ZWAI
ZERO WASTE ALLIANCE IRELAND
Comhaontas Saor Ó Dramhaíl na hÉireann

# Submission by Zero Waste Alliance Ireland to the European Commission on Member States' Progress towards the 2030 Targets for Reduction and Recycling of Waste

**26 October 2026**

**Zero Waste Alliance Ireland is funded by the Department of Climate, Energy and the Environment through the Irish Environmental Network, and is a member of**

EEB European Environmental Bureau

CAN CLIMATE ACTION NETWORK Europe

IEN Irish Environmental Network

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**Appendix I** European Commission's "Call for Evidence" issued on 28 September 2026 for feedback on EU Member States progress towards achieving the 2030 and 2035 targets for waste reduction.

**Appendix II** Screenshot showing that our submission has been received by the European Commission, and email confirmation received from the European Commission showing receipt of the ZWAI submission on 26 October 2026.

# ZERO WASTE ALLIANCE IRELAND

*Towards Sustainable Resource Management*

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# Submission by Zero Waste Alliance Ireland to the European Commission on Member States' Progress towards the 2030 Targets for Reduction and Recycling of Waste

## 1. INTRODUCTION

On 28 September 2026, the European Commission issued a Call for Evidence [1] to demonstrate Member States' progress towards the 2030 targets for reduction and recycling of wastes, focusing primarily on the targets for reduction and recycling of packaging waste, on preparing municipal waste for re-use and recycling, and for reduction of food waste. The Commission is also assessing Member States' progress towards the 2035 target for minimising the landfilling of municipal waste, and identifying Member States at risk of not meeting these targets and providing them with recommendations to improve their performance.

The Waste Framework Directive,[2] the Packaging Waste Directive,[3] the more recent Packaging Waste Regulation,[4] and the Landfill Directive[5] include the

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[1] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/17712-Waste-early-warning-report-2027_en

[2] Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives. This Directive has been amended a number of times, and a consolidated version was produced by the European Commission on 16 October 2025.

[3] Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

[4] Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC.

[5] Directive (EU) 2018/850 of the European Parliament and of the Council of 30 May 2018 amending Directive 1999/31/EC on the landfill of waste.

concept of "early warning reports" (EWRs) to be drawn up by the Commission at least three years before the deadline for achieving each target.[6] The objectives of these EWRs, which are specific to municipal waste, food waste, packaging waste and landfilling, are to assess Member States' progress towards reaching the 2030 recycling targets for municipal waste and packaging waste, waste reduction targets for food and packaging waste and the 2035 landfill target. Each EWR will list those Member States which are most at risk of not attaining the targets within the respective deadlines and will make recommendations for Member States to improve their waste management performance, including by sharing best practice.

## 1.1 Early Warnings That Targets Were Being Missed

The Early Warning Report published in 2023 considered that eight Member States were at risk of missing only the municipal waste target (Estonia, Finland, France, Ireland, Latvia, Portugal, Spain and Sweden); while ten Member States (Bulgaria, Croatia, Cyprus, Greece, Hungary, Lithuania, Malta, Poland, Romania and Slovakia) were at risk of missing both the targets for municipal waste and all packaging waste targets for 2025.

The 2023 Early Warning Report stated that:

> "*Turning waste into resources is an essential building block of the circular economy. Proper implementation of the EU's waste legislation involves the application of the waste hierarchy, which gives priority to preparing for re-use and recycling and puts landfilling as the least preferred waste treatment option. The EU's targets for the treatment of municipal and packaging waste have been established in order to ensure concerted efforts in all Member States to move up the waste hierarchy.*
>
> *Improving performance in waste management will speed up the transition to a circular economy and contribute to the objectives of the circular economy action plan for a cleaner and more competitive Europe to double the EU circular material use rate, significantly reduce total waste generation and halve the amount of residual municipal waste by 2030.*
>
> *Furthermore, sound waste management is essential to prevent the negative impact of waste generation on the environment and health, and to achieve the targets of the zero pollution action plan on waste and marine litter.*

[6] 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. COM(2023) 304 final; Brussels, 8.6.2023.

*Increasing preparing for re-use and recycling and reducing landfilling are key to reaching climate neutrality, increasing the security of supply of raw materials, saving energy, and reducing EU dependencies on imports from third countries, while creating local jobs and boosting innovation in new technologies for sustainable products and materials management".*[7]

The 2023 Early Warning Report was based on an assessment carried out by the European Environment Agency in early 2022, and on an in-depth review of Member States' recycling performance and waste policies.[8] The EEA assessment is published as a briefing note dated 08 Jun 2023, and it includes some very helpful background information on Member States' performance on waste management.

For example, Figure 1 in the EEA briefing note shows municipal waste management in the EU-27, from the years 2010 to 2020, and while it is clearly shown and commendable that landfilling of waste has decreased to a moderate extent, it is disturbing to see that the amounts of waste incinerated have not reduced.

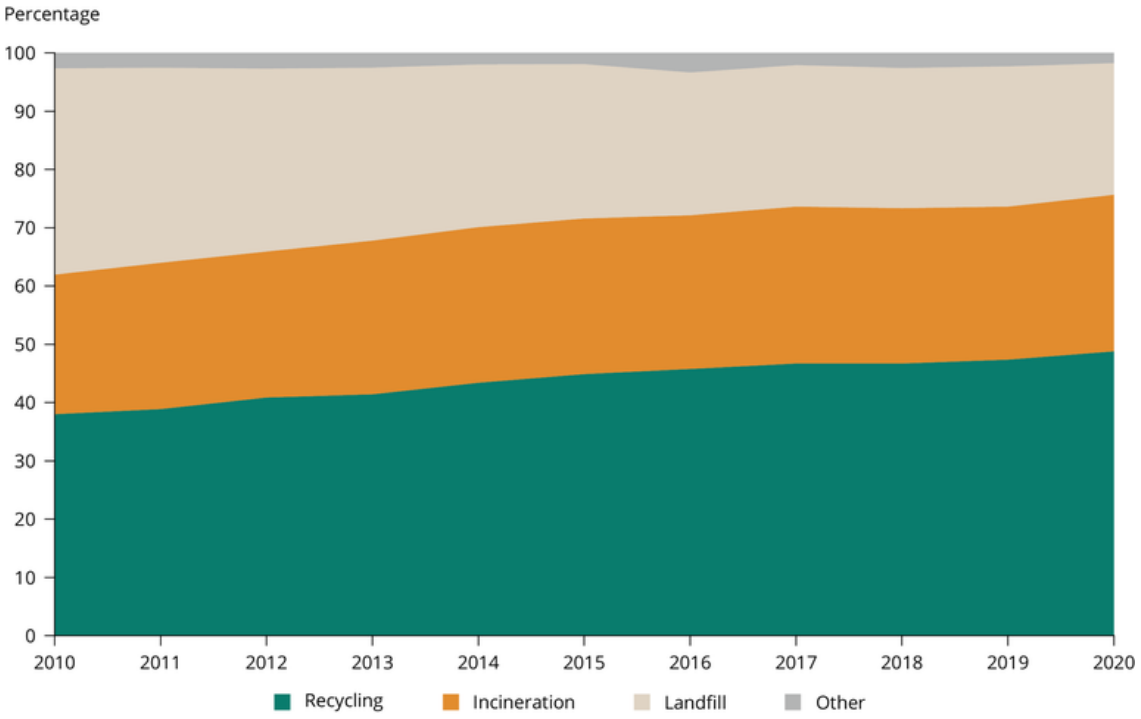



**Figure 1. Municipal waste management in the EU-27, 2010-2020. From EEA briefing note dated 08 Jun 2023.**

[7] 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. COM(2023) 304 final; Brussels, 8.6.2023. Introduction, page 1.

[8] https://www.eea.europa.eu/en/analysis/publications/many-eu-member-states

The EEA briefing note comments that "*municipal waste management in the EU has slowly improved since 2010. However, progress in recycling rates has recently slowed down".* That comment reflects our own experience, and is an indication of the difficulties which lay ahead, towards achieving the 2030 recycling target for municipal waste, and the 2035 target for bringing to an absolute minimum the landfilling of municipal waste.

Figure 2 in the EEA briefing note shows packaging waste management in the 27 Member States, from 2010 to 2020, and it indicates that recycling rates have disappointingly remained more or less unchanged, and too much packaging waste continues to be incinerated.

