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Applicant Objection

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Objection To
Proposed Decision
Waste Licence Application No.W0263-01
Irish Packaging Recycling Limited

Prepared For: -

Irish Packaging Recycling Limited,
Rathdrinagh,
Navan,
County Meath.

Prepared By: -

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20th July 2010

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1. INTRODUCTION

Irish Packaging Recycling Ltd, (IPR), the applicant, wishes to object, under Section 42 of the Waste Management Acts 1996 to 2010, to the Proposed Decision (PD) for a Waste Licence, Application Register No.W0263-01, for its Facility at Ballymount Road, Walkinstown, Dublin 12.

Section 2 contains the grounds for the Objection and the relevant fee (€500) accompanies this document.

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2. GROUNDS FOR OBJECTION

Part II Schedule of Activities Refused:

None of the activities as set out in the licence application have been refused.

The application included for the acceptance of 200,000 tonnes of waste comprising Mixed Dry Recyclables (50,000 tonnes); Segregated Paper, Plastic and Cardboard (50,000 tonnes); Mixed Municipal Solid Waste (50,000 tonnes) and Construction and Demolition Waste (50,000 tonnes).

In the application lodged on 13th February 2009, it was proposed to accept 150,000 tonnes of waste annually, comprising Mixed Dry Recyclables (50,000 tonnes) and Paper and Cardboard (100,000). The proposal to accept Mixed Municipal Solid Wastes, Construction and Demolition Waste and an overall total of 200,000 tonnes, were described in the 14 (2)(b)(ii) Reply 1 response dated 1st September 2009.

The Proposed Decision approves the acceptance of Mixed Dry Recyclables, Segregated Paper, Plastics and Cardboard and Construction and Demolition Wastes, but refuses the acceptance of Mixed Municipal Solid Waste and the total annual waste input of 200,000 tonnes. This is contrary to the statement in the Part II Schedule of Activities Refused.

The grounds for the Agency's refusal to allow the acceptance of Mixed Municipal Solid Waste and the overall annual input of 200,000 tonnes are not presented in the Proposed Decision.

The Recommended Decision, issued by the Office of Climate, Licensing & Resource Use (OCLR), approved the acceptance of 200,000 tonnes of waste annually, including 50,000 tonnes of Mixed Municipal Solid Waste. It also contained conditions that ensured the acceptance and processing of the Mixed Municipal Solid Waste would be carried out in a manner that would not contravene any of the requirements of Section 40(4) of the Waste Management Acts 1996 to 2010.

It appears from the 'Extract from the Minutes of the 616th Licensing Meeting of the Environmental Protection Agency, held on 11th May 2010', that the Directors of the EPA overturned the OCLR's decision by to approve the acceptance of Mixed Municipal Solid Waste and the total annual input of 200,000 tonnes. However the grounds for the Director's decision are not presented in the 'Extract'.

IPR concurs with the decision of the OCLR that there are no valid environmental grounds for the refusal to approve the acceptance of Mixed Municipal Solid Waste and a total annual intake of 200,000 tonnes. IPR also concurs with the OCLR, that the operational conditions set in the Recommended Decision would ensure that the acceptance of Mixed Municipal Solid Waste and total annual input of 200,000 tonnes will not result in any environmental impairment.

IPR requests that the Conditions 3.11, 6.19.1, 8.2.2, 11.13 and Schedule A2 be amended to authorise the acceptance of Mixed Municipal Solid Waste and 200,000 tonnes of waste annually, as in accordance with the OCLR Recommended Decision.

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