

Record of findings of  
the Ringsend CIG  
prepared by  
Mercator Marketing Research  
on behalf of  
Ringsend CIG  
October 2002  
(Final Draft)

## Contents

Introduction	4
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### **Part One**

Background to Dublin Waste Management Plan	6
The Ringsend Community Interest Group	10
• Recruiting CIG Members	10
• The CIG Remit	12
• Meetings and Resignations	13
Public Consultation	14
Proposed Outcomes of the CIG Process	16
Feeding into Scoping	17
CIG Meetings	20
The CIG Process - Some Important Issues	22
• A PR exercise?	22
• Community Misinterpretation	23
• Group Dynamics	25
• Information and Deadlines	26
Site Visits	29
Experts and Resources	31

## **Part Two**

Gathering Information	34
Siting and Proposed Technology	35
• The 'Preferred' Site	35
• The Need for Thermal Treatment	38
The Scale of Proposed Thermal Treatment Plant	41
Health	44
Traffic	46
The Environment	47
Regulation	49
The Views of the Experts	50
• Dr. Jim Wilson	50
• Karin Dubsky	51
• Professor Yvonne Scannell	52
• Conor Skehan	53
• Martin Hederman-Robinson	54
• Frank McDonald	55
• Dr. Hendrik Van der Kamp	56
• Dr. Dieter Schrenk	57
• Dr. Paul Johnston	58
• Dr. Andrew Farmer	59
• Owen Madden & Donal Mathews	60
• Dennis Fitzgerald	61
Summary and Conclusions	62
<i>Appendix One</i>	66
<i>Appendix Two</i>	67
<i>Appendix Three</i>	71

## Introduction

This document is a record of the findings of a Community Interest Group (CIG) set up in the Ringsend, Irishtown and Sandymount area in order to discuss plans for, and uncover information regarding, a thermal treatment plant on the Poolbeg Peninsula.

It was decided by CIG that this record should be compiled by an independent researcher, in order to best collate and compile the available information in a way that would be relevant and meaningful to the group themselves, and to the wider community in the areas mentioned.

The information contained within this document was gathered by means of speaking to members of the CIG, either in group discussions, or on an individual basis. Transcripts of previous CIG meetings were also available, as was other information concerning the CIG process and the planning stages for a thermal treatment plant at Poolbeg.

There are two parts to this document, reflecting the different attitudes to the issues that were uncovered in the course of conversations with the group. The first section details the CIG process itself, and reactions from within the group to the way this process progressed over a period of months. The second section details the issues of importance that were identified by some CIG members when considering the impact a thermal treatment plant would have on the Ringsend, Irishtown and Sandymount area. However, the preference expressed by most members of the group is that these concerns be spoken of only in very general terms, to avoid the risk of feeding into a scoping document.

There are concerns over the best way, if any, to present this information to a wider audience, which will be detailed at a subsequent stage in this document. The two-section structure serves as a means of facilitating the different views that are contained within the CIG, and of recording these views, even if the group ultimately decide that they do not wish this document to be used in its entirety.

## Part One

## Background to Dublin Regional Waste Management Plan

This brief and introductory summary presents the perspective on Dublin Waste Management issues held by Dublin City Council and Engineering Consultants, M.C. O'Sullivan. As will become clear in subsequent sections of the report, the Community Interest Group (CIG) have a number of objections to various aspects of the Dublin Waste Management Plan, but the overall intention of Dublin City Council and M.C. O'Sullivan is presented here in order to supply some background information for those who were not able to be part of the CIG process.

In 1998 Dublin City Council passed the Dublin Waste Management Plan, which detailed future plans for dealing with Dublin's waste, of which household waste constitutes only 15% of the total. As of 1998 almost 90% of Dublin's waste is disposed of in landfill sites, with only 10% of the waste being properly recycled. EU directives have been put in place which require the amount of waste sent to landfill in member states to be reduced - particularly biodegradable waste. The EU directives also require future landfill sites to be more carefully regulated than is currently the case.

One of the primary objectives of the Dublin Waste Management Plan is to address this issue by ensuring that in future 60% of Dublin's waste will be recycled (which includes a large proportion of construction waste as well as ordinary municipal waste), 25% will be dealt with in such a manner as to recover energy from the waste, and only the remaining 15% will be disposed of in landfill. It is the 25% segment of the waste, proposed for a waste to energy process, that is the main concern of this document. These figures come from the Waste Management Plan itself, as drawn up by Dublin City Council, and it should be noted at this point that the CIG have reservations as to whether these are credible or helpful statistics to use. The CIG also believe that the implementation of the Plan in its current form will mean that ordinary householders will be required to subsidise the costs of having commercial waste dealt with. The waste being spoken of will be derived from the entire Dublin region, from Dun Laoghaire and Rathdown County Council, Fingal County Council, South Dublin County Council and Dublin City Council.

Dublin City Council and M.C. O'Sullivan claim that *in order to dispose of 25% of Dublin's waste in such a way as to obtain energy from the process, a different form of waste treatment*

*needs to be introduced in the Dublin region. The best way of managing the waste to energy process, as identified by these parties, is to install some kind of thermal treatment plant in the Dublin area. This will allow the waste to be disposed of through incineration, but a by-product of this disposal process will be energy which can then be used for a variety of other purposes.* Other by-products include residual bottom ash (approximately 25% by weight of the original waste), and the more toxic fly ash (approximately 5% by weight of the original waste), and air emissions. The fly ash contains high levels of dioxins, which are highly toxic. The CIG would like it to be made clear that they do not accept that this is in fact a viable waste to energy process, as the amount of energy produced is very low. They consider it instead to be a mass-burn incineration process.

The Dublin Regional Waste Management Plan is open to be reviewed in December 2002, and there is a possibility that some amendments can be made arising out of such a review.

According to Dublin City Council, a siting and feasibility study was conducted in 1999, in order to discover the best technique to adopt for the waste to energy project, and to discover a preferred site for this waste treatment process to take place in. Four sites were identified as having the potential to encompass a waste to energy plant, and out of this study, the Poolbeg Peninsula was identified as being the preferred site.

Before a thermal treatment plant can be constructed on the Poolbeg site, however, there is a formal and legal planning stage to be gone through. During this stage, Environmental Impact Assessments (EIA) must be carried out in order to examine the impact such a plant will have on the surrounding area. If the impact is considered to be overly detrimental to the area, it may be that the site ceases to be considered as a preferred site, and permission to proceed may be withheld on this account.

A formal application for planning permission to build a thermal treatment plant must also be presented, as must a formal application for a waste license. During this stage of the process therefore - the statutory stage - there are a number of opportunities for people to legally object to the construction or operation of a thermal treatment plant in the Ringsend area. A summary of the statutory process and the possibilities for public involvement follows.

There are four separate legal applications that need to be successful before the way is clear for construction of a waste to energy facility to proceed. All of these applications will be processed in 2004, but more exact timescales are not available as yet. The following stages have been identified by Dublin City Council;

- 1.Planning permission is required from An Bord Pleanala. As part of the application for this planning permission an EIS must be prepared. Local authorities must inform the public that the EIS is being prepared, and members of the public have at least six weeks, and possibly more, to view the EIS and make submissions on it. An Bord Pleanala then reviews the situation, and can either decide to grant planning permission, or can convene an oral hearing at which all interested parties can make their views known, with particular reference to planning concerns such as traffic and infrastructure.
- 2.A developer must apply to the Environmental Protection Agency (EPA) for an Intergrated Pollution Control License. This application will require the developer to set out the details of emissions, discharges, controls, and operational conditions. He may also be required to apply for a Waste License from the EPA. The application must be accompanied by an EIS, and here again the public are free to make submissions. The EPA can also decide to convene an oral hearing for this stage of the process, at which the public can also present their views, especially relating to pollution or environmental concerns.
- 3.The developer will also need to apply to the ESB for a license to generate electricity as part of the waste to energy process. Once again an EIS is required for this application, and the public will be able to make submissions. This license will only be sought once planning and waste license applications have been successful.
- 4.When land is placed under compulsory purchase order an oral hearing is convened for affected parties to make submissions. An Bord Pleanala cannot confirm the CPO until this oral hearing takes place, and objections or submissions of the directly affected parties - ie. the landowners - have been recorded and investigated. Also, in order to CPO land an EIS is sometimes required, and it has been confirmed that this will be necessary in the case of land that is placed under compulsory purchase order for the waste to energy facility at Poolbeg.

