

Northern Ireland Environment Agency  
Waste & Industrial Pollution Regulation  
and Enforcement Division



Department of  
**Agriculture, Environment  
and Rural Affairs**

An Roinn

**Talmhaíochta, Comhshaoil  
agus Gnóthaí Tuaithe**

Depairtment o'

**Fairmin, Environment  
an' Kintra Matthers**

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)

Reference Number: **DAERA/26-326**

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07 July 2026

Dear [REDACTED]

### **Environmental Information Regulation 2004**

With regard to your request for information received by the Department on 12 May 2026 which sought the following information:

- **Information on current or historic authorisation — including PPC permits, Waste Management Licences (WML), IPPC / IED authorisations, planning consents with conditions touching landfill gas & other questions.**

I can advise that the Department has completed its search and can confirm the information held which can be disclosed and can be found below as answers to your questions in **bold** and on the spreadsheet and documents attached.

The Department has decided not to disclose some of the information you requested as it considers **Regulation 12(4)(b) of the Environmental Information Regulations** to be engaged. In these instances, the Department is legislatively required to consider the public interest in disclosure. An associated Public Interest Test has been conducted and is attached for your information at **Annex A**.

If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.

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We invest in people Standard

Some of the information held constitutes personal data of which you are not the data subject. We have redacted the signatures of individuals from the released documents. Under **Regulation 13(1) of the EIR**, information is exempt from disclosure if it constitutes the personal data of a third party, and its disclosure would contravene any of the data protection principles outlined in the UK GDPR and Data Protection Act 2018. In these instances, the Department is required to consider if disclosure would breach the first Data Protection Principle, which states that processing must be lawful, fair and transparent.

The Department has considered this element within the test attached at **Annex B** and has determined that no lawful basis for disclosure under EIR exists. Please bear in mind that any disclosure must be considered in terms of disclosure to the “world at large” and not just to you, the requester. Consequently, third party personal data falling within the scope of this request has been withheld.

**Question 1 — Complete authorisation perimeter (re-framed Q1 of 26-259).**

*Please list all landfill sites in Northern Ireland where any current or historic authorisation — including PPC permits, Waste Management Licences (WML), IPPC / IED authorisations, planning consents with conditions touching landfill gas, or any other regulatory instrument held by NIEA — authorises any of the following activities:*

*(a) collection and combustion (flaring) of landfill gas; (b) collection and utilisation of landfill gas for electricity generation, heat recovery, or other energy purposes; (c) operation of Dual Fuel, anaerobic digestion, biomethane upgrading or other generating plant on a landfill site that uses landfill gas as a primary or secondary fuel; or (d) post-closure landfill gas management at sites that have ceased to receive waste.*

*Please indicate for each site:*

- *Authorisation reference and type (PPC, WML, IPPC/IED, planning, other);*
- *Operator (DAERA permit/licence holder);*
- *Site address or location reference;*
- *Authorisation issue date;*
- *Authorisation status (active, surrendered, revoked, expired);*
- *Activities authorised (which of (a)–(d) above).*

*Please specifically confirm whether the search has covered the PPC register, the WML register, IPPC / IED authorisations, and planning records, and flag any of these that have not been searched.*

**Please see attached spreadsheet which has been compiled from the PPC Register and WML Register and answers your specific query in Q1.**

If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.

**Question 2 — The three named sites missing from 26-259 Q1.**

*For each of (i) Aughrim Landfill and the Mullaghglass Quarry gas-extraction site that supplies it, (ii) North Foreshore Landfill, and (iii) Green Road Quarry (Ballyclare, BT39 9LN), please provide:*

- *The current authorisation(s) under which each site operates;*

**Aughrim Landfill – Please find attached.**

**Mullaghglass Quarry – Please find attached.**

**North Foreshore Landfill – Please find attached.**

**Dargan Road Gas Utilisation Plant (North Foreshore) – Please find attached.**

**Green Road Quarry – Please find attached**

- *Authorisation issue date(s) and current status;*

**Please see attached Spreadsheet.**

- *Why each site was not included in the 26-259 Q1 response (this will help us calibrate the perimeter for any future enquiry);*

**The information was taken from a spreadsheet which did not contain the full list of sites.**

- *Current operational status as known to NIEA: actively generating electricity, flaring without electricity generation, no longer generating or flaring, or status not known.*

**Please see attached Spreadsheet.**

**Question 3 — All NI Waste Management Licences (WML) authorising landfill gas activity.**

*Please provide a complete list of NI Waste Management Licences that currently authorise (or have historically authorised) any of the activities (a)–(d) in Question 1. For each, please give the WML reference, operator, site name and address, issue date, current status, and a brief description of the authorised activity.*

*This question is intended to surface any further sites in the WML-era catalogue (analogous to Glassmullagh WML 16/01) that would not have appeared in the 26-259 P-permit-keyed search.*

Please see attached spreadsheet.

