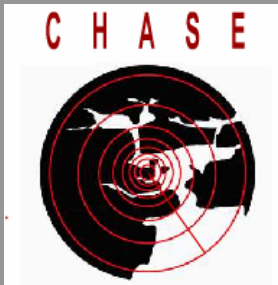


C. H. A. S. E.

Cork Harbour Alliance for a Safe Environment

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CHASE

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About CHASE

Who are CHASE?

CHASE is an umbrella organization for groups determined to protect the health of their communities and safeguard the harbour environment for future generations.

Local groups

CHASE is represented at a local level by groups in Carrigaline, Cobh, Cork, Crosshaven, Douglas, Kinsale, Middleton, Monkstown, Ringaskiddy, Youghal. These are *your* voice in the campaign for a safe environment, and most urgently, for preventing construction of a hazardous waste incinerator at Ringaskiddy.

Making your voice heard

With your support CHASE has campaigned vigorously against the proposed incinerator: raising awareness, lobbying our elected representatives, and making detailed, reasoned objections to the planning authority and Oral Hearing.

But the campaign continues, and we need your help!

This information leaflet is a reminder of the issues involved, why we should care and what we can do.

Where are we now?

Planning application

In 2001 Indaver Ireland applied for planning permission to build a 100,000 tonne hazardous waste incinerator in Ringaskiddy.

Cork County Council received 23,000 objections to the application. And, in May 2003, Cork County Council REFUSED PERMISSION for the development as it would:

"would materially contravene the County Development Plan 2003".

Planning appeal

Indaver appealed this decision to An Bord Pleanála.

Twenty-four community groups and individuals also appealed – while they supported the decision, they argued that there were many more grounds for refusal than the one cited by the Council.

A long and detailed Oral Hearing was held in September/ October 2003, presided over by a Senior Planning Inspector of An Bord Pleanála. You can view the Inspector's report at: www.pleanala.ie/REP/131/R131196.DOC.

Inspector's recommendation

The Inspector's report on the proceedings includes a clear summary and assessment of the points raised by all parties in their grounds for appeal.

The Inspector's conclusion and recommendation clearly and emphatically RECOMMEND REFUSAL of planning permission for the incinerator.

Despite the fact that he could *not* take into account the risk of pollution from the development, or its impact on human health, the Inspector provided a schedule of 14 REASONS for refusing planning permission (see page 3).

The Board's decision

On 15th January, An Bord Pleanála decided:

- NOT to accept their Inspector's recommendation.
- To overturn the earlier decision of Cork County Council.
- To grant permission for the incinerator.

ZERO WASTE – ZERO INCINERATION – ZERO REGRETS

Where do we go from here?

“industrial areas ... are considered to be generally suitable for waste management activities ... but not including landfill or contract incineration”
Cork County Development Plan 2003

It is necessary to ensure that “development of waste to energy incineration capacity does not militate against long term investment in materials recycling.”
Changing our Ways 1998 (national policy document)

“it would not be prudent to accept the conclusions ... in the EIS in relation to the likely significant impacts of the proposed development.”
Inspector’s Assessment

“the Council will endeavour to reduce the quantity of waste for final disposal ... in the first instance by making every effort to prevent and minimise waste arisings and secondly by recovering as much waste as possible.”
County Cork Waste Management Plan

Judicial Review

In light of overwhelming public anger and dismay at the Board’s decision, an application for a judicial review was lodged with the High Court on March 9th 2004.

The challenge is being brought against the State, An Bord Pleanála and the Attorney General, by 11 harbour residents and the Ringaskiddy & District Residents Association.

The applicants seek to overturn the planning permission on several grounds, including that it breaches our rights under the Constitution, under two EU Directives and under the European Convention on Human Rights.

After numerous deferrals and postponements, the application for a Judicial Review was heard on 24th January 2005. The judge found significant grounds for allowing a Judicial Review and the case now awaits a date for hearing by the High Court.

To safeguard our environment for ourselves and future generations, it is imperative that we support this action!

How can you help?

