



Objection regarding the proposed extension of the Landfill facility at Drehid: PL09.PA0004

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1.0 Outline of Objection

CEWEP is making this submission as part of a nationwide campaign to highlight the impact of excess landfill capacity on the development of alternative waste management technologies, such as waste-to-energy. It is critical that any new landfill developments do not exacerbate the current oversupply in landfill capacity and continue Ireland's over reliance on landfill for waste disposal.

CEWEP acknowledges the assertion in the review of Greater Dublin Area (GDA) residual waste capacity (which accompanied application PL09.PA0004), that there may be a short-term capacity deficit in the region in the near future. However, CEWEP would caution that with numerous landfills currently in the planning or development stages for the GDA, there is significant potential for an oversupply of landfill capacity in the future. Therefore, any development of short-term capacity at Drehid must be carefully managed to reflect future developments.

CEWEP would urge that if An Bord Pleanála approves the development of this extension, it should apply conditions that ensure a constraint on total landfill capacity within the GDA and Ireland as a whole.

2.0 CEWEP

CEWEP represents over 340 waste-to-energy plants across Europe in 16 countries, treating approximately 48 million tonnes of municipal solid waste (MSW) per year. CEWEP in Ireland supports European and Irish waste policy and promotes an integrated approach to managing waste. This involves supporting the development of sustainable waste-to-energy facilities in Ireland, and banning the landfill of combustible waste.

3.0 Legal and Policy Framework

Section 32 of the Planning and Development Act 2000 requires that in making a planning decision, the planning authority should consider the proper planning and sustainable development of the area, having regard to (amongst other things) Government and Ministerial policy.

Sustainable development is generally understood to mean “development which meets the needs of the present without compromising the ability of future generations to meet their own needs” (Kramer, EC Environmental Law (2003), p.9). It is submitted that this involves finding a balance between the needs of the present, or the need for the facility, and the impacts of the development on the future, including environmental and other impacts. Therefore, it would be contrary to the principle of sustainable development to grant consent to landfill capacity that is not needed.

In addition, the planning authority must have regard to relevant policies of the Government. Irish waste policy is based on European policy, which aims to develop a recycling society by implementing higher in waste hierarchy technologies and reducing landfill reliance. Ireland must also meet ambitious targets set out under the EU Landfill Directive to reduce the amount of biodegradable waste going to landfill.

The policy statement *Changing Our Ways* set out to dramatically reduce Ireland’s reliance on landfill in favour of an integrated approach. This was highlighted as the most fundamental issue to be addressed in waste management, since a heavy reliance on landfill limited the development of an integrated approach and inhibited waste recovery and recycling. Later policy documents, including *Waste Management - Taking Stock and Moving Forward (2004)* and *National Overview of Waste Management Plans (2004)* also recognised, as a critical part of national waste policy, the necessity of eliminating reliance upon landfill.

More recently:

- The *National Strategy on Biodegradable Waste* sought to reduce Ireland’s dependence on landfill in line with EU Landfill Directive targets
- The *National Bioenergy Action Plan* and the *National Development Plan 2007 – 2013* emphasised that landfill is the least favoured option for residual waste management.
- The 2007 *Programme for Government* set an objective to reduce reliance on landfill to as low as 10% and required that those landfills provided for under regional waste management plans should be the last to be constructed for a generation

Government and EU policy therefore requires that Ireland moves away from landfill and that no new, unplanned facilities are developed, due to the impact of a heavy reliance on landfill on the development of alternatives.

Despite these policies, Ireland has made slow progress in moving away from landfill. This has caused concern over Ireland’s ability to meet its EU and targets, as highlighted in:



- The EPA's *Environment in Focus*, which warned that Ireland's waste management infrastructure is still greatly dependent on landfill and meeting targets poses a "significant challenge"
- The Economic and Social Research Institute (ESRI)'s *Medium Term Review 2008-2015*¹, which warned that without a substantial shift to recycling or large-scale use of incineration, it is unlikely that Ireland will meet its EU Landfill Diversion obligations

It is worth noting that, where there is a demonstrated short-term need, Government policy endorses the extension and expansion of activity at existing sites to avoid the development of new facilities. This was outlined in *Changing Our Ways*, which states that:

- *"There may be situations where local authorities face an imminent shortage of disposal capacity, with some situations so acute as to require action in advance of the outcome of the current strategic planning process. A commitment to the provision of new landfill facilities, in isolation from the broader issues which require to be addressed, should as far as possible be avoided. Every effort should be made to develop interim solutions which do not prejudice the outcome of longer-term strategic solutions."*
- *"Where imminent landfill capacity problems exist, action to extend the life of existing landfill facilities, rather than to provide new landfill sites, should be a priority. This can be facilitated by..... seeking access to landfill capacity available in neighbouring local authority areas"*
- *"Where a local authority determines that it has no option but to provide additional landfill capacity in advance of completion of the strategic planning process, consideration should first be given to the phased development of small scale cells, on or adjacent to existing facilities, rather than the acquisition and development of large green-field landfill sites for new landfill with a lengthy lifespan."*

The movement of waste for the rational use of infrastructure was later formalised in Circular WIR 04/05.

CEWEP supports the rational use of existing landfill sites over the development of a new landfill where a deficit arises. However, this must be carefully managed to ensure that any deficit is not overcompensated by the development of short-term capacity. For example, the landfill capacity deficit in the early 2000s was grossly overcompensated by the development of new and unplanned facilities. This resulted in over 2 million tonnes per annum (tpa) of excess capacity. Therefore, it will be important to ensure that any deficit in the GDA is not overcompensated by the development of the proposed extension at Drehid in addition to the landfill and waste-to-energy capacity already in the planning system.

¹ Fitzgerald, J. et al, *Medium-Term Review 2008-2015*, ESRI, 2008

4.0 Impact of Excess Landfill Capacity

Since 2005, CEWEP Ireland has been monitoring the development of landfill capacity in Ireland and residual waste arising. From this it has become apparent that poor coordination between regions and the development of unplanned facilities or extensions has led to a significant oversupply of landfill capacity, compared with that required for residual waste disposal.

CEWEP has estimated that there is currently 3.3 million tpa approved capacity compared with only 1.98 million tpa waste² deposited to landfill in 2006 (see Appendix A). Effectively, Ireland has 170% of the capacity required for residual waste arising. When compared with the amount of waste Ireland *is allowed* to send to landfill under the Landfill Directive, or with the targets for landfill under the *Programme for Government*, this excess is even greater.

Specifically, the Landfill Directive requires a 34% reduction in the amount of biodegradable waste currently going to landfill by 2010, with further reductions of 56% and 69% by 2013 and 2016 respectively. These targets are shown on the right hand side of Figure 1 below. Missing them could incur fines from Europe of over €100,000 per day³.

