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Environmental Licensing Programme
Office of Environmental Sustainability

6th March 2023

Licence review Starrus Eco Holdings Limited for an installation located at Sarsfieldcourt Industrial Estate, Sarsfieldcourt, Glanmire, Cork (Reg. No.: W0136-04)

Dear Sir/Madam,

I refer to the Notice of 28th February 2023 in relation to the above licence review and the Agency's determination that the newspaper and site notices are not in compliance with the Environmental Protection Agency (Industrial Emissions)(Licensing)(Amendment) Regulations 2020, as the address of the organisation in the public notices is the site address and not the same as in the application form.

Regulation 5 (a) of the Environmental Protection Agency (Industrial Emissions)(Licensing) Regulations 2013 (SI No 137 of 2013) requires a newspaper notice to give the name and address of the applicant. Regulation 6(3)(a) requires a site notice to state the name and address of the applicant. These requirements are also listed in the Agency's Guidance for Guidance for Industrial Emissions licence applicants regarding newspaper and site notices.

It is my understanding of the Regulations that the applicant's address relates to the location of the licensable activity, to ensure the public is fully informed and to be consistent with the details of the location of the licensable activity on the cover of the Licence. The applicant's site address has been included in in all previous public notices submitted with licence and licence review applications, which up to now have been accepted by the Agency.

The current IE application form requires details of the registered address of the organization making the application. I have reviewed the Environmental Protection Agency (Industrial Emissions)(Licensing)(Amendment) Regulations 2020 and cannot see any amendment to Regulation 5 (a) and Regulation 6 (3)(a) of the 2012 Regulations (Principal Regulations) stipulating that the applicant's address to be provided in the public notices must be the applicant's registered address.

I would appreciate if you could advise me as to where the Principal Regulations have been amended to require, in the case of an applicant being an incorporated entity, the inclusion of the applicant's registered address in the public notices, or if this new requirement is on foot of case law/legal advice.

Yours Sincerely,



Jim O'Callaghan

22-138-02

March 2023 (JOC/CM)