- Make a donation to the campaign.
- Set up a standing order if you would like to donate on a regular basis (contact CHASE office at (021) 4815564.
- Support our fund raising activities. And tell your friends and colleagues about them.

- Donate your time or expertise to the fund raising activities.
- Contact your local CHASE group and get involved.

EPA Waste Licence

Indaver Ireland require a Waste Licence from the Environmental Protection Agency (EPA) to operate the incinerator plant at Ringaskiddy.

- The EPA issued a draft licence in October 2004 (Licence no. 186-1).
- The license covers not only the Incinerator for which planning has been granted, but also a SECOND municipal waste incinerator for which planning permission has not even been applied.
- About 15 objections to the licence were received by the EPA.
- CHASE made a submission on the licence application to the EPA prior to the draft licence being issued. The submission outlined the principal flaws, errors and areas of concern - most of these are not taken account of in the draft licence.
- The EPA will hold an Oral Hearing of objections on Monday, 14th February 2005, at the Great Southern Hotel, Wilton Suite, Cork Airport 11.30 am.
- The Oral Hearing is open to the public - anyone can attend.

About the proposed incinerator

Phase 1

The proposed development involves a mixed hazardous and industrial non-hazardous waste management facility, with:

- A fluidised bed incinerator (capacity 60,000 tonnes)
- A post combustion chamber (capacity 40,000 tonnes).

The site

The 30 acre site is at the eastern tip of the Ringaskiddy peninsula. The building complex will run from the road to the top of the hill to the South, and will require extensive excavation of the hillside.

The main process building will be 35m (115ft) high and will extend above the top of the hill behind it, making it visible from areas such as Crosshaven and Currabinny.

The associated stack will be 55m (180ft) high.

Phase 2

A second phase to the development involves a 100,000 tonnes facility for non-hazardous commercial and household waste. This will be the subject of a separate planning application.

Employment

According to Indaver, phase 1 will employ about 50 people. In contrast, it has been estimated that a properly structured recycling industry would create approximately 5000 jobs.

Why did the Inspector recommend refusal?

“the proposed site ... is objectively unsuitable to accommodate the proposed development. It should, in my judgment, be refused on this ground.”
Inspector’s Assessment

“I would support the Planning Authority’s reason for refusal, but would considerably add to it.”
Inspector’s Assessment

“Asked whether he could definitively say that there would not be any accidents at the proposed plant, Mr. Ahern stated that of course he could not give such a guarantee.”
Oral Hearing Proceedings

“Thermal inversion occurs when a layer of warm air settles over a layer of cooler air that lies near the ground. The warm air holds down the cool air and prevents pollutants from rising and scattering.”
Thermal Inversion Definition

1 Inadequate EIS

The EIS (Environment Impact Statement) is inadequate and fails to comply with the mandatory requirements.

2-3 Contrary to National Policy

The development is contrary to the National Hazardous Waste Management Plan:

- With waste prevention as the top priority and first step in the Plan, it is premature and would tend to inhibit achievement of waste prevention targets.
- Its scale is considerably in excess of that envisaged for thermal treatment in the Plan.
- There is no concurrent or prior provision for landfill of hazardous waste generated by the incinerator, as envisaged in the Plan.

4-8 Contrary to County Policy

The Cork Waste Management Plan:

- makes no provision for thermal treatment of either hazardous or non-hazardous waste.

The Cork County Development Plan 2003:

- precludes contract incineration anywhere in the county
- specifies the proposed site as suitable only for large, stand-alone industry and advocates Ringaskiddy as a location for port-related use

- aims to preserve the views from scenic routes in Monkstown and Cobh.

9-11 Site unsuitable

- The site’s topography, climatic conditions, geology, hydrology, and the risk of erosion and flooding make it fundamentally unsuitable for the proposed development.
- Its proximity to high density housing would be seriously injurious to residential amenity.
- At the end of a peninsula, with a single access road, the excessive increase in traffic would be prejudicial to public safety and amenity.