While the CPO is already underway, the remainder of the statutory, or legal, phase does not commence until the winter of 2003/2004. Prior to this we are in a non-statutory, or voluntary

stage. During this period, Dublin City Council - the local authority in charge of the project - are asking various companies to tender for the contract to build and operate a thermal treatment plant at Poolbeg. At the same time, they have given a group of independent volunteers a chance to discuss issues surrounding a thermal treatment plant, and to gather information that may help to prepare people for the statutory phase of the project further down the road. This group is the Community Interest Group (CIG) for the Ringsend, Irishtown and Sandymount areas.

This is the first time in Europe that a community interest group has been involved in this kind of project at such an early stage, and Dublin City Council are anxious to learn from this experience for any future projects. In the normal course of events, feedback from members of a community is not invited until the statutory stage of planning as outlined above, whereas the CIG have been involved much earlier on in the process. The intention of Dublin City Council is that the findings of the CIG might be used to inform a developer of local concerns, so that a developer can take these issues into account when preparing a planning application at a later stage.

## The Ringsend Community Interest Group

### *Recruiting CIG members:*

Dublin City Council have convened a group of individual, voluntary members from the Ringsend and Sandymount area, and from other parts of Dublin, in order to discuss plans for a thermal treatment facility on the Poolbeg Peninsula. The principal aim of this process was to allow the group to gather information about thermal treatment, and about the impact a thermal treatment plant would have on the Ringsend, Irishtown and Sandymount areas. This information would then be fed back to the wider community, so that as many people as possible would have some knowledge about what was planned for their area, and how it might affect their lives. This in turn would help people to prepare for the statutory phase of the project outlined above, during which they could present legal objections to the proposed plant, if deemed necessary.

A public meeting was held at the Clanna Gael Fontenoy GAA club in 2001, informing attendees of what was planned for the Poolbeg Peninsula with regard to a thermal treatment plant. Application forms were distributed at this meeting, so that people could fill in these forms if they were interested in participating in a Community Interest Group to discuss the matter further. In addition to this, leaflet drops were done to some homes in the area inviting people to put their names forward for participation.

48 people returned these forms expressing an interest in participating in the CIG process. A selection committee was set up to identify a smaller group from this list of volunteers. The members of this selection committee were a local Garda officer, a local school principal, and Dr. Jim Wilson of Trinity College Dublin, whose area of expertise is Dublin Bay.

Efforts were made to select people who might have experience or expertise to offer in a variety of different areas, so that the group might have as wide a mix of participants as possible. Some were selected because of a background in the health services, since it was presumed that health would be an important issue that would arise for discussion. Some people were selected because they had a background in, or knowledge of, environmental issues, planning issues, or engineering issues. Others were selected because of their

participation in various community enterprises such as youth groups, sports clubs or residents' groups.

It must be stressed at this point however, that no one on the CIG committee was selected in order to represent a particular group or club within the community. It was simply thought that experience in some of the areas outlined above might be useful when it came to uncovering information on different aspects of thermal treatment or its impact on the area.

Members of CIG are individuals drawn from within the community, but they do not represent the community. They may be well placed to discuss or understand some of the issues that are of importance within the area, but have never claimed or wanted to be considered representatives of any group or segment of the Ringsend, or any other, community. Each member has served on the CIG committee as an individual, and any views expressed are individual views and opinions, and should not be taken as indicative of the views of any wider group or association.

In all, 18 people were invited to participate in the CIG process, with this number being considered the largest number that could work well together, but which also allowed different areas of experience to be included. Once this final group of people had been formed, the independent selection committee played no further role in the process.

*The CIG Remit:*

Specific terms of reference for the CIG were defined at the beginning of the process, outlining the role of the group. These terms of reference can be summarised as follows:

The role of the CIG is;

- To identify issues of concern regarding the proposal to build a Waste to Energy facility on the Poolbeg Peninsula
- To assess the work that has been carried out by Dublin Corporation to determine the need for such a facility, and the action that has been taken to identify an appropriate site for such a facility
- To discuss (with the help of experts who support or oppose the use of energy from waste as part of an integrated waste management strategy) the impact of similar facilities on local communities and on the health and safety of humans and the environment
- To indicate the questions that would need to be addressed in the Environmental Impact Statement to respond to areas of community concern
- To prepare a report on the Community Interest Group process for dissemination to the community and interested stakeholders

### *Meetings and Resignations:*

At the outset it was anticipated that the CIG would meet five times between October 2001 and February 2002. The first meeting was held on 9th October 2001 in the Ringsend Community Centre. However, the number of official meetings was extended to seven, and the CIG have also had a number of unofficial meetings themselves, thus extending the process to October 2002. It is estimated that the group has met between 20 and 30 times all told. This was deemed necessary because of the sheer weight of information involved in the process, and also due to requests for legal information on some areas. This will be discussed in greater detail at a later stage in this document.

As the process lengthened, a number of CIG members felt that they no longer wished to be involved for various reasons, and offered their resignation. In May 2002 the group were asked to consider whether they would like to ask new members to join the process in order to keep as close as possible to the original number of participants. One person availed of this opportunity. As of October 2002, therefore, there are 14 people still involved in the CIG process.

However, within this number there is a smaller core group of members who have attended most of the meetings and who have been most heavily involved in all aspects of the process. Others have attended fewer meetings, largely as a result of the extension of the project, which is seen by some as demanding too much in terms of time and commitment.

## Public Consultation

It should be made very clear at the outset that the CIG members have grave reservations about this process being referred to as any kind of public consultation.

There are considerable fears that the authorities will treat this exercise as fulfilling their requirements to consult the public before granting a contract to develop and operate a thermal treatment plant on the Poolbeg Peninsula. The CIG would like it to be made clear that such an approach would be flawed and misleading.

In the first place, the number of people that have been involved in the CIG process is too small for the members to consider it proper consultation. While Dublin City Council or M.C. O'Sullivan may feel that they have consulted members of the public by means of this process, the group's feeling is that it cannot be called proper public consultation when it is conducted on such a small scale.

In addition to this, the members of the CIG do not represent anyone else in the community except themselves. Dublin City Council therefore cannot say that they consulted representatives of a larger group, when everyone who has participated in the CIG process is adamant that they have done so on an individual basis only.

Finally, even leaving this points aside, members of the group are very clear that very little in the way of consultation actually went on in the course of CIG sessions. Instead, they were provided with an overload of technical information, and a series of complicated briefings, rather than a proper opportunity to debate the issues and offer meaningful feedback.

The CIG members would also like the wider community to be aware of what they feel were the flaws in the very first stages of research conducted in the community, which might be classified by the authorities as a form of consultation. In this early phase members of the public in the Ringsend and Irishtown areas were invited to participate in a door-to-door survey in which they were asked would they have a preference for a landfill site or a thermal treatment plant in their area. The CIG feel this was a very misleading approach, as it failed to inform the public of other waste disposal options, such as recycling, or waste reduction, and it failed to ask for their opinions on these options. The results of this survey should not be taken

to represent the definitive response of the community therefore, and Dublin City Council or M.C. O’Sullivan should not be able to claim at any stage that they completed full public consultation.

