Submission by Colm Mac Dowell to the oral Hearing on the Indaver Incinerator 19 –April 2016,

I am Colm Mac Dowell, and I have worked in the waste recovery and resource recovery, business in Ireland for about thirty years, I am a Dangerous Goods Safety Advisor and I have a Master`s Degree in Environmental Protection, A Member of the Chartered Institute of Waste Management, and a Nominated Member of the CEN Committee for the development of Standards for Solid Recovered Fuels, SRF, based in Brussels.

I object to the Indaver proposal on the basis of the following:

The concept of building a machine to destroy a resource (waste) and not utilize all or as much of the energy produced is not sustainable or in keeping with the direction of the drive towards a circular economy.

The proposed development shall burn resources (waste) and operate at a proposed efficiency of 25- 30%, and therefore must waste 70 – 75% of the heat energy produced. The EIS submitted in 2.3 under Energy and Climate Change heading that 18 .5 MW of Electrical Energy, In my experience, similar facilities on mainland Europe operate at above 60% efficiency and some as high as 85% using all of the heat produced from the combustion process into process heat and into district heating to large end users of heat, industry, hospitals, schools and municipal and commercial buildings. This is a much more sustainable use of the resource recovery,

In my experience, currently the modern thinking is for front end waste recycling initiatives to segregate and recycle the useful materials before it gets into the incinerator "bunker". In fact a defacto MRF before the actual incinerator. From the submissions I have read this is not the case with the Indaver Planning Application.

The proposed technology is not current with modern best practices in Mainland Europe, and will lock in the older technology, for the next twenty – thirty years.

The statement of a need or requirement for capacity in Cork is not examining the current and future capacity and future capacity to produce Solid Recovered Fuels, (SRF) and for the existing capacity of the cement industry to increase the amount of SRF from the waste stream. Currently in Mainland Europe cement kilns use up to 90% energy replacement using SRF and at present the practice in by the cement kilns in Ireland is to use lower amounts than that. This could change of the energy market changes. There are currently five cement kilns on the Island of Ireland and four of them are currently using some SRF and greater capacity therefore exists for the use of SRF. SRF is an indigenous fuel and the biogenic component is of value to the cement industry.

Irish waste is a mixture of commercial and industrial and household waste, largely due to the widely scattered nature of development and housing in Ireland. This affects the quality of the waste and the overall Calorific Value, (CV) which is normally higher, in my experience than the stated average of about 10 MJ/Kg. In my experience, the CV of Irish waste is closer to a CV of 15 MJ/Kg. This fact shall lead to orphaned materials in the waste stream due to the fact that they have a high or very high CV and can only be recovered by going to SRF production facilities.

The South West Regional Planning Guidelines 2010, state clearly that the direction of waste management in the region is to develop Mechanical Biological Treatment and develop Materials recovery facilities , this approach is more suitable to develop and produce sustainable development and leads to higher recovery of resource and materials.

The basic approach is to segregate waste to enable recycling and recovery rather than a “mass Burn” approach which is the direction of the proposed development by Indaver.

In my view the current status quo where waste produced in Ireland is exported to highly efficient facilities in mainland Europe is preferable to using poorer technology and leading to lower levels of recovery. In my view capacity will continue to be available for the foreseeable future and may increase due to fall of waste arising in mainland Europe. We should not construct anything that is of less environmentally sustainable.