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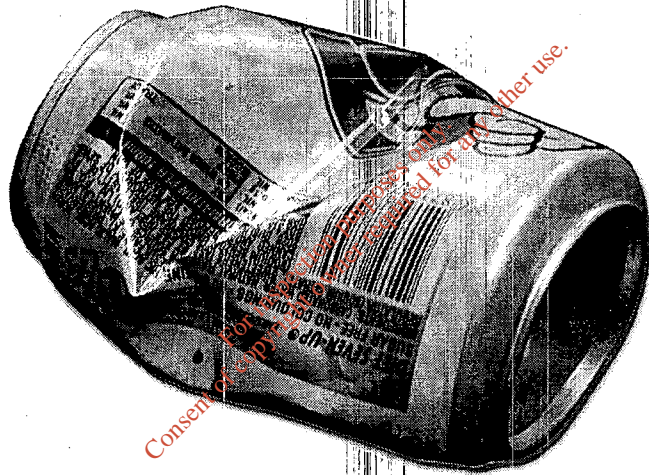
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Sinn Féin

Environmental Protection Agency

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Towards Zero Waste in the Dublin Region



Dublin Sinn Féin submission to the review of
'Waste Management: A Strategy for Dublin'

August 2004



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Forward

Waste management is one of the major challenges facing us all. We can no longer simply brush the problem under the carpet or indeed burn or bury the problem. But that is where our approach has been fundamentally flawed. We have always viewed 'waste' as something that we must get rid of in the easiest, cheapest way in far off places. That is where our relationship with waste must change. We must view waste as something that is of value, something that is in fact a resource. Only then, will we as a society stop burning and burying it and start reducing, reusing and recycling.

In this submission Sinn Féin hopes to highlight this. We realise we do not have all the answers nor all the solutions. But we do realise that any waste management strategy must have guiding principals. These principals must be:

- No incineration.
- Phase out landfill.
- An all Ireland Waste Strategy.
- Consultation with, and inclusion of local communities.
- Waste Strategies must be a reserve function of local authorities.

Sinn Féin aim to continue to work with NGOs, other political parties and our communities to ensure that no incinerators are built in Ireland, landfill becomes a thing of the past and our society becomes a Zero Waste society.

Is mise,

Councillor Daithí Doolan,
Sinn Féin Representative,
Dublin South East.

Introduction

Sinn Féin welcomes the opportunity to participate in the review of 'Waste Management a Strategy for Dublin'. Sinn Féin is committed to the promotion of environmental renewal through investment in reduction, recycling and policies working towards a zero waste economy. Across the 32 counties Sinn Féin activists have been to the fore in campaigns crucial for the harmony of environmental protection and sustainable economic growth by working against the construction of toxic incinerators, bin charges and the proliferation of landfill sites. Where elected our representatives have continued to promote progressive, sustainable solutions to the waste management crisis.

In this submission we will outline our opposition to the ethos underlining the strategy as formed in 1998 and will outline our recommendations for a change of direction for waste management in the Dublin region to one which is sustainable and makes greater environmental and economic sense. Under the current waste management plan this is not the direction which is being taken. We believe that the Dublin region must develop sustainable solutions for the regions waste management crisis based on the wealth of information from many developed waste reduction programmes operating internationally.

The disposal of waste causes a particularly difficult problem for economic and environmental planners in that the more waste that is produced the more resources and expenditure are needed to dispose of that waste. The energy expended in increasing production; the packaging which is seen by manufacturers to be necessary; and the pollution which is created through the whole production process puts great strains on the environment and its sustainability.

Consecutive government policies of increasing the use of incinerators as an alternative to diminishing landfills is a clear example of the inverted approach of detrimentally starting at the bottom of the hierarchy. Such an approach is neither sustainable nor eco-friendly. Sinn Féin is calling for the establishment of an all-Ireland waste management strategy, including an island-wide drive to research and establish markets for reclaimed materials.

