

“Municipal Solid Waste - Pre-treatment & Residuals Management”

Listed below are Engineers Ireland’s comments in respect of the EPA consultation document “Municipal Solid Waste – Pre-treatment and Residuals Management”:

- (i) There is no clear reference in the document to the fact that waste treated in Waste to Energy Plants will be deemed Waste Recovery in the future provided the process meets the efficiency standards set out in the changes to the Directive. On Page 11 the document states *“There are no MSW Incinerators operational in Ireland (two have operating licences but have not yet commenced). This pre-treatment document also establishes pre-treatment obligations for such incineration plants when operational”*. Surely the EPA licence requirements should differ depending on whether the incineration process is deemed recovery or disposal?

- (ii) On page 17 *“Pre-incineration biological treatment of residual waste is not mandatory and would be decided on a case-by-case basis having regard to the environmental and economic efficiency of the proposal”*. The purpose of this requirement is unclear, and, moreover is totally unacceptable as prospective licensees proposing major investments will not know what is required until after the licence is issued. At that stage, the proponent will have made significant investment in a project that, depending on what is decided by the EPA, may be unviable both financially and practically (as it is now dependent

on the availability of biological treatment facilities outside the control of the proponent of the waste to energy facility).

- (iii) On page 15, with respect to the minimum pre-treatment requirements for waste going to landfill, the requirement to treat black bin waste for urban areas is unclear as there is no description/ definition of what constitutes an urban area.
- (iv) Is the minimum requirement to have a two bin system achievable in sparsely populated rural areas?

Engineers Ireland would be happy to discuss the above comments with the EPA in greater detail.

To arrange a meeting or telephone call on the subject, please contact:

Roberta Feely

Sector Support Manager

Engineers Ireland

T: +353 (0)1 6651341 / E: rfeely@engineersireland.ie