

Indaver Ireland Application for Two Incinerators in Cork Harbour

INDAVER, the Toxic Waste Incineration company, have made a new planning application to build TWO incinerators at Ringaskiddy, just across the road from the International Maritime College. Their original planning permission for one incinerator is due to expire on the 15th January 2009.

Indaver are applying to build a Hazardous Waste Incinerator to burn hazardous waste from wherever they can get it, either in Ireland or abroad. They also want to build a Municipal Waste Incinerator to burn domestic waste, despite the fact that this is contrary to Cork County Council's Waste Management Plan.

The application is being made under the new section of An Bord Pleanála dealing with Strategic Infrastructure. This means that the planning process is much faster and a decision is usually given within six months. Indaver's planning application was lodged on the 28th November and objections must be sent to the Bord within eight weeks – that is, by 5.30pm on February 2, 2009. This is a cynical exercise by the Bord to exclude worried citizens from the planning process that affects their community.

CHASE are encouraging groups of people to come together when making their objections, or to make their objections as a group e.g. residents associations, sports clubs, social clubs, etc.

Information on Indaver's Application

Information and the full Environmental Impact Statement (EIS) can be viewed and purchased at the following locations:

- An Bord Pleanála, 64 Marlborough Street, Dublin 1
- The Planning Department, Cork County Council, County Hall, Cork.

Information is also available on An Bord Pleanála's web site at www.pleanala.ie/casenum/PA0010.htm.

The EIS may also be viewed or down-loaded free of charge from the web site specifically created by Indaver for the planning documents: www.ringaskiddywastetoenergy.ie

It can also be requested by contacting Indaver:

- via email info@indaver.ie
- Free Phone 1800 200 646
- Free Post, Licence No DN 5204, Indaver Ireland, 4 Haddington Terrace, Dun Laoghaire, Co. Dublin.

Important

When requesting a copy of the Environmental Impact Statement (EIS), also ask for a copy of the HAZID Report for the development. This report deals with the potential for explosions at the site due to the dangerous hazardous chemicals that will be stored there.

Responses to the Application

Submissions

An Bord Pleanála will accept written submissions in response to the application provided they are received at the offices of the Board before 5.30pm on February 2, 2009. It is imperative that submissions are received in good time as there is no scope for accepting late submissions. There is a reasonably user-friendly guide to public participation on the Board's website at www.pleanala.ie/sid/sidpp.htm. This is particularly relevant from Q12 onwards.

A submission must be accompanied by a fee of €50.

It is important to state the name and address of the person making the submission, and to include particulars of the application, including its reference number, description, and similar information. These particulars are available at www.pleanala.ie/casenum/PA0010.htm and are summarized below:

Planning Authority: Cork County Council

Description: Waste to Energy Facility and Transfer Station at Ringaskiddy, County Cork

Case reference: PL04 .PA0010

It is very important to include your name, address, and the case reference number on your submission. If groups of people are making a joint submission, they should include the name, address and signature of each person in the submission.

Send your submission, in writing, to the following address:

An Bord Pleanála, 64 Marlborough Street, Dublin 1

The Board is obliged to have regard to submissions received. The submissions should be as complete as possible as there is strictly speaking no scope for submitting additional material and in particular there is no entitlement to submit any additional arguments once your submission is in, unless you are invited to do so by the Board.

The Board at its discretion may seek further information from Indaver Ireland in light of the submissions made. If it does this, at its discretion it may notify people who have made timely and valid submissions of any reply from Indaver, and those people may be given an opportunity to comment on the reply.

Oral Hearing

All Applicants should ask for an Oral Hearing. The Board is likely to hold an Oral Hearing and that is likely to be scheduled as quickly as possible after the closing date for submissions has passed e.g. March or April 2009.

Decision

The Inspector makes a report to the Board, which will contain a recommendation, but the Inspector is not the deciding body. The decision on the application will be made by An Bord Pleanála. The Board members who have been involved in the pre-application consultation process with Indaver Ireland Limited will exclude themselves from this decision making process. The Board is free to make a

decision in agreement with its Inspector's recommendation or entirely at odds with that recommendation.

The Board has declared that it intends to make its decision on this application by June 8, 2009.

