

**RESOURCE & WASTE
MANAGEMENT PLAN FOR
A PROPOSED COMMERCIAL
DEVELOPMENT
AT
1 NORTH WALL QUAY,
DUBLIN 1, D01 T8Y1**

APPENDIX 13.1

Report Prepared For

NWQ Devco Ltd.

Report Prepared By

Chonail Bradley
Principal Environmental Consultant

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Name	Chonaiil Bradley	Fergal Callaghan
Title	Principal Environmental Consultant	Director
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Contents	Page
1.0 INTRODUCTION	4
2.0 C&D RESOURCE & WASTE MANAGEMENT IN IRELAND	4
2.1 National Level	4
2.2 Regional Level	6
2.3 Legislative Requirements	8
3.0 Design Approach	9
3.1 Designing For Prevention, Reuse and Recycling	9
3.2 Designing for Green Procurement	9
3.3 Designing for Off-Site Construction	10
3.4 Designing for Materials Optimisation During Construction	10
3.5 Designing for Flexibility and Deconstruction	10
4.0 DESCRIPTION OF THE PROJECT	10
4.1 Location, Size and Scale of the Development	10
4.2 Details of the Non-Hazardous Wastes to be Produced	12
4.3 Potential Hazardous Wastes Arising	14
5.0 Roles and Responsibilities	15
5.1 Role of the Client	15
5.2 Role of the Client Advisory Team	15
5.3 Future Role of the Contractor	16
6.0 Key Materials & Quantities	16
6.1 Project Resource Targets	16
6.2 Main Construction Waste Categories	17
7.0 WASTE MANAGEMENT	17
7.1 Demolition Waste Generation	17
7.2 Construction Waste Generation	18
7.3 Proposed Resource and Waste Management Options	19
7.4 Tracking and Documentation Procedures for Off-Site Waste	22
8.0 ESTIMATED COST OF WASTE MANAGEMENT	23
8.1 Reuse	23
8.2 Recycling	23
8.3 Disposal	23
9.0 DEMOLITION PROCEDURES	23
10.0 TRAINING PROVISIONS	24
10.1 Resource Manager Training and Responsibilities	24
10.2 Site Crew Training	24

11.0	TRACKING AND TRACING / RECORD KEEPING	25
12.0	OUTLINE WASTE AUDIT PROCEDURE.....	26
12.1	Responsibility for Waste Audit.....	26
12.2	Review of Records and Identification of Corrective Actions.....	26
13.0	CONSULTATION WITH RELEVANT BODIES	26
13.1	Local Authority	26
13.2	Recycling/Salvage Companies.....	26
13.3	Pest Management.....	26
14.0	CONCLUSION	27
15.0	REFERENCES	28

1.0 INTRODUCTION

AWN Consulting Ltd. (AWN) has prepared this Resource and Waste Management Plan (RWMP) on behalf of NWQ Devco Ltd. The proposed development provides for the demolition of the existing building and construction of a new building ranging in height from 9 no. to 17 no. storeys over lower ground floor and double basement comprising of office accommodation, arts/community/cultural uses and a retail/café/restaurant unit.

This plan provides information necessary to ensure that the management of C&D waste at the site is undertaken in accordance with the current legal and industry standards including the *Waste Management Act 1996* as amended and associated Regulations ¹, *Environmental Protection Agency Act 1992* as amended ², *Litter Pollution Act 1997* as amended ³, the *Eastern-Midlands Region (EMR) Waste Management Plan 2015 – 2021* ⁴ and the Draft National Waste Management Plan for a Circular Economy (NWMPCE) (2023) ⁵. In particular, this plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also provides appropriate measures in relation to the collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

This RWMP includes information on the legal and policy framework for C&D waste management in Ireland, estimates of the type and quantity of waste to be generated by the proposed development and prescribes measures for the management of different waste streams. The RWMP should be viewed as a live document and will be regularly revisited throughout the project's lifecycle so that opportunities to maximise waste reduction / efficiencies are exploited throughout, and that data is collected on an ongoing basis so that it is as accurate as possible.

2.0 C&D RESOURCE & WASTE MANAGEMENT IN IRELAND

2.1 National Level

The Irish Government issued a policy statement in September 1998, *Changing Our Ways* ⁶, which identified objectives for the prevention, minimisation, reuse, recycling, recovery and disposal of waste in Ireland. The target for C&D waste in this report was to recycle at least 50% of C&D waste within a five year period (by 2003), with a progressive increase to at least 85% over fifteen years (i.e. 2018).

In response to the *Changing Our Ways* report, a task force (Task Force B4) representing the waste sector of the already established Forum for the Construction Industry, released a report entitled '*Recycling of Construction and Demolition Waste*' ⁷ concerning the development and implementation of a voluntary construction industry programme to meet the Government's objectives for the recovery of C&D waste.

In September 2020, the Irish Government published a policy document outlining a new action plan for Ireland to cover the period of 2020-2025. This plan, '*A Waste Action Plan for a Circular Economy*' ⁸ (WAPCE), replaces the previous national waste management plan, '*A Resource Opportunity*' (2012), and was prepared in response to the 'European Green Deal' which sets a roadmap for a transition to an altered economical model, where climate and environmental challenges are turned into opportunities.

The WAPCE sets the direction for waste planning and management in Ireland up to 2025. This reorientates policy from a focus on managing waste to a much greater focus on creating circular patterns of production and consumption. Other policy statements of a number of public bodies already acknowledge the circular economy as a national policy priority.

The policy document contains over 200 measures across various waste areas including circular economy, municipal waste, consumer protection and citizen engagement, plastics and packaging, construction and demolition, textiles, green public procurement and waste enforcement.

One of the first actions to be taken was the development of the *Whole of Government Circular Economy Strategy 2022-2023 'Living More, Using Less'* (2021) ⁹ to set a course for Ireland to transition across all sectors and at all levels of Government toward circularity and was issued in December 2021. It is anticipated that the Strategy will be updated in full every 18 months to 2 years.

The Circular Economy and Miscellaneous Provisions Act 2022 ¹⁰ was signed into law in July 2022. The Act underpins Ireland's shift from a "take-make-waste" linear model to a more sustainable pattern of production and consumption, that retains the value of resources in our economy for as long as possible and that will work to significantly reduce our greenhouse gas emissions. The Act defines Circular Economy for the first time in Irish law, incentivises the use of recycled and reusable alternatives to wasteful, single-use disposable packaging, introduces a mandatory segregation and incentivised charging regime for commercial waste, streamlines the national processes for End-of-Waste and By-Products decisions, tackling the delays which can be encountered by industry, and supporting the availability of recycled secondary raw materials in the Irish market, and tackles illegal fly-tipping and littering.

The Environmental Protection Agency (EPA) of Ireland issued '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects*' in November 2021 ¹¹. These guidelines replace the previous 2006 guidelines issued by The National Construction and Demolition Waste Council (NCDWC) and the Department of the Environment, Heritage and Local Government (DoEHLG) in 2006 ¹². The guidelines provide a practical approach which is informed by best practice in the prevention and management of C&D wastes and resources from design to construction of a project, including consideration of the deconstruction of a project. These guidelines have been followed in the preparation of this document and include the following elements:

- Predicted C&D wastes and procedures to prevent, minimise, recycle and reuse wastes;
- Design teams roles and approach;
- Relevant EU, national and local waste policy, legislation and guidelines;
- Waste disposal/recycling of C&D wastes at the site;
- Provision of training for Resource Waste Manager (RM) and site crew;
- Details of proposed record keeping system;
- Details of waste audit procedures and plan; and
- Details of consultation with relevant bodies i.e. waste recycling companies, Local Authority, etc.

