



WASTE COLLECTION CHARGES AND LOW-INCOME HOUSEHOLDS

Waste collection charges and low-income households

November 2003

CONTENTS

1	Introduction	5
2	Overview of poverty and indebtedness	8
3	Policies relating to waste collection charges	10
4	Operation of waste collection charges	16
5	Conclusions and recommendations	21

1 Introduction

Combat Poverty is a statutory body whose aim is to prevent and eliminate poverty and social exclusion in Ireland. The functions of Combat Poverty include research on poverty and advice on social and economic policies relating to poverty. In this context, Combat Poverty was asked to prepare a report on waste collection charges and low-income households by the National Advisory Committee of the Money Advice and Budgeting Service (MABS). The committee had identified waste collection charges as a factor causing indebtedness among households using the money advice service. MABS projects at local and regional levels had also highlighted this issue.

The objective of this report is to provide an overview of waste collection charges and the issues arising for low-income households. Collection charges to dispose of household waste are based on the 'polluter pays' principle. This principle requires the polluter to pay for the collection, treatment and disposal of household waste. The charges are implemented by public (local authority) and private waste collection bodies, with the range of operators varying from one local authority area to another.

A key concern is that the polluter pays principle does not take into account ability to pay the charge, with resultant difficulties for low-income households, especially as the charges have increased in recent years to several hundred euros a year. A waiver system for low-income households is provided in some local authority areas depending on the mix of waste collection bodies. There are also different ways in which the charges are levied, which can have implications for budget management in low-income households.

The policy context for the study is the National Anti-Poverty Strategy (NAPS), which is the cross-departmental initiative designed to place the needs of poor households at the top of the policy agenda. Adequacy of income is one of the themes of

the strategy, with the aim to provide sufficient income for a person to live in a manner compatible with human dignity. NAPS identifies income-related support services as a key dimension of income adequacy, such as the provision of social and public services, indebtedness and access to financial services. Waste collection charges clearly fall into this category.

The terms of reference of this study are as follows:

1. To set out the extent of poverty and indebtedness
2. To review government policy on waste collection charges
3. To outline the implementation of waste collection charges at local level and the impact on poorer households
4. To make recommendations for reform of waste collection charges from a low-income perspective.

The study is based on a review of documentation, interviews with key policy interests and a survey of local authorities. The survey had two stages: in the first stage, all local authorities were contacted and asked to provide details of their refuse collection system; in the second stage, a sample of five local authorities was examined in greater depth. Table 1 outlines the organisations that were contacted in the course of the study and for what purpose.

Many organisations co-operated with this study, in particular the five selected local authorities. Valuable assistance was provided by personnel from the Money Advice and Budgeting Service, especially Maria McCaul, Letterkenny MABS; Patricia Quinn, Western Region; and Liam Edwards, national co-ordinator. The study was carried out by Vera Brophy and Naomi Feely, post-graduate students on research placement with Combat Poverty in 2003. The study was overseen by Jim Walsh, head of research and policy in Combat Poverty and a member of the MABS National Advisory Committee.

Table 1: Organisations contacted in relation to waste collection charges

Organisations	Rationale for contact
Local Authorities	<ul style="list-style-type: none"> ■ To establish the cost of household refuse collection, the refuse collection method employed, payment methods, availability and conditions of waiver scheme ■ To ascertain the linkages between waste collection charges and corporate policy on poverty, including the role of social inclusion units where these exist
Money Advice and Budgeting Service	<ul style="list-style-type: none"> ■ To identify the nature and extent of the financial problems associated with the payment of waste collection charges
Private Operators ¹	<ul style="list-style-type: none"> ■ To establish the cost of private refuse collection, the type of collection method employed, the payment methods available and the availability of waiver
Health Boards	<ul style="list-style-type: none"> ■ To ascertain whether the exceptional needs payment within the Supplementary Welfare Allowance² scheme is awarded in respect of refuse collection charges
Department of the Environment, Heritage and Local Government	<ul style="list-style-type: none"> ■ To establish the approach of the Department to the implementation of waste collection charges at a local level ■ To ascertain the linkages between policy on waste collection charges and corporate policy on poverty, including the role of the social inclusion unit in the Department

¹ Private operators refers to private operators permitted to collect domestic refuse in certain local authority areas. Permission to collect domestic refuse is granted by the relevant local authority.

