

# THE IRISH HOUSEHOLD WASTE COLLECTION MARKET

## Public Consultation Submission

Submitted by: Fred Harte, Co. Dublin.

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### INTRODUCTION

I write as a consumer, originally with Fingal County Council, and latterly with Panda Waste since the former relinquished their involvement in waste collection. In this submission I broadly follow the format of the CCPC public consultation document of 9<sup>th</sup> February 2018 and confine myself to observations on:

- A. Regulatory Environment
- B. Market Coverage
- C. Waiver of Waste Collection Charges

I attach three emails from me to Panda as evidence in support of the point made in section A below. I am aware of the FOI act, but do not consider any of the material herewith or herein to be sensitive in this regard.

#### A. 2.7 (a)

On 7<sup>th</sup> December 2012 I received a notification from Panda stating their intention to increase the standing charge for bin collection. I responded with a letter that argued for the continuation of a much reduced charge on account of my very low requirement of their services. The outcome was an agreement to limit my annual service charge to €20 per annum which operated from that time until the end of 2017. Late last year Panda announced their intention to resile from such agreements and impose a flat fee of €110 per annum generally. I reiterated my objection to such an arrangement in a number of letters to Panda to none of which I received a reply. Even though in my letter I stated that I would not avail of Panda's services during 2018 should they not agree to a reduction in their standing charge, €110 was deducted from my account.

This matter is being pursued elsewhere, and I only mention it here to highlight the disadvantage of their being no regulatory body to whom one can turn in the event of a dispute. Had there been such a body I would probably not now have to be engaged in troublesome methods to establish fair and proper treatment from what is a monopoly.

#### B. 2.3 (b)

As a brief background: in 2017 I left just *two* green bins out to be lifted, and either brown or black, *none* at all. In the six years [from January 2012] in my time to date with Panda I have left bins out for collection as follows: Green, 17; Brown, 9; Black, 2. That is, 28 bins in six years which, if the €110 pa charge applied, would amount to €28.57 per bin plus another charge in the case of black bins. This level of charge is palpably unjust and will drive some to dump illegally, and others to find alternative methods of disposal. Discounting illegal dumping there are two alternatives:

- use of someone else's bins by arrangement
- use of small public litter [bruscar] bins by frequent disposal in small lots.

I have personal knowledge of the use of both these alternatives. In the case of the bruscar bins I doubt if those who use this method bother, or have a need, to organize their waste as they normally should. The current pricing structure is likely to dissuade household participation in the kerbside waste collection market. The annual flat charge must be the main factor for many people as it is for me.

C. 2.4 (b)

I have never sought a waiver, and indeed have suggested to Panda that they have a charge per bin lifted irrespective of colour although I would expect a variable price depending on the colour.

I maintain that a fair and transparent pricing system would be one where a householder pays for the service they use depending on the frequency and type of use added, perhaps, to a minimal registration charge per annum.

Where there is a generally accepted pricing scheme a national waiver scheme is not necessary. I recall dealing with Fingal County Council which operated such a scheme and can appreciate their having to deal with a multitude of claims, some genuine, others spurious. A commercial enterprise would only be inhibited in its efforts to run a profitable business if it had to factor in a waiver scheme.