Section 3 of the Guidelines identifies thresholds above which there is a requirement for the preparation of a bespoke RWMP for developments. The new guidance classifies developments on a two-tiered system. Developments which do not exceed

any of the following thresholds may be classed as Tier 1 development, which require a simplified RWMP:

- New residential development of less than 10 dwellings.
- Retrofit of 20 dwellings or less.
- New commercial, industrial, infrastructural, institutional, educational, health and other developments with an aggregate floor area less than 1,250m².
- Retrofit of commercial, industrial, infrastructural, institutional, educational, health and other developments with an aggregate floor area less than 2,000m²; and
- Demolition projects generating in total less than 100m³ in volume of C&D waste.

A development which exceeds one or more of these thresholds is classed as Tier-2 projects.

This development requires a RWMP as a Tier 2 development as it is above following criterion:

- New commercial, industrial, infrastructural, institutional, educational, health and other developments with an aggregate floor area less than 1,250m²;and
- Demolition projects generating in total less than 100m³ in volume of C&D waste.

Other guidelines followed in the preparation of this report include '*Construction and Demolition Waste Management – a handbook for Contractors and Site Managers*'¹³, published by FÁS and the Construction Industry Federation in 2002 and the previous guidelines, 'Best Practice Guidelines for the Preparation of Waste Management Plans for Construction and Demolition Projects' (2006).

These guidance documents are considered to define best practice for C&D projects in Ireland and describe how C&D projects are to be undertaken such that environmental impacts and risks are minimised and maximum levels of waste recycling are achieved.

2.2 Regional Level

The proposed development is located in the Local Authority area of Dublin City Council (DCC). The *EMR Management Plan 2015 – 2021* is the regional waste management plan for the administrative area, published in May 2015. Currently the EMR and other regional waste management plans are under review and the Regional Waste Management Planning Offices have issued the draft NWMPCE in June 2023.

The Regional Plan sets out the strategic targets for waste management in the region and sets a specific target for C&D waste of "70% preparing for reuse, recycling and other recovery of construction and demolition waste" (excluding natural soils and stones and hazardous wastes) to be achieved by 2020.

The Draft NWMPCE does not dissolve the three regional waste areas. The NWCPCE sets the ambition of the plan to have a 0% total waste growth per person over the life of the Plan with an emphasis on non-household wastes including waste from commercial activities and the construction and demolition sector.

The draft NWMPCE sets out the following strategic target for waste management in the region that is relevant to the proposed development:

1b. (Construction Materials) 2% Reduction / year – Construction & Demolition Waste Generated.

Municipal landfill charges in Ireland are based on the weight of waste disposed. In the Leinster Region, charges are approximately €140 - €160 per tonne of waste which includes a €85 per tonne landfill levy introduced under the *Waste Management (Landfill Levy) (Amendment) Regulations 2015*.

The *Dublin City Development Plan 2022 – 2028*¹⁴ sets out a number of policies and objectives for Dublin City in line with the objectives of the National climate action policy and emphasises the need to take action to address climate action across all sectors of society and the economy. In the waste sector, policy on climate action is focused on a shift towards a 'circular economy' encompassing three core principles: designing out waste and pollution; keeping products and material in use; and regenerating natural systems. Further policies and objectives can be found within the draft development plan.

Policies:

- *CA8 F: minimising the generation of site and construction waste and maximising reuse or recycling.*
- *CA8 G: (New development should generally demonstrate/ provide for:) the use of construction materials that have low to zero embodied energy and CO² emissions.*
- *CA22: The Circular economy: To support the shift towards the circular economy approach as set out in 'a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, or as updated.*
- *CA23: To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.*
- *SI27: Sustainable Waste Management: To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.*
- *SI29: Segregated Storage and Collection of Waste Streams: To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate.*
- *SI30: To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).*

Objectives:

- *SI014 Local Recycling Infrastructure: To provide for a citywide network of municipal civic amenity facilities/ multi-material public recycling and reuse*

facilities in accessible locations throughout the city in line with the objectives of the circular economy and 15 minute city.

- *SIO16 Eastern-Midlands Region Waste Management Plan: To support the implementation of the Eastern-Midlands Regional Waste Management Plan 2015–2021 and any subsequent plans in order to facilitate the transition from a waste management economy towards a circular economy.*

15.7.1 Re-use of Existing Buildings

Where development proposal comprises of existing buildings on the site, applicants are encouraged to reuse and repurpose the buildings for integration within the scheme, where possible in accordance with Policy CA5, CA6 and CA7. Where demolition is proposed, the applicant must submit a demolition justification report to set out the rationale for the demolition having regard to the ‘embodied carbon’ of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.

Existing building materials should be incorporated and utilised in the new design proposals where feasible and a clear strategy for the reuse and disposal of the materials should be included where demolition is proposed.

2.3 Legislative Requirements

The primary legislative instruments that govern waste management in Ireland and applicable to the project are:

- Waste Management Act 1996 as amended.
- Environmental Protection Act 1992 as amended.
- Litter Pollution Act 1997 as amended.
- Planning and Development Act 2000 as amended ¹⁵, and
- Circular Economy and Miscellaneous Provisions Act 2022.

One of the guiding principles of European waste legislation, which has in turn been incorporated into the *Waste Management Act 1996* as amended and subsequent Irish legislation, is the principle of “*Duty of Care*”. This implies that the waste producer is responsible for waste from the time it is generated through until its legal recycling, recovery or disposal (including its method of disposal). As it is not practical in most cases for the waste producer to physically transfer all waste from where it is produced to the final destination, waste contractors will be employed to physically transport waste to the final destination. Following on from this is the concept of “*Polluter Pays*” whereby the waste producer is liable to be prosecuted for pollution incidents, which may arise from the incorrect management of waste produced, including the actions of any contractors engaged (e.g. for transportation and disposal/recovery/recycling of waste).

It is therefore imperative that the developer ensures that the waste contractors engaged by demolition and construction contractors are legally compliant with respect to waste transportation, recycling, recovery and disposal. This includes the requirement that a contractor handle, transport and recycle/recover/dispose of waste in a manner that ensures that no adverse environmental impacts occur as a result of any of these activities.

A collection permit to transport waste must be held by each waste contractor which is issued by the National Waste Collection Permit Office (NWCPO). Waste receiving

facilities must also be appropriately permitted or licensed. Operators of such facilities cannot receive any waste, unless in possession of a Certificate of Registration (COR) or waste permit granted by the relevant Local Authority under the *Waste Management (Facility Permit & Registration) Regulations 2007 and Amendments* or a waste or IE licence granted by the EPA. The COR/permit/licence held will specify the type and quantity of waste able to be received, stored, sorted, recycled, recovered and/or disposed of at the specified site.

3.0 Design Approach

The client and the design team have integrated the '*Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects*' guidelines into the design workshops, to help review processes, identify and evaluate resource reduction measures and investigate the impact on cost, time, quality, buildability, second life and management post demolition and construction. Further details on these design principals can be found within the aforementioned guidance document.

The design team have undertaken the design process in line with the international best practice principles to firstly prevent wastes, reuse where possible and thereafter sustainably reduce and recover materials. The below sections have been the focal point of the design process and material selections and will continued to be analysed and investigated throughout the design process and when selecting material.