² Supplementary Welfare Allowance provides a basic weekly allowance as a right to eligible people who have little or no income. Within the scheme there is a provision for an exceptional needs payment. This payment is awarded for once-off expenses.

2 Overview of poverty and indebtedness

2.1 Poverty trends

The National Anti-Poverty Strategy (NAPS) is the government plan for reducing and preventing poverty. This strategy defines poverty as follows:

People are living in poverty if their income and resources (material, cultural and social) are so inadequate as to preclude them from having a standard of living which is regarded as acceptable by Irish society generally. As a result of inadequate income and resources people may be excluded and marginalised from participating in activities which are considered the norm for other people in society.³

The two measures of poverty that are generally used are relative income poverty and consistent poverty.⁴ Relative income poverty is based on the proportion of the population falling below a certain income level, typically 60 per cent of median disposable income. In 2001, 22 per cent of the population had a weekly income less than this threshold (equivalent of €156 per week). This was an increase of 2 per cent from the 1998 figure, reflecting widening income inequality. Consistent poverty refers to a combination of relative income poverty and an enforced lack of one or more items on a basic deprivation index.⁵ In 2001, 5.2 per cent of the population were living in consistent poverty, down from 8.2 per cent in 1998.

Certain groups are at a greater risk of poverty than others. The NAPS identifies groups at high risk of poverty as: Travellers,

3 Government of Ireland (1997), *Sharing in Progress – National Anti-Poverty Strategy*, Dublin: Stationery Office

4 Government of Ireland (2003), *National Action Plan against Poverty and Social Exclusion 2003-2005*, Dublin: Office for Social Inclusion

5 The eight indicators of basic deprivation in the consistent poverty measure are:

- New, not second hand clothes
- A meal with meat, fish or chicken every second day
- A warm, waterproof coat
- Two pairs of strong shoes
- A roast or its equivalent once a week
- One day without a substantial meal in the last two weeks
- Go without heating in the last year through lack of money
- Experienced debt problems arising from everyday living expenses or availed of charity

Nolan *et al* have argued that it would now be appropriate to revise this measure to reflect new and emerging social needs. In addition, they suggest that high relative income poverty may result in an increase in consistent poverty in line with rising living standards and expectations (Nolan *et al* [2002], *Monitoring Poverty Trends in Ireland: Results from the 2000 Living in Ireland Survey*, Dublin: ESRI).

women and children in low-income households, people with disabilities and members of other ethnic minorities... individuals and families living in disadvantaged urban areas or in peripheral rural areas. In 2001, unemployed households and ill or disabled households had high risks of poverty. Specific family types also had a higher risk of poverty, namely those comprising two adults and four or more children and those with a single adult and children.

2.2 Indebtedness and public utility charges

Intrinsic in people's experiences of poverty is a cycle of indebtedness and borrowing.⁶ The problem of indebtedness can stem from a number of social problems such as unemployment, relationship breakdown, physical and mental health problems and low educational attainment.⁷ These problems are not exclusive to those in low income or social welfare dependent households but include a wide range of households across the broad income spectrum.

In the recent Combat Poverty study *Against All Odds*,⁸ the extent of borrowing and indebtedness in low-income families is outlined. Focusing on the experiences of 30 low-income families, it found that only two families were debt free, 14 had loans and arrears, a further nine had loans only and the remaining five had arrears only. This illustrates the financial difficulties and constraints that low-income families encounter. Families in the study regularly fell into arrears due to the payment of public utilities. Expenses that are not paid weekly, such as utility services, were the most problematic to pay.

The scale of public utility charges is illustrated in the following figures:

- The average cost of electricity is €75 per month.
- 45 per cent of telephone users indicated that their telephone bill was on average between €66 and €125 bi-monthly. In

⁶ Daly, M. and Walsh, J. (1998), *Moneylending and low-income families*, Dublin: CPA

⁷ For further information see Brady, H. (2002), *Social Inclusion: A MABS Perspective*, Money Advice and Budgeting Service National Conference 08/03/02 at www.mabs.ie

⁸ Daly, M. and Leonard, M. (2003), *Against All Odds*, Dublin: IPA

addition, 41 per cent indicated that there had been an increase in their telephone bill in the last two years.⁹

- The average cost of gas is €580 per year, or €48.33 per month.
- Television licences were increased by 45 per cent in 2003 to €150 per annum.
- Waste collection charges vary between €150 and €500 per annum.

