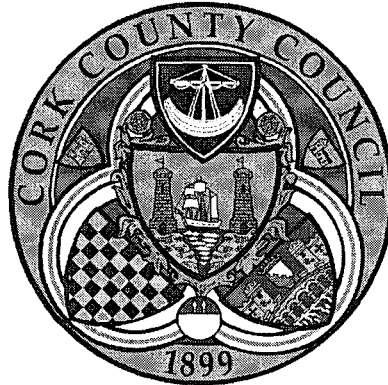


W0068-03
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Comhairle Contae Chorcaí

submission in relation to

**Waste Licence
Recommended Decision
Landfill for Non-Hazardous Waste**

Waste Licence
Register Number: W0068-03
Licensee: Cork County Council
Location of Facility: Youghal Landfill, Youghal Mudlands,
Youghal, Co. Cork.

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1.0 Background

On 18th June 2009 the Environmental Protection Agency (EPA) initiated a review of the licence pertaining to Youghal Landfill (Waste Licence Register No. W0068-02). The inspector's report compiled by Ms. Caroline Murphy (31st August 2009) outlines 5 reasons for initiating the review, the following 3 of which are referred to in this submission:

- Section 46(2)(b) of the Waste Management Acts, 1996 to 2008, requires that the EPA review a waste licence if "*new requirements (whether in the form of standards or otherwise) are prescribed, by or under any enactment or Community act, being requirements that relate to the conduct or control of the activity to which the waste licence relates*". In this case, there is a need to further elaborate and give effect to Articles 5 and 6 of Council Directive 1999/31/EC on the landfill of waste (the Landfill Directive) regarding the treatment of waste prior to landfill and diversion of biodegradable municipal waste from landfill.
- There is also a need to give effect to Article 49(5) of the *Waste Management (Licensing) Regulations 2004* which states that waste that has not been subject to treatment shall not be accepted or disposed of in a landfill facility.
- There is also a need to further the general Best Available Techniques (BAT) obligation to reduce the overall environmental impact of landfill. In this context, there are newly elaborated limits on the acceptance of biodegradable municipal waste at landfill (expressed in the document *Municipal Solid Waste – Pre-treatment and Residuals Management: An EPA Technical Guidance Document* published 19 June 2009) that have regard to the need to implement and achieve landfill diversion targets set out in the Landfill Directive. The diversion of biodegradable municipal waste will, *inter alia*, reduce landfill gas production and have consequent benefits regarding greenhouse gas emissions and the potential for odour nuisance.

The submission also addresses the recommended imposition of the following limits on the amount of biodegradable municipal waste that can be accepted at Youghal Landfill (Condition 5.2.8 of W0068-03):

- From 1st January 2010, only 40% of municipal waste accepted for landfilling can be biodegradable.
- From 1st January 2013, only 24% of municipal waste accepted for landfilling can be biodegradable.
- From 1st January 2016, only 15% of municipal waste accepted for landfilling can be biodegradable.

In addition it presents Cork County Council's concerns relating to a further 4 licence conditions, namely Condition 5.2.10, Condition 5.2.14, Condition 7.6.3 and Condition 7.7.1 and these are discussed in Section 5.0.

2.0 Waste Management Strategy for the Cork Region

Cognisant of the implications of the Landfill Directive, which was in draft form at that time, Cork County Council, in conjunction with Cork City Council, developed a *Waste Management Strategy for Cork Region (1995)* with the objective of reducing the volume of waste, including biodegradable waste, going to landfill in the Cork Region. Scenario 2 of this strategy outlined the measures to be undertaken to achieve these strategic goals and these measures have been progressed in the intervening period, initially in the *Waste Management Plan for Cork County (1999)* and more recently in the *Waste Management Plan for Cork County (2004)*. Both plans were consistent with the strategy document and set out to address the on-going challenge of waste management in Cork County Council's functional area. Scenario 2 proposed that the quantity of waste, and more specifically the quantity of biodegradable waste, to be disposed of at landfill would be reduced by recycling and pre-treatment of waste. In summary Scenario 2 promoted:

- Separate collection and recycling of domestic and commercial waste;
- Home composting;
- Mechanical separation and baling of mixed residual waste collected;
- Composting or digestion of wet organic fraction from mechanical treatment, and
- Landfill of residual waste.

