Industrial Emissions Licence Application

Connolly's RED MILLS

Application Ref. - LA001443

Section 8.2 - Additional Documents

Waste Hierarchy

National Waste Management Policy

A number of national waste management policies have been implemented since the initial national waste management policy document "Changing Our Ways" was issued by the Department of the Environment and Local Government in 1998. The policy was linked to the EU waste management hierarchy and was supported by EU legislation (i.e., EU Landfill Directive 99/31/EC) that set targets for reducing volumes of biodegradable waste based on 1995 figures. The targets were:

- Minimum 25% reduction by 2010 (4-year derogation);
- Minimum 50% reduction by 2013 (4-year derogation); and
- Minimum 65% reduction by 2016.

The follow up Policy statement in 2002 "Preventing and Recycling Waste – Delivering Change" looked at initiatives to achieve targets in the Waste Hierarchy and achieve increased recycling rates nationally.

In 2004 the document "Waste Management" – Taking Stock and Moving Forward "identified and acknowledged the improved recycling rates being achieved in Ireland since 1998 and that increased efforts were also required.

The EU Waste Framework Directive 2008/98/EC was introduced to ensure coordination on waste management within Member States to limit waste generation and optimise waste management and treatment options. The Directive was transposed into Irish law by the European Communities (Waste Directive) Regulations 2011. Under the requirements of the Directive Member Stares must reuse or recycle 50% of certain household wastes and reuse, recover or recycle 70% of C&D waste by 2020.

The most recent Waste Policy Statement "A Resource Opportunity- Waste Management Policy in Ireland 2012" is also based on the original EU waste hierarchy and includes requirements for waste prevention, reuse, recycling, recovery and disposal. The document includes ways that the Country can reduce reliance on finite resources, almost entirely reduce dependence on landfill and minimise the impact of waste management on the environment. A key objective of the policy is that when waste is created the maximum value should be extracted from it by ensuring that it is recycled, reused or recovered.

Southern Region Waste Management Plan

In 2012, the Government's blueprint for a circular waste economy, as set out in *A Resource Opportunity—Waste Management Policy in Ireland*, established a new framework for the provision of effective and efficient waste management services through the establishment of three waste

management planning regions. The Southern Region (SR), serving a population of 1,541,439, includes the administrative areas of the following local authorities — Carlow County Council, Clare County Council, Cork City Council, Cork County Council, Kerry County Council, Kilkenny County Council, Limerick City & County Council, Tipperary County Council, Waterford City & County Council and Wexford County Council.

The new approach aims to promote the following:

- prevent or minimize the production and harmful nature of waste,
- encourage and support the recovery of waste,
- ensure that such waste as cannot be prevented or recovered is safely disposed of, and
- address the need to give effect to the polluter pays principle, in relation to waste disposal.

Section 15.4.1 of the Southern Region Waste Management Plan assessed the waste projection in Ireland and according to the ESRI, reliance on landfill is projected to "decrease significantly below current levels with recovery and recycling activities expected to dominate". It anticipates that incineration and other treatment technologies such as composting, refuse derived fuel manufacture etc., will play a key role in achieving waste management plan policy targets. The ESRI also notes that "figures suggest that, while pre collection activity (e.g. segregation waste for recycling) is important, increasingly greater capacity will be needed in post collection treatment of the residual bin". This indicates that the post collection processing of residual waste including the removal and treatment of the organic fraction is projected to increase.

Section 19 of the Southern Region Waste Management Plan (SRWMP) indicates three main targets. Of the three targets, two are directly related to ensuring that recycling materials and reducing direct disposal of unprocessed waste to landfill main targets that relate to Red Mills are:

- > Target 2 achieving a recycling rate of 50% of managed municipal waste by 2020
- ➤ Target 3 reducing to 0% the direct disposal of unprocessed residual municipal waste to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous Recovery practices". (Unprocessed residual waste means residual municipal waste collected at kerbside or deposited at landfills/CA sites/transfer stations that has not undergone appropriate treatment through physical, biological, chemical or thermal processes, including sorting)

To achieve the targets the SRWMP indicates that there will be a need to increase the level of kerbside collection, implement and regulate a pay-by-weight system, plan and develop higher quality waste treatment infrastructure (including biological treatment) and grow the biological treatment sector, in particular composting and anaerobic digestion.

Under the Waste Framework Directive, the recycling of waste is defined as ""any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes" and "includes the reprocessing of organic material".

The requirements of the SRWMP indicate the need for new waste management methods, moving away from the previous method of landfill. With this in mind Red Mills endeavour to prevent and minimise volumes of waste produced on site as far as practicable and for those wastes that are produced on site the preferred route would be for waste materials to be recycled. Any waste materials

that cannot be recycled are removed from site by a licensed waste contractor for physical processing prior to the material being recovered as a fuel with the residual organic fraction being biostabilised

Red Mills actively segregate waste materials on site and employ Recycling Solutions Ltd. to ensure that the wastes they produce are handled and managed as high up the waste hierarchy as possible and conform with the targets the SRWMP. The materials produced and the waste management process associated with each material are outlined in Table A below.

Table A – Red Mills Waste Materials & Associated Waste Management Route

Waste Material	Waste Hierarchy Level
Cardboard Packaging	Recycled
Mixed Plastic Packaging	Recycled
Poly Propylene	Recycled
Paper Packaging	Recycled
Wooden Packaging	Recycled
Mixed Municipal Waste	Recovery / Disposal
C&D Waste	Recycled / Disposal