Comhairle Cathrach Bhaile Átha Cliath
Dublin City Council

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Central Area Management
Dublin City Council
51-53 Sean Mac Dermott Street Lower
Dublin 1 D01 HW 44

**To Central Area Councillors**

**Date 12th June 2026**

Dear Councillors,

Thank you for your attendance at the meeting yesterday, 11th June, in the Central Area Office and those who joined via Teams, regarding the proposed transition from kerbside waste presentation in plastic bags to reusable waste receptacles in the Phase 3 Area.

# Introduction

Before addressing the specific concerns raised at the meeting, it is important to outline the rationale underpinning this initiative.

The proposed removal of the derogation permitting kerbside waste presentation in plastic bags arises from ongoing waste management challenges experienced across Dublin City, including in the Dublin 7 area. Plastic bags left on public footpaths are frequently torn open by birds, vermin and, more recently, individuals searching for containers eligible under the Deposit Return Scheme (DRS). This results in littering, contamination of waste streams and unhygienic conditions on public streets.

In addition, untagged and illegally dumped bags are often left alongside legitimately presented waste, creating enforcement difficulties and contributing further to litter and environmental degradation. The resulting clean-up operations place a significant burden on Council cleansing resources and budgets, diverting staff from planned cleansing operations and street-cleaning activities. This level of reactive intervention is not sustainable and represents an inefficient use of public resources.

The designation of certain streets as “bagged streets” was always intended as a temporary arrangement, with the eventual transition to reusable receptacles anticipated.

It is also important to note that waste segregation is a legal requirement under national waste legislation. Householders are required to separate food waste from residual waste streams, while waste collectors are required to provide systems that facilitate the separate storage and collection of residual waste, recyclables and organic waste. Reusable receptacles support these requirements and provide a clearer framework for compliance.

Further, the waste collectors have highlighted significant health and safety risks for their staff while handling plastic bags, with a risk of needle stick injuries or injury due to glass. The presentation of waste in plastic reusable receptacles is seen as the preferred option to mitigate these risks and is commonly accepted as the “best practice” for the storage and presentation of residential waste in the industry.

# Response to Issues Raised

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**(i) Cost Implications for Low-Volume Households**

Dublin City Council regulates the presentation of waste through the Presentation of Waste Bye-Laws. However, waste collection services, pricing structures and service options are matters for licensed private waste collection companies operating within a competitive market.

Residents remain free to select the provider and pricing plan that best suits their household requirements. We therefore encourage residents to engage with alternative service providers where appropriate and to explore the range of collection options available.

Waste collectors have advised that they offer a variety of receptacle sizes and collection plans designed to accommodate different household types and waste volumes. In addition, neighbouring households may legally share waste receptacles where suitable arrangements can be agreed, which may help address concerns regarding cost and storage.

The waste collectors have recently advised that they will offer a “Pay per lift” option for reusable receptacles, and which may be suitable for those households who only produce small amounts of waste. Typical fees for this option include an introductory annual fee of €39.99, followed by lift fees of €5.50 for residual, €4 for organic and €4.50 for dry mixed recyclable waste.

We note the concern raised that waste collectors are selective on where they service, however, there is no restrictions on service imposed by DCC, provided the waste collector has a valid Waste Permit License. We have raised this issue with the collectors and have recommended that all residents should be able to avail of all waste collection options on offer, particularly those options that benefit households who produce low volumes of waste, irrespective of location.

**(ii) Littering Associated with Bagged Waste**

The Council does not accept the suggestion that littering associated with bagged waste has been overstated.

On a 24hour basis Council cleansing crews respond daily to incidents involving waste bags that have been torn open by birds, vermin or human interference. These incidents frequently result in waste being dispersed across footpaths and roadways, contamination of recyclable and organic materials, and unhygienic conditions on the city’s pavements that can lead to rat infestation.

In many instances, additional cleansing operations are required before routine street-cleaning services can commence, resulting in duplication of effort and additional expenditure of public resources. This practice is not sustainable.

**(iii) Consultation and Local Considerations**

The proposed removal of the derogation has been the subject of ongoing public discussion for a considerable period. The issue has received significant coverage in national and local media over the past year.

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The Dublin 7 area forms part of Phase 3 of a citywide programme to eliminate kerbside waste presentation in plastic bags. Phase 1 commenced in November 2025 in the South Inner City, while Phase 2 commenced in May 2026 in the North Inner City.

Elected members have been aware of the programme since late 2024, and formal communication regarding the proposed implementation of Phase 3 was issued to Councillors in the Central Area during April 2026.

