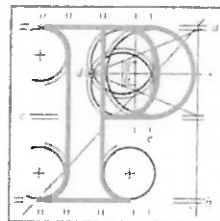


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Lisa Myers
17 Ardross Court
Crosshaven
Co. Cork

P43 W718

Date: 18 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.

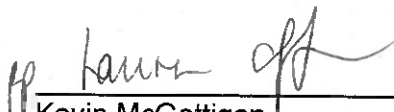
The Commission will revert to you in due course with regard to the matter.

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

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Ref: **Case reference: PA04.318802**

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: Lisa Myers

DATE 11/11/25

OBSERVER ADDRESS: 17 Ardross Court, Crosshaven, Co Cork. P43W718

OBSERVATION DETAILS : As below

Please find enclosed my objections to the proposed Incinerator in Ringaskiddy by Indaver for your careful consideration.

Rezoning

- Notwithstanding that the zoning of the site and greater Ringaskiddy area has been changed from industrial to Educational. This was proposed & approved in the County Development review in 2017 and was subsequently upheld in the 2022 review. The Cork County Development Plan 2022 has been prepared in accordance with the steps set out in the Planning and Development Acts. The Elected Members of Cork County Council have adopted the Cork County Development Plan 2022-2028 at the Full Council Meeting held on Monday 25th April 2022 and it came into effect on Monday 6th June 2022.

www.corkcoco.ie/en/resident/planning-and-development/cork-county-development-plan-2022-2028

It is expected to remain in force (subject to any interim variations that the Council may make) until 2028. It is a six year development plan for the County that attempts to set out, as concisely as possible Cork County Council's current thinking on planning policy looking towards the horizon year of 2028. The plan also sets out the overall planning and sustainable development strategy for the county which must be consistent with the National Planning Framework 2018 and the Southern Region Regional Spatial and Economic Strategy and Cork Metropolitan Area Strategic Plan (MASP) 2020.

The zone where the Indaver proposed development is proposed (RY-1-09) is zoned as suitable for the extension of Third level educational campus and enterprise related development including marine related education, enterprise. It is critical to investment and development of NMCI and MaREI campus areas and potential for future growth of this sector, including student accommodation.

Size of the Site

- Since the initial proposal in 2001 the site has significantly been reduced in size and together with coastal erosion on one side, reduced boundary from M28 the scale of the development is unsuitable for the size of the site then and more notably now. (Derek Daly, 2017).
- The surrounding area has developed significantly since the initial submission, with no de nova site selection in the material submitted in 2025, but instead justification based on site ownership by Indaver. (Derek Daly, 2017).

Environmental/Health

- The plans have already been rejected by 3 Bord Pleanala Inspectors.
- The EIS where found was deemed inadequate in substance, even where found legally adequate in form. Therefore, this means that the information submitted to the board is inadequate and there the board are unable to carry out impact assessments in order to carry out an informed decision. . (Derek Daly, 2017).
- I object on the grounds that "Incinerators are one of the most toxic, expensive, dangerous, and climate-polluting industries. Falsely advertised as a solution to a waste crisis that stems from over production and consumption, incinerators not only deter funding from strategies that offer real solutions, but are manifestations of environmental racism. Incinerators emit 68% more greenhouse gases per unit of energy than coal plants. Despite being a major contributor to climate change, the incinerator industry stays afloat by relying on renewable energy credits, costly subsidies, and externalized costs. Public money—millions in tax dollars—is in this way siphoned into incinerators and taken away from *real* renewables and other sustainable solutions that are significantly more cost-effective" <https://www.no-burn.org/incineration>
- The EIS proposed omits proper integration of hydrological pathways and emission fallout to the Cork Harbour SPA contrary to Regulation 42 of S.I. 477/2011 and Holohan C-461/17 based on the requirement to consider all possible interactions. They omit CHG and pollutant links to protected habitats. Additionally, there are no assessments completed for atmospheric deposition or acidification impacts on Cork Harbour SPA (004030) and Great Island Channel SAC (001058).

