



Litter Management Plan (2020 – 2022)

It is a statutory function of Dublin City Council as provided for in section 10 of the Litter Pollution Acts 1997 – 2009 to make and implement a Litter Management Plan in respect of its administrative area. The adoption of the plan is a reserved function of the City Council.

The current plan was adopted in March 2016 and ran to date. A fundamental review of the current plan has been carried out with the objective of developing a new plan for the period 2020 – 2022.

A Draft Litter Management Plan 2020 -2022 was prepared and presented to the Climate Action, Energy and Strategic Policy Committee on the 27th November 2019 which recommended that the Draft Plan be put out for statutory public consultation which was subsequently approved at the January meeting of the City Council.

The statutory public consultation began on 24th February 2020 for a period of six weeks.

A further period of non-statutory public consultation was entered into to take account of the Covid 19 issues and restrictions which ended 22nd June 2020.

Consultation Overview

The statutory public consultation period for the litter management plan was initially provided for a 6 week period between February and April 2020 concluding on the 6th April.

Given the unprecedented situation that occurred in and around the same period with the implementation of various restrictions in respect of the emergence of Covid 19 in Ireland the consultation period was extended for a further period until the 22nd June.

During the consultation period 67 submissions were received from the public, business representative groups, community and environmental groups and elected representatives. 2 submissions were received in the week of the 22nd June and these were also considered in the following report.

Submissions Overview

The submissions contained a large number of comments, observations, queries and recommendations in relation to the plan.

The areas covered in the submissions were wide ranging and demonstrated an engagement with the plan and interest in ensuring that the plan provides appropriate

measures to address issues relating to litter in Dublin City. Many of the suggestions are useful, interesting, innovative and are extremely worthy of consideration and development in the implementation of the plan.

Each of the submissions has been addressed in relation to the various points raised. The submissions are provided in full in the documents accompanying this report and a full summary of the submissions received during the public consultation periods is provided as an appendix to this report. Responses to each of the points made in the submissions are provided and any recommendations for amendments to the plan.

The following points suggest how the submissions and the various suggestions made are to be addressed in the context of ensuring the plan is in line with the provisions and scope of its statutory basis and that it remains a relevant strategy and plan for the management of litter in the city.

1. In addressing the submissions many suggestions have been noted as having relevance to specific internal departments or external stakeholders. It is suggested that these will be compiled for referral to be considered appropriately by the appropriate department, division, operational area or body.

These include:

- Issues specific to local areas.
- Issues specific to the management of local parks and green areas
- Issue specific to the activities of other internal departments
- Issues relevant to external stakeholders such as waterways bodies or An Taisce

2. There are a large number of suggestions, queries and recommendations that can be addressed through the aims and objectives that are set out in the plan and it is recommended that these be progressed in this way in the implementation of the plan and reported on in the annual progress report of the plan to this committee.

These include:

- Suggestions on the range and type of open data made available.
- Suggestions on how to progress engagement with communities and schools.
- Suggestions on how to improve communications and access to information.
- Suggestions on reporting on progress of the plan.

3. There are also a large number of suggestions and recommendations that go beyond the scope of the plan in respect of its legislative provision and basis. While these suggestions may have merit they cannot be incorporated into the plan.

These include:

- Structure and regulation of the waste market and industry.
- Provision of waste infrastructure.
- Implementation of initiatives and programmes that require amendments to primary legislation that is not the Litter Pollution Act.

Amendments to the Draft Plan

A number of submissions made valuable and relevant points regarding the content, aims and objectives of the plan that could not be addressed within the existing content and objectives of the draft plan. These did fall within the legislative scope of the plan and were not relevant for referral for consideration to other departments or stakeholders. These suggestions are addressed by way of proposed amendments to the plan.

The amendments made to the draft plan are listed below in tabular form for ease of reference.

1.

Recommendation: Amend Plan at Pg 24.
Amendment: amend heading to: Management of Domestic and Commercial Waste Insert Additional Bullet Point <ul style="list-style-type: none"> • Dublin City Council will seek to trial and implement alternative solutions to waste presentation in plastic refuse bags

2.

Recommendation: Amend Plan to include Baseline Metric indicators to be included for all objectives of the implementation Plan where appropriate
Amendment: Insertion of Baseline metrics to objectives where applicable on pages 25 – 29.

3.

Recommendation: Amend Plan to include <ol style="list-style-type: none"> 1. Additional appendix – Final report on Litter Management Plan 2016 – 2018 2. Amend plan at pg 2 to reference the Dublin City Climate Action Plan, Eastern Midland Regional Waste Plan and UN Sustainable Development Goals.

Amendment:

1. **Include Appendix – Report on Litter Management Plan 2016 – 2018**
2. **Pg 2. Insert text: The Litter Management Plan 2020 – 2022 is formulated having regard to the shared goals of the Dublin City Climate Action Plan, the Eastern Midland Regional Waste Management Plan and the UN Sustainable Development Goals. The plan contains actions and objectives that can contribute to positive climate outcomes, waste reduction and increases in recycling and reuse.**

4.

Recommendation: **Amendment to plan at pg 24 and pg 29**

Amendment:

Pg 24.

Insert Additional Bullet Point:

- **Dublin City Council will consider whether it is possible to create and maintain up to date records based on information such as eircodes on the domestic and commercial waste collections and civic amenity site use for the purposes of ensuring compliance with requirement to use authorised waste collectors.**

Pg 29

Insert New Objective

- **Carry out review and update of Litter Prevention and Control Bye Laws.**

5.

Recommendation: **Amend plan at pg1 and pg 30 and also at implementation plan**

Amendment: **Insert paragraph at pg 1 – definition of litter and responsibilities**

Pg 30 Promotion of the plan will be undertaken

Implementation plan include additional objective:

- **Develop liaison with primary and secondary schools on litter education including providing an updated and distribute Litter Education Packs to schools**

6.

Recommendation: **Amend plan at pg.19**

Amendment: **insert new bullet point under heading – Recycling Infrastructure**

- **Dublin City Council will examine how it can engage with initiatives such as Terracycle to promote recycling of additional waste streams.**

7.

Recommendation: **Amend plan throughout to address any formatting on syntax errors**

Amendment: **Various amendments to formatting and syntax to ensure consistency throughout the plan**

8.

Recommendation: **Amend plan at pg 22**

Amendment: **Insert sentence under heading Blue Spaces**

Dublin City Council will consider the issue of provision of litterbins in proximity to waterways.

9.

Recommendation: **Amend plan at pg 23**

Amendment: **Insert new Header and sentence**

Accessibility

Dublin City Council will carry out an accessibility audit on its litter, waste and recycling infrastructure to identify and address issues.

Review and Assessment of the Submissions

A revised plan including the amendments set out above which took account of the submissions received and included a full report on the public consultation and the submissions received was presented to the Climate Action, Environment and Energy Strategic Policy Committee on 26th October 2020. The Committee requested the addition of ***A portal or set of webpages on the Council website, with centralised litter management data included up-to-date statistics, mapping, and information on littering*** which is now reflected in the plan attached.

Recommendation

It is therefore recommended that the Litter Management Plan 2020 -2022 is adopted by the City Council.

John Flanagan

Assistant Chief Executive and City Engineer

7th December 2020

Appendix 1. Summary of Submissions and Responses

Name /Group: Donnybrook Tidy Towns Ref: LMP/STAT 001	
Submission: Observations on locating of public litter bins and community involvement Observation on leaf composting and community involvement Positive observation on use of QR codes Observation welcoming upgrade of CRM Observation on plans to introduce online resource for street cleaning schedules	Response: Dublin City Council work closely with local area offices and local representative groups when planning provision of infrastructure. Dublin City Council intends expanding where possible composting of leaves to involve communities where possible to do so. No response required. No response required. This tool will be available as a tool for the public to be able to check cleaning schedules and activities.
Recommendation: No amendment to plan.	
Amendment: None.	

Name /Group: Senator David Norris
Ref: LMP/STAT 002

Submission:
Observation on the compulsory use of thin plastic bags for waste presentation. Specific Reference to North Great Georges St.

Response:
Dublin City Council is currently examining ways to address the use of plastic bags for waste presentation and is also seeking to amend its waste bye laws to empower it to legislate for the use of alternatives. The plan will be amended to reflect this.

Similarly Dublin City Council is also examining the use of communal bins through its Dublin City Beta Project.

Recommendation: Amend Plan at Pg 24.

Amendment:
amend heading to:
Management of Domestic and Commercial Waste

Insert Additional Bullet Point

- **Dublin City Council will seek to trial and implement alternative solutions to waste presentation in plastic refuse bags**

Name /Group: Minister Richard Bruton	
Ref: LMP/STAT 003	
Submission:	Response:
<p>Observation on including additional Key Performance Indicators including baseline indicators.</p>	<p>Baseline Metric indicators will be included for all objectives of the implementation Plan.</p>
<p>Observation on inclusion of definite targets for issues such as Single Use Items / Bin the Butt and introduction of recycling to apartment complexes.</p>	<p>Dublin City Council is working towards the complete elimination of single use items in all of its activities and work locations. This also includes events and activations within public spaces that the City Council permits or licences.</p> <p>As the issue is a national issue there are many areas where the City Council can exert influence but cannot impose restrictions on.</p> <p>The provision of recycling facilities in private developments is desirable in all instances but is ultimately a matter for the city development plan and planning department. It is stated within the plan that it will be sought to have recycling facilities included in all large developments in the city through the provisions of the development plan.</p>
Recommendation: Baseline Metric indicators to be included for all objectives of the implementation Plan.	
Amendment: Insertion of Baseline metrics to objectives where applicable on pages 25 – 29.	

Name /Group: Gwen O'Dowd	
Ref: LMP/STAT 004	
Submission: Observation on the issue of illegal dumping in the environs of Great Western Way, D7. Notes CCTV may be an effective deterrent.	Response: The issue of combatting illegal dumping through a variety of enforcement measures is dealt with in the draft under a number of areas including Enforcement / Illegal dumping and Management of Domestic Waste and associated objectives 27 / 28 / 30 / 31 /34.
Recommendation: No amendment to plan.	
Amendment: None.	

<p>Name /Group: Brian Sheehan</p> <p>Ref: LMP/STAT 005</p>	
<p>Submission: A wide ranging and detailed submission on all aspects of the plan making a variety of observations and recommendations.</p> <p>The plan is not linked to the Climate Action Plan or the Eastern Midland Regional Waste Plan.</p> <p>There is no mention of a strategic environmental assessment of the plan being carried out.</p> <p>There is no reference to the UN sustainable development goals in the plan.</p> <p>The plan should set out SMART goals for specific areas.</p> <p>It would be useful to report on the performance indicators for previous plans.</p> <p>Install additional high capacity bins in proximity to Croke Park.</p>	<p>Response:</p> <p>The plan is formulated with regard to objectives and actions of the Dublin City Council Climate Action Plan and Circular economy goals and there are shared objective such as actions on single use plastics and composting of organic street cleaning waste and the introduction of segregated recycling bins on street. The connection and interrelated nature of the plans may not be clearly stated and this will be rectified by amendment.</p> <p>Dublin City Council do not believe that a SEA is required for a Litter Management Plan. Screening is being carried out in order to confirm the position.</p> <p>This will be rectified in the plan by amendment to refer to the relevant sustainable development goals.</p> <p>The plan sets out within the implementation plan a number of objectives in each area with associated measurements of the success of these objectives as well as KPI'S for the plan overall and a variety of stated aims within the plan .</p> <p>Previous plans have all provided detailed update reports including statistics on KPI's on an annual basis as is required for the plan. The final annual report of the previous plan will be included as an appendix to the current plan.</p> <p>This suggestion will be considered in the context of the criteria for the</p>

<p>Rate of replacement of bins is not clearly defined in implementation plan.</p> <p>Propose greater integration of fix your street / see it say it app and QR codes.</p> <p>Better cleaning required for certain local areas and defined cleaning schedules for these locations.</p> <p>Expand boundaries of city centre cleaning regime to enhance cleaning of additional areas.</p> <p>the provision of underground recycling bins and cardboard recycling facilities at bring locations.</p> <p>Make underground recycling facilities mandatory at new apt developments.</p> <p>Consider the use of smart bins as part of segregated bin trial. Consider the trialling of an environmental district such as Mountjoy Square where new initiatives could be implemented.</p>	<p>installation of litter bins and the ongoing replacement and upgrade programme and will be based on a local assessment of need.</p> <p>Amend implementation plan to address this issue.</p> <p>Dublin City Council supports the use of Fix Your Street and See it Say It through the existing CRM system.</p> <p>Local operations management define cleaning schedule for areas within a locality that require additional attention over and above day to day cleaning schedules and implement these working in conjunction with local area offices and public domain units.</p> <p>The Waste Management Division keep the cleaning boundaries under constant review and adjustments are made as required to ensure that high standards of cleaning are delivered as appropriate to all areas.</p> <p>The Waste Management Division has examined the feasibility of providing underground recycling facilities. The footprint of bring locations would not facilitate the provision of additional cardboard recycling. Unlike glass or textiles mixed dry recycling collections are available at kerbside for all households and free of charge in all bring centres and civic amenity sites.</p> <p>This is beyond the scope of the plan and legislative provisions. The plan clearly sets out the intention to recommend the provision of recycling facilities in all new developments. The use of smart bins forms part of the segregated bin trial project. While there is merit in this suggestion, there are mechanisms already in place for the trialling of new initiatives such as BETA and it may not be desirable to concentrate activity into a single</p>
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<p>Consider a bin sponsorship trial where smart bins replace standard bins.</p>	<p>location.</p>
<p>Investigate Green exchange programme such as those operating in Brazil.</p>	<p>Dublin City Council are considering the sponsorship of bins based on any proposals received.</p>
<p>Expand Team Dublin Clean up to a 3 times a year event.</p>	<p>This suggestion will be referred to the environmental awareness officer for consideration.</p>
<p>Set a response time for dealing with customer requests.</p>	<p>It is not considered that this is viable. Dublin City Council supports a very large number of community clean ups and volunteer led initiatives throughout the year that take place at regular intervals. Coordinating all groups to take part in 3 annual events in addition to regular scheduled events would not be successful and would most likely dilute the success of the initiative.</p>
<p>Suggestion for awareness campaign around illegal dumping messaging.</p>	<p>Dublin City Council Waste Management Services strive to address all customer requests within 24 hours.</p>
<p>Consider introducing communal underground bins in the city.</p>	<p>This will be considered in the development of future awareness campaigns.</p>
<p>Dublin City Council to resume control of waste collection in Dublin City.</p>	<p>Dublin City Council through the Dublin City BETA programme are currently engaged in a project to trial communal bins in the city. Underground bins will be considered in the context of this trial.</p>
<p>Address issues relating to landlord properties and tenants dumping.</p>	<p>This is beyond the scope of the legislative provisions of the plan.</p>
<p>Carry out enforcement in relation to overloaded bins.</p>	<p>Dublin City Council is examining issues relating to the treatment of domestic waste issues in the private rented sector.</p>
<p>Include report on BETA waste projects within the plan.</p>	<p>Dublin City Council will enforce the provisions of the Waste Bye Laws and Litter Pollution Act wherever possible. Various aims and objectives relating to enforcement are outlined in the plan.</p>
	<p>Reports on the progress of BETA</p>

