

An opportunity Northern Ireland can't afford to waste

A review of the arc21 residual waste treatment project

June 2020



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Introduction and context

Grant Thornton considers the strategic operating context and current economic climate to conclude that the residual waste treatment project, as proposed by arc21 is an essential element of Northern Ireland's waste management plans and an enabler of economic development for Northern Ireland funded by foreign direct investment.

Northern Ireland (NI) faces a significant challenge to manage its waste in a more environmentally responsible and economically sustainable way. We produce approximately 1 million tonnes of household waste every year and of that around 50% or 500,000 tonnes is currently recycled. That leaves a requirement to manage the remaining 50%, approximately 500,000 tonnes.

In 2018/19, 281,226 tonnes of this council collected waste was landfilled and approximately 130,000 tonnes was exported to fuel Energy from Waste (EfW) facilities across Europe. This is both economically inefficient and environmentally unsustainable.

Northern Ireland policy makers - whilst acknowledging the principles of the revised Waste Framework Directive (WFD) - have historically framed their objectives stepwise. Firstly, by taking measures to see Northern Ireland's contribution to the UK obligation on the Landfill Directive (which was to limit harmful greenhouse gas emissions from landfill sites by requiring waste diversion elsewhere) via the NI Landfill Allowance Scheme. Then secondly, for NI to meet a UK wide recycling target of 50%.

This policy approach has resulted in prolonged landfilling here either directly or after some partial treatment and large volumes of waste being exported for energy recovery in Europe. This has effectively meant exporting additional Gross Value Added (GVA) while at the same time importing fossil fuel to balance the amount of energy that could be recovered from the waste exported, the majority of which is renewable in nature.

While such an approach is not inconsistent with the fundamental principles of the waste hierarchy, it is inherently limiting and increasingly unsustainable. Landfilling as a 21st century waste management option is not a legitimate long-term policy objective, not least because that route has been effectively extinguished by the EU Circular Economy Package (CEP) which has been adopted into UK law. The CEP has set an ambitious target of 65% recycling by 2035 and a maximum cap on landfill of 10%. Even if both targets are reached that still leaves an NI waste treatment capacity gap of between 50% and 25%.

While looking at the best ways of dealing with waste, Northern Ireland also must play its part in addressing climate change and in particular help reach the new Net Zero Carbon targets by 2050 agreed by the UK Government. The recent independent UK Committee on Climate Change (CCC) report¹ on Northern Ireland decarbonisation recognised that when it comes to waste, chief among the challenges here is to reduce methane emissions from landfill waste. Methane is 25 times more potent than CO₂ and accounts for over 95% of the total emissions from waste.

The CCC has recommended that Northern Ireland enforce a landfill ban on biodegradable material no later than 2025, ahead of the CEP mandated date of 2035. By 2030 the CEP requires a stricter observance of the waste hierarchy with waste only going to landfill if it is the best environmental outcome. The arc21 project has been conceived and developed to address these challenges.

¹ www.theccc.org.uk/publication/reducing-emissions-in-northern-ireland/



990,233

tonnes of municipal waste collected by NI councils in 2018/19



1,170kg

of waste generated per household



138,183 p.a.

average tonnes of waste exported to Europe over last 3 years

To outline the scale of the challenge across Europe, the European Confederation of Waste to Energy Plants (CEWEP) has calculated that even if the EU28 (including UK) achieve their ambitious CEP recycling and landfill targets, there will still be a European capacity gap of around 41m tonnes of residual waste left untreated by 2035². In this context, the importance of EfW infrastructure is clear.

“The lack of a support mechanism for EfW plants in Northern Ireland may restrict Northern Ireland’s ability to deal with increased diversion of Biodegradable Municipal Waste.

The arc21 judicial review...may negatively impact Northern Ireland’s ability to deal with waste diverted from landfill in the near term.”

UK Committee on Climate Change

To achieve these waste management and wider climate change targets it is clear that Northern Ireland needs to develop significant new waste management infrastructure that follows best practice across Europe.

In its waste management planning since 2004 arc21 the waste management group representing 6 councils on the east of Northern Ireland (serving 59% of the NI population) has taken the application of the waste hierarchy as the overarching principle which has guided its waste management planning. The arc21 councils anticipated the advent of the Circular Economy by over a decade and the need to minimise waste going to landfill while also maximising recycling. They recognised the need for strategic residual waste infrastructure such as that proposed in Mallusk to both increase recycling levels from council collected waste and maximise the value from the remaining non recyclable waste.

Meanwhile, the ‘New Decade, New Approach’ Agreement and the return of the Northern Ireland Executive has prompted necessary questions around public expenditure and finance in view of the Agreement’s ambitions.

