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OPERATIONAL WASTE MANAGEMENT PLAN FOR A PROPOSED COMMERCIAL DEVELOPMENT AT 1 NORTH WALL QUAY, DUBLIN 1, D01 T8Y1

APPENDIX 13.2

Report Prepared For

NWQ Devco Ltd.

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1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Operational Waste Management Plan (OWMP) on behalf of NWQ Devco Ltd. The proposed development provides for the demolition of the existing building and construction of a new building ranging in height from 9 no. to 17 no. storeys over lower ground floor and double basement comprising of office accommodation, arts/community/cultural uses and a retail/café/restaurant unit.

This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed Development is undertaken in accordance with the current legal and industry standards including, the Waste Management Act 1996 as amended and associated Regulations ¹, Environmental Protection Agency Act 1992 as amended ², Litter Pollution Act 1997 as amended ³, the *Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021*, ⁴, the Draft National Waste Management Plan for a Circular Economy (NWMPCE) (2023) ⁵ and Dublin City Council (DCC) 'Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws' 2018 ⁶. In particular, this OWMP aims to provide a robust strategy for the storage, handling, collection and transport of the wastes generated at Site.

This OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources). The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.

At present, there are no specific national guidelines in Ireland for the preparation of OWMPs. Therefore, in preparing this document, consideration has been given to the requirements of national and regional waste policy, legislation and other guidelines.

2.0 OVERVIEW OF WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Irish Government issued a policy statement in September 1998 titled as 'Changing *Our Ways*' ⁷ which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. A heavy emphasis was placed on reducing reliance on landfill and finding alternative methods for managing waste. Amongst other things, Changing Our Ways stated a target of at least 35% recycling of municipal (i.e. household, commercial and non-process industrial) waste.

A further policy document '*Preventing and Recycling Waste – Delivering Change*' was published in 2002 ⁸. This document proposed a number of programmes to increase recycling of waste and allow diversion from landfill. The need for waste minimisation at source was considered a priority.

This view was also supported by a review of sustainable development policy in Ireland and achievements to date, which was conducted in 2002, entitled *'Making Irelands Development Sustainable – Review, Assessment and Future Action'*⁹. This document also stressed the need to break the link between economic growth and waste generation, again through waste minimisation and reuse of discarded material.

In order to establish the progress of the Government policy document *Changing Our Ways*, a review document was published in April 2004 entitled *'Taking Stock and*

*Moving Forward*⁷¹⁰. Covering the period 1998 – 2003, the aim of this document was to assess progress to date with regard to waste management in Ireland, to consider developments since the policy framework and the local authority waste management plans were put in place, and to identify measures that could be undertaken to further support progress towards the objectives outlined in *Changing Our Ways*.

In particular, *Taking Stock and Moving Forward* noted a significant increase in the amount of waste being brought to local authority landfills. The report noted that one of the significant challenges in the coming years was the extension of the dry recyclable collection services.

In September 2020, the Irish Government published a policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan 'A Waste Action Plan for a Circular Economy' ¹¹ (WAPCE), was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to a new economy, where climate and environmental challenges are turned into opportunities, replacing the previous national waste management plan "A Resource Opportunity" (2012).

The WAPCE sets the direction for waste planning and management in Ireland up to 2025. This reorientates policy from a focus on managing waste to a much greater focus on creating circular patterns of production and consumption. Other policy statements of a number of public bodies already acknowledge the circular economy as a national policy priority.

The policy document contains over 200 measures across various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

One of the first actions to be taken was the development of the Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less' (2021) ¹² to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021. It is anticipated that the Strategy will be updated in full every 18 months to 2 years.

The Circular Economy and Miscellaneous Provisions Act 2022 ¹³ was signed into law in July 2022. The Act underpins Ireland's shift from a "take-make-waste" linear model to a more sustainable pattern of production and consumption, that retains the value of resources in our economy for as long as possible and that will work to significantly reduce our greenhouse gas emissions. The Act defines Circular Economy for the first time in Irish law, incentivises the use of recycled and reusable alternatives to wasteful, single-use disposable packaging, introduces a mandatory segregation and incentivised charging regime for commercial waste, streamlines the national processes for End-of-Waste and By-Products decisions, tackling the delays which can be encountered by industry, and supporting the availability of recycled secondary raw materials in the Irish market, and tackles illegal fly-tipping and littering.

Since 1998, the Environmental Protection Agency (EPA) has produced periodic *National Waste (Database) Reports*' which as of 2023 have been renamed *Circular Economy and Waste Statistics Highlight Reports*¹⁴ detailing, among other things, estimates for household and commercial (municipal) waste generation in Ireland and the level of recycling, recovery and disposal of these materials. The 2021 National Circular Economy and Waste Statistics web resource, which is the most recent study published, along with the national waste statistics web resource (November 2023) reported the following key statistics for 2020:

- **Generated** Ireland produced 3,170,000 t of municipal waste in 2021. This is a 1% decrease since 2020. This means that the average person living in Ireland generated 630 kg of municipal waste in 2021.
- **Managed** Waste collected and treated by the waste industry. In 2020, a total of 3,137,000 t of municipal waste was managed and treated.
- **Unmanaged** An estimated 33,000 tonnes of this was unmanaged waste i.e., not disposed of in the correct manner in 2021.
- **Recovered** The amount of waste recycled, used as a fuel in incinerators, or used to cover landfilled waste. In Ireland 42% of Municipal waste was treated by energy recovery through incineration in 2021.
- **Recycled** Just over 1.3 million tonnes of municipal waste generated in Ireland was recycled in 2021, resulting in a recycling rate of 41 per cent. The recycling rate remains unchanged from 2020 and indicates that we face significant challenges to meet the upcoming EU recycling targets of 55% by 2025 and 65% by 2035.
- **Disposed** The proportion of municipal waste sent to landfill also remains unchanged at 16% the same as 2020.
- **Reuse** 54,800 tonnes of second-hand products we estimated by the EPA to have been reused in Ireland in 2021. The average annual Reuse rate per person in Ireland is 10.6 kg per person.

