



# **National Hazardous Waste Management Plan 2014-2020**

**Compendium of Public Consultation Submissions and Responses**

**June 2014**

**List of Organisations/Individuals from whom submissions were received**

Public consultation on the Proposed Revised National Hazardous Waste Management Plan was carried out between 23<sup>rd</sup> October 2013 and 23<sup>rd</sup> December 2013. A total of 21 submissions were received. Submissions were received from the following:

Angela Hetherton (no affiliation given)  
Animal and Plant Health Association  
Cappagh Farmers Support Group  
Cork Harbour Alliance for a Safe Environment  
Department of the Environment, Community and Local Government  
Dublin City Council/National Transfrontier Shipment Office  
Dun Laoghaire – Rathdown County Council  
Engineers Ireland  
Health Service Executive  
Indaver Ireland Ltd  
Irish Doctors Environmental Association  
Irish Medicines Board  
Irish Waste Management Association  
Monaghan County Council  
Noel Duffy, Cork Institute of Technology  
Patel Tonra Environmental Solutions (on behalf of Murphy Environmental Hollywood Ltd)  
Roscommon County Council  
SRCL Ltd  
Teresa Ryan-Feehan, Site Manager Athlone Recycling Centre  
Veolia Environmental Services Technical Solutions Ltd

The following table provides details of the submissions received and how such submissions were taken into consideration in revising the National Hazardous Waste Management Plan. Submissions are grouped and presented under general headings or themes.

General		
Ref.	Submission	Response
1	Hazardous Waste Contractor indicates that they treat potentially infectious healthcare risk waste. Following the process the treated material is referred to as flock. This year (2013) 100% of the flock will have been diverted from landfill and sent for thermal recovery. Submission suggests that the flock be reclassified as a by-product and not as waste.	Regulation 27 of the European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) sets out the requirements concerning waste being regarded as a by-product.
2	<p>Submission calls on the EPA to remove themselves from this process. Submission states that the EPA has shown no independence, accountability and transparency in dealing with Aughinish Alumina Plant in Askeaton.</p> <p>Press release concerning the Proposed Revised Plan is misleading in stating that good progress has been made in recent years regarding hazardous waste management.</p> <p>Submission outlines concerns with the EPA classification of red mud waste at Aughinish Alumina as non-hazardous waste.</p> <p>Submission outlines concerns with the granting of a licence to Aughinish Alumina in 1998 and an unlined red mud pond in close proximity to the Shannon Estuary which has led to serious seepage of heavy metals. Adds that in 2006 an EPA inspector refused to license the construction of a second proposed mud pond on a number of grounds which are outlined</p>	<p>EPA has responsibility to produce the Hazardous Waste Management Plan under Section 22 of Waste Management Act 1996 as amended. Licensing issues concerning Aughinish Alumina are not considered to be within scope of the National Hazardous Waste Management Plan (NHWMP).</p> <p>Press release states that good progress has been made particularly in the area of waste prevention initiatives established under the National Waste Prevention Programme. This is supported by the findings of the 2011 implementation report concerning NHWMP 2008-2012 and content of the Proposed Revised Plan.</p> <p>Waste is classified as being hazardous when it displays one or more of the hazardous properties listed in the Second Schedule of the Waste Management Act as amended (e.g. explosive, oxidizing, flammable, irritant, harmful, toxic, carcinogenic). The relevant property or properties are determined by property testing or, where applicable, concentration based criteria. Individual waste classifications are not considered to be within the scope of the NHWMP.</p> <p>Licensing issues concerning Aughinish Alumina are considered via the EPA licensing application assessment process and licensing enforcement.</p>

<p>and commented on in detail. The licence was then granted for the construction of a second pond of 200 acres with 20-50 million tonne capacity with the initial demands dropped as the company would not consider them as an option.</p> <p>Submission indicates that an ex management employee of above company has stated that the quantity of hazardous waste stored in the ponds is closer to 50 million tonnes than the 20 million tonnes stated by the company and the EPA. Article in the publication Hot Press on 9<sup>th</sup> October 2013 includes a statement from scientist Declan Waugh that the Aughinish waste lagoons are one of the most fluoride contaminated sites in the world. Findings by Mr Waugh have raised concerns with the community on the dangers of fluoride to human health and interactions with many unknown chemicals in the waste ponds. EPA has refused to make public the contents of all chemicals in these red mud lagoons.</p> <p>Objections by this group and others to licences granted to Aughinish Alumina have been ignored by the EPA over the years. Submission describes objection made by Foynes Community Council to Limerick County Council to the grant of planning permission for a second mud pond (Bauxite storage area) and includes sections from a consultation questionnaire detailing their concerns.</p> <p>Submission indicates that the public process undertaken by the EPA is another PR exercise and a joke at the highest level that is to be seen by Europe to involve the public with their input totally ignored.</p> <p>Cappagh Farmers Support Group has made complaints to the European Commission in relation to breaches that the EPA is allowing to happen. The Commission found that two waste directives were breached even though the EPA went ahead and granted a licence to Aughinish Alumina. EPA ignored their own licence regulations to facilitate this company.</p>	<p>Licensing issues and environmental and health concerns concerning Aughinish Alumina operations are dealt with via the licensing application assessment process and licensing enforcement. The Freedom of Information Acts, 1997 and 2003, gives the public a right to access records held by the EPA. The Access to information on the Environment Regulations give the public right to access Environmental Information held by, or for, the EPA.</p> <p>Licensing issues concerning Aughinish Alumina are considered via the licensing application assessment process and licensing enforcement.</p> <p>Section 23 of the Waste Management Act 1996 as amended requires that written representations in relation to the Proposed Plan to be taken into consideration before making the revision of the Plan.</p> <p>Licensing issues concerning Aughinish Alumina operations are considered via the EPA licensing application assessment process and licensing enforcement.</p>
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	<p>EPA ignores all public concerns and their own guidelines and will protect big business. EPA is abusing their power under Section 15 of the EPA Act 1992 that allows them immunity from prosecution. Group would go far to say that the waste facility and the EPA are out of control. Public should object that the EPA is playing any part in this process. Submission encloses articles from Irish Daily Mail, Irish Independent, Limerick Leader and the Foynes Community Council objection.</p>	<p>Observation considered not relevant to the scope of the NHWMP.</p>
<p><b>3</b></p>	<p>In early 2013, Engineers Ireland outlined the need for the new waste management plans to be put in place within the next 12 months in order to facilitate the proper planning of waste management. These are important in developing a planning framework which encourages appropriate treatment capacities to be developed and the submission welcomes the proposed revision.</p> <p>There has been a noticeable and dramatic change of lifestyle in Ireland over the last decade in terms of waste management and this momentum should be built on. Important to continue improving the network of civic amenity sites/drop off sites to ensure householders and small businesses can continue to dispose of a full range of hazardous wastes in an appropriate manner.</p> <p>The involvement of all public and industry stakeholders is vital to ensure the effective and sustainable management of Ireland's hazardous wastes. Fully committed to supporting EPA's brief and will continue to promote importance of minimising hazardous wastes as well as having them collected and treated correctly in accordance with the waste hierarchy.</p>	<p>Revised National Hazardous Waste Management Plan and new Regional Waste Management Plans are currently under development.</p> <p>Sections 5.1.2 and 5.2.2 of the Plan addresses civic amenity sites and recycling centres including suggestions and recommendations for improvement.</p> <p>The Proposed Revised Plan has been made available for public consultation. The National Waste Prevention Committee which includes representation from a number of stakeholders has oversight for the Plan's implementation.</p>
<p><b>4</b></p>	<p>Submission notes the Proposed Revised Plan's objective "<i>to minimise the environmental, health, social and economic impacts of hazardous waste generation and management</i>". From a public health point of view one of the most hazardous waste products is faecal matter that is contaminated with pathogenic organisms from infected humans or animals which is</p>	<p>Faecal matter is included under Article 2 (Exclusions from the scope) of Waste Framework Directive (2008/98/EC) and therefore not considered to be within the scope of the NHWMP.</p>

	<p>planned to increase substantially in line with the proposals of Food Harvest 2020. However the European Communities (Waste Directive) Regulations 2011 appear to exclude faecal matter as a form of waste. Presumably this is because this type of hazardous material is covered by other legislative requirements. Despite legislative and other efforts, every year microbiological contamination incidents occur in the environment, which affect human health. This group is aware of outbreaks of serious infections associated with contaminated drinking water or direct contact with hazardous faecal matter with transfer of infection to vulnerable settings such as pre-school crèches. The sources of such contamination are either human or animal waste. Submission suggests that the revised National Hazardous Waste Management Plan might consider how effectively legislative and other requirements in relation to such waste are enforced or implemented.</p>	
5	<p>Household hazardous waste is being accepted at Athlone Recycling Centre. Submission indicates that no risk assessment was done and no training, guidelines, protective clothing given to staff handling the waste. Submission states that staff have complained about lack of training, unacceptable storage facility, lack of supplies to handle this waste on site. Waste is stored in an unventilated shed and according to the submission makes workers sick. Staff have been exposed to toxic, poisonous gas which is unregulated. Matter has been reported to EPA, HSA, Westmeath County Council but 'no one gives a damn'. Unacceptable for public bodies to sit back and do nothing. Submission wants action now and not after weeks of consultation.</p>	<p>Responsibility for health and safety on the site rests with the operator. A draft code of practice/guidance document on the minimum operational and environmental standards for accepting hazardous waste at civic amenity sites is at an advanced stage and the Plan includes recommendation for a code of practice/guidance document to be disseminated to local authorities and civic amenity site operators.</p>
6	<p>Submission seeks to represent the combined and agreed views of all Irish Waste Management Association (IWMA) members that are active in this market sector. Submission would welcome further discussion with EPA on the Proposed Plan and are available to clarify any of the submission. Looks forward to further engagement during the Plan's preparation.</p>	<p>Public consultation on the Proposed Revised Plan was carried out between 23<sup>rd</sup> October and 23<sup>rd</sup> December 2013. Section 23 of the Waste Management Act 1996 as amended requires that written representations in relation to the Proposed Plan to be taken into consideration before making the revision of the Plan.</p>