The Agreement sets out the priorities for the Programme for Government (PfG) for 2020 and beyond and highlights the need to have a coordinated and strategic approach. The actions and interventions include:

- adopting an Energy Strategy that sets ambitious targets and actions for a fair and just transition to a zero-carbon society;
- adopting an Economic Strategy which will support clean and inclusive growth and create jobs as part of a Green New Deal;
- creating a plan to eliminate plastic pollution; and
- supporting a scheme that effectively cuts carbon emissions associated with heat energy.

This report examines how the proposed arc21 residual waste infrastructure project at Hightown Quarry can play its part in achieving each of these.

² www.cewep.eu/cewep-capacity-calculations/



Within days of the new Executive forming however, it was clear that the various initiatives were adding up to costs that are well beyond our current means. Even before the impact of COVID-19, a growing list of essential infrastructure works were challenging public finances.

As a consequence, Northern Ireland must consider new and innovative ways to ensure the effective delivery of public services in the face of many competing challenges.

The arc21 proposal

The arc21 proposal to create an integrated recycling and EfW facility forms a significant part of a sustainable and resilient solution.

The Becon Consortium has developed plans to build a state-of-the-art waste management facility at the Hightown Quarry site, Mallusk. Indaver, an experienced European waste management company, are the lead sponsor and the last remaining bidder in the ongoing public procurement. The project has a dedicated website at www.becon.co.uk.

This project represents a major investment for Northern Ireland – approximately £240 million in development and construction costs alone. A previous independent economic assessment by Oxford Economics estimates the project will employ over 300 workers during construction and will create/sustain 337 direct and indirect jobs annually when the facility is operational. The proposed construction expenditure is estimated³ to create or sustain 2,701 direct job years of employment.

The project is conceived with the public sector owning the land and treatment facilities at Hightown Quarry. The Becon Consortium, if successful in meeting all the requirements of the public procurement process and subject to democratic governance in the arc21 councils, would be the professional partner responsible for designing, constructing and commissioning and operating the facilities for arc21's constituent councils.

In this report, Grant Thornton considers the strategic operating context and current economic climate to conclude that the arc21 residual waste treatment project is an essential element of Northern Ireland's waste management plans and an enabler of economic development for Northern Ireland, funded by foreign direct investment.



LETTER TO CHANCELLOR

Eastwood in call for infrastructure cash

Murphy to delay budget in face of \$600m deficit

“The figures given to us by the British Secretary of State in relation to the financial package falls short of what was expected.”

Minister for Finance, Conor Murphy

3 www.becon.co.uk/assets/pdfs/Appendix%2016.1%20Oxford%20Economics.pdf



Household waste management in NI

Waste management best practice is based on the internationally recognised waste hierarchy which indicates an order of preference for action to reduce and manage waste. Waste prevention is the ideal outcome, with landfill being the least desirable. The latest European and UK Circular Economy targets have set a cap on landfill of 10% of municipal waste by 2035 with an ambitious recycling target of 65%.

In Northern Ireland we produce approximately 1 million tonnes of household waste every year. Of that around 50% or 500,000 tonnes of waste is recycled annually. That leaves a requirement to manage the remaining 50%, approximately 500,000 tonnes of residual waste per annum, the majority of which is currently not recyclable.



990,233

tonnes of municipal waste collected by NI councils in 2018/19



1,170kg

of waste generated per household

Source: NIEA NI local authority collected (LAC) waste management statistics 2018/19

Following processing elsewhere, some of this waste is treated at the Full Circle gasification facility in Belfast Harbour.

For the majority of the 1 million tonnes, the local authorities and the people of the arc21 area are currently dependent on either:

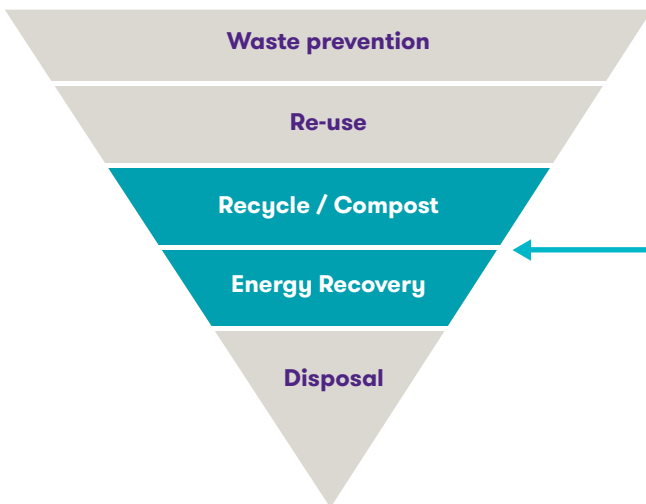
- exporting their waste to thermal treatment facilities abroad; or
- landfilling their waste in Northern Ireland. In 2018/19, 28% or 281,226 tonnes of council collected waste was landfilled.

