



**BY EMAIL:**

foodwaste@decc.gov.ie  
Public Consultation on the Draft National Food Waste Prevention Roadmap  
Waste Policy and Enforcement Division  
Department of the Environment, Climate and Communications  
Newtown Road  
Wexford  
Y35 AP90

10 March 2022

Dear Sir or Madam,

**Re: Public Consultation on the Draft National Food Waste Prevention Roadmap**

This response to the consultation deals with the Draft National Food Waste Prevention Roadmap, as it refers to multi-unit developments ("MUDs"), i.e. apartment developments and managed estates.

We wish to draw attention to our submission of 28 April 2021 to the Southern Region Waste Management Office in relation to the Pre-Draft Consultation Process for the National Waste Management Plan for a Circular Economy. A copy of that submission is enclosed. It drew attention to our submission of 21 February 2020 to the then Department of Communications, Climate Action & Environment concerning the Public Consultation on the Waste Action Plan for a Circular Economy.

Both submissions articulate our views on the issues of concern for the MUDs sector in this area of policy.

We draw attention to the valuable practical work being undertaken in this area by VOICE Ireland, through their Upgrading Shared bin Experience (USE) Project- [www.voiceireland.org/campaign/use](http://www.voiceireland.org/campaign/use).

For completeness, we note our engagement with the National Waste Plan Workshops being held online, hosted by RPS Group on behalf of the Regional Waste Management Planning Offices.

We would be glad to elaborate on any of the above by way of further correspondence, meeting, etc.

Yours faithfully,

[\*Sent by email and accordingly bears no signature]

[Redacted signature]

Encl.

**BY EMAIL:** [REDACTED]  
Southern Region Waste Management Office

28 April 2021

Dear Sir/Madam,

**Re: National Waste Management Plan for a Circular Economy  
Pre-Draft Consultation Process**

We refer to the above.

By way of our contribution to the present consultation process, we enclose our submission of 21 February 2020 to the (then) Department of Communications, Climate Action & Environment in relation to the Public Consultation on the Waste Action Plan for a Circular Economy.

That submission addressed the Waste Action Plan as it referred to multi-unit developments, i.e. apartment developments and managed estates.

We would welcome the opportunity to engage by way of virtual meeting, etc.

Yours faithfully,

***[\*Sent by email and bears no signature]***

[REDACTED]  
[REDACTED]

*Encl.*

# Apartment Owners' Network

*Representing the owners of apartments and houses in managed estates*

**BY EMAIL: [Wastecomments@DCCAIE.gov.ie](mailto:Wastecomments@DCCAIE.gov.ie)**

Waste Action Plan Consultation

Waste Policy & Resource Efficiency

Department of Communications, Climate Action & Environment

Newtown Road

Wexford

Y35 AP90

21 February 2020

Dear Sir/Madam,

**Re: Public Consultation Waste Action Plan for a Circular Economy**

We welcome this public consultation. Our response deals with the Waste Action Plan as it refers to multi-unit developments ("MUDs"), i.e. apartment developments and managed estates.

The principal points of this submission are-

- I. Waste collected under contracts between providers and owners' management companies ("OMCs") should facilitate waste segregation in the form of green (dry recycling), black (general waste) and brown (composting) bins when requested by the OMC.
- II. OMCs should be supported with financial incentives to provide for enhanced on-site communal waste facilities that will enable waste segregation/streaming. At a minimum, OMCs that take action to improve waste segregation facilities should not be financially disadvantaged as a result.

## **1. Consultation Questions**

We note the following in Section 3.6 Other Policy Options and Measures-

*"A quality waste management assurance award scheme will be developed for businesses (including apartments serviced by management companies) to sign up to. This will verify that premises are complying with best waste management practice in terms of waste prevention and recycling (including organic waste)."*

We further note in Section 3.8 Consultation Questions – Household Waste-

*"What can be done to improve recycling (including organic waste) in apartment complexes?"*

