



Cork Harbour Alliance for a Safe Environment
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Dear Councillor,

As you will be aware, CHASE has been active in opposing the construction of a Toxic waste incinerator and a Municipal waste incinerator in Cork Harbour. Since the beginning of the campaign much has changed. The scientific evidence is now overwhelming, climate change is a serious global threat, and it demands an urgent response. Mass burning of waste (incineration) would result in the release of millions of tonnes of CO₂ into the atmosphere

The Stern Report 2007 is alerting governments to the importance of reducing Co₂ emissions. The evidence gathered by the Report leads to a simple conclusion that the benefits of strong and early action far outweigh the economic costs of not acting.

Dr John Sweeney's report on Climate Change and Flooding in Ireland on behalf of the EPA, warns of the dangers of building infrastructure in areas that flood.

Recycling of Household Waste in Ireland Third Report Joint Committee on the Environment and Local Government September 2006 report concluded "The Joint Committee recommends Government undertake a close evaluation of Ireland's waste disposal needs. ... Particular attention should be paid to the Waste Management Hierarchy, which promotes avoidance, reuse and recycling, over disposal."

The most recent and comprehensive waste report carried out in Ireland called **Waste Policy, Planning and Regulation in Ireland** said in its 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.

It 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 chief author, Dr Dominick Hogg, said there was an over emphasis on incinerators in local and national plans. He said; "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 Irelands battle to meet EU targets."

The report goes on to explain that incinerators;

- (a) Will take too long to build in relation to the Landfill directive.
- (b) Are no better in respect of climate change than other forms of waste management.
- (c) At the currently planned capacity on a national level, they are likely to compromise even the most modest recycling targets.

It considers other technologies in the Irish context such as Mechanical Biological Treatment (MBT) and concludes that;

- 1. They can help Ireland to meet Landfill Directive targets;
- 2. The simpler forms have a low unit capital cost (even at relatively small scale);
- 3. Several designs are quite flexible in terms of their operation;
- 4. They can be constructed relatively swiftly.

For Ireland, such processes would seem to have much to offer. However, without the enabling regulation, they will remain under-utilised, increasing the likelihood that Ireland will fail to meet Landfill Directive targets simply because the preferred option – thermal treatment – is likely to take too long to implement.

In relation to the Cork situation the report notes that; “Public consultation, however, led to the MBT option as being the “most appropriate strategic direction for the Cork Region”, i.e. recycling, mechanical separation and use of residual landfill without energy recovery (or with, if appropriate, - our comment) is the preferred option in the 2004-9 City Plan).

The MBT approach is mirrored in the 2004-9 County plan and details are expanded to some extent. The plant is described as including a biological phase for both the screened residual waste and also for clean separately collected green waste. Sizing for phase 1 (scaleable by a further 50% for a potential future phase 2) 150,000 tonnes per annum for residual waste and 35,000 for separately collected green waste. Timing for the facilities is still unknown. The county plan states that negotiations are at an advanced stage with a preferred tender and that construction of the facility was intended to commence during 2005.

We now urge you, our public representatives, to take the lead in ensuring that we follow that strategy. It is possible to deal with our waste and meet the landfill Directive without incineration, using a pick and mix of the latest technologies. This has been clearly outlined. As we have already stated in previous correspondence, the benefit of a no burn policy is that; (a) it will conserve global resources, (b) reduce the volume of waste, (c) improve air and water quality (d) reduce our Co2 footprint.

The minister of the Environment, Minister Gormley, has announced a change in National waste policy and has said that incineration is not Government policy. He has spoken of the benefits of MBT and the wide variety of alternative technologies that would be far more appropriate to Ireland and are used in other countries such as Italy, Germany and Austria successfully. We urge you as our public representatives to support the Minister in the new direction and to encourage him to bring in the enabling legislation to allow the rapid development of these technologies.

In the interim we would ask you to be mindful of the review of the County Development Plan. While the Cork Waste Management Plan specifically deals with waste issues, there is provision in the County Development Plan for comment on waste management, ref. page 22 of the Review of the Cork County Development Plan 2003.

As public representatives you must resist at all cost any attempts to include incineration for all the above reasons. The debate on mass incineration is over and only those individuals who will benefit from its profits are still promoting it.

Cork County Waste Plans are very clear and offer us the opportunity to deal with our waste in a most responsible manner, embracing the most up-to-date and environmentally favourable technologies.

In summary, we in Cork can deal with our waste by committing to proper separation of waste streams, the establishment of recycling industries within a county or national level (depending on the economies of scale). The collection and treatment of all organic waste, its treatment using MBT technologies and its use as a soil improver or as treated residual waste to landfill, thus fulfilling our commitment under the Landfill Directive

We would also urge you to retain the zoning of the Ringaskiddy site, which excludes mass incineration, especially considering the severe flooding by the tide that the site experienced in 2004. These events according to Dr. Sweeney's report are likely to become more frequent with increase in sea level and as such would pose a serious threat to the safety of Cork Harbour.

Thanking you for your time and attention. If you require any further clarification of the points made, please do not hesitate to contact me.

A summary and the full edition of Dr. Hogg's report on waste management in Ireland and the Oireachtas report on recycling are available on the CHASE website www.chaseireland.org.

Yours Faithfully,

Mary O'Leary, B.Sc., Dip.Env.Sc.

Chairperson,
CHASE