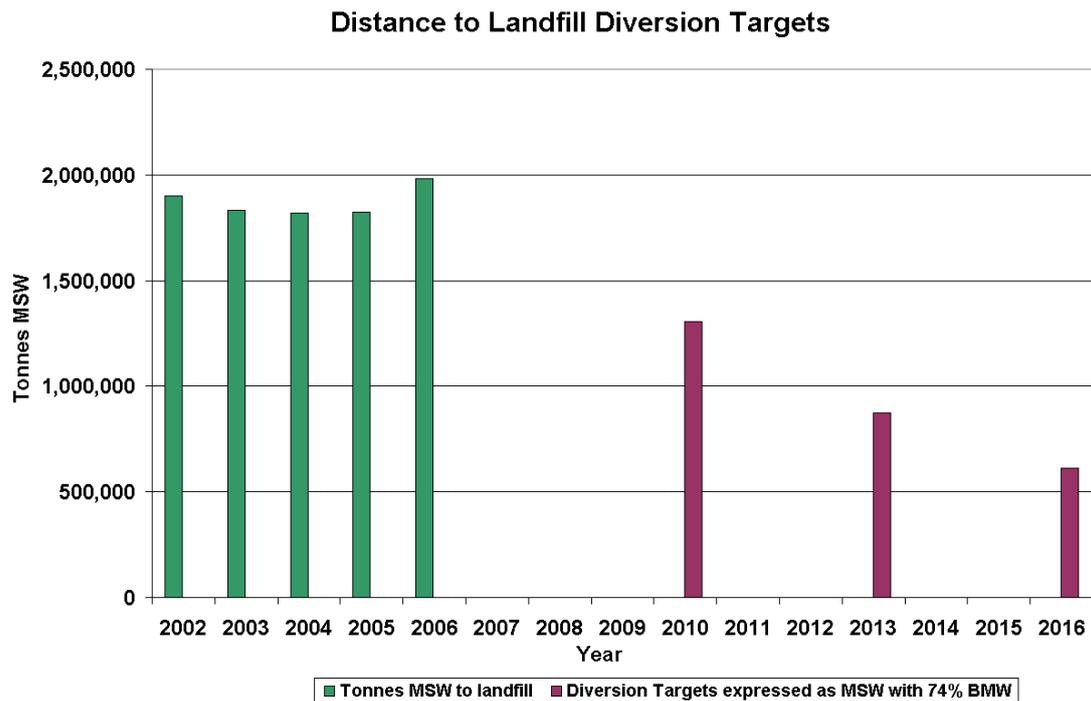


Figure 1: Landfill figures and diversion targets for Ireland⁴

However, as shown on the left hand side of Figure 1, the amount of municipal waste going to landfill has been increasing since 2004. The most recent figures show that

² EPA, *National Waste Report 2006*, 2006, available at <http://www.epa.ie>

³ Legal advice from Arthur Cox

⁴ In this figure, the Landfill Diversion targets have been calculated for MSW, based on a composition of 74% biodegradable waste as per the 2006 EPA report.

between 2005 and 2006, the amount of municipal waste going to landfill increased by 8%. The EPA in its 2006 report recognised that this was a result of a decline in landfill gate fees, which reduced the economic incentive to collect source-separated materials or to develop alternatives to landfill.

It is estimated that landfill gate fees dropped to as low as €60/t⁵ in 2006/7. Although gate fees have recently increased again, operators could drop them at any time to compete with other landfill operators and in the process, undermine alternative technologies higher in the waste hierarchy.

The presence of excess landfill will therefore continue to pose a significant risk to developers in the absence of further legislative or market drivers. This impacts the development of everything from waste prevention, reuse and recycling programmes to mechanical biological treatment (MBT) and waste-to-energy (WTE) facilities for residual waste. A continued reliance on landfill will also ensure waste management costs remain fully exposed to the volatility of landfill gate fees rather than being balanced by a range of treatment technologies.

In the context of Ireland's current over reliance on landfill, any decisions on the development of additional capacity are of a critical nature for the achievement of policy goals and the sustainable development of Ireland's waste management sector. If approval is given for landfill capacity that is in excess of Ireland's requirements, it will directly impact on Ireland's ability to meet EU and national landfill diversion targets.

5.0 Capacity in the GDA

5.1 Forecast capacity from the Drehid EIS

Appendix 1.2.1 of the proposed development's Environmental Impact Statement reviews existing and potential residual waste management capacities in the GDA. This includes the facilities listed in Table 1 below.

Table 1: Capacity in the GDA assessed in Appendix 1.2.1

Facility	Type	Region	Throughput (tpa)	Assumption
Arthurstown	Landfill	Dublin	400,000	Closing 2010
Baleally	Landfill	Dublin	450,000	Closing end 2008
Nevitt ⁶	Landfill	Dublin	500,000	Opening 2010
Poolbeg	WTE	Dublin	600,000	Opening 2012
Drehid	Landfill	Kildare	120,000	As currently permitted
Kerdiffstown ⁷	Landfill	Kildare	235,000	
KTK	Landfill	Kildare	230,000	Closing end 2008
Usk ⁸	Landfill	Kildare	200,000	Opening 2010
Ballynagran	Landfill	Wicklow	150,000	

⁵ Cre, *New Government has to make changes for composting*, Newsletter 15-August 2007, 2007, available at <http://www.cre.ie>

⁶ Does not yet have full planning permission

⁷ Not included in all scenarios of Appendix 1.2.1

⁸ Does not yet have full planning permission

Rampere	Landfill	Wicklow	50,000	Closing 2010
Carranstown	WTE	Meath	200,000	Opening 2011
Knockharley	Landfill	Meath	132,000	88,000 tpa from 2010. Closing ~ 2018

Based on these figures, the assessment (in all scenarios) finds that a short-term deficit may arise in the GDA. This deficit is used to justify the need for the facility as submitted in planning application PL09.PA0004.

