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combined residents against incineration

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14th November 2006.

The Secretary
Environmental Protection Agency
Johnstown Castle Estate,
Co Wexford.

Applicant Dublin City Council

Development: Proposed Mass burn incinerator and associated facilities.

Site: Pigeon House Road, Ringsend Dublin 4

Reference: W0232- 01

Pursuant to the notice issued by Dublin City Council on the 30th June 2006 and as the secretary of the above community based origination which represents the various residents associations in Ringsend, Irishtown, Bath Avenue & District, Sandymount and Merrion we urge the EPA to strongly refuse a licence to this project.

The proposed facility is a flawed, dangerous, extravagant, and totally unsuitable solution to the waste management of the Dublin Region and the site chosen is grossly unsuitable and a much smaller incinerator in this area was refused permission over ten year ago and nothing has changed in the area there is no new infrastructure, and planning permission has been granted by DCC for thousands of homes in close proximity to this site.

Our objection to the granting of a waste licence is on the following grounds

1. EU waste pyramid conflicts with the proposal to build a mass burn incinerator. The development of a thermal treatment plant of the proposed capacity is not consistent with EU principles of waste management and the waste hierarchy as outlined in the Dublin Waste Management Plan. The hierarchy in descending order of priority favours waste prevention and minimisation. Reduce, reuse and recycle Mass burn incineration with out prior segregation of waste flies in the face of proper waste management.

2. The lack of meaningful community involvement, real consultation, or relevant information.

Article 12 of Directive 200/76/EC on the incineration of waste and article 15 of Directive 1996/61/EC concerning integrated pollution and control mandates certain requirements regarding access to information and public participation in pollution control and incineration process

3. Concerns about Community Health issues. These issues have not been addressed and I attach a statement from Dr Anthony Steins which deals with this issue.
4. Concerns about enforcement, based on bad experience, the Dublin Waste Water Treatment Plant which we were given a guarantee prior to its construction would be odour free, and the EIS stated that there would be no foul odour outside its perimeters and this is breached on a daily basis and there appears to be no method of enforcement.
5. Concerns regarding traffic congesting which is already unendurable. There is serious traffic congestion in the area at present and the existing roads just can not deal with any further increase in traffic. One of the main reasons for chosen this site was that the Easter By Pass would be in place to deal with the 800 plus lorries per day which will be required to feed this plant. There are no plans or funding available to build this by pass at present.
6. Concerns for natural heritage and unique local amenity. During the construction phase of the Sewerage Plant which is directly adjacent to the proposed incineration plant 2.5 hectors were allocated to and laid out to facilitate the Brent Geese and other migratory wild life. This was a condition of the granting of planning permission as there habitat was eroded by the development. This land is now part of the Nature Park. This Incinerator will directly infringe on the habitat and the enjoyment of the nature park by the people of Dublin.
7. Avoidance of BAT commitment for economic and political reasons. The EIS gives various different comments on best available technology, it is very clear from reading the EIS that this will depend on cost and the political will to pursue the best available technology regardless of price this is not satisfactory from our community point of view, nor for the environment and does little to instil confidence in our community for our health and well being.
8. Concerns over vague proposals for incoming and outgoing waste especially ship loading and storage. This is a serious issue and is not adequately addressed in the EIS, and what will happen in the future when the EU may outlaw cross border shipment of waste. We are seriously concerned by the lack of mean full information available to us about the storage of the toxic and fly ash in our community and the transport of this ash off site. Should a

shipment be rejected, and returned to source where will this dangerous product be stored and dealt with?

9. Lack of definition for proposed capacity of the plant. Such as is sewerage additional load? Is the plant for 500,000, or 600,000, or in excess of 750,000 tonnes? A application notice to the environmental protection agency for a waste licence for 600,000 tonnes was published in the daily papers yet the application to the EPA is in excess of this amount, the notice of the proposal to apply to the EPA in the Irish Times news paper on the 30th of June is there fore misleading
10. Proper planning and control of proposed construction, which appears to be 24 hours per day, seven days per week for in excess of 3 years during the construction stage would cause an intolerable situation on the people and environment in our community. Proposed delivery hours of waste to the plant are very confusing and again would impinge on the health and enjoyment of the people of our area and indeed the people of Dublin who enjoy the amenities of the area. It would lead to possible health problems and cause damage to the environment, and the natural habitat.
11. Concerned over who is over all responsible for the plant given the waste application is from DCC and Elsam are to design, build and operate the plant. Who will be responsible should the licence be breached, if the plant was to closed down what are the implication for the waste management of the greater Dublin area and even more important who is answerable to the community.
12. The community have serious concerns that the EIS did not address the effects on the environment of the proposed development; it is born out by the request by An Bord Pleanala to Mr Matt Twomey, Engineering Department DCC for further information as the plans are not to scale. Which would make it very difficult for a community based origination to make relevant comment on the possible effect of this development on our community and the environment.

Given the half truth, confusion and lack of information available to us as a community we urge you to adopt the precautionary principle and refuse this licence application until the safety of our community and its environment can be guaranteed, and that a proper sustainable development approach is adopted to the waste management problem. Sustainable development of the Poolbeg Peninsula must be observed. If a licence is given for this proposal it will result in a flawed solution to the regions waste problem, it would create and risk to our lives and to our environment.

Yours Sincerely

Frances Corr
Honorary Secretary

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