


**APPENDIX B**  
**ANALYSIS OF STATUTORY CONSULTATION REPSONSES**

PRINTED ON RECYCLED PAPER

**DONEGAL COUNTY COUNCIL**  
**THE DRAFT REPLACEMENT WASTE MANAGEMENT PLAN**  
**JULY 2006**  
**ANALYSIS OF STATUTORY CONSULTATION RESPONSES**

**DOCUMENT CONTROL SHEET**

<b>Prepared by:</b>	D Nesbitt
<b>Office of Origin:</b>	Letterkenny
<b>Checked by:</b>	D Doyle
<b>Office of Origin:</b>	Letterkenny
<b>Report Ref:</b>	BL568610/Reports
<b>Status:</b>	Final
<b>Revision No:</b>	*
<b>Date of Release:</b>	July 2006
<b>Approved and authorised for issue:</b>  <b>Name Donal Doyle</b> <b>Position Technical Director</b>	

## **CONTENTS**

- 1.0 INTRODUCTION**
- 2.0 THE CONSULTATION PROCESS**
- 3.0 OVERVIEW OF REPSONSES**
- 4.0 ANALYSIS OF THE CONSULTATION RESPONSES**
- 5.0 CONCLUSIONS**

## 1.0 INTRODUCTION

Following the statutory public consultation, the draft plan for Donegal County Council has been finalised. The main purpose of the plan is to set out the main requirements necessary for the County to meet their statutory obligations.

This report provides a summary and analysis of the written responses received to the consultation process for the draft replacement Waste Management Plan (2006) for Donegal County Council. The report is structured as follows:

- The consultation process
- Analysis of responses
- Conclusions

## 2.0 THE CONSULTATION PROCESS

The consultation process commenced on 12<sup>th</sup> May 2006 and closed on 14<sup>th</sup> July 2006. Publicity included publication of the Draft Replacement Plan on the Donegal County Council website, advertisement in newspapers and the display of the Plan at the following locations:

- Donegal County Council Environment Section, Three Rivers Centre, Lifford
- Public Services Centre, Neil T. Blaney Road, Letterkenny
- Public Services Centre, Main Street, Milford
- Public Services Centre, Malin Road, Carndonagh
- Public Services Centre, Gweedore Road, Dungloe
- Public Services Centre, Drumlonagher, Donegal Town

During this period, consultees were invited to submit comments, either by letter or by email, or on paper detailing the proposed modifications to the management of municipal waste within the County.

### **3.0 OVERVIEW OF RESPONSES**

A total of 4 responses were received during the consultation period. These responses were made up of the following stakeholder groups:

- National Construction and Demolition Waste Council. (NCDWC)
- Construction Industry Federation (CIF)
- Meenaboll Environmental Protection Group
- Waste Collectors

All respondents supplied comments relating to the draft replacement plan. In addition, more general comments on the consultation process and waste management issues in Donegal were received.

### **4.0 ANALYSIS ON CONSULTATION RESPONSES**

This section provides an analysis of the responses received during the consultation process. The responses have been broken down into the following main headings:

- Progress to Date
- Consultation
- Education
- Recycling
- Priority Waste
- Roles and Responsibilities
- Waste Collection
- Waste Growth Rates
- Landfill Fees
- Expenditure and Disposal Costs
- Service Provision
- Policy Developments
- Procurement
- Landfill Site Selection
- Waste Growth Targets

#### 4.1 PROGRESS TO DATE

*The Meenaboll Environmental Protection Group feel that the success claimed for the 2000 Waste Management Plans are extremely overstated.*

Section 5 of the Waste Management Plan detailed the short term, medium term and long term objectives of the 2000 Plan and factually detailed the progress made in the county on meeting these objectives.

#### 4.2 CONSULTATION

*The Meenaboll Environmental Protection Group refer to “close to non-existent” consultation and that proper consultation has not been happening to date.*

Donegal County Council recognises that public consultation is an important part of reviewing waste management planning and continues to strive to engage with the public on waste management issues. The consultation undertaken for the replacement Waste Management Plan is detailed in Section 3 of the Plan and included a statutory consultation period from 12<sup>th</sup> May until 14<sup>th</sup> July 2006.

All consultations carried out by Donegal County Council are in compliance with section 22 of the Waste Management Act 1996 and the Department of the Environment Circular WIR 06/04.

#### 4.3 EDUCATION

*The Meenaboll Environmental Protection Group have stated that “a massive hands on education programme should be run continually on composters, wormeries, and recycling in all areas of Donegal as adult education programmes, these should also be complemented by a similar programme to be run in schools.*

Greater awareness of waste management in the County has been improved through the appointment of a Waste Awareness Officer and Recycling Officer. Donegal County Council run an extensive education programme in schools throughout the County. Furthermore the Council engages with community groups, businesses, voluntary groups etc on waste education and awareness.

Detailed description on the Council’s waste education and awareness initiatives are contained in section 4 of the Plan, these include: The Green Piece, Community Talks, School Visits, and participation in An Taisce’s Green Schools Programme.

