

To The Features Editor

We would be grateful if, in the public interest and for clarification purposes, you would feature the following open letter or information contained in it. We feel that our communities deserve the right to reply publicly.

OPEN LETTER TO

PJ Rudden, Business Director for RPS Group Ireland, Waste Consultants to the Government, regarding his misleading remarks abroad on the Irish attitude to Incineration.

Dear Mr. Rudden,

False impression needs to be corrected.

We are writing this open letter to you in the interests of fairness and balance.

At this critical moment, when plans are before An Bord Pleanála for the infliction of a massive waste incinerator on the city of Dublin and others are being imposed on Cork and Meath, we are appalled by speeches made by you at conferences abroad, including one in Sydney*in July 2005 and another in Copenhagen** in October 2006, in which you claimed that there was now general acceptance of incineration by the Irish people. We find this a bizarre claim, considering that there were c. 30,000 written objections to incinerator planning applications in Cork alone, not to mention those in Meath, Tipperary and Dublin. There are community groups throughout the country actively engaged in ongoing campaigns for better, sustainable alternatives that protect climate balance, natural resources and health. In light of the most recent and comprehensive French study**** showing a clear link between incinerator emissions and cancer we feel that it has never been more important to set the record straight.

You have given a misleading account of public attitudes to incineration in Ireland. You claim that "waste management is all about people" yet you deny the well founded concerns of Irish people from all walks of life who, without any public funding are taking on the combined might of central government and powerful vested interests in order to protect health and the environment for everyone and for future generations.

By contrast the Minister has allocated large sums of taxpayers' money to your company for advertising campaigns promoting plans that have incineration as a key feature.

Economists, scientists, environmental and chemical engineers, geologists, doctors and toxicologists from Ireland and abroad have presented an impressive body of evidence, based on thorough scientific and medical research, at a number of public hearings in this country. These submissions are on public record and we stand by them. It is shameful that they are being ignored and it is a travesty of justice and the democratic process that the planning inspectors who found in our favour are also being ignored.

During the course of your company's current review of the National Hazardous Waste Management Plan, which you wrote on behalf of the Government, RPS representatives met community groups including us. In contrast to the picture you painted in Australia and Copenhagen, all the community representatives have made it crystal clear to your company that they have major problems with incineration. **In case you have forgotten**, the following are just some of the main reasons.

Global Warming - Finite Resources

In the context of the potentially tragic consequences for future generations if global warming is not tackled urgently, we are worried about avoidable carbon emissions associated with wasteful production and waste incineration.

Waste means waste of energy and natural resources. It is a concept alien to nature where everything is designed to be beneficially and easily recycled. Incinerators create a strong, long-term market for products that cannot be recycled. We need to emulate and work with nature in order to survive on this planet. At the moment we, like the mighty Titanic, are on a collision course with nature. You are aware of the growing consensus among climate experts that the outcome could be disastrous unless we change our ways quickly.

Damage to Farming and Health

Incineration of municipal and toxic waste does not “get rid” of it, but vastly increases its surface area by crudely converting it to ash (needing hazardous landfill facilities) and emissions, including large amounts of greenhouse gases and fine particulate matter. These ultra fine particles are carried long distances in the wind, are deeply inhaled and, even with state of the art filters, widely polluting. We are concerned about the dioxin hazard and the dangers to health and farming of the numerous types of other toxic particulates including those of lead, mercury, cadmium and arsenic routinely emitted by incinerators. Many of these by-products are ignored in the emission levels set by the various bodies.

Many are bio accumulative. They get into pasture, crops and food and would damage our reputation for clean produce. They are at their highest concentrations in breast milk. Recent international studies**** have confirmed the adverse health effects of incinerators and the growing conviction that no more should be approved.

Energy Recovery

The energy recovered from incineration is small in comparison with the energy used in the resource extraction, manufacturing and production processes and transportation, which result in the incineration feed.. As Professor Paul Connett said, “even if you could make incinerators safe, you could never make them sensible”. The capital and operating costs make incineration very costly for communities to use them. We do not want to be paying dearly to poison ourselves! Nor do we relish the costs involved in buying ourselves out of our failures to reduce carbon emissions.

Waste Hierarchy Inverted

As you know, prevention should be the priority of any waste plan. We made it clear that we were in favour of greater emphasis on more innovative environmentally friendly technologies, clean production and dramatic tax and other incentives to be given to products that are designed to be re-used, recycled, dismantled or composted. We have drawn attention to a number of alternative technologies for dealing with toxic waste. Sadly prevention strategies are given scant attention, whilst detailed plans for incineration, the least desirable option, are being bulldozed ahead!

