

18 MAY 2022



Dennis Eagle Ltd.
Heathcote Way, Heathcote Ind. Estate
Warwick, Warwickshire, CV34 6TE
United Kingdom




MEMBER OF THE ROYAL TERBERG GROUP

Mr Nigel Parsley
Senior Coroner for Suffolk
The Suffolk Coroner's Service
Head Office and Court
Beacon House
White House Road
Ipswich
IP1 5PB

16/05/2022

Dear Mr Parsley

REGULATION 28 REPORT TO PREVENT FUTURE DEATHS response

The Directors of Dennis Eagle Ltd. would like to extend our condolences to the family of Corrie McKeague.

Please see below our response to the CORONER'S MATTERS OF CONCERN item number 4. within the REGULATION 28 REPORT TO PREVENT FUTURE DEATHS issued 1st April 2022:

4. Poor visibility through the Perspex viewing window on the lorry.

Purpose / Design intent of the side 'window' in Dennis Eagle refuse machines

All refuse collection bodies produced by Dennis Eagle Ltd are designed to comply with the European Safety standard BS EN 1501 (Refuse Collection Vehicles – General Requirements and Safety Requirements). This standard does not currently contain a requirement for side windows or camera's etc to enable viewing inside the tailgate for this configuration of machine.

The side windows fitted to the OLYMPUS tailgate have been added to allow operator vision when required, of the discharge of the container contents relative to the compaction mechanism i.e. the point at which container/ mechanism physically approach one another. The window has therefore been positioned to facilitate viewing of this operation, i.e. at eye line and/or above.

This window is not an absolute requirement for the operation of the machine but has operator benefits in some scenarios and/or situations. For example, when larger containers (1100 lts and above) are discharged, situations can occasionally occur when the container contents and/or the container need to be monitored through the discharge cycle to 'aid' clean transfer into the tailgate. This can be required due to issues with container, container lid condition/position, container contents, how full the container is, etc.

Opacity of window

Due to the position of this viewing aperture, it cannot be an open feature as occasionally debris, dust, liquids etc., can be dispersed because of the compaction process. The window is therefore made from

polycarbonate to resist typical impact scenarios. Over time mechanical scratches, the effect from UV light etc. will build up affecting its transparency. The window is therefore a serviceable part which can be replaced as necessary.

Positioning of window

The minimum height/ size of the viewing window is determined by the kinematics of the compaction mechanism and discharge trajectory of refuse from containers of many types and sizes i.e. its positioned above areas potentially subject to wear and likely impact.

Operating instructions

We do not have access to Biffa's Operating Instructions to make specific comments.

Automatic compaction

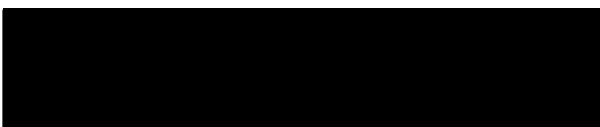
Today's RCV's including the OLYMPUS have evolved to support high efficiency collecting systems usually utilising automatic twin lifters (lifting smaller, typically 240ltr containers) and auto cycle start packing mechanism operation. Auto packing cycle start is a significant benefit to the operators in these instances. As multiple smaller containers are loaded in an ongoing random way into the tailgate the auto packing mechanism start function helps to prevent the tailgate from becoming overloaded and removes the need for frequent operator intervention to achieve the same.

When lifting larger containers or where refuse tends more towards what may be described as 'trade' waste i.e. a little more unpredictable in content, it is possible to select manual compaction from the bin lift control station. With manual compaction selected the compaction mechanism will only start by the operator pushing the compaction start button on side control station i.e. it will not start automatically when the bin lift is operated.

Overall summary

The viewing window, as designed, is to aid in the container discharge operation of the machine and not to enable the viewing of the floor of the tailgate after the refuse has been discharged.

Your sincerely


Company Secretary