As noted in the EPA guidelines, the approaches presented are based on international principles of optimising resources and reducing waste on construction projects through:

- Prevention;
- Reuse;
- Recycling;
- Green Procurement Principles;
- Off-Site Construction;
- Materials Optimisation; and
- Flexibility and Deconstruction.

3.1 Designing For Prevention, Reuse and Recycling

Undertaken at the outset and during project feasibility and evaluation the Client and Design Team considered:

- Establishing the potential for any reusable site assets (buildings, structures, equipment, materials, soils, etc.);
- The potential for refurbishment and refit of existing structures or buildings rather than demolition and new build;
- Assessing any existing buildings on the site that can be refurbished either in part or wholly to meet the Client requirements; and
- Enabling the optimum recovery of assets on site.

3.2 Designing for Green Procurement

Waste prevention and minimisation pre-procurement have been discussed and will be further discussed in this section. The Design Team will discuss proposed design solutions, encourage innovation in tenders and incentivise competitions to recognise sustainable approaches. They will also discuss options for packaging reduction with

the main Contractor and subcontractors/suppliers using measures such as 'Just-in-Time' delivery and use ordering procedures that avoid excessive waste. The Green procurement extends from the planning stage into the detailed design and tender stage and will be an ongoing part of the long-term design and selection process for this development.

3.3 Designing for Off-Site Construction

Use of off-site manufacturing has been shown to reduce residual wastes by up to 90% (volumetric building versus traditional). The decision to use offsite construction is typically cost led but there are significant benefits for resource management. Some further considerations for procurement which are being investigated as part of the planning stage design process are listed as follows:

- Modular buildings as these can displace the use of concrete and the resource losses associated with concrete blocks such as broken blocks, mortars, etc.;
 - Modular buildings are typically pre-fitted with fixed plasterboard and installed insulation, eliminating these residual streams from site.
- Use of pre-cast structural concrete panels which can reduce the residual volumes of concrete blocks, mortars, plasters, etc.;
- The use of prefabricated composite panels for walls and roofing to reduce residual volumes of insulation and plasterboards;
- Using pre-cast hollow-core flooring instead of in-situ ready mix flooring or timber flooring to reduce the residual volumes of concrete/formwork and wood/packaging, respectively; and
- Designing for the preferential use of offsite modular units.

3.4 Designing for Materials Optimisation During Construction

To ensure manufacturers and construction companies adopt lean production models, including maximising the reuse of materials onsite. This helps to reduce the environmental impacts associated with transportation of materials and from waste management activities. This includes investigating the use of standardised sizes for certain materials to help reduce the amount of offcuts produced on site, focusing on promotion and development of off-site manufacture.

3.5 Designing for Flexibility and Deconstruction

Design flexibility has and will be investigated throughout the design process to ensure that where possible products (including buildings) only contain materials that can be recycled and are designed to be easily disassembled. Material efficiency is being considered for the duration and end of life of a building project to produce; flexible, adaptable spaces that enable a resource-efficient, low-waste future change of use; durability of materials and how they can be recovered effectively when maintenance and refurbishment are undertaken and during disassembly/deconstruction.

4.0 DESCRIPTION OF THE PROJECT

4.1 Location, Size and Scale of the Development

The proposed development provides for the demolition of the existing building and construction of a new building ranging in height from 9 no. to 17 no. storeys over lower ground floor and double basement comprising of office accommodation, arts/community/cultural uses and a retail/café/restaurant unit. Office accommodation is provided from lower ground floor to 15th floor level, arts/community/cultural uses

are provided at lower ground, ground, 1st and 16th floor level with a retail/café/restaurant unit at ground floor level. Landscaped terraces are located at 8th, 9th, 10th, 11th, 15th, 16th floor level with winter terraces located at 4th, 6th 9th floor level. Provision of a new landscaped street to the east of the building to include external arts/community/cultural uses. The double basement comprises 30 no. car parking spaces, 923 no. bicycle parking spaces and 6 no. motorbike spaces as well as shower/changing facilities and plantroom.

The site is located in the Dublin Docklands and is within walking distance to Dublin City Centre and to the main areas including the Grafton Street to the south west, and O'Connell Street to the west. The site has direct access onto the Quays and is located c. 400 m to the east of the Custom's House.

The site is in close proximity to both Connolly Station and Tara Street Station, which are major commuter rail stations serving the Greater Dublin Area. The subject site is also east of the proposed MetroLink Tara station. The site is located a short distance south of the Red Line Luas cross city stop's George's Dock and Mayor Square – National College of Ireland and close to the numerous bus routes and planned BusConnects routes.

The River Liffey is located immediately south from the Proposed Development site.

The below Figure 4.1 presents the proposed development lands (hereafter referred to as "the site") shown by the indicative red line boundary.

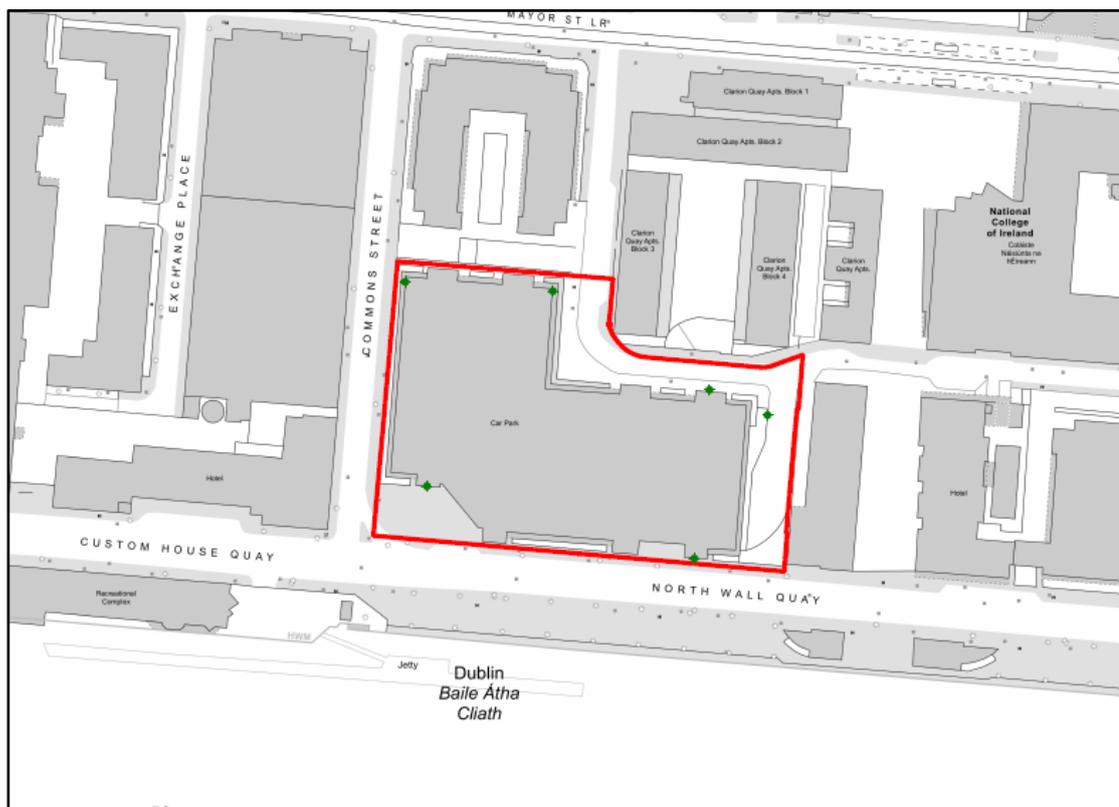


Figure 4.1 Proposed Development Lands (indicative site boundary) (Source: 1NWQ-HJL-AX-00-DR-A-0001).

