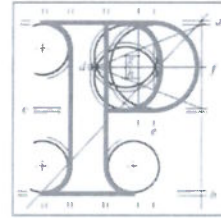


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Indaver Ireland Limited
c/o Conor Jones
Unit 11
South Ring Business Park
Kinsale Road
Co. Cork
T12 X099

Date: 20 July 2026

Re: Proposed development of a resource recovery centre (including waste-to-energy facility)
in Ringaskiddy, County Cork.

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 37F(1)(a) of the Planning and Development Act 2000, as amended, hereby requires you to furnish the following further information in relation to the proposed development:

1. The EU Waste Framework Directive (EU 2018/851, amending EU 2008/98/EC) and European Communities (Waste Directive) Regulations 2011 together stipulate that for incineration facilities dedicated to the processing of municipal solid waste and which were permitted after 31st December 2008, in order to constitute 'recovery' a minimum efficiency rating of 0.65 must be achieved. Where the application documents state that the proposed development will be designed to achieve this minimum efficiency rating, the applicant is requested to demonstrate such compliance, by reference to the R1 calculation formula contained within both the Directive and Regulations.
2. Where the Noise impact assessment contained within Chapter 10 of the EIS is largely based on baseline surveys undertaken in 2018, the applicant is requested to submit an updated noise impact assessment that is based on updated baseline noise surveys.
3. The applicant is requested to submit an updated Climate impact assessment (Chapter 9 of the EIS) that includes a full lifecycle assessment of the proposed facility, in accordance with guidance contained within Transport Infrastructure Ireland publication 'Climate Guidance for National Roads, Light Rail, and Rural Cycleways (Offline & Greenways)'

Teil
Glao Áitiúil
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Website
Email

(01) 858 8100
1800 275 175
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

4. The applicant is requested to submit an updated Material Assets (Chapter 15 of the EIS) impact assessment that addresses the impact on national landfill capacity of annual disposal of bottom ash, in the event that this is the chosen means of final disposal.
5. The applicant is required to submit an updated Air Quality impact assessment (Chapter 8 of the EIS) that addresses the following: -
 - Demonstration of alignment of the dispersion modelling process with EPA guidance 'Air Dispersion Modelling from Industrial Installations Guidance Note (AG4)' (2019), including meteorological data, model selection, building downwash, cumulative assessments, accuracy and uncertainty considerations, and reporting requirements. As part of the updated assessment, consideration shall be given to the use of updated meteorological, terrain and land use datasets that have become available since submission of the original application.
 - Incorporation of the BAT-AEL ranges set out in the BAT Conclusions for Waste Incineration (2019) for all key pollutants, including NO_x, SO₂, dust, HCl and dioxins, and demonstration of how operations will comply with those ranges under normal operating conditions.
 - Assessment of compliance with the 2030 emission limit values under Directive (EU) 2024/2881 at sensitive receptors near the proposed facility, including residential areas and designated habitats, with an explanation of the methodology and assumptions applied.
 - Tabulated flagpole receptor results for discrete sensitive receptor locations, including residential properties (with identification of clusters), designated habitats within 15 km of the facility, and the coastal and water interface, supported by a nested Cartesian receptor grid of appropriate resolution, established in line with AG4 guidance. The applicant shall specify and justify the applied grid configuration, including domain extents and spacing at each nested level, and demonstrate that the grid density is sufficient to resolve predicted concentration peaks at all sensitive locations.
 - Assessment of the combined deposition impacts on designated habitats within 15 km of the facility arising from all relevant pollutants, including oxides of nitrogen, ammonia, sulphur dioxide, hydrogen chloride and hydrogen fluoride, addressing both dry and wet deposition pathways and the combined effects of nutrient loading and acidification.
 - Consideration of the risks arising in the near and mid-field regions from the discrepancy between the Good Engineering Practice building height of 114.25 m, determined within the assessment, and the proposed stack height of 70 m, including the implications for ground-level concentrations at sensitive receptors in the vicinity of the facility.
 - Validation of baseline air quality data collected by the applicant in accordance with EPA AG4 guidance and accepted validation techniques, including a full analysis comparing on-site data with Met Éireann station data within the area.
 - A comparison of the proposed facility's predicted emission profile — including congener profile, particle size distribution and key pollutant concentrations — with operational data from existing waste-to-energy facilities in Ireland from 2014 to date, taking into account similarities and differences in feedstock and abatement technology across the facilities.
 - Assessment of odour impacts from the facility in line with EPA guidance AG4 and AG9, including consideration of process and fugitive odour emissions and the measures proposed to control fugitive emissions during the planned shutdown of the combustion process.
6. European Commission Joint Research Centre technical assessment (European Commission – Joint Research Centre (JRC) EUR 30710 EN (JRC125254) Published May 2021) indicates that PFAS compounds are detectable in flue gas, bottom ash, fly ash and scrubber effluent from municipal solid waste incinerators, and that effective PFAS destruction requires conditions (temperatures exceeding

