

Environmental Licensing Programme  
Office of Environmental Sustainability  
EPA  
Via EDEN

Cc Ossian Smyth TD Minister for State for the Circular Economy

28<sup>th</sup> of April, 2023

**Ref W0261-03**

**Section 87(3) of EPA Act 1992 as amended in respect of licence review from Starrus Eco Holdings Limited for an installation located at Cappagh Road, Finglas, Dublin 11**

Dear Sir/Madam,

We note the Agency's request, dated the 27<sup>th</sup> of April, for our consent to extend the appropriate period by which the Agency must issue a proposed determination to the 15<sup>th</sup> of July, 2023.

On behalf of SEHL we agree to this time extension request. However, we wish to place the following comments on record: -

1. The application for Cappagh was made to the Agency on the 9<sup>th</sup> of November 2021, a full 18 months ago, and we are therefore very disappointed with the lack of progress.
2. The primary role of the Cappagh facility is to process waste in order to divert it away from disposal/export for disposal and towards indigenous resource recovery.
3. The application is very narrow in scope; i.e. it is limited to seeking an increase in capacity and an extension in operating hours, at an existing licensed and operating facility. There are no new emission points, no new activities and no new materials.

4. It is SEHL's view that the Agency should be in a position to decide on most review licence applications within 6 months. Taking greater than 6 months to issue a proposed determination is, in our view, unreasonable and significantly undermines the ability of industry to provide essential services to the State, adapt to changing market conditions, and serve the needs of our customers. We respectfully request that the Agency ensures that it allocates appropriate resources to the Environmental Licensing Programme in order to ensure that review applications can be determined within a 6 month timeline.
5. The Cappagh facility serves domestic waste customers in the Eastern Region, an area with significant waste processing capacity constraints and a growing population.
6. This licence review application relates to a strategic infrastructure development application. Therefore, SEHL has already demonstrated to the satisfaction of An Bord Pleanála, that the development is essential national infrastructure.

We respectfully request that the Agency prioritises this application and delivers a PD by the 15<sup>th</sup> of July of this year.

Yours sincerely,



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David Tobin  
Sustainability and Circular Economy Director

On behalf of SEHL

