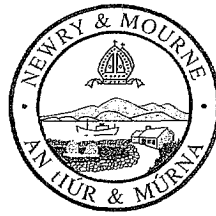




Teach Uí Aogáin,
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An tIúr,
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Comhairle an Iúir & Mhúrn Newry & Mourne District Council

Cléireach & Príomhfheimeannach ~ Clerk & Chief Executive
Thomas McCall

Ár dTag / Our Ref:

Bhur dTag / Your Ref:

Dáta / Date: 24 February 2005

OBJECTOR: NEWRY AND MOURNE DISTRICT COUNCIL

Subject Matter of Objection: Proposed Waste Licence Reg. No. 167-1

Applicant: Indaver Ireland

Location: Carranstown Co Meath

This Council has serious concerns in relation to the proposed decision of the EPA to issue a licence for this facility.

The stack servicing the plant is 65m tall and is located some 40km from the boundary of this district.

It is directly up-wind and stack emissions are transported over long distances.

Consideration must be given to the transboundary impact of gaseous emission such as dioxins, furans and fine particles.

All of the foregoing have extremely small tolerances with respect to their impacts on health and the environment.

Persistent organic pollutants when widely distributed remain in tact, accumulate in body fat and are extremely toxic.

Fine particles less than 2.5 microns are also important contributors to ill health and may be transported over long distances. No reference is made to the size of such particles emitted from the stack and how they will be monitored at distance from the plant.

The Council contends that there is a real possibility that inhabitants of this district will be subjected over time to exposure to unacceptable levels of dioxins and particulate matter if this licence is so granted.

Finally, the Council would also submit that no provision was made for the assessment of the transboundary impacts of such a major industrial plant as is required under EIA Directives.

The 1979 Geneva Convention on Long-range Transboundary Air Pollution

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The Convention on Long-range Transboundary Air Pollution is one of the central means for protecting our environment. It has, over the years, served as a bridge between different political systems and as a factor of stability in years of political change. It has substantially contributed to the development of international environmental law and has created the essential framework for controlling and reducing the damage to human health and the environment caused by transboundary air pollution. It is a successful example of what can be achieved through intergovernmental cooperation.

The history of the Convention can be traced back to the 1960s, when scientists demonstrated the interrelationship between sulphur emissions in continental ~~<xml:namespace prefix="st1 ns="urn:schemas-microsoft-com:office:smarts" />~~ Europe and the acidification of Scandinavian lakes. The 1972 United Nations Conference on the Human Environment in Stockholm signalled the start for active international cooperation to combat acidification. Between 1972 and 1977 several studies confirmed the hypothesis that air pollutants could travel several thousands of kilometres before deposition and damage occurred. This also implied that cooperation at the international level was necessary to solve problems such as acidification.

In response to these acute problems, a High-level Meeting within the Framework of the ECE on the Protection of the Environment was held at ministerial level in November 1979 in Geneva. It resulted in the signature of the Convention on Long-range Transboundary Air Pollution by 34 Governments and the European Community (EC), including the Britain and Ireland. The Convention was the first international legally binding instrument to deal with problems of air pollution on a broad regional basis. Besides laying down the general principles of international cooperation for air pollution abatement, the Convention sets up an

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institutional framework bringing together research and policy.

The Convention on Long-range Transboundary Air Pollution entered into force in 1983. It has been extended by eight specific protocols:

Protocols to the Convention

The Convention has been extended by eight protocols:

The 1999 Protocol to Abate Acidification, Eutrophication and Ground-level Ozone; 31 Signatories and 16 ratifications. Will enter into force on 17 May 2005. (Guidance documents to Protocol adopted by decision 1999/1).

The 1998 Protocol on Persistent Organic Pollutants (POPs); 22 ratifications parties. Entered into force on 23 October 2003.

The 1998 Protocol on Heavy Metals; 24 ratifications parties. Entered into force on 29 December 2003.

The 1994 Protocol on Further Reduction of Sulphur Emissions; 25 Parties. Entered into force 5 August 1998.

The 1991 Protocol concerning the Control of Emissions of Volatile Organic Compounds or their Transboundary Fluxes; 21 Parties. Entered into force 29 September 1997.

The 1988 Protocol concerning the Control of Nitrogen Oxides or their Transboundary Fluxes; 29 Parties. Entered into force 14 February 1991.

The 1985 Protocol on the Reduction of Sulphur Emissions or their Transboundary Fluxes by at least 30 per cent; 22 Parties. Entered into force 2 September 1987.

The 1984 Protocol on Long-term Financing of the Cooperative Programme for Monitoring and Evaluation of the Long-range Transmission of Air Pollutants in Europe (EMEP); 41 Parties. Entered into force 28 January 1988.