

On 14th February comments/observations were requested from the Steering Group on CCPC's Irish Household Waste Collection Market Survey, the closing dates provided for comments was 23rd Feb (WERLA) and 2nd March (CCPC). To allow a considered response a 6 weeks' consultation period could have been afforded. We have concerns many members may not have responded with relevant comments, due to the short timeline afforded; we regret our late response as follow:

Public Consultation Response

Competition

2.1 (a) Yes, there is an urban-rural divide, in rural areas there is less competition among collectors. There is a need for Man in a Van operation in smaller towns and villages, especially for our ageing population with many living alone. In rural areas there is also less disposal options, waste transfer hubs and CAS's located within a practical range of dwellings.

2.1 (c & e) Yes, collectors seem to have divided up areas among themselves in many rural areas, thus removing potential competition.

2.1 (d) Suggest a tender process for areas with no competition. Also look at separate authorisation for Man in the Van operations v's WCP.

Operational Barriers to Entry

2.2 (a, b, c) In the midlands area there is a lack of disposal options at present. We believe a Midlands Regional Waste Transfer Hub strategically located adjacent to a landfill and/or Pyrolysis/incinerator plant would provide disposal and resource options. A hub at Derryclure Landfill Facility adjacent to the M6 & M7 would open operational barriers to the midlands and west creating a competitive sustainable market.

Market Coverage

2.3 We agree with the 77% estimate and belief rural areas would utilise CAS more for recyclables, if there was greater availability. Kerbside collection works for family units

(≥3) but it's too costly for dwellings with one or two occupants. Our increasing elderly population prefer Man in the Van operations rather than wheeling in and out a 240 litre bin.

Landfill & Incinerator Capacity

2.5 WERLA have provided concrete evidence there is a lack landfill capacity national, we wish to reiterate this concern especially for the midlands and western regions.

Regulatory Environment

2.7 (e) We are concerned if we enforce the use of brown bins could we be held responsible in any way for aiding the spread of invasive species.

If you have any queries, please don't hesitate to call.

Sincerely,

Philip Glover
A/Senior Executive Engineer