<p>Submission views the draft Plan as sensible and next step in terms of future developments of this market. 2012 Government policy (pg IV of draft Plan) is fully supported. Clear, well defined policy objectives will support sound economic developments that can be implemented by members.</p> <p>The introduction text may require review as broad-based terms such as 'can seek', 'encourage', 'generally' are used instead of more specific terminology. For industry to significantly invest in a market they must believe there is strong government support which is not obvious in the language.</p> <p>Regarding reference to the often prohibitive costs to small industry of commercial hazardous waste collection, submission proposes setting up of a representative group and developing a workable solution (including guidance notes and ensuring lower cost solution adheres to necessary standards to protect environment in line with risk). Group to include hazardous waste industry, EPA, Local Authorities, Small to Medium Enterprises and possibly consumer groups. Expanded use of civic amenity sites has merit but should be discussed under this group.</p> <p>Summary should make reference that the last few years has seen the treatment of hazardous waste in Ireland move from disposal based to a much higher percentage of recovery with emphasis on energy recovery and recycling.</p>	<p>Noted.</p> <p>Government policy states that the NHWMP is a strategic level document designed to provide overall direction to policy and decision makers involved in the prevention and management of hazardous waste. All of the Plan's recommendations are designed to reduce the environmental impact of hazardous waste. Local authorities are obliged to take these recommendations into account when they review their own waste management plans. The Plan outlines that the EPA and public sector can only seek to influence, but cannot control private sector investment decisions.</p> <p>The National Waste Prevention Committee (NWPC) has oversight of the implementation of the NHWMP. The Plan also outlines that the NWPC has responsibility for participating on sub-groups that may be established for specific purposes, as may be decided by the Committee.</p> <p>The Executive Summary presents the trend in hazardous waste treatment in Ireland from 2006-2011. A graph has been added to the Plan to illustrate the trend between 2006 and 2011 in the recovery and disposal of hazardous waste generated in Ireland. It indicates that whilst there has been a reduction in both recovery and disposal of hazardous waste on-site by industry, the overall trend shows a move towards waste recovery with significant increases in the quantity of hazardous waste sent both for recovery off-site in Ireland and abroad.</p>
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7	Regarding Plan implementation, the suggestion of “new” resources possibly raises unrealistic expectations among stakeholders? Perhaps the use of the word “appropriate” instead of “new” better reflects the realities of the competing demands for scarce resources and the need to prioritise their allocation in the light of all the circumstances?	Observation considered valid on the basis that Section 8.2 of the Plan (Resource Requirements) outlines that Ireland is currently experiencing significant cutbacks in public sector resources. The text is amended as per suggestion.
<b>Prevention</b>		
	<b>Submission</b>	<b>Response</b>
8	Medicines are implicated in the priority sectors for hazardous waste prevention. Proposals are supported.	Noted.
9	More investment and effort needed in hazardous waste reduction and prevention including government financial support. More effort on waste avoidance and modifying of waste streams to eliminate hazardous waste.  More emphasis needed on the Green Public Procurement Action Plan.	Prevention and reduction of hazardous waste is one of the key objectives of the NHWMP and a number of prevention recommendations are made. The Plan also includes a focus on product based prevention, detailed under Section 4.4.1 (Qualitative or product-based prevention).  Green Public Procurement is detailed under Section 2.5.6 of the Plan.
10	Submission expresses support for the very positive aspects regarding solvent waste prevention that are included within the Proposed Plan. Suggest that consideration be given to a clear expression of policy favouring the recovery and reuse of solvent on the island, lest there be any perception of regulatory inhibition. The primary source of solvent waste is the pharmachem sector and there is little market for recovered solvent in non-pharmachem applications in Ireland. Many pharmachem companies undertake extensive recovery for internal reuse. The technical capability and volumetric capacity for solvent recovery varies across the sector, with the intermittent nature of solvent use further complicating the situation. It has been shown that where companies can “pool” solvent from sites	The Plan includes a specific sectoral prevention plan for the pharmaceutical and chemical industry. Section 6.4 of the Plan concentrates on the management of solvents including an indication that capacity is required for solvent treatment – either solvent recycling (R2), use instead of fossil fuel at existing appropriate sites (e.g. at existing pharmachem facilities, in existing cement kilns) (R1), in purpose built incinerators (D10), and/or alternatives (as outlined in section 6.3) as appropriate. Domestic capacity could be provided in either of two locations: on-site of generation, or off-site at commercial facilities in Ireland. The Plan also indicates that there is the apparent limited market for recycled solvent in Ireland.

	<p>within the corporation that higher recovery will be achieved. Consideration should be given to facilitating recovery of one company's solvent by a second company's recovery process, for reuse back in the originator's process. This approach would maximise the efficiency of available recovery facilities. Such an approach is inhibited by product quality concerns, which might resist the use of recovered solvent. There may be perceptions of IPPC regulatory concerns.</p> <p>Companies operating recovery facilities are primarily manufacturing sites and might be concerned about being considered as waste processors and that seeking approval from EPA to undertake such activity, outside of the normal licence review schedule, might prompt an unanticipated and unplanned general licence review.</p> <p>The Proposed Plan expresses a desire to achieve beneficial use of any solvent classified as waste. It is arguable that the revised classification of waste would facilitate activities that are oriented to the sustainability pillars (economic and social as well as environmental) without any further discussion. Suggest examination of the text in the Proposed Plan to ensure policy clearly favours recovery processes and will address any licensing concerns.</p>	<p>Any specific changes to waste activities of licensees are subject to the EPA licensing processes.</p> <p>Regulation 27 of the European Communities (Waste Directive) Regulations 2011 (S.I. No. 126 of 2011) sets out the requirements concerning waste being regarded as a by-product. Text has been added to the Plan indicating that the EPA should maintain engagement with the sector to examine issues concerning the treatment of solvent in Ireland and explore acceptable solutions to promote solvent recycling and recovery.</p>
<b>11</b>	<p>The continuation of the general toolbox on prevention and resource use minimisation (table 18), especially 'research dissemination and studies' and financial support tools is welcome.</p>	<p>Noted.</p>
<b>12</b>	<p>Healthcare provision is a source of healthcare risk waste such as waste contaminated with blood-borne, wound and other infectious material and radioactive waste from various radiological services. Notes that the healthcare sector is identified as a prioritised sector for hazardous waste prevention improvements and submission supports efforts for minimisation that is compatible with quality healthcare.</p>	<p>Noted. Radioactive waste is included under Article 2 (Exclusions from the scope) of Waste Framework Directive (2008/98/EC) and is outside the scope of the NHWMP.</p>

<p><b>13</b></p>	<p>Application of more resources should help producers clearly identify costs and develop methodologies to reduce waste arisings. IWMA very supportive of this area which must be the Plan's priority and must encourage industry to adopt beneficial changes. National Waste Prevention Programme has seen positive results but greater effort needed to make this a standard part of on-going process development. Education and dissemination of case histories will assist.</p> <p>Include a new point to engage with Gardaí and Revenue to seek to reduce the market for illegally laundered diesel (reduce hazardous residues arising).</p>	<p>Prevention is a priority focus in the NHWMP and the role of the NWPP is outlined. Specific recommendations on guidance and awareness are included in the Plan.</p> <p>A recommendation has been added to the Plan for DECLG to assist relevant Departments and Agencies to examine the feasibility of alternatives to the diesel fuel marking system that can help eliminate illegal diesel laundering operations and prevent the generation of hazardous waste and associated environmental clean-up costs arising from such activities.</p>
<p><b>14</b></p>	<p>Perhaps worth mentioning study currently being undertaken by the EPA on the development of Green Procurement Guidance for the Public Sector?</p> <p>Appropriate to include sectoral plans for <i>“transport”</i> and <i>“publishing and printing”</i> as in NHWMP: 2008 to 2012?</p> <p>Under the Pharma Sector Prevention Plan (last point on financial support) – <i>“A research and innovation fund should be made available to assist technological innovations”</i> – it is important that the nature of the research and innovation fund is clarified. Perhaps this funding should be provided by the industry or at least matching funds?</p> <p>Agricultural Sector Prevention Plan – text should be aligned with the NWPP to fully reflect the strong synergies that exist with the NHWMP. The potential role of DAFM with regard to <i>“financial supports to farm and farm advisory bodies”</i> should perhaps be clarified?</p>	<p>Green Public Procurement is detailed under Section 2.5.6 of the Plan including further reference to EPA's role.</p> <p>Sectoral prevention plans for transport, and publishing and printing are now included under Section 4.3 of the Plan.</p> <p>Text has been amended to indicate that a research and innovation fund should be made available, with support from the sector, to assist technological innovations.</p> <p>The role of the NWPP is detailed under Section 4.4.2 and indicates that the NWPP should coordinate the principal prevention initiatives outlined in the Proposed Revised Plan. The source of financial supports is not specified however initiatives such as the Smart Farming programme are funded by the EPA (via the Environment Fund) and the IFA.</p>

	Healthcare Sector Prevention Plan – text should be aligned with the NWPP to fully reflect the strong synergies that exist with the NHWMP.	The role of the NWPP is detailed under Section 4.4.2 and indicates that the NWPP should coordinate the principal prevention initiatives outlined in the Proposed Revised Plan.
	Household Sector Prevention Plan – text should be aligned with the NWPP to fully reflect the strong synergies that exist with the NHWMP.	See above.
<b>Producer Responsibility</b>		
	<b>Submission</b>	<b>Response</b>
<b>15</b>	<p>Take-back schemes for human medicines work well in some areas. A National Policy here would be beneficial in underpinning responsibility and ensuring compliance.</p> <p>For wholesalers, EU guidelines require disposal/destruction of human medicines in accordance with national legislation (Irish Medicines Board inspectors look to wholesalers to have agreements with service providers).</p> <p>Animal remedies take back poses problems (leaky stock) and not widely known.</p>	<p>In 2012 the DECLG commenced a wide ranging review of existing producer responsibility agreements currently in operation in Ireland which is also examining the feasibility of the introduction of additional producer responsibility initiatives (PRI) for waste streams, including hazardous wastes such as human medicines. The DECLG PRI review is referred to in the Plan and the Plan recommends the assessment and development of potential new producer responsibility obligations for certain hazardous waste streams (e.g., a take-back scheme for unused or expired human medicines), on foot of the recently established review of producer responsibility initiatives and detailed studies into priority hazardous waste streams.</p> <p>Reference has been added under Section 5.1.3 of the Plan to the Pharmaceutical Society of Ireland guidelines on the sourcing, storage and disposal of medicinal products within a retail pharmacy business.</p> <p>See above regarding DECLG PRI Review.</p>
<b>16</b>	Fully used animal remedies are not discussed within the animal remedies regulation but still need to be disposed of. Concern that fully used animal remedies containers are being returned with partially used and expired remedies. The cost for the disposal of returns is an issue. The user of animal remedies has multiple purchase options available to them and	This is considered relevant to the DECLG producer responsibility review which includes the examination of potential initiatives for hazardous waste streams including animal remedies.

