Submission	Response
Proinsias Mac Fhlannchadha – No Organisation	The purpose of the consultation is to provide for submissions relating to the proposed
Fines -The Fixed Notice Penalty of €75 is not	amendment of the Dublin City Waste Bye Laws
much of a deterrent to compliance, particularly	that seeks to introduce a regulation and
for large complexes (less than the lift of one	methodology for the use of specific alternative
bin). This is something that should be increased substantially to avoid having to go through the	waste containers in specific areas of the city.
courts.	The submission does not address the specific areas that are proposed to be amended and are
Action - The fine should altered to €75 per day	the sole and specific subject of the consultation
of non-registration with an authorised waste collector and/or non-compliance with	process.
providing segregated waste bins.	
This €75 per day fine should also be levied on	
Directors, as agents of management	
companies. Where there are third party	
property managers in place, these companies should also be subject to a daily €75 fine where	
instances of non-compliance are observed.	
instances of non-compliance are observed.	
Recommendation: No alteration to proposed	Amendment: None
amendment	

Proinsias Mac Fhlannchadha - No Organisation

Dear sir/madam,

I am writing to you in relation to a submission on the rights and responsibilities of landlords. As set out under the Housing (Stan+-]dards for Rented Houses) Regulations 2017 " The house shall have access to suitable and adequate pest and vermin proof refuse storage facilities."

Whilst the onus is on the landlord to provide the required bins, there is no onus on the landlord to provide the required infrastructure internally in units to adequately segregate waste in order for tenants to adhere to the various bye-laws around the country, which requires waste to be adequately segregated (see https://www.mywaste.ie/my-household-waste-bye-laws/). As far as I am aware it is the obligation of the tenant to be in compliance with the Bye-Laws.

This lack of basic multi-segment bins within units is a contributory factor in which leads to poor rates of recovery from materials and also contamination of waste streams due to impediments being put placed on tenants. Please see the attached infographic which has been prepared by the DCCAE as part of their current public consultations which confirms this. A simple solution to this would be that the landlord is required to provide segmented waste bins internally for Black, Green and Brown Bins. This wouldn't require a massive investment from landlords and could be stipulated by way of bye law to be in place for all new tenancies to give people adequate time to upgrade their waste bins. Brown Bins could be a small caddy as opposed to a stand-alone

I hope that DCC would consider and see the merit in amending the obligations of Landlords by way of bye law to factor in the above measures to improve the levels of recycling, diversion from landfill and recovery of materials which can be impeded by not having adequate bins within units.

Response

The purpose of the consultation is to provide for submissions relating to the proposed amendment of the Dublin City Waste Bye Laws that seeks to introduce a regulation and methodology for the use of specific alternative waste containers in specific areas of the city.

The submission does not address the specific areas that are proposed to be amended and are the sole and specific subject of the consultation process.

Recommendation: No alteration to proposed amendment

Vinnie Hall – No Organisation

Hello,

I am concerned as to the creation and maintenance of scheduled areas in Dublin, particularly in view of the existence of elderly, disabled or other individuals who may have difficulty manipulating large/inflexible containers, as opposed to approved bags, who may be living in these areas.

There is also the issue of these large/inflexible objects obstructing street users, especially those with prams or assistive devices.

Additionally, some areas do not have sufficient outdoor space to store containers.

It reduces to the following: Can containers be handled by everyone in a given area? yes/no

Is there sufficient streetscape space such that containers placed for collection, or awaiting return to the owner do not obstruct? yes/no

Do households have a safe storage area for containers as they are being filled, such that pavements etc. are not obstructed? yes/no

You will find that the key issues iinvolve producing less waste in the first place, not disposing of it. That is where the work of DCC should begin.

There are almost NO streets in the city centre of Dublin that are suited to large/inflexible waste containers of any sort. The streets are already over furnished with signage, bins, begging boards, cafe seating and human waste., apart from litter and drug paraphernalia. It is difficult to navigate all of these as it is, particularly if one is elederly, blind, mobility impaired, pregnant, carrying/wheeling child/ren, lugging groceries/luggage and etc.

Recommendation: No alteration to proposed amendment

Response

The purpose of the consultation is to provide for submissions relating to the proposed amendment of the Dublin City Waste Bye Laws that seeks to introduce a regulation and methodology for the use of specific alternative waste containers in specific areas of the city.

The submission refers to the availability of space for any container as an alternative to bags and the ability to handle such containers.

It is the purpose of the amendment to allow for Dublin City Council to trial, introduce and regulate any such container.

It is with regard to the ability to store, manage and use successfully such containers that Dublin City Council will consider the approval for any proposed container.

It is further noted that while the submission makes the point of availability of space that waste bags also require space for both storage and presentation and the nature of plastic bags is that multiple bags require significant space for presentation.

Marc Hussey – No Organisation

Thank you for the opportunity to make this submission.