For the purposes of this objection it is assumed that only capacity in the GDA, excluding facilities in the wider NE region⁹, is relevant. It is also assumed that capacity approved at Kerdiffstown would be exploited where landfill capacity becomes scarce. Therefore, scenarios illustrated in Figures 3.24 – 3.27 of Appendix 1.2.1 of the EIS are considered the most relevant.

However, these scenarios assume that the Usk landfill development will proceed whereas (as for Nevitt and Poolbeg) full planning permission has not yet been accorded. In this objection, scenarios both with and without the Usk facility will be discussed.

5.1.1 Forecast Capacity as per Appendix 1.2.1 (including Usk)

If the Nevitt landfill or the Poolbeg WTE facilities are significantly delayed, a deficit (shown in Figure 3.26 of Appendix 1.2.1) of less 50,000 tpa could arise in 2010/11 increasing to 300,000 tpa from 2013 onwards.

However, where either the Nevitt landfill (Figure 3.27) or the Poolbeg WTE plant (Figure 3.25) are developed on time or before 2013, this deficit is either minimal or is avoided entirely. Where only Nevitt is developed, no deficit is anticipated as there remains a capacity surplus of approximately 100,000 tpa at the time Nevitt is opened. Where only Poolbeg is developed, a deficit of less than 50,000 tpa is predicted for a short period in 2010/11. Following this, both scenarios show excess landfill capacity of between 300,000 tpa (where only Nevitt is developed) and 400,000 tpa (where only Poolbeg is developed) in the long term.

This demonstrates that:

- No additional capacity is required if Nevitt is opened in 2010
- Less than 50,000 tpa additional capacity will be required in 2010/11 if Poolbeg is opened in 2012
- At worst, 300,000 tpa capacity will be required from 2013 onwards if neither facilities are developed and no alternative capacity is provided in the GDA

Figure 3.24 also shows that if both Nevitt and Poolbeg are developed, there will be excess landfill capacity of 800,000 to 1,000,000 tpa from 2012 until at least 2018.

It is important to note that Poolbeg and Carranstown (as a waste-to-energy facilities¹⁰) would not contribute to excess landfill capacity, but would make a positive contribution towards Ireland’s Landfill Diversion and greenhouse gas reduction

⁹ Noted in Appendix 1.2.1 as Louth, Cavan and Monaghan

¹⁰ Which under the Waste Framework Directive is likely to be classified as recovery



targets. As they will divert waste away from landfill, the remaining landfill capacity will be in excess of the GDA's requirements. The development of additional landfill capacity in the region (i.e. the Nevitt facility) will, by contrast, further the region's and Ireland's reliance on landfill and will postpone the attainment of Ireland's landfill diversion targets.

5.1.2 Forecast capacity as per Appendix 1.2.1 (not including Usk)

If the Usk landfill were not granted planning permission, and there were delays to both Nevitt and Poolbeg, the deficit as per Figure 3.26 of Appendix 1.2.1 would amount to approximately 250,000 tpa from 2010/11 increasing to 500,000 tpa from 2013 onwards.

Where either the Nevitt landfill (Figure 3.27) or the Poolbeg WTE plant (Figure 3.25) are developed, this deficit would be reduced. Where only Nevitt is developed (in the absence of Usk), the deficit would amount to approximately 100,000 tpa at the time Nevitt is opened. Where Poolbeg is developed on time, a deficit of approximately 250,000 tpa may arise over a two year period between 2010 and 2011.

Following this, both scenarios show excess landfill capacity of between 100,000 tpa (where only Nevitt is developed) and 200,000 tpa (where only Poolbeg is developed) in the long term.