#### **4.4 RECYCLING**

*The Meenaboll Environmental Protection Group want the Council to put pressure on the National Government to establish bottle and can take-back/deposits schemes.*

Donegal County Council welcome national initiatives from the Government aimed at the management of wastes in accordance with the Waste Management Hierarchy and the Waste Plan supports this approach.

*The Council must place emphasis on removing all recyclable materials and organic waste from the residual waste chain. Recycling these materials in the County would create jobs and new indigenous enterprises.*

Donegal County Council has expanded the waste recovery and recycling infrastructure in the County over the last five years. The expansions, in the form of civic amenity sites, bring banks, permitting for the collection of mixed dry recyclables and organic wastes will lead to the further increase of recycling and recovery. Further expansions are planned in the coming years and detailed in Section 15 of the Plan.

#### **4.5 PRIORITY WASTE**

*The NCDWC and the CIF refer to Sections 7.1, 7.17, and 8.4 and comment on the amount of C&D waste generated in Donegal and suggest a figure in excess of 150,000 tonnes is an appropriate figure that should be provide for in the plan.*

This figure (150,000 tonnes) is based on an analysis of the national statistics and house building statistics in Donegal. The Waste Plan has been revised to recognise the statistical approach to C&D Waste generated in the county. However the reality on the ground suggests that such a figure would not be an accurate reflection of the situation. Demolition in Donegal is not a major element of construction, which is mainly a green - field activity in the County. The waste regulation service of the County Council's environment directorate is very active in recent times in this area and will continue to monitor and regulate this situation on an ongoing basis.

The Plan has been amended, Donegal County Council has set a target to improve the recording of C&D waste accepted at permitted facilities and improve C&D waste data collection in the County.

*The NCDWC and the CIF refer to Section 7.17 and recommend that certain C&D wastes should be recycled.*

The waste services and associated infrastructure within the County are privatised and where possible the private sector is encouraged to recycle and provide recycling facilities through the intervention of the relevant officers in the waste management service of the Council.

The Plan has been amended, Donegal County Council has set a target to promote and encourage the development of facilities for C&D waste by the private sector.

*The NCDWC and the CIF refer to Section 7.17 Table 7.14 and again refer to the need to develop C&D waste recycling infrastructure.*

The response given above applies to this matter. The waste services and associated infrastructure within the County are privatised and where possible the private sector is encouraged to recycle and provide recycling facilities through the intervention of the relevant officers in the waste management service of the Council.

The Plan has been amended, Donegal County Council has set a target to promote and encourage the development of facilities for C&D waste by the private sector.

*The NCDWC and the CIF also express a view that Local Authorities are not doing enough in the area of permit enforcement.*

Donegal County Council is actively engaged in this area in undertaking their role and responsibility in relation of Waste Permit enforcement.

The Plan has been amended, Donegal County Council has set an objective to regulate the collection and management of C&D waste to achieve the Plan objectives.

*The NCDWC and the CIF refer to Section 8.13 and the availability of Civic Amenity Sites for C&D Wastes and for small builders.*

CA Sites are for domestic use for specific waste streams only. Some wastes arising from domestic DIY activity can be accepted however commercial waste cannot be accepted.

The draft Plan has been amended, the final plan makes provision for the collection of small quantities of household C&D waste arising from DIY activities at civic amenity sites.

*The NCDWC and the CIF refer to section 12 and again urge the Council to provide infrastructure for C&D Waste.*

As stated this is seen as mainly a matter for the private sector itself to make provision for C&D waste infrastructure.

The draft Plan has been amended, Donegal County Council has set a target to promote and encourage the development of facilities for C&D waste by the private sector.

*The NCDWC and the CIF refer to Section 15.3 and comment on the use of the phrase “to encourage the registration of construction and demolition waste sites” pointing out that this is a legal requirement.*

As stated above Donegal County Council does pursue a policy of enforcement in this area. However if a policy of encouragement is employed and is responded to by those targeted by this policy, then the need to rely just on enforcement can be lessened and better understanding can be developed between the regulator and the regulated which will lead to better compliance rates overall.

*The NCDWC and the CIF refer to Section 16.6 and the date quoted as 2015 stating that 2013 is the appropriate date.*

This observation is correct and the final version of the waste management plan has been amended accordingly.

*The NCDWC and the CIF refer to Section 16.6 and an updated draft Best Practice Guidelines on the Preparation of Waste Management Plans for Construction & Demolition Projects. In particular they refer to slight changes to the threshold for Project Waste Management Plans.*

The plan takes note of ongoing changes in this drafting process and refers to the final version of this document.

*The NCDWC and the CIF refer to Section 17.5.2 and Table 17.4 and the role of Donegal County Council in promoting the provisions of facilities for C&D waste. It is recommended that the DoEHLG be requested by Donegal County Council to establish a fund for grant aiding such facilities.*

As such a request may be counter to the Polluter Pays Principle this is not deemed to be an appropriate action by Donegal County Council at this time.

