



Annual Environmental Report (AER) 2023

Company Name: MEDITE Europe DAC

Licence Number: P0027-04

Address: Redmondstown, Clonmel, County Tipperary

Class of Activity¹:

8.7 The production of one or more of the following wood-based panels: oriented strand board, particleboard or fibreboard with a production capacity exceeding 600 m³ per day.

2.1 Combustion of fuels in installations with a total rated thermal input of 50MW or more.

¹ See Appendix I

Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities² of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

² See Appendix I

- 2) Some documents³ are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

³ This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

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Glossary

Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
Beyond Compliance	Beyond compliance is concept to help deliver greater organisational performance and long-term value for the environment, society and the economy.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.

Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.
Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.

Storm Water	Rain water run-off from roof and non-process areas.
Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

Declaration

I, Andrew O'Meara, Environmental Manager, confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

Tick here



1) Introduction

See below a brief description of our facility and a summary of our environmental performance this year.

MEDITE SMARTPLY is a market leading, responsible manufacturer of sustainable timber construction panels. As part of the Coillte Group, we pride ourselves on our sustainable supply chain and manufacturing processes, meaning our products are as environmentally conscious in their make up as they are in their application. MEDITE SMARTPLY define the standards of engineered wood panels. We deliver exceptionally engineered products, outstanding sustainability credentials, unrivalled innovation, and industry leading customer service.

Our manufacturing site in Clonmel (MEDITE) Ireland features the latest production technology to deliver straighter, flatter and more consistent boards than ever before, in a range of sizes and thicknesses unparalleled within the industry. Constant progression and investment have allowed MEDITE to enter new diverse markets and sectors, meaning that there is always a fresh pipeline of new products to address market demands. From our production and research plant in Clonmel, Ireland, we supply a wide range of MDF (medium density fibreboard) products to meet the diverse needs of users, specifiers, and designers across Europe and beyond. Our extensive range includes ten different families of MDF products and many variants, with over 400 possible specifications from a production capacity of some 410,000 m³.

Through consistent commitment to research, development, and ongoing investment in technology, we have established MEDITE as the leading brand in the MDF market by introducing a wide variety of quality products and customer led innovations. Our technological innovations have led the greater market to advances in areas such as finish quality, moisture resistance, flame retardancy and many more MDF attributes.

The operation of this facility in Clonmel is licensed under an Industrial Emissions License Register No. P0027-04, which was issued by the Environmental Protection Agency on 7th March 2017. The facility operates a continuous production shift cycle (24hours / day; 7 days a week). Production

throughput for 2023 was 380,218m³, compared to 2022 was 404,223m³, 420,105m³ in 2021, 373,410m³ in 2020.

The facility has extensive environmental abatement infrastructure, including dryer cyclones, dust bag houses, production line press emissions, banded storage tanks. The site also operates a wastewater treatment plant, average throughput of 30m³/hour (max. of 40m³/hr). The site had a good environmental performance for 2023 with compliance with regulatory requirements.

Contact Us

If you have any questions or would like further information on any aspect of our licensed activity, please contact us directly.

See below details:

www.mdfosb.com

2) How we Manage our Facility

Environmental Management System

Explanation

To ensure our facility's activities do not cause environmental pollution we are required to have detailed documentation systems in place to help us manage and track our environmental performance. These systems are referred to as Environmental Management Systems (EMS). We review our EMS every year and set up-to-date **environmental goals** to continually improve our environmental performance.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

Table 1 Environmental Goals

Environmental Goal	Target Date	Progress
Regulate nutrient balance in wastewater treatment plant biological tank	2023	Good work in 2023, improved control on Nitrate emission seen with maintaining a low speed on big aerator in biological aeration basin.
Maintain wastewater treatment plant licence compliance – replace disc membrane diffusers in biological aeration tank	Aug 2023	Completed.
Maintain wastewater treatment plant licence compliance –	Dec 2024	Install additional storage tank for effluent, to maintain stable food balance for microbial life in biological plant
Maintain wastewater treatment plant licence compliance	Sept 2024	Upgrade diffuser grid in biological aeration basin

