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SEA Statement

Southern Region

Waste Management Plan 2015 - 2021



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SEA Statement

Southern Region Waste Management Plan 2015 - 2021

Document Control Sheet

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TABLE OF CONTENTS

1	INTRODUCTION	1
2	SUMMARY OF KEY FACTS.....	2
3	SUMMARY OF SEA PROCESS	3
3.1	SCREENING	3
3.2	SCOPING AND STATUTORY CONSULTATION	3
3.3	ENVIRONMENTAL ASSESSMENT AND ENVIRONMENTAL REPORT.....	4
3.4	STATUTORY CONSULTATION ON DRAFT RWMP	4
3.5	APPROPRIATE ASSESSMENT AND NATURA IMPACT REPORT.....	6
3.6	SEA STATEMENT	7
3.7	ADOPTION OF SOUTHERN REGION WASTE PLAN.....	7
4	INFLUENCE OF THE SEA PROCESS ON THE RWMP	8
4.1	INTRODUCTION	8
4.2	SUMMARY OF SEA ASSESSMENT	8
4.2.1	Overall Summary Assessment	9
4.3	INTEGRATION OF SEA PROCESS	10
4.3.1	Recommended Mitigation Measures.....	11
5	HOW CONSULTATION FEEDBACK HAS INFLUENCED THE RWMP	19
5.1	KEY ISSUES RAISED IN THE SUBMISSIONS AND CHANGES MADE TO THE RWMP	19
5.1.1	Targets.....	19
5.1.2	Policy and Legislation (Objective A)	20
5.1.3	Prevention Actions (Objective B)	21
5.1.4	Resource Efficiency and the Circular Economy (Objective C)	22
5.1.5	Coordination Actions (Objective D).....	23
5.1.6	Infrastructure (Objective E).....	24
5.1.7	Enforcement and Regulation (Objective F)	29
5.1.8	Protection Actions (Objective G).....	30
5.1.9	Other Waste Streams Actions (Objective H)	31
5.1.10	SEA and NIR.....	31
6	PREFERRED SCENARIO AND REASON FOR CHOOSING THE FINAL RWMP	35
6.1	ALTERNATIVES CONSIDERED FOR THE SOUTHERN REGION WASTE MANAGEMENT PLAN.....	35
6.2	PREFERRED SCENARIO	36
6.2.1	Strategic Direction.....	36

6.2.2 Strategic Policy Alternatives	40
6.3 OVERALL PREFERRED SCENARIO	44
7 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE ADOPTED RWMP	46
7.1 INTRODUCTION	46
7.2 RESPONSIBILITY FOR MONITORING	46
7.3 SOURCES OF INFORMATION FOR MONITORING	46
8 ADDENDUM TO ENVIRONMENTAL REPORT	51
8.1 INTRODUCTION	51
8.2 AMENDMENTS BY CHAPTER.....	51
8.2.1 Non-technical Summary	51
8.2.2 Chapter 4	51
8.2.3 Chapter 5	53
8.2.4 Chapter 6	54
8.2.5 Chapter 9	54

APPENDICES

Appendix A Screening of Proposed Changes to Southern Region Waste Management Plan

LIST OF TABLES

Table 3-1 Organisations/Individuals Making Written Submissions	4
Table 4-1 Strategic Environmental Objectives.....	9
Table 4-2 Summary Assessment Table	10
Table 4-3 How Environmental Considerations Have Been Taken into Account in the RWMP.....	10
Table 4-4 Mitigation Measures Relating to Assessment of Alternatives.....	12
Table 4-5 Mitigation Measures Relating to Assessment of Policies and Policy Actions (see Chapter 8)	13
Table 7-1 Environmental Monitoring Programme.....	47

1 INTRODUCTION

This SEA Statement has been prepared as part of the Strategic Environmental Assessment (SEA) of the Southern Region Waste Management Plan in accordance with national and EU legislation. This document provides information on the decision-making process and documents how environmental considerations, the views of consultees/stakeholders and the recommendations of the Environmental Report and the assessment carried out under Article 6 of the Habitats Directive have been taken into account by, and influenced, the final adopted plan.

The regional waste management plan (RWMP) and the associated environmental documents have been prepared by the lead authorities for the Southern Region: Limerick City and County Councils/Tipperary County Council. This SEA Statement has been prepared in accordance with Schedule 2, Section 16(2) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004) as amended and having regard to Article 8 (Decision Making) of EU Directive 2001/42/EC on Strategic Environmental Assessment and Circular Letter PL 9/2013, Department of Environment, Community and Local Government.

The structure of the SEA Statement is as follows:

1. Introduction;
2. Summary of key facts;
3. Summary of the SEA process;
4. Influence of the SEA process on the RWMP;
5. How consultation feedback has influenced the RWMP;
6. Preferred scenario and reasons for choosing the final plan;
7. Measures to monitor significant environmental effects of the implementation of the adopted RWMP; and
8. Addendum to Environmental Report.

2 SUMMARY OF KEY FACTS

Title of Plan:	Southern Region Waste Management Plan
Purpose of Plan:	To put in place coherent policy objectives and actions which align with European and national waste policy and support Ireland's move to an economy defined by higher resource efficiency and productivity. The plan is focused on recognising the important role the waste sector has to play in helping Ireland's households, businesses and industry in the transition towards a more resource efficient and circular economy.
Competent Authority:	Limerick City and County Councils/Tipperary County Council on behalf of the local authorities in the Southern Region.
Period covered:	The RWMP addresses waste management over the 6 year period from 2015 to 2021, although it takes account of the longer term horizon also.
Area of Plan:	The RWMP covers the Southern Region which incorporates the administrative areas of Carlow, Cork, Clare, Kerry, Kilkenny, Tipperary and Wexford County Councils, Limerick City and County Council, Waterford City and County Council and Cork City Council.
Nature/Content of Plan:	The plan contains policies and policy actions to support the management of waste as a valuable material resource which can lead to a healthier environment and sustainable commercial opportunities for our economy. The strategic areas as set out in the RWMP are: Policy and Legislation; Prevention; Resource Efficiency and Circular Economy; Coordination; Infrastructure; Enforcement and Regulation; Protection; and Other Waste Streams.
Date RWMP came into effect:	12 May 2015
Main contact:	Regional Waste Coordinator, Southern Region Waste Management Office, Limerick County Council, Lissanalta House, Dooradoyle, County Limerick E-mail: rwmo@limerickcoco.ie

3 SUMMARY OF SEA PROCESS

The Southern Region Waste Management Plan has been subject to a process of Strategic Environmental Assessment (SEA), as required under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011. This has included the key steps described in the following sections.

3.1 SCREENING

Screening was carried out to establish if an SEA was required for the RWMP. This process was undertaken by RPS on behalf of the lead authority for the Southern Region (Limerick City and County Councils/Tipperary County Council on behalf of the local authorities in the Southern Region) in Q2 of 2014. In the context of the S.I. 435 of 2004 (as amended), it was determined that the RWMP would require SEA.

3.2 SCOPING AND STATUTORY CONSULTATION

Scoping was carried out to establish the level of detail appropriate for the Environmental Report. A draft scoping report was prepared in May/June 2014 and this was used as the basis for statutory and non-statutory consultations. Statutory consultation was undertaken with the five statutory consultees for SEA in Ireland as follows:

1. Environmental Protection Agency (EPA);
2. Department of Arts, Heritage and the Gaeltacht (DAHG);
3. Department of Agriculture, Food and the Marine (DAFM);
4. Department of Communications, Energy and Natural Resources (DCENR); and
5. Department of Environment, Community and Local Government (DECLG).

A workshop was held in the Custom House, Dublin on 23 June 2014 and all statutory consultees were invited. Also, transboundary consultation was undertaken with the Northern Ireland Environment Agency (NIEA).

In addition, non-statutory consultation was undertaken. To facilitate this, the Scoping Report was formally put out for consultation for a period of 4 weeks (4 June to 4 July 2015). A notice was placed in the *Irish Times*, the *Irish Examiner* and the *Irish Independent* on 4 June 2014 announcing that scoping was underway for the RWMP and inviting submissions. The draft scoping report was also placed on a dedicated website: <http://southernwasteregion.ie/>.

All submissions received from statutory and non-statutory consultation were considered in preparation of the Environmental Report. All of the environmental topics listed in the SEA Directive were considered and all were scoped in for the purposes of the assessment.

3.3 ENVIRONMENTAL ASSESSMENT AND ENVIRONMENTAL REPORT

The preparation of an Environmental Report on the likely significant effects on the environment of implementation of the RWMP included consideration of:

- Baseline data relating to the current state of the environment;
- Links between the draft RWMP and other relevant strategies, policies, plans, programmes and environmental protection objectives;
- Key environmental problems affecting waste;
- The likely significant effects of the draft RWMP on the environment (both positive and negative);
- Measures envisaged for the prevention, reduction and mitigation of any significant adverse effects;
- An outline of the reasons for selecting the alternatives chosen; and
- Monitoring measures to ensure that any unforeseen environmental effects will be identified, allowing appropriate remedial action to be taken.

3.4 STATUTORY CONSULTATION ON DRAFT RWMP

On 18 November 2014 the draft document *Southern Region Waste Management Plan* was put on display for public consultation alongside the SEA Environmental Report and the Appropriate Assessment (AA) Natura Impact Report. The deadline for receipt of submissions was 30 January 2015. A total of 95 responses were received from a wide range of stakeholders and interested parties including government departments, waste companies, professional bodies, industry bodies/chambers of commerce, community and voluntary/NGO groups, local government and other interested parties. **Table 3-1** identifies the organisations and individuals that made a submission.

Table 3-1 Organisations/Individuals Making Written Submissions

Ref.	Organisation/Individual
1	Cement Manufacture Ireland (CMI)
2	Chartered Institution of Waste Management (CIWM)
3	Community Reuse Network
4	Cre
5	Environmental Pillar
6	IBEC
7	Irish Farmers' Association (IFA)
8	Irish Charity Shops Association
9	Irish Concrete Federation
10	Irish Motor Vehicle Recyclers Association (IMVRA)
11	Irish Waste Management Association (IWMA)
12	Soil Recovery Association
13	AGB Landfill Holdings Ltd
14	Bord na Móna plc

Ref.	Organisation/Individual
15	Clean Ireland Recycling
16	Country Clean Recycling
17	Dublin Waste to Energy (DWtE) Ltd
18	GreenGas AD plant
19	Greenstar
20	Indaver Ireland
21	KWD Recycling
22	Rehab Group
23	Stream BioEnergy
24	Carlow County Council
25	Clare County Council
26	Clare County Council
27	Cork City Council
28	Cork County Council
29	Kerry County Council
30	Kilkenny County Council
31	Limerick City & County Council (EAO)
32	Limerick City & County Council (Waste Enforcement)
33	Local Authority Environmental Awareness Officers (EAOs)
34	Local Authority Prevention Network (LAPN)
35	CHASE (Cork Harbour Alliance for a Safe Environment)
36	CHASE (Monkstown & Glenbrook branch)
37	Cobh Action for Clean Air
38	Cork Environmental Forum
39	Kinsale Environment Watch
40	VOICE
41	An Taisce
42	Department of Communications, Energy and Natural Resources (DCENR)
43	Department of the Environment, Community and Local Government (DECLG)
44	Department of Arts, Heritage and the Gaeltacht
45	Department of the Environment Northern Ireland
46	Environmental Protection Agency (EPA)
47	Cllr David Doran
48	Cllr David Dunne
49	Cllr Johnny Flynn
50	Cllr Tom Woods
51	Cllr Marcia Dalton
52	Clean Technology Centre
53	David Brosnan, Project Consultant (Waste-to-Power)
54	Dr Duncan Laurence, Duncan Laurence Environmental Ltd
55	VESI Environmental Ltd
56	Kerry Airport plc
57	Kerry Ingredients

Ref.	Organisation/Individual
58	Glenribbeen Eco Lodge
59	St John's Girls' National School
60	Technology Centre for Biorefining and Bioenergy (TCBB)
61	Repak
62	WEEE Ireland
63	Green Party
64	Boomerang Recycling
65	Gas Networks Ireland
66	Irish Aviation Authority
67	Irish Water
68–95*	Members of the public

*Names omitted.

A copy of these submissions is available on the website for the Southern Region waste office (<http://southernwasteregion.ie/>). They are also summarised in the *Southern Region Post Draft Consultation Report*. Further details of the key issues raised are presented in Chapter 5 of this SEA Statement.

3.5 APPROPRIATE ASSESSMENT AND NATURA IMPACT REPORT

In addition to the SEA, there is a requirement under the EU Habitats Directive (92/43/EEC) (as transcribed into Irish law) to assess whether the RWMP, individually or in combination with other plans or projects, is likely to have significant effect on a European Site, which includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), in view of the site's conservation objectives. The requirement for an assessment derives from Article 6 of the directive, and in particular Article 6(3) which requires that:

“Any plan or project not directly connected with or necessary to the conservation of a site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”

In recognition of this, an Appropriate Assessment Screening was carried out, in parallel with the SEA process. From this it was determined that AA was required and a Natura Impact Report was prepared to inform an Appropriate Assessment. The Appropriate Assessment of the RWMP has been carried out in the context of the scope and content presented in the RWMP.

Three aspects of the RWMP were considered to hold potential for significant effects on European Sites: potential new waste management infrastructure to deliver on identified capacity needs; existing waste management infrastructure which may be causing an effect; and historic unregulated landfills requiring remediation.

The Appropriate Assessment took a precautionary approach and assessed the general impacts that would be anticipated from the RWMP providing the necessary inclusion of mitigation measures and guiding principles at the strategic level of the plan. As a precautionary approach, the draft RWMP included environmental protection criteria which require avoidance of European Sites in the first

instance and reiterated the legislative requirement for AA screening and full AA where potential for effects exists. Following stakeholder feedback and to strengthen this precautionary approach, the criteria included in the plan have been expanded to include all waste-related activities requiring development consent, including the expansion of existing facilities, and statutory reviews of existing authorisations where an AA has not yet been carried out.

The AA has been completed on the final RWMP and it has been concluded in the Natura Impact Report (NIR) that the Southern Region Waste Management Plan 2015–2051 is compliant with the requirements of Article 6 of the EU Habitats Directive.

3.6 SEA STATEMENT

In accordance with Article 16 of S.I. 435 of 2004 as amended, the Competent Authority is required to prepare a statement summarising:

- a) How environmental considerations have been integrated into the plan or programmes, or modification to a plan or programme;*
- b) How (i) the environmental report, prepared pursuant to article 12, (ii) submissions and observations made to the planning authority in response to a notice under article 13 and (iii) any consultations under article 14 have been taken into account during the preparation of the plan or programme;*
- c) The reasons for choosing the plan or programme, in light of other reasonable alternatives dealt with, and*
- d) The measures decided upon to monitor, in accordance with article 17, the significant environmental effects of implementation of the plan or programme.*

The main purpose of this SEA Statement is to provide information on the decision-making process for the RWMP in order to illustrate how decisions were taken, making the process more transparent. In so doing, the SEA Statement records how the recommendations of both the Environmental Report and the Natura Impact Report, as well as the views of the statutory consultees and other submissions received during consultation, have influenced the preparation of the final plan. The SEA Statement also provides information on the arrangements put in place for monitoring and mitigation. The SEA Statement will be available to the public, along with the Natura Impact Report and the adopted Southern RWMP.

3.7 ADOPTION OF SOUTHERN REGION WASTE PLAN

The RWMP was made by the local authorities for the Southern Region on 12 May 2015.

4 INFLUENCE OF THE SEA PROCESS ON THE RWMP

4.1 INTRODUCTION

The SEA and the AA processes have been undertaken in parallel to the preparation of the draft waste plan. Thus, from the outset, considerations of the environmental consequences of the alternatives have been taken into account. The iterative process ensured that the SEA/AA and the preparation of the RWMP were integrated in order to meet the environmental objectives and the objectives of the plan.

A considerable effort has been made through the Plan, SEA and AA processes to integrate environmental considerations into the development of the RWMP. This commenced with the preparation of the strategic vision for the RWMP which incorporates the principles of self-sufficiency, polluter pays, source segregation, sustainable development and environmental protection. In addition the strategic objectives of the RWMP focus on implementation of eight policy areas:

- Policy and legislation;
- Prevention;
- Resource efficiency and circular economy;
- Coordination;
- Infrastructure;
- Enforcement and regulation;
- Protection; and
- Other waste streams.

The findings of the SEA and AA have been directly integrated into the RWMP through recommended mitigation measures for specific policy actions and, notably, the inclusion of environmental protection criteria focused on protecting the environment and human health from new and existing waste activities.

4.2 SUMMARY OF SEA ASSESSMENT

The approach used for the assessment in the SEA is termed an “objectives led assessment”. In this case, each of the draft RWMP policies and policy actions was tested against defined SEA Strategic Environmental Objectives (see

Table 4-1) which covered all SEA environmental topics under the relevant SEA legislation, e.g. population, biodiversity, material assets. A matrix format was used for the assessment, which permitted a systematic approach and comparison of alternatives.

