

**From:** "Bill Procter" [REDACTED]  
**To:** <epa\_review@environ.ie>  
**Date:** Fri, May 28, 2010 8:05  
**Subject:** CONSULTATION REVIEW ON EPA

Dear Sirs,

We welcome the opportunity to comment on the work of the EPA as an IPPC licensee.

The imposition of an (IPPC license) brings with it responsibilities and expenditure over and above those required in a normal commercial environment. Legislation enacted in the EU during 2006 recognised these circumstances and drafted threshold limits into Environmental Law. This had the effect of removing small operational units whose environmental impact was low from IPPC licensing. However, Ireland chose not to incorporate these changes into Irish Law.

Dineen Refractories (P0531) fall into the above category, operate a plant below the EU thresholds, but are penalised by an IPPC license; the costs of which represent a significant part of operating costs. Whilst appreciating the work of the EPA for the common good, current legislation is strangling small business and those wishing to start projects in an already cash starved environment.

We respectfully submit that harmonisation of Environmental Policy across the EU should be enacted without delay.

Kind regards,  
Bill Procter

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