

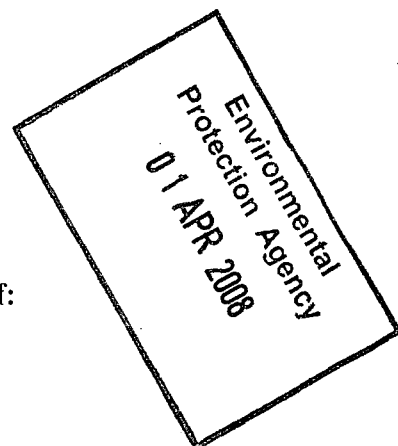
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When Replying Please Quote Ref:

Environmental Protection Agency
Johnstown Castle Estate
Co Wexford

31st March 2008

Our Ref: DFC/YO'S

Re: Objection to proposed decision of your agency.
Re: Waste Licence application by Dublin City Council in respect of the
facility at Dublin Waste to Energy Project, Pigeon House Road,
Ringsend.
Registration Number: W0232-01

Dear Sirs

We refer to previous correspondence.

Please note that nowhere on your website, capable of being downloaded, is any record of any investigation by your good selves into the Health and Safety aspects of the running of the proposed facility.

At the opening of the planning, oral hearing, a letter was handed in from the Health and Safety people, which we had not seen before and we do not know what basis this letter was given? Was it based on the plans that are before you and did you carry out an independent survey into the Health and Safety risks, because if you did, it does not appear on the website.

Further, it appears that the documents furnished to you for the waste licence, related to a previous operator, who withdrew from the project. You were informed of this by Dublin City Council, who told you that they were getting a new operator but did not furnish new documentation, which, prima facie, indicated that your decision to grant a waste licence is based upon original documentation furnished to you when the application by the City Council was made in the first instance. Please confirm that this is correct.

A further matter arises in relation to the question of witnesses. As there is no report on your website relating to the Health and Safety issues arising from a major infrastructural project such as the proposed incinerator. Obviously, these are matters which would concern you and for which you should have specialist evidence.

The only specialist evidence which we have heard, apart from one report from Dublin Port's witness, is the report of the promoter, Dublin City Council and our environment group is not prepared to rely upon Health Reports obtained by the promoter of the Incinerator. We wish to have independent Health and Safety Reports relating to emissions, transport of fly ash, the treatment of hazardous toxins, dioxins, air quality and in particular the movement of heavy vehicles through the housing estates leading to and on the Peninsula at Poolbeg. As many as three hundred trucks movements per day are anticipated with the consequent emission of exhaust fumes.

Our group is a voluntary and we are told that the specialist witnesses required to give the EPA a balanced view of the Health and Safety aspects are extremely expensive to retain.

Dublin City Council have already spent, we are told, approximately €20 million in promoting this Incinerator and they have access to whatever specialist witnesses they want.

We now submit to you that it is totally unbalanced, non transparent and undemocratic, that voluntary groups should be expected to make a case before you on the 14th April without access to the vital witnesses required to test the medical, health and safety witnesses produced by the promoters, Dublin City Council.


No offer has been made to pay the cost of these witnesses, despite requests made to Dublin City Council at many of their information sessions.

We are sure that, on reaching your decision on this application, you would be anxious to have clear evidence of both sides of the argument. Speaking for our own environmental group, Ringsend, Irishtown and Sandymount, we would ask you to consider that it is only right and proper that the proposer should be made to pay the cost of the provision of a limited number of witnesses to deal with the three questions of air quality, Health and Safety and traffic, otherwise your inspector will be listening to a one sided argument without specialist evidence from our group, which we should be able to produce if funds, similar to those available to Dublin City Council in respect of witnesses were made available to the objectors. We cannot see how you can come to an informed decision on the application for this waste licence in the absence of such specialist witnesses.

Dublin City Council have a commercial interest in the promotion of this incinerator. It is the biggest and most offensive of this type of incinerator, placed in the heart of a city which never had an incinerator. In the light of other infrastructural projects promoted by the City Council in our area and the continuous failure of these infrastructures to operate in the way intended, there is every reason to be concerned, that despite the closest monitoring, the incinerator will be no different and will, in fact, give problems. These problems should be addressed now, before the incinerator is considered further. This cannot be done without the technical expert witnesses,

which should be made available to the objectors. We would be obliged if you might consider these

Yours Faithfully


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