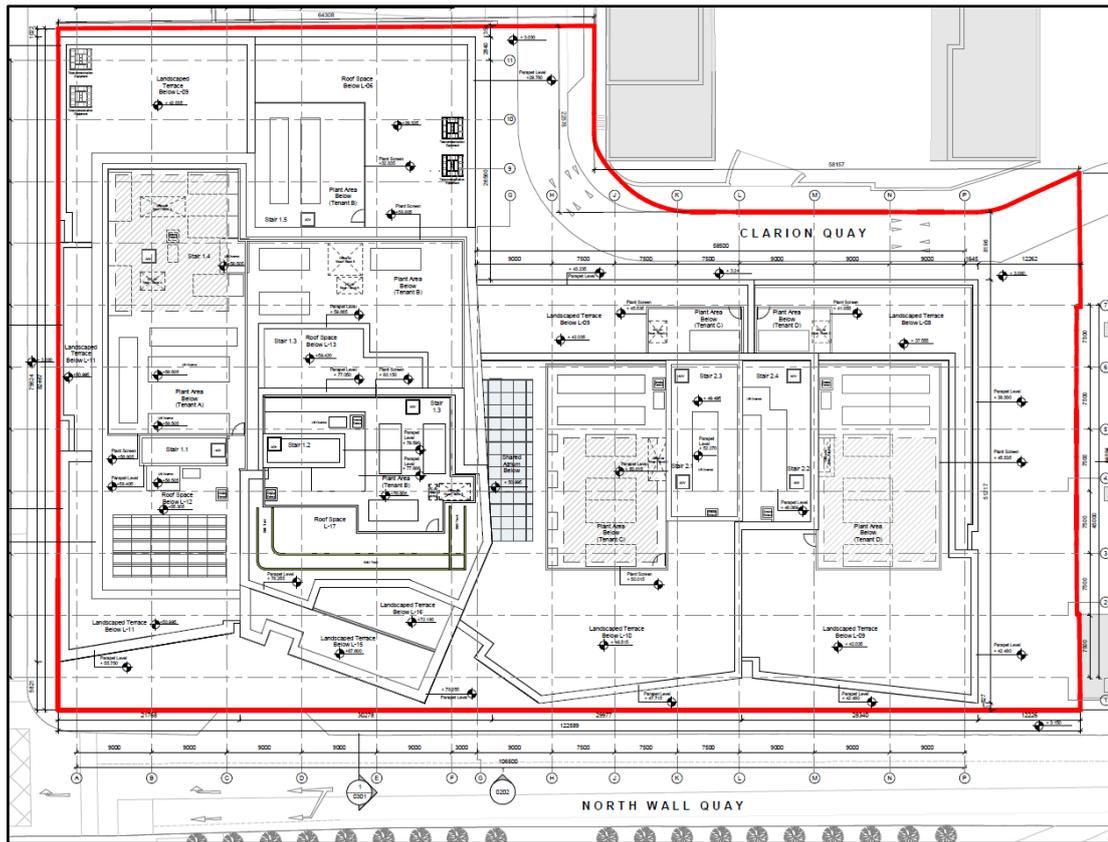


Figure 4.2 Proposed Site Layout for the Proposed Development (HJL 1NWQ-HJL-AX-17-DR-A-0117)

4.2 Details of the Non-Hazardous Wastes to be Produced

There will be waste materials generated from the demolition of the existing office building structure, hardstanding areas, existing basement and excavation of services.

The volume of waste generated from demolition will be more difficult to segregate than waste generated from the construction phase, as the building materials will be integrated i.e. steel embedded in concrete.

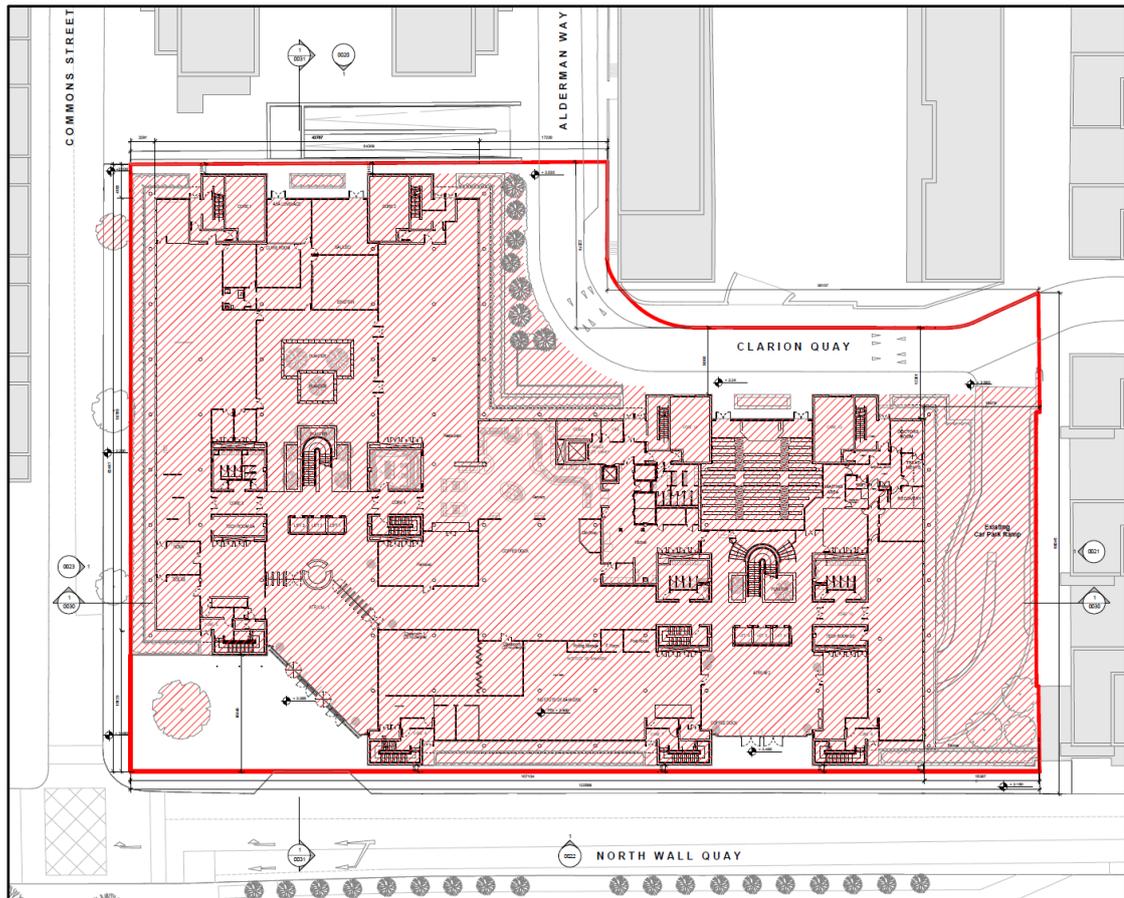


Figure 4.3 General Location of Demolition Works - Ground Floor of existing Building

There will be soil, stones and clay to facilitate construction of new foundations, and the installation of underground services and the proposed basements. The project Quantity surveyors (Linesite) have estimated c. 120,000m³ of material will need to be excavated. It is currently envisaged that all the excavated material, will need to be removed offsite due to the limited opportunities for reuse on site. When material is to be removed offsite it will be taken for appropriate offsite reuse, recovery, recycling and/or disposal.

