching framework for waste management in Ireland. As such the national policy must clearly set out the links between national policy and the full range of waste prevention and reduction programmes co-ordinated by various bodies such as the EPA and local authorities. Although the draft statement on waste policy provides a commitment to continue to support the National Waste Prevention Programme (NWPP) it makes no reference to work carried out to date under the NWPP that could be drawn upon, such as the NWPP 2009-2012. Specific measures contained in the NWPP 2009-2012 that should be referenced in national waste policy include the Local Authority Prevention Network (LAPN), the Green Business Initiative, Green Hospitality Awards and the Green Homes Programme.

Furthermore, the Integrated Pollution Prevention and Control (IPPC) and waste facility licensing and enforcement work carried out by the EPA applying Best Available Techniques (BAT) should also be referenced in terms of how they may lead to greater improvements in the areas of sustainable resource use, consumption and waste. It is essential that clear actions be set out as to how this objective can be met. Responsibility needs to be assigned to those already working within the area, such as the EPA STRIVE research programme, which includes the Cleaner, Greener Production, and the Environmental Technologies programmes, promoting sustainable business practice.

The realisation of effective waste policy could have a greatly beneficial impact on the economy through reducing pollution, reducing waste, increasing resource efficiencies, and increasing innovation and job creation in sustainable design processes, manufacturing and supply chains. For these benefits to be realised the government should take the opportunity provided by the revision of the NSDS to commit to a more comprehensive SCP and resource use framework and identify synergies between a revised waste policy, SCP and green economy initiatives led by other departments.

### **Implementation costs**

The draft statement should be subject to a cost-benefit analysis and full regulatory impact assessment.

## **5. Summary**

The new waste policy when in place will provide an improved policy framework, however co-ordination with existing programmes and strategies is required. In alignment with the goals of a low carbon, resource efficient and ecologically friendly society, Comhar SDC has provided responses to the draft statement of waste policy and additional observations. The importance and significance of waste policy based on best practice cannot be underestimated, particularly in relation to the potential contribution it will make towards sustainable development.

The recommendations Comhar SDC has provided have the potential to add to the effectiveness of the proposed waste policy, and to provide a waste policy framework within which Ireland will meet, and where possible exceed, EU targets for environmental performance in waste management.

Comhar SDC notes the waste prevention programmes and pilot schemes in operation by the EPA and endorses the EPA's view that waste prevention initiatives should be expanded nationally as the pilot phases are completed and suitable mechanisms, including funding and human resources, are made available to achieve this.

Comhar SDC endorses the promotion of the ongoing development of a culture of waste prevention and resource efficiency in Irish society. Improvements in these areas as outlined in this response paper will contribute to national competitiveness and progress with the Green Economy, Climate Change and Sustainable Consumption and Production policy agendas.