
SRCL

Unit 1A, Allied Industrial Estate, Kylemore Road, Ballyfermot,
Dublin 10

Appropriate Assessment Screening

Report Date:

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KD Environmental Ltd.

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Executive Summary

SRCL are proposing a change to the waste acceptance schedule of EPA Waste Licence W0054-02. SRCL have presented a licence alteration request of waste licence W0054-02 to the EPA for this change. The proposed change will not result in an increase of the total waste quantities accepted on site or require a change to the infrastructure on site at SRCL. However, under Articles 6(3) and 6(4) of the Habitats Directive 92/43/EEC, plans or projects in, connected to, or within 15 kilometres of Natura 2000 sites require initial screening for Appropriate Assessment (AA) in order to determine if the plan or project has the potential to impact on the Qualifying Interests (QIs) or Special Conservation Interests (SCIs) of Natura 2000 protected sites. If this is the case, a Natura Impact Statement for the works must be prepared and mitigation measures to prevent detrimental effects on the protected area must be incorporated into the plans or projects.

The SRCL facility is within 15Km of a number of Special Conservation Areas (SAC) and Special Protection Area (SPA) that are Natura 2000 sites. There is also a direct hydrological link between the SCRL facility and the Natura 2000 sites located in Dublin Bay as the River Camac receives stormwater from the SRCL facility and is a tributary of the River Tolka.

The proposed change to by SRCL to the waste acceptance schedule of EPA waste licence W0054-02 will not, in the view of best scientific knowledge and in the view of conservation objectives, impact on the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of Natura 2000 sites.

Background to the author:

A site visit and other supporting work for the completion of this AA Screening and NIS report was conducted by David Kelly BSc. MSc. of KD Environmental Ltd. This report was also prepared by David.

David holds a BSc (Hons) in Environmental Science and an MSc (Hons) in Environmental Protection. He has been working in the field of environmental protection for over twenty years and is a Director with KD Environmental Ltd.

David is a recognised Environmental Specialist and has performed Appropriate Assessments for many projects throughout Ireland in recent years.

1.0 Introduction

Elaine Casey, EHS Manager withy SRCL commissioned KD Environmental Ltd. to complete an Appropriate Assessment Screening Report for a proposed change in site operations. The SRCL facility operates under waste licence No. W0054-02 granted by the EPA.

SRCL are currently seeking a licence alteration request from the EPA to change the permitted quantitative of hazardous waste types accepted on site. It should be noted that the overall quantity of hazardous waste accepted on site would not increase with this change. The alteration is to the quantities of two different hazardous waste streams with the overall total hazardous waste quantity remaining the same. The tables below summarise the changes proposed by SRCL to waste licence W0054-02:

WASTE TYPE	Current W54-02 (TONNES PER ANNUM)	Proposal
Used sharp instruments, Infected or potentially hazardous healthcare risk waste Laboratory waste	2,072	3,072
HEPA Filters, obsolete Mechanical Equipment, Surgical equipment	260	260
TOTAL	2,332	3,332

WASTE TYPE	Current W54-02 (TONNES PER ANNUM)	Proposal
Non Hazardous waste	500	500
Hazardous waste	9,025	8,025
TOTAL	9,525	8,525

Figure 1: Proposed Changes to Waste accepted at SRCL

The proposed change to waste licence W0054-02 may be a temporary one. The change is sought to facility changes in waste trends following the Covid-19 pandemic. There has been a significant increase in the generation of hazardous healthcare since the Covid-19 pandemic emerged. It is proposed to accept 1,000 tonnes per annum more of healthcare risk waste while at the same time accept 1,000 tonnes per annum less of hazardous chemical waste.

The SRCL facility is not within the boundary of a Special Area of Conservation (SAC) or Special Protected Area (SPA). It is however within fifteen konometers of a number of such protected sites and therefore, in order to comply with Article 6(3) and Article 6(4) of the EU Habitats Directive, the proposed change in operations on site are subject to Appropriate

Assessment screening. Following Appropriate Assessment Screening, if it is concluded that effective control measures must be incorporated into work practices to ensure that the SRCL planned change does not result in detrimental effects on Natura 2000 protected sites, a Natura Impact Statement (Stage 2 Appropriate Assessment) will be required for this planned change in order to comply with the Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC).

This Appropriate Assessment Screening has been prepared in accordance with Articles 6(3) and 6(4) of the Habitats Directive 92/43/EEC (Assessment of Plans and projects significantly affecting Natura 2000 Sites) and in accordance with the following guidance documents;

- Department of the Environment, Heritage and Local Government, (2010). Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities.
- European Commission (2002) Management of Plans and Projects significantly affecting Natura 2000 Sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Office for Official Publications for the European Communities, Luxembourg.
- Managing Natura 2000 sites; the provisions of Article 6 of the habitats Directive 92/43/EEC (EC Environment Directorate General 2000, hereafter referred to as MN2000).

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2.0 Background to Appropriate Assessments

An Appropriate Assessment (AA) is required under the Habitats Directive 92/43/EEC, Article 6(3) and Article 6(4) Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites. Such assessments are required where it is identified that a proposed plan or project could have significant impact on a Natura 2000 site.

The Department of the Environment Heritage and Local Government guidelines (DOELHG, 2009 & 2010) provides guidance in accordance with the Assessment of plans and projects significantly affecting Natura 2000 sites Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC. These guidelines promote a four-stage process to complete the Appropriate Assessments and outline the issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required. The four stages are summarised diagrammatically in Figure 2 below.

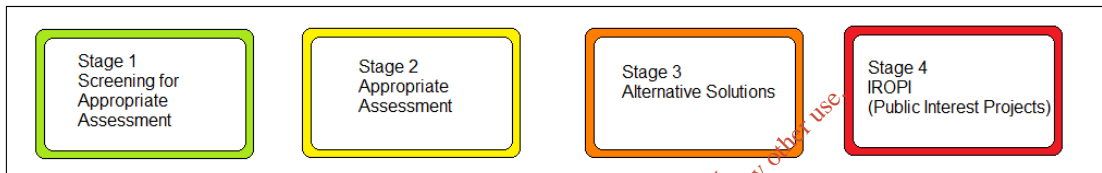


Figure 2: Appropriate Assessment stages

If following Appropriate Assessment Screening, it is concluded that works have the potential to result in adverse impacts on Natura 2000 sites and to cause environmental effects which are deemed to be significant, potentially significant or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 AA.

