

3 CONSULTATION

3.1 INTRODUCTION

Public consultation forms a fundamental part of the waste planning process. In order to comply with the statutory requirements for consultation for the review of the waste management plan the Local Authorities must comply with Section 23 of the Waste Management Act. In theory this provides an opportunity for all stakeholders in the Region to raise issues, however in reality the statutory periods often result in a limited number of submissions, which usually come from similar sectors/stakeholders. These inputs are valid and must be given due consideration in the review of the Plan. However to ensure that feedback is more reflective of all sectors within the Limerick/Clare/Kerry Region consultation was proactively sought from all stakeholders, using a number of methods.

3.2 PRE-DRAFT CONSULTATION PROCESS

The inhabitants of Limerick City and County, County Clare and County Kerry were consulted in order to obtain their views on how waste management should be planned and implemented in the Region. This was done in a four-phase approach:

- Newspaper advertisement calling for written public submissions
- Consultation days for the waste industry held in Limerick and Kerry
- Local Consultation Forums in each of the counties
- 'Layman's' guide information leaflet distributed to the public and specific Regional stakeholders with feedback form.

3.2.1 Public Submissions

A newspaper advertisement was placed in the Irish Independent with a response deadline of August 31, 2004. This resulted in 26 submissions, 14 were from organisations (political, community, NGO), 7 were from

individuals and 5 were from the waste management industry.

3.2.2 Consultation with Waste Industry

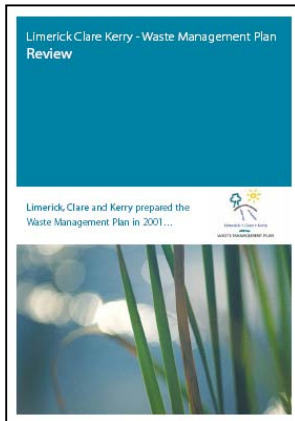
Whilst many of the waste contractors operate on a national basis, the opportunities, barriers and situations vary from region to region. All service providers (waste collection permit holders and permitted waste management facilities) were invited to discuss issues and concerns regarding the Plan. Nine service providers attended, representing waste collectors/disposal companies, recycling operators, End of Life Vehicle Facility Operators and Transfer Station Operators. Separate meetings were held with the Irish Waste Management Association and REPAK.

3.2.3 Local Consultation Forums

Local consultation forums were held in each Local Authority area. The purpose of the forums was to allow the general public have a say in the shaping of the review of the Regional Waste Management Plan. The forums were promoted through the press and radio, and letters were posted by the Local Authorities to relevant stakeholders and their networks, inviting interested parties to attend the Council Buildings in each of the four participating areas. Staff from the environment section of each Council, and the consultation team, were available to discuss issues relating to the Waste Management Plan review. The forums were very successful with a total of 135 attendants, representing organisations, business and individuals.



3.2.4 Layman's Guide



This colour A5 guide (Appendix A) outlined the process involved in reviewing the Limerick/Clare/Kerry Waste Management Plan. It outlined the targets that were set in the first Plan and the progress that has been achieved to date. A total of 4,000 guides were distributed throughout the Region by the Local Authorities to libraries, manned Recycling Centres and key stakeholders. The back page invited comments and feedback on all aspects of the Waste Management Plan review.

3.2.5 Key Issues Raised

The variety of consultation methods used in the review process gave individuals, businesses, community and industry an opportunity to comment on the 2001 Plan and to play a role in how the new Plan would be shaped and implemented. While not overwhelming in terms of the number of participants for each consultation method, the submissions, meetings, open days and layman's guide provided constructive criticism and numerous ideas and initiatives worthy of inclusion in this Waste Management Plan. The issues that were common to all groups were:

- Planning/Permit Process
- Enforcement
- Prevention/Awareness
- Extended Producer Responsibility
- Infrastructure/Facilities
- Inter-regional Movement of Waste.

Permitting System

This was highlighted as one of the main areas of concern during the consultation process with the private waste sector. Common themes were:

- Lack of consistency in issuing waste permits across the Region
- Discrepancies are apparent from Local Authorities within the same Region and the information provided on permitting varies from each Local Authority
- The waste permits need to be streamlined, they are generally too complicated and there are too many conditions relative to the scale of the facility
- Several service providers are keen to provide infrastructure, but believe the authorisation process (Planning, & Permit or Licence) needs to be streamlined and provide for quicker turn-around times to not increase the cost of overall project
- Need for a centralised waste collection permit system to be introduced to assist operators who are collecting waste across all regions.