2.2 Regional Level

The proposed Development is located in the Local Authority administrative area of Dublin City Council (DCC).

The EMR Waste Management Plan 2015 – 2021 is the regional waste management plan for the DCC area which was published in May 2015. Currently the EMR and other regional waste management plans are under review and the Regional Waste Management Planning Offices have issued a Draft NWMPCE in June 2023.

The regional plan sets out the following strategic targets for waste management in the region that are relevant to the proposed development:

- A 1% reduction per annum in the quantity of household waste generated per capita over the period of the plan;
- Achieve a recycling rate of 50% of managed municipal waste by 2020; and
- Reduce to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices.

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €140-160 per tonne of waste, which includes a €85 per tonne landfill levy introduced under the Waste Management (Landfill Levy) (Amendment) Regulations 2015 (as amended).

The Draft NWMPCE does not dissolve the three regional waste areas. The NWCPCE sets the ambition of the plan to have a 0% total waste growth per person over the life of the Plan with an emphasis on non-household wastes including waste from commercial activities and the construction and demolition sector.

The draft NWMPCE sets out the following strategic targets for waste management in the region that are relevant to the proposed development:

1a. (Residual Municipal Waste) 1% Reduction / person /year – Waste decline for landfill or recovery by thermal treatment.

2. (Contamination of Materials) 90% of Material in Compliance – Contamination of recycling and food waste with other materials

3a. (Reuse of Materials) 10kg Per person / year – Reuse of materials like cloths or furniture to prevent waste.

The *Dublin City Development Plan 2022 – 2028*¹⁵ sets out a number of policies and objectives for Dublin City in line with the objectives of the National climate action policy and emphasises the need to take action to address climate action across all sectors of society and the economy. In the waste sector, policy on climate action is focused on a shift towards a 'circular economy' encompassing three core principles: designing out waste and pollution; keeping products and material in use; and regenerating natural systems. Further policies and objectives can be found within the development plan.

Policies:

- CA8 F: minimising the generation of site and construction waste and maximising reuse or recycling.
- CA23: The Circular economy: To support the shift towards the circular economy approach as set out in 'a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, or as updated.
- CA24: To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.
- SI27: Sustainable Waste Management: To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.
- SI28: To prevent and minimise waste generation and disposal, and to prioritise prevention, recycling, preparation for reuse and recovery in order to develop Dublin as a circular city and safeguard against environmental pollution.
- SI29: Segregated Storage and Collection of Waste Streams: To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate.
- SI30: To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).

Objectives:

- SIO14 Local Recycling Infrastructure: To provide for a citywide network of municipal civic amenity facilities/ multi-material public recycling and reuse facilities in accessible locations throughout the city in line with the objectives of the circular economy and 15 minute city.
- SIO16 Eastern-Midlands Region Waste Management Plan: To support the implementation of the Eastern-Midlands Regional Waste Management Plan 2015–2021 and any subsequent plans in order to facilitate the transition from a waste management economy towards a circular economy.

2.3 Legislative Requirements

The primary legislative instruments that govern waste management in Ireland and applicable to the proposed development are:

- Waste Management Act 1996, as amended;
- Environmental Protection Agency Act 1992 as amended;
- Litter Pollution Act 1997 as amended and
- Planning and Development Act 2000 as amended ¹⁶
- Circular Economy and Miscellaneous Provisions Act 2022.

These Acts and subordinate Regulations transpose the relevant European Union Policy and Directives into Irish law.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the Waste Management Act 1996 as amended and subsequent Irish legislation, is the principle of "Duty of Care". This implies that the waste producer is responsible for waste from the time it is generated through until its legal disposal (including its method of disposal). As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final disposal area, waste contractors will be employed to physically transport waste to the final waste disposal site.

It is, therefore, imperative that the tenants and the proposed facilities management company undertake on-site management of waste in accordance with all legal requirements and that the facilities management company employ suitably permitted / licenced contractors to undertake off-site management of their waste in accordance with all legal requirements. This includes the requirement that a waste contactor handle, transport and reuse / recover / recycle / dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the Waste Management (Facility Permit & Registration) Regulations 2007, as amended, or a Waste or Industrial Emissions (IE) Licence granted by the EPA. The COR / permit / licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and / or disposed of at the specified site.