3.0 Location of the SRCL Waste facility

The SRCL waste facility is located in Allied Industrial Estate in Ballyfermot, Dublin 10. The immediate surrounding land use is industrial with high density residential developments further along Kylemore Road.

There are no sensitive agricultural receptors within 150m of the site. The surrounding topography is a simple terrain.

The Grand Canal is located approx. 120m from the SRCL facility. SRCL do not discharge directly or allow fugitive emissions to enter the Grand Canal.

The River Camac receives surface water from the site and this waterway is a hydrological link from the SRCL waste facility to downstream Natura 2000 sites within Dublin Bay to the East. The River Camac forms part of the River Tolka catchment and has been given a Q3 rating by the EPA in its last study in 1998 at Kylemore Road. It is subject to potential polluting run-off from a large number of industrial and commercial sources along its path through Dublin to Dublin Bay. A more recent assessment of the Camac River conducted by the EPA downstream of Kylemore Road Bridge in 2010 also concluded a Q3 rating. The Camac River is therefore seen as being of Class C sensitivity. The Camac River has not been designated a Coastal or Estuarine water.

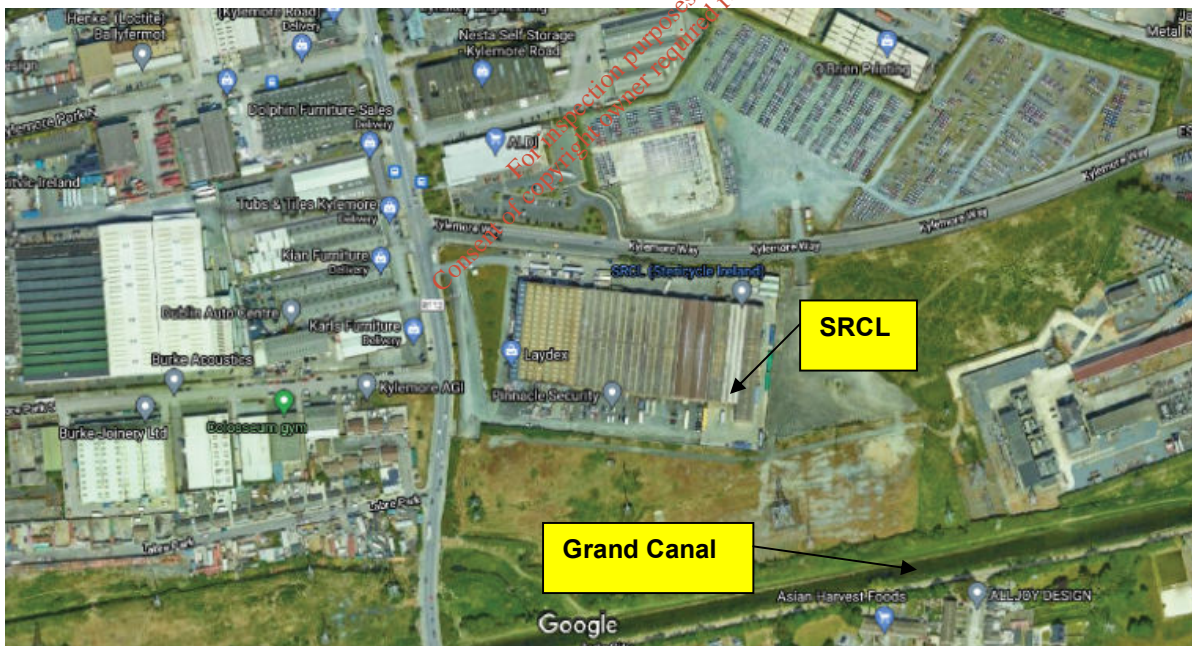


Figure 3: Ariel View of SRCL (google maps)

4.0 Appropriate Assessment Screening

4.1 AA Screening Approach – Zone of Influence and Natura 2000 sites

As per Appropriate Assessment guidance, Natura 2000 sites within 15 kilometres of the proposed works locations must be considered when performing the Appropriate Assessment Screening for this project. This 15Km zone is often referred to as the 'Zone of Influence' (ZOI). However, when considering potential impacts such as noise and direct disturbance, we would expect that the potential ZOI will be much less than 15Km. Likewise for hydrological impacts the ZOI can be greater than 15Km.

The potential impacts of the SRCL planned change to EPA waste licence W0054-02 on these protected sites have been assessed using the recognised source – pathway- receptor approach. If a pollution pathway (chiefly hydrological) exists between the source (SRCL facility) and receptor (protected area Qualifying Interests and Special Conservation Interests), there may be a potential pollution risk. A hydrological pathway allows for potential pollutants and contaminants to travel to downstream receptors using water as a transport medium. In this case the River Camac which receives stormwater from the SRCL facility, as permitted by the EPA, is the pathway. The Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of downstream Natura 2000 site in Dublin Bay are the relevant receptor as these protected areas have a hydrological link with the SRCL facility.

A map illustrating the proximity of the SRCL facility to NATURA 2000 sites follows as figure 2.