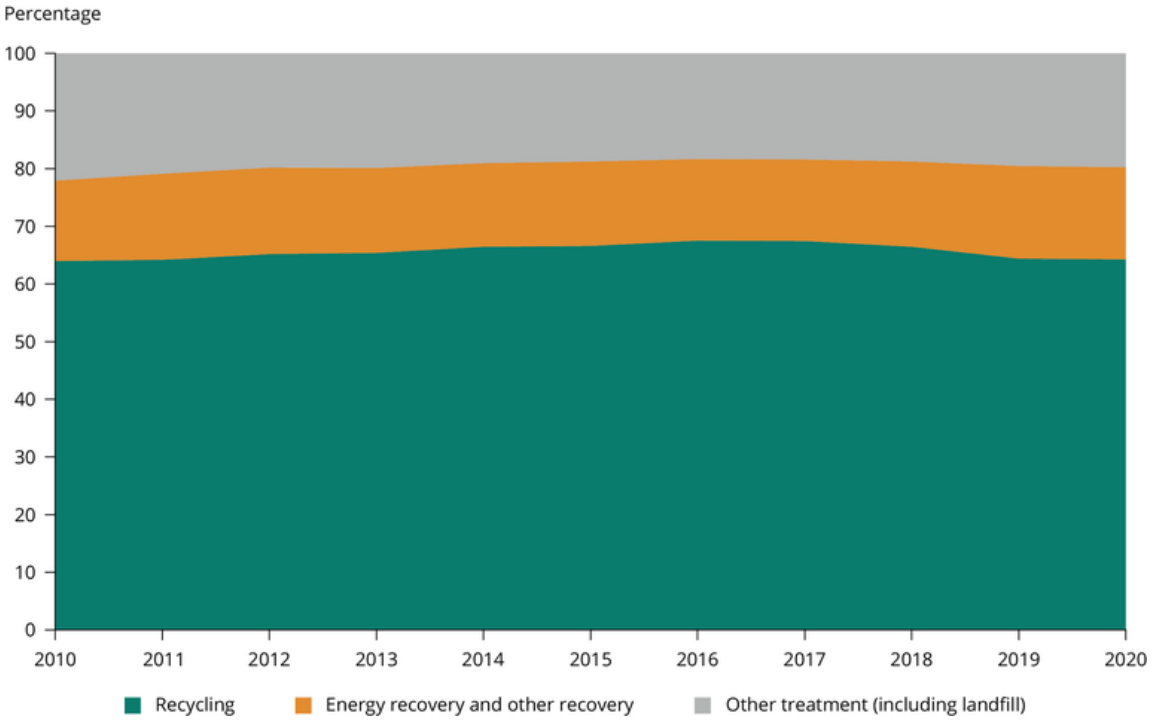



**Figure 2. Packaging waste management in the EU-27, 2010-2020. From EEA briefing note dated 08 Jun 2023.**

The EEA briefing note comments that "*Packaging waste recycling rates are higher than those for municipal waste but have barely changed over the same period. Most recently, the recycling rate for packaging waste may have actually slightly decreased, although changes in the reporting methodology countries use and the COVID-19 pandemic might be partly responsible for this".*

That comment is an indication of the difficulties which lay ahead, towards achieving the 2030 target for recycling packaging waste, an issue to which we will return in section 3 of this submission.

The relevant targets for the years 2025, 2030 and 2025 for recycling municipal waste, minimising landfilling of municipal waste, recycling packaging waste, and recycling the principal components of packaging, are shown on Figure 3 in the EEA briefing note (reproduced as our Figure 3 below).

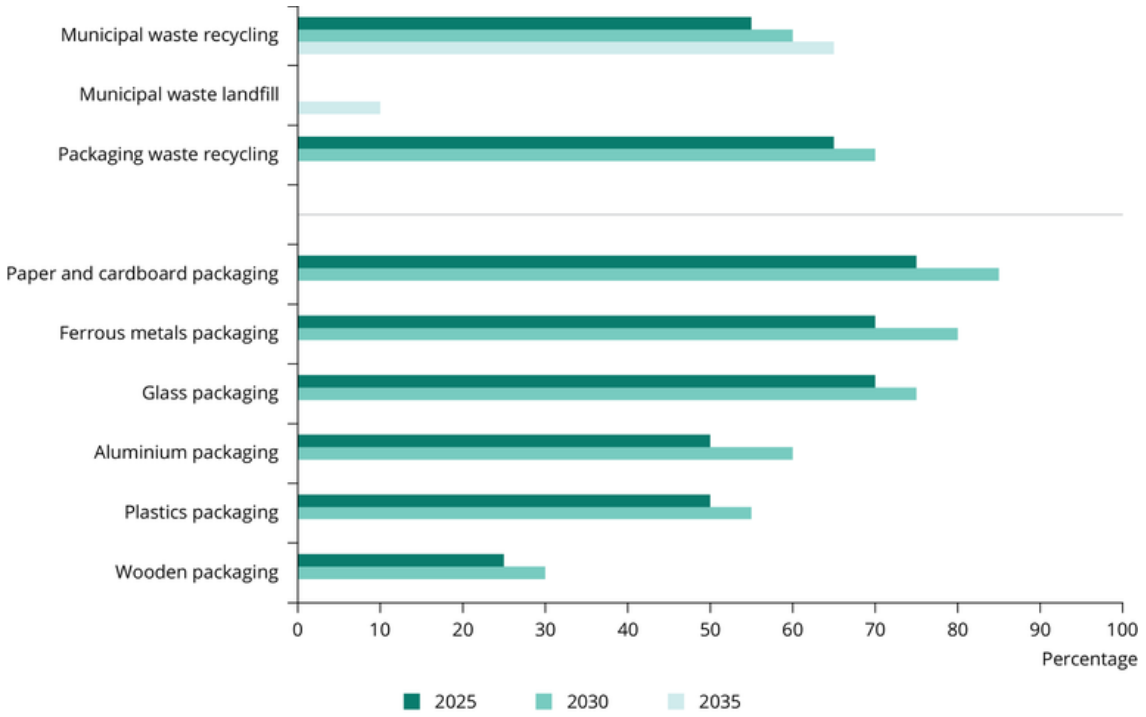



**Figure 3. Targets for municipal waste and packaging waste for 2025, 2030 and 2035, in percentage of generated waste. From EEA briefing note dated 08 Jun 2023.**

These targets are set by the Waste Framework Directive and the Packaging and Packaging Waste Directive for municipal waste and packaging waste management to be achieved by 2025, 2030 and 2035, and must be achieved by all Member States. They are more ambitious compared to the previous recycling targets for municipal waste (to be met by 2020) and for packaging waste (to be met by 2008); and, from our perspective as Zero Waste Alliance Ireland, they are an improvement, but do not go anywhere near far enough.

The EEA briefing note comments that "*To realise the full environmental and resource-saving benefits, effective measures to ensure that the targets are met must be properly implemented in all EU Member States".*

**It is our observation** that this level of implementation has not been achieved in Ireland.

Our observation coincides with that of the EEA, which shows in Figure 4 of the briefing note (reproduced as our Figure 4 below) the Member States' prospects of meeting the recycling targets for municipal waste and packaging waste.

Ireland is in the "yellow box", as being one of the eight Member States which are at risk of missing the recycling target for municipal waste, but it appears that Ireland is on track to meet the packaging waste target for 2025. Whether this assessment is or is not correct is a matter which we will examine further in section 3 of this submission.

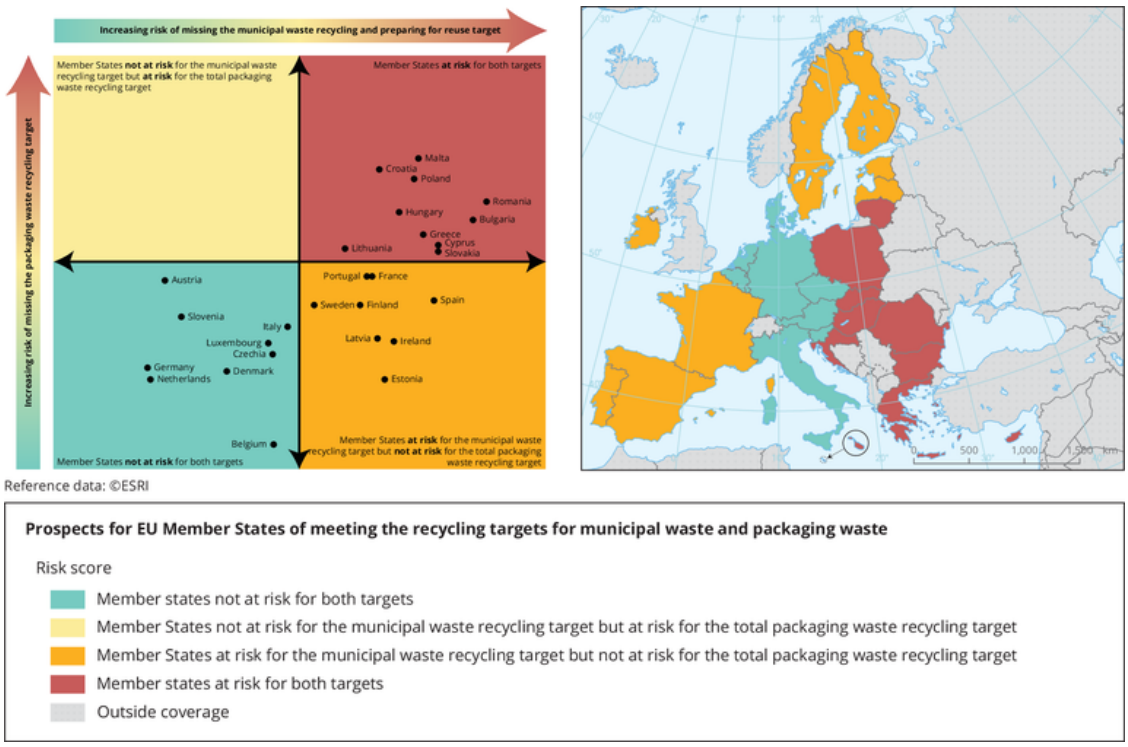



**Figure 4.** **EU Member States' prospects of meeting the recycling targets for municipal waste and packaging waste. From EEA briefing note dated 08 Jun 2023.**

The EEA briefing note comments that …

> *"The analysis shows that the targets for some packaging wastes, such as paper/cardboard and ferrous metals, are likely to be met by most Member States. This reflects well-established waste management practices in these countries coupled with the fact that these materials are reasonably homogeneous material streams. By contrast, the target for plastic packaging clearly poses challenges for a large number of Member States. This reflects the combined complexity of processing mixed plastic waste and having less mature infrastructure and markets for doing so".*

**It is our observation** that Ireland is still a long way off reaching its targets for paper, cardboard, metals and plastics, for the reasons that this country does not fully implement segregation at source, but relies on collecting mixed recyclables which are subsequently sorted, and also relies on exporting wastes to other countries to achieve the required mandatory targets.

However, it is a minor comfort to us that Ireland is not alone, but is joined in the "yellow box" by Portugal, France, Spain, Latvia, Estonia, Sweden and Finland (the inclusion of the last two countries was surprising to us, as we have always considered Sweden and Finland to be "models" which we should follow in the area of waste management).