Summary of Points to Use in Your Submission

- Incineration causes health problems. It increases incidents of respiratory illnesses especially in infants and young children. It can cause cancer, birth and heart defects and learning difficulties in children.
- Traffic volumes on our roads will hugely increase. We know already how bad the traffic at the Tunnel is at rush hour without any additional lorries taking toxic waste to Ringaskiddy – 150-200 extra lorries per day.
- The existing road network off the Great Island is not capable of supporting a safe exit from the Island in the event of a major incident at Ringaskiddy e.g. an explosion on the site that requires that the Great Island is evacuated. The main exit is by way of a hump back bridge.
- The site itself is unsuitable. The risk of erosion and flooding make it fundamentally unsuitable for the proposed development. Its proximity to high density housing makes it dangerous.
- The incinerator is a threat to public safety. It is directly across the road from the National Maritime College and poses a serious risk to the safety of the staff and students in the event of an explosion.

The tank farm, where all the hazardous chemicals (highly flammable) will be stored, is only 70m from the road (Indaver HAZID report) and not much further from the Maritime College carpark and busstop. Little chance for people here to escape the impact of an explosion or a fire ball at the tank farm. Remember the recent tank farm explosion in Bunsfield, London!

Also, if there was a serious fire at the incinerator site, the Maritime College, Naval Base, etc. are in the direct line of toxic fumes and smoke that will billow from the site.

- The fall out zone for incinerator emissions extends to a radius of 30-40 miles. Emissions from incinerators include dioxins, PCBs, heavy metals (lead, arsenic, cadmium, etc). All these are persistent, bio accumulative and toxic.

It is important that you submit your objection to this proposal. The Government has now published the report on the contamination of the Haulbowline site. Indaver's incinerators will add to the burden of contamination in the Harbour and this should not be tolerated by the community. Damage to human health or the environment cannot simply be reversed and this is your chance to make a difference.

Previous Incinerator Application

Indaver applied to build a Hazardous Waste Incinerator in 2001 and the community fought this application through An Bord Pleanála and the Courts. Indaver was refused planning by Cork County Council and by the Chief Planning Inspector of An Bord Pleanála (on fourteen Planning Grounds – see <http://www.chaseireland.org/Documents/CONCLUSION%20AND%20RECOMMENDATION.pdf>). An Bord Pleanála granted permission because they said it was in line with Government Policy, which was developer driven as we now know.

Environment Minister John Gormley has since stated that incineration is no longer a key part of government policy, and that An Bord Pleanála should not overrule the recommendations of its own inspectors on that basis, as happened with the previous Indaver application.

Detailed points to Use in Your Objection

There are many reasons why this application is wrong and unacceptable.

Wrong Site

- This site under the County Development Plan is strictly for port related industries. An incinerator is not a port related industry.
- Commercial Incinerators are excluded from being built on this site under the County Development Plan and Cork Area Strategic Plan. These plans should not be ignored as they represent democracy at a local level.
- The World Health Organisation (WHO) has guidelines for choosing sites for hazardous waste incinerators. These are designed to ensure that the correct site is chosen that poses least risk to public safety. There are fourteen criteria that such sites must pass to be deemed suitable and this site failed thirteen of the fourteen criteria.
- Indaver did not know about the WHO criteria until after they bought the site (ABP Oral Hearing 2003). This was the only site Indaver could buy in County Cork and they have since tried to shoe-horn in the site to fit the criteria.
- Only 10% of what is to be burnt in the Hazardous Incinerator comes from the Cork area and this does not justify its location in Ringaskiddy

Road Infrastructure

- Single road access to the site, at the end of a peninsula renders it totally unsuitable both in the construction and operating phases. The road to Ringaskiddy, Shanbally Roundabout, Carrs' Hill and the Tunnel are all full to capacity already. Indavers' plans would result in at least 200 extra trucks on the road /day.
- Five years ago the Chief Planning Inspector said the road was at capacity and suffered from serious traffic congestion. Traffic volumes on the road has increased 5 fold since then.
- An Bord Pleanála recently turned down an application by the Port of Cork for a container terminal at Ringaskiddy, stating in their decision that the development would “result in much of the port related traffic traversing the city road network would adversely impact on the carrying capacity of the strategic road network and around Cork city and in particular the carrying capacity of the strategic interchanges at Bloomfield, Dunkettle and Kinsale Road and the Jack Tunnel which it is necessary to preserve; the proposed development exacerbate serious traffic congestion at these strategic interchanges”.

Risk to Public Safety

There is huge risk of explosion at the Tank Farm, which is located just opposite the gates of the Maritime College. The HAZID report for the development (Indaver, 2008) shows that

“the main risk of impact off site is posed by flammable and toxic liquid waste and not from the operation of the incinerators”

The fact that Indaver has not made this report easily available on their website shows that they do not want the public to know about the dangers their application poses to the safety of everyone working and studying at the Maritime College, the Naval Base, CMRC/UCC, the crematorium, and to the people of Cork Harbour in general.

