



Department of Communications, Climate Action
and Environment,
Newton Road,
Wexford
Y35 AP90

Via email only to: Wastecomments@DCCAIE.gov.ie

21 February

Re. Public Consultation: Waste Action Plan for a Circular Economy

Dear Sir/Madam,

I write on behalf of the Institute of Geologists of Ireland (IGI). The IGI promotes and advances the science of geology and its professional application in Ireland; and ensures that its members uphold, develop and maintain the highest professional standards. A stated objective of the IGI is to promote improvements in the law and take any other steps and proceedings as may be deemed necessary in the interests of the IGI and its members. Accordingly, IGI makes the following observations and wishes to note the role of the geoscientist in achieving Ireland's waste sector as it transitions to a Circular Economy.

The consultation document is welcomed and as it is an extensive document we have focused only on areas which are of relevance to our membership.

2.0 INSTITUTIONAL ARRANGEMENTS

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

Adequate resource assessment and environmental impact assessment assists in ensuring our natural resources are developed in an efficient, economical and sustainable manner. IGI's membership are involved in the completing these assessments and we have a number of initiatives which may assist including:

- Guidelines for the Preparation of Soils, Geology and Hydrogeology Chapters of Environmental Impact Statements;
- Professional Registers for Geoscientists involved in Contaminated Land Risk Assessments.

The IGI supports efficient development of our natural resources as well as circular economy principles including waste reduction and recycling.

Company number 314400. Directors: Mairead Glennon, Cian O'Hora, Eoin Wyse, Jon Hunt



Member of the
European Federation
of Geologists

The Institute of Geologists of Ireland

63 Merrion Square, Dublin, D02 TW21, Ireland
Tel: +353 1 662 4914 e-mail: info@igi.ie web: www.igi.ie



12.0 BY-PRODUCTS

How do you think the By-product process could be improved?

IGI response: With regards to geological and contamination status of soil and stone the IGI's register of Contaminated Land experts could assist in the assessment of soil and stone for by-product suitability.

13.0 END OF WASTE

Should the Government seek to establish a group to apply for national End of Waste decisions for appropriate products e.g. Aggregates, Incinerator Bottom Ash?

IGI response: Yes. We would much welcome the State seeking national 'end of waste' decisions for appropriate materials.

If yes:

- **what expertise would be necessary for such a team**

IGI response: A group of experts to include Professional Geologists who specialise in aggregates and environmental assessments.

- **who should be represented**

IGI response: No comment.

- **are there other materials which you believe are suitable for national end of waste decisions?**

IGI response: A range of geological materials such as mine waste, tunnelling arisings, quarry waste and excavated soil and stone waste could be considered for end-of-waste, subject to the environmental criteria for end-of-waste being met.

The IGI also recommends an examination of the circular economy with regard to raw materials (minerals and aggregates) which may be lost during the value chain in consumable products (e.g. cosmetics, medicines) or bound in long-term usage (e.g. energy infrastructure). This loss/binding of raw materials during the value chain means that the need to produce primary raw materials such as metallic minerals and aggregates is still significant to 'feed' the circular economy. Furthermore, an increase in the primary production of Critical Raw Materials



(including metals) is required to support low-carbon technologies which are raw material-intensive compared to traditional energy technologies and fuels¹.

We would be delighted to assist with any further queries you might have regarding any of the above.

Yours sincerely,

EurGeol Cian O'Hora PGeo
On behalf of the IGI

¹ Arrobas, Daniele La Porta; Hund, Kirsten Lori; McCormick, Michael Stephen; Ningthoujam, Jagabanta; Drexhage, John Richard. 2017. *The Growing Role of Minerals and Metals for a Low Carbon Future (English)*. Washington, D.C. : World Bank Group. <http://documents.worldbank.org/curated/en/207371500386458722/The-Growing-Role-of-Minerals-and-Metals-for-a-Low-Carbon-Future>