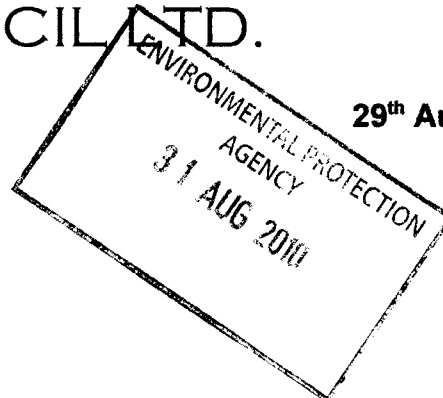


CARRIGNAVAR COMMUNITY COUNCIL LTD.

29th August 2010

The Environmental Protection Agency,
P.O. Box 3000,
Johnstown Castle Estate,
Co. Wexford.



Re: Bottlehill Landfill: Waste Licence W0161-01 Review and Proposed Decision

Dear Sir/Madam,

We wish to lodge an objection to the proposed changes in the above licence, specifically to two parts:

Condition 5 does not include a requirement for any waste to be baled apparently based on the Licensee's submissions and the Inspectors agreement. The licensee argued that the baling of waste prior to landfill is no longer best practice in terms of landfill operation and it is their opinion that the option to accept baled or unbaled waste should be at the discretion of the facility operator. The Inspectors found nothing flawed in the arguments offered by the licensee

Our view on this is that only one other landfill site in this country has operated the baling of waste prior to acceptance and the Inspectors report totally ignores this fact and studiously ignores any similar baling operations within the EU. It appears, moreover, that the Inspectors merely looked at historical documents from it's own library and did not explore international practices in this regard. The EPA Inspectors "cannot find any technical reason as to why the predominant acceptance of baled waste should be an environmentally superior option over the general acceptance of unbaled waste". We are puzzled by this sentence. It appears the Inspectors accept there is a predominant acceptance that baled waste is environmentally superior to unbaled waste. They just couldn't find the technical data as to why this view was held??!!

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REGISTRATION NUMBER 101815

CHAIRMAN: TOM HOWARD, DROMBOY SOUTH, CARRIGNAVAR, CO. CORK.

SECRETARY: FERGUS MC CARTHY, BALLYSKERDANE, CARRIGNAVAR, CO. CORK.

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The EU Landfill Directive has been transposed into national legislation by the Waste Management (Licensing) Regulations, 2000 (S.I. No.185 of 2000), the Waste Management (Licensing) (Amendment) Regulations, 2002 (S.I.No.336 of 2002) and the European Communities (Amendment of Waste Management (Licensing) Regulations, 2002) (S.I.NO.337 of 2002). Under the new regulations all waste to be landfilled must be treated. The term "treatment" also implies the baling of waste at a waste baling facility, and source segregation and sorting at a Materials Recycling Facility prior to recovery of waste and disposal of non-recyclables at landfill.

For the EPA to turn around and allow for *no baling whatsoever* when it's own investigations appear to be lazy and yet national legislation provides for it is shocking to say the least when the EPA is the body charged with having the technical knowledge to protect our environment.

The second objection relates to Condition 12.2.3.

"the licensee shall, to the satisfaction of the Agency, make financial provision to cover any liabilities associated with the operation (including closure, restoration and aftercare) of the facility. The amount of indemnity held shall be reviewed and revised as necessary, but at least annually"

It is our opinion that this should be amended to require the licensee to lodge a bond, to be managed by the N.T.M.A to cover the costs involved in the event of default by the licensee or by the future owner/operators of the facility. Recent financial crises require a more prudent approach than that outlined in the EPA condition.

Yours sincerely,

P.P. Tom Howard

TOM HOWARD,

Chairman Carrignavar Community Council and member of Bottlehill Residual Landfill Environmental Monitoring Committee

Fergus Mc Carthy
Fergus Mc Carthy, Secretary

P.S. Cheque for €200 enclosed for fee.

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