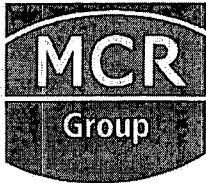


Sub ④



Head Office:

1 The Capel Building,
Dublin 7.
t +353 (1) 889 9100
f +353 (1) 481 1500

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

9th October 2008.

Re: Municipal Solid Waste – Pre-treatment & Residuals Management

Dear Dr. Derham,

Further to your request for feedback in relation to the above referenced document, I wish to make the following comments on behalf of MCR Environmental (registered business name of MCR Personnel Ltd.).

Overview of MCR Environmental

MCR Environmental is a member of both the Irish Waste Management Association and the Composting Association of Ireland (Crē). The company began collecting waste in May 2007 and currently has a fleet of 6 waste collection vehicles, which is expected to grow exponentially over the next few years. The current fleet consists of hook loaders and skip lorries, designed to collect construction and demolition (C&D) wastes. The company intends to purchase a range of vehicle types to facilitate the collection of commercial and industrial (C&I) wastes in addition to the C&D wastes.

Five waste collection permits have been issued to MCR:

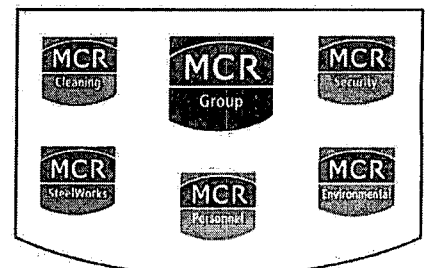
- Dublin Region (CP D/947/7)
- County Wicklow (WCP/WW/493/07A)
- County Kildare (WCP/KE/445C/07B)

www.mcrgroup.ie

Directors: Douglas Taylor, Managing Director, Kealan Turley, Deputy Managing Director, Donall Barrett, Sales Director, John Sheehan FCCA, Financial Director, Philip Carr, Operations Director.

Company Registration No: 279514 Vat No IE 8279514L

MCR Group is a business name of MCR Personnel Ltd.



- Northeast Region (Meath, Louth, Cavan, Monaghan) (WCP MH/2007/53/B)
- Midlands Region (Offaly, Laois, Longford, Westmeath, North Tipperary) (WCP 535/OY/615/08)

The company intends to develop a number of facilities including a proposed Materials Recovery Facility, a Mechanical Biological Treatment plant and a landfill for residual waste. These facilities are currently at different stages of the planning and licensing processes. A number of small regional recycling facilities that will allow the company provide a comprehensive and national recycling service are envisaged but not planned at this stage. MCR aims to handle c.400,000 tonnes of waste per annum by 2011. This will be comprised of waste collected by the company's own fleet of vehicles and waste delivered to MCR's facilities by third parties.

The company is confident that it can achieve the following targets by 2011.

- 90% recovery rate for Construction & Demolition wastes
- 70% recovery rate for Commercial & Industrial wastes
- 60% recovery rate for mixed municipal wastes
- 95% recovery for dry recyclables

Comments on the Consultation Draft

In general terms we agree with the proposals contained in your consultation document. The diversion of biodegradable waste from landfill represents the biggest challenge to the waste industry and those that regulate us. To date, landfill operators in Ireland have had no incentive to pre-treat black bin waste and no restrictions on acceptance of untreated municipal waste.

Odour remains the biggest problem at well-managed landfill sites and pre-treatment of all waste prior to landfill disposal offers the best solution to this problem. The degree to which waste should be pre-treated prior to landfill disposal should represent the best practical environmental option. It is argued by the waste industry in Germany that the stabilisation standard set by the German Government is too strict and requires too much energy at MBT plants. They claim that the waste reaches 80% of the target relatively quickly, but the energy used to reach the target is not justified in terms of a full energy and environmental audit. I note that the stabilisation level suggested in your consultation draft is not as stringent as the German Standard and we welcome this.

In order to meet the requirements of the EU Landfill Directive, the waste industry in Ireland needs to develop a suite of infrastructure that could be made up of MBT, incineration, pyrolysis,

gasification, composting and anaerobic digestion, amongst others. The viability of all of these technologies is questionable in the Irish situation due to the following factors:

- our relatively low population density,
- our free market for waste collection,
- the relatively unrestricted access to landfill,
- our relatively low landfill levy,
- the global financial crisis,
- a lack of standards for recovered products such as compost, aggregates, etc.
- the haphazard regionalisation of waste management,
- the waste collection permitting system, and
- the animal by-products licensing system.

Clearly, this EPA initiative cannot address all of these issues, but it is important to understand the full picture when making changes of the nature proposed in the consultation draft. In most EU countries, municipal waste services are paid for through local tax rather than directly to the service provider, so the municipalities have control of the waste and the funding for infrastructure. The situation in Ireland is quite different and we need different solutions to fulfil our requirements.

The EPA can contribute to encouraging development of these technologies by:

- Restricting access of certain waste types to landfill, particularly biodegradable waste.
- Introducing standards for recovered materials such as compost and aggregates. In particular, the EPA should consider the role for Compost Like Outputs from MBT processes. We suggest that standardisation of this potential product would allow recovery as landfill cover, mine tailings cover, motorway verges, etc. rather than disposal as stabilised bio-waste or bio-stabilised waste.
- Recognising the need for economies of scale for facilities, irrespective of regional waste management boundaries.
- Taking control of the waste collection permitting system, by introducing a less onerous national system that protects against illegal dumping and illegal export of waste without creating unnecessary burdens for business. The current system is overly onerous and

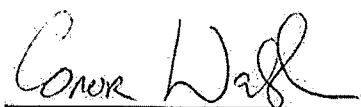
potentially gives the local authorities power to direct waste to facilities in a way that could jeopardise the viability of other facilities.

- Taking control of Animal By-products licensing at sites where a waste licence is required. The Department of Agriculture is not helping the development of the composting industry in Ireland by applying rules that are more stringent and restrictive than those applied in mainland Europe under the same EU Regulations.

We ask that the EPA consider these issues in the context of this initiative. In the current climate of recession and uncertainty with the global financial markets, the waste industry is less likely to take financial risks with the provision of infrastructure. The EPA, where possible, must put measures in place that provide certainty to investors over the medium term. Over-capacity of landfill void space is not a problem if there are adequate restrictions on the type and nature of waste that can be disposed to landfill. In this scenario, unused landfill capacity can be stored for the future and should not be considered a threat to recovery or pre-treatment infrastructure. The proposals contained in the consultation draft are welcome in this context.

I hope the above comments prove useful and I would welcome any further opportunity to engage in this process.

Yours truly,



Conor Walsh

Technical Advisor

MCR Environmental

086-8337573

conor.walsh@mcr.ie