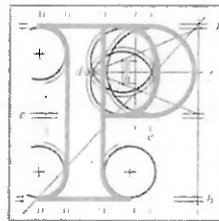


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Nick & Tina Emerson
17 Castlepoint Court
Crosshaven
Cork

P43 H277

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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

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

TO: An Coimisiun Pleanala, 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: NICK & TINA EMERSON

DATE: 9 NOVEMBER 2025

OBSERVER ADDRESS: 17 Castlepoint Court, Crosshaven, Cork P43 H277

OBSERVATION DETAILS

Given the statement on the An Coimisiun Pleanala website -

To play our part as an independent national body in an impartial, efficient and open manner, to ensure that physical development and major infrastructure projects in Ireland respect the principles of sustainable development, including the protection of the environment.

we are outraged that we are required to pay €50 of our pension to object to an application that should have been quashed in its infancy. No doubt the consulting engineers for the project have produced volumes of paperwork giving a myriad reasons about the efficacy and safety of this proposal. We are not academics in this field but one thing is clear, this proposal, if allowed to go ahead, will wreck this beautiful harbour and wreak pollution on all those that live in or around here.

However, our friends tell us musings, no matter how correct, are not what is needed here so we have gathered a few facts from people far better acquainted with this proposal than ourselves.

- 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 Pleanala 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 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.

One thing that time gives us is the chance to expand our knowledge in general, but in this particular case the argument that the so called “forever chemicals” (PFAS) certainly just disappear or are in fact successfully “treated” in an incinerator situation. Some recent findings are listed below which very much counter this argument and given more time the list would probably be far more exhaustive.

Peer-Reviewed Studies & Reports Highlighting PFAS Incineration Risks

1. “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.”

2. “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.”

3. 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."

4. "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."

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

Source: Office of Management and Budget (OMB)

Summary:

This memo from The Sierra Club and Earth Justice 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."

! Key Concerns Raised Across These 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

Now I (Nick) am an avid pool swimmer, an Irish record holder and member of Cork Masters Swimming Club. To supplement our training many of us also swim in the sea so I also belong to Myrtleville Swimmers. We swim in the sea daily all year round from Myrtleville Beach right at the entrance to Cork Harbour. Cork Corporation have paid for a set of buoys to be placed in the water to guide swimmers and from the outermost buoy, I guess we will clearly see the proposed incinerator chimney. I wonder how membership might be reduced if you explain that this leads to the possibility of breathing in these "forever chemicals" or accidentally imbibing those

washed out from the toxic ash before it is shipped off to be dumped on another unsuspecting client.

Every day, in fact every hour, more and more documentation is becoming available to show how bad incineration is from every point of view in the modern world. So, it is time we wrap up our observation, let those more knowledgeable provide a more succinct case and simply state;

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.

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