

**Environmental Protection Agency**

**Oral hearing into proposed decision to grant a waste licence to Fingal  
County Council for a large-scale engineered landfill at Tooman and  
Nevitt, Lusk, County Dublin**

OH Doc No:

8

*EPA Waste Licence Reg No W0231-01*

Rec'd From: Michael

Creeghan

Date Rec'd: 5/3/08

10.35A.M.

**STATEMENT OF EVIDENCE**

By Michael Cregan,

Quality and Safety Consultant, Independent Auditor and Inspector  
Registered Trainer for the Food Industry

**On behalf of The Nevitt-Lusk Action Group**

I am a food safety consultant, and have worked in the food industry for many years, including for multi-national companies and for An Bord Glas and An Bord Bia. During the past 12 years, I have helped vegetable producers in this area, with the assistance of An Bord Bia to develop food production to the present day high standards.

Potable water supply for food production and processing is an essential pre-requisite for entry to the food supply chain, and to ensure that food will be fit for human consumption.

Standards of food production are continually increasing, and the need for an exceptionally high quality of water is part of this process. Growers in the area of the proposed landfill produce high risk foods, some of which are supplied to hospitals, and may form part of the diet of people who would be very vulnerable to bacterial or chemical contaminants. Examples of such foods are:

High risk: salads, scallions, fruit, prepared foods which are not cooked before being eaten;

Medium risk: cooked vegetables, e.g., cabbage, broccoli;

Low risk: potatoes.

Clean portable water for irrigation and processing is absolutely essential for producers such as "Super Dawn".

Many other companies in the area are also producing fruit and vegetables and employing large numbers of people. These companies would be affected by any reduction in the quality of groundwater, or by dust from the proposed landfill which could carry bacteria onto growing produce.

The current emphasis on the role of locally produced food in reducing "air miles" and the current cleanliness of the area and its water and air and the perceived freedom from environmental pollution is continuing to support the huge potential of this area for food production, and of north County Dublin in particular, in the future -- provided that the environment will not deteriorate. It is important to note that landfills are a source of high CO<sub>2</sub> emissions and dust. Mechanical breakdown and recycle, compost, biodegradable techniques are much more environment and human health friendly.

Having worked in quality control in food companies using water, the costs of water quality monitoring and water treatment can be prohibitive for any medium or small company. That is why the high quality source of groundwater is vital to them, and why a supply of mains water would be unacceptable.

The perception within the food industry is that if approval were to be given for this proposed landfill, the assurances necessary to sell or supply fresh produce would require much more testing of the products and a much greater investment in state-of-the-art expansive treatment plants. Survival of the industry would become impossible. In such instances the local planning authority should be obliged to compensate such people.

Destroying high quality natural food resource in today's world shows ignorance of the need for food of a high quality fit for human consumption, and the desire for each person to have the best health.

"Health is Wealth".

Thank you for your time.

Michael Cregan

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