

Dear Minister Roche,

Cork Harbour Alliance for a Safe Environment, CHASE promotes a wise waste policy for Ireland. Research into international waste practices led us to the view that mass burn incineration was an avoidable and expensive mistake. For the past six years we have been pointing out why that is so and how Ireland's policy makers must do much better.

I am sending you on a synopsis of the most recent report on the waste management situation in Ireland - **Waste Policy, Planning and Regulation in Ireland** ⁽¹⁾ - which 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. It also warns that the way the waste business is regulated could act as a barrier to private firms investing in facilities around the state.

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 Ireland's battle to meet EU targets." He also stated on RTE 19th April, that waste would have to be imported to make incineration viable.

According to the report the Republic will have to meet stringent EU targets on reducing the amount of biodegradable waste going to landfill. It recommends smaller facilities which provide mechanical and biological treatments. These should be examined as alternatives to incineration and landfill.

"Such plants which are popular in Germany, remove recyclable and biological materials through mechanical and biological means. There are alternatives to thermal processes for dealing with residual waste in such a way as to comply with Landfill Directive targets. Enabling regulation is required, this being the responsibility of DOEHLG.

"The supposed superiority of incineration as a treatment for residual waste is increasingly called into question. Analysis undertaken for this report indicates that environmental costs for incinerators are not necessarily lower than those for landfills. This is consistent with work undertaken in the UK by HM Customs & Excise, following on from earlier work for Defra on the Health Effects of Waste Management Options and recent work in the Netherlands. The estimate is based upon damage costs associated with air emissions as estimated by the Clean Air for Europe Programme

"Furthermore, it is not clear that where incinerators are designed to generate electricity only, their impact on climate change is positive. Incinerators generating only electricity are net contributors to greenhouse gas emissions and not, as commonly stated, helping to reduce such emissions. Other waste treatments would appear to perform better in respect of climate change and not all of these generate energy."

Not alone do we have DR Hogg's report but we also have the Stern report and the most recent United Nations stance on Global warming which gives a very severe warning to Governments of the danger of ignoring global warming and doing nothing. Dr. John Sweeney of NUI Maynooth, has also warned the Government of the same danger and the threat of severe flooding in Ireland. The EPA has also agreed.

We cannot keep pumping CO₂ into the atmosphere. Worse still, we shouldn't think of pumping hundreds of thousands of *extra* tonnes of CO₂ into the atmosphere, which would be the consequence of the Government introducing tolling incineration as a way of dealing with our waste.

With the overwhelming scientific agreement on global warming, there can be no justification for burning limited resources and increasing our CO₂ emissions. Ireland is the worst country in Europe at present at controlling its emissions. Ireland needs to meet its commitments to prevent dangerous climate change and this Government must stop wasting our money in the form of taxes by insisting on their ill-conceived policies that fly in the face of all expert advise. There are clearly alternatives to incineration and our waste strategy needs to be revisited as a matter of urgency.

It is time to plan for the future where we have a moral obligation to maintain our solidarity with our EU neighbours in reducing global emissions. Mass incineration has no part to play in how Ireland does this.

Ireland needs to meet its commitments to prevent dangerous climate change and stop wasting our money in the form of CO₂ taxes. The benefit of a no-burn policy is that it will conserve global resources, reduce the volume of waste, improve air and water quality and reduce our CO₂ footprint. These benefits cannot be ignored.

Ireland is at a cross-roads in waste management. If we seize this opportunity, we can enter an era of environmental and health leadership, where Ireland's waste policy does not damage the Irish Environment or the health of its communities, where resources are conserved for future generations - instead of burnt for the profits of a foreign multinational company. If the Government is serious about its responsibility to fulfil its Kyoto commitment, mass incineration has no part to play in Ireland's waste management strategy.

I hope you will consider the above and I look forward to hearing from you
Thank you for your attention.

Mary O' Leary,

Chairperson
CHASE

Further information and discussion can be found on our website on www.chaseireland.org.

(1) - The recent report "Waste Policy Planning and Regulation" was commissioned by Greenstar one of the largest waste firms in the State and carried out by Eunomia, a market leader both in the UK and Europe, providing strategic, technical and policy advice to public and private sector clients.

Waste Policy, Planning and Regulation in Ireland

Final report for Greenstar by Eunomia Research & Consulting Ltd. in association with TOBIN Consulting Engineers.'

Dr. Hogg's report can be read in full on the Greenstar website www.greenstar.ie.