Table 4-1 Strategic Environmental Objectives

Obj. 1 Biodiversity Flora and Fauna: Preserve, protect, maintain and, where appropriate, restore the terrestrial, aquatic and soil biodiversity, particularly EU and nationally designated sites and protected species.
Obj. 2 Biodiversity Flora and Fauna: Integrate biodiversity considerations into the Southern Region Waste Management Plan.
Obj. 3 Population and Human Health: Protect human health from the impacts of waste management by ensuring waste prevention and related activities are promoted at community and individual level.
Obj. 4 Population and Human Health: Promote and encourage access and services for appropriate waste management for all.
Obj. 5 Soils: Safeguard soil quality and quantity from waste and reduce soil contamination.
Obj. 6 Water: Protect water quality and the water resource from waste activities.
Obj. 7 Air Quality: Minimise emissions of pollutants to air associated with waste management.
Obj. 8 Climatic Factors: Minimise contribution to climate change by reducing emissions of greenhouse gasses associated with the prevention and management of wastes and adapt to the potential effects of climate change through appropriate siting of waste infrastructure.
Obj. 9 Material Assets: Support sustainable waste management activities without conflicting with environmental protection objectives.
Obj. 10 Material Assets: Minimise transport impacts of waste management activities.
Obj. 11 Cultural Heritage: Protect places, features, buildings and landscapes of cultural, archaeological or architectural heritage from impact as a result of waste activities.
Obj. 12 Landscape: Protect and maintain the national landscape character.
Obj. 13 Social: Promote sustainable management of waste at an individual, community, regional and national level.

4.2.1 Overall Summary Assessment

At the broad level, implementation of the RWMP is expected to bring environmental improvements, since it tackles specific pressures arising from waste management activities. The focus of the strategy is on prevention in terms of waste generation in the first instance and then on reuse, recycling and recovery as a means to reducing the amount of material going to waste and requiring collection, treatment and/or disposal. The plan has potential for significant cumulative positive impacts on all environmental receptors through reduced need for collection (therefore reduced transport-related emissions to air and water) and reduced treatment/disposal (therefore reduced process-related emissions to air, soils and water). However, there are some cases where negative impacts may arise in the wider environment. The SEA identified such areas where mitigation of impacts can be achieved, including ensuring that monitoring and regulation are adequate, and encouraging a coordinated approach to waste management in the State. The assessment of policies and related policy actions which are set out in the plan are summarised in **Table 4-2**.

Table 4-2 Summary Assessment Table

	Overall Impact	Mitigation Measures Recommended
A. Policy and Legislation	+	✓
B. Prevention	+	✓
C. Resource Efficiency and Circular Economy	+/-	✓
D. Coordination	+	X
E. Infrastructure	+/-	✓
F. Enforcement and Regulation	+	✓
G. Protection	+/-	✓
H. Other Waste Streams	+/-	✓

4.3 INTEGRATION OF SEA PROCESS

The SEA and AA processes were ongoing throughout the development of the draft RWMP, with the corresponding project teams working together to identify potential environmental issues/constraints at the earliest possible stage in the plan-making process. The SEA and AA teams were involved in the:

- Development of the alternatives;
- Evolution of policy actions; and
- Recommendation of mitigation measures to address the potential impacts arising from the alternatives considered.

The SEA and AA processes have ensured that potential environmental impacts (both positive and negative) associated with the draft RWMP have been given due consideration in the preparation of the RWMP. **Table 4-3** shows how environmental considerations and the input of the SEA and AA have been taken into account in the final RWMP.

Table 4-3 How Environmental Considerations Have Been Taken into Account in the RWMP

Environmental Consideration	How Has This Been Accounted for in the RWMP?
Identification of environmental constraints	The SEA team undertook an audit of baseline environmental conditions for the waste region with reference to population, human health, climate, air landscape, cultural heritage, biodiversity, flora and fauna, material assets and water. This information was used to focus the SEA objectives, develop alternatives and assess positive and negative impacts associated with the implementation of the proposed RWMP.

Environmental Consideration	How Has This Been Accounted for in the RWMP?
Assessment of alternatives	The environmental baseline and objectives were used to identify key sensitivities and inform development of the alternatives and ultimately the assessment of the preferred alternative. The SEA team and the plan team liaised on possible alternatives during preparation of the SEA scoping document and subsequently as the RWMP evolved through meetings and workshops.
Recommendation of mitigation measures to address impacts on the wider environment	Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. These included amendments to the wording of policies and policy actions in the RWMP and inclusion of new actions to reflect protection of the environment and human health. A key aspect of this was the development of environmental protection criteria for inclusion in the RWMP to guide future consents.
Required Environmental Monitoring Programme	A monitoring programme was presented in this SEA Environmental Report and has been integrated into the RWMP. This programme will facilitate the ongoing monitoring of the implementation of the RWMP.
Consultation	<p>Statutory consultation was undertaken with the environmental consultees for SEA in Ireland in relation to scoping of the Environmental Report. Issues raised were used to inform the overall scope and context of the environmental assessment. Public consultation was undertaken at the scoping stage and this stakeholder feedback also helped to shape the environmental assessment.</p> <p>Subsequently, the SEA Environmental Report, the Natura Impact Report (from the Appropriate Assessment Process) and the draft RWMP were put on public display. Submissions received have been reviewed by the SEA and plan teams and amendments have been made where appropriate. All changes to policies and actions have been screened by the SEA and AA teams to determine if they would result in significant effects (see Appendix A).</p>

4.3.1 Recommended Mitigation Measures

The assessment of the alternatives and the preferred strategy for the RWMP resulted in the recommendation of 36 mitigation measures (**Table 4-4** and **Table 4-5**). The first six of these related to strategic alternatives for the RWMP. The remaining 30 related to specific policies and actions arising from the preferred scenario. It is notable that the mitigation proposed by the SEA process was, in the main, integrated into the RWMP to improve its overall environmental benefits.

Table 4-4 Mitigation Measures Relating to Assessment of Alternatives

Alternatives	Mitigation Measure Proposed in SEA Environmental Report	Included in the Plan
Section 7.2 Self-sufficiency	To address the possibility that wastes would continue to be exported despite capacity coming on-stream in Ireland, a strong commitment to self-sufficiency and the proximity principle would need to be factored into the strategic approach.	Policy A.4 deals with the issue of self-sufficiency. Wording has been added to the policy since the draft plan to strengthen the position. In addition, the DECLG is looking at policy and / or economic options to reduce the exporting of residual wastes. The full wording of Policy A.4 is: <i>Aim to improve regional and national self-sufficiency of waste management infrastructure for the reprocessing and recovery of particular waste streams such as mixed municipal waste, in accordance with the proximity principle. The future application of any national economic or policy instrument to achieve this policy shall be supported.</i>
Section 7.5.3 Resource efficiency & circular Economy	A Code of Practice shall be prepared for the <i>Preparation for Reuse</i> sector and this will be rolled out alongside an education and awareness campaign at the local level to assist operators in delivering a positive sustainable service overall. Registration of activities should also be considered.	Policy Action C.1.1 in the final RWMP includes a commitment to preparing a guidance note .
Section 7.5.5 Infrastructure (Collection)	An awareness campaign to support the rollout of brown bins is required. Ongoing review of the feasibility for indigenous paper, glass and metal recycling capacity is required as part of the overall strategy for self-sufficiency to determine if volumes of waste could reasonably support smaller regional facilities rather than sending them for export.	Policy Actions B.2.1, B.2.3, B.4.3 all address the issue of awareness and prevention campaigns. Although not specifically referring to rollout of brown bins, the wording in these policy actions encompasses a range of possible issues such as the brown bin collection service. In addition Policy Action F.1.4 commits to allocate resources to monitor the schedule for the roll-out of brown bins to households.
Section 7.5.5 Infrastructure (Backfilling)	Future authorisations for backfilling should ensure proper siting of facilities in line with appropriate siting guidance.	Environmental protection criteria for the siting of waste facilities have been strengthened and are included in Section 16.5 of the final RWMP.
Section 7.5.10 Protection	To mitigate the potential spread of IAS, a qualified ecologist should undertake survey for IAS before waste is disturbed. A management plan to ensure IAS are not spread from the site will	Commitments in relation to IAS have been made in Section 16.5, and also in Policy Action G.2.4.

Alternatives	Mitigation Measure Proposed in SEA Environmental Report	Included in the Plan
	be developed if such species are identified. To mitigate the potential to impact on the Natura 2000 network, AA screening shall be carried out before remediation is undertaken.	
Section 7.5.11 Other Waste Streams	Any proposed facilities for the treatment of sludges should adhere to appropriate siting guidance.	Environmental protection criteria are included in Section 16.5 of the final RWMP. Their focus is on the protection of the environment and human health and they apply to all waste-related activities requiring consent.

Table 4-5 Mitigation Measures Relating to Assessment of Policies and Policy Actions (see Chapter 8)

Reference	Proposed Mitigation Measure	Included in the RWMP
A.1 A.1.1	Negative impacts associated with Policy A.1 and Policy Action A.1.1 relate to possible impacts associated with siting of infrastructure. While it is acknowledged that the draft plan includes siting criteria (now called environmental protection criteria) to reduce the negative effects of implementation of the RWMP, it is recommended that consideration be given to developing <i>Siting Guidelines</i> in due course to guide development of infrastructure in a sustainable manner which protects the environment and human health.	This mitigation was included in the RWMP under A.1 policy. In addition, a specific policy, G.3.1: <i>Prepare siting guidelines for waste facilities and review environmental protection criteria as set down in the waste plan</i> , was developed to commit to developing the guidelines.
A.2	Any review of fees and charges should take into account how they might indirectly encourage unsustainable waste management activities.	This mitigation was included in the RWMP under A.2 policy.
A.3.1	The use of Key Performance Indicators should be considered in the annual reporting.	This mitigation was included in the RWMP under A.3.1 policy.
A.4	Include the following text in Policy A.4: ... <i>and having regard to the protection of human health and the environment, particularly the Natura 2000 network</i> . While it is acknowledged that the draft plan includes siting criteria to reduce the negative effects of implementation of the RWMP, it is recommended that consideration be given to	This text change was not included in the RWMP under A.4 policy. However, it is noted that in relation to siting of infrastructure, a specific policy has been included in the RWMP at G.3.1: <i>Prepare siting guidelines for waste facilities and review environmental protection criteria as set down in the waste plan</i> .

Reference	Proposed Mitigation Measure	Included in the RWMP
	developing <i>Siting Guidelines</i> in due course to guide development of infrastructure in a sustainable manner which protects the environment and human health.	
B.2.2	Policy Action B.2.2 would benefit from the addition of environmental legislation relating to the EU Habitats and Birds Directives and transposing Irish legislation to ensure all Local Authorities within the region are aware of the obligations to carry out AA.	This text change was not included in the RWMP under B.2.2 policy, which was focused on waste prevention specifically. Further consideration has been given to the mitigation by the plan/SEA team and it was considered that awareness of obligations under the EU Habitats and Birds Directives is dealt with in several sections of the RWMP, e.g. Chapters 1, 3, 16 and 19.
B.4.3	Policy B.4.3 would benefit from messaging around the impact of waste on society and ecosystem services to raise awareness across the region of why waste prevention and proper management are vital to environment and human health.	This mitigation was included in the RWMP under B.4.3 policy.
C.1 C.1.1	Negative impacts associated with Policy C.1 and Policy Action C.1.1 relate to potential impacts associated with reuse and preparing for reuse activities operating outside of any permitting regime. A Code of Practice should therefore be prepared for the Reuse and <i>Preparation for Reuse</i> sector and this should be rolled out alongside an education and awareness campaign at the local level to assist operators in delivering a positive sustainable service overall. Registration of activities should also be considered.	It was considered that a code of practice may not be the most appropriate tool to communicate with this sector and as an alternative a commitment to develop a guidance note was included with Policy Action C.1.1 in the RWMP instead.
C.2.2	The Code of Practice referenced in C.2.2 should include reference to site management for the protection of human health and the environment with particular focus on pathways to groundwater and surface water from storage of segregated materials.	This mitigation was included in the RWMP under C.2.2 policy.
C.3	Negative impacts associated with Policy C.3 relate to potential impacts associated with enterprises operating outside a permitting regime. To offset these impacts it is recommended that a code of practice be generated to guide development of	Reference to a code of practice was not specifically added to this policy but it is noted that Policy Action C.1.1 includes reference to preparation of a guidance note.

Reference	Proposed Mitigation Measure	Included in the RWMP
	enterprises in a sustainable manner which protects the environment and human health.	
E.1 E.2	Future authorisations for pre-treatment activities should include an assessment of potential impacts on the environment. An AA screening should be completed for all future authorisations. It is noted that in Section 16.4 of the draft plan that there is a commitment that the local authorities in the region will ensure that any project and any associated works, individually or in combination with other plans or projects, are subject to Appropriate Assessment Screening.	Text has been included at the start of Section 16.4 outlining the commitment to undertake AA screening and where necessary full assessment for any waste projects and associated works. This is further strengthened in Section 16.5 which sets out environmental protection criteria which must be complied with when siting and authorising new facilities.
E.3 E.4 E.6	New CA facilities must include site drainage to capture all run-off in line with siting criteria in the draft Plan.	A requirement to ensure Sustainable Urban Drainage systems (SUDs) is applied in order to meet the requirements of the Water Framework Directive and associated RBMP is included in Section 16.5 Environmental Protection Criteria.
E.8	The text of Policy Recommendation E8 should specifically reference protection of the environment and public health however it is accepted that there is reference to the siting guidance and criteria in the draft plan which address the issue to a certain extent.	Text references the environmental criteria (Section 16.5) which are based on protection of the environment and human health.
E.11	It is recommended that prior to E.11 being implemented a feasibility study is undertaken of the permanently or temporarily closed landfills in the region to determine what activities may or may not be appropriate for consideration at each site based on site and surrounding sensitivities. It is acknowledged that the Policy Recommendation specifically refers to consideration of the Natura 2000 network and this is considered positive. The feasibility study should also consider environmental sensitivities under the wider environmental scope of SEA.	To address this, Policy E.11 includes the following wording: <i>“Any development proposals shall be subject to appropriate assessment screening in accordance with the requirements of the EU Habitats Directive to ensure protection and preservation of the Natura 2000 network.”</i> Text has also been included in Section 16.4.3 of the RWMP recommending that a feasibility study be undertaken.
E.12	The lead authority should liaise with the relevant authorities in Northern Ireland to ensure there is a management plan in place to prevent the spread of IAS associated with repatriation of waste. It is further noted that in Section 16.4 of the draft plan there is a commitment that the local authorities in the region will ensure that any project and any associated works, individually or	Text has been included in Section 16.4.3 of the RWMP recommending that the NTFSO liaise with the relevant authorities in Northern Ireland.

Reference	Proposed Mitigation Measure	Included in the RWMP
	in combination with other plans or projects, are subject to Appropriate Assessment Screening. This would apply to such repatriation projects.	
E.14	The Lead Authority shall liaise with relevant stakeholders (including the EPA and NPWS) to ensure that appropriate measures are in place for control of the spread of IAS at backfilling sites.	Text has been included in Section 16.4.4 of the RWMP recommending this coordination and liaison.
E.15 E.16	The spatial imbalance in thermal recovery capacity should be considered as part of any future authorisations. Any new facility must comply with the siting criteria in the draft plan.	The wording of Policy E15a addresses the national versus local need for thermal recovery capacity. This confirms that additional capacity identified in the RWMP is a national need and not specific to any region.
E.17 E.18	Siting criteria will be applied to offset any negative effects in relation to siting of potential facilities. Quality control of the end product is required.	Environmental protection criteria are included in Section 16.5 of the final RWMP.
E.19	It is recognised that based on economies of scale, market forces and end market locations, national facilities for processing all recyclable materials may not be feasible and will need to be assessed on a case by case situation against environmental, economic and technical merits.	Environmental protection criteria are included in Section 16.5 of the final RWMP.
E.20	As a minimum, registration of reuse and preparing for reuse activities and a code of practice are required to ensure that these activities are given the tools necessary to continue operation in a safe and sustainable manner. Continued promotion of reuse at industry and household level.	Reference to registration and a code of practice was not specifically added to this policy but it is noted that Policy Action C.1.1 includes reference to the preparation of a guidance note for the reuse and preparing for reuse activities.
E.21	The standardised approach required under E.21 should facilitate ongoing inter-regional engagement to ensure maximum oversight of authorised and operational capacity on a regional and national level.	The text supporting Policy E.21 acknowledges that a coordinated and considered approach to the future planning of treatment capacities in the region though better communication is required.
E.22–E.25	Siting of any new facilities should have regard to the siting criteria contained in the RWMP. Consideration should also be given to extending the scope of waste streams included in the PRIs to include catering and food	Environmental protection criteria are included in Section 16.5 of the final RWMP. Policy H.2 is considered broad enough to address the issue of food wastes. It is also noted that any such PRI would need to be

Reference	Proposed Mitigation Measure	Included in the RWMP
	waste.	at a national rather than regional level.
F.1	Results on monitoring should be documented annually. The use of Key Performance Indicators should be considered in reporting the monitoring results	This text change was not included in the RWMP under F.1 policy; however, it is addressed under Policy F.2.1.
F.2	Results on monitoring should be documented annually in the RMCEI plan and the use of KPIs should be considered in reporting of the monitoring results. The RMCEI should contain specific criteria to address the management of waste which in turn should inform the inspections.	This mitigation was included in the RWMP under Policy Action F.2.1.
F.3	The proposed Action Plan to address waste arising from criminal activity should be prepared in consultation with various stakeholders including the NPWS, GSI, Gardaí, etc. Responsibilities for implementing the Action Plan and monitoring requirements to assess its implementation will be critical to its success.	This mitigation was included in the RWMP under Policy Action F.3.3.
F.4	Standard mandatory conditions and local discretionary conditions should consider inclusion of screening in relation to both EIA and AA processes.	This mitigation was included in the RWMP under Policy Action F.4.2.
G.1	Potential negative impacts associated with Policy G.1 will be offset through the implementation of siting guidance to be generated to guide development of infrastructure in a sustainable manner which protects the environment and human health.	Environmental protection criteria to inform siting of waste infrastructure are included in Section 16.5 of the RWMP.
G.2	AA Screening should be undertaken for all Tier 1, 2 and 3 Risk Assessments. The Lead Authority shall liaise with relevant stakeholders (including the EPA and NPWS) to ensure that appropriate measures are in place for control of the spread of IAS in relation to remediating historic closed landfills.	This mitigation was included in the RWMP under Policy Action G.2.4.
G.3.1	The application of siting criteria will offset the potential shorter term temporary construction impacts associated with infrastructure. It is recommended that consideration be given to developing <i>Siting Guidelines</i> in due course to guide development of infrastructure in a sustainable manner which protects the	This mitigation was included in the RWMP under Policy Action G.3.1.

