

Waste Action Plan Consultation
Waste Policy & Resource Efficiency
Department of Communications, Climate Action & Environment
Newtown Road
Wexford
Y35 AP90

A Chara,

Please see below Ballynagran Landfill's response to the Department of Communications, Climate Action & Environments request for submissions in relation to the public consultation on Waste Action Plan for a Circular Economy. Responses have been made by Chapter headings as per the consultation document.

2. Institutional Arrangements

The Environmental Protection Agency (EPA) must have statutory timelines prescribed in legislation for determining waste/industrial emission licences. The lack of statutory timelines is hindering the ability of industry to plan and invest in new waste management infrastructure.

The 10 week timeline for assessing Article 27 notifications to the EPA is too long. It prevents best use being made of a valuable raw material.

3. Municipal (Household and Commercial) Waste

The proposal of mandatory organic waste bins to all houses will increase the prices for customers in rural areas. Refocused effort to increase the use of the organic waste bin in populated areas (>500) and to reduce the contamination rate in it should be done prior to mandatory roll out in rural areas.

9. Construction & Demolition Waste

The Article 27 Process developed by the EPA for declaration of materials as By-Products is not working properly. It needs to be resourced better by the EPA or reviewed to streamline the process.

End of Waste criteria need to be developed urgently for many C&D waste streams including concrete, soil/stone, wood etc.

Source segregation of all waste streams on building sites should be enforced by the local authorities' i.e. gypsum/plasterboard, concrete, soil/stone, wood etc.

The Recovery of Construction & Demolition (C&D) Waste at landfills will have to continue to play a significant role in the management of this waste stream until such time as source segregation is implemented to reduce separation/processing costs.

Landfills will always require some C&D materials for recovery. C&D materials are used in landfills for road building, daily cover and capping. If the sources of C&D materials for these essential landfill uses disappear completely clean virgin products may have to be used which is completely at odds with what the Circular Economy is trying to achieve.

11. Waste Management Infrastructure

The Planning and IED/Waste licencing processes should be amended to encourage the co-location of more waste management infrastructure on existing sites. The IED/Waste licence review process is too slow to allow the industry to react to the needs of the market.

In relation to the point raised in 11.6 of the consultation document:

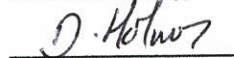
“Legislation to strengthen the powers of the regulatory authorities to ensure that collectors have contingent capacity in place and that waste can be directed by the regulatory authorities to be introduced.”

While Ballynagran is not a waste collector it can nonetheless play a significant part in providing contingent capacity. Landfill is best placed to provide emergency contingency capacity. We believe that this can be achieved under existing legislation by technical amendment of the existing landfill licences by the EPA; with the condition that the contingency capacity can only be activated by the DCCAE/RWMPO.

21. Household Bulky Waste

A national plan for the management of household bulky waste needs to be developed in order to remove such items from the general waste stream e.g. reuse, recycling and processing.

Yours Sincerely,



Damien Holmes
General Manager
Ballynagran Landfill