## 2. Observations

- 2.1. Bin storage areas in MUDs are usually part of the common areas of the estate. Common areas are owned and controlled by OMCs.
- 2.2. OMCs are not-for-profit companies responsible for the shared spaces and shared services in MUDs. OMC directors are in most cases volunteers, elected by the owners of homes in the MUD.
- 2.3. We draw to the attention of the Department the content of our submissions to other State agencies (all available at [www.apartmentownersnetwork.org/advocacy-2/advocacy](http://www.apartmentownersnetwork.org/advocacy-2/advocacy)) in relation to the parlous state of the finances of thousands of OMCs across the country.
- 2.4. The following recent reports examine MUDs and OMCs, and contain proposals for a sustainable model of MUD/apartment management in Ireland-
  - *“Owners’ Management Companies, Sustainable apartment living for Ireland”*, jointly commissioned by Clúid Housing and The Housing Agency
  - *“Safe as Houses?”*, All-Party Oireachtas Housing Committee
- 2.5. We draw to the Department’s attention the following helpful commentary from the CCPC 2018 report *“The Operation of the Household Waste Collection Market”*-  
[www.ccpc.ie/business/wp-content/uploads/sites/3/2018/10/The-Operation-of-the-Household-Waste-Collection-Market.pdf](http://www.ccpc.ie/business/wp-content/uploads/sites/3/2018/10/The-Operation-of-the-Household-Waste-Collection-Market.pdf)

*“The focus of this study is the household waste collection sector. Waste collection from apartment complexes was not examined in the context of the study as this is considered by operators to be a separate business operation, due to its cost structures, and more akin to the commercial waste collection market. In apartment complexes, waste is usually deposited in central waste bins. This centralised waste is collected by a waste operator on the basis of a contract entered into with the apartment complex’s management company that arranges the service for the apartment complex as a whole. Therefore, in contrast to individual houses, with their own identified bins, waste from individual apartments cannot, in the main, be weighed or charged on the basis of weight.”*
- 2.6. There is an anomaly in the law as it stands, in that it appears that waste contracts between waste operators and OMCs are treated as commercial waste contracts, instead of residential waste contracts. It appears that waste in MUDs is not subject to local authority bye laws in relation to waste segregation, required pursuant to Section 35(1) of the Waste Management Act 1996.
- 2.7. According to Census 2016, 80% of apartments are rented, and 20% are owner occupied. In most MUDs tenants/renters do not pay the waste management charge. Instead, through the annual estate service charge (or “management fee”) issued by the OMC, it is the landlord that meets the cost of waste collection. This means that there is a split incentive barrier- 80% of residents generating the waste in MUDs have no direct financial incentive to seek to reduce waste management charges, for example by rigorous waste segregation, which could reduce the total service charge levied by the OMC. In contrast, owner occupiers, who, like landlords, pay service charges to the OMC, have a direct incentive to achieve reduced waste costs, where such reductions would lead to lower annual service charges.

2.8. As noted, most apartment developments have a fixed space allocated to the storage of green and black communal bins. Any requirement to facilitate the storage of brown bins may cause the OMC to incur significant additional costs. These costs would arise from the need to alter storage layouts or construct additional storage areas, and to take other measures to cater for the unique health and hygiene requirements associated with the storage of brown waste.

2.9. **We submit that-**

- I. **Waste collected under contracts between providers and OMCs should facilitate waste segregation in the form of green (dry recycling), black (general waste), and brown (composting) bins when requested by the OMC.**
- II. **OMCs should be supported with financial incentives to provide for enhanced on-site communal waste facilities that will enable waste segregation/streaming. At a minimum, OMCs that take action to improve waste segregation facilities should not be financially disadvantaged as a result.**

### 3. Other Research

We draw to the Department's attention the content of other past studies of waste management in apartments-

- *Organic Waste Management in Apartments*, Environmental Protection Agency, Environmental Research Technological Development and Innovation (ERTDI) Programme 2000-2006  
[www.epa.ie/pubs/reports/research/waste/ERTDI%20No71\\_WEB%20final-with-cover.pdf](http://www.epa.ie/pubs/reports/research/waste/ERTDI%20No71_WEB%20final-with-cover.pdf)
- *Successful Apartment Living*, Evelyn Hanlon, Private Housing Unit, Housing and Residential Services, Dublin City Council, 2007  
[www.dublincity.ie/sites/default/files/content//Documents/Application\\_Forms/Housing/Successful\\_apartment\\_living\\_part\\_2.pdf](http://www.dublincity.ie/sites/default/files/content//Documents/Application_Forms/Housing/Successful_apartment_living_part_2.pdf)

### 4. Conclusion

We trust that the views expressed in the present format will be given due consideration by the Department.

We would be glad to expand on the above by way of further correspondence, or meeting.

Yours faithfully,

***[\*Sent by email and bears no signature]***