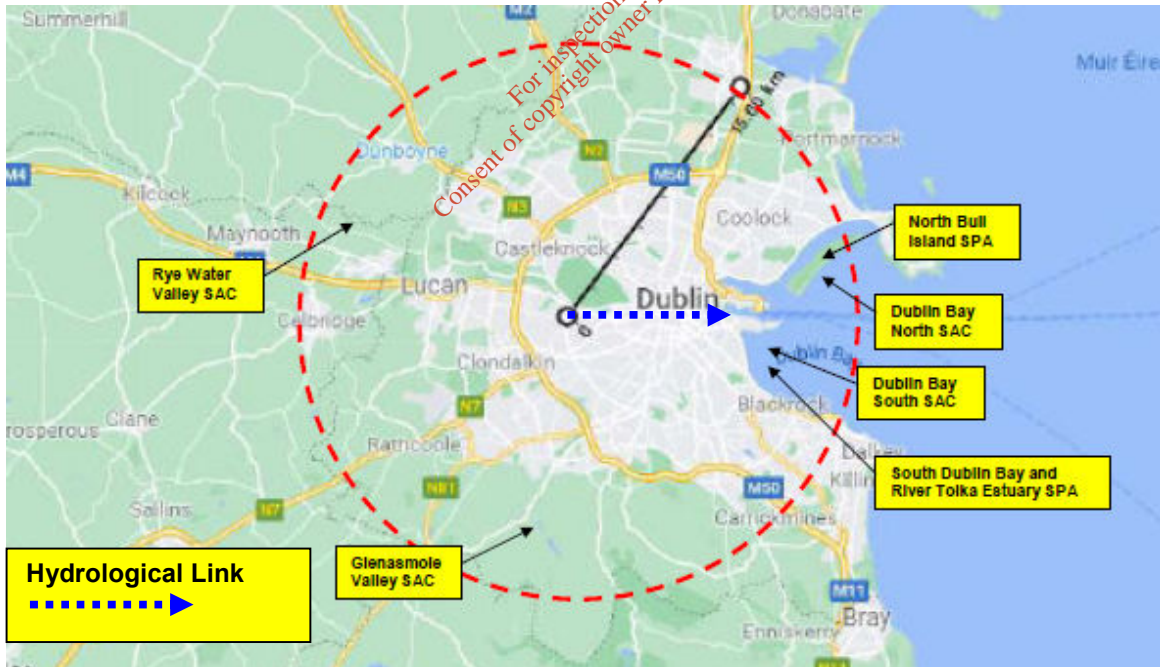


Figure 4: Zone of Influence (15Km) for SRCL facility

Table 1 below details Natura 2000 locations versus the Zone of Influence for the SRCL facility. The following information has been taken from Natura 2000 data forms, conservation objectives reports and site synopsis reports available from the National Parks and Wildlife Services website www.npws.ie

Natura 2000 Site	Site Code	Qualifying Interest (QIs) / Special Conservation Interests (SCIs)	Distance from SRCL	Zone of Influence
Rye Water Valley SAC	001398	Petrifying springs with tufa formation (Cratoneurion) [7220] Vertigo angustior (Narrow-mouthed Whorl Snail) [1014] Vertigo moulinsiana (Desmoulin's Whorl Snail) [1016]	14Km	No. There is no hydrological link between this SAC and the SRCL facility.
Glenasmole Valley SAC	001209	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] Petrifying springs with tufa formation (Cratoneurion) [7220]	13Km	No. There is no hydrological link between this SAC and the SRCL facility.
Dublin Bay South SAC	000210	Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Embryonic shifting dunes [2110]	6Km	Yes. There is a hydrological link with SRCL and this SAC.

Natura 2000 Site	Site Code	Qualifying Interest (QIs) /Special Conservation Interests (SCIs)	Distance from works	Zone of Influence
Dublin Bay North SAC	000206	Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] Petalophyllum ralfsii (Petalwort) [1395]	8 Km	Yes. There is a direct hydrological link between SRCL and this SAC.

Natura 2000 Site	Site Code	Qualifying Interest (QIs) / Special Conservation Interests (SCIs)	Distance from works	Zone of Influence
South Dublin Bay and River Tolka Estuary SPA	004024	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Redshank (<i>Tringa totanus</i>) [A163] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Wetland and Waterbirds [A999]	6 Km	Yes. There is a direct hydrological link between SRCL and this SAC.

Natura 2000 Site	Site Code	Qualifying Interest (QIs) / Special Conservation Interests (SCIs)	Distance from works	Zone of Influence
North Bull Island SPA	004006	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Teal (<i>Anas crecca</i>) [A052] Pintail (<i>Anas acuta</i>) [A054] Shoveler (<i>Anas clypeata</i>) [A056] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Wetland and Waterbirds [A999]	8 Km	Yes. There is a direct hydrological link between SRCL and this SAC.

Table 1: Natura 2000 sites in the Zone of Influence for proposed works on Lough Gill

4.2 Details of Natura 2000 Sites with the Zone of Influence

4.2.1 Dublin Bay South SAC

Location: N 53.3235, W -6.18778

Site Code: 000210

Main Conservation Objective:

To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.

Favourable conservation status of a habitat is achieved when:

- Its natural range, and area it covers within that range, are stable or increasing, and;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and,
- The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and,
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Qualifying Interests and Current Conservation Status:

- Mudflats and sandflats not covered by seawater at low tide [1140]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- Annual vegetation of drift lines [1210]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- Salicornia and other annuals colonising mud and sand [1310]. The overall conservation status is Favourable (NPWS Article 17 Report on Habitats, 2019).
- Embryonic shifting dunes [2110]. The overall conservation status is Favourable (NPWS Article 17 Report on Habitats, 2019).

Site Characteristics: This intertidal site extends from the South Wall at Dublin Port to the West Pier at Dun Laoghaire, a distance of c. 5 km. At their widest, the intertidal flats extend for almost 3 km. The seaward boundary is marked by the low tide mark, while the landward boundary is now almost entirely artificially embanked. Several permanent channels exist, the largest being Cockle Lake. A small sandy beach occurs at Merrion Gates, while some bedrock shore occurs near Dun Laoghaire. A number of small streams and drains flow into the site. The proximity of the site to Dublin City results in it being a very popular recreational area. It is also important for educational and research purposes. (NPWS Site Synopsis, Dublin Bay South SAC, NF000210)

Site Quality and Importance: Site possesses a fine and fairly extensive example of intertidal flats. Sediment type is predominantly sand, with muddy sands in the more sheltered areas. A typical macro-invertebrate fauna exists. Has the largest stand of *Zostera* on the east coast. Supports part of the important wintering waterfowl populations of Dublin Bay. Regularly has an internationally population of *Branta bernicla horta*, plus nationally important numbers of at least a further 6 species, including *Limosa lapponica*. Regular autumn roosting ground for significant numbers of *Sterna* terns, including *S. dougallii*. The scientific interests of the site have been well documented. (NPWS, Natura 2000 Standard Data Form, Dublin Bay South SAC, NF000210)

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4.2.2 Dublin Bay North SAC

Location: N 53.3687, W -6.13583

Site Code: 000206

Main Conservation Objectives:

To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SPA has been selected.