The arc21 residual waste treatment project will have the capacity to treat up to **300,000 tonnes** of this waste annually, while recovering **recyclable materials and renewable energy**.

Environmental targets and illegality

Northern Ireland's waste management challenges are contributing to significant levels of illegality in the waste sector, which place a significant environmental and economic cost on NI. With an estimated 1m tonnes of illegal landfill, Mobuoy on the bank of the River Faughan, near Derry-Londonderry has been identified as the largest illegal landfill in Europe. The remediation could cost many millions. A review of waste disposal at the Mobuoy site and the lessons learnt for future regulation of the waste industry was carried out in 2013 and the subsequent 'Mills Report' recommended the need for 'large scale integrated waste treatment infrastructure', for Northern Ireland, infrastructure like that proposed by arc21⁴.

The Waste Hierarchy of Preferred Options



The Waste Hierarchy

The waste hierarchy aims to extract the maximum practical benefits from waste products and to generate the minimum amount of waste – starting with waste prevention and moving down to disposal.



The Becon project will support both the recycling and energy recovery aspects of the region's waste management strategy.

Currently exporting waste for treatment abroad



Landfilling waste is no longer a viable option



⁴ www.daera-ni.gov.uk/sites/default/files/publications/doe/waste-report-mills-review-10-dec-2013.pdf

Waste management infrastructure

A pressing need for sustainable and affordable waste management infrastructure.

The local economy has entered a particularly uncertain time. Even before Coronavirus COVID-19 plunged economic confidence into significantly negative territory, Brexit, and global trade uncertainty were placing downward pressure on Northern Ireland's economic prospects. As economic uncertainty gathers momentum, and consumers suffer ebbing confidence, there are increasing calls for government to step in to support economic growth through increased investment in service delivery and infrastructure. The importance of infrastructure is recognised in the Department of the Economy's 'Rebuilding a stronger economy' document which focuses on the medium term challenges of reopening the economy post Covid-19. While the new UK government has indicated a willingness to provide additional public expenditure and unleash an 'infrastructure revolution' the increasing and competing demands for public expenditure through a broad range of departments leave it uncertain as to whether projected increases in Northern Ireland's expenditure allocations will be sufficient to provide sustained multi-year investment programmes.

Northern Ireland runs a considerable deficit. While the level of deficit are a matter for some debate, the principle is not. Northern Ireland's net fiscal balance (the gap between total spending and revenue raised), is estimated by the Office for National Statistics at £9.4bn in 2018/19.

The Minister of Finance announced the headline expenditure figures for the 2020-21 financial year on 31st March 2020. While this budget reflected an 8% increase in real expenditure, it was recognized that expenditure next year is still below 'pre-austerity levels' of a decade ago. It was also evident from the NI budget that health, education and addressing COVID-19 are funding priorities and that funding for significant infrastructure investments remains to be found. As the economy endures and emerges from the impact of the virus, already stretched budgets will be required to support the survival of the business,

arts and cultural sectors. In addition to the obvious human tragedy, the repercussions of COVID-19 will extend far into how society and the economy functions. It is entirely feasible that decades of globalisation will come under review, supply chains could shorten, and countries strive to become less exposed and more self-reliant. For Northern Ireland, being able to manage our own waste would be consistent with a move towards greater self-sufficiency. And yet, the budgets to fund such a shift will be almost impossible to find.

