

Environmental  
Protection Agency  
04 DEC 2008

4<sup>th</sup> December 2008.

**Dr. Jonathan Derham,  
EPA Headquarters,  
PO Box 3000,  
Johnstown Castle Estate,  
County Wexford.**

**Re: Proposed Decision to grant a Waste Licence (W0201-02) to Bord na Mona Plc at  
Drehid Waste Management Facility, Co. Kildare.**

**Dear Sir,**

On behalf of North Tipperary County Council, I wish to object to the Proposed Decision by the Environmental Protection Agency to grant a Waste Licence to Bord na Mona for a Waste Licence to accept 360,000 tonnes of municipal, commercial and industrial wastes at their landfill at Drehid, County Kildare.

A cornerstone of EU and National waste management policy is the Proximity Principle i.e. that waste should be managed (i.e. treated and/or disposed of) as close as possible to where it was generated. This reduces time, energy, the possibility of accident and the expense of long distance transport (which can greatly increase the carbon footprint of the waste activity). The proposed decision to increase the capacity of this landfill from 120,000 tonnes to 360,000 tonnes is in breach of the proximity principle as the new capacity can only be achieved by importing waste to it from outside the Kildare Waste Management Region.

In the Midlands Waste Management Region, of which North Tipperary is a member, there are currently four active landfills, including one at Ballaghvenny, Ballymackey, Co. Tipperary. The waste generated in the Region can be adequately disposed of within the Region with the existing landfill infrastructure, however, increasingly, waste that is generated in the Region is being transported outside the Region by Waste Collectors in order to avail of cheaper landfill gate fees being offered by the private sector. The only beneficiary of this Proposed Decision, if made, will be the private sector who will use and operate the facility.

If this proposed decision is made, then this will further encourage the export of waste outside of North Tipperary and the Midlands Region to Kildare which will be in further breach of the Proximity Principle.

Yours sincerely,

**Karl Cashen,  
Director of Services,  
North Tipperary County Council.**

Consent of EPA required for any other use.