

OPEN LETTER TO E.P.A.

7th March 2005

From; James Rountree
Sellers,
Nobber,
Co. Meath

Re. Use and storage of deep frozen split samples to represent farmer baseline and monitoring interest for dioxin test

Dear Sir/Madam,

This letter is delivered to the chairman of the E.P.A Oral Hearing into Indaver Incineration Licence (7/3/05) in the Boyne Valley Hotel, Drogheda, by James Rountree (objector). It's independent of the Hearing, but it should be discussed nonetheless.

I have concern that there is a question of legal enforceability on the farmers side under the above regime. If a sample has been stored for a period of 1 year or more I feel that it's open to any incineration company to say what the relevant research has not been done and that no one knows what might be happening in the sample bottle. A technical point that would frustrate farmer interests. Also there is a question about the security of the sample. These samples can be used for information purpose only.

Please note the reference to a specified competent person in my letter of objection.

Please note attached copy of IFA Submission to E.P.A.

Please note attached copy of VETINARY IRELAND statement on Incineration and Landfill.

We must have a mutually satisfactory, transparent and workable monitoring regime. A report is needed.

I do not know much about legal matters but I do have ideas about justice

Yours

James Rountree

19th November, 2004

Environment Protection Agency
Johnstown Castle
Wexford

**Re: Proposal to Develop a Waste Incinerator at Carranstown, Duleek,
Co. Meath**

Dear Sirs,

I understand that the Agency is currently engaged in the consideration of an application for a waste licence by the operators of a proposed waste incinerator to be located at Carranstown, Duleek, Co. Meath. On behalf of the Meath and Louth Executives of the Irish Farmers' Association, we wish to submit the following comments for your consideration:

1. The operation standards and management systems required by the Agency of the operators should be to the highest international standard.
2. The operators should be required to conduct a baseline survey of the existing quality of the environment in the area of the proposed development, to include an assessment and sampling of the quality of agricultural production so that any impacts of the development on the local environment and agricultural production can be fairly identified and assessed and ensure that farmers' livelihoods are protected.
3. All monitoring data on the operation of the development should be made available in a timely and straightforward manner that can be easily assessed and understood by individuals who may not be qualified in certain environmental and chemical sciences.
4. Operational standards in relation to access roads, gateways, fencing should be to the highest international standards.
5. The operators must ensure that there is no adverse environmental impacts or nuisance on the local community arising from the operation of the facility.
6. A comprehensive decommissioning programme must be put in place at the outset.

I trust that you will take into consideration IFA's views and comments in your consideration of the developers' application for a waste licence.

Yours sincerely,

Jim Devlin
Executive Secretary
IFA National Industrial and Environmental Committee

**VETERINARY IRELAND VETERINARY PUBLIC HEALTH
COMMITTEE**

**POLICY STATEMENT ON VETERINARY PUBLIC HEALTH
IMPLICATIONS RELATING TO LANDFILL AND WASTE
THERMAL DESTRUCTION SITES.**

The use of landfill and thermal destruction sites for disposal / treatment of waste could potentially pose a health risk to local and distant human and animal populations but this risk may be avoided by biochemical, microbiological and toxicological monitoring of water, air, soil, vegetation, and effective bio-security and site management can be implemented. The surveillance of animals in the vicinity of such sites can offer additional valuable information in these regards.

However, there are also many alleged health risks associated with the use of incinerators and landfill sites which cause public concern. Investigations of increased morbidity and mortality in humans and animals as a result of alleged environmental contamination may be controversial. Incontrovertible proof of cause and effect in these circumstances may be difficult to establish. The potential for bioaccumulation of chemicals / toxins in animal and human tissues and the latency period between exposure and possible side effects should be considered.

It is this Committee's contention that the use of animal surveillance systems to establish baseline data on animal health and productivity (including harvesting and storage of tissues) can provide scientific data to reassure the authorities and the public and may counter misinformation. Multidisciplinary animal health surveillance systems can allow for rapid access to reliable information in the event of industrial accidents or allegations of environmental / foodchain contamination.

An example of the benefits of this concept was demonstrated recently when 11 years of stored milk samples (1991-2001) from County Cork were sent to Germany for dioxin analysis (dioxin is concentrated in milk). The results recorded a 60% decline in the level of dioxin over the ten-year period. (FSAI News Vol. 4, Issue 4, July 2002)

8 July 2003