

EPA Oral Earing Kinsale Environment Watch Closing Submission

Kinsale Environment Watch has made no secret of the fact that it finds these proceedings seriously flawed. We feel that it is impossible to solve the issues around incineration and this proposal in particular, if those involved in the drafting of the licences are not prepared to discuss or explain the reasoning behind their decision. Similarly an employee of the EPA can not sit in judgement on the agency's decision. To remove the issue of conflict of interest, we call for the resignation of Laura Burke from the board of the EPA and for the appointment to that board of representatives of environmental NGOs in this country. There are many groups representing the interests of business in Ireland. An environmental protection agency should be weighted in favour of the environment . It should actively protect that environment not work out where it can squeeze in another bit of pollution to accommodate industry. Who or what are the EPA protecting?

We have already made the point that there is a clearly apparent conflict of interest in your position, Mr. Chairman, in that we are to accept, that you, who signed into existence this draft licence, are now capable of deciding to recommend against it to your own board. A board who's director general has made it abundantly clear that she supports incineration. Nonetheless it also seems to us that it would be virtually impossible for an intelligent man to adjudicate in favour of the applicant after what we have heard during the course of the past 12 days.

We feel that arguments around the health effects of incineration depend on whether or not you take the view that there are acceptable levels of emissions and that accidents don't occur. Well accidents do occur and we know that incinerators regularly exceed their emission levels. More importantly these levels are not safe levels...no one will claim that....but measurable ones. What is significant from the dioxin studies presented by Gavin ten Tusscher is that the serious health effects on the children studied occurred at permitted background emission levels. Regulations put in place for emissions are based on what is technically achievable rather than on health and environmental data.

Indaver's consideration of the risk to human health is made all the more unacceptable by Dr. ten Tusscher's studies. Their MARI or most at risk individual is a subsistence farmer when they should have been looking at the effects on those most vulnerable in our communities; the subsistence farmer's developing baby or new-born; his or her elderly parent; the pregnant member of the family; someone with long term health problems etc. If we protect the most vulnerable in our society, the rest will be taken care of. When considering the emission limits we need to remember that we measure only what we know of. Most of what comes out an incinerator stack is unidentified and therefore not measured, and we have no way of knowing the cumulative effects of these chemicals.

It would be wiser while trying to move towards a waste policy aimed at reducing health effects, to place the emphasis on prevention, reuse, cleaner production and toxic use reduction.

We in Ireland have not implemented waste prevention and minimisation policies and neither have other EU countries. Our waste management strategy lacks the necessary infrastructure and resources, and government commitment. The idea of an Integrated Waste Management policy sounds great but no one is fooled by the spin and glossy presentation. Once an incinerator is built it needs to be fed for the following 20 to 30 years and will discourage new options. This is not acceptable when we haven't made a genuine attempt even to consider the alternatives let alone implement them. Because of this we call for a moratorium on the building of incinerators until the effects of a creative waste management strategy can be considered.

The issues around incineration are not concerned only with health and environmental damage but go to the very heart of what we consider to be just and acceptable in a democratic society. We could be forgiven for questioning the very existence of that democracy when we see that the granting of the draft licences is contrary to the Cork Co. Development Plan, the Cork City and County Waste Management Plans and the Cork Area Strategy plan. How can you grant a licence for an incinerator (i.e. the municipal waste incinerator) which has no planning permission, and a toxic waste incinerator, which are both contrary to the decisions already taken by elected representatives of the people of Cork?

We believe that the people of Ringaskiddy should not be burdened with any more polluting industry. In fact no community should be asked to accept a project which is obviously not necessary when you look honestly at the figures and ignore all attempts to twist and distort them. We want to accept responsibility for the waste we produce and for the safe disposal of that waste and we are committed to promoting alternatives to that end. We demand that the EPA and the Government look seriously at the wastefulness of this technology; the continual destruction of finite resources; the huge input of energy for the production of the incinerator feed compared with the small amount recovered; the huge economic costs in the building of incinerators, the tipping fees, the costs in health; and the dangers posed to the environment and human beings, including those living in the vicinity of the approved landfill sites, from the movement and disposal of highly toxic ash. We want them to recognise the world-wide opposition to incineration including that in Europe which is continually under reported.

We, on our side of the argument, have had no difficulty in setting out our stall and in demonstrating the flaws in the proposals of the applicant. We have established beyond all reasonable doubt that Mr Ahern and all his so-called top advisors have not done their homework properly. They have made no attempt to, nor spent any money on, researching the health issues as witnessed by the absence of any health impact assessment. The chosen location on a flood plain also demonstrates a blatant disregard for the most basic regulations set down by the World Health Organisation. Then we had

the extraordinary performances of Indaver's general manager Mr. Ahern and in turn his stated expert, sorry top professional with stated expertise, Mr. Conor Jones. Mr Jones admitted that there is no employee of Indaver Ireland who has any experience in the design of, or construction of, or operation of, an incinerator of any type. That news was not surprising to us. When said so calmly and in the cold public hearing of all those here, it was a truly chilling statement. This enterprise of Indaver's might be more aptly titled Titanic 2. We wonder if Mr Jones and Mr Ahern and all the other top professionals and people with all that expertise, would be happy to set sail on a ship across the atlantic ocean in the comforting knowledge that neither the captain of the ship nor any of the crew had ever set foot on a ship before. They may even be comforted by the knowledge that prior to embarkation the captain had discussed his plans with his colleagues on the Lusitania. May we take it therefore that if Indaver ever does manage to construct one of its ghastly incinerators that there will be a sign on the gate saying "operators wanted" "no previous experience required".

Mr Chairman, if as you have suggested at the outset of this hearing, you only signed the draft licence as a clerical function and not as a sign of approval, then, quite frankly, we will be amazed and bewildered if you leave this room at the conclusion of this hearing with any doubt in your mind as to the madness of allowing this group of reckless amateurs to take charge of anything more than Mr. Ahern's garden barbecue. We have heard nothing here from the opposition which gives us the slightest reassurance but rather they have, for a second time, left us in a state of horror and anger at the awful prospect of their association with, and control of, an incinerator of any type anywhere on this beautiful island of ours. We do not doubt Mr Chairman that you have integrity and we are sure that you have sufficient self respect to know that by demonstrating your approval for this immoral, negligent and reckless proposal you will severely damage both in the eyes of your fellow citizens.

To finish we quote Dr. Paul Connett, Professor of Chemistry at St. Lawrence University, New York and a world renowned expert on dioxins and incineration.

'...when you build an incinerator in your community you are advertising to the world that you were not clever enough, either politically or technically, to recover your discarded resources in a manner which is responsible to your local community or future generations.'