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To Whom it May Concern

Subject: Waste Collection Market Feasibility Study – Consultation Submission

VOICE are an environmental NGO active in Ireland for over 26 years. VOICE work on waste reduction and circular economy. VOICE are members of Zero Waste Europe and the EEB in Europea, and the IEN here in Ireland. VOICE have long been actively involved in waste policy in Ireland, including calling for the introduction of the Deposit Return System, the launch of Ireland's first Zero Waste communities, and supporting greater waste segregation and reduction through community and business engagement projects.

VOICE are happy to respond to the Department's market feasibility study on waste collection in Ireland. Ireland is unique in Europe in its side-by-side competition model for waste collection. The model was introduced with the aim that, through competition, Irish householders would be offered competitive pricing for a quality service. Since it's introduction waste per capita to be managed has grown significantly, while the regulations and targets for collection, segregation and recycling have also increased. For example, VOICE estimates that following current trends, Ireland is in significant danger of failing to achieve targets for packaging waste as set out in the PPWR, on track for a 64% increase by 2040 rather than the targeted 15% decrease[1], 98% of peple we surveyed are frustrated with the quantity of waste that needs to be segregated[2], while the EPA has highlighted

[1]https://www.voiceireland.org/news/new-eu-regulation-sets-binding-targets-on-packaging-waste---ireland-is-already-behind-2

[2]National Recycling Bin Survey https://cdn.prod.website-files.com/606fdf75a1ce4331ed2696ec/65075027a7be7fe78fd81ee5_VOICE_The_National_Recycling_Bin_Survey_2023%20Web.pdf

increasing levels of contamination in bins[3], and decreasing recycling rates over the last 5 years, warning of impending missed municipal and packaging recycling targets[4].

This highlights the urgent need for a review of the waste collection services in Ireland at this time, to ensure they are fit for purpose, and supporting a change to a circular economy.

Pricing & efficiencies

A 2018 study by CCPC showed little competition within the market[5], and suggest the establishment of a regulator for the system. The continued involvement of the CCPC in recent sales and acquisitions proposals in 2025 shows the market has not developed significantly since, and is still highly concentrated in a small number of stakeholders[6].

At the same time, a PMG group reported in 2020 that the “Pricing landscape for residential waste collection is complex”[7] and advise that “It can be difficult to find out what certain operators charge for waste collection, so you may need to ring up”. None of the regular price comparison websites carry information on waste collection services to date.

Research from the Public Institute of Public Administration published in 2023 showed pricing to be similar in Dublin to comparator cities across Europe with varying administrative structures[8].

At the same time, there has been some significant commentary on the carbon impact and traffic impact of running multiple trucks from different companies into the same area over the course of the day.

In Dublin city the consequences of the side by side approach mean that the implementation of bin solutions for older buildings and businesses is significantly hampered when compared to areas with a single waste operator – where opportunities for under road storage and other centralised approached may be examined.

[3]https://www.epa.ie/news-releases/news-releases-2023/epa-calls-for-urgent-action-to-improve-irelands-household-and-commercial-waste-segregation-and-recycling-performance-.php

[4]https://www.epa.ie/news-releases/news-releases-2024/irelands-recycling-rate-has-not-improved-in-a-decade-it-is-time-to-move-away-from-a-wasteful-linear-economy-.php

[5]https://www.ccpc.ie/business/research/market-studies/household-waste-collection-market/

[6]https://www.ccpc.ie/business/ccpc-issues-decision-on-kwd-group-acquisition-of-bord-na-mona-recycling/

[7]https://www.gov.ie/en/department-of-the-environment-climate-and-communications/press-releases/price-monitoring-group-residential-waste-collection-prices-fluctuate-in-january/

[8]Research in respect of the remunicipalisation of waste services in Dublin City Council Research on behalf of the Strategic Policy Committee of Dublin City Council (Climate Change, Environment and Energy) https://s3.documentcloud.org/documents/23695030/ipa-research-report.pdf

Regulation

While targets for waste segregation and biowaste collection are set out in national plans and roadmaps such as the National Waste Management Plan for a Circular Economy, as well as EU and international commitments such as the SDGs. The cold face of achieving these plans is left with private waste collections companies. For instance under the Permit section 'household waste collections' the permit holder is required to "implement and maintain an ongoing and up-todate-programme of communication and education", we believe that there is significant work to be done by waste service providers in engaging, communicating with customers, as they are the first and often only point of contact between individuals and the national aims and targets set out for recycling and waste reduction. While there is some level of control exerted through the waste presentation and collection byelaws, and through the national agency the NWCPO. Differing levels of communication are given to householders or businesses to support the changing of habits, or indeed support the national targets. The new 'recycling list' represented a holistic attempt to coordinate messaging, however anecdotally there are still reports of service operators giving differing information and pricing signals to customers. Ensuring that the messaging and education here is strong and effective and working towards the national plans is key to a successful system. Anecdotally most companies, issue guidance on joining and then refer customers to their website for information on recycling there after.

Data and decision making.

