



Leo Duffy
Programme Manager
NWCPO
Offaly County Council
Áras An Chontae
Charleville Road
Tullamore
County Offaly

20th December 2014

Re: Consultation on Waste Collection Permit Conditions

Dear Leo,

Further to your email request for submissions, dated 26th November 2014, relating to your review of waste collection permit conditions, the Irish Waste Management Association (IWMA) offers the following comments for your consideration.

Condition 2.6

This Condition is very cumbersome as appendices are updated very regularly in many cases and changing the paper permits in a large fleet of vehicles on a regular basis is an unnecessary regulatory burden on the resources of a company. The IWMA accepts the need to carry the waste permit in paper or electronic form in every vehicle, but there should not be a requirement to carry an update of all appendices.

We also suggest that emergency response procedures should be easily accessible to drivers and helpers in vehicles, in either paper form or electronic format.

Condition 2.11

We suggest that drivers and helpers should be appropriately trained for the tasks that they are required to carry out. This can be internal or external training and should be recorded, but the training programme should not be specified as this can lead to a monopoly in training provision.

Condition 2.14

We suggest that permit number and company name should suffice here.

Condition 3.1

We suggest that if a company uses an unlisted refuse collection vehicle that does not have on-board weighing system to collect household waste, the vehicle should be impounded.

There are occasions when waste companies lease vehicles from hauliers that have their own permits or borrow vehicles from another waste company. This can lead to a vehicle being included on two permits simultaneously, through no fault of either party. We ask that you consider a simple process to temporarily transfer vehicles between permits, so that they are only included on one permit at all times.

Condition 3.2

We suggest that the permit holder should also declare if the vehicle is multi-compartmental.

Condition 3.3

We suggest that the timeframe of one day to notify the NWCPO of a leased vehicle and to provide the relevant documentation is very short. We ask that this is extended to 5 days for the submission of the relevant documentation.

Condition 3.10

This condition relating to a written agreement should allow the use of paperless technologies such as handheld electronic systems that can be signed by the customer.

Condition 3.12

The 3 day turnaround for skips is considered too short and a longer period would be welcomed.

Condition 3.15

From experience gained by our members, the part of the condition referring to provision of names and addresses of customers may require the proviso "*subject to compliance with data protection laws*", unless the new regulations overcome this issue.

Also, the address of the permit holder may be unnecessary here, as the name and phone number should suffice. Larger companies often have a number of addresses.

Condition 4.3 XIII

This clause requires the signature of a representative of the authorised waste facility. In our member's experience, it is not realistic to expect every transaction to be signed, so we suggest that it should suffice to have a specific ID number relating to each transaction.

Condition 4.3

We suggest that this requirement is outdated. Many companies no longer use a docket system and use a handheld device with electronic information, so we suggest that the Condition recognises such changes in technology.

Condition 5.1

The IWMA has difficulty with this clause and would like it removed as it is both open ended and open to abuse. Furthermore, it provides for an unacceptable level of uncertainty as to cost. The cost of enforcement should be covered in the permit fee or from other funding such as the environment fund. If a company is found guilty of an offence the enforcement authorities can seek costs from the court.

Condition 6.1.3 and Condition 6.6.2

These conditions should refer to Food Waste Regulations (household and commercial) rather than to bye-laws.

Condition 6.6.3

The reference to bye-laws appears out of place here. Source segregated wastes should not be mixed during or after collection in any circumstances.

Condition 6.6.4

The new pay by system will require revision of this condition. It is important that the NWCPO is fully satisfied that each company is fully compliant with the new pay by weight charging system before a revised permit is issued for household waste collection (kerbside, PTU and CA sites).

Condition 6.6.5

Kerbside collection services can be impacted by adverse weather and 10 days notice of such service reductions would not be possible. We suggest that a specific allowance is made for adverse weather conditions.

Condition 6.6.7

This condition should be appropriately revised after the DECLG-led awareness campaign is fully developed and agreed with the IWMA.

Condition 6.6.8 and Condition 3.8

We understand that bag collections will not be allowed for household waste collection, so these conditions may be limited to commercial waste.

Condition 7

We suggest that all regional conditions should be removed altogether in favour of National conditions. The draft Regional Waste Management Plans are very consistent with each other and we can see no reason for regional conditions. Local issues are generally addressed in bye-laws.

Appendices B and C

We suggest that these appendices are important controls and should be retained and easily accessible to enforcement staff, but not necessarily available in the collection vehicles.

I hope the above suggestions are helpful and we are available to further discuss this matter at your convenience, should you require clarifications or further discussions.

Yours Sincerely,

A handwritten signature in blue ink that reads "Conor Walsh". The signature is written in a cursive, flowing style.

Conor Walsh

IWMA Secretary
7 Dundrum Business Park,
Windy Arbour
Dublin 14

Email. cwalsh@slrconsulting.com

Tel. 01-2964667