CIWM is the professional body for the resource and waste management sector. It represents around 5,500 waste and resource management professionals, predominantly in the UK but also overseas. CIWM sets the professional standards for individuals working in the sector and has various grades of membership determined by education, qualification and experience.

**Discussion Paper on Construction and Demolition Waste Acceptance Limits for Facilities authorised under Waste Facility Permits and Certificates of Registration**

CIWM Ireland Centre welcome the opportunity to respond to this discussion paper and provide this considered response.

In the context of the discussion paper to review the viability of the existing tonnage thresholds on Soil and Stone management being increased CIWM Ireland considered the implication of the same on:

* Environment
* Local Authority resources
* Current licensed facilities
* Other impacts

In terms of the key reference review criteria, CIWM Ireland provide the following feedback for your consideration.

1) Tonnage threshold increase - timeline to make a decision is of concern and it is recommended that this is specified for both permit and licence sites.

2) Environmental Impact - the increased tonnage thresholds will be in any event be duly managed via the existing requirement to carry out an Environmental Impact Assessment (EIA) and any potential impact controlled.

3) Local Authority resources - there will be an increased resource demand.

4) Licensed Facilities - tonnage threshold increase could provide new entrants with an unfair economic advantage over existing licence holders. Worth considering aligning Waste Management (Facility Permit and Registration) Regulations with current Waste Licence Regulations.

5) Cost of a licence application is significantly more than for a permit. Furthermore, the environmental monitoring specified in a licence is more onerous and expensive together with licence administration charges.

6) Other - increases in tonnage threshold would move Certificate of Registration for Class 5 operations into activities where an EIA would be required, along with full planning permission.