Reference	Proposed Mitigation Measure	Included in the RWMP
	environment and human health.	
G.4	Recommendation that policy G.4 be reworded to refer specifically to household unmanaged waste.	This mitigation was not included in the RWMP under G.4 policy. Further consideration was given to this mitigation by the plan and SEA teams and it was concluded that this policy needs to remain broad as unmanaged waste may come from non-household sources, i.e. businesses, as well, and it takes this on board.
H.2.1 H.2.2	Guidelines will be developed by the Regional Prevention Officer and applied to all such schemes to ensure protection of human health and the environment. In addition, waste prevention should act as the overarching aim of any Pilot Scheme introduced.	This mitigation was included in the RWMP under Policy Action H.2.2.

5 HOW CONSULTATION FEEDBACK HAS INFLUENCED THE RWMP

The key issues raised in the submissions received from stakeholders are summarised in this section by key strategic policy area as outlined in the RWMP. Following a comprehensive review and consideration of all the submissions, the local authorities have responded with changes to the final RWMP – wording changes and additions are marked in **bold**.

For individual responses to specific issues that were raised in the submissions on the Southern Region Waste Management Plan, the reader is directed to the post draft plan Consultation Report on the Southern Region's website.

Significant changes made, after the publication of the draft plan, to strategic objectives, policies and policy actions of the plan and SEA and AA screening are recorded in **Appendix A**.

5.1 KEY ISSUES RAISED IN THE SUBMISSIONS AND CHANGES MADE TO THE RWMP

5.1.1 Targets

Issue Raised: Targets
<p>Comments on Target 1</p> <p>The 1% reduction target is too low. Implementation of the pay-by-use regulations should reduce household waste and implement appropriate prevention measures in addressing the 60% of household waste which is avoidable. Various amended targets were suggested.</p> <p>A net reduction in the volume of household waste generated may not be realised, depending on demographics, due to recent low economic activity.</p> <p>The 1% reduction should be measured on “household waste managed” rather than “household waste generated”.</p> <p>Comments on Target 2</p> <p>Need to clarify if target is based on percentage of municipal waste managed (vs generated).</p> <p>“Preparing for reuse” is only measured for specific waste streams such as WEEE. Reporting on “preparing for reuse” of municipal waste could be difficult as most is exported for recycling;</p> <p>There should be separate targets for reuse and recycling, thereby encouraging reuse.</p> <p>Comments on Target 3</p> <p>Recommended providing a definition or description of the term “unprocessed” in the RWMP.</p>
Influence on the Final RWMP
<p>Proposed Changes to Target 1</p> <p>The local authorities reviewed the comments received but no amendments were made to the wording of the target.</p> <p>Proposed Changes to Target 2</p> <p>Following consideration of the submissions made on the wording of the target the local authorities have amended the target as follows:</p> <ul style="list-style-type: none"> Revised wording: “Achieve a recycling rate of 50% of managed municipal waste by 2020”.

Proposed Changes to Target 3

Following consideration the local authorities have added a footnote to the plan target to explain the term “unprocessed” which appears in the target wording.

5.1.2 Policy and Legislation (Objective A)**Issue Raised: Policy and Legislation (Objective A)****Comments on Policy A1 and corresponding actions:**

Should consider ECJ Judgment (C-323/13) on requirement to treat waste prior to landfilling.

Waste collection permit conditions, including for storage, should push waste towards reuse.

Need clarity on how collection permits will apply requirement for 0% direct disposal of unprocessed residual municipal waste to landfill from 2016.

Comments on Policy A.2 and corresponding actions:

Suggestion that waste companies focused 100% on recycling should be exempt from the landfill levy for the disposal of illegally dumped waste, as for road sweepings, litter and fly tipping.

Reduce the landfill levy on waste that has been through a recycling process.

Comments on Policy A.3 and corresponding actions:

Comments in relation to preparation of the annual report including improved data collection and key performance indicators (KPIs); for example “the reuse and recycling figures should be reported separately in order to ascertain if there is true movement up the waste hierarchy”.

Comments on Policy A.4 and corresponding actions:

Suggestion that the “aim to improve” should be strengthened by identification of a timeline by which the exportation of mixed municipal waste (EWC 20 03 01) be ceased.

Recommended that bodies with responsibility for this policy continue to support ongoing research projects that seek to improve and expand reuse.

Recommended a register of reuse organisations under Policy Action A.4.1.

Treatment of waste streams should be properly categorised, i.e. reused, recycled, used for thermal treatment, landfilled, and the overarching term “recovery” discarded.

Influence on the Final RWMP**Changes to Policy Action A.1.1**

- The following definition of unprocessed waste has been included in the list of terms of the waste plan: ***“Unprocessed residual municipal waste means residual municipal waste collected at kerbside or deposited at landfills/CA sites/transfer stations that has not undergone appropriate treatment through physical, biological, chemical or thermal processes, including sorting.”***

Changes to Policy Action A.3.1

- The target for policy action A.3.1 has been amended as follows: **“Prepare annual report and disseminate findings.”**

Changes to Policy Action A.4.1

- The target for policy action A.4.1 has been amended as follows: **“Establish, maintain and publish database.”**

5.1.3 Prevention Actions (Objective B)

Issue Raised: Prevention Actions (Objective B)

Comments on Policy B.1 and corresponding actions:

Requested that the role of the local authority staff “be more clearly defined”.

Comments on Policy Action B.1.3 and corresponding actions

Provision of a minimum of €0.15/inhabitant for local prevention projects was considered too modest;

Funding should be “*subject to systematic and ongoing review*” and be in addition to other funding;

The budget for waste prevention should be explicitly mentioned in the executive summary; and

The income and expenditure table in the executive summary, and the associated text, should indicate where the prevention budget lies.

Comments on Policy B.2 and corresponding actions

Policy Action B.2.4 baseline year should be 2015 and an indicator should be linked to number of employees.

Comments on Policy B.3 and corresponding actions

Should be key to strengthening the Community Reuse Network (CRNI).

Comments on Policy B.4 and corresponding actions

There should be an initiative on hazardous paints;

Industry should be encouraged to design with reuse and recycling in mind using targeted measures such as taxes or PRI schemes;

Policy actions B.4.2 and B.4.3 need clarity between “responsibility” and roles of “key stakeholders”.

Other key comments considered:

- (i) It was noted that the RWMP should reflect the withdrawal of the European Circular Economy package and any replacement targets;
- (ii) It was also suggested that an action on food waste, in particular prevention and home composting, be included.

Influence on the Final RWMP

Changes to Policy B.1:

- Policy Action B.1.1 reworded: “Appoint, where the role does not exist, or retain the role of the local authority Environmental Awareness Officers (EAO) on a whole time equivalent basis to work on activities **including the** implementation of the RWMP on a local and regional basis.”
- Policy Action B.1.2 (B.1.3 of the draft plan) reworded: “Ensure an on-going financial allocation is made in the local authority annual budgets to cover expenditure on waste prevention related activities over and above staff costs **and any grant aid.**”
- Policy Action B.1.2 (B.1.3 of the draft plan): “A minimum of €0.15c/inhabitant to be spent on local prevention projects – **to be reviewed annually.**”

Changes to Policy B.2:

- Policy Action B.2.4 target: “*Reduce the quantity of waste generated at local authority head office by 10% over the baseline **year (2015)** during the plan period.*”
- The indicator for Policy Action B.2.4 now states: “% reduction over the baseline year

and/or % reduction per employee”.

Changes to Policy B.3:

- Policy Action B.3.2 target added “Engage with the EPA at least 3 times per annum on prevention issues.”

Changes to Policy B.4:

- Policy Action B.4.2: *Producer responsibility operators (PROs)* added under “responsibility”.

Changes resulting from other comments:

- Text and references to the EU Circular Economy package have been updated following the withdrawal of the package and the replacement roadmap which is being put in place; Section 4.1 of the plan updated substantially to reflect the latest situation.
- Details of home composting and the master composter programme have been included in Chapter 8.1.2 of the plan.

5.1.4 Resource Efficiency and the Circular Economy (Objective C)

Issue Raised: Resource Efficiency and the Circular Economy (Objective C)

Comments on Policy C.1 and corresponding actions: Need to set reuse and repair targets for compliance schemes and specific waste streams. The RWMP should support their achievement in both private and public sectors. CAS employees need training on reuse.

Comments on Policy Action C.2.1 and corresponding actions: Need to adopt kerbside sorted system of collecting recyclable materials to guarantee a higher quality of feedstock. If this is not possible, adopt a 2-stream commingled system of dry recyclate. There is a need to develop closed loop policies for all materials streams, with labour intensive recycling as a priority.

Considered that this policy action better fits national regulation than local bye-laws; there is a need to enforce existing regulations rather than introduce new bye-laws and to have a standard bye-laws format across the region.

Need to bring forward expected timeline of Q4 2018.

Need to standardise acceptable green bin and brown bin wastes through a national coordinated education programme.

Comments on Policy C.2.2 and corresponding actions: This policy action could interfere with the normal operation of the waste market and unnecessarily impact on the competitiveness of facilities. *“Encouragement of waste industry behaviour must be based on national instruments (e.g. landfill levy/TFS regulations) rather than individual facility authorisations.”*

Comments on Policy C.3 and corresponding actions: Recommended that a working group be established to implement this policy.

Need to develop a national approach and to provide an industry reuse expert through the Local Enterprise Office (LEO) mentoring system.

Comments on Policy C.4 and corresponding actions: Need to support social enterprises in bidding for public contracts, as a sizeable proportion of the reuse sector. Inclusion of a social clause in public procurement criteria as well as a resource efficiency clause.

Other key comments considered:

The needs to encourage development of the reuse/repair area; to retain the circular economy model as a guiding principle; and to “take into account the zero waste” concept were highlighted in various submissions (Policy Action C.1);

The need to include a policy action to support to SMEs was noted, as was the need to work with

CAS in relation to reuse projects (Policy Action C.5.1).

Influence on the Final RWMP

Changes to Policy Action C.1

- Policy Action C.1.2 reworded as follows:

Policy Action: “Review and amend (where appropriate) existing and/or condition the award of new local authority CA site contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations”;

Target – ***“Reuse/preparing for reuse of up to 10% of non-residual waste at local authority CA sites.”***

Indicator: ***“Tonnage reused/prepared for reuse per local authority CA.”***

Section 17.2.1 of the RWMP also amended to include: ***“Identify, coordinate and facilitate the training needs of the region to ensure effective implementation of the plan.”***

Changes to Policy Action C.2

- Policy action C.2.1 amended: Policy Action: ***“Review/introduce presentation of waste bye-laws, across the region, to maximise the quantity and quality of recyclable waste collected and amend/replace/introduce new if appropriate.”***

Target – ***“Review existing bye-laws.”***

Indicator: ***“Number of bye-laws reviewed/introduced.”***

- Policy Action C.2.2 amended: ***“To produce the code of practice in consultation with the EPA.”***

Changes to Policy Action C.4

- Policy action C.4.2 reworded: ***“Implement a systematic engagement with local/regional local authority procurement officers and the Office of Government Procurement (OGP) to ensure the inclusion of resource efficiency criteria in contracts”;***

Target: ***“To meet with local /regional procurement officers and relevant staff of the OGP.”***

Expected timeline: ***“Annually from Jan 2016 onwards.”***

Changes resulting from other comments:

- Chapter 4 now reflects the withdrawal of EU Circular Economy package;
- New Policy C.5 added: ***“Work with and through business support agencies and the National Waste Prevention Programme to encourage businesses and industry to implement resource efficiency principles including the use of clean technologies and preventing waste at source”;***
- New Policy Action C.5.1 added: ***“Encourage SMEs (including micro-enterprises) and industry to realise the environmental and economic benefits of resource efficiency”;***
- New policy actions F.1.4 and F.2.4 added.

5.1.5 Coordination Actions (Objective D)

Issue Raised: Coordination Actions (Objective D)

Comments on Policy D.2 and corresponding actions: It was suggested that there should be a commitment included to review and increase staff over time along with the allocation of a

prevention/resource efficiency officer in each local authority;

Comments on Policy D.3 and corresponding actions: The need to support ongoing reuse research projects was raised in 2 submissions; the need to support businesses in developing eco-design products along with the establishment of regional and/or national symbiosis programmes was also highlighted;

Comments on Policy D.4 and corresponding actions: It was recommended that CRNI, as the national representative body for reuse, be included in this policy.

Other key comments considered:

It was suggested that a national waste plan coordinating committee should be established. It was also noted that on-going engagement with relevant stakeholders was required and the RWMP needed to include a policy on accessing environmental information in a consistent manner nationally.

Influence on the Final RWMP

Changes to Policy Action D.2.1:

- *“Establish and/or maintain funded regional waste management office and the requisite structures (including administrative, technical & communication) to implement national and regional policy”;*

Changes to Target for Policy Action D.2.2:

- *“Ensure roles are in place **or maintained**”;*

Changes to Policy Action D.3.1 reworded:

- Indicator: *“Number of partnerships and networks established, research **& pilot** projects undertaken”;*
- Responsibility: *“**Lead Authority**, local authorities, EPA, DECLG & all relevant network partners **and stakeholders**”.*

Changes resulting from other comments:

See amendments made to Policy Action A.3.1 noted above.

5.1.6 Infrastructure (Objective E)

Issue Raised: Infrastructure (Objective E)

Facility authorisations by local authorities policies:

- It was noted that “over-authorisation” is “dangerous” and under-utilised or not developed authorisation is less of an issue than under-provision of infrastructure due to a lack of authorisations; and
- It was noted that the proposal to align authorised and operational capacities has the potential to be a complex process as the assessment of operational capacity requires the consideration of a range of factors.

Authorised capacity analysis:

- Need certainty when making planning applications for waste facilities;
- Need to allow facilities to develop in a market-led manner;
- Difficulties relating to quantum/restrictions/capacity caps/ planning.

Data in relation to authorised capacity:

- Submissions queried the content used in the data analysis, requesting, variously: more recent, additional or reduced data and that an open online waste data database be created.

Waste infrastructure:

- Need to clarify terminology of “waste-to-energy” and “thermal treatment”;
- Application of centrality and proximity principle to deliver carbon and local benefits;
- Need to cater for seasonal producers such as tourism and holiday homes;
- PTUs must be considered;
- All-island hazardous waste capacity provision is required;
- Garden organics collections should be provided for;
- Disappointment that the draft RWMP was non-specific with siting guidelines to ensure waste facilities are sited in appropriate areas;
- Additional bring banks/recycling centres and expansion of the materials accepted at them, including green waste with compost distribution, are needed.

Collection infrastructure policies:

- Comments for and against using CAS as part of the collection system for household waste, e.g. “The wording of this policy suggests that the use of authorised civic amenity facilities and bring centres will only be considered where no such kerbside collection service is available. This would be difficult to implement and could also be viewed as being anti-competitive.”
- Amending the policy to promote civic amenity facilities and bring centres, particularly in the case of glass, and that consideration should be given to including a recommendation in the RWMP that glass be specifically excluded from the MDR bin.
- Policy E.2.4 should be a specified policy to liaise with the Department of Agriculture, Food and the Marine and with current authorised collectors of International Catering Waste (ICW), particularly in relation to the issue of lack of disposal options within the region. A listing of relevant ICW lander licensees and ICW transporter licensees should be provided in the RWMP.