2.3.1 Dublin City Council Waste Management Bye-Laws

The DCC "Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018)" were bought into force in May 2019. These bye-laws repeal the previous Bye-Laws for the Storage, Presentation and Collection of Household and Commercial Waste. The bye-laws set a number of enforceable requirements on waste holders with regard to storage, separation and presentation of waste within the DCC administrative area. Key requirements under these bye-laws of relevance to the operational phase of the proposed development include the following:

- Kerbside waste presented for collection shall not be presented for collection earlier than 5.00 pm on the day immediately preceding the designated waste collection day;
- All containers used for the presentation of kerbside waste and any uncollected waste shall be removed from any roadway, footway, footpath or any other public place no later than 10:00 am on the day following the designated waste

collection day, unless an alternative arrangement has been approved in accordance with bye-law 2.3;

- Documentation, including receipts, is obtained and retained for a period of no less than one year to provide proof that any waste removed from the premises has been managed in a manner that conforms to these bye-laws, to the Waste Management Act and, where such legislation is applicable to that person, to the European Union (Household Food Waste and Bio-Waste) Regulations 2015; and
- Adequate access and egress onto and from the premises by waste collection vehicles is maintained.

The full text of the bye-laws is available from the DCC website.

2.4 Regional Waste Management Service Providers and Facilities

Various contractors offer waste collection services for the commercial sector in the DCC region. Details of waste collection permits (granted, pending and withdrawn) for the region are available from the NWCPO.

As outlined in the regional waste management plan, there is a decreasing number of landfills available in the region. Only three municipal solid waste landfills remain operational and all are operated by the private sector. There are a number of other licensed and permitted facilities in operation in the region including waste transfer stations, hazardous waste facilities and integrated waste management facilities. There are two existing thermal treatment facilities, one in Duleek, Co. Meath and a second in Poolbeg in Dublin.

A copy of all CORs and waste permits issued by the Local Authorities are available from the NWCPO website and all Waste / Industrial Emissions Licenses issued are available from the EPA.

3.0 DESCRIPTION OF THE DEVELOPMENT

3.1 Location, Size and Scale of the Development

The proposed development provides for the demolition of the existing building and construction of a new building ranging in height from 9 no. to 17 no. storeys over lower ground floor and double basement comprising of office accommodation, arts/community/cultural uses and a retail/café/restaurant unit. Office accommodation is provided from lower ground floor to 15th floor level, arts/community/cultural uses are provided at lower ground, ground, 1st and 16th floor level with a retail/café/restaurant unit at ground floor level. Landscaped terraces are located at 8th, 9th, 10th, 11th, 15th, 16th floor level with winter terraces located at 4th, 6th 9th floor level. Provision of a new landscaped street to the east of the building to include external arts/community/cultural uses. The double basement comprises 30 no. car parking spaces, 923 no. bicycle parking spaces and 6 no. motorbike spaces as well as shower/changing facilities and plantroom.

3.2 Typical Waste Categories

The typical non-hazardous and hazardous wastes that will be generated at the proposed development will include the following:

• Dry Mixed Recyclables (DMR) - includes waste paper (including newspapers, magazines, brochures, catalogues, leaflets), cardboard and plastic packaging, metal cans, plastic bottles, aluminium cans, tins and Tetra Pak cartons;

- Organic waste food waste and green waste generated from internal plants / flowers;
- Glass; and
- Mixed Non-Recyclable (MNR)/General Waste.

In addition to the typical waste materials that will be generated at the development on a daily basis, there will be some additional waste types generated less frequently / in smaller quantities which will need to be managed separately including:

- Green / garden waste may be generated from internal plants / flowers;
- Batteries (both hazardous and non-hazardous);
- Waste electrical and electronic equipment (WEEE) (both hazardous and nonhazardous);
- Printer cartridges / toners;
- Chemicals (paints, adhesives, resins, detergents, etc.);
- Light bulbs;
- Textiles;
- Waste cooking oil (if any generated by the tenants);
- Furniture (and, from time to time, other bulky wastes); and
- Abandoned bicycles.

Wastes should be segregated into the above waste types to ensure compliance with waste legislation and guidance while maximising the re-use, recycling and recovery of waste with diversion from landfill wherever possible.

3.3 European Waste Codes

In 1994, the *European Waste Catalogue*¹⁷ and *Hazardous Waste List*¹⁸ were published by the European Commission. In 2002, the EPA published a document titled the *European Waste Catalogue and Hazardous Waste List*¹⁹, which was a condensed version of the original two documents and their subsequent amendments. This document has recently been replaced by the EPA '*Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous'*²⁰, applicable since the 1st June 2015. This waste classification system applies across the EU and is the basis for all national and international waste reporting, such as those associated with waste collection permits, CORs, permits and licences and the EPA National Waste Database.

Under the classification system, different types of wastes are fully defined by a code. The List of Waste (LoW) code for typical waste materials expected to be generated during the operation of the proposed development are provided in Table 3.1, below.

Waste Material	LoW Code
Paper and Cardboard	20 01 01
Plastics	20 01 39
Metals	20 01 40
Mixed Non-Recyclable Waste	20 03 01
Glass	20 01 02
Biodegradable Kitchen Waste	20 01 08
Oils and Fats	20 01 25
Textiles	20 01 11
Batteries and Accumulators*	20 01 33* - 34
Printer Toner/Cartridges*	20 01 27* - 28
Green Waste	20 02 01
WEEE*	20 01 35*-36

 Table 3.1
 Typical Waste Types Generated and LoW Codes

Chemicals (solvents, pesticides, paints & adhesives, detergents, etc.) *	20 01 13*/19*/27*/28/29*30		
Fluorescent tubes and other mercury containing waste *	20 01 21*		
Bulky Wastes	20 03 07		

* Individual waste type may contain hazardous materials

4.0 ESTIMATED WASTE ARISINGS

A waste generation model (WGM) developed by AWN has been used to predict waste types, weights and volumes expected to arise from operations within the proposed development. The WGM incorporates building area and use and combines these with other data, including Irish and US EPA waste generation rates.

