



An
Bord
Pleanála

Record of 1st Meeting

ABP-308903-20

Development	Extension of alumina extraction facility at Aughinish, Alumina, Co. Limerick		
Location	Virtually by Microsoft Teams		
Case Type	Pre-application consultation		
1st / 2nd / 3rd Meeting	1 st		
Date	19/02/2021	Time	11:00a.m. – 12:20p.m.

Attendees		
Representing An Bord Pleanála		
Brendan Wyse, Assistant Director of Planning (Chair)		
Una Crosse, Senior Planning Inspector		
Jennifer Sherry, Executive Officer	j.sherry@pleanala.ie	01-8737266
Representing the Prospective Applicant		
Louise Clune, Aughinish Alumina		
Colm Cribbin, Aughinish Alumina		
Agnes McLaverty, Aughinish Alumina		
Brian Keenan, Golder		

Stephen Barrett, Tom Philips + Associates
Gavin Lawlor, Tom Philips + Associates
John Kelly, Brady Shipman Martin
Gavin Fennessy, Ecology Ireland

Introduction

The Board referred to the letter received from the prospective applicant requesting pre-application consultations and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive from the Board.

The Board mentioned the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.

- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or any legal proceedings.

Presentation by the prospective applicant

The prospective applicant provided an overview of the Aughinish Alumina refinery stating it has been in operation for almost 40 years with an estimated value of almost €2 billion and represents 30% of alumina production in Europe. The prospective applicant advised Aughinish Alumina is a responsible employer to 459 employees and 220 contractors in a rural region.

A number of topics were discussed by the prospective applicant under the following headings:

- **Biodiversity** – the refinery and Bauxite Residue Disposal Area (BRDA) is surrounded by thriving habitats and species protected by the Habitats Directive with a SAC and SPA in proximity. There is a biodiversity management plan in place.
- **Aluminium Industry** – the EU recognises Bauxite as a critical raw material and of strategic importance to the aluminum industry which in Europe is under supplied. Aughinish is a leading supplier of alumina in Europe and aluminum is a key part of a low carbon future.
- **Decarbonisation** – a key strategic goal of Aughinish is for a low carbon future with a 40% reduction in CO₂ emissions since 2006 and a commitment to further reduce emissions by 35% by 2030.
- **Bauxite Residue and BRDA** – Bauxite Residue is an extract waste material generated as a by-product of the Bayer Process that is washed and filtered until it becomes 58% solids paste that is then transported by pipeline to the BRDA. Approximately 1.5mTpa of bauxite residue is deposited on the BRDA which is designed using Best Available Techniques (BAT) and consists of dry stacking washed and dried residue in an upstream system with 2m rock embankments, to increase the height of the BRDA and manage disposal.
- **BRDA Management** – Bauxite residue disposal area is a category A facility under the Extractive Waste Directive with non-hazardous classification.

- **BRDA Rehabilitation** – Aughinish have successfully demonstrated the revegetation process for post closure management by using BAT which demonstrates the long-term sustainable land use for post closure management. Aughinish is fully committed to identifying technically and economically feasible options to reduce residue storage.
- **Innovative Waste Reduction** - Aughinish is committed to eliminating the process of Salt Cake, a hazardous waste stream. A Wet Air Oxidation process has been identified by Aughinish to eliminate Salt Cake with zero emissions by 2022.

The proposed development will comprise the following:

- The operational life of the BRDA currently extends to 2031. The prospective applicant proposes to further increase the capacity of the BRDA by increasing the height to accommodate further storage of bauxite residue at the facility from a permitted 32mOD to a maximum central elevation of 44mOD. This will provide for the disposal of c.1.59 million tonnes of bauxite residue per year for an additional c.9 years.
- The proposed application will also include a modification of the existing Salt Cake disposal area to accommodate an additional c.22,500 m³ of Salt Cake.
- An extension of the permitted Borrow Pit by doubling in size to provide an additional extraction area of c.4.6 hectares and c.446,000 m³ of rock to be used in the construction of the proposed BRDA extension.

A series of photomontages were included in the presentation from the prospective applicant which provided a selection of different existing and proposed viewpoints taken at different locations in 2007, 2019 and for the current proposed application.

The prospective applicant is of the opinion that the proposed development comes within the scope of strategic infrastructure and falls within the criteria set out in section 37(A)(2) of the Planning and Development Acts.

Discussion

The following matters were discussed:

- The Board noted the three different elements of the proposed development being: the increase of capacity of the BRDA, the modification of the salt cake disposal area and the increase in size of the Borrow Pit. The Board advised that it is important to clearly outline within the documentation the potential impacts arising from the different elements of the proposed development.
- The Board's representatives enquired if the prospective applicant has undertaken survey work in respect of the relevant qualifying interests/special conservation interests to provide a baseline for assessing significant environmental impacts/effects. The prospective applicant said an extensive amount of ecological data has been collated on the site and noted that a Wildlife Ranger is employed on the site.
- The Board's representatives addressed the matter of screening out qualifying interests within sites that are being carried forward to appropriate assessment. The Board is of the opinion that an NIS will be required for the proposed development and the information within same should be as robust as is possible. It is necessary to provide satisfactory evidence that all potential pathways to relevant Natura 2000 sites have been addressed.
- The Board's representatives highlighted, in relation to the EIAR, that cumulative impacts should be set out as comprehensively as possible taking into account development within the Shannon Foynes Estuary Area and other plans and projects of relevance.
- The Board's representatives enquired whether it was proposed to seek a 20-year permission to facilitate the proposed development. The prospective applicant outlined that the development has not been subject to permissions of specific duration to date and it was not proposed to seek a permission of limited duration. The Board advised the prospective applicant to ensure that the documentation makes it clear that the extension of 9 years for the operational life of the BRDA is not a time limit on the permission.
- The Board commented on the Salt Cake disposal area and noted that a new process has been identified by the prospective applicant which will eliminate Salt Cake hazardous waste by 2022. The Board's representatives enquired as to the rationale

for the proposed extension to the Salt Cake disposal area given the proposed new process. The prospective applicant in response advised that the proposed modification is to allow for the decommissioning of the disposal area over a period of 3 years.

Conclusion

The Board's representatives stated that it was their preliminary opinion that the proposed development would constitute a strategic infrastructure development but noted that this is ultimately a decision for the Board.

The record of the meeting will issue to the prospective applicant and the prospective applicant can submit any comments it may have in writing or alternatively bring comments for discussion at the time of a further meeting. The onus is on the prospective applicant to either request a further meeting or request formal closure of the pre-application consultation process.



Brendan Wyse
Assistant Director of Planning
26 February