Favourable conservation status of a habitat is achieved when:

- a) Its natural range, and area it covers within that range, are stable or increasing, and;
- b) The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and,
- c) The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- a) Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and;
- b) The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and,
- c) There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Qualifying Interests and Current Conservation Status:

- Mudflats and sandflats not covered by seawater at low tide [1140]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- Annual vegetation of drift lines [1210]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- Salicornia and other annuals colonising mud and sand [1310]. The overall conservation status is Favourable (NPWS Article 17 Report on Habitats, 2019).
- Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- Mediterranean salt meadows (*Juncetalia maritimi*) [1410]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- Embryonic shifting dunes [2110]. The overall conservation status is Favourable (NPWS Article 17 Report on Habitats, 2019).
- Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes) [2120]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]. The overall conservation status is Unfavourable/Bad (NPWS Article 17 Report on Habitats, 2019).

- Humid dune slacks [2190]. The overall conservation status is Unfavourable/Inadequate (NPWS Article 17 Report on Habitats, 2019).
- *Petalophyllum ralfsii* (Petalwort) [1395]. The overall conservation status is Favourable. (NPWS Article 17 Report on Species, 2019).

Site Characteristics: The North Bull Island sand spit is a relatively recent depositional feature, formed as a result of improvements to Dublin Port during the 18th and 19th centuries. It is almost 5km long and 1km wide and runs parallel to the coast between Clontarf and Sutton. The sediment which forms the island is predominantly glacial in origin and siliceous in nature. Between the island and the mainland there occurs two sheltered intertidal areas which are separated by a solid causeway constructed in 1964. The seaward side of the island has a fine sandy beach. A substantial area of shallow marine water is included in the site. The interior of the island is excluded from the site as it has been converted to golf courses. The proximity of the North Bull Island to Dublin City results in it being a very popular recreational area. It is also very important for educational and research purposes. Nature conservation is a main land use within the site (NPWS Site Synopsis, Dublin Bay North SAC, NF000206)

Site Quality and Importance: Site possesses an excellent diversity of coastal habitats. The North Bull Island dune system is one of the most important systems on the east coast and is one of the few in Ireland that is actively accreting. It possesses extensive and mostly good quality examples of embryonic, shifting marram and fixed dunes, as well as excellent examples of humid dune slacks. Both Atlantic and Mediterranean salt marshes are well represented and a particularly good marsh zonation is shown. The salt marshes grade into mudflats and sandflats, some of which are dominated by annual *Salicornia* species. *Petalophyllum ralfsii* occurs at its only known station away from the western seaboard. The site has five Red Data Book vascular plant species and four Red Data Book bryophyte species. This is one of the most important sites for wintering waterfowl in Ireland, with internationally important populations of *Branta bernicla horta*, *Calidris canutus* and *Limosa lapponica*, plus nationally important numbers of a further 14 species. 20% of the national total of *Pluvialis squatarola* occurs here. Formerly it had important colony of *Sterna albifrons*. North Dublin Bay is nationally important for three insect species. The scientific interests of the site have been well documented and future prospects are good owing to the various designations assigned to site (NPWS, Natura 2000 Standard Data Form, Dublin Bay North SAC, NF000206)

4.2.3 South Dublin Bay and River Tolka Estuary SPA

Location: N 53.3666, W -6.1318

Site Codes: 0004024

Main Conservation Objectives:

To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SPA has been selected.

Favourable conservation status of a habitat is achieved when:

- a) Its natural range, and area it covers within that range, are stable or increasing, and;
- b) The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and,
- c) The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- a) Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and;
- b) The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and,
- c) There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Special Conservation Interests and Conservation Status:

- Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]. Amber List (Medium conservation concern)
- Oystercatcher (*Haematopus ostralegus*) [A130]. Amber List (Medium conservation concern)
- Ringed Plover (*Charadrius hiaticula*) [A137]. Amber List (Medium conservation concern)
- Grey Plover (*Pluvialis squatarola*) [A141]. Amber List (Medium conservation concern)
- Knot (*Calidris canutus*) [A143]. Amber List (Medium conservation concern)
- Sanderling (*Calidris alba*) [A144]. Amber List (Medium conservation concern)
- Dunlin (*Calidris alpina*) [A149]. Red List (High conservation concern)
- Bar-tailed Godwit (*Limosa lapponica*) [A157]. Amber List (Medium conservation concern)
- Redshank (*Tringa totanus*) [A162]. Red List (High conservation concern)
- Black-headed Gull (*Chroicocephalus ridibundus*) [A179]. Red List (High conservation concern)
- Roseate Tern (*Sterna dougallii*) [A192]. Amber List (Medium conservation concern)

- Common Tern (*Sterna hirundo*) [A193]. Amber List (Medium conservation concern)
- Arctic Tern (*Sterna paradisaea*) [A194]. Amber List (Medium conservation concern)
- Wetland and Waterbirds [A999]

Site Characteristics: This site comprises a substantial part of Dublin Bay. It includes virtually all of the intertidal area in the south bay, as well as much of the Tolka Estuary to the north of the River Liffey. A portion of the shallow bay waters is also included. In the south bay, the intertidal flats extend for almost 3 km at their widest. The sediments are predominantly well-aerated sands. The sands support the largest stand of *Zostera noltii* on the East Coast. Several permanent channels exist, the largest being Cockle Lake. A small sandy beach occurs at Merrion Gates, while some bedrock shore occurs near Dun Laoghaire. The landward boundary is now almost entirely artificially embanked. Sediments in the Tolka Estuary vary from soft thixotropic muds with a high organic content in the inner estuary to exposed, well aerated sands off the Bull Wall. The proximity of the site to Dublin City results in it being a very popular recreational area. It is also important for educational and research purposes. (NPWS Site Synopsis, South Dublin Bay and River Tolka Estuary SPA, NF004024)

Site Quality and Importance: The site possesses extensive intertidal flats which support wintering waterfowl which are part of the overall Dublin Bay population. It regularly has an internationally important population of *Branta bernicla hrota*, which feeds on *Zostera noltii* in the autumn. It has nationally important numbers of a further 6 species: *Haematopus ostralegus*, *Charadrius hiaticula*, *Calidris canutus*, *Calidris alba*, *Calidris alpina* and *Limosa lapponica*. It is an important site for wintering gulls, especially *Larus ridibundus* and *Larus canus*. South Dublin Bay is the premier site in Ireland for *Larus melanocephalus*, with up to 20 birds present at times. Is a regular autumn roosting ground for significant numbers of terns, including *Sterna dougallii*, *S. hirundo* and *S. paradisaea* (NPWS, Natura 2000 Standard Data Form, South Dublin Bay and River Tolka Estuary SPA, NF004024)

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4.2.4 North Bull Island SPA

Location: N 53.3666, W -6.13181

Site Codes: 0004006

Main Conservation Objectives:

To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SPA has been selected.

