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COMMISSION STAFF WORKING DOCUMENT

The early warning report for Ireland

Accompanying the document

Report From The Commission To The European Parliament, The Council, The European Economic And Social Committee And The Committee Of The Regions

identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target

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1. Introduction

The early warning report aims to assist Member States at risk of failing to meet: (i) the 2025 target of 55% for the preparing for re-use and the recycling of their municipal waste (this target is set out in Article 11(2)(c) of Directive 2008/98/EC); and (ii) the 2025 target of 65% for the recycling of their packaging waste (this target is set out in Article 6(1)(f) of Directive 1994/62/EC). It also provides an update on how Member States are performing against the 2035 target to send no more than 10% of their municipal waste to landfill (this target is set out in Article 5(5) Directive 1999/31/EC).

This report builds on previous support provided by the Commission to help Member States comply with EU law on municipal waste management, including, where relevant, the early warning report from 2018.

The assessment underpinning the early warning report identified 18 Member States at risk of missing the 2025 preparing for re-use and recycling target for municipal waste, 10 of which are also at risk of missing the 2025 recycling target for all packaging waste.

This assessment is based on a collaborative and transparent process involving the Member States concerned, the European Environment Agency¹, and an in-depth analysis of the most recent policy developments in the Member States. This process also involved extensive consultation with the Member State authorities in charge of waste management. The possible actions identified during this process are based on existing best practices and aim to help Member States meet the 2025 targets, and as such they focus on policy measures which can be taken in the short term. These actions should be seen as complementary to those recommended in the roadmaps which were drawn up as part of preceding compliance-promotion activities and to those recommended in the Environmental Implementation Review².

2. Key findings

Based on an analysis of collected data and existing policies in the area of waste management, Ireland is considered at risk of missing the 2025 target of 55% for the preparing for re-use and the recycling of its municipal waste. Ireland is on track to meet the 2025 target to recycle 65% of all packaging waste. However, the country is at risk of not meeting the 2025 target of 50% that applies specifically to plastic packaging.

The incineration rate was 46% in 2019 – almost twice the EU average of 26%. With a landfilling rate of 15.3% in 2019, Ireland was not considered at risk of not meeting the 2035 target for municipal waste landfilling (less than 10%). It is to be noted however that according to the data for 2020, the incineration rate fell to 31.8% and the landfilling rate increased to 22.5%, which indicates the need to step up efforts to divert waste towards recycling.

Ireland's recycling rate of municipal waste decreased by slightly more than 3 percentage points between 2016 and 2018, from 40.7% to 37.6%. Despite a decrease in composting/digestion of 0.7 percentage points from 9.6% to 8.9% between 2019 and 2020, the recycling rate increased by 3 percentage points to 40.4% in 2020 and is therefore slightly below the 2016 rate.

¹ EEA and ETC/CE (2022). Early Warning Assessment Related to the 2025 Targets for Municipal and Packaging Waste (<https://www.eea.europa.eu/publications/country-profiles-early-warning-assessments>)

² European Commission (2022). Environmental Implementation Review 2022. COM/2022/438 final. (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=comnat%3ACOM_2022_0438_FIN)

In 2019, Ireland's recycling rates were already higher than the targets for all packaging materials except plastic packaging. The recycling rate for plastic packaging waste declined by 2.2 percentage points between 2015 and 2019. With a current recycling rate of 27.5%, the distance to meeting the target for plastic packaging waste is 22.5 percentage points, even after applying the new calculation rules³. In 2020, the recycling rate for all packaging materials was 62.4%.

The main factors hindering progress of Ireland towards the targets include:

- low capture rates of recyclable waste in the separate collection system, in particular from plastic packaging;
- lack of sufficient infrastructure for the separate collection and treatment of biowaste;
- limited economic instruments to incentivise waste management associated with the higher steps of the waste hierarchy.

Firm plans are already in place for some of these issues, e.g. separate collection and treatment of biowaste and a tax on waste incineration. Additional progress is therefore expected once these measures yield results.

3. Key recommendations

Among the measures deemed necessary to support Ireland's efforts to improve its performance in waste management, three main recommendations are listed below.