Pre-treatment infrastructure policies:

- Local authorities may effectively become market regulators if policies proposed are implemented;
- Must recognise that inadequate infrastructure provision may lead to “waste left on the street”;
- Policy E.3: additional and expanded CAS and bring facilities needed;
- Policy E.5: permanent (or annual at a minimum) hazardous waste collection at CAS” should be supplied;
- Policy E.7: should be expanded to state that the local authorities would support a national scheme.

Recycling – biological treatment policies:

- Concern regarding imposing a ceiling on allowable additional biological treatment;
- Noted that over-capacity is “highly unlikely due to the low incentives available under REFIT”. REFIT issue needs to be addressed;
- Need to support local authorities in continuing to improve management and maintenance at compost facilities and the development of new infrastructure for composting as required, and proposals that utilising the existing gas network to access

and facilitate biogas development is the least net cost and least impact alternative, especially for the consumer and general public.

Recycling – material reprocessing policies:

- In addition to plastics, the RWMP should focus on materials not traded on international markets – waste wood, glass, compost and recycled aggregate as end-of-waste criteria and alternative outlets for these heavier materials would greatly enhance our recycling performance;
- Development of construction and demolition recycling facilities should be encouraged.

Recovery backfilling policies

- Quarry restoration requirements should be fully used;
- Need to recognise construction and demolition fines and how to manage.

Thermal recovery policies:

- A number of submissions objected to the development of waste to energy facilities anywhere in Ireland;
- Quantities identified are likely to serve as limits rather than targets;
- Agreed with the proposed needs and supports the policies;
- Does not want incineration when better alternatives are available;
- Need to strengthen recognition for co-processing;
- Policy E.15:
 - Suggested that if Ireland is to meet the EU circular economy obligations, an extra 300,000 tonne incinerator will not be required, particularly if waste exports continue;
 - Given incineration's reliance on residual waste streams, increased investment is at odds with the Europe-wide commitment to decreasing waste generation;
 - Proposed a "wait and see" approach to identifying specified capacity and timeframes;
 - Undeveloped or unavailable capacity should not block new, needed applications; and
 - The RWMP should commit to a tax on incineration, with or without energy recovery
- Policy E.16: alternatives to thermal treatment of hazardous waste, e.g. could solvents be reused instead of thermally treated?

Disposal policies:

- Policy E.9: overshadowed by data gaps and lack of key information;
- Policy E.11: exclude wording "local authority" to include private sector;
- Must allow for disposal of materials that have no alternative options.

Influence on the Final RWMP

Changes to facility authorisations by local authorities policies:

- **Policy E.2.1** has been amended: The Local Authorities will review the approach to authorising waste treatment facilities requiring a waste facility permit or certificate of registration *having regard to the need to achieve consistency of approach between planning approval and operational capacity.*

Changes to pre-treatment infrastructure policies:

- **Policy E.1** has been amended: Future authorisations by the local authorities, the EPA and An Bord Pleanála of *pre-treatment capacity in the region* must take account of the

authorised and available capacity in the market **while being satisfied the type of processing activity being proposed meets the requirements of Policy E.2;**

- **Policy E.2** has been amended: The future authorisation of pre-treatment activities by local authorities over the plan period will be contingent on the operator demonstrating that the treatment is necessary and the proposed **activities will improve the quality and add value** to the output materials generated at the site;

Changes to public civic amenities and bring centres policies:

- **Policy E.3.B** has been added: ***“The plan supports the development by the private sector of public bring infrastructure (e.g. civic amenity facilities, bring banks) subject to appropriate statutory approvals and in line with appropriate environmental protection criteria”;***

Changes to collection infrastructure policies:

- Policy E.2.2 has been amended and broken out into two new policies, E.2.2a and E.2.2b. **Policy E.2.2A** now reads: The plan supports the primacy of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented; **Policy E.2.2B** which has been added reads: The plan also supports the use of authorised civic amenity facilities and bring centres as part of the integrated collection system;
- **Policy E.2.5** has been amended as follows: “The plan supports the improvement of existing PRIs and the development of new PRIs **or similar industry/voluntary schemes** for specific waste stream including **but not limited to** human and farm chemicals and medicines, paints newspapers, magazines **and bulky waste.**”

Backfilling

- **Policy E.13** has been amended: “Future authorisations by the local authorities, the EPA and An Bord Pleanála must take account of the **scale and availability of existing back filling capacity**”;
- **Policy E.14** has been amended: “The local authorities will co-ordinate the future authorisations of backfilling sites in the region to ensure balanced development serves local and regional needs with a preference for large **restoration** sites ahead of smaller scale sites with shorter life spans. All proposed sites for backfilling activities must comply with environmental protection criteria set out in the plan.”

Changes to thermal recovery policies:

- **Policy E.15** has been amended: The waste plan supports the development of up to 300,000 tonnes of additional thermal recovery capacity for the treatment of non-hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market and the State’s self-sufficiency requirements for the recovery of municipal waste are met. This capacity is a national treatment need and is not specific to the region. ***The extent of capacity determined reflects the predicted needs of the residual waste market to 2030 at the time of preparing the waste plan. Authorisations above this threshold will only be granted if the applicant justifies and verifies the need for the capacity, and the authorities are satisfied it complies with national and regional waste policies and does not pose a risk to future recycling targets.*** All proposed sites for thermal recovery must comply with the environmental protection criteria set out in the plan.
- A new policy E.15b has been added: ***“The waste plan supports the need for thermal recovery capacity to be developed specifically for the on-site treatment of industrial process wastes and where justifiable the treatment of such wastes at merchant thermal recovery facilities.”***

- **Policy E.16** has been amended: “The waste plan supports the development of up to 50,000 tonnes of additional thermal recovery capacity for the treatment of hazardous wastes nationally to ensure that there is adequate active and competitive treatment in the market to facilitate self-sufficiency needs where it is technically, economically and environmentally feasible. The capacity is a national treatment need and is not specific to the **region**. All proposed sites for thermal recovery must comply with the environmental protection criteria set out in the plan.”

Changes to recycling – biological treatment policies:

- **Policy E.17** has been amended: The waste plan supports the development **at least** 40,000 tonnes of additional biological treatment capacity in the region for the treatment of bio-wastes (food waste and green waste) primarily from the region to ensure there is adequate active and competitive treatment in the market. The development of such treatment facilities needs to comply with the relevant environmental protection criteria in the plan.
- **Policy E.18** has been amended: The waste plan supports the development of biological treatment capacity in the region, in particular anaerobic digestion; to primarily treat suitable agri-wastes and other organic wastes including industrial organic waste. The development of such treatment facilities needs to comply with the relevant environmental protection criteria in the plan.

Changes to disposal policies:

- Policy E.9 has been amended and broken out into two new policies, E9a and E9b. **Policy E.9a now reads: “The on-going availability of the existing range of disposal facilities for non-hazardous municipal residual waste across the region will be required during the plan period but the Local Authorities consider that there is no need to provide additional new disposal facilities for non-hazardous municipal residual waste during the plan period over and above the existing level of authorised, operational, inactive or un-commenced facilities in place”;** Policy E.9b now reads: **“The waste plan supports the need for on-going disposal capacity to be developed for on-site generated non-hazardous/hazardous industrial waste over the plan period”;**
- **Policy E.10** has been amended: “The waste plan recognises the need for on-going disposal capacity to be available in response to events which pose a **risk to the environment and/or health of humans & livestock. The local authorities of each region** will monitor available **contingency** capacity annually”;
- **Policy E.11** has been amended: **“The plan supports the consideration of appropriate alternative future land uses at authorised inactive landfills (un-commenced; permanently-closed; or temporarily-closed) –** subject to amendments of existing approvals being put in place. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure protection and preservation of the Natura 2000 Network.
- Potential activities include:
 - *Waste treatment activities including pre-treatment, thermal recovery, biological treatment, reprocessing or preparing for reuse;*
 - *On-site temporary storage of waste and materials;*
 - *Co-location of utility services such as wind farms or other energy generating activities;*
 - *Development of public and recreational amenities;*
 - *Co-locating recycling/reuse waste enterprises on site;*

- *Resource mining; and*
- *Contingency capacity for crisis events **such as risks to the environment and to the health of humans and livestock.***

5.1.7 Enforcement and Regulation (Objective F)

Issue Raised: Enforcement and Regulation (Objective F)

Comments on Policy Action F.4.1:

- Waste collection permit (WCP) conditions should reflect desire to move up hierarchy to reuse;
- All collectors, commercial or social enterprises should be required to have a WCP; and
- Local discretionary conditions should allow the NWCPO to ensure that conditions and fees are not prohibitive to social enterprises working in the reuse.

Other key comments dealing with the enforcement and regulation objective and policies such as:

- Recommended that additional policy statements/actions and need for a policy regarding the consistent enforcement of the food waste regulations and roll out of brown bins;
- Improving the consistency of enforcement and commitment so that enforcement staff cooperate within the region and across the other regions, doing joint actions and sharing information;
- A commitment is needed to increasing the uptake of authorised waste collection services, through enforcement and increased public awareness campaigning;
- Investigating the reuse of surplus edible foods currently discarded as waste.

Influence on the Final RWMP

A new Policy Action F.1.4 has been added:

- ***“Allocate resources to monitor the schedule for roll out of brown bins to households in accordance with the European Union (Household food waste and Bio-waste) Regulations, 2013”;***

A new Policy Action F.2.2 has been added:

- ***“Work in partnership with the compliance schemes and other bodies to address on-going regulatory obligations”;***

Changes to Policy Action F.2.3 amended (previously F.2.2):

- “Maintain high level of site inspections of existing **local authority** waste authorisations and ensure reflected in the RMCEI”;

A new Policy Action F.2.4 has been added:

- ***“Audit waste arisings from non-household waste premises (commercial and similar premises) to determine compliance with relevant regulations including commercial food waste regulations as reflected in the RMCEI”;***

Changes to Section 8.3.6:

- Text added to mention ***social enterprises which redistribute surplus edible foods;***

Changes to Section 17.2.1:

- Text added to state: ***“Identify, coordinate and facilitate the training needs of the Region to ensure effective implementation of the plan”;***

Changes to Policy Action target F.3.3:

- Amended to: ***“Prevent and address unauthorised activities in the region.”***

5.1.8 Protection Actions (Objective G)**Issue Raised: Protection Actions (Objective G)**

The slow progress on risk assessment of sites was commented on by some stakeholders.

Comments on Policy G2 and corresponding actions:

- The policies were described as vague and non-committal and unlikely to prevent further ECJ investigation, particularly with a target of Q1 2021 for the preparation of applications to the EPA for authorisation.
- Suggested that the policy should be reworded to “state subject to funding from the DECLG becoming available”;
- It was noted that the plan should address the resolution of the issues regarding the eight unregulated landfills in County Clare including an appropriate method of funding their remediation;
- The risks assessments undertaken need to be communicated to the relevant stakeholders;
- The landfill gas potential of historic and landfill sites should be assessed;
- The indicator for Policy Action G.2.3 should be changed to the number of applications.

Comments on Policy Action G.3.1 and corresponding actions:

- It was recommended that the plan should provide comprehensive spatial guidance and criteria to waste recovery and waste facilities in the region in order to ensure that each local authority in the region would have a common and consistent plan-led approach to the location of waste management facilities; and
- The siting criteria published should include ascertaining whether there is an airport within 13 km of the proposed facility, and requiring that the airport is consulted at an early stage, with any comments and concerns taken into account.

Comments on Policy G.4 and corresponding actions:

- It was suggested that households’ rate of collection and unaccounted for waste appear to inadequately reflect the waste brought to civic amenity sites (CAS);
- It was recommended that unmanaged household waste should be subject to a year on year target reduction;
- It was recommended that the plan should include a specific policy to work closely with the CSO and its quarterly household survey;
- It was highlighted that Collectors must not be allowed to “cherry pick” population centres;
- Statutory declarations should be used to identify where householders dispose of their waste. Door-to-door enforcement should be a follow-on measure;
- Suggested that the optimum way to address this issue is by a county-based enforcement team.

Influence on the Final RWMP**Changes to Policy Action G.2.3 indicator:**

- Amended to state ***“number of applications submitted”***.

New Policy Action G.3.2 added:

- ***“Prepare an environmental checklist for planning to aid decision making”*** with an expected timeline of the end of 2015.

Changes to Policy Action G.4.1:

- Expected timeline has been changed to the **end of 2016** to coincide with the implementation of the forthcoming household regulations.

Changes to Policy Action G.4.2:

- Amended to state ***“Design and implement a programme to regulate, enforce and communicate in areas with low collection coverage, including the negative health and environmental impacts of burning/illegal dumping”***.

5.1.9 Other Waste Streams Actions (Objective H)**Issue Raised: Other Waste Streams Actions (Objective H)****Comments on Policy Action H.1.1:**

- The plan should state that sewage sludge is a resource and that outlets for its reuse should be sustained and developed;

Comments on Policy H.2:

- Stakeholders recommended more collections; establishing new extended producer responsibility initiatives; and establishing a more innovative and effective symbiosis programme.

Comments on Policy Action H.2.2:

- Pilot projects should be undertaken with CAS to deal with post-consumer items;

Comments on Policy H.3:

- Suggestions offered in relation to financing mechanisms;
- Producer compliance schemes should better reflect the waste hierarchy and set targets for reuse and recycling.

Influence on the Final RWMP**Changes to Policy H.2:**

- The words ***“hazardous and non-hazardous waste streams”*** have been included to ensure there is no ambiguity in the policy;

Changes to Policy Action H.2.2:

- Reworded to include pilot reuse schemes and remove references to particular waste streams, thereby making it clearer to the reader. It now states ***“Examine the possibility of expanding *pilot and* existing reuse schemes in place throughout the region”***;

Changes to Policy Action H.3.2:

- Reworded to include ***“farms”***.

5.1.10 SEA and NIR**Issues Raised: SEA and NIR**

One submission received noted that the **SEA** failed to identify how it would comply with Article 11 and Article 191 of the Treaty on the Functioning of the European Union (TFEU), particularly

with regard to protection of the environment and sustainability. It was also suggested that the SEA failed to identify how tiering of SEA and EIA would be achieved.

Submissions were received in relation to the **Biodiversity Flora and Fauna** sections of the SEA and also the **Natura Impact Report** for the plan. Specific issues in relation to the SEA included:

- Chapter 19 should be expanded to include environmental policies that reflect the conclusions of the assessments, and fully incorporate the mitigation required to support those conclusions;
- The Environmental Report should include information on species protected at the national level;
- Refuges for fauna should be included in Table 5.3;
- More plan-specific indicators are required for SEO 1.

Specific issues in relation to the AA included:

- Legacy issues associated with existing sites;
- Mapping of existing facilities in relation to European Sites is required;
- Appropriate assessments must be undertaken in view of the implications for the conservation objectives of these sites;
- Future authorisations have potential to negatively impact the receiving environment if sited or managed inappropriately;
- Assumption made that all existing facilities are compliant;
- Consideration of Article 6(2) of the Habitats Directive;
- Plan level mitigation which anticipates problems from implementation of the plan should be developed and incorporated into the plan;
- Freshwater Pearl Mussel Plans should be considered;
- Potential for transboundary impacts should be considered.

The following amendments should be made to the **Strategic Environmental Objectives**:

- SEO 1 should reference restore;
- SEO 11 should reference Sites and Monuments Record (Department of Arts, Heritage and the Gaeltacht) as a source and responsibility.

The issue of **climate change** was raised by some stakeholders, in terms of both the impact of waste generation and management activities on climate change and, conversely, the impact of climate on waste management.

A number of submissions were received in relation to **protection of the aquatic environment** specifically. Protection needs to include not just a focus on water quality but protection and maintenance of physical habitat and hydrological processes/regimes. Other commentary related to the requirement for the Plan to comply with the Water Framework Directive.

It was suggested that the SEA and Plan **monitoring** should be integrated.

Protection of geological heritage was raised by stakeholders with particular reference to the need to include information on Geological Heritage sites into the **baseline** description provided in the SEA Environmental Report. Table 5.21 of the Environmental Report should include relevant county totals of Monument Records.

The inclusion of appropriate **siting criteria** in the plan was acknowledged and welcomed in the submissions. Some suggestions were made to strengthen the criteria, including widening the scope to include expansions, reviews and increases to existing permitted and consented activities.

Additional **P/P** were suggested for consideration in the SEA Environmental Report , Chapter 4:

- *National (Northern Ireland): Northern Ireland Waste Management Strategy, Delivering Resource Efficiency (2013);*
- *Regional (Northern Ireland): North West Region Group Waste Management Plan 2013–2020 ; and SWaMP2008 Waste Management Plan 2013–2020;*
- Table 4.2 has been amended to include *the Marine Strategy Framework Directive (2008/56/EC)* under the European entries.