## Proposed outcomes of the CIG Process

As mentioned above, the CIG committee was convened in order to gather information about thermal treatment in the Ringsend and surrounding areas, so that this information could be brought back to the wider community. The specific terms of reference are guidelines as to how this aim might be achieved. There are other proposed outcomes from the CIG process however.

If the CIG collects information that is used to inform the wider community, this will mean that the knowledge and experience they have gathered can be shared with community members who were not able to be part of this stage of the process. This will also mean that if local residents decide to lodge formal and legal objections to the planning and building of a thermal treatment plant in their area, they will be as well prepared as possible as a result of the CIG process.

Another proposed outcome of this process is that all the concerns of those who are members of CIG could be highlighted in the form of a scoping document for the attention of any developers who are tendering for the contract to build and operate a thermal treatment plant in Ringsend, and for the attention of the future EIA. This means that CIG has the opportunity to directly influence how the EIA is carried out, and to ensure that local concerns are properly addressed in the course of this survey. As is shown below, the CIG members have very strong views regarding this proposed outcome.

## Feeding into Scoping

Prior to the formal Environmental Impact Assessment which is scheduled for 2004/2005, a preparatory document is to be drawn up, which is called the Scoping Document. This document identifies in broad terms the areas which an EIA should make sure to cover when assessing the effects a thermal treatment plant will have on the area. Everything that a scoping document contains must be properly addressed in the EIA or a developer will have failed to present a complete and proper plan, and can have his planning application declined on this account.

For this reason it was suggested that CIG might like to use the information they have gathered as part of this process in order to make sure that the scoping document contains all the areas and issues they have identified as being of concern to themselves. Since the CIG have worked very hard, and have uncovered a great number of issues requiring further attention, this would mean that the EIA would have to be extremely thorough in order to provide answers for all these questions and concerns, and that possibly it would fail to fully establish Poolbeg as the most suitable site for a thermal treatment plant.

There are a number of different opinions surrounding this issue, and some of these views have a bearing on the way in which the CIG committee has functioned. Dublin City Council and others believe that it is very important that CIG make the most of this opportunity to help inform the scoping document, as it is a way of 'marking the developer's card'. While this stage of the process is purely voluntary, by taking the opportunity to feed into the statutory stage, CIG are completing valuable preparation for any legal objections they wish to make in the future. Dublin City Council would also see this as a way in which the CIG could ensure that if an incinerator does go ahead in their area, that it will be of the highest possible standards, as a result of all the questions raised by the group members.

There are a large number of members of the CIG committee who feel very strongly that this is not the way they wish to proceed. They are happy to compile a report detailing the process they have been involved in to date, and for this to be used to inform the wider community. However, there are substantial fears that by announcing areas that they wish to see addressed in an EIA this far in advance, they will actually be 'showing their cards', and even facilitating a developer. It may give a developer a chance to prepare ways of answering public concerns,

so that the EIA would not uncover any unduly negative impacts, thus allowing the development to proceed unhindered.

There is a worry therefore, that by outlining issues of importance for the area, such as traffic or health concerns, that CIG would in fact be ‘feeding’ into the scoping document, which many people are very wary of doing. There are even fears that the CIG report itself, although separate, will eventually be used to feed into a scoping document, and for this reason some members do not wish any issues surrounding thermal treatment itself to be covered in this report.

A related, but separate issue is the way in which some people believe that by feeding into the scoping document, CIG are actually doing a developer’s homework for them. Some members of the group believe that anyone who tenders for the development contract of a thermal treatment plant should be professional enough and expert enough to know what areas an EIA should target anyway. They should not need the help of local individuals, and there is some considerable resentment that CIG are being asked to perform such a task, which they do not believe should form part of their remit.

Another body of opinion within the group holds that it is not a problem to provide information for a scoping document. These members of CIG believe that it is important for as many people as possible to be made aware of the possible effects of a thermal treatment plant being built and operating in their area. These people are anxious to make sure the issues are made known, and they do not believe that it helps a developer in any way. As one person put it, “how can you help them if you’re against it [thermal treatment plant]?” These people believe that being against the siting of a thermal treatment plant at Poolbeg is enough to counteract any perceived dangers of feeding into a scoping document. They can ensure that all the areas of concern are properly targeted in an EIA, at the same time as presenting as much information as possible to the wider public.

There were worries expressed that a failure on the part of CIG to issue a report that can be used for scoping and which details the concerns surrounding thermal treatment and its impact on the area, will lead developers and Dublin City Council officials to the mistaken belief that there must be no such concerns.

Some members of CIG believe that if they miss this opportunity to present their concerns, and the issues they would like to see addressed, that they might not have another opportunity, and that the construction of a thermal treatment plant might continue unopposed. There is very little clarity as to whether this is in fact the case or not, with some people believing that participation in this process means they are ruled out from making future objections, and others feeling the opposite. Attempts on the part of Dublin City Council to establish a clear position in this regard do not seem to have been successful.

In short, members of CIG would like it to be made clear that their participation in this process, and the production of a report, should not be used as a means of assisting the development of a thermal treatment plant in their area. Membership of the group should not be taken, either by Dublin City Council, or by Ringsend residents, to suggest that the CIG individuals are in favour of incineration. Nor should participation in the process prevent the CIG members from objecting to the proposed incinerator at another stage - either as a group, or on an individual basis.

## CIG Meetings

The CIG committee began meeting in October 2001. Each of the meetings was open to the public, and observers were welcome. The intention was that observers would not participate in the main body of the meeting, and that the floor would be opened to them towards the end of each meeting for comments and questions.

Members of Dublin City Council and of M.C. O'Sullivan were also present at these meetings, and each meeting was chaired by a facilitator who was provided by the project team. The CIG committee, however, felt the need for extra meetings among themselves in order to discuss possible directions for the group to take, and Dublin City Council or M.C. O'Sullivan were not at these extra sessions. At no stage however, did CIG wish these meetings to be considered 'closed'. They were simply an opportunity to meet independently, and the public were always welcome to attend.

One of the problems identified by CIG was that public attendance at any of their meetings was very poor. This was attributed to a lack of publicity on the subject. It was felt that meetings were not advertised in advance, and that there was very little public knowledge about what was going on. Extra resources to publicise CIG meetings would have been appreciated. As it is, the lack of public attendance has meant that the motives of CIG members have been misinterpreted on occasion, and that the public have not arrived at a full understanding of what the process has been about. The dissemination of this document is intended in some part to address this problem.

It was also hoped that various local representatives, councillors and TDs would attend the CIG meetings, as their presence and assistance would have been greatly beneficial to the CIG members. However, the group feel that these people were never properly notified about the meetings, and never properly invited to them, and as a result they very rarely turned up in the numbers that they should have. This meant that the CIG felt a lack of support, and they believe that Dublin City Council should have been more diligent in notifying councillors and politicians about the meetings.

When some city councillors were able to attend, often having heard about the meetings by accident, the CIG felt that there was a sense of division between these councillors and other

members of Dublin City Council, especially the City Manager and his Assistant Manager. On many occasions councillors addressed the meetings in order to claim that they had a different understanding of circumstances surrounding the implementation of the Waste Treatment Plan to the City Manager, leaving CIG members confused as to where the truth lay. There were complaints that in fact councillors used the CIG meetings as an opportunity to score points off one another or the City Manager, and as such were of little use to the group.

## The CIG Process - Some Important Issues

Throughout the compilation of this document, a number of issues arose that pointed to a feeling of frustration and helplessness on the part of the CIG members. It is important to detail some of the reasons for this frustration at this point.