1. Support preparing for re-use of municipal waste and re-use systems for packaging
2. Improve separate collection of municipal biowaste to increase capture rates, prioritising door-to-door collection and promoting high quality bio-waste to maximise potential for recovery.
3. Further develop waste treatment infrastructure associated with the higher steps of the waste hierarchy, including increasing the capacity for treating biowaste and supporting home composting.
4. Implement economic instruments, such as incineration taxes, to incentivise recycling and reduce dependency on waste incineration.

The table below lists further possible actions to support Ireland's efforts to improve its performance in waste management.

4. Good practices

The following measures implemented by Ireland are considered good practices that can contribute to better performance in recycling.

- Major role of producer responsibility organisations in awareness-raising and communication – To be authorised to operate, producer responsibility organisations must carry out national education programmes and awareness-raising activities specific to their respective waste streams. These campaigns must run across all existing and emerging media platforms, and their effectiveness is continuously monitored. The organisations are also encouraged to work together on these campaigns.
- 2022-2023 Circular economy communication campaign – A national circular economy education and awareness campaign⁴ across print, radio and social media has been launched to present the concept of circular economy to the general public. This includes presenting 'Circular Heroes', which are

³ Commission Implementing Decision (EU) 2019/1004.

⁴ [Irish Environmental Protection Agency: It's time to get circular.](#)

individuals, businesses and organisations who will illustrate the circular economy in practical terms through their own stories. The campaign is to be followed by more targeted campaigns focusing on specific demographics, material streams and economic activities.

OVERVIEW OF POSSIBLE ACTIONS TO IMPROVE PERFORMANCE

Governance

- 1) Set mandatory indicators and targets for separate waste collection to be achieved by the bodies in charge of the collection of municipal waste (e.g. municipalities) in order to monitor, enforce and achieve higher capture rates. This could be complemented with a system of financial rewards and penalties dependant on the performance of the bodies against the targets. Information on the performance of those bodies could also be made available to the general public to raise awareness (e.g. on a website).

Prevention

- 2) Take measures to increase re-use and to prevent the generation of non-recyclable municipal waste
- 3) Swiftly revise the national waste prevention programme. Foster coordination between the central and the local government on waste prevention. Properly monitor implementation of waste prevention measures and ensure sufficient budget is allocated to them.

Separate collection

- 4) Increase biowaste capture rates by focusing on door-to-door separate collection of municipal biowaste. Promote separation in a clean biowaste stream to avoid contamination and to maximise the potential value of biowaste.
- 5) To increase capture rates of plastic packaging waste from households, assess whether additional types of plastic waste can be separately collected. Soft plastics have recently been added to the separately collected stream, and this could also be possible for other types of plastic waste.

Waste treatment

- 6) Support preparing for reuse of municipal waste and develop waste-treatment infrastructure in a way that focuses on the higher steps of the waste hierarchy. Firm plans and concrete actions are needed, such as supplementing centralised biowaste treatment with decentralised composting solutions such as home composting and community composting.
- 7) Conduct a clear mapping of the current national capacity for treating biowaste and adjust it to match upcoming needs. This will ensure that with the planned increase of separate collection for biowaste, it can be adequately recycled.

Communication and awareness-raising

- 8) Maintain and reinforce awareness raising activities about waste prevention, littering and separate collection. A set of national communication materials should be developed that: (i) are addressed to the general public for use at local level; (ii) have clear and consistent messages; and (iii) have a particular focus on biowaste, separate collection and sound management of waste. These materials should be used in awareness-raising activities on social media and the internet and at civic amenity sites.

Extended producer responsibility and economic instruments

9) Implement economic instruments (e.g. incineration taxes of a sufficient magnitude or applying emissions trading schemes rules for incineration) to incentivise waste management associated with the higher steps of the waste hierarchy. This will help to make re-use, preparation for re-use and recycling economically attractive and reduce dependency on waste incineration. The economic incentive should be designed and sufficiently large to develop a 'steering effect'.

10) Implement a deposit-refund scheme for all types of PET⁵ bottles up to 3 litres in size and aluminium beverage cans.

11) Stepping up efforts to establish re-use systems for packaging will bring environmental benefits and help Member States in complying with the EU packaging recycling targets.

⁵ Polyethylene terephthalate.