

PROPOSAL

**Proposals for Change to Advance the Re-use,
Recycling and Recovery of Construction Materials**
Irish Plant Contractors Association (IPCA)



February 2022



INTRODUCTION

The Irish Plant Contractors Association's (**IPCA**) is a proactive organisation of Irish contractors, sub-contractors, quarrying, equipment owners and plant hire companies with a mission that commits to providing sustainable construction methods and waste management practices to the highest standards.

The IPCA's main purpose in this proposal is to set out the role members of this association can contribute to advancing the prevention, re-use, and recovery of materials generated by the Construction Industry in Ireland and to identify the barriers to achieving the commitments set out in Ireland's waste policy document, '*A Waste Action Plan for a Circular Economy*' issued in September 2020 which promotes actively moving towards waste prevention, recovery, recycling and re-use.

Ireland's Circular Economy Bill¹ was also approved in 2021 and is set to implement many of the actions in the Government's Waste Action Plan for a Circular Economy and the forthcoming Circular Economy Strategy and will put that strategy on a statutory footing. The key focus areas identified the Waste Action Plan with respect to Construction and Demolition waste are:

- Reducing the use of virgin resources;
- Keeping materials in the economy as long as possible;
- Maintaining their intrinsic value/quality as high as possible; and
- Reducing hazardous substances in products and waste.

The IPCA members are the key parties that are largely directly responsible for managing construction and demolition (C&D) materials as they arise from construction and demolition projects as either resource or wastes in accordance with national and EU waste legislation. The IPCA members and the construction industry are pivotal to Ireland achieving the commitments set out *in the Waste Action Plan for a Circular Economy*. The IPCA are committed to this plan and without the following actions from government to support the IPCA members and the construction industry, Ireland cannot achieve the commitments set out on paper without being implementable at ground level.

The IPCA call for:

- **I** Incentivisation and Investment for its members
- **P** Promotion of innovation and new technology
- **C** Commitment from government, Collaboration and Consultation with the IPCA
- **A** Acceleration of functional regulatory mechanisms to manage resources and Access to support

C&D WASTE STATISTICS

Traditionally Ireland's waste management behaviour has been linear with disposal being the main waste management option utilised. Ireland has committed to transitioning from a linear waste economy to a circular economy and Ireland's National Waste Policy and objectives were set out in '*A Waste Action Plan for a Circular Economy*' which actively promotes moving towards waste prevention, recovery, recycling and re-use.

Waste from Construction and Demolition (C&D) activity is the largest waste stream in the EU and represents one third of all waste produced within the EU. The *Construction & Demolition Waste - Soil and Stone Recovery*

¹ <https://www.gov.ie/en/publication/89838-circular-economy-bill-2021/>

/ *Disposal Capacity Report 2020* reports that the quantity of C&D Waste managed nationally has shown an increasing trend in the period 2012 to 2018, with 6.2 million tonnes of C&D Waste managed in 2018. The current growth trend is expected to continue over the medium to long term in line with planned delivery of housing and infrastructure projects described in Project Ireland 2040. Construction and demolition arisings are projected to be in the range of **8.5M - 10M** tonnes per annum by 2029.

What does Ireland need to do?

Ireland has an opportunity to manage these materials responsibly as resources rather than wastes through real commitment to the key focus areas set out in the Waste Action Plan, principally through reducing the use of virgin resources and keeping materials in the economy as long as possible. This can be achieved by the IPCA members through innovation, use of best available technology and cutting edge plant and machinery. Such proposals include wider inclusion of engineering poor quality materials to produce an excellent product through ground improvement and stabilisation techniques and investment in top class plant and equipment to recover and recycle natural aggregates from soil and stone and recycling of other C&D ‘wastes’ preserving natural resources. The proper management of C&D waste and resources supports the principles of sustainable development whilst meeting the objectives of the Waste Framework Directive and Irelands Circular Economy Bill.