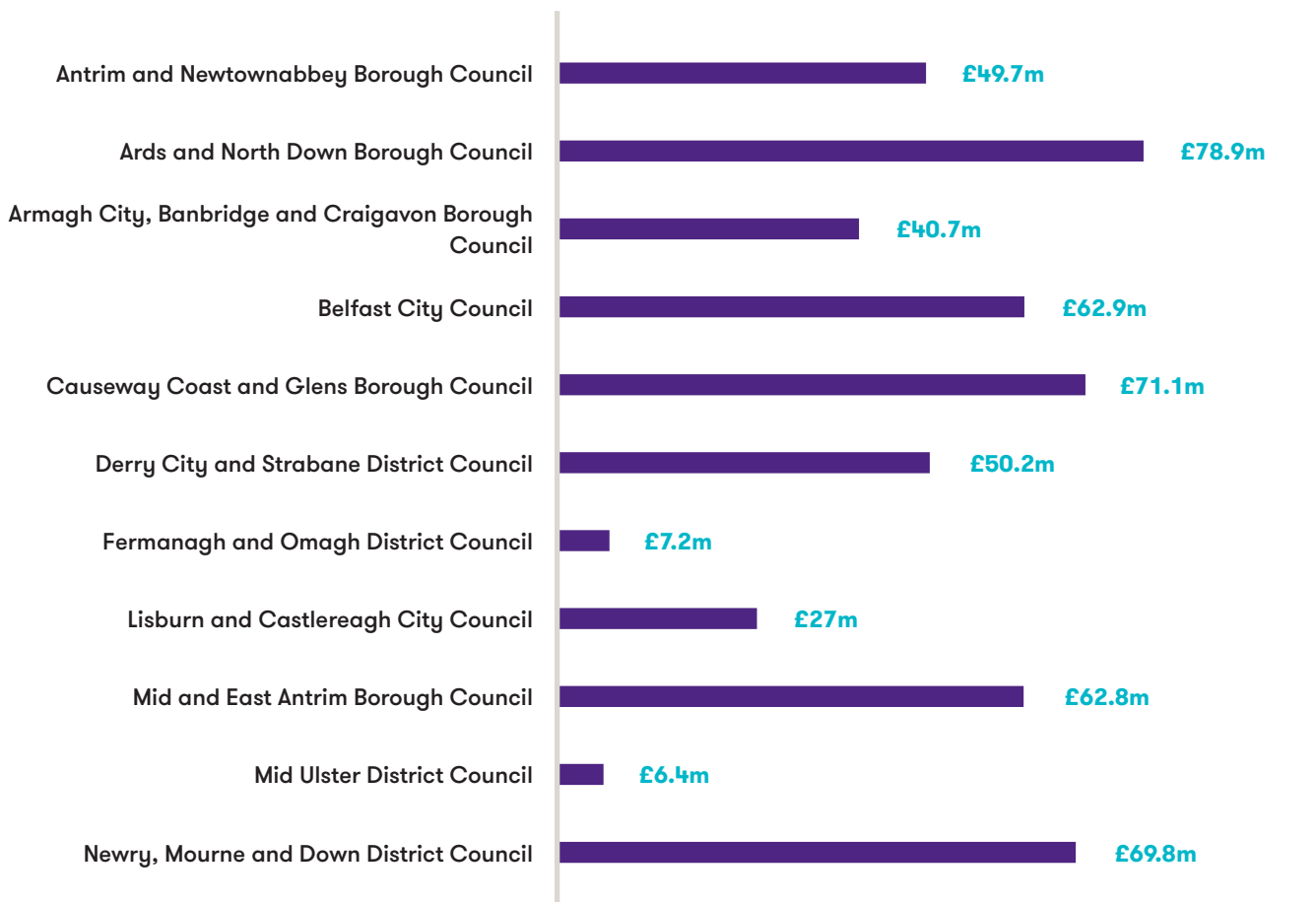
The pressures on public expenditure at Assembly and Executive level in Northern Ireland are mirrored at local council level. Analysis of each of the 11 councils' finances, taken from accounts for the 2018/19 financial year, shows that every one was in debt as of April 2019.

Combined, the arc21 member councils are over £350m in debt. While carrying debt is not unusual, the scale of debt across NI's councils has recently been called into question and the long-term implications for providing effective services to rate payers queried.

The COVID-19 crisis has contributed to a significant worsening of local government finances as rates and other incomes decline rapidly. Additional pressure on local government finances will come during the Covid-19 recovery phase as companies seek additional supports. If additional supports to businesses (such as rates reliefs) are not funded through Barnett formula additions to the block grant from Westminster, local councils here could fall over a financial cliff edge.

The arc21 project represents a **£240 million** injection of foreign direct investment in local infrastructure.

The total amount of debt for each NI council (April 2020)



Local government debt burdens highlight the need for councils to strive for efficient use of money. With regards to waste, which is estimated to account for 15-20% of annual council expenditure, relying on exporting significant tonnage each year in the medium to long term is sub-optimal as capacity decreases and costs increase.

There is also a significant opportunity cost in landfilling and exporting waste as NI foregoes the potential fuel and heat source waste can provide. It seems counter-intuitive to pay to export waste to EU member states where they benefit from the energy and heat source when security of energy supply is a genuine concern in NI. It is additionally illogical to export waste, given the additional carbon footprint impacts created from exporting.

Furthermore the European export market for receipt of Northern Ireland's waste is not guaranteed. For example, the Netherlands has introduced a tax of approximately €32 per tonne for imported waste, Sweden has also introduced a tax on imports. Other markets for NI's waste are equally capable of banning imports or imposing significant taxes. As was seen during the Covid 19 pandemic many countries – including European – will prioritise local needs.