<p>Adopt an interim one year plan and redraft a new plan thereafter to be more ambitious consulting with international expertise suggested to create a plan for 2021 -23</p>	<p>waste projects will be included in the updates and annual reporting of the plan to Dublin City Council.</p> <p>This is not recommended. It should be noted that national and international initiatives and experiences are identified and researched during the development of the plan.</p>
<p>Recommendation: Amend Plan to include</p> <ul style="list-style-type: none"> 3. Additional appendix – Final report on Litter Management Plan 2016 – 2018 4. Amend plan at pg 2 to reference the Dublin City Climate Action Plan, Eastern Midland Regional Waste Plan and UN Sustainable Development Goals. 	
<p>Amendment: Include Appendix – Report on Litter Management Plan 2016 – 2018</p> <p>Pg 2. The Litter Management Plan 2020 – 2022 is formulated having regard to the shared goals of the Dublin City Climate Action Plan, the Eastern Midland Regional Waste Management Plan and the UN Sustainable Development Goals. The plan contains actions and objectives that can contribute to positive climate outcomes, waste reduction and increases in recycling and reuse.</p>	

<p>Name /Group: DublinTown</p> <p>Ref: LMP/STAT006</p>	
<p>Submission: Street Washing – recommendation to invest in additional street washing equipment and focus on highest profile streets</p>	<p>Response: Dublin City Council has recently conducted a trial of new street washing equipment and maintains a fleet of high quality specific street cleaning machinery and vehicles. The Waste management Division continuously invests in ensuring that the fleet and equipment in use is of the highest standard to provide cleaning services to the city.</p> <p>The highest profile streets in the city centre are those that are prioritised for washing particularly during prolonged spells of dry weather in the city.</p>
<p>Dog Fouling – submission notes the issue is relevant to the core business district and that dog fouling programmes, information and advertising campaigns be used to promote dog fouling bins and their use and also enforcement</p>	<p>Any bin may be used to dispose of dog fouling and the provision of foul specific bins is not recommended for the city centre where there is an ample supply of litter bins including standard and solar compactor bins. It is a stated aim of the plan to combat dog fouling through the use of media information and education campaigns and to target enforcement activities at the issue.</p>
<p>Waste Segregation –Submission suggests the introduction segregated bins including the provision of compost bins for organic waste. The submission also suggests increased usage of smart bins in the city centre</p>	<p>The Draft Plan states that Dublin City Council will trial the use segregated bins, a pilot project is in development that includes the trialling of organic waste and the use of smart bins within the trial.</p>
<p>Waste Collection – submission refers to the feasibility and legal implications of tendering for waste collection service s and associated issue such as collection times and appropriate size of collection vehicles</p>	<p>These issues are noted however they are beyond the legislative scope of a Litter Management Plan and are not applicable to related waste or litter bye-laws.</p>

<p>Submission is supportive of the introduction of reusable waste containers to replace the use of plastic bags.</p> <p>Education and Policy – Submission observes that business may feel more likely to be fined for littering or bye law offences than members of the public and encourages greater use of litter wardens in the city centre and publication of names of those caught littering</p> <p>Abandoned bicycles - Submission notes that the removal of abandoned bicycles could be increased</p>	<p>Dublin City Council is engaged in market consultation and the proposed amendment of bye-laws to achieve this.</p> <p>As the enforcement of bye-laws in the city centre is focused on the storage, presentation and segregation of waste it is clear that the commercial entities will make up the majority of those subject to enforcement notices. It is the aim of Dublin City Council to focus more litter warden activity in the central commercial district. It is not legally possible to publish to names of those subject to fixed penalty notices or prosecutions for littering offences.</p> <p>Dublin City Council has recently been awarded additional funding under the Anti-Dumping initiative 2020 to increase the abandoned bicycle service provision</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Abi Cassidy</p> <p>Ref: LMP/STAT 007</p>	
<p>Submission: Submission makes observations on the following issues:</p> <p>Equipment of cleaning staff. High standards of cleaning to be maintained. Identify why there are differences in cleanliness of areas after cleaning has taken place. No litter left behind following cleaning</p> <p>Authorised collectors to be reminded not to allow spillages from waste collection and clean up in the event of any incidents.</p> <p>Introduction of DNA ID for all dogs.</p> <p>Reduce the number of horses kept for leisure purposes in the Dublin City area to address the issue of horse manure as litter.</p> <p>Presentation of waste on incorrect days due to ignorance of collection days.</p> <p>Presentation of untagged waste bags.</p>	<p>Response:</p> <p>All staff have appropriate equipment available for use at all times. The street grading programme has been designed to ensure high standards of cleaning are maintained and ensure consistency of cleaning standards. The programme includes comparisons of cleaning standards and graded results that are assessed and addressed with local management teams. The plan notes that the grading programme will continue to be implemented to ensure high standards are maintained</p> <p>This point will be referred to the authorised waste collectors – any issues reported to Dublin City Council will be acted upon and if witnessed they will be addressed.</p> <p>This is beyond the scope of the litter management plan as it is beyond the legislative provisions of the Litter Pollution Act.</p> <p>This is beyond the scope of the litter management plan as it is beyond the legislative provisions of the Litter Pollution act.</p> <p>Dublin City Council through its BETA programme is developing a resource for citizens to provide simple information on local waste arrangements. As part of the commitment in the plan to provide a communications plan this will include simple information on day-to-day management of waste.</p> <p>The issue of combatting illegal dumping through a variety of enforcement measures is dealt with in the draft under a number of areas</p>

	<p>including Enforcement / Illegal dumping and Management of Domestic Waste and associated objectives 27 / 28 / 30 / 31 /34.</p>
<p>Free provision of recycling bags.</p>	<p>This is not a matter that is under the remit of the City Council as kerbside recycling collection services are provided by private commercial authorised waste collectors. It is beyond the scope of the Litter Management Plan and the provisions of the Litter Pollution Act. the City Council supports recycling and provides a network of bottle and textile banks for free public recycling and several bring centres and civic amenity sites where mixed dry recyclables may be recycled free of charge.</p>
<p>Recycling Materials as a financial resource.</p>	<p>This is a waste management planning and circular economy issue. While the draft plan has regard to supporting and implementing recycling initiatives to address litter related issues it does not address these issues. It should be noted that Dublin City Council does receive rebates and payments for certain recyclable materials collected at its facilities.</p>
<p>All schools / community organisations to be given responsibility for green areas / spaces in their vicinity.</p>	<p>This cannot be dictated to community groups or schools rather it is a matter that Dublin City Council should support any group interested in taking responsibility for such areas. This is in place through programmes such as the City Neighbourhoods competition, Green Schools Programme and Picker Pals project and corporate social responsibility initiatives. All are supported by the City Council.</p>
<p>Offer jobs to homeless people in street cleaning and link in with services to help people progress.</p>	<p>Dublin City Council supports any initiative focused on communities or citizens seeking to engage in environmental improvements in their community and will work with any group seeking to advance this type of initiative in any sector.</p>
<p>Long term unemployed persons to be employed by DCC to assist in street cleaning.</p>	<p>This is not a matter for the Litter Management Plan. Dublin City Council engages in all relevant state</p>

<p>Naming and shaming of offenders.</p> <p>Regularly advertise a chart of the worst offending areas and the cleanest areas.</p> <p>Work with DCC Beta to come up with novel ideas to change culture</p>	<p>employment, training and development programmes that are applicable to it.</p> <p>It is not legally possible to publish to names of those subject to fixed penalty notices or prosecutions for littering offences.</p> <p>This is not considered constructive in effecting change. It will be considered how to highlight improvements in previously problematic areas and how these have been achieved in order to assist in the development of anti-litter initiatives.</p> <p>The draft plan notes ongoing cooperation with DCC BETA on projects to address waste and litter issues.</p>
<p>Recommendation: No amendment to Draft Litter Management Plan.</p>	
<p>Amendment: None.</p>	
<p>Name /Group: Phibsboro Village Tidy Towns</p> <p>Ref: LMPSTAT / 008</p>	

<p>Submission: Observations on waste reduction and the potential banning of soft plastics and single use plastics.</p> <p>Suggestion that a deposit scheme could be introduced for certain materials.</p> <p>Observation that private waste collection is not effective, suggestion that waste collection is taken back into local authority control and charged for through household rates.</p> <p>Observation that bye laws must be enforced regarding provision of segregated bins</p> <p>Suggestion that tougher bags or smaller bins be provided for smaller households without storage for bins.</p> <p>Suggestion that CCTV is more widely used for enforcement</p>	<p>Response: While the plan supports the issue of waste reduction to reduce litter and Dublin City Council targets on reduction and elimination of single use plastics the banning of materials is beyond the scope of the plan and its legislative provisions.</p> <p>This requires national implementation and is beyond the scope of the plan and legislative provisions</p> <p>This is beyond the scope of the plan and its legislative provisions.</p> <p>The enforcement of the waste bye-laws is one of the stated objectives of the plan.</p> <p>Dublin City Council is engaged in market consultation and the proposed amendment of bye-laws to progress this issue and is working with Dublin City BETA to examine issues relating to communal waste presentation and better waste services.</p> <p>It is a stated aim of the plan to continue to use CCTV where appropriate for the purposes of enforcement.</p>
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Recommendation: No amendment to plan.

Amendment: None.

Name /Group: Eoin McMahon

Ref: LMP/STAT 009

<p>Submission:</p> <p>Three core issues are addressed in the submission: Requirement to use bags rather than wheeled bins and resultant litter</p> <p>Lack of handcart cleaning outside of the core retail district</p> <p>Under resourcing of litter warden services</p>	<p>Response:</p> <p>Dublin City Council recognises that this is a serious issue and is engaged in market consultation and the proposed amendment of bye-laws to progress alternatives to plastic bags and is working with Dublin City BETA to examine issues relating to communal waste presentation and better waste services.</p> <p>This point is noted and it is a stated aim of the plan to continue to increase this type of cleaning where appropriate. Different forms of cleaning are required in different locations and the most appropriate forms of cleaning are implemented to address priority issues.</p> <p>The need to reorganise enforcement services was recognised in the previous litter management plan and it is stated within the review of the plan that this is underway to provide a more effective and efficient service.</p>
<p>Recommendation: Amend Plan at Pg 24.</p>	
<p>Amendment: amend heading to: Management of Domestic and Commercial Waste</p> <p>Insert Additional Bullet Point</p> <ul style="list-style-type: none"> • Dublin City Council will seek to trial and implement alternative solutions to waste presentation in plastic refuse bags 	

<p>Name /Group: Dublin Chamber</p> <p>Ref: LMP/STAT 010</p>	
<p>Submission:</p> <p>The submission makes the observation that the plan should show its alignment with the climate action and circular economy objectives of the City Council.</p> <p>The submission makes the observation that better information on service provision, range of services and frequency of activity could be communicated better to the business community</p> <p>The submission observes that an information campaign is required to promote the correct use of segregated bins once introduced</p>	<p>Response:</p> <p>The plan is formulated with regard to objectives and actions of the Dublin City Council Climate Action Plan and circular economy goals and there are shared objective such as actions on single use plastics and composting of organic street cleaning waste and the introduction of segregated recycling bins on street. The connection and interrelated nature of the plans may not be clearly stated and this will be rectified by amendment.</p> <p>This is a valuable suggestion that will be examined as part of the communications planning that is outlined in the plan.</p> <p>The introduction of segregated bins through the circle city project includes at its core a vibrant media and information campaign to promote the correct use of the segregated bins.</p>
<p>Recommendation: Amend Plan at Page 2 to make reference to the alignment of the plan with the Dublin City Climate Action Plan and the Eastern Midland Regional Waste Management Plan</p>	
<p>Amendment: The Litter Management Plan 2020 – 2022 is formulated having regard to the shared goals of the Dublin City Climate Action Plan, the Eastern Midland Regional Waste Management Plan and the UN Sustainable Development Goals. The plan contains actions and objectives that can contribute to positive climate outcomes, waste reduction and increases in recycling and reuse.</p>	

Name /Group: Mark Price Ref: LMP/STAT 011	
Submission: <p>The submission refers to the local authority resuming control of waste collection and</p> <p>The submission also notes the requirement for provision of alternatives to plastic bags for waste collection.</p>	Response: <p>This structure of the waste collection market and regime is beyond the scope of the plan and its legislative provisions.</p> <p>Dublin City Council recognises that this is a serious issue and is engaged in market consultation and the proposed amendment of bye-laws to progress alternatives to plastic bags and is also working with Dublin City BETA to examine issues relating to communal waste presentation and better waste services.</p>
Recommendation: Amend Plan at Pg 24.	
Amendment: amend heading to: Management of Domestic and Commercial Waste Insert Additional Bullet Point <ul style="list-style-type: none"> • Dublin City Council will seek to trial and implement alternative solutions to waste presentation in plastic refuse bags 	

Name /Group: Stephanie Dickinson	
Ref: LMP / STAT 012	
<p>Submission: The submission makes observations and suggestions under a number of headings. Bring Centres and Civic Amenity Recycling Facilities – increase the number of facilities and increase the waste accepted at these facilities.</p> <p>Provide occasional hazardous waste collections.</p> <p>Provide for segregation of waste at community clean up events.</p> <p>Provide educational workshops on Sustainable Living, Circular Economies, Disposal of Waste, and Composting</p> <p>Support for community environment initiatives</p> <p>Provide more densely planted planters to avoid potential for litter</p> <p>Promote Plogging in Dublin</p>	<p>Response: It is a stated aim of the plan to seek to increase the number of recycling facilities available in the city. It also noted that the City Council is seeking where possible to increase the recyclable material accepted at bring centres.</p> <p>The provision of hazardous waste collections has been supported and promoted by the City Council previously and this can be examined in the context of the provision of amnesty days as stated in objective 33 in the implementation plan.</p> <p>This will be examined in the operation of supporting community clean ups – contamination may be an obstacle to achieving this.</p> <p>This is an area that it is intended to promote through shared actions with the Dublin City Climate Action Plan based on the success of the climate action workshops. Objective 13 of the implementation plan refers.</p> <p>Dublin City Council supports these initiatives through the Local Authority Prevention Network and Community Environment Action Fund</p> <p>This suggestion will be referred to the parks and landscape services division.</p> <p>This suggestion will be raised with the sports and wellbeing partnership</p>
Recommendation: No amendment to plan.	
Amendment: None.	