- I object based on the breach of Regulation 42 of S.I. 477/2011 and Article 6 (3) of the habitat directive.
- Clearing the air: The truth behind waste incineration. Is a documentary on another waste to energy facility called Central Materials Recovery Facility located in Dumaguete City, Philippines "For too long, communities living near waste incinerators in the Global South have suffered in the dark. Local governments and regulatory agencies charged with protecting their health have failed to monitor these facilities' pollution levels, allowing them to continue unchecked. Thick clouds of smoke choke up the places where children play, where the elderly gather, and where workers make their living.

In three communities– Dumaguete City, Philippines, Ogiyo, Ogun State Nigeria, and Surabaya City, Indonesia–GAIA members have decided to take matters into their own hands. Equipped with small, portable air quality monitors, volunteers measured the levels of pollutants in the air nearby the facility on a regular basis, sometimes at great personal risk, and witnessed exactly what they were breathing in. The results confirmed their fears. Now community leaders are using this data to call on their local governments to enforce stricter environmental regulations and monitoring for polluting facilities, if not shut them down altogether.

In all of the three monitoring sites, particulate matter levels (PM 2.5 and 10) were much too high for human health and safety. PM2.5 levels were 5-8 times higher and PM 10 were between 3-5 times higher than the [guidelines set by the World Health Organization](#) [GAIA GLOBAL ALLIANCE FOR INCINERATOR ALTERNATIVES](#)

- Despite revisions the updated EIS information continues to rely on outdated material without evidence. (Derek Daly, 2017).
- In Europe waste incinerators are on the rise, often being promoted as a safe way to dispose of waste. The way emissions are being measured only represent a tiny snapshot of the incinerators output, meaning not all incineration emissions are evaluated. In a recent study by Zero waste Europe who co-ordinated biomonitoring research on incinerator emissions across Europe, working with Toxicowatch to determine the real health and environmental impacts of waste incineration emissions. These studies included analysis of persistent organic pollutants (POPs) in the surroundings of incinerators by using bioassays, primarily from Eggs in farmyards, Fruit and Veg, vegetation, soils, sediments, water, sheep wool etc. The results definitively concluded Dioxin contaminated eggs exceeding EU limits and indicating industrial incineration as a source. As well as heavy metals in soil, lead (110mg/kg) and arsenic (48mg/kg) levels present significant risks especially to children at nearby playgrounds.

The list goes on and on to find persistent organic pollutants in the environment a waste incinerator in the Netherlands and amongst the findings high levels of dioxins were found in eggs of backyard chickens found in a farm 3km from the incinerator. A high percentage of eggs exceeded the safe level of consumption. The findings are from multiple locations in multiple countries. The biomonitoring research is a warning and its is indicative of the contamination of the environment and the toxic substances such as dioxins, PCBs, PAHs and PFAS. In conclusion the report raised serious concerns about the region's health and the health of those living near the incinerators and based on these findings of this Biomonitoring research, Zero waste Europe recommends

- Mandatory biomonitoring for all existing incinerators
- Mandatory continuous measurements of chlorinated and brominated dioxins
- **A moratorium on new waste incineration projects**
- **Develop phase out plans for existing ones**
- Promote and fund circular healthy sustainable alternatives to waste incineration.

(This is what we should we concentrating our efforts on, reducing our waste, but of course there is no money to be made on this!)

zerowasteurope.eu

- I object based on the fact that incineration is an outdated unsustainable method for waste. We keep creating all this waste instead at looking at ways of reducing the waste we create. And if we don't create enough of it shur we can just import someone else's waste. In a recent study communities living near incinerators maybe most at risk. It concludes that .."we must avoid industrys false solutions like waste incineration and instead invest in sustainable Zero waste policies that promote a truly sustainable future" arnika.org (Press release 2024)
- I object on the basis of Cork Harbour is a large, natural basin in County Cork, Ireland, formed by a ria (a coastal inlet) created by post-glacial sea-level rise. It is the second-largest natural harbour in the world and because is it a basin current climate and weather patterns, the geolo
- I object to the additional estimated 9500 ca trucks on the road (regardless of the new M28).