The floor area usage (m^2) has been used to estimate the waste arising from the office, community / arts and retail units.

The estimated waste generation for the proposed development for the main waste types is presented in Table 4.1.

	Waste Volume (m ³ / week)			
Waste Type	Office Units (Combined)			
Organic Waste	13.34	0.27	0.19	
Paper (Confidential)	9.33	-	-	
Cardboard (Baled)	50.19	-	-	
Plastic (Baled)	51.31	-	-	
DMR	52.33	5.27	0.46	
Glass	1.21	0.15	<0.01	
MNR	61.75	2.20	0.59	
Total	239.45	7.61	1.25	

 Table 4.1
 Estimated Waste Generation for the Proposed Development

*BS5906:2005 Waste Management in Buildings – Code of Practice*²¹ has been considered in the calculations of waste estimates. AWN's modelling methodology is based on recently published data and data from numerous other similar developments in Ireland and is based on AWN's experience, it provides a more representative estimate of the likely waste arisings from the proposed development.

5.0 WASTE STORAGE AND COLLECTION

This section provides information on how waste generated within the site will be stored and collected. This has been prepared with due consideration of the proposed site layout as well as best practice standards, local and national waste management requirements, including those of DCC. In particular, consideration has been given to the following documents:

- BS 5906:2005 Waste Management in Buildings Code of Practice,
- EMR Waste Management Plan 2015 2021;
- Dublin City Council Development Plan 2022 2028;
- DCC Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018); and

5.1 Waste Storage Areas

Two (2 no.) Waste Storage Areas (WSA) have been allocated in the design of the development. The WSAs are located at basement (-1) level.

<u>Office</u>

One (1 no.) Waste Storage Area (WSA) has been allocated in the design of the development. The WSA is located at basement (-1) level.

Community / Arts and Retail units

One (1 no.) Waste Storage Area (WSA) has been allocated in the design of the development. The WSA is located at basement (-1) level.

Using the estimated waste generation volumes in Tables 4.1, above, the waste receptacle requirements for MNR, DMR, paper & cardboard, plastic, organic waste and glass have been established for the WSA. It is envisaged that DMR, MNR, baled paper & cardboard, baled plastic, organic waste will be collected on a three times per week basis, while glass will be collected on a weekly basis. It is envisaged that confidential paper will be collected as required by the office tenants.

Waste Storage Requirements

Estimated waste storage requirements for the operational phase of the proposed development are detailed in Table 5.1, below. The WSA has been appropriately sized to accommodate the schedule waste requirements for waste receptacles.

Area/Use	Bins Required					Equipmont
Area/Use	MNR ¹	DMR ²	Glass	Organic	Bales	Equipment
Community / Arts and Retail units (Combined)	1 x 1100L	2 x 1100L	1 x 120L	1 x 240L	N/A	N/A
Office WSA (Combined)	21 x 1100L	16 x 1100L	5 x 240L	19 x 240L	27	Bramidan B3 Baler;
						1 no. Roll Cage;
						WEEE / Battery / Printer Cartridges Box

Table 5.1Waste storage requirements for the proposed development

Note: 1 = Mixed Non-Recyclables

2 = Dry Mixed Recyclables

The waste receptacle requirements have been established from distribution of the total weekly waste generation estimate into the holding capacity of each receptacle type. Waste storage receptacles as per Table 5.1, above, (or similar appropriate approved containers) will be provided by the facilities management company in the WSA.

As outlined in the current Dublin City Development, it is preferable to use 1,100 L wheelie bins for waste storage, where practical. However, in the case of organic and glass waste, it is considered more suitable to use smaller waste receptacles due to the

weight of bins when filled with organic and glass waste. The use of 240 L bins, as recommended in Table 5.1, will reduce the manual handling impacts on the facilities management personnel and waste contractor employees.

The types of bins used will vary in size, design and colour dependent on the appointed waste contractor. However, examples of typical receptacles to be provided in the WSA are shown in Figure 5.1. All waste receptacles used will comply with the SIST EN 840-1:2020 and SIST EN 840-2:2020 standards for performance requirements of mobile waste containers, where appropriate.



Figure 5.1 Typical waste receptacles of varying size (240 L and 1100 L)

It is proposed that facilities management will avail of a commercially available baler for the cardboard and plastic waste streams in the office WSA, referred to as a Bramidan B3 Baler in this OWMP. This option will significantly reduce the volume of waste and as such the number of bins stored on site and the number of bins that will need to be transported for collection. It compresses/compacts the waste into 0.23m³ bales.

Alternative options can be considered in future by the facilities management company, as technologies are developed. Solely for the purpose of ensuring the WSA is sufficiently sized, this plan assumes that the baler option will be utilised. A photo of a Bramidan B3 baler is provided as Figure 5.2, below.



Figure 5.2 Bramidan B3 Baler (Source: Greenbank Recycling website)

Receptacles for DMR, MNR, organic and glass waste will be provided in the WSA prior to first occupation of the development i.e. prior to the first commercial units being occupied.