	veterinary practices would have a concern that they would incur the cost for the disposal of animal remedies which were not sold by them in the first place.	
<b>17</b>	With the establishment of Irish Water, there may be potential for national retail take-back scheme for used medicines (as likely to end up in the wastewater treatment network putting excessive load on treatment capabilities). Suggestion that a national education and awareness programme lead by Irish Water, in consultation with HSE and Irish Pharmacy Union, would reduce the amount of hazardous waste disposed without appropriate treatment.	This is considered relevant to the DECLG producer responsibility review which includes the examination of potential initiatives for hazardous waste streams including human medicines.
<b>18</b>	Some background to the PRI review that was established in 2012 provided. Expected that the review final report will be published in the first half of 2014. The report will include segments on packaging, farm plastics, batteries, information and awareness, enforcement, competition in the compliance schemes, and possible new areas that might be covered by Producer Responsibility agreements. The report will make recommendations in areas such as pharmaceutical products and medicines, unused human medicines, veterinary medicines and waste motor oil. In November 2013, reports dealing with Waste Tyres and End of Life Vehicles (ELV) were published and a period of consultation will take place until the end of January 2014. Report concludes that domestic ELV system is not performing well and is not working for a variety of stakeholders. Report recommendations include the establishment of a compliance scheme with responsibility for achieving the national ELV targets and recommendations include fees charged to the first owner of the vehicle in the event of a funding shortfall. Implementation of the Continuous Vehicle Taxation System will assist in resolving the disparity between the number of ELVs arising and the number of certificates of destruction issued. The Minister has set a deadline of 1 <sup>st</sup> January 2015 for the new system and regulatory structures to be in place. DECLG intends to establish an ELV Working Group to assist in the drafting of new	The Plan highlights that publication of the final report on the PRI Review is expected in 2014. The Plan also indicates that DECLG are currently considering a number of measures aimed to address difficulties concerning ELVs and new regulatory structures are expected to be in place by 2015.

	regulations.	
<b>19</b>	Producer responsibility should be applied where waste should go back to producer for disposal and recovery. This adds pressure on waste producer to modify raw materials and reduce waste stream (e.g.: return paint to manufacturers).	This is considered relevant to the DECLG producer responsibility review which includes the examination of potential initiatives for hazardous waste streams.
<b>20</b>	Take-back schemes for old, unused or expired medicines from the home are organised from time to time by local health authorities. These type of collections are intermittent and the subject of budgetary constraints. Take back schemes are organised through pharmacies under the suicide prevention programme commonly called the DUMP scheme.	See above.
<b>21</b>	Pharmacies should be required to inform you when getting a prescription that they accept out of date medication for disposal.	See above.
<b>22</b>	Submission is particularly concerned about unreported hazardous waste. Submission proposes that when the DECLG examine 'producer responsibility', that consumer responsibility is also examined. Submission fully supports the proposal to add paints, batteries and other hazardous wastes to the proposed nationwide take back schemes for medicines.	See above. Consumer behaviours can be encouraged via guidance and awareness which is included in recommendations in the Proposed Plan. Once PRIs are established, consumers should have further options for hazardous waste management.
<b>23</b>	Use of PRIs has some merit but submission is suspicious that this is used to collect more funding (stealth tax) from consumers without yielding significant benefit. Consumers pay for solutions whilst entities in the chain absorb significant funds.  The imposition of potential PRIs is best dealt with under the current PRI review rather than specifically under the NHWMP.	This is considered relevant to the DECLG producer responsibility review which includes the examination of potential initiatives for hazardous waste streams.  The role of the NHWMP is to make recommendations regarding the management of hazardous waste. The potential role of PRIs for hazardous waste streams is considered in this respect.
<b>24</b>	Submissions made suggested changes to text and recommendations to reflect the content of the Plan and improve consistency, particularly with regard to the role of funding from producer responsibility initiatives. Clearer expression needs to be made to the polluter pays and producer	Amendments to text and recommendations have been made where considered appropriate. The potential role of funding from producer responsibility initiatives is further emphasised.

	responsibility principles.	
	<b>Infrastructure and self-sufficiency</b>	
	<b>Submission</b>	<b>Response</b>
<b>25</b>	<p>Concerning asbestos, the Proposed Revised Plan proposes that additional capacity be provided in specialist cells in a number of existing non-hazardous landfills. As the UK Waste Management Plan prohibits the import of waste for disposal clarification is sought on what policy direction and incentive for a Local Authority or private landfill can be provided and the location(s), capacity of such a landfill(s) and timeline for its availability.</p> <p>Regarding the objective of self-sufficiency and reduced exports, clarity on the regulatory role of the National Transfrontier Shipment Office (NTFSO) may be appropriate in relation to raising objections to shipments for:</p> <ul style="list-style-type: none"> <li>• Disposal, on the grounds of proximity principle or national legislation relating to environmental and health protection, or that the waste is mixed municipal waste collected from private households.</li> <li>• Recovery, on the grounds that the planned shipment would not be in accordance with national legislation.</li> </ul>	<p>The 2012 UK Plan for Shipment of waste allows hazardous waste movement (for certain disposal operations) in either direction between Northern Ireland and Republic of Ireland. NHWMP does not set out to specify locations but expresses the need for infrastructure where strategically advisable, technically and economically feasible. The Plan provides estimated capacity needs based on quantities of hazardous waste exported for disposal. References are also made to potential capacity needs as identified in the National Difficult Waste Facility study.</p> <p>Article 11 of EU TFS Regulation (1013/2006) provides for objections to shipments for disposal. A recommendation has been added to the Plan for the development of national policy or guidance to direct the control of hazardous waste shipments in order to facilitate self-sufficiency in hazardous waste treatment where this is technically, economically, strategically and environmentally advisable.</p>
<b>26</b>	<p>Self-sufficiency may not always be feasible and depends on critical mass of waste being produced (Ireland does not have heavy industry producing difficult or complicated wastes).</p> <p>Building large scale incinerators for hazardous waste disposal should not be considered. More appropriate to build small scale units that are versatile and portable. Better technologies for specific waste treatment.</p>	<p>Self-sufficiency is an aim in the Plan where strategically advisable, technically and economically feasible.</p> <p>Incineration and co-incineration are included as strategic needs to reduce export of hazardous waste for incineration. Options for alternative hazardous waste treatment techniques are detailed in Section 6.3 including an indication to provide supports for hazardous waste treatment technologies.</p>

	<p>New uses are being found for waste streams which are more environmentally beneficial, reduce fossil fuel and reduce waste available for large scale units.</p>	<p>No examples provided in submission. The Plan does include co-incineration and fuel use as options for waste treatment.</p>
<p><b>27</b></p>	<p>Self-sufficiency should be appropriate, justified and must not be done at the expense of Best Available Techniques (BAT). For example the incineration of hazardous waste at a municipal incinerator could not be considered BAT (it is noted that the EPA has referenced an application made by a merchant MSW incinerator to accept hazardous waste). Proper waste management encourages the segregation of hazardous and non-hazardous waste early in the waste management system, before collection. A merchant non-hazardous waste incinerator with permission to accept hazardous waste has the potential to encourage the mixing of hazardous waste with non-hazardous waste amongst waste producers which is contrary to regulations, guidelines and good management practices. For waste management to move forward it is not appropriate to copy the older MSW incineration facilities in operation in other EU countries. It is more appropriate to set the standards to the highest levels and meet them. Submission includes text from a 2009 Okopol report which indicates from its analysis that BAT required for the incineration of hazardous wastes are not realised in many municipal waste incinerators.</p> <p>With regard to the calculated quantity of waste that could be potentially available for incineration (approx. 22,000 tonnes), such a volume would comprise significantly different waste types (different hazardous properties) and it would be unlikely that an incinerator would be able to deal with this variety. With the requirement to deal with the resulting residual fly ash, the submission questions the justification of an incinerator (with all ancillary and associated infrastructure requirements). Submission also has concerns about the calorific value of such wastes and difficulties with sustaining the high temperature requirements (need for fossil fuels and recoverable wastes to facilitate the operation).</p>	<p>The Plan states that the EPA continues to encourage the development and introduction of new and innovative technologies and techniques for treating hazardous waste where they meet legislative, regulatory, policy and BAT criteria.</p> <p>Regarding any proposal for hazardous waste treatment, the Plan states any proposal will of course require a waste licence or permit before operations can begin and this will ensure that operational facilities operate in a manner that represents BAT and will not cause environmental pollution.</p> <p>BAT forms the basis of EPA licensing and therefore a licence application for hazardous waste incineration at MSW incinerator will not be granted if not operational in accordance to BAT. Operation of such a facility, if granted a licence, will be subject to licence conditions and associated enforcement by the EPA's Office of Environmental Enforcement. The current application referred to is subject to a full environmental assessment and industrial emissions licence determination process.</p> <p>The Plan recommends that Ireland should strive for greater self-sufficiency in hazardous waste management where it is strategically advisable, and where it is technically and economically feasible. The Plan also states that it is a matter for the private sector to judge whether investment in an Irish hazardous waste incineration facility, or alternative treatment technologies, would make commercial sense in the context of the evolving European market.</p>

	<p>Submission makes a cautious welcome to the use of hazardous waste by the cement industry as a substitute for fuel and stresses the need for such operations to be compliant with relevant legislation. Alternative solutions that are further up the waste hierarchy must be used if in compliance with BAT.</p>	<p>Any cement production facility seeking to use hazardous waste for fuel use would be subject to associated licensing requirements. Seeking to achieve hazardous waste prevention and management in accordance with the waste hierarchy is a common theme throughout the Plan.</p>
<b>28</b>	<p>Organisation supports self-sufficiency ambitions for particular wastes. The current trend of exporting hazardous wastes for treatment to other EU Member States reflects the State's inability to date to manage its own residual wastes. It is unfortunate that current government policy indicates that large-scale public investment in hazardous waste infrastructure will not be made. Export solution is providing short term gain; it is a reactive and market driven approach to a long-term environmental problem and is undermining national waste policy, planning and legislation.</p>	<p>The Plan sets out a clear recommendation for self-sufficiency (where strategically advisable, technically and economically feasible) and includes the recognition that infrastructure is provided by private organisations or through public private partnerships. The Plan makes the recommendation for DECLG to keep under review the provision and facilitation of hazardous waste treatment capacity and make recommendations on the appropriate economic or other instruments necessary for such capacity to be provided, either by the private or public sector.</p>
<b>29</b>	<p>Regulation 1013 of 2006 on the Shipments of Waste allows an EU Member State to place restrictions on transboundary hazardous waste management movements to disposal. The EPA could include a policy in the NHWMP to ensure that hazardous waste shipments to non-Irish disposal facilities are restricted.</p> <p>Submission strongly agrees with the need for Ireland to have its own hazardous waste landfill. Concur that in the absence of a dedicated hazardous landfill site, hazardous waste should be accepted in one or more specialist cells in existing landfills.</p> <p>EPA should consult with relevant stakeholders in the development of a Waste Acceptance Criteria for such a facility. This would remove uncertainty amongst developers regarding the relevant criteria in obtaining an EPA licence for such a facility.</p>	<p>A recommendation has been added to the Plan for the development of national policy or guidance to direct the control of hazardous waste shipments in order to facilitate self-sufficiency in hazardous waste treatment where this is technically, economically, strategically and environmentally advisable.</p> <p>Noted.</p> <p>Waste Acceptance Criteria is subject to the licensing application process, and post-issue enforcement protocols.</p>