Recognising concerns regarding communication and engagement, Dublin City Council facilitated a leaflet drop to residents on weekend of the 6th June, outlining the proposed changes and the collection options being made available by waste service providers.

While the contractual relationship exists between householders and private waste collectors, the Council continues to engage regularly with waste collection companies to ensure that residents are appropriately informed of available options and service arrangements.

To further address the concerns of the Councillors around communication, Dublin City Council will conduct additional communication campaigns between now and the revised implementation date of the project. We will ask the waste collectors to roll out further communication campaigns also, advising of the various waste storage options and collection plans that are on offer.

**(iv) Suitability of Reusable Receptacles in Dublin 7**

To support residents during this transition, the Council engaged with the principal waste collection companies operating within the Dublin 7 area.

These providers have indicated that they will offer a range of receptacles, including stackable 45-litre caddies and wheelie bins ranging from 80 litres to 240 litres. The smaller caddy system may be particularly suitable for households with limited storage space or lower waste volumes. Examples of the 40-litre caddies are attached for reference. In addition, caddies are available to view in the Central Area Office, Sean McDermott Street.

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The waste collectors have confirmed that they can offer a mix of caddy and wheelie bin, as they accept that "one size" will not fulfil all household waste requirements.

Waste collectors have advised that a three-caddy stackable system will be available to accommodate residual waste, recycling and organic waste streams. They have further advised that the footprint of this system is broadly comparable to that of the plastic bag currently used by households.

It is important to note, that the reusable receptacles being offered to households, are solely for the phase 3 scheme, and include a full range of reusable household receptacles currently available across Europe and in other jurisdictions. There are no further options available or being considered for Phase 3.

The Council acknowledges that some households face genuine storage constraints and accessibility issues and will continue to engage with service providers to ensure that practical solutions remain available. Shared receptacle arrangements and local agreements between households are lawful and may also assist where storage space is limited or where cost is a concern.

It should also be noted that a significant number of households in Dublin 7 are already successfully using reusable receptacles, demonstrating that compliant alternatives can operate effectively within this area.

**(vi) Operational Issues and Small Caddy Systems**

The Presentation of Waste Bye-Laws regulate both the manner and timing of waste presentation on public footpaths. As part of a wider review of the bye-laws, the Council intends to examine those presentation windows applicable outside the commercial district area, with the objective of reducing the length of time waste containers remain on public footpaths. This may assist in addressing accessibility and mobility concerns on public pavements.

At present the waste receptacle can be presented from 5.00pm the day before collection day and must be removed by 10.00a.m the day after collection, in the suburbs. We propose to reduce this window of presentation and bring it in line with presentation period in the commercial district area. We will instruct our enforcement teams to focus efforts on this requirement.

Operational issues around the movement and replacement of reusable receptacles on the public pavement after been emptied is a matter between the household and the waste collector. The customer has always the option to move to another waste collector if they are not satisfied with the current service provider.

Greyhound have advised that the stackable caddy system has been used successfully by their customers in high-density urban areas in the Dublin City Administrative Area since 2022. They consider the system to be a practical alternative to bag-based waste presentation that has been positively received. All waste collectors have indicated that a range of receptacle sizes and pricing structures are available to accommodate varying household needs. The Council will continue to work with waste collectors to address specific issue.

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It is important to note that within the Central Area, residents can still use bags and dispose of Dry Mixed Recycling in the Grangegorman Recycling Centre and Residual and Organic Waste in the North Strand Civic Amenity Site.

To support the removal of the derogation in Phase 3, the Council will consider, on a temporary basis, placing a residual waste container in the Grangegorman facility. However, there are space constraints along with licensing arrangements to take into account, but we will actively consider this option.

**(vii) Shared Waste Infrastructure**

The Council acknowledges that large-scale communal compactors, such as those operating on a trial basis in commercial parts of the city centre, are not suitable for the streetscape and road layout of the Stoneybatter area.

Such systems would require substantial road space for this infrastructure and servicing vehicles, reducing on-street parking and creating operational challenges. Additional concerns include maintenance, contamination of waste streams, fire safety and the potential for illegal dumping at these sites.

Additionally, the waste collectors have advised that smaller communal waste infrastructure units are not considered commercially viable within the existing residential waste collection framework in the Dublin 7 area. They have also cited significant challenges with finding suitable locations close to all households that would adequately meet the service needs of customers. A pilot scheme to introduce shared waste infrastructure was proposed for Stoneybatter several years ago, however it didn't proceed due to significant objection to the placement of shared waste infrastructure on public streets.