<p>Name /Group: Cllr Mary Fitzpatrick</p> <p>Ref: LMP/STAT 013</p>	
<p>Submission: The submission suggests that the Dublin City Climate Action Plan and Eastern Midland Regional Waste Management Plan be referenced.</p> <p>The submission suggests that the plan should refer to the commitment from the elected members to remunicipalise domestic waste collection.</p> <p>The plan should set out an action plan for addressing litter in the North Inner City.</p> <p>Carry out a major compliance and enforcement campaign.</p> <p>Reintroduce a waiver for low income households.</p> <p>Programme for introduction of segregated street bins.</p> <p>Develop a plan to provide additional recycling facilities.</p> <p>Introduction of a deposit return scheme.</p> <p>Introduction of street sweeping and cleaning programme for urban villages.</p> <p>Introduce bye laws to facilitate alternate side of the street parking to allow for street cleaning.</p>	<p>Response: This is agreed and the plan will be amended to reflect this.</p> <p>The structure of the waste market and the provision of waste collection services is beyond the scope of the plan and its legislative provisions.</p> <p>The plan is a citywide plan for the prevention and minimisation of litter and does not concentrate on specific areas of the city. The plan does refer to the concentration of resources where most needed and specifically relating to areas considered to be litter blackspots or suffering from high levels of illegal dumping</p> <p>This is set out in the plan in respect of the enforcement of waste bye-laws.</p> <p>This is beyond the scope of the plan and its legislative provisions.</p> <p>This is set out as an objective of the plan and the project planning is underway.</p> <p>The plan clearly shares this aim and sets out that it will seek to consult with the public to achieve this and seek the provision of recycling facilities within the objectives of the Dublin City Development Plan.</p> <p>This is a national issue that is beyond the scope the plan and its legislative provision</p> <p>The provision of handcart sweeping services is set out as a stated aim of the plan.</p> <p>There is no provision in legislation to make bye-laws of this nature, the matter has been examined and is</p>

<p>Provide an annual review and report on the plan to the appropriate SPC and City Council</p>	<p>beyond the scope of the legislative provision of the plan. The plan does state the aim of increasing the provision of its service to communities wishing to arrange for clearing of parking to facilitate cleaning which has been successfully implemented.</p> <p>This is a requirement of the legislation providing for the plan and is clearly set out in the plan. The previous plan provided the same reports annually as was required by the legislation.</p>
<p>Recommendation: Amend Plan at Page 2 to make reference to the alignment of the plan with the Dublin City Climate Action Plan and the Eastern Midland Regional Waste Management Plan</p>	
<p>Amendment: The Litter Management Plan 2020 – 2022 is formulated having regard to the shared goals of the Dublin City Climate Action Plan, the Eastern Midland Regional Waste Management Plan and the UN Sustainable Development Goals. The plan contains actions and objectives that can contribute to positive climate outcomes, waste reduction and increases in recycling and reuse.</p>	

<p>Name /Group: South Georgian Core Residents Association</p> <p>Ref: LMP/STAT 014</p>	
<p>Submission: The submission observes that the issue of waste bags creating litter must be addressed.</p>	<p>Response: Dublin City Council recognises that this is a serious issue and is engaged in market consultation and the proposed amendment of bye-laws to progress alternatives to plastic bags and is also working with Dublin City BETA to examine issues relating to communal waste presentation and better waste services.</p>
<p>Lack of enforcement of Bye Laws and operating hours of Litter Wardens.</p>	<p>The need to reorganise enforcement services was recognised in the previous litter management plan and it is stated within the review of the plan that this is underway to provide a more effective and efficient service. The plan states that it is seeking to carry out more effective enforcement of the bye laws.</p>
<p>Graffiti on commercial premises.</p>	<p>Graffiti can be addressed through the existing provisions of the Litter Pollution Act as appropriate.</p>
<p>On street recycling facilities for glass and plastic should be provided.</p>	<p>It is a stated aim of the plan to introduce segregated bins for the most prevalent recyclables. Bottle banks are provided for glass recycling and it is stated in the plan that the City Council will seek to increase the numbers of these facilities.</p>
<p>Grant licences only to single operators for waste collection on city streets/areas.</p>	<p>This is beyond the scope of the legislative provision of the plan and refers to the collection permitting system and structure of the market.</p>
<p>Provide a citywide response to the seagull issue and insist bags are presented on railings where present to prevent seagull interference.</p>	<p>The success of implementing alternatives to presentation of waste in plastic bags would address these issues.</p>
<p>The issue of cigarette butts on the street to be addressed</p>	<p>Dublin City Council did carry out both enforcement action and awareness raising campaign in relation to cigarette litter during the previous plan; the issue will continue to be</p>

	addressed in this manner. Objective 24 refers.
Recommendation: Amend Plan at Pg 24.	
<p>Amendment: amend heading to: Management of Domestic and Commercial Waste</p> <p>Insert Additional Bullet Point</p> <ul style="list-style-type: none"> • Dublin City Council will seek to trial and implement alternative solutions to waste presentation in plastic refuse bags 	

Name /Group: Maura Hiney Ref: LMP/STAT 015	
Submission: Submission observes that a cleaning strategy is welcome but unsure how this will be implemented. Submission notes that support for community street cleaning requests and community clean ups should be available all year round. Submission suggests additional bins are required. Submission welcomes plans for additional enforcement	Response: The use of local knowledge, CRM data, street grading data and communication with local communities and representatives inform how cleaning schedules are implemented. This facility is available throughout the year. Dublin City Council work closely with local area offices and local representative groups when planning provision of infrastructure Dublin City Council has developed criteria for the provision of litter bins, which will be used to inform the placement of litter bins. The City Council is also currently in the process of putting in place contracts for the supply of new litter bins. No response required.
Recommendation: No amendment to plan.	
Amendment: None.	

<p>Name /Group: Proinsias Mac Fhlannchadha</p> <p>Ref: LMP/STAT 016</p>	
<p>Submission: Submission makes the following observations.</p> <p>DCC to consider expanding the materials which can be collected from bottle and textile banks to include cardboard given the prevalence of online shopping.</p> <p>DCC to consider having a bin at textile banks for clothes not suitable for reuse. Based on the findings of the EPA (attached), c10% of black rubbish includes "Textiles." A key reason for this may be to the fact that all textile bins are for charities and people may not feel comfortable donating unusable clothing to a charity and thus it ends up in a black bin</p> <p>DCC to commit that 100% of their units owned and leased for social housing will comply with DCC's own waste bye-laws for 3 stream bins (Black/ brown/ green)</p> <p>DCC to engage with the other 3 local authorities within Dublin so that any campaigns for dog poo, illegal dumping etc. are consistent and coherent which will not only generate maximum impact by way of reach but also minimise costs per campaign as one campaign could be rolled out across the 4 local authorities. All local authorities are experiencing the same problem and it needs to be tackled collectively in the Dublin area</p> <p>There is no mention of no. of</p>	<p>Response:</p> <p>Dublin City Council provides for recycling of mixed dry recyclables at bring centre and recycling centre locations throughout the city. Household kerbside collections are available throughout the city which includes the collection of mixed dry recyclables.</p> <p>This is a matter that is more relevant to waste management planning and policy and is considered in the context of recent public consultation on waste policy development.</p> <p>Dublin City Council is working towards ensuring that all housing complexes have access to 3 bin collections. In all other social housing units there is access to a 3 bin system and the tenant is responsible for compliance with the use of the system.</p> <p>Dublin City Council engages with the other Dublin local authorities in respect of awareness campaigns and initiatives and will continue to do so. Dublin City Council recognises the benefit of this approach.</p> <p>The same responsibilities apply to</p>

<p>business/ commercial/ civic buildings to be inspected in the enforcement metrics of this plan.</p> <p>According to the EPA, approx. (attached) 70% of the material in the black bin could be diverted to recycling or composting. Many businesses/ offices are not compliant with the Bye-Laws of DCC. Compliance with Bye-Laws (registered with a waste provider and multi stream bins need to be explored by DCC. This needs to be examined further</p> <p>There is no mention of no. of households to be inspected to confirm that they have 3 separate bins for waste streams (green/ black/ brown). This needs to be examined further.</p> <p>The Bye-laws need to be revisited as their intended purpose and financial penalties are not having the desired effect.</p> <p>Consider ensuring waste collectors advertise the recycling list to all customers.</p> <p>Ensure requirement for landlords to provide 3 bin systems within tenanted accommodation.</p> <p>Consider bye law to provide for a requirement for dog owners to be obliged to carry dog foul bags.</p>	<p>business as to domestic waste and the plan will be amended to reflect that commercial activities will also be investigated.</p> <p>The plan clearly sets out a compliance campaign will be undertaken in respect of the waste bye-laws. This campaign if successful will be expanded upon during the lifetime of the plan</p> <p>The compliance campaign outlined in the plan will initially target circa 3000 households and if successful will be expanded upon during the lifetime of the plan.</p> <p>The Waste bye-laws began implementation in 2019 as part of a nationwide consistent approach to the storage, presentation and segregation of household and commercial waste there are no current plans to revisit the bye laws excepting the current amendment proposed to facilitate alternative containers to plastic bags.</p> <p>Dublin City Council cannot oblige the waste collector to do this. The City Council will promote the recycling list and other shared beneficial messaging as is already the case through its various communications channels.</p> <p>This provision exists in the current waste bye-laws.</p> <p>There is no provision in legislation to make such a bye-law. This specific issue was considered in respect of primary legislation and is not considered a workable legislative provision.</p>
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<p>Create a central register of waste compliance information based on eircodes and updated by authorised waste collectors.</p>	<p>This suggestion refers in some respects to provisions within the Waste Management Act. As described it may go beyond these provisions and may not comply with Data Protection Legislation. Dublin City Council will investigate the possibility of the suggested project.</p>
<p>Create user accounts related to usage of civic amenity sites linked to eircodes to identify households disposing of waste at civic amenity sites.</p>	<p>Dublin City Council will investigate the possibility of the suggested project particularly in the context of data protection legislation.</p>
<p>Increase fixed penalty notice fine amount in waste bye laws.</p>	<p>This is not possible as the fixed penalty amount is defined by primary legislation.</p>
<p>Review international experience in on street recycling such as that carried out by Hubbub (Leeds by example).</p>	<p>Dublin City Council are working in partnership with Hubbub on the implementation of on street recycling bins.</p>
<p>DCC to contact all property management companies to address non compliance with waste bye laws in multi unit developments.</p>	<p>The plan sets out that Dublin City Council will implement a strategy to address waste management issues in multi occupancy buildings using a multi-agency approach. This suggestion will be considered in the context of this aim.</p>
<p>DCC to establish a live database of all multi unit buildings and associated management information with a requirement to submit annual updates.</p>	<p>See response above to suggestion regarding central compliance register and civic amenity site user accounts.</p>
<p>Make regulations via conditions of planning permission and Bye Law stipulating provision of 3 bin system for customers in food to go premises.</p>	<p>This suggestion will be examined in the context of reviewing existing litter prevention and control bye-laws and an amendment to the plan will be recommended to include a review of these bye-laws.</p>
<p>DCC to commit to publishing a street sweeping plan for leaf removal in autumn.</p>	<p>Mechanical street sweeping is ongoing daily throughout the main arterial routes and thoroughfares of the city. A leaf removal programme is implemented each autumn. A commitment is provided in the plan to provide an online facility to provide information on street sweeping schedules for the city.</p>
<p>DCC to commit to providing water refill stations throughout the city.</p>	<p>This is not a matter for the plan. It is worth noting that Dublin City Council</p>

<p>Issue of use of plastic bags for waste presentation</p>	<p>Climate Action Plan does include a target for provision of such facilities.</p> <p>Dublin City Council recognises that this is a serious issue and is engaged in market consultation and the proposed amendment of bye-laws to progress alternatives to plastic bags and is working with Dublin City BETA to examine issues relating to communal waste presentation and better waste services.</p>
<p>DCC to take control of waste collection in certain areas or operate a tender for waste collection services provision</p>	<p>This is beyond the scope of the legislative provision of the plan.</p>
<p>DCC to examine feasibility of underground bins</p>	<p>The feasibility of underground bins for the purposes of recycling has been examined by Dublin City Council</p>
<p>DCC to introduce standard colour coding for waste bins provided by private operators.</p>	<p>This is not considered a necessary intervention and would be cost increasing for customers of authorised waste collectors.</p>
<p>Consider introduction of reverse vending machines.</p>	<p>The trial of such technology is being considered as an element of the introduction of on street recycling.</p>
<p>Consider making it a mandatory requirement to implement deposit and refund scheme at licensed events.</p>	<p>Dublin City Council are currently working to implement a ban on all single use plastics at events supported or licensed by the council.</p>
<p>Ensure all non specialist waste vehicles are full electric or hybrid vehicles</p>	<p>This is not a matter for the plan. It is worth noting that Dublin City Council Climate Action Plan does include a target for provision of electric vehicles and the waste management division is seeking to introduce electric vehicles and equipment to replace diesel/petrol wherever possible.</p>
<p>Recommendation: Amendment to plan at pg 24 and pg 29</p>	

Amendment:

Pg 24.

amend heading to:

Management of Domestic and Commercial Waste

Insert Additional Bullet Point

Dublin City Council will seek to trial and implement alternative solutions to waste presentation in plastic refuse bags

Insert Additional Bullet Point

Dublin City Council will consider whether it is possible to create and maintain up to date records based on information such as eircodes on the domestic and commercial waste collections and civic amenity site use for the purposes of ensuring compliance with requirement to use authorised waste collectors.

Pg 29

Insert New Objective

Carry out review and update of Litter Prevention and Control Bye Laws

<p>Name /Group: Claire Moloney</p> <p>Ref: LMP/STAT 017</p>	
<p>Submission: Reinstall bins on Aughrim St, D7</p>	<p>Response: Dublin City Council work closely with local area offices and local representative groups when planning provision of infrastructure Dublin City Council has developed criteria for the provision of litter bins that will be used to inform the placement of litter bins. The City Council is also currently in the process of putting in place contracts for the supply of new litter bins. Consideration will be given to the submission of what is set out above.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

<p>Name /Group: Lisa Duggan Connolly</p> <p>Ref: LMP/STAT 018</p>	
<p>Submission: Appoint a Litter Sheriff for small districts within the area.</p> <p>Implement a bye law where Landlords can be fined for not keeping their properties and gardens in good order and ensuring wheelie bins are provided for their Tenants. These are commercial properties. Request shops to sweep outside their premises and wash down shop fronts on a daily basis. Encourage local schools to participate in programmes of school sweep up and blue bag litter collection.</p> <p>Name and shame people who dump litter.</p> <p>Distribute blue bags and litter pickers to Community groups .We always have to drive to Sean McDermott street to find them,often having to call more than once. Have a litter hotline number that is easy to remember and advertise it. Old age pensioners fill the bins with their little bags rather than pay. Could they avail of a free scheme.</p> <p>Install C.C.T.V.under railway bridges around the area and along the canals where dumping is a daily occurrence.</p>	<p>Response: Litter wardens are currently assigned to operate within specific areas.</p> <p>These suggestions are provided for in the Litter Pollution Act and Waste Bye Laws.</p> <p>These suggestions are provided for in the litter prevention and control Bye Laws.</p> <p>This is done through the picker pals programme that is outlined in the plan.</p> <p>This is not possible within current legislative provisions.</p> <p>This service is currently available</p> <p>All litter issues can be reported at 2222222 There is no such scheme available. Dublin City BETA projects may be able to consider this issue in the context of better waste management services as outlined in the plan</p> <p>The plan sets out that CCTV will continue to be used to try to address issues of illegal dumping.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

Name /Group: Bobby Behan Ref: LMP/STAT 019	
Submission: Submission makes a number of points on the following areas. Dumping blackspots in Ballyfermot area to be tackled. Restriction of access the laneway at Thomond Rd /Kylemore Rd to pedestrians and access only at restricted times. Cleaning at Upper Decies Rd. Comment regarding use of GPS in City Council vehicles. Comment regarding community cleanups	Response: The plan sets out stated aims and objectives in respect of tackling illegal dumping including the use of cctv and compliance campaigns. Both locations identified will be investigated. This is not a matter that can be dealt with in the context of a litter management plan. It will be referred for the attention of local area management within Dublin City Council. This local matter will be referred to the local Waste Management Inspector for attention. All Dublin City Council vehicles are fitted with GPS systems. Dublin City Council works with communities to facilitate all community clean ups in whatever way possible.
Recommendation: No amendment to plan.	
Amendment: None.	