A review of the *Waste Management Plan for Cork County (2004)* was completed in May 2009 and subsequently approved by the Deputy County Manager Mr. Tim Lucey. This review concluded, *inter alia*, that the *Waste Management Plan for Cork County (2004)* as predicated on Scenario 2 of the *Waste Management Strategy for Cork Region (1995)* will see the Region fulfil its obligations with respect to the 2010 biodegradable municipal waste (BMW) diversion target specified in the *Landfill Directive (1999/31/EC)* and could potentially exceed this target by over 40,000t (Appendix A). The target for the Region was calculated by *RPS Consulting Engineers* based on the Region's contribution to the total BMW landfilled¹ nationally in 1995 (Figure 1), an approach that is consistent with the **Principle of Subsidiarity** as advocated by the EU. *RPS Consulting Engineers* were appointed by Cork County Council to provide professional project management and full design team services for the proposed Materials Recovery Facility (MRF) – incorporating Mechanical Biological Treatment (MBT). They have also been appointed to procure an Interim Waste Processing Service Contract (Section 3.0).

¹ It should be noted that Article 5 (2) of the Landfill Directive (1999/31/EC) states that “*biodegradable waste going to landfill must be reduced toof the total amount (by weight)....**produced** in 1995*”. Therefore as the analysis undertaken by *RPS Consulting Engineers* for Cork County Council related to municipal solid waste (MSW) landfilled rather than produced in 1995 the target outlined in Figure 1 above is regarded as conservative.

Figure 1 Extract from Interim Report produced by *RPS Consulting Engineers* for Cork County Council.

FUTURE BIODEGRADABLE WASTE MANAGEMENT IN THE CORK REGION

In order to assess the contribution of the proposed facility to the Landfill Diversion Targets, it was necessary to predict future BMW arisings and examine the impact of the implementation of proposed national and regional policy.

The biodegradable content of MSW in 2007/2008 was calculated using waste compositional information and is estimated to be 77.5%. This is an increase from 68% in 1995 but is in line with the biodegradable content of 73% presented in the EPA National Waste Report 2007.

For the purposes of calculating a Landfill Directive Target for this report, and hence the amount of BMW allowed to be disposed of to landfill by the Cork Region, the BMW content was derived from the EPA 2001 National Waste Database total 1995 MSW arisings figure for Ireland (1,848,232) and the 1995 National BMW content from the DOEHLG (1,289,911) thereby giving a BMW content of 69.8%. It must be noted this calculation is in line with the UK calculation method.

The BMW content calculated was applied to this figure resulting in the baseline BMW figure to be used to calculate target diversion rates of 25%, 50% and 65% respectively.

		Ireland	Cork
1995	Total Waste Arisings	1,848,232	267,371
	(Baseline BMW generation)	1,289,911	186,603
Year	Target	BMW tonnes allowed in landfill	
2010	75%	967,433	139,952
2015	50%	644,956	93,301
2016	35%	451,463	65,311

The UK calculation method referred to in the extract was used by DEFRA (<http://www.defra.gov.uk/Environment/wsate/localauth/lats/intro.htm>) to calculate the landfill allowance trading scheme (LATS) established to enable the UK to comply with its diversion targets. Landfill allowances were apportioned to each waste disposal authority using their relative share for disposal in 1995 as the base years (1 allowance = 1 tonne BMW).

The review also concluded that the Region is in a strong position to address the issues raised in the *National Strategy on Biodegradable Waste (2006)* and associated circular letter. In addition, due to the pro-active approach adopted by the council in terms of reducing the waste disposed of to landfill (Section 3.0) the infrastructure has either been developed or is in the process of being developed such that the Region is well placed to meet its obligations under the Landfill Directive.