12-13 Inadequate road infrastructure

- The development would endanger public safety by reason of serious traffic hazard and obstruction of road users.
- It would be premature given that the inadequate road infrastructure is unlikely to be rectified within a reasonable period

14 Risk to public safety

- With the proximity to the National Maritime College and other Seveso II plants, the inadequacy of emergency infrastructure, and a location at the end of a peninsula, the development could pose significant risks to public safety in the event of a major accident.

Why is the site unsuitable?

Summary of main reasons

The Inspector’s assessment cites the following reasons why the site is unsuitable:

- Proximity to areas of high-density housing in Ringaskiddy, Cobh, Monkstown etc. and to the National Maritime College, which will be less than 100 metres away.
- At risk of flooding and erosion, with a very real possibility of pollution of the ground water and harbour waters.
- Inadequate, congested, and even hazardous road infrastructure
- Lack of adequate emergency infrastructure.

WHO Guidelines

WHO (World Health Organisation) guidelines include these exclusionary criteria, all of which apply to the Ringaskiddy site:

- coastal areas subject to floods
- atmospheric conditions such as inversions which would prevent safe dispersal of accidental releases

- proximity to sensitive installations storing flammable or explosive materials.

Dispersal of accidental emissions

Even with state-of-the-art technology and regular monitoring, emission control equipment is only mechanical and can and does fail. The result will be uncontrolled discharges to the atmosphere, potentially well in excess of permitted limits.

Cork Harbour is a valley that regularly experiences thermal inversions (an exclusion factor in the WHO guidelines). Pollutants released under these conditions will be trapped in the harbour area, contaminating living organisms, air, soil, and the food chain.

Why was this not considered in the EIS? Because the model used to predict the impact of emissions was based on meteorological data from Cork Airport, which is 12 miles away, 100m higher, and rarely experiences thermal inversions!

EU and National Policy – Prevent, Minimise, Reuse, Recycle

“Thermal treatment facilities ... must only be used where it can be shown that all options for prevention, minimisation, re-use and recycling have been fully utilised.”
PD Manifesto 2002

The Waste Management Hierarchy

This principle is at the heart of EU, National, and County policy. It sets out a hierarchy of options for dealing with waste, with prevention as the highest priority and disposal (thermal treatment and landfill) as a last resort.



While National Policy does envisage disposal as part of the solution to our waste problem, it advocates the Waste Management Hierarchy and recommends disposal only for “waste which cannot be prevented or recovered.”

National Plan

The “cornerstone” of our National Hazardous Waste Management Plan is WASTE PREVENTION. This is its primary objective. Its secondary objective is to manage any hazardous waste “which cannot be prevented”.

It also urges that thermal treatment facilities “must not be allowed to interfere with the potential to prevent or minimise the generation of hazardous waste”.

National targets

The target in the National Plan is to reduce the quantity of hazardous waste for disposal to 1996 levels (less than ½ that currently generated).

Conclusions

It is clear that our national policies and plans prioritize prevention and minimisation and propose a significant reduction in the amount of hazardous waste that ends up incinerated or landfilled.

In the absence of any real progress at the higher levels of the waste hierarchy, and in light of the above targets, the proposed facility:

- Is (at best) premature.
- Would act as a disincentive to achieving the more urgent targets for prevention, minimisation, reuse, and recycling.
- Has capacity well in excess of that envisaged in the National Plan (66%-79% overcapacity).

“I would like to set the record straight: the Commission does not promote incineration. We do not consider that this technique is favourable to the environment Those countries that are in the process of drafting their planning should not have it based upon incineration. A quality incinerator is a costly investment that has to be fed over 25 to 30 years”.

Ludwig Kramer, EU Director of Waste Management, 1999

What about the proximity principle?

What is the proximity principle?

National policy endorses the proximity principle – that is, waste should be treated as close as possible to where it is generated.

Why Ringaskiddy?

The oft-stated reason for selecting Ringaskiddy is that Co. Cork generates 60% (115,000 tonnes) of Ireland’s hazardous waste.