## 1.2 Links with the EU's Circular Economy Action Plan for a Cleaner and More Competitive Europe

The targets set for the minimisation of municipal waste landfilling, and for recycling of plastic, paper, cardboard, metals and other constituents of municipal waste and packaging waste are also part of the EU's Circular Economy Action Plan for a Cleaner and More Competitive Europe.[9]

That Action Plan highlights the fact that …

> "*Despite efforts at EU and national level, the amount of waste generated is not going down. Annual waste generation from all economic activities in the EU amounts to 2.5 billion tonnes, or 5 tonnes per capita a year, and each citizen produces on average nearly half a tonne of municipal waste. The decoupling of waste generation from economic growth will require considerable effort across the whole value chain and in every home".*

In order to address this problem, the Commission proposed a major revision of EU legislation on batteries, packaging, end-of-life vehicles, and hazardous substances in electronic equipment, with a view to preventing waste, increasing recycled content, promoting safer and cleaner waste streams, and ensuring high-quality recycling.[10]

The Action Plan also includes a proposal to enhance the implementation of recently adopted requirements for extended producer responsibility schemes, and to provide incentives and encourage sharing of information and good practices in waste recycling. These proposals are intended to serve the objective of significantly reducing total waste generation and halving the amount of residual (non-recycled) municipal waste by 2030.

[9] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – A new Circular Economy Action Plan for a Cleaner and More Competitive Europe; COM(2020) 98 final; Brussels, 11.3.2020.

[10] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – A new Circular Economy Action Plan for a Cleaner and More Competitive Europe; COM(2020) 98 final; Brussels, 11.3.2020; Section 4, Less Waste, More Value – 4.1. Enhanced waste policy in support of waste prevention and circularity, p. 12.

## 1.3 Links with the EU's Zero Pollution Action Plan for 2030

The targets described in the EEA briefing note also reflect the Commission's proposals and ambitions in the EU Action Plan: "*Towards Zero Pollution for Air, Water and Soil"*.[11]

The zero pollution targets in the Zero Pollution Action Plan for 2030 state that, under EU law, Green Deal ambitions and in synergy with other initiatives, by 2030 the EU should:

1. reduce by more than 55% the health impacts (premature deaths) of air pollution;
2. reduce by 30% the share of people chronically disturbed by transport noise;
3. reduce by 25% the EU ecosystems where air pollution threatens biodiversity;
4. reduce by 50% nutrient losses, the use and risk of chemical pesticides, the use of the more hazardous ones, and the sale of antimicrobials for farmed animals and in aquaculture;
5. reduce by 50% plastic litter at sea and by 30% microplastics released into the environment; and,
6. significantly total waste generation and by 50% residual municipal waste.

**It is our observation** that these reductions are achievable, and should be a minimum to be attained by 2030, or earlier if possible, even taking into account that when these targets were proposed in May 2021, the target date of 2030 was nine years ahead; whereas at the present time (October 2026), only four years of that period remain. Clearly, much greater effort is needed, especially during the next 3 to 4 years.

The Call for Evidence to which we are responding in this submission states that Environmental Implementation Reports (EIRs) provides a context for analysis, dialogue and collaboration between the European Commission, EU Member States and stakeholders based on the published country reports. EIRs have a wider scope than the Early Warning Reports (EWRs), as they cover all essential topics in environmental policy and law in each EU Member State, and they include a chapter on waste in general.

[11] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Pathway to a Healthy Planet for All; EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil'. COM(2021) 400 final, Brussels, 12.5.2021.

## 1.4 The Importance of the Environmental Implementation Review (EIR) and its Findings

The Environmental Implementation Review (EIR) is a regular reporting tool designed to improve the implementation of EU environmental laws and policies. The first EIR was adopted in 2017, the second in 2019, the third in 2022, and the fourth in 2025. The most recent EIR, published in July last year, states that "*climate change, pollution, and biodiversity loss are among the most serious and urgent risks today, both globally and in the EU, and they are exacerbated by unsustainable resource use"*.[12]

The July 2025 EIR also emphasises that "*environmental protection is a matter of security. For instance, protecting nature means securing € 234 billion of ecosystem services that nature currently provides to our economy; reducing pollution improves people's health, water management, and nature; and the circular economy* ***reduces pollution from extraction and waste*** [our emphasis], *and improves resource efficiency (including water efficiency) and therefore economic security"*.[13]

The implementation gaps identified in the July 2025 EIR concern all areas of EU environmental law and all Member States, to varying degrees. "*Out of the 96 priority actions recommended to the Member States, 22 concern circular economy and* ***waste*** [our emphasis]; *36 concern water and pollution; 28 concern nature and biodiversity; 9 concern governance cases; and 1 concerns financing"*.

The July 2025 EIR also emphasises that "*EU waste policy aims to contribute to the circular economy by extracting high-quality resources from* ***waste*** [our emphasis], *including critical raw materials. The main objective of EU waste policy is to protect the environment and human health from the adverse impacts of waste generation and management"*.[14]

Key findings of the July 2025 EIR (in Section II) include:

- "*Member States show slight progress in their transition to a circular economy –. between 2020 and 2023 the EU-wide circular material use rate increased from 11.2% to 11.8%, while the objective laid down in the Circular Economy Action Plan is to double the 2020 circularity rate by 2030, to 22.4%. Accordingly, more effort is needed, especially to*

[12] Economic and Social Committee and the Committee of the Regions – 2025 Environmental Implementation Review: Environmental implementation for prosperity and security; COM(2025) 420 final; Brussels, 7.7.2025. Part I. The role of implementation in EU environmental law and policy – 1. Goals and challenges (p. 2).

[13] *Ibid.*

[14] *Ibid*, Part II. The state of implementation of EU environmental law and policy; 1. Circular economy and waste (p.12).

*introduce upstream circularity measures across the value chain, focusing on waste generation reduction and material reuse;*

- *Some Member States and regions are spearheading the transition, in terms of circularity indicators and implemented measures, while others lag behind;*
- *The circular transition is urgently needed in particular in the built environment48, to reduce impact (mainly resource consumption and waste), while retaining the value of products and assets within the system, and creating additional environmental, economic and social benefits;*
- *Despite an increase in recycling and a reduction of landfill of municipal waste, many Member States are at risk of not achieving the 2025 "preparing for re-use" and* ***recycling target for municipal waste*** *(55%), the* ***2025 packaging waste recycling target*** *(65%), and the 2035* ***landfill target for municipal waste*** *(10%)* [our emphasis]*. Recycling rate of* ***waste*** *excluding major minerals has not progressed much over the past two decades;*
- *Member States* ***should ensure they have updated national waste prevention programmes to prevent non-recyclable waste*** [our emphasis]*. Many have recently adopted and are implementing waste reforms that to increase recycling rates.* ***High capture rates and quality of separate collection*** [our emphasis] *are essential preconditions for preparing for re-use and recycling; and,*
- *It is necessary to use the full spectrum of economic measures – such as incentives and investments – to reduce landfilling and incineration.* ***Investments are needed to develop waste infrastructure that supports prevention, re-use and recycling performance, particularly for bio-waste and plastic****, and to* ***introduce Deposit Refund Schemes on packaging*** [our emphasis]*".*[15]

These findings support our earlier **observation** that Ireland and several other EU Member States are still a long way off reaching their targets for eliminating the landfilling of municipal wastes, for recycling of municipal wastes and packaging wastes, for preventing the generation of non-recyclable wastes, for implementing effective separate collection systems for recyclables (especially paper, cardboard, metals and plastics), and for developing appropriate waste management infrastructure which would support the Circular Economy. Ireland has since implemented a Deposit and Return Scheme (DRS) for a very limited types of packaging (PET bottles and aluminium and steel cans); and while it is

[15] Economic and Social Committee and the Committee of the Regions – 2025 Environmental Implementation Review: Environmental implementation for prosperity and security; COM(2025) 420 final; Brussels, 7.7.2025. Part II. The state of implementation of EU environmental law and policy; 1. Circular economy and waste; p.14.

working reasonably effectively, it has yet to be extended to cover other types of packaging.

## 1.5 The Importance of Having an Effective Deposit and Return Scheme (DRS) to Encourage Minimisation of Waste

In May 2021, when responding to a public consultation by the Department of Environment, Climate and Communications on the legislative framework and scope of a Deposit Return Scheme in Ireland, we commented that Ireland is already far behind many European countries in the implementation of a DRS, including Iceland (1989), Netherlands (1991), Sweden (1994), Finland (1996), Denmark (2000), Germany (2003), Estonia (2005), Lithuania (2016). Lithuania not only set up a DRS within a year, but in the second year of operation this small country had exceeded the 90% return rate required by the EU Single Use Plastics Directive. This is extremely impressive, as other countries such as Iceland and Sweden which have been operating a DRS for a significantly longer period of time have not yet met this target. This provides confirmation that such a system can be executed on a much shorter time frame than that suggested by the Department.[16]

ZWAI strongly suggested that glass should be included in the accepted materials of the scheme, and we believe there should be a distinction between one-way containers and reusable containers. Glass beverage containers do not need to be reprocessed as they are easily cleaned and reusable and therefore, are much simpler to put back on the market compared to their single use counter parts.

We recommended a system similar to that which Denmark had already implemented, where importers and producers of refillable glass beverage containers are obliged to operate a deposit return system. We proposed that these containers should be part of the scheme in the same way that one-use beverage containers are, with the exception that instead of the systems operator being responsible for them, producers should be responsible for their own containers. This would give the DRS system operator the responsibility for most of the management while obliging beverage producers to accept back their own containers for reuse.

We also recommended (in our May 2021 submission) that Ireland's DRS should include alcoholic beverage containers. A DRS survey in Germany disclosed that more than half the collected material were alcoholic beverage containers, 34% being from beer alone. An Irish national litter survey prepared for the Department of Communications, Climate and Environment in 2019, disclosed that out of all the beverage cans recorded as litter, 40.9% were classified as alcoholic. Given

[16] Submission by Zero Waste Alliance Ireland to the Department of Environment, Climate and Communications on the Legislative Framework and Scope of a Deposit Return Scheme in Ireland, 07 May 2021.

the drinking culture in Ireland we think it would be a huge mistake to exclude this category of beverage packaging.

