

PROPOSED NATIONAL HAZARDOUS WASTE MANAGEMENT PLAN - EXECUTIVE SUMMARY

The Environmental Protection Agency has published this *Proposed National Hazardous Waste Management Plan* for the period 2008 to 2012. The Proposed Plan sets out the priorities *proposed* to be pursued over the next five years and beyond to improve the management of hazardous waste in the Republic of Ireland. The objectives of the Plan are:

1. To reduce the generation of hazardous waste by industry and society generally.
2. To minimise unreported hazardous waste with a view to reducing the environmental impact of this unregulated waste stream.
3. To strive for increased self-sufficiency in the management of hazardous waste and to reduce hazardous waste export.
4. To minimise the environmental, social and economic impacts of hazardous waste generation and management.

The Plan is made under section 26 of the Waste Management Acts, 1996 to 2007. It is a public consultation document and written submissions are welcome by 31 January 2008. An Environmental Report is also published for consultation with the Proposed Plan as part of the required Strategic Environmental Assessment process.

Hazardous waste generation and management

The largest quantity of hazardous waste is generated by Irish industry and includes such materials as industrial solvents, waste oils, industrial sludges and chemical wastes. Households, small business, farms and the healthcare and construction sectors also generate large quantities of hazardous waste including batteries, electrical equipment, healthcare risk waste, solvent based paint and varnish waste, sheep dip and fluorescent lamps.

The quantity of hazardous waste generated in 2006 was 284,184 tonnes, an 8% decrease since 2004 but an increase of almost 10% overall since 2001. The majority of this waste is managed properly and in accordance with the law. In 2006, some 31% of hazardous waste was treated *on-site of generation* at IPPC-licensed facilities (see Figure 1). In descending order, this waste was subject to incineration, solvent recycling, landfill and use as fuel. A further 21% was treated *off-site in Ireland* by a network of 14 authorised hazardous waste treatment facilities in Ireland, of which just over half was subjected to disposal operations. The remaining 48% of Irish hazardous waste was *exported* for treatment and disposal abroad, mostly for thermal treatment (incineration and use as fuel), but also for metal recovery, solvent recovery and landfill.

Figure 2 illustrates the long-term trend in the location of treatment of hazardous waste. It shows that the *on-site* treatment of hazardous waste increased in 2006 after a long decline since 1996. The *off-site* treatment of hazardous waste in Ireland has steadily increased over 10 years. The *export* of hazardous waste has become the dominant outlet for Irish hazardous waste, though a decline is noted since exports peaked in 2003/4.

The generation of contaminated soil continues to increase and in 2006, 406,904 tonnes of contaminated soil were removed from brownfield and docklands redevelopment sites for treatment. In 2006, 91% of contaminated soil was exported for treatment, with the remainder treated at a single facility in Ireland.

An estimated 29,888 tonnes of hazardous waste was 'unreported' in 2006. That is, it is not recorded as having entered the formal waste management industry. The source of this waste is small business, households and farms primarily. The estimated generation of 'unreported' hazardous waste decreased by 36% since 2004, and this reduction is principally attributed to a reported reduction in the use of sheep dip (and its subsequent disposal on land).

