

Yvonne Furlong
EPA Headquarters
PO box 3000
Johnstown Castle Estate
Co Wexford



Tom Gavin
Sand and Gravel
Merchants Ltd
Upper Punchestown
Rathmore
Naas Co Kildare

07/04/10

Dear Ms Furlong

I refer to your letter of the 15th of March 2010.

The Soil Recovery Association (we are members) is currently arranging a meeting with the EPA and the DOE to discuss the Implications of EU Directive 2008/98/EC and other issues affecting the industry. There is a strong possibility that inert soil and stone could be declassified as a waste and therefore making licensing defunct. The directive is currently with the EPA for its consideration. We ask you to put our application on hold until after this meeting so we don't incur any further expenditure until this matter is clarified.

If this is not possible please clarify the EPA's view on the directive. Will the EPA be recommending to the DOE that inert soil and stone is not to be declassified as a waste and will remain licensable for the foreseeable future? (the DOE has informed us it is awaiting the EPA's recommendations on the directive)

I also note that other applications lodged with the EPA on the same day as ours are not being processed as expediently as ours. Some sites have not even received a site visit from the EPA. Their applications have been put on hold by defacto. Our site is the smallest of all the sites going for licence and therefore would pose the least environmental risk. In the current business environment it is critical that all licences are treated equally to allow fair competition.

Yours sincerely


Tom Gavin

Cc. Mr Brian Meaney EPA
Mr Pat Fenton Dept of the Environment, Heritage and Local Government
Mr John Sheils