Enforcement

In general while improvements and achievements were acknowledged, the waste industry still feels far more needs to be done to ensure there is a level playing field and that regulations are properly implemented. Enforcement is a common issue in several areas:

- Lack of enforcement and consistency of enforcement across the Region in all areas -packaging regulations, waste collection permits, illegal dumping, etc.
- Enforcement of illegal dumping, in particular around bring banks, needs to be increased
- Waste collectors are operating in the Region without a permit and the Local Authorities are not issuing fines
- Enforcement at permitted facilities is required to ensure only the permitted materials are accepted
- Enforcement of the collection permits is required to ensure that only permitted collectors are collecting waste. Otherwise 'cowboy' operators will undermine the bona-fide operators

- For End of Life Vehicle (ELV) facilities, the standards are not always upheld and more enforcement needed.

Prevention/Awareness

Engagement with the business, community, commercial and industrial sectors is seen as crucial to developing greater rates of waste prevention and minimisation. Several submissions note that the Local Authority Environment Awareness Officers are a valuable resource and their role should be expanded to assist the enterprise sector particularly the SME's. The submissions noted that since the adoption of the 2001 Plan there has not been enough promotion, education or infrastructure put in place to emphasis higher up the EU hierarchy especially in the Reduce and Reuse areas. To date with the exception of the plastic bag levy, waste reduction has remained a voluntary choice where neither penalties nor levies apply for failure to address over-consumption, over-packaging and wastage. The main suggestions put forward to increase prevention and awareness were:

- A hard hitting campaign on the reality of the effects of our waste generation should be implemented
- Waste Collectors should be given funding to carry out awareness and public education
- The education focus must change from awareness raising to the practicalities of implementing the waste management strategies laid out in the Plan.

Extended Producer Responsibility

Many comments were made regarding the role of manufacturers in reducing the amount of packaging waste householders have to dispose of, and now pay more for (Pay-by-Use). It is thought that more pressure needs to be applied to the manufacturing sector in several areas:

- Manufacturers need to be educated and made aware of the options for the redesign of packaging in terms of its recyclability and to reduce the quantity of packaging used for each product
- Take Back Policy - the public should be able to return all packaging direct to the manufacturer

- Levies and or taxes should be introduced on products that have excess packaging and non-recyclable packaging.

Infrastructure/Facilities

Concern was expressed with the lack of infrastructure in the Region, in particular; bottle banks, Recycling Centre sites, WEEE facilities, composting centres and/or systems and bulky waste collections. They felt that the number of these facilities/systems needs to be addressed in the plan. It was also stated that the range of materials accepted at each site needs to be increased and promoted. The submissions also suggest that several of the current sites are not appropriate and have put forth suggestions to reduce this problem:

- Establish more central collection points
- Recycling Centres should be more accessible for those on foot and the elderly
- Need increased maintenance of recycling facilities
- Bring Banks need to be emptied more regularly to avoid illegal dumping.

Biological Treatment Capacity

- Some concerns expressed about household 3-bin system, collection and facilities have some problems in other countries. Mixed collection possible with use of 'product' as landfill cover. A wet bin/dry bin system could work successfully.

Thermal Treatment

- Potential obstacles/barriers to WTE need to be addressed. There should be no landfill tax on landfilling of bottom ash
- Green Subsidies need to be confirmed/ guaranteed for electricity produced by WTE, since it is preferable to fossil fuels – more certainty needed.

C&D Waste

- On a smaller scale the provision of skips on C&D sites for source separation will not happen until there is an economic advantage in doing so
- Option to use quarries/ former quarries as C/D recycling locations should be explored.

Recycling

- Planning process for siting of bring banks is too restrictive (i.e. max of 5 containers) and is hampering recycling opportunities, for the public
- There needs to be a consistency in the appearance of bring banks to increase awareness.

Each Local Authority agreed to run a minimum of three Information Days in each Local Authority area and a total of 22 information days were held.

A draft of the Plan was also submitted to statutory consultees as prescribed in Section 23 (1) of the Waste Management Acts 1996-2005.

Inter-Regional Movement of Waste

- Need for a Regional framework and for the Waste Management Plans to provide an opportunity to lay some guidance
- The inter-regional issue is being used as a tool to obstruct planning permission
- No problem with a facility serving a region but should not be used to preclude other regions
- Be careful not to preclude private sector investment
- Scale of new centralised facilities should reflect the capacity needs of the Region.

In total 216 written submissions were received from the public and 34 from other organisations and the private waste management sector.

Summary

The consultation process prior to writing the draft plan was comprehensive and effective in ensuring feedback was received from all sectors within the Limerick/Clare/Kerry Region..

3.3 POST-DRAFT CONSULTATION

Following the launch of the Draft Replacement Waste Management Plan on 3rd of October 2005 an invitation for written submissions was advertised in both national and local newspapers. The full-page advertisement also appeared in free newspapers in the Region. A second round of adverts was published on 21st November 2005. In February 2006 further notices were placed in national and local press to ensure that all prescribed persons were properly consulted. In addition radio advertisements were broadcast during October, November and December 2005.

The Draft Replacement Waste Management Plan was available on the Regional Waste Management Website www.managewaste.ie.