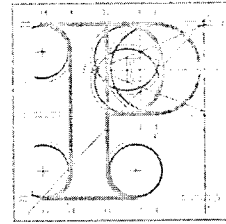


Our Case Number: ABP-318802-24
Planning Authority Reference Number:



An
Coimisiún
Pleanála

Eileen O'Brien & Pat Murphy
1 Church Bay
Crosshaven
Co. Cork
P43 KN07

Date: 13 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

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

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|--------------------|---------|--|
| Teil | Tel | (01) 858 8100 |
| Glaó Áitiúil | LoCall | 1890 275 175 |
| Facs | Fax | (01) 872 2684 |
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| | |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1 | Dublin 1 |
| D01 V902 | D01 V902 |

TO: An Coimisiun Pleanála, 64 Marlborough Street, Dublin 1, D01 V902

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: Eileen O'Brien & Pat Murphy **DATE :** 7th November 2025

OBSERVER ADDRESS: 1 Church Bay, Crosshaven, Co. Cork. P43 KN07.

OBSERVATION DETAILS:

- Notwithstanding the information submitted in August 2025, the site is fundamentally **too small** for the proposed project 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 it was 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)
- The site is located on a known **flood risk area**, marked as same in Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW floodinfo.ie , (Flood Summary ID-1364, 13082, 12085). Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure. It is my considered opinion that the **site is inherently unsuitable for location of a use which processes, and generates hazardous compounds.** (Oznur Yukel Finn, 2009)
- 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. I ask the planning board to respect Government policy for Cork Harbour which is set on a very definite and positive path, referring to the positive policy initiatives advancing the Harbour as a resource and location for sustainable development, recreation and a developing tourism infrastructure.
- The proposed project of an incinerator in Cork harbour will have a **negative impact on the tourism industry.** Cruise liners are highly valuable to Cork's economy, with the 2025

season estimated to generate €17 million in revenue. The proposed location would be an eyesore in the Cork Harbour which is considered an area of natural beauty.

- The proposed site is within the Cork Harbour Special Protection Area 004030- S.I. No. 391/2021 European Union **Conservation of Wild Birds** Regulations 2021. Cork harbour is home to many rare birds and curlew habitats. I would dispute the Natura2000 report submitted by Indaver which claims it will have no negative impact on the protected birds and species in the area on the grounds of independence of conclusions arrived at.
- **Human Health** needs the same standard as protected species. The proposed project will add to the generation of **smog** in the area. Also, the **toxic fumes are of major concern** to the local population. Toxicopathologist and nano-particulate expert, Professor Vyvyan Howard, speaking at Oral Hearing April 26th, 2016 (Day 6) said that “Chronic low dose exposure to ultra fine particles reduces life expectancy” and cited several published studies which show that “filters are not capable of arresting these particles” which “pass through any filtration system undetected” and also warned that **statutory limits are not protective**. He summarised by saying there is “**No safe level of exposure to tiny particulates**”.
- **Brussels, 1 April 2025** – A series of new studies reveal **alarming levels of dioxins, PFAS, and heavy metals in the environments surrounding waste incinerators in Spain, France, and The Netherlands**. Conducted by the independent ToxicoWatch Foundation with support from Zero Waste Europe, the findings show that the areas around Waste-to-Energy (WtE) facilities are contaminated, posing risks to public health, ecosystems, and food safety. The studies, conducted near WtE facilities in Paris, Harlingen, and Zubieta, revealed widespread and dangerous levels of contamination in soil, water, vegetation, and even food such as farm eggs. Dioxin levels in moss, soil, and backyard chicken eggs exceeded EU limits at all three sites, with serious concerns for one sample site in Paris’ Ivry-sur-Seine district, a schoolyard playground. In Harlingen, PFAS concentrations in water were recorded at 138 times the Dutch legal drinking water threshold, while in Zubieta, a backyard egg sample from Hernani showed the highest dioxin levels found by the ToxicoWatch Foundation in Europe over the past 13 years. Heavy metals including lead, mercury, and arsenic were also detected in areas close to homes, parks, and schools. Janek Vahk, Zero Pollution Manager at Zero Waste Europe, states: “These findings amount to a systemic failure of environmental oversight. Communities living near incinerators are being exposed to toxic chemicals, in some cases at levels far beyond what the law permits. This should raise immediate red flags across the EU.” In Zubieta, located in Spain’s Basque Country, the situation is just as stark. A backyard egg sampled in Hernani contained 38 pg TEQ/g fat — over 10 times the EU legal limit — representing the highest dioxin reading recorded by ToxicoWatch in Europe. Moss samples show dioxin concentrations up to 300 times higher than baseline levels measured before the incinerator began operating in 2020. PFAS and heavy metals were also found in water, moss, and soil. In Paris, soil and moss samples taken near schools and public spaces in Ivry-sur-Seine showed dioxin levels above EU safety thresholds. One such site, the Jardin des Plantes — a central Parisian park located 2.5 km from the incinerator — was found to be contaminated. This adds to growing evidence of exposure in urban settings, particularly affecting vulnerable populations such as children. France’s national health agency has already confirmed that backyard chicken eggs in the region are too polluted to consume, due to dioxins and PFAS. In Harlingen, the Netherlands, PFAS levels in eggs were found to be comparable to those found near a major fluorochemical plant — despite no such industry operating nearby. One water sample recorded PFAS concentrations 138 times the Dutch legal limit, and dioxin levels in soil have increased sevenfold since 2013. Heavy metals such as mercury and lead were detected in mosses at levels that exceed thresholds associated with significant