Wildlife Protection

- I object to this planning on the basis of harm or injury to our cetacean population in the surrounding harbour of this proposed site. There are frequent sightings of Dophins in Cork Harbour adjacent to this site. <https://iwdg.ie/bottlenose->

dolphins-in-cork-harbour, <https://www.corkbeo.ie> Dolphins in Cobh.
[www.reddit](https://www.reddit.com).

- Dolphins are sensitive to incinerators, as the toxic chemicals released during waste incineration can enter the ecosystem and accumulate in the food chain. Specifically, pollutants like mercury and other heavy metals from burning fossil fuels and waste can be harmful. These toxins can be taken up by smaller fish, and then concentrated in dolphins that eat them, potentially harming their reproductive, immune, and endocrine functions.
- All cetaceans (dolphins, whales, and porpoises) are protected under the Wildlife Acts (1976-2018). It is an offense to hunt, injure, or disturb them.
- **EU Habitats Directive:** This directive requires member states, including Ireland, to protect species and habitats of community interest. Bottlenose dolphins and harbor porpoises are listed as species needing strict protection within designated areas like [Special Areas of Conservation \(SACs\)](#).
- **International Agreements:** Ireland is a signatory to agreements like the [OSPAR Convention](#), which commits the country to establishing marine protected areas to safeguard biodiversity. International Agreements: Ireland is a signatory to agreements like the OSPAR Convention, which commits the country to establishing marine protected areas to safeguard biodiversity.

In accordance with our National Parks and Wild life Services " n 2007 the European Court of Justice ruled that Ireland had failed to fulfil its obligations in relation to inter alia Article 12 of the Habitats Directive (Case C-183/05). The [Conservation Plan for Irish Cetaceans](#) (📄 [5MB]) was prepared as part of Ireland's response to this judgement and was finalised in December 2009 following extensive statutory and public consultation. This Plan provides comprehensive information concerning the ecology of all cetacean species occurring in Ireland. It identifies the primary pressures and the administrative and scientific gaps that pose a threat to their protection, and identifies clear measures required to ensure such threats are addressed. The Plan consists of five main programmes of measures presented in a [Delivery Grid](#) (updated May 2015) against which progress can be clearly measured. Details of a [National Cetacean Protection Strategy](#) (📄 [53KB]) have also been elaborated. This three-pillared approach underpinned by the Conservation Plan for Cetaceans in Irish Waters focuses on (i) designating and monitoring SACs, (ii) ensuring general regulatory and administrative functions are sufficiently rigorous, and (iii) pursuing an integrated strategy for general surveillance of cetaceans" www.npws.ie/marine/marine-species/cetaceans

- I object on the grounds of [S.I. No. 391 of 2021 EUROPEAN UNION CONSERVATION OF WILD BIRDS \(CORK HARBOUR SPECIAL PROTECTION AREA](#)

004030) REGULATIONS 2021. The wildlife knows no boundaries and therefore the wildlife in the proposed site will be impacted by the SPA regulations of 2021.