But Indaver say don't worry as they will ring the college and tell people to stay indoors and the Health and Safety people when asked what would happen students in the car park or at the bus stop said they could hide behind something !

Inadequate Emergency Infrastructure

The Emergency services told us at the previous Oral Hearing that they would not be able to get to the site in the event of a major fire due to lack of road infrastructure and its location at the end of a peninsula. This puts the lives and safety of the people using the Maritime College, the Naval Base and UCC at unacceptable risk.

Bad Neighbours

- Indaver cannot guarantee there will not be explosions and is willing to endanger the lives of the students and staff at the Maritime college for the sake of profit.
- Indaver have exceeded their emission levels in their Belgium plant and we have no faith in their monitoring.
- Indaver were asked by the community to withdraw their previous application and apply under the new planning act. This would have allowed us discuss Health and the Environment which were our major concerns in relation to the application. They would not do so. We have no trust in them as a result.
- In this application they claim they have met with the communities of the Lower harbour, which is not true. Cobh would be located approximately 600m meters across the water from the proposed incinerator. The people of Cobh are in the direct line from the chimney stacks and will be the people suffering from the effects of the pollutants that come out of that chimney. Indaver did not meet any of the communities in Cobh.

Not Trustworthy

Indaver are not credible. In their last application they said publicly they would not import waste and they then applied to Cork County Council for an import licence.

They also said publicly they would not interfere with the Democratic process and would not apply for a municipal waste incinerator until it was part of Cork County's Waste Management Plan. Incineration is still not part of this plan. Instead Cork County Council has developed Bottlehill Landfill, at a cost of 28 million Euros of taxpayers' money, to take our municipal waste for the next 30 years. Indaver, by trying to compete for the same waste, will reduce the economic viability and success of Bottlehill.

Health and Environment

The community has to have huge concerns about the effects of such a development on our health and environment. We have seen the debacle of the Haulbowline Toxic Dump which now sits leaching toxic waste into Cork Harbour.

The EPA has known about this pollution for the last 14 years and has done nothing to stop it. We know from all the reports, including the most recent one released in December, that there are huge levels of heavy metals seeping into the harbour.

We also know from the reports that concern has been expressed about the dangers of the toxic dust blowing about the island in times of disturbance or dry windy weather.

Yet the EPA has done nothing to protect us or our environment. Are we now expected to trust this EPA to protect us from the emissions from the incinerators?

We have grave concerns about what has been allowed to go on in the harbour over the years. We have called time and again for a Health Study and still have not had one. This is despite the fact that this year the Cancer Register stated that Cobh has cancer rates 40% higher than the national average.

We know that the emissions from incinerators are cancer causing and we should not be exposed to further harmful chemicals. We have no faith in the competent authorities to protect us, going on their track record.

The communities of the lower harbour have asked for and been promised a health study to determine the health of the residents there. Until this study is undertaken and complete no potentially polluting industries should be granted planning in the area.

The [4th report of the British Society for Ecological Medicine](#) (Dec. 2005) concludes that no new waste incinerators should be built. "Incinerators are in reality particulate generators and their use cannot be justified now that it is clear how toxic and carcinogenic fine particulates are".

Co2 Emissions

Incineration will add hugely to our CO2 emissions. Ireland is currently far in excess of its CO2 Emissions under the KYOTO Agreement and is being fined E 250,000,000 per annum for being in breach of its target. As well as contributing to the CO2 footprint, mass incineration represents a waste of resources and a waste of energy. Every 100,000 tonnes of waste burnt in an incinerator will emit approx 100,000 tonnes of extra carbon into the atmosphere, adding to global warming and further damaging our environment

Dioxins

We have all seen the cost of the recent dioxins in pork to the country. It has done untold damage to the food industry and Ireland's green image throughout the World. The cost of the contamination to this country is enormous and runs into 100s of millions of Euro and we will be suffering the consequences of it for a long time.

This was as a result of minute traces of dioxin getting into the food chain. The Irish Food safety Authority said there are no safe levels of dioxin in food.

Why would we want an industry that we know will emit dioxins into our atmosphere when we know what the perception of dioxin contamination can do to our economy?

Damage our Property

- The development will damage the visual amenity of the Harbour due to its sheer size. It will devalue our houses.
- It will create noise and disturbance.
- It will create dust.
- It will increase light pollution.
- It will increase dangerous emissions in the harbour.

Stress on the Community

Indavers have acknowledged the size of the plant by trying to hide its sheer bulk by clever painting schemes etc. However, its very presence in the harbour would cause terrible stress to the residents of the lower harbour as it would be a daily reminder that it is emitting harmful chemicals into a community that has already unacceptable levels of cancer.