Influence on the Final RWMP

- **SEA:** The SEA has ensured that there has been integration of environmental considerations into the development of the RWMP. This has taken the form of consideration of alternatives, influencing of policy and policy action wording, addition of new policies and policy actions and additional supporting text reflecting on significant environmental issues such as protection of European Sites and climate change. Additional text has been included in the Environmental Report to clarify tiering of assessment under SEA and EIA (see addendum in Chapter 8 of this SEA Statement).
- **Biodiversity Flora and Fauna:** Environmental protection criteria (previously referred to as siting criteria) have been reworked to include protection criteria related to both new infrastructure and existing activities (including expansions/upgrades/reviews) to these existing activities. Additional policies and policy actions have also been included in Chapter 19 to further strengthen the protection of biodiversity, flora and fauna generally. Policy actions under G. Protection in particular reflect protection of the environment and biodiversity, and new policy actions have been included at G.3.2 and G.5.1. Additional text on biodiversity protected under national legislation has been included in the Environmental Report. In addition, SEO1 has been amended to refer to “restore” and Table 5.3 has been updated to include reference to Refuges for Fauna (see addendum in Chapter 8 of this SEA Statement).
- **Natura Impact Report:** Broadly, three aspects of the RWMP were considered to hold potential for significant effects on European Sites and have been addressed in the plan as follows:
 1. New waste management infrastructure to deliver on identified capacity needs has the potential to impact on European Sites. To that end, the plan includes Environmental Criteria (previously siting criteria) which specifically seek to avoid effects on these European Sites.
 2. Existing waste management infrastructure and activities may be negatively impacting on European Sites. A new policy G5 and policy action G.5.1 have been added to Chapter 19 to specifically address this issue.
 3. Remediation of historic unregulated landfills in Ireland and the repatriation of residual waste from Northern Ireland for disposal. The AA recognised that the potential for effects will be determined by the site conditions on a case by case basis and the requirement to complete an AA Screening at all tiers¹ has been included in the plans: This approach ensures that the decisions made in relation to remediation firstly consider potential effects on these protected sites and classify them accordingly in terms of site sensitivity (high, medium and low risk) as per Tier 1. At

¹ Tier 1 (qualitative risk assessment); Tier 2 (site investigation and risk refinement); and Tier 3 (quantitative risk assessment).

Tiers 2 and 3, appropriate site detail will be available to ensure that site-specific appropriate protection is built into remediation proposals to ensure that they protect, enhance and restore European Sites in view of the Sites' conservation objectives and the high-risk sites will be dealt with as a priority. The NIR has been updated (under separate cover) to address the issues raised during consultation.

- **Strategic Environmental Objectives:** SEO 1 and SEO 11 have been updated (see addendum in Chapter 8 of this SEA Statement).
- **Climate change:** In addition to the overall strategic vision of the regional waste plans which seeks to redefine waste as a material resource rather than an end product, the final plans now include additional text in Sections 5.2 and 16.5 dealing with climate change in relation to generation and management of wastes. The plans refocus priorities from recycling up to reduce and reuse tiers to harness the wider benefits associated with prevention by reducing emissions from processing of virgin materials, transport of products, treatment of wastes and treatment/transport of residues. Furthermore, a new policy action has been included in the final plan at G3.2: Undertake a risk assessment of all waste disposal sites in coastal and estuarine areas to identify those at risk from coastal erosion in the short, medium and long term. The purpose of this action is to ensure that climate proofing measures are implemented at sites identified as being of high risk to prevent impacts on the environment
- **Protection of aquatic environments:** The following reference to protection of aquatic ecology has been added to Section 16.5 of the final plan: To protect river habitats and water quality (including physical habitat and hydrological processes/regimes), ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15 m measured from each bank of any river, stream or watercourse. In addition, specific reference to the Water Framework Directive has been included in Policy Action G.2.4 and again in Section 16.5.
- **Monitoring:** The targets and indicators from the SEA monitoring programme have been integrated into the RWMP monitoring programme.
- **Baseline data.** Additional text has been added to Section 5.2.3 of the Environmental Report in relation to Geological Heritage Areas (see addendum in Chapter 8 of this SEA Statement).
- **Siting Criteria:** The siting criteria presented in the draft RWMP at Section 16.5 and supporting text have been reviewed and updated based on feedback in submissions and further consideration by the SEA and AA teams. The criteria have been renamed *Environmental Protection Criteria* to more accurately reflect the protection of the environment and human health. Furthermore the criteria in relation to water quality have been revised to specifically reference the Water Framework Directive and references to protection of the physical quality of the aquatic environment, not just the water quality element.
- **Suggested Plans and Programmes:** The following P/P have been added to the Environmental Report (see Chapter 8 of this statement for the addendum to the Environmental Report):

National (Northern Ireland): Northern Ireland Waste Management Strategy, Delivering Resource Efficiency (2013)

Regional (Northern Ireland): North West Region Group Waste Management Plan 2013–2020 ; and SWaMP2008 Waste Management Plan 2013–2020

Table 4.2 has been amended to include *the Marine Strategy Framework Directive (2008/56/EC)* under the European entries.

6 PREFERRED SCENARIO AND REASON FOR CHOOSING THE FINAL RWMP

The consideration of alternatives is a requirement of the SEA Directive (2001/42/EC). It states under Article 5(1) that:

Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.

Annex 1 (h) of the Directive clarifies that the information to be provided on alternatives under Article 5(1) is *inter alia* an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. Article 9 of the Directive requires that a statement shall be prepared providing information on the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.

Annex 1 (f) details the environmental topics to be considered in the evaluation of the alternatives, which is the same as that addressed in the assessment of the plan itself: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

In summary, the Directive emphasises that the SEA process must consider alternatives that are “reasonable”, and take into account “the objectives” of the plan, and “the geographical scope of the plan”.

6.1 ALTERNATIVES CONSIDERED FOR THE SOUTHERN REGION WASTE MANAGEMENT PLAN

The Project Team (including waste, SEA and AA specialists) had early discussion of possible alternatives in order to inform the scoping for the draft waste plan, which was the subject of public consultation. Further workshops and meetings were held by the Project Team to advance generation of alternatives and development of policies and policy wording.

At the strategic level, given the statutory requirement (under both EU and national waste management legislation) for the draft waste plan to be reviewed and updated, it was not proposed to assess a do nothing scenario or business as usual scenarios as neither were considered realistic given that there has been a significant change in the make-up of waste regions since the last RWMPs were published. A modified business as usual was initially considered wherein the policies remain unchanged from the previous regional plans and only the revised boundaries are considered. However, it was noted that the decision on the new waste regions was taken at a higher level and policy outlined in the Government National Waste Policy document, *A Resource Opportunity*.² It

²A Resource Opportunity. Waste Management Policy in Ireland, DECLG 2012

concluded that changing national policy was not a reasonable alternative for consideration within the regional plan context.

Early discussions with the plan team identified three issues of a strategic nature which could drive the direction of the plan. These issues and their reasonable alternatives were considered by the SEA team and outcomes fed back to the plan team for consideration. The issues and alternatives were:

- Retaining a linear economy model versus shifting towards a circular economy model;
- Self-sufficiency versus reliance on exports for treatment (recovery) of residual municipal type waste; and
- Inclusion of mandatory targets only or inclusion of additional non-mandatory targets.

Furthermore, following on from consideration of the strategic alternatives, the plan, SEA and AA teams considered alternatives under key strategic policy areas as follows:

- Policy and legislation;
- Prevention;
- Resource efficiency and circular economy;
- Coordination;
- Infrastructure;
- Enforcement and regulation;
- Protection; and
- Other waste streams.

Based on the outcome of the assessment of alternatives, a preferred strategy was developed by the plan team which included policies and policy actions. These policies and policy actions were the subject of a detailed assessment by both the SEA and AA teams.

6.2 PREFERRED SCENARIO

6.2.1 Strategic Direction

Retaining a linear economy model versus shifting towards a circular economy model

The preferred alternative is the circular economy. The circular model alternative focuses on reducing waste and resource loss by re-manufacturing, reusing and recycling materials and products such that one person or industry's waste becomes another's raw material. This approach requires a fundamental shift in how producers and consumers interact in the supply chain. Manufacturers for example must produce items that: have a longer life cycle which allows for repair rather than disposal if broken; can be disassembled and refurbished rather than replaced; contain materials which can be recycled and recovered rather than outright disposal of all components. For manufacturers to make this shift they have to be sure consumers will follow.

This model involves a mind and business shift across all sectors if it is to be realised properly; there are examples of individual regenerative cycles in Ireland but a full-scale shift to this way of thinking, building and reclaiming has not yet occurred. Environmentally a shift of this nature would reduce the need for virgin materials, which would in turn lead to reduced emissions to air and water. This would have significant positive long-term effects for air quality and climate in particular and also on water quality. Indirectly this would also have positive impacts for biodiversity and human health. As the bulk of our resources are imported, transport-related emissions would also reduce, with direct positive impacts for air quality and climate and indirect impacts for human health and biodiversity. The move to this model would likely see an increase in activity in the secondary material market with indigenous reuse/refurbishment activities developing, with environmental and social benefits.

Examples of this are already happening in Ireland at both the individual level and industry level, e.g. SMILE Resource Exchange is a Cork-based organisation operated by MacroomE and is a public body partnership. SMILE stands for Saving Money through Industry Links & Exchanges. It is a network of businesses that reuse each other's surplus products, by-products and reusable items in order to save money and help the environment by extending the life of materials and diverting waste from landfill. The network is created through an online platform of listed items, e.g. wanted items/available items and through face to face resource exchange events. These activities have resulted in savings of raw materials and energy usage as well as environmental benefits from reduced emissions to water, air (e.g. CO₂, GHG) etc.

In recent years a number of carbon calculator tools (Greenhouse Gas Protocol, PAS 2050, ISO 14067) have been devised to identify the carbon footprint of products through the full life cycle (i.e. from cradle to grave). The life cycle analysis considers the footprint of raw materials, transport, production, packaging, waste, etc. This has enabled producers to identify the carbon footprint from virgin materials (i.e. the linear economy model) and from recycled materials (i.e. the circular model economy) to allow for comparison of the relative footprint of each model.

As an example, recycling aluminium (circular model) saves 95% of the energy required to produce aluminium from raw materials (linear model) (source: Repak). The comparison for other waste streams would vary, but typically the recycled material has a lower footprint than the virgin material. This is true not only of greenhouse gases but also in relation to other air emissions such as acidifying gases. As such, emissions from the circular economy model are typically lower than those from the linear economy model, illustrating that from an air quality and climate sustainability perspective the circular model is the preferred alternative.

Summary of significant impacts of these alternatives:

	BFF*	PHH	S	W	AQ	CF	MA	CH	L	Soc
Linear	–	–	–	–	–	–	+/-	+/-	+/-	–
Circular	+	+	+	+	+	+	+/-	+	+	+

BFF (Biodiversity, Flora and Fauna); PHH (Population/Human Health); S (Soils); W (Water); AQ (Air Quality); CF (Climatic Factors); CH (Cultural Heritage); L (Landscape); and Soc (Social). Positive impact (+); Negative impact (–); Both positive and negative impacts (+/–); and Neutral (0).

Self-sufficiency versus reliance on exports for treatment of residual municipal type waste

The preferred alternative is self-sufficiency for municipal type residual waste. One of the biggest issues associated with export versus self-sufficiency relates to where impacts and benefits are actually felt. By exporting waste we export many of the associated impacts including emissions to air and water and transport emissions.

In terms of air quality and greenhouse gases, the principal impact relating to this strategic policy relates to transport emissions including both road and shipping emissions. The extent of the impact is largely dependent on the distance travelled and to a lesser extent the mode of transport. The average GHG emissions per tonne of cargo for road and shipping freight as devised by Department for the Environment, Food and Rural Affairs, UK (Defra) are listed below:

- Average HGV 0.14993 kg CO_{2e} per tonne.km
- Average container ship 0.01906 kg CO_{2e} per tonne.km

The figures indicate that transporting waste by ship generates less GHG per km than transport by road, as shipping is more efficient in transporting waste. However, the distance travelled is also a critical element to consider.

In 2013 over 300,000 of residual municipal waste was exported from the State, accounting for approximately 20% of the residual waste market. Most of this waste (97%) was exported to the Netherlands (47%), Germany (28%), Sweden (13%) and Denmark (9%).

For illustration, two scenarios are presented in the table – a self-sufficiency target scenario and an export scenario to illustrate the scale in transport-related GHG emissions from the two options. It can be assumed that the disposal/recovery emissions are largely similar for the two scenarios, so these are not included in the analysis.

Scenario	Description	Transport GHG Emissions (kg CO _{2e} per tonne)
Self-sufficiency	Transport of waste from a WTS in the Southern Region 100 km to a waste treatment facility within the region.	14.99
Export	Transport of waste from a WTS in the Southern Region 100 km to the Port of Cork and via ship to the Port of Rotterdam (1057 km) and to a waste treatment facility within 100 km of the port.	50.13

In the sample scenario, GHG transport emissions per tonne of waste for exporting the waste are approximately 3.3 times greater than the self-sufficiency option. The relative differences would change for other European ports which would be at greater distances from the Port of Cork. Furthermore, any exports outside the EU would generate even higher GHG emissions from transport.

It is also important to note that the self-sufficiency option will have localised air quality impacts within the region, in particular the immediate areas around the waste facilities. These may be nuisance impacts such as dust and odour as well as health-based impacts such as emissions of combustion gases and fine particulates. These localised effects are addressed through the waste licensing/permitting regime and regulated by the EPA and local authorities. While these impacts are

important on a local level, the regional impact of the transport element is the principal driver in this assessment.

Transport-related emissions also have the potential for negative impacts on the aquatic environment (both freshwater and marine environments), on biodiversity, flora and fauna from deterioration in air and water quality, from disturbance of habitats and collisions with marine mammals. The contribution of transport to GHG emissions also has consequences for climate change and in particular flooding, which in turn has negative impacts for population, human health, biodiversity and material assets.

Inadequate indigenous solutions for residual waste treatment have the potential for negative effects for material assets such as jobs and economic benefits associated with the infrastructure and treatment of the wastes. The value of residual waste exports is a loss to Ireland in terms of the revenue generated from gate fees and more importantly the energy, in the form of electricity and heat, produced and sold by European recovery facilities to end users.

The lack of an adequate indigenous treatment market will result in a continued reliance on the export market, and long-term market uncertainty will remain. Market operators and the State will be vulnerable to potential market shocks and increasing treatment prices. It is likely that the levels of available treatment capacity overseas will decline over the plan period, with older plants in Northern Europe expected to close or reach their end of life. Foreign direct investment may be lost and the potential economic and job creation gains from treating residual waste in Ireland will continue to be exported overseas.

The self-sufficiency alternative has itself potential for negative effects which would be felt within Ireland as new facilities would need to be built resulting in land use changes, emissions to air and water (albeit controlled), disturbance of biodiversity, flora and fauna and populations to facilitate new builds, etc. Any facility located within Ireland will have the potential for some emissions locally compared to the scenario where waste is exported (see example above for comparison). However, these impacts should not be significant as they will be controlled by the waste and IED licensing system. Emissions from facilities must be within licensed emission levels, which are based on standards intended to protect human health and the environment. Any facility with the potential for energy recovery will deliver environmental benefits by offsetting the use of other fossil fuels, and in many instances will be regarded as producing renewable energy.

However, this alternative offers the greater potential to develop a more sustainable and stable system for the long-term management of residual wastes. The value of residual waste, from both an economic and an environmental perspective, would be realised to the benefit of Ireland, its citizens and businesses. New indigenous infrastructure for residual waste would be viewed as part of the wider strategy for managing wastes consistent with the waste treatment hierarchy.

Summary of significant impacts of these alternatives:

	BFF	PHH	S	W	AQ	CF	MA	CH	L	Soc
Self-sufficiency	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
Export	+/-	0	0	+/-	+/-	+/-	-	0	0	0

BFF (Biodiversity, Flora and Fauna); PHH (Population/Human Health); S (Soils); W (Water); AQ (Air Quality); CF (Climatic Factors); CH (Cultural Heritage); L (Landscape); and Soc (Social). Positive impact (+); Negative impact (-); Both positive and negative impacts (+/-); and Neutral (0).

Inclusion of mandatory targets only or inclusion of additional non-mandatory targets

In overall terms mandatory and non-mandatory targets will bring positive environmental, economic and social benefits. The inclusion of the non-mandatory targets will help to stimulate prevention, reuse and recycling activities at the household and municipal levels which will potentially lead to job creation and employment. Employment in the reuse area often has a community and social aspect, creating in many instances employment for long-term unemployed and vulnerable members of society. The extension of product life through reuse and the use of recyclate in products coinciding with increased diversion of materials from disposal routes has benefits on raw material resources, air emissions, water, and energy which have indirect positive effects on biodiversity, flora and fauna, human health, soils and climate.

Prevention and reuse sit higher on the waste hierarchy and will bring net positive effects by reducing waste generation. Greater recycling targets will extend product life, expand the collection and use of recyclate and create potential opportunities for processing and reprocessing of new types of fractions extracted from the waste stream. Higher order treatment and pre-treatment of waste over direct disposal to landfill will lead to better management cycles for wastes. The non-mandatory targets will have direct benefits on raw materials, air emissions, water, and energy which have indirect positive effects on BFF, PHH, S and CF. They will also have positive direct impacts on the economy, employment and society and may have indirect impacts at construction and/or operational stages.

