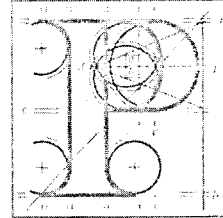


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Conor Foley  
The Cobbles  
Crosshaven  
Co. Cork  
P43 C966

**Date:** 26 November 2025

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

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Commission will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime 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,

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Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

Teil	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## **Formal Objection to the Proposed Indaver Ringaskiddy Incinerator (Ringaskiddy Resource Recovery Centre)**

**To:** The Secretary, An Bord Pleanála

**Re:** Observation/Objection to the proposed Indaver Resource Recovery Centre, Ringaskiddy, Co. Cork

**Case Reference:** PA04.318802

**Name:** Conor Foley

**Address:** The Cobbles, Crosshaven, Co.Cork, P43 C966

**Date:** 10/11/2025

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### **1. Introduction and Summary**

I, Conor Foley, strongly **object to the proposed development by Indaver NV t/a Indaver Ireland at Ringaskiddy, Co. Cork.**

This submission seeks the **outright refusal** of planning permission for the proposed incinerator on environmental, legal, policy, public health, and socio-economic grounds.

The proposed development is **inconsistent with Ireland's national waste management policy, contrary to the principles of the circular economy, damaging to the amenity and tourism value of Cork Harbour, and poses unacceptable environmental and health risks** that have not been adequately assessed in the Environmental Impact Assessment Report (EIAR) or the Natura Impact Statement (NIS).

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### **2. Non-Compliance with National Waste and Climate Policy**

Ireland's **Waste Action Plan for a Circular Economy (2020–2025)** and the forthcoming **National Waste Management Plan for a Circular Economy** both clearly prioritise **waste prevention, reuse, and recycling** over incineration.

The plan specifically cautions against locking the State into long-term incineration capacity that undermines climate and circular-economy objectives.

The Indaver proposal:

- Fails to demonstrate a **genuine need** for additional incineration capacity, particularly given Ireland's existing facilities at Poolbeg and Duleek.
- Risks creating **overcapacity** that would disincentivise recycling and waste reduction.
- Conflicts with Ireland's legal obligation under the **EU Waste Framework Directive (Directive 2008/98/EC)** to follow the waste hierarchy.

- Is inconsistent with Ireland's **Climate Action Plan**, which commits to reducing fossil-based waste incineration and associated CO<sub>2</sub> emissions.

**Therefore**, the proposal is in direct conflict with national and EU waste management law and policy and must be refused under Section 37E of the Planning and Development Act 2000 (as amended).

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### **3. Deficiencies in the EIAR and NIS – Failure to Adequately Assess Health, Environmental, and Cumulative Impacts**

The EIAR and NIS submitted by Indaver contain **significant gaps and omissions** that render them legally and scientifically inadequate under the **EU EIA Directive** and the **Habitats Directive**.

#### **Key Deficiencies:**

- **Air Emissions:** The modelling fails to properly assess cumulative emissions in Cork Harbour, which already hosts multiple industrial sources. There is insufficient baseline monitoring data and inadequate assessment of fine and ultrafine particulate matter (PM<sub>2.5</sub>, PM<sub>1</sub>).
- **Dioxins and PFAS:** The assessment of persistent organic pollutants, including dioxins, furans, and PFAS (“forever chemicals”), is inadequate. Indaver’s own history of PFAS-related waste handling and breaches in other jurisdictions underscores the lack of proven safe management.
- **Public Health:** There is no comprehensive health impact assessment, contrary to WHO guidance and best practice. Local communities and vulnerable populations have not been adequately protected.
- **Habitats Directive Compliance:** The NIS fails to eliminate reasonable scientific doubt regarding likely significant effects on Cork Harbour SPA, Great Island Channel SAC, and nearby marine habitats.

Under EU law, **any scientific uncertainty** about likely significant effects requires refusal unless certainty is achieved — a standard not met here.

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### **4. Track Record and Operator Reliability**

EPA enforcement records demonstrate that Indaver has had **compliance incidents and emissions breaches** at its Duleek facility, confirming operational and monitoring weaknesses.

Additionally, the company’s historic operations abroad have experienced **serious dioxin exceedances** (e.g., Antwerp, early 2000s).

Given this record, there is no assurance that Indaver can operate a hazardous waste incinerator safely within the narrow environmental and emissions limits required. The Board cannot lawfully grant permission without credible, independent evidence of operational reliability — which is absent.

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## **5. Impact on Cork Harbour – a Strategic Economic, Environmental, and Tourism Asset**

Cork Harbour is **one of Ireland's most important natural and economic assets**, supporting:

- Major multinational investment in the biopharma, marine, and port sectors.
- A rapidly growing **tourism and maritime recreation economy**, with Cobh, Spike Island, and Crosshaven among the country's leading coastal destinations.
- Residential and educational institutions (e.g., NMCI, UCC Marine Research Centre) that rely on a clean, safe environment.

An industrial incinerator at this gateway site would **deter future investment**, damage Cork's environmental reputation, and risk long-term negative effects on health, property values, and visitor numbers.

This is contrary to the **Cork County Development Plan**, the **Cork Metropolitan Area Transport and Investment Strategy**, and national spatial policy objectives that designate the harbour for **high-value, sustainable development** — not heavy waste infrastructure.

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## **6. Site Unsuitability and Cumulative Industrial Burden**

Ringaskiddy already hosts several Seveso-classified and high-impact industrial facilities. The addition of another high-emission installation compounds the **cumulative industrial and risk burden** on the community and environment.

The proposal conflicts with the **precautionary principle** under Article 191 of the Treaty on the Functioning of the EU and fails to demonstrate compliance with **proper site selection and zoning principles**.

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## **7. Legal and Procedural Grounds for Refusal**

Under the **Planning and Development Act 2000 (as amended)** and the **EIA and Habitats Regulations**, An Bord Pleanála is legally obliged to refuse permission where:

- The EIAR fails to meet statutory standards.

- The proposal conflicts with EU or national policy.
- Significant adverse environmental or health effects cannot be ruled out.
- The precautionary principle applies due to scientific uncertainty.
- The project undermines sustainable development objectives.

Each of these criteria applies here.

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## **8. Conclusion – Request for Refusal**

In light of the above, I respectfully but firmly request that **An Bord Pleanála REFUSE permission** for the proposed Indaver Ringaskiddy Incinerator on the following overarching grounds:

1. **Contravention of national and EU waste hierarchy and circular economy policy.**
2. **Failure of the EIAR/NIS to meet legal adequacy and precautionary standards.**
3. **Unacceptable environmental and public health risks.**
4. **Negative cumulative, economic, and amenity impacts on Cork Harbour.**
5. **Operator's poor compliance record and lack of demonstrated reliability.**
6. **Unsuitability of the Ringaskiddy site within a sensitive coastal and populated area.**

I request confirmation that this submission has been received and that I be notified of any oral hearing or further procedural steps.

Yours faithfully,

**Conor Foley**

**The Cobbles, Crosshaven, Co. Cork P43 C966**

**10/11/2025**