Utility charges impose a major burden on low-income households as they consume a higher share of their total income than for other groups. In addition, increases in the charges represent a higher proportion of their disposable income.

3 Policies relating to waste collection charges

Historically, domestic households were required to pay rates on their property. Following the abolition of rates in 1977 there was a period in which households were not required to pay any charges. In 1983 these charges were re-introduced in a different format in that they were levied on services provided to domestic households. These service charges were primarily related to the provision of services such as sewage facilities, the supply of water and waste disposal. In the mid-1990s, the Department of the Environment introduced a new system of funding for local authorities. Under this system, water charges and sewage facility charges were abolished, while waste collection charges were retained.

In the 1990s, the growth in the amount of waste disposed led to official recognition of a waste management crisis. Central to this crisis was the disposal of household refuse. Under the Waste Management Act 1996, local authorities have a wide range of functions in relation to refuse collection. The Act divides the country into waste management regions. Within each region the relevant local authorities must come together in order to

⁹ MRBI (2003), *Residential Telecommunications Survey – Quarterly Report prepared for COMREG*

establish a regional waste management plan. Primarily it is the responsibility of each local authority to decide who provides the refuse collection service: the local authority itself, a private sector operator or the local authority in association with a private sector operator. Private operators who wish to collect refuse in a local authority area must obtain a permit in order to do so. One local authority in each region awards permits to private operators wishing to collect within its region. Implicit in the provisions of the Act is the 'polluter pays' principle, which originates from an EU directive. The charge is determined at a local level by either the local authority or a private operator.¹⁰

3.1 Means of refuse collection

Across the 34 local authorities¹¹ there are three waste collection systems:

1. Household refuse collection is undertaken by the local authority, with no intervention by private contractors.
2. The local authority contracts the service out to a private contractor, but payment is made by the customer directly to the local authority.
3. Refuse collection is undertaken by private operators and the payment of charges is made by the customer directly to the private company. Local authorities influence the cost through the imposition of charges at their refuse sites.

In most local authorities there is a mixture of public and private collections, which provides more choice and competition in waste collection.

There are different systems of payment across the local authorities and private operators. Primarily they can be divided into two categories:

¹⁰ Council Recommendation 75/436/Euratom, ESC, EEC of 3 March 1975. The charge varies from local authority to local authority depending on collection and disposal costs.

¹¹ For the purpose of this research we have focused on the 29 county councils and 5 city councils. Town councils were not included in the survey undertaken as county councils and city councils set the charge to be imposed for refuse collection.

- A flat rate system based on a set fee for a fixed period, usually one year, and based on a wheelie bin collection.¹²
- A payment per usage system whereby the consumer purchases bags or tags for individual items of waste, referred to as a 'pay-as-you-go' system.

In a number of areas, both methods of payment are offered. In some instances collectors offer different size bins at different rates, so this could be included in the 'payment per usage' category – effectively those who use the bigger bins are disposing of more waste. There are also variations in the methods of payment. For example, those who are charged by the flat rate system can, in some instances, pay in a number of instalments rather than just one payment. Those who avail of the 'pay per usage' system have a more staggered system of payment. The majority of local authorities do not employ a flat rate system. They primarily employ some means of payment per usage system or there may be a reduced rate for a smaller bin. However, there is an increasing tendency to provide dual systems of payment, i.e. a wheelie bin system and a 'pay-as-you-go' system.

3.2 Government supports for waste collection charges

There are two methods of payment reduction available to householders. One is provided at a central government level in the form of a tax relief. The other, provided at a local level by individual local authorities, is a full or partial waiver of the charge. The 1995 Finance Act provides for tax relief for the payment of refuse collection service charges. This was designed to compensate taxpayers for what was seen as 'double taxation', i.e. payment of national taxes and local charges. In order to benefit from this tax relief, customers must pay their service charges in full and on time. They must also have no arrears on previous years' charges. Those paying income tax can avail of this relief at the standard rate. Table 2 illustrates the amount of tax relief claimed for the year 2000/2001.

