

Submission

Submitter:	Mr Enda Hoey
Organisation Name:	Fingal County Council
Submission Title:	Metal Traceability and High Value Waste Streams
Submission Reference No.:	S009991
Submission Received:	19 May 2021

Application

Applicant:	Blancomet Recycling Ie Limited
Reg. No.:	P1115-01

See below for Submission details.

Attachments are displayed on the following page(s).

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Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Dublin

19th May, 2021

Re: Industrial Emission License Application by Blancomet Recycling Ie Limited

Dear Sir/Madam,

Fingal County Council (Waste Enforcement & Regulation Section) would like to make a submission in relation to an Industrial Emission license application by Blancomet Recycling Ie Limited for their facility at Unit 5 Rosemount Park Drive, Rosemount Business Park, Dublin 15, D11 FVH2.

In order to improve the traceability of waste received at Authorised Treatment Facilities (ATFs') and metal recycling facilities such as Blancomet Recycling Ie Ltd and to counter the trade in stolen metal, S.I. 320 of 2014, Waste Management (Facility Permit and Registration) (Amendment) Regulations 2014 imposed the following additional conditions on all permitted facilities purchasing waste –

- the production of proof of identity (including photo ID) and current address of the person supplying the material,
- record of the name, identity, registration number and where appropriate, waste collection permit number of the delivery vehicle,
- record of the description and weight of the materials, time and date of sale and amount paid;
- signed statement by the person supplying the material that they are the lawful owner of the material or have the consent of the lawful owner to sell the material.

In order to ensure full compliance with facility permit conditions and to protect the environment and human health, ATFs and metal recycling facilities must comply with all conditions aimed at ensuring full traceability of any waste purchased.

End of Life Vehicles (ELVs') and their components can have a significant monetary value (catalytic converters, lead acid batteries). This value can encourage the illegal dismantling of ELV's in the community which can result in serious environmental pollution. ATF's and metal recycling facilities which are authorised by the Local Authority or the EPA can potentially facilitate this illegal activity by accepting high value waste streams arising from unauthorised facilities or criminal activity. These high value waste streams enter the ATF's or metal recycling facilities under the guise of 'general public' and are subsequently processed. This activity can

undermine compliant operators and foster the growth of illegal dismantling and the theft of high value car components such as catalytic converters.

To further strengthen compliance within the Sector and to provide full traceability for all waste purchased at an AFT or metal recycling facility additional permit conditions are being introduced by Local Authorities on new/review permit applications to help tackle metal theft as follows:

Condition X.W

There shall be no casual access to the facility by members of the general public for the collection or delivery of materials. Acceptance of waste shall be limited to waste collection permit holders and/or businesses exempted from the requirement to hold a waste collection permit.

Condition X.X

Where a customer is exempt from the requirement to hold a waste collection permit, details of the nature of the business to which the transport of the waste is incidental, a company registration or VAT number and details/proof of why the exemption applies under Article 30 of S.I No 820/2007 the Waste Management (Collection Permit) Regulations 2007 will be required. In this respect an electronic register of customers exempt from requiring to hold a waste collection permit shall be kept on site.

Condition X.Y

To ensure full traceability of all waste purchased at the facility and in compliance with S.I No.320/2014, Waste Management (Facility Permit and Registration) (Amendment) Regulations 2014:

- a) The permit holder shall require the production of proof of identity of the person supplying the material, such proof being:
 - (i) A valid passport, or
 - (ii) A current Irish driving licence, or learner driver permit, or,
 - (iii) A Public Services Card issued by the Department of Social Protection.
- b) The permit holder shall require the production of proof of current address of the person supplying the material, such proof being:
 - (i) *A current utility bill addressed to that person at that stated address;*
 - (ii) *A document issued by the Government Department addressed to that person at their stated address within the previous three months;*
 - (iii) *A current car or home insurance policy addressed to that person at their stated address; or*
 - (iv) *A current Tax Credit Certificate or Tax Clearance Certificate issued by the Office of the Revenue Commissioners to that person at their stated address;*
- c) *The permit holder shall require a signed statement by the person supplying the material that they are the lawful owner of the material or have the consent of the lawful owner to sell the material.*

d) *The permit holder shall record:*

- i) *The name and proof of identity of the person supplying the material, proof of current address, the vehicle registration number and where appropriate, waste collection permit number of the delivery vehicle,*
- ii) *A description and weight of the materials, time and date of purchase, and amount paid*
- iii) *The permit holder shall maintain a register of all details required to be recorded under Condition X.Y*

I would respectfully request that these conditions are considered as part of the licence application process and incorporated into the Industrial Emission License for Blancomet Recycling Ie Ltd and indeed other metal recycling facilities licensed by the EPA in order to strengthen compliance within the metal recycling sector. By including these conditions in a permit/license it will act as a deterrent to the illegal dismantling of ELV's and the theft of high value car components by ensuring full traceability and removing an outlet for these high value waste streams which are brought in under the guise of "general public and paid for cash in hand."

If you have any further queries, please don't hesitate to contact the Waste Enforcement & Regulation Unit.

Kind Regards



Enda Hoey
Senior Executive Scientist
Waste Enforcement & Regulation

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