3.0 Waste Diversion Initiatives

The *Review of Waste Management Plan for Cork County (2004)* found that while the total domestic municipal solid waste (MSW) collected increased from 99,318t in 2002 to 110,409t in 2007 the waste arising per household decreased from 0.94t to 0.88t. Of the domestic MSW arising in 2007, 56,799t was disposed of at landfill. While data relating to commercial waste arisings over the same period is not available the *Review of Waste Management Plan for Cork County (2004)* reported that there was a reduction in the commercial municipal waste arisings from 267,366t in 2006 to 252,659t in 2007, 112,235t of which was landfilled². These

² Due to the nature of commercial waste collection and the method by which it is reported in the Annual Returns (ARs) it was not possible to distinguish between waste arisings in Cork County Councils functional area and that arising in Cork City Council's functional area so figures quoted are for the Cork Region as a whole.

reductions were achieved as a result of a number of regulatory and awareness initiatives implemented by Cork County Council:

Separate Kerbside Collection of Household Waste

The separate kerbside collection of domestic MSW was successfully piloted by the Southern Division of Cork County Council in 2005. Following this a general review of domestic waste collection permits between 2006 and 2007 saw the introduction of a condition requiring the implementation of a two bin collection system by all kerbside operators. This (Condition 6.3.1) requires that "*in accordance with Condition 2.7, the permit holder shall implement and operate a separate system for kerbside collection of dry recyclables from households as was agreed with the nominated authority*". By the end of 2006 both the Southern and Northern Divisions of Cork County Council and three private operators had introduced a two bin collection system and by the end of 2007 the separate kerbside collection of domestic mixed residual waste (MRW) and mixed dry recyclables (MDR) was in operation across the entire functional area of Cork County Council. This measure alone has resulted in an estimated 19,346t of BMW being diverted from landfill in 2008, the latest year for which statistics are available.

When it is also considered that Cork County Council provides a network of 9 Civic Amenity Sites and 157 Bring Banks throughout the council's functional area it is clear that MSW delivered to landfill Youghal Landfill under the current regime has undergone pre-treatment as required under Article 49(5) of the *Waste Management (Licensing) Regulations 2004*.

Pay by Use

The government policy document *Preventing and Recycling Waste: Delivering Change (2002)* recognised that waste charges should be based on usage i.e. *polluter-pays principle*. This was further emphasised in the subsequent policy document *Waste Management: Taking Stock and Moving Forward (April 2004)*. Cork County Council inserted a condition in relevant waste permits reviewed or issued after January 2006 which required the implementation of a pay-by-use charging system where a permit holder was involved in the kerbside collection of domestic MSW. This condition (Condition 6.3.2) states that "*the permit holder shall operate a system of "Pay by Use" from households serviced within Cork County*" and resulted in the introduction, by waste collectors, of one of two charging systems, namely pay-by weight or pay-by-volume. The former incorporates a flat annual charge supplemented by a set charge per kilogram of MRW collected and has been introduced by the council and two of nine private operators - the other private operators charged a set rate dependent on the volume of wheelie bin supplied. The charge for the collection of the MDR is incorporated into the charging structure under both regimes.

Detailed analysis of the ARs for 2008 showed that on average 1.01t of MSW was collected per household annually under the pay-by-volume regime while on average 0.80t was collected under the pay-by-weight regime. This equates to a 21% reduction in domestic waste collected under the pay-by-weight regime compared with the pay-by-volume regime. It was also noted that the quantity of MDR collected annually under both charging regimes was similar with 0.25t/household on average collected under the pay-by-weight regime and 0.26t/household on average under the pay-by-volume regime. It appears, therefore, that the pay-by-weight regime is a more complete interpretation of the polluter-pays-principle and provides the greater incentive for reducing domestic waste arisings and more importantly

diverting waste being disposed of to landfill. In addition research undertaken by the Southern Division has shown that a lower level of contamination of MDR is experienced under the pay-by-weight regime.

Civic Amenity Sites and Bring Banks

Cork County Council currently operate a network of nine Civic Amenity Sites (CAS). A further two sites have just been completed and it is envisaged that they will be operational in 2010. The CAS accept the following waste types: paper and cardboard, glass, aluminium cans, textiles, timber, plastic packaging, batteries, cooking oil, motoring oil, waste electrical and electronic equipment (WEEE), green waste and scrap metal while some facilities are also licensed to accept domestic MRW. In addition the council operate an open windrow composting system at the CAS in Bandon.