<p>Name /Group: Paul Stafford</p> <p>Ref: LMP/STAT 020</p>	
<p>Submission:</p> <p>Submission suggests that Dublin City Council take control of all waste collection.</p> <p>Submission suggests increased provision of bins at parks and dog walking locations</p>	<p>Response:</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>The criteria for the placement of litter bins includes siting at entrances to parks and at areas of high footfall dog walking. Efforts have been made to ensure this is done and these will continue.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

Name /Group: Carmen Neary Ref: LMP/STAT 021	
Submission: The submission makes the following suggestions. Use audio messages to address dog fouling in Dartmouth Square Park. Regular clearing of watertraps is important during Autumn. Clearing of leaf fall need to be carried out more than once in autumn. Reintroduce the annual bulky waste collection service	Response: This issue will be raised with the Parks and Landscape Services Division. The plan makes reference to working with other internal departments on joint initiatives at objective 15. The Waste Management Division work in conjunction with the Drainage Division to target street cleaning and sweeping at areas at risk of flooding during leaf fall season. Removal of leaf fall material is ongoing throughout Autumn across the city. The annual service has been replaced by a low cost on demand service that provides an overall more flexible option for citizens. There are no plans to reintroduce the annual service which only serviced one third of the city annually.
Recommendation: No amendment to plan	
Amendment: None	

<p>Name /Group: Anonymous</p> <p>Ref: LMP/STAT 022</p>	
<p>Submission:</p> <p>Submission states as a Dublin City resident I think the management of waste should be taken back under the control of DCC.</p>	<p>Response:</p> <p>This is beyond the scope the legislative provisions of the plan.</p>
<p>Recommendation: No Amendment to plan</p>	
<p>Amendment: None</p>	

Name /Group: Dodder Action Ref: LMP/STAT 023	
<p>Submission: Submission suggests the following.</p> <p>DCC to lead out and support banning of single use plastics and implementation of a deposit and return scheme.</p> <p>Removal of clothing recycling bins from recycling areas.</p> <p>Relocation of recycling bins away from river Dodder at the Dropping Well and opposite Milltown Church.</p> <p>Provision of segregated solar bins throughout the river area.</p>	<p>Response:</p> <p>Dublin City Council supports the elimination of single use plastics and the plan outlines its aims in this regard that are also shared in the Dublin City Climate Action Plan. The City Council does not have the power to ban these items outright or to introduce a deposit and return scheme but is leading in introducing these measures within Dublin City Council.</p> <p>Dublin City Council recognises that textile recycling facilities require more stringent management to address dumping but do not recommend the removal of facilities.</p> <p>Dublin City Council will examine this suggestion locally.</p> <p>The feasibility of the provision of bins throughout the river area will be examined locally.</p>
Recommendation: No amendment to plan	
Amendment: None	

Name /Group: Geraldine Cusack Ref: LMP/STAT 024	
Submission: Submission makes suggestions relating to signage, litter wardens, location of bins and CCTV to address graffiti along the Grand Canal.	Response: The management of the canal is the responsibility of Waterways Ireland. Dublin City Council works closely with Waterways Ireland in respect of various issues and will refer these suggestions for further discussion. The plan sets out a stated aim and objective to work with stakeholders to improve litter issues on waterways.
Recommendation: No amendment to plan.	
Amendment: None.	

<p>Name /Group: Crumlin Community Clean -up</p> <p>Ref: LMP/STAT 025</p>	
<p>Submission: A wide ranging submission covering the entirety of the plan.</p> <p>Please include dates for next plan and reports on plan.</p> <p>Please provide appendix entry on public consultation.</p> <p>Make realtime data available to the public in one location under a litter management portal on the DC website.</p> <p>Include definition of plan, litter and responsibilities in relation to litter in the plan introduction.</p> <p>Include data on river and waterways clean ups and responsibilities.</p> <p>Include review of 2016 – 2018 plan as an appendix to the plan or be made available on the DCC website.</p> <p>Area of rationalisation of depots/human resources should not be include in review of plan.</p> <p>Not all areas of the litter management plan 2016 – 2018 are referred to in the review of the plan.</p>	<p>Response:</p> <p>The plan will be prepared in line with the legislative provisions and a report will be issued each year to the council as close as is possible to the full year following adoption of the plan. It is anticipated that the next plan will be presented in 2022 for adoption to provide for a new plan at the expiry of this plan should it be adopted. This will be provided.</p> <p>This is an excellent suggestion that will be considered in the context of the communications area of the plan and the plan will be amended accordingly.</p> <p>A brief paragraph will be added and the plan amended accordingly.</p> <p>The plan sets out the aim to engage with this issue and record data. This data will be provided in the reporting on the progress of the plan. This review will be made available as an appendix to the plan.</p> <p>As the Waste Management Division responsible for litter management within the city council underwent significant change during the lifetime of the previous plan it is considered relevant and important to provide information on developments such as these in the review of the plan.</p> <p>The plan clearly states that the highlights of the previous plan are shown for the purposes of the review section of the previous plan. A full review of the previous plan was undertaken and reported on and will</p>

<p>Can the council confirm if local community insight and knowledge will still be used to address litter issues and the designation of resources.</p> <p>Can the plan state how the City Council has worked on the recommendations of the IBAL report.</p> <p>Please provide a report on the implementation of the new Waste Bye Laws.</p> <p>No mention in review of WEEE Collection days.</p> <p>Review does not contain any cost analysis on effectiveness of measures taken.</p> <p>Provide online access to street grading results in addition to street</p>	<p>be included as an appendix to the plan.</p> <p>Dublin City Council works closely with communities through its liaison officers including the Litter Prevention Officer and Public Domain Officers and environmental liaison officers. This will be continued. Programmes such as the city neighbourhoods' awards facilitate such interaction.</p> <p>The City Council addresses directly any locations identified in the IBAL report by assessing cleaning needs and addressing any deficits identified that have contributed to a poor rating in the report. This level of detail is not provided in the plan in the interest of providing a concise strategy document setting out the aim, objective and ambitions of the City Council in dealing with litter management for the city as a whole.</p> <p>The plan clearly sets out that a large-scale enforcement campaign is being prepared for implementation. Annual reporting on the plan will provide updates in this regard.</p> <p>Updates on the progress of the previous plan clearly show that this objective was deemed no longer necessary due to the provision of WEEE collections directly through producer schemes. I.e. collection and removal when new products purchased or provision of WEEE recycling points at retail outlets.</p> <p>This is not a requirement of the plan. Cost benefit of litter and street cleaning expenditure is not straightforward due to the highly variable environmental factors required to be measured. The budgetary requirements of the service are based on the provision of the services and achieving the objectives of the service as set out in the litter management plan.</p> <p>This will be considered in the context of the development of the online street</p>
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<p>cleaning schedules.</p> <p>Provide online map of Dublin city bins.</p> <p>Carry out assessment of areas of need for additional litter bins.</p> <p>Develop a litter bin placement protocol.</p> <p>Provide data relating smart bins.</p> <p>Replant areas marked by bonfires at Halloween.</p> <p>Process should be in place for staff to feedback on issue of overflowing bins.</p> <p>CRM Data should be made available online.</p> <p>CRM should update customer on progress of an incident.</p> <p>Use of smart technology is not defined in the actions.</p> <p>Open Data not up to date and not user friendly.</p> <p>Interactive map should also include updates on completed schedules and effectiveness.</p> <p>Recommend new section – Human Resources.</p>	<p>cleaning schedule.</p> <p>This is available through data.smartdublin.ie</p> <p>This is done within the criteria for provision of public litter bins. It is Dublin City Council policy to provide litter bins in areas of need in proximity to litter generators.</p> <p>Criteria for provision of public litter bins in place.</p> <p>This is being examined in the context of the stated aim of providing open data as set out in the plan.</p> <p>This suggestion will be referred to the Parks and Landscape Services Division for their consideration.</p> <p>This is in place through local management structures.</p> <p>This will be examined in the context of the commitment in the plan to provide open data.</p> <p>Pursuing this improvement to CRM is set out as an aim of the plan.</p> <p>As an example the plan sets out to introduce QR code technology to bring bank locations and the continued roll out of solar compactor bins. As technology emerges and the city council engages with new technology how this can be applied to the waste area will be investigated and trialled.</p> <p>The datasets provided to the open data platform have been increased and now regularly provide detail on the tonnages of wastes collected and recycled.</p> <p>The interactive facility will provide as much information as possible within the confines of what is technically possible when designing and providing the facility.</p> <p>Updates on staffing levels will be provided annually for comparative purposes.</p>
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<p>Recommendation new section – Waste Collection.</p> <p>Information regarding the bulky waste collection should be provided and an analysis of whether low income areas use the service.</p> <p>Monitor bin collections to see if litter is being created.</p> <p>Organise an annual event to discuss litter management in Dublin City.</p> <p>Use leaflet drops to promote issues and initiatives.</p> <p>2</p> <p>Provide greater detail on Green schools.</p> <p>Provide details on the role and purpose of the litter prevention officer.</p> <p>Set out targets for the Picker Pals programme.</p> <p>Create an initiative to allow schools to visit DCC facilities to see litter issue at first hand.</p> <p>Explore the possibility of liaison with schools around a variety of anti-litter initiatives.</p> <p>Update and distribute Litter Education Pack.</p> <p>Compile community clean up information so that it does not skew reports.</p> <p>Provide training for community</p>	<p>This information is available from nwcpo.ie and can be made available on the dublincity.ie portal.</p> <p>Reporting on the bulky waste collection was carried out in each annual report for the previous plan and this can continue to be the case.</p> <p>This can be done as part of overall enforcement activity.</p> <p>This suggestion will be considered in the context of objective 13 of the implementation plan.</p> <p>This will be considered in the context of objective 12 of the implementation plan regarding the creation and implementation of a communications plan.</p> <p>This will be done through the annual reporting mechanism.</p> <p>The Litter Prevention Officer will provide an update to the annual report on the plan.</p> <p>This is dependent on capacity of the programme provider and other programmes may be implemented. Dublin City Council will seek to provide these programmes to as many schools as possible during the lifetime of the plan.</p> <p>This suggestion will be assessed in respect of how it can be facilitated in conjunction with ensuring health and safety is maintained.</p> <p>This will be added to the implementation plan objectives and the plan amended accordingly.</p> <p>This will be added to the implementation plan objectives and the plan amended accordingly.</p> <p>Community clean ups are dealt with separately to all other cleaning requests or complaints within the CRM system and can be reported on in a variety of different formats or reports as required.</p> <p>Workshops have been held for</p>
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<p>groups on environmental issues.</p> <p>Dublin City Council should work with all community groups to help devise local plans to deliver local objectives and assist in the development of tidy towns groups.</p> <p>DCC should try and promote plastic free initiatives.</p> <p>The Waste Management Division should trial a deposit and return scheme at local level.</p> <p>Dublin City Council should impose a levy on single use items.</p> <p>Introduce cleaning schedule for waterways.</p> <p>DCC should look at providing support and prizes for community and schools competitions.</p> <p>Community incentive green fund to be established.</p> <p>There is no mention of the adopt a street programme in the plan.</p>	<p>community groups on climate issues for example and DCC also cosponsored and facilitated travel for community groups to a tidy towns seminar in 2019. This is also considered to be within the remit of objective 13 of the implementation plan.</p> <p>Dublin City Council works with all groups to achieve local aims through its local area functions in conjunction with the Waste Management Services Division. This is clearly demonstrated in the success of the city neighbourhoods programme.</p> <p>Dublin City Council supports plastic free initiatives and has supported refill.ie and the conscious cup campaign among local interventions to remove single use plastics from its own facilities. The City Council is also targeting the elimination of single use plastics from any promotions or events that is supports or licences.</p> <p>Reverse vending machines will be trialled as part of the circle city segregated bins initiative.</p> <p>This suggestion goes beyond the powers of the local authority.</p> <p>As Dublin City Council do not have responsibility for the cleaning of all waterways this would be beyond the remit of the council. The suggestion can be considered in the context of collaboration with the other relevant stakeholders.</p> <p>This is already in place in the format of the City Neighbourhoods Competition.</p> <p>This is already in place through the Community Environment Action Fund that is cofunded by Government and the Local Authority.</p> <p>Dublin City Council works with local business and communities</p>
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<p>Please provide data on enforcement on DCC website.</p> <p>Please state the cost of CCTV and the number of fines and prosecutions .</p> <p>State how the Anti Litter Awareness Grant is used and how it may be applied for</p> <p>No information provided on door to door campaigns to be undertaken.</p> <p>Make available publically CRM mapping.</p> <p>Make Dog fouling statistics available online.</p> <p>Trial DNA id for dogs.</p> <p>Suggest new section – green space maintenance.</p> <p>Plan should detail targets, measurements, current values for all targets and actions.</p> <p>Annual reports should be available on the DCC website.</p>	<p>throughout the city to promote and progress environmental initiatives these can take the form of informal approaches or formal adopt a street projects.</p> <p>This will be included for consideration in the commitment to pursue dedicated litter data set out above. This information will be provided in the annual report on the progress of the plan as is set out in the implementation plan objective metrics.</p> <p>This will be provided annually in the progress report on the plan. Dublin City Council generally use this funding to carry out citywide awareness campaigns.</p> <p>The plan sets out the reporting to be provided on this type of campaign in the annual reporting.</p> <p>This will be considered and the suggestion referred to the IS department for assessment.</p> <p>This will be provided in the context of providing other litter data as referred to earlier in the submission and commitment given in responses.</p> <p>It is beyond the scope of the plan to introduce dog DNA testing. Any such scheme would require to be introduced nationally, be mandatory and have significant resources made available to provide for investigation and testing and would not address the issue of unlicensed dogs.</p> <p>This will be referred to the Parks and Landscape Services Division for their attention.</p> <p>Baseline metrics will be included wherever possible and the plan amended accordingly.</p> <p>All reports to the relevant strategic policy committee are available on the DCC website. This will be included in litter data.</p>
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<p>Suggested new section – promotion of the plan.</p>	<p>Various elements of this suggestion are already in place. The remainder will be considered. They are useful and easily implementable. A brief paragraph will be included and the plan amended accordingly.</p>
<p>Recommendation: Amend plan at pg1 and pg 30and also at implementation plan</p>	
<p>Amendment: Insert paragraph at pg 1 – Litter is defined Pg 30 Promotion of the plan will be undertaken Implementation plan include additional objectives</p> <ul style="list-style-type: none"> • Develop liaison with primary and secondary schools on litter education Including providing an updated and distribute Litter Education Packs to schools 	