	<p>Proposed Revised Plan does not cover the issue of whether a hazardous and non-hazardous waste-to energy facility should be co-located. This is common in Europe and elsewhere. Significant advantages of such co-location include economies of scale. Cost savings associated with plant infrastructure, additional site acquisition and statutory consents are made. Also adds robustness to a business where downturn in profitability of handling one waste stream can be offset from revenue gain by processing other waste types. Considering the Proposed Revised Plan states the need for indigenous hazardous waste infrastructure of all kinds, would welcome the final Plan to indicate support for co-located waste-to-energy capability to be established in Ireland.</p>	<p>For consistency, text has been added to the Plan to indicate that Consideration should be given to co-location of hazardous waste treatment at existing waste facilities or brownfield sites for the purposes of sustainability and land-use planning. Any proposals for hazardous waste treatment will of course be subject to their own planning and licensing/permitting processes including the assessment of environmental impacts.</p>
30	<p>To date EU market had no difficulty servicing needs of Irish hazardous waste producers. No indication of change to this in foreseeable future. Prudent that the new Plan seeks to engage with industry players on an ongoing basis to understand how this capacity is impacted and what might happen in the future. Regarding review of the provision/facilitation of hazardous waste treatment capacity, recommendation should also include formal engagement with industry stakeholders especially as they seek to make licence applications.</p> <p>It is erroneous to simply conclude that solvent recycling (R2) competes directly against its use as a fuel (R1) – Where high value solvents are involved (e.g. Tetrahydrofuran) it is nearly always more beneficial to submit the material to R2 processing due to the inherent value of the material than its use as a fuel. Only when mixtures are complex and not easily separated, does R1 use become a competing option, or when there is no downstream use for the recovered material due to its low quality or contaminants.</p> <p>It is naive to consider that the cost for handling asbestos waste in an Irish landfill will differ significantly from export for landfill abroad. The unit cost for the Irish facility will be higher due to the volume available for landfill</p>	<p>Text has been added to the Plan to indicate that in order to facilitate an on-going understanding of hazardous waste treatment capacity needs, the EPA will prepare and maintain, in consultation with various stakeholders, an inventory of national hazardous waste recovery and disposal capacity.</p> <p>Text has been amended to state that for the purposes of comparison, solvent recycling (R2) is also shown.</p> <p>The Plan states that the cost of exporting asbestos waste is prohibitive, particularly for small scale or DIY operators. This is in all likelihood driving asbestos towards being unreported or illegally</p>

	<p>and as a D code it will be obvious that any operator would seek to maximise the financial return as export would be prohibited.</p> <p>Submission welcomes self-sufficiency but only at a competitive cost. Irish waste producers should have alternatives at competitive costs within the principles of BAT.</p> <p>Remove or modify the specific target in Table 28 'reduce export of hazardous waste'. This is not a useful target as it may be our primary solution into the future for difficult wastes.</p>	<p>disposed. It is proposed that in the absence of a dedicated national facility and considering the prohibitive export costs for this stream that additional capacity be provided at specialist cells in a limited number of existing non-hazardous landfills to prevent illegal disposal of asbestos and to take account of increased promotion of legal collections of asbestos<sup>1</sup>.</p> <p>The Plan recognises and states that hazardous waste destined for recovery is subject to an open and competitive waste market in the EU. Furthermore the Plan states the EPA, through this revised Plan, continues to encourage the development and introduction of new and innovative technologies and techniques for treating hazardous waste where they meet legislative, regulatory, policy and BAT criteria.</p> <p>One of the four objectives of the Plan is to strive for self-sufficiency and to minimise hazardous waste export. Such self-sufficiency is advocated in the Plan only where it is 'strategically advisable, and economically and technically feasible'. The Plan also states that hazardous waste for recovery is subject to an open and competitive waste market in the EU.</p>
31	<p>Murphy Environmental Hollywood Ltd (MEHL) currently operate at a licensed inert landfill in Dublin. Granted planning permission for an integrated waste management facility at an existing landfill in Dublin (which will allow for acceptable of, <i>inter alia</i>, hazardous waste). Licence application is currently being assessed by EPA. Residual waste landfill capacity is recognised as an integral part of the waste hierarchy and facilitates waste management infrastructure. The MEHL facility will offer co-located landfill disposal capacity under all classes of landfill (inert, non-hazardous and hazardous). Development of the facility is supported by</p>	<p>Text has been added to the Plan indicating that it is noted that an application for a licence review has been submitted to the EPA, which includes the development of a hazardous waste facility for the engineered landfill of contaminated soil and fly-ash containing dangerous substances (the application does not include asbestos disposal). This application is subject to a full environmental assessment and industrial emissions licence determination process.</p>

<sup>1</sup> In chapter 5, a network of asbestos transfer stations operating from civic amenity sites is proposed. The availability of drop off facilities at equitable cost should minimise the illegal disposal or backyard accumulation of asbestos.

	<p>NHWMP 2008-2012, EU waste policy on self-sufficiency, waste management plans adopted in Republic and the North acknowledging the need for all-island solutions to hazardous waste, deficiency in Ireland's infrastructure in managing hazardous waste which is vital for economic development (spin-offs, economic opportunities foregone as waste is exported). Other supports include reduction in greenhouse gases and risk associated with waste shipments. MEHL facility will facilitate waste management solutions in line with the waste hierarchy. Regarding strategic need for possible public provision of hazardous waste treatment, MEHL proposals for a licensed hazardous waste landfill are at an advanced stage. Refers to 2<sup>nd</sup> Plan's objectives, SEA environmental targets on indigenous waste treatment and reducing exports, Ireland not meeting targets, need for national/all-island infrastructure. Regarding overarching need for securing long term disposal arrangements, MEHL proposed facility offers long term disposal solution for certain hazardous wastes, subject to strict Waste Acceptance Criteria. Regarding recognition that landfill for some non-recoverable or non-combustible hazardous wastes is needed, residual disposal is an accepted element of the waste hierarchy and MEHL support striving towards self-sufficiency. Regarding hurdles to development of hazardous waste landfill, MEHL proposals for a licensed hazardous waste landfill are at an advanced stage. Proposals do not include provision for the disposal of asbestos. Regarding possibility for provision of all-island landfill capacity, MEHL proposals make provision for the potential acceptance of hazardous waste (excluding asbestos) from Northern Ireland based on stated government policy. Regarding call for DECLG to consider use of appropriate economic or other instruments to ensure provision of necessary disposal capacity, MEHL would call for clear, decisive and timely policy on the possible instruments/incentives cited and would welcome further discussion on this. Concerning increase off-site treatment/landfill of hazardous waste, MEHL proposals for a licensed hazardous waste landfill are at an advanced stage. Appears that the following text from NHWMP 2008-2012 (pg 69) has been omitted and requests to consider reintroducing the text: "It is recommended that at</p>	
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	<p>least one hazardous waste landfill be developed in Ireland, capable of accepting the wide range of hazardous wastes that would otherwise be exported for landfill. Such a facility would be expected to provide a key national service and should have an available capacity of at least 25,000 tonnes per annum. A national facility should facilitate good transport links with the main urban and industrial centres. The facility could be co-located with an existing or planned landfill facility with the objective of utilising existing infrastructure such as site roads, weighbridges and staff facilities, thereby saving costs.” National Waste Reports for 2009, 2010, 2011 cite MEHL proposal including hazardous landfill capacity. Consider inclusion of similar reference in the Proposed Revised NHWMP.</p> <p>Table 25 indicates a current need for approx. 10,000-15,000 tonnes of capacity per annum – MELH considers these volumes to be underestimated vis-à-vis data in NaDWaF study and MEHL EIS. This estimate could undermine information already presented in NHWMP 2008-2012 and NaDWaF study (e.g. pg 9 of this study shows up to 2019, 235,000-260,000 tonnes per annum of hazardous landfill capacity required). Regarding NaDWaF study and Table 26 tonnages potentially suitable for hazardous waste landfill – Conflicts with tonnages presented in Table 25.</p>	<p>The estimate of a 10,000-15,000 tonne capacity need takes into consideration the actual volumes exported for hazardous waste landfill in 2010 and 2011. The Plan also includes NaDWaF estimated capacity needs which include projected waste arisings from Northern Ireland. The Plan states that DECLG should keep under review the provision of hazardous waste treatment capacity (e.g. hazardous waste landfill capacity), taking into account the information from the Plan and the findings of the NaDWaf study. The Plan states that options for private sector investment are presented solely as options and the Plan does not seek to carry out a detailed evaluation of the actual economic feasibility of any such potential investments.</p>
<p><b>32</b></p>	<p>For consistency with the analysis on pg 73, <i>“It is a recommended objective of this Proposed Revised Plan to reduce export and increase indigenous (including on-site) treatment of hazardous waste <u>where strategically advisable and economically and technically feasible...</u>”</i></p> <p>Text amendment - Regarding solvent recycling, <i>“Such promotion and support would require parallel efforts to market recycled solvent in Ireland and the assistance of the <b>North/ South</b> Market Development Group may be appropriate in this regard.”</i></p>	<p>Text amendment made.</p> <p>Text amendment made.</p>