During the construction phase there may be a surplus of building materials, such as timber off-cuts, broken concrete blocks, cladding, plastics, metals and tiles generated. There may also be excess concrete during construction which will need to be disposed of. Plastic and cardboard waste from packaging and supply of materials will also be generated. The contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

Waste will also be generated from demolition and construction workers e.g. organic/food waste, dry mixed recyclables (waste paper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables and potentially sewage sludge from temporary welfare facilities provided on site during the construction phase. Waste printer/toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices.

4.3 Potential Hazardous Wastes Arising

4.3.1 Contaminated Soil

The site is currently occupied by an existing, in use office development and it is not currently possible to undertake site investigations or environmental soil testing. Prior to any excavated material being removed from site investigations and environmental soil testing will be undertaken.

If any potentially contaminated material is encountered, it will need to be segregated from clean/inert material, tested and classified as either non-hazardous or hazardous in accordance with the EPA publication entitled '*Waste Classification: List of Waste & Determining if Waste is Hazardous or Non-Hazardous*'¹⁶ using the *HazWasteOnline* application (or similar approved classification method). The material will then need to be classified as clean, inert, non-hazardous or hazardous in accordance with the *EC Council Decision 2003/33/EC*¹⁷, which establishes the criteria for the acceptance of waste at landfills.

In the event that Asbestos containing materials (ACMs) are found, the removal will only be carried out by a suitably permitted waste contractor, in accordance with *S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010*. All asbestos will be taken to a suitably licensed or permitted facility.

In the event that hazardous soil, or historically deposited waste is encountered during the construction phase, the contractor will notify DCC and provide a Hazardous/Contaminated Soil Management Plan, to include estimated tonnages, description of location, any relevant mitigation, destination for disposal/treatment, in addition to information on the authorised waste collector(s).

4.3.2 Fuel/Oils

Fuels and oils are classed as hazardous materials; any on-site storage of fuel/oil, and all storage tanks and all draw-off points will be bunded and located in a dedicated, secure area of the site. Provided that these requirements are adhered to, and the site crew are trained in the appropriate refuelling techniques, it is not expected that there will be any fuel/oil waste generated at the site.

4.3.3 Invasive Plant Species

The project ecologist (Altemar) undertook a site assessment/survey searching directly for evidence of Japanese Knotweed (*Fallopia japonica*) and other invasive species. This included a walkover survey of the entire site, and around part of the outside perimeter. No Knotweed plant species were recorded inside the site boundary.

Japanese Knotweed is an alien invasive species listed under *Schedule 3 of Regulations SI No. 355/2015*. The project ecologist concluded that it is not present on this site.

4.3.4 Asbestos

Prior to the demolition of any structures onsite a demolition asbestos survey will be undertaken by an appropriately qualified specialists for the purpose of identifying an asbestos or Asbestos Containing Materials (ACM). As the current building was not constructed until 1998-2000 it is unlikely that asbestos or ACMs will be encountered.

If ACMs are detected on site, the removal of asbestos or ACMs will be carried out by a suitably qualified contractor and ACMs will only be removed from site by a suitably permitted/licenced waste contractor. in accordance with the *Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010*. All material will be taken to a suitably licensed or permitted facility.

4.3.5 Other known Hazardous Substances

Paints, glues, adhesives and other known hazardous substances will be stored in designated areas. They will generally be present in small volumes only and associated waste volumes generated will be kept to a minimum. Wastes will be stored in appropriate receptacles pending collection by an authorised waste contractor.

In addition, WEEE (containing hazardous components), printer toner/cartridges, batteries (Lead, Ni-Cd or Mercury) and/or fluorescent tubes and other mercury containing waste may be generated from during C&D activities or temporary site offices. These wastes, if generated, will be stored in appropriate receptacles in designated areas of the site pending collection by an authorised waste contractor.

5.0 Roles and Responsibilities

The *Best Practice Guidelines on the Preparation of Resource Waste Management Plans for Construction and Demolition Projects* promotes that a RM should be appointed. The RM may be performed by number of different individuals over the life-cycle of the Project, however it is intended to be a reliable person chosen from within the Planning/Design/Contracting Team, who is technically competent and appropriately trained, who takes the responsibility to ensure that the objectives and measures within the Project RWMP are complied with. The RM is assigned the requisite authority to meet the objective and obligations of the RWMP. The role will include the important activities of conducting waste checks/audits and adopting construction and demolition methodology that is designed to facilitate maximum reuse and/or recycling of waste.

5.1 Role of the Client

The Client are the body establishing the aims and the performance targets for the project.

- The Client has commissioned the preparation and submission of this RWMP as part of the design and planning submission;
- The Client is to commission the preparation and submission of an updated RWMP as part of the demolition and construction tendering process;
- The Client will ensure that the RWMP is agreed on and submitted to the local authority and their agreement obtained prior to commencement of works on site;
- The Client will request the end-of-project RWMP from the Contractor.

5.2 Role of the Client Advisory Team

The Client Advisory Team or Design Team is formed of architects, consultants, quantity surveyors and engineers and is responsible for:

- Drafting and maintaining the RWMP through the design, planning and procurement phases of the project;

- Appointing a RM to track and document the design process, inform the Design Team and prepare the RWMP.
- Including details and estimated quantities of all projected waste streams with the support of environmental consultants/scientists. This will also include data on waste types (e.g. waste characterisation data, contaminated land assessments, site investigation information) and prevention mechanisms (such as by-products) to illustrate the positive circular economy principles applied by the Design Team;
- Managing and valuing the demolition work with the support of quantity surveyors;
- Handing over of the RWMP to the selected Contractor upon commencement of demolition and construction phases of the development, in a similar fashion to how the safety file is handed over to the Contractor;
- Working with the Contractor as required to meet the performance targets for the project.

5.3 Future Role of the Contractor

The future C&D contractors have not yet been decided upon for this RWMP. However, once select they will have major roles to fulfil. They will be responsible for:

- Preparing, implementing and reviewing the (including the Pre-Demolition) RWMP throughout the demolition and construction phases (including the management of all suppliers and sub-contractors) as per the requirements of the EPA guidelines;
- Identifying a designated and suitably qualified RM who will be responsible for implementing the RWMP;
- Identifying all hauliers to be engaged to transport each of the resources / wastes off-site;
- Implementing waste management policies whereby waste materials generated on site are to be segregated as far as practicable;
- Renting and operating a mobile-crusher to crush concrete for temporary reuse onsite during demolition and construction to reduce the amount of HGV loads required to remove material from site;
- Applying for the appropriate waste permit to crush concrete onsite;
- Identifying all destinations for resources taken off-site. As above, any resource that is legally classified as a 'waste' must only be transported to an authorised waste facility;
- End-of-waste and by-product notifications addressed with the EPA where required;
- Clarification of any other statutory waste management obligations, which could include on-site processing;
- Full records of all resources (both wastes and other resources) will be maintained for the duration of the project; and
- Preparing a RWMP Implementation Review Report at project handover.