Sinn Féin believes that the Waste Management Plan for Dublin must be modified to place the emphasis on to the promotion of strategies at the top of the waste hierarchy (reduction, reuse, recovery where it is without damaging consequences) instead of the status quo which focuses on strategies at the bottom (recovery and disposal).

The fact that 80% of waste, since the adoption of the current waste management plan in December 1998, in the Dublin City Council area is still going to landfill shows that little progress has been made. Given that 136,000 householders in the Dublin City council area are now using green bin or bag service it raises questions regarding enforcement and compliance with the bye-laws regarding segregation

The fact that the plan has as it's focus is compliance with obligations under EU legislation rather than to bring about the sustainable management of resources in the Dublin Region is a fundamental flaw. The plan is based on the outdated premise that waste is something for which we must find ways to get rid of, rather than viewing it as a resource. It is based on an outdated linear view of waste management rather than trying to close the loop in a cyclical process.

The primary objective must be maximum diversion away from incineration and landfill. Sinn Féin disagrees with the view in the plan that Maximum Realistic Recycling with Thermal Treatment is the "best Practicable Environmental Option, most likely to provide robust sustainable Waste Management System for the region in accordance with legal and practical requirements". We are calling on Dublin Waste Strategy Co-ordination Group to review this conclusion.

We would ask that the Dublin Waste Strategy Co-ordination Group have the courage to accept that the Plan as formed in 1998 with its reliance on incineration will perpetuate the throwaway society, does nothing create a public understanding of waste as a resource, fails to adequately tackle over-packaging and over-consumption and needs to be fundamentally revised.

We would like to utilize this submission to express our dissatisfaction at the fact that as a result of provisions contained in the Waste Management Act 1996 and the Protection of the Environment Act 2003 the making, review, variation or replacement of a waste management plan has become an executive power of the city or county manager. We are calling for reinstatement of this power as a reserved function of democratically elected local representatives.

Sinn Féin believes that Dublin as the capital can and must lead the way for the rest of the country in the drive towards a zero waste solution.

Incineration

The Waste Management Plan states that it seeks to address the “public perception of thermal treatment technologies as unsatisfactory in terms of the impact of recycling and potential atmospheric emissions”. Sinn Féin along with communities across Dublin remains opposed to incineration which causes air pollution, the emission of toxic fumes and an increased volume of traffic generated by the transportation of waste to and from incinerators. One other aspect of incineration is that after burning, the remaining ash, which is usually 20-30 per cent of the mass of waste, still needs to be disposed of in landfill. A further approximately 7%, known as fly ash, is classified as toxic waste which cannot even be disposed of in landfill and requires further treatment. In addition, building an incinerator is a large capital cost. Once built, it must be used on a continuous basis, which will ‘lock in’ incineration as the primary method of waste disposal.

Some particular problems with incineration include:

- Air emissions of sulphur dioxide, nitrogen dioxide, chlorine, dioxin and fine particulates
- Emissions of greenhouse gases of CO₂ and nitrous oxide (N₂O)
- Ash which remains after incineration needs to be disposed of
- Toxic fly-ash produced through incineration process remains a major problem
- Increase volume of traffic to and from the incinerator
- Demands production of waste

Sinn Féin calls for all chemico-energy approaches (landfill & incineration) to waste disposal to be phased out and ultimately abandoned. Sinn Féin calls for the prohibition of the option of incineration or thermal treatment from regional and central waste management plans and strategies.

Sinn Féin proposes that the IR£115 million of the capital investment for the plan intended for the provision of a thermal treatment facility for the region based on the Poolbeg Peninsula be invested in facilitating reduction, reuse and recycling.

Recommendations:

- **Phase out land fill**
- **Abandon plans to build an incinerator in Dublin and use capital to invest in reducing, reusing and recycling of waste.**

Reduction

In the hierarchy of reduction, re-using, recycling and re-use, reduction remains the most important and yet remains the one which we have made least progress on. The underlying problem is that people will not begin to reduce unless reduction is accessible, there are financial incentives and people understand the necessity for resource conservation. We need to value resources before we understand the need to conserve them. In forming a strategy to bring about reduction we need to seek to facilitate, enable and motivate householders and the corporate sector in order to bring about behavioural change.

