Our Case Number: ABP-318802-24

Planning Authority Reference Number:

An Coimisiún Pleanála

Teresa Stack
5 St Columba's Villas
Laytown
Co. Meath
A92 H7T8

Date: 05 January 2026

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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TO: An Coimisiun Pleanala
64 Marlborough Street
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OBSERVATION ON SID APPLICATION - Case reference: ~~PA04.318802-24~~, Ringaskiddy Co Cork

Proposed development of a resource recovery centre (including waste-to-energy facility) by Indaver NV t/a Indaver Ireland

OBSERVER NAME: **Teresa Stack** **DATE: 17th November, 2025**

OBSERVER ADDRESS: **5 St Columba's Villas, Laytown, Co Meath** **A92 H7T8**

OBSERVATION DETAILS

1. 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).*
2. 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.
3. 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)*
4. 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)

5. 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 especially given the proposed 5-year development plan by Failte Ireland in association with Cork County Council, Cork City Council and the Port of Cork. The proposed incinerator is therefore in direct contravention of the County Development Plan and contrary to the specified objectives for the immediate area.

6. EIAR

   In June 2024 2024 An Coimisium Pleanala required Indaver Ireland "to furnish the following information in relation to the effects on the Environment of the proposed development"- updated EIS (now more correctly an EIAR informed by an EIA under EU and Irish Legislation). According to the EU EIA of 2018 it must assess the direct and indirect significant effects on the project of specified factors. These factors include "population and human health", "land", 'biodiversity', disaster risk prevention and management" etc.

The EIAR itself is materially incomplete. Under Irish and EU law (PDA 2000 s.37G(2)(b) and EIA Directive 2014/52/EU), the Board cannot approve a materially incomplete EIAR.

The following are missing or incomplete:

- Carbon-budget test.
- ETS (carbon-allowance and cost) analysis.
- PFAS assessment.
- Ultrafine-particle (PM0.1) assessment.
- Modern flood-risk assessment (OPW 2022).
- Tourism and socio-economic impact assessment.

- Modern alternatives analysis.
- Required Population and Human Health content.
- Up-to-date baseline data.
- Current waste-policy assessment (Circular Economy Act; 2024–2030 Plan).

The following are present but technically defective:
- R1 efficiency: this is provided but is wrong; the correct value seems to be about 0.597 (which is disposal, not recovery).
- Flood-risk: provided but invalid; uses outdated maps and omits 2022 requirements.
- Plume modelling: provided but incomplete; omits thermal inversions (the plume will sit on the harbour like a pancake), coastal trapping, ultrafines.
- Waste-policy narrative: this is provided but is misleading; it relies on outdated plans.
- "Need" case: provided but contradicted by current national capacity data.
- Energy-benefit claims: provided but misleading; this plant (as in Indaver Meath) will be electricity-only and inconsistent with grid trends.
- Zoning discussion: provided but incomplete.
- Hazardous-waste description: provided but incomplete; no PFAS or combustion-adequacy analysis.

EIAR – disaster risk prevention and management

Indaver Ireland, Ringaskiddy, proposes using only two hours of resources in the event of a fire outbreak.

There have been fires in the following plants between 2017 and 2025:

Poolbeg Incinerator – 11 hospitalized

Indaver Plant, Antwerp – fires in 2016 and 2018

Wupperthal Germany fire

Rotherdam Netherlands Fire

Montbeliard France Fire

Mainz Germany Fire

Indaver Doel Belgium Fire

7. EIAR - Population and Health

Zerowasteeurope.eu in April 2015 issued a Report on a series of studies undertaken in Zubieta, Spain, Harlingen, Netherlands, and Paris, France, undertaken for them by Toxico Watch Foundation.

In every case areas around the Incinerator facilities had widespread and dangerous levels of contamination in soil, water, vegetation and even food which exceeded EU limits by 300 times. The findings reinforce the need for a rapid transition towards non-burn zero waste alternatives to protect public health and the environment.

To quote Janek Yakh, Zero Pollution Manager, at zerowasteeurope, "these results dismantle the myth that waste incineration is a clean or safe solution."

Incineration is an outdated, unsustainable method for waste disposal, as burning waste, especially plastics, produces dangerous air emissions and high amounts of toxic ash - Arnika 3 September 2024

PRAGUE, CZECHIA - A comprehensive new report "Waste incineration and the Environment" released today by Arnika, the Centre for Environment Justice and Development (CEJAD) in Kenya, Centre de Recherche et d'Education pour le Développement (CREPD) in Cameroon, Toxics Free Australia (TFA), and IPEN finds that burning waste, especially plastics, produces unsustainable and unmanageable hazardous air emissions large amounts of highly toxic solid residues (ash), concluding that alternatives to incineration should be implemented globally.

Scientific study by Toxico Watch Foundation pointing to high levels of persistant organic pollutants in food grown near waste incinerator facilities in Europe. Studies were carried out in 5 European Countries, namely Belgium, The Netherlands, Spain, Slovakia and France. Results were similar in each. **Food Safety Magazine 11 April 2024.**

Peer-Reviewed Studies & Reports Highlighting PFAS Incineration Risks

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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."
. "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."
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."
. 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."

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

In addition the WHO and IARC have stated that the health effects of dioxins and heavy metal are cancer, heart defects, respiratory illnesses, immune and hormonal disruption, birth defects and learning difficulties.

The British Society for Ecological Medicine concluded that no new incinerators should be built due to the risk of fine particulates which cannot be captured by chemical filters in chimneys.

While technology is currently available that allows for controlled waste incineration with low dioxin emissions, none captures all harmful emissions like dioxins and furans and PFAS. And there is no safe level of dioxins.

There are new technologies emerging in Asia (Korea and Japan), the US and Europe which render this type of burning of waste obsolete. This proposed incinerator is intended to run for at least 20 years locking us in to obsolete technology burning waste, and interfering with the circular economy and contrary to Irish and EU law.

In the UK, UKWIN issued a health briefing in 2023 stating that air pollution is regarded by the UN as the greatest threat to human health. They stated that dioxins are the most toxic of air pollutants with limits for human intake defined in *picograms*, (a millionth of a millionth of a gram....).

A recent All Party Group on Air Pollution in Scotland concluded that there should be a moratorium on incinerators and raised concerns about how incinerators were regulated.

In 2017 the EC itself advised a moratorium on incineration and advised in favour of waste prevention, re-use, recycle, etc.

Incineration sends one third of its output to hazardous landfill. Indaver Meath exports theirs to partners in Europe.

6. 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, the EIAR is incomplete, the

health hazards are now well established internationally, and the technology is now redundant.

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

☐ I enclose fee of €50 ☒

I have already submitted in ☐ 2016 so have paid prior fee

Teresa Stack

Additional pages attached (no of) X