*The NCDWC and the CIF recommend sites as suitable locations for recycling C&D waste.*

It should be recognised that such sites are already recognised by Donegal County Council as suitable for such purposes in its permitting policies for such activities.

#### **4.6 ROLES AND RESPONSIBILITIES**

*The Meenaboll Environmental Protection group state that “Donegal County Council needs to lead by example”.*

Donegal County Council recognises that they have a pivotal role to play in improving resource utilisation and waste management practices in the County. The implementation of the targets and objectives contained in the plan will be undertaken by the Council with the input from private sector services.

To date the Council has implemented green house keeping, environmental performance measures and developed procurement policies and practices that encourage sustainable purchasing and stimulate market development. The Council will actively implement the priorities detailed in Section 19.2 of the plan.

#### **4.7 WASTE COLLECTION**

*The Meenaboll Environmental Protection Group believe that the privatisation of the refuse collection service is not working and that less than 50% of all households in Donegal are serviced by a refuse collection round. Thought should be given to householders in rural areas of the County with the possibility of establishing a local collection point.*

Donegal County Council realise that the issue of uncollected waste must be addressed in Donegal. Section 15 of the Plan identifies as a target a research study to establish baseline data on the number of households that currently avail of a refuse collection service. This study will address why the waste is not being collected, how the materials are being disposed and specify solutions to this issue.

*The Meenaboll Environmental Protection Group state that illegal dumping of waste is a problem due to “exorbitant” waste collection/disposal costs*

Since January 2005 use related charges have been introduced to householders across the county through a volume based system. The development of direct user charges was founded in the Government policy document “preventing and Recycling Waste: Delivering Change, 2002” and aims to act as an incentive householders to reduce, reuse and recycle.

#### **4.8 LANDFILL FEES**

*The Waste Contractors feel that there should be no decrease in landfill gate fee unless wood and organic waste are banned in order to ensure that recycling is promoted and financially viable.*

Landfill fees reflect the cost of the provision of waste management services and the current overall circumstances in the waste disposal market. While taking cognisance of the issue of diverting wood and organics from the landfill as part of the overall diversion of biodegradables the question of landfill fees require a wider perspective than this specific area.

#### **4.9 EXPENDITURE**

*The Meenaboll Environmental Protection Group are concerned that the projected recycling expenditure and education and awareness expenditure is to remain constant from 2006 to 2010.*

Donegal County Council are aware that the cost associated with this activity has remained at the same level throughout the life of the plan. Additional support from Central Government to allow an increase in the funding of these activities would be welcomed by Donegal County Council.

#### **4.10 SERVICE PROVISION**

*The NCDWC and the CIF refer to the need for identifying the facilities required to recycle the various C&D waste streams and to encourage such developments. They then again suggest the use of bring centres for C&D wastes.*

These matters have been referred and responded to in Section 4.4 above.

#### **4.11 POLICY DEVELOPMENTS**

*The Waste Contractors stated that Donegal County Council should be policing current local and national policies regarding proper waste disposal and treatment.*

Donegal County Council monitors policy developments in the waste management area both through its own resources and also through the use of external sources.

#### **4.12 PROCUREMENT**

*The Waste Collectors stated that Local Authorities must have an obligation as a public sector buyer to actively pursue the purchasing of recycled products and should be taking a pro-active approach to this.*

Donegal County Council has pursued a procurement policy relating to recycled goods. However the Procurement Directive lays down specific regulations in relation to purchasing materials which must be adhered to by all Local Authorities. This can at times inhibit the purchase of certain goods including recycled items.

#### **4.13 LANDFILL SITE SELECTION**

*The Meenaboll Environmental Protection Group have called for the establishment of a group to set criteria for landfill facilities prior to the commencement of any Environmental Impact Assessment.*

Donegal County Council follows rigorous EPA guidelines on landfill site selection and best practice. The draft EPA Manual on Landfill Site Selection outlines a staged process encompassing a desk study, mapping exclusionary factors, selecting siting criteria and shortlisting generally suitable area using siting criteria. Shortlisted sites are assessed in detail before a final selection is made.

#### **4.14 Waste Growth Rates**

*The Meenaboll Environmental Protection Group have questioned why the Plan has used a waste growth rate of 1.5%.*

For the Council to make the necessary provision for infrastructure and services, the amount of waste that will have to be collected, recycled, disposed of or otherwise treated, provides a critical element for planning purposes, both in view of the costs and also the scale and type of facilities and services that they will need to provide. The national average is reported as 3.8%. However there is no indication that the growth rate in Donegal is as high as this and for the purpose of calculating waste growth a growth rate of 1.5% has been used.

## 5.0 CONCLUSIONS

This report details the consultation carried out during May to July 2006 on the Draft Replacement Waste Management Plan for 2006-2010 for Donegal County Council.

Although the responses were limited for this consultation process, respondents provided comprehensive and useful comments and suggestions regarding the future management of municipal waste within the County. The Council acknowledges the amount of time and effort taken by their authors.

All submissions have been considered and the comments taken on board. Any changes specified in this Consultation Report have been incorporated in the final Waste Management Plan to be forwarded for approval by the County Manager.