



Leo Duffy
National Waste Collection Permit Office
Offaly County Council
Ara An Chontae
Charleville Road
Tullamore
Co. Offaly

21st July 2016

Re: DRAFT WASTE COLLECTION PERMITS

Dear Leo,

Further to your request for feedback, the IWMA makes the following submission on the latest draft generic waste collection permit, which you issued in a file that is dated 18th July 2016.

Condition 2.13 – We previously pushed back on the requirement for each vehicle to carry an up to date Appendix C with all the company's permitted vehicles listed. This is very difficult in paper form as Appendix C changes all the time and a large company may have more than 100 vehicles in a fleet.

We agreed that this can be achieved by electronic means using smartphones or other electronic devices. However, it has been pointed out this week that many of our members' vehicles do not carry such electronic devices.

It would be more practical and more appropriate for the enforcement officers to be issued with smartphones that could be used to check the relevant Appendix C on a central database, such as the NWCPO website or even to make a phonecall to the NWCPO to check the details of Appendix C.

As this condition currently stands, it could result in a company being hit with many offences in a single day where a hired vehicle or a new vehicle is added to Appendix C. This could lead to serious consequences for the company, including an automatic review of the waste collection permit, but the scenario envisaged poses no risk to the environment. It could result in unnecessarily criminalising good operators.

In light of the serious implications in terms of enforcement, we ask that the requirement for up to date Appendices to be available in each vehicle to be removed.

Condition 3.5 – We recognise the change to Condition 3.5 to allow the name or collection permit number rather than both. The issue of a unique identification number has also been

raised and it has been pointed out that there are thousands of skips and skip bags in stock that do not have such unique identification numbers. We therefore ask that you remove part (b) of this condition as it is not practical.

Yours Sincerely,

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

Conor Walsh
IWMA Secretary

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