Production Line 1 drier improvement Works – reduction in fugitive emissions	Oct. 2024	On going – upgrade works to stage 2 drier ductwork and cyclones planned for 2024.
Identify and commence 2 projects to minimise fugitive dust emissions from ground level	December 2024	Ongoing, radial wood chip conveyor stacker works underway.
Mainswater reduction	December 2023	10% reduction achieved in 2023. Further work in 2024
Surface water protection	Sept 2024	Bund Survey completion.
Improve surface water treatment	Dec. 2024	Install silt traps in surface water drain, Northern Discharge
Reduction in noise emissions	Dec 2024	On track - Complete onsite noise survey, identify locations to introduce site suppression measures
Progress with site pollination program – extend wildflower plantation to other areas onsite	On track – further progress planned for 2024	On track – top of berms in Logyard identified as location for further plantation.
Waste Management	December 2024	Improve recycling and composting.
Plastic reduction	June 2024	Reduce dependence on product plastic packaging
Chemical Management	Sept. 2024	Automate approval process for new chemicals
Commence integration of site ISO Standards	December 2023	Achieved, further progress planned with introduction of Q pulse software in 2024
Housekeeping Audits	31/12/2024	Commenced auditing and reporting of weekly audits
Boiler Replacement Project	31/12/2024	On track – licensing preparation and planning underway

Add rows as necessary

Comment

2023 EMP Performance:

All projects completed in 2023 and some progressed into 2024.
Environmental Management Programme for site is on track.

Beyond Compliance

Explanation

We are legally required to comply with our environmental licence. However, the EPA realise that some sites go further than just complying with their environmental licence requirements. Some projects carried out at facilities can have long term positive impacts on the environment and local communities.

The EPA's beyond compliance initiative is encouraging us to identify and report on these environmental and sustainability projects. For example, the project could involve renewable energy, biodiversity, water conservation or exemplar community engagement.

Did any project completed on your site in the reporting year go beyond your licence requirements?

Yes

No

If yes, provide details of one case study in Appendix III that demonstrates how the project went beyond compliance of your licence.

3) Energy & Water

Energy

Explanation

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

Table 3 Energy Used

Energy Used	Quantity (GJ)	% Increase/ decrease on previous year
Electricity	339,143	-2.72%
Heavy Fuel Oil	-	-
Light Fuel Oil		
Natural Gas	100,091	-2.96%
Propane	2,950	-4.83%
Coal / Solid Fuel	-	-
Peat	-	-
Renewable Biomass	957,417	-13.07%
Renewable Energy Generated On-site	-	-
Total Energy Used	1,399,601	-10.5%

Comment

Energy decrease seen in 2023 from previous year by 10.5% mainly due to curtailed production output in 2023 of 5.9%. Remainder reduction due to energy efficiencies gained.

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

Table 4 Energy Generated

Energy Generated	Quantity (GJ)	% Increase/ decrease on previous year
Renewable Energy	957,417	-13.07%
Total Energy Generated	957,417	-13.07%

Comment

Meditate use wood biomass as a clean fuel for energy recovery in its site wood biomass boilers and energy plant. In 2023 a decrease was seen on the previous year. Again, due to a reduced production output in 2023 of 5.9% and energy efficiencies gained by improved wood biomass mix.

Water

Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

Table 5 Water Used

Source of Water Used	Quantity (m³/year)	% Increase/decrease on previous year
Groundwater	300	No change
Surface Water	380,160	-4.0%
Public Supply	10,481	-9.5%
Recycled Water	-	-
Rainwater	-	-
Total Water Used	407,881	-4.1%

Comment

Surface water is used as boiler feed water, reduction in water used is related to reduction in production throughput and reduction in use of mainswater (public supply)

4) Environmental Complaints

Explanation

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us⁴ directly. You can also contact the EPA⁵ if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

Table 6 Summary of All Environmental Complaints Received in

Type of Complaint	Number of Complaints	Number Closed
Odour / Smells	-	-
Noise	-	-
Dust	1	1
Water Quality	-	-
Air Quality	-	-
Waste	-	-
Litter	-	-
Vermin/Flies/Birds	-	-
Soil Contamination	-	-
Vibration	-	-
Other	-	-

⁴ See Section 1, Introduction – Contact Us

⁵ If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

Comment

1 anonymous complaint received in April 2023. No follow up as no details were received on location complainant was from. Full examination of site took place as a precautionary measure – No obvious abnormal activities identified.