The Strategic Investment Board for Northern Ireland in a report commissioned by DAERA has described the reliance on exporting residual waste as 'perverse'.⁵ This reflected the context where Northern Ireland is exporting waste as a renewable fuel which contributes to meeting renewable energy targets elsewhere in Europe whilst at the same time

importing fossil fuel to meet NI needs. Their report stated "... even setting aside the obligation to take due account of the Proximity Principle medium to long term reliance on export as a means of securing the environmental benefits associated with achieving EU compliance can be considered as a very high-risk approach."

Grant Thornton's view is that the costs of exporting waste for thermal treatment are significantly more likely to increase over time than decrease, thus raising the importance of Northern Ireland having a more sustainable long-term self-sufficient solution.

NI is still landfilling 281,226 tonnes of council collected waste. This will have to be reduced to a maximum of 10% of municipal waste by 2035 to c.100,000 tonnes per annum. Grant Thornton's analysis of landfill taxes and landfill 'gate fees' suggests that the average annual cost to NI councils over the past three years is more than £30m.

Grant Thornton further estimate the cost to NI councils of exporting household waste to be approximately £16m per annum based on an average of 138,183 tonnes over the past three years.

15 - 20% of council expenditure is on waste management. The arc21 facility will ensure councils are self sufficient and have a long-term, sustainable and resilient solution for their waste.

5 SIB (2015) Update of the (April 2012) Analysis of the 2020 Residual Waste Infrastructure Requirements in NI to meet EU Obligations

£16m p.a.
Estimated current cost to NI councils from exporting household waste



€32 per tonne
Tax applied to waste imports in key recipient market for NI waste - The Netherlands



£30m p.a.
Estimated current cost to NI councils from landfill taxes and gate fees



A compelling, mainstream solution

The need for residual waste infrastructure is set out in the arc21 waste management plan which is endorsed by the Department of Agriculture, Environment and Rural Affairs, and arc21's constituent councils who are democratically mandated to act on behalf of their residents. In response to the public procurement, launched in 2007/8, the Becon Consortium developed plans to co-locate the infrastructure displayed at Hightown Quarry, Mallusk, Co. Antrim.

Further details on the technology proposed as well as the planning application documents can be found at www.becon.co.uk.

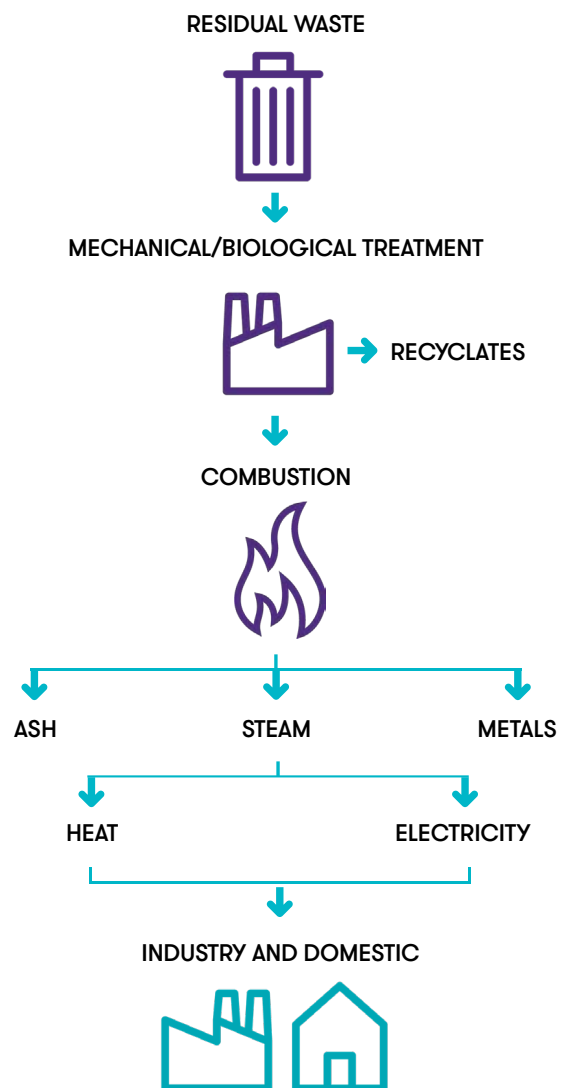
This project represents a major investment for Northern Ireland – approximately £240 million in development and construction alone. In the construction of the new waste facilities, local contractors will be used wherever possible, thereby maximising opportunities for employment and benefiting the wider local economy. An independent economic assessment estimates it will support 337 permanent direct and indirect jobs when the plants are operational.

The project will also provide numerous training opportunities and apprenticeships for young people during the construction and operational phases. It will provide local firms with experience in building and maintaining technologically advanced engineering systems that will improve their portfolios.