6.0 Key Materials & Quantities

6.1 Project Resource Targets

Project specific resource and waste management targets for the site have not yet been set and this information should be updated for these targets once these targets have been confirmed by the client. However, it is expected for projects of this nature that a minimum of 70% of waste is fully re-used, recycled or recovered. Target setting

will inform the setting of project-specific benchmarks to track target progress. Typical Key Performance Indicators (KPIs) that may be used to set targets include (as per guidelines):

- Weight (tonnes) or Volume (m³) of waste generated per construction value;
- Weight (tonnes) or Volume (m³) of waste generated per construction floor area (m²);
- Fraction of resource reused on site;
- Fraction of resource notified as by-product;
- Fraction of waste segregated at source before being sent off-site for recycling/recovery; and
- Fraction of waste recovered, fraction of waste recycled, or fraction of waste disposed.

6.2 Main Construction Waste Categories

The main non-hazardous and hazardous waste streams that could be generated by the demolition and construction activities at a typical site are shown in Table 6.1. The List of Waste (LoW) code (2018) for each waste stream is also shown.

Table 6.1 Typical waste types generated and LoW codes (individual waste types may contain hazardous substances)

Waste Material	LoW Code
Concrete, bricks, tiles, ceramics	17 01 01-03 & 07
Wood, glass and plastic	17 02 01-03
Treated wood, glass, plastic, containing hazardous substances	17-02-04*
Bituminous mixtures, coal tar and tarred products	17 03 01*, 02 & 03*
Metals (including their alloys) and cable	17 04 01-11
Soil and stones	17 05 03* & 04
Gypsum-based construction material	17 08 01* & 02
Paper and cardboard	20 01 01
Mixed C&D waste	17 09 04
Green waste	20 02 01
Electrical and electronic components	20 01 35 & 36
Batteries and accumulators	20 01 33 & 34
Liquid fuels	13 07 01-10
Chemicals (solvents, pesticides, paints, adhesives, detergents etc.)	20 01 13, 19, 27-30
Insulation materials	17 06 04
Organic (food) waste	20 01 08
Mixed Municipal Waste	20 03 01

* individual waste type may contain hazardous substances

7.0 WASTE MANAGEMENT

7.1 Demolition Waste Generation

There will be waste materials generated from the demolition of the existing office building structure, hardstanding areas, existing basement and excavation of services on site to accommodate the new development and facilitation works.

The demolition areas are identified in the planning drawings provided with the planning application. The anticipated demolition waste and rates of reuse, recycling / recovery and disposal are shown in Table 7.1 below.

Table 7.1 Estimated off-site reuse, recycle and disposal rates for demolition waste

Waste Type	Tonnes	Reuse		Recycle / Recovery		Disposal	
		%	Tonnes	%	Tonnes	%	Tonnes
Glass	790.0	0	0.0	85	671.5	15	118.5
Concrete, Bricks, Tiles, Ceramics	5178.7	30	1553.6	65	3366.2	5	258.9
Plasterboard	351.1	0	0.0	80	280.9	20	70.2
Asphalts	87.8	0	0.0	25	21.9	75	65.8
Metals	1316.6	5	65.8	80	1053.3	15	197.5
Timber	1053.3	10	105.3	40	421.3	50	526.7
Total	8777.5	19.65	1724.8	66.25	5815.1	14.1	1237.6

7.2 Construction Waste Generation

The below Table 7.1 shows the breakdown of C&D waste types produced on a typical site based on data from the EPA *National Waste Reports*¹⁸ and the joint EPA & GMIT study¹⁹, along with other research reports.

Table 7.1: Waste materials generated on a typical Irish construction site.

Waste Types	%
Mixed C&D	33
Timber	28
Plasterboard	10
Metals	8
Concrete	6
Other	15
Total	100

The Table 7.2 below shows the estimated construction waste generation for the development based on the gross floor area of construction and other information available to date, along with indicative targets for management of the waste streams. The estimated waste amounts for the main waste types (with the exception of soils and stones) are based on an average large-scale development waste generation rate per m², using the waste breakdown rates shown in Table 7.1. These have been calculated from the schedule of development areas provided by the architect.

Table 7.2: Predicted on and off-site reuse, recycle and disposal rates for construction waste

Waste Type	Total Waste	Reuse		Recycle/Recovery		Disposal	
	Tonnes	%	Tonnes	%	Tonnes	%	Tonnes
Mixed C&D	1500.0	10	150.0	80	1200.0	10	150.0
Timber	1272.7	40	509.1	55	700.0	5	63.6
Plasterboard	454.5	30	136.4	60	272.7	10	45.5
Metals	363.6	5	18.2	90	327.3	5	18.2

Concrete	272.7	30	81.8	65	177.3	5	13.6
Other	681.8	20	136.4	60	409.1	20	136.4
Total	4545.4		1031.8		3086.4		427.3

In addition to the information in Table 7.3, there will be 120,000m³ of soil, stones and clay excavated to facilitate construction of new foundations, underground services, and the installation of the proposed basement. Any suitable excavated material will be temporarily stockpiled for reuse as fill, where possible, but reuse on site is expected to be limited and all of the excavated material is expected to be removed offsite for appropriate reuse, recovery and/or disposal.

It should be noted that when final materials and detailed construction methodologies have been confirmed the RWMP will be updated in line with EPA guidelines on RWMPs. Currently it is difficult to predict with a high level of accuracy the construction waste that will be generated from the proposed works as the exact materials and quantities may be subject to some degree of change and variation during the detailed design and construction process depending on advances in technology and availability of products.

7.3 Proposed Resource and Waste Management Options

Waste materials generated will be segregated on site, where it is practical. Where the on-site segregation of certain wastes types is not practical, off-site segregation will be carried out. There will be skips and receptacles provided to facilitate segregation at source where feasible. All waste receptacles leaving site will be covered or enclosed. The appointed waste contractor will collect and transfer the wastes as receptacles are filled. There are numerous waste contractors in the Dublin Region that provide this service.

All waste arising's will be handled by an approved waste contractor holding a current waste collection permit. All waste arising's requiring disposal off-site will be reused, recycled, recovered or disposed of at a facility holding the appropriate registration, permit or licence, as required.

National End-of-Waste Decision EoW-N001/2023 (Regulation 28) establishes criteria determining when recycled aggregate resulting from a recovery operation ceases to be waste. Material from this proposed development will be investigated to see if it can cease to be a waste under the requirements of the National End of Waste Criteria for Aggregates.

During demolition and construction phases, some of the sub-contractors on site will generate waste in relatively low quantities. The transportation of non-hazardous waste by persons who are not directly involved with the waste business, at weights less than or equal to 2 tonnes, and in vehicles not designed for the carriage of waste, are exempt from the requirement to have a waste collection permit (Ref. Article 30 (1) (b) of the Waste Collection Permit Regulations 2007 as amended). Any sub-contractors engaged that do not generate more than 2 tonnes of waste at any one time can transport this waste offsite in their work vehicles (which are not design for the carriage of waste). However, they are required to ensure that the receiving facility has the appropriate COR / permit / licence.

Written records will be maintained by the contractor(s) detailing the waste arising throughout the C&D phases, the classification of each waste type, waste collection permits for all waste contactors who collect waste from the site and COR/permit or

licence for the receiving waste facility for all waste removed off site for appropriate reuse, recycling, recovery and/or disposal

Dedicated bunded storage containers will be provided for hazardous wastes which may arise such as batteries, paints, oils, chemicals etc, if required.

The anticipated management of the main waste streams is outlined as follows:

Soil, Stone and Clay

The waste hierarchy states that the preferred option for waste management is prevention and minimisation of waste, followed by preparing for reuse and recycling / recovery, energy recovery (i.e. incineration) and, least favoured of all, disposal. The excavations are required to facilitate construction works so the preferred option (prevention and minimisation) cannot be accommodated for the excavation phase.