<p>Name /Group: Joe O'Connor</p> <p>Ref: LMP/STAT 026</p>	
<p>Submission:</p> <p>Dog fouling is a problem and goes totally unpunished as there is no enforcement. Why not make it an offence to be in charge of a dog in a public place without a bag/poop scoop/...?</p>	<p>Response:</p> <p>There is no provision in legislation to make a bye-law in this regard. This specific issue was considered in respect of primary legislation and is not considered to be a workable legislative provision.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Proinsias Mac an Bheatha</p> <p>Ref: LMP/STAT 027</p>	
<p>Submission: Dog poo on footpaths is the biggest problem. The laws are there but not enforced. DNA testing would be a solution.</p> <p>Many people use a plastic bag for the dogs poo, and once they reach the dunes on the Bull Island, merely dump the bag on the ground. A barrel for the bags is at the entrance to the beach from the causeway/ Interpretive Centre. No such barrel exists at the entrance to the dunes just after the St Anne's golf club road. No such barrel exists at the dunes after the Royal Dublin golf club. This is where the poo bags are being dumped.</p>	<p>Response: It is beyond the scope of the plan to introduce dog DNA testing. Any such scheme would require to be introduced nationally, be mandatory and have significant resources made available to provide for investigation and testing and would not address the issue of unlicensed dogs.</p> <p>This suggestion will be referred to the parks and landscape services division for consideration.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

<p>Name /Group: Kelly McCarthy</p> <p>Ref: LMP/STAT 028</p>	
<p>Submission:</p> <p>Submission makes suggestion under a number of headings.</p> <p>Reduce waste at source by incentivising through rates reductions and name and shame business whose packaging ends up as litter.</p> <p>Enforce bye laws around provision of 3 bin system in apartments.</p> <p>Pilot / introduce communal bins for smaller dwellings.</p> <p>A publicly provided waste collection service be reintroduced as a means to curbing illegal dumping.</p> <p>Sign up to Terracycle programme and have DCC buildings as a collection /drop off centre</p> <p>Pilot deposit and return schemes</p> <p>Ensure plastic bags provided by waste collectors are sturdy enough to withstand birds.</p>	<p>Response:</p> <p>The variation of commercial rates is beyond the scope of the legislative provisions of the plan. How to engage and encourage responsible waste reduction through highlighting frequently occurring litter can be examined in the context of social media and communications messaging as set out in the aims and objectives of the plan.</p> <p>The priority of enforcement of the requirement to use an authorised waste collector or facility is specifically targeted in the plans aims and objectives. This is in the context of overall efforts to enforce all aspects of the waste bye-laws.</p> <p>It is a stated aim in the plan to work with Dublin City BETA to improve waste services. A project is already underway to trial communal household bins in the city.</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>This will be considered as an objective of the plan and the plan will be amended accordingly</p> <p>The introduction of on street segregated bins project will also include the piloting of reverse vending machines to trial their effectiveness.</p> <p>Dublin City Council is seeking to trial alternatives to presenting waste in plastic bags in the city through market</p>

<p>Consider radical measures to address dog fouling and convene a mini consultation on the issue.</p> <p>Provide sanctioned space for graffiti murals.</p> <p>Continue to run end consumer education campaigns.</p> <p>We would also ask that the council proactively monitor social media channels for reports for issues with bins and/or general litter issues.</p> <p>We would encourage the council to make greater use of CCTV warning signs and blurred images from CCTV to discourage littering.</p> <p>We would ask the council to allocate the amount of Litter Wardens to areas proportionate to the amount of illegal waste and dumping.</p> <p>Implement and publish a litter log, managed by the responsible DCC litter officer that lists the complaint received, Geocode of the litter location, date received, action / response taken, date of action.</p> <p>Publish a schedule on the Dublin City Council website that showed whether streets were cleaned daily, weekly or monthly.</p> <p>Reform our parking regulations working with the Department of Transport so that we can restrict</p>	<p>consultation and amending its waste bye-laws to regulate for the use of suitable alternatives.</p> <p>Dublin City Council will carry out a mini non statutory consultation on a number of specific litter issues including dog fouling as suggested this can be done in the context of objective 13 in the implementation plan.</p> <p>Dublin City Council Arts Office and Planning Dept are engaged in this topic and a number of such spaces have already been trialled in the city.</p> <p>It is a stated aim of the plan to continue to carry out awareness and education campaigns. Dublin City Council have recently run a dog fouling awareness media campaign. This is already in place through official Dublin City Council social media channels such as @dubcitycouncil and @dubcityenviro</p> <p>The plan states that CCTV will be used for enforcement purposes where appropriate. This will be used to the fullest extent possible within the constraints of applicable legislation such as GDPR.</p> <p>The plan states in its aims that resources will be allocated to areas where issues such as illegal dumping are most prevalent.</p> <p>Dublin City Council will consider this in the context of the commitment given to providing open data as set out in the plan.</p> <p>The plan states that a resource such as an interactive map showing cleaning schedules for the city will be made available to the public through the dublincity.ie website. The feasibility of being able to introduce such as scheme when residential parking permit schemes</p>
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Name /Group: Ronan Ref: LMP/STAT 029	
Submission: Submission suggests the introduction of segregated bins in the city. Submission suggests composting of leaves collected by DCC. Submission suggests examining model of recycling centres in Luxembourg	Response: It is a stated aim of the plan to introduce segregated bins to the city and this project is progressing to launch. Dublin City Council has introduced the composting of leaves collected by street cleaning and this is detailed within the plan. This model will be examined by Dublin City Council in recycling services to examine any additional services provided above what is available at Dublin City Civic Amenity Centres.
Recommendation: No amendment to plan	
Amendment: None	

Name /Group: Susan Pike Ref: LMP/STAT 030	
Submission: <p>Please ban the selling of coffee cups and plastic bottles across the city to reduce waste and litter.</p> <p>Also dog dirt is appalling across the city. Particularly in Drumcondra. Dangerous around schools. Please enforce the rules.</p>	Response: <p>It is beyond the scope of the plan or the powers of the local authority to implement a ban as suggested. The plan outlines the approach of Dublin City Council to address single use items.</p> <p>It is the aim of Dublin City Council to enforce the provisions of the Litter Pollution Act wherever possible to do so.</p>
Recommendation: No amendment to plan	
Amendment: None	

<p>Name /Group: Colm Moore</p> <p>Ref: LMP/STAT 031</p>	
<p>Submission: A wide ranging submission on the plan</p> <p>Provide a 24-hour hotline for reporting of exceptional cases.</p> <p>Use commercial satellite imagery for dumping of waste.</p> <p>Data on facilities should be shared through open data.</p> <p>Can data such as QR codes be used to better identify locations for locating bins.</p> <p>Can solar compactor bins automatically report when full.</p> <p>Provide more community recycling facilities.</p> <p>Are open topped bins still in use.</p> <p>There is a requirement to plan for cleaning around traffic islands.</p> <p>Are surface sealed after cleaning.</p> <p>Put in place a scheme to assist property owners with graffiti.</p>	<p>Response:</p> <p>Dublin City Council provide a 24-hour emergency number for such incidents.</p> <p>Aerial photography is in use for waste enforcement purposes nationally. This is not required for litter management. The plan sets out the aim to provide as much data as possible through open data in line with national government approach.</p> <p>All available data including mapping and CRM data can be used in this regard.</p> <p>This is a key part of the technology of smart bins.</p> <p>The plan sets out to try to identify additional locations and provide for similar in the development plan. Dublin City Council cannot mandate private commercial operations to provide community recycling facilities. It should be noted that many do provide these facilities.</p> <p>Only in the case of bins provided for additional capacity on a temporary basis such as at events.</p> <p>This is in place and managed locally by operational teams.</p> <p>Newly constructed areas of public realm may be sealed to protect surfaces.</p> <p>Dublin City Council will advise and assist in dealing with issues relating to graffiti. Dublin Town also provide a service to their members in the central</p>

<p>Cooperate with drainage department to prevent blocked gullies in leaf fall season.</p> <p>It may be useful to consider the use of booms to collect litter in waterways.</p> <p>Shift burden of waste onto original producers.</p> <p>Provide water refill stations.</p> <p>Deposit schemes should be introduced for most polluting waste streams.</p> <p>Provide better information on what goes in each bin.</p> <p>Food service locations should be required to present waste in bins not bags.</p> <p>Encourage a single wholesale market in waste collection.</p> <p>Permanent hazardous waste collection programme should be put in place.</p> <p>Implement measures to reduce accidents relating to waste collection.</p> <p>Do not collect waste at peak time usage i.e. in city centre at rush hour.</p>	<p>commercial district.</p> <p>This is in place. The Waste Management Division carry out cleaning of at risk locations in cooperation with the Drainage Division.</p> <p>Dublin City Council are currently examining proposals such as this suggests.</p> <p>This is already in place through packaging and waste regulations and associated producer responsibility schemes. It is beyond the scope of the legislative provisions of the plan.</p> <p>This is provided for the Dublin City Council Climate Action Plan.</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>This has been carried out with the development of the recycling list and the mywaste.ie portal. Bins cannot be used in all locations. Dublin City Council is investigating potential alternatives to the use of bags to present waste.</p> <p>This is beyond the scope of bye-laws and the legislative provisions of the plan.</p> <p>Bring Centres and Civic Amenity sites provide for the disposal of a range of hazardous wastes.</p> <p>Dublin City Council operates stringent health and safety protocols in line with legislative requirements and best practice in all operations. The matter of the safety of waste collection is not dealt with in the litter management plan.</p> <p>Waste collections avoid rush hour and are carried out largely at evening/night in the city centre. Public bins in the core city centre are serviced largely by electric hand driven carts that do not travel on carriageways.</p>
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<p>Enforce proper presentation of waste.</p> <p>Identify and divert graffiti taggers.</p> <p>Identify and divert those collecting bonfire materials and organise community bonfires.</p> <p>Spell Checking, consistency of phrasing and formatting of plan.</p>	<p>It is the aim of Dublin City Council to fully enforce all aspects of bye-laws relating to the storage, segregation and presentation of waste. Dublin City Council is engaged in consultation with street artists.</p> <p>Dublin City Council provide a large range of diversionary events in the lead up to Halloween. Dublin City Council do not consider community bonfires to be appropriate in the context of various concerns including burning of material and the environmental effects of this activity. This has been fully considered and addressed where appropriate in the final plan.</p>
<p>Recommendation: Amend plan throughout to address any formatting on syntax errors</p>	
<p>Amendment: Various amendments to formatting and syntax to ensure consistency throughout the plan</p>	
<p>Name /Group: Paschal Nee</p> <p>Ref: LMP/STAT 032</p>	

Submission: Duplicate submission of LMP/STAT 028	Response: As LMP/STAT 028 above.
Recommendation: As LMP/STAT 028 above.	
Amendment: As LMP/STAT 028 above.	
Name /Group: Conor Fennessey Ref: LMP/STAT 033	

<p>Submission:</p> <p>Submission states that the collection of domestic and commercial waste system needs reform. The fact that some people seem to think they can bring their domestic waste and leave it at a litter bin is unfathomable. Surely there is a better way, look at cities like Barcelona where waste is deposited in big bins and segregated in an orderly fashion.</p> <p>Street sweeping is hit and miss, why is there not a regular programme, especially on secondary streets, there should be times when there is no parking allowed on streets regularly so streets get swept properly. Often I see sweepers going up and down Camden Street, but the footpaths are filthy dirty, no effort is made to pick up that litter, it then blows onto the street after the sweeper has passed by.</p> <p>Dog fouling is a huge problem. On my street there is St Kevin's Park, many people walk their dogs there and in the process their dogs foul both the park and the surrounding footpaths - I don't see any dog fouling bins in the area. People need to be prosecuted for dog fouling and litter in general.</p>	<p>Response:</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>Street sweeping schedules are in place and a street grading programme is in place to assess and address the quality of service provision. Local issues identified will be brought to the attention of local management.</p> <p>The plan states that a clear message will be developed to inform that any bin can be used for dog fouling and that targeted enforcement campaigns will be carried out in relation to dog fouling offences.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	
<p>Name /Group: Lorraine Mitchell</p> <p>Ref: LMP/STAT 034</p>	

<p>Submission:</p> <p>Drimnagh has a row of businesses on A. Errigal road B. Galtymore road C. Benbulbin road D. Keeper road The paths at these locations need be cleaned/power washed on an ongoing basis.</p> <p>Bins on Benbulbin/Sperrin road are needed as these are roads off Luas stops.</p> <p>Dog bins around Drimnagh esp side of canal.</p> <p>Residents to be made aware of street sweeping days so that cars are prevented from parking to allow for thorough cleaning of streets.</p> <p>More public bins in area esp at busy bus stops.</p>	<p>Response:</p> <p>This will be brought to the attention of local operations management. Neighbourhood shopping locations are prioritised for cleaning and servicing of litter bins.</p> <p>Requests for additional bins will be examined in line with the criteria applied to the provision of public litter bins.</p> <p>A street cleaning schedule will be made available online as is set out in the plan and Dublin City Council provide a service in cooperation with residents to provide street sweeping at prearranged times when vehicles have been removed. As above comment re provision of additional bins.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	
<p>Name /Group: Anonymous Submission</p> <p>Ref: LMP/STAT 035</p>	

<p>Submission:</p> <p>DCC need to increase the number of litter wardens, have them working shifts as most dumping occurs at night, and be PRO-ACTIVE in identifying and prosecuting the people who are dumping rubbish. Costs can be covered by issuing and collecting fines. The current bye laws allow for fines up to €2500.</p>	<p>Response:</p> <p>Dublin City Council is in the process of reorganising its enforcement services to provide for more effective litter enforcement. Enforcement services are not cost neutral and fines over €75 can only be imposed and collected by the courts following successful prosecution</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	
<p>Name /Group: Niall Loftus</p> <p>Ref: LMP/STAT 036</p>	