One of our key recommendations was that the system operator should be chosen wisely and preference should be given to those whose suggested plan prioritises the environmental benefits of the scheme and those who can ensure complete transparency and accountability throughout the scheme. Financial considerations should not be the sole arbiter of the choice.

ZWAI also strongly urged that beverage containers in the scheme are collected and sorted by the system operator and should be genuinely recycled within Ireland, and not exported to Asian countries, or fragmented for incorporation into Refuse Derived Fuel.

Unfortunately, none of our recommendations were implement in Ireland; but it must be accepted that the current DRS is operating reasonably successfully, and that beverage containers (PET bottles and cans) do not regularly appear in street litter collections, except during and after large-scale on-street events such as music festivals in towns.

In most EU Member States the collection of discarded materials or waste is the responsibility of local governments, municipalities or a publicly owned company; while in Ireland the collection and further use or disposal of discarded materials or waste has been handed over to privately owned firms. Therefore, it is the case that the Irish Government has handed control of all our discarded materials to the "waste industry", with the result that the State has lost control over waste, as pointed out in a report by the Competition and Consumer Protection Commission (CCPC).

Elimination of waste, maximisation of recycling, and the longer-term aim of zero waste and zero pollution are essential if the EU is to achieve its aim of becoming climate-neutral by 2050, aided by the European Green Deal, and the legally binding target set by Regulation (EU) 2021/1119. The European Green Deal is a route to transform the EU into a modern, resource-efficient and competitive economy; it was launched in 2019, in response to European citizens' urgent call — especially from young people — for urgent action against climate change, and it sets out a plan to transform Europe's economy, energy, transport, industries and waste management for a more sustainable future.[17]

[17] https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en

# 2. ZERO WASTE ALLIANCE IRELAND (ZWAI)

## 2.1 About ZWAI

At this point we consider that it is appropriate to mention briefly the background, aims, activities, strategy and policies of ZWAI, and to list some of our previous submissions to Irish Government departments and to the European Commission.

### 2.1.1 Origin and Early Activities of ZWAI

Zero Waste Alliance Ireland (ZWAI), established in 1999, and registered as an Irish company limited by guarantee in 2004, is a Non-Government Environmental Organisation (eNGO) and a charity registered in Ireland. ZWAI has prepared and submitted to the European Commission, the Irish Government and to Irish State Agencies many policy documents on waste management and waste elimination, and continues to lobby the Irish Government and the European Commission on using resources more sustainably, on promoting re-use, repair and recycling, and on development and implementation of the Circular Economy.

One of our basic guiding principles is that human societies must behave like natural ecosystems, living within the sustainable flow of energy from the sun and plants, producing no materials or objects which cannot be recycled back into the earth's systems, or reused or recycled into our technical systems, and should be guided by economic systems and practices which are in harmony with personal and ecological values.

Our principal objectives are:

i) sharing information, ideas and contacts,

ii) finding and recommending environmentally sustainable and practical solutions for domestic, municipal, industrial and agricultural waste management and for more efficient and ecologically appropriate uses of natural resources such as scarce minerals, water and soil;

iii) lobbying Government and local authorities to implement environmentally sustainable waste management practices, including clean production, elimination of toxic substances from products, re-use, recycling, segregation of discarded materials at source, and other environmentally and socially beneficial practices;

iv) lobbying Government to follow the best international practice and EU recommendations by introducing fiscal and economic measures designed to penalise the manufacturers of products which cannot be re-used, recycled or composted at the end of their useful lives, and to financially support companies making products which can be re-used, repaired, recycled or are made from recycled materials;

v) raising public awareness about the long-term damaging human and animal health and economic consequences of landfilling and of the destruction by mass burning or incineration of potentially recyclable or re-usable materials;

vi) investigating, raising public awareness and lobbying Irish Government departments and agencies about our country's failure to take adequate care of vulnerable and essential natural resources, including clean water and air, biodiversity, and soil;

vii) advocating changes in domestic and EU legislation to provide for more ecologically appropriate, environmentally sustainable and efficient uses of natural resources; and,

vi) maintaining contact and exchanging information with similar NGOs and national networks in the European Union and in other countries, and with international zero waste organisations.

### 2.1.2 Our Basic Principles

Human communities must behave like natural ecosystems, producing no wastes which cannot be recycled, and guided by economic values which are in harmony with personal and ecological values. In nature, the waste products of every living organism serve as raw materials to be transformed by other living creatures, or benefit the planet in other ways. Instead of organising systems that efficiently dispose of or recycle our waste, we need to design systems of production that have little or no waste to begin with.

There are no technical barriers to achieving a "zero waste society", only our habits, our greed as a society, and the current economic structures and policies which have led to the present environmental, social and economic difficulties.

"Zero Waste" is a realistic whole-system approach to addressing the problem of society's unsustainable resource flows – it encompasses waste elimination at source through product design and producer responsibility, together with waste reduction strategies further down the supply chain, such as cleaner production, product repairing, dismantling, recycling, re-use and composting.

### 2.1.3 What We are Doing

Zero Waste Alliance Ireland has prepared many policy documents on waste management, we continue to lobby the Government of Ireland on the issue of sustainable resource management, and to express our concern at the failure to address Ireland's waste problems at a fundamental level.

In recent decades, as older landfills were closed or became better managed (primarily as a consequence of the implementation of European Directives, Irish legislation transposing these Directives, the development of a waste licensing

regime by the Environmental Protection Agency, and the establishment of the Office of Environmental Enforcement in 2003), concern about the public health effects of landfills decreased considerably.

ZWAI therefore concentrated more on the objectives of ensuring that Ireland's government agencies, local authorities and other organisations would develop and implement environmentally sustainable resources and waste management policies, especially resource efficiency, waste reduction and elimination, the promotion of re-use, repair and recycling, and the development and implementation of the Circular Economy.

As an environmental NGO, and a not-for-profit company with charitable status since 2005, ZWAI also campaigns for the implementation of the UN Sustainable Development Goals, including (but not limited to) **Goal 12, Responsible Consumption and Production**, and Goal 6, Clean Water and Sanitation (having particular regard to the need to avoid wasting water, and to wasting nutrients contained in our wastewater); and Goal 15, to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, to halt and reverse land degradation and to halt biodiversity loss

Our work therefore became more focused on responding to public consultations, giving presentations on waste-related topics, and evaluating Irish Government and EU policies on the use, reuse, and recycling of materials and energy, on identifying wasteful practices, and on promoting the Circular Economy. Examples of our submissions and presentations include:

- How Ireland, the European Union and the Irish food industry should address the problems of single-use plastic packaging and plastic waste (March & November 2019);
- Transforming the construction industry so that it could become climate-neutral (instead of becoming increasingly reliant on toxic materials, and a major continuing emitter of greenhouse gases);
- Many observations and submissions on the need for recovery and reuse of the phosphorus and nitrogen content of wastewater (2019 to 2026);
- Observations to the European Commission on a proposed revision of the EU Regulation on Shipments of Waste (January 2022);
- Feedback to the European Commission on a proposed Directive on Soil Health – protecting, sustainably managing and restoring EU soils (March 2022);
- Submission in response to a public consultation on a review of the security of Ireland's energy supplies (October 2022);

- Submission in response to a public consultation on Ireland's Fourth National Biodiversity Action Plan (November 2022);
- Submission in response to a public consultation on Ireland's National Bioeconomy Action Plan 2023-2025 (January 2023);
- Presentation on the topic of "One Earth for All – A Plea for Sustainability", given at the National Sustainability Summit, Dublin (February 2023);
- Submission in response to a public consultation on Ireland's draft Waste Management Plan for a Circular Economy (July 2023);
- Submission in response to a public consultation on the problem of disposable vaping devices (July 2023);
- Observations and recommendations on the European and global problem of waste electronic & electric equipment (WEEE, Sept. 2023);
- Observations to the European Commission on a Proposed EU Directive on Soil Monitoring and Resilience (November 2023);
- Observations on the Irish Government's draft Green Public Procurement Strategy & Plan (November 2023);
- Observations and feedback to the European Commission on the proposed revision of the EU Waste Framework Directive (November 2023);
- Observations & feedback to the European Commission on revision of Directives 2000/53/EC & 2005/64/EC on End-of-Life Vehicles (December 2023);
- Submission by ZWAI to the Department of the Environment, Climate and Communications in response to the Department's public consultation on proposed amendments to the Access to Information on the Environment (AIE) Regulations 2007-2018 (January 2024);
- Response to the first Public Consultation by the Department of the Environment, Climate and Communications on Ireland's draft National Energy and Climate Plan (March 2024);
- Submission to the European Commission on the evaluation of the Nitrates Directive (91 / 676 / EEC) on Protection of Waters against Pollution caused by Nitrates from Agricultural Sources (March 2024);
- Response to the second Public Consultation by the Department of the Environment, Climate and Communications on Ireland's updated draft National Energy and Climate Plan (June 2024);

- Submission by ZWAI to the European Commission in response to the Commission's public consultation on proposed ecodesign and ecolabelling requirements for computers (July 2024);

- Submission by ZWAI and the Waterford Environmental Forum to the Department of Transport in response to the Department's Public Consultation: "Moving Together – A Strategic Approach to Improving the Efficiency of the Transport System in Ireland" (August 2024);

- Submission by ZWAI to the Irish Department of Housing, Local Government and Heritage in response to the Department's Public Consultation on Draft Proposed Additional Measures for Ireland's Fifth Nitrates Action Programme (December 2024);

- Submission by ZWAI to the European Commission in response to the Commission's public consultation on the European Union Ocean Pact, on the importance of Europe's surrounding seas and the Atlantic Ocean, and their fundamental role in sustaining life on our planet (February 2025);