Table 2: Tax relief for waste collection charges, 2000/2001

Group	Numbers	Cost
PAYE	36,414	€1.147m
Self-employed	7,652	€0.276m
Total	44,065	€1.42m

There were 36,414 PAYE and 7,652 self-employed taxpayers who claimed tax relief on waste collection charges for the tax year 2000/2001, at a cost of €1.42 million to the exchequer (representing allowable claims of about €6.45 million). The tax relief was worth €32 per claimant, based on an average charge of €146.

A waiver¹³ system for those in 'hardship cases' is available from most local authorities. The operation of a waiver scheme is dependent on each local authority; no national guidelines have been set down by the Department of the Environment, Heritage and Local Government. The grounds under which a waiver is granted are decided by individual local authorities.

Tax relief is more transparent than waivers. Legislation in relation to the tax incentive is provided for at a central level whereas the terms of granting a waiver are more ambiguous and only provided at a local level. The tax relief has a wider coverage in that everyone who pays tax can avail of it. Furthermore, it is easier to apply for and, once approved, it is provided automatically in future years. In contrast, the waiver scheme is not an automatic entitlement for low-income households. It is only for those whom the relevant local authority deem to be in need of a waiver. Also the application procedure is more complicated. Local variations in relation to waivers will become more apparent when specific localities are examined later in the report.

¹³ A waiver is essentially when a local authority foregoes the full or partial payment of the refuse service charge. It is primarily given to those in low-income households.

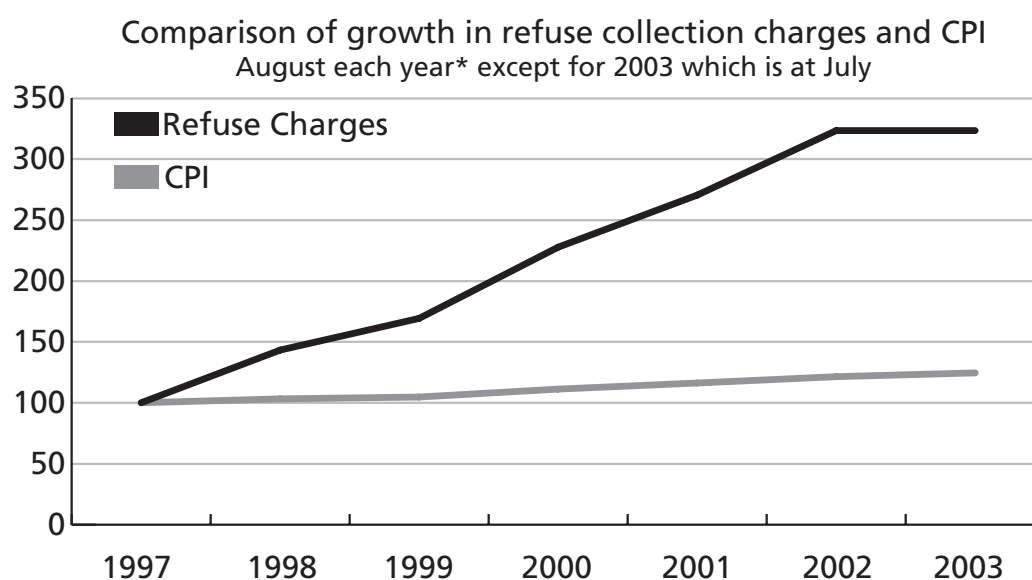
3.3 Trends in waste collection charges

Waste collection charges vary between €150 and €500 per annum depending on local authority area. Charges have increased rapidly in recent years to reflect the greater policy emphasis on the 'polluter pays' principle. The trend in waste collection charges since 1997 is documented in Figure 1, as compared with the Consumer Price Index. Waste collection charges grew by 223 per cent in a six-year period, an average of 37 per cent per annum. By contrast, the rate of inflation in this period was less than 24 per cent. Thus, the growth in waste charges has exceeded inflation by a factor of 9 since 1997. The increase in the cost of other public utilities in this period is as follows:

- electricity: 24 per cent
- telephone: - 21 per cent
- gas: 18 per cent
- TV licence: 69 per cent.

The trend in waste collection charges is therefore far in excess of comparable public services.

