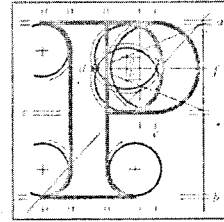


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Marina Ten and Others  
Willows  
Janeville  
Carrigaline  
Co. Cork

**Date:** 24 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,

*Kevin McGettigan*

Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

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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

Name: Marina Ten on behalf of Olga Alp, Zhana Kelleher, Valentina Ivanova, Marguerite Dorgan  
and Daniel Dunne

E-MAIL : mmtanova@gmail.com

Address : 14 The  
Willows, Janeville,  
Carrigaline, Co. Cork.

#### OBSERVATION DETAILS

We enclose fee of €50

Incinerators emit Greenhouse Gasses. The target GHG reduction for 2030 is 55% , 90% by 2040 ,  
and climate neutrality by 2055 based on 1990 levels. The 55% reduction is legally binding per  
EU Law on Climate Action . Building incinerators is completely incompatible with these  
mandates.

Incinerators don't destroy the PFAS compounds completely, since the chemicals have been  
designed to resist burning. Any waste material entering the incinerators will contain a  
number of the 15,000+ PFAS compounds. The definition of PFAS is expanding, and likely to  
include any compound with the C-F bond. PFAS compounds are known to be harmful to  
humans at high concentrations or with persistent exposure.

A study of persistent organic pollutants (POPs) at Zubieta in 2024 showed elevated levels of  
PFAS, Dioxanes and heavy metals around the Zubieta Waste-to-Energy Incinerator. In some  
cases more than 10 times the EU legal limit for Dioxane. The level of Dioxane in moss was 300  
times higher than baseline levels before the incinerator began operating in 2020 (  
Zerowasteurope.eu).

Another study from Harlingen (Netherlands) showed that PFAS levels were found to be 138  
times the Dutch legal limit , and comparable with the contamination typically found near major  
fluorochemical plants, despite no such industry operating nearby. Likewise the Dioxane levels  
in soil have increased seven fold since 2013 (Zerowasteurope.eu)

The incineration of PFAS (Per – and Poly – fluorinated alkyl substances) thermodynamic models indicate that the reaction enthalpy or fluorosurfactant solutions are dependent on water content, and incomplete combustion at low temperatures can result in the release of high global warming waste products (Kovacs, Higgins, Ionesco, Cho 2025).

Additionally, the long chain PFAS are broken down (but not destroyed) by incineration (Yamada et al 2005).

Incinerators of this type typically spread, not breakdown PFAS (Hogue, 2020) ,

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### **“Emission of Perfluoroalkyl Acids and Unidentified Organofluorine from Swedish Municipal Waste Incineration Plants”**

**Source:** *Environmental Science & Technology Letters (ACS)*, 2024

**Summary:**

This study analyzed fly ash, bottom ash, and flue gas condensate from 27 Swedish municipal waste incinerators. It found measurable levels of **13 PFAS compounds** and **unidentified organofluorine**, indicating **incomplete destruction** and potential environmental release.

**Quote:** “Despite few experimental data supporting the efficacy of this technique... PFAS were detected in residuals.”

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### **“PFAS Soil Concentrations Surrounding a Hazardous Waste Incinerator in East Liverpool, Ohio”**

**Source:** *Environmental Science and Pollution Research*, 2023

**Summary:**

This field study measured PFAS levels in soil near a hazardous waste incinerator. Elevated concentrations were found downwind of the facility, suggesting **off-site deposition** of PFAS or byproducts.

**Quote:** “These findings raise concerns about the environmental justice implications of PFAS incineration in vulnerable communities.”

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### **EPA Research Partner Support Story: Evaluating PFAS Emissions from Waste Incineration**

**Source:** U.S. EPA, 2024

**Summary:**

Ongoing EPA research with state partners is investigating whether PFAS are **destroyed or dispersed** during incineration. Early findings suggest **limited understanding** of PFAS fate in

real-world incinerators.

**Quote:** “It is important to understand if [PFAS] are destroyed or merely spread into the environment.”

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### “Incineration May Spread, Not Break Down PFAS”

**Source:** *Chemical & Engineering News (ACS)*, 2020

**Summary:**

Preliminary data from the Norlite incinerator in Cohoes, NY, showed PFAS contamination in nearby soil and water. The article questions the **destruction efficiency** of commercial incinerators.

**Quote:** “New data suggest that commercial incineration of PFAS doesn’t break down these hardy chemicals. Instead, it spreads them.”

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### 5. PFAS Incineration Memo – U.S. Federal Register (2020)

**Source:** Office of Management and Budget (OMB)

**Summary:**

This memo from The Sierra Club and EarthJustice states that PFAS incineration is **not proven safe**, citing the **resilience of C–F bonds**, lack of emissions monitoring, and risks to surrounding communities.

**Quote:** “Commercial incinerators do not, and often cannot, measure their PFAS releases... placing communities at risk.”

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### ⚠ Key Concerns Raised Across Studies

- **Incomplete combustion** of PFAS, especially in mixed waste streams
- **Formation of toxic byproducts** like HF, short-chain PFAS, and ultrafine particles
- **Lack of emissions monitoring** and destruction verification in commercial settings
- **Environmental justice issues** in communities near incinerators
- **Regulatory uncertainty** and absence of standardized destruction efficiency metrics

#### Additional information

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)

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 our 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.

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.

Additionally, the population of the area (Ringaskiddy, Carrigaline, Crosshaven, Cobh, etc.) have grown substantially in the past few years and keeps increasing. Exposing local communities to the most hazardous ashes must not take place (<https://arnika.org/en/news/report-waste-incineration-drives-the-triple-planetary-crisis>)

November 17, 2025

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