	<p>Text amendment - Regarding physico-chemical treatment, <i>“Provision of capacity for the pre-treatment of the following hazardous waste streams is in particular recommended (though <b>business supports from enterprise agencies</b> should not necessarily be confined to this non-exhaustive list of wastes)”?</i></p> <p>Worth noting that self-sufficiency must be achieved only in an economically sustainable situation into the future. Section (in Executive Summary) may also possibly refer to the newly developed options being delivered via cement kilns in Ireland for solvents and the expanded range of material that may be included under current licences issued by the Agency but has yet to be constructed / implemented.</p>	<p>Text amendment made.</p> <p>The Plan recommends self-sufficiency where strategically advisable, and technically and economically feasible. Options for hazardous waste treatment, including use of cement kilns, are described under Chapter 6 of the Plan.</p>
<b>Legislation</b>		
	<b>Submission</b>	<b>Response</b>
<b>33</b>	<p>Concerning Section 2.4 regarding the Commission review of the List of Waste and hazardous waste properties, a timeline of this work is relevant in the context of the development of the new Regional Waste Management Plans.</p> <p>Section 2.5.8 refers to transport of small quantities of hazardous waste which must be covered by a waste collection permit. A review of waste collection permit exemptions in consultation with the National Waste Collection Permit Office to address this matter is suggested.</p>	<p>Commission review of the List of Waste is currently underway and adoption of amendments to the Decision on the List of Waste is dependent on progress at EU level.</p> <p>A specific recommendation has been added to the Plan to carry out a review of waste licensing and permitting legislation in order to establish a proportionate regulatory mechanism, including relief, to facilitate collection, transport, take-back and temporary storage of certain hazardous wastes arising from small sources.</p>
<b>34</b>	<p>Many HSE staff and other healthcare providers transport hazardous waste such as sharps boxes between healthcare sites including domiciliary care. The trend is towards providing as much healthcare as possible in the home or community and so these activities are likely to increase. Household members also become responsible for the disposal of healthcare waste as a result of these activities. Current practice may leave individual staff members vulnerable to prosecution by the EPA should an incident occur and where</p>	<p>A specific recommendation has been added to the Plan to carry out a review of waste licensing and permitting legislation in order to establish a proportionate regulatory mechanism, including relief, to facilitate collection, transport, take-back and temporary storage of certain hazardous wastes arising from small sources.</p>

	<p>the EPA could be asked by a member of the public to invoke legislation in relation to transportation of hazardous waste. There may be need for authorisation and insurance from healthcare employers to and from domiciliary care, as in a “depot-based healthcare” system.</p> <p>Engagement between healthcare organisations and the EPA on this specific issue may require the development of procedures that are compliant with hazardous waste legislation as well as meeting healthcare needs. Submission welcomes a risk based approach to consider healthcare activity benefits as well as healthcare waste risks associated with this activity.</p>	See above.
35	Proposed new WEEE legislation recommends separation of WEEE for re-use. May require revised reception and storage protocols at Civic Amenity sites.	New national WEEE regulations are now in place and require that separately collected WEEE is treated in accordance with WEEELABEX normative requirements or any other equivalent EN treatment standards.
36	<p>EPA is bound by Article 28 of Waste Framework Directive regardless whether or not provisions are set out in national law. Section 26 (1) and (2) of Waste Management Act requires clear objectives and policies which the EPA consider necessary to improve different aspects of hazardous waste lifecycles. Section 26 (2)(b) requires objectives as well as targets if necessary. Section 26 (2)(f) requires recommendations about how hazardous waste should be managed (e.g., priorities, desired level of infrastructure, waste facilities and other physical resources considered necessary throughout the State and functions of other public authorities). Waste Management Act is clear that NHWMP should not be viewed in isolation but that requirements need to be integrated in the three regional waste management plans being prepared.</p>	<p>It is considered that the Plan has been prepared in accordance with Section 26 of the Waste Management Act as amended. Note that Section 26 (5) of the Waste Management Act as amended requires ‘A Minister of the Government, a local authority and any other public authority in whom are vested functions by or under any enactment in relation to the protection of the environment shall have regard to, and in so far as it is considered by that Minister of the Government, local authority or other public authority to be appropriate to do so, shall take measures to implement or otherwise give effect to, recommendation contained in the hazardous waste management Plan.’ The following text has been added to the Plan:</p> <p>‘Preparation of regional waste management plans should consider treatment options that are highlighted in this Plan and take measures to plan for such treatment, where considered strategically advisable, economically and technically feasible, in order to help improve Ireland’s self-sufficiency in hazardous waste treatment.’</p>

<p>Section 26(5) mandates government/public authorities/local authorities with environmental protection responsibilities to have regard to the NHWMP and take measures to implement EPA’s Plan policies.</p> <p>Other legislation requires the content of the NHWMP to be considered. Policies set out in the EPA’s Plan are a material consideration in relation to applications for development consent under the Planning and Development Act. Section 34 (2) (a) (i) considers planning applications compatibility with local area’s Development Plan.</p> <p>In this respect Section 22 (10A) requires the consideration of a planning application to have regard to both Development Plan and Regional Waste Management Plans (RWMPs) and if there is a conflict between such plans’ objectives, the RWMP takes precedence. Legislation concerning planning applications focus more on development plans and RWMPs as opposed to the NHWMP as there is an assumption that the objectives of the EPA’s Plan are fully reflected in the RWMP. Therefore it is necessary for EPA requirements in the NHWMP to be clear so that they are translated into the RWMPs. If they fail to be clear as they might be, then they will struggle to be reflected in the RWMPs. Subsequently NHWMP requirements may not be taken fully into account during the consideration of planning consents under Planning and Development Act (e.g. EPA policy favouring a particular type of hazardous waste infrastructure may not be given adequate level of consideration).</p> <p>EPA NHWMP policies also have other statutory relevance. For example, Waste Management Collection Permit Regulations 2007 (one or more conditions can be included to give effect to NHWMP), Waste Management (Facility Permit and Registration) Regulations 2007 (no. of permits issued to control small scale hazardous waste storage and treatment facilities (household hazardous waste, hazardous waste in WEEE, ELVs, scrap metal, dredgings and batteries)). Concerned that draft NHWMP does not appear</p>	<p>See above.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p>
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<p>to give any indication to Local Authorities of what requirements the EPA would like to see reflected in waste collection permits and waste facility permits issued to hazardous waste sector. Submission considers that the draft text expresses its requirements as recommendations rather than as clear policy statements. Accepts that this may be due to how Waste Management Act is drafted (Article 26 (2) (f) – recommendations). However 26 (2) (b) requires the EPA to specify its objectives and, if appropriate, targets. EPA seems to use ‘recommend’ or ‘recommendation’ extensively in its draft NHWMP. Despite this use of term, it seems expected, and in the context of Section 26 of the Waste Management Act that the EPA’s requirements and policies are to be added to the text of the RWMPs.</p> <p>Submission does not expect the EPA to express policies beyond the capacity of national legislation and notes the Proposed Revised Plan’s recognition that the public sector is not likely to be involved in the provision of hazardous waste infrastructure or control private sector investment.</p> <p>Submission considers that the EPA needs to express a much clearer strategic vision for the hazardous waste sector than what is expressed in the current text. Submission provides an example of this point in the current text of how problems can arise (Regarding asbestos <i>‘The Proposed Revised Plan reiterates the previous Plan’s suggestion that a network of collection and transfer facilities be established to capture the small-scale arisings from DIY and small contracting jobs’</i>). If this was an EPA requirement as opposed to a consideration then it becomes embedded in a RWMP and a matter of significance in relation to a development plan/planning applications.</p> <p>Another example regarding the plan’s perceived lack of clarity is pg 79 (<i>..it is recommended that the combustion of blended solvent should be facilitated in Ireland within the constraints of planning requirements, IPPC</i></p>	<p>See above.</p> <p>The Plan is a revision of NHWMP 2008-2012 with the principal components of the NHWMP 2008-2012 left in place. Government policy states that the NHWMP is a strategic level document designed to provide overall direction to policy and decision makers involved in the prevention and management of hazardous waste. Concerning the example, the text has been amended to state that ‘This revised Plan continues to recommend that a network of collection and transfer facilities be established to capture the small-scale arisings from DIY and small contracting jobs.’ This particular example also forms part of a recommendation in the Plan.</p> <p>‘Facilitated’ is used in the context that the treatment option should be supported as long as legislation is complied with. As the treatment option is specified in the Plan, the RWMPs should assess the feasibility</p>
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	<p><i>licences and the waste incineration directive in preference of export</i>). Submission questions what does this mean ('facilitated'). Lack of clarity makes it difficult to be reflected in RWMPs in a way that is a relevant consideration in the context of planning applications for waste infrastructure.</p>	<p>of such options being supported in their own plans. The following text has also been added to the Plan 'Preparation of regional waste management plans should consider treatment options that are highlighted in this Plan and take measures to plan for such treatment, where considered strategically advisable, economically and technically feasible, in order to help improve Ireland's self-sufficiency in hazardous waste treatment.'</p>
37	<p>Submission makes reference to recommendations in the Proposed Revised Plan in terms of legislative changes concerning collection permits for the transport of small quantities of hazardous waste and a regional enforcement approach to producer responsibility obligations.</p>	<p>The Plan includes the following relevant recommendations:</p> <ul style="list-style-type: none"> <li>• Consolidate and reform existing regulations where appropriate, and make provision for new hazardous waste regulations where the need becomes apparent during implementation of this revised Plan.</li> <li>• Carry out a review of waste licensing and permitting legislation in order to establish a proportionate regulatory mechanism, including relief, to facilitate collection, transport, take-back and temporary storage of certain hazardous wastes arising from small sources.</li> <li>• Continue to carry out awareness raising and enforcement to ensure improved hazardous waste collection from small-scale hazardous waste streams (e.g. waste oils from garages).</li> </ul>
38	<p>Simplification of legislation as a target of the new Plan would be welcome. Greater enforcement on non-compliant entities who continue to operate outside of licensing (e.g. illegal waste oil burning and criminal fuel laundering). Simplification of the consignment note has been welcome but further streamlining should be developed (as it is particularly a cost factor for small hazardous waste arisings). Regarding industrial estates and commercial clusters simplification of the consignment note system will help this sector as will engagement with the management/service companies of such estates. Further simplification of the internal</p>	<p>See above.</p>

