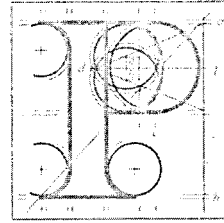


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Dr Stephen Thornhill
1 Upper Park
Cobh
Co. Cork

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.

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,

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

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TO: An Coimisiun Pleanala,
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**OBSERVATION ON SID APPLICATION - Case reference: PA04.318802, Ringaskiddy
Co Cork**

Proposed development of a resource recovery centre (including waste-to-energy facility) by Indaver NV t/a Indaver Ireland

OBSERVER NAME – DR STEPHEN THORNHILL

DATE – 9/11/2025

OBSERVER ADDRESS – 1 UPPER PARK, COBH, COUNTY CORK.

OBSERVATION DETAILS

Firstly, I would like to draw attention to my previous submission to the An Bord Pleanala Oral Hearing on the proposed Indaver facility at Ringaskiddy, County Cork. Case Reference – PL04.PA0010 on 26th April 2016, by myself, Dr Stephen Thornhill, Agri-Food Economist and International Development Consultant and Lecturer in the Food Business and Development Department at University College Cork¹. An updated submission was made under the same case reference on 20th July 2017².

Those submissions in 2016 and 2017 were based on an economic perspective of the proposed facility, highlighting the huge costs and risks in relation to the limited benefits, and the opportunity for a more circular and sustainable approach to resource management that would reduce Ireland's greenhouse gas emissions and air contaminants rather than add to them. Those points remain valid, and even more so today.

Some 10 years later it is even more incredulous that yet another application is now being made to incinerate valuable Irish organic and other recyclable resources, whilst creating huge greenhouse gas emissions and endangering the health of local communities, including burning toxic waste and having to dispose of and store the remaining toxic ash.

¹ Thornhill, Stephen, *Submission to An Bord Pleanala on the Proposed Indaver Facility at Ringaskiddy. An Economic Perspective*, Submission of Evidence Case Reference-PL04.PA0010 (2016).

² Thornhill, Stephen, *Submission to An Bord Pleanala Oral Hearing on the Proposed Indaver Facility at Ringaskiddy - Update to an Economic Perspective*, Case Reference-PL04.PA0010 (2017).

Over the past decade insufficient progress has been made to reduce greenhouse gas emissions both globally and in Ireland. Indeed, last year there was a record year on year increase in global greenhouse gas emissions, making it all but inevitable that the world will break through the 1.5°C Paris Agreement target, which was regarded as the safe limit to prevent triggering irreversible tipping points and ever-increasing catastrophic events^{3 4}.

Allowing a new incinerator to be built contravenes Ireland's climate change commitments to cut greenhouse gas emissions by at least 55% by 2030 and 90% by 2040. Incinerators create huge greenhouse gas emissions, including those produced from organic material, the largest component of municipal waste, that should by law be separated and recycled.

My previous submission in 2017 noted the European Commission's recommendations on the role of waste-to-energy facilities in the circular economy, focussing on waste to energy incinerators. In 2017 the Commission recommended a moratorium on new incineration facilities, the decommissioning of older ones, the phasing out of any support schemes for incineration in favour of higher-ranking processes in the waste hierarchy and introducing and increasing taxes on incineration⁵.

In 2024, incinerators were brought into the EU Emissions Trading System (ETS) to try to discourage incineration as a resource management practice. All greenhouse gas emissions from incineration now have to be reported and emissions allowances will decrease each year under the ETS to reach the 55% and 90% cut in emissions by 2030 and 2040 respectively. So it's not clear how the existing incineration plants in Ireland will continue to operate over the next decade, let alone an additional one, with such a restriction on emission allowances.

Furthermore, the biogenic emissions (those from burning organic material) have to be reported but are not currently included in the emissions reduction targets as they are regraded as carbon neutral. In fact they are far from being carbon neutral as the organic material incinerated could have been used to produce organic fertiliser and compost, which can replace synthetic fossil-fuel based fertiliser whose manufacturing process results in huge emissions. The incineration process also destroys valuable phosphates

³ 'Secretary-General's Remarks at the Belém Climate Summit - "10 Years of the Paris Agreement: NDCs and Financing" [as Delivered] | Secretary-General | United Nations', 7 November 2025 <<https://www.un.org/sg/en/content/sg/2025-11-07>> [accessed 10 November 2025].

