



*Cork Harbour Alliance for a Safe Environment
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Ms Mary Harney
Minister for Health and Children

Dear Minister Harney,

As you are aware, CHASE has been actively involved in the incineration debate over the last number of years. Having engaged in both the planning process and the waste licence application, many of the concerns of the community still remain unanswered. One of the most important issues that concern the community remains that of health and public safety.

In relation to the two proposed incinerators in Ringaskiddy, CHASE has presented all of the medical evidence at both oral hearings, and would now like to draw your attention to this evidence.

Incinerators produce the following:

~ stack gases, minute dust particles, and ash.

All these contain pollutants that are harmful to our health. *That is why they are regulated.* Emissions from incinerators include: particulate matter, dioxins, PCBs, and heavy metals (lead, arsenic, cadmium, etc.). All of these are persistent, bioaccumulative and toxic.

In 2003, the Health Research Board (HRB) published a government commissioned report which concluded that:

- Ireland has insufficient resources to carry out adequate risk assessments for proposed waste management facilities.
- 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.

In addition, Dr. Anthony Staines, one of the authors of the HRB report, reiterated these findings at the EPA Oral Hearing and concluded that:

“The proposed development requires a proper Health Impact Assessment to ensure reasonable consideration of human health issues. The material provided in Indaver’s EIS falls short of any reasonable estimate of what is required.”¹

¹ Health Research Bureau Report, “*Health and Environmental Effects of Landfill and Incineration*”, 2003.

Incinerator emissions include fine particles or particulate matter (PM). The tiniest of these (PM_{2.5}) cannot be trapped by filters in the incinerator stacks and are the most dangerous because they penetrate more deeply into the lungs. Because of their tiny size they also travel farther and persist longer in the atmosphere than larger particles (PM₁₀). According to the World Health Organisation (WHO): “PM_{2.5} seriously affects health, increasing deaths from cardiovascular and respiratory diseases and lung cancer.” And a recent report on the health effects of incinerators concluded that:

“Incinerators are in reality particulate generators, and their use cannot be justified now that it is clear how toxic and carcinogenic fine particulates are.”²

The most recent report carried out by the prestigious British Society of Ecological Medicine states the following:

- Large studies have shown higher rates of adult and childhood cancer and also birth defects around municipal waste incinerators.
- Incinerator emissions are a major source of fine particulates, of toxic metals and of more than 200 organic chemicals, including known carcinogens, mutagens, and hormone disrupters.
- Present safety measures are designed to avoid acute toxic effects in the immediate neighbourhood, but ignore the fact that many of the pollutants bioaccumulate, can enter the food chain and can cause chronic illnesses over time and over a much wider geographical area.
- Incinerators produce bottom and fly ash which represent 30-50% by volume of the original waste (if compacted). Abatement equipment in modern incinerators merely transfers the toxic load, notably that of dioxins and heavy metals, from airborne emissions to the fly ash. This fly ash is light, readily windborne and mostly of low particle size. It represents a considerable and poorly understood health hazard.
- It has been claimed that modern abatement procedures render the emissions from incinerators safe, but this is impossible to establish. Moreover, two of the most hazardous emissions – fine particulates and heavy metals – are relatively resistant to removal.
- There are now alternative methods of dealing with waste which would avoid the main health hazards of incineration and would be far cheaper in real terms, if the health costs were taken into account.
- Incinerators presently contravene basic human rights as stated by the United Nations Commission on Human Rights, in particular the Right to Life under the European Human Rights Convention, but also the Stockholm Convention and the Environmental Protection Act of 1990. The Foetus, infant and child are most at risk from incinerator emissions; their rights are therefore being ignored and violated, which is not in keeping with the concept of a just society.
- The literature reviewed leads us to the opinion that new facilities emitting substantial quantities of fine particulates, volatile heavy metals and hazardous organic pollutants should not be approved and that urgent measures should be taken to reduce the emissions from waste burning installations in current use and to apply rigorous biological monitoring until they can be taken out of service and safer methods of waste disposal brought into operation.

² Fact Sheet EURO /04/05, Berlin, Copenhagen, Rome, 14 April 2005

Finally, in *The Askeaton Investigation and the failure of Irish health information systems* report, the authors concluded that:

“The investigation highlighted the almost total failure of Irish health information systems to respond to any form of in depth analysis of population health status.” They make several recommendations in relation to how the above could be addressed but premise it by stating these recommendations are made on the presumption that adequate resources would be made available.

The above information clearly indicates:

- a. The dangers and health problems associated with mass incineration.
- b. The inability of our health system to monitor, access or evaluate the implications of major infrastructure facilities which could pose a threat to the public.

This information sets out very clearly the health problems and risks associated with mass incineration as a means of waste management. With such information available to the Government it is imperative that mass incineration is removed from the National Waste Management Strategy. Public health and safety cannot be gambled with. With an increase in public awareness of the problems associated with incineration and the fact that there are many alternatives available, there will never be public acceptance of this outdated and potentially dangerous technology.

I trust you will give careful consideration to the above and look forward to your comments.

Yours sincerely,

Mary O’Leary, Chairperson,
Cork Harbour Alliance for a Safe Environment (CHASE).