<p>Submission:</p> <p>The draft plan makes references to litter bins on streets and in public parks, but there is no reference to public paths including those along the river Dodder.</p> <p>These public walkways should be specifically covered in the new plan, including the provision of litter bins, added to the cleaning schedule and checking for illegal dumping.</p>	<p>Response:</p> <p>Dublin City Council will consider the issue of provision of litter bins in proximity to waterways. The plan will be amended accordingly.</p>
<p>Recommendation: Amend plan at pg 22</p>	
<p>Amendment: Insert sentence under heading Blue Spaces</p> <p>Dublin City Council will consider the issue of provision of litter bins in proximity to waterways.</p>	
<p>Name /Group: Tim O’Sullivan</p> <p>Ref: LMP/STAT 037</p>	

<p>Submission:</p> <p>I consider the present strategy of charging for waste disposal is fundamentally mistaken. The fact is that waste charges actually incentivise many people to dispose of waste illegally. This is regrettable behaviour but simply an observable fact. While working with the Raheny Tidy Village Group I often see bags of domestic rubbish deposited on the street beside litter bins or on grass areas.</p> <p>I think that waste charges should be rolled in with the household charge so that there is no incentive to dump illegally.</p> <p>The present system is based on a polluter pays model but this can only work if there is higher level of enforcement than can actually be provided.</p> <p>In addition I think consideration should be given to large communal bins such as can be seen across Spain and Greece.</p>	<p>Response:</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>This issue is being examined in conjunction with Dublin City BETA examining how to deliver better waste services.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	
<p>Name /Group: Orna McMonagle</p> <p>Ref: LMP/STAT 038</p>	

<p>Submission:</p> <p>Upgrade and Upsize the current bins in the area parks - the ones at Bushy Park , Palmerston Park along the Dodder are not fit for purpose , they are too small for the pedestrian traffic through these areas - they get filled far too quickly with coffee cups and picnic waste</p> <p>There should be development of separate bins for Dog Faeces disposal for the welfare of City Council Staff and sufficient signage of fines / Campaign - inner city streets are quite spoiled in areas</p> <p>Roving hidden CCTV cameras for problem areas - maybe a part time litter officer for the parks to manage this. - overflowing glass recycling in the public car park at Milltown</p> <p>Plastic bin bag collections in the city centre are a disaster with the growing seagull and pigeon population that has got out of control and now at dangerous levels.</p> <p>Is there an audit programme taken on condition of bins and city centre streets - spot checks</p>	<p>Response:</p> <p>This suggestion will be referred to the parks and landscape services division for their consideration. Solar compactor bins have been installed in a number of parks providing additional capacity.</p> <p>Dog fouling specific bins are in use in the city where standard bins are not recommended. The city council do promote the fact that any bin can be used for dog waste and standard litter bins cater for all litter and therefore provide a better overall service.</p> <p>Mobile CCTV is in use for the purpose of identifying offences and the plan states that this use will continue.</p> <p>Dublin City Council recognises that this is a serious issue and is engaged in market consultation and the proposed amendment of bye-laws to progress alternatives to plastic bags and is working with Dublin City BETA to examine issues relating to communal waste presentation and better waste services.</p> <p>The Street Grading programme introduced by Dublin City Council is designed to provide ongoing audits of street cleaning and includes the condition of public litter bins in its assessment.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

<p>Name /Group: Vinnie Hall</p> <p>Ref: LMP/STAT 039</p>	
<p>Submission:</p> <p>That litter receptacles of any type be situated and positioned in such a manner as to facilitate rather than prevent or obstruct the mobility of impaired persons. This should include blind, mobility impaired and others. This means taking into account other adjacent street furniture, licensed and unlicensed. Further, that those receptacles currently poorly positioned be moved.</p> <p>That all litter receptacles, recycling facilities, and any other associated devices in the proposed plan, be made fully accessible . Further, that those currently not accessible be made so.</p> <p>The need of citizens disabled by Dublin City Council's poor current execution of service provision overrides the preservation of entire sections of the built environment where an already sufficient example exists, and where a minor adjustment to allow safe mobility would enable.</p>	<p>Response:</p> <p>Dublin City Council does situate litter receptacles with the aim of ensuring that mobility is maintained for all citizens. Any poorly located receptacles will be relocated.</p> <p>Dublin City Council will carry out an accessibility audit on its waste and recycling infrastructure to identify and address issues.</p>
<p>Recommendation: Amend plan at pg 23</p>	
<p>Amendment: Insert new Header and sentence</p> <p>Accessibility</p> <p>Dublin City Council will carry out an accessibility audit on its litter, waste and recycling infrastructure to identify and address issues.</p>	

<p>Name /Group: Ailbhe Horgan</p> <p>Ref: LMP/STAT 040</p>	
<p>Submission: Time to have municipalities responsible for waste management services! Current status quo of a free for all where private operators go uncoordinated is chaotic, inefficient and expensive!! Illegal dumping and rubbish everywhere! Time to have DCC manage this service, like any other major european city.</p>	<p>Response: This is beyond the scope of the legislative provisions of the plan</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Sharon Weldon</p> <p>Ref: LMP/STAT 041</p>	
<p>Submission: Provide dog poo bins in Phoenix park.</p>	<p>Response: The Phoenix park is not within the remit of Dublin City Council. The suggestion will be referred to the OPW for consideration.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

Name /Group: **Jillian Doyle**Ref: **LMP/STAT 042****Submission:**

I would like to request an increase in provision of better bins (i.e. solar belly bins) in the Lower Drumcondra/ Binns Bridge area

I would also request an increase in street cleaning services

On a more global level I would value a longer term plan whereby litter collection was made available to all citizens of Dublin for free but that we paid a local tax to cover the cost of the service. In this way all citizens would automatically pay for waste collection and people would not be trying to evade paying for bins.

Response:

These are local issues that will be considered in the context of operational planning and service provision.

This is beyond the scope of the legislative provisions of the plan.

Recommendation: **No amendment to plan.**

Amendment: **None.**

<p>Name /Group: John Denby</p> <p>Ref: LMP/STAT 043</p>	
<p>Submission:</p> <p>Submission complains about servicing of bins in Stoneybatter and the condition of croppies acre park.</p>	<p>Response:</p> <p>These are local issues that will be considered by local operations managers. Issues in Parks will be referred to the Parks and Landscape Services Division for consideration.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Sean Lynch</p> <p>Ref: LMP/STAT 044</p>	
<p>Submission:</p> <p>DCC to partner with Open Litter Map</p>	<p>Response:</p> <p>Dublin City Council will contact submitter to explore the potential of the suggestion.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Miriam Fitzgerald</p> <p>Ref: LMP/STAT 045</p>	
<p>Submission:</p> <p>The issue of dog fouling on the streets of Dublin 7 needs to be addressed. Faussagh ave, Rathoath rd, Nephin rd are an example of how bad the situation is . There needs to be a monitoring of the streets and harsher penalties for people who do not clean up after their dogs. It's at critical and dangerous levels.</p>	<p>Response:</p> <p>The issue of dog fouling and how Dublin City Council aims to address the issue is clearly set out in the plan.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

Name /Group: Harry Havelin Ref: LMP/STAT 046	
<p>Submission: I am of the view that all bin collection services should be returned to DCC control.</p> <p>Street/road cleaning/pavement cleaning needs to be greatly improved. Parked cars prevent proper gutter cleaning. New regulations should be brought in to require streets/roads to be clear of cars on cleaning days.</p> <p>Cycle paths have been laid in various parts of the city, but then they are never cleaned - resulting in accumulation of dirt, and broken glass.</p>	<p>Response: This is beyond the legislative provisions of the plan.</p> <p>The feasibility of being able to introduce such as scheme when residential parking permit schemes can be oversubscribed and no alternative parking provision can be allocated for those with permits is considered to be difficult. The matter will be referred to the parking enforcement section for their views on whether such a scheme could be successful and how it could be progressed. Dublin City Council does provide for an on demand service to be provided in conjunction with residents as stated in the plan and aims to increase the provision of this service.</p> <p>Dublin City Council is currently examining how segregated cycle ways may be cleaned more effectively given the difficulty in accessing some of these street cleaning vehicles.</p>
Recommendation: No amendment to plan	
Amendment: None.	

<p>Name /Group: JP O’Keeffe</p> <p>Ref: LMP/STAT 047</p>	
<p>Submission:</p> <p>Take it back under council control Direct labour put a charge on every household so everyone pays and generates revenue for the council to put resources into it . Stops people dumping leaving bags on streets</p>	<p>Response:</p> <p>This is beyond the scope of the legislative provisions of the plan.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

Name /Group: Melissa Ref: LMP/STAT 048	
Submission: I am based in Phibsborough and most days there is illegal rubbish dumped at the bus stop and beside the bin. I have sent complaints. It takes the look off my shop and makes the area and local businesses look filthy. We pay enough in rates not to be dealing with this.	Response: The plan clearly states the aims and objectives of Dublin City Council to tackle the issue of illegal dumping.
Recommendation: No amendment to plan	
Amendment: None	

<p>Name /Group: Micheál Kelliher</p> <p>Ref: LMP/STAT 049</p>	
<p>Submission:</p> <p>Privatisation of waste service is clearly not working. Illegal dumping is increasing, and it's damaging the city. I believe that bringing the bin services back in the public ownership is the only way forward.</p> <p>I believe that the waste service should be funded directly by progressive taxes, like income taxes. I don't agree with the property taxes, because they are taxes on debt, not on wealth. But the property taxes can be used to cover the bin services.</p> <p>Communal bins would be a good idea for some streets, with lack of spaces for individual wheelie bins. For communal bins, they should be collected more regular, a couple of times per week, rather than weekly.</p> <p>We need a lot more public bins on footpaths. It doesn't make any sense removing public bins from streets when we need more!</p>	<p>Response:</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>This issue is being progressed as a trial project in conjunction with Dublin City BETA</p> <p>There are commitments in the plan to maintain and upgrade the stock of litter bins and to provide additional bins where they are required</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

Name /Group: Aidan Regan Ref: LMP/STAT 050	
<p>Submission: I am a resident of Cabra East, Dublin 7.</p> <p>The issue of dog fouling occurs on all streets around Christ the King church. More interventions from the City Council to raise awareness about this problem would be most welcome, in addition to much heavier penalties on those who allow their dog to do it.</p> <p>Maybe consider a leaflet drop into houses?</p> <p>The issue of littering is particularly bad along Imaal road, and adjoining roads to the 17 shops. This is particularly a problem when it comes to people dropping their take away boxes from the local take aways. The problem rests with those who do this, but more interventions from the Council to raise awareness would be most welcome.</p> <p>The issue of illegal dumping is really bad in the lane adjoining Charleville road and Annamoe Drive. It looks worse than the worse inner city streets of 1970's Napoli. I have requested before that cameras are inserted, and that the lanes are reclaimed by street artists, or anything to try make them a public-streetscape, rather than a dumping ground.</p> <p>Maybe reach out to TUD, and request they get involved?</p>	<p>Response:</p> <p>The plan clearly states the actions that Dublin City Council aims to take to address the issue of dog fouling. The City Council have recently carried out an awareness campaign on this issue.</p> <p>The plan sets out the City Councils aims and objectives to carry out education and awareness raising measures and to improve its communications. It also sets out how it intends to continue to improve on how it works with communities to address litter related issues.</p> <p>The plan sets out the City Councils aims and objectives to carry enforcement and continue to use CCTV for this purpose. The specific issues raised will be considered locally.</p>
Recommendation: No amendment to plan	

Amendment: None	
Name /Group: Janine Brennan Ref: LMP/STAT 051	
Submission: <p>The government need to take back management of waste to stop illegal dumping.</p> <p>Also a trial of underground waste bins would be a fantastic opportunity to curb the litter pandemic in the north inner city</p> <p>There needs to be harsher laws to prosecute people who dump rubbish illegally.</p>	Response: <p>This is beyond the scope of the legislative provisions of the plan</p> <p>The feasibility of underground bins for the purposes of recycling has been examined by Dublin City Council. The City Council will contact the local authorities in the UK noted in the submission to seek their experience to date with underground bin projects.</p> <p>This is beyond the scope of the legislative provisions of the plan. Dublin City Council does advocate for changes to primary legislation to address litter and illegal dumping.</p>
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Peggie Moore Ref: LMP/STAT 052	
Submission: The dumping around Dublin City centre and adjacent areas has grown significantly in the past 3 months. I have seen people drive up in cars and dump bags on side streets that are loved by their neighbours. It is shocking what the Dublin City street cleaners have to clean on a daily basis. At Amien Street one house dumps all the rubbish outside on a daily basis and it is pulled around the street by seagulls, this is encouraging rats and creating further issues. People need to be fined, the same people do not dump in their own areas! Cannot wait to see what your future plans are, our beautiful city is being destroyed.	Response: The plan clearly sets out the aims and objectives of Dublin City Council to address litter and illegal dumping issues.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Peter McCarthy Ref: LMP/STAT 053	
Submission: I propose examining ways to ridicule and humiliate offenders. It may not be possible to ridicule the individual offender but there might be a way of doing something that is as effective. For example: A photoshopped real life - stock photo of an individual who was caught with the words "This is Joan, she was caught throwing her rubbish in a laneway - this could be you next"	Response: The merits of the suggestion in the submission can be examined in the context of the development of awareness raising programmes that are set out in the plan.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Jennifer Walsh Ref: LMP/STAT 054	
Submission: I would like the DCC to take back the management of waste in eastwall as the litter situation is really bad. I would like the yearly collection by DCC of large household item to resume again which would stop littering of those items.	Response: This is beyond the scope of the legislative provisions of the plan. This service has been replaced by a low cost on demand service that provides an overall more flexible option for citizens. There are no plans to reintroduce the annual service which only serviced one third of the city annually.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Gearoidin Aine Ni Ciosog Ref: LMP/STAT 055	
Submission: Submission makes observations on litter and associated issue sin Dartmouth Square and along the grand canal	Response: The issues relating to the day-to-day management of Dartmouth Square will be referred to the Parks and Landscape Services Division for their consideration. The issues relating to the grand canal will be considered in the context of the stated aims and objectives of the plan where it refers to blue spaces and waterways.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Geraldine Griffin Ref: LMP/STAT 056	
Submission: Hi, our local park Ranelagh Gardens has only one bin, it is more often than not overflowing and as a result people just leave their rubbish beside it and it blows around the park and attracts vermin. Please could you consider adding two more large bins to the park?	Response: The suggestions relating to Ranelagh Gardens will be referred to the Parks and Landscape Services Division for their consideration.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Sile McVeigh Ref: LMP/STAT 057	
Submission: Please increase numbers of bins in parks and in large parks (eg Herbert park) zones where dogs are completely forbidden as well as dog friendly zones with longer off-lead hours. It would benefit both dog owners and those who don't want to be around dogs. In London lots of parks are zoned like this and it worked very well for everyone - people with toddlers don't have to worry about stray dog poo and dogs aren't overcrowded And causing a nuisance as they sometimes do here because they all turn up for the same off lead hour.	Response: The suggestions made will be referred to the Parks and Landscape Services Division for their consideration. It is worth noting that additional high capacity solar compactor bins have recently been installed in a number of Dublin City parks.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Shane O'Duibhleacain	
Ref: LMP/STAT 058	
<p>Submission: McDonalds have removed litter bins outside eastward store they should replace public bins outside the shopping areas are required in the east wall north strand areas. CCTV to monitor problem litter black spots in conjunction with litter warden patrols.</p> <p>Ossory road Irish Rail lands access should be closed and fly tipping controlled.</p> <p>The recycle centres on Alfie Byrne road and east road should be monitored.</p> <p>Dog fouling rules need to be enforced great work so far.</p> <p>More public anti litter campaign throughout the city public litter bins are a necessity combined with a take it home.</p> <p>The use of remotely piloted aerial vehicles to monitor areas. It's our city keep it pretty.</p>	<p>Response: This local issue will be addressed through the Litter Management Office.</p> <p>CCTV is in use and the plan sets out the aims to continue using CCTV for enforcement.</p> <p>This local issue will be referred to Dublin City Council area management for consideration.</p> <p>Both locations have benefitted from CCTV monitoring and this will be continued.</p> <p>The plan sets out how Dublin City Council aim to address the issue of dog fouling.</p> <p>The plan states that Dublin City Council will continue to carry out litter awareness campaigns.</p> <p>The use of drones has not been considered in the plan due to GDPR concerns.</p>
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Sabatina Andreucetti	
Ref: LMP/STAT 059	
Submission: With increased high rises, traffic & businesses in East Wall area it is increasingly noticable that litter bins are inadequate. Plus communal bins. As dumping is also increasing.	Response: The plan clearly sets out that Dublin City Council aims to maintain and improve the stock of litter bins in the city and provide additional capacity bins where required. Dublin City Council is progressing a project to trial communal bins in the city through the Dublin City BETA process.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Greg Timony Ref: LMP/STAT 060	
Submission: Litter is atrocious at the weekends (scattered all over the complex) because people from outside are using the complex as a rubbish dump, overflowing the bins. We need more collective rubbish Bins in Poplar Row for the other complexes. Additionally there is a problem with litter in and around Fairview Park , especially around the Council sports grounds where there illegal dumping in the wooded areas making them eyesores . The Long term solution would be to reverse the Bin collection privatisation, but in the mean time better policing is needed to try to reduce casual and illegal dumping.	Response: The suggestion is beyond the scope of the legislative provision of the plan. Dublin City Council is in the process of reorganising its enforcement services to provide a more effective response to enforcement issues.
Recommendation: No amendment to plan.	