Waste collection weight data is reported to the NWCPO on an annual basis it is later validated before being published. Data is reported by company, and then collection. Making aggregate data for a region/town/community/area difficult if not impossible. Regular bin audits conducted by the EPA give averaged national level data on waste quantities and segregation levels, but are difficult to apply to community level initiatives to measure impact.

This has been highlighted as a significant barrier to community level waste reduction interventions (where pre/post intervention data can be exceedingly difficult to obtain to measure impact), and specifically has meant that application of international standards or accreditation, such as the Zero Waste Municipalities certification, is currently inoperable for Ireland[9].

[9] https://zerowasteeurope.eu/library/the-state-of-zero-waste-municipalities-5th-edition/ it is worth noting that VOICE are examining alternative measurements that would allow us to bring this form of accreditation to Ireland.

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Similarly, the variations in branding, colours and symbols across multiple companies within the same market have lead to significant confusion among householders and businesses. Research from VOICE has showed this sort of confusion actively discourages householders from sorting waste, specifically those in rented accommodation as any move will likely mean a new bin layout and system[10] (for example newly instituted compost bins nationally are typically Green or brown, while recycling bins may be Blue, green, red, or purple). While there has been some discussion on standardising of bin colours across companies, this has not been forthcoming.

This level of confusion and lack of coordinated messaging across a geographic area significantly hampers local authority or community campaigns and drives to address waste segregation. By contrast initiatives such as RELONDON ‘Making recycling work for people in flats’ project shows what can be achieved through area level campaigns[11].

Please find attached responses to each of the questions posed.

Waste collection services are there to support us as a society to live in a cleaner healthier environment. We have come a long way in Ireland, from the introduction of waste collection systems in the late 90s, to deceasing our reliance on landfill. We must now continue this journey and look to approaches that will reduce our waste generation in the first instance moving up the waste hierarchy towards Prevention and Reuse.

VOICE welcome this review on the waste collection market, and look forward to advancements in this area that will support Ireland to become a more sustainable and circular society.

Kind regards,

Tad Kirakowski
CEO, VOICE.

[10]https://www.voiceireland.org/campaign/use
[11]https://relondon.gov.uk/resources/report-making-recycling-work-for-people-in-flats-2-0

1 Recycling Rates

1. Ireland has yet to meet EU municipal recycling targets, what are the key barriers to achieving municipal waste recycling rate targets?

• Increasing waste generation rates are increasing the volume of material that needs to be sorted, Packaging design : Packaging complexity is decreasing the recyclability.

• There is a need to address design and ensure hat EPR systems are addressing upstream waste issues.

• Confusion re bin messaging; differing bin colours, labeling, collection dates within a single area leads yo confusion and becomes a behavioral barrier to waste segregation.

• Data access and feedback : A lack of any feedback, or any live data to help target measures that will ensure that messaging can be targetted or repeat offenders or black spots addressed.

2. Are the recent policy interventions enough to facilitate the achievement of Ireland's EU municipal waste recycling targets?

• To date no – as waste generation is increasing, leading to more waste to be sorted by householders.

• Uptake of the DRS show a willingness to embrace novel collections schemes, which need to grow to include direct re-use.

• Bans on certain items have proven to have a long lead in time (see complaint o the EPA in December 2023, submitted by VOICE), and in many cases not enacted at all, eg, levee on single use cups.

• Households are now largely able to access biowaste collection, but uptake and use of these remains low to date.

• Waste segregation bye laws amendments in 2022, did however clarify waste collection for apartments. While bringing business waste collection in line with household are also measures to be welcomed, though significant work in engaging with businesses on the use of the 3 bin system remains to be done to see the benefit of this change.

3. Are there any other interventions that should be considered to drive the achievement of

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Ireland's EU municipal waste recycling rates?

• Revision of the existing EPR schemes,placing the full cost of waste on producers, and creating upstream incentives to reduce waste generation in the first instance.

• Support for and encouragement of the reuse and repair sector across a range of materials, from re-usable packaging, selling loose and refillable alternatives. Also supporting waste avoidance behaviors.

• Communication change, a move away from 'waste collection' or even 'recycling services' toward material recovery. Framing the discussion as one on resource recovery rather than waste disposal will support a mindset shift in companies, who now need to align with a new messaging, as well as service users engaging in a new material recovery service.

4. What pathways should be considered to achieve municipal recycling targets to ensure value for money?

• Any approach needs to address upstream issues – primarily the material placed on market. This needs to be monomaterial, easily recyclable at very least. Applying fines/incentives to collectors for missing/achieving targets in a full side by side competition market, would incentivise companies to address their collection stream, but would rely on quality and timely data collection.

• Examining potential for increased municipal level involvement in waste collection services can increase consolidated messaging in an area, and allow for alternative collection systems that would reduce on street clutter and bag litter.

5. What potential technological solutions should be considered to achieve greater recycling rates?

• Monitoring and reporting of data – bin lift data exists as is, this needs to be improved, to closer to real time tracking, rather than the current situation of a delay of 18 months. This would allow for tracking of bin lifts and weights across fractions and allow incentivisation of companies to encourage greater segregation.