### *A PR Exercise?*

There is a strong feeling within the CIG, articulated by a number of people, that this process is simply a public relations exercise. This view is fostered by some of the contributions of Dublin City Council officials to the meetings. Members of CIG feel that it was very difficult to obtain clear answers to their questions from some of these officials. This leads them to the belief that most of the decisions about a thermal treatment plant at Poolbeg have already been made, and that this exercise is simply a token gesture towards consultation.

On some occasions the CIG have felt that they are wasting their time, especially when they hear that the City Manager has the ultimate decision-making powers in this situation. They wonder what is the point of engaging in a consultation exercise if the results of their deliberations do not go towards influencing a final decision. The sense that they are not being listened to is particularly disheartening given the amount of time and effort they have put into the process, and the fact that the commitment has turned out to be more lengthy than they had originally expected.

There are substantial fears that this process is being taken by officials to represent the public consultation they are required to undertake before proceeding with the development of a thermal treatment plant. Members of CIG however, feel that their small, information-gathering group, should not be taken as a consultation group since they do not represent the community, and have no mandate from this community. A series of meetings with 18 people should in no way be seen by authorities as a substitute for full public consultation with residents and community members. However, there is little optimism at the moment that proper consultation will be undertaken, leaving the members of the CIG feeling that they are simply pawns on a larger chess board.

### *Community Misinterpretation:*

There are also concerns that the motives of the CIG committee have been misinterpreted by some members within the wider community. There is a mistaken belief held by some that participation in the CIG process is tantamount to agreement with a proposed thermal treatment plant. This was the reason for the resignation of some of the members, who were under the impression that they would not be able to present legal objections to thermal treatment at a later date if they were seen to have participated in this process. The result of these resignations is that some people believe the remaining CIG members to be in favour of thermal treatment, when almost completely the opposite is the case.

Many of those on the CIG committee are completely against the idea of thermal treatment, and have participated in the process as a way of finding out information that will strengthen their argument. Others began the process with a more open mind on the issue, but their experiences to date, and their inability to feel they are achieving something worthwhile in the face of bureaucracy, has meant that they are now very unlikely to approve of thermal treatment. Many feel that thermal treatment in any area in Dublin is wrong, and that there are alternatives which have not even been investigated, such as the New Zealand model (“Zero Waste”), and that Dublin City Council has not demonstrated that there is any ‘need’ for thermal treatment in the first place. While a smaller number of people in the group may have no objections to the principle of incineration, they too have been disillusioned by the failure on the part of the authorities to show that all the options for waste disposal have been properly explored.

It is very frustrating therefore, for the CIG members to hear that they are considered by outsiders to be furthering the cause of incineration, and to be helping to speed up the process whereby a thermal treatment plant is installed on the Poolbeg peninsula. In fact they feel they have done everything in their power to have the issue re-examined, and to have the process slowed down, but that their efforts have gone unnoticed or unappreciated by others in the community.

All of this has made it very difficult on occasion for the CIG members to retain any enthusiasm for their role. Instead, there has been a growing feeling of frustration that, not only are their motives misunderstood by their fellow residents, but also that they are unlikely

to get anywhere with the authorities they are dealing with. For some people this sense of frustration, combined with the length of time the process was taking, led to a desire to resign or withdraw from the process.

The resignations have meant that numbers in the CIG committee are somewhat depleted. Those who have resigned are missed by those who remain. One important reason for this is the fact that many of them would have been particularly well informed about thermal treatment and related issues. These were people who were able to ask the authorities “hard questions”, and to put them under some kind of pressure. While some of those who resigned did so out of a belief that the CIG was not the forum to ask their questions, their departure has left the remaining members feeling even more burdened: “We stayed on to ask the hard questions, but we’re not getting any answers.”

As mentioned already, there have also been misunderstandings surrounding the role of the CIG members, who are adamant that they do not represent any branch or segment of the Ringsend community. However, there is a belief that they are still seen in some quarters as speaking for the groups or organisations to which they are affiliated. The CIG would like it to be made clear that this is most definitely not the case, and that they have participated in the process simply as individuals with an interest in the issues.

### *Group Dynamics:*

There are also some feelings of frustration around the whole issue of group dynamics. It has taken considerable time for the group to 'gel' or to learn to act as a cohesive unit, leaving many people feeling that the process did not really get off the ground until a number of meetings had elapsed. In some cases there is a belief that the CIG members still have marked differences of opinion or agenda that has meant that even now, they are not functioning as effectively as they might.

The selection process used to identify the CIG members has already been outlined. However, the perception of many of those within the group is that reality was quite different. Some people feel they were invited to participate with only a phone-call, others were invited or nominated in lieu of other community members who were unable to participate. There are stories of some people being approached in person to be invited to join the CIG, while others did apply to participate by filling out a formal application form. Even where people did fill out one of these forms, some were unaware of what they were applying for, and few were prepared for the length of the commitment involved. Of the 13 remaining members of the CIG, very few have the same story about how they started out on the group in the first place, in spite of the actions of the independent selection committee.

These differing experiences about how various people came to participate in the CIG process have led to some difficulties with regard to group cohesion. Some people feel more like outsiders than others, often due to the fact that they live further away from the community, or to the fact that they are perceived to have personal agendas not shared by the other members. While most of these difficulties have receded as the process progressed, the initial meetings did not always run smoothly. This is combined with usual group dynamic issues of some people being more dominant than others, and some members having a higher level of technical knowledge than others, which could on occasion lead to feelings of frustration.

### *Information and Deadlines:*

There are also outside factors to take into account when discussing the way in which the group functioned. In the first place the time given over to the entire CIG process was seen as far too short to accomplish all that was set out in the beginning. The CIG were required to assimilate a vast amount of information, and they were given very little time or support to allow them to accomplish this satisfactorily. For this reason five meetings extended to seven, extra meetings in between the official sessions were introduced, and the overall process is still underway in October 2002, well past an original deadline of April 2002. The short extent of the original timetable is seen as yet another indication that Dublin City Council are treating this as a token gesture of consultation, since they were seen to make it extremely difficult for the group to achieve their aims.

In addition to this, the information supplied to the group was both too detailed and too extensive to be of much use. Most people felt they would have needed technical expertise to decode some of the information they were given, and it required substantial commitment with regard to time in order to simply read through it all. Dublin City Council have agreed that their approach was misguided in this regard, but the effect has been to make many members of the CIG feel either alienated or patronised.

Even the experts who were invited to speak at some of the meetings were inclined to be too technical, and often presented contradictory viewpoints, which made it difficult for the CIG to properly assess what they were being told. The general feeling is that too much information, or information that is not easily accessible, is worse than no information at all. For this reason, many of the meetings felt more like briefing sessions than meetings for consultation, another reason for the CIG request to extend the process, so that the group could have some opportunity to discuss the implications of all that they had heard.

Once again, this has left CIG members feeling disenfranchised by city officials, and it has added weight to their suspicions that this exercise has not been taken seriously by the authorities. CIG believe that a number of barriers were deliberately placed in their way throughout this process, and that each hurdle has required considerable energy to get over, before the group could go back to their original task of gathering information of relevance to their community.

The amount of information involved meant that CIG meetings had to cover a lot of ground. This often meant that the group felt pressured to address certain issues before they were ready, or before they had achieved satisfactory answers to previous questions and concerns. A number of people felt that the group did not have enough time to formulate a strategy or an ideal approach whereby the important issues could be decided on in advance of a meeting and then pursued during the meeting. This was one of the reasons for introducing extra meeting dates.

There were also concerns expressed that there was little time in the meetings given over to summing up what had been learned, or to identifying a group position to take to the next stage. In some cases this was due to time constraints, but there were also concerns that the wider agenda might have been dictated by those outside the group. As it was, the CIG group took a long time to begin functioning in an effective manner, whereby issues of importance were identified and pursued cohesively, and where individual agendas were left aside.