	consignment note system would be beneficial and a defined target. Amalgamation of regulations may make some of the system easier to operate.	
39	Since the introduction of the Animal Remedies Directive veterinary practices have been wrestling with how they can offer a returns system for the remedies that are unused or expired. Understand that under current legislation a veterinary practice would require a waste transfer licence in order to receive unused or expired animal remedies which are discarded by the farmer.	The updated Plan includes a recommendation to carry out a review of waste licensing and permitting legislation in order to establish a proportionate regulatory mechanism, including relief, to facilitate collection, transport, take-back and temporary storage of certain hazardous wastes arising from small sources.
40	Suggested amendments to permit for small-scale services to be considered carefully with input from Local Authorities to avoid practical/enforcement difficulties. Ensure that new rules do not become cumbersome.	See above reference to recommendations regarding legislation concerning collection of waste. The Plan also provides an update regarding the current review of the respective regulatory and enforcement roles of the Environmental Protection Agency and local authorities.
41	Political agreement has been reached between the Council and the European Parliament on the new Regulation concerning the Fluorinated Greenhouse Gas Regulation and it is anticipated that it will be in force on 1st January 2015. The Waste Management (Packaging) Regulations, S.I. No. 798 of 2007, should be added to the list of legislation in the Plan.	Legislation section of the Plan has been updated.
<b>Enforcement</b>		
	<b>Submission</b>	<b>Response</b>
42	Submission supports continuation and improvement of control efforts in relation to the unauthorised use of waste oil in burners and other challenging areas, implementation of best practice radioactive waste control measures and the objective ' <i>to protect human health from hazardous waste</i> '.	Noted. Radioactive waste is included under Article 2 (Exclusions from the scope) of Waste Framework Directive (2008/98/EC) and is outside the scope of the NHWMP.
43	Biggest hazardous waste issue in local authority (border county) is illegal dumping of diesel laundering residues. There has been a dramatic escalation of this in recent years, 2013 being the most problematic year to	The Plan provides a further update regarding the current review of the respective regulatory and enforcement roles of the EPA and local authorities including that a final outcome of the review is expected in

	<p>date. 126 separate incidents and over 500,000 kg of illegally dumped wash waste dealt with in 2013 (up to the time of writing (13<sup>th</sup> November 2013)). More needs to be done at government level to address this issue. A proposed new 'marker' system will not solve the problem. Submission proposes that the only solution would be to eliminate agricultural diesel and to introduce a subsidy system for farmers.</p> <p>The Waste Management Act is a tool being used by Gardaí/DPP to prosecute offenders, however Government needs to tackle the real issue of serious criminality in the region and huge profits being made from this activity (e.g. use of Criminal Assets Bureau or something similar to be given more powers). Expect fines arising from prosecution under the Waste Management Act to be minimal.</p> <p>Gardaí are not authorised persons under the Waste Management Act and therefore raids involving staff from the Local Authority are called upon. As a result there is genuine security concerns for staff (well known that serious criminal gangs with possible paramilitary connections are working along the border). Submission argues that this is a unique issue in border counties and questions the involvement of local authority waste enforcement personnel. Submission encourages the fast tracking of the proposal in the 2012 'Resource Opportunity' policy document for a dedicated team of enforcement officers to tackle serious criminality.</p>	<p>2014. The review includes the issue of tackling serious criminality. A recommendation has been added to the Plan for the DECLG to assist relevant Departments and Agencies to examine the feasibility of alternatives to the diesel fuel marking system that can help eliminate illegal diesel laundering operations and prevent the generation of hazardous waste and associated environmental clean-up costs arising from such activities.</p> <p>See above.</p> <p>See above.</p>
44	<p>Concerning unauthorised waste oil burning, reasonable to expect the NHWMP to contain policies that require restrictions in waste collection permits (e.g. prevent waste oil being consigned to garages and other premises that operate unauthorised waste oil burners).</p>	<p>Burning of waste oil is subject to legislative requirements (i.e. requires a licence). Plan recommends that the relevant authorities continue to carry out awareness raising and enforcement to ensure improved hazardous waste collection from small-scale hazardous waste streams (e.g. waste oils from garages).</p>
45	<p>Garages require significant enforcement and monitoring and submission recommends that EPA and Local Authorities develop a Plan to ensure that</p>	<p>See above.</p>

	garages can prove correct environmental management of wastes.	
<b>46</b>	<p>May be worth specifically referring to waste oil and fuel laundering wastes in the Executive Summary as these would appear to be the least managed wastes and pose the largest risks to our environment due to lack of control/enforcement that exists in these areas.</p> <p>Garages and other vehicle service and dismantling locations require significant enforcement. Due to size and wide geographical spread of operations, local authorities will need to be properly trained and incentivised to fulfill inspection role and EPA to enforce proper sanction if on-going non-compliance is detected.</p> <p>Regarding enforcement, place particular emphasis on waste oil management, de-pollution of ELVs and illegal diesel laundering. Current level of enforcement is wholly unsatisfactory.</p> <p>Suspects that there is still a significant amount of waste oil being blended illegally for use in boilers. EPA should carry out a full risk assessment of this activity and if necessary more enforcement should be applied to stop this.</p> <p>Illegal fuel laundering enforcement activities should involve checks on vehicles using laundered fuel. Would involve discussion with Gardaí and Revenue but requires attention in the Plan.</p> <p>ELV area has seen a serious lack of enforcement. Number of IWMA members has ceased activity in this area due to illegal operators continuing to operate and undercutting compliant players.</p> <p>Unreported hazardous waste area requires further effort and key to this is</p>	<p>These issues are highlighted as enforcement challenges in the Plan. Text has been added to the Executive Summary indicating that enforcement activities should continue to focus on such issues such as unauthorised burning of waste oil in order to increase collection and prevent environmental pollution.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p> <p>Further text has been added to the Plan indicating that DECLG are currently considering a number of measures aimed to address difficulties concerning ELVs and new regulatory structures are expected to be in place by 2015.</p> <p>See above.</p>

	focused enforcement.	
<b>Collection / unreported waste / hazardous waste from small sources</b>		
	<b>Submission</b>	<b>Response</b>
<b>47</b>	<p>Regarding recommendation for a network of collection and transfer facilities to capture small asbestos arisings, such facilities would require specialist training. The funding and education/awareness requirements should be clarified. Clarification necessary on funding and level of investment required by Local Authorities regarding prevention, enforcement and awareness activities. Funding/resources remain a challenge concerning Local Authorities availing of contract mobile collection services.</p> <p>Concerning drop off facilities to tackle unreported hazardous waste from householders and businesses, the location, management and numbers required need to be addressed.</p> <p>Confirmation on existing capacity of civic amenity sites to handle household hazardous waste would support their planning and inform the new Regional Waste Management Plans.</p> <p>Funding and resources required from DECLG in order to facilitate</p>	<p>NHWMP is a strategic level document designed to provide overall direction to policy and decision makers. Regional waste management plans have a responsibility for implementing measures to give effect to relevant recommendations in the NHWMP. It is considered that this would include identifying the funding needed to put in place the infrastructure to achieve the plans' recommendations at local or regional level. The Plan makes a number of references to the potential role that producer responsibility initiatives may play in relation to funding. The Plan also amends the recommendation concerning the provision of resources to Local Authorities to reflect the potential role of PRIs:</p> <p>'Plan and make provision for resourcing local authorities to develop adequate collection facilities for small-scale quantities of hazardous waste from households and small businesses (e.g. at civic amenity sites, mobile special collections). This could include resourcing through sectoral agreements and the development of potential new producer responsibility obligations for certain hazardous waste streams.'</p> <p>See above.</p> <p>See above. This is considered to be within the scope of the preparation of the regional waste management plans which are responsible for implementing measures to give effect to recommendations in the NHWMP.</p> <p>See above.</p>

	<p>additional household hazardous waste at civic amenity sites.</p> <p>Successful implementation of the Proposed Revised Plan is dependent on funding recommendations being fulfilled by the DECLG. Supports EPA in engagement with the DECLG in relation to allocation of resources to Local Authorities.</p> <p>Permitting business users on Civic Amenity sites may not be feasible, due to space, financial and personnel resource issues. More favoured options are retailer take-back schemes/initiatives as part of PRIs and direct business collections (e.g. mobile units).</p> <p>Regarding Section 5.2.2 on collective approach by local authorities (e.g. sharing of information via on-line pre-registration services), further information is welcome on the existence of an on-line registration system, its administration and opportunities for Local Authorities to avail of this system.</p> <p>Concerning Appendix B, Table 32, submission lists 8 additional facilities operating in Dublin City Council's administrative area that are currently permitted to accept certain hazardous wastes.</p>	<p>See above.</p> <p>See above. The Plan has been updated to indicate that such provisions should be made where considered feasible.</p> <p>See above. The Plan does not indicate that such a system is currently available. It is a recommended collective approach.</p> <p>Listed facilities have been added to the relevant Appendix. Further text has been added to the footnote to check with Local Authorities for facilities that are permitted to accept certain hazardous wastes.</p>
48	<p>Company making submission is a stakeholder in the collection of potentially infectious wastes from self-administering patients in the home and in the collection of hazardous wastes and the operators of treatment facilities. Would welcome the opportunity to engage with any working review panel the EPA may establish.</p> <p>Often undertake the collection from self-administering patients on behalf of the manufacturer of the product or medication. Understand that the requirement for a waste transfer form is relaxed for collection from home patients. The requirements placed on the carrier of dangerous goods under the Carriage of Dangerous Goods by Road</p>	<p>The National Waste Prevention Committee acts as principal stakeholder oversight body for the Plan's implementation and can participate in sub-groups that may be established for specific purposes, as may be decided by the Committee.</p> <p>Collection and transport of hazardous waste are subject to regulatory requirements such as the Waste Management (Collection Permit) Regulations (S.I. No 820 of 2007) and the European Communities (Shipments of Waste exclusively within Ireland) Regulations (S.I. No 324 of 2011). The Plan recommends a review of waste licensing/permitting</p>

