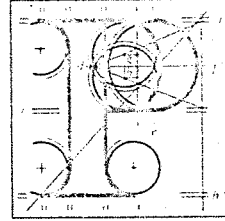


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Voice Ireland  
c/o Tad Kirakowski  
9 Upper Mount Street  
Dublin 2

**Date:** 20 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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64 Marlborough Street  
Dublin 1  
D01 V902

No oral  
Hearing  
request



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 : Tad Kirakowski, CEO, VOICE Ireland

Date :12/11/2025

Observer Address : 9 Upper Mount Street, Dublin 2.

Contact details :

Email : [tad@voiceireland.org](mailto:tad@voiceireland.org)

Phone: +353 (0)1 6425741

**VOICE object to the construction of the proposed incinerator at Ringaskiddy as it is contrary to the policy shift in Ireland and in the EU towards protecting and conserving valuable secondary raw materials and away from the current linear economic model of extraction, consumption and disposal of goods. Incineration, or 'waste to energy' is old technology that will lock us into this linear model for the next 25+ years, moving us away from our goal of circularity. There are other more modular technologies, such as Material Recovery and Biological Treatment (MRBT) that will treat residual waste more effectively to extract as much value as possible from the waste and stabilise the waste before disposal.<sup>1</sup>**

**Observation.**

The proposed development is not aligned with national policy on circular economy, or the national development plan as regards waste.

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<sup>1</sup> [The road to circular: Material Recovery and Biological Treatment](#)

The existing National Waste Management Plan for a Circular Economy (NWMPE),<sup>2</sup> sets Protection of the Environment as Core Policy 1. Targeted Policy 11 states that the development or enhancement of infrastructure and initiatives must be subject to the application of the waste hierarchy. The plan also sets out targets for increased waste segregation for recycling and food waste recovery. National projects should prioritise waste prevention and waste segregation over incineration, for instance investment in reuse centres, recycling, and anaerobic digestion as alternative methods of waste management. The National Planning framework 2040, under policy objective 53 and 53 commits to supporting the circular and bioeconomy as well as greenhouse gas emissions reductions, noting that “The Circular Economy Package indicates that in a circular economy, a cascading use of renewable resources should be encouraged”<sup>3</sup>. The national development plan “This [circular economy] policy is set out in the government’s Waste Action Plan for a Circular Economy, and will be further elaborated upon in the forthcoming Whole of-Government Circular Economy Strategy. The Strategy aims to position Ireland as an EU leader in the Circular Economy by 2030” noting that in a circular economy “resources are kept in use for as long as possible, the maximum value is extracted from them and then, at the end of their life cycle, they are recovered to regenerate new products and materials”<sup>4</sup>

As such the proposed incinerator is not the optimal or even necessary step in furtherance of the circular economy, or the National Development Plan with respect to waste treatment. Cork County Council also supports the development of waste infrastructure in line with Waste Action plan for a circular economy 2020-2025. Objective BE15-14 b) is to “Support circular and climate resilient economy principles and associated strategic infrastructure, prioritising prevention, reuse, recycling and recovery, and to sustainably manage all types of waste by ensuring the provision of adequate waste recovery, recycling and disposal facilities for the county”<sup>5</sup>. “The application rightly points out that Ireland relies on export of waste, of approx. 1.2 million tonnes, about 38% of our waste. However, within the EU, studies show that as a European community we are already over capacity in incineration by approx. 60-million tonnes in 2020<sup>6</sup>. The current proposed development would exacerbate this over supply of incineration and develop further ‘asset lock in’ across Europe as whole, impacting on the EU green deal and circular economy strategies.

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<sup>2</sup> [National-Waste-Management-Plan-for-a-Circular-Economy-Volume-II-Policy-Responses-and-Actions.pdf](#)

<sup>3</sup> <https://assets.gov.ie/static/documents/project-2040-national-planning-framework-841f7a87-133c-4d9a-9ec7-d1d3da634105.pdf>

<sup>4</sup> <https://assets.gov.ie/static/documents/national-development-plan-2021-2030.pdf>

<sup>5</sup> <https://www.corkcoco.ie/sites/default/files/-06/volume-1-main-policy-material.pdf>

<sup>6</sup> <https://zerowasteurope.eu/library/enough-is-enough-the-case-for-a-moratorium-on-incineration/>

## The proposed development fails to take into account changes in waste segregation and EU recycling and biowaste targets

The national roll out of the 3-bin system in 2023 will increase the collection of organic waste, which makes up 60% of commercial Municipal Solid Waste (MSW) and 14% of household MSW, and remove it from the MSW waste stream. Under the EU Waste Framework Directive, Ireland will have to achieve national recycling targets of 55% by 2025 which would result in the diversion of 400,000 tonnes of material from waste incineration and landfilling.

Additionally, the NWMPCE sets out a clear target of 0% growth in waste per person by 2030. The development of incineration technologies at this stage would undermine the national circular economy ambitions by supporting incineration over waste segregation and the further development of recycling and composting facilities.

## The proposed development documentation does not adequately account for the health impact of the emissions to air on the environment, communities and wildlife surrounding.

