



Limerick/Clare/Kerry

Regional Waste Management Office

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

Attention of: Dr Jonathan Derham/ Ms Ann Kehoe

RE: Municipal Solid Waste-Pre-treatment & Residuals Management Consultation
Draft

Dear Sir/Madam,

The Limerick/Clare/Kerry Region have agreed to make a joint submission in relation to the above name document on behalf of the four local authorities in the region, Limerick City Council, Limerick County Council, Clare County Council and Kerry County Council.

Background.

There are currently three licensed landfills operating in the region as follows:-

- ✚ North Kerry Landfill is licensed since 1998 licence number W001-03: operated by Kerry County Council
- ✚ Gortadroma Landfill is licensed since 1999 licence number W0017-03: operated by Limerick County Council
- ✚ Central Waste Management Facility licensed since 2001 licence number W0109-01: operated by Clare County Council.

The above landfills will fall into the category of facilities that were operational in July 2001 (Article 14 of the Landfill Directive).

In the Limerick/Clare/Kerry Region there is only one Mechanical Treatment Plant operating in the Region which is sorting residual waste and this is owned by the private sector. There are other Mechanical sorting units in the region that are dedicated to mechanically sort dry recyclables wastes only and also owned by the private sector. As of yet there are no MBT plants in the region nor are there any plants proposed with appropriate planning and waste regulation authorisation.

This region introduced segregated collections in 2005 and now all operators in the region are providing dry recyclable collection to all households signed up to a service and to all commercial premises with a collection service.



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A brown bin for organic waste will be introduced in the region in 2009 for both commercial and household waste. The waste collection permits in the region have been reviewed to condition the introduction of the brown bin including the schedules as per tables below

TABLE 1: Schedule for Segregated Organic Waste Collection for Households

Date	Target
1 st September 2009	20% of Households must have segregated organic collection in each local authority area and shall be primarily located in the areas listed in Table 3 below
31 st Dec 2010	40% of Households must have a segregated organic collection in each local authority area and shall be primarily located in the areas listed in Table 3 below as well as the remaining medium to large towns*

*medium to large towns (medium to large towns are described as those with a population over 800 persons see Table 5 CSO 2006)

TABLE 2 :Schedule for Segregated Organic Waste Collection for Commercial Collections.

Date	Target
1 st January 2009	50% Diversion of Commercial Organic Waste from Landfill
1 st January 2010	100% Diversion of Commercial Organic Waste from Landfill

TABLE 3: Organic Waste Collection areas

Local Authority	Organic Waste Collection Areas
Limerick City	All of Limerick City excluding areas involved in the North and South side regeneration schemes.
Limerick County	Areas covered by the Castletroy & Southern Environs Local Area Plans as well as Newcastle West, Abbeyfeale & Kilmallock
Clare County	Ennis & Suburban Area adjoining Limerick City
Kerry County	Tralee, Killarney, Listowel, Castleisland & Dingle

These tables are agreed schedules following a waste collection permit appeal to the district court by a major collector in the region. These schedules are interim targets to help to achieve the targets contained in the National Strategy on Biodegradable Waste.

The targets in the Replacement Plan for the Limerick/Clare/Kerry region are to decrease landfill in the region to 14% by 2013, with an energy recovery target at 41%



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and the recycling target at 45%. In the region currently there is over-capacity in terms of void space as well as the rest of the country and creates cheap landfills which compete for the residual waste available for landfill. A considerable amount of waste is therefore land-filled outside the region.

Issues and concerns with draft consultation document.

Principal Residuals Management

In this region we would argue that the two principal residuals management options will not be landfill and incineration in the long term but will more likely be landfill with one of the conversion technologies and there has already been announcement regarding the introduction of an autoclave steam gasification plant in the region. We also have private sector groups in the region interested in developing an advanced pyrolysis plant. The EPA should take this into consideration when reviewing this guidance.

Urban Area- Treatment of Black bin Waste

In this region with the continued provision of two bin system and with the introduction of the three bin system commencing in 2009, it will not be necessary for the black bin waste from urban areas with segregated collection to pass through an MBT system. Figure 6 in its current form could be misrepresented as supporting MBT systems over 3 Bin Systems. Item 1 of the table should identify both 2 & 3 bin systems as providing landfill diversion. Item 3a should clearly identify that the diversion of biowaste from the disposal stream will be primarily achieved by a 3-bin system. This is the primary objective of the National Strategy on Biodegradable Waste and as such must be given clear and unambiguous priority at all times. This was further emphasised in the recent circular from the DEHLG "Implementation of Segregated Brown Bin Collection for Bio-waste and Home Composting" which urges local authorities to accelerate the implementation of the National Strategy on Biodegradable Waste. The date for introduction of segregated commercial organic waste collection in this region is Jan 2009. The commencement of segregated domestic organic waste collection is Sept 2009, six weeks after the 16th July 2009 which is the introductory date for pre-treatment acceptance at landfill sites

In the UK guidance and regulations introduced last year these documents clearly state that segregation at source for both household and commercial waste is an acceptable form of pre-treatment prior to landfill. In our opinion it is considered that this pre-treatment would be acceptable as both countries are complying with the same EU Landfill Directive.