	<p>Regulations still apply. Licensed carrier of dangerous goods will have their vehicles kitted out and compliant, drivers Hazchem trained, DGSA appointed and the requirements of any collection permit do not create a significant barrier to the licensed operator.</p> <p>Company making submission holds an EPA licence to treat potentially infectious wastes but is prohibited from receiving waste from non-waste collection permit holders. Company could not legally receive waste directly from home producers, it can only be received from licensed waste carriers.</p> <p>Suppliers of product onto the Irish market have engaged either with waste collectors, home therapy service providers and pharmacies to help manage potentially infectious waste from home patients.</p>	<p>legislation in order to establish a proportionate regulatory mechanism, including relief, to facilitate collection, transport and temporary storage of certain hazardous wastes arising from small sources.</p> <p>See above.</p> <p>Noted.</p>
49	<p>Submission does not agree with SMEs delivering their own hazardous waste to civic amenities/collection points due to risks to standards, compliance requirements and the environment.</p>	<p>See above regarding legislative requirements concerning transport of waste and associated recommendation in the Plan.</p>
50	<p>Suggest that a regular system for the collection of household hazardous waste is made by each local authority as many households do not have a car.</p>	<p>There is a recommendation in the Plan to plan and make provision for resourcing local authorities to develop adequate collection facilities for small-scale quantities of hazardous waste from households and small businesses (e.g. at civic amenity sites, mobile special collections). This could include resourcing through sectoral agreements and the development of potential new producer responsibility obligations for certain hazardous waste streams</p>
51	<p>Regarding ELVs, no facility in Dun Laoghaire-Rathdown County Council (DLRCC) but considered that the Dublin region is sufficiently provided for.</p>	<p>Noted.</p>
52	<p>Regarding proposal to dispose a full range of hazardous waste for both household and businesses, an amendment to the licence/certificate of</p>	<p>NHWMP is a high level strategic document aimed at giving direction to policy and decision makers involved in the prevention and management</p>

	<p>authorisation may be required if the civic amenity site is only authorised to accept hazardous waste only from households. May necessitate revised terms of the existing operation contract, if managed by a contractor. Will be an increase in operating and training costs. Facility layout will require to be revised and footprint possibly extended. May not be possible at some DLRC sites.</p> <p>Two DLRC sites operate without any charge to the public. Unable to impose a charge due to security reasons. Acceptance of a full range of hazardous wastes would lead to increased financial burden, fire risks and insurance premiums and potential objections from adjacent residents/businesses.</p> <p>Concerning proposal for caps or quotas on waste disposed by businesses at civic amenity sites/recycling centres, this would increase administration burden.</p> <p>Concerning proposal for a collective contract by Local Authorities to manage deposited waste this may have negative effect on day to day operations, servicing of civic amenity sites, less flexibility. Current contracts appear to be competitive and easier to seek new contracts if service is inadequate.</p> <p>Concerning proposal for transfer station for small quantities of asbestos in each Local Authority or to contract out such a service, this may meet potential objections from residents and operating staff/contractor.</p> <p>On a collective approach by Local Authorities, there would be potential difficulties in providing similar services due to different types of businesses and an absence of a common pricing policy.</p> <p>There would be odour problems and objections from staff/contractor if</p>	<p>of hazardous waste. The provision of facilities for hazardous waste collection from householders and small business is considered a priority in managing hazardous waste from small sources, and the Plan sets out a number of suggested approaches to tackle these issues. It is considered the responsibility of Local Authorities through the preparation of the RWMPs to address which measures can be put in place to implement the recommendations in the Plan.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p> <p>See above.</p> <p>In relation to farm hazardous waste, the Plan recommends the</p>
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	civic amenity sites accept farm hazardous waste, including plastics.	completion of the farm hazardous waste collection pilot project and the publication of the pilot project report and recommendations so as to inform future management options for farm hazardous waste.
<b>53</b>	<p>Document indicates that commercial cost of dealing with this area (unreported hazardous waste) is prohibitive but it is necessary to bring the correct standards to bear to ensure compliance (this has significant cost).</p> <p>May be worth referring to high standards maintained in this sector in Ireland and that unreported or difficult elements are relatively small. If other EU statistics are available, some comparison should be made.</p> <p>Development of national network for collection of small scale asbestos arisings should be carried out in discussion with industry players in terms of standards and methodologies.</p> <p>Suggest that specific targets are set for increasing the volumes of waste oils and small arisings of hazardous wastes that are collected.</p>	<p>Plan indicates that commercial cost of employing services from the private hazardous waste industry is often prohibitive to small industry (infrequent waste generation and unit costs are high).</p> <p>Table 5 in the Plan concerning SEA Targets highlights the performance of hazardous waste facilities (e.g. exceedances in limits, no of complaints) following the interim review of the previous Plan. It is envisaged that the next review will carry out a similar analysis.</p> <p>The National Waste Prevention Committee is responsible for two way communication with sectoral and stakeholder interests. Further text has been added to the recommendation relating the collection of asbestos to engage with stakeholders on the development of appropriate operational conditions for such facilities.</p> <p>A new target has been added to Table 27 (Plan targets and indicators) to increase the collection of waste oils from smaller sources (e.g. garages).</p>
<b>Farm Hazardous Waste</b>		
	<b>Submission</b>	<b>Response</b>
<b>54</b>	Farm hazardous wastes can be complex. The knowledge base of any receiving location would need to be sufficiently deep and broad enough to correctly classify the wastes for packaging and transport under the Carriage of Dangerous Goods by Road Regulations. Civic amenity centres typically do not deal with complex hazardous streams and often out-source their hazardous waste bring days. Unlikely that staff would have the exposure to a wide enough variety of hazardous wastes to develop the required skill base.	A farm hazardous waste collection pilot project to inform possible options for farm hazardous waste collection was carried out in November 2013 which focussed on hazardous farm wastes such as animal and plant protection product containers, unused or out-of-date animal health medicines and pesticides, waste oils, oil filters, empty cartridges (e.g. grease guns), aerosols, WEEE, paints, batteries and other hazardous farm wastes. A report on the pilot project is currently being prepared and the Plan provides an update on the farm hazardous waste pilot project and

		recommends the publication of the report and associated findings and recommendations (interim report now available).
<b>55</b>	<p>A broad range of hazardous waste has accumulated on farms over many decades due to changes in farm practices (e.g., livestock into tillage farming, farm retirement scheme, cessation of cultivation of sugar beet). Also, large containers with a label for one product may now be the filled with an alternate hazardous waste (e.g. waste oil).</p> <p>Farm hazardous waste collection pilot completed at 6 sites.</p>	<p>See above.</p> <p>See above.</p>
<b>56</b>	Recent trial is welcomed however the suitability of locations where such wastes are delivered must be recognised (marts are hardly suitable).	See above.
<b>57</b>	Proposed revised NHWMP was discussed at a local authority's Environment, Corporate and Emergency Services Strategic Policy Committee meeting. Chair and members directed that the submission should indicate that serious consideration should be given to the establishment of a mechanism/scheme for the collection or localised deposition of farm hazardous waste. Should be user friendly and affordable to ensure such arisings are properly disposed of.	See above.
<b>58</b>	<p>Submission would welcome the publication of results of the farm hazardous waste collection trial to assist in developing an on-going solution. Transfer of pesticides (some of which are banned) to permitted collectors will be critical. Carrying out this on unpaved/gravelled grounds at uncontrolled facilities is a real potential issue for spillage, clean-up and insurance underwriters.</p> <p>Include publication of results of farm hazardous waste collection pilot.</p> <p>Risk of pollution / spillage occurring at the point of collection is significant. Must ensure that 'standards' are being maintained for even</p>	<p>See above.</p> <p>See above.</p> <p>See above.</p>

	small quantities of hazardous materials that may be collected via these expanded initiatives. This must be highlighted in this section.	
59	Clarification needed on the expansion, management and numbers required for the farm hazardous waste collection pilot scheme.	See above.
60	Disposal of spent pyrethroid dip has been associated with fish kills in rivers in UK. Unlike Ireland, UK sheep dippers require a licence to verify training in sheep dip use and disposal. Concerns regarding disposal of organophosphate sheep dip on farms and operator exposure, and any risk mitigation measures would be welcome. Considering new requirements for controls of wastewater, the practice of landspreading sheep dip may need to be revised.	The Plan recommends a study to evaluate and recommend an appropriate regulatory mechanism and relevant guidance for the management and disposal of spent sheep dip.
61	<p>Most farmers have moved fully away from the traditional old sheep dip type product which is seen as labour intensive. Sheep "Pour-ons" and "Mobile Shower Units" have replaced the traditional sheep dip trough. Sheep numbers in Ireland have significantly declined in the past decade and CSO figures on livestock numbers including sheep from 2005-2012 were provided.</p> <p>Question the basis of the calculated sheep dip figure of 20,195 tonnes as an updated position for 2011 of unreported hazardous waste from this sector and would appreciate information on which this figure was calculated.</p> <p>Veterinary medicines are available either on prescription prescribed by a veterinary practitioner or non-prescription supplied by licensed merchants. In the latter category are included anthelmintics and what are commonly referred to as sheep dip type products. However, this has now become more of a generic type name.</p> <p>Animal and Plant Health Association (APHA) are available as a stakeholder to work on the recommendation concerning the management and disposal of spent sheep dip.</p>	<p>See above.</p> <p>Data sourced from information provided by the Irish Medicines Board.</p> <p>Noted.</p> <p>Noted.</p>

<p>Recommendations made for inclusion in the Plan (reduction of hazardous waste generation by industry, society and agriculture, minimise unreported waste and work in partnership with all stakeholders and make constructive contributions based on up to date farming regulations and practices).</p> <p>Provides overview of recent legislation concerning the sustainable use of pesticides (S.I. 155 of 2012) including new requirements concerning retailers and distributors, the use of pesticides by professionals and amateurs, registration, inspections, record keeping, and training and awareness on their correct use and application. Where discrepancies are found, then there is a risk of penalties under the single farm payment. In principle there should not be a significant requirement for on-going disposal of pesticides, the ideal situation would be for both professional and amateur users to purchase their requirements for a single year and use that product as appropriate. Persons should not be purchasing large quantities and then failing to use it, resulting in a requirement for disposal at a later date.</p> <p>Submission provides text from the Animal Remedies Regulation (S.I. 786 of 2007) and outlines the difficulties associated with retail take back of animal remedies to outlets (e.g. handling of liquid hazardous waste, outlets store animal feed) and points out an existing system whereby licensed merchants were made aware of contact details of licensed national hazardous waste contractors that farmers could contact to arrange for their disposal.</p>	<p>It is considered that the Plan's objectives, recommendations and sectoral prevention plans (e.g. Agriculture Sectoral Prevention Plan) are relevant to this submission.</p> <p>Plan now makes reference to EU and national legislation concerning the sustainable use of pesticides including new requirements concerning retailers and distributors, the use of pesticides by professionals and amateurs, registration, inspections, record keeping, and training and awareness on their correct use and application.</p> <p>In 2012 the DECLG commenced a wide ranging review of existing producer responsibility agreements currently in operation in Ireland which is also examining the feasibility of the introduction of additional producer responsibility initiatives (PRI) for some waste streams, including hazardous wastes such as veterinary medicines. The DECLG PRI review is referred to in the Plan and the Plan recommends the assessment and development of potential new producer responsibility obligations for certain hazardous waste streams (e.g., a take back scheme for unused or expired human medicines), on foot of the recently established review of producer responsibility initiatives and detailed studies into priority hazardous waste streams. European Communities (Animal Remedies) (No 2) Regulations 2007 added to legislation section of the Plan.</p>
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	<p>Outlets such as veterinary practitioners and veterinary pharmacies may facilitate the disposal of farmer customer's veterinary medicines along with their own disposal requirements (charging for this service depends on the customer relationship).</p> <p>As a broad industry representative association, APHA are willing to assist and contribute within to the National Waste Prevention Committee (have not been invited to participate or contribute). Contributes to the EPA "Drinking Water and Pesticides" Committee.</p>	<p>See above.</p> <p>Noted.</p>
<b>Guidance and Awareness</b>		
	<b>Submission</b>	<b>Response</b>
<b>62</b>	Consultation with Local Authorities will be important in advance of the publication of the EPA code of practice on minimum operational and environmental standards for accepting waste at civic amenity sites.	The draft code of practice/guidance document has been sent to a Local Authority representative for comment.
<b>63</b>	Beneficial if draft Code of Practice on hazardous waste management at civic amenity sites, including training resources was available to Local Authorities for review.	See above.
<b>64</b>	Development of guidance notes for all civic amenity sites would be welcome. Industry sector would be keen to engage in their development. Code of Practice (on hazardous waste management at civic amenity sites) should also be agreed with industry stakeholders in advance.	The draft code of practice/guidance document has been sent to an industry body representative for comment.
<b>65</b>	Regarding Section 6.3 on options for alternative treatment techniques, consideration should be given to investing in the training and up skilling of regulators so that they are in a position to evaluate new technologies in a timely manner.	The Plan has included text that as alternative treatment techniques are commercially established, training and up-skilling of regulators should be supported with the assistance of industry and associated research institutes (e.g. via Continuous Professional Development).
<b>66</b>	Funding for third level institutes is important to develop waste and resource management modules and industry-led research projects as	The relevant table now highlights the necessity for funding to third level institutes in order to develop waste and resource management modules,