This demonstrates that, in the absence of the Usk landfill:

- A deficit of 100,000 tpa capacity would arise in 2010 if Nevitt is opened on time
- A deficit of 250,000 tpa capacity would arise in 2010 and 2011 if Poolbeg is opened in 2012
- At worst, a deficit of 500,000 tpa capacity would arise from 2013 onwards if neither facilities are developed and no alternative capacity is provided in the GDA

The figures also indicate that if both Nevitt and Poolbeg are developed, there will be excess landfill capacity of approximately 600,000 tpa from 2012 until 2018 even in the absence of the Usk landfill facility. This clearly indicates that there is too much long-term landfill capacity currently in the planning system.

5.2 Options for Managing the Deficit

The short term deficit forecast for the GDA could be managed in three ways as discussed below.

5.2.1 Absorption by regions outside the GDA

Deficits in the GDA could theoretically be absorbed by excess landfill capacity outside of the region. This does not mean that waste from the GDA would need to travel as far as available landfill capacity in, for example, Cavan. Instead, available capacity would be rationalised across each region to cater for a higher demand from the GDA.

CEWEP figures (see Appendix B) indicate that in the worst case scenario, assuming:



- the closure of Balleally and KTK landfills in the GDA
- further anticipated closures in Cork, Clare/Limerick/Kerry, Connaught and the South East (as shown in yellow in Appendix B)
- delays to the development of the Nevitt landfill

there would be a national excess capacity of 300,000 tonnes in 2010. This indicates that the rationalisation of landfill capacity could absorb the forecast deficit in the GDA until Nevitt or other capacity is developed. It also indicates that even where the Usk facility is not developed, a national excess of approximately 100,000 tonnes would still be available in 2010.

A number of further closures are anticipated by the end of 2010/11 at Arthurstown, Rampere, Powerstown, and facilities in Connaught, the North East and the Midlands. By 2012 this will be partly compensated by the development of the Carranstown WTE facility. However, without the further development of Nevitt or Poolbeg there could be a national capacity deficit of up to 240,000 tpa. In the absence of Usk this could amount to 440,000 tpa. Thus if no further capacity is developed by this stage it would not be possible to rationalise the capacity deficit in the GDA across existing facilities in other regions.

Despite the scale of the potential deficit in 2012 (in the absence of Nevitt, Poolbeg and Usk), it is critical to recognise that with the development of only one of either the Nevitt or Poolbeg facilities, the deficit would be entirely eliminated. Any further capacity developments beyond this would therefore contribute to excess landfill capacity.

5.2.2 Additional temporary capacity at an existing landfill site

Figures 3.25 and 3.27 of Appendix 1.2.1 of the EIS indicate that the proposed Drehid extension of 240,000 tpa would not be necessary where Nevitt or Poolbeg are delivered on time. However, the Drehid extension is designed to cover potential delays to the Nevitt or Poolbeg projects or to any alternative facilities. Figure 3.26 indicates that if delays to Nevitt or Poolbeg extend to 2013, a deficit of up to 300,000 tpa (or higher in the absence of Usk) may arise in the GDA. As noted above, there is unlikely to be sufficient alternative capacity elsewhere to absorb this.

However, it is questionable as to whether delays to Nevitt or Poolbeg would last for as long as 7 years (i.e. until 2016 at the earliest), the timeline proposed for the extension at Drehid. Once Nevitt and/or Poolbeg are developed there will be a significant oversupply of landfill capacity, even in the absence of Usk. It would therefore be critical to regulate any extension at Drehid to reflect new developments as they arise in order to prevent Drehid from contributing to an oversupply of landfill capacity in the GDA.

5.2.3 Temporary capacity replacing proposed long-term capacity

With the Usk Landfill

If the Nevitt landfill is developed in conjunction with the other planned facilities, there will be an oversupply of landfill capacity in the GDA (as indicated in Figure 3.24),



resulting in an oversupply of landfill capacity in Ireland of approximately 860,000 tpa (see Appendix C).

As demonstrated above, the proposed extension at Drehid could provide sufficient capacity to manage any short-term deficit in the GDA, in the absence of the Nevitt development, until the necessary alternative capacity is developed. At that stage, capacity provided at Drehid could be removed or restricted to prevent an oversupply of landfill capacity from distorting the waste market.