- The area known as Cork Harbour Special Protection Area 0004030 is situated in the county of Cork being the land and waters enclosed on the map (contained in Schedule 1) within the inner margin of the red line and hatched in red and is situated in whole or in part in the townland[s] of Aghada, Ardmore (E.D. Monkstown Rural), Ashgrove (E.D. Cobh Rural), Ballincarroonig, Ballincurragh (St. Finbar's Ph), Ballinlough (St. Finbar's Ph), Ballinlough (St. Finbar's Ph) (part of), Ballintaggart, Ballintubbrid East, Ballintubbrid West, Ballinure (St. Finbar's Ph), Ballinvarrig (E.D. Farranbrien), Ballyannan, Ballybricken, Ballydaniel Beg, Ballydaniel More, Ballydaniel More (part of), Ballyellane, Ballyfouloo, Ballyhennick, Ballynacorra, Ballynacorra West, Ballynacrusa, Ballynafarsid, Ballynaron, Ballynatra (E.D. Cobh Rural), Ballytrasna (E.D. Caherlag), Ballyvodock East, Ballyvodock West, Barnahely, Barryscourt, Bawnard West, Belgrove, Belvelly, Belvelly (part of), Brown Island, Carrigaline East, Carrigaline Middle, Carrigrenan, Carrigtohill, Castleredmond, Coolmore (E.D. Carrigaline), Cork, Corkbeg, Courtstown, Currabally, Currabally (part of), Curraghbinny, Douglas, Dunkettle, Fanick, Foaty, Fountainstown, Frenchfurze, Garranekinnefeake, Garryduff (E.D. Midleton Rural), Glashaboy River, Glebe (E.D. Midleton), Gortigrenane, Harpers Island, Hoddersfield, Hop Island, Inchera, Jamesbrook, Johnstown (E.D. Carrigtohill), Kilbeg (E.D. Farranbrien), Killacloyne, Killahora, Kilmichael East, Kilmichael West, Kilnaglery, Knockanemorney, Lackenroe, Lota More, Loughatalia, Loughbeg, Mahon, Marino, Monfieldstown, Monkstown (Castle Farm), Mosestown, Mounthovel, Oatencake, Pembroke, Poulacurry South, Raffeen, Rathcoursey East, Rathcoursey West, Ringabella, Ringaskiddy, Rochestown (E.D. Douglas), Rosslague, Rossmore (E.D. Carrigtohill), Rostellan, Shanbally (E.D. Carrigaline), Townparks (E.D. Midleton), Tullagreen and Wallingstown.

Schedule 4 Regulation 5 Activities requiring consent of Minister ARC Code
Description

ARC 01 Reclamation, including infilling.

ARC 03 Blasting, drilling, dredging or otherwise removing or disturbing fossils, rock, minerals, mud, sand, gravel or other sediment.

ARC 06 Introduction, or re-introduction, of plants or animals not found in the area. [Consent is not required for the planting of crops on established reseeded grassland or cultivated land.] [391] 9

ARC 09 Construction or alteration of tracks, paths, roads, bridges, culverts or access routes.

ARC 15 Burning, topping, clearing scrub or rough vegetation or reseeded.
[Consent is not required for these activities on established reseeded grassland or cultivated land provided it is greater than 20m from a river, stream or floodplain; or greater than 50m from a wetland, lake, turlough or pond.]

ARC 25 Drainage works including digging, deepening, widening or blocking a drain, watercourse or waterbody.

ARC 29 Planting of trees or multi-annual bioenergy crops.

ARC 31 Developing or consenting to the development or operation of commercial recreational/visitor facilities or organised recreational activities.

ARC 36 Harvesting marine invertebrate species in intertidal areas.

ARC 37 Driving mechanically propelled vehicles in intertidal areas, except over prescribed access routes.

Health

- Incineration doesn't eliminate waste it transforms it into gases, fine dust and ash all containing harmful pollutants.
- Health effects (per WHO and IARC) include cancer, heart defects, respiratory illness, immune and hormonal disruption, birth defects and learning difficulties.
- The British Society for Ecological Medicine (2005) concluded that no new incinerators should be built due to health risks of fine particles. The primary reason cited is that incinerators create fine particles (dust), which are toxic and carcinogenic. The report links fine particle emissions to an increased risk of various health problems, including respiratory and cardiovascular diseases, and cancer. This conclusion was based on evidence presented by medical experts and is supported by other reports and studies that have raised concerns about the health effects of waste incineration.
- No Health impact assessment was conducted or required by An Bord Plenala?
- The Environmental Protection Agency (EPA) estimate that each year there are 1,300 premature deaths in Ireland due to air pollution. The burning of bituminous coal and other smoky solid fuels releases particulate matter into the atmosphere. The most harmful of these, PM2.5 particles, have been proven to have a significant detrimental effect on human health. The elderly, the very young and other vulnerable groups, such as people with respiratory conditions, are particularly at risk.
- Medical research has shown links between the burning of bituminous coal in private houses and increased health risks including heart attack, stroke, cancer,

brain tumours, asthma, bronchitis, bronchiolitis and many other cardiac and respiratory conditions.