The council also provides 157 bring banks (BBs) – the largest number provided by any local authority – and these are located throughout the county. In 2008, the latest year for which statistics are available, CAS and BBs were jointly responsible for the diversion of 25,987t of waste from landfill, 9,070t of which was classified as BMW.

Home Composting

To promote composting and encourage the diversion of green waste, i.e. fruit and vegetable kitchen waste and garden waste, from landfill Cork County Council, in 2004, undertook a promotional scheme whereby compost bins were sold to members of the greater public at a subsidised rate. This scheme has since come to an end and bins are now sold by the council at cost price. Since the inception of the scheme, and up to the end of 2007, the council had sold 6,652 bins. When it is considered that the average household composts 200kg of green waste per annum (Mr. Olivier Gaillot, RPS Consulting Engineers) this suggests that in the region of 1,330t of BMW waste is diverted from landfill annually as a result of this scheme. It should be noted that numerous compost bins are also sold through the network of hardware shops, DIY shops and garden centres located throughout Cork County and, as such, this figure represents a conservative estimate of the waste diverted from landfill through composting. In addition, it is noted that the council supplied free compost bins to all schools participating in the Green Flag scheme.

Environmental Awareness and Research Unit

Waste prevention activities fall under the remit of the *Environmental Awareness and Research Unit* of Cork County Council which was established in 2005. This unit is charged with developing an environmental awareness plan for Cork County and to this end it has developed a strategic policy based on the council's *Strategic and Corporate Plan*, *Waste Management Plan* and *Litter Plan* and the *Environment and Emergency Directorate's Operational Plan*. Central to this policy are preventative initiatives and associated public awareness programmes, both underpinned by environmental research. Among the more successful programmes implemented by the unit are:

Green Flag Scheme

Currently 197 schools are registered with the Green Flag programme, 71 of which have been awarded Green Flags. The aim of the scheme is to raise environmental awareness among school children through various workshops and recycling and on-site composting initiatives. In addition, pilot summer programmes on environmental

education have been established for teachers & youth/community leaders while environmental education programmes have also been developed with other agencies e.g. the Education Unit at Fota Wildlife Park.

Green Fáilte Award for Hotels

The Green Fáilte Award Scheme is aimed at promoting sustainability across the hotel sector by assisting in the reduction waste production in addition to energy and water usage. It was run as a 3 year pilot programme which has now come to a successful conclusion and is about to be rolled out on a national basis. The programme is now called the Green Hospitality Award and the EPA is the primary sponsor. Cork County Council continue to promote and support this programme and there are currently 38 participants of this scheme in Cork, 19 of which have received award recognition.

Waste Prevention Officer

In 2009 Cork County Council received partial funding from the EPA under the Local Authority Prevention Network (LAPN) to support the creation of the post of Waste Prevention Officer (WPO) with responsibility for raising awareness on waste prevention among small and medium enterprises (SMEs) in the East and South Cork Area (SECAD). The WPO is also charged with ensuring that SMEs are familiar with their statutory obligations under the Waste Management Acts, 1996-2008 and assisting them with any related queries. One of the main objectives of the WPO is thus to roll out an education and awareness programme relating to the implementation of the proposed Waste Management (Food Waste) Regulations which aim to reduce the BMW being disposed of to landfill from 9 classes of activity. This is being addressed through the:-

- ✓ Distribution of information leaflets;
- ✓ Provision of workshops for food waste producers and collectors (Appendix B);
- ✓ Provision of support to potential operators of treatment facilities for food waste.

Waste Enforcement Team

A multi-disciplinary waste enforcement team consisting of engineers, scientists, and administration staff was established by Cork County Council in 2006. In summary the waste enforcement team is charged with policing waste activities, both legal and illegal, throughout Cork County Councils functional area and prosecuting breaches in legislation where they occur. Listed among the teams responsibilities which are of relevance to this submission are:

Promoting producer responsibility initiatives through the implementation of the Packaging Regulations

The Waste Enforcement Team is charged with enforcing the *Waste Management (Packaging) Regulations, 2007 (S.I. No. 798 of 2007)*. Under these regulations there is a prohibition on packaging waste producers to dispose of specified packaging waste and an onus on producers to achieve specified recycling targets or register with an approved body i.e. Repak. In 2008 an estimated 88,825t of commercial BMW was diverted from landfill in the Cork Region² the majority of which consisted of paper and cardboard.