In the absence of the Nevitt development the amount of excess capacity available in the GDA would be moderated to “only” 400,000 tpa as indicated by Figure 3.25.

Without the Usk Landfill

Even in the absence of the Usk landfill, the development of the Nevitt facility (in addition to Poolbeg) will lead to an oversupply of capacity of about 600,000 tpa in the GDA.

The proposed extension at Drehid would provide most of the necessary capacity to manage the potential 250,000 tpa capacity deficit from 2010 to 2011 in the GDA until Poolbeg is developed. At that stage, the capacity provided by Drehid could be reviewed and rationalised where necessary.

In the absence of Nevitt and Usk, the amount of excess capacity available in the GDA would be moderated to 200,000 tpa as indicated by Figure 3.25. This excess is possibly low enough to cause an increase in landfill gate fees and, critically, a driver for the development of alternatives.

Conclusion

A temporary extension at Drehid, in the absence of Nevitt and Usk, could ensure that landfill does not continue to dominate the long-term waste market in the GDA or Ireland. This would provide the investor confidence required to usher in WTE and MBT technology, enabling Ireland to meet its Landfill Diversion targets and reduce greenhouse gas emissions from the waste sector. It would also align with Government policy, which requires that every effort be made to develop interim solutions that do not prejudice the outcome of longer-term strategic solutions.



6.0 Summary

CEWEP recognises that there could be a deficit in residual waste capacity the GDA of 50,000 tpa in 2010/11 and 300,000 from 2013¹¹ if facilities currently in the planning system are not developed in time. However, if both Nevitt and Usk were approved, and were developed in addition to the Poolbeg WTE facility (which already has full planning permission), there would be an oversupply of landfill capacity of at least 800,000 tpa in the GDA.

Given there is this considerable amount of capacity in the planning system or awaiting development, the provision of additional temporary capacity for a seven year period could disrupt the long term waste management goals for the GDA. For these reasons, CEWEP would suggest that the outcome of planning decisions for landfills at both Usk and Nevitt should be used to inform the decision to provide further temporary capacity at Drehid. Analysis has shown that sufficient landfill capacity is likely to be available until at least the end of 2010 leaving some time to consider this situation in more detail.

Alternatively, the capacity provided by the three landfills at Usk, Nevitt and Drehid should be reviewed simultaneously by the Bord to ensure that the region is adequately serviced without compromising long term goals. Based on the analysis above, it appears the most effective solution would be to approve only the Drehid extension to cover any potential deficit in the GDA until the Poolbeg WTE facility is developed. At this point, the total available capacity in the GDA and Ireland should be reviewed and rationalised to avoid any oversupply of landfill capacity. It would be important that this review process is both effectively monitored and enforced.

Controlling the amount of landfill capacity available in the GDA, and in Ireland, will ensure that alternatives to landfill become viable in the long term. It will thereby enable Ireland to make progress towards its landfill diversion targets and recycling goals. If the Drehid extension were to be approved to provide controlled and temporary capacity, in the place of the Nevitt and Usk facilities, it could be said that the development would be compatible with Government policy and the concept of sustainable development.

¹¹ or higher if Usk is not developed

Appendix A: Landfill Figures in 2006

Landfill capacity compared to waste deposited in 2006 based on figures from the EPA's *National Waste Report 2006*. The approved capacity for Arthurstown has been revised to align with capacity estimates from Appendix 1.2.1 of the Drehid WMF Intensification and Extension EIS.