- The new regulations are being introduced across a range of fuels to ensure that the most polluting solid fuels will no longer be available for sale on the Irish market. The regulations apply to all solid fuels used for domestic heating purposes: coal and coal-based products, turf, peat briquettes, wood and manufactured solid fuels including manufactured biomass products.
<https://www.corkcoco.ie>
- Cork has specific "low smoke zones" primarily in built-up areas, with a nationwide ban on smoky coal in effect since October 2022. While smoky coal is banned nationwide, you cannot burn waste or treated timber in a domestic fire in any area. New regulations governing the burning of solid fuels in the home will come into effect on October 31st 2022. **The Air Pollution Act 1987 (Solid Fuel) Regulations 2022** aim to build upon previous efforts to improve air quality across Ireland and to reduce premature deaths and illnesses arising from air pollution
- The main difference is that incinerator smoke, especially from modern, regulated facilities, is subject to emissions controls, while domestic fires (especially uncontrolled burning of waste) can release high concentrations of toxic pollutants like **dioxins** and **particulate matter**. However, both can negatively impact health through the release of harmful substances.
- Continuous baseline assessments for incinerators in Ireland are primarily driven by the **Industrial Emissions Directive**, requiring a baseline report before operation begins to assess potential soil and groundwater contamination. Furthermore, continuous monitoring of air emissions, including substances like **dioxins** and **furans**, is mandated through **Integrated Pollution Control (IPC)** licensing conditions to ensure compliance with strict limits. Assessments also cover other environmental impacts like noise, with the **Environmental Protection Agency (EPA)** using data from annual surveys to verify continuous noise levels. **HOWEVER, a baseline report has not been completed.**

Bias

- How can we objectively complete approval of this proposal, if the Director General of the EPA " The Environmental Protection Agency (EPA) is responsible for protecting and improving the environment as a valuable asset for the people of Ireland. We are **committed to protecting people and the environment from the harmful effects of radiation and pollution**. We play key roles in environmental regulation, provision of knowledge and advocacy for the environment. (This role is currently being advertised it is imperative that the appointee is dependant and is truly " **committed to protecting people and the environment from the harmful effects of radiation and pollution**"

- The EPA provides environmental data, assessments and evidence to inform decision making and implements effective regulation and environmental compliance systems – while working with others to advocate for a clean, healthy and well protected environment and sustainable environmental behaviour." was formerly employed by Indaver as Project Manager for their Cork incinerator project!
- " The Cork Harbour Alliance for a Safe Environment claims the appointment of Laura Burke is inappropriate because her work for Indaver Ireland on the Ringaskiddy incinerator project constitutes a conflict of interest.! 16/07/2004 Cork Examiner.

Liabile actions

- Liability for health impacts from incinerators is complex and can fall on multiple parties, including the incinerator's **owner/operator** for non-compliance or negligence, and government agencies like the **Environmental Protection Agency (EPA), etc** which are responsible for setting and enforcing regulations. If an incinerator's emissions cause harm, the owner/operator could face legal liability, especially if they are not in compliance with their permits or if there is gross negligence. As emissions can spread an estimated 40mile radius, that's a considerable population. I am not a legal expert but we are setting ourselves up for a lifetime of litigation if this planning is granted.