Thus use of either alternative will lead to a net decrease in waste generation and consequently indirect positive impacts for AQ and CF in particular through reduced emissions of GHG and air pollutants from the transport, treatment and disposal of waste material. Indirect positive impacts for soils, water, BFF and PHH would also be anticipated. In this regard both options represent a positive impact.

Summary of significant impacts of these alternatives:

	BFF	PHH	S	W	AQ	CF	MA	CH	L	Soc
Mandatory targets only	+	+	+	+	+	+	+	+	+	+/-
Additional Non-mandatory targets	+	+	+	+	+	+	+	+	+	+

BFF (Biodiversity, Flora and Fauna); PHH (Population/Human Health); S (Soils); W (Water); AQ (Air Quality); CF (Climatic Factors); CH (Cultural Heritage); L (Landscape); and Soc (Social). Positive impact (+); Negative impact (-); Both positive and negative impacts (+/-); and Neutral (0).

6.2.2 Strategic Policy Alternatives

Policy and legislation

Alternative 1: Compliance with policy and legislative requirements.	<p>Preferred Alternative: The preferred alternative in this instance is <i>compliance with policy and legislative requirements (Policy and Legislation Alt1.)</i></p> <p>Reason for Choosing the Preferred Alternative: It is considered that no reasonable alternative exists in terms of compliance with existing legislation and policy.</p>
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Prevention

<p>Alternative 1: Funding of prevention activities by local authorities and the EPA continues and the allocation of prevention funds is itemised each year (as per policy action B.1.3).</p>	<p>Preferred Alternative: The preferred alternative in this instance is that <i>funding of prevention activities by local authorities continues and the allocation of prevention funds is itemised each year (Prevention Alt1.)</i></p>
<p>Alternative 2: Funding of prevention initiatives continues to be reduced by local authorities and government.</p>	<p>Reason for Choosing the Preferred Alternative: As priority is being given to the top tiers of the waste hierarchy in the draft RWMP, there is high potential to decrease waste generation, subject to successful implementation, which would have positive impacts for all environmental receptors.</p>

Resource Efficiency and the Circular Economy

<p>Alternative 1: Enterprises whose activities sit on the <i>Preparing for Reuse</i> tier are authorised by local authorities in a manner reflecting the nature of their activity.</p>	<p>Preferred Alternative: The preferred alternative in this instance is that <i>enterprises whose activities sit on the Preparing for Reuse tier are authorised by local authorities in a manner reflecting the nature of their activity (Prep for Reuse Alt1.)</i></p>
<p>Alternative 2: <i>Preparing for Reuse</i> facilities are required to apply and comply with a waste authorisation and its conditions.</p>	<p>Reason for Choosing the Preferred Alternative: While regulation of these activities would provide positive impacts for the receiving environment, it is recognised that many of these cottage-style industries that have developed in this sphere may be forced to cease operating or dissuaded from setting up in the first place under the current regulatory system. The positive impacts associated with activities which are more resource efficient would be lost and materials would be returned to the waste system for lower tier treatment. However, the liabilities to human health and the environment cannot be overlooked and as such it is recommended that Alt1 be amended to ensure that a Code of Practice be prepared, the details of which are outlined in the required mitigation section below.</p> <p>Required Mitigation: A Code of Practice shall be prepared for <i>Preparation for Reuse</i> activities and this will be rolled out alongside education and awareness campaigns at the local level to assist operators in delivering a positive sustainable service. Registration of activities should also be considered.</p>

Coordination

<p>Alternative 1: The Regional Waste Office leads the coordination of activities by local authorities in the region to implement the policy actions in the Plan.</p>	<p>Preferred Alternative: The preferred alternative in this instance is <i>leadership from the regional waste</i></p>
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	<i>office (Coordination Alt1.)</i>
Alternative 2: One or more local authorities in the region continue to work unilaterally, implementing local level activities without a regional focus.	Reason for Choosing the Preferred Alternative: A coordinated approach to waste management is essential to ensure a consistent message on the benefits of prevention as the pinnacle of the hierarchy, recycling and also to ensure effective regulation and enforcement of waste management activities. A coordinated approach also provides the opportunity to coordinate the use of limited funding in the most effective and targeted manner, resulting in a greater return on this important investment.

Infrastructure (Collection)

Alternative 1: Continued development of collection and recycling systems including continued rollout of the brown bin collection scheme to households and businesses.	<p>Preferred Alternative: The preferred alternative in this instance is <i>Collection and Recycling Alt1</i>.</p> <p>Reason for Choosing the Preferred Alternative: <i>This alternative</i> would see the greatest potential for increasing both the quantity and quality of recyclable materials and diverting material from the residual bin and lower waste tiers such as disposal. It is acknowledged that this alternative may require provision of additional recovery/recycling processing facilities which could have negative impacts on the environment if sited inappropriately, and as such guidance on appropriate siting is required.</p> <p>Required Mitigation: An awareness campaign to support the rollout of brown bins is required. Ongoing review of the feasibility for indigenous paper, glass and metal recycling capacity is required as part of the overall policy ambition of self-sufficiency to determine if volumes of waste could reasonably support smaller regional facilities rather than sending them for export.</p>
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Infrastructure (Thermal Recovery)

Alternative 1: Existing active recovery capacity in Ireland remains active but other pending capacity does not come on stream during the period and no other new capacity is developed.	Preferred Alternative: The preferred alternative in this instance is <i>the provision of additional recovery capacity for residual waste treatment Alt2</i> .
Alternative 2: Existing active recovery capacity remains active and other pending capacity comes on stream during the period as a minimum.	Reason for Choosing the Preferred Alternative: Alt2 provides the best opportunity to derive value from residual waste produced in Ireland. The recovery of energy is a critically important part of these facilities and offers the potential to off-set use of fossil fuels domestically in Ireland with positive impacts for material assets, air quality and climate.

Infrastructure (Backfilling)

Alternative 1: Coordinated centralised facilities with a longer lifespan.	<p>Preferred Alternative: The preferred alternative in this instance is <i>greater control on the management of stone and soils, Other Waste Streams Alt1</i>.</p> <p>Reason for Choosing the Preferred Alternative: Larger more centralised sites with a longer lifespan will lead to better coordination of controls along with better enforcement, which has positive impacts in particular for land use, biodiversity, flora and fauna, water, landscape, air quality and cultural heritage. This however is dependent on the development and application of siting guidance.</p> <p>Mitigation: Future authorisations for backfilling should ensure proper siting of facilities in line with appropriate siting guidance.</p>
Alternative 2: Uncoordinated proliferation of smaller sites.	

Infrastructure (Disposal)

Alternative 1: Ireland continues to send residual waste to landfill albeit in line with the diversion target threshold limits.	<p>Preferred Alternative: The preferred alternative in this instance is to <i>eliminate landfills completely (Disposal Alt2)</i>.</p> <p>Reason for Choosing the Preferred Alternative: The elimination of landfill for MSW, although possibly unachievable in the short term, should none the less be the objective of the plans in order to deliver a sustainable long-term solution to waste management. The negative environmental impacts associated with landfilling are now widely recognised as being unacceptable and legislation and policy are driving a shift from disposal to higher tier alternatives. These solutions, such as reuse, recycling and recovering wastes, deliver greater environmental benefits.</p>
Alternative 2: Move away from disposal of MSW to landfill.	

Regulation and Enforcement

Alternative 1: The establishment of a regional office for the coordination and implementation of enforcement activities.	<p>Preferred Alternative: The preferred alternative in this instance is leadership from the regional waste office (<i>Regulation and Enforcement Alt1</i>).</p> <p>Reason for Choosing the Preferred Alternative: A coordinated approach to waste management is essential to ensure better management of wastes in the region. A coordinated approach to regulation and enforcement provides an opportunity to use resources and funding in the most effective and targeted manner, resulting in greater impact from these activities.</p>
Alternative 2: Enforcement activities are delivered primarily by individual local authorities in the region.	

Protection

<p>Alternative 1: All high-risk landfill (Class A) sites (1977–1996) and pre-1977 (Class A) sites are remediated.</p>	<p>Preferred Alternative: The preferred alternative in this instance is remediation of all identified high-risk sites <i>Alt1</i>.</p>
<p>Alternative 2: Remediation of all identified high-risk landfill (Class A) sites (1977–1996) and pre-1977 (Class A) sites is not prioritised in the Plan.</p>	<p>Reason for Choosing the Preferred Alternative: Significant risk is posed by these historic landfill sites to both human health and the environment. The prioritisation of remediation is vital to ensure risk to the environment can be appropriately dealt with.</p>
	<p>Mitigation: To mitigate the potential spread of IAS, a qualified ecologist should undertake a survey for IAS before waste is disturbed. A management plan to ensure IAS are not spread from the site will be developed if such species are identified. To mitigate the potential to impact on the Natura 2000 network, AA screening shall be carried out before remediation is undertaken.</p>

Other Waste Streams

<p>Alternative 1: The coordinated management of sludges (domestic, sewage and agricultural) is addressed in the Plan.</p>	<p>Preferred Alternative: The preferred alternative in this instance is the coordinated management of sludges <i>Alt1</i>.</p>
<p>Alternative 2: A business as usual scenario in relation to management of sludges (domestic, sewage and agricultural) is considered in the Plan.</p>	<p>Reason for Choosing the Preferred Alternative: A coordinated approach which sees the lead authorities work with Irish Water and the agricultural sector to deliver sustainable management solutions will have overall positive impacts on the environment.</p>
	<p>Mitigation: Any proposed facilities for the treatment of sludges should adhere to appropriate siting guidelines.</p>

6.3 OVERALL PREFERRED SCENARIO

The preferred scenario is to put into place coherent policy objectives and actions which align with European and national policy and support Ireland's move to an economy defined by higher resource efficiency and productivity. This proposed strategy is focused on recognising the important role the waste sector has to play in helping Ireland's households, businesses and industry in the transition towards a more resource efficient and circular economy.

The strategic vision for the RWMP can be summarised as:

To rethink the approach to managing wastes, by viewing waste streams as valuable material resources which can lead to a healthier environment and sustainable commercial opportunities for our economy.

Underpinning this overarching strategic vision is a set of core principles which will guide the delivery of a sustainable RWMP. These principles include:

- Application of the waste management hierarchy;
- Source-segregation;
- Polluter pays principle;
- Balanced and sustainable infrastructure;
- Self-sufficiency and proximity;
- Opportunity and growth;
- Cooperation; and
- Environmental protection.

7 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE ADOPTED RWMP

7.1 INTRODUCTION

Article 10 of the SEA Directive requires that monitoring be carried out in order to identify, at an early stage, any unforeseen adverse effects due to implementation of a Plan or Programme, and to be able to take remedial action. Monitoring is carried out by reporting on a set of indicators, which enable positive and negative impacts on the environment to be measured. The environmental targets and indicators of relevance to this RWMP were identified from the SEA process. These targets and indicators will be used to identify unforeseen adverse effects from implementation of the RWMP.

7.2 RESPONSIBILITY FOR MONITORING

Coordination of monitoring of the Southern Region Waste Management Plan will be carried out by Limerick City and County Council/Tipperary County Council as the lead authorities for the RWMP.

7.3 SOURCES OF INFORMATION FOR MONITORING

Monitoring will focus on aspects of the environment that are likely to be significantly impacted by the RWMP. Where possible, indicators have been chosen based on the availability of the necessary information and the degree to which the data will allow the target to be linked directly with the implementation of the RWMP. **Table 7.1** presents the environmental monitoring and reporting programme to track progress towards achieving the strategic environmental targets, and includes sources of relevant information.

Table 7-1 Environmental Monitoring Programme

Strategic Objective	Target	Indicator	Sources & Responsibilities
Obj. 1: Biodiversity Flora and Fauna (BFF_1) Preserve, protect, maintain and, where appropriate, restore the terrestrial, aquatic and soil biodiversity, particularly EU and nationally designated sites and protected species.	Majority of habitats or species in, or moving towards, favourable conservation status. [Based on national Target 17 of Ireland's Action Plan for Biodiversity 2011–2016].	The status of protected habitats and species as reported to the EU (report due every six years, first report in 2007).	The Status of EU Protected Habitats and Species in Ireland report. Published every six years, National Parks & Wildlife Service (NPWS).
Obj. 2: Biodiversity Flora and Fauna (BFF_2) Integrate biodiversity considerations into the RWMP.	Ensure mitigation measures from the RWMP SEA and AA are fully implemented within the plan period.	Audit of progress in the implementation of mitigation measures two years post adoption of the plan and at completion of the plan period.	Lead Authority, local authorities. SEA mitigation measures proposed in relation to policy actions.
Obj. 3: Population and Human Health (PHH_1) Protect human health from the impacts of waste management by ensuring waste prevention and related activities are promoted at community and individual level.	Increase expenditure on waste prevention activities (including education, awareness, training, etc.) to a minimum of 0.15c/inhabitant.	Total prevention/reuse budget per annum in each local authority as a % of total spend on waste management.	Financial Returns/Annual budget for local authorities to be reported to the Lead Authority.
Obj. 4: Population and Human Health (PHH_2) Promote and encourage access and services for appropriate waste management for all.	Increase the number of households availing of kerbside waste collection services, prioritising areas with existing low uptake.	Number of households in the region on a kerbside collection. Quantity of unmanaged waste in the region.	Waste statistics data from local authorities, private waste collectors, Lead Authority. National Waste Bulletin, published annually, Environmental Protection Agency (EPA).
Obj. 5: Soils	Rollout the plan for remediating historic closed	Number of authorisations granted	Historic Unregistered Landfill Sites

Strategic Objective	Target	Indicator	Sources & Responsibilities
Safeguard soil quality and quantity from waste and reduce soil contamination.	landfills prioritising actions to those sites which are the highest risk to the environment and human health	for sites to be remediated. Number of authorised sites remediated in the region.	Register held by local authorities. Historic Unregulated Landfill Sites Certificate of Authorisation Register published by the EPA.
Obj. 6: Water Protect water quality and the water resource from waste activities.	No deterioration in water status attributable to waste. Remediate high risk Class A unregulated landfill sites (1977 – 1996) and pre-historic unregulated sites (pre 1977) Class A sites) in accordance with the plan agreed in the EPA authorisation over the life of the plan.	Status of water bodies as reported by the EPA. Number of authorisations granted for sites to be remediated. Number of authorised sites remediated in the region.	Water quality in Ireland report, EPA. Historic Unregulated Landfill Sites Register held by Local Authorities. Historic Unregulated Landfill Sites Certificate of Authorisation Register published by the EPA.
Obj. 7: Air Quality (AQ) Minimise emissions of pollutants to air associated with waste management.	Reduce exceedances of emission limits to air from waste licensed facilities. Reduction in uncontrolled burning/disposal of waste.	Number of exceedances relating to air quality and noise at waste licensed facilities. Quantity of unmanaged waste.	Focus on Environmental Enforcement Report in Ireland, covering a three year period, published every three years, EPA. RMCEI plans. Local authority, Lead Authorities for waste enforcement. Waste statistics data from local authorities, private waste collectors, Lead Authority for waste enforcement.
Obj. 8: Climatic Factors (CF) Minimise contribution to climate change by reducing emissions of greenhouse gases associated with the prevention and management of wastes and adapt to the potential effects of climate change through	Achieve 1% reduction per annum in the quantity of household waste generated per capita over the plan period. Achieve the performance target of <i>preparing for reuse</i> and recycling rate of 50% of municipal	Quantity of household waste generated per capita (measured nationally). % municipal waste recycled	Waste statistics data from Local authorities, private waste collectors, Lead authority for waste enforcement National Waste Bulletin, published

Strategic Objective	Target	Indicator	Sources & Responsibilities
appropriate siting of waste infrastructure.	wastes by 2020. Reduce to 0% the direct disposal of residual municipal waste to landfill (from 2016 onwards). No new waste management infrastructure sited in areas at risk of significant flooding.	(measured nationally). Quantity of residual kerbside household waste sent for disposal. Number of strategic flood risk assessments completed for waste related infrastructure within the region.	annually, EPA. Strategic Flood Risk Assessment Reports, local authorities.
Obj. 9: Material Assets (MA_1) Support sustainable waste management activities without conflicting with environmental protection objectives.	Prepare siting guidelines based on the siting criteria laid down in the plan within one year of plan adoption to assist in the sustainable delivery of necessary waste management infrastructure.	Application of siting guidelines through the planning process.	Authorisation of locations in planning application files, Lead Authority, local authorities, DECLG, An Bord Pleanála, EPA.
Obj. 10: Material Assets (MA_2) Minimise transport impacts of waste management activities.	Reduce the level of exports of residual waste outside the state.	Quantity of residual waste exported annually (quantified nationally).	National Waste Bulletin, published annually, EPA.
Obj. 11: Cultural Heritage (CH) Protect places, features, buildings and landscapes of cultural, archaeological or architectural heritage from impact as a result of waste activities.	More appropriately dealt with at project (EIA) level.	More appropriately dealt with at project level.	Record of Monuments & Places, Department of the Arts, Heritage and the Gaeltacht (DAHG) Sites and Monuments Record (DAHG). The Archaeological Survey monitoring programme, Ireland Buildings at Risk Register, Heritage

Strategic Objective	Target	Indicator	Sources & Responsibilities
			Council Ireland.
Obj. 12: Landscape (LandS) Protect and maintain the national landscape character.	More appropriately dealt with at project level.	More appropriately dealt with at project level.	Local authorities.
Obj. 13: Social (Soc) Promote sustainable management of waste at an individual, community, regional and national level.	Achieve 1% reduction per annum in the quantity of household waste generated per capita over the plan period. Achieve the performance target of <i>preparing for reuse</i> and recycling rate of 50% of municipal wastes by 2020. Reduce to 0% the direct disposal of residual municipal waste to landfill (from 2016 onwards).	Quantity of household waste generated per capita (measured nationally). % municipal waste recycled (measured nationally). Quantity of residual kerbside household waste sent for disposal.	Waste statistics data from local authorities, private waste collectors, Lead Authority for waste enforcement. National Waste Bulletin, published annually, EPA.

