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**From:** Robert.OShea@ibec.ie [mailto:Robert.OShea@ibec.ie]

**Sent:** 29 September 2008 15:14

**To:** Jonathan Derham

**Subject:** National Consultation in respect of an EPA Proposed Municipal Solid Waste Pre-Treatment and Residual Management initiative

Jonathan

**Re: National Consultation in respect of an EPA Proposed Municipal Solid Waste Pre-Treatment and Residual Management initiative**

At the September general meeting of the Irish Waste Management Association (IWMA) the recently published Consultation Draft Document on this issue was discussed. The attached letter outlines the concerns raised among members. The IWMA is anxious to meet with the Agency to discuss this important issue and have requested a meeting as soon as possible. I look forward to meeting with you at a convenient date.

If you have any queries please contact me at the number below.

Regards

Rob

*(See attached file: EPA 29th Sept 08.pdf)*

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01/10/2008



Dr. Jonathan Derham  
Licensing Unit  
Office of Climate, Licencing & Resource Use  
Environmental Protection Agency  
PO Box. 3000  
Johnstown Castel Estate  
Wexford

29<sup>th</sup> September 2008

**Re: National Consultation in respect of an EPA Proposed Municipal Solid Waste Pre-Treatment and Residual Management initiative**

Dear Jonathon,

At the September general meeting of the Irish Waste Management Association (IWMA) the recently published Consultation Draft Document on Pre-treatment and Residuals Management of Municipal Solid Waste was discussed. Some members had received correspondence earlier regarding this initiative.

Whilst members welcome the initiative they identified this as a highly critical issue for the industry and one that requires in-depth consultation between the Agency and a number of bodies including the private waste management sector. The subsequent licence review suggested will have enormous implications for existing licence holders and for those planning to provide the infrastructure that will ultimately determine whether Ireland meets its landfill directive obligations.

IWMA members raised two particular issues. First, the deadline for receipt of comments of Monday October 13<sup>th</sup> is inadequate for full detailed consultation as required by such an important issue. We respectfully request consideration of a 6-8 week consultation period to allow for the preparation of detailed submissions.

Second, further details of the process that will follow this initial consultation are required. In particular, it is unclear whether consultation is limited to provision of comments on the initial Consultation Draft. There appears to be confusion based on the Consultation Draft and letters forwarded to IWMA members from the Agency as to whether a decision has already been taken to review waste licences.

The IWMA respectfully requests that as part of the consultation process, a meeting is convened between key Agency staff and a small IWMA delegation. I confirm that we are available to attend such a meeting at short notice in Dublin or in Agency Headquarters.

Kind Regards,  
Regards,



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Robert O'Shea  
Secretary  
IWMA