The strategy for Dublin needs to place a greater emphasis on reducing the amount of waste that is being created. To date, with the exception of the bag levy, reduction has remained a voluntary choice where neither penalties or levies apply for the failure to address over-consumption, over-packaging and wastage.

Residual waste, once recycling and composting is put in place should consist of those products and substances which cannot or are not easily recycled. This needs to be the primary target of council and government attempts at reduction. The target should be to eliminate residual waste by tackling over packaging and the production of non-recyclable goods. Central government will not act to bring in taxes or prohibitions unless they come under pressure from local authorities in this regard. As the body which will bare the cost of dealing with such waste, it is local authorities own interest to lobby for such measures. Reduction needs to encompass phasing out of products which are not biodegradable, reusable or recyclable.

It is possible for the waste content of consumer good packaging to be substantially reduced and consumer goods redesigned to take account of the problems of disposing of not only the product itself but also, their harmful by-products. Sinn Féin believes that medium and long term targets should be set for reducing the amount of needless paper, cardboard, plastic and metal packaging that is now such a significant feature of most manufactured goods. The costs of this should be borne by the producers and retailers of the goods not the consumer. Sinn Féin also proposes that much greater resources be put in to waste prevention schemes. Sinn Féin calls on the City Council to make a submission to the Minister for the Environment, Heritage and Local Government asking him to introduce regulations under Section 28 and 29 of the Waste Management Act 1996 to bring about waste prevention and minimisation. The making by the Minister of regulations under the Act of 1996 has the ability to save local authorities considerable revenue by putting responsibility back on producers of waste

- Simple changes in how goods are packaged and sold can achieve substantial reductions in the amount of waste we produce. Sinn Féin is calling for regulations provided for under section 29 subsection 4 of the Waste Management Act 1996 to be introduced requiring labelling or marking of products or substances or its packaging so as to identify and specify the composition of the product, substance and packaging; the potential hazards of the product, substance and packaging in the event of its being recovered or disposed of or; the potential of the product substance or packaging to be recovered. This labelling should be comparable to the labelling of health risks on cigarette packets. Labelling can also be used to highlight minimally packaged goods.
- We are calling for the Minister to use his powers to require producer of products which the council has identified as being difficult or impossible to recycle to carry out a life cycle analysis in relation to the product and to prohibit, limit or control the production or use in production of substances which are damaging to the environment or which are not biodegradable or recyclable.
- We are calling for the Minister to specify requirements to be complied with respects to the design, composition and production of packaging in line with the international standard of eco-labelling.

The aim must be to eliminate secondary packaging such as boxes, plastic wraps and cartons which are totally unnecessary. From the householders point of view in the first instance the Minister should use the provisions to make regulation under section 29 of the Act of 1996 to compel sales outlets to provide free of charge specified facilities for the removal by customers of packaging from products or substances purchased by them at that outlet and receptacles for the deposit of such packaging. He must be lobbied to introduce such regulations. Long term the aim needs to be to make it economically unviable for producers to include such unnecessary secondary packaging.

Recommendations:

- **Greater emphasis on reducing the amount of waste that is created.**
- **Medium and long-term targets set to reduce paper, card, plastic and metal packaging.**
- **Greater resources to be put in to prevention schemes.**

- **Dublin regional local authorities to make representations to Minister for Environment, Heritage and Local Government to introduce regulations to bring about waste reduction.**
- **Labelling to identify specify the composition of the product and it's packaging.**
- **Sales outlets to provide facilities for removal of packaging by customers.**

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Reuse

Sinn Féin is calling for the 4 Dublin Councils to make a submission to the Minister requesting that he introduce regulations under section 29.4(f) of the Waste management Act 1996 requiring a producer, distributor or retailer to operate a deposit refund scheme in relation certain products such as beverage containers, batteries etc made, distributed or sold by him or her. This will create an incentive for people to re-use products.