1,100–1,200°C, residence times of more than 2 seconds, and high excess oxygen) that may not consistently be achieved in conventional MSW incineration. The applicant is requested to submit, as part of the updated Air Quality impact assessment, an assessment of PFAS emissions from the proposed facility, addressing the following: -

- A qualitative review of the types and approximate quantities of PFAS-containing materials likely to be present in the anticipated waste streams, based on the applicant's waste acceptance criteria and characterisation data.
- A description of how the proposed combustion and abatement technology is designed to minimise PFAS emissions, including the combustion temperatures and residence times achievable under normal and worst-case operating conditions, with reference to published technical guidance on the conditions required for effective PFAS destruction.
- A description of the proposed approach to PFAS monitoring across flue gas, bottom ash, fly ash and scrubber effluent, including commitments to emissions testing during commissioning and operation, in line with emerging best practice.
- A preliminary assessment of the potential pathways by which PFAS could enter the environment from the facility via air, ash and aqueous effluent, including the proposed management measures for each pathway, with tabulated results presented for the discrete sensitive receptor locations identified under FI 1 above.
- A statement of the applicant's awareness of the current regulatory gap regarding PFAS from incineration and the proposed approach to tracking and responding to evolving EU requirements, including any BAT-AELs that may be introduced during the facility's operational lifetime.

7. (a) Having regard to the uncertainties identified in relation to the assessment of coastal recession, the applicant is requested to submit a revised Coastal Erosion Assessment and corresponding amendments to Chapter 13 (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession), Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) and Appendix 13.3 (Coastal Erosion Study) of the EIS. The revised assessment shall demonstrate, using an appropriately validated and site-specific methodology, the potential extent of cliff toe and cliff top recession over the lifetime of the proposed development, including the construction period, and under longer-term climate change and sea level rise scenarios. The assessment shall include a clear evaluation of uncertainty, spatial variability, episodic failure mechanisms, groundwater and wave-driven erosion processes, and shall identify credible upper-bound coastal recession scenarios for use in the planning and environmental assessment of the proposed development. The applicant shall also provide a detailed assessment of the role of groundwater seepage and other hydrogeological processes in influencing both cliff toe erosion and cliff top recession, including how these processes may change under future climate conditions and whether they could contribute to accelerated instability, erosion or slope failure within the study area. The EIS shall be updated, as necessary, to reflect the findings of the revised assessment.

(b) Where the revised assessment alters the understanding of coastal recession processes, shoreline position, or the delineation of the present-day High Water Mark relied upon in the application documentation, the applicant shall address potential implications for land ownership, development boundaries, and the applicable statutory consenting regime. The submission shall demonstrate whether any part of the application site lies within the maritime area as defined under the Maritime Area Planning Act 2021 and shall assess the implications of projected coastal recession over the combined construction and operational lifetime of the proposed development for the relationship between the development and the maritime area. The submission should clarify any requirement for consent, licence, or other authorisation under the Maritime Area Planning Act 2021, including engagement with the Maritime Area Regulatory Authority, where appropriate.

8. Updates to the EIS should be presented in a manner consistent with the EPA guidance document 'Guidelines on the information to be contained in Environmental Impact Assessment Reports' (2022), including with reference to the consideration and application of significance categories set out in Table 3.4 and the information required to describe such effects, as contained in Table 3.5 of these Guidelines.

The further information referred to above should be received by the Commission within 6 weeks from the date of this notice (i.e. no later than the **31st August 2026**).

In this regard, please submit 2 hard copies and one electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 37F(2) of the Planning and Development Act 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Kevin McGettigan
Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA11

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902