8 ADDENDUM TO ENVIRONMENTAL REPORT

8.1 INTRODUCTION

This is the addendum to the Environmental Report for the Southern Region Waste Management Plan. This chapter serves two purposes: a) to provide clarification and/or additional information following comments in the submissions received during the consultation period on the draft RWMP and Environmental Report; and b) to identify where the Environmental Report has been updated following consideration of comments received in submission during the public consultation period. It should be noted that this document supplements and should be read in conjunction with the original Environmental Report.

The clarifications and additional information contained herein (shown in *italicised blue text*) have been provided in order to increase the usefulness of the document for the public and decision makers. However, the amendments proposed are not of such an extent that changes to the content or outcome of the assessment contained within the Environmental Report will be required.

8.2 AMENDMENTS BY CHAPTER

8.2.1 Non-technical Summary

Table 3 has been amended to include *the Marine Strategy Framework Directive (2008/56/EC)* under the European entries.

Additional information is provided in Table 4, Soils, Geology and Hydrogeology regarding Geological Heritage Areas: *There are 480 geological heritage areas within the region. This includes both county geological sites and those proposed sites of geological interest.*

Strategic Environmental Objectives in Box 1 have been amended as follows: **Obj. 1 Biodiversity Flora and Fauna:** Preserve, protect, maintain *and, where appropriate restore*, the terrestrial, aquatic and soil biodiversity, particularly EU and nationally designated sites and protected species.

8.2.2 Chapter 4

It is recognised that Ireland shares a land boundary with Northern Ireland and as waste movements include those between the two jurisdictions **the following additional information is provided in Table 4.1 by way of clarification:**

National (Northern Ireland): Northern Ireland Waste Management Strategy, Delivering Resource Efficiency (2013)

Regional (Northern Ireland): North West Region Group Waste Management Plan 2013–2020; and SWaMP2008 Waste Management Plan 2013–2020

Table 4.2 has been amended to include *the Marine Strategy Framework Directive (2008/56/EC)* under the European entries.

The following text and figure are included at the end of Chapter 4:

Within the broader environmental planning framework the key legislation relates to Directive 85/337/EEC on the Assessment of the Effects of Certain Public and Private Projects on the Environment, as amended (also known as the EIA Directive) and Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the SEA Directive) The fundamental purpose of both the EIA and SEA Directives is to protect the environment and the quality of life.

The EIA Directive has been the key instrument of environmental integration for the EU, covering a wide range of projects and ensuring they are environmentally sustainable. Article 2(1) of the Directive states that, before development consent is given, certain public and private projects likely to have significant environmental effects by virtue, inter alia, of their nature, size or location are subject to a requirement for development consent and an EIA. The SEA Directive is newer legislation which was developed to ensure that the environmental consequences of plans and programmes are assessed both during their preparation and prior to adoption. As such, it is a natural precursor to the project-level assessments driven by the EIA legislation.

*The two processes are complementary, albeit with a focus of SEA on plans and programmes at a more strategic and policy-driven level while EIA is focused at the project level (including a range of development consent processes). Although often separated temporally, the processes offer opportunities for coordination and integration to ensure the best outcome possible for planning and design processes. This has been explored for biodiversity in recent EPA research on Integrated Biodiversity Impact Assessment³. **Figure 4.1** outlines the tiering process with regard to SEA, EIA and AA.*



Figure 4.1: Relationship between AA, SEA and EIA Processes

³ Integrated Biodiversity Impact Assessment – Streamline AA, SEA and EIA processes: Practitioner’s Manual, EPA 2013.

8.2.3 Chapter 5

The following text is included at the start of Section 5.2.1, Biodiversity, Flora and Fauna:

Ireland has designated sites and species of conservation value and/or concern in an effort to protect its biodiversity resource. There are six types of designations considered for the purposes of the RWMP: Special Areas of Conservation, Special Protection Areas, Ramsar Sites, Natural Heritage Areas, [Refuges for Fauna and National Nature Reserves](#). There are over 2000 of these sites nationally with 741 contained within the Southern Region. This includes such well known sites as the Comeragh Mountains, Blackwater River, Killarney National Park, [Lady's Island](#), Cliffs of Moher, River Shannon and River Fergus Estuaries, Maghera Mountain Bogs and Lough Derg.

In addition to habitats and species afforded protection by EU legislation, national legislation also provides protection for other species and habitats. The Wildlife Act 1976 as amended by the Wildlife (Amendment) Act 2000 represents the main piece of national biodiversity legislation in Ireland. The Act and its amendment provide for designation and protection of Natural Heritage Areas (NHAs), the basic designation for wildlife in Ireland. The main objectives of the Wildlife (Amendment Act) 2000 are to: provide a mechanism to give statutory protection to these NHAs while improving circumstances to enhance the conservation of wildlife species and their habitats. The amendment act also broadened the scope of the Wildlife Acts to include most species, including the majority of fish and aquatic invertebrate species which were excluded from the 1976 Act.

Section 21 of the Wildlife Act 1976 provides for the protection of specific species of flora, which is achieved by Order of the Minister. The current list of plant species protected by Section 21 is set out in the Flora (Protection) Order, 1999, which supersedes orders made in 1980 and 1987. This order makes it illegal to cut, uproot or damage the listed species in any way, or to offer them for sale. This prohibition extends to the taking or sale of seed. In addition, it is illegal to alter, damage or interfere in any way with their habitats. This protection applies wherever the plants are found and is not confined to sites designated for nature conservation.

The European Communities (Birds and Natural Habitats) Regulations 2011 are comprehensive regulations which consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010, as well as addressing transposition failures identified in the CJEU judgments. The regulations apply to flora, fauna and habitats, with a particular emphasis on strengthening the protection of birds.

The following text is included at the start of Section 5.2.3, Soils, Geology and Hydrogeology:

The Geological Survey of Ireland (GSI), in partnership with NPWS (the National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht), is in the process of identifying and selecting important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). County Geological Sites (CGS), as adopted under the National Heritage Plan, include additional sites that may also be of national importance but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by GSI are categorised as CGS pending any further NHA designation by NPWS. There are 480 Geological Heritage Areas within the region. This includes both county geological sites and those proposed sites of geological interest.

Table 5.21 in **Section 5.2.7**, Cultural Heritage has been updated as follows:

Table 5.21 Number of Listed/ Designated Cultural Heritage Resources

	<i>Total SMR*</i>	<i>Redundant Records*</i>	<i>Monuments Records*</i>	<i>Total RMP*</i>	NIAH	UNESCO
Carlow	1,924	133	1,791	1,486	305	–
Clare	8,613	669	7,944	7,187	473	–
Cork	19,618	715	18,903	16,952	9,224	–
Kerry	14,747	1,180	13,567	12,396	873	1
Kilkenny	5,261	408	4,853	3,612	2,124	–
Limerick	8,125	311	7,814	7,099	3,189	–
Tipperary North	3,920	244	3,676	3,135	870	–
Tipperary South	5,441	265	5,176	4,627	1,486	–
Waterford	3,766	392	3,374	2,545	2,834	–
Wexford	4,011	344	3,667	2,834	2,855	–

* National Monuments Summary, downloaded 31/03/15

8.2.4 Chapter 6

Obj. 1: Biodiversity Flora and Fauna in Table 6.1 is updated as follows:

Preserve, protect, maintain *and, where appropriate, restore* the terrestrial, aquatic and soil biodiversity, particularly EU and nationally designated sites and protected species.

8.2.5 Chapter 9

Obj. 1: Biodiversity Flora and Fauna in Table 9.1 is updated as follows:

- Preserve, protect, maintain *and, where appropriate, restore* the terrestrial, aquatic and soil biodiversity, particularly EU and nationally designated sites and protected species.

The source and responsibility for Obj. 11: Cultural Heritage in Table 9.1 is updated to include:

- *Sites and Monuments Record (Department of Arts, Heritage and the Gaeltacht)*

APPENDIX A

Screening of Proposed Changes to Southern Region Waste Management Plan

SCREENING OF SIGNIFICANT EFFECTS RESULTING FROM PROPOSED AMENDMENTS TO THE DRAFT PLAN

The draft regional waste management plan (RWMP) and accompanying Environmental Reports and NIR were put on public display from 18/11/14 to 30/01/15. All submissions received were reviewed and amendments to the draft RWMP have been proposed. This document has been prepared to screen the proposed changes to the draft RWMP for potential significant environmental effects in accordance with both the SEA Directive (2001/42/EC) and the Habitats Directive (92/43/EEC) as transposed into Irish law.

The text in black is the text as contained in the draft RWMP and is not changing. The text highlighted in **yellow** is proposed as amending/new text to the draft plan. ~~Strike-through~~ text is proposed for deletion. Responses with regard to the environmental consequences of the changes are shown in *italics* in column 3 of the assessment tables.

CHANGES TO OVERALL PERFORMANCE TARGETS (CHAPTER 5)

RWMP Reference	Proposed Change	SEA/AA Screening
Target 2	<p>Wording from draft plan was – Preparing for Reuse and Recycling Rate of 50% of Municipal Waste by 2020.</p> <p>Revised to Achieve a recycling rate of 50% of managed municipal waste by 2020.</p>	<p><i>The proposed amendment represents a clarification on the proposed target. It is anticipated that this change will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Target 3	<p>Plan target wording remains the same, new footnote has been added as follows:</p> <p>Unprocessed residual municipal waste is residual waste collected at kerbside or deposited at landfills/CA sites/transfer stations that has not undergone a mechanical sort.</p>	<p><i>The proposed amendment represents a clarification. It is anticipated that this change will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>

CHANGES TO STRATEGIC OBJECTIVES (CHAPTER 5)

RWMP Reference	Proposed Change	SEA/AA Screening
Protection	<p>Apply the relevant environmental and planning legislation to waste activities in order to protect and reduce impacts on the environment, in particular Natura 2000 European Sites and human health from the adverse impact against adverse impacts of waste generated.</p>	<p><i>The proposed amendment represents a clarification. It is anticipated that this change will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>

PROPOSED INFRASTRUCTURE POLICY CHANGES (CHAPTER 16)

RWMP Reference	Proposed Change	SEA / AA Screening
E1	Alter E1 as follows: Future authorisations by the local authorities, the EPA and An Bord Pleanála of pre-treatment capacity must take account of the authorised and available capacity in the market while being satisfied the type of processing activity being proposed meets the requirements of policy E2. prior to making decisions on additional capacity while being satisfied the type of processing activity being proposed	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E2	The future authorisation of pre-treatment activities by local authorities over the plan period will be contingent on the operator demonstrating that the treatment is necessary and the proposed activities will improve the quality and add value to the output materials generated at the site.	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E3B	The plan supports the development by the private sector of public bring infrastructure (e.g. civic amenity facilities, bring banks) subject to appropriate statutory approvals and in line with appropriate environmental protection criteria.	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E6	The local authorities will may require waste developers seeking a waste facility permit to develop a Class 10 waste treatment activity, as defined by the Third Schedule: Part I of the Waste Management (Facility Permit and Registration) Regulations 2007 (as amended), to provide bring facilities for the acceptance of non-hazardous and hazardous wastes from members of the public and businesses.	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E8	The waste plan supports the development of disposal capacity for the treatment of hazardous and non-recoverable wastes at existing landfill facilities in the region subject to the appropriate statutory approvals being granted approved in line with the appropriate environmental protection siting criteria.	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report. The requirement to remain in line with environmental protection criteria is noted.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E9a	Split E9 into two sub-actions as follows: E9A: The local authorities anticipate disposal capacity for non-hazardous processed municipal residual wastes will be required over the plan period but there is no need for additional disposal facilities to be brought on stream during the plan period. The on-going availability of disposal facilities for non-hazardous municipal residual wastes	<p><i>The proposed amendment represents a clarification. It is anticipated that this change will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>

RWMP Reference	Proposed Change	SEA / AA Screening
	in the region will be required during the plan period. The local authorities consider there is no need to provide additional disposal facilities for residual wastes over and above the existing authorised (i.e. operational, inactive or uncommenced) facilities in place.	
E9b	<p>E9B: New</p> <p>The waste plan supports the need for on-going disposal capacity to be developed for on-site generated non-hazardous/hazardous industrial waste over the plan period.</p>	<p><i>The proposed amendment represents a clarification on E9a in relation to industries who dispose of process wastes on-site. The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E10	<p>The waste plan recognises the need for on-going disposal capacity to be available in response to events which pose a risk to the environment and/or health of humans and livestock. The local authorities of each region will monitor available contingent capacity annually.</p>	<p><i>The proposed amendment represents a further clarification on E9a. The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E11	<p>Add the following text to E11: The plan supports the consideration of appropriate alternative future land future land uses consideration of all at authorised inactive landfills (un-commenced, permanently closed, or temporarily closed) permanently or temporarily closed landfills and landfills not yet opened with the potential to develop alternative activities subject to amendments to existing approvals being put in place. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure protection and preservation of the Natura 2000 Network.</p> <p>Revised wording for last bullet:</p> <ul style="list-style-type: none"> • Waste treatment activities including pre-treatment, thermal recovery, biological treatment, reprocessing or preparing for reuse; • On-site temporary storage of waste and materials; • Co-location of utility services such as wind farms or other energy generating activities; • Development of public and recreational amenities; • Co-locating recycling/reuse waste 	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report. The requirement for a feasibility study in relation to this policy is still a feature of the plan and will be supported by the environmental protection criteria included at Section 16.5 of the plan.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>

RWMP Reference	Proposed Change	SEA / AA Screening
	enterprises on site; <ul style="list-style-type: none"> • Resource mining; and • Contingency capacity for crisis events such as risks to the environment and to the health of humans and livestock. 	
E13	Reword E13 to state: Future Authorisations by the local authorities, the EPA and An Bord Pleanála must take account of the scale and availability of existing back filling capacity.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on Natura 2000 sites are anticipated as a result of this proposed amendment.</i>
E14	No change but are seeking advice on whether large scale remediation sites should be replaced with large scale restoration sites . This change has been agreed.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
E15a	The waste plan supports the development of up to 300,000 tonnes of additional thermal recovery capacity of non-hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market and the State's self-sufficiency requirements for the recovery of municipal waste are met. This capacity is a national treatment need and is not specific to the region SR . The extent of capacity determined reflects the predicted needs of the residual waste market to 2030 at the time of preparing the waste plan. Authorisation above this threshold will only be granted accepted if the applicant demonstrates a justifies able and verifies able the need for the capacity which and the authorities are satisfied it complies with in line with national and regional waste policies and does not pose no a risk to future recycling targets . All proposed sites for thermal recovery must comply with the siting criteria set out in the plan.	<i>The proposed amendment represents more transparent guidance for proposals exceeding the predicted need for 300,000 tonnes of additional capacity to 2030.</i> <i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i>
E15B New policy (wasn't in the draft)	The waste plan supports the need for thermal recovery capacity to be developed specifically for the on-site treatment of industrial process wastes and where justifiable the treatment of such wastes at merchant thermal recovery facilities .	<i>The proposed amendment represents a clarification on E15a in relation to specifically on-site treatment of industrial processes which may require capacity. The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>

RWMP Reference	Proposed Change	SEA / AA Screening
E16	The waste plan supports the development of up to 50,000 tonnes of additional thermal recovery capacity for the treatment of hazardous wastes nationally to ensure there is adequate active and competitive treatment in the market to facilitate self-sufficiency needs where it is technically, economically and environmentally feasible. This capacity is a national treatment need and is not specific to the region. All proposed sites for thermal recovery must comply with the siting environmental protection criteria set out in the plan.	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E17	The waste plan supports the development in the region of at least 40,000 tonnes of additional biological treatment capacity for the treatment of bio-wastes (food waste and green waste) primarily from the region to ensure there is adequate active and competitive treatment in the market. The development of such treatment facilities needs to comply with the relevant environmental protection siting criteria in the plan.	<p><i>The proposed amendment seeks to place a lower limit on additional capacity in terms of treatment of bio-wastes (food waste and green waste). As noted in the environmental report, it is anticipated that emissions from any such facilities will be controlled as part of the licensing regime for such a facility therefore significant negative impacts are not expected, subject to appropriate siting of facilities in the first instance. The environmental protection criteria will be important in avoiding impacts.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E18	The waste plan supports the development of biological treatment capacity in the region, in particular anaerobic digestion, to primarily treat suitable agri-wastes and other organic wastes including industrial organic waste . The development of such treatment facilities needs to comply with the relevant environmental protection siting criteria in the plan.	<p><i>As noted in the environmental report, overall biological treatment is considered to have a positive impact as it reduces the amount of waste requiring thermal treatment and/or disposal. In addition material recovery can result in a clean end product with low contamination levels, which can be used as a soil conditioner. The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E19	The waste plan supports the development of indigenous reprocessing and recycling capacity for the treatment of non-hazardous and hazardous wastes where technically, economically and environmentally practicable. The relevant environmental protection criteria for the planning and development of such activities need to be applied.	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
E21	The local authorities will review the approach to authorising waste treatment facilities requiring a waste facility permit or certificate	<i>The proposed amendment represents more transparent guidance on the objective of the measure. The proposed amendment will not</i>