This Plan will be provided to all tenants from first occupation of the development i.e. once the units are occupied. This Plan will be supplemented, as required, by the facilities management company with any new information on waste segregation, storage, reuse and recycling initiatives that are subsequently introduced.

5.2 Waste Storage – Office Units

The office tenant(s) will segregate waste into the following main waste streams:

- DMR;
- MNR;
- Organic waste;
- Glass;
- Cardboard (for baling);
- Plastic packaging (for baling); and
- Confidential Paper

The office units will have a WSA located at basement (-1) level.

It is recommended that the office tenants implement the 'binless office' concept where employees do not have bins located under desks and instead bring their waste to Area Waste Stations (AWSs) located strategically on the office floors, at print stations/rooms and at any canteens, micro kitchens or tea stations which may be provided within the tenant's office space. Experience has shown that the maximum travel distance should be no more than 15m from the employee's desk to the AWS. This 'best in class' concept achieves maximum segregation of waste in an office setting.

The binless office concept, in addition to assisting in maximising recycling rates and minimising associated landfill disposal costs, also has the advantage of substantially reducing cleaning costs, as cleaners visit only the AWSs on each floor, as opposed to each desk.

Typically, an AWS would include a bin for DMR and a bin for MNR. It is recommended that a confidential paper bin with a locked lid/door should also be provided for at each AWS and/or adjacent to photocopy/printing stations, as required. In addition, it is recommended that organic and glass bins will be provided at any canteens or micro kitchens or tea stations, where appropriate.

A printer cartridge/toner bin should be provided at the print/copy stations, where appropriate.

It is recommended that all bins will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted on or above the bins to show which wastes can be put in each bin.

Canteen/restaurants are provided within the office development, these will generate additional waste volumes on a daily basis, primarily organic waste from food preparation/leftovers and possible waste cooking oil and waste sludge. The kitchen is also likely to generate extra packaging waste material such as cardboard and plastic from decanting of goods received. The estimated waste volumes in Table 4.1 include for waste from a full canteen/restaurant.

Kitchens are allocated in the proposed development. These areas will contribute a significant portion of the volume of waste generated on a daily basis, and as such it is

important that adequate provision is made for the storage and transfer of waste from these areas to the WSA.

It is anticipated that waste will be generated in kitchens throughout the day, primarily at the following locations:

- Food Storage Areas (i.e. cold stores, dry store, freezer stores and stores for decanting of deliveries);
- Meat Preparation Area;
- Vegetable Preparation Area;
- Cooking Area; and
- Dish-wash and Glass-wash Area.

Small bins will be placed adjacent to each of these areas for temporary storage of waste generated during the day. Waste will then be transferred from each of these areas to the appropriate waste store within the kitchen / food outlet areas.

Suppliers for the tenants will be requested by the tenants to make deliveries in reusable containers, minimise packaging and/or to remove any packaging after delivery where possible, to reduce waste generated by the development.

Personnel nominated by the office tenants will empty the bins in the AWSs, as required, and bring the segregated waste using trolleys/carts/bins via lifts to the WSA located at basement (-1) level.

It is proposed that confidential paper waste will be managed separately to nonconfidential paper waste. Tenants will be required to engage with an appropriately permitted/licenced confidential waste management contractor for collection and shredding of confidential paper. It is anticipated that tenants will place locked confidential waste paper bins as required throughout their office areas. The confidential waste company will typically collect bins directly from the office areas, under agreement with the tenant, and bring the locked bin or bags of confidential waste via the lifts to their collection truck. It is envisaged that confidential paper waste will be shredded on-site in the dedicated collection truck or bought to an authorised facility for offsite shredding.

Other waste materials such as textiles, batteries, lightbulbs and printer toner / cartridges will be generated less frequently. The office tenants will be required to identify suitable temporary storage areas for these waste items within their own units and transfer them to the WSA as required. Waste Electric and Electron Equipment (WEEE) can be placed in the receptacle provided in the WSA. Collections of these items will be arranged as required by the tenant or facilities management depending on the agreement. Further details on additional waste types can be found in Section 5.5.

5.3 Waste Storage – Community / Arts and Retail units

The Community / Arts and Retail unit tenants will be required to segregate waste within their own units into the following main waste types:

- DMR;
- MNR;
- Organic waste; and
- Glass;

As required, the staff will need to bring segregated DMR, MNR, glass and organic waste to their allocated WSA at basement (-1) level.

Suppliers for the commercial tenants should be requested by the tenants to make deliveries in reusable containers, minimize packaging or remove any packaging after delivery, where possible, to reduce waste generated by the Development.

All bins / containers in the tenants' areas as well as in the WSA will be clearly labelled and colour coded to avoid cross contamination of the different waste streams. Signage will be posted above or on the bins to show exactly which wastes can be put in each.

Other waste materials such as textiles, batteries, printer toner / cartridges, light bulbs, cooking oil, green waste, chemicals, bulky items and WEEE will be generated less frequently. The tenant will be required to store these waste types within their own unit and arrange collection with an appropriately licensed waste contractor. Facilities management may arrange collection, depending on the agreement. Further details on additional waste types can be found in Section 5.5.

5.4 Waste Collection

There are numerous private contractors that provide waste collection services in the Dublin City area. All waste contractors servicing the proposed development must hold a valid waste collection permit for the specific waste types collected. All waste collected must be transported to registered / permitted / licensed facilities only.