The concerns over tight deadlines have even extended to the production of the CIG report. Dublin City Council were anxious to have the report ready by the time developers were invited to tender for the contract to build and operate a thermal treatment plant in Ringsend. Dublin City Council claim that this is so the CIG can feel confident that any developer appointed in the future will have a full appreciation of the concerns that those in the area are likely to raise. CIG members themselves, however, feel they do not want to do so much background work on behalf of a developer of a project they do not support, and they are resentful of City Council's attempts to hurry them through the process.

On a number of occasions the CIG have asked Dublin City Council to postpone the procurement process (whereby developers are invited to tender for the contract), so that the work done by City Council in assessing the need for thermal treatment, and in selecting Poolbeg as the preferred site, can be properly examined. Dublin City Council have proceeded according to their original timetable however, and while the CIG process has been extended, the timetable for the procurement of a developer has not. Once more, this compounds CIG feelings that the process they have been involved in is actually superfluous, and was never intended to make any difference to Dublin City Council's plans.

The CIG report has been compiled in a very short space of time. Indeed, most members of the group agree that the time allowed to them by Dublin City Council has been far too short to allow them to sum up all the issues of importance to them. For this reason they are resistant to attempts to get them to deliver it before they are ready, and have in fact decided to set their own timetable in this regard, with little further reference to the suggestions or requirements of Dublin City Council.

## Site Visits

Throughout the CIG process, members of the group were given the opportunity to visit thermal treatment plants in other countries, in order to see how they operated, and how they were integrated with the surrounding areas. Most of the group opted not to avail of this opportunity.

For some, the burden of extra travel and time was not one they felt able to take on, and one which they were not prepared for when they began the process. But more seriously, the offering of these site visits was seen by some outside observers as an offer of free junkets for the CIG members. Since the CIG were giving up much of their personal time to participate in the process, this misinterpretation was particularly hurtful, and so many decided not to avail of the site trips for this reason.

Others in the group felt that journeying to see a thermal treatment plant elsewhere would be tantamount to agreeing to the option of incineration, and they did not wish to send this signal. Still others felt that it would not be a helpful exercise, since they would not be comparing like with like. While other countries might be able to demonstrate that thermal treatment works well and is not harmful to the local environment, there was a belief expressed that these countries have many more resources and a much better infrastructure than Ireland. A well operated incinerator in Denmark or Austria is seen as no guarantee that similar standards would be attained in Ireland, and indeed there is considerable scepticism about the ability of the Irish authorities to enforce these standards.

Members of the group also wish to point out that the thermal treatment plants they were invited to visit were very dissimilar to the one being proposed for the Poolbeg peninsula. None of the plants identified were of a similarly large scale (over 700,000 tonnes), and many of them did not even treat the same kind of waste that would be treated in the proposed Dublin version. As already stated, they were also plants with a much higher degree of accessibility, and a better developed infrastructure.

The CIG also made requests to see how large-scale recycling plants worked in other countries, or how other forms of waste treatment were catered for. They feel however that no such facilities were included in the list of site visits that they were offered. This compounds

their view that they were being encouraged to accept incineration as the only option, and indeed as a done deal, throughout the process.

One member of the group did choose to go on a site visit, and went to a thermal treatment plant in London. The trip proved interesting, but there was a strong feeling from the rest of the group that the more difficult questions posed by the member were not answered, either by the operators of the plant, or by those monitoring its impact on the local area. Little reassurance resulted from this trip therefore.

## Experts and Resources

In order to provide the CIG with as much information about thermal treatment as possible, Dublin City Council made resources available to recruit expert speakers on a variety of subjects. These experts ranged from those involved with environmental law to those whose area of expertise was air-born pollution or climate. The group in general appreciated the chance to be able to hear from these experts, and for the most part the feeling is that Dublin City Council personnel worked hard to source the visiting speakers, and to persuade them to attend. Most people agree that they learnt a lot from this experience.

As the process continued, it began to emerge that many people within the group wished for greater clarity as to how thermal treatment was decided on as the preferred method of waste disposal and how Poolbeg came to be the preferred site for this facility. The responses of Dublin City Council on these issues were seen as less than satisfactory by the CIG members. For this reason it was agreed that Dublin City Council would fund a legal team for the CIG so that a legal examination could be made of the process by which the proposal for a waste to energy facility was put into practice. This legal examination is now complete, and the findings of the team are available under separate cover.

Dublin City Council have also made funding available to assist the CIG in compiling a report of their process and of the information they have uncovered as part of the process - namely this document.

While Dublin City Council and in some cases M.C. O'Sullivan have made these funds available, the CIG feel that they were never in full control of the resources. They were not given funds to use as they saw fit, but instead had to apply for them each time they felt a need for a certain piece of information, or for a certain approach to be taken. There is also a sense that the group had to fight hard for these resources to be made available, making them feel that Dublin City Council were trying to create obstacles instead of helping them in their quest for information.

The CIG also feel that various conflicts of interest on the part of the facilitator and some of the expert speakers have been exposed throughout the process, and they would like to have seen these conflicts be declared at the outset. Some members of the group believe that a

number the speakers and the facilitator were not properly independent, and were instead more likely to promote the agenda of those who were paying for their services. As a result, the CIG members believe that many of these speakers were actually trying to get the group to accept the prospect of thermal treatment, instead of simply providing them with the required information. There are also those that feel that the opinions of city officials and of M.C. O'Sullivan were facilitated to a greater extent than their own discussions and debates within the course of the meetings.

## Part Two

## Gathering Information

Since one of the main aims of the CIG process was to uncover information that would be of importance to the Ringsend community when considering the impact a thermal treatment plant would have on their area, most of the meetings were directed towards gathering this information. This section of the document will compile the main issues that were uncovered in the course of the process, and it is for the CIG committee themselves to decide if they would like this information to contribute to a future scoping document, or whether they would simply like it to be recorded for the benefit of the wider community.

A variety of guest speakers were invited to attend CIG meetings, each with particular areas of expertise that would help inform the debate surrounding thermal treatment. Resources were made available from Dublin City Council to allow these experts to attend. The CIG group also met with the Dublin City Manager and his colleagues, in an effort to discover the background to the Waste Management Plan, and to the selection of Poolbeg as the preferred site for a thermal treatment plant.

The CIG would like to note that in some cases the expert speakers were not selected by themselves, but were instead brought forward by Dublin City Council or M.C. O'Sullivan, leading them to be sceptical about whether these experts were truly unbiased, or even how useful they might be for the purposes of the CIG. In one particular case, for example, the CIG feel they asked for someone with expert knowledge of the local climate, but that the speaker who was invited did not have this local knowledge. While he provided the group with interesting information, this lack of knowledge meant that some questions remained unanswered.

There follows a summary of the issues CIG consider most important when considering a proposed thermal treatment plant for their area.

## Siting and Proposed Technology

### *The 'Preferred' Site:*

From the beginning CIG were anxious to know what kind of thermal treatment plant was being proposed for their area, and also how Poolbeg Peninsula came to be the preferred site for such a plant. Members of CIG themselves have strong reservations about the suitability of this site, largely to do with the amount of heavy industry which is already in the area, and with the lack of a proper infrastructure to cater for increased traffic in the region.

It took a number of meetings before the actual site on the Poolbeg Peninsula was identified for people on a map. Dublin City Council maintained that the final site could not be designated until a developer had been chosen, and had submitted specific plans for the plant that would be built. CIG believe however, that in order for the site in question to be 'preferred', and in order for a compulsory purchase order to be made on surrounding land and buildings, Dublin City Council must have known exactly where the plant would be situated from much earlier on in the process. This could also indicate that the type of technology that would be used, and maybe even the developer itself, had also been decided and known to Dublin City Council at the same time as CIG was being told that this knowledge was not yet available.