Living with this stress would invariably damage the psychological well-being of the residents of the lower harbour.

Against National Policy

Indavers' plans are contrary to the County Development Plan, The Cork Waste Management Plan, Cork Area Strategic Plan, The Regional Development Plan, The National Spatial Strategy, The Irish Governments Waste Management Plan, World Health Organisation Site Selection Criteria for Hazardous Waste Incinerators, The Basle Convention, amongst others.

Dirty Industry

The proposal is to deal with waste of all types and will be a dirty industry in Cork Harbour which we don't want. We don't want Cork Harbour turned into another dump, which will make huge profit for a private foreign company who will one day leave and let behind yet another mess for the tax payer to clean up.

It is not a big employer (50 unskilled jobs) and will take from the success of Irelands growing recycling industry. There are many more jobs in waste separation, composting and recycling than in incineration. It is estimated that there is a potential to create 5000 jobs nationally in these areas.

Wrong Technology

In a recent National Waste review done by Dr. Dominic Hogg of Eunomia ([Waste Policy, Planning and Regulation in Ireland, April 2007](#)) it said in summary that we need to make room for other technologies that are better and cheaper and more in keeping with the volume of waste that is produced in Ireland (*CHASE has been trying to promote this approach since its foundation. The most recent report carried out by the Department of the Environment on waste also agrees with looking at alternative, more suitable technologies.*).

The report further states that Ireland needs to develop an alternative to the incinerator proposals or it will face fines running into millions of Euro for failing to meet EU waste targets.

"the economies of scale meant that large volumes of waste were needed before incineration become economically viable. The requirement for large volumes of waste runs the risk of crowding out recycling in Ireland's battle to meet EU targets."

He also stated on RTE 19th April '07, that waste would have to be imported to make commercial incinerators viable.

In relation to environmental costs, the report states that:

"The supposed superiority of incineration as a treatment for residual waste is increasingly called into question. Analysis undertaken for this report indicates that environmental costs for incinerators are not necessarily lower than those for landfills." The estimate is based upon damage costs associated with air emissions as estimated by the Clean Air for Europe Programme

And in relation to energy production, the report states:

“It is not clear that where incinerators are designed to generate electricity only, their impact on climate change is positive. Incinerators generating only electricity are net contributors to greenhouse gas emissions and not, as commonly stated, helping to reduce such emissions.”

Previous Oral Hearing Conclusions and Recommendation

14 reasons for turning down application, given by the Chief Planning Inspector after the previous Oral Hearing. These reasons still apply!

1. By reason of:-

- a) Lack of sufficient data necessary to identify and assess the main effects of the proposed development,
- b) Inadequate consideration of the interactions between the factors, and
- c) Inclusion of technical terminology within the non-technical summary,

it is considered that the Environmental Impact Statement submitted with the application is inadequate and fails to comply with the mandatory requirements as to content, contrary to the provisions of the 1999 European Communities (Environmental Impact Assessment) (Amendment) Regulations, and applicable European Directives, and the Board is not satisfied, on the basis of the information provided in the submitted E.I.S., that the proposed development would not be likely to have significant adverse impacts on the environment.

2. It is considered that the proposed development of a hazardous waste incinerator facility, prior to any progress on the achievement of the waste prevention targets set out as a priority and first step in the National Hazardous Waste Management Plan, would be premature and, because of its scale, which is considerably in excess of the scale envisaged for thermal treatment in that Plan, would tend to inhibit the achievement of the Prevention Programme as provided for in the Plan. The proposed development would therefore be contrary to national policy in relation to hazardous waste management and disposal.

3. It is considered that the development of a hazardous waste incinerator facility, in the absence of the concurrent or prior provision of hazardous landfill capacity, would be premature, and would conflict, in a material way, with the provisions of the National Hazardous Waste Management Plan, in that no provision would be made for hazardous waste generated by the proposed development.

4. It is considered that the development of an incinerator facility for the treatment of non-hazardous industrial waste is contrary to the provisions of the Cork Waste Management Plan 1999, which makes no provision for thermal treatment to deal with this type of waste.

5. Having regard to its nature and location, it is considered that the proposed development would contravene materially the development objective ZON 3 – 13, indicated in the Cork County Development Plan 2003, for the use of the site primarily for the development of industry/enterprise, but not including the development of “contract incineration”, in that the proposed development constitutes contract incineration.

6. Having regard to its nature and limited employment content, it is considered that the proposed development would contravene, in a material way, the development objective I –15, indicated in the County Development Plan 2003, which specifies the lands, of which the site forms part, as suitable for large stand alone industry.