The scale of investment is on par with key capital projects such as the new Ulster University Greater Belfast development for a new campus and the Belfast Transport Hub, part of the Weaver's Cross development.

There will be a number of additional local community benefits including significant local road improvements and a visitor centre which will support local educational and community use. A community benefit fund will also be established, calculated on every tonne of waste processed at the facility.

The waste treatment process



Typically a project of this nature can be the anchor for other decarbonisation developments such as district heating, energy storage or hydrogen generation and distribution



The arc21 project utilises proven technology with decarbonisation benefits

The mechanical and biological treatment plant (MBT) is designed to extract valuable recyclates which will directly contribute to council recycling rates. The remaining material, unsuitable for recycling, is treated in the EfW facility and energy is recovered, consistent with the waste hierarchy principles.

The combination of an MBT facility for pre-treatment of waste to recover valuable recyclates and produce a homogenous fuel, followed by thermal treatment in an EfW treatment will be a robust future-proofed configuration. The MBT facility will be the biggest of its type on the island of Ireland and will play its part in maximising recycling levels and in greening Northern Ireland.

EfW involves the combustion of waste to produce steam. The steam will be used to generate electricity for the grid or produce heat which will be distributed to end users through a local heat network. Benefits of the facility include the export of up to 18MW of electricity, enough to power 30,000 homes annually, the recovery of metals for recycling and reuse of ash in the construction industry. The project will contribute to the following policy objectives:

- diverting biodegradable waste from landfill and from export abroad, therefore reducing harmful greenhouse gas emissions;

- the Circular Economy agenda by extracting recyclates, recovery of metals and reuse of ash;
- future energy policy by contributing to renewable energy targets and providing predictable power supply from an indigenous fuel source; and
- climate resilience and net zero carbon targets by producing renewable energy.

Future Proofed

The facilities proposed are modern and future proofed to a significant extent to ensure they can adapt as technology evolves.

A range of decarbonisation opportunities for the future have been anticipated by arc21 to be implemented as the required policy mechanisms are in place and the market develops. These range from providing grid services (of critical value to the electricity system operator as more intermittent renewable generators connect to the grid) district heating schemes, energy storage and hydrogen production/ distribution.

It is also expected that within the lifetime of the facility it will be able to produce alternative fuels for transport to further aid NI's road to decarbonisation. The environmental case for the project is already good. It will get even better with time.

Energy from Waste (EfW) plants are commonplace across Europe and the UK. EfW is a tried and tested technology that ensures the safe and environmentally responsible treatment of waste. EfW plants have operated throughout continental Europe for decades, with over 500 plants in operation today and many more in planning. Many of these are located in countries with long established 'green' credentials such as the Netherlands, Denmark, Switzerland and Germany and can often be found in city centre locations.

In Germany alone, some 24 million tonnes of waste a year are processed in 96 EfW plants. In Great Britain, there are currently 50 EfW plants operational and 17 under construction. On the island of Ireland, there are three operational plants and a further two in planning, including the arc21 project.

It is also important to note that countries such as Germany and Belgium achieve the highest recycling rates and also have the highest energy recovery rates and the lowest landfill rates. For example, in 2018 Germany achieved a 67% recycling rate, 31% thermal treatment (EfW) and 2% landfill. This provides comfort that EfW does not impact negatively on recycling.

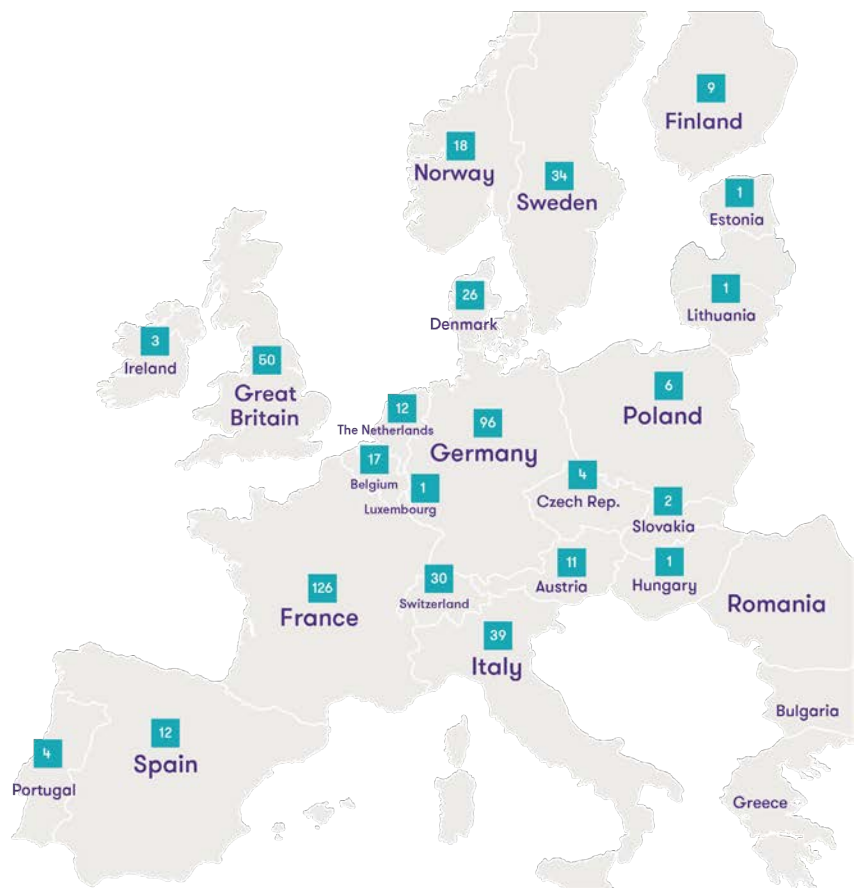
In view of the latest Circular Economy targets a recent study by CEWEP calculated that across Europe there would still be a need for an additional 41 million tonnes of EfW capacity assuming the ambitious recycling targets for commercial and industrial waste will be achieved by 2035.