health risks. Abel Arkenbout, Head of Research at ToxicoWatch, states: “This is a textbook case of toxic accumulation in the environment and food chain.” Zero Waste Europe is calling on EU institutions and national governments to urgently take action. This includes introducing mandatory, real-time monitoring of POP emissions from all Waste-to-Energy facilities, particularly during non-standard operations (OTNOC), which remain underregulated and are frequently the source of emissions spikes. Regular biomonitoring must also be carried out in areas surrounding incinerators, with a focus on food-producing zones and vulnerable populations. More broadly, the findings reinforce the need for a rapid transition toward non-burn, zero waste alternatives to protect public health and the environment. “These results dismantle the myth that waste incineration is a clean or safe solution,” added Vahk. “*The era of burning waste must end.*”

- **There are major cancer concerns in Cobh which are 43% above the national average** as outlined by local students who spoke at the 2009 planning hearing. “I am sure you will agree that these figures are too high”. They requested that further investigation was needed before anything new is introduced. The students called for a **Baseline Study of health in Cork Harbour** to be carried out immediately. This study has still not been carried out. Health studies on landfills and incinerators show some evidence of increased risks for adverse birth outcomes, certain cancers, and respiratory and mental health issues.
- Incinerators produce several waste products, including **flue gases, ash, and minute dust particles**. The flue gases can contain pollutants like [heavy metals](#), [dioxins](#), and [furans](#), while the ash and dust can also be toxic and harmful if inhaled. If implemented, the plan would process 240,000 tonnes of waste annually, with 10% of this amount classified as 'suitable hazardous waste.' The remaining ash is often hazardous and must be disposed of in a hazardous waste landfill. Because of the proximity principle, this landfill should ideally be located close to the source of the ash. These products are considered hazardous and require specific disposal methods, such as **transport to a hazardous waste landfill**. The proposed landfill site is **Bottlehill** which is 44.5 km via the N20 which is through the city. This in itself will have an environmental impact with a minimum of 9,600 trucks required to bring the waste to the landfill. The planning and environmental documents submitted by Indaver include baseline water and groundwater studies, plus standard design measures like sealed drainage, bunding, and fire-water containment. However, there is **no independent, long-term groundwater or water-quality monitoring programme published for the Ringaskiddy site itself or Bottlehill**—only the general obligation that the EPA would require monitoring if a licence were ever granted. This is not good enough for any planning board to accept.

See: 1: Planning Report (Coakley O’Neill, August 2025) — section on “Waste Outputs and Logistics.” 2.Environmental Impact Assessment Report — chapters on “Hydrology,” “Surface Water,” and “Waste Management.” 3. EPA Licence Application — Attachment 4.3.5 (“Waste Handling”). 4. EPA AERs for Dublin and Meath Waste-to-Energy plants — to see how ash storage and exports work in practice. 5. EPA’s National Hazardous Waste Management Plan 2021–2027 — explains why Ireland still exports hazardous residues.

Please refuse this planning application on the basis that the site is inherently unsuitable, concluded by all 3 Bord Pleanala 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 include €50 fee with this objection.