Ensuring timely submission of annual returns (ARs) from permit holders

On a more strategic level the Waste Enforcement Team are responsible for ensuring the timely submission of Annual Returns (ARs) by permitted waste collectors. ARs contain, *inter alia*, data describing the type and quantity of waste collected throughout the Cork Region for the preceding year. These data are essential to strategic waste management decision making. The Waste Enforcement Team assumed responsibility for this task in 2007 and in that year achieved an 86% return rate for ARs. This was exceeded in 2008 when a 96% return rate was recorded. The collated data is forwarded to Waste Management Operations and senior management and informs decisions on waste infrastructural investment for the Region. It also allows the council to determine, on an annual basis, the Region's status with respect to the landfill diversion targets (Section 4.0) using best available data and to implement any requisite corrective measures to keep the Region on course to meet its obligations.

Development of Materials Recovery Facility

In the *Waste Management Plan for Cork County (2004)* Cork County Council confirmed its commitment to the development of a MRF – incorporating MBT - to serve the Cork Region. The council has secured a site and in July 2008 appointed RPS Consulting Engineers to provide professional Project Management and full Design Team services for the procurement of the facility. The initial part of this process involved a review of relevant waste policies and regulations, recent waste initiatives, waste generation in the Cork Region, preliminary market surveys to assess possible outlets, preliminary assessment of technologies and proposed procurement options, risk assessment and cost analysis to enable a clear quantification of waste statistics and proposals to meet the *Landfill Directive* diversion targets.

As an interim measure RPS Consulting Engineers were also appointed to procure an Interim Waste Processing Service (IWPS) contract to pre-treat Cork City and Cork County Councils MRW streams in order to comply with the stipulations of the Bottlehill Waste License (WL-161) and the *Landfill Directive*. The waste processing service contract will cover the mechanical separation, baling, transportation to Bottlehill and associated processing and transportation of the organic fraction. The contract duration will be 3 years with an option to extend. This service will run in parallel with the design development and delivery of the permanent MRF/MBT facility for the Cork Region.

4.0 Meeting the Landfill Diversion Targets

The EPA technical guidance document *Municipal Solid Waste – Pre-treatment & Residuals Management* and more specifically the maximum allowable biodegradable content of MSW disposed of to landfill stipulated therein is not only a blunt instrument as acknowledged by Mr. Brian Meaney (Senior Inspector EPA at EPA Waste Workshop 2009, Athlone) but also a wholly inequitable proposition. In addition it disregards two of the core principles of European Waste Strategy, namely the **Polluter Pays Principle** and the **Producer Responsibility Principle**, which seek to ensure that the costs of waste generation and consumption are allocated to those who generate the waste. The targets stipulated by the EPA fail to take account of:

- Each Region's contribution to the total BMW landfilled nationally on an annual basis.

- Measures implemented by Regions to reduce MSW arisings (i.e. Section 3.0).

In other words the methodology used in both the calculation of the targets and their allocation to all landfills licensed by the authority does not encompass any weighting element to take cognisance of the polluter pays and producer responsibility principles thus placing an iniquitous burden on the Cork Region among others (Table 1.0 and Table 2.0).

Table 1.0 2010 Diversion requirement for Cork Region based on RPS Weighted Method

Description	Ireland (t)	Cork Region (t)
BMW permitted to landfill in 2010³	967,433	139,952
BMW originating in Cork Region and destined for landfill in 2007 ⁴		151,327
BMW originating in Cork Region and destined for landfill in 2008 ⁵		145,218
Projected BMW originating in Cork Region and destined for landfill in 2010 ^{5,6}		153,812
Projected BMW diversion requirement for 2010		13,860

Table 2.0 2010 Diversion requirement for Cork Region based on EPA Pre-treatment Document