We will keep this option under review and should new innovative shared waste storage infrastructure come to our attention, its use will be considered. However, any "on street" infrastructure must be shared among waste collectors, as it is not feasible to allow each waste collector to have their own on street waste collection infrastructure.

**(ix) EU Model**

Regarding shared underground bin systems, while these operate successfully in some European cities, those cities generally operate under a fundamentally different waste collection model. In many cases, waste collection is provided directly by the municipality or through a single contracted operator with all waste charges paid by direct taxation on every household or business.

In Ireland, household waste collection is delivered through a privatised and competitive market involving multiple authorised waste collection companies. There are over 50 licensed companies who are permitted to deliver a waste collection service in the Dublin region, and therefore it is not feasible or practicable to allow a spread of underground waste collection systems to develop by privately owned waste collection companies throughout the city. Alternatively, introducing communal and shared ownership waste infrastructure, would require complex legal, operational and commercial agreements between competing private operators regarding ownership,

servicing, licensing requirements, access, liability and cost allocation, which is not feasible in a residential setting under the current operating framework.

For these reasons, direct comparisons with other European cities are often not comparing like with like. The legislative, regulatory and operational environment in Ireland is significantly different, and solutions that may be feasible within municipal waste collection systems elsewhere are not readily transferable to Dublin's privatised waste collection model.

## Recommendations

The following is a summary of recommendations: -

1. Dublin City Council have agreed to delay the implementation of the "Phase 3 - Removal of Derogation" until the **4th August** with a further short period of time allowed to enable all households to transition to new arrangements before enforcement of the Bye-Law.

2. Households can still use bags and dispose of residual, organic and DMR waste at North Strand CA site and Grangegorman Bring Centre. To support the transition in Phase 3, the council will consider installing a residual waste compactor on a temporary basis at the Grangegorman Bring Centre.

3. Dublin City Council will engage in further communication campaigns between now and the revised commencement date, to ensure all households in the Phase 3 area are fully aware of the timelines and waste collection options available.

4. DCC will engage with all waste collectors in the phase 3 area and ensure that they continue to engage with their customers, so that all customers/households are aware of the impending changes and waste storage/collection options offered.

5. DCC will conduct a full review of the Waste Presentation Bye -Laws, with the objective of reducing presentation times of waste receptacles on the public pavements in the suburb areas, and to bring presentation times more in line with Central Commercial District.

6. DCC note that the Waste Collection Plan "Pay Per Lift" was welcomed by all councillors. The plan is being introduced at an introductory offer with a reduced annual service fee of €39.99, in addition to the pay per lift fees. There was a suggestion that this service fee should be waivered for these users. While this is outside the scope of DCC to deliver, it was agreed to raise with the waste collectors to consider.

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## Conclusion

The rationale for removing the derogation has been outlined above and remains aligned with the Council's statutory obligations, environmental objectives and waste management strategy. For these reasons it is imperative that the council continues progressing towards the prohibition of plastic bag waste presentation, ensuring that all areas can benefit from the transformational improvements already experienced with Phase 1. Recent IBAL (Irish Business Against Litter) surveys have reported that in those parts of the city where bags have been removed, littering is on the decline and there is a significant improvement in cleanliness.

The Council continues to progress initiatives aimed at tackling illegal dumping, including increased enforcement activity, expanded CCTV deployment and the introduction of a "reverse register" scheme made possible through recent legislative amendments. This scheme in particular addresses those households who fail to prove they are segregating and disposing of their waste in the appropriate manner and the initial roll out will be focussed in the Central Area.

The anticipated outcomes of Phase 3 include reduced littering, improved waste segregation rates and a reduction in reactive cleansing operations, enabling Council staff to focus on planned service delivery.

To facilitate an orderly transition and to allow residents and waste collectors sufficient time to adapt to the new arrangements DCC have agreed to delay the implementation of the Phase 3 scheme until Tuesday the **4th of August**. Following which there will be short period to allow all households to transition to new arrangements before enforcement of the Bye-Law.

DCC consider this a reasonable and fair approach, as there still remains sufficient time for households who are presenting waste in bags to arrange alternative waste storage and collection arrangements.

Finally, the transition away from bag-based waste presentation on the kerbside remains a priority for the council and is the most important component of achieving a cleaner, more sustainable and legally compliant waste management system for the city.

Yours sincerely,

Barry Woods

Head of Waste Management Services (SE)