5) Environmental Incidents

Explanation

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

Table 7 Number of Environmental Incidents

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Abatement Equipment Offline					
Breach of Ambient ELV					
Breach of Emission Limit					
Explosion					
Fire					
Monitoring Equipment Failure					
Odour					
Spillage					
Breach of trigger Level					
Uncontrolled Release					

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Other					

Comment

No Incidents reported during 2023.

As part of its EMS programme the company is committed to continuous improvement in all its activities that potentially can impact the environment.

6) Our Environmental Emissions

Explanation

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA⁶.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

⁶ See section 5, Incidents

Storm Water

Explanation

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. carparks, and generally shall not contain any pollution. Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

1. Storm water from our facility is managed prior to release by;

Two Step Solids separation with step screen and run-down screen, solids settlement in interceptor settling lagoons and finally an oil separator

2. Storm water from our facility is released into the following water bodies:

River Anner

Table 8 Summary of Storm Water Monitoring

Parameter measured	No. of Samples	% Compliant⁷	Comment

Add rows as necessary

Comment

**Storm water discharge is combined with the effluent wastewater discharge at emission point SW2 combined process effluent and surface runoff. See table 9 for summary of monitoring from this licensed discharge point.

⁷ % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

Waste Water

Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;

Primary screening, Dissolved Air Flotation, MBBR, Dissolved Air Flotation and Activated Sludge Biological basin

2. Treated waste water from our facility is released into the following water bodies:

River Anner

Table 9 Summary of Waste Water Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
Flow	365	100	Daily
pH	365	100	Daily
Suspended Solids	49	100	Weekly
COD	49	100	Weekly
BOD	49	100	Weekly
Nitrates	32	100	Fortnightly
Ammonia	28	100	Fortnightly
OFG	4	100	Quarterly
Orthophosphate	20	100	Monthly
Total Phosphorous	20	100	Monthly
Metals	1	100	Annually
Phenol	12	100	Monthly

Add rows as necessary

Comment

100 word limit

Air

Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

1. We monitor air emissions from the following number of emission points at our facility.

Main emission points at which monitoring is carried out are: Three Dryer stage 1 emission points A2-5, A2-6 and A2-21. Four press fans A2-12, A2-13, A2-22, A2-23 and one press exhaust press fan A2-15.

Table 10 Summary of Air Emissions Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
Formaldehyde	Biannual	100	
Dust	Quarterly	100	
PM ₁₀	Annual	100	
CO	Quarterly	100	
NO _x	Quarterly	100	
MDI	Annual	100	
CVOCs	Annual	100	
Dioxins and Furan	Annual	100	

Add rows as necessary

Comment

100 word limit

Table 11 Summary of Odour Assessments Carried Out

Assessment Conducted By	No. of Odour Assessments	% Compliant⁸	Comment
Licence Holder			
EPA			

Add rows where necessary

Comment

**There was no requirement to carry out odour assessment in 2023.

⁸ A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at [Air Enforcement | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/enforcement/)

Fugitive Solvent Emissions

Are you required to monitor fugitive solvent air emissions from your facility?

Yes

No

Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations⁹. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

Table 12 Summary of Fugitive Solvent Emissions

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant

Comment

****There is no requirement to carry out fugitive solvent air emissions monitoring in Medite.**

⁹ See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

Groundwater

Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

1. Do you have a groundwater monitoring programme in place?

Yes

No

2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?

Yes

No

Table 13 List of Groundwater Pollutants Identified

Pollutants
Based on previous review of the site activities the contaminants of potential concern and the parameters that would indicate an issue with the groundwater beneath the site are as follows:
Phenols
Ammonium
Formaldehyde
Total Petroleum Hydrocarbons
Diesel range organics
Petrol range organics
Mineral oils
Heavy metals
Elevated pH
Sodium
Chloride
Orthophosphate

Add rows as necessary

3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.

The preliminary risk assessment review for the landfill completed in February 2016 suggests that the risk from landfill leachate to the underlying groundwater and the river Anner is low. It considered that the on-going landfill monitoring and assessment programme is the most sensible solution for the management of the residual contamination and leachate generation within the waste body.

Comment

100 word limit

Noise

Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

1. We conducted noise monitoring on the following dates this year:

Noise survey was conducted on the 11 and 12th October 2022

2. Where was the noise monitoring carried out?

- i. the boundary of our facility;
- ii. noise sensitive locations off-site; or
- iii. both.