Bins/bales from the proposed development will be collected at ground floor level, on the north west side of the proposed development. Bins/bales will be transported from the WSA at basement (-1) level to ground floor level using a designated bin lift, where they will be emptied into the waste truck. There will be no staging area provided and bins/bales will be bought to grade for collection at the time of arrival of the waste collection vehicle to minimise the impact on pedestrians.

A trolley / tug or suitable vehicle may be required to convey the bins/bales to and from the collection point. The waste contractor / facilities management will ensure that empty bins are promptly returned to the WSA after collection / emptying.

Suitable access and egress has been provided to enable the bins/bales to be moved easily from the WSA to the waste collection vehicles on the appropriate days. Waste will be collected at agreed days and times by the nominated waste contractors.

All waste receptacles should be clearly identified as required by waste legislation and the requirements of the DCC *Waste Bye-Laws*. Waste will be presented for collection in a manner that will not endanger health, create a risk to traffic, harm the environment or create a nuisance through odours or litter.

It is recommended that bin collection times are staggered to reduce the number of bins required to be emptied at once and the time the waste vehicle is on-site. This will be determined during the process of appointment of a waste contractor.

5.5 Additional Waste Materials

In addition to the typical waste materials that are generated on a daily basis, there will be some additional waste types generated from time to time that will need to be managed separately. A non-exhaustive list is presented below.

Green Waste

Green waste may be generated from internal plants / flowers. Green waste generated from internal plants / flowers can be placed in the organic waste bins. If substantial external green waste is produced by tenants or from any external landscaping it can be removed by a landscape contractor.

<u>Batteries</u>

A take-back service for waste batteries and accumulators (e.g. rechargeable batteries) is in place in order to comply with the Waste Management Batteries and Accumulators Regulations 2014 as amended. Waste batteries must be separately collected for recycling and recovery of resources and the tennants are responsible for arranging and financing this. The tenants must segregate their waste batteries and either avail of the take-back service provided by retailers or arrange for recycling / recovery of their waste batteries by a suitably permited / licenced contractor. Facilities management may arrange collection, depending on the agreement.

Waste Electrical and Electronic Equipment (WEEE)

The WEEE Directive 2002/96/EC and associated Waste Management (WEEE) Regulations 2014 have been enacted to ensure a high level of recycling of electronic and electrical equipment. It is the manufacturers' responsibility to take back the WEEE, regardless of whether a replacement product is purchased or not and retailers are required to take back WEEE where a similar product is purchased. The tenants must segregate their WEEE and either avail of the take-back / collection service provided by retailers or arrange for recycling / recovery of their WEEE by a suitably permited / licenced contractor. Facilities management may arrange collection, depending on the agreement.

Printer Cartridge / Toners

It is recommended that a printer cartridge / toner bin is provided in the units, where appropriate. The tenants will be required to store this waste within their unit and arrange for return to retailers or collection by an authorised waste contractor, as required.

Chemicals

Chemicals (such as solvents, paints, adhesives, resins, detergents, etc) are largely generated from building maintenance works. Such works are usually completed by external contractors who are responsible for the off-site removal and appropriate recovery / recycling / disposal of any waste materials generated.

Any waste cleaning products or waste packaging from cleaning products generated in the units that is classed as hazardous (if they arise) will be appropriately stored within the tenants' own space. Facilities management may arrange collection, depending on the agreement.

Light Bulbs

Waste light bulbs (fluorescent, incandescent and LED) may be generated by lighting at the units. It is anticipated that tenants will be responsible for the off-site removal and appropriate recovery / disposal of these wastes. Facilties management may arrange collection, depending on the agreement.

<u>Textiles</u>

Where possible, waste textiles should be recycled or donated to a charity organisation for reuse. The tenants will be responsible for disposing of waste textiles appropriately.

Waste Cooking Oil

If the tenants use cooking oil, waste cooking oil will need to be stored within the unit on a bunded area or spill pallet and regular collections by a dedicated waste contractor will need to be organised as required. Under sink grease traps will be installed in any cooking space.

Furniture & Other Bulky Waste Items

Furniture and other bulky waste items (such as carpet, etc.) may occasionally be generated by the tenants. The collection of bulky waste will be arranged, as required by the tenants.

Abandoned Bicycles

Bicycle parking areas are planned for the development. As happens in other developments, users of the building sometimes abandon faulty or unused bicycles, and it can be difficult to determine their ownership. Abandoned bicycles should be donated to charity if they arise or facilities management may arrange collection by a licensed waste contractor.

5.6 Waste Storage Area Design

The WSA will be designed and fitted-out to meet the requirements of relevant design standards, including:

- Be fitted with a non-slip floor surface;
- Provide ventilation to reduce the potential for generation of odours with a recommended 6-10 air changes per hour for a mechanical system for internal WSAs;
- Provide suitable lighting a minimum Lux rating of 400 is recommended;
- Be easily accessible for people with limited mobility;
- Be restricted to access by nominated personnel only;
- Be supplied with hot or cold water for disinfection and washing of bins;
- Be fitted with suitable power supply for power washers;
- Have a sloped floor to a central foul drain for bins washing run-off;
- Have appropriate signage placed above and on bins indicating correct use;
- Have access for potential control of vermin, if required; and
- Be fitted with CCTV for monitoring.

The facilities management company and tenants will be required to maintain the bins and storage areas in good condition as required by the DCC Waste Bye-Laws.

