

CEWEP Ireland response to Draft Waste Facility Siting Guidelines

Confederation of European Waste-to-Energy Plants (CEWEP) Ireland is pleased to respond to the Draft Waste Facility Siting Guidelines.

CEWEP is the umbrella association of the owners / operators of Waste-to-Energy Plants, representing approximately 400 Waste-to-Energy Plants from 18 European countries. Our members make up 86% of the Waste-to-Energy capacity in Europe.

CEWEP Ireland is the Irish branch of CEWEP Europe and has two members. Indaver operates the Meath Waste-to-Energy facility and is proposing to develop similar facilities in Belfast and Cork. Covanta is currently constructing the Dublin Waste-to-Energy facility. By 2020 it is anticipated that members will have a total treatment capacity of over 1,070,000 tonnes per annum residual waste and export more than 90MW electricity and/or heat.

For the purposes of this consultation, our comments focus on the general siting criteria and siting guidelines with regards to thermal recovery facilities. CEWEP Ireland welcomes the introduction of siting guidelines as it will provide a uniform policy for all involved in the decision-making process when considering a new facility, including local residents, their representatives, waste management organisations, project developers and An Bord Pleanála. It will assist in ensuring balanced regional progress in the development of future waste infrastructure.

1. General siting criteria

CEWEP Ireland agrees with the inclusion of environmental considerations, economic considerations, planning considerations, social, community and political considerations, designation that may preclude/curtail development and setback distances in the general siting criteria for waste facility development.

a. **Environmental considerations**

The inclusion of environmental and health criteria in siting guidelines ensures coherence with overarching EU guidance and obligations, and will prevent siting waste infrastructure or related infrastructure in unsuitable locations (i.e. for visual amenity, geological heritage, cultural heritage value and other environmental protection reason). Avoiding the development of waste management infrastructure in flood risk areas should be adhered to, unless a robust engineering solution can prevent flood risk. The World Health Organisation's site selection guidelines point to justifiable exceptions to certain criteria for reasons of public interest in order to prevent the ruling out of needed facilities for "inconsequential reasons". In cases where there are flood risks, the WHO guidelines point to not ruling out the development in cases where there are engineering possibilities.¹

¹ World Health Organisation, *Site Selection for new hazardous waste management facilities*, 1993.

b. Economic considerations

The proposal to improve the efficiency of waste processing through co-location with other infrastructure, such as energy, industrial, water etc. has the ability to reduce costs, improve economies of scale and assist Ireland in meeting mandated EU obligations. One such example is the potential to develop industrial district heating networks at waste-to-energy facilities. It would not only provide secure, cost-effective supplies for industrial consumers. It will also assist Ireland in meeting EU greenhouse gas emissions reduction targets and Renewable Energy targets.

However, it is vitally important that specific considerations are not looked at in isolation. The WHO guidelines caution against applying too stringent criteria and needlessly excluding large areas : “Combinations of screening criteria that are reasonable on an individual basis can guide development into certain areas and exclude others that are equally satisfactory, and indicate illogical choice of location and technology”. The WHO guidelines concludes that neither screening nor exclusionary criteria can replace a thorough site investigation.² It may not be environmentally or economically prudent to exclude certain sites on the basis of singular considerations, or in the public interest.

Room for future expansion of the proposed facility could include the expansion of other waste activities that would further develop an integrated waste management facility for the wider community.

c. Planning considerations

The proposed planning considerations should provide for the need to achieve balanced regional waste infrastructure development. Aligning siting considerations with the regional waste management plans will assist in ensuring that the whole population is adequately serviced by various facility types and should enable balanced regional development.

The preference to develop facilities in proximity to customers, such as local industry and energy users (i.e. with consistent levels of heat requirements), will not only benefit the consumers directly, but also assist in Ireland in meeting EU mandated obligations. However, in order to avoid any misinterpretation, rather than using term “local industry” it would be helpful to use the term “industry” or “industry in proximity to the facility”.

