



Mr Michael Kelly
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Date

Our ref.

Your ref.

25 March 2003

MK/cm

re: Baseline Health Data

Dear Mr Kelly

I write to you in respect of concerns expressed by the public regarding human health in the vicinity of waste facilities, including landfill sites and incinerators.

The Environmental Protection Agency has statutory obligations set out in the Environmental Protection Agency Act, 1992, the Waste Management Act, 1996 and other legislation. The brief of the Agency includes the following:

- Licensing and regulating activities specified in legislation with a potentially high risk of causing pollution, including industrial installations and waste facilities
- Enforcing environmental legislation in relation to specified activities in both private and public sectors
- Monitoring and reporting on the state of the environment

To date the Agency has licensed waste facilities such as existing landfills, new landfills and incinerators attached to particular industries. In granting licences for the operation of these facilities the Agency sets stringent emission limit values for pollutants and potential pollutants to meet the accepted EU standards and guidelines as a minimum requirement. In addition, the Agency evaluates the potential impact of the maximum licensed emission on the environment surrounding any facility to ensure that all EU standards for the environment and WHO guidelines will be met. If these cannot be met, then the Agency will reduce the level of emissions licensed accordingly. The Agency takes the view that if the licensed emission limit is complied with, then human health is adequately protected in line with best international practice. To ensure compliance, the Agency requires the operators of the facilities to monitor and report on specified substances, and in addition conducts its own monitoring and auditing of the facilities. The Agency is confident that this approach, coupled with the requirement on the part of the licensee, to implement environmental management plans and to operate according to Best Available Techniques

However, the public continues to have concerns regarding the health impacts of these facilities, and expresses these concerns to the Agency in written submissions and objections to the issue of licences, and in submissions at Oral Hearings of objections held by the Agency in the licensing of some facilities.

A recent report commissioned by the Department of the Environment and Local Government and carried out by the Health Research Board concluded, inter alia, that Irish health information systems cannot support routine monitoring of the health of people living near waste sites, and points to a lack of available information on the health status of residents residing near waste facilities, and a lack of baseline human health data at national, regional and county level.

The Report on the Investigations of Animal Health Problems at Askeaton, Co Limerick, carried out by Department of Agriculture, Food and Rural Development, Teagasc, EPA and the Mid Western Health Board, and published in 2001 also identified a number of issues in respect of human health data, which needed to be addressed so that proper expertise and baseline data are available in the State. Amongst other things, this report recommended a computerised system of monitoring congenital abnormalities based on the Eurocat model, a system of surveillance of morbidity in general practice, and the structuring of information systems within the health service to allow easy epidemiological investigation.

The issue of baseline health data and adequate health information systems is a matter appropriate to the Department of Health and Children and the Health Boards. The Agency would support the recommendations on these matters referred to in the above reports, the implementation of which should help to alleviate the legitimate public concerns about the health impacts of the very necessary infrastructural developments in a modern economy.

If you would like further clarification of any of the issues raised here I would be pleased to discuss them with you.

Yours sincerely,

Mary Kelly
Dr. Mary Kelly
Director General

c.c. Ms Geraldine Tallon