On a number of occasions the minutes and transcripts of the CIG meetings record city officials saying that the developer would be the one who made the final decision on the size and precise location of the site for the thermal treatment plant. This was the general response to questions on these issues. However, the fact that land in the area has already been placed under compulsory purchase order means that the CIG are now of the opinion that they were misled on each occasion this answer was given to them. Instead they feel that Dublin City Council and M.C. O'Sullivan always knew the exact site in question, and that attempts to claim that a developer would make this decision were deliberately misleading. Claims on the part of the authorities that the Poolbeg site was only a 'preferred' site, or one that was still under consideration are similarly misleading.

One of the reasons that was offered by authorities in the course of the process for the preference of the Poolbeg Peninsula for the site of the thermal treatment plant was that its

chimneys would not be too obtrusive among other plants and stacks that are already in the area. However, the CIG members have since discovered that numerous chimney stacks in a single area can impact on one another, having substantial implications for the dispersion of emissions and the build up of pollution.

This was discovered in the course of a talk given by a meteorologist, who pointed out that stacks in close proximity to each other could set up what is known as a ‘looping effect’ whereby the emissions actually move around in circles, or are dispersed towards the ground, instead of being dispersed higher up into the air. The meteorologist, Dennis Fitzgerald, pointed out that modelling studies would need to be conducted in order to predict this phenomenon properly. The Assistant City Manager claimed that these studies would be carried out as part of an EIA, but the CIG are of the opinion that the fact that this effect has not been studied before now, indicates that the selection of Poolbeg as the preferred site was not carried out properly, and instead was a quickly made decision to suit interested parties, rather than an effort to select the best possible site for a waste to energy facility.

Originally CIG were told that there were four possible sites for a thermal treatment plant in the Dublin area. They would like to have seen these other proposed sites or heard more about them, and spoken to any CIG committees that were in these areas, in order to compare notes and possibly draw up a strategy for waste disposal that would suit all parties. However, they have subsequently found out that there are no other CIG processes going on in Dublin, further indicating to them that other sites were not properly considered, and that the siting of a thermal treatment plant at Poolbeg was a forgone conclusion.

This perception of Dublin City Council and of other personnel involved in implementing the Waste Management Plan as being reluctant to answer questions or provide information, means that there is little inclination for CIG to give anyone the benefit of the doubt at this stage in the process. The feeling is that it took so long to get such basic information about what they were meant to be discussing because facts were deliberately being withheld from them, or the group as a whole was being misled.

This in turn has meant that many CIG members find themselves disillusioned with the process as a whole. They do not see any evidence that their views are being listened to, and believe

they are simply there to show onlookers that Dublin City Council have conducted consultation with members of the community.

### *The Need for Thermal Treatment:*

There was also considerable discussion during CIG meetings regarding the actual need for thermal treatment as a means of dealing with Dublin's waste, with some members of the group believing that this had not been adequately demonstrated by Dublin City Council. There are those who would like to see the question of waste management for the Dublin area reopened, so that other methods of waste reduction and disposal could be explored.

The EU directive regarding waste management has instructed member states to reduce, reuse and recycle waste before options such as thermal treatment and landfill are explored. There are many within the CIG process who believe that not enough attention has been given to reducing, reusing or recycling waste until now, and that the response of the city officials is to try to kill all the birds with the single stone of thermal treatment. Some members of the group would like more information about how the need for thermal treatment was clearly established by Dublin City Council. It is something that was laid out in the original terms of reference for the group, but members do not feel that the issue has been properly addressed by the authorities.

Indeed the EU directive does not indicate that any country *has* to use thermal treatment as a waste disposal method, and simply includes it as an option that may be considered only after waste is reduced, reused or recycled. The CIG feel that they have been put under pressure to accept the option of incineration by authorities who claim that the EU is the driving force behind such a proposal. The CIG members would like it to be made clear that they believe that all attempts to advance proposals for thermal treatment are coming from the Irish authorities, and not from Europe, as they have been encouraged to think.

Claims that the waste to energy project will make energy available for a variety of uses such as home heating, are also seen as misleading, since there are already several electricity power stations on the Poolbeg peninsula that are producing heat as a by-product of their operation, and there is currently no market for this energy. The CIG find it difficult to believe therefore, that energy resulting from thermal treatment of waste at Poolbeg will suddenly be deemed necessary and important, and they are more inclined to interpret these claims as attempts on the part of the authorities to make the proposal seem more palatable.

For all of these reasons there is considerable demand on the part of CIG for the debate surrounding waste management to be reopened. They would like to have further information about whether thermal treatment is really necessary, and whether other technologies or approaches might not be more successful in addressing Dublin's waste problem. There are those in the group who emphatically believe that the need for thermal treatment in Ireland has not been adequately demonstrated, and they refuse to accept it as a proposal for the Dublin area.

As mentioned above, the CIG would also like to re-examine the way in which Poolbeg came to be the preferred site for a waste to energy facility for the entire Dublin region. Some councillors serving on Dublin City Council have indicated that they did not know what they were agreeing to when they voted for the Waste Management Plan in 1998, and so questions have been raised over the legality of the siting process, and whether the City Manager acted properly in this selection process. While Dublin City Council believe they have acted legally and correctly at all times, they have provided resources for the CIG to retain legal counsel in order to explore if this is in fact the case. The document detailing the findings of this legal study is available separately.

Some members of the CIG committee would like these issues to be addressed before proceeding any further. They would like the whole subject of the siting and feasibility of thermal treatment in Dublin to be readdressed, and they would like the public to be aware that what they have learnt to date makes them believe that the waste management process as a whole has been seriously flawed. They do not feel there is much point in discussing other issues surrounding thermal treatment until clarification has been achieved in this regard, and there are serious objections to attempts to hurry them through a consultation process when all the information regarding the background to thermal treatment for Poolbeg is not available. In many ways it strikes people as being a backwards process, where "the cart has been put before the horse."

Others within the group feel that decisions have already been made by Dublin City Council in relation to waste management, and a suggested thermal treatment plant for Poolbeg is one of these decisions. They would now like to make clear the dangers and risks involved in having such a plant in their area rather than to debate how the decisions were made in the first place,

since they feel it is unlikely that they will be able to alter these decisions. The concerns of this group are outlined in the following pages.

## The Scale of Proposed Thermal Treatment Plant

The thermal treatment plant proposed for the Poolbeg Peninsula is predicted to have a capacity of more than 700,000 tonnes of waste. This is something regarded very seriously by the CIG for a number of reasons.

In the first place, the size of this plant will mean that the emissions from its chimney stacks will be greater, as will the quantities of residual waste which will still have to be disposed of in some manner - such as toxic fly ash and bottom ash. A plant this size will also mean that the number of trucks required to transport waste to and from the facility will be greatly increased, with attendant congestion and pollution problems.

However there also concerns about the life-span of an incinerator built to this scale. Thermal treatment plants require a certain level of waste in order to function efficiently and safely. A decrease in the amount of waste being fed to an incinerator can mean that it ceases to operate at its optimum level, and emissions increase and become less safe. The CIG have heard of a number of plants in Europe that have had to close down because they no longer have enough waste coming in, and they are very concerned that Dublin does not seem to be learning from these lessons.

If society's attitude to waste management is revised - even to a limited extent - reducing, reusing and recycling waste will become much stronger options for waste disposal. This will reduce the amount of waste that needs to be disposed of by incineration, and the danger is that a 700,000 tonne facility might very quickly become out of date. There were some fears expressed that the authorities might even resort to importing waste from other countries in order to avoid this problem.