Waste Region	Landfill	Current Status	Waste Deposited (Based on EPA 2006)	Approved Capacity
Clare	Inagh	Operational	32738	58,500
Limerick	Gortadroma	Operational	76446	130,000
Kerry	North Kerry	Operational	58991	77,000
<i>Total</i>			168,175	263,500
Connaught	Ballaghaderreen	Operational	19286	25,000
	Derrinnumera	Operational	25734	40,000
	Rathroeen	Operational	17794	45,000
	East Galway / Connaught Regional	Operational	95178	100,000
<i>Total</i>			157,992	210,000
Cork	Derryconnell	Due for closure 2008/9	11711	14,000
	East Cork	Closed end 2006	38945	120,000
	Kinsale Road	Due for closure 2008/9	35658	100,000
	Youghal	Due for closure 2009/10	14163	170,000
	Bottlehill	Built but not operational	0	217,000
<i>Total</i>			100,477	621,000
Donegal	Ballynacarrick	Operational	30026	23,500
<i>Total</i>			30,026	23,500
Dublin	Arthurstown	Due for closure 2010	591755	400,000
	Balleally	Due for closure 2008/9	130766	450,000
<i>Total</i>			722,521	850,000
Kildare	KTK	Due for closure 2008/9	209725	275,000
	Drehid	Operational 2008	-	-
	Usk	Operational 2010	-	-
	Kerdiffstown	Operational	0	235,000
<i>Total</i>			209,725	510,000
Midlands	Ballaghveny	Operational	30728	37,000
	Ballydonagh	Operational	30151	60,000
	Derryclure	Operational	40284	40,000
	Kyletalesha	Operational	46504	47,100
<i>Total</i>			147,667	184,100

Waste Region	Landfill	Current Status	Waste Deposited (Based on EPA 2006)	Approved Capacity
North East	Corranure	Due for closure 2011	84465	90,000
	Scotch Corner	Operational	22357	39,500
	Whiteriver	Operational	72044	92,000
	Knockharley	Operational	133120	132,000
<i>Total</i>			311,986	353,500
South East	Donohill	Operational	19918	40,000
	Dunmore	Due for closure	16257	42,495
	Killurin	Closed end 2006	8620	8000
	Powerstown	Operational	36423	40,000
<i>Total</i>			81,218	130,495
Wicklow	Rampere	Due for closure 2010	10935	50,000
	Ballynagran	Operational	39896	150,000
<i>Total</i>			50,831	200,000
Total			1,980,618	3,346,095

Excess:	1,365,477 tpa
	169% %

Appendix B: Estimated Capacity in 2010

Estimated landfill capacity in 2010 assuming the closure of numerous landfills in Clare/Limerick/Kerry, Connaught, Cork, Dublin, Kildare, the South-East and Wicklow as highlighted in yellow as well as the opening of the Usk landfill. Planned additional capacity in Dublin and Meath are highlighted in orange. In this scenario, the Nevitt landfill has been delayed.

Waste Region	Landfill	Current Status	Waste Deposited (Based on EPA 2006)	Approved Capacity	Excess
	Inagh	Operational	32738	56,500	23,762
Clare Limerick Kerry	Gortadroma	Operational	76446	130,000	53,554
	North Kerry	Closed	58991		-58,991
<i>Total</i>			168,175	186,500	18,325
	Ballaghaderreen	Due for closure 2011	19286	25,000	5,714
Connaught	Derrinumera	Closed	25734		-25,734
	Rathroeen	Operational	17794	45,000	27,206
	East Galway / Connaught Regional	Operational	95178	100,000	4,822
<i>Total</i>			157,992	170,000	12,008
	Derryconnell	Closed	11711		-11,711
Cork	East Cork	Closed	38945		-38,945
	Kinsale Road	Closed	35658		-35,658
	Youghal	Closed	14163		-14,163
	Bottlehill	Operational	0	217,000	217,000
<i>Total</i>			100,477	217,000	116,523
Donegal	Ballynacarrick	Operational	30026	23,500	-6,526
<i>Total</i>			30,026	23,500	-6,526
Dublin	Arthurstown	Due for closure 2010	591755	400,000	-191,755
	Balleally	Closed	130766		-130,766
	Poolbeg WTE	Operational 2012			0
	Nevitt	Operational 2010			0
<i>Total</i>			722,521	400,000	-322,521
Kildare	KTK	Closed	209725		-209,725
	Drehid	Operational		120,000	120,000
	Usk	Operational		200,000	200,000
	Kerdiffstown	Operational		235,000	235,000
<i>Total</i>			209,725	555,000	345,275
	Ballaghveny	Due for closure 2010	30728	37,000	6,272
Midlands	Ballydonagh	Due for closure 2010	30151	60,000	29,849
	Derryclure	Due for closure 2011	40284	40,000	-284
	Kyletalesha	Operational	46504	47,100	596
<i>Total</i>			147,667	184,100	36,433