- Submission by ZWAI to the Department of the Environment, Climate and Communications, in response to a public consultation on Ireland's draft National Implementation Report 2025 to the Aarhus Convention Secretariat (April 2025);

- Submission by ZWAI to the Department for Infrastructure, North of Ireland, in response to a Transboundary EIA Public Consultation on a Proposed Gold Mine Project in the Sperrin Mountains, County Tyrone (April 2025);

- Submission by ZWAI to the European Commission on proposed draft amendments to a delegated regulation (EU) 2019/1122 to improve carbon accounting in the EU Registry under Regulation (EU) 2018/841 for the Land use, Land Use Change and Forestry (LULUCF) sector (May 2025);

- Submission by ZWAI to the European Commission in response to the Commission's call for evidence on a New Policy Initiative and a New Agenda for Cities and Urban Areas (May 2025);

- Submission by ZWAI to Department of Climate, Energy and the Environment on the draft National Policy Statement and Roadmap for Circular Textiles (July 2025);

- Submission by ZWAI to the European Commission on a proposed roadmap towards Nature Credits (30 September 2025);

- Submission by ZWAI to the European Commission on a proposed targeted simplification of the EU Framework of Regulatory Measures in Agriculture and Food Safety (14 October 2025);

- Submission by ZWAI to the Department of Climate, Energy and the Environment on proposed second Whole-of-Government Circular Economy Strategy 2026-2028 (05 November 2025);

- Submission by ZWAI to the Department of Housing, Local Government and Heritage on the draft sixth nitrates action programme (NAP) (01 December 2025);

- Submission by ZWAI to the Department of Climate, Energy and the Environment on the third National Implementation Plan for the attainment of Ireland's Sustainable Development Goals (16 January 2026);

- Joint submission by Zero Waste Alliance Ireland and Zero Waste North West in response to the European Commission's call for evidence on measures to address the problems of marine litter caused by single-use plastic products and fishing gear (17 March 2026);

- Submission by ZWAI to the European Commission on a new common strategic framework for Europe's islands (01 April 2026);

- Submission by ZWAI in response to the European Commission's call for evidence on the proposed targeted revision of the Water Framework Directive (14 April 2026);

- Submission by ZWAI in response to the European Commission's call for evidence on the proposed revision of national targets and flexibilities in the EU Climate Policy Framework after 2030 (04 May 2026);

- Submission by ZWAI in response to the European Commission's call for evidence on proposed simplification of administrative burdens in environmental legislation (Eighth Omnibus Package) (07 May 2026); and,

- Submission by ZWAI in response to a public consultation by the Dep't of Housing, Local Government and Heritage on the first draft of Ireland's National Nature Restoration Plan (NRP) (01 July 2026).

- Submission by ZWAI in response to a public consultation by the European Commission on the European Oceans Pact (16 July 2026).

- Submission by ZWAI in response to a public consultation by the Dep' of Climate, Energy and the Environment on the National Food Waste Prevention Roadmap 2026-2028 (04 September 2026).

It will be clear that ZWAI is primarily concerned with the very serious issues of discarded substances, materials and goods, whether from domestic, commercial or industrial sources, how these become "waste", and how such "waste" may be prevented by re-design along ecological principles. These ecological principles

can be equally applied to the many ways in which we abstract and use water as a resource, and to the volumes of wastewater produced as a consequence of these uses. ZWAI is also very concerned about the effectiveness and appropriateness of Irish and EU policies, legislation, programmes and plans which are the prime determinants of how these "wastes" are managed, controlled and monitored for environmental and societal benefits.

In-depth examination and analysis of national policies have made us very aware of the many disconnections and conflicts between economic, environmental, land-use planning and social policies, frequently resulting in failure to implement necessary changes. While making the submissions listed above, we have welcomed many proposed policy changes; but at the same time we have also considered that it was very necessary to evaluate all proposals in the context of what is best for the environment and society.

**ZWAI** is a member of the Irish Environmental Network, and is funded by the **Department of Communications, Climate Action and the Environment** through the **Irish Environmental Network**.

ZWAI is also a not-for-profit company limited by guarantee (Company registration number **394205**), and a registered charity (CRN number **20057244**). Membership has been growing in recent years, and is currently more than 70 individuals, and the company's affairs and activities are supervised by an 8-person Board of Management (Directors), some of whom are regular contributors to submissions, or who make presentations at conferences.

In 2019 ZWAI became a full member of the **European Environment Bureau** (EEB); and a member of the **Waste Working Group** of the EEB. Through the EEB, we contribute to the development of European Union policy on waste and the Circular Economy. In November 2021, the EEB established a **Task Force on the Built Environment**; ZWAI is a member of this task force, and we contribute to discussions on the sustainability of construction materials, buildings and on the built environment.

In May 2025, ZWAI became a member the **Climate Action Network** in Europe (**CAN-EU**), and is actively participating in discussions and online meetings, where the links between extractivism, consumerism, wastefulness and their adverse effects on the Earth's climate are being investigated to provide evidence to support advocating for a just transition to a zero-carbon society. As a member of CAN-EU we have participated in discussions on the priorities for Ireland's current Presidency of the European Council.

# 3. Our Observations and Recommendations in Response to Member States' Progress towards the 2030 Targets for Reduction and Recycling of Waste

## 3.1 Municipal Waste & Landfilling

We have written about improving Ireland's municipal waste recycling rates back in 2022, where we pointed to many of the same issues and recommendations made in this submission.[18] For example, we already pointed out that Ireland was lagging behind on its municipal waste recycling targets, and it is relevant to note that in the time since that submission was made, the issue remains unresolved.

We also made a submission in 2023 to the Regional Waste Management Planning Offices in Ireland on the draft Waste Management Plan for a Circular Economy.[19] In that submission, we pointed to several recommendations on how to improve Ireland's waste management performance, including circular economy methods, following the EU's Waste Hierarchy, Extended Producer Responsibility (EPR) schemes, expanding the recycling infrastructure, increasing the separate waste collection, and focussing on public awareness and education. The current submission again recommends many of the same proposals.

More recently, we did a submission responding to Ireland's National Food Waste Prevention Roadmap 2026-2028. Due to the nature of the submission being only in questionnaire form, we unfortunately do not have a document or link to which we can refer to view the submission. However,

### 3.1.1 Data on Municipal Waste

The latest municipal waste data published by the Environmental Protection Agency (EPA) shows that Ireland generated 3.11 million tonnes of municipal waste in 2024, with a municipal recycling rate of 43%, equivalent to approximately 1.32 million tonnes recycled. Ireland remains significantly below the EU municipal waste recycling target of 55% for 2025, and the EPA estimates that an additional 388,000 tonnes of municipal waste would need to be recycled annually to achieve this target if waste generation remains unchanged. The EPA's forecasting models

[18] Husain, N.N. (2022). *Improving Ireland's Municipal Waste Recycling Rates: Assessment and Way Forward.* https://www.zwai.ie/2022/06/improving-irelands-municipal-waste-recycling-rates-assessment-and-way-forward/

[19] Zero Waste Alliance Ireland (2023). *Submission to the Regional Waste Management Planning Offices on the draft Waste Management Plan for a Circular Economy.* https://www.zwai.ie/resources/2023/submission-on-the-draft-waste-management-plan-for-a-circular-economy/

indicate that Ireland is unlikely to meet the target without significant intervention.[20] [21]

Of the waste recycled in 2024:

- 828,427 tonnes underwent material recycling;
- 493,536 tonnes were treated through composting or anaerobic digestion;
- 1,278,279 tonnes were incinerated with energy recovery, accounting for 41% of municipal waste managed; and,
- 473,121 tonnes were landfilled, representing a 15% landfill rate.[22]

In its Waste Early Warning Report 2023 (see section 1.1 above), and the accompanying country-specific factsheets, the European Commission's Directorate-General for Environment concluded that Ireland was at risk of missing the target for preparing for re-use and recycling of municipal waste. However, it was considered likely to meet packaging-recycling targets and the long-term landfill target.[23]

The report identified several key challenges:

- Low capture rates of recyclable materials through separate collection systems, particularly plastic packaging;
- Limited infrastructure for separate collection and treatment of bio-waste; and,
- Insufficient economic incentives to move waste management higher up the waste hierarchy and reduce reliance on mixed waste treatment.[24]

The report recommended:

1. Supporting preparation-for-reuse activities and reusable packaging systems;

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[20] Environmental Protection Agency (Ireland). *Ireland's Progress to Circular Economy Targets.* Available at: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/progress-to-circular-economy-targets/

[21] Environmental Protection Agency (Ireland). *Municipal Waste Statistics for Ireland (2024).* Available at: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/municipal/

[22] Ibid.

[23] Environmental Protection Agency (Ireland). *Ireland's Progress to Circular Economy Targets*. Available at: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/progress-to-circular-economy-targets/

[24] Ibid.

2. Improving separate collection of bio-waste, particularly door-to-door collection;

3. Expanding bio-waste treatment infrastructure and supporting home composting; and,

4. Introducing economic instruments, including measures such as incineration taxes, to incentivise recycling and discourage the disposal of waste.[25]

The latest EPA findings suggest that most of these recommendations remain highly relevant:

- **Improving Bio-waste Collection:** Organic waste remains the largest component of both household and commercial waste streams. The EPA found that substantial quantities of food waste continue to be disposed of in residual waste bins rather than being separately collected for organic treatment. Approximately 70% of commercial organic waste was still being managed through mixed residual waste collections.[26]

- **Improving Waste Segregation and Capture Rates:** Household waste composition studies found that 58% of mixed residual waste consisted of materials that should not have been present in residual bins, indicating ongoing losses of recyclable and organic materials from the recycling system. Paper, cardboard, plastics and food waste continue to appear in significant quantities within residual waste streams.[27]

- **Reducing Dependence on Residual Waste Treatment:** The continued reliance on incineration, which accounted for 41% of municipal waste treatment in 2024, suggests that significant volumes of potentially recyclable materials remain within mixed waste streams. While energy recovery performs better than landfill in the waste hierarchy, it does not substitute for recycling and waste prevention.[28]

To improve municipal waste performance and support achievement of the 2030 recycling targets, consideration should be given to:

- **Strengthening source segregation requirements for households and businesses.** This essentially means requiring waste to be separated at the point where it is produced, rather than mixed together and sorted

[25] Ibid.