Favourable conservation status of a habitat is achieved when:

- a) Its natural range, and area it covers within that range, are stable or increasing, and;
- b) The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and,
- c) The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- a) Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and;
- b) The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and,
- c) There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Special Conservation Interest and Conservation Status:

- Light-bellied Brent Goose (*Branta bernicla hrota*) [A046]. Amber List (Medium conservation concern)
- Shelduck (*Tadorna tadorna*) [A048]. Amber List (High conservation concern)
- Teal (*Anas crecca*) [A052]. Amber List (Medium conservation concern)
- Pintail (*Anas acuta*) [A054]. Red List (High conservation concern)
- Shoveler (*Anas clypeata*) [A056]. Red List (High conservation concern)
- Oystercatcher (*Haematopus ostralegus*) [A130]. Amber List (Medium conservation concern)
- Golden Plover (*Pluvialis apricaria*) [A140]. Red List (High conservation concern).
- Grey Plover (*Pluvialis squatarola*) [A141]. Amber List (Medium conservation concern)
- Knot (*Calidris canutus*) [A143]. Amber List (Medium conservation concern)
- Sanderling (*Calidris alba*) [A144]. Amber List (Medium conservation concern)
- Dunlin (*Calidris alpina*) [A149]. Red List (High conservation concern)
- Black-tailed Godwit (*Limosa limosa*) [A156]. Amber List (Medium conservation concern)

- Bar-tailed Godwit (*Limosa lapponica*) [A157]. Amber List (Medium conservation concern)
- Curlew (*Numenius arquata*) [A160]. Red List (High conservation concern)
- Redshank (*Tringa totanus*) [A162]. Red List (High conservation concern)
- Turnstone (*Arenaria interpres*) [A169]. Amber List (Medium conservation concern)
- Black-headed Gull (*Chroicocephalus ridibundus*) [A179]. Red List (High conservation concern)
- Wetland and Waterbirds [A999]

Site Characteristics: The North Bull Island sand spit is a relatively recent depositional feature, formed as a result of improvements to Dublin Port during the 18th and 19th centuries. It is almost 5km long and 1km wide and runs parallel to the coast between Clontarf and Sutton. The sediment which forms the island is predominantly glacial in origin and siliceous in nature. A well-developed dune system runs the length of the island, with good examples of embryonic, shifting marram and fixed dunes, as well as excellent examples of humid dune slacks. Extensive salt marshes also occur. Between the island and the mainland occur two sheltered intertidal areas which are separated by a solid causeway constructed in 1964. The seaward side of the island has a fine sandy beach. A substantial area of shallow marine water is included in the site. Part of the interior of the island has been converted to golf courses. The proximity of the North Bull Island to Dublin City results in it being a very popular recreational area. It is also very important for educational and research purposes. Nature conservation is a main landuse within the site. (NPWS Site Synopsis, North Bull Island SPA, NF004006)

Site Quality and Importance: The site is among the top ten sites for wintering waterfowl in the country. It supports internationally important populations of *Branta bernicla hrota* and *Limosa lapponica* and is the top site in the country for both of these species. A further 14 species have populations of national importance, with particular notable numbers of *Tadorna tadorna* (8.5% of national total), *Anas acuta* (11.6% of national total), *Pluvialis squatarola* (6.9% of national total), *Calidris canutus* (10.5% of national total). North Bull Island SPA is a regular site for passage waders such as *Philomachus pugnax*, *Calidris ferruginea* and *Tringa erythropus*. The site supports *Asio flammeus* in winter. Formerly the site had an important colony of *Sterna albifrons* but breeding has not occurred in recent years. The site provides both feeding and roosting areas for the waterfowl species. Habitat quality for most of the estuarine habitats is very good. The site has a population of the rare *Petalophyllum ralfsii* which is the only known station away from the western seaboard as well as five Red Data Book vascular plant species and four bryophyte species. It is nationally important for three insect species. Wintering bird populations have been monitored more or less continuously since the late 1960s, and the other scientific interests of the site have also been well documented. Future prospects are good owing to various designations assigned to site (NPWS, Natura 2000 Standard Data Form, North Bull Island SPA, NF004006)

4.3 Potential Impacts on Natura 2000 sites

Table 2 which follows, details the potential threats and impacts on the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) within the zone of influence of the SRCL facility on the Kylemore Road in Dublin.

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Natura 2000 Site	QI or SCI	Potential Impact	Significant (Yes/No)
Dublin Bay South SAC, No. 000210	<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Embryonic shifting dunes [2110]</p>	<p>The change to the waste acceptance schedule in EPA licence W0054-02 will not impact on the Qualifying Interests (QIs) or the Special Conservation Interests (SCIs) of Dublin Bay South SAC. The proposed changes will not result in an overall increase in the waste accepted on site. No change to site infrastructure or controls is proposed. Waste activities and operations will be limited to those permitted by the EPA.</p>	No
Dublin Bay North SAC, No. 000206	<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330]</p> <p>Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]</p> <p>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</p> <p>Humid dune slacks [2190]</p> <p><i>Petalophyllum ralfsii</i> (Petalwort) [1395]</p>	<p>The change to the waste acceptance schedule in EPA licence W0054-02 will not impact on the Qualifying Interests (QIs) or the Special Conservation Interests (SCIs) of Dublin Bay South SAC. The proposed changes will not result in an overall increase in the waste accepted on site. No change to site infrastructure or controls is proposed. Waste activities and operations will be limited to those permitted by the EPA.</p>	No

Natura 2000 Site	QI or SCI	Potential Impact	Significant (Yes/No)
South Dublin Bay and River Tolka Estuary SPA, No. 004024	Light-bellied Brent Goose (Branta bernicla hrota) [A046] Oystercatcher (Haematopus ostralegus) [A130] Ringed Plover (Charadrius hiaticula) [A137] Grey Plover (Pluvialis squatarola) [A141] Knot (Calidris canutus) [A143] Sanderling (Calidris alba) [A144] Dunlin (Calidris alpina) [A149] Bar-tailed Godwit (Limosa lapponica) [A157] Redshank (Tringa totanus) [A162] Black-headed Gull (Chroicocephalus ridibundus) [A179] Roseate Tern (Sterna dougalli) [A192] Common Tern (Sterna hirundo) [A193] Arctic Tern (Sterna paradisaea) [A194] Wetland and Waterbirds [A999]	The change to the waste acceptance schedule in EPA licence W0054-02 will not impact on the Qualifying Interests (QIs) or the Special Conservation Interests (SCIs) of Dublin Bay South SAC. The proposed changes will not result in an overall increase in the waste accepted on site. No change to site infrastructure or controls is proposed. Waste activities and operations will be limited to those permitted by the EPA.	No