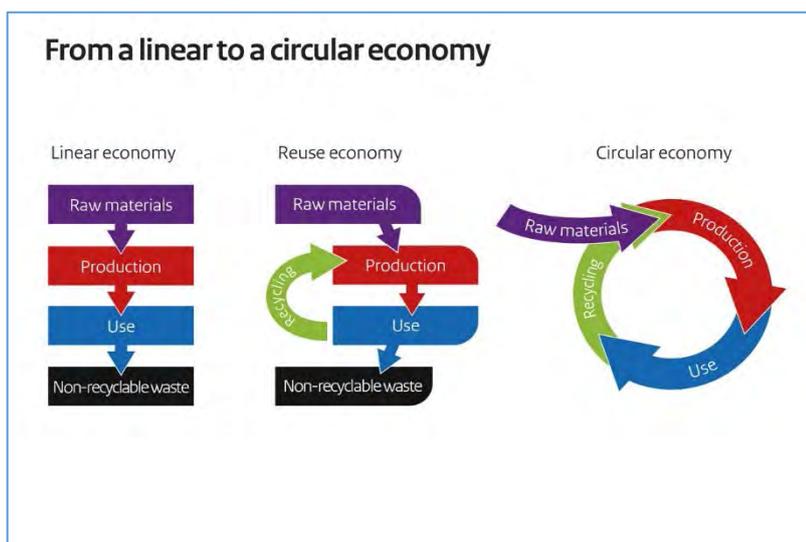


Figure 1: Infographic on linear model versus circular economy model

What is the issue with achieving circularity?

The main barriers perceived by the IPCA in the prevention, re-use, and recovery of materials generated by the Construction Industry is as follows:

- Lack of clear, unambiguous mechanisms and systems for re-use, recycling and recovery of C&D materials at industry ground level;
- Lack of confidence in the existing regulatory systems;
- Lack of coherent, coordinated application and enforcement of national legislation mainly at local authority level particularly in the context of managing C&D waste in a legally compliant way and demonstrating fitness for purpose in recycled material application;

- The main risk factor lies around the security of approval from the regulator within a timely manner that is compatible with project programme;
- Lack of technical competency at local authority level, ‘enforcers’ rather than ‘partners’;
- Fear of enforcement prevents appropriate re-use and recycling maintaining a traditional linear waste management system;
- Lack of emphasis (from all stakeholders) on C&D waste management, compared to other waste streams such as household waste;
- Lack of education, support and advice at industry level on best practice waste management;
- Lack of trust across between policy makers, enforcement authorities and industry;
- Costs of recycling are higher than landfill/disposal costs, where low or no landfill taxes apply when materials are used for ‘recovery’ at landfill;
- The lack of a compelling business case (or grant funding) for the private (or public sector) to establish recycling/recovery facilities or to invest in mobile recycling equipment;
- Proximity and spread of suitable recycling facilities in relation to sites where waste is being generated and cost of transport;
- No industry wide end of waste criteria established for recycling of C&D waste streams;
- Inadequate at-source segregation and material traceability.

Other barriers include

- Lack of site waste management planning.
- Logistics, space, cost, and regulation constraints in relation to small quantities of recyclable waste
- Recycling targets by weight promotes the recycling of heavy materials and reduces the emphasis on lighter weight material.

Recent Guidance

The EPA issued ‘*Best Practice Guidelines For The Preparation Of Resource Management Plans For Construction & Demolition Projects*’ in November 2021 distribution and use amongst the industry. The guidelines provide a practical and informed mechanism to **document** the prevention and management of C&D wastes and resources from design to construction or demolition of a project. The guidelines were prepared to provide clients, developers, designers, practitioners, contractors, sub-contractors and competent authorities with a unified approach to preparing and determining Resource and Waste Management Plans (RWMP’s) for the construction and demolition sector in Ireland.

