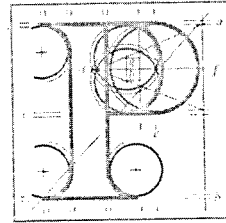


Our Case Number: ABP-318802-24
Planning Authority Reference Number:



An
Coimisiún
Pleanála

Robert Flanagan
Mount Alto
Glasson's Avenue
Cobh
Co. Cork

Date: 25 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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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

Objection to the Proposed Waste Incinerator in Ringaskiddy, Co. Cork, Ireland (No. 318802)

Submitted by: Robert Flanagan

Add: Mount Alto, Glasson's Avenue, Cobh

Contact No. 0852867399

Industrial Combustion Technician

Date: November 17, 2025

To: An Coimisiun Pleanála

Re: Formal Objection to Proposed Waste Incinerator Facility at Ringaskiddy, Co. Cork, Ireland – Application/Reference for site No. 318802

Dear Members of the Commission,

As a combustion technician with over 15 years of experience in thermal waste management systems, including the design, operation, and regulatory compliance of high-temperature incineration facilities, I am writing to lodge a strong objection to the proposed waste incinerator in Ringaskiddy. My expertise encompasses combustion kinetics, emission control technologies, and the thermodynamic inefficiencies inherent in municipal solid waste (MSW) incineration processes. I have worked on clinical waste incinerators in Australia, including assessments of incinerator performance in sensitive ecological zones in dense urban areas. This objection is grounded in technical, environmental, and public health realities that render this project fundamentally unsuitable for an urban or rural setting like Ringaskiddy, where baseline air quality is pristine and agricultural livelihoods depend on uncompromised ecosystems.

1. Inherent Technical Limitations and Inefficiencies of Incineration Technology

From an industrial combustion standpoint, MSW incinerators are outdated and inefficient compared to modern waste diversion strategies. These facilities operate at temperatures typically exceeding 850–1,100°C to achieve complete oxidation, yet even under optimal conditions, they struggle with heterogeneous waste streams—leading to incomplete combustion and the formation of persistent organic pollutants (POPs) such as dioxins and furans. The proposed facility's reliance on grate-firing or fluidized-bed combustion will exacerbate these issues, as rural waste profiles (often including agricultural residues, pharmaceutical and clinical waste) introduce variable moisture and chlorine content, promoting hydrochloric acid (HCl) formation and corrosion in the combustion chamber. This not only shortens equipment lifespan but also increases operational downtime, rendering the plant uneconomical over its 20–30-year lifecycle.

Moreover, incinerators are energy sinks rather than sources: net energy recovery is often below 20–25% due to parasitic loads from pollution controls like selective catalytic reduction (SCR) systems and baghouses. In a rural context, where grid integration is costly and renewable alternatives (depolymerisation or plasma gasification) are more feasible, this technology locks the gasses into a high-carbon pathway, contradicting global decarbonization goals. I urge the Commission to prioritize proven alternatives which achieve higher diversion rates without the thermal inefficiencies of incineration.

2. Unacceptable Environmental and Health Risks in an Urban Setting especially when the prevailing winds blow south to south east putting the adjoining urban towns such as Cobh into the direct path of incinerator emissions. Baseline PM_{2.5} levels here are already low (often <5 µg/m³ annually), but even state-of-the-art controls cannot eliminate the stack release of fine particulate matter (PM_{2.5}), heavy metals (lead, mercury), and ultrafine particles that travel

kilometers downwind. Studies of similar facilities show annual health costs from PM2.5 alone exceeding hundreds of millions in affected communities, including exacerbated respiratory diseases, cardiovascular events, and premature mortality. In urban zones, these pollutants disproportionately impact vulnerable populations, children and the elderly who spend more time outdoors, increasing exposure risks. Epidemiological data further substantiates these concerns: proximity to incinerators correlates with elevated risks of neoplasia (e.g., lung and soft-tissue sarcomas), congenital anomalies, infant mortality, and miscarriages. Rural serum dioxin levels near such facilities have been measured 2–5 times higher than in control populations, persisting for decades due to bioaccumulation in local food chains. For the greater Cork harbour area this means dioxin uptake via contaminated water, rendering the seafood and any produce grown unfit for human consumption. Groundwater risks from fly ash leachate—laden with arsenic and cadmium—are acute in our karst topography, where aquifers recharge rapidly and supply 70% of drinking water. This proposal also embodies environmental injustice: incinerators are disproportionately sited in underserved areas, amplifying inequities for residents who lack the political leverage to block such proposed incinerators. As a combustion technician, I can attest that no emission standard (e.g., EU's 0.1 ng/Nm³ TEQ for dioxins) fully mitigates these multi-pathway exposures in mid-population-density settings.

3. Regulatory and Economic Shortcomings

Current regulations, while stringent, fail to address cumulative impacts in rural microclimates, where inversion layers trap emissions during winter months, spiking local concentrations by 200–300%. Operator training mandates are insufficient for the variability of mixed waste inputs, risking "upset conditions" that spike emissions.

Given the new Ringaskiddy port expansion there's also a major concern for concern that the proposed incinerator will be used to process foreign waste, further increasing the risk of local air, land and sea pollution.

In conclusion, as an Industrial combustion technician committed to sustainable innovation, I assert that this incinerator violates principles of sound engineering practice and endangers the irreplaceable character of Ringaskiddy and the greater Cork City area. I implore the Commission to reject this application outright and instead invest in circular economy solutions that align with our community's values and the urgent imperatives of climate resilience. I am available for testimony or further technical review at your convenience.

Sincerely,
Robert Flanagan