4 x Noise sensitive locations off-site

3. Were measured noise levels compliant with your EPA licence limits?

Yes

No

If No, we took the following actions to address the noise level exceedances?

150 word limit

Comment

Noise Survey of the site operations scheduled as required by the Agency. There will be one carried out in 2024 to ensure site compliance.

7) Waste

Waste Generated

Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in Table 14 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

Table 14 Waste Generated

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	79.01	+43.0%	100
Non-Hazardous	35,169	+3.0%	100
Inert	0	-	
Total Tonnes	35,248.01	-	

Comment

The majority of waste produced at Medite is non-hazardous with less than 80 tonnes of hazardous waste produced in 2023. Much of this hazardous waste is waste oils, process resin / dyes and contaminated packaging. Non-hazardous wastes are composed of MDF product sander dust, wastewater treatment plant sludge, scrap metal, wood ash, wastes packaging and mixed packaging/general waste. A significant portion of waste produced at Medite

(~90%) is recovered on-site as an energy wood biomass fuel source in the combustion plant. Over 99% of the total waste produced at Medite is recovered. Improved classification and segregation of waste onsite in 2023.

Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes

No

Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 15 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

Table 15 Waste Accepted

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	0	-	-
Non-Hazardous	21,970	-7.5%	100
Inert	0	-	-
Total Tonnes	21,970		

Comment

Medite Heating Systems capacity:

Boiler No.1	18MW
Boiler No.2	18MW
Energy Plant Line 2	19MW
Thermal oil Heater	6MW

Total Wood Biomass fuelled heating systems 55MW

Total Fossil fuelled heating systems 6MW

Majority of the Medite plant heat energy requirement is derived from the combustion of Wood Biomass fuel. Less than 10% of the plant heat energy requirements are generated by Fossil fuel.

Biomass Fuel

As all Biomass comprises renewable fuel, the theoretical emission of CO₂ from the wood combustion process balances out giving a net emission of Zero.

8) Financial Provision

Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility¹⁰ by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes

No

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

CRAMP was submitted and received by the Agency on the 26th February 2024

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

ELRA was agreed by the Agency on the 18th December 2018.

4. Has there been any significant changes on your site since the last agreements?

Yes

No

If yes, have you submitted details to the EPA?

¹⁰ See Appendix II

Yes

No

N/A

Appendix I

Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

- Class 1 Minerals and other materials
- Class 2 Energy
- Class 3 Metals
- Class 4 Mineral fibres and glass
- Class 5 Chemicals
- Class 6 Intensive Agriculture¹¹
- Class 7 Food and drink
- Class 8 Wood, paper, textiles and leather
- Class 9 Fossil fuels
- Class 10 Cement, lime and magnesium oxide
- Class 11 Waste
- Class 12 Surface Coatings
- Class 13 Other Activities

¹¹ This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at [Compliance & Enforcement: Licensees: Reporting Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix II

High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

NOTE:

This list is subject to change.

See the link below for further information.

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix III

Beyond Compliance

The case study below shows how we went beyond the requirements of our licence in the reporting year.

The priority energy & cost reduction focus in 2023 was on lowering our usage at Medite where possible in potable water, compressed air & steam consumption across these three major utilities in order to reduce overall energy consumption costs annually.

The energy consumption & cost reduction achievements at Medite in 2023 calendar year were as follows:

Steam trap survey and remediation from completion of steam system repairs – annual energy saving of 3,295,000 kilowatt hours.

- 1. The overall hourly usage of potable water was reduced by 10% for the site following a site wide usage review and the completion of several conservation upgrades – this reduction will amount to approximately 1 million litres of water per annum.*
- 2. Air leaks identification survey and remediation of system air leakages – the estimated annual savings will be approximately 500,000 kilowatt hours.*

The energy reduction focus in 2024 is directed towards the following next priority focus areas:

Steam separation bends – new installation of higher efficiency steam bends planned this year will achieve savings of 8,500,000 kilowatt hours.

- 1. Air compressor package project – pre-engineering study underway to scope full replacement planned for 2025 which will result in more energy efficient compressor unit modules and achieve a 7% reduction in electrical energy costs.*
- 2. Optimisation Upgrade of Process fans – design consultant has been engaged and new fan design is underway to specify more optimum and efficiently sized & specified fans - which will reduce the electrical energy consumption in Line 2 Drying and Fibre Handling areas.*