

Philippa King  
Regional Waste Coordinator  
Southern Region Waste Management Office  
Limerick County Council  
Lissanalta House  
Dooradoyle  
County Limerick  
Email: [info@srwmo.ie](mailto:info@srwmo.ie)

29 January 2015

**Re: Ibec Submission under consultation on Southern Draft Regional Waste Management Plan**

Dear Philippa,

Ibec is grateful for the opportunity to submit its views under the Consultation on the Southern Draft Regional Waste Management Plan.

The points made below have been considered by Ibec's Environment Policy Committee through its Waste and Resource Management Working Group. The Committee's membership consists of over one-hundred voices from all industry sectors, all of whom produce waste and many of whom provide waste services of every technological variety.

All Ibec members rely heavily on the provision of national and regional waste, resource management and infrastructure planning policies that are fair, transparent and which balance economic growth and stability with efficient and cost-effective environmental regulation.

As such, Ibec submits the following for your consideration:

1. In our submission of 21 August 2014 to the Department of The Environment, Community and Local Government on the Draft Strategic Environmental Assessment Scoping Reports for the three waste management regions, a copy of which was provided to your Office, Ibec expressed concern with the lack of sufficient evidentiary support for many of the Reports' key conclusions and called for the relevant supporting data to be accurately set out or properly cited in those Reports.

Similarly, Ibec cautioned that in several instances where support data was offered in the Reports, said data was out of date. In some cases, the Reports cited data as old as 2010 for purposes of planning for 2015 and beyond.

Careful gathering, recording, storage and use of quality and timely data is critical to promoting better government, and through such better government, better policy making and better planning of infrastructure. By contrast, poorly designed policy, legislation, regulation and service delivery add to the cost of doing business and are an obstacle to growth and job creation.

The Southern Draft Regional Waste Management Plan does not on the whole establish a good data framework for waste infrastructure planning. A critical example of this is the Draft Plan's failure at numerous points to clearly distinguish between existing infrastructure and facilities and those facilities and infrastructure projects that are pending or still in development or planning phase.

Ibec believes that where data is transparent and accessible to the public, such distinctions will be easier to make and the policy and planning decisions made in reliance on that data will be better. We therefore recommend that, instead of revising the plans to better communicate data central to its conclusions, a separate on-line and publically open waste data management system be established to complement the Plan. Such an investment in data would not only ensure that data capture is conducted more thoroughly and transparently, but that industry stakeholders are able to view and evaluate such data on an on-going basis, and to submit revisions or corrections as appropriate.

A number of Local Authorities have begun making such investments to the benefit of the populations they serve. The Southern Regional Waste Management Office should do likewise. As such, any data in plans that is erroneous, inaccurate or unsubstantiated would not be inappropriately relied on by planners and policy makers. Instead, a live, up-to-date and state-of-the art database will serve this vital function.

2. In our submission on the Scoping Reports we appealed to the Department to again consider Ibec's long-standing call for a balanced and comprehensive approach in assessing the range of practices and technologies currently and potentially available for the treatment and recovery of waste.

As in the Scoping Reports, the Southern Draft Plan falls short of addressing the full range of existing and developing waste disposal, recovery, recycling and other technologies. Equal consideration is due these technologies, including, but not limited to, waste-to energy through thermal treatment or otherwise, MBT, autoclaving, anaerobic digestion, the full range of recycling technologies and certain uses of SRF. Where such equal consideration is not warranted, the policy and technical justification for same should be clearly set out.

How the Plan addresses the use of SRF as a replacement for fossil fuels in cement kilns is a good example of how it falls short of giving due and fair consideration to available and developing technologies. So-called 'co-processing' increasingly plays an important part in effective waste management in Ireland by moving residual waste up the hierarchy. Co-processing produces no ash, and as such provides a more optimal recovery option for wastes with a higher calorific value than those typically fed into traditional incineration. Cement manufacturers who use SRF have over a relatively short period created another cost-effective recovery option for residual waste.<sup>1</sup> Nevertheless, environmental and resource use gains such as these have yet to be firmly recognized by policy makers and planners.

By not duly considering such technologies, the Draft Plan comes across as unwieldy and out of touch with best practice. The Plan must better accommodate the fast pace at which such technologies develop relative to the pace of planning and policy making, if only by judiciously refraining from drawing premature or insufficiently evidenced conclusions.

Ibec greatly appreciates the Office taking these points into account. Should you have any questions or concerns in relation to the above, please do not hesitate to contact me.

Yours sincerely,



Morgan Baker  
Environment Policy Executive

Cc: Philip Nugent, Principle Officer, Department of the Environment, Community and Local Government Waste and Resource Policy  
(Philip.nugent@environ.ie)

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<sup>1</sup> Cement Manufacturers Ireland (CMI) report in its November 2014 document "Ireland's Cement Industry and Alternative Fuels" that their members have achieved 30% fossil fuel replacement using SRF and other alternative fuels in cement production. In the same report, CMI repeated their public commitment to increase this amount to 50% by 2017.