



Bioeconomy Consultation,
Dept of the Taoiseach,
Government Buildings,
Merrion Street,
Dublin 2

By email: bioeconomy@taoiseach.gov.ie

15th September 2017

CEWEP Ireland response to the Public Consultation on the drafting of a National Policy Statement on the bioeconomy

CEWEP Ireland welcomes the opportunity to respond to this important consultation on the development of a National Policy Statement on the bioeconomy in Ireland.

CEWEP is the umbrella association of the owners / operators of Waste to Energy (WtE) Plants, representing approximately 400 WtE from 18 European countries. Our members make up 86% of the WtE capacity in Europe. CEWEP Ireland is the Irish branch of CEWEP Europe and has two members: Indaver, which operates the Meath WtE Facility and is proposing to develop a similar WtE Facility in Cork; and Covanta, which is currently constructing the Dublin WtE Facility. By 2020 it is anticipated that members will have a total treatment capacity of over 1,070,000 tonnes per annum residual waste and export more than 90MW electricity and/or heat.

In conjunction with the revised legislative proposals on waste contained within the European Commission's proposed Circular Economy package, the development of an over-arching framework on the bioeconomy, would not only assist Ireland in its transition to a low-carbon economy, foster sustainable economic growth and help to grow jobs but would also help to ensure that Ireland is on course to meet the binding targets laid out in the Renewable Energy, Waste Framework and Landfill Directives.

In 2012, the European Commission presented its first dedicated bioeconomy strategy "*Innovating for Sustainable Growth: A Bioeconomy for Europe*",¹ which sets out a number of primary objectives, including:

- Reducing dependence on non-renewable resources;
- Mitigating and adapting to climate change; and
- Creating jobs and maintaining competitiveness.

Since this date, a number of member states and regions have adopted their own strategies to support the sustainable and innovative use of biological resources. Given the many associated economic and environmental benefits, the Department of Agriculture, Food and the Marine, the Irish department with responsibility in relation to the Commission's Strategy,

¹ <https://publications.europa.eu/en/publication-detail/-/publication/1f0d8515-8dc0-4435-ba53-9570e47dbd51>



is to be commended for its commitment to the strategic development of Ireland's bioeconomy.

The concept of the bioeconomy addresses the production of renewable biological resources and their conversion into food, feed, biomaterials, bio-chemicals energy and fuels. Biological resources include industrial feedstock resources such as municipal solid waste (MSW) and wastewater. A clear connection between the bioeconomy and the Circular Economy may be said to exist as both seek to promote the sustainable use and management of finite resources and the reduction of harmful impacts including greenhouse gases and contain a clear focus on mitigating the increasing effects of climate change.

In light of the foregoing, CEWEP is of the view that whilst waste reduction and elimination should be prioritized as laid out in the Waste Hierarchy, unavoidable wastes (including residues remaining after treatment) that cannot be recycled in a sustainable manner, can be safely and effectively treated by the WtE process. This form of sustainable waste technology has the added benefit of producing electricity and heat whilst ensuring that such unavoidable wastes are transformed into useful and valuable resources which can thereafter contribute to a circular bio-economy.

Recovery (including energy recovery) is specifically recognized as an important component of the waste hierarchy and in Ireland's National Waste Policy Document, A Resource Opportunity (2012)² and has helped to promote self sufficiency and to drive a move away from disposal and from unsustainable and environmentally unsound practices involving the landfilling of municipal waste.

In addition, EfW has a pivotal role to play in the reduction of carbon emissions and in the meeting of mandated EU targets and to the reduction on external energy dependency. In Ireland and throughout the EU this technology has greatly assisted in the diversion of waste from landfill, thereby reducing environmentally detrimental impacts on land, air, groundwater quality and has contributed towards greenhouse gas emission reduction targets. The virtual elimination of landfill in some member states and vast reduction of landfill use in Ireland, has been achieved through a combination of recycling, composting and the WtE process.

The Eurostat, Landfill / Disposal Report (2012) makes evident this move away from dependency on landfill in the EU and the municipal waste treatment Report for the same period highlights that EU countries which have successfully moved away from a dependence on the landfilling of municipal waste have done so through this combination of measures³ including EfW technology.

Furthermore, given that China has recently notified the World Trade Organization (WTO) that it is seeking to implement a ban on the import of all scrap plastics and unsorted waste paper from the start of 1 January 2018 in an attempt to improve its environmental standards, the need for domestic treatment capacity to handle this waste stream is likely to be of critical

² https://www.epa.ie/pubs/reports/waste/plans/Resource_Opportunity2012.pdf

³ <http://appsso.eurostat.ec.europa.eu/nui/submitViewTableAction.do>



importance going forward. This ban if implemented could have a huge impact on the ability of member states and on Ireland's ability to meet EU recycling targets and is likely to pose many additional difficulties if this waste is to be handled in an environmentally sound manner and in line with the requirements of the waste hierarchy.

Thus in conclusion, given Ireland and the EU's ambition to transition to a post-fossil fuel economy and to implement current and revised legislative proposals on waste which set clear targets for the reduction of waste and common EU targets under the proposed Circular Economy Package, the establishment of a bioeconomy strategy which has obvious synergies with circular economy principles may be said to represent a natural next step in the move towards a truly low carbon and resource efficient economy.

Accordingly, EfW technology can and will continue to contribute to such a new strategy given its capability to sustainably recover unavoidable wastes and to thereafter create renewable energy which contribute to EU climate and renewable energy targets.