6.0 CONCLUSIONS

In summary, this OWMP presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the proposed development.

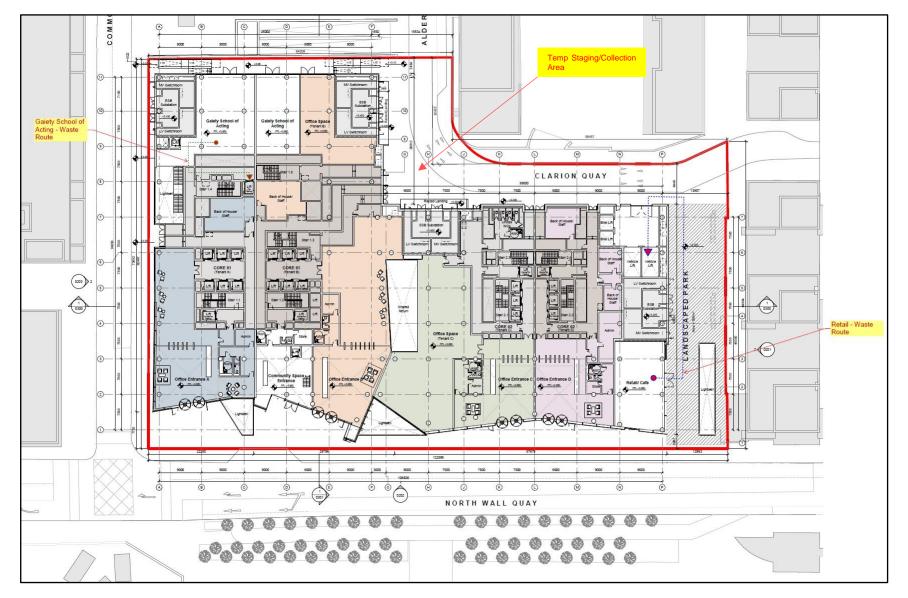
Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus contributing to the targets set out in the *EMR Waste Management Plan 2015 – 2021*.

Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements of the *DCC Waste Bye-Laws*.

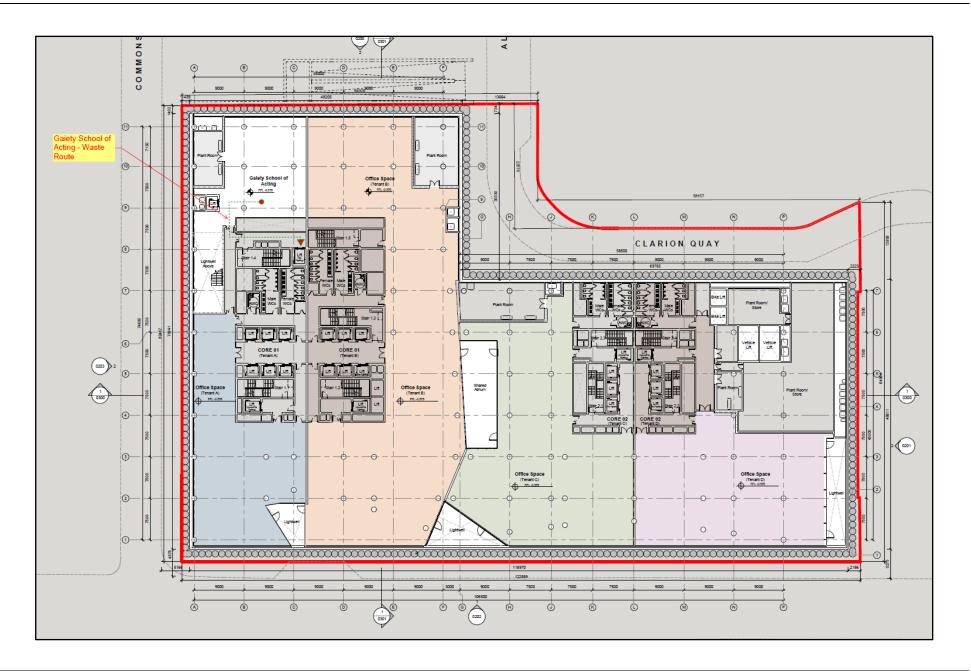
The waste strategy presented in this document will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated areas for waste storage will provide sufficient room for the required receptacles in accordance with the details of this strategy.

