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ENVIRONMENTAL PROTECTION  
AGENCY  
28 JUL 2003

ENVIRONMENTAL PROTECTION  
AGENCY WASTE LICENSING  
RECEIVED  
28 JUL 2003  
INITIALS.....  
*Residence:*

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25.7.03

Environmental Protection Agency  
Johnstown Castle Estate  
Co. Wexford

Ref: 167/1 – Indaver Ireland Waste management facility, Carranstown, Co. Meath

Dear Sir,

I am writing to express my concern as a local family doctor at the proposed issuing of a licence for a municipal waste incinerator at Carranstown, a short distance from the increasingly populous areas of Drogheda and East Meath. I feel that decisions to date by An Bord Pleanala have been taken on planning grounds, but without consideration of the possible health issues which I detail below.

1. Incineration produces a cocktail of varied chemicals. These include dioxins, which are a group of extremely toxic substances linked to a variety of human diseases including cancer. Fortunately the incineration industry has made great efforts to improve filtration systems for these.

However, there are numerous other dangerous chemicals that may be produced by incineration of mixed waste that are also toxic to humans. Numerous research studies have shown a series of clusters of illnesses near to incinerators, however these results have been inconsistent. It is my opinion that this may well reflect a different mix of waste in each incinerator and therefore a different chemical emission from each. I would therefore propose that the lack of consistent findings of adverse health effects is not a valid reason for stating that modern incineration is safe.

2. Many of the chemicals produced by incineration persist in the landscape. Even if emissions are kept at low levels, this will not prevent the escape of small amounts of toxic chemicals into the environment. These do not go away! Indeed, they may persist in the land, in the food chain and indeed in our bodies where toxic effects may potentially occur after many years of low-level exposure. This may be particularly critical in babies and the unborn that may be more vulnerable to these effects.

3. Monitoring and safety measures may not be reliable. As you are well aware, new evidence about the toxic effects of chemicals is constantly being updated. Many people in the Drogheda area realise only too well with regards to asbestos that we should have known 40 years ago what we know now. And indeed when the EU

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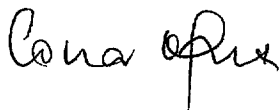
informs us of new safety levels for incinerator emissions, we presume that this implies that the old levels are now less acceptable. Today's "safe" level may be tomorrow's unsafe one. Furthermore, some of the more notorious incidents relating to incinerators may well relate to "rogue" emissions, i.e. unpredictable large releases of chemicals due to human or mechanical failure. It is my understanding that emissions will not be continuously monitored,

Ultimately, there is at least great uncertainty about the health effects of incineration. The recently produced government sponsored Health Research Board report of the effects of waste management stated "the evidence for a link between cancer and proximity to an incinerator is not conclusive. Further research using reliable estimates of exposure over long periods of time, is required to determine whether living near landfill sites or incinerators increase the risk of developing cancer". I feel it is inappropriate to ask us to become part of the research required to determine exactly how dangerous incinerators might be!

I have chosen not to itemise particular pieces of research, however the recent report from France suggesting increased foetal abnormalities near an incinerator highlights the basic message of this letter, namely that our understanding of the adverse effects of incineration on the local population and environment is incomplete and therefore unsafe.

I would appreciate an acknowledgement of this letter,

Yours sincerely



Conor O'Shea

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