Figure 1: Trends in waste collection charges and inflation, 1997-2003



Source: CSO, Monthly and yearly Consumer Price Index (CPI) figures

3.4 Waste collection charges and low-income households

The impact of waste collection charges on low-income households can be attributed in part to the devolved system of waste management. Each local authority makes decisions regarding issues such as whether refuse is collected by the local authority or a private contractor or whether a waiver scheme is in place and the conditions of such a scheme. This leads to a situation whereby there are major variations across the country.

While tax relief on service charges, the waiver scheme and the provision of a discount all appear to assist customers in paying their refuse collection charges, they are not as beneficial to low-income families. Tax relief is only beneficial for those who are in employment and paying income tax. For those relying solely on social welfare payments, this is of no benefit. Those in low-paid employment may not be entitled to tax relief because of their income level. The waiver system is problematic due to the fact that there are no national guidelines in relation to eligibility or level of waiver. Thus, no standard income levels have been set and the award of a waiver is generally decided by each local authority.

On the surface, the 'pay-as-you-go' method of collection appears to be more suitable to those in low-income households than the flat rate system. However, this method can be problematic at certain times of the year. For instance, those in low-income households may have little left over following 'back to school' shopping and therefore are unable to purchase a bag or tag. This could lead to a build up of refuse and further consequences.

The Money Advice and Budgeting Service (MABS) has recently identified refuse collection charges as a primary concern for its clients. The MABS service in the western and north-west regions has highlighted a number of issues that have contributed to the growth in this problem among its clients.¹⁴ Among the issues highlighted is the increased contracting out of waste collection services to private sector operators who are reluctant to provide a waiver system.

¹⁴ MABS in Letterkenny are also examining this issue and hoping to include it in their annual report.

A survey of MABS offices for this study revealed a variation in the significance of the waste collection charges among clients presenting at their service. Some offices experienced very few cases referring directly to refuse collection charges as a cause of debt, while others recorded up to 75 per cent of their clients referring directly to refuse charges as a cause of debt. This variance can be attributed in part to the different systems that are in place across the country. Therefore each area will have experiences of different problems. These variations are now examined in five local authority areas.

4 Operation of waste collection charges

In order to illustrate the variations across local authorities in respect of refuse charges, five local authorities were chosen as case studies: Dún Laoghaire-Rathdown, Kildare, Galway County, Donegal and Dublin City. These local authorities were sampled to reflect geographical location and variation in the models of refuse collection employed. The systems of refuse collection in each of these areas will now be explored in detail.

4.1 Systems of collection

The different waste collection systems in the five counties are outlined in Table 3. Donegal has a contracted-out system of refuse collection. There are several operators working in the area and they provide a mixture of 'pay-as-you-go' systems along with one offering different size bins for a different annual charge. Dún Laoghaire-Rathdown provide their own system of refuse collection. They charge a flat rate for the annual service, regardless of the capacity of the bin supplied to the customer. Wheelie bins are the only system of waste collection in this area. In Dublin City, refuse collection is also provided by the local authority. However, in contrast to Dún Laoghaire-Rathdown, Dublin City provides a dual payment system, i.e. there is a bagging system of collection along with a bin collection service.

Table 3: Systems of collection

Local authority area	Means of collection	System of charging
Donegal	Private sector operators	Flat price for different sizes of bin and 'pay-as-you-go' systems
Dublin City	Local authority provided	Dual system of payment: flat rate or 'pay-as-you-go' system
Dún Laoghaire-Rathdown	Local authority provided	Flat rate system: one bin size
Galway	Private sector operators	Flat price for different bin sizes and 'pay-as-you-go' method
Kildare	Local authority contracted out + private operators	Flat rate system, with two sizes of bin available

Galway County has a contracted-out system of refuse collection. The local authority has permitted six private contractors to collect waste from households. The two main private collectors provide a wheelie bin flat rate system, along with a pay per usage bagging system.

Kildare has a different system to all previous local authorities. In this local authority the system of refuse collection is contracted out to a private operator. There are also other private operators providing their own service. The system here is primarily related to a flat rate payment, but customers can avail of either a 120-litre bin or 240-litre bin, with a higher charge for the larger bin.