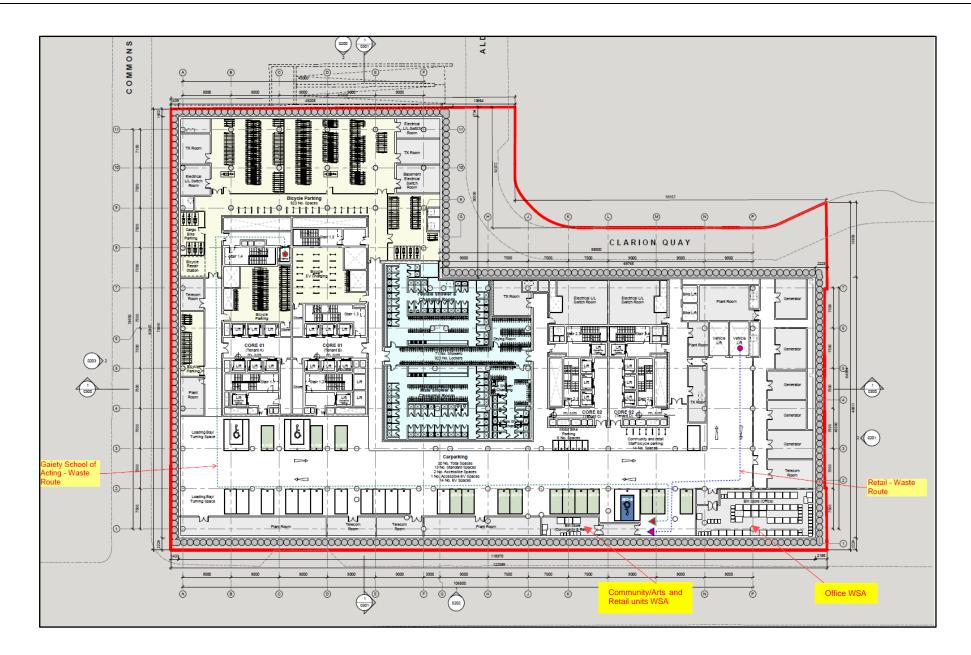
7.0 REFERENCES

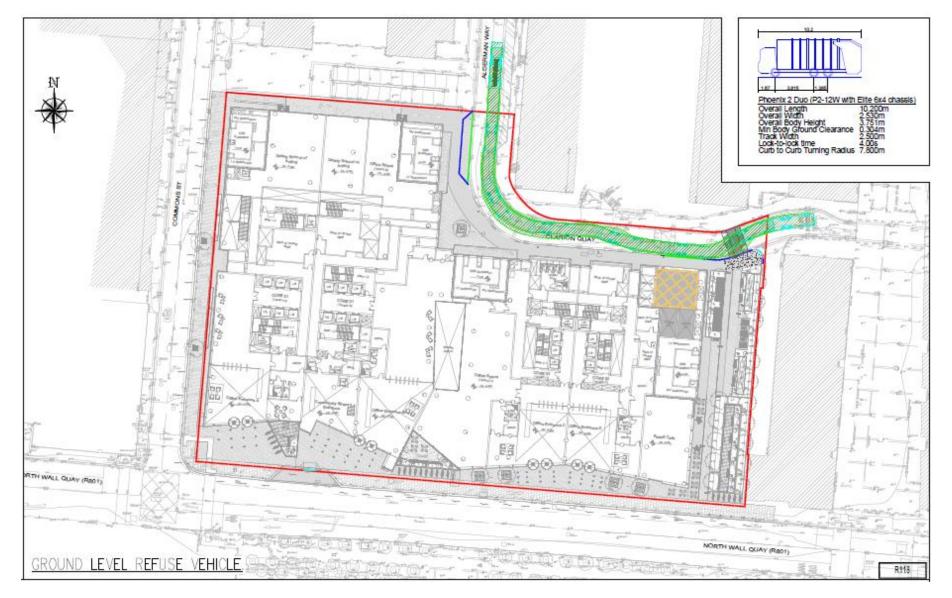
- 1. Waste Management Act 1996 as amended.
- 2. Environmental Protection Agency Act 1992 as amended.
- 3. Litter Pollution Act 1997 as amended.
- 4. Eastern-Midlands Waste Region, *Eastern-Midlands Region (EMR) Waste Management Plan 2015 2021* (2015).
- 5. DCC Dublin City Council (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws (2018).
- 6. Department of Environment and Local Government (DoELG) Waste Management *Changing Our Ways, A Policy Statement* (1998).
- 7. Department of Environment, Heritage and Local Government (DoEHLG), *Preventing and Recycling Waste Delivering Change* (2002).
- 8. Department of the Environment and Local Government (DoELG), *Making Ireland's* Development Sustainable – Review, Assessment and Future Action (World Summit on Sustainable Development) (2002).
- 9. Department of the Environment, Heritage and Local Government (DoEHLG), *Taking Stock and Moving Forward* (2004).
- 10. Department of the Environment, Climate and Communications (DoECC), *Waste Action Plan for the Circular Economy - Ireland's National Waste Policy 2020-2025* (2020).
- 11. DCCAE, Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less' (2021).
- 12. The Circular Economy and Miscellaneous Provisions Act 2022.
- 13. Environmental Protection Agency (EPA), National Waste Database Reports 1998 2020.
- 14. DCC, Dublin City Development Plan 2022-2028 (2021).
- 15. DCC, North Lotts and Grand Canal Dock Planning Scheme (2014).
- 16. Planning and Development Act 2000 (S.I. No. 30 of 2000) as amended 2010 (S.I. No. 30 of 2010) and 2015 (S.I. No. 310 of 2015).
- 17. European Waste Catalogue Council Decision 94/3/EC (as per Council Directive 75/442/EC).
- 18. Hazardous Waste List Council Decision 94/904/EC (as per Council Directive 91/689/EEC).
- 19. EPA, European Waste Catalogue and Hazardous Waste List (2002).
- 20. EPA, Waste Classification List of Waste & Determining if Waste is Hazardous or Non-Hazardous (2015).
- 21. BS 5906:2005 Waste Management in Buildings Code of Practice.
- 22. Department of Transport, Tourism and Sport and Department of Housing, Planning and Local Government, *Design Manual for Urban Roads and Streets* (2022).



8.0 APPENDIX 1: WASTE STORAGE LOCATIONS & ROUTES







9.0 APPENDIX 2: SWEPT PATH ANALYSIS