Sinn Féin is calling for a comprehensive strategy for agricultural waste, concentrating on the biological treatment of waste in an environmentally friendly and sustainable manner.

Recommendations:

- **Dublin regional local authorities request Minister for Environment to introduce refunding mechanism.**
- **Comprehensive strategy for treatment of agricultural waste.**

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Recycle & Composting

Making it simple and accessible for people to recycle must be central to the Dublin's local authorities waste management strategy.

Source separation has proved to be a key component in the successful diversion of waste from landfill and incineration in other states. Source separation reduces the cost for local authorities who then do not have to finance the sorting of waste for recycling. It also facilitates the recycling process. It has also proved in other jurisdiction to have a beneficial impact in creating a public understanding regarding recyclable products and the value of resources.

Given time, recycling can become the best economic option, as well as the better environment option. For example it is estimated that glass products constitute approximately 7.5 per cent of domestic waste. Recycling reduces the work and expense incurred by local authorities in disposing of this waste. It also reduces the demand for expensive landfill space.

Dublin City Council's 'Bye-law for the collection, storage and presentation of household waste and certain related waste management matters' which came into affect on 01/11/01 makes provision for limited separation of waste into 3 separate fractions. The collection of garden waste and organic kitchen waste has yet to be activated by Dublin City Council

Sinn Féin proposes that the four Dublin councils use the money earmarked for the incinerator to provide the infrastructure for full separated waste collection. We are calling for

- Distribution of kitchen pre-sort bins free of charge to facilitate householders in the Dublin region in the sorting of their waste
- Distribute compost bins to householders in the Dublin regions and enforce a prohibition on organic waste, glass and other fractions which are either collected separately or for which recycling facilities or deposit refund schemes operate from residual waste. Because the majority of homes in the Dublin region have gardens the potential for intensive home composting is high.
- Breakdown of goods currently provided for collection in the green bin in Appendix A of the above by-law into further separate fractions for collection.
- Investigate the possibility of switching to co-collection so that a number of these fractions can be collected on the same day, therefore saving on transport and collection cost. Otherwise consider

putting out to tender to recycling enterprises the contract for the collection of particular fractions of waste whereby those enterprises could receive a small subvention from the local authority but would not be permitted to charge the customer but would make the profit by selling on the collected recyclables or by recycling it themselves.

- Enforcement through incentives, warnings and fines for proper sorting of waste by householders and the corporate sector

The lack of a market for recyclables has often stated as an obstacles to recycling. Central government must intervene to create markets for recyclables. Dublin's local authorities must lobby the Minister for Environment, Heritage & Local Government to introduce regulations under 29.4(l) of the Act of 1996 to require a producer of a product to use recovered materials or components in the productions of the product or substance, or prohibiting or limiting or controlling in a specified manner and to a specified extent the use of specified virgin material in such production. We are proposing the Minister apply these regulations, in the first instance, to the use of construction and demolition waste in engineering and road building projects and the use of used newsprint in the production of new newspapers. Creating such specifications will serve to create a market for recyclables therefore saving the state and councils the expense incurred in disposing of this waste.

The loss of the Irish Glass Bottle factory was a serious setback to recycling here in Ireland, but particularly here in Dublin. The Irish Glass Bottle Factory in Ringsend is referenced as central to glass recycling in the region in 'Waste Management a Strategy for Dublin'. It states that "The Irish Glass Bottle Co. LTD. in Ringsend has the capacity to treat all glass collected in Ireland. Glass must be delivered according to quality standards, including requirement for colour separation". Sinn Féin believes that the closure of this plant was regressive and believes that the Minister for the Environment, Heritage and Local Government, the Government and the Council's in the region could do more to intervene to save re-establish this plant if they are serious about recycling in the Dublin region. All glass in the state is now transported to Fermanagh which involves substantial energy output in terms of transport and would therefore appear to contradict the proximity principal which highlights a need to treat and/or dispose of wastes in reasonable proximity to their point of generation.

