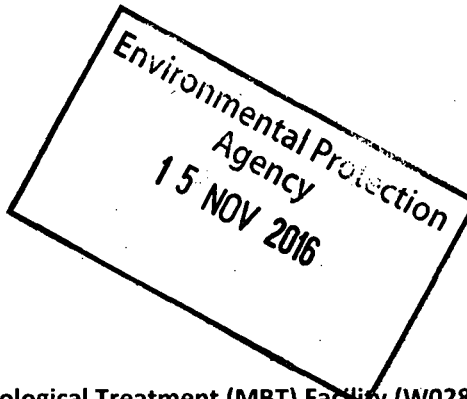


BORD NA MÓNA
Naturally Driven

Mr. Frank Clinton
Programme Manager
Environmental Licensing Unit
Environmental Protection Agency
Johnstown Castle Estate
County Wexford

By Email and Post

9th November 2016



Re: Drehid Mechanical Biological Treatment (MBT) Facility (W0283-01)

Application in accordance with s.49 of the Waste Management Act

Dear Mr. Clinton,

In accordance with the provisions of section 49(2)(b) of the Waste Management Act 1996, as amended (the Act), we hereby apply for an extension of the period applying to this licence, as referred to in section 49(1) of the Act, to a period of 10 years.

This request is made particularly in view of the facts that

- (a) the activities at the licensed site have not yet commenced,
- (b) the *appropriate period* of the planning consent is 10 years, as provided for in section 41 of the Planning and Development Act 2000, as amended
- (c) the extended period is to provide an option to develop the Anaerobic Digestion (AD) step at a later stage subject to adequate future fiscal incentives for the development of AD – as discussed during the pre-application consultation process.

In respect of (c) above, and as set out in section 2.2 of the EIS,

In deciding on the configuration of the biological process, and in particular the inclusion of AD, consideration was had of the fiscal incentives for the development of AD – namely the Renewable Energy Feed In Tariff (REFIT). Regrettably, the fiscal incentives in the Republic of Ireland make it difficult to create a compelling or indeed viable, economic argument for the development of AD. The REFIT for AD in the Republic of Ireland is significantly inferior to its equivalents in Northern Ireland and Italy (for example).

Therefore, Bord na Móna proposed the preparation of the regulatory applications for the facility such that they provided for the development of an optional AD step as part of the biological treatment stage. This approach was subject to detailed pre-application discussions with both An Bord Pleanála and the EPA.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "John Connolly".

John Connolly
Bord na Móna