⁴ United Nations Environment Programme, *Emissions Gap Report 2025: Off Target - Continued Collective Inaction Puts Global Temperature Goal at Risk* (United Nations Environment Programme, 2025), doi:10.59117/20.500.11822/48854.

⁵ EC (2017). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on The role of waste-to-energy in the circular economy. COM (2017) 34 final

which could otherwise have been recycled and prevent the diminishment of finite planetary supplies of phosphate⁶.

Organic fertiliser and compost also improves carbon storage in soils and can reduce the amount of nitrate leaching and nitrous oxide emissions. Nitrate leaching and the resulting waterway pollution is a particular problem for Irish farmers who are seeking another nitrate derogation from the EU Commission due to their relatively high application of fertiliser and slurry manure, particularly by dairy farms⁷. Rather than incinerating valuable organic resources, Ireland should be investing in more Anaerobic Digestion (AD) plants which can use organic waste, manure and slurry to produce organic fertiliser and biogas as an energy source.

Incinerators provide little incentive to reduce food and other so-called “waste” resources, requiring huge amounts of valuable resources to burn and keep their plants running. The EU Waste Directive was recently revised to ensure that food waste is cut by 30% by 2030, and that overall recycling rates reach at least 60% by 2030 and 65% by 2035. The proposed incinerator would make it more difficult to achieve the EU Waste Directive targets that Ireland has already agreed to and would indicate a worrying lack of policy coherence between the national government and local planning authorities⁸.

The EU Waste Directive also contains a Waste Hierarchy that member states must adhere to. This clearly states that the first priority is “prevention” of waste: incinerators do the opposite by discouraging the reduction and recycling of so-called “waste material” and creating an incessant demand for materials to burn and destroy.

Recovery requires the separate collection of materials in preparation for re-use and recycling, the second highest priority in the waste hierarchy, with specific instruction in the Directive to avoid incineration and to reach at least 60% of all municipal waste prepared for recycling by 2030 with further increases after that. More planning emphasis should therefore be placed on material recovery and recycling plants. These can help to supply recycled materials reducing the impact on the planet of having to produce new materials, which often leads to increased greenhouse gas emissions.

It is worth noting that even landfills (where methane is also often captured on modern sites) allow for potential recovery of materials unlike incineration. Materials used to generate energy or as fuels shall not be counted towards the attainment of recycling targets. Energy recovery from municipal waste is one of the most inefficient ways of

⁶ ‘Understanding Phosphorus: Global Challenges and Solutions’, 24 January 2024
<<https://www.unep.org/news-and-stories/story/what-phosphorus-and-why-are-concerns-mounting-about-its-environmental-impact>> [accessed 10 November 2025].

⁷ Kevin O’Sullivan, ‘Ireland Seeks Extension to Nitrates Directive’, The Irish Times, n.d.
<<https://www.irishtimes.com/environment/2025/10/08/ireland-eu-nitrates-directive-derogation-water-quality-pollution-martin-heydon-agriculture-agri-food/>> [accessed 10 November 2025].

⁸ European Commission, Directive 2008/98/EC of the European Parliament and Council on Waste (Consolidated Version with Amendments), EC Directive 2008/98/EC, 2008.

producing energy and destroys many materials that could otherwise have been put to better use.

New EU Extended Producer Responsibility obligations require waste minimisation in the manufacturing process and longer lifespans of products, in contrast to the strategy of planned obsolescence used to maximise profits whilst placing huge pressure on planetary resources. The Polluter Pays Principle also requires polluters to deal with and account for the waste they produce. In the case of unavoidable toxic waste (most is avoidable through changes to production processes) the polluter should clearly deal with and pay for the toxic waste they produce. Given the complexity of different types of toxic waste it is clearly more suitable for it to be dealt with by the organisation responsible for the pollution in that locality (eg onsite), rather than having a centralised plant to which all the different types of toxic waste would have to travel and the huge risks and transport emissions involved with that and the potential difficulties and issues associated with such different toxic wastes⁹.