Waste Region	Landfill	Current Status	Waste Deposited (Based on EPA 2006)	ABP Capacity - with closures	Excess
	Corranure	Due for closure 2011	84485	90,000	5,535
North East	Scotch Corner	Operational	22357	39,500	17,143
	Whiteriver	Operational	72044	92,000	19,956
	Knockharley	Operational	133120	88,000	-45,120
	Carranstown WTE	Operational 2011			0
<i>Total</i>			311,986	309,500	-2,486
	Donohill	Closed	19918		-19,918
South East	Dunmore	Closed	16257		-16,257
	Killurin	Closed	8620		-8,620
	Powerstown	Due for closure 2010	36423	40,000	3,577
<i>Total</i>			81,218	40,000	-41,218
Wicklow	Rampere	Due for closure 2010	10935	50,000	39,065
	Ballynagran	Operational	39896	150,000	110,104
<i>Total</i>			50,831	200,000	149,169
Total			1,980,618	2,285,600	304,982

Appendix C: Estimated Capacity post 2010

Estimated landfill capacity post 2010 assuming further closures in Connaught, the Midlands, the North East and Wicklow as shown in yellow. This scenario also assumes the opening of Carranstown WTE, Poolbeg WTE and Nevitt in the GDA as highlighted in orange.

Waste Region	Landfill	Current Status	Waste Deposited (Based on EPA 2006)	Approved Capacity	Excess
	Inagh	Operational	32738	58,500	23,762
Clare Limerick Kerry	Gortadroma	Operational	76446	130,000	53,554
	North Kerry	Closed	58991		-58,991
<i>Total</i>			168,175	186,500	18,325
	Ballaghaderreen	Closed	19286		-19,286
Connaught	Derrinumera	Closed	25734		-25,734
	Rathroeen	Operational	17794	45,000	27,206
	East Galway / Connaught Regional	Operational	95178	100,000	4,822
<i>Total</i>			157,992	145,000	-12,992
	Derryconnell	Closed	11711		-11,711
Cork	East Cork	Closed	38945		-38,945
	Kinsale Road	Closed	35658		-35,658
	Youghal	Closed	14163		-14,163
	Bottlehill	Operational		217,000	217,000
<i>Total</i>			100,477	217,000	116,523
Donegal	Ballynacarrick	Operational	30026	23,500	-6,526
<i>Total</i>			30,026	23,500	-6,526
Dublin	Arthurstown	Closed	591755		-591,755
	Balleally	Closed	130766		-130,766
	Poolbeg WTE	Operational		600,000	600,000
	Nevitt	Operational		500,000	500,000
<i>Total</i>			722,521	1,100,000	377,479
Kildare	KTK	Closed	209725		-209,725
	Drehid	Operational		120,000	120,000
	Usk	Operational		200,000	200,000
	Kerdiffstown	Operational		235,000	235,000
<i>Total</i>			209,725	555,000	345,275
	Ballaghveny	Closed	30728		-30,728
Midlands	Ballydonagh	Closed	30151		-30,151
	Derryclure	Closed	40284		-40,284
	Kyletalesha	Operational	46504	47,100	596
<i>Total</i>			147,667	47,100	-100,567

Waste Region	Landfill	Current Status	Waste Deposited (Based on EPA 2006)	ABP Capacity - with closures	Excess
	Corranure	Closed	84465		-84,465
North East	Scotch Corner	Operational	22357	39,500	17,143
	Whiteriver	Operational	72044	92,000	19,956
	Knockharley	Operational	133120	88,000	-45,120
	Carranstown WTE	Operational		200,000	200,000
<i>Total</i>			311,986	419,500	107,514
	Donohill	Closed	19918		-19,918
South East	Dunmore	Closed	16257		-16,257
	Killurin	Closed	8620		-8,620
	Powerstown	Closed	36423		-36,423
<i>Total</i>			81,218	0	-81,218
Wicklow	Rampere	Closed	10935		-10,935
	Ballynagran	Operational	39896	150,000	110,104
<i>Total</i>			50,831	150,000	99,169
Total			1,980,618	2,843,600	862,982