



Environmental Protection Agency  
Headquarters, PO Box 3000  
Johnstown Castle Estate  
Co Wexford,  
Y35 W821, Ireland

Via email only to: [byproduct@epa.ie](mailto:byproduct@epa.ie)

30 September 2022

## **Re. Public Consultation: Article 27 Consultation**

Dear Sir/Madam,

The IGI promotes and advances the science of geology and its professional application in Ireland. It 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, the IGI makes the following observations and wishes to note the role of the geoscientist in achieving Ireland's 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.

### **1. Notified Material**

Assessment of soil quality requires input by a competent qualified environmental professional. Involvement of an independent qualified professional (e.g. PGeo, CSci, CEng, MCIWM etc) who hold appropriate P.I. insurance will assist in complying with Regulation 27(1)(d).

A designated qualified person is mentioned in Section 3.5 of the document as a suggestion but does not appear elsewhere and is not a requirement. We would suggest better defining this role and making it a requirement.

The IGI maintain a register of competent persons with respect to contaminated land/unregulated waste assessment following the EPA Code of Practice. We feel these individuals would hold the relevant knowledge and experience to fulfil this "designated qualified person" in relation to soil condition.

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

Company number 314400. Directors: Suzanne Tynan, Yvonne O'Connell, Cian O'Hora, Eoin Wyse



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European Federation  
of Geologists

**The Institute of Geologists of Ireland**

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Yours sincerely,

EurGeol Eoin Wyse PGeo  
Vice-President

On behalf of the IGI

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