Amendment: None.	
Name /Group: Caitriona Ni Cassaithe	
Ref: LMP/STAT 061	
<p>Submission: DCC need to increase staffing levels to ensure the waste management system runs efficiently and effectively.</p> <p>Bins in the East Wall area are regularly overflowing and should be emptied more regularly as the litter is all over the streets.</p> <p>A city-wide campaign needs to be launched to explain the QR code system to people (including involving children and young adults). Compartments for safe disposal of cigarette butts should be regularly checked. Many in the East Wall area are broken/absent.</p> <p>Regular weeding of streets in the East Wall area.</p> <p>Dog fouling is still an issue in parts of the city despite media campaigns and extra bins. DCC should have regular litter warden patrols to give on the spot fines to those responsible. Again, this requires additional staff.</p> <p>“All bottle and textile bank locations are now included in Area Based cleaning schedules and receive scheduled daily cleaning and deep cleaning on an annual basis” This is not happening at the East Road Bottle and Textile Bank.</p> <p>The plinth for the Luke Kelly statue at Commons Street should be raised to</p>	<p>Response: Dublin City Council has consistently ensured that staffing levels are maintained to deliver a full range of within Waste Management Services.</p> <p>This issue will be referred to the local operations manager to address. Adequate resources are in place to ensure regular servicing of bins.</p> <p>Awareness raising of how to use the service is underway on social media.</p> <p>This forms part of normal servicing of litter bins and will be referred to the local operations manager for attention.</p> <p>This is not a matter for the litter management plan and will be referred to the Roads Maintenance Division for their consideration.</p> <p>Regular dog fouling patrols are undertaken. The plan clearly sets out the aims of Dublin city Council in relation to the issue of dog fouling awareness and enforcement.</p> <p>This will be referred to the local operations manager for attention.</p> <p>This suggestion will be referred to Area Management and the Arts Office</p>

<p>discourage graffiti.</p> <p>The iron bridge needs painting and rust protection (like the ones along the Quays)</p> <p>Involve children more in the descision making process rather than just at the end where they are viewed as agents rather than agentic.</p> <p>Bins need to be brought back under DCC control.</p>	<p>for their consideration.</p> <p>This suggestion will be referred to Area Management for their consideration.</p> <p>The Litter Prevention Officer will consider how this can be achieved through existing channels in place such as the Green Schools Programme, Picker Pals or Chomairle Na Nog.</p> <p>This is beyond the scope of the legislative provisions of the plan.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

<p>Name /Group: Joe Mooney</p> <p>Ref: LMP/STAT 062</p>	
<p>Submission: I believe that the Draft management plan contains many positive suggestions and should be broadly welcomed.</p> <p>However , a major failing in the plan is that it contains no substantial enforcement measures . I live in East Wall and witness the daily illegal dumping and littering engaged in by a minority in the community . Merchants Road is a prime example , and one which DCC have failed to address despite numerous complaints over past years and face-to-face discussions to examine issue. I do not doubt the frustration felt by DCC staff at these problems but no amount of surveillance , fines issued etc (when this does actually happen) is affecting the behaviour of offenders.</p> <p>There needs to be consequences to deter this behaviour . I am aware of the reasons offered for not pursuing certain approaches but I believe that these can be overcome if sufficient will exists.</p> <p>Fines issued for illegal dumping should be substantial and collection enforced.</p> <p>Illegal dumping should be re-classified as an anti-social offence and should carry consequences in terms of local authority housing tenancy . Put simply - if people engage in illegal dumping they should be at risk of eviction.</p> <p>An anti illegal dumping clause should</p>	<p>Response:</p> <p>This is beyond the scope of the legislative provisions of the plan. Dublin City Council does advocate for changes to primary legislation to address litter and illegal dumping.</p> <p>The collection of fines beyond those issued for fixed penalty notices is a matter for the Courts Service and Dublin City Council have no role in the application or collection of fines once a successful prosecution has been obtained in respect of an offence.</p> <p>Dumping can be addressed as a breach of tenancy agreement for local authority tenants.</p> <p>Dublin City Council is examining</p>

<p>be included in private rental agreements. Landlords should be informed if their tenants are found guilty of offences and this should have implications on contracts .</p> <p>A name & shame policy should be pursued where the details of those convicted of illegal dumping offences are made publically available. I do not believe that DCC has challenged the claim that this breaches data protection requirements.</p> <p>The waste management services should be fully restored to the local authority . As it is we have the inefficiency of multiple private companies operating in the same areas , often with a very poor service yet DCC still maintain responsibility for cleaning up and removing other waste and their spill etc. In terms of finance and efficiency a local authority operated service is preferable , though it is clear that there may be ideological and political barriers to this within DCC.</p> <p>The shared bins idea is interesting and worth exploring further.</p>	<p>issues relating to the treatment of domestic waste issues in the private rented sector.</p> <p>The issue of naming and shaming of offenders has been clearly stated to be beyond the scope of the litter pollution legislation by Government in correspondence to the local authorities.</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>This is being examined in the context of a Dublin City BETA project which is currently being progressed.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Paul Byrne</p> <p>Ref: LMP/STAT 063</p>	
<p>Submission: Enforcement measures should be strengthened further to discourage littering. There is a serious issue with the public littering public/green areas and beaches, particularly in good weather. Such offenders need to be appropriately dealt with when caught littering and anyone considering littering needs to be aware of the consequences. This can be achieved by targeted ad campaigns/warnings etc.</p>	<p>Response: This is beyond scope of the legislative provisions of the plan. Dublin City Council does advocate for changes to primary legislation to address litter and illegal dumping.</p> <p>Dublin City Council does carry out targeted awareness campaigns and the plan clearly sets out that this will continue.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Veronica Brady</p> <p>Ref: LMP/STAT 064</p>	
<p>Submission: Whatever steps are taken they should come hand in hand with a long term public educational program about our natural habit. The extent of illegal dumping is out of control. A survey should be conducted to understand why people are choosing to dump illegally or not take their rubbish home. In conjunction with this more bin warden/dog fouling wardens should be put out into the public space to ensure people are caught and fined.</p>	<p>Response: Dublin City Council is in the process of reorganising its enforcement services to provide a more effective response to enforcement issues.</p> <p>Consideration will be given to carrying out a survey as suggested in the context of objective 12 and 13 of the implementation plan.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

<p>Name /Group: Grace Maguire</p> <p>Ref: LMP/STAT 065</p>	
<p>Submission: ban dogs from parks as they are destroying them and their owners who do not follow rules that are displayed. They are not picking up full stop.</p> <p>Additional bins for Dartmouth Square park.</p> <p>Dumping -people were dumping all over Ranelagh. People were spotted driving up and dumping stuff out of their cars. Others who do not pay for their bins are putting their waste into Luas bin or others bin.</p> <p>Perhaps we need additional bins to cater for demand.</p>	<p>Response: This is beyond the scope of the legislative provisions of the plan.</p> <p>This will be referred to the Parks and Landscape Services Division for their consideration.</p> <p>The plan sets out Dublin City Councils aims and objectives to address illegal dumping and those who are not using authorised waste collector to dispose of their waste.</p> <p>The plan sets out Dublin City Councils commitment to maintaining and improving the stock of litter bins and providing additional high capacity bins where appropriate.</p>
<p>Recommendation: No amendment to plan.</p>	
<p>Amendment: None.</p>	

Name /Group: Sean Brennan Ref: LMP/STAT 066	
Submission: <p>Would like to see a penalty system for Fast Food outlets with a levy on the non-biodegradable containers they use.</p> <p>Also Fast food outlets should pay more rates then non retail outlets to compensate for additional resources needed to clean up the litter they generate.</p> <p>Obviously more bins and would like to see Big Belly bins along the Dodder walkway and in parks to discourage illegal dumpers.</p> <p>We'd like to see more classical bins in the Village Cores especially in Heritage Villages such as Donnybrook promoting Dublin City (with Crest) and also shared space on the bins to allow community groups advertise clean-ups and events.</p> <p>Enhancement of the Autumn Leaves campaign with strategically placed leaf composting bins on display to encourage public participation.</p> <p>A blue or green flag system for Villages who comply with environmental friendly initiatives.</p>	Response: <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>The plan has no legislative scope to effect changes in commercial rates.</p> <p>The issue of bins along the Dodder walkway will be considered in the context of the aims and objectives of Dublin City Council to work with all stakeholders to improve litter issues in blue spaces as set out in the plan.</p> <p>The provision of cast iron style bins in heritage areas is in place and can be examined locally.</p> <p>The environmental awareness section in Dublin City Council will work with community groups to achieve this type of objective.</p> <p>The Green Flag award scheme is managed by An Taisce in Ireland. This suggestion will be referred to them for consideration and advice.</p>
Recommendation: No amendment to plan.	
Amendment: None.	

<p>Name /Group: Cllr Cieran Perry</p> <p>Ref: LMP/STAT 067</p>	
<p>Submission:</p> <p>The submission makes a number of observations under the heading of resources partnership and enforcement.</p> <p>Waste management is a very labour intensive operation and staff resources are key. The increased use of technology is to be particularly welcomed but if there is no investment in extra staff resources this plan will fail. While recruitment has increased over the last couple of years it is still not at the pre economic crash levels.</p> <p>While the overall proposal of a partnership with residents, communities and businesses is a good idea, it becomes problematic if the intention is to replace lost staff resources with increased community/business participation. In the past, communities have been very willing to engage with Dublin City Council to tackle various issues which affect them, from anti-social behaviour to illegal dumping, but if such partnerships are to succeed communities need to be treated as equal partners. Support for community clean ups and the provision of a leaf collection service are a very successful example of a real partnership between communities and Dublin City Council.</p> <p>I believe the lack of enforcement in relation to illegal dumping is the major cause of what can only be described as a continuing waste crisis.</p> <p>The majority of residents and businesses do not engage in illegal dumping or littering. It is a very small minority who cause the majority of the problems. I believe enforcement is the only way to tackle these people.</p>	<p>Response:</p> <p>In recent years, Dublin City Council has consistently ensured that staffing levels are maintained at an agreed level to deliver a full range of waste management services. This will be maintained over the lifetime of this plan.</p> <p>Dublin City Council has focused on engaging in partnerships with communities and voluntary groups to build sustainable initiatives and recognises the value of these partnerships through its support of community awards such as the City Neighbourhoods Awards and Pride of Place awards. The plan sets out the aim of Dublin City Council to build on this and have greater engagement with communities on environmental issues</p> <p>Dublin City Council is in the process of reorganising its enforcement services to provide a more effective response to enforcement issues and to establish a citywide enforcement team.</p> <p>This was begun under the last litter management plan and a commitment was given that any outstanding objectives of the last plan would be completed.</p>

