



End-of-Waste Regulations Consultation,  
Circular Economy Division,  
Department of the Environment, Climate and Communications,  
Newtown Road,  
Wexford,  
Y35 AP90.

Via email only to: [circeconmaterials@decc.gov.ie](mailto:circeconmaterials@decc.gov.ie)

10 October 2024

**Re. Consultation on draft regulations to reform the End-of-Waste decision making process**

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 and in particular the contributions they can make relating to the End-of-Waste decision making process.

Overall, the consultation document is welcomed, and we have focused only on those areas which are of relevance to our membership.

The majority of the proposed Regulation relates to the introduction of statutory timescales which is to be welcomed. By providing guidance for both single case and national decisions, it provides some clarity in relation to the periods associated with these decisions.

Specific reference is made in relation to the requirement for risk assessments considering the likely impact proposed end-of-waste materials may have upon the receiving environment and human health as set out in (Part 2, Section 3 (2.d.ix)). It should be noted that this approach uses the same methodologies applied in assessing the risk associated with wastes present in landfills and in made ground on sites, which is outlined in the EPA guidance relating to contaminated land and unregulated landfill sites. These assessments, the assumptions behind them, and the understanding of the receiving environment are critical in the establishment of realistic, practicable and appropriate pollutant limits which will form an intrinsic part of the End-of-Waste decision making process.

Designated qualified persons should be used when preparing these risk assessments. We would suggest highlighting the importance of the experience, expertise and knowledge these persons hold in relation to the preparation of these risk assessments.

Company number 314400. Directors: Eoin Wyse, Siobhán Power, Emer Blackwell, Yvonne O'Connell



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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 skills, knowledge and experience to assess the likely impacts these materials may have upon the receiving environment, namely groundwater, soils and human health. These skills would then allow them to establish appropriate pollutant limits.

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

Yours sincerely,

EurGeol Eoin Wyse PGeo  
President

On behalf of the IGI

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