Description	Quantity (t)
Projected MSW destined for landfill originating in Cork Region ⁵	212,441
Projected BMW destined for landfill ^{5,6}	153,812
Projected non-BMW destined for landfill ⁵	58,629
Projected BMW removed through mechanical treatment	56,085
Projected stabilised BMW destined for landfill following mechanical treatment ^{7,8}	28,043
BMW permitted to landfill⁹	57,781
Projected BMW diversion requirement for 2010	96,031

When it is considered that the Cork Region contains 11.4% of the national population and is responsible for approximately 10% of the total BMW being landfilled annually the inequity of the EPA methodology is further emphasised. By applying these weightings to the 57,781t of BMW permitted to landfill in 2010 (as stipulated under the pre-treatment document – Table 2.0) it follows that the national target should be of the order of 506,851t – 577,810t as opposed to 967,433t (Figure 1.0). In other words the BMW diversion target being imposed on the Cork Region is not in proportion to the Region's contribution to BMW being landfilled nationally nor is it in proportion to the Regions share of the national population.

³ Figure 1.0

⁴ From ARs received and collated by Cork County Council in 2008. Not all of this BMW was landfilled in Cork Region but it was generated within the Region.

⁵ Projections based on ARs received and collated by Cork County Council in 2009. Not all of this BMW was landfilled in Cork Region but it was generated within the Region.

⁶ This does not take into account the affect of the introduction of the brown bin and the implementation of the Waste Management (Food Waste) Regulations on the BMW content of MRW arisings.

⁷ Assume 50% moisture.

⁸ Must consider the implications of a levy on the gate fee for stabilised material.

⁹ Assume that all non-BMW and stabilised BMW (i.e. 86,672t in total) goes to landfill in Cork Region for the purpose of this exercise (Condition 5.2.11 of licence). This equates to 60% of MSW going to landfill (the other 40% being the permitted BMW).

In addition it is noted that Table 5.1 of the *National Biodegradable Waste Strategy (2006)* states that the total national BMW diversion requirement for 2010 is in the region of 1,412,083t. Therefore applying the "10% rule" the Cork Region will be responsible for diverting 141,208t of BMW in order to ensure that the 2010 target is met. It can be seen from Section 3.0 that the Cork Region is currently diverting approximately 118,571t of BMW annually and with the implementation of the Food Waste Regulations in July 2010, the roll out of brown bin for the domestic sector and the requirement for MSW to be mechanically treated prior to landfilling the current gap of 22,637t BMW will be closed (Note: Consider that 56,085t of BMW can be removed through mechanical treatment alone). This again emphasises the inequity of the crude methodology applied by the EPA in the calculation of the limits specified in the pre-treatment document.

5.0 Licence Conditions

These are an additional 4 issues conditions listed in the licence

Condition 5.2.8

Condition 5.2.8 sets the limits on acceptance of BMW at Youghal landfill as discussed in Section 4.0 above but states that these are applicable to the calendar year. This however is inaccurate as the BMW diversion targets stipulated in the Landfill Directive (1999/31/EC) are applicable from 16th July 2010 in the Irish context.

Condition 5.2.10 and 5.2.14

Conditions 5.2.10 and 5.2.14 place an onus on the landfill operator, i.e. Cork County Council, to ensure through a monitoring regime set out in Schedule D of the licence that treated BMW accepted at the landfill has been stabilised. The onus is also placed on the landfill operator to determine the biodegradable content of MSW being disposed of at landfill. Based on the monitoring schedule outlined in Schedule D it is estimated, at this initial stage that, Condition 5.2.14 may necessitate that Cork County Council 500 tests per annual

Condition 7.6.3

What constitutes Ambient Odour Monitoring? What analysis method or technique is required?

Condition 7.7.1

CCC have grave Health and Safety concerns regarding the supplementing of the Gas Flare with a natural gas source. These have been outlined in previous correspondence going back to September 2008. Although the gas system may not require any supplementing for many years to come all necessary pipework and tanks would have to be supplied and constructed. This area would have to be secured and monitored. This condition does not take into consideration of the continual improvement in Gas Flare technology allowing for lower levels of methane (>12%) to be burned off.