7. Having regard to its nature and purpose, and its location adjacent to Cork harbour and to port-related activities in Ringaskiddy, it is considered that the proposed development would contravene, in a material way, the development objective I-22, indicated in the County Development Plan 2003, which states that it is an objective to safeguard lands in the vicinity of ports and harbours against inappropriate uses that could compromise the long term potential of the port and harbour. It is considered that the proposed development is not port-related and hence is an inappropriate use that would be inconsistent with the Council's policy of promoting Ringaskiddy as the appropriate location for the future development and expansion of the Port of Cork, and uses that are complementary to that purpose.

8. It is considered that the proposed development, by reason of its bulk, scale, height, design and location, would be visually obtrusive and seriously injurious to the visual amenities of the area, would constitute a visually discordant feature within the harbour landscape, and would detrimentally impact on the preservation of views and prospects obtainable from scenic routes nos. A53 and A54 indicated in the County Development Plan 2003, which it is necessary to preserve. The proposed development would, therefore, be contrary to the proper planning and development of the area.

9. Having regard to the scale, nature and purpose of the proposed development, it is considered that the site, by reason of its topography, its climatic conditions, its geological and hydrogeological characteristics, and the risk of erosion and flooding of parts of the site, would be fundamentally unsuitable to accommodate the proposed development, and the applicants have not demonstrated that the proposed site is suitable, on the basis of objective criteria in a rational site selection process based on international best practice.

10. The proposed development, because of its nature and function, its location in close proximity to high density housing development at Ringaskiddy, and the resultant noise and disturbance arising from its construction and operation, would be seriously injurious to residential amenity, and would be likely to depreciate the value of residential property. The proposed development would, therefore, be contrary to the proper planning and development of the area.

11. Having regard to the location of the proposed development at the end of the peninsula of Ringaskiddy, with a single road access and no rail access, on the southern coast of the State, and to the scale of the development which is designed to source waste from all parts of the State, it is considered that the proposed development would involve excessive movement of vehicular traffic through urban areas, and hence would give rise to conditions that would be prejudicial to public safety and amenity. The proposed development would therefore be contrary to the proper planning and development of the area.

12. The existing road infrastructure in the vicinity of the site, particularly along the N28 national primary route at Carr's Hill, the Shannonpark and Shanbally roundabouts, and along the LP2545 local road within Ringaskiddy, is currently the subject of serious traffic congestion, and is inadequate to accommodate the extra volume of traffic and traffic movements that would be generated by the proposed development, both during construction and operational phases, particularly the significant H.G.V. content. It is considered that the proposed development would endanger public safety by reason of a serious traffic hazard and obstruction of road users.

13. The proposed development would be premature by reference to the existing deficiencies in the road network serving the area of the proposed development, which it is not likely will be rectified within a reasonable period.

14. The Board is not satisfied, on the basis of the evidence submitted to it and heard at the oral hearing, that the proposed development would not pose significant risks to public safety in the event of major accident hazard, particularly in view of the proximity of the site to the National Maritime College, and to nearby Seveso II establishments, and having regard to the inadequacy of emergency

infrastructure in the area and to the location of the site at the end of the peninsula, with limited road access.

In Short

10 reasons you don't want Indaver's incinerators in Cork Harbour

- 1. Bad neighbours. - too close to Navy, Maritime College, and residents.**
- 2. Bad site. - Prone to flooding, coastal erosion.**
- 3. Bad for your health. - Cancer, Asthma, respiratory problems.**
- 4. Bad for the environment - Toxic emissions.**
- 5. Bad for your pocket. - devalues your house, increases your refuse charges.**
- 6. Bad for traffic - 200 extra trucks on the roads - most carrying toxins. Chaos at Jack Lynch Tunnel.**
- 7. Bad for jobs - incineration equals 50 jobs, alternatives equals 500 jobs.**
- 8. Bad for climate change - increases global warming and wastes precious resources.**
- 9. Bad for the food chain - emissions will adversely effect agriculture.**
- 10. Bad for railway transport. - NONE**

BAD FOR CORK - BAD FOR YOU

Further Information

The CHASE web site (www.chaseireland.org) contains a wide range of information you can use in your submission to An Bord Pleanála. Of particular use are the following:

Summary of Health Effects of Incineration

<http://www.chaseireland.org/HealthEffectsDocuments.htm>

CHASE Information Leaflet 2006

<http://www.chaseireland.org/HealthEffectsDocuments.htm>

Two Incinerators for Cork Harbour - Toxic & Household (Facts – Issues – Concerns)

<http://www.chaseireland.org/Documents/CHASEConcernsOverview.pdf>