



Mr. Leo Duffy
Programme Manager,
NWCPO
Áras an Chontae,
Charleville Road,
Tullamore,
County Offaly

7th June 2018

Re: Review of Household Kerbside Waste Collection Data Reporting Systems

Dear Leo,

Further to our meeting of 12th April and your report dated April 2018 on the above-referenced subject, the IWMA offers the following comments on the matter.

We are strongly opposed to the suggested requirement to provide monthly reports on kerbside household waste collection. At our meeting on 12th April, I noted the following feedback from our members:

- IWMA members stated that monthly reporting would be very time consuming and a significant burden on business. The data is not readily available in a form that can be collated quickly and easily. The person collating the data needs to check local authority areas and needs to verify large quantities of data before it is fit for submission to the NWCPO. This would be a full time job, even in a small company, if monthly reporting was required.
- It was suggested that the WERLAs could target companies that are under investigation and they could require more frequent reporting by that company during the course of their investigation, rather than targeting the whole industry in this way.
- It was also suggested that the enforcement authorities could carry out spot checks at the offices of any waste collector to see if brown bins have been rolled out in mandated areas.

In your April 2018 report, you identify a number of the issues that we raised including the following:

- The datasets currently used by our members do not include fields identifying each local authority area, so a detailed verification process is undertaken by each waste collector before a report is submitted to the NWCPO. It would require a lot of work for this to be applied retrospectively to 1.2 million household customers (including non-IWMA collectors), so we consider this to be a significant burden on business.
- Apartments are often considered to be commercial customers by our members as they are arranged by way of commercial contracts with the management companies. Hence there is a lot of verification work when these are included as households in the annual returns. This would be increased 12-fold for monthly reporting and we consider this to be an unnecessary burden on business.

In addition, written feedback from members includes the following comments.

1. ***Time and resources*** – at present our members collect waste from approximately 875,000 households and a large number of commercial customers. All waste data is recorded using the relevant software and report templates have been prepared to allow annual return data to be collated. However, data is often run at a site level to facilitate EPA licence requirements. The waste collection data forms part of wider datasets that need to be manually screened and analysed to pull out the required information. Whilst the suggested requirement for monthly data may be limited to domestic customers, the same amount of data validation is required to separate the domestic collected tonnage data from the commercial.

It typically takes 3 months to prepare and validate annual data. Some of our members are large multi-facility companies and even our medium sized members have more than one facility. Annual returns are primarily collated by the compliance team with additional support from individuals at each waste facility as well as the central logistics team. It is not as simple as running a report – the report must be reviewed by weighbridge staff and validated as accurate. If we were to move to monthly or even a quarterly reporting regime, the resources required would be crippling to site and compliance operations.

It is also notable that many people working on the household customer data have an increased workload currently due to the requirements of GDPR.

2. ***Presentation rates data*** – currently our members do not have a set report written that would allow us to generate a monthly report. The annual data is collated at a point in time and again takes valuable time away for daily operations to generate. The move to reporting monthly presentation rates would stifle operations. It would also not provide the WERLAs with tangible information as a 4 week period for brown bin presentation would not glean sufficient insight into uptake or to presentation rates. Bi annual brown bin presentation rates would provide a more accurate picture for the WERLAs to observe Brown bin uptake. The statement that the “*system providers have advised that this data is already being gathered in the system and can*”

be generated as a report” is entirely anecdotal, general and completely irrelevant as it does not take into account human error, data collation and the requirement to generate and assess the data. We are all fully aware the data is in the system but it’s the time required to make sense of the data that is at the heart of this issue. Our members simply do not have the resources to carry out that level of analyses on a monthly basis.

3. **Apartment numbers** – Our members do not at present have a dedicated report for apartment numbers on our domestic systems. Apartment blocks are recorded as commercial customers as they are so frequently run by management companies. This is not something that we could fix in the short to medium term.
4. **NWCPO and Enforcement Resources** – We find it hard to believe that the NWCPO and the enforcement authorities have the resources to examine and analyse data from 1.2 million houses on a monthly basis. We suggest that it would be a better use of their time if they targeted a specific waste collector by conducting onsite audits to gather live data in real time.

In short, placing this burden on business would inevitably cost our members millions of euro in additional human resources.

It would also require significant additional human resources to be put in place by the State to manage that data and to use it for enforcement purposes. We are currently working off national waste data that is 4 years old and we have not seen the publication of a National Waste Report (NWR) since 2012. We respectfully suggest that the State would do better to put additional resources into the National Waste Report team in the EPA to prepare more frequent and more current NWRs.

We also respectfully suggest that the enforcement authorities would be more effective if they regularly conducted spot checks at waste collectors’ offices, rather than attempting to gather an unmanageable amount of data.

Regulatory and Administrative Burdens on Business

In 2008, the IWMA engaged with a ‘*High Level Group on Business Regulation*’ that was tasked with reducing regulatory and administrative burdens on business. The work was commissioned by the Tánaiste & Minister for Enterprise, Trade & Employment¹ and culminated in a report published in July 2008.

That report recognised a number of regulatory burdens in the waste sector and was instrumental in the streamlining of waste collection permits, which eventually led to the establishment of the NWCPO.

Section 2.1.6 of the report recognised an administrative cost saving of €8 million due to the streamlining of the waste collection permitting system. From 31st March 2008 it was possible to apply to a single authority for a National waste collection permit and this was a major move forward for all concerned.

¹ Now the Department of Business, Enterprise and Innovation (DBEI)

We suggest that the requirement for monthly reporting would overturn those savings and would introduce a major administrative burden that would be contrary to the efforts of the work carried out by the High Level Working Group on behalf of the Tánaiste & Minister for Enterprise, Trade & Employment. This would also add to the cost of household waste collection, which would inevitably be passed on to the consumer.

In Section 6 of Appendix B, the report noted that, in the consultation process, the IWMA had requested that *“Information required for licensing and enforcement should be necessary and only collected once”*.

In response, the authors of the report stated that *“There should be scope to reduce. The EPA is looking at risk-based approaches.”* And under Action items, the report stated *“Being explored by the EPA. The High-level Group will be kept up to date.”*

It is clear that the Irish Government is concerned about unnecessary administrative burdens on business and is doing all in its power to remove or reduce any such burdens. In the event that more frequent reporting is mandated by the NWCPO & WERLAs, despite our opposition, we reserve the right to challenge it and to seek the support of the Department of Business, Enterprise and Innovation in that challenge.

I hope this submission is informative and we look forward to further positive and productive engagement with the NWCPO and the WERLAs.

Yours Sincerely,

A handwritten signature in cursive script that reads "Conor Walsh".

Conor Walsh
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