Obj® 167-1

ENVIRONMENTAL PROTECTION AGENCY
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Name and address of the objector:

Irish Doctors' Environmental Association Thomastown Kilcullen Co. Kildare Mult

Subject matter of objection:

Waste license Register No: 167-1

Applicant: Indaver Ireland Facility: Duleek, Co. Meath

Dear Sir,

Irish Doctors Environmental Association (IDEA) has serious concerns in relation to the decision by the Environmental Protection Agency to site a facility for municipal waste incineration in Duleek, Co. Meath. We refer to our earlier submission and believe that the medical points raised were not referred to in the license.

Many recent reports in the medical hterature support our concern. In one study, data from an ongoing study involving more than half a million participants, showed that air pollution from particulate matter less than 2.5 microns in size is important in determining the risk of death from heart disease. Incineration releases such particles, and it is of concern that there appears to be no reference to the size and the amounts of particulate matter that may be emitted from the incinerator in the license issued. The recent Health Research Board report, did not consider particulate matter of this size and in any event stated that we did not have adequate surveillance methods to detect adverse health effects from incineration.

The second report investigated congenital anomalies, still births and deaths shortly after birth and found an increased incidence of these conditions in the vicinity of modern incinerators. We do not have a national register of congenital malformations.

Finally, a review of the epidemological literature published in 2004, found that significant exposure-disease associations were reported by to thirds of the papers, focusing on cancer. Positive associations were also found for congenital malformations and residence near incinerators.

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There are no regulations in the license requiring that adverse health impacts on people living locally be monitored.

In conclusion, IDEA wishes to appeal the decision to grant a license for this incinerator on the basis of adverse health effects from emissions and the inability of health surveillance systems to detect such illness.

Members of our association would be happy to discuss this matter with you in further detail at your convenience.

The required fee is enclosed.

Yours sincerely

Elizabeth Cullen

Irish Doctors' Environmental Association

045-485215

086-0617004

References:

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Adverse pregnancy outcomes around incinerators and crematoriums in Cumbria, north west England, 1956-93. Dummer TJ et al Journal of Epidemiology and Community Health 2003; 57: 456-61

Health effects of exposure to waste incinerator emissions: a review of epidemiological studies Franchini M et al Ann 1st Super Sanita 2004;40(1):101-15