



Mr. Kevin O'Donoghue
Department of the Environment, Climate and Communications
Newtown Road
Wexford
Y35 AP90,

By email only to kevin.odonoghue@decc.gov.ie

22nd September 2021

Re: Consumer Protection Measures for Household Waste Collection

Dear Kevin,

Further to our meeting of 9th September 2021 on the above topic, we held a meeting of our Household Waste Collection Subgroup this morning and we offer the following feedback.

The proposed measures are generally welcomed by the IWMA, as the Association has lobbied for greater consumer protection within the existing market structure, utilising the NWCPO and PMG.

It was suggested that the NWCPO could analyse waste collection permit AER data and form a league table of household waste collectors, based on the waste prevention and recycling performance of each collector. The NWCPO could then concentrate on enforcing better incentivised charging and consumer awareness on the companies that are near the bottom of the league table, say the bottom 10 companies initially. Those companies could be required to submit quarterly data to show improvements in their performance, with a view that penalties could be imposed for continued poor performance. Once these companies improve their performance, presumably by changing their charging system or otherwise incentivising their customers to prevent and recycle waste, the NWCPO could reconfigure the league table and continue to challenge the poorest performers.

The new powers extended to the NWCPO should not lead to an additional administrative burden on waste collectors that are performing well in the context of waste prevention and recycling. Additional burdens on collectors performing poorly in that context should be targeted and should see improved performance over time, so the burden may be temporary in nature.

It was suggested that the NWCPO or other State organs should not standardise or otherwise put limits on charging structures. Such interference could lead to unintended consequences, such as public protests or political challenges. The waste collectors are best placed to manage customer expectations and to address the variations in their customer base, but with the new NWCPO powers will also be obliged to improve the waste generation and recycling performance of their customers if they are performing poorly in that context.

Whilst the IWMA subgroup does not object to the publication of prices, it was suggested that the NWCPO should firstly progress their work, which we expect will weed out non-incentivised charges. To publish the price data in advance of that work could lead to the unintended consequence of

encouraging households on incentivised pricing structures to move to less incentivised options. Many householders want certainty in their waste management costs. The B&A survey that was Appended to the 2018 CCPC report on 'The Operation of the Household Waste Collection Market' suggests that a 'flat fee (all you can eat)' for household waste collection is the most popular option amongst Irish households. Hence the fear that some household customers will switch to the plans that are closest to 'flat fees' when put in front of them and that would be contrary to the best environmental outcome.

We hope that the above feedback is helpful and we look forward to working with the DECC, NWCPD and PMG on these measures.

Yours Sincerely,

A handwritten signature in black ink that reads "Conor Walsh". The signature is written in a cursive, flowing style.

Conor Walsh
IWMA Secretary

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