

Submission

Submitter:	Mr Brian White
Organisation Name:	NTFSO
Submission Title:	Blancomet
Submission Reference No.:	S010057
Submission Received:	30 June 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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National Trans-frontier Shipment Office
Dublin City Council
Block B Floor 2 Blackhall Walk
Smithfield
Dublin 7
28th May 2021

Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency

Re: License Application by Blancomet Recycling Ltd.

Dear Sir/Madam

The NTFSO would like to make a submission on the above application by the above applicant for their premises at Unit 5 Rosemount Park Drive, Rosemount Business Park, Dublin 15.

The NTFSO are concerned about the proliferation of catalytic convertors being traded without traceability throughout the country. Illegal trade in catalytic convertors has led to several meetings with other state enforcement agencies and competent authorities in the UK.

In order to improve traceability of catalytic convertors and further strengthen compliance, the NTFSO would encourage extra conditions in the licence to assist this process. We therefore request that the EPA give consideration to the following comments.

Prohibit casual access to the facility by members of the general public for the collection or delivery of materials and to only accept waste from those in possession of a valid waste collection permit and/or business exempted from the requirement to hold a waste collection

The facility be obliged to obtain company details (e.g. company registration number or VAT number) for all transactions together with name, address of the person supplying the material, proof of identity and address by way of valid passport or driving licence and that a signed statement of the person supplying the material be obtained stating that that person is the lawful owner of the material. All records to be maintained for inspection by state enforcement agencies for the relevant time period.

We believe that consideration of the above and inclusion within the licence would assist with better traceability and lessen the options for illegal trade in waste metal.

Yours Sincerely



Brian White
Manager, NTFSO
Senior Executive Officer, Dublin City Council