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Natura 2000 Site	QI or SCI	Potential Impact	Significant (Yes/No)
North Bull Island SPA, No.004006	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046] Shelduck (<i>Tadorna tadorna</i>) [A048] Teal (<i>Anas crecca</i>) [A052] Pintail (<i>Anas acuta</i>) [A054] Shoveler (<i>Anas clypeata</i>) [A056] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Dunlin (<i>Calidris alpina</i>) [A149] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157] Curlew (<i>Numenius arquata</i>) [A160] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Wetland and Waterbirds [A999]	The change to the waste acceptance schedule in EPA licence W0054-02 will not impact on the Qualifying Interests (QIs) or the Special Conservation Interests (SCIs) of Dublin Bay South SAC. The proposed changes will not result in an overall increase in the waste accepted on site. No change to site infrastructure or controls is proposed. Waste activities and operations will be limited to those permitted by the EPA.	

Table 2: Assessment of Potential Impacts on relevant Natura 2000 sites

5.0 Existing Habitats at SRCL

The habitats at the SRCL waste facility and immediate surrounding area have been classified using the Fossitt habitat classification system and are detailed as follows:

BL3 Buildings and artificial surfaces – the concrete yard, the SRCL waste facility and adjacent commercial and industrial properties. This habitat type does not align with a priority EU Annex I habitat.

WS1 Scrub: The open ground between the SRCL facility and the Grand Canal is colonised in areas by shrubs, stunted trees, bushes and brambles. This habitat type does not align with a priority EU Annex I habitat.

ED4: Spoil and Bare Ground. The land that lies to the rear of the SRCL facility contains areas of spoil and bare ground. This habitat type does not align with a priority EU Annex I habitat.

ED3: Recolonised Bare Ground to the rear of the SRCL facility. This habitat type does not align with a priority EU Annex I habitat.

FW2: Depositing/Lowland rivers, The River Camac. This habitat type does not align with a priority EU Annex I habitat.

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6.0 Predicted Impacts and In-Combination Effects

Having identified the qualifying interests of Natura 2000 sites within the zone of influence for the SRCL waste facility an assessment for possible impacts posed by the proposed change to the waste acceptance schedule of EPA Waste Licence W0054-02 can be performed. See “Assessment of plans and projects significantly affecting Natura 2000 sites- Methodology guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission, 2001”.

Guidelines for Ecological Evaluation and Assessment from the Institute of Ecological and Environmental Management (IEEM) have been referred to in assessing the significance of the ecological and environmental impacts. The table below summarises the criteria for classifying ecological impacts.

Impact Magnitude	Definition
No change	No discernible change in the ecology of the affected feature.
Imperceptible Impact	A change in the ecology of the affected site, the consequences of which are strictly limited to within the development boundaries.
Minor Impact	A change in the ecology of the affected site which has noticeable ecological consequences outside the development boundary, but these consequences are not considered to significantly affect the distribution or abundance of species or habitats of conservation importance.
Moderate Impact	A change in the ecology of the affected site which has noticeable ecological consequences outside the development boundary. These consequences are considered to significantly affect the distribution and/or abundance of species or habitats of conservation importance.
Substantial Impact	A change in the ecology of the affected site which has noticeable ecological consequences outside the development boundary. These consequences are considered to significantly affect species or habitats of high conservation importance and to potentially affect the overall viability of those species or habitats in the wider area.
Major Impact	A change in the ecology of the affected site which has noticeable ecological consequences outside the development boundary. These consequences are considered to be such that the overall viability of species or habitats of high conservation importance in the wider area is under a very high degree of threat (negative impact) or is likely to increase markedly (positive impact).

Table 3: Categorising Ecological Impacts

6.1 Ecological and Environmental Impacts

The ecological impacts of the proposed change to EPA Waste Licence W0054-02 have been categorised using the criteria in Table 6.

Land-Take: There will be on land take from protected sites as a result of the proposed change to the waste schedule of EPA Waste Licence W0054-02. **No change to Natura 2000 sites**

Distance from Natura 2000 site or key features of the site: The SRCL facility is outside the boundary of Natura 2000 sites and the nearest Natura 2000 location is Dublin Bay South SAC which is six kilometres from SRCL. **No Change to Natura 2000 site**

Water: The proposed change to EPA Waste Licence W0054-02 will not impact on water quality. **No Change to Natura 2000 sites.**

Air Emissions: The proposed change to EPA Waste Licence W0054-02 will not result in air emissions or impact on air quality. **No Change to Natura 2000 sites.**

Noise: The proposed change to EPA Waste Licence W0054-02 will not result in an increase in noise levels on site at SRCL. Operations at SRCL are limited to permitted hours under W0054-02 with permitted boundary noise limits applying to site operations. **No Change to Natura 2000 sites.**

Reduction of Habitat: No significant loss of habitat will occur as a result of the proposed change to EPA Waste Licence W0054-02. **No Change to Natura 2000 sites.**

Disturbance to Key Species: There will be no disturbance to annexed species as a result of the proposed change to EPA Waste Licence W0054-02. **No Change to Natura 2000 sites.**

Habitat or Species Fragmentation: There will be no habitat or species fragmentation as a result of the proposed change to EPA Waste Licence W0054-02. **No Change to Natura 2000 sites.**

Reduction in Species Density: There will be no disturbance reduction in species density as a result of the proposed change to EPA Waste Licence W0054-02. **No Change to Natura 2000 sites.**

Changes in key indicators of conservation value: There will be no changes in key indicators of conservation value as a result of the proposed change to EPA Waste Licence W0054-02. **No Change to Natura 2000 sites.**

6.2 Consideration of In-Combination Effects

Potential in-combination effects of the proposed SRCL plan must be considered with potential impacts posed by other such plans and projects in the vicinity. A cumulative impact may result from incremental changes caused by another past, present or foreseeable future actions combined together with the proposed SRCL change to waste licence W0054-02.

