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22<sup>nd</sup> June 2020

**Re: SEM-20-028 - Implementation of Regulation 2019/943 in relation to Dispatch and Redispatch**

Dear Sirs,

In response to the current consultation on the above-referenced subject, I offer the following comments on behalf of the IWMA. The IWMA is comprised of just over 40 member companies that operate in the waste sector in Ireland. Our website, [www.iwma.ie](http://www.iwma.ie), provides details of our members, including a number of companies that produce energy from waste.

Waste to Energy (WTE) facilities are a critical part of Ireland's waste management infrastructure. With regard to public health and safety, the requirement to process waste and the maintenance of waste processing capacity is deemed as an essential service (as identified during the ongoing COVID-19 pandemic), and any action to limit this capacity is clearly detrimental to the public interest.

WtE plants produce renewable energy as a by-product of their process, but they are primarily waste processing facilities. Collectively in Ireland, WTE plants cater for c.46% of the waste treatment capacity for residual municipal solid waste (MSW) – equating to c.820Ktonnes of waste per annum.

In addition, these facilities contribute significantly to Ireland meeting its waste recovery targets, laid down by the EU. The two main alternative treatment routes for residual MSW are landfill and export to WTE in Europe. Cement Kilns also provide some disposal options but are less critical.

The existing waste treatment capacity for residual MSW in Ireland is critical with a capacity deficit recorded in 2019. The deficit was managed by temporary storage of waste at transfer stations until January 2020. The Regional waste Planners' predictions for this year are similar. Any actions taken by the TSO that could reduce the capacity of the WTE plants would have a serious impact on Ireland's ability to manage its waste, which in a worst case scenario would require the intervention of the Government and the use of emergency powers to over-ride planning and licence consents. This occurred in 2016 when Ireland's Waste to Energy and landfill capacity fell well short of the required residual waste treatment capacity for that year.

Hence, the IWMA believe that the WTE plants should not be subject to being dispatched down and/or curtailed to the extent that their ability to process waste at their maximum licensed throughput is compromised. The implications are much broader than energy considerations and we expect that the officials in the Waste Policy & Resource Efficiency Division of the Department of Communications, Climate Action and Environment will support that view, given the difficulty that they faced in 2016 and the efforts made in the last 4 years to ensure that capacity meets demand for residual municipal waste.

WTE plants are classified as R1 – Recovery facilities under the Waste Framework Directive, with this classification being determined by the Energy Efficiency of the facilities. Reducing the energy output of the WTE plants while they process waste, even at a slightly reduced load, can impact the energy

efficiency calculation for the facilities. Currently the minimum energy efficiency allowed is 0.65. It has been observed in the industry that the WTE facilities have reduced deliveries in the winter months as the level of dispatched down/ curtailed was very high (up to c.20%).

It is the IWMA's understanding that this reduction is impacting on the Energy efficiency of the plants to the extent that this 0.65 figure is at risk. Should this level of 0.65 be breached then the facilities become disposal facilities. The impact of this is that Ireland will no longer meet its recovery targets and will be subject to daily fines from the EU until such time as it does.

Another point worth mentioning is that WTE plants help to reduce Ireland's GHG emissions. Incinerating waste without producing energy is contrary to this and the TSO should be mindful of this fact also in making its decisions around priority dispatch.

In summary, the IWMA contends that WTE facilities are critical to waste management in Ireland and any move by the TSO that could have the unintended consequence of reducing their throughput should not be considered.

We know from discussions earlier this year at a meeting of the Waste Capacity Working Group that the IWMA position on this matter is supported by the Regional Planners for Waste Management in Ireland and by the officials in the Waste Policy & Resource Efficiency Division of the Department of Communications, Climate Action and Environment. These public officials are as concerned as the IWMA about the likely impacts of any reduction in the capacity of the existing WTE plants to process residual municipal waste and to generate energy from that waste.

Yours Sincerely,



Conor Walsh  
IWMA Secretary

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