Systematic Removal of Democratic Checks and Balances

We have already mentioned the overturning of Inspectors reports that conflicted with central government policy.

The democratically agreed Cork County Development Plan specifically excluded commercial incineration. Councillors subsequently voted heavily against any change in the plan that would allow the Indaver application for the Ringaskiddy incinerators to proceed. It proceeded anyway. More recently, Dublin City councillors voted a massive 33 to 3 against the Poolbeg incinerator proposal. Their views are being ignored too and the application has proceeded to An Bord Pleanala.

As you stated, this Government has changed the law regarding the statutory powers of our elected representatives “in order to get the remaining regional plans adopted”. This disenfranchisement of councillors was and remains by definition undemocratic. You claim that the majority of politicians, i.e. councillors, actually favoured their own disempowerment! This is untenable.

Cosy Appointments

We note that the Minister has recently appointed your co-director at RPS, Mr. Conall Boland, to a directorship of An Bord Pleanála! He has a clear conflict of interest and it would be improper for him to be involved in the current Dublin incinerator appeal or any similar process. Mr. Boland's cosy appointment follows the previous outrageous appointment of Laura Burke, Indaver's former Project Manager, to the board of the E.P.A.

It would appear that you have been citing Ireland as a "test case" in order to promote incineration elsewhere. Would you please confirm that your company has no present or potential commercial interest in the design or building of waste incinerators in Ireland, Australia or Denmark?

Yours sincerely,

Roma Fulton BSc and Rosie Cargin, Kinsale Environment Watch
Councillor Marcia D'Alton, B.E., M.Eng.Sc., M.I.E.I.
Frances Corr, Secretary, Concerned Residents Against Incineration, Dublin campaign
Dr. Philip Michael, Irish Doctors' Environmental Association
Carmel Cronin, B.Sc., H.Dip., M.Sc., Carrigaline Area for a Safe Environment
Mary O'Leary, Chairperson, Cork Harbour Alliance for a Safe Environment
Audrey Hogan, Ringaskiddy Residents' Association
Councillor Jo Kelleher
Natasha Harty, East Cork for a Safe Environment
Allan Navratil, B.Sc, Env. Ss., Ren. Energy, Dip Geol., participant in Cork public hearings
Kieran Cunnane, Galway for a Safe Environment
Aine Walsh, Meath /Louth No incineration Alliance
Patrick O'Brien, Louth Health Protection Group, Meath Strategic Policy Group, Environment Section,

References

* Mr. Rudden gave the Keynote Address at The Annual Conference of the Waste Management Association of Australia, held from 20 - 22 July 2005 in Sydney.

** Tuesday 3 October 2006, Copenhagen. Paul Rudden, RPS Group (IE): Policy Drivers and The Planning and Implementation of Integrated Waste Management in Ireland using a Regional Approach

The executive Summary of Mr. Rudden's Copenhagen speech can be found at:

www.iswa2006.dk/PDF/Parallel%20Session%20A%20Blue/2a%20-%20Tuesday%201030-1700/2a%20-%201430%20-%20P%20-%20Rudden%20IE.pdf

*** M.C. O'Sullivan (MCOS), later incorporated into RPS, drew up five of the country's regional waste management plans. RPS was appointed 5 years later to review the same five regional plans including the Dublin Plan.

**** Report of the French Institute for Sanitary Observation (INVS). Published 30 Nov. 06. Latest definitive and comprehensive study demonstrates a strong causal link between incinerator emissions and cancer

www.invs.sante.fr/display/?doc=presse/2006/le_point_sur/dossier_presse_dioxines_301106/index.html

The following health reports and other links and general information on incineration may be accessed on the CHASE community website at www.chaseireland.org <www.chaseireland.org/>

British Society for Ecological Medicine Report (2005) The Health Effects of Waste Incinerators www.ecomed.org.uk/pub_waste.php <www.ecomed.org.uk/pub_waste.php> . This report recommended that no more incinerators should be built.

WHO, EUROPE, fact sheet euro (04/2005) Berlin, Copenhagen, Rome, Particulate matter air pollution: how it harms health www.euro.who.int/document/mediacentre/fs0405e.pdf <www.euro.who.int/document/mediacentre/fs0405e.pdf>

IDEA Position Paper on Incineration <www.ideaireland.org/incineration.htm>