

Draft Statement of Waste Policy

Submission on behalf of the Dublin City Council Environment & Engineering Strategic Policy Committee (SPC)

Introduction

This Committee recognises the need to implement a more sustainable long term approach to waste management through the prevention, reuse and recycling of waste using the most advanced, modern and economically viable systems available. However, the Draft Policy falls well short of this in terms of detailing how we are to achieve that goal. The Draft seems to be over reliant on MBT, about which there is still great uncertainty. The committee questions the relevance of MBT to the Dublin region given that we already have domestic separation at source.

In addition, the Draft Policy Statement seems intent on eradicating the powers of local democracy in terms of waste management. We call on the Minister to ensure that the consultation process is a balanced one and all opinions are taken on board so as to deliver a more viable and sustainable waste management industry into the future.

The comments of the Committee on the individual aspects of the Draft Policy Statement are as follows:

6.1. Waste Management Planning

- (a) The policy proposed again appears to represent a further diminution of the powers of Local Government. This is unacceptable to the Committee and the Minister needs to ensure that local democracy prevails in the decision making process.**
- (b) The Minister should ensure that his proposed consultative forum is balanced and not all from one side of the waste management industry**

6.2 household waste collection market

In relation to the Household Waste Collection Structure, the Ministers Draft Statement says that *“the organisation of the market for household waste collection is a key issue requiring urgent action”*. The Committee feels that

- (a) the household collection issue needs immediate attention and the introduction of any policy changes/new legislation should be completed by 2013 and not left until 2015 as stated in the draft strategy**
- (b) Any household waste management waivers for customers (public and/or private) should be a matter left to each local authority to decide upon**

6.3. Waste Management Regulation

The Draft statement says *‘consideration is now being given to the rationalisation of the waste regulatory functions of local authorities into a single nationally administered arrangements.’* – **the committee feels that this draft policy is designed to remove control from local authorities and akin to democratic centralism in that local authorities would be removed from the decision making process. This policy proposal is unacceptable to the committee. Each local authority needs to maintain a strong involvement in local governance. The committee feels that the local authority system i.e. Management and Elected Members should not be told what to do by central government.**

6.4. Direction of Waste

The draft policy states that *'consideration is being given to the introduction of measures to ensure that no local authority should enter into any contract for treatment or disposal of quantities of waste which would exceed those that they or their agents might reasonably expect to control.'*

This is the clearest demonstration of the Ministers intention to restrict the powers of Local Authorities. There are already sufficient legislation and guidelines in place governing the activities of Local Authorities in the performance of their functions. This proposal must be removed.

6.5 Level of service

6.5.1 Collection Services

Having up to six separate collections of different types of segregated waste is a laudable policy objective but there is no point in having this type of collection if it is not viable and economically sustainable. If the proposal envisages collecting several types of waste on the one truck then that may be a way forward, i.e. householders use of smaller bins that could be manually lifted/emptied as opposed to having to use a mechanically/electronically operated device.

6.5.2. Civic Amenity Sites

While welcome, the provision/management of bring centres must be done in a manner which encourages public acceptance of same. Any negative side effects on local residents must be avoided. One way of achieving this is to ensure that all garden waste/bio waste is removed nightly from the site.

6.7. Targets and Incentives for Residual Waste

The draft statement proposes that *'targets would be set under which local authorities would be required to secure reductions in the amount of residual waste generated by households in their areas and in the event of such targets not being achieved, a charge would be applied to excess tonnage generated.'* There will always be a residual element regardless of our waste management methods. Progress on waste segregation with the public to date has been done on a goodwill basis and to talk of charging the public more would damage the overall objectives. This objective is totally unworkable in the current climate given the uncertainty in the collection service and the lack of proper infrastructure and cannot merit consideration until those issues are fully addressed.

6.8. Waste Facility Levies

The Minister has to ensure that if any levies are being introduced they must be applied fairly across all types of waste management facilities and technologies.

6.10.4. Deposit and Refund Study

The issue of Deposit and Refund Schemes has been the subject of ongoing debate over the last number of years and the proposed study must be completed as soon as possible.

6.12. Waste Prevention

The current approaches have had minimal impact and there is a lack of any real substance in the statement. This area requires further detailed proposals.