These five local authorities reflect the differences in refuse collection across the country. While variations in refuse collection systems create indirect problems, such as a lack of consistency in the systems provided, the difference in charges imposed has more direct implications for low-income households.

4.2 Cost of refuse collection

Table 4 shows the disparity in costs across the five case study areas. A flat rate indicates a universal charge imposed on customers in the area which does not take into account how much refuse the customer disposes of. All figures in the 240-litre bin and 120/140-litre bin columns relate to an annual charge for a weekly collection of the bin. The figures in the 'pay-as-you-go' column represent a charge per individual bag/tag.

Table 4: Cost of refuse collection

	240-litre bin	120/140-litre bin	'Pay-as-you-go'
Donegal	€300 – €325	€200 – €230	€3.00 – €5.50
Dún Laoghaire-Rathdown	€275	N/A	N/A
Dublin*	€154	€90	N/A
Galway	€350 – €375	€275	€4
Kildare	€338	€250.50	N/A

* Dublin City also operates a system for those residing in apartments whereby residents can have access to a communal 1,100-litre bin. The charge for this is €130 per annum.

The highest price is charged in Galway County at a cost of €375 per annum for a 240-litre bin. In contrast to this, Dublin City only charges €154, less than half the price charged in Galway County. In terms of the service provided it is practically the same as that in Galway County. Refuse is collected once a week and there is no extra charge for the provision of the bin. In addition to this, as part of the regional plan developed in the Dublin region, a green bin used for dry recyclables is collected once a month. This service is also provided in Dún Laoghaire-Rathdown. However, while these two local authority areas are located beside each other, there is again a vast difference in the charge imposed, with the cost of refuse collection in Dún Laoghaire-Rathdown being €121 more than in Dublin City.

The charges imposed by private contractors in Donegal are similar to those imposed by the private contractors in Galway. Kildare's refuse collection charge is closely in line with those imposed in Galway and Donegal. This would indicate that contracting out refuse collection to the private sector may result in a higher charge.

4.3 Waiver system

As previously outlined, there are no national guidelines in respect of a waiver for refuse collection charges. The decision to provide a waiver is at the discretion of the individual local authority. The five local authorities are now examined in respect of the waiver scheme available in their area (Table 5).

Dún Laoghaire-Rathdown provides a full waiver primarily on income grounds. Those in employment must submit their P60s in respect of any employment. For those on long-term social welfare it is assumed that this position will continue for the year in question. Those on short-term social welfare payments are advised to firstly pay the refuse collection fees and then submit their application for a refund at the end of the year. Those in single person households are entitled to the waiver if they earn less than €172 with an increase in the limit of €22 per dependent child. Households with two adults are entitled to the waiver if they earn less than €328, again with an increase in the limit of €22 per dependent child. There is a hardship clause within the waiver scheme which provides for those in substantial financial difficulty.

Dublin City also provides a waiver. Households in receipt of income that is exempt from tax and those whose sole income is from the Department of Social and Family Affairs are awarded a full waiver. There is also a discretionary option for 'hardship cases'.

Table 5: Waiver provision and conditions

Local Authority	Waiver	Income limit	Eligible groups	Other discretion
Donegal	No direct waiver provided	N/A	Some OAPs* Lone parents	Some operators provide a smaller bin to some customers, with fortnightly collection for reduced price
Dún Laoghaire-Rathdown	Yes	Single person household – €172 Two adult household – €328 (increased by €22 per dependent child)	Hardship cases Long-term social welfare recipients	Short-term social welfare recipients may be given a refund at year end
Dublin	Yes	Income that is exempt from tax	Sole income from Department of Social and Family Affairs	Hardship cases
Galway	No direct waiver provided	N/A	N/A	N/A
Kildare	Yes	Partial waiver – €253.95 Full waiver – €342.83 (increase of €19.30 per dependent child)	OAPs with income from social welfare pensions only Social welfare recipients on invalidity pension, lone parent's allowance	N/A

* OAPs are Old Age Pensioners

Kildare County Council provides a waiver scheme for those on a low income and for designated groups such as recipients of an old age pension. Households in receipt of social welfare payments such as invalidity pension and lone parent's allowance are eligible for a waiver if their income is less than €253.95 (full waiver) or €342.83 (half waiver). In this scheme, the income limits increase by €19.30 for each dependent child. This is less than what is allowed by Dún Laoghaire-Rathdown County Council. The income limits are also inconsistent with those in Dún Laoghaire-Rathdown.