When material is removed off-site it could be reused as a by-product (and not as a waste). If this is done, it will be done in accordance with Regulation 27 (By-products), as amended, of S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2011-2020, (Previously Article 27 of the European Communities (Waste Directive), which requires that certain conditions are met and that by-product notifications are made to the EPA via their online notification form. Excavated material should not be removed from site until approval from the EPA has been received. The potential to reuse material as a by-product will be confirmed during the course of the excavation works, with the objective of eliminating any unnecessary disposal of material.

The next option (beneficial reuse) may be appropriate for the excavated material, pending environmental testing to classify the material as hazardous or non-hazardous in accordance with the EPA *Waste Classification – List of Waste & Determining if Waste is Hazardous or Non-Hazardous* publication. Clean inert material may be used as fill material in other construction projects or engineering fill for waste licensed sites. Beneficial reuse of surplus excavation material as engineering fill may be subject to further testing to determine if materials meet the specific engineering standards for their proposed end use.

Any nearby sites requiring clean fill/capping material will be contacted to investigate reuse opportunities for clean and inert material. If any of the material is to be reused on another site as a by-product (and not as a waste), this will be done in accordance with Regulation 27. Similarly, if any soils/stones are imported onto the site from another construction site as a by-product, this will also be done in accordance with Regulation 27. Regulation 27 will be investigated to see if the material can be imported onto this site for beneficial reuse instead of using virgin materials.

If the material is deemed to be a waste, then removal and reuse / recovery / disposal of the material will be carried out in accordance with the *Waste Management Act 1996* as amended, the *Waste Management (Collection Permit) Regulations 2007* as amended and the *Waste Management (Facility Permit & Registration) Regulations 2007* as amended. Once all available beneficial reuse options have been exhausted, the options of recycling and recovery at waste permitted and licensed sites will be considered.

In the event that contaminated material is encountered and subsequently classified as hazardous, this material will be stored separately to any non-hazardous material. It will require off-site treatment at a suitable facility or disposal abroad via Transfrontier Shipment of Wastes (TFS).

Bedrock

While it is not envisaged that bedrock will be encountered, if bedrock is encountered, it is anticipated that it will not be crushed on site. Any excavated rock is expected to be removed offsite for appropriate reuse, recovery and/or disposal. If bedrock is to be crushed onsite the appropriate mobile waste facility permit will be obtained from DCC.

Silt & Sludge

During the construction phase, silt and petrochemical interception should be carried out on runoff and pumped water from site works, where required. Sludge and silt will then be collected by a suitably licensed contractor and removed offsite.

Concrete Blocks, Bricks, Tiles & Ceramics

The majority of concrete blocks, bricks, tiles and ceramics generated as part of the construction works are expected to be clean, inert material and should be recycled, where possible. If concrete is to be crushed onsite the appropriate mobile waste facility permit will be obtained from DCC.

Hard Plastic

As hard plastic is a highly recyclable material, much of the plastic generated will be primarily from material off-cuts. All recyclable plastic will be segregated and recycled, where possible.

Timber

Timber that is uncontaminated, i.e. free from paints, preservatives, glues etc., will be disposed of in a separate skip and recycled off-site.

Metal

Metals will be segregated where practical and stored in skips. Metal is highly recyclable and there are numerous companies that will accept these materials.

Plasterboard

There are currently a number of recycling services for plasterboard in Ireland. Plasterboard from the construction phases will be stored in a separate skip, pending collection for recycling. The site manager will ensure that oversupply of new plasterboard is carefully monitored to minimise waste.

Glass

Glass materials will be segregated for recycling, where possible.

Waste Electrical and Electronic Equipment (WEEE)

Any WEEE will be stored in dedicated covered cages/receptacles/pallets pending collection for recycling.

Other Recyclables

Where any other recyclable wastes such as cardboard and soft plastic are generated, these will be segregated at source into dedicated skips and removed off-site.

Non-Recyclable Waste

C&D waste which is not suitable for reuse or recovery, such as polystyrene, some plastics and some cardboards, will be placed in separate skips or other receptacles. Prior to removal from site, the non-recyclable waste skip/receptacle will be examined by a member of the waste team (see Section 10.0) to determine if recyclable materials have been placed in there by mistake. If this is the case, efforts will be made to determine the cause of the waste not being segregated correctly and recyclable waste will be removed and placed into the appropriate receptacle.

Asbestos Containing Materials

Any asbestos or ACM found onsite will be removed by a suitably competent contractor and disposed of as asbestos waste before the works begin. All asbestos removal work or encapsulation work must be carried out in accordance with *S.I. No. 386 of 2006 Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations 2006-2010*.

Other Hazardous Wastes

On-site storage of any hazardous wastes produced (i.e. contaminated soil if encountered and/or waste fuels) will be kept to a minimum, with removal off-site organised on a regular basis. Storage of all hazardous wastes on-site will be undertaken so as to minimise exposure to on-site personnel and the public and to also minimise potential for environmental impacts. Hazardous wastes will be recovered, wherever possible, and failing this, disposed of appropriately.

Onsite Crushing

It is currently envisaged that the crushing of waste materials will occur on-site. Where the crushing of material is to be undertaken, a mobile waste facility permit will first be obtained from DCC and the destination of the accepting waste facility. If an application under regulation 28 is to be made using National End-of-Waste Decision EoW-N001/2023, this will be supplied to the DCC waste unit.

7.4 Tracking and Documentation Procedures for Off-Site Waste

All waste will be documented prior to leaving the site. Waste will be weighed by the contractor, either by weighing mechanism on the truck or at the receiving facility. These waste records will be maintained on site by the nominated project RM (see Section 10.0).

All movement of waste and the use of waste contractors will be undertaken in accordance with the *Waste Management Act 1996* as amended, *Waste Management (Collection Permit) Regulations 2007* as amended and *Waste Management (Facility Permit & Registration) Regulations 2007* and amended. This includes the requirement for all waste contractors to have a waste collection permit issued by the NWCPO. The nominated project RM (see Section 10.0) will maintain a copy of all waste collection permits on-site.

If the waste is being transported to another site, a copy of the Local Authority waste COR/permit or EPA Waste/IE Licence for that site will be provided to the nominated project RM (see Section 10.0). If the waste is being shipped abroad, a copy of the Transfrontier Shipping (TFS) notification document will be obtained from DCC (as the relevant authority on behalf of all local authorities in Ireland) and kept on-site along with details of the final destination (COR, permits, licences etc.). A receipt from the final destination of the material will be kept as part of the on-site waste management records.

All information will be entered in a waste management recording system to be maintained on site.

8.0 ESTIMATED COST OF WASTE MANAGEMENT

An outline of the costs associated with different aspects of waste management is outlined below. The total cost of C&D waste management will be measured and will take into account handling costs, storage costs, transportation costs, revenue from rebates and disposal costs.

8.1 Reuse

By reusing materials on site, there will be a reduction in the transport and recycle/recovery/disposal costs associated with the requirement for a waste contractor to take the material off-site.

Clean and inert soils, gravel, stones etc. which cannot be reused on site may be used as access roads or capping material for landfill sites etc. This material is often taken free of charge or a reduced fee for such purposes, reducing final waste disposal costs.

8.2 Recycling

Salvageable metals will earn a rebate which can be offset against the costs of collection and transportation of the skips.

Clean uncontaminated cardboard and certain hard plastics can also be recycled. Waste contractors will charge considerably less to take segregated wastes, such as recyclable waste, from a site than mixed waste.