RWMP Reference	Proposed Change	SEA / AA Screening
	of registration having regard to the need to achieve consistency of approach The focus will be on improving correlation between planning approval and operational capacity.	<i>result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
E22	Split E22 into two sub-actions as follows: E22A: The plan supports the primacy of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
E22	<u>E22B:</u> The plan also supports the use of authorised civic amenity facilities and bring centres as part of the integrated collection system.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
E24	The plan supports the appropriate management of international catering waste ICW under the Animal By-products Regulations (EC) No. 1069/2009.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
E25	The plan supports the improvement of existing PRIs and the development of new PRIs or similar industrial/voluntary schemes for specific waste streams including but not limited to human and farm chemicals and medicines, paints, newspapers and magazines and bulky waste.	<i>The proposed amendment broadens the proposal to include a wider scope in terms of sectors which can become involved in PRI and similar schemes. Such schemes have an overall positive impact. The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>

CHANGES TO POLICY ACTIONS (CHAPTER 19)

RWMP Reference	Proposed Change	SEA / AA Screening
Section 19.2, Policy Action A.1.1	Revise text of actions as follows: Move waste further up the hierarchy by eliminating the direct disposal of unprocessed residual municipal waste to landfill (footnote reference ECJ 323/13)	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.2, Policy Action A.3.1	Add text to target: Prepare annual report and disseminate information.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.2, Policy Action A.4.1	Establish, and maintain and publish capacity database	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.3, Policy Action B.1.1	Appoint, where the role does not exist, or retain the role of the local authority Environmental Awareness Officers (EOs) on a whole time equivalent basis to work on activities including the implementation of the waste plan on a local and regional basis.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.3, Policy Action B.1.2	Original action deleted as it is covered under action D.2.2	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.3, Policy Action B.1.3	Ensure an on-going financial allocation is made in the local authority annual budgets to cover expenditure on waste prevention related activities over and above staff costs and any grant aid. Also alter target as follows: A minimum of €0.15/inhabitant to be spent on local prevention projects and to be reviewed annually.	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.3, Policy Action B.2.3	Maintain the implementation of effective local prevention, awareness and education campaigns targeting households, communities, schools and businesses (deleted previous text in brackets which was "such as green schools, home composting programmes, green business initiatives, reuse cafes etc")	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>

RWMP Reference	Proposed Change	SEA / AA Screening
	New target wording: Improve waste management practices through behavioural change	
Section 19.3, Policy Action B.2.4	Targets Reduce the quantity of waste generated at local authority head office by 10% over the baseline year (2015) during the plan period Indicator % reduction over baseline year and/or % reduction per employee	<i>The proposed amendment is a minor clarification and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.3, Policy Action B.3.2	Target Engage with the EPA at least 3 times per annum on prevention issues	<i>The proposed amendment provides clarity in relation to the expectation for engagement and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.3, Policy B4	Harmonise prevention activities in the region to link with the national hazardous management plan, producer responsibility operations—operators and other related programmes (such as litter, sludge, water, etc.).	<i>The proposed amendment is a minor wording revision and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.3, Policy Action B.4.2	Alter Lead authority entry as follows: EPA, Irish Water, DECLG, Local Authorities, Compliance Schemes PROs	<i>The proposed amendment is a minor wording revision and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.4, Policy Action C.1.2.	Review the operation of CAS sites to facilitate the segregation of materials for reuse at local authority controlled civic amenity sites (WEEE will be considered subject to discussion and agreement with the compliance schemes). Review and amend (where appropriate) existing and/or condition the award of new local authority CA site contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations Target Reuse/preparing for reuse of up to 10% of non-residual waste at local authority CA sites Indicator Tonnage reused/prepared for reuse per local authority CA	<i>The proposed amendment provides greater clarity on the intention of the policy action. The intention is to support reuse/preparing for reuse by social enterprises and similar organisations and is considered to be overall positive. The proposed amendment is a minor wording revision and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>

RWMP Reference	Proposed Change	SEA / AA Screening
Section 19.4, Policy Action C.2.1	<p>Review/Introduce by laws, consistent across the region, to address the quantity and quality of recyclable waste collected and amend/replace/introduce new if appropriate.</p> <p>Review/Introduce presentation of waste by-laws, across the region, to maximise the quantity and quality of recyclable waste collected and amend/replace/introduce new if appropriate</p> <p>Alter target entry as follows: Review Existing by-laws</p> <p>Alter Indicator entry as follows: Number of by-laws reviewed/introduced</p>	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.4, Policy Action C.2.2	<p>Target</p> <p>To produce the code of practice in consultation with the EPA</p>	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.4, Policy Action C.4.2	<p>Implement a systematic engagement with local/regional local authority procurement officers and the Office of Government Procurement (OGP) to ensure the inclusion of resource efficiency criteria in contracts.</p> <p>Targets</p> <p>To meet with local/regional procurement officers and relevant staff of the OGP</p> <p>Expected Timeline: Annually from January 2016 onwards</p> <p>Indicator</p> <p>Number of meetings with procurement officers/staff of OGP</p>	<p><i>The proposed amendment includes minor clarifications within the text and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.4 New policy C5	<p>Work with and through business support agencies and the National Waste Prevention Programme to encourage businesses and industry to implement resource efficiency principles including the use of clean technologies and preventing waste at source.</p>	<p><i>This new policy action will have overall positive impacts for the environment as less materials will be required for production and processing and less waste will be generated for treatment and disposal. In addition, over the life cycle of products there will be lower emissions to air and water resulting from processing and disposal.</i></p>
Section 19.4 New policy action C.5.1	<p>Encourage SMEs (including micro-enterprises) and industry to realise the environmental and economic benefits of resource efficiency.</p>	<p><i>Similar to above, this new policy action will have overall positive impacts for the environment by encouraging a more resource efficient society in line with EU and Irish policy.</i></p>
Section 19.5 Policy Action D.2.1	<p>Establish and/or maintain funded regional waste management office and the requisite structures (including administrative, technical & communication) to implement national and regional policy.</p>	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this</i></p>

RWMP Reference	Proposed Change	SEA / AA Screening
		<i>proposed amendment.</i>
Section 19.5 Policy Action D.2.2	Change to target Ensure roles are in place or maintained .	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.5 Policy D.3	Foster links and activities with relevant stakeholders including businesses and industry groups, NGOs , and other relevant networks (including cross-bordering networks) to extend the reach of the plan.	<i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.5 Policy Action D.3.1	Change to indicator Number of partnerships and networks established, research & pilot projects undertaken Change to responsibility Lead Authority , local authorities, EPA, DECLG & all relevant network partners and stakeholders .	<i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.7, New Policy Action F.1.4	Add new policy action as follows: Allocate resources to monitor the schedule for roll out of brown bins to households in accordance with the European Union (Household Food Waste and Bio-waste) Regulations, 2013. Target: To engage with the waste industry and NWCPO to provide the requisite data to monitor adherence to the time schedule as per the regulations. Expected timeline: Timeline as per the regulations. Indicator: % of households served in scheduled agglomeration. Responsibilities: Local authorities, Lead Authority for waste enforcement and NWCPO.	<i>The policy relating to monitoring the schedule of roll out of brown bins involves a coordinated system for delivery of this stream of waste management. The policy will ensure continued focus on brown bin roll out. The continued rollout of the brown bin collection scheme to households will be a positive in terms of diverting waste from landfill and increasing the rate of composting. This will have knock-on positive impacts on the environment, particularly in relation to reducing emissions to air, soil, surface waters and groundwaters.</i> <i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.7, Policy Action F.2.1	Prepare a regional RMCEI plan to prioritise enforcement actions and activities across the region taking account of the national enforcement priorities laid down by the EPA, DECLG & Compliance Schemes Producer Responsibility Operators Responsibilities: Local authorities; Lead	<i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>

RWMP Reference	Proposed Change	SEA / AA Screening
	Authority for waste enforcement Compliance Schemes	
Section 19.7, Policy Action F.2.2	<p>Add new policy action as follows: Work in partnership with the compliance schemes and other bodies to address on-going regulatory obligations</p> <p>Target: To identify on-going issues</p> <p>Expected Timeline: On-going</p> <p>Indicator: No of meetings held</p> <p>Responsibilities: Local authorities; Lead Authority for waste enforcement, Compliance Schemes.</p>	<p><i>This Policy Action would lead to a smarter coordinated waste enforcement system that is better equipped to promote and actively ensure compliance with regulatory obligations. The proposed amendment is broadly positive and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.7, Policy Action F.2.3	<p>Maintain high level of site inspections of all existing local authority waste authorisations and ensure that these are reflected in the RMCEI.</p> <p>Responsibility: Lead Authority local authorities; Lead Authority for waste enforcement.</p>	<p><i>The proposed amendment represents a clarification on the action and associated responsibility and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.7, Policy Action F.2.4	<p>Add new policy action as follows: Audit waste arisings from non-household waste premises (commercial and similar premises) to determine compliance with relevant regulations including commercial food waste regulations as reflected in the RMCEI.</p> <p>Target: To increase the level of annual inspections.</p> <p>Expected Timeline: Ongoing.</p> <p>Indicator: No. of inspections.</p> <p>Responsibilities: Local authorities; Lead Authority for waste enforcement.</p>	<p><i>This Policy Action will directly inform understanding of baseline conditions which will inform ongoing policy decisions. This is considered a broadly positive action. The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.7, Policy Action F.3.1	<p>Alter Responsibility entry as follows: Local authorities; Lead Authority for waste enforcement.</p>	<p><i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.7, Policy Action F.3.2	<p>Target (minor edit)</p> <p>Increased investigation and prevention of unauthorised waste activities</p> <p>Expected timeline (minor edit)</p> <p>Annually</p> <p>Alter Responsibility entry as follows: Local Authorities; Lead Authority for waste</p>	<p><i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>

RWMP Reference	Proposed Change	SEA / AA Screening
	enforcement	
Section 19.7, Policy Action F.3.3	<p>Prepare action plan (subject to AA screening) to deal with the prevention and management of waste from significant unauthorised activities and waste arisings from other criminal activities. Co-ordination required between the regions.</p> <p>Target</p> <p>Prevent and address unauthorised activities in the region</p> <p>Expected Timeline</p> <p>Annually</p> <p>Indicator</p> <p>Prepare and publish the action plan</p>	<p><i>The proposed amendment includes reference to significant unauthorised activities however there is no indication of how significance will be ascertained. It is recommended that clarity is provided on this going forward however, the change will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.8, Policy Action G.2.1	<p>Each region is to rank the class A high risk historic unregulated landfill sites (1977 – 1996) and pre-historic unregulated landfill sites (pre-1977).</p>	<p><i>It is noted that this change now excludes reference to prehistoric unregulated landfill sites (pre-1977). The amended wording now more strictly represents the scope governed by EU waste legislation which post-dates 1977. This however is not to say that pre-1977 sites will not continue to be addressed by the relevant local authorities. Under Section 76 of the EPA Act, the EPA in 2007 published a Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites. This code states:</i></p> <p><i>Landfill sites operated and closed prior to 1977 are outside the general scope of this document as the Waste Framework Directive only came into force in July 1977. However, if landfill sites operated prior to 1977 are identified during the application of the Identification Methodology and it is considered that they may pose a risk to the environment or human health then the risk screening process should be applied in line with the precautionary principle and in the interest of environmental protection.</i></p> <p><i>Given this obligation is included in the statutory code of practice it can be concluded that this amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.8, Policy Action G.2.3	<p>Alter Indicator entry as follows:</p> <p>Number of applications submitted</p>	<p><i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European</i></p>

RWMP Reference	Proposed Change	SEA / AA Screening
		<i>Sites are anticipated as a result of this proposed amendment.</i>
Section 19.8, Policy Action G.3.1	Prepare siting guidelines for waste facilities and review general environmental protection siting criteria as set down in the waste plan	<p><i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.8, Policy Action G.3.2	<p>The following action was in the draft and has been replaced:</p> <p>Action</p> <p>Prepare an environmental checklist for planning to aid decision making.</p> <p>Target</p> <p>Complete the checklist</p> <p>Timeline</p> <p>End of 2015</p> <p>N/A</p> <p>End of 2015</p> <p>Responsibility</p> <p>Lead authority, local authorities, DECLG, An Bord Pleanála, EPA</p> <p>New G.3.2</p> <p>Action – Undertake a risk assessment of all waste disposal sites in coastal and estuarine areas to identify those at risk from coastal erosion in the short, medium and long terms</p> <p>Targets – To ensure climate proofing measures are implemented at sites identified as being of high risk to prevent impacts on the environment</p> <p>Expected timeline – Lifetime of the plan</p> <p>Indicator – n/a</p> <p>Responsibility – Lead authority, local authorities, DECLG, An Bord Pleanála, EPA</p>	<p><i>The addition of this policy action will result in direct positive impacts in relation to all environmental receptors. The action is acknowledging the need to include climate proofing of waste management activities with this action focusing on historical disposal scenarios which could lead to further environmental damage as a result of exposure from erosion in the future.</i></p>
Section 19.8, Policy Action G.4.1	<p>Expected timeline (minor)</p> <p>End 2015 2016</p>	<p><i>The proposed amendment represents a minor clarification to text and will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i></p>
Section 19.8, Policy Action G.4.2	Design and implement a programme to regulate, enforce and communicate in areas with low collection coverage, including the negative health and environmental impacts of burning/illegal dumping.	<p><i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i></p> <p><i>No significant negative impacts on European Sites are anticipated as a result of this</i></p>

RWMP Reference	Proposed Change	SEA / AA Screening
		<i>proposed amendment.</i>
Section 19.8, Policy Action G.4.3	Engage with authorised waste collectors to design solutions, such as public drop off areas to serve communities/areas of low collection coverage and implement the solutions Indicator Number of households with a kerbside collection service, Quantity of unmanaged waste Tonnage of waste collected from public drop off points	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.8 New policy G.5	Ensure that the implementation of the regional waste management plan does not prevent achievement of the conservation objectives of sites afforded protection under the EU Habitats and Birds Directives.	<i>This objective has been added to strengthen the commitment already in the plan in relation to protection of the Natura 2000 Network. This will result in overall positive impacts for biodiversity, flora and fauna, soils and water. Indirect benefits will also be achieved for landscape, population and human health.</i>
Section 19.7 New policy action G.5.1	<i>As part of the statutory review process under the relevant waste regulations, the local authorities will examine relevant waste authorisations requiring local authority consent to determine if AA screening is required.</i> <i>In addition the local authorities will prioritise reviews of authorisations for AA screening, in advance of any scheduled review, based on the proximity to or potential pathway of the permit holder to European sites.</i> Target <i>To ensure all existing development consents relating to waste activities and infrastructure have been screened for AA and ensure NIS is provided by the applicant/operator where considered appropriate.</i> Timeline <i>Ongoing</i> Indicator <i>% of AA Screening completed</i> Responsibility <i>For AA Screening: Local authorities; Lead Authority for waste enforcement, applicant/operator</i> <i>For NIS: Applicant/Operator</i>	<i>This objective has been added to strengthen the commitment in the plan in relation to protection of the Natura 2000 Network. This will result in overall positive impacts for biodiversity, flora and fauna, soils and water. Indirect benefits will also be achieved for landscape, population and human health. It is noted that the outcome of AA screenings for existing activities may result in negative impacts in relation to material assets.</i>
Section 19.8,	Investigate the opportunity to establish and expand management schemes for particular	<i>The proposed amendment provides further clarity on the scope of the action. The</i>

RWMP Reference	Proposed Change	SEA / AA Screening
H.2 Policy	Hazardous and Non-Hazardous waste streams including (but not limited to) paints, medicines, mattresses, other bulky wastes, agricultural and horticultural chemicals and waste oils (where technically, environmentally, and economically practicable).	<i>proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.8, Policy Action H.2.2	Examine the possibility of expanding existing reuse schemes in place throughout the region for bulky or hazardous waste streams (such as mattresses and paints)	<i>The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>
Section 19.8, Policy Action H.3.2	Ensure that all local authority waste management websites provide up to date information on locations for the collection of hazardous wastes for both households, farms and small businesses	<i>The inclusion of farms in this education and awareness initiative is considered positive. The proposed amendment will not result in any changes to assessment included in the Environmental Report.</i> <i>No significant negative impacts on European Sites are anticipated as a result of this proposed amendment.</i>