[26] Environmental Protection Agency (Ireland). *Municipal Waste Statistics for Ireland (2024).* Available at: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/municipal/

[27] Ibid.

[28] Ibid.

later.[29] The reason this is being emphasised is that the EPA found that more than two-thirds of the materials placed in general waste bins could instead have been put into recycling or organic waste bins, including significant amounts of food waste, plastics, paper and cardboard.[30] In practical terms, this step would involve:

- Households separating waste into different streams, such as general/residual waste, mixed recycling, food/organic waste.[31] [32]
- Businesses being required to segregate waste streams, particularly food waste, recyclables and residual waste, rather than disposing of everything in a general waste bin.[33] [34]
- Ensuring access to appropriate bins and collection services, including organic waste bins for households and commercial premises. The EPA has highlighted that many households and businesses still lack organic waste bins, making proper segregation difficult.[35]

[29] Department of Climate, Energy and the Environment (2023). *Household and Commercial Waste*. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/household-and-commercial-waste/

[30] Environmental Protection Agency (2023). *EPA calls for urgent action to improve Ireland's household and commercial waste segregation and recycling performance*. Available at: https://www.epa.ie/news-releases/news-releases-2023/epa-calls-for-urgent-action-to-improve-irelands-household-and-commercial-waste-segregation-and-recycling-performance-.php

[31] Ibid.

[32] Department of Climate, Energy and the Environment (2023). *Household and Commercial Waste*. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/household-and-commercial-waste/

[33] MyWaste (n.d.). *Information Note: Commercial Premises Regulatory Obligations*. Available at: https://mywaste.ie/wp-content/uploads/2026/03/Information-Note-Commercial-Premises-Regulatory-Obligations.pdf

[34] Greyhound (2026). *Commercial Food Waste Regulations in Ireland: What Your Business Must Know in 2026.* Available at: https://greyhound.ie/commercial-food-waste-regulations-in-ireland/

[35] Environmental Protection Agency (2023). *EPA calls for urgent action to improve Ireland's household and commercial waste segregation and recycling performance*. Available at: https://www.epa.ie/news-releases/news-releases-2023/epa-calls-for-urgent-action-to-improve-irelands-household-and-commercial-waste-segregation-and-recycling-performance-.php

  - Improving compliance and enforcement, including inspections and regulatory requirements for commercial premises to maintain separate waste streams.[36] [37]

- **Expanding and improving separate bio-waste collection systems:** This includes ensuring that households and businesses have access to dedicated food and organic waste collection services. This would help divert biodegradable waste from residual waste bins, reduce landfill disposal, support composting and anaerobic digestion.[38]

- **Increasing investment in recycling and bio-waste treatment infrastructure:** This entails expanding recycling facilities, composting and anaerobic digestion capacity, upgrading waste sorting technologies and ensuring that households and businesses have access to adequate collection and treatment services. This would help increase recycling rates, recover valuable resources from waste and reduce reliance on landfill.[39]

- **Supporting repair, reuse and circular economy initiatives:** This would include measures that encourage consumers and businesses to repair, refurbish, share, donate and reuse products rather than discard them. This could include repair services, reuse centres, repair cafés, second-hand markets, product sharing schemes and other initiatives that help extend the lifespan of goods and reduce waste generation.[40]

- **Enhancing public awareness campaigns and behaviour-change programmes:** These would help households and businesses better understand how to prevent waste, separate materials correctly, reduce food waste, and make greater use of recycling, repair and reuse options. Improved awareness and education can in turn, encourage more sustainable habits.[41]

- **Reviewing economic instruments that encourage recycling and discourage disposal and residual waste treatment:** Here we consider

[36] MyWaste (n.d.). *Information Note: Commercial Premises Regulatory Obligations*. Available at: https://mywaste.ie/wp-content/uploads/2026/03/Information-Note-Commercial-Premises-Regulatory-Obligations.pdf

[37] Greyhound (2026). *Commercial Food Waste Regulations in Ireland: What Your Business Must Know in 2026.* Available at: https://greyhound.ie/commercial-food-waste-regulations-in-ireland/

[38] Department of Climate, Energy and the Environment (2023). *Household and Commercial Waste*. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/household-and-commercial-waste/

[39] Ibid.

[40] Ibid.

[41] Ibid.

including charges, levies and incentives that influence how waste is managed. Examples include landfill levies and waste recovery levies, which are intended to make disposal and lower-value waste treatment options less attractive while encouraging waste prevention, reuse, segregation and recycling.[42]

- **Developing stronger measures to prevent waste generation in the first instance, particularly in relation to packaging and food waste:** This could include reducing unnecessary packaging, promoting reusable alternatives, improving product design, and implementing measures across the food supply chain to prevent food waste before it occurs. Waste prevention sits at the top of the waste hierarchy and is generally regarded as the most effective approach to reducing environmental impacts and resource use.[43] [44]

### 3.1.2 Landfilling and Human Rights

Ireland's municipal landfill rate was 15% in 2024, a relatively low proportion compared with historical levels, and Ireland is considered likely to achieve the EU target of reducing municipal waste sent to landfill to 10% by 2035.[45] [46]

Modern landfill facilities operate under significantly stricter environmental regulation than those which existed several decades ago. Contemporary landfills are subject to environmental permitting, monitoring requirements, leachate management systems, gas collection systems and environmental impact controls intended to reduce risks to surrounding communities and the environment.[47]

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[42] Department of Climate, Energy and the Environment (2023). *Introduction of New Environment Levies Will Incentivise Recycling and Help Ireland Meet Our EU Waste Targets*. Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/press-releases/introduction-of-new-environment-levies-will-incentivise-recycling-and-help-ireland-meet-our-eu-waste-targets/

[43] Department of Climate, Energy and the Environment (2024). *Prevent Waste.* Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/prevent-waste/

[44] Department of Climate, Energy and the Environment (2022). *National Food Waste Prevention Roadmap 2023-2025.* Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-food-waste-prevention-roadmap-2023-2025/

[45] Environmental Protection Agency (Ireland). *Municipal Waste Statistics for Ireland (2024).* Available at: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/municipal/

[46] Environmental Protection Agency (Ireland). *Ireland's Progress to Circular Economy Targets.* Available at: https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/progress-to-circular-economy-targets/

[47] Environmental Protection Agency (2013). *Landfill Manuals: Landfill Site Design*. Available at: https://www.epa.ie/publications/compliance--enforcement/waste/landfill-manuals-landfill-site-design.php

Historically, concerns have been raised regarding the working conditions and community impacts associated with landfill operations. Communities living near landfill sites have reported concerns relating to odours, vermin, smoke, dust and other environmental nuisances, while waste management practices in earlier periods generally provided fewer environmental controls than those required of modern landfill facilities. Research has also highlighted the potential for exposure to emissions, leachate and other environmental hazards associated with landfill operations.[48]

Although waste management practices have changed substantially, landfill operations can still give rise to environmental justice and human rights concerns if they affect local communities. Potential issues include:

- Exposure to odours and airborne pollutants, including wind-blown litter;
- Increased vermin, including rodents and insects;
- Activities of scavenging birds which carry items from landfills (where the surface has not been covered daily) and drop these items onto neighbouring farmland;
- Traffic impacts associated with waste transportation;
- Potential contamination risks affecting local environmental quality;
- Nuisance impacts that may affect quality of life and enjoyment of property; and,
- Disproportionate impacts on communities located near waste infrastructure.[49]

These impacts go beyond environmental concerns and can affect people's health, wellbeing, dignity and everyday quality of life, as well as their opportunity to participate in decisions about their local environment.

In fact, recent environmental justice research highlights a significant concern that waste management facilities are often located disproportionately near socio-economically disadvantaged communities, resulting in unequal exposure to environmental burdens and associated health risks. Studies have identified

[48] Hird, M.J. (2013). Waste, Landfills, and an Environmental Ethic of Vulnerability. *Ethics & the Environment, 18*(1), 105-124. Available at: https://www.jstor.org/stable/10.2979/ethicsenviro.18.1.105

[49] Smith, L. (2026). *A Debate on the Impact of Waste Management Sites on Local Communities.* Research Briefing, 13 July 2026. Available at: https://commonslibrary.parliament.uk/research-briefings/cbp-10961/

associations between residential proximity to waste facilities and a range of adverse health outcomes.[50]

Consequently, when it comes to landfill sites, environmental justice is ultimately about fairness. Communities should not be expected to carry an unfair share of the environmental impacts associated with waste disposal. People should be informed, consulted and given meaningful opportunities to have their views heard when decisions are made about waste infrastructure in their area.

A human rights-based approach therefore, considers not only compliance with environmental regulations, but also whether communities are treated fairly and have a real voice in decisions that affect where they live. This brings about principles of transparency, public participation and accountability.

These principles are reflected in the Aarhus Convention, which guarantees three key procedural environmental rights:

- Access to environmental information;
- Public participation in environmental decision-making; and,
- Access to justice in environmental matters.[51] [52]

Accordingly, communities potentially affected by landfill operations should have timely access to environmental information, meaningful opportunities to participate in planning and permitting processes, and effective mechanisms through which concerns can be raised and addressed.

