



## **DublinTown submission to the Dublin City Council Draft Litter Management Plan 2020-2022**

### **Background**

DublinTown (formerly Dublin City Business Improvement District) is the city centre's Business Improvement District. Its mandate was provided by the city centre's 2,500 businesses following a plebiscite in 2007. This mandate was renewed by a further vote of businesses in 2012 and again in the summer of 2017.

DublinTown operates a rapid response cleaning service on behalf of businesses within its membership district, as part of these operations cleaning crews working for DublinTown removed over 112 tonnes of waste during 2019 as well as over 14,000 needles and syringes. Dublin City Council also has an agreed baseline service agreement with DublinTown detailing the levels of cleansing and maintenance on the 115 streets and lanes within the DublinTown Business Improvement District (BID) area, which was agreed prior to the renewal of DublinTown in 2017.

In recent research carried out by Red C on behalf of DublinTown in January 2020 a representative sample of over 1,000 Dublin residents the respondents were asked their views on the cleanliness levels of the city centre and whether this has gotten better or worse over the last three years. While respondents state that on average the south city area was broadly on a par with cleanliness levels over the last three years, 38% of respondents stated that the northside of the city had not improved and only 11% stating the north city was cleaner, while 51% of respondents said that the area was on par. This shows a net balance of 27% believing the north city was dirtier now than three years ago. It is within this context that DublinTown makes its submission on the Litter Management plan.

### **Street washing**

A stated aim within the 2020-2022 document is the "Improved power washing of urban villages and key locations." This is to be welcomed. A priority for city centre businesses is the cleansing of pavements and carriageways, especially during periods of prolonged dry weather when street staining becomes more noticeable. This is of a specific concern in areas of greater pedestrianisation and high footfall such as Grafton Street, Henry Street, O'Connell Street, Nassau Street and Westmoreland Street.

We would suggest that additional investment be made in the purchase of power washing equipment and that these be focused on main city thoroughfares which have the highest levels of footfall, especially during periods of prolonged dry weather.

## **Dog fouling**

*As stated in the actions and targets section - 110 Dog Fouling bins installed across city at green spaces, park entrances and high footfall dog walking locations as agreed with the Area Offices. Standard litter bins are also in place at many park entrances.* – this is the stated update as part of the proposed plan. While this is to be welcomed it should be noted that the issues of dog fouling are an issue not only around parks but increasingly within the core city centre and DublinTown requests the further expansion of the dog fouling bin programme to be supported by information and advertising campaigns to highlight their use, and where appropriate the issuing of fines for non-compliance.

## **Waste Segregation**

DublinTown would like to see greater waste segregation, which would include the introduction of compost bins in the city centre for organic waste. This would seek to clarify any confusion regarding the use of compostable single-use cups. DublinTown would advocate for the greater use of re-usable cups and similar equipment, following the lead of such as initiatives as by coffee chain Boston Tea Party in the UK, which [stopped using disposable cups in June 2018](#) and will stop accepting single used plastics from suppliers by 2020.

Additionally, DublinTown calls for bins to facilitate the recycling of plastic and aluminium as well as organic waste in a significant number of key, high-footfall locations around the city centre. We would also advocate for the trial of reverse vending machines which may act as an additional incentive to discourage landfill disposal. Following the installation of Ireland's first reverse vending machine, which opened in County Monaghan in September 2019, we would encourage the piloting of such a scheme in Dublin.

DublinTown sees scope for the continued use of [Bigbelly WiFi-enabled smart bins](#) throughout the city centre, which are able to communicate when the waste reaches 85% capacity as well as compacting waste 6-8 times that of a traditional bin through a built-in solar compactor. Furthermore, Dublin Town supports the increased use in technology in the city's waste management regime.

## **Waste Collection**

Dublin City Council may wish to assess the feasibility and legal implications of tendering for commercial and household waste collection on a district by district basis. This would ensure a more efficient waste collection regime as fewer vehicles would be required to service each district as this would be the responsibility of a single collector and as such the collector in the area would be responsible for missed collections, for example tendering on the basis of Dublin districts. We understand that this may require a review of the bye-laws

DublinTown would like to see requirements put in place which would require all waste collectors to collect all waste from city streets at an appropriate hour. There is an obvious shift in terms of increased night-time activity around the hospitality sector, and it is not appropriate that people wishing to dine and socialise in the city centre are greeted by waste on their arrival into the city.

Use of city bye- laws should strictly limit the times that waste should be collected. There should also be requirements that collections taking place in narrow streets and back lanes are undertaken by appropriately sized vehicles. It is not acceptable that vehicles are mounting pavements and damaging public realm in service lanes and side streets.

DublinTown encourages the use of appropriate waste containers – this may include bins or reusable receptacles for bag and tagged waste to prevent bags being torn open by vermin. Trial wicker/plastic lattice bin covers are one such solution and DublinTown backs such a trial scheme and would be happy to work on trials of such schemes with the City Council.

We understand that this may require amendments to bye -laws and this is something DublinTown and its members businesses would support. DublinTown would be happy to cooperate with Dublin City Council in its districts.

### **Education and Policy**

Dublin Town supports litter prevention education programmes. Dublin Town supports the increased prevention of the use of single use plastics. This would include an information and education process, promotion of alternatives including steel straws, re-usable cups, non-use of plastic cutlery etc., and the greater use of glass and plastic bottle banks.

Dublin Town supports steps towards the removal of single use plastics and would be happy to partner with Dublin City Council in relation to the promotion of alternatives.

Every day our staff see people littering without concern in the city centre. However, businesses regularly find themselves fined for very minor breaches in the code, including issues which businesses were unaware were breaches or have had their waste tampered with. This has fed a belief amongst many businesses, that there are double standards at play. Business feedback suggest that while litter wardens will fine businesses for any transgression of rules such enforcement measures are not extended to members of the public and this had led to a feeling that businesses are being treated unfairly

Members of the public are free to litter while businesses are held to exacting standards that are often impractical. Dublin own supports the use of enforcement powers to fine people caught littering on the city streets, and the publication of names of those convicted littering offences.

DublinTown advocates for greater use of litter wardens in the city centre to encourage the observation of on the spot fines, especially given the context that the fine to collection ratio is incredibly low.

### **Pest Control**

In recent years, seagulls have migrated inland, feeding from open refuse receptacles and refuse bags, harassing pedestrians carrying food and creating an unnerving atmosphere for people on Dublin streets. DublinTown, working with Dublin City Council, will pilot a flat pack cover that acts as a removable structure over refuse sacks on city streets for businesses to utilise.

DublinTown believe the pilot scheme, once rolled out across the city centre, is one of a number of measures, including mandated refuse collection times, that will help to address the growing issue of seagulls and vermin.

Plastic bags are not meeting the needs of businesses in relation to presented waste as all too often bins are attacked by vermin or become targets for antisocial behaviour. It is suggested that consideration be given to the introduction of wheelie bins for the segregation of waste into general, recycling and composable waste. Failing that Dublin Town calls for the use of bin covers that are rodent and seagull proof.

### **Abandoned Bicycles**

Dublin Town would welcome the speedier removal of abandoned bicycles, including provisions to be more proactive with tagging bicycles in terms of efficiency and pace.

### **Conclusion**

DublinTown is committed to the continued observance of a baseline agreement with the City Council. DublinTown is also enthusiastic to work with member business and the City Council for piloting and trialling of new initiatives to support awareness and educational campaigns.

DublinTown would appreciate the opportunity to feed into appropriate waste or litter management by-laws that may result from this consultation.

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