

EPA Oral Hearing Statement
Maria Parodi

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Recd From: Maria Parodi

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Environmental Protection Agency
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Chairperson,

As a resident of the local area and a member of CRAI, I would like to express my objection to the proposed decision to award a waste licence to Dublin City Council for an incinerator located in Poolbeg. I would like to mention that this incinerator is not in the best interest of the population or the environment and I strongly believe that this method relies on an outdated, inefficient approach to waste management.

As you are aware the Environmental Protection Agencies priorities are protecting the Irish environment and ensuring that development is sustainable. Furthermore, the EPA noted in the National Waste Prevention Programme 2006/2007 that "*waste prevention is an important strategic activity for Ireland.*" In addition, the Agreed Programme for Government 2007; which, the EPA recognises, states that "*the Government will establish new ambitious waste management targets for maximum prevention, re-use, recycling and modern waste treatment.*" In light of this, by granting a waste licence for this incinerator it is contradictory to both the EPA's current waste prevention approach and the Programme for government. This is because incineration is an outdated method for dealing with waste and the proposed incinerator will burn 600,000 tonnes of waste each year; which, is a disincentive for any ambitious re-use and recycle policies because it needs to be constantly supplied with waste to continue operating.

Ultimately, if the EPA wants to carry out a waste prevention model then we must look at the alternative approaches to incineration. Internationally, in New Zealand, San Francisco, Toronto and Seattle they are all pursuing a Zero Waste model that has significant economic and social benefits. The Zero-Waste model focuses on composting, recycling and waste prevention. By adopting this approach here in Ireland; waste is processed, remanufactured and resold. Through this, Irish recyclables, reusables and compostables will gain added value and this will generate greater revenue from waste for the Irish Economy and will assist in job creation. If a licence is granted for this incinerator, you are placing a significant barrier in the way of further exploration into sustainable approaches to waste management. If there are Zero-Waste alternatives out there that not only curtails the disastrous health and environmental effects of burning waste as Dr. Montenari had mentioned at the session last Friday; but, also generates wealth for our economy then it is a win-win situation.

In relation to health, it is the responsibility of the proponents to guarantee that an Incinerator at this site will not have any harmful effects on the Environment or on the health of the population in Dublin. At this point, they have failed to do so and I would stress the need for the establishment of relevant baseline health data collection at the site of the proposed incinerator. Moreover, there has been a lack of a comprehensive Health Impact Statement; even though, those who have made submissions to the EPA have requested one to be carried out. In regards to effects of this incinerator on human health, there has been no clear confirmation that an ongoing health surveillance

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system will be put in place to ensure that bio-monitoring will be undertaken to detect any abnormal levels of bio toxins present in the air.

Ultimately, without a baseline health assessment carried out which includes a monitoring structure; there will be no comparison point in the future. This means that the effects of the particulate matter expelled from the incinerator will not be tracked; which will alleviate the accountability factor for the proponents of the incinerator if the emissions lead to an increase in respiratory morbidity or cancer. The EPA should not grant this licence due to the lack of data and concrete measures in place to ensure the health of the population.

I urge the EPA to take into consideration all of the valid objections made by groups and individuals that have been expressed over the last week of this oral hearing. Particularly, those concerning the impact of the proposed facility on climate change and CO2 emissions, the impact of nano-particles emitted from the incinerator on human health and the environment. As well as the impact this will have on the DDDA residential development plans for the Poolbeg Peninsula. With this in mind, I would ask the EPA not to grant a waste licence for this Incinerator.

Sincerely,

Maria Parodi
CRAI Member

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