<p>Nowhere in the draft is there a practical suggestion of how to improve the effectiveness of enforcement.</p> <p>The current plan proposed the establishment of a citywide enforcement team, which I believe would have been a good idea but the draft has no mention of such a plan.</p> <p>The Litter Management Plan 2016 - 2018 proposed the expansion of door-to-door enforcement campaigns across the city but apart from a small number of pilot projects this proposal, which has proved successful in trials, has not progressed. In my previous submission I noted that <i>“the lack of support from waste management officials outside the local area for the pilot and it’s continuation doesn’t inspire confidence that any expansion of the campaign citywide will be successful”</i> and unfortunately my prediction was correct.</p> <p>This door-to-door enforcement is labour intensive but very effective if carried out properly. The costly aspect of the process is the initial household visit and subsequent visits but once the householder is signed up to a waste collection service there will be no requirement to revisit. The labour intensive aspect of the process can be seen by some of the results of two inner city trials – in the North Inner City approximately 600 addresses were visited revealing a compliance rate of 30%. After another two rounds of surveys compliance had reached over 50%. Continuing resources would have increased the compliance rate but unfortunately this investment was not forthcoming. In the South Inner City investment in overtime and security had enabled over 3500 properties to be examined. The successful trials in both inner cities could provide a template for a citywide enforcement team.</p> <p>In my submission on the current Litter Management Plan during the consultation phase I identified the</p>	<p>A large-scale compliance campaign is set out as one of the aims and objectives of the plan. This campaign is set to commence with a plan to investigate waste arrangements in 3000 households. The campaign has been approved for funding through the existing revenue budget and under the Anti-Dumping Initiative 2020.</p> <p>This is beyond the scope of the legislative provisions of the plan.</p>
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<p>remunicipalisation of the waste collection service as an important requirement. The fact that there is now political support on the council for such an action is hugely positive. I suspect council management remain ideologically opposed to re-entering the waste collection service but in the current situation DCC find themselves 'unofficially' providing a waste collection service in tackling the illegal dumping. The cost of this unofficial service is unknown as DCC don't record all illegal dumping collections. An indication of the extend of the problem is that in the Central area alone over 100 tons of illegally dumped materials were collected last December.</p> <p>It has been acknowledged by senior management in DCC that there is a difficulty securing convictions against offenders with the judiciary being unsympathetic to the Local Authorities. The draft plan proposes a 'Communications Plan' but does not identify the courts as an area which could benefit from increased communications. I have previously called for the Chief Executive to write to the Presidents of the relevant courts to highlight the difficulties being experienced by Dublin City Council in prosecuting individuals suspected of illegally dumping.</p> <p>Naming and shaming is a very effect method of tackling illegal dumping but Dublin City Council have been reluctant to use this tactic due to data protection concerns. If such a concern is genuine and if Dublin City Council are serious about tackling illegal dumping we must progress.</p> <p>Modern, high-tech, high quality surveillance technology is available and Dublin City Council must increase the use of such equipment in the illegal dumping blackspots. Currently the level of fines emanating from CCTV is disappointing.</p> <p>Dog litter continues to be is one of the</p>	<p>This suggestion can be incorporated into the considerations of the communications plan outlined in the plan.</p> <p>The issue of naming and shaming of offenders has been clearly stated to be beyond the scope of the litter pollution legislation by Government in correspondence to the local authorities.</p> <p>Dublin City Council has set out in the plan that it intends to continue to use CCTV for the purposes of enforcement. The aim is always to achieve a reduction in dumping and the identification of offenders.</p> <p>The plan clearly sets out a number of</p>
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<p>most contentious issues I have encountered and, despite an increase in signage, there appears to be no improvement in the proliferation of the problem, as can be seen from the fines issued mentioned above. The miniscule number of dog foul fines issued by Litter Wardens would appear to indicate either a lack of interest in tackling this issue or an expectation that such fines will not be paid. The draft plan again provides no concrete</p> <p>A pilot program in the South Inner City using a partnership between the Gardai and authorised council officers has proven successful but the required resources have not been invested by Waste Management. For a relatively small cost I believe this program could be rolled out citywide and have a significant effect on this disgusting problem. I believe such as a visible campaign would inspire public confidence in the council's ability to tackle such a contentious problem.</p>	<p>aims in respect of tackling dog fouling including carrying out patrols and enforcement campaigns and states in objective 28 the aim to strengthen enforcement activity with relevant bodies such as An Garda Síochána.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

<p>Name /Group: Cllr Joe Costello</p> <p>Ref: LMP/STAT 068</p>	
<p>Submission:</p> <p>1. Dublin City Council needs to be in control of the domestic municipal waste collection as well as street cleaning and the collection of rubbish and dumped waste matter. Only when the entire process of waste management comes under the control of the local authority can a truly comprehensive management system be put in place. We should speed up the remunicipalisation of waste collection. The present system of private waste collection is contributing enormously to the problem as multiple waste collectors are operating in each urban area, criss-crossing the city causing unnecessary emissions and causing confusion for residents who often put out bags and bins at different times and days on the same street.</p> <p>There is a culture of carelessness about waste across many sectors of Irish society. We must endeavour to change that culture. Much good work can be carried out in our schools at both primary and second level. Many schools for example are now Green Schools work towards addressing climate change by teaching children about the environment to respect and protect it. Green Schools should also be Clean Schools and the importance of dealing with litter, rubbish dumping, dog dirt etc. should be treated as being equally important as traffic emissions and global warming.</p> <p>3. Legislation and bye-laws dealing with waste management are largely about addressing bad behaviour through fines and penalties. These are necessary but do not address the causes of the problem. Much of the</p>	<p>Response:</p> <p>This is beyond the scope of the legislative provisions of the plan.</p> <p>The Green schools programme includes modules on resources, waste and litter. Schools are also encouraged to take part in the City Neighbourhoods Awards programme.</p> <p>Dublin City Council is examining issues relating to the treatment of domestic waste issues in the private rented sector. In order to address the issues contained in the suggestion specific</p>

<p>problem comes from rented accommodation. I believe that landlords and management companies should be made jointly responsible with their tenants for waste management. To do so would require an amendment to the Litter Pollution Acts.</p>	<p>amendments to legislation would be required that are beyond the legislative scope of the Litter Pollution Act. These are beyond the legislative scope of the provisions of the plan.</p>
<p>Dublin City Council is of course the biggest landlord in the City and has a particular responsibility to ensure that all its tenants and their families are fully aware of what is required to keep their homes and complexes clean and tidy and dispose properly of their waste. DCC should draw up a special strategy for each DCC housing complex and a special task force consisting of councillors, residents and DCC officials should be established to implement it.</p>	<p>Dublin City Council is carrying out a project to enhance waste compliance and segregation through the better management of waste storage space within complexes and providing education and facilitation of tenants to achieve this. This is being carried out on an area by area basis and includes workshops for tenants. Reports on progress are provided regularly to the City Council and any suggestions to improve this project can be incorporated into the project. This suggestion will be referred to the public domain officer managing the project.</p>
<p>The new Government will undoubtedly have a special focus on the environment and waste management. Thus, there should be an injection of funding for resources and staffing to implement new policies Funding from central Government is crucial to tackling the problem comprehensively. Dublin City Council should immediately campaign for greatly increased funding from Government.</p>	<p>Dublin City Council would welcome any additional funding streams that are made available to address litter related issues.</p>
<p>The present DCC area-based approach is the correct one. It should operate on a grid system and every street should be covered every day. Streets that are littered on a daily basis are not susceptible to cleaning in the normal fashion and will require special measures. Otherwise they simply exhaust resources. A special Task-Force needs to be established for the North Inner City.</p>	<p>This suggestion will be referred to the area manager for consideration regarding the establishment of a task force A sub committee of the relevant area committee has already been established to examine issues relating to illegal dumping. Environmental issues are also currently being addressed in the context of the existing north east inner city programme.</p>
<p>The Fleet of vehicles used by DCC</p>	<p>Dublin City Council Waste Management Services currently</p>

<p>should be electric and emission free. The fleet and staff need to be increased by 50%.</p>	<p>operate a fleet of in excess of 200 vehicles and almost 500 operational and support staff. These numbers are designed to provide a high quality of street cleaning services to the city and are comparable with other similar sized city services. Dublin City Council Waste Management Services are working towards the introduction of electric vehicles into this fleet where possible and a number of vehicles are already electric.</p>
<p>Mobile cameras should be widely used with public signs warning of prosecution, including naming and shaming.</p>	<p>Mobile CCTV is in use and the plan outlines that this will continue to be the case. Signage is installed at any locations that CCTV is in operation. It has been clearly communicated to local authorities from central government that the naming and shaming of offenders is not provided for under the provisions of the Litter Pollution Act.</p>
<p>Some areas have strong communities and strong engagement by residents. Dublin city Council can work closely with these communities. Where communities are not strong and have few structures, DCC should endeavour to engage with these communities and provide support for them to participate more fully.</p> <p>DCC should provide a wide range of centres for people to recycle their waste. For example, there is no public facility for composting organic waste matter, including food. This should be provided in greatly expanded and increased Bring Centres. Consideration should also be given to providing black bin facilities in Grangegorman and other Bring Centres.</p>	<p>Dublin City Council works closely with communities and seeks to engage with all communities through the Litter Prevention Officer, Public Domain Officers and Environmental Liaison Officers. The plan clearly states the objective to continue to work with and engage with communities in relation to environmental issues.</p> <p>Food waste recycling is available at Dublin City Council civic amenity facilities. There is limited capacity to increase waste streams accepted at bring centres. The suggestion will be referred to the environmental awareness officer for consideration.</p>
<p>Most people do a spring cleaning of their households each year. Dumping can happen as it did on a large scale during Covid-19 because people were</p>	<p>Dublin City Council provide an on demand low cost service for disposal of bulky household items. Bulky household waste can also be</p>

<p>at home for a long period, cleaning sheds and attics and rooms of unwanted material. There should be a free bulk collection at a certain time each year for each area and for all households.</p> <p>The cleaning of streets can be difficult where car parking is allowed. We should follow the example of the US and many European countries which facilitate cleaning of alternative sides of each street each week by banning cars from parking on both sides for a specified period once a week.</p>	<p>disposed of at civic amenity sites. The waste industry also offer a range of removal and disposal services.</p> <p>The feasibility of being able to introduce such as scheme when residential parking permit schemes can be oversubscribed and no alternative parking provision can be allocated for those with permits is considered to be difficult. The matter will be referred to the parking enforcement section for their views on whether such a scheme could be successful and how it could be progressed. Dublin City Council does provide for an on demand service to be provided in conjunction with residents as stated in the plan and aims to increase the provision of this service.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	

<p>Name /Group: Stoneybatter Pride of Place</p> <p>Ref: LMP/STAT 069</p>	
<p>Submission:</p> <p>A greater presence of street cleaners in the main village and surrounding streets would be welcome. More resources need to be spent on personnel and equipment.</p> <p>At present our residential streets outside the main village are swept just once every 12 weeks. While DCC state that an Area Inspector may increase this rate, the residential streets are not swept on a weekly basis and it is not clear when streets will be swept. The Draft Litter Management Plan commits to publishing the schedule of street cleaning. This is both necessary and welcome.</p> <p>It is disappointing to see streets that have been swept still quite dirty. Underneath parked cars and the kerb side of cars often remain untouched. The US system of doing different sides of streets on alternate days should be trialled in Stoneybatter.</p> <p>Many of the worst litter offenders live in landlord multi-unit accommodation. We believe that landlords and management companies should be held jointly responsible with the</p>	<p>Response:</p> <p>Dublin City Council Waste Management Services currently operate a fleet of in excess of 200 vehicles and almost 500 operational and support staff. These numbers are designed to provide a high quality of street cleaning services to the city and are comparable with other similar sized city services.</p> <p>The feasibility of being able to introduce such as scheme when residential parking permit schemes can be oversubscribed and no alternative parking provision can be allocated for those with permits is considered to be difficult. The matter will be referred to the parking enforcement section for their views on whether such a scheme could be successful and how it could be progressed. Dublin City Council does provide for an on demand service to be provided in conjunction with residents as stated in the plan and aims to increase the provision of this service.</p> <p>Dublin City Council is examining issues relating to the treatment of domestic waste issues in the private rented sector.</p>

<p>tenants/occupiers for breaches of the byelaws related to waste management. This may require changes to primary legislation, the Litter Pollution Acts and DCC should put appropriate proposals to Government.</p> <p>The new byelaws for the storage, presentation and segregation of household and commercial waste should be strictly implemented.</p> <p>The praiseworthy initiative by DCC to knock on doors and check if households are registered with a legal waste provider must be continued until every household is investigated. Many households are flouting the law.</p> <p>The use of CCTV can be very effective in identifying people who are regularly in breach of proper waste disposal. Mobile cameras should be used extensively and culprits should be prosecuted, named and shamed.</p> <p>There is a problem of overflowing bins in the Village. The Draft Litter Management Plan commits to rolling out QR codes on all bins to facilitate reporting of bins that are full and overflowing. These have not yet been installed in Stoneybatter. There is a need for more public bins in the Village which would be emptied on a regular basis.</p> <p>The use of innovative technological solutions should be rolled out across the area. Waste Management section has collaborated with tech companies through Enterprise Ireland Small Business Innovation Research projects. Projects included the use of drone technology, battery cameras that acted as a deterrent by sounding a noise when dumping was detected and the data analytics. Consideration should be given to scaling up some of these projects and Stoneybatter would be an ideal testing ground for</p>	<p>In order to address the issues contained in the suggestion specific amendments to legislation would be required that are beyond the legislative scope of the Litter Pollution Act. These are beyond the legislative scope of the provisions of the plan.</p> <p>The plan sets out that a large-scale compliance campaign is to be undertaken in respect of the Waste bye-laws.</p> <p>Mobile CCTV is in use and the plan outlines that this will continue to be the case. Signage is installed at any locations that CCTV is in operation. It has been clearly communicated to local authorities from central government that the naming and shaming of offenders is not provided for under the provisions of the Litter Pollution Act.</p> <p>QR code technology is in place on all public litter bins. If any bins do not have a QR code attached this will be rectified.</p>
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<p>further innovations.</p> <p>Dublin City Council should advertise and roll out apps such as See It Say It and support citizen initiatives such as the Open Litter Map which maps plastic waste globally.</p> <p>There is a need for a free Bulky Items collection annually to enable households get rid of unwanted furniture without some causing unsightly dumping. There have been many household clear-outs over the COVID-19 lockdown and the level of dumping of furniture etc. has increased. A free collection as we emerge from lockdown and thereafter once annually would be welcome. The existing City Neighbourhood Awards should be continued and expanded and the Dublin Community Clean-up Day should be promoted in all City communities.</p> <p>Citizen awareness is essential to success. There should be local workshops for local communities with built in local supports and incentives.</p> <p>There should be greater engagement between waste management and the Parks Department. The Greening Stoneybatter project provides an excellent opportunity to develop such co-operation. Stoneybatter was recently recognised as Ireland's first Pollinator Friendly Community.</p> <p>As the street spraying is discontinued there is a need to have a weeding programme in place. While residents are positive about the decision not to spray, there is still a need to remove weeds from the street.</p> <p>DCC is involved in Green Schools at primary and second-level. These should be refocussed on Green and</p>	<p>Dublin City Council supports the see it say it app via the EPA. Dublin City Council will Liaise with Open Litter Map to assess how this could be of benefit.</p> <p>Dublin City Council provide an on demand low cost service for disposal of bulky household items. Bulky household waste can also be disposed of at civic amenity sites. The waste industry also offer a range of removal and disposal services.</p> <p>Dublin City Council aims to have all communities involved in all initiatives and the Litter Prevention Officer is dedicated to achieving this aim</p> <p>Dublin City Council works closely with communities and seeks to engage with all communities through the Litter Prevention Officer, Public Domain Officers and Environmental Liaison Officers. The plan clearly states the objective to continue to work with and engage with communities in relation to environmental issues.</p> <p>The plan clearly states that Dublin City Council intends to increase collaboration between internal departments. This includes the Parks and Landscape Services Division who contributed to the development of the plan.</p> <p>This will be referred to the Roads Maintenance Division for their consideration</p> <p>The Green Schools programme includes modules on resources, waste and litter. Schools are also</p>
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<p>Clean Schools with a special emphasis on litter and rubbish.</p> <p>we suggested that it is time to build up a stronger relationship between DCC waste management and local communities and build a working partnership. This is in everyone's interests.</p>	<p>encouraged to take part in the City Neighbourhoods Awards programme.</p>
<p>Recommendation: No amendment to plan</p>	
<p>Amendment: None</p>	