The existing NIS states that there is no impact from the site in operation on the existing Cork Harbour SAC, however studies have shown the accumulation of POPs, PFAS and metals in the environment up to 5km radius from similar incineration plants. For example, biomonitoring at a plant of a similar scale and incineration process in Spain has shown: "exceedances of dioxins, perfluoroalkyl substances (PFAS), and heavy metals in the environment" and detected PFAS in drinking water that had previously been considered pristine<sup>7</sup>. The study showed the existence of Dioxins and PFAS in mosses and chicken eggs, up to 5km away from the site. Studies have shown similar impacts at sites in the Netherlands<sup>8</sup> where PFAs in water samples contained 610 ng PFOA eq. /l, exceeding the Dutch drinking water limit of 4.4 ng PFOA eq./l by a factor of 138. While biomonitoring in Paris<sup>9</sup> measured PFAS from air filters of schools within 1.7km of the site – it is worth noting the Ringaskiddy National School is within 2km.

The NIS does note on page 55 that "Impacts on the Cork Harbour SPA as a result of air emissions and bioaccumulation, although unlikely, could potentially occur." We believe that the likelihood of this occurrence is significant, as shown through bioaccumulation studies elsewhere, and will have a significant effect on the SPA, community as well as amenity users in the area. The proposed development and attached documentation do

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<sup>7</sup> [https://zerowasteurope.eu/wp-content/uploads/2023/04/ZWE\\_TW\\_Annex1\\_April25\\_The-True-Toxic-Toll-Biomonitoring-research-Zubieta-Spain.pdf](https://zerowasteurope.eu/wp-content/uploads/2023/04/ZWE_TW_Annex1_April25_The-True-Toxic-Toll-Biomonitoring-research-Zubieta-Spain.pdf)

<sup>8</sup> <https://toxicowatch.org/biomonitoring-projects/#1546>

<sup>9</sup> <https://toxicowatch.org/biomonitoring-projects/#1570>

not adequately take into account “impacts of emissions generated by the new industrial development on the SPA and its qualifying species;” as stated under the local development plan target objectives RY-GO-02 or Ry-GO-09 on cumulative impacts on air quality<sup>10</sup>. The accumulation of dioxins and PFAS in chicken eggshells is also notable in the context of the water birds nesting in the area, which must be taken into account when considering new development proposals under RY-I-11 “Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area”<sup>11</sup>

### The management plan for the bottom, boiler and fly ash is vague

The Indaver application is very vague about where the resulting ash will go as they stated that it might be used on roads or disposed in salt caves or exported abroad. It is very important to know where this ash will go as it could contaminate local environs when it is heaped uncovered or transported by truck or ship. Often times, the on-loading or off-loading of ash onto trucks and ships is done in the open, with ash entering water bodies and ground sources. As the proposed facility is right next to the water, can they guarantee that ash will not enter local waters? In the Netherlands, ash spilled into the Wadden Sea, a UNESCO site, where test samples “showed elevated oestrogenic activity (stimulated changes in female reproductive organs during the oestrous cycle), expressed as estradiol equivalent in the Era CALUX10, of water near the transshipping place. This research therefore demonstrates a significant threat not only to the (UNESCO) World Heritage marine site but local fishermen too have testified abdominal growths on fish such as pouting (*Trisopterus luscus*), the European flounder (*Platichthys flesus*) and growths on the mouths of certain species of European eel (*Anguilla anguilla*), caught in the Harbour near this bottom ash loading location.”<sup>12</sup>. The European eel is classified as critically endangered, and is recorded within the Cork Harbour catchment area<sup>13</sup>

### The proposed development is not in line with climate ambitions

As outlined above the national development plan and planning framework both support the transition to a circular economy. Development of incineration capacity in Ireland, and particularly across Europe as a whole, is detrimental to this national strategic ambition. . While the inclusion of incineration as part of the EU ETS is under consideration in 2028, the energy generated through incineration would therefore be less favourable than energy

<sup>10</sup> <https://www.corkcoco.ie/sites/default/files/2022-06/volume-4-south-cork.pdf> p62

<sup>11</sup> <https://www.corkcoco.ie/sites/default/files/2022-06/volume-4-south-cork.pdf> p 64

<sup>12</sup> [zero\\_waste\\_europe\\_cs\\_the-hidden-impacts-of-incineration-residues\\_en-1.pdf](#)

<sup>13</sup> <https://maps.biodiversityireland.ie/Dataset/174/Species/13627>

generated through true renewable alternatives<sup>14</sup>, and will drive away efforts for further segregation for recycling and reuse. As stated in the Indaver application, only a portion of the energy produced by the plant will be considered 'renewable'.<sup>15</sup>

Approving the construction of this incinerator will lock Cork and Ireland into an outdated linear waste management treatment process and contradict Ireland's desire to move up the waste hierarchy towards prevention, reduction and recycling and fully embracing the circular economy.

## Conclusion

In light of the foregoing, we respectfully submit that the proposed development is inconsistent with national and EU policy objectives for a circular economy, undermines Ireland's waste prevention and recycling targets, and poses significant environmental and public health risks. Approving this SID application would lock the region into an outdated, linear waste treatment model for decades, contrary to the principles set out in the National Waste Management Plan and the National Development Plan. We urge An Bord Pleanála to reject this proposal and instead support infrastructure that prioritises prevention, reuse, recycling, and sustainable resource recovery in line with Ireland's climate and circular economy commitments.

Kind regards,



Tad Kirakowski

CEO, VOICE Ireland.

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<sup>14</sup> <https://carbonmarketwatch.org/publications/waste-no-time-expanding-the-eu-ets-to-cover-waste-incinerators-and-landfills/>

<sup>15</sup> [Non-Technical Summary\\_Issue 2025.pdf](#) p. 1