



**Draft Ireland 2040 Our Plan National Planning Framework
Public Consultation - Repak Submission**

Date: 9th November 2017

Submission by:

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Introduction

Repak is a not for profit company set up by Irish business and operated under licence from the Department of Communication, Climate Action and Environment. In twenty years Repak has invested €400 million in the recycling and recovery of 10 million tonnes of waste packaging. This investment has supported the development of nine material recovery facilities, 1,848 Civic Amenity and Bottles Bank sites¹, and the provision of a mixed dry recycling bins to nearly every household in the country availing of kerbside collection service and ongoing operational finance to support this infrastructure. The impact of this is that Repak as a producer responsibility initiative has helped in the diversion of waste from landfills from one hundred and twenty six in 1997² to four today³. Since Repak was established in 1997 packaging recycling in Ireland has grown from a very low base to the point where Ireland is now one of the leading waste packaging recycling countries in the European Union (EU). All this success was driven by strong EU and domestic environmental waste policy and active stakeholder participation towards achieving objectives. Repak has also supported 5,000 direct employees in the Irish waste management industry and 10,000 indirectly⁴.

Repak as an organisation is concerned that the DRAFT *Ireland 2040 Our Plan National Planning Framework* takes no account of waste infrastructure and capacity needs of the Circular Economy Package and of the socio economic development requirements of the next 25 years.

One of the stated principle elements of the Strategy is “Integrating the Environment into Planning for the Future. Ireland 2040 – The Draft Plan addresses many of the future development direction of our cities, towns and rural areas dealing practical ways long-term planning can enhance where we live, where we work, how we move around, our quality of life and prosperity and our environment.

This is all in the context that by 2040 there will be:-

- 1 million more people
- 660,000 more Jobs

¹ Repak 2017 survey of Bring Bank Infrastructure

² National Waste Report 1998

³ 2016 Annual Environmental Reports and telephone survey

⁴ 2015 and 2016 Repak Contractors Questionnaire Survey

- 550,000 more homes required.

The environment impact of this future growth is covered by only three of the seventy National Policy Objectives.

National Policy Objective No. 53 – Shared responsibility of Environment

National Policy Objective No. 60 – Water Resources

National Policy Objective No. 61- Air Quality

Repak recommends that a further National Policy Objective needs to incorporate the critical waste management infrastructure needs to deliver the stated strategic objective.

The Need

The Planning Strategy paper has overlooked waste management planning infrastructure needs to meet the forecasted population growth and new European Union member state obligations as part of the Circular Economy Package and Plastic Strategy post 2020 . We currently have a waste management infrastructure deficit.

Today our waste management infrastructural capacity is:-

- 4 Operation landfills
- 2 Municipal Solid Waste Incinerators with energy recovery
- 1,848 Public amenity waste facilities (Civic amenity & Bottle Bank sites)
- 9 Material Recycling Facilities Operational⁵
- Up to 1 million tonnes exported for recycling and waste management⁶
- 2,000 tonnes approx.⁷ of waste plastic packaging recycling domestic capacity in the context of c.300,000 tonnes forecast to be generated

⁵ Repak Contractor Questionnaire 2015 and 2016

⁶ 2016 Trans Frontier Shipment Office exports data tables

⁷ 2016 Repak funded plastic recycling tonnage audit trail information

Capacity Risks.

1. By 2040 Ireland will be generating at least an additional 450,000 tonnes of household and commercial municipal solid waste (MSW);
2. 2 of the 4 current operational landfills have a limited operational lifetime remaining of less than 2 years. The other two landfills have up to 10 years licensed remaining capacity;
3. Only limited domestic thermal waste treatment capacity available, there is no excess treatment capacity;
4. Export of waste for thermal treatment in the European Union is under threat as EU capacity diminishes and treatment demand increases due to continued Member State success in “diversion from landfill”;
5. Public amenity waste facilities in terms of population ratio density is c. 1:2435 this is way above the European norm of 1:1000;
6. Presently the nine Material Recycling Facilities have no excess processing capacity for plastics and about 19% for other waste packaging materials;
7. Ireland is heavily dependent on the export of materials for recycling (Some 90% exported). We are heavily reliant in the main on China as a major global market for use of recycle commodities;
8. Planning permission for new waste management facilities takes a very long time to deliver (e.g. 15 years for MSW incinerator at Duleek, Co. Meath, 20 years for Poolbeg, Co. Dublin, etc.).

Recommendation:

With Ireland’s existing waste management infrastructure capacity struggling to meet current needs, let alone what will be required by 2040 with aforementioned growth, Repak is recommending that an additional National Policy Object be set that ‘Develops the waste infrastructure needs to protect our quality of life and our environment’.