While this is true, the amount generated is NOT the same as the amount available for disposal. The proposed incinerator is intended only for:

“hazardous waste that is currently exported for incineration”

Facts and figures

- ⅓ of the hazardous waste generated in Co. Cork is dealt with by inhouse incinerators. The other ⅔ is exported.
- Of the waste exported, approx. 83% is sent for recovery and about 17% for disposal.
- So only about 6,500 tonnes of the hazardous waste generated in the county will be available to the proposed incinerator.
- Nationally, about 48,000 tonnes of hazardous waste is exported for disposal per annum.

In this context, the proximity principle would surely exclude a site on a cul-de-sac, at the end of a peninsula, at the extreme southern end of the country.

“Dioxin is like throwing a hand grenade into our biological mechanisms.”
Dr. Paul Connett, Professor of Chemistry, St. Lawrence U. NY State

Environmental and health issues

"Emissions from the incineration process are extremely dangerous. We must use every reasonable instrument to eliminate them altogether."

Michael Meacher, UK Environment Minister

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

L. Hens, Human Ecology Dept, Free University Brussels

"It is generally accepted that emission standards are based on what can be measured and what is achievable, rather than on what is safe."

Dept. of Environment (UK) Committee

"There clearly is a problem associated with animals reared close to ... waste disposal incinerators"

EU Commissioner for Food Safety, David Byrne, 1999

Incinerators create hazardous waste

Incineration does *not* destroy waste – it merely converts it to other forms, such as:

- stack gases
- minute dust particles
- ash (much requiring hazardous landfill).

All these contain pollutants that are harmful to our health. That is why they are regulated.

Atmospheric emissions

Emissions from incinerators include:

- dioxins
- PCBs
- heavy metals (lead, arsenic, cadmium, etc.).

All of these are persistent (degrade very slowly), bioaccumulative (build up in living organisms over time), and toxic.

Particulate matter

Much of the dust (including heavy metals) emitted from incinerators is ultrafine. This means that it is easily inhaled and can reach the deepest part of our lungs. This is where it can do the most damage.

Health risks

Dioxins and PCBs are toxic chemicals that can have severe health effects, especially on the developing foetus and young children. Known health effects include:

- cancer
- impairment of the immune, hormonal, and reproductive systems
- congenital abnormalities
- delayed cognitive and motor development in children
- disruption of critical stages of embryonic development.

Dioxin in the food chain

The fallout zone for incinerator emissions extends to a radius of 30-40 miles. But by far the greatest risk of exposure to dioxin is through the food we eat.

Dioxin from incinerator emissions settles on vegetation, in soil, and in the oceans, and so enters the food chain.

Animals ingest the contaminated pasture and soil, fish ingest the contaminated water, and the dioxin concentrates and accumulates in their fatty tissues. Then *we*, in turn, eat the contaminated meat, dairy products, and seafood, and the dioxin concentrates and accumulates in *our* fatty tissues.

Further up the food chain, mothers pass dioxin to babies in their womb and when breast feeding.

Economic risks

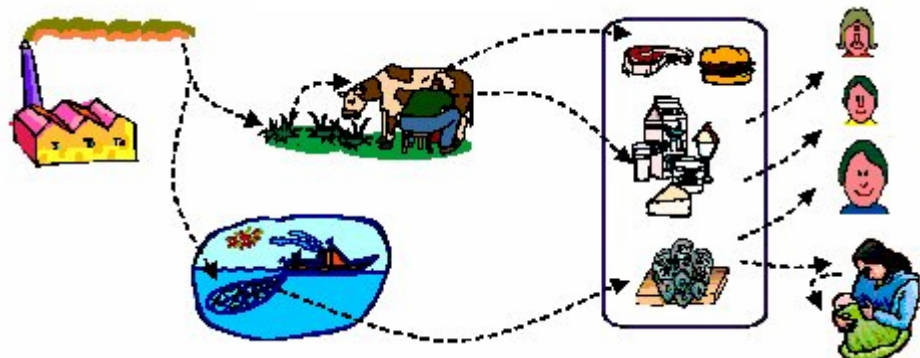
The foods which tend to have the highest dioxin concentrations are dairy products, meat and poultry, eggs, fish, and animal fats.