“Incineration is a hygienic method of reducing ‘waste’ volume and weight which also reduces the potential to pollute.”

World Health Organisation

Energy from Waste

Map showing the number of EfW facilities operating in Europe



A proposal with a history of planning support

The arc21 project has been supported by key stakeholders. Of course, under the rules based democratic system which the statutory planning process is grounded the planning application for developing Hightown Quarry for the project has been subject to scrutiny. This is to be expected and a great deal of care was taken in preparing the environmental statement. Without ignoring a vocal local lobby against the proposal (local opposition is a common feature of novel/large scale schemes), the overwhelming conclusion from a review of the planning process is that the arc21 proposal attracts support for approval across a broad spectrum.

The planning application was lodged in 2014 by arc21 on behalf of its constituent councils and the application has been on a torturous journey through the planning system. It has been recommended for approval by three sets of planning professionals in the planning system following exhaustive examination of the associated submissions.

Statutory consultations took place as part of the planning application process in 2013, 2014 and in 2019/20. Across 70 consultations issued including with Northern Ireland Environment Agency, Public Health Agency, Department for Communities, Health and Safety Executive NI, NIE and Department for Infrastructure, none have responded with objections:

- in 2015 the then Department for the Environment planners recommended approval;
- in 2017 the Planning Appeals Commission recommended approval: *The Commissioner stated in Paragraph 158 "It is notable that none of the statutory consultees has indicated an opinion that the proposal should be rejected.*

Importantly, the need for the proposal is recognised by DAERA Environmental Policy Division and the bodies responsible for waste management in NI. It has also been deemed acceptable by the authorities responsible for protecting health and the environment. Having weighed all of the important material considerations, I take the view that the Department's opinion to refuse the application, for the reasons stated, was unjustified."; and

- in 2017 the planners in the Department for Infrastructure recommended approval and the Permanent Secretary duly approved the decision believing it to be in the public interest. This decision was later overturned following a Judicial Review based entirely on procedural matters surrounding the ability of Department officials to make a decision in the absence of a Minister in post nor an Executive Committee constituted at the time.

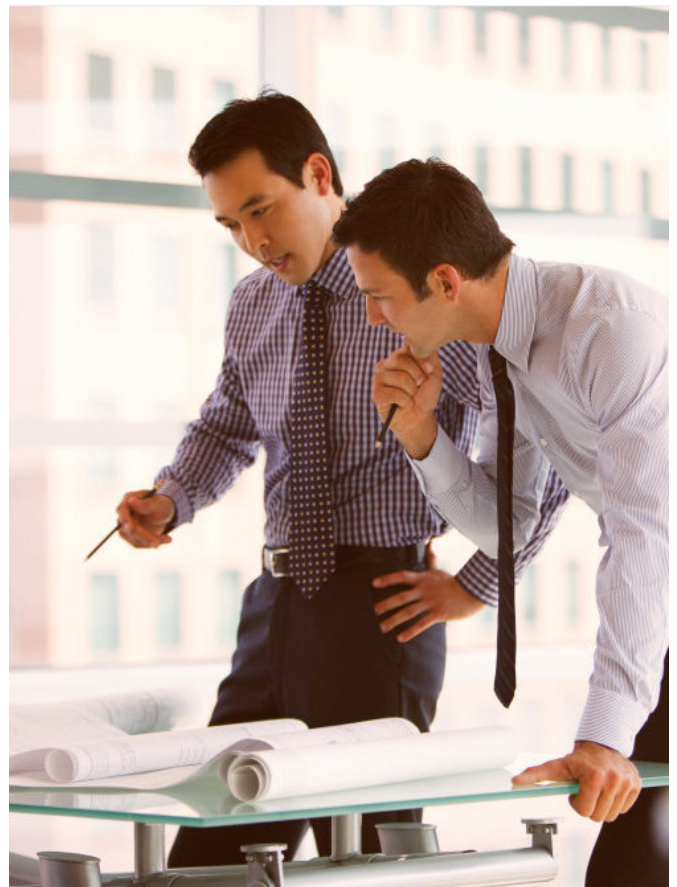
It is important to note that the Judicial Review and the Court of Appeal ruling did not in any way consider the material facts or merits of the planning application, the project's compliance with regional waste policy or indeed the strategic need for such infrastructure as they were not part of the hearings.

