

Waste Action Plan Consultation

Waste Policy & Resource Efficiency

Department of Communications, Climate Action & Environment

Newtown Road

Wexford

Y35 AP90

22ND February 2020

Re: Waste Action Plan Consultation

To whom it may concern,

Please find below Greyhound's response to the public consultation, "waste action plan for a circular economy". Greyhound Household is largest service provider in the Greater Dublin market and the only provider to operate extensively in the domestic waste collection market throughout the county of Dublin. The Greyhound group also operates in the commercial market and operates a 250,000 tonne licensed facility in Clondalkin, Dublin.

Yours Sincerely,



John Brosnan

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Consultation Questions – Institutional Arrangements

How are the current institutional waste prevention and management arrangements working and how could they be improved in your opinion?

Whilst all institutions endeavour to deliver what they consider to be their role in waste management and prevention there are significant policy implementation conflicts which impact the country's ability to achieve global targets. Individual interpretation of targets rather than a collaborative approach what is required for the greater good of the country is sometimes prevalent.

An example of this includes significant targets for waste reduction which require new ways of operating and processing however implementation of these innovations is stymied by cautionary interpretations of legislation and inappropriate and conflicting allocation of resources by certain institutional bodies.

A more joined up and collaborative approach to waste prevention and management is required whereby emphasis is placed on innovation and achieving national targets. Individual institutions should be targeted with enabling rather than curtailing, solutions rather than issues are prioritised and this will result in significant improvement within all aspects of the industry.

Consultation Questions – Household Waste

Is incentivised charging working in your opinion? Are households being financially incentivised to prevent waste and recycle correctly through the 3 bin system?

Greyhound Household has seen customers double the use of their compost bin since the introduction of incentivised charging. In this time the use of the residual and recycling bins has remained constant. To that end the incentivised charges are working.

Households that use a 3 bin system from legitimate operators are incentivised however there is an increased occurrence of smaller permitted collectors operating with impunity without weighing technology, collecting single streams for cash and not reporting or disposing of material correctly. This, when unchecked, reduces customer appetite for incentivised charging.

Would an incentive scheme which compared your performance on how you generate and recycle your household waste with your area / county etc change your waste management behaviour?

Greyhound Household already offer this to customers. It has had a mixed reaction and has not delivered the anticipated change in consumer behaviour.

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

Apartment complexes are generally managed by the commercial departments of waste management companies and property management entities and as such are utilising different payment methods. An obligation to comply with the same incentivised charging mechanisms as the domestic customers would increase segregation.

Increased and improved communications is vital and along with bespoke marketing and internal incentive plans has proven successful in the past.

Consultation Questions – Commercial Waste

How could pricing structures for commercial waste collection be improved to incentivise better segregation and recycling of waste? For example, should pay by weight be introduced for commercial waste?

The implementation of pay by weight would have an immediate impact however the commercial industry has a different dynamic than the domestic portion of the industry and it is likely that below cost selling may become a factor as operators seek to maintain market share rather than adapt incentive recycling and segregation.

What further incentives could be put in place to encourage business to recycle more?

1. Reduced compliance charges for waste producers who can show legitimate increases in recycling and recovery rates and the opposite for those who do not recycle.
2. The publication of a national register for recycling rates for all business.
3. All businesses must display their recycling rates at the entrance to the building.

Consultation Questions – Food Waste

Should Ireland introduce a national prevention target in advance of a possible EU target?

Yes

Consultation Questions – Plastic and Packaging Waste

Do waste collectors have a role to play?

Yes, waste collectors have a significant role to play – they are the educators and gate keepers to the various options to increase, reuse, recycling and recovery. It is incumbent on all collectors to find the best option for this material.

Consultation Questions – Citizen Engagement

What campaigns would better assist householders and businesses in preventing and segregating waste properly?

A singular campaign aimed at clarifying clearly what is possible. There is conflicting and augmenting advice to consumers which sometimes does not reflect what should happen at a practical level. Concise messages aimed at cementing user behaviour is required and those stakeholders that do not get behind this messaging should be addressed by the appropriate steps available.

Waste Collectors have a condition in their permits to maintain on-going communication with their customers in accordance with their customer charter. Do you agree that collectors are giving sufficient information to their customers in relation to separating waste into the 3 bins?

Not all operators are but in the main yes.

Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households?

It is probably too late at this stage as most segregation happens within the house and transported to the bins pre-sorted in various bags. A campaign targeting the segmentation points within the home and the smaller internal bins would probably deliver greater results.

Consultation Questions – Waste Management Infrastructure

Should one national waste management plan be produced in place of the 3 current plans?

Yes

Should the State assist in funding the development of indigenous waste recycling facilities? If so, how should this be funded?

Certain facilities that are required to make the state more self sufficient could be funded by the state but they should probably be run via tender like civic amenities. Providing funding to private operators in the guise of creating of creating indigenous waste solutions may distort the market and allow some operators an unfair advantage through either disproportionate access to the facility or reduced gate fees and should be avoided.