INTRODUCTION

Waste Collection in the Fitzwilliam Dublin 2 area is wholly unsatisfactory. The general volume of street litter, much of it originating from official refuse bags torn open and contents scattered, is unacceptable, especially in an important heritage/tourist area. As a resident, I spend too much time cleaning rubbish blown into the street area in front of the house or into the basement stairwell.

Dublin City has an opportunity to revamp the system to make it work better for all and be best in class across capital cities.

ISSUES AND RECOMMENDATIONS

The specific observations and suggested fixes are as follows:

First, collection dates are scattered and difficult to follow. Different operators have different pick-up days for different refuse types and different weeks which change each month. Very difficult to track and follow. As an example, Keywaste will designate days to collect general waste, and other days to collect both general and recycling waste. The collection dates also vary each month. So rubbish bags are often left out at wrong times, go uncollected, then frequently torn open and contents scattered. The fix is to simplify collection dates with all providers, and insist a wide type of rubbish be collected on the same days each month.

Second, the current system is not user friendly and lacks easy access to information to make it work. The area has a diverse number of commercial and residential occupants with a resulting reasonable degree of people turnover. So new occupants are unaware of refuse disposal system in the area. There is no ongoing education to inform them of the protocols. Google search "fitzwilliam street

Response

The purpose of the consultation is to provide for submissions relating to the proposed amendment of the Dublin City Waste Bye Laws that seeks to introduce a regulation and methodology for the use of specific alternative waste containers in specific areas of the city.

The submission makes a number of comments and suggestions outside of the specific areas that are proposed to be amended and are the sole and specific subject of the consultation process.

The submission further refers to the use of alternatives to the use of plastic bags for waste presentation which would appear to be in agreement in principle with the proposed amendment.

dublin refuse collection dates" or similar, and the top hit takes you to a website from Dublin City Council announcing the 2012 termination of refuse collection services by Greyhound. Not relevant or helpful.

So occupants do not know who the waste collection providers and where to find them. Even if you locate a provider their websites are unhelpful. Look at the website of KeyWaste and there is little practical collection information relevant to the area. It would be easy for The Council to insist that all stakeholders provide a simple user-friendly webpage providing practical, collection information (and provide the same on its own website). The information must include (i) service providers in the area, (ii) simple to follow collection dates and times, (iii) information about where to buy collection bags locally, (iv) what to do if you have missed a collection dates (alternative collection points) and (iv) how to report littering.

Third, official refuse bags are generally not available from shops in the area. Keywaste's website is spectacularly unhelpful in telling residents where to purchase bags in the locality. It says bags are available at Woodies, B&Q etc., but none operate in the area! All waste providers must be required (i) to ensure all mini-markets locally (Spar, Tesco etc.) stock their bags and (ii) post on their websites an easy to use link to buy bags directly. Dublin City must also have a weblink showing where the bags can be bought.

Fourth, there are no local alteratives in the area for waste drop-off or recycling points. All the points available drop-off points are not within walking distance for residents to use. So there is no practical alternative to dispose of waste if you miss a scheduled collection. Residents have to wait another 1-2 weeks for the next collection. Waste is left in bags, left on the street, or stored in basement stairwells, or in rear areas in unsuitable plastic bags which are often ripped open by seagulls, rats etc. The City needs to provide small, practical local drop off and recycling points. Charge if necessary to ensure no abuse of the facilities. These

facilities do not require significant space and can be automated. Fifth, the use of plastic bags must stop. They not environmental friendly, and often ripped open by rats or seagulls and contents scattered blown. The wind often blows the bags themselves around. A simple fix will be to stop the use of the bags and replace with reusable 'mini'-wheely bins with a lid with same volume as the plastic bags but when left out for collection can eaily be clipped onto the top of the railings that front most houses in the area. Sixth, the street cleaning frequency in the area is not enough. The litter issues are compounded by all too infrequent cleaning with sweeping machines. On the main streets, there is an accumulation of rubbish between along the curb between the pavement and road which would not exist if sweeping frequency were increased. It is compounded by the Council having to work around parked cars - but this could be solved by posting alternative street parking requirements on the Saturday or Sunday when sweeping does take place. Finally, the cleaning machines do not cover all streets in the area. As an example, I have never seen them come into Baggot Court to clean. Happy to discuss further. Regards, Marc Hussey

Recommendation: No alteration to proposed

amendment

Submission	Response
Sara Moorhead – No Organisation	The submission appears in principle to be supportive of the proposed amendment.
i would be delighted to have bins. At present I have to buy bags as do many people on the lane. it is a huge litter problem.	
Recommendation: No alteration to proposed amendment	Amendment: None

Submission	Response
Patricia Carroll – No Organisation I am in favour of instituting bins instead of bags for waste on condition that the bins are not left out on the road. This must be policed by the council, as waste bins outside businesses as well as houses would be a dreadful eyesore.	The submission appears in principle to be supportive of the proposed amendment.
Recommendation: No alteration to proposed amendment	Amendment: None