**Question 4 — Basis of the 26-259 Q2 operator-report flaring listings.**

*For each of the four sites listed in 26-259 Q2 (Craigmore Landfill, Glassmullagh Closed Non-Haz, Drummee Closed Non-Haz, Lisbane Landfill), please provide:*

- The form and date of the operator report on which NIEA's assessment is based (e.g. annual return, periodic compliance report, inspection report, written notification);*

**Craigmore Landfill – Annual environmental monitoring report.**

**Glassmullagh Closed Non-Haz - Annual environmental monitoring report.**

**Drummee Landfill - Annual environmental monitoring report.**

**Lisbane Landfill - Annual environmental monitoring report.**

- The name of the entity that submitted the report (the DAERA permit/licence holder, or another party);*

**Craigmore Landfill –Annual report submitted by River Ridge Recycling.**

**Glassmullagh Closed Non-Haz, Annual report submitted by Fermanagh and Omagh District Council.**

**Drummee Landfill - Annual report submitted by Fermanagh and Omagh District Council.**

**Lisbane Landfill - Annual report submitted by Taggarts.**

- Whether the report addresses electricity generation specifically, or only describes gas management at the site;*

**The reports only describe gas management at the site.**

- Whether NIEA holds any subsequent operator reports that update or supersede the originally-cited report;*

**The NIEA does not hold any subsequent operator reports that update or supersede the originally-cited report as the annual environmental monitoring reports contain the relevant information in line with the authorisation.**

- Any inspection records or compliance correspondence held by NIEA on the same point

Request to be considered Manifestly Unreasonable on the grounds of cost and considered Regulation 12(4)(b) of the Environmental Information Regulations to be engaged.

In summary, the Department has identified at least 1857 records relevant to this specific request. The Department has determined the cost to review and retrieve the documents associated would cost the Department an estimated £1547.

Please see the table below detailing how the Department has reached this decision. The time required to review each record will vary due to the complexity of the record. An estimated 2-minute review time has been used for the cost calculation of reviewing each record, however, the average time will likely be higher.

| Number of potential records specified | Time to review each record and extract information | Time taken @ £25/hr of staff time | Total |
|---------------------------------------|----------------------------------------------------|-----------------------------------|-------|
| 1857 records                          | 1857 x 2 minutes = 3714 minutes                    | 3714 / 60 = 62 Hours x £25=       | £1547 |

*The basis of these reports matters because at two of the four sites (Drummeemore and Glassmullagh), separate parties hold NIRO accreditations for Dual Fuel generation infrastructure (Devine and Associates Ltd at Drummeemore under R00143NANI 280 kW and R00200NANI 240 kW; Devine and Associates Glassmullagh Ltd under R00138NANI 277 kW). The operator-side public record at devineandassociates.com describes continuous management and operation of gas-utilisation infrastructure at both sites. NIEA's reading of the operator-report basis would help us reconcile this apparent contradiction.*

#### **Question 5 — Drummeemore elevated thermal-input bracket.**

*The 26-259 Q1 entry for Drummeemore Landfill (P0044/04A) places the site in the "less than 3MW or more but less than 50MW" thermal input band, which is anomalous against the rest of the NI LFG estate (all <3MW). Please confirm whether this reflects (a) historic permit headroom from the active operating period, (b) a higher current gas-volume potential at the site, or (c) the inclusion of Devine and Associates' AD installation (R00200NANI Derrygonnelly Road AD) within the same thermal envelope. A short clarification would help us understand the site's commercial relevance accurately.*

This would most likely reflect - (a) historic permit headroom from the active operating period. The "less than 3MW or more but less than 50MW" thermal input band would refer to Section 5.1 Part A of the PPC Permit (see screen capture below). The rated thermal input of less than 3MW is referenced under 'Directly Associated Activity' (please see screen capture below)

Please note, the electricity generation plant had been removing landfill gas from within the waste at Drummee since 2014. However, there is insufficient gas to allow the engine to operate, referenced in Section 5.1 Part A of the Permit, and these have now been removed. Excess gas is now being flared which would fall under the directly associated activity.

|                                                                            |                                                                                                                                            |                                                           |
|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|
| Section 5.1 Part A (h)<br>Incineration of a fuel manufactured from a waste | Utilisation of landfill gas for energy recovery in an appliance with a rated thermal input of 3 MW or more but less than 50MW.             | Landfill gas arising from Drummee Landfill                |
| <b>Directly Associated Activity</b>                                        |                                                                                                                                            |                                                           |
| Landfill gas management                                                    | Collection and utilisation of landfill gas for flaring or for energy recovery in an appliance with a rated thermal input of less than 3MW. | Landfill gas arising from the Permitted Drummee Landfill. |

