

objection No. (4)

ENVIRONMENTAL PROTECTION
AGENCY
12 NOV 2004

To; E.P.A.
Johnstown Castle
Co. Wexford

11-11-04

ENVIRONMENTAL PROTECTION
AGENCY
16 NOV 2004

From; James Rountree
Sellar,
Nobber
Co. Meath

Re; E.P.A. Licensing of Indaver Incinerator Plant at Carronstown, Duleek, Co. Meath
and Ringaskiddy Co. Cork.

Dear Sir/Madam,

I have concerns about restrictions being placed on farms near the incinerator in the unlikely event of pollution arising. Responsibility for business continuity and or loss of income and or enterprise must rest with Indaver. Indaver must be directly responsible for the consequence of any pollution.

I have further concerns about restrictions being placed on farms indirectly related to pollution. Who will be responsible for a farmers loss of business continuity, enterprise and income in the following circumstances. An increased or rising level of pollution is noted but it is not above the specified limit. The Department of Agriculture or some other body has concerns about a potential food scare or marketing concerns Then a decision is made to place restrictions on local farms without reference to any other person or body.

There is no practical avenue to justice for the farmer in these circumstances. The truth about this question has been elusive and begs a question about RAISON DETAT which only hindsight will have an answer for. The farmer does not know where he stands and what the future will bring. Incineration company agreements with farmers appear to have more to do with the image of testing than a commitment to farmers if unlikely events happen and the "Get the best deal you can get advice" could be potentially spurious in the light of restrictions with out a test failure.

Incineration Plant will not always conform to specified conditions. No one wants fumes, soot, dust from incinerated batteries, dioxin or what ever else in the country side. Shareholder dividend takes precedent over quality of service. Government tries to

For inspection purposes only.
Copyright © 2004. Not to be published for any other use.

balance this with regulation. Occasionally politics (and maybe cross purposes too) intervene and justice is not done. Justice and respect for justice has to be the bottom line. Indaver's record is not perfect. Management culture and ethics will always be a communication problem, and the State has communication problems too.

This writer believes that the farmers' case in these circumstances will now depend on innovation on the periphery i.e. a cobbled together "appendix."

4 Points;

- Insincere talks (for show) will be detrimental.
- Mutual commitment that farm business continuity is a confidence matter for all parties.
- Round table Justice is practicable.
- Commitment to Audited Reinstatement to the farming community is the best solution (Financial Source?)

Farming interests are expected to be subservient to incineration and we are peripheral and in danger of being overlooked. Our problem arises in the case of unlikely events happening, but it is a substantial concern none the less.

I request you to place a pre-condition in the licence that farmers will be treated justly by Indaver and that the Government gives the same undertaking. Farmers see joint enterprise in these two projects – State and Indaver. Justice to the farmer is a joint and several matter. No official should sign a restriction order with out a clear conscience that the farmer can make arrangement to stay in business and that he will be enabled to do so.

There are other details I would like to see,

- Beef needs to be tested for dioxin.
- The farmer needs to know the results of any test under taken.
- If a farmer arranges a test to accepted standards then this must be accepted by all parties. (No Prohibition).
- Random testing is more ideal than fixed testing points.
- Baseline Study to be comprehensive and to give full protection to the farming community.

Farmers should have a right to appoint a specified competent person to liaise and review matters and especially read original reports. (There is no reason why this person could not also represent local community interest too)

Farmer relations are a business confidence matter for all parties. When the farmer is an innocent party, the potential for reinstatement must be the overriding yardstick ~~an~~ ~~important~~ yardstick.

Yours

James Rountree
James Rountree

For inspection purposes only.
Consent of copyright owner required for any other use.

Save copy

To: E.P.A.
Johnstown Castle
Co. Wexford

11-11-09

From: James Rountree
Sellar,
Nobber
Co. Meath

Re: E.P.A. Licensing of Indaver Incinerator Plant at Carronstown, Duleek, Co. Meath
and Ringaskiddy Co. Cork.

Dear Sir/Madam,

I have concerns about restrictions being placed on farms near the incinerator in the unlikely event of pollution arising. Responsibility for business continuity and or loss of income and or enterprise must rest with Indaver. Indaver must be directly responsible for the consequence of any pollution.

I have further concerns about restrictions being placed on farms indirectly related to pollution. Who will be responsible for a farmers loss of business continuity, enterprise and income in the following circumstances. An increased or rising level of pollution is noted but it is not above the specified limit. The Department of Agriculture or some other body has concerns about a potential food scare or marketing concerns. Then a decision is made to place restrictions on local farms without reference to any other person or body.

There is no practical avenue to justice for the farmer in these circumstances. The truth about this question has been elusive and begs a question about RAISON DETAT which only hindsight will have an answer for. The farmer does not know where he stands and what the future will bring. Incineration company agreements with farmers appear to have more to do with the image of testing than a commitment to farmers if unlikely events happen and the "Get the best deal you can get advice" could be potentially spurious in the light of restrictions with out a test failure.

Incineration Plant will not always conform to specified conditions. No one wants fumes, soot, dust from incinerated batteries, dioxin or what ever else in the country side. Shareholder dividend takes precedent over quality of service. Government tries to

Page 1 of 3

balance this with regulation. Occasionally politics (and maybe cross purposes too) intervene and justice is not done. Justice and respect for justice has to be the bottom line. Indaver's record is not perfect. Management culture and ethics will always be a communication problem, and the State has communication problems too.

This writer believes that the farmers' case in these circumstances will now depend on innovation on the periphery i.e. a cobbled together "appendix."

4 Points;

- Insincere talks (for show) will be detrimental.
- Mutual commitment that farm business continuity is a confidence matter for all parties.
- Round table Justice is practicable.
- Commitment to Audited Reinstatement to the farming community is the best solution (Financial Source?)

Farming interests are expected to be subservient to incineration and we are peripheral and in danger of being overlooked. Our problem arises in the case of unlikely events happening, but it is a substantial concern none the less.

I request you to place a pre-condition in the licence that farmers will be treated justly by Indaver and that the Government gives the same undertaking. Farmers see joint enterprise in these two projects – State and Indaver. Justice to the farmer is a joint and several matter. No official should sign a restriction order without a clear conscience that the farmer can make arrangements to stay in business and that he will be enabled to do so.

There are other details I would like to see:

- Beef needs to be tested for dioxin.
- The farmer needs to know the results of any test undertaken.
- If a farmer arranges a test to accepted standards then this must be accepted by all parties. (No Prohibition).
- Random testing is more ideal than fixed testing points.
- Baseline Study to be comprehensive and to give full protection to the farming community.

Farmers should have a right to appoint a specified competent person to liaise and review matters and especially read original reports. (There is no reason why this person could not also represent local community interest too)

Page 2 of 3

Farmer relations are a business confidence matter for all parties. When the farmer is an innocent party, the potential for reinstatement must be the overriding yardstick

Yours

James Rountree

James Rountree

For inspection purposes only.
Consent of copyright owner required for any other use.

Page 3 of 3