The document places too much emphasis on mechanical treatment of residual waste prior to landfill. With well managed separation at source and commitment from the collectors there should be little additional waste recovery from mechanical separation of residual waste. It has taken an enormous effort to achieve the current high rates of



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segregation of dry recyclables. There are more gains to be achieved here yet. There is a very real danger that the promotion of mechanical treatment of residual waste will undermine existing achievements, militate against further improvements in this area and lead to backsliding generally in source separation. The latter is very likely to happen with collectors who are not seriously committed to source separation principles. Furthermore it will most likely add additional costs to operators using clean MRF's at present, at a time when additional costs are also arising from the roll-out of the third bin. This is a very important matter of holding onto existing achievements and concentrating on our principle new objective. Mandatory imposition of mechanical treatment of residual in the short to medium term will detract from both the further development of source separation of dry recyclables and the development of cost effective separate organic waste collections. Most likely all collectors will construct new facilities to process residual waste and the costs of these will inevitably be passed on to the customers.

It should also be noted that most collectors outside Dublin City operate in both rural and urban areas continuously. Collection routes move between urban and rural areas a number of times in one collection route in many cases. It is the nature of the business in Ireland that it would not be practical for many of the operators to separate their urban and rural customers. It is accepted that this may not be the case in Dublin and that there may be scope for the introduction of mechanical separation there at some stage in the future in the absence of thermal treatment as a disposal route.

Mechanical Separation of Residual Waste

There are a number of additional concerns about the proliferation of mechanical separation plants. The value of such facilities, also known as 'dirty' MRF's has been largely discredited in Europe in the recent past. It is understood that they did not significantly advance the cause of recycling, produced little in the way of high value recyclables and their running costs did not justify the returns. In our view it would be a retrograde step to promote the development of such facilities in Ireland in any significant way.

There is some evidence already in this country that the mechanical separation of the organic fraction from residual waste has led to cynical exploitation by waste contractors and private landfill operators. Mechanically separated organic waste has been dumped in large quantities in landfills, making the process of separation futile in the first place and making a mockery of good waste management practice. This situation has come about by miscoding of this waste stream to avoid landfill levy payments and to a lesser extent by price concessions by local authorities under financial pressures to get as much waste in to their landfills as possible. It has also been assisted by a lack of rigorous enforcement of private sector waste activities, transfer stations and landfills in particular.



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Stabilised bio-waste is the organic segregated fraction from Mechanical Treatment. There are no useful outlets for stabilised bio-waste produced from residual waste. Thermal treatment would appear to be the best alternative form of disposal to landfill, in which case there is no point in separating and stabilising the waste in the first instance.

Waste Shipped Directly to landfill/transfer station from households.

Waste segregation facilities are provided at transfer stations and landfills and therefore it is assumed that this will be equivalent to source segregation for householders dropping waste directly to transfer stations/landfill. An awareness campaign will be carried out to advise householders self-hauling waste to transfer stations/landfills of the requirement to segregate the waste in advance of the 16th July 2009 deadline.

There is an argument to be made for discouraging the current widespread practice of opting out of kerbside collection systems in favour of taking waste directly to landfills. Currently there are only 63% of householders in the region signed up to a collection service. This low collection rate has a negative effect on the economics of waste collection services, particularly in the context of developing segregated collection systems. The banning of direct deposition of waste in landfills in particular will guarantee better pre-treatment of waste and will support and improve the economic viability of two and three bin collection systems. While such a measure might be perceived to be imposing additional costs on some households initially it will bring greater benefits in the long term. This situation undoubtedly contributes to the proliferation of illegal dumping throughout the country. The interpretation of the pre-treatment requirements provides a great opportunity to rectify the position now and improve waste management practices generally.

Waste Diversion

The roll-out of third bin for organic waste in the region for both commercial and household waste should mean that we meet the 2010 targets of the National Strategy on Biodegradable waste and we are predicting that with the development of conversion technologies we would also reach the 2016 diversion target. We have based our calculations on the average organic waste arisings per household from EPA National Waste Report for 2006 and the current Galway city statistics brown bins. The commercial calculation is based on the breakdown of commercial waste in the EPA National Waste Report 2006. The region has been preparing for the last number of years to meet these diversion targets.

We will also be promoting home composting in the region. The household waste collection survey completed in 2008 revealed that 20% of household in the region had home composters and we aim to increase this target to 35% over the next two years with



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further awareness and workshop training being carried out as part of this promotion. This will also assist in achieving the 2010 diversion targets.

Waste to Energy Incinerator.

This section of the guidance document deals only with waste ash from incinerators and as incineration is unlikely to develop in this region the guidance document needs to deal with char waste from pyrolysis and left/over residual waste from autoclave steam gasification process.

Conclusion

At this stage the region is in a position to potentially reach the landfill diversion targets with the three bin system, more home composting and development of conversion technologies. The region will further use Article 20(g) (ii) of Waste Management (Collection Permit) Regulations, 2007 and amendments to ensure that waste is delivered to facilities in the waste hierarchal order. This draft document seems to prioritise treatment of residual waste rather than the introduction of the brown bin and it would be our opinion that would not be in line with the waste hierarchy.

Queries in relation to this submission can be addressed to Philippa King at 061 496842 or email pkings@limerickcoco.ie.

Yours Sincerely

Philippa King
Regional Waste Co-ordinator,
Limerick/Clare/Kerry Region.