## Closing

*I appreciate that some of these questions may require coordination across multiple NIEA teams (Waste Permitting; Waste Management Licensing; IPPC / IED; Inspection). If the request as a whole exceeds the proportionality threshold under EIR or FOIA, please contact me to discuss how the scope might be most usefully prioritised — Question 1 (the perimeter close) is the highest-priority item, and the remaining questions can be deprioritised or split into a subsequent request if needed.*

If you require any clarification, believe that any part of your request has been overlooked, misunderstood or misinterpreted, please contact me in the first instance to see if it is a matter that can be resolved.

If you are unhappy with the manner in which your request for information has been handled or the decision to release/withhold information, you have the right to request a formal review by the Department. If you wish to do so, please contact The Review Section either by e-mailing [daera.informationmanager@daera-ni.gov.uk](mailto:daera.informationmanager@daera-ni.gov.uk) or by post at The Department of Agriculture, Environment and Rural Affairs, Data Protection & Information Management Branch, Floor 2, Jubilee House, 111 Ballykelly Road, Ballykelly, Limavady BT49 9HP, within two months from the date of this letter.

If after such an internal review you are still unhappy with the response, you have the right to appeal to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, CHESHIRE SK9 5AF, who will undertake an independent review of the Department's decision.

If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.

Yours sincerely,

**Waste Permitting Team**

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## Annex A

### Public Interest Test – EIR

Reference Number – DAERA/26-326

#### Requested Information

- *Any inspection records or compliance correspondence held by NIEA on the same point.*

#### Exemption / Exception under consideration

- Regulation 12(4)(b) - Manifestly Unreasonable

#### Reasons why the public interest would favour disclosure:

- Everyone has the right to access environmental information.
- Disclosure of the information would provide confidence that the regulators decision making processes have been carried out fairly and without fear or favour.

#### Reasons why the public interest would favour withholding:

- Complying with the volume of information requested would apply an unjustified level of disruption to staff already working in difficult circumstances due to already busy workloads.
- Searching at least **1857** records would commit excessive time and resources at a time when the Department is facing other competing priorities.
- The time commitment to fulfil this request in full would pose an unreasonable burden on the Department and would involve an unreasonable diversion of resources including staff resources from essential and statutory responsibilities.
- The requestor's right of access does not justify the commitment of a significant sum of public money to collect the information.

#### Conclusion

Following consideration of the Public Interest Test, the Department has decided that it would not be in the Public Interest to fulfil the entire request made by the requestor. The Department considers this to be manifestly unreasonable request based on the cost and burden of dealing with some of the requests and consequent diversion of resources in dealing with this query.

#### Waste Permitting Team

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## Annex B

### LAWFULNESS, FAIRNESS AND TRANSPARENCY TEST

DAERA/26-326 - Environmental Information Regulations 2004 (EIR)

#### Request Details:

- Information on current or historic authorisation — including PPC permits, Waste Management Licences (WML), IPPC / IED authorisations, planning consents with conditions touching landfill gas & other questions.

#### Brief description of the Personal Data falling within the scope of the request

Within the request there are some signatures that have been redacted from PPC Permits.

### LAWFULNESS

#### Please identify the lawful basis for processing

Personal data is processed when it is lawfully disclosed in response to an EIR request.

The lawful basis for processing is set out in Article 6 of the GDPR and the ICO expects at least one of two lawful bases (Consent / Legitimate Interest) to apply before the personal data held can be disclosed.

- ☐ **Consent:** This will apply when the data subject(s) clear consent exists that allows you to disclose the personal data falling within the scope of this request.
- ☐ **Legitimate interests:** the processing is necessary for the Department's legitimate interests or the legitimate interests of a third party that overrides the data subject(s) rights and freedoms, particularly their right to privacy.

#### Consideration of Legitimate Interests

##### 1. PURPOSE

As the disclosure of personal data under EIR is a disclosure to the world at large, doing so on the strength of a requester's private interests alone could constitute a disproportionate and unwarranted level of interference with the data subject(s) rights and freedoms, particularly their right to privacy and family life under the Human Rights Act 1998.

##### 2. NECESSITY

The right of access under EIR does not in itself constitute a **pressing social need**. The Department has considered and not identified any such need for the data subject's right to privacy to be interfered with.

If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.

## **CONCLUSION**

Having considered all of the information contained within this test, the Department has established that, on balance, there is no lawful basis for the disclosure of third party personal data falling within the scope of the request.

**Waste Permitting Team**

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