This guidance states that waste prevention, reuse and recycling are to be incorporated into the plan however the existing regulatory mechanisms and enforcement behaviour are preventing the industry achieving the objectives required to be included the RWMP for prevention, re-use and recycling.

While waste management policy and guidelines in Ireland have evolved towards “an increased emphasis on waste prevention, in line with the waste hierarchy, through established principles such as designing out waste and the use of green procurement” (EPA, 2021), current regulatory, operational and economic processes equally need to evolve to enable and support all stakeholders to achieve higher-order waste management options presented in the Waste Framework Hierarchy below in Figure 2 below.

Figure 2: Waste Framework Hierarchy



PROPOSALS FOR CHANGE

IPCA members are directly responsible for managing waste and resource arisings at source and are directly impacted by changes in policy and legislation. The industry cannot meet the objectives and commitments set down in policy without a robust functioning regulatory waste management system that is readily understood and implemented across the industry within a defined timeframe.

The IPCA wish to be included in a common working group or platform to be in a position to engage and collaborate with all relevant stakeholders such as the Department for Environment, Climate and Communication (DECC), EPA, Local Authorities, NSAI, trade organisations, developers and other contractors. This working platform is proposed to be in a position to communicate the problems with implementation of national policy and guidance and find solutions to managing C&D resources and waste effectively with the use of the latest best available technology and equipment in order to help with the issues outlined within this report.

The IPCA, construction industry, government and regulators need to collectively capture opportunities for the practical implementation of solutions to waste prevention, reuse and recycling for C&D waste, particularly with respect to soil and stone, concrete and asphalt which are represent a significant volume of all C&D arisings to be treated as waste or resources.

The objectives of the IPCA accord with that of the latest EU and national waste management policies. The difficulty lies in the ease of compliance with regulatory mechanisms in achieving these shared objectives. The IPCA have Identified opportunities for minimising barriers and driving change which include:

- Lessening the risks perceived by stakeholders to project timelines and cost through robust and timely regulatory approvals;
- Follow on guidance needs to be prepared for the industry members such as those the IPCA represent on how to practically implement the RWMP's appropriately within the existing regulatory systems for managing waste and resources without risk of enforcement at Local Authority level;
- Progressing mandatory recycling targets for the construction industry to drive system change subject to robust regulatory mechanisms in place to do so;
- Investment in strategically located recycling infrastructure hubs to increase the availability of suitable facilities to recycle waste within a reasonable proximity of the location it is produced at and therefore reducing transport costs;

- Collaborating on a long-term, over-arching strategy focusing on the entire lifecycle of C&D materials to make recycling the easiest and most economical waste management option for industry and also the most environmentally sustainable, e.g., a significant cost for construction is the disposal of excavated clay offsite and subsequent importation of aggregates onto site.

Additional key recommendations are focused on.

- Increase fines and enforcement for illegal waste disposal (fly tipping). Ringfence landfill taxes to support the policing and enforcement of illegal waste operators;
- A tax on natural virgin material going to landfill could serve to deter this practice in place of more sustainable options;
- Guidance for products such as recycled aggregate & concrete are needed to change the mindset of disposing what is otherwise a viable product as a waste to landfill;
- Potential introduction of a mandatory % content of recycled resources in new products
- Introduction of grants for circular economy research into reducing and reusing C&D waste and promotion of these grants at IPCA and contractor level.

Many of these proposals may be under consideration at policy making level however, those at industry operational level need to be consulted to identify possible difficulties in implementation of these proposals on the ground.

IPCA CLOSING STATEMENT

IPCA members are heavily invested in making change through financial investment in new technology and practices. The IPCA also want to drive change in how the nation views the construction industry as the construction industry is often portrayed as having a negative effect on the environment. The IPCA and construction industry want to take the opportunity to implement sustainable development and waste management practices and requires the government to assist them in driving change by providing robust mechanisms to achieve this at ground level within an acceptable timeframe.

Signature Page

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