Furthermore, disposal of waste by landfilling creates responsibilities which may extend beyond the present generation. Waste remains capable of generating environmental impacts long after disposal, highlighting the importance of a precautionary approach, effective regulation and ongoing monitoring. Research on environmental justice demonstrates that sustainable waste management must

[50] Domingo, J.L. (2026). The Burden of Waste: Environmental Justice, Health Risks, and Socioeconomic Disparities Near Waste Management Facilities. *Environmental Research, 305*, 125056. Available at: https://doi.org/10.1016/j.envres.2026.125056

[51] European Commission. *The Aarhus Convention and the EU.* Available at: https://environment.ec.europa.eu/law-and-governance/aarhus_en

[52] United Nations Economic Commission for Europe (UNECE). *Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention).* Available at: https://unece.org/environment-policy/public-participation/aarhus-convention/text

address both present and future risks while ensuring that environmental burdens are not borne disproportionately by particular communities.[53] [54]

## 3.2 Food Waste

As discussed in ZWAI's recent submission to the Public Consultation regarding the National Food Waste Prevention Roadmap 2026-2028, our current capitalist and globalised food supply chain is a shocking litany of inefficiencies.

Adverse environmental impacts of food waste include:

1. **Greenhouse Gas Emissions**: Food waste contributes to 3.3 billion tonnes of $CO_2$-equivalent emissions annually;

2. **Resource Wastage**: Significant volumes of water used in food production are wasted. Deforestation, habitat loss and soil damage resulting from food production, especially meat from grazing animals, used to produce food which is ultimately discarded as waste.

3. **Biodiversity Loss** caused by unsustainable agricultural practices, such as intensive or monoculture farming, driven by demand for cheap food.

Only 11% of Ireland is forested, principally due to clearance for agriculture; this clearing of native woodlands was and is driven by our overproduction (especially in the form of factory farmed meat) and overconsumption of meat. And yet, Ireland exports 80-90% of the beef and dairy it produces, and imports 80% of the food we eat. As Messner, et al. (2020)[55] understand, *"[t]he idea of food waste prevention itself is beset by several conceptual paradoxes: it is considered the most preferred method to manage waste – which it was supposed to prevent in the first place, and it is an ambiguous ecological behaviour lacking the tangible characteristics of waste composting or recycling (i.e. prevention by its nature is invisible). Most importantly, food waste prevention, like other major sustainability challenges, appears to be in a fundamental conflict of interest with current economic norms and practices."*

It is disingenuous for the European Commission, EU Member States, and stakeholders to ask for 'calls for evidence' concerning food waste, while failing to acknowledge the current state of global food production. Food production is

[53] Hird, M.J. (2013). Waste, Landfills, and an Environmental Ethic of Vulnerability. *Ethics & the Environment, 18*(1), 105-124. Available at: https://www.jstor.org/stable/10.2979/ethicsenviro.18.1.105

[54] Domingo, J.L. (2026). The Burden of Waste: Environmental Justice, Health Risks, and Socioeconomic Disparities Near Waste Management Facilities. *Environmental Research, 305*, 125056. Available at: https://doi.org/10.1016/j.envres.2026.125056

[55] Messner, R., Richards, C. & Johnson, H. (2020). "The 'Prevention Paradox': food waste prevention and the quandary of systemic surplus production. *Agric Hum Values, 37*, 805–817. https://doi.org/10.1007/s10460-019-10014-7

currently “Big Business”, managed and orchestrated by a handful of enormous, internationally operating corporations. See, for example, the UN Thematic Report A/80/213: Corporate power and human rights in food systems - Report of the Special Rapporteur on the right to food.[56]

It is beyond the scope of this response to provide an additional thesis detailing the problems caused by corporate takeover of global foods systems, and its consequences for the environment and human communities, but we underscore the reality that very little progress can be made in any area of food waste management without first addressing this massive underlying issue. Corporate dominance of food systems and regulatory are jointly and severally responsible for food overproduction; destructive, degenerative land use; global destruction of forests; massive and often unchecked and unregulated pollution of water and soil; excessive dependence on fossil fuel-based pesticides and GMO seeds; damage to soil health; destruction of native, local food cultures; and abuse of farmers and other agricultural workers. We also see, very clearly, that industrialised farming and the current global food system have not eradicated the problem of human malnutrition and starvation. They have, in fact, exacerbated it.

Large-scale farming also remains a major contributor to $CO_2$ emissions the world over. There is a bitter irony to this: over-farming and overproducing increase environmental damage and climate warming, thereby contributing to ever-worsening floods, droughts, and extreme seasonal temperatures, which in turn threaten or destroy the ability to grow crops for food. Therefore, if the EWR *“aims to guide Member States in implementing measures that can improve their performance on waste prevention and management and, specifically, improve recycling rates and reduce both disposal and reduce food waste across the EU”,* we suggest that the Commission might give consideration to previous ZWAI submissions to the EU which describe, in depth, circular and local food economic practises and regenerative farming practises.

Meat consumption across the EU needs to be addressed. Not only does the over-production (especially through factory/industrial farming) and consequent over-consumption of meat create significant human-health problems, it also contributes significantly to environmental damage (in Europe and globally) including climate change, deforestation, wild animal habitat loss, and fresh-water pollution.[57]

Europe must play a critical role in deconstructing these global corporate agribusinesses and creating new, equitable, and sustainable systems – both at

[56] Fakhri, M. (2025). *UN Thematic Report A/80/213: Corporate power and human rights in food systems - Report of the Special Rapporteur on the right to food.* https://www.ohchr.org/en/documents/thematic-reports/a80213-corporate-power-and-human-rights-food-systems-report-special

[57] United Nations (n.d.). *Food and Climate Change: Healthy diets for a healthier planet.* https://www.un.org/en/climatechange/science/climate-issues/food

home and abroad. This is how we stop food waste at source. Further reading and sources on our unsustainable food systems can be found the footnotes.[58] [59] [60] [61] [62] [63]

**It is also our submission** that laws or regulations should be introduced on Ultra-processed Foods (or UPFs, which have not been addressed at all within Ireland's current draft National Food Waste Prevention Roadmap 2026-2028),[64] considering the fact that these foods often contain little or no nutritional value while still utilising previous food resources, and that they are increasingly considered to trigger addictive-like eating behaviours, both of which could be considered wasteful.[65] Laws concerning UPFs should:

- Limit the amounts of UPFs which convenience and grocery stores are allowed to stock (monthly, annually);
- Create legal limits as to the amount of UPFs that EU member states can import;
- Set realistic serving-size/portion guides for restaurants and take-aways, based on Daily Recommended Intakes;

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[58] Global Network Against Food Crises (2026). *2026 Global Report on Food Crises - Mid-year Update.* https://www.fightfoodcrises.net/global-report-food-crises

[59] UNHCR (2025). *Acute food insecurity and malnutrition rise for sixth consecutive year in world's most fragile regions – new report*. https://www.unhcr.org/news/announcements/acute-food-insecurity-and-malnutrition-rise-sixth-consecutive-year-world-s-most?bg_source=ga&bg_campaign=22198462751&bg_kw=-mi--pi--ppi-&bg_source_id=&gad_source=1&gad_campaignid=22198464140&gbraid=0AAAAA-Pr7klxYGWfZv2eomRp1-PUiiYn8&gclid=Cj0KCQjw6ObWBhDDARIsAFdfcUj8MO8M2mUA0BJl0mG6uAqA5zINwGjsLTndzDJTx--Zw3fqbF78A9caAkM6EALw_wcB

[60] Oxford Martin Programme on the Future of Food (n.d.). *Challenges facing the Food System.* https://www.futureoffood.ox.ac.uk/food-system-challenges

[61] National Right to Food Community of Practice (2025). *Corporate capture of the food system in the united states hinders the realization of the right to food.* https://33aa917d-14e2-4ab7-9c35-6f1b2020e321.filesusr.com/ugd/c8ac2a_8ec414e3517e44aca5dd9c07e620e06c.pdf

[62] EC Joint Research Centre (2026). *Food crises across the globe: acute food insecurity remains alarmingly high*. https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/food-crises-across-globe-acute-food-insecurity-remains-alarmingly-high-2026-09-21_en

[63] Malik, S. (2025). *Global Food System Crisis: Corporate Control and Its Impact on Hunger.* https://worldbeeproject.org/2025/03/12/global-food-system-crisis-corporate-control/

[64] Department of Climate, Energy and the Environment (2022). *National Food Waste Prevention Roadmap 2023-2025.* Available at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-food-waste-prevention-roadmap-2023-2025/

[65] EuroHealthNet (2025). *Tackling ultra-processed food for a healthier and just food system.* https://eurohealthnet.eu/publication/tackling-ultra-processed-food-for-a-healthier-and-just-food-system/

- Require the food donated to food banks to be of a certain standard, with fresh foods and multi-serving ingredients/items being prioritised, and UPFs being denied; and,

- Combat UPF advertising and product-placement in stores that target and 'hook' consumers, especially children.

Laws on labelling should also be introduced to:

- Create a label for UPFs, to be mandatory on food packaging; and included in this label should be a definition of UPFs and a weblink to more information about them;

- Provide much more rigorous information on contents, ingredients and food packaging. The specific percentages of additives such as emulsifiers, colourants, and preservatives should be listed together with percentages per serving of fats, sugar, salt, etc.;

- Clear unit pricing (per kilo/litre) is mandatory in all EU Member States, yet in Ireland most shops show the price of each individual item in a large and easily readable form, while the price per kilo or per litre is either absent; or, if it is present at all, is shown in a very small typeface or font, which can be almost unreadable without close inspection. Legislation should be introduced requiring the price per kilo or per litre to be shown in the same size type or font as the price of the item; and,

- Like tobacco products, warnings regarding the adverse consequences of consuming UPFs and additives should be printed on all UPF packaging.

## 3.3 Packaging Waste

### 3.3.1 Food and Packaging

Ireland generates approximately 233.8 kg of total packaging waste per inhabitant (placing it among the highest in the European Union); and, in recent years, Ireland generated about 1.19 million to 1.24 million tonnes of total packaging waste (approximately 247 kg per capita or ~233.8 kg per inhabitant depending on the baseline year).