Currently Ireland has the lowest dioxin levels in Europe, but what will happen to export prices when Irish food is contaminated by dioxins and other poisons from incineration?

The Belgium 'dioxin crisis' of 1999 provides a salutary lesson.

The Belgian food industry was badly damaged when high levels of dioxin were discovered in eggs and chickens and traced back to dioxin-contaminated animal feed. Import bans by countries worldwide included chicken, eggs, meat, and any products containing eggs or milk. The Belgian government estimated the cost of the crisis at €465 million.

The Food Chain



What are the alternatives?

Alternative waste treatments

National policy includes thermal treatment of hazardous waste. But why clutch at the first proposal that comes our way – particularly a mass burn facility that uses technology in commercial use since the early '70s?

Thermal treatment has advanced in leaps and bounds since the '70s and there are alternatives to the type of facility proposed by Indaver.

For example, while Gasification and Pyrolysis share some of the problems of mass burn facilities (harmful emissions and hazardous ash), they are more efficient, produce less ash, allow better emission control, and some are available in trailers that can be transported to the point of waste production.

So, if we must have thermal treatment, why not small mobile units that treat pre-sorted waste, using contained, controlled systems specific to each waste type? After all, our goal is to reduce thermal treatment of hazardous waste to about half today's levels.

And what about safer, alternative technologies, such as:

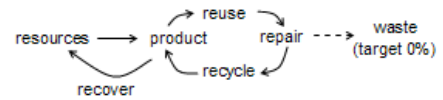
- composting
- anaerobic digestion
- biodegradation
- gas phase chemical reduction

NONE OF THESE PRODUCE DIOXIN.

Zero Waste

Zero Waste is a PHILOSOPHY, a JOURNEY, and a GOAL that is being embraced by businesses and governments worldwide – in particular, Canada, New Zealand, Australia, and some US states.

Zero Waste aims to change the one-way flow of materials through society to a circular system that ensures that products are made to be reused, repaired, or recycled:

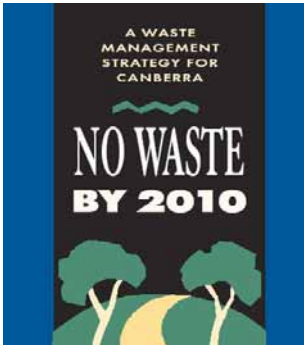


The journey towards zero waste involves:

- eliminating waste at source through product redesign
- reducing waste further down the supply chain through cleaner production, reuse, repair, recycling, and composting.

In principle, our own national policy corresponds with the concept of Zero Waste, with its focus on prevention and minimization.

But what choice does Ireland make from the vast range of global waste management models and technologies? Age-old mass burn incineration – a solution that will render virtually redundant the “cornerstone” of national policy, which is PREVENTION.



Canberra Government, Australia

“a vision for a society that values its environment and resources, and a guide to achieving it.”

New Zealand Waste Strategy – Towards zero waste and a sustainable New Zealand


“The goal is zero – zero waste and emissions.”
Vice President, DuPont

“It is important to set ourselves demanding targets. While at first sight the goal of zero emissions... may seem beyond our reach, I believe it has importance in focusing our quest for solutions to a complex problem.”
Deputy Group Chief Executive, BP International

Local group contacts

- Carrigaline: Joan Masson (437 8255)
- Cobh: Mary Hurley (481 3070)
- Cork City: Kathleen Ryan-Tucker (454 2393)
- Crosshaven: Christine Brownlow (482 1726)

- Douglas: Dominick Donnelly (489 9003)
- Kinsale: Gillian Perrott (477 7991)
- Midleton: Natasha Harty (465 2429)
- Monkstown: Mamie Bowen (484 1036)
- Ringaskiddy: Audrey Hogan (239 4009)



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Incinerator Alternatives – Zero Waste – Photo Gallery

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