6.0 Conclusions

It is the position of Cork County Council that citation of the "new requirements" referred to in Section 46(2)(b) of the Waste Management Acts, 1996 to 2008 as a justification for this review is disingenuous. The Landfill Directive has been in existence since 1999 and the Cork Region took initial measures to address its obligation under what was then a draft Directive as far back as 1995 with the compilation of the *Waste Management Strategy for Cork Region*. These measures, as discussed in Section 3.0, have involved, *inter alia*, considerable investment in infrastructure and awareness and enforcement programmes all of which is now being undermined by the inequitable BMW targets stipulated by the EPA for Youghal Landfill. More importantly these measures have been very effective to date and contribute to a diversion of approximately 118,571t of BMW from landfill annually.

The waste management strategy adopted by Cork County Council assigns responsibility for waste generation and disposal as close to source as feasible and is thus consistent with the subsidiarity and polluter pays principles.

In practice the methodology applied by the EPA in the calculation of the limits on acceptance of biodegradable municipal waste as specified in Condition 5.2.8 does not take account of the contribution of each Region to waste landfilled annually. This lack of weighting leads to an unfair burden being imposed on the Cork Region which in quantitative terms, equates to an excess diversion requirement of approximately 82,000t.

The **Prevention Principle**, along with the aforementioned polluter pays principle and producer responsibility principle, forms a core tenet of the waste management strategy for Cork County. However, the limit of acceptance of biodegradable municipal waste as outlined in Condition 5.2.8 does not take into account the upstream measures that have been implemented to reduce waste going to landfill. As these measures also result in a reduction in the non-BMW content of MSW going to landfill the Region is being punished for implementing the prevention principle. It must thus be considered that the scenario can arise, most probably at a local level whereby the content of BMW going to landfill could be greater than 40% yet the Landfill Directive diversion target will be achieved.

In summary, the targets as presented in Condition 5.2.8 bear no relationship to the BMW diversion targets stipulated in the Landfill Directive which have been converted to specified targets for the country, i.e. 967,433t in 2010, 644,956t in 2013 and 451,469t in 2016. Therefore a specified allowance, i.e. tonnage of BMW permitted per year, based on waste arisings in each Region would be a more conducive approach.

Appendix A

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Calculation of BMW diversion requirement (t)

	2007	2010	2013	2016
MSW arising (t)¹	411,339	426,384	452,951	486,929
MDR arising (t)	185,350	191,119	202,785	217,440
MRW arising (t)	207,782	215,725	229,248	246,631
Other (t)	18,207	19,539	20,918	22,858
BMW content of MRW arising (t)²	151,437	156,701	166,398	178,728
BMW permitted to landfill (t)³	N/A	139,952	93,301	65,311
Gap (t)	N/A	16,749	73,097	113,417
BMW diverted through Mechanical Treatment (t)⁴	N/A	56,952	60,521	65,110
BMW diversion requirement (t)⁵	N/A	-40,202	12,576	48,307

- 1 Calculated from ARs submitted by authorised collectors and projections for future waste arisings supplied by RPS Consulting Engineers.
- 2 BMW calculated as 76.4% and 57.5% of domestic MRW for city and county, respectively, and 80% of commercial MRW (RPS Consulting Engineers).
- 3 BMW landfill diversion targets apportioned based on the relative share of each local authority for MSW disposal in 1995.
- 4 Includes both commercial and domestic and assumes 40% separation 66% of which is diverted.
- 5 This does not consider MRW currently undergoing mechanical treatment.

Appendix B

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For European Week for Waste Reduction
Cork County Council and South & East Cork Area Development Presents

REDUCE WASTE, REDUCE COSTS.

**Waste Prevention Opportunities Work Shop For Businesses
in the Catering and Hospitality Sector**

**Tuesday 24 November 2009, 9.30am – 11.00am
Midleton Park Hotel, Midleton, Co Cork**

Introduction

Faced with tightening profit margins, businesses are constantly looking for ways to cut their costs. Reducing your waste through simple waste prevention procedures goes hand in hand with reducing operation costs. Savings can be realized through waste prevention, water conservation & energy efficiency. This short focused workshop will provide information on how to improve environmental performance and reduce associated costs. Also advice will be provided on how to ensure legal compliance with impending food waste regulations, which will impact on all businesses where food waste is produced.