Ireland produces annually some 65 to 73 kg of plastic packaging waste per person, which is nearly double the EU average of around 36 kg per capita.

Plastic packaging waste accounts for about 29.8% of Ireland's total packaging waste (one of the highest in the EU), and plastic recycling rates remain very low at around the official figure of 28%, with a large portion sent for incineration. Only about 30% of plastics are actually recycled – and these plastics are mostly

downcycled to items such as fence posts, the remainder being exported for re-processing, burned by incineration or as a fuel in cement plants.

**It is our submission** that curbing or regulating the power currently exercised by global corporate agribusinesses, and implementing a transition to equitable and sustainable food production and distribution will also, simultaneously, solve the crisis we currently have with plastic food packaging, and the quantities of waste generated by such packaging.

We would like to remind the European Commission, EU Member States, and stakeholders that Ireland also has yet to fully comply with the SUP Directive by banning, at the bare minimum required, the Directive's listed plastics (almost all of them related to food consumption). Every single one of the items listed in the SUP directive are still cheaply, easily, and readily available in stores across the country. And almost all these items are food related. Ireland, and all other EU member states, must double-down on their environmental obligations – which they have unambiguously agreed to do in law – if they have an earnest interest in eradicating these problems.

**It is our submission** that the EU Commission should introduce regulations which would have the effect of eliminating excessive (especially plastic) food packaging waste, which corporations are required to abide by, and make the consequences for failing to do so significant. Paying fines clearly does not, and will not, deter corporations from continuing to rely on plastic packaging.

**It is also our submission** that, in addition to the above, the following should be considered:

- Ban any/all packaging which cannot be recycled, or is not biodegradable, and move to compostable packaging wherever possible;
- Create more recycling facilities and bring-banks – or require the corporations and companies making what will become packaging waste, who do business in the EU, to create them;
- Educate the public on home composting;
- Support smaller, localised farming, and farmers' markets;
- Incentivise circular economies and keep more of the food each EU member state produces within their own states; and,
- Address the problem of food overproduction and food overconsumption.

Systemic behavioural change within wider society can also address the overall problem of waste production on a consumer level. Take the example of a 4-day work week, and Sunday closures for non-essential businesses. When people

have more time to relax, engage in hobbies and pastimes, feel truly connected to loved ones, and practise self-care, we adopt more sustainable, healthy behaviours. A 4-day work week – which prioritises quality of life over GPD growth – increases opportunities for the average person to change behaviours that align with, for example, the UN's SDGs, and living a more sustainable lifestyle: More time and personal energy, leading to less stress, less 'stress-eating' and 'stress-buying', less over-consumption and less waste produced overall.[66] [67]

# 4. Concluding Summary of Our Observations

Zero Waste Alliance Ireland welcomes the European Commission's assessment of Member States' progress towards the 2030 waste targets. Problems we have identified in earlier assessments of Ireland's waste management performance and our previous policy submissions on topics of waste remain evident. With limited time remaining, existing commitments must translate into effective implementation, enforcement and investment. We regard the EU targets as minimum requirements rather than the limit of ambition.

- **Waste prevention must guide the transition to a circular economy:** Progress cannot be measured solely by the quantities of waste recycled or diverted from landfill. Reducing total waste generation, preventing non-recyclable waste, extending product lifetimes and retaining materials in use must take priority. These measures also support the EU's objectives for climate neutrality, zero pollution, biodiversity protection, resource security and human health.

- **Ireland's municipal waste performance demonstrates the need for substantial intervention:** The figures presented in this submission show that Ireland's recycling figures remain substantially below the 55% target for 2025. Reduced landfilling is welcome, but continued reliance on incineration cannot substitute for prevention, preparation for reuse and recycling.

- **Separate collection at source must be improved:** Households and businesses should separate recyclable materials, food and organic waste, and residual waste where these arise. This requires suitable bins, accessible collection services, clear information and effective compliance checks. The continued presence of substantial quantities of recyclable and organic materials in residual bins demonstrates that current arrangements are failing to capture valuable resources.

[66] https://fourdayweek.ie/about/

[67] Kelly, O. (2024). *The 4-day week: making work healthier and more sustainable*. https://www.ucd.ie/research/impact/casestudies/the4-dayweekmakingworkhealthierandmoresustainable/

- **Investment must support recycling and bio-waste treatment:** Ireland needs better collection coverage, recycling facilities, sorting systems, composting and anaerobic digestion capacity, alongside support for home composting. Reliance on mixed collections, subsequent sorting and exports should be addressed through stronger domestic systems that recover materials effectively and preserve their quality.

- **Economic measures and producer responsibility must reinforce the waste hierarchy:** Charges, levies, incentives and investment should encourage prevention, reuse and recycling while reducing dependence on landfill and incineration. Extended Producer Responsibility should make producers accountable for the waste associated with their products and packaging. Ireland's Deposit and Return Scheme provides a basis for progress, but its limited coverage should be extended to other packaging types.

- **Repair, reuse and public education require sustained support:** Repair services, reuse centres, repair cafés, second-hand markets, sharing schemes and reusable packaging systems can keep products and materials in circulation. Public awareness programmes should explain how to prevent waste, segregate materials, reduce food waste and use these services. Education must be accompanied by the infrastructure and practical opportunities needed to act on it.

- **Landfill policy must protect communities and future generations:** Although modern landfills operate under stronger environmental controls, potential impacts include odours, pollutants, vermin, traffic, contamination and reduced enjoyment of people's homes. These burdens must not fall disproportionately on disadvantaged communities. Precaution, effective regulation and continuous monitoring remain necessary because environmental risks can persist long after disposal.

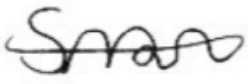
- **Food waste prevention requires reform throughout the food system:** Our submission argues that measures directed at consumers or discarded food alone cannot resolve the waste associated with overproduction, concentrated corporate power and unsustainable production and distribution. European action should support equitable, local and circular food systems, smaller producers, farmers' markets and regenerative farming. More food should remain within the countries where it is produced, reducing dependence on extensive import and export chains.

- **Meat overproduction and overconsumption, as well as the persistence of ultra-processed foods must be addressed:** Food waste policy should consider how production and consumption patterns generate environmental damage and waste resources before food reaches the point of disposal.

- **Excessive packaging must be prevented through enforceable obligations:** Ireland and other Member States must fully implement their existing obligations on single-use plastics. Producers should be required to eliminate unnecessary packaging, particularly plastic food packaging, with consequences for non-compliance sufficient to change corporate practices. We also recommend restrictions on non-recyclable or non-biodegradable packaging, movement towards compostable alternatives wherever possible, and expanded recycling facilities and bring-banks, including provision funded by producers.

- **Wider social conditions should support less wasteful consumption:** Our submission identifies a four-day working week and Sunday closures for non-essential businesses as measures that could give people more time for relationships, wellbeing and sustainable everyday practices. Reducing the pressures associated with stress-driven purchasing, eating and overconsumption should form part of a broader approach that prioritises quality of life alongside environmental protection.

The priority is to prevent waste at its source, implement the waste hierarchy, address unsustainable production and consumption, and protect affected communities. Early Warning Reports and Environmental Implementation Reviews should drive practical changes that reduce waste and pollution, retain resources in circulation and advance a fair transition towards zero waste.



Sara Guigui

Coordinator

**Zero Waste Alliance Ireland**

26 October 2026

This submission was researched and written by Christine Neer (ZWAI member), Kausa Kasongo (ZWAI member), and Jack O'Sullivan (ZWAI founder and Vice-chair), with editing by Sara Guigui (ZWAI Coordinator) and Jack O'Sullivan.

ZWAI-EWW-05 Submission text, final, 26-Oct-2026.docx

Appendix I



# Waste – early warning report 2027



**In preparation**

**Call for evidence**

Feedback period

28 September 2026 - 26 October 2026

Feedback: Open

**Upcoming**

**Commission adoption**

Planned for

Fourth quarter 2027

## About this initiative

**Summary**

The Commission will assess Member States' progress towards the 2030 targets for packaging waste reduction, municipal waste preparing for re-use and recycling and packaging waste recycling, the different packaging material recycling targets and food waste reduction targets.

It will also assess progress towards the 2035 target for municipal waste landfill, identifying Member States at risk of not meeting these targets and providing them with recommendations to improve their performance.

**Topic** Environment

**Type of act** Report

## Call for evidence

Feedback: Open

### Feedback period

28 September 2026 - 26 October 2026 (midnight Brussels time)

European Commission

# Appendix II

Law

## Feedback from: Zero Waste Alliance Ireland

Have your say - Public Consultations and Feedback > Published initiatives > Waste – early warning report 2

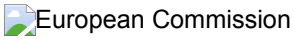
| | |
|---|---|
| **Feedback reference** | F33580288 |
| **Submitted on** | 26 October 2026 |
| **Submitted by** | Jack O'Sullivan |
| **User type** | Environmental organisation |
| **Organisation** | Zero Waste Alliance Ireland |
| **Organisation size** | Micro (1 to 9 employees) |
| **Transparency register number** | 417362640092-95 |
| **Country of origin** | Ireland |
| **Initiative** | Waste – early warning report 2027 |

Gmail

# Appendix II a

## 'Have your say' - Acknowledgement of receipt

**European Commission - 'Have your say'** <DO-NOT-REPLY@ec.europa.eu> 26 October 2026 at 22:50
To: jack@zwai.ie




Have your say

Dear Sir or Madam,

Thank you for submitting your feedback on Have your say.

We acknowledge receipt of your feedback which may be used to improve the proposed legislation.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/17712-Afval – verslag vroegtijdige waarschuwing 2027/F33580288_en

To make corrections, you can unpublish your feedback and send a new one, if the feedback period is still open.

This is an automatic notification message. Please do not reply to it.

With kind regards,

**European Commission**
Secretariat-General