The proposed change to the waste acceptance schedule of EPA Waste licence W0054-02 does not pose an environmental risk as there will be no change to the total volume of hazardous waste accepted on site and there are no changes to the site infrastructure at SRCL to facilitate the proposed changes to the SRCL waste schedule.

The River Camac receives stormwater from the SRCL facility as permitted by the EPA under waste licence W0054-02. This river is a hydrological link between the SRCL facility and Natura 2000 sites located in Dublin Bay. The River Camac flows through Dublin City and County and it is subject to many potential sources of pollution from commercial facilities and residential developments. We can also expect that stormwater from hardstand and roads adjacent to the River Camac will also impact on the water quality of this river.

The EC (2001) guidelines on the provision of Article 6 of the Habitats' Directive state that the phrase 'in combination with other plans or projects' in Article 3(3) of the Habitats Directive refers to the cumulative impacts due to plans or projects 'that are currently under consideration together with the effects of any existing or proposed projects or plans.'

Arterial Drainage Works may be carried out within the River Camac catchment by the public bodies such as the Office of Public Works and local authorities to mitigate flood risk. These works may include the removal of silt from watercourses and drains and also the removal of in-stream vegetation. Such works have the potential to impact on downstream water quality. The proposed change to the waste acceptance schedule of EPA Waste licence W0054-02 will not contribute to or have an in-combination effect with arterial drainage works on water quality.

Dublin City Council is reviewing the current Dublin City Development Plan 2016-2022 and preparing a new City Development Plan (the Plan) up to 2028. A review of the Strategic Environmental Assessment (SEA) for the Dublin City Development Plan 2016-2022 was performed. The SEA for this plan includes a commitment by Dublin City Council "to protect and where necessary improve the quality and management of watercourses and groundwater, in compliance with the requirements of all water and habitat based legislation including the River Basin Management Plan of the Eastern River Basin District and to achieve and maintain good status of all surface water bodies", including the River Camac. The proposed change to the waste acceptance schedule of EPA Waste licence W0054-02 will not impact on the water quality of the River Camac or contradict the objectives of the Dublin City Development Plan 2016-2022.

No In-Combination Impact on Natura 2000 sites.

7.0 AA Screening Conclusion

Under Article 6(3) and (4) of the Habitats Directive, a precautionary approach to the Appropriate Assessment screening of projects and works should be taken. To keep in line with this approach, all identified impacts posed by works are viewed as having the potential to be significant unless appropriate controls measures to reduce the potential impacts are implemented.

Following the completion of the appropriate assessment screening for the proposed change to the waste acceptance schedule of EPA Waste Licence W0054-02 and applying a precautionary principle, no impact on the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of Natura 2000 sites will occur as a result of the change proposed by SRCL to the waste acceptance schedule of W0054-02. The SRCL facility is EPA licensed and operates to a high level of compliance. No change in infrastructure is required on site to facilitate the proposed change to the waste schedule of EPA waste Licence W0054-02 and no further mitigation is required to control or limit the impact posed by site operations on Natura 2000 sites following the proposed change in the waste schedule.

Therefore a Stage 2 Appropriate Assessment (Natura Impact Statement) is not required in this case.

A no-effects summary report has been completed and accompanies this report as appendix 2.



David Kelly BSc. MSc.
Technical Manager
KD Environmental Ltd.

11th October 2021

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19. NPWS (2015) Conservation Objectives: South Dublin Bay and River Tolka Estuary SPA 004024. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

20. NPWS: Natura 2000 Standard Data Form South Dublin Bay and River Tolka Estuary SPA 004024, Updated 2020

21. 19. NPWS (2015) Conservation Objectives: North Bull Island SPA 004006. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht.

22. NPWS: Natura 2000 Standard Data Form North Bull Island SPA 004006, Updated 2020

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Appendix 1

SRCL submission to the EPA to change waste acceptance criteria of Waste Licence W0054-02

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19th July 2021

Via Eden submission

Re: Kylemore Road facility Licence Number W0054-02. Request to increase waste processing limit.

Dear Ms Noone / Ms O' Sullivan

As requested by the Agency please find outlined below additional information in support of our technical amendment request regarding Permit W0054-02

- *Clearly outline the requested increase being sought in terms of waste category and quantity having regard for Tables A.1/A.2 of your licence;*

Tables A.1 and A.2 below outline the current permitted quantities per waste type and the proposal.

Table A.1

WASTE TYPE	Current W54-02 (TONNES PER ANNUM)	Proposal
Used sharp instruments, Infected or potentially hazardous healthcare risk waste Laboratory waste	2,072	3,072
HEPA Filters, obsolete Mechanical Equipment, Surgical equipment	260	260
TOTAL	2,332	3,332

Table A.2

WASTE TYPE	Current W54-02 (TONNES PER ANNUM)	Proposal
Non Hazardous waste	500	500
Hazardous waste	9,025	8,025
TOTAL	9,525	8,525

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FS 678571 EMS 678570 OHS 678573

- provide confirmation that no increase in overall waste quantities is being sought;

We can confirm we are not requesting an increase in overall waste quantities at this time.

- provide details/supporting information as to why the quantity of hazardous healthcare waste being accepted at the facility in 2021 is in excess of that accepted in 2020

Waste volumes each week in Quarter 1 2021 exceeded those received at any period in 2020. This was a combination of a surge in hospitals admissions as a result of the pandemic, increased testing and the resumption of elective procedures. As can be seen in the table below, by week 15 2021, waste volumes were comparable to those received in 2020.