Scarlet Merrill – No Organisation

Fees for bin collection should be deducted at source (in local property taxes) so people can't opt not to have bin collection and then get rid of their rubbish in the park, on the street, in MY bin, in the river, or local public bins (which are constantly overflowing, by the way; your app is nice but lots of people report that they use it and nothing happens). The rubbish situation is out of control because you've made it optional and private suppliers are expensive. To combat littering, you've been removing the few public bins on local streets, which is only making the situation worse. I regularly get bags of dog poo thrown into my front yard and while I deplore the act it hardly surprising seeing as there are so few bins around for people to drop these items in. I don't understand the entire approach to waste in this country, it's counterproductive and illogical. Then I see requests for tenders for "communications campaigns" about waste - this is not a communications issue but a lack of infrastructure. Put the infrastructure in and then the few people who continue to pollute (there will always be some) can be prosecuted. You won't talk them into compliance! People who would never litter in the first place don't need a communications campaign. The status quo doesn't work, please be brave enough to change it.

Response

The purpose of the consultation is to provide for submissions relating to the proposed amendment of the Dublin City Waste Bye Laws that seeks to introduce a regulation and methodology for the use of specific alternative waste containers in specific areas of the city.

The submission does not address the specific areas that are proposed to be amended and are the sole and specific subject of the consultation process.

Recommendation: No alteration to proposed amendment

Submission	Response
Pat Murphy – No Organisation	The purpose of the consultation is to provide
	for submissions relating to the proposed
Your consultation document mentions kerb	amendment of the Dublin City Waste Bye Laws
side multiple times. The public need to be	that seeks to introduce a regulation and
educated that bins are to be placed closet to	methodology for the use of specific alternative
the road kerbside.	waste containers in specific areas of the city.
On collection days on my road bins are strewn	
across the footpath some by the kerb side but	The submission does not address the specific
most are abandoned at the back of the	areas that are proposed to be amended and are
footpath closest to the houses.	the sole and specific subject of the consultation
This is where visually impaired people are	process.
trained to walk. This is where they now have to	
over come all the bins abandoned.	
Maybe you can contact the NCBI to confirm this and can you ask bin companies to launch a	
educational campaign to highlight this issue.	
Bin company employees also need to be	
educated as to where to leave the bins after	
collection as they also abandon the bins all	
across the footpath after emptying.	
and the company and the company and	
Recommendation: No alteration to proposed	Amendment: None
amendment	

Submission	Response
Gerard Farrell – Dublin Town	The submission appears in principle to be supportive of the proposed amendment.
In relation to the proposed ammendment to the Waste Management (Storage, Presentation and Segregation of Household and Commercial Waste) Bye-Laws 2018, DublinTown is supportive of trialling reusable containers in key areas of the city. We believe that such initiatives should be tested and from surveying a number of businesses there is clearly an appetite for the trailling of such initiatives.	
We believe, if successful, the trialled use of such containers could improve the appearance of key locations in the city centre and also prevent bags waste from attracting vermin or being tampered with.	
Recommendation: No alteration to proposed amendment	Amendment: None

Submission	Response
Simon Bailey – No Organisation I live in the inner city in a bag collection area. The current system leads to rubbish bags being ripped open by foxes and seagulls and rubbish strewn all over the street. I welcome any improvement in this situation. The proposed solutions must keep in mind that I do not have space indoors to keep a container such a wheelie bin. Perhaps a collapsible structure that could fold flat when not in use and would be easily cleaned.	The submission appears in principle to be supportive of the proposed amendment.
Recommendation: No alteration to proposed amendment	Amendment: None

Hugh Considine – No Organisation

Hi, My neighbour places their bins outside my property for collection and often in front of my door rather than outside their own property/door as they need space to park their car. It would be useful that there be an onus on residents to present their bins outside their property and not in front of other resident's property. The section 2.3 below in the proposed bye laws is difficult to understand and does not appear to make any reference to the location private residents should present their bins for collection having regard to neighbours property.

2.3. Location for container storage
Other than on the day before and the
designated waste collection day outside the
Central Commercial District and on the
designated waste collection day only within the
Central Commercial District, containers used for
the presentation of kerbside waste shall be
held within the curtilage of the premises where
the waste is produced. They shall not be stored
on a roadway, footway, footpath or any other
public place unless the location has been
expressly authorised in writing by an authorised
person.

Response

The purpose of the consultation is to provide for submissions relating to the proposed amendment of the Dublin City Waste Bye Laws that seeks to introduce a regulation and methodology for the use of specific alternative waste containers in specific areas of the city.

The submission does not address the specific areas that are proposed to be amended and are the sole and specific subject of the consultation process.

Recommendation: No alteration to proposed	Amendment: None
amendment	