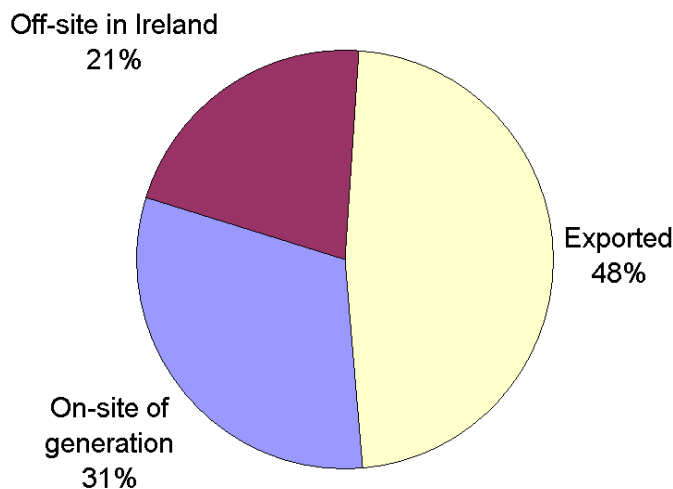


Figure 1 The location of treatment for reported hazardous waste, 2006

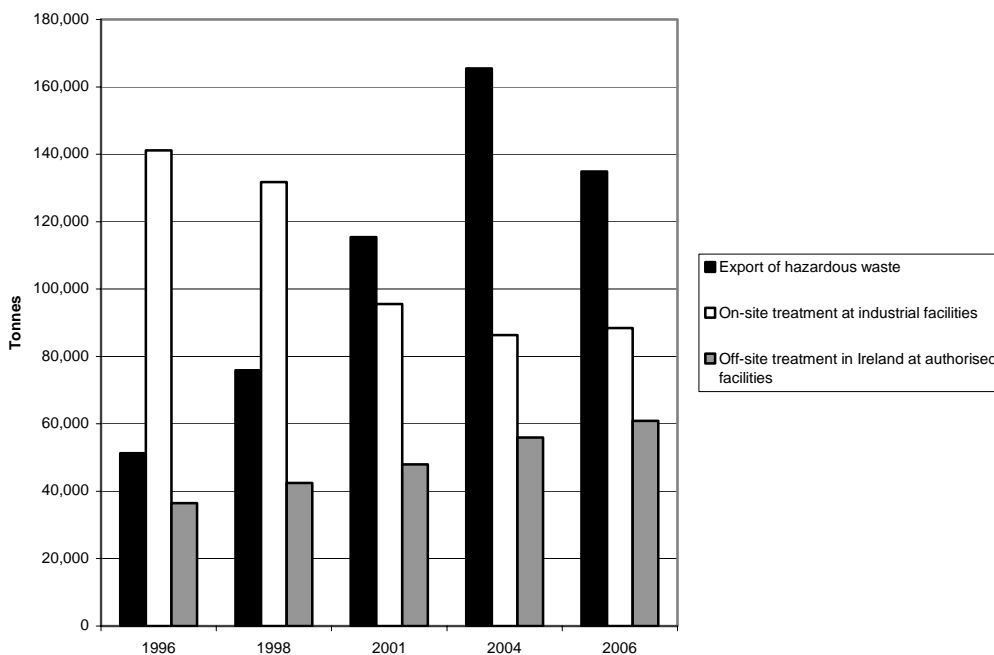


Figure 2 The location of hazardous waste treatment, 1996-2006

The Proposed Plan makes 30 recommendations dealing with:

- prevention of hazardous waste;
- collection of hazardous waste and the enforcement of hazardous waste regulations;
- infrastructure and moving towards self-sufficiency in hazardous waste management;
- legacy issues such as contaminated soil and old landfill site management;
- north-south potential for all-island solutions; and
- implementation.

Prevention

A prevention programme to reduce the gross generation of hazardous waste in certain priority industrial sectors and in households is proposed to be undertaken by the EPA under its National Waste Prevention Programme.

Collection

A comprehensive and accessible network of local drop-off facilities for householders and small businesses is recommended to tackle the problem of 'unreported' hazardous waste. Certain commercial sectors are also highlighted for priority attention in this regard, principally garages and farms, the source of relatively large amounts of 'unreported' hazardous waste. The EPA will take concrete steps to develop solutions with these sectors, in consultation with stakeholders, and to focus enforcement efforts.

Self-sufficiency

A policy of moving towards self-sufficiency is recommended. Of the 48% of hazardous waste exported in 2006, a significant proportion could be dealt with in Ireland at existing authorised facilities and in cement kilns. If Ireland were to become fully self-sufficient, hazardous waste landfill and incineration would be required. It is noted that while a hazardous waste incinerator is licensed to operate in Ringaskiddy, Co. Cork, there are no equivalent proposals on hand for hazardous waste landfill.

Legacy issues

Over 90% of contaminated soil removed from contaminated sites in 2006 was exported for treatment, representing a loss of a valuable resource. More treatment of contaminated soil in Ireland is recommended to ensure that treated soil is available here for engineering purposes.

The management of old waste disposal sites, including those that to a significant extent involved the disposal of hazardous waste, are to be managed according to an existing code of practice drawn up by the EPA's Office of Environmental Enforcement.

It is recommended in the Proposed Plan that the scale and extent of contamination of port and harbour residues be identified and subjected to planned decontamination or other management approaches.

North-south potential solutions

With the easing of restrictions in United Kingdom policy for the movement of hazardous waste for disposal between Northern Ireland and the Republic of Ireland, an all-island market for hazardous waste disposal is now possible. An all-island market for hazardous waste recovery has existed for some time. The Proposed Plan recommends that proposals for hazardous waste disposal infrastructure, landfills in particular, should take all-island considerations into account for capacity planning purposes.

Implementation

Each of 30 recommendations in the Proposed Plan has a timeline and responsible body identified. The principal implementing bodies proposed are the Department of the Environment, Heritage and Local Government, the Environmental Protection Agency and local authorities. An annual report on the Plan's implementation will be prepared by the EPA with the input of the National Waste Prevention Committee.

Consultation

The consultation period for the Proposed Plan opened on 7 November 2007 and will close on **31 January 2008**. During that time, interested persons or parties are invited to make written submissions to the Environmental Protection Agency on the Proposed Plan. Submissions should be sent to:

Proposed National Hazardous Waste Management Plan
Environmental Protection Agency
PO Box 3000
Johnstown Castle Estate
Co. Wexford
Ireland

or by email to:

wasteinfo@epa.ie
quoting "*PNHWMP Consultation*" in the subject line.

All submissions will be made publicly available.

Following due consideration of written submissions provided by interested parties, the Plan will be finalised and published by the Environmental Protection Agency in 2008.