

**Submission to the EPA on the Proposed Hazardous
Waste Incinerator in Cork Harbour.**

East Cork Safety and Environment

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Submission to the Environmental Protection Agency through East Cork Safety and Environment by

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We being councillors in towns within the catchment area affected, would like to oppose the granting of a Waste Licence for a hazardous waste incinerator in Ringaskiddy, Cork Harbour. We would like to object on the following grounds:

1. **negation of democracy:** Overwhelming public opposition should be given consideration as well as the absence of incineration in any of the strategic plans for the area. Democracy must play some part in the planning and licensing process.
2. **It is contrary to National Waste Management Plan.**
3. **No consideration of health or environmental concerns.** Health and environmental concerns must be considered before granting a licence. Sufficient research has not been carried out nor monitoring programmes put in place assess the dangers to health and the environment for such a proposal.
3. **No viable emergency plan.** Because of the layout of Cork Harbour no adequate emergency plan can be put in place.

1. Democracy.

(a) One of the most striking aspects of the process of building an incinerator in Cork Harbour has been the almost universal opposition to it in the wide catchment area it will affect. The opposition to the incinerator has been coordinated by well supported groups reflecting public opinion as well as most local political representatives. The previous Councillors in Cork County Council made clear their unanimous opposition to the proposal in 2003. This position was again reiterated by the newly elected council in 2004. The opposition is loud, heartfelt and vocal but nowhere has been listened too or given expression by any of the statutory bodies involved in the application to build a hazardous waste incinerator.

(b) In addition the relevant statutory authorities have drawn up a number of plans to govern the development of the area which do not include such an incinerator. These include:

Cork Area Strategic Plan. This plan makes no provision for an incinerator in the area. Its primary aims are to remove dirty industry and to develop Cork Harbour for education, leisure and recreation. The proposed incinerator would dominate the newly built National Maritime College.

Cork County Waste Management Plan Incineration is not included in this plan

Cork County Development Plan: The proposed incinerator materially contravenes this plan.

(C) An Bord Pleanála: An exhaustive oral hearing was held in to this proposal and the Boards inspector recommended on fourteen grounds that the application be refused. His recommendations were overturned and not addressed by the Board.

(D) Second Incinerator. It has been brought to our attention that the EPA has granted a second draft licence to Indaver for a second municipal waste indicator which has not even been applied for. Cork Harbour Alliance for a Safe Environment believes this could mean that a second incinerator might not be subject to the planning process. If this is accurate, it amounts to a flagrant abuse of the democratic process.

(E) The complete lack of consideration for public opinion, no matter how well informed, has created great cynicism amongst the general public for the democratic accountability of the planning and licensing process.

2. Contrary to the National Hazardous Waste Management Plan.

(a) Government waste policy is in a mess, ill thought out, contradictory and clearly not working. Rapidly increasing service charges mean that domestic rubbish are piling up in Cork City. There is increased use of home burning, and the increased illegal dumping of waste. Government implementation of waste policy is ill thought out, contradictory and clearly is not working. While municipal waste policy is not of direct relevance to the application, it is indicative of what happens when the National Hazardous Waste Management Plan is not adhered to. The primary objective of the plan is waste prevention. While waste prevention is not addressed coherently, chaos ensues. In the case of hazardous waste, little effort has been put into waste prevention.

(b) It is the experience in other jurisdictions that waste incinerators because of their cost, need to be 'fed' constantly and are detrimental to any incentives for waste prevention, recycling and reuse a primary aim of the National Hazardous Waste Plan

(c) The secondary objective of the Plan is to manage any hazardous waste which cannot be prevented. No evidence has been produced that would indicate that a serious attempt has been made to prevent, reuse or recycle the present output of hazardous waste.

4. **No consideration of Health and Environmental Concerns.** The argument put forward by the EPA in granting a draft licence, that an incinerator is a danger to the health of people or to the environment does not stand up. Insufficient research, information and lack of monitoring programmes make it unreasonable to reach such a conclusion.

(a) It is extraordinary that nowhere in this process have the health and environmental factors affecting this application been dealt with. No body is responsible for the very serious health and environmental concerns raised by the application.

(b) The effects of global warming, coastal erosion, flooding and unfavourable weather conditions are all aspects which should be taken into consideration by the EPA.

(c) There is no health monitoring system in place. This again is extraordinary, Despite the high densities of population, there is no system to monitor the health affects of this proposed incinerator on the surrounding area. This is despite the known dangers of emissions from incinerators.

(d) The EPA did not consider health grounds before granting a draft licence. Again this is a serious lacking and should be addressed.

(e) Lack of Expertise. A government body, the Health Research Board stated in 2003 that there is not the expertise in Ireland to adequately assess the dangers to health and the environment for such a proposal.

(4) No Emergency Plan.

(a) Two major centres of population in the harbour, Cobh and Ringaskiddy can be only exited by one route each. In the event of an emergency each of these populations would be dependent on one road out.

(b) The present road system is already under great strain and unable to cope with the existing traffic not to mind the increased and dangerous lorry traffic this proposal would attract.

(c) The National Maritime College is next door to the incinerator and in the event of an emergency it and Hawlboline Island would be very difficult to evacuate.

(d) There are no emergency services close to the proposed incinerator.

Conclusion:

Overwhelming public opposition should be given consideration as well as the absence of incineration in any of the strategic plans for the area. Democracy must play some part in the planning and licensing process. An incinerator is against the thrust and direction of the National Waste Hazardous Plan. Health and environmental concerns must be considered before granting a licence. There is no viable emergency plan able to be put in place because of the geographic lay out of the harbour. This licence should not be granted.

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