

Ringaskiddy  
Incinerator

Unnecessary  
Unsafe  
Unacceptable

"Short-term exposure to high levels of dioxins may result in skin lesions and altered liver function. Long-term exposure is linked to impairment of the immune system, the developing nervous system, the endocrine system and reproductive functions."  
WHO Fact Sheet

"Releases from incinerators cause a slow, but gradual accumulation of pollutants in the food chain and human body ... health effects may often only become visible and measurable after a long latency period."  
L. Hens, Human Ecology Dept, Free University Brussels

"Emission standards are based on what can be measured and what is achievable, rather than on what is safe."  
Dept. of Environment (UK) Committee

CHASE



CHASE

(021) 4815564

www.chaseireland.org  
info@chaseireland.org

## EPA Oral Hearing – what we learnt

Health – 3 undeniable truths emerged

1. The incinerator will release harmful pollutants.
2. It would be wise to assess the extent of the harm those pollutants would cause to people's health before granting a licence.
3. This assessment has not been carried out.

Medical evidence: CHASE – 5 Others – 0  
NO medical evidence has been offered by Indaver, An Bord Pleanala, or the EPA to support the assertion that the incinerator will do no harm to people's health.

FIVE medical experts, on the other hand, have presented evidence to the contrary.



Medical Evidence  
at Oral Hearings

An Bord Pleanala  
Applicant  
EPA

NONE

CHASE

✓ Toxicologist

Dr. Vyvyan Howard, Liverpool University

✓ Paediatric Epidemiologist

Dr. Anthony Staines, Senior Lecturer, UCD,  
co-author of HRB report

✓ Paediatrician

Dr. Gavin ten Tusscher, University of Amsterdam;  
member of EU technical group on bio-monitoring of children

✓ General Practitioner

✓ Irish Doctors Environmental Association

✓ Midwives Association of Ireland

## What the Paediatrician says

Effects of dioxin on child health

Dr. ten Tusscher summarized the effects of dioxin exposure on children's health as follows:

- Birth defects
- Hormone disruption
- Immunity interference
- Increased cancer risk
- Liver damage and dental problems
- Behavioural problems
- Retardation of sexual development
- Retardation in brain development

Questions to governing bodies

Is the EPA willing to stand guarantee against human and environmental harm from the proposed Indaver plant?

Will the Health Department guarantee stringent biomonitoring? Of which substances? Using which exposure limits?

Observations on governing bodies

The EPA avoids taking responsibility for health risks although they are the body needing to do so.

The Health Department has no reliable baseline data from the area and no sufficient biomonitoring system.

## What the Toxicologist says

Foetus and nursing child most at risk

The most vulnerable to the health effects of dioxin and other chemicals are the developing foetus and the nursing child.

These chemicals can affect the development of the reproductive system, the immune system, the brain, kidneys, lungs, and more. Some of these effects have been demonstrated to occur at current background levels.

All incinerators emit ultra-fine particles as a result of the combustion process. Researchers

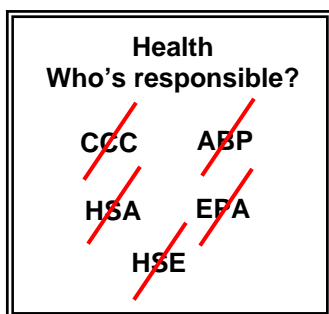
have found that even levels well within legal limits are killing people.

Incineration not a fail-safe technology

"This application should be rejected because such a plant will have adverse health effects on the most sensitive human receptors.

The level of protection offered to the public requires the continuous and flawless functioning of complex engineering solutions.

Numerous experiences in the past inform us that is simply not attainable."



*"Dioxins and PCBs remain in our bodies for many years. Our children are already exposed to concentrations that are too high. Any increase in exposure, for instance in the case of an accident, only increases the damage. It is not wise to risk the health and development of our children."*

**Dr. ten Tusscher**  
(EPA oral hearing)

*"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."*  
**EPA Director General**  
(letter to Department)

*"The Irish Doctors' Environmental Association has serious concerns regarding incineration. There is sufficient evidence of the dangers of health and environmental contamination to stop incineration now."*  
**IDEA Position Paper**



[www.chaseireland.org](http://www.chaseireland.org)

News & Views  
Questions & Answers  
Articles & Fact Sheets  
Newsletters  
Photo Gallery

Add us to your  
Internet Browser's  
Favorites list!

## What the Epidemiologist says

Dr. Anthony Staines is co-author of the Health Research Board's report to the government on the "Health and Environmental Effects of Landfilling and Incineration of Waste".

So concerned is he at the non-implementation of the report's findings that he volunteered to give evidence to the EPA oral hearing. His evidence summarised the HRB report's findings and re-emphasised the need for urgent action:

- Ireland has insufficient resources to carry out adequate risk assessments for proposed waste management facilities. This problem should be rectified urgently.
- Irish health information systems cannot support routine monitoring of the health of people living near waste sites.

- There is a serious deficiency of baseline environmental information in Ireland, a situation that should be remedied.

In particular, Irish facilities for measuring dioxins are required, and should be developed as a priority.

In addition, he stated his opinion that:

- The proposed development requires a proper Health Impact Assessment to ensure reasonable consideration of human health issues.
- The material provided in Indaver's Environmental Impact Statement falls short of any reasonable estimate of what is required.

## Health is nobody's child

**HRB Report undisputed but ignored**

Nobody (including EPA) disputes the findings of the HRB report. However:

- An Bord Pleanála considers the issue of impacts on human health to be a matter for the EPA.
- EPA considers the issue to be a matter for the Dept. of Health.

- Neither the Dept. of Health or the Health Service Executive have put their hands up to accept responsibility in these areas.

**Question:** So who is responsible for assessing and monitoring the effects of the Ringaskiddy incinerator on human health?

**Answer:** NOBODY.

## EPA oral hearing – what else we learnt

**Plant will have commercial monopoly**

Once Ireland has a hazardous waste incinerator in operation, it cannot legally export hazardous waste (BASEL convention). The Indaver plant will have a commercial monopoly.

**Operator has no relevant experience**

Indaver Ireland has no experience of operating any incinerator. Indaver NV (Belgium) has no previous experience of running the type of incinerator proposed.

Indaver NV seriously breached its operating conditions at its Antwerp incinerator. In Ireland they would have been liable for prosecution and would no longer be considered 'a fit and proper person' to operate such a plant.

**Standards a beginning not an end**

The EPA believes that once certain standards are applied then there will be no adverse effect on human health. IT IS WRONG.

- Emission limits are a compromise between economics and health. They must be seen as a beginning not an end (Dr. Staines).

- Adverse health effects are seen at levels below standard limits (Dr. ten Tusscher).
- As standards are an exercise in damage limitation, site selection guidelines are critically important.

Indaver skipped the most important of the WHO's site selection guidelines – exclusion criteria. These alone would have excluded Ringaskiddy as a suitable site.

As well as applying standards, the EPA must consider the evidence. The evidence from medical experts, in this case, is all on one side.

**EPA cannot grant a licence**

Under the Waste Management Act, the Agency is prohibited from granting a waste licence unless it is satisfied that the activity concerned, carried on in accordance with any conditions to the licence, will not cause environmental pollution.

Having regard to the definition of environmental pollution in the Act, and to the only medical evidence before it, the Agency has no power to grant a licence.