

OH Sub No. 17

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Environmental Protection Agency  
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ORAL HEARING  
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# Towards Zero Waste in Dublin - No incinerator on Poolbeg

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Sinn Féin Oral Submission to the Environmental Protection  
Agency

April 2008



**Sinn Féin**

BUILDING AN IRELAND OF EQUALS

Sinn Fein will be objecting to the granting of a license for the operation of the proposed incinerator on the Poolbeg Peninsula under the following headings:

- Traffic.
- Material Assets
- Air, Climate and Noise
- Site Selection Criteria
- Contravenes City Development Plan
- Health Research & Environmental Impact
- Zero Waste

We ask the Environmental Protection Agency (EPA) not to grant a license for the operation of the proposed incinerator on the Poolbeg Peninsula:

1. Sinn Fein notes that the likely significant impacts of traffic generated by the proposed development are assessed in terms of the capacity of the existing road network based on level of service. In particular the likely significant traffic impacts are based on the level of service not being adversely impacted upon yet there are no figures to substantiate this. We request to submit details of the calculations/basis for the assessment of existing level of service. We also consider that the traffic impacts should also be assessed in terms of Annual Average Daily Traffic (AADT) counts for the network. There will be serious consequences to the volume of truck movements through this part of the city. The trucks will be gaining entry to the plant in the vicinity of a built up/residential area. It must also be noted that there are proposals to develop the Poolbeg Peninsula with a strong emphasis on residential development. Several hundred trucks gaining access to the proposed incinerator plant will have an adverse effect on both the residents and the Irishtown Wildlife Park.
2. The future traffic projections and the environmental impact are up to and including year 2006. We consider that the traffic projections, sand the impact, should be expanded to assess the impacts on the road network for specific time intervals over a 20 year life based on traffic growth percentage increases,

effects of future traffic changes, existing and permitted development in the area.

3. The Minister for Environment and Local Government's Policy Statement (October 1998) advocates that local authorities working closely with local communities should utilise a proportion of income from waste charges and gate fees to mitigate the impact of waste management facilities on communities through appropriate environmental community projects. Such measures might include:

- A Community Liaison Committee,
- Provision of a public education area within the administration block for environmental education needs and,
- Utilise a portion of income from waste charges for appropriate environmental improvement projects to mitigate the impact of the proposed development on the community.

Having regard to the nature and extent of the proposed development i.e. regional waste management facility, we consider that similar measures should form part of the subject proposal. We request that a revised EIS take account of the need for the provision of a community liaison committee, environmental education needs and improvement projects.

4. We consider that the EIS section on noise does not adequately assess the likely significant impacts of the proposed development on noise generated during the construction and operation phases. There are very wide variations in noise levels, particularly at nighttime noted over the survey period that go unexplained or interpreted. It is considered that a more detailed assessment of existing day and nighttime background noise levels is required. In particular the use of additional noise monitoring locations is deemed necessary to assess background noise levels and the contribution of existing noise sources in the area. We consider that the cumulative noise effects of the proposed development have not been adequately addressed in the EIS. It is also noted that information is not available in relation to specific noise sources. We request the provision and

interpretation of noise survey data, highlighting any known significant noise sources together with an assessment of their contribution(s) to ambient noise levels and any difficulties in compiling information.

5. *"The Poolbeg Site has been identified through a systematic assessment of areas suitable for thermal treatment in the Dublin Region. A site selection assessment was carried out in 1999 by MC O'Sullivan Consulting Engineers on behalf of the local authorities of the Dublin Region, which identified the Poolbeg site as the preferred site. The other three short listed sites were again visited during the preparation of this EIS. Each of these three sites at Robinhood (Walkinstown), Cherrywood (Loughlinstown) and Newlands (Clondalkin) are still zoned industrial and are currently (June 2006) vacant".* A site assessment was carried out in 1999 by MC O'Sullivan Consultants. Were EIS statements produced for the three other sites? If not, why not? What criteria were used for the selection of Poolbeg as the site? According to the EIA Directive, EIS statements are required for all the proposed sites.

6. This proposal contravenes the Dublin City Development Plan 2005-11.

- **Policy U4:** It is the policy of the elected members of the Dublin City Council to oppose the siting of an incinerator on the Poolbeg Peninsula.
- **City Development Plan** has the Poolbeg Peninsula zoned Z7A, Employment (heavy-excluding incinerator/waste to energy plant)

#### 7. Health Research & Environmental Impact

Member States of the European Union shall take the necessary measures to ensure that waste is recovered or disposed of without endangering human health.

I would urge the EPA to take into account the following report, Health Research Board Report entitled, 'Health & Environmental Effects of Landfilling & Incineration of Waste', a literature review. A Summary of the findings:

**(a) Riskassessment**

Ireland presently has insufficient resources to carry out adequate risk assessments for proposed waste management facilities. Although the necessary skills are available, neither the personnel nor the dedicated resources have been made available. In addition, there are serious data gaps (addressed under point (c) below). These problems should be rectified urgently.

**(b) Detection and monitoring of human health impacts**

Irish health information systems cannot support routine monitoring of the health of people living near waste sites. There is an urgent need to develop the skills and resources required to undertake health and environmental risk assessments in Ireland. This should be considered as an important development to build capacity in Ireland to protect public health in relation to potential environmental hazards. The recommendations in the Proposal for a National Environmental Health Action Plan (Government of Ireland 1999) could form a basis for this.

The capacity (in terms of facilities, financial and human resources, data banks, etc.) must be developed for measuring environmental damage, and changes over time in the condition of the environment around proposed waste sites and elsewhere. There is a serious deficiency of baseline environmental information in Ireland, a situation that should be remedied. The lack of baseline data makes it very hard to interpret the results of local studies, for example around a waste management site. Existing research results should be collated and interpreted as a step toward building a baseline data bank. A strategically designed monitoring programme needs to be initiated that can correct deficiencies in current ambient environmental monitoring. In addition, capacity needs to be built in environmental analysis. In particular, Irish facilities for measuring dioxins are required, and should be developed as a priority. However, the high public profile of dioxins should not distract attention from the need for improved monitoring

of other potential pollutants.

**(d) Risk Communication**

Qualitative studies about waste management perceptions revealed a diversity of opinion about waste management issues generally, and about the links between waste management and both human health and environmental quality. To facilitate public debate on the issues of waste management policy and effects, a systematic programme of risk communication will be necessary. This should concentrate on providing unbiased and trusted information to all participants (or stakeholders) in waste management issues. Public trust, whether it is placed in the regulators, in compliance with the regulations or in the information provided, will be fundamental in achieving even a modicum of consensus for any future developments in waste policy in Ireland.

**8. Zero Waste**

Please find attached a copy of the Sinn Fein submission to the review of the Waste Management Strategy 2004. Sinn Fein believes that if this strategy was adopted and applied by Dublin City Council it would have a hugely beneficial effect on the environment as it would remove the need for any incinerator plant and thus remove the environmental side effects of the proposed plant.

**Conclusion**

We believe we have clearly outlined the reasons why The EPA should not grant a license to the operators of the proposed incinerator. We hope you find the arguments compelling enough to refuse a license.