Waste infrastructure should be informed by present and forecasted population density data in order to optimally locate facilities. The population figures and projections used in various Development Plans should be regularly updated as official census statistics become available. This data allows will provide a valuable insight into the movement and preferences of people nationally and at a local level.

² World Health Organisation, *Site Selection for new hazardous waste management facilities*, 1993.

d. Social, community and political considerations

These considerations, while less technical in nature, are nonetheless crucial in ensuring environmental social equity in assessing the cumulative impact of existing and proposed developments. The draft guidelines suggest that consideration should be given to anticipated growth and development near the proposed facility. In terms of fairness and equity, it will be important to reference a uniform source to inform these decisions.

e. Setback distances

The document provides guidelines on preferred distances from site activities to residents and businesses. In line with the EPA's *Guidelines on the information to be contained in Environmental Impact Statements* and its interpretation of sensitive receptors, we take this to mean neighbouring landowners, local communities or other parties likely to be affected are usually identified.³ However, as noted in the section below on thermal recovery facilities, the guidelines should provide more specific detailed information on the boundary.

f. Designations that may preclude or curtail development

The proposal to mandate, in certain cases, further special consideration in coming to a decision on whether to specifically exclude certain designated sites (i.e. Special Areas of Conservation) brings the policy in line with EU obligations.

2. Thermal recovery facilities

Overall, current siting considerations for thermal recovery facilities, such as waste to energy plants, have regard to a number of criteria, including:

- General Planning and Environmental Considerations
- Current Land Use
- End-Market Use
- Proximity to Residential Areas
- Road Access
- Traffic

It is important to point out the use of a Traffic Management Plan could, for example, enable the use of existing road capacity (such as high-quality roads easily accessible to the national road network).

The scale, electrical and heat output will have an important bearing on Ireland's ability to effectively manage and garner value from waste streams, and this in effect reinforces the pivotal nature of the policy need (i.e. regional waste management plan policy and actions, and the interactions between the regional waste management plans). The development of waste-to-energy capacity will allow Ireland to become more self-sufficient in waste treatment, reducing exports of hazardous waste and non-hazardous residual and municipal waste. This is a key objective of national waste policy and

³ EPA, *Guidelines on the information to be contained in environmental impact statements*, 2003.

plans, developed in line with statutory obligations and incorporating requirements of the Waste Framework Directive (2008/98/EC).

The recommended setback distance of 250 metres between the nearest neighbour (residential or business) for facilities with a treatment capacity of 100,000 tonnes or more is proportionate, as is the 100 metres distance for facilities below 100,000 tonnes. However, these distances are only proportionate and workable if it applies to the plant itself rather than the outer perimeter i.e. fence. CEWEP Ireland therefore requests that the guidelines specifically mention the plant as the proposed guidelines fail to provide sufficient clarity.

Waste-to-energy facilities generate renewable electricity from the biodegradable fraction of industrial and municipal waste, thus contributing towards Ireland's renewable energy and emission reduction targets. Diversifying energy sources using an indigenous fuel at low cost to industry and consumers reinforce national and European policy objectives of energy security and energy cost competitiveness.

Where possible and if users are in proximity to the site, the development of heat networks and the export of heat to industrial facilities, hotels, hospitals serve as a cost effective and energy efficient manner for serving heat needs while also meeting Ireland's EU climate and energy targets. There are efficiencies gained as a result of maintaining one large waste-to-energy plant to cover multiple building heat demands in comparison to multiple individual boilers. Furthermore, the overall customer price for heat can be reduced as a result of cheaper sources of heat production, when compared to gas or biomass. Siting facilities in proximity to potential end users will reduce the associated installation costs of the pipe network, which means lower investment costs, and reduced operational costs through lower transmission losses.

In conclusion, CEWEP Ireland welcomes the opportunity to comment on the draft guidelines and is available to discuss the points raised in this response.