



Submission to the
Competition and Consumer Protection Commission

On
The Irish Household Waste Collection Market

From:
**Cré – Composting and Anaerobic Digestion
Association of Ireland**

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1. Introduction

Cré welcomes the opportunity to comment on the consultation on the Irish Household Waste Collection Market. Our submission is focused on the questions in relation to brown bin collections.

2. Brown Bin Collections

In the consultation document - Regulatory Environment 2.7 (e) it stated:

What are your views of the roll-out of a dedicated bin for organic household waste in Ireland?

Cré supports initiatives to increase the amount of household brown bin material collected in Ireland.

To date the roll out of brown bins to households has not been entirely successful. After many years the tonnage of brown bin material collected is below predictions. There are agglomerations where they should be brown bins provided and there is not.

Waste Stream	Potential Tonnes Available
Household Brown Bin	255,8031 ¹ 231,2652 ²
Commercial Brown Bin	306,5783 ³
Potential Brown Bin Material	537,843 – 562,381
Total Collected 2015 as %	143,000 ⁴ Approx 27%

Indecon for the Department of Environment, Community and Local Government in their 2011 Regulatory Impact Analysis for the European Union (*Household Food Waste and Bio-waste Regulations 2013* (RIA) predicted that by 2015, there would be 203,360 tonnes collected. Actually only 87,230 was collected, **57% below** the predicted tonnage by Indecon.

National Strategy on Biodegradable Waste has a performance indicator for Biological Treatment Tonnage Treated of 331,597tonnes by 2016

There are waste collectors which Cré would class as good collectors making an effort to promote the brown bin and in the same area competitors are not providing the service. The good collector is in effect put at a commercial disadvantage for complying with the law.

The processing sector has built infrastructure to process brown bin material but the expected tonnage has not materialised which has resulted in some plants to close (e.g. Galway City Council) and others are processing other temporary waste streams that are now going to decrease in quantity.

The plants processing brown bin material are processing material which in many cases is heavily contamination due to poor education of householders.

In 2004, the Government's waste policy was called '*Taking Stock-Moving Forward*', the policy document is now out of date, but the title should be now applied to the current situation in relation to household and commercial brown bin collection and processing market in Ireland.

¹ EPA National Waste Report 2011

² Statement of Regulatory Impact Analysis Waste Management (Household Food Waste Collection) Regulations 2011. Department of Environment, Community and Local Government, Prepared by Indecon, June 2011

³ EPA National Waste Report 2011

⁴ EPA (2016) Composting and Anaerobic Digestion in Ireland

As a sector we need to identify the issues surrounding brown bin collections and address them collectively, if we don't the current situation will not improve.

Enforcement of the brown bin regulations has been on the agenda of enforcement authorities for many years and unfortunately despite the efforts has not yielded any significant behavioural change.

Introducing a new charging regime of pay by weight was seen by many as a first step to improve things and to create awareness of the consumer of the way they handled their waste. Unfortunately universal pay by weight is not in place.

Cré in recent times has shifted focus to awareness and has seen results in terms of the National Brown Bin Awareness trial in Sligo which by giving householders the correct educational tools - a kitchen caddy and compostable bags- this doubled participation rate and decreased contamination to less than 1-3%.

Efforts and resources need to be refocused to 'empowerment of the consumer' through a €1.5 million national awareness campaign per year over a three year period, funded by Department of Communications, Climate Action and Environment (DCCAE).

A good national sustained awareness campaign should result in the consumer being educated on their right to a brown bin and how to use it properly. They in turn ask their waste collector for one and use it correctly by having low contamination for the processor to produce compost.

By waste collectors having a large quantity of brown bin collected, it results in increased efficiencies for waste collectors. It then begins to make more economic sense to be adding on rural routes.

Coordinated Brown Bin Awareness Plan

A coordinated national brown bin awareness campaign is required to be developed with input from collectors, processors and regulators. Once developed all stakeholders should support the campaign in order for it to be a success. All stakeholders has experiences in this area and all their expertise should be pooled together to develop the plan and then each stakeholder implement their part of the plan.

A expert media company needs to be hired to find a 'catchy message' such like the 'Race Against Waste Campaign and the Road Safety Authority campaign on tyre tread depth safety 'when tyres loose grip – you loose everything'- <http://www.rsa.ie/RSA/Road-Safety/Campaigns/Current-road-safety-campaigns/Tyre-Safety1/>



raceagainstwaste.com



Reduce Reuse Recycle

Impactful advertising as part of the *Race Against Waste* campaign.

NATIONAL BROWN BIN EDUCATION PLAN SCOPE



3. Single Waste Regulator

In August 2006, the Department of the Environment, Heritage and Local Government initiated a public consultation process, aimed at examining the possible regulation of the waste management sector. The Department's consultation paper posed the following issues for discussion:

- Is another regulator needed for the waste management sector?
- What model of regulation is most appropriate?
- Who will be responsible for the regulation of the waste sector?
- What services should fall within the remit of a regulator?
- What functions should a regulator have?

In recent times, the suggestion of a single waste regulator was raised during the discussion on the household waste charging.

The concept of a single waste regulator deserves merit for further investigation as there are many regulators involved in regulating the waste sector. Streamlining the responsibility to a single entity would result in efficiencies and development of staff with focused expertise.

Currently, there is need for greater enforcement of the commercial and household food waste regulation.

A variation on this concept could be 'a single waste regulator for the commercial and household food waste regulations'. This could be tendered out. For example, Dublin City Council tendered out the enforcement of the fats, oil and grease regulations and the commercial food waste regulations.

The idea and scope of a single regulator need more consultation with all stakeholders.

4. Market

Cré acknowledges that there are issues within the currently market such as there are good waste collectors making an effort to promote the brown bin and in the same area competitors are not providing the service. The good collector is in effect put at a commercial disadvantage for complying with the law.

The solution to this is to focus on the existing market structure with improved enforcement. This approach will lead to the quickest way to improving the market.