While it is accurate to say that parts of Section 29 of the Waste Management Act of 1996 require retailers to accept packaging and other material returned to them by consumers, paragraph s of

subsection 3 of that section permits an exemption if the retailer is a member of a body approved by the Minister.

By joining Repak, retailers are discharged of their obligation to self comply with regulations by accepting back excess packaging. Repak was established jointly by industry and the Department of Environment and Local Government as a way of allowing companies to avoid self-compliance.

The fees for Repak membership are calculated on the basis of the quantity and sort of waste produced. These fees have been more or less stagnant since 2000 and as a result it is proposed to increase fees by 19% for 2005. A review of Repak needs to take place to evaluate its impact and to ensure it is reaching it's full potential in the reduction of waste in industry.

Recommendations:

- **Distribution of free pre-sort bins to householders.**
- **Distribute compost bins to householders.**
- **Breakdown of waste currently provided for collection in green bins.**
- **Investigate the possibility of switching to co-collection.**
- **Enforcement through incentives, warnings and fines.**
- **Central government must intervene to create markets for recyclables.**
- **Review of Repak.**

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Service charges & the polluter pays principal

Sinn Féin firmly believes that waste services are a core service that must be provided by the state through local authorities and paid for through the central taxation system. The current situation where by residents are forced to pay Service Charges for waste collection is unworkable as well as unjust. If Service Charges were to be part of a polluter pays system they could only make sense once an infrastructure is put in place which enables the householder to divert the maximum possible waste from the residual waste collection. In the absence of proper regulations and infrastructure to enable reduction, reuse and recycling householders do not have the ability to divert waste from the residual waste stream. It goes without saying that pay by weight, being introduced in January 2005, cannot apply to the residual waste collection without this infrastructure and should not be seen from a finance raising perspective. But unfortunately, the focus in City Council has moved away from Service Charges being part of a waste strategy towards simply being a funding mechanism to pay for waste collection.

Unsurprisingly cash-strapped local authorities have viewed the 'polluter pays' principal as a handy, but necessary, finance raising instrument. There is widespread misunderstanding or misinterpretation of the meaning of the 'polluter pays' principle. Its purpose is not to meet the cost of dealing with waste but rather to act as a prevention mechanism against unnecessary waste production and to encourage conservation of resources, that is why it should only be introduced in a pay by weight system for residual waste once the above mentioned infrastructure is put in place.

In terms of the implementation of the polluter pays principal Sinn Féin believes that this needs to be primarily targeted at the producers of waste such as manufactures who produce non- recyclable non biodegradable goods, excess packaging, are involved in the wasteful use of resources and are responsible for damaging emissions.

While we do not accept service charges, we believe that in light of the refusal of central government and the Dublin Councils to abandon the current inequitable charges the plight of low-income families needs to be addressed as a matter of urgency. Service Charges, as they currently stand, are an added burden on families already facing financial hardship.

We are proposing free tag allocation or credits to low income households based on size, composition and income of households to address the fact that the current waste charges make low income households relatively worse off than high-income households. A similar compensation scheme has been proposed by the ESRI and others as a method of compensating low income householders if carbon tax is introduced. We refer the Dublin Waste Strategy Co-ordination Group to 'Carbon Taxes: Which Households Gain or Lose' prepared for the Environmental Protection Agency by the ESRI (authors Sue Scott and John Eskins).

Recommendations

- **Service charges not to be used as fundraising mechanism.**
- **Implementation of 'polluter pays' principal within industry.**
- **Situation of low income families must be addressed in line with NGOs research.**

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Conclusion

In conclusion, Sinn Féin hope that in the reviewing of the Waste Management Plan for the Dublin region the public will now see a real attempt made to address the current waste management crisis at source.

We cannot burn or bury the problem, in fact not only is it impossible to do so it is impractical to do so. The arguments in this document show this to be true. The future must be one of a sustainable waste management strategy that is based on the logic of reduction, reusing and recycling. It makes sense environmentally, socially and economically.

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