



# The Chartered Institution of Wastes Management

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Office of Climate Change, Licensing & Resource Use  
Environmental Protection Agency  
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Wexford

Monday 13<sup>th</sup> October 2008

Dear Dr Derham,

I am pleased to submit this response to the above consultation on behalf of the Republic of Ireland Centre of The Chartered Institution of Wastes Management (Institution). The Institution welcomes the opportunity to respond to this consultation.

The Chartered Institution of Wastes Management is the professional body representing over 7,000 waste management professionals, within Ireland and the UK but also overseas. The Institution sets the professional standards for individuals working in the waste management industry and has members across a broad range of waste sectors including both private and public sectors.

The Republic of Ireland Centre of the Institution has reviewed the consultation document and wishes to make the following comments:

## **Technical Competence Provisions**

As one of the core premises of BAT is that the principles and technologies applied are those considered best practice, the Institution believes that this principle should be upheld throughout the operational life of a facility.

As such this may require periodic review of the most appropriate available technologies. In order to equip a facility operator or his technical staff with the ability to undertake this process the Institution requests the Agency to give consideration to requiring facility operators to participate in relevant Continuous Professional Development (CPD) on an ongoing basis. We believe that this can be best achieved through membership of a relevant professional body, such as the Chartered Institution of Wastes Management, which allows its members, upon the attainment of certain competence criteria to achieve the grade of Chartered Waste Manager.

The principles of the Institutions CPD requirements ensure that Chartered Waste Managers maintain their knowledge and competence thus adding significant value to their own organisation and ensuring the application of best practice and maintenance of modern best practices in line with BAT.

## **Definitions**

Clear definitions are essential in order to provide clarity. The paper refers to biodegradable municipal waste, biowaste and biological waste. Whilst the first two are defined in the paper, biological waste is not. Another term used is the Organic Fraction of Biodegradable Municipal Waste which, while easily understandable, could usefully be defined in the document. In addition, the use of terms which are



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already defined in legislation, such as Irish waste legislation or European directives is always an advantage.

The definition of pre-treatment is going to become increasingly important. It may be useful to include in the definition a list of processes, such as compaction in a collection vehicle, which do not constitute pre-treatment.

The definition of Stabilized Biowaste is also crucial to the development of the pre-treatment of wastes and to achieving the diversion targets established in the landfill directive. One would assume that if the treated waste achieves the target for Stabilized Biowaste then it will not constitute biowaste at all. However, once a testing regime is introduced, there will always be some failures. The document needs to specify whether such waste would be banned from landfill until it is treated again and passes the tests or whether it may be landfilled even though it fails the test. Furthermore, if it fails the test where does it fall as regards the definition of biowaste?

## Diagrams

The 3<sup>rd</sup> bin mixed organics is shown in Figure 5 to only go for biological pre-treatment and then thermal treatment or as stabilised waste. It is the expectation of the industry that such wastes should be capable of producing quality compost which, similar to green waste compost, will be capable of entering the high grade compost market.

## Validation of Treatment Effort

Further advice would be useful on the validation of the waste treatment. For example, it would be useful to specify a minimum testing frequency, i.e. so many tests per 100 tonnes. There will also be issues for the waste industry as to who should carry out the testing and where the waste should be stored pending the results of the tests.

## Technology Choice

The CIWM believes that it is important that the technologies used to achieve these targets and objectives should not be specified but left open so that future developments in technology will not be compromised. Recent years have seen considerable advances in waste processing and treatment technologies and it is expected that these advances will continue to evolve to meet the ever changing challenges of waste treatment.

Once again I would like to thank you for allowing the Institution to respond to this consultation and would like to respectfully request that we be kept informed of progress in this matter in order that we may continue to contribute further to this process.

The Institution would, of course, be pleased to participate in any future consultations relating to the waste sector.

Yours sincerely

Ted Nealon

Dr Ted Nealon  
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Chartered Institution of Wastes Management (Republic of Ireland Centre)