In Galway County there is no waiver scheme due to the privatised nature of the waste collection service. One operator stated that he had asked Galway County Council to refund the cost of providing a waiver for low-income households, but this was not granted.

In Donegal, there is occasional use of a waiver. In most instances, a waiver is received through an informal agreement between the operator and the customer, mainly old age pensioners or single parents. None of the companies sets income limits below which waivers will be granted. They provide a number of methods for easing the payment of charges such as a smaller bin to customers or a pay-per-use system. However, these cannot be classified as waivers since the customer is still paying a charge related to the waste disposed of.

5 Conclusions and recommendations

This report examined the impact of waste collection charges on low-income households drawing on existing information sources, supplemented by a micro-survey of five local authorities. The backdrop to the study was the significant proportion of the population at risk of poverty, with a fifth below 60 per cent of average income, while 5 per cent experience both low income and deprivation of basic

necessities. For these households, the cost of waste collection charges and other public utilities can be a major financial burden, often associated with an increased risk of indebtedness.

The report reviewed government and local policy underpinning waste collection charges. Nationally, the polluter pays principle is now the driving force behind waste collection charges. At the local level, city and county councils offer various waste collection options, with a mix of public and private operators providing both pay-as-you-go and flat rate services. A dual system for compensating households with the cost of waste collection charges exists, with universal support for income tax payers at national level contrasting with a discretionary system of waivers implemented by local authorities.

The report noted the escalating cost of waste collection charges in recent years, now averaging between €150 and €500 per annum. One indicator of the effect on low-income households is the increased numbers of clients presenting at money advice services with financial problems directly associated with waste charges. Even with pay-as-you-go charges, there are reports of financial pressure, especially when associated with other high expenditure periods such as returning to school.

The variable practice and cost of waste collection were illustrated through a micro-study of five local authorities. This revealed major variations in the systems of collection, the level of waste charges and the provision of waivers. Consequently, the impact of waste collection charges on low-income households was primarily influenced by location of residence, rather than the amount of waste produced, household composition or payment system.

In terms of charting a way forward, waste management policy should be influenced by both environmental and social concerns. Waste collection charges exclusively based on the 'polluter pays' principle are inevitably regressive, posing a major burden for low-income households, especially those with

children and other dependants. While local adjustments can moderate the effect of waste charges, they are not a substitute for a national policy response. Central government subvention is directed at better-off income tax payers rather than welfare recipients and other low-income households. As a result of this national policy vacuum, low-income households are vulnerable to financial variability depending on where they live, rather than social need or amount of waste produced.

In light of these inconsistencies in the policy and practice of waste collection from a poverty perspective, Combat Poverty recommends the following:

- 1 A national waiver scheme for waste collection charges should be introduced. This waiver should be administered by the relevant local authority and should be available from all refuse collection operators.
- 2 Guidelines for a national waiver scheme¹⁵ should be drawn up by the Department of the Environment, Heritage and Local Government in consultation with MABS, Combat Poverty, the community and voluntary sector representatives and the Department of Social and Family Affairs. These guidelines should cover the following issues:
 - Eligibility for a waiver
 - Proportion of discount to be applied
 - Application procedure
 - Decision-making and appeals process
 - Promotion and information dissemination
- 3 Payment mechanisms that are more appropriate to the budgeting patterns of low-income households should be made available. One option would be for local authorities to incorporate the cost of refuse into the rent payable each week by their tenants. The payment of waste charges could also be included along with rent in the Household Budget Scheme.

¹⁵ Combat Poverty is currently drawing up policy and practice guidelines on waivers for service charges operated by local authorities, as part of its Local Government Anti-Poverty Programme.

- 4 MABS and the Citizens' Information Centres should promote awareness of a national waiver scheme at the local level. These organisations could also review and monitor the implementation of the scheme.
- 5 Recycling facilities for those in low-income households should be enhanced, especially with the advent of a pay-by-weight system of refuse collection. These facilities should be accessible and well maintained. The availability of bring banks in the larger local authority housing estates is recommended, along with door-to-door recycling collection facilities in rural areas. The provision of these facilities should be the responsibility of the local authority.