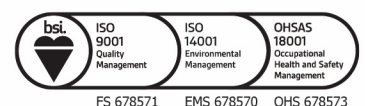
Kylemore process			
Week No	2019	2020	2021
1	8.58	2.17	0.15
2	7.96	6.76	69.38
3	7.46	7.63	100.69
4	8.29	11.36	93.51
5	8.31	9.91	89.01
6	9.49	10.50	98.55
7	9.30	13.17	88.18
8	9.59	12.43	79.25
9	10.29	13.48	64.51
10	9.58	11.69	71.64
11	8.71	18.61	67.66
12	7.34	13.24	51.47
13	8.39	39.84	60.40
14	9.21	46.08	64.31
15	10.95	48.89	43.34
16	9.30	48.14	41.00
17	9.89	45.15	38.00
18	9.10	45.96	40.00
19	9.14	54.09	34.00
20	7.92	61.57	33.00
21	9.15	56.12	42.00
22	7.66	49.57	37.00
23	7.01	37.63	33.00
24	7.25	33.64	22.00

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FS 678571 EMS 678570 OHS 678573

25	8.64	31.00	28.00
26	7.94	35.40	
27	6.58	31.11	
28	7.80	30.91	
29	7.17	27.29	
30	6.03	26.49	
31	6.06	25.62	
32	7.04	22.90	
33	6.02	20.46	
34	6.35	29.95	
35	6.76	29.56	
36	7.55	28.55	
37	7.78	44.45	
38	8.07	34.34	
39	6.84	33.47	
40	5.71	50.25	
41	6.08	51.03	
42	6.79	51.53	
43	7.44	59.58	
44	6.73	53.32	
45	7.41	50.91	
46	8.47	56.51	
47	7.29	63.23	
48	7.85	70.18	
49	8.71	58.75	
50	9.94	55.55	
51	10.57	65.95	
52	9.38	50.18	
53		32.69	
Total Processed	418.86	1918.72	1390.04
Availability quantity of limit remaining	1653.14	153.28	681.96

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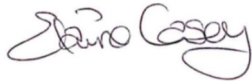
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FS 678571 EMS 678570 OHS 678573

Please could you advise if the EPA would be willing to issue a regulatory position statement for a temporary increase in the volumes of waste for 2021 that can be treated at the Kylemore Road facility to continue to manage the surge of waste volumes produced during the pandemic.

Kind Regards



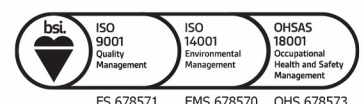
Elaine Casey
EHS Manager
0863459169

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Appendix 2

SRCL Licence Alteration Request EPA Screening

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Licence Alteration Request

Alteration Details	
Licence	W0054-02 SRCL Limited
Licensee	SRCL Limited
Title of Alteration	Increase in Operational Capacity

Screening Report

No.	Question	Answer
1	Does the proposed alteration require a new class of activity or process?	No
2	Does the proposed alteration cause a new / additional main emission point?	No
3	Does the proposed alteration increase the total specified emissions for any emission parameter? significantly ?	No
4	Does the proposed alteration increase significantly the overall total emission from the installation/facility?	No
5	Does the proposed alteration involve development or proposed development that has already been granted planning permission or requires a grant of planning permission and was/is subject to EIA by the Planning Authority or An Bord Pleanála?	No
6	Did the proposed alteration require the preparation of a Natura Impact Statement (NIS) for consideration by any Planning or Public Authority?	No
7	Does the proposed alteration indicate that the EPA should conduct an Appropriate Assessment (on foot of a screening for Appropriate Assessment)?	No
8	Does the proposed change conflict with BAT as set out in the relevant BAT Conclusions? See here	No
9	Does the proposed alteration adversely affect the energy efficiency of the installation/facility?	No
10	Does the proposed alteration adversely affect the environmental risk of the installation/facility significantly ?	No

Licence Alteration Request

11	Does the proposed alteration cause an increase above the capacity limitations specified in the licence?	No
12	Does the proposed alteration require an extension of operating hours (where controlled by the licence) for an installation/facility where the public is likely to have an interest in such an extension?	No
13	Does the proposed alteration involve the incineration or co-incineration of waste materials displaying hazardous properties that were not previously authorised (as per the WID/IED)?	No
14	Does the proposed alteration introduce materials or techniques which adversely alter the probability, magnitude and duration or complexity of the site transboundary impact?	No
15	Does the proposed alteration constitute a substantial change?	No
16	Does the proposed alteration regularise an on-going breach of a licence condition?	No
17	Does the proposed alteration require a change to a condition or schedule of the Licence?	Yes

Recommendation

Based on your responses to the forgoing questions the recommended option is for you to submit a 'Request Licence Amendment' for this proposed alteration.

To submit this request to the EPA you should locate it in the 'Request Alteration' area in LMA. Click on 'Proceed' against this saved request, and then click on the 'Request Licence Amendment' button (in STEP 2 of the process). Then you will be required to provide more detailed information about your proposed amendment.

Note: The responses you have provided in this Screening Report will form part of the information record if you decide to proceed with this alteration request.

Recommendation Date: 23/09/2021

Appendix 3

SRCL Appropriate Assessment Screening No Effects Summary Report

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Details of project	
Name and Location of the NATURA 2000 sites	1) Dublin Bay South SAC No. 000210 2) Dublin Bay North SAC No. 000206 3) South Dublin Bay & River Tolka Estuary SPA No. 004024 4) North Bull Island SPA No. 004006
Description of the Project	Appropriate Assessment Screening: Change to waste acceptance schedule for EPA Waste Licence W0054-02 granted to SRCL for its facility at Kylemore Road, Ballyfermot, Dublin 10.
Is the Project directly connected with the management of the NATURA 2000 site?	No, works are outside of protected areas but within 15Km
Details of any other projects or plans that together with this project could affect the Natura 2000 site	None
The assessment of significant effects	
Describe how the project is likely to affect the NATURA 2000 site	No effect to SAC or SPA is expected.
Response to consultation	N/A
Data collected to carry out the assessment	
Who carried out the assessment	David Kelly BSc. MSc. , KD Environmental Ltd
Sources of data	NPWS website, standard data form, conservation objectives data, SRCL information for the proposed change, review of Irish and European legislation.
Explain why the effects are not considered significant	1. No increase in total hazardous waste accepted volumes 2. No infrastructural changes required 3. Site operates to meet requirements of EPA waste licence W0054-02
Level of assessment completed	Stage 1 Screening
Where can full results be accessed and reviewed	Full report sent to SRCL and will be forwarded by SRCL to the EPA

Overall conclusions
<p>The proposed works have been reviewed and it has been concluded that there are no potential effects on annexed species and habitats within a 15Km Zone of Influence.</p> <p>The change to the waste acceptance schedule in EPA licence W0054-02 will not impact on the Qualifying Interests (QIs) or the Special Conservation Interests (SCIs) of Natura 2000 sites. The proposed change will not result in an overall increase in the waste accepted on site. No change to site infrastructure or controls is proposed. Waste activities and operations will be limited to those permitted by the EPA.</p>



David Kelly BSc. MSc.
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KD Environmental Ltd.

11th October 2021

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