The workshop is targeted at businesses in the Catering and Accommodation Sector (including hotels, bars, restaurants, supermarkets, nursing homes, and catering facilities in business/industry etc)

Is there a charge?

Attendance is free. Cork County Council Local Authority Prevention Network Programme, supported by SECAD, is hosting this event and is funded by the Environmental Protection Agency National Waste Prevention Programme.

Further Information & Booking

Please register for this event by returning completed form enclosed or by sending your name & contact details to accustom@secad.ie or by phoning Claire on 021 4513432 by Thursday 18 November 2009. Places are limited so please register early.



REDUCE WASTE, REDUCE COSTS.

Event Schedule

09:30	Registration - Tea/Coffee	
09:40	Welcome Address	Ryan Howard CEO SECAD
10:45	An Overview of the proposed Waste Management (Food Waste) Regulations. This presentation will inform you of your obligations in relation to food waste when the regulations come into effect. Guidance will be given on how you can prepare to ensure compliance.	Claire Kelly Executive Engineer Cork County Council
10:00	Managing Waste, Managing your Costs – Experiences from the Clean Technology Centre This presentation will give the background to the Green Hospitality Awards Scheme and its benefits. Specific examples of cost savings through waste, water and energy in the hospitality/catering sector will be included. James Hogan will also provide information on the new EPA booklet, Managing Food Waste.	James Hogan Environmental Consultant Clean Technology Centre
10:30	Wastematchers An overview of the online waste exchange service for business	Catherine Costello, Macroom, E
10:45	Q & A	

James Hogan has been an Environmental Consultant and Researcher with the Clean Technology Centre based at CIT since 1995. His areas of expertise include: Environmental Management Systems, Waste Auditing, Cleaner Production, Energy Efficiency. James has worked with a range of industry and commerce from the large multinational to the corner grocery shop. He was instrumental in setting up the Green Hospitality Award for hospitality businesses which has saved the sector millions of euros in reduced utility costs. James is now resident in Middleton.

Registration Form

Name: _____

Organisation: _____

Phone: _____ email address: _____

Please fax form to 021 4613608

Or return by post to
SECAD
Middleton Community Enterprise Centre
Knockgriffin
Middleton
Co. Cork

Ann Kehoe

From: Nicholas Bond [nicholas.bond@corkcoco.ie]
Sent: 16 November 2009 16:52
To: Licensing Staff
Subject: New Applicant objection entered for Reg no: W0068-03. (Reference Number: W0068-03-091116045209)
Importance: High
Attachments: Submission on W0068-03 - Cork County Council.doc

Title: Mr
First Name: Nicholas
SurName: Bond
Organisation Name: Cork County Council
Address Line 1: Inniscarra
Address Line 2: Co. Cork
Address Line 3:
County: Cork
Post Code: 0000
Phone Number:
Email: nicholas.bond@corkcoco.ie
Objector Type: Applicant
Oral Hearing: No

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Ann Kehoe

From: Licensing Staff
Sent: 16 November 2009 16:53
To: nicholas.bond@corkcoco.ie
Cc: Licensing Staff
Subject: Successful Objection Payment for Licence Number W0068-03. (Reference Number: W0068-03-091116045209)

Thank you for your online Applicant Objection for licence number W0068-03. Your objection has been received by the Environmental Protection Agency and will be acknowledged once the Objection has been validated.

A fee of €500 will be debited from your credit card once the objection has been confirmed.

Your reference number is W0068-03-091116045209. Please retain this for future reference.

Regards,

Environmental Protection Agency

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Ann Kehoe

From: Licensing Staff
Sent: 17 November 2009 09:00
To: Accounts Receivable
Subject: FW: Successful Objection Payment for Licence Number W0068-03. (Reference Number: W0068-03-091116045209)

Please process online objection fee

Regards
Ann

From: Licensing Staff
Sent: 16 November 2009 16:53
To: nicholas.bond@corkcoco.ie
Cc: Licensing Staff
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