Climate change and the ever-increasing extreme weather events envisaged for the foreseeable future, bring new risks to large scale operations, particularly where dangerous materials such as toxic waste are involved. Global heating of more than 1.5°C is all but inevitable, increasing the likelihood of global tipping points being breached, including polar ice sheets and faster than previously expected sea level rise^{10,11}. Even more worrying are the increasingly extreme weather events that have already occurred and will continue to intensify in the coming years, with the likelihood of hurricanes and storm surges hitting Ireland in the coming decades.

Climate change adaptation necessitates new ways of developing infrastructure, ensuring that potentially dangerous facilities are located in safe areas, and certainly not in coastal locations subject to storm surges and hurricane force winds. Noone et al (2024) note that *“storm surges and extreme waves pose an ever-increasing threat to Ireland as sea levels continue to rise, including to many of our coastal cities, such as Cork, Dublin, Galway and Limerick, and to critical infrastructure”*¹². It would be unsafe and a dereliction of duty of care to nearby residents to allow a toxic incinerator to be built in such a vulnerable location.

The site is located on a known flood risk area, that will become increasingly prone to sea level rise and storm surges associated with increasingly extreme weather episodes (see Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW

⁹ European Commission, Directive 2008/98/EC of the European Parliament and Council on Waste (Consolidated Version with Amendments).

¹⁰ Benton, T. et al (eds), *The Global Tipping Points Report 2025* (University of Exeter, 2025).

¹¹ Chris R. Stokes and others, 'Warming of +1.5 °C Is Too High for Polar Ice Sheets', *Communications Earth & Environment*, 6.1 (2025), p. 351, doi:10.1038/s43247-025-02299-w.

¹² Noone et al, *Clare, Irelands Climate Change Assessment*, Volume 1 (EPA and Government of Ireland, n.d.).

floodinfo.ie (Flood Summary ID-1364, 13082, 12085)). Mitigation measures to locate the facility at levels significantly above conservatively projected flooding levels would exacerbate the negative visual impact of the proposed large structure and would not detract from the danger of hurricane force winds hitting coastal areas first at maximum strength before dissipating inland. It is therefore the considered opinion of many experts that the site is inherently unsuitable for location of a use which processes, and generates hazardous compounds (eg Oznur Yukel Finn, 2009).

Notwithstanding the information submitted in August 2025, the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by M28 on the other. It is considered that the actual usable area of the site is inadequate in relation to the scale of development proposed. (Derek Daly, 2017).

By all 3 Bord Pleanála Inspectors, the EIS was found to be deficient in substance even where found legally adequate in form. The information as submitted to the Board is therefore insufficient to enable the Board to carry out an environmental impact assessment in an appropriate manner, and to form a basis for an informed decision on the application (Daly, 2017). Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.

There is no de novo site selection in the material submitted in 2025, but instead a justification based on site ownership by Indaver, with inadequate consideration given to major public and private investment initiatives which have transformed the character of the immediate area in the intervening period since 2000 (Daly 2017).

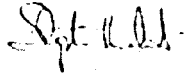
Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the Indaver site area where the incinerator build is proposed (RY-I-09) is zoned as suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. (RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28) This is dismissed in the August 2025 information but it is of critical importance that this zoning be upheld as it is directly linked to the investment in the NMCI and MaREI Campus areas and the potential for future growth of this sector. The proposed incinerator is therefore in direct contravention of the County Development Plan and contrary to the specified objectives for the immediate area.

Please refuse this planning application based on the above points, including that the site is inherently unsuitable, as previously concluded by all 3 Bord Pleanála Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017) and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site.

I wish to request an Oral Hearing to continue full public participation in this application.

I have already submitted in 2016 so have paid prior fee.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Sgt. (L.L.)". The signature is written in a cursive style with a horizontal line underneath.

Dr Stephen Thornhill.