Tourism

- Cork Harbour has already undergone a €64million cleanup from pollution as a result of Irish Steel, transforming it into a place of beauty and economic value
- The proposed location of this development on the Harbour edge of one the largest natural Harbours in the world which mean when fully operational this structure will be continuously emitting smoke. With prevailing winds this smoke will be swept over to our historic town of Cobh with x residents and visitng cruise ships per anum. The Port of Cork welcomed **103 cruise ships** to Cobh in 2024, carrying over 190,000 passengers. This development would **significantly** impact the tourist industry in this area as proposed by Bord Failte 5 year development plan Nov 2025.
- "The Cork City, Harbour and East Cork Development Plan has been developed through a collaborative approach and will be dependent on local tourism businesses, stakeholders and local communities working with Fáilte Ireland to implement this plan over next five years."

- In the plan The Cork City, Harbour and East Cork Destination and Experience Development Plan (DEDP) aims to create a **sustainable tourism** destination by extending the tourism season and spreading business across all parts of the region over the next five years.

Key stakeholders in the area were consulted and contributed to the plan including Cork City Council, Cork County Council, Local Tourism Industry, Port of Cork, Cork Airport, Chambers of Commerce, Leader, Local Economic Groups as well as local Communities.

The development of the five-year plan provides a shared vision and clear direction towards improved development, strengthening the promotion of the area's unique features by growing the destination's market share through the delivery of priority projects and hero experiences that seek to maximise the key strengths of the area.

The plan provides the strategic framework to prioritise tourism development projects that will attract more visitors to the region and encourage them to stay longer. This includes the development of a visitor attraction of scale for Cork City and enhancing the harbour's accessibility to create a sustainable visitor amenity that connects communities to the City. It also suggests leveraging the county's rich food provenance to position it as a world-class gastronomy destination.
<https://www.failteireland.ie/>

False Circular economy

- It is true to say that Ireland's existing landfills and incinerators aren't enough to handle the rubbish that its people are creating, the National Waste Management plan for 2024 to 2030. I echo the concerns raised in an article by the Dublin inquirer April 2025 "I would have some concerns that the waste-to-energy incinerator plans really just lock us into kind of unsustainable systems."
- At a recent meeting of Dublin City Council's climate action committee, councillors were briefed on the growing level of waste, and the national waste strategy, by Hugh Coughlan, coordinator for the Eastern-Midlands Regional Waste Management Office.
- Green Party Councillor Donna Cooney said she was surprised there wasn't more of an emphasis on reducing the amount of waste produced and instead focusing on handling the increasing amount better. "I just don't feel the ambition is there," Cooney said. "Because we're just producing more and more waste to burn."The

amount of waste has steadily gone up and up, and the projections show it continuing to rise, Coughlan's presentation to the committee says.

- According to Coughlan's presentation, in 2020, the country produced around 2.75 million tonnes of municipal waste, that is waste from households or businesses. By 2024, it hit around 3.25 million tonnes.

<https://www.dublininquirer.com>

- Despite been requested and As far as I am aware baseline studies (Environmental or Epidemiological) have not been completed in these proposed areas? Infact I have it in good authority that the EPA are not monitoring the air quality in this area for sometime. This should be investigated and if there is BIAS been shown or public safety is being this disregarded all those who are complicit in this will be held accountable.

Safety

- The site poses Public Safety risks in the event of an accident, with a single access road serving Haulbowline Island and UCCs National Maritime College and Beaufort Institute.
- In the event of an accident at the incinerator 15,000 residents on Cobh and Great Island depend on a single hump backed bridge for access.

We do need a solution to waste, but incineration is not the answer.

I believe our efforts, time, resources, brain power would be best served in creating a real Sustainable plan for waste in our county and our country. There is a better way! How many more people and organisations do we need to object. This proposed plan will impact future generations to come. We all have a moral obligation to stop this plan once and for all, otherwise we will be complicit in the any deleterious impacts which have been highlighted.

Kind regards,

Lisa Myers

Additionally, I would like to request an Oral hearing to continue public engagement and participation in this application.