The planning application is now, once again, being assessed by the planning officials in the Department for Infrastructure (DfI) and will soon come before the Minister/Executive for a decision.



New decade, new approach

The absence of the NI Assembly for almost three years was brought to an end with a renewed commitment to collaborate in the best interests of all of the people of Northern Ireland. The cracks in public services that were appearing across health, education and infrastructure highlighted the need for the main political parties to re-form the Executive under the banner of the New Decade, New Approach Agreement.



Funding the ambitions of the New Decade, New Approach agreement is a source of debate. Analysis suggests that resolving Northern Ireland's waiting list crisis was costed at close to £1 billion by the Permanent Secretary of Health in 2019.

Water and wastewater infrastructure across Northern Ireland, an enabler of economic development, needs over £3 billion of investment over the next seven years. While the March Budget from the UK Chancellor provided for the beginning of an injection of new infrastructure funding, the demands for spending in NI are significant and have become more acute with the arrival of the COVID-19 pandemic in Northern Ireland.

Applying the New Decade, New Approach Agreement the Executive should take into account the following when making its decision on the planning application for arc21 proposal to develop Hightown Quarry:

- The Northern Ireland courts have clarified that the decision on arc21's planning application is "cross cutting" in that it impacts on more than one Department. Therefore, according to the courts, the planning permission decision must include engagement with the Executive;
- That the financial package (from the UK government) will be accompanied by stringent conditions to deliver a greater level of accountability for public spending and ensure the new government is building sustainable public services;

- Innovative ways need to be found to deliver the necessary public infrastructure envisaged in the Agreement and it is likely that private funding will be required;
- There is equally an urgent need for investment in household waste infrastructure as there is for wastewater infrastructure;
- That a project such as arc21's, which enhances NI's core infrastructure, provides the ability to manage our own waste sustainably and adds to the security of our energy supply could realistically be classed as being in the public interest and one which enhances the effective delivery of services and efficient expenditure of funds;
- The proposal anticipated the Circular Economy and will meet the imperatives to respect the waste hierarchy and the 2030 and 2035 timelines in the CEP; and
- the arc21 project contributes to the low carbon energy and economic strategies required under the New Decade, New Approach Agreement.

The Executive would appear to have no rational or objectively justifiable reason to refuse the planning application for the development

Concluding thoughts

The project will...

1

Divert up to 300,000 tonnes of municipal waste from landfill or export per year.

2

Contribute to Northern Ireland's greenhouse gas emissions targets by the reduction of approximately 57,500 tonnes CO2 Equivalent per year relative to sending waste to landfill.

3

Enhance Northern Ireland's security of supply and increase diversity of energy production.

4

Export 18MW electricity to the National Grid – enough to power in excess of 30,000 homes.

5

Represent a total private sector inward investment in NI infrastructure of c.£240m and results in council owned assets.

6

Create / sustain 337 direct and indirect jobs annually during the operational phase – generating £7.7m in total wages and contributing £24.7m of GVA to the Northern Ireland economy.



Inaction means...

1

The six councils who are members of arc21 will not have a reliable solution to manage their waste.

2

Northern Ireland will have a larger carbon footprint as a result of landfilling its household waste or exporting it in greater quantities abroad to generate electricity there.

3

Northern Ireland will have missed an opportunity to develop an EfW facility (commonplace across UK and Europe) which would have contributed to its renewable energy targets.

4

The reputation of Northern Ireland to approve complex projects will be damaged as it will have failed to deliver any of its three publically procured waste management infrastructure projects.

5

It will not realise an inward investment in public services of £240 million from private sources.

6

16 years and £15 million in public and private development money will have been wasted trying to deliver a needed waste management facility for Northern Ireland.



Grant Thornton

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