	part of civil and environmental engineering courses, as this will ensure that this area is adequately serviced with appropriately educated graduates. Would like to see specific reference to this in Table 18 as it is a key part in meeting the State's long term targets.	and industry led research projects so as to ensure availability of appropriately educated graduates in the areas of resource efficiency and waste management.
<b>67</b>	Submission proposes that all advertisements for hazardous waste items, such as paint, batteries be accompanied by clear information regarding their safe disposal. All sales persons in associated retail outlets should be advised to alert consumers purchasing such items of their responsibility and to also give them an information sheet.	The Plan indicates that for the purpose of guidance and awareness and continuous monitoring of hazardous waste management in Ireland, the EPA will prepare up to date factsheets on each of the main hazardous waste streams which will include information concerning the management of such waste streams. This will be carried out in the early part of the Plan period and made available on the EPA website ( <a href="http://www.hazardouswaste.ie">www.hazardouswaste.ie</a> ). The Plan also recommends for relevant bodies to conduct regular awareness and information campaigns (e.g., via social media), to pro-actively update and inform individuals and businesses of available hazardous waste collection services in their areas, as well as their legal obligations. The Plan further recommends the provision and dissemination of practical guidance on the management of sectoral hazardous waste (e.g., household, commercial, farming).
<b>68</b>	Submission proposes that the leaflet 'A Householders' Guide to Hazardous Waste Prevention' be updated to include data on all twenty six counties.	See above.
<b>69</b>	Regarding guidance and awareness campaigns to be at a national level with regional level modifications to be cost effective.  Concerning bye-laws on household hazardous waste management, guidelines, information campaigns and possible financial assistance via PRIs, DLRCC does not currently have this 'requirement'. Submission suggests posting EPA guidelines on its website and linking to be included on Local Authority websites.	See above.  See above. Local authorities will also have a responsibility for the provision of guidance and awareness concerning hazardous waste management.
<b>70</b>	Targeted seasonal/themed campaigns are useful to remind public and small producers of their legal responsibilities in terms of hazardous	See above.

	<p>materials. Industry will support these initiatives.</p> <p>Greater input in the area of education and dissemination of information will yield better prevention. This should be a key driver of the market.</p>	<p>Guidance and awareness is a priority in the Plan with a number of related recommendations included in this respect.</p>
<b>71</b>	<p>Educational awareness of the implications of the misuse and unlawful disposal of plant protection products and animal health products needs to be addressed across all sectors of the agricultural industry.</p> <p>Responsible use from a veterinary perspective is to prescribe the correct medicine for the diagnosed condition and issue a prescription accordingly. Farmers are business concerns that will not be purchasing excess veterinary medicines. Society in general should be guided to purchasing product as required, use as appropriate and then waste is minimised.</p> <p>Concern regarding the usage and disposal of animal/veterinary medicines and whether product literature conditions are being followed in practice.</p>	<p>This is relevant to the recommendation for relevant bodies to conduct regular awareness and information campaigns (e.g., via social media), to pro-actively update and inform individuals and businesses of available hazardous waste collection services in their areas, as well as their legal obligations. The Plan further recommends the provision and dissemination of practical guidance on the management of sectoral hazardous waste (e.g., household, commercial, farming).</p> <p>See above.</p> <p>See above.</p>
<b>Hazardous Waste Data</b>		
	<b>Submission</b>	<b>Response</b>
<b>72</b>	<p>Concerning the recommendation for the EPA to devise sectoral and waste stream specific indicators, a timeline of these indicators is relevant in the context of the development of the new Regional Waste Management Plans.</p>	<p>The Plan indicates that EPA will devise sectoral and waste stream specific indicators in the early part of the revised Plan period to help monitor implementation of the revised Plan's objectives. Text has also been added to indicate that the EPA in consultation with relevant bodies will prepare and make available key hazardous waste data indicators at regular intervals.</p>
<b>73</b>	<p>Useful to quote other economic indicators in terms of overall</p>	<p>It is envisaged that this will be informed by the above activity.</p>

	<p>production levels of hazardous waste for comparison purposes e.g. Hazardous Waste Production V GDP of the sectors involved.</p> <p>ISUS projections are unreliable. Better benchmark is possible through discussion with current largest producers and the industry that services this sector.</p>	<p>It is envisaged that this will be informed by the above activity in addition to a new recommendation in the Plan for the EPA to prepare and maintain, in consultation with various stakeholders an inventory of national hazardous waste recovery and disposal capacity.</p>
<b>74</b>	<p>For the purpose of calculating and minimising distance of hazardous waste movements, clarification is requested on the mechanism to track/monitor such movements and how the waste tracking system could contribute.</p>	<p>It is envisaged that this will be informed by the above activity in consultation with relevant bodies (e.g. NTFSO).</p>
<b>75</b>	<p>Waste figures in the Proposed Revised Plan are three years old. More relevant to include 2012 hazardous waste data. Such data would highlight that indigenous recovery/disposal options are being used and efforts to find local sustainable and appropriate solutions have been successful. Some top-line indicators detailing R and D codes and ultimate countries of destination would be beneficial.</p>	<p>The National Waste Report for 2012 has not yet been published. A graph has been added to the Plan to illustrate the trend between 2006 and 2011 in the recovery and disposal of hazardous waste generated in Ireland. It indicates that whilst there has been a reduction in both recovery and disposal of hazardous waste on-site at industry, the overall trend shows a move towards waste recovery with significant increases in the quantity of hazardous waste sent both for recovery off-site in Ireland and abroad. In general terms there has been overall decline in the quantity of waste sent for disposal.</p>
<b>76</b>	<p>Progress is considered in terms of the last Plan and 2011 data. With the advent of NTFSO, expect that more current data is available which may modify the view. Current market factors should be considered (i.e. Irish cement kilns accepting material and current waste licences in place).</p> <p>Availability of 'real time' data would be beneficial rather than depending on two year old data (2011). Recognises the challenges but key numbers/indices would be beneficial for planning purposes.</p> <p>Helpful if annual statistics highlight actual end uses for the material</p>	<p>See above.</p> <p>See above.</p> <p>See above.</p>

	(trend has been away from disposal to use as support fuels in various facilities). Current system of reporting simple D/R codes (Table 13) does not reflect this fundamental change which is to be welcomed as a development.	
77	Recommendation that the indicator for human health 'minimise complaints relating to hazardous waste facilities' should also take consideration of hazardous waste risks experienced in relation to other sites.	Submission does not specify or propose other sites. This would be difficult to report and to quantify.
<b>North/South Cooperation</b>		
	<b>Submission</b>	<b>Response</b>
78	<p>Recommendation for DECLG to initiate north-south cooperation is welcomed. All-island approach to capacity planning would have an impact on the Proposed Regional Waste Management Plans.</p> <p>Clarification is required on how an export levy might be applied, collected and monitored and responsibility for same.</p>	<p>Noted.</p> <p>An export levy is suggested in the Plan as a possible instrument for DECLG to use in the provision of hazardous waste treatment capacity. The Plan recommends that the DECLG, in consultation with relevant stakeholders, keep under review the provision and facilitation of hazardous waste treatment capacity and make recommendations on the appropriate economic or other instruments necessary for such capacity to be provided, either by the private or public sector. The Plan also recommends the development of a national policy or guidance to direct the control of hazardous waste shipments in order to facilitate self-sufficiency in hazardous waste treatment where this is technically, economically, strategically and environmentally advisable.</p>
79	Submission supports an island hazardous waste management plan in relation to farm waste.	The Plan recommends that the DECLG seek to establish a north-south cooperative group working on hazardous waste issues. It is envisaged that hazardous waste issues includes farm hazardous waste.
80	North South cooperation is sensible provided that equal standards are adhered to in both jurisdictions. Include comment that this is supported	The priority is to establish a north-south cooperative group working on hazardous waste issues in the first instance. It is envisaged that the issue

	provided that the same standards are being applied both jurisdictions.	of standards would be considered in such a group.
<b>Legacy Issue</b>		
	<b>Submission</b>	<b>Response</b>
<b>81</b>	Encouraging to see the legacy issue is being addressed. As a commitment to ensuring best practice, Engineers Ireland has established a register of professionally competent persons (Chartered Engineers) to conduct technical, risk based assessment certification of these legacy sites (i.e. historical landfill sites and contaminated land sites). Register is available to all public contracting authorities such as Local Authorities, EPA, NPWS and OPW. Submission enclosed the State of Ireland Reports (A review of infrastructure in Ireland) for 2013, 2012, 2011. These reports consider key areas of infrastructure including waste.	Noted.