Creating waste recycling plants not only presents barriers to entry due to the huge cost of build but also in terms of ongoing energy consumption costs. The Irish electricity grid is already at full capacity in many urban areas. In an effort to reduce these costs many plants look to CHPs which are usually powered by fossil fuels such as gas or diesel. In many cases the carbon emissions created by recycling can outweigh the benefits of the process. The Irish government could lead the EU to create a new approach for low carbon power solutions for waste recycling facilities funded in part by grants and tax incentives.

Consultation Questions - Waste Enforcement

What, in your view, are the factors leading to waste crime (please tick one box)

- ***Ineffective enforcement by the authorities*** ✓
- ***Ineffective penalties*** ✓
- Waste Market Factors
- Lack of awareness
- Other (please specify)

In our experience the potential for profit for criminal operators and the disproportionately small penalties available to local authorities incentivises this type of activity. The largest individual cost for legitimate operators is the legal disposal of material and criminal entities can avoid this cost by illegally dumping. A more holistic approach is required and in general the advice should be “follow the money”, ask the producer to demonstrate commensurate disposal charges for waste generated and the collector processing and disposal costs for material collected.

What measures are required to respond to the links between waste crime and other forms of serious criminal offences, such as organised crime?

Educate the customer firstly and thereafter “follow the money” as above utilising the various mechanisms available to state where appropriate.

What other penalties could be considered for illegal dumping by households/members of the public

In some countries the polluter is made to clean up their dumping once identified or clean up dumping from another if the original dumping site has been cleaned.

Are there examples of existing good practice to prevent illegal dumping?

The campaign run by Dublin City Council to identify individuals who illegally dumped was effective and demonstrated the type of measure required to effect change. Initiatives like this should be applauded and rolled out nationally.

What contribution to the cost of the enforcement system should the waste industry make?

The industry should be made invest in technology that facilitates the enforcement system. This would require significant investment and if delivered would enable increased enforcement and at a lower cost.

Should financial provision be a requirement for permitted waste facilities?

Yes

Consultation Questions - Waste Data

Do you believe it would be beneficial to have all/most waste data available on at least a quarterly basis?

Yes

What resources are needed to validate this data more quickly and what are the barriers?

Greater use of technology and better software. Cost and a suitable software partner are the greatest barriers at present.

Do you believe that all waste should and could be tracked from site of creation to final destination?

Yes

Are there confidentiality or other issues for industry in reporting on waste flows?

There can be but with appropriate legislation these can be overcome.

What changes need to be put in place to facilitate better reporting?

Better software technology and more consciousness on the use of data at the database level.

What uses can be made of having more detailed, accurate, timely data?

- Better more targeted enforcement
- Greater flexibility at an institutional level
- Greater visibility on issues like disposal and processing capacity

What penalties should be in place for the non-provision of data?

Financial up to revocation of collection permit

Consultation Questions - Consumer Protection & Market Monitoring

In your opinion, should an economic regulator be established? In considering your reply it is recommended you consider the detailed rationale set out in the CCPC report, available [here](#).

This is a complex question and can't be answered in isolation from the other recommendations in the CCPC report.

Upon publishing the report the CCPC stated:

“State, commercial and consumer interests are continually overlapping and often conflict with each other, and these factors have played out differently in different parts of the country. As a result, we believe that a review of Government policy and specifically the introduction of economic regulation is required to make this market work better for consumers, industry and the State, in the medium and long term”

Whilst much of what we have stated in this submission agrees with the statement “State, commercial and consumer interests are continually overlapping and often conflict with each other” we do not agree with the CCPCs assertion that “consumers have little or no power to influence the behaviour of operators in this market” as customers and their behaviour significantly drive our business and innovations every day. Recent challenges in the global recycling market have resulted in draconian steps in markets where competition for the market exists. Reduced collection frequency and disposal rather than recycling of recycling material has occurred in the UK, Australia and the US where the market is artificially carved up. The CCPC’s recommendation for “The power to grant an exclusive licence or licences in specified geographic areas” is fraught with risk and recent international examples show that if such initiatives were to be implemented the consumer would be charged more for a lower quality, less environmentally conscious service.

With the above in mind we feel we could not endorse an economic regulator in the scenario outlined by the CCPC but would endorse one whose responsibility it would be to improve the level of service provided in the current industry format, increasing industry wide co-operation and with the power to compel the various industry stakeholders to comply with legislation via the use of punitive legislative powers.

Should a new office be set up or should the powers of existing regulator be broadened?

A new office should be set up

What alternatives are there to setting up a regulator, for example, improved regulatory oversight for customer’s complaints?

The UK’s water industry has a successful entity called The Consumer Council for Water (CCwater), <https://www.ccwater.org.uk>.

CCwater is not a regulatory body but rather it is a statutory consumer body for the water industry offering independent advice and support pertaining to issues that consumers may have. In our opinion this is an approach worth considering as an alternative to a regulatory body.

Would you support the Group undertaking whole of market monitoring including publishing prices for household waste collection for all collectors in all areas?

Yes

Do you believe that a consumer complaints body should be out in place?

Yes

If yes, what powers would such a body have?

The ability to make binding decisions for customer complaints.

Should it be included within an existing body e.g. CCPC or the National Waste Collection Permit Office?

The NWPCO