Timber can be recycled as chipboard. Again, waste contractors will charge considerably less to take segregated wastes such as timber from a site than mixed waste.

8.3 Disposal

Landfill charges are currently at around €140 - €160 per tonne which includes a €85 per tonne landfill levy specified in the *Waste Management (Landfill Levy) Regulations 2015*. In addition to disposal costs, waste contractors will also charge a collection fee for skips.

Collection of segregated C&D waste usually costs less than municipal waste. Specific C&D waste contractors take the waste off-site to a licensed or permitted facility and, where possible, remove salvageable items from the waste stream before disposing of the remainder to landfill. Clean soil, rubble, etc. is also used as fill/capping material, wherever possible.

9.0 DEMOLITION PROCEDURES

There will be waste materials generated from the demolition of the existing office building structure, hardstanding areas, existing basement and excavation of services. The demolition areas are identified in the planning drawings submitted as part of the planning application. A formal demolition plan including safety procedures will be prepared by the demolition contractor. However, in general, the following sequence of works should be followed during the demolition stage:

Check for Hazards

Prior to commencing works, buildings and structures to be demolished will be checked for any likely hazards including asbestos, ACMs, electrical power lines or cables, gas reticulation systems, telecommunications, unsafe structures and fire / explosion hazards, e.g. combustible dust, chemical hazards, oil, fuels and contamination.

Removal of Components

All hazardous materials will be removed first. All components from within the buildings that can be salvaged will be removed next. This will primarily be comprised of metal; however, may also include timbers, doors, windows, wiring and metal ducting, etc.

Removal of Roofing

Steel roof supports, beams, etc., will be dismantled and taken away for recycling / salvage.

Excavation of Services, Demolition of Walls and Concrete

Services will be removed from the ground and the breakdown of walls will be carried out once all salvageable or reusable materials have been taken from the buildings. Finally, any existing foundations and hard standing areas will be excavated.

10.0 TRAINING PROVISIONS

A member of the demolition and construction teams will be appointed as the project RM to ensure commitment, operational efficiency and accountability during the C&D phases of the project.

10.1 Resource Manager Training and Responsibilities

The nominated RM will be given responsibility and authority to select a waste team if required, i.e. members of the site crew that will aid them in the organisation, operation and recording of the waste management system implemented on site. The RM will have overall responsibility to oversee, record and provide feedback to the client on everyday waste management at the site. Authority will be given to the RM to delegate responsibility to sub-contractors, where necessary, and to coordinate with suppliers, service providers and sub-contractors to prioritise waste prevention and material salvage.

The RM will be trained in how to set up and maintain a record keeping system, how to perform an audit and how to establish targets for waste management on site. The RM will also be trained in the best methods for segregation and storage of recyclable materials, have information on the materials that can be reused on site and be knowledgeable in how to implement this RWMP.

10.2 Site Crew Training

Training of site crew is the responsibility of the RM and, as such, a waste training program should be organised. A basic awareness course will be held for all site crew to outline the RWMP and to detail the segregation of waste materials at source. This may be incorporated with other site training needs such as general site induction, health and safety awareness and manual handling.

This basic course will describe the materials to be segregated, the storage methods and the location of the Waste Storage Areas (WSAs). A sub-section on hazardous

wastes will be incorporated into the training program and the particular dangers of each hazardous waste will be explained.

11.0 TRACKING AND TRACING / RECORD KEEPING

Records should be kept for all waste material which leaves the site, either for reuse on another site, recycling or disposal. A recording system will be put in place to record the waste arising's on site.

A waste tracking log should be used to track each waste movement from the site. On exit from the site the waste collection vehicle driver should stop at the site office and sign out as a visitor and provide the security personnel or RM with a waste docket (or WTF for hazardous waste) for the waste load collected. At this time, the security personnel should complete and sign the Waste Tracking Register with the following information:

- Date
- Time
- Quantity
- Waste Contractor
- Company waste contractor appointed by e.g. Contractor or subcontractor name
- Collection Permit No.
- Vehicle Reg.
- Driver Name
- Docket No.
- Waste Type
- Quantity
- LoW

The waste vehicle will be checked by security personal or the RM to ensure it has the waste collection permit no. displayed and a copy of the waste collection permit in the vehicle before they are allowed to remove the waste from the site.

The waste transfer dockets will be transferred to the RM on a weekly basis and can be placed in the Waste Tracking Log file. This information will be forwarded onto the DCC Waste Regulation Unit when requested.

Each subcontractor that has engaged their own waste contractor will be required to maintain a similar waste tracking log with the waste dockets / WTF maintained on file and available for inspection on site by the main contractor as required. These subcontractor logs will be merged with the main waste log.

Waste receipts from the receiving waste facility will also be obtained by the site contractor(s) and retained. A copy of the Waste Collection Permits, CORs, Waste Facility Permits and Waste Licences will be maintained on site at all times and will be periodically reviewed by the RM. Subcontractors who have engaged their own waste contractors, should provide the main contractor with a copy of the waste collection permits and COR / permit / licence for the receiving waste facilities and maintain a copy on file, available for inspection on site as required.

12.0 OUTLINE WASTE AUDIT PROCEDURE

12.1 Responsibility for Waste Audit

The appointed RM will be responsible for conducting a waste audit at the site during the C&D phase of the development. Contact details for the nominated RM will be provided to the DCC Waste Regulation Unit after the main contractor is appointed and prior to any material being removed from site.

12.2 Review of Records and Identification of Corrective Actions

A review of all waste management costs and the records for the waste generated and transported off-site should be undertaken mid-way through the project.

If waste movements are not accounted for, the reasons for this should be established in order to see if and why the record keeping system has not been maintained. The waste records will be compared with the established recovery/reuse/recycling targets for the site. Each material type will be examined, in order to see where the largest percentage waste generation is occurring. The waste management methods for each material type will be reviewed in order to highlight how the targets can be achieved.

Upon completion of the C&D phase, a final report will be prepared, summarising the outcomes of waste management processes adopted and the total recycling/reuse/recovery figures for the development.

13.0 CONSULTATION WITH RELEVANT BODIES

13.1 Local Authority

Once demolition and construction contractors have been appointed, they have appointed waste contractors and prior to removal of any C&D waste materials offsite, details of the proposed destination of each waste stream will be provided to the DCC Waste Regulation Unit.

DCC will also be consulted, as required, throughout the demolition, excavation and construction phases in order to ensure that all available waste reduction, reuse and recycling opportunities are identified and utilised and that compliant waste management practices are carried out.

13.2 Recycling/Salvage Companies

The appointed waste contractor for the main waste streams managed by the demolition and construction contractors will be audited in order to ensure that relevant and up-to-date waste collection permits and facility registrations/permits/licences are held. In addition, information will be obtained regarding the feasibility of recycling each material, the costs of recycling/reclamation, the means by which the wastes will be collected and transported off-site, and the recycling/reclamation process each material will undergo off site.

13.3 Pest Management

A pest control operator will be appointed as required to manage pest onsite during the demolition and construction phases of the project. Organic and food wastes generated by staff will not be stored in open skips, but in closed waste receptacles. Any waste receptacles will be carefully managed to prevent leaks, odours and pest problems.

14.0 CONCLUSION

Adherence to this plan will also ensure that waste management during the demolition and construction phases, at the development are carried out in accordance with the requirements in the EPA's Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction & Demolition Projects and the DCC Waste Bye-Laws.

15.0 REFERENCES

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