



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

Via email only to: article28@epa.ie

24 February 2023

Re. Public Consultation: Article 28 End of Waste 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.

Reference is made to the carrying out of a Due Diligence assessment on incoming waste materials for processing into recycled aggregates. This Due Diligence assessment is required to identify the following:

- The history and origin of the incoming wastes with the purpose of identifying any potentially restricted or deleterious materials; and,
- Based on the history of the originating site and nature of the incoming wastes, any additional contaminants of concern which may be present which could pose a risk to the environment and/or human health.

In addition, the document also talks about extensive sampling and testing of materials to establish compliance with the End of Waste Criteria. Both of these roles require the input of a "qualified person".

The IGI holds an EPA approved register for competent persons with respect to contaminated land/unregulated waste assessment following the EPA Code of Practice. In order to be admitted to the register, geoscientists must hold the PGeo title and make an application outlining their experience and qualifications relevant to contaminated land/environmental geology. Members on the register must maintain relevant CPD training each year to continue on the register.

We feel these individuals would hold the relevant knowledge and experience could fulfil this "qualified person" designation in relation to the preparation of Due Diligences, the identification of additional

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potential contaminants of concern and in the establishment of acceptable limits for these parameters. Furthermore, individuals on this register have experience in the impact materials and processes may have upon the environment and/or human health. The register is available on the IGI's website : <https://igi.ie/specialist-registers/>.

We would therefore respectfully suggest that these individuals would represent "qualified persons" with respect to the Article 28 End of Waste decisions.

We wish you all the best in the ongoing consultation and look forward to seeing the final product.

Yours sincerely,

EurGeol Eoin Wyse PGeo
Vice-President

On behalf of the IGI