• Ensure that packaging is simplified to ensure ease of recycling where it is unavoidable

• The DRS is showing itself effective at increasing collection rates, where problematic materials remain examining DRS alternatives for the material either as direct re-use or for recycling where apprporiate.

6. Are adequate investments being made to ensure the achievement of future municipal and packaging waste recycling targets? What additional supports can be put in place to support further investment?

• Waste generation per capita is increasing and householders are sorting an increase volume of waste each year. This is showing in stagnating and reducing waste segregation rates.

• Enforcement investment ; on collection licensees to ensure compliance and supporting national plans for waste segregation and reduction and on monitoring banned items.

• Reuse and refill packaging alternatives investments and supporting

7. Are there different solutions for increasing waste recycling targets in the household and non-household sectors?

• Yes, though within a side by side competition sector they both rely on pricing signals and ensuring they are adequate to achieve the outcomes.

• Standardisation of bin colours and imagery may decrease confusion, while simplification of packaging will increase the 'ease' of recycling.

• In a business setting marginal price differences will not incentive staff training and time input required in many cases, particularly with seasonal staff.

• Householders are not currently being offered value for money over and above other market formations, and the market appears difficult and confusing with two national reports finding the current market pricing is 'complicated'. This is highlighted by the lack of any comparison service online to estimate best plans for householders, as is usual for broadband, TV or other utilities, bearing more in common with health insurance offers.

2 Municipal Waste Collection Services

8. What are the benefits of the current municipal waste collection services that have contributed to our recycling rates to date?

• It has ensured that there is door to door collection across the country, with moderate success in the roll out of the brown bins.

• The current model does make individuals broadly aware of the cost of waste management in the home, a fully socialised service with a flat bin charge may encourage dumping and may be difficult to encourage waste segregation on a granular level.

• Side by side competition has failed to achieve value for money for users over and above other service provision models.

• The current model makes tracking of dumping and responsibility attribution more difficult.

• The current model makes shared bins more difficult to manage, with barriers to effective storage of waste in inner city and urban areas, where wheely bins are difficult to store.

9. Is there a need to change the current municipal waste collection services to improve recycling rates?

• Yes. As above, reframing the industries primary role from one of waste collection to material management in and of itself would change the mindset and mandate of the companies. At the very least there is a need to tie achievement of targets to the ability to operate and hold a licence.

10. What is the best way of providing a high-quality waste collection service while minimising operational costs and providing fair working conditions?

- reduce waste generation in the first instance, waste per person is growing, the average person is sorting more material per week, almost 20% over the last 5 years. Achieving the same results with 20% more material highlights that householders are doing more work. This is likely to lead to a breaking point.

The intro of the DRS highlgihts that the public is willing to adopt a new behavior quickly in respect to waste and the banning of single use vapes and growth of cup free towns shows that public opinion is against difficult waste items.

The IPA1 studies show that for cities like Dublin, there is little price impact for users, and low impact on employement levels when instituted in the correct manner – this may be setting district boundries to relatively small areas for example.

11. Are prices and quality of the service equitable for different social groups or geographic areas?

There is no clear data on this to be able to adequately measure pricing comparatives.

The roll out of the DRS highlights rural areas underserved with access to reverse vending machines.

Rural areas were typically among the last to receive biowaste collection sesrvices.

Workshops, and community engagements undertaken by VOICE anecdotally support an increased level of dependance on civic amenity sites for rural areas across the country, rather than direct access to a waste collection service.

Apartment bin areas are typically underserved with many not having access to biowaste, little to no signage, and with sporadic roll out of information campaigns and services (eg in unit bin caddies for biowaste), resulting in high contamination rates at the bin areas.

Those renting typically have no say in their waste collection service, as this is managed by the management company for the property.

12. Are there any specific issues with the current charging structure for consumers? If so, please provide a breakdown.

Pricing & Efficiencies

Lack of price transparency: Pricing is complex and not easily accessible; no price comparison tools exist for waste services. Numerous reports have examined the pricing and found it to be difficult to compare.

Pricing for householders does not appear to be incentivising waste segregation sufficiently while businesses, particularly busy customer facing businesses note that the volumes versus staff time are often a limiting factor when considering value for money in segregation.

Operational inefficiencies: Multiple waste trucks from different companies in the same area increase carbon emissions and traffic.

Infrastructure limitations: In areas like Dublin city, fragmented service provision hinders the implementation of shared or underground bin solutions.

2. Regulation

Fragmented responsibility: National targets exist (e.g., for biowaste), but implementation is left to private companies with inconsistent support and communication.

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Inconsistent messaging: Despite efforts like the national recycling list and the work of mywaste.ie service providers often give conflicting information, undermining public understanding and compliance.

3. Data & Decision-Making

Limited data granularity: Waste data is reported annually by company, making it hard to assess local-level performance or support community initiatives.

Barrier to certification: Lack of detailed data prevents Ireland from adopting international standards like Zero Waste Municipalities.

Visual confusion: Inconsistent bin colors and branding across providers confuse users, especially renters, and hinder waste sorting efforts.

Missed opportunities: Unlike coordinated area-level campaigns (e.g., RELONDON), Ireland lacks unified local strategies due to fragmented service and messaging.