On a number of occasions the CIG have discussed alternative means of waste disposal, and one possibility that was raised by a few members was that a number of smaller waste facilities be constructed around the Dublin area. The advantages to this approach are that no one area is over burdened with such a facility, traffic is not congested around a single plant, and if Dublin manages to reduce its waste output, one of these smaller plants can be closed down without the same difficulties or cost implications of shutting down a larger one. In general, members of the CIG do not believe that the residents of Ringsend, Irishtown and Sandymount

should have to bear the brunt of the waste problem that is a matter for all of Dublin, and not just a localised problem.

Another means of waste disposal that was also raised by some CIG members is that of anaerobic digestion, which would also produce energy as part of the process, as well as rendering the waste biologically inert, under the terms of the EU landfill directive. However, the feeling is that the authorities have not explored this option properly, and have taken no steps to present it to the CIG as a viable alternative to thermal treatment.

There has also been much discussion of recycling in the course of the CIG meetings, and many members would like to see this option presented by Dublin City Council with more enthusiasm and more resources than has previously been the case. Information has been found detailing how other countries and cities have been successful in increasing their recycling rates, which both reduces the amount of waste going to landfill or being incinerated, but also provides employment. Dublin's track record has been seen as very poor in this regard, but many CIG members believe that if a proper recycling infrastructure is put in place, residents in the Dublin area will be eager to take this opportunity to dispose of their waste more responsibly. As mentioned before, this approach could quite conceivably make the idea of a single large incinerator redundant.

The CIG do not feel that any of these options for waste disposal have been adequately explored by Dublin City Council or by M.C. O'Sullivan, and they would like the whole question to be readdressed, along with other possible locations that could be considered as sites for smaller thermal treatment plants. The Poolbeg area is already seen as having more than its fair share of heavy industry and undesirable processes, and to situate a large incinerator for the whole of the Dublin area in this region is seen as one burden too many. This is all the more galling when such a facility would be expected to deal with waste from the entire Dublin region. The CIG members believe that the subject of waste disposal should be one that everyone in the Dublin area is concerned about, and not just those who may be in the immediate vicinity of an unwanted incinerator.

The fact that the authorities seem to be so set on Poolbeg as the preferred location for a thermal treatment plant, regardless of the opinions of locals, indicates to the CIG that what is at stake here is not the best means of waste disposal, or a way of safeguarding the

environment, but instead a series of financial and political agendas that have overridden the concerns of those who will actually be affected by such a plant.

## Health

A number of CIG members have serious concerns about the impact a thermal treatment plant will have on the health of those living in the surrounding area. Residents of Ringsend and its environs are already seen as been heavily burdened with problems of ill-health, especially respiratory conditions such as asthma. This is due to high levels of traffic and of pollution from industries in the area. Siting a thermal treatment plant in Poolbeg will only exacerbate these problems.

The emissions from such a facility are seen as serious health risks by many people. The CIG do not feel that any of the information they have uncovered in the course of this process allays these fears. There is little inclination to trust officials to monitor or regulate the activities of an incinerator properly, and so claims that the emissions will be of safe levels are often dismissed.

These emissions will affect the air quality in the area, increasing respiratory ailments, and generally affecting the quality of life for local residents. However, many people believe that the emissions will also be discharged into Dublin Bay, which will have implications for the marine environment, and also for the food chain. For example, food grown within a 30 km radius of the plant will not be able to be described as 'organic'. Dioxins resulting from the incineration process may also end up in the food chain, and CIG are not yet convinced that the levels will not be harmful. There are some concerns especially that dioxins might have a previously unresearched effect on unborn children.

Since the US EPA have said that there is no safe level of dioxin, and since dioxin accumulates in certain tissue, the CIG is concerned with the long-term effects of producing dioxins and other poisons, especially in such enormous quantities in the ash. The CIG believe that the EU permitted levels for emissions are not based on health research or epidemiological studies, but rather what is possible technologically.

All in all, while CIG have heard from some experts about the likely emissions from a waste to energy plant, they do not feel that what they have heard is either clear, or reassuring. In some cases the possible health impacts have not even been fully researched. CIG would like to

make sure that an EIA addresses the whole area of local health, and that the community are made aware of the health risks that may be part of siting thermal treatment in this area.

## Traffic

The issue of traffic is one which many members of CIG feel particularly strongly about. Ringsend is already seen as having severe problems with regard to traffic congestion, especially since it is so close to Dublin's port area. Heavy goods vehicles already use the narrow roads of Ringsend as their main route into the city, and this has been something that locals have been anxious about for quite some time.

A thermal treatment plant will merely serve to increase the traffic levels in this area to intolerable levels. People believe that there will be a constant stream of trucks into and out of the plant, which will cause congestion, but will also make the area increasingly dangerous from a road safety point of view.

In addition to this, greater numbers of trucks will increase the noise and the pollution levels in the area, and will therefore have a substantial impact on the quality of life in Ringsend and immediately surrounding areas. There is also the issue of the safety of the waste that these trucks will be carrying. People should be concerned about how it will be packaged and transported, and whether the methods used will be safe enough.

The CIG members do not feel that they have heard anything that indicates that this traffic problem can be avoided or managed effectively, and they are adamant that the infrastructure of the area is in no way capable of dealing with this extra burden.

## The Environment

While concerns about the CIG process and the siting of an incinerator are foremost, followed by concerns about health and traffic, there were a number of mentions of the environment and the impact a thermal treatment facility will have on this environment.

Dublin Bay is acknowledged as a special amenity area, and many people have already witnessed the long struggle to clean it up after inadequate sewage treatment facilities. To plan a thermal treatment plant for almost the same area is seen as short-sighted at best. The belief is that it is inevitable that some degree of environmental impact will be experienced as a result of thermal treatment, and people are concerned that a valuable amenity will be irreparably damaged.

The CIG believe that the air quality in the area will be diminished by the emissions of a thermal treatment plant, and also that residual waste will be discharged into the sea. This means that the quality of the water in Dublin Bay will be severely affected, which will have implications for bird, animal and marine life all along the coast, as well as disimproving the environment further for humans. Even the construction of such a plant will have implications for the environment, let alone its operation. While the Poolbeg Peninsula is already seen as particularly badly affected by industrial plants and their negative impacts on the environment, the belief is that steps should be taken to improve this situation, rather than to further compound it with a thermal treatment plant.

Few reassuring answers have been given about how such a plant will affect the environment, with no plans available for the disposal of either bottom ash or toxic fly ash, and no credible procedures in place for the monitoring of emissions. The CIG do not believe that their questions have been properly answered in this regard, and they would like the community to be aware of the threat to their local environment.

There is also very little inclination to trust Irish authorities to make sure that environmental safeguards are put in place, or adhered to. If something goes wrong with a thermal treatment plant, the belief is that the damage to the surrounding environment will be irreparable, and at the moment there is little confidence in the authorities to make sure that such a catastrophe could not occur.

While the CIG did hear about the Environmental Protection Agency (EPA), and its monitoring duties aimed at guarding against threats to the environment, they have also heard stories that have led them to regard this monitoring as flawed. The CIG have heard that companies and plants are given advance warning of an EPA visit, and are therefore able to present a pristine operation to inspectors, when the daily reality might be something quite different.

## Regulation

As mentioned earlier, there is considerable scepticism that Dublin City Council, or any other body of officials will be able to properly regulate any new thermal treatment plant on the Poolbeg Peninsula. This has much to do with the previous track record of such authorities, and with the recent scandals surrounding illegal dumps, and improperly regulated procedures. The CIG members do not believe that they have been convinced that things would be different this time around.

This scepticism has not been helped by the lack of transparency surrounding the siting of the proposed plant, and the decision regarding most suitable technology. Since the CIG have been unable to get clear answers as to how Poolbeg came to be the preferred site, or even as to whether incineration really is the necessary approach to waste management, they do not believe that monitoring or regulating procedures would be any more transparent or reliable. Quite a major public relations exercise would need to be undertaken in order to convince people that proper procedures would be in place.

In fact many people believe that Poolbeg has been deemed the preferred site for thermal treatment in order to allow the authorities to further cut corners. Some people cited the location of the sewage treatment plant adjacent to the proposed thermal treatment plant, suggesting that dried sewage might be used as fuel for the incinerator. A nearby scrap yard might enable industrial, chemical and illegal waste to be disposed of in this incinerator, while the coastal location might allow waste to be imported from other countries in order to enable the thermal treatment plant to operate at full capacity.

While these suggestions are merely theories at this stage, it is important for Dublin City Council to realise that an absence of transparency and a lack of straightforward information merely encourages the growth of this kind of speculation.

## The Views of the Experts

Resources were made available to allow the CIG to hear from a number of experts to address their meetings, outlining points of importance with regard to thermal treatment, and indicating areas that CIG should highlight if they decide to prepare for an EIA by contributing to a scoping document. A summary of the experts who spoke at CIG meetings, and of their main points follows. Full transcripts of their addresses to the CIG are available separately.

### *Dr. Jim Wilson:*

Jim Wilson is a member of the lecturing staff at Trinity College Dublin, and his area of expertise is Dublin Bay. His presentation to the CIG identified a number of questions he would want answers to if he were involved in the process. He encouraged the CIG to consider four phases of the planned thermal treatment plant; construction, plant operation, associated activities, and decommissioning. For each of these stages, CIG would need to consider how the waste from a thermal treatment plant was being disposed of, and what effects this would have on the surrounding environment. Jim suggested that CIG ask where contaminants from the proposed plant would go, and whether they would pose risks to life-forms - either human or animal. Considering the fact that the thermal treatment plant would be built in a marine environment, CIG would particularly need to consider its effect on local waters and on coastal areas.

*Karin Dubsky:*

Karin Dubsky is a member of Coastwatch Ireland, and she addressed the CIG on issues surrounding the siting of a proposed thermal treatment plant, and the need for incineration as a means of waste disposal. One key point identified by Karin is that a thermal treatment plant needs a certain volume of waste in order to function efficiently. If Dublin's plans to increase the rate of recycling are successful, a large thermal treatment plant might quickly become redundant. There are facilities in Austria which are currently experiencing this problem. Karin therefore encouraged CIG to expand their remit so that they could look at other forms of waste management in conjunction with incineration, thereby establishing whether there is a real need for thermal treatment, and if so, how large the plant should really be.

Karin also suggested that the group explore proposals for disposing of ash from an incinerator, as some of this ash is highly toxic. There is also a need to have monitoring and compliance procedures clearly laid out so that there can be a bond of trust between Council officials and the community. CIG should also examine the impact on the environment of something going wrong with a proposed thermal treatment plant, and assess the ability of the authorities to inform and protect the public in such an event.

*Professor Yvonne Scannell:*

Yvonne Scannell is Professor of Law, Environmental Law and Policy at Trinity College, and her area of speciality is environmental law in Ireland and Europe. Yvonne pointed out that EU regulations require Ireland to reduce the amount of waste going to landfill by 75%. This is going to prove very difficult without introducing a waste to energy option such as thermal treatment. She pointed out a number of problems Irish society is facing at the moment with regard to waste management, citing difficulties with proper recycling as an example. She felt that some of the main areas to examine when considering the impact of thermal treatment on the Ringsend area would be traffic, pollution, disturbance to amenities and perhaps property values.

Since European standards regarding emissions from incinerators are already so high, Yvonne believes that it is unlikely that residents will be able to object to a thermal treatment plant on this front. Instead, they should focus on some of the traffic implications of having an incinerator in their area, and try to get as much covered in the EIA as possible - including possible effects on wildlife in the area. The fact that Dublin Bay is regarded as a Special Amenity Area will mean that a developer will have to be very careful not to impinge on the conservation area when he is submitting his plans. Yvonne also reminded the group that anyone can simply appeal against planning permission or the granting of a waste license for this facility, which gives Irish people considerably more scope for objection than their European counterparts, who would have to demonstrate their reasons for objecting.

*Conor Skehan:*

Conor Skehan's area of expertise is in Environmental Impact Assessment. He specialises in the prediction and evaluation of the impacts of large scale projects. Conor advised the CIG that they would be unlikely to succeed in objecting to a thermal treatment plant on the grounds of dangerous emissions. Once such plants are run properly the levels of emissions are generally very safe, and so local residents would be wasting their time and energy in trying to stop an incinerator purely on that basis. Instead, Conor suggested that people concentrate on what they know best - their own local area and how a thermal treatment plant would be likely to affect it in terms of increased traffic, or how the local flora and fauna would be affected.

Conor also reassured the group that an EIA is extremely thorough, and that it is a developer's own interests to comply properly with such a survey. The results of an EIA do not allow a developer to hide possibly negative impacts. There is also the Environmental Protection Agency which monitors the emissions from various industrial plants around the country, and if any of these emissions rise over the approved level, inspection teams are brought in.

Conor's belief is that the local community will have very little success in trying to attack the proposed plant on grounds of emissions or environmental law. Instead their energies should be focused on possible impacts on the immediate lives of locals. In this way, even if the thermal treatment plant is not stopped, the process will have helped to ensure that the best possible facility has been obtained for the area, with the minimum disruption to people's lives.

*Martin Hederman-Robinson:*

Martin is a lawyer in the EU Commission's Unit for Sustainable Resources, Consumption and Waste. He attended the CIG meeting in lieu of Marianna Klingbiel, and under the instructions of the EU Commissioner for the Environment. Martin urged the CIG to remember that incineration was not the only alternative to landfill, or the only means of reducing the levels of waste going to landfill in this country. Other approaches such as composting and recycling should also be considered. He also pointed out that the EU has at no stage insisted that member states introduce thermal treatment as a means of reducing the amount of waste that goes to landfill.

One of the areas Martin identified as needing further exploration was what happened to the ash produced by an incinerator. He acknowledged that different EU countries had different guidelines with regard to this issue, but that some of the ash will be extremely dangerous. He also reminded the group that they have the right to ask questions of the Environment Commission, or to lobby them regarding a particular issue. While it may be a time consuming process, the powers of the EU Commission for the Environment should not be underestimated.

*Frank McDonald:*

Frank McDonal is the Environmental Editor of the Irish Times, and has a wide range of knowledge on planning and environmental issues. Frank reminded the group of Ireland's poor performance to date with regard to waste management, and that it was a problem that needed to be faced by everyone, since everyone has a hand in producing this waste. He also encouraged the group to look further into how waste management directives would be enforced by local authorities, especially in the light of some recent scandals regarding illegal dumps.

Frank spoke of thermal treatment plants that work very well and safely in other European countries, but felt that the same level of confidence in the authorities does not exist in Irish society. One of the big issues to consider if a thermal treatment plant is put in the Ringsend area however, is that of increased traffic, and Frank did not see any easy way around this problem. He himself would be in favour of spreading facilities around Dublin, to avoid too much strain on the infrastructure of one particular area. He also reminded the group that the procurement process might establish other options for waste management that did not involve incineration on site, and that they were not to lose heart in the process they were involved in.

*Dr. Hendrik Van Der Kamp:*

Hendrik is Head of Planning and Development in DIT in Bolton Street, and is also a Senior Inspector with An Bord Pleanála. Hendrik addressed CIG meetings twice, and encouraged the group to consider where the benefits and the disadvantages of a thermal treatment plant might be felt. If an area or group of people are particularly disadvantaged by the construction and operation of an incinerator, some kind of compensation might be offered, but the CIG might want to consider if this is a sufficient or worthwhile approach.

Hendrik also spoke about the perