

Summary of input for NIA by Brian Hanratty. 14 March 2005

1. "In a newspaper interview, Dr Kelly was heard to say 'we will get domestic waste incinerators, beginning with the Indaver project in Meath where planning approval has been secured, though a judicial review is awaited'." (as reported by The Irish Times on 27/08/2003 It is regrettable that Ms Kelly is not present to clarify if she has been quoted correctly.

2. As a lay person, I would have concerns that

- the licence is for five years (Point 1.11 – page 7) ... too long, given advances in monitoring toxic substances such as dioxin, and given innovation in waste management
- it would sit on top of the largest aquifer in North East Ireland (Point 3.2.1 – page 10) (see also Point 6.12 on Page 18)
- it doesn't specify how SECURE storage capacity for ash is (Point 3.8 – page 11)
- the Gas Main for the North East runs under the site (Point 3.15 – page 12)
- the chimney has to be raised by 25 metres (Point 3.19 – page 13) from 40M to 65M OD (is this unusual that an application could have miscalculated so much ?)
- does 3.22 (Page 14/15) give us adequate protection from emissions ?
- do Sections 4, 5 and 6 (Page 16 et seq and Schedules B & C) give us adequate protection ?
(and how practical/achievable are the conditions proposed?)
Point 6.3 suggests the EPA would not notify the community of any change to the licence
- Again, how robust/achievable are conditions in Sections 8 et seq
- There are no specific proposals in relation to monitoring public health impacts, both benchmarking background levels of toxic substances/emissions in advance of commissioning the incinerator, and afterwards. This is a major flaw, and as the EPA does not have the medical expertise in these matters, it should not be issuing a licence that disregards human health by having no parameters relating to the specific protection of human health, which should be the priority in assessing any licence application.

Schedules B & C set out some key issues – again, are these appropriate & achievable ?

3. The role of the EPA as the "full back" in the event of breaches of licensed conditions needs to be independently assessed. Their approach to enforcement of IPC licences gives rise to concern – see their most recent Annual Report (2002!) and Report on IPC Licences (2002!) and a breakdown of the costs and fines imposed on www.epa.ie. Based on this, the EPA is not effective in protecting the public's interest from both a health & environmental perspective. The requirement for companies to carry out "on-going monitoring of their own operations" must be called into question as in the Irish Times of Friday last, March 11, another company is accused of filing misleading reports with the EPA.

Self regulation is "no regulation."

4. Despite Indaver's claims re their focus and investment in relation to safety, one of their Belgian incinerators breached licenced emission levels for several weeks, undetected. A similar incident in Ireland (involving another company) is reported in last Friday's Irish Times (see 3 - above)

5. As well as public health, the matter of the Boyne Valley's exceptional heritage is affected by this proposal. See Professor George Eogan's comments to the NIA – as the world's leading Expert on Bru na Boinne, he also raises serious concerns.

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re. Proposed incinerator at Carranstown, Duleek, Co. Meath

To Whom it may concern

It is possible that emission from the proposed incinerator could have a polluting effect on the Bugh na Boinne megalithic tombs, in particular the art which constitutes Europe's greatest assemblage, a virtual open air art-gallery.

The maintenance of the rural setting of Bugh na Boinne is essential but the proposed stack, due to its height, will seriously impinge on that aspect and accordingly from the environment and place in the landscape.

George Eogan

The Department of Health has told the Health Service Executive (HSE) that up to 2,000 jobs will have to be shed from the health services around the State.

The *Irish Times* understands that the Department has suggested that these should be mainly managerial and administrative grades.

The Department has told the HSE, which took over responsibility for running services around the State six weeks ago, that the numbers currently employed are well above the official

employment ceiling set down by the Government.

The HSE, in a statement to *The Irish Times* last night, confirmed that it was "assessing" the employment numbers with the Department of Health.

A spokeswoman said the figures involved in the discussions between the HSE and the Department were "estimates", and that the situation had developed historically. The issue would be addressed over a period of time without impacting on services for patients and clients.

Sources close to the Department of

Health said the issue over staffing numbers had come to light in recent weeks following the amalgamation of health boards and health agencies into the HSE as part of the Government's health-care reforms.

There are currently around 98,000 people employed in the health services.

The Department of Health has told the HSE that this is around 1.4 per cent above the ceiling for the health sector set out in a Government decision in December 2002.

Sources said that, depending on how the figures were calculated, this

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EU report finds air pollution kills 310,000 Europeans annually

FRANK McDONALD,
ENVIRONMENT EDITOR

Air pollution is killing more than 300,000 Europeans annually and costing EU countries €80 billion a year in sick leave, according to the latest assessment of air quality by the European Commission.

The Commission's report, which is to be presented today to the Clean Air for Europe steering group in Brussels, also found that air pollution is reducing the life expectancy of Europeans by almost nine months on average.

A map with the report shows that the problem is at its worst in Belgium, the Randstad area of the Netherlands, northern Italy and new member-states - particularly the southern part of Poland and the central part of Hungary.

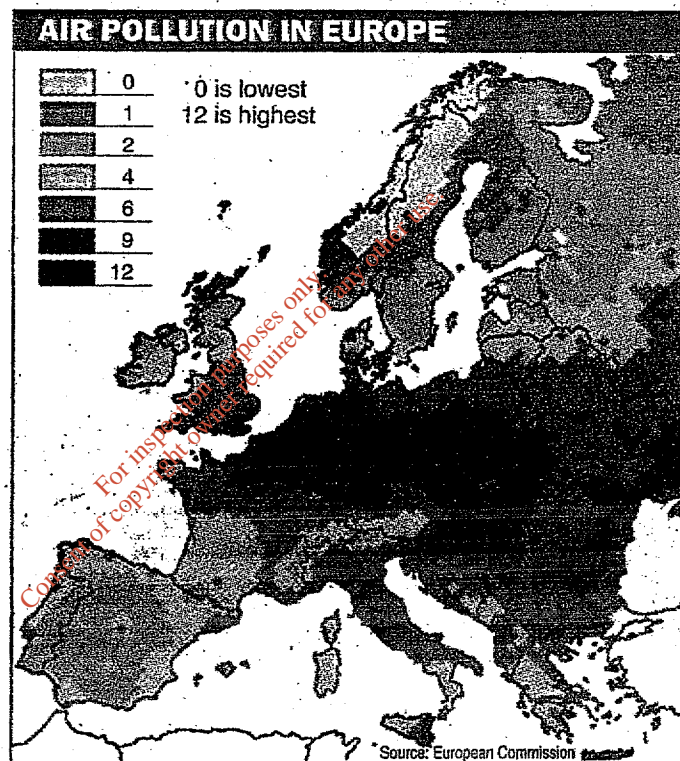
Ireland is shown relatively low down in the scale, though there are regional variations. The east and south has more air pollution than the west, north-west and south-west, reflecting differences in population, industrial development and traffic.

Overall, the report equates the premature deaths of 310,000 people a year with the loss of over three million life years. It also notes that every working European is on sick leave for at least a half-day a year due to illnesses caused by air pollution.

The main pollutants of concern for human health are fine dust particles, known as PM₁₀, which can penetrate deep into the respiratory tract, and ground level ozone, or photochemical smog mainly caused by traffic.

In its most recent review of Ireland's environment, published last May, the Environmental Protection Agency (EPA) also identified pollution from rapidly increasing road traffic as "the primary threat to the quality of air in Ireland".

The results of monitoring, which showed high levels of nitrogen dioxide levels in some



parts of central Dublin, indicated that compliance with the stringent new NO_x and PM₁₀ standards "may present problems in some urban areas".

Abatement of PM₁₀ pollution would be "much more difficult" than eradicating winter smog in Irish cities in the early 1990s. To cut PM₁₀ might even involve short-term traffic bans, which would represent a major new challenge for local authorities.

The European Commission's report was produced as a prelude to the adoption of a new "Thematic Strategy on Air Pollution" in May 2005. This strategy will set objectives on considerably reducing premature deaths and illness caused by air pollution.

It aims to reduce by three months the nine-month loss in average life expectancy from exposure to PM₁₀ between now

and 2020 as well as cutting the estimated 288,000 premature deaths caused annually by this pollutant by 80,000. The strategy also sets targets to reduce the 3 million life years lost annually by 1.1 million and the estimated 83,000 serious hospital admissions every year of people suffering from PM₁₀-related illnesses by 30,500.

These improvements are to be brought about by implementing more effectively current policies to combat air pollution, such as vehicle exhaust limits, national emissions ceilings, industrial pollution controls and air quality laws.

However, the report concedes that air pollution will continue to cause "very significant adverse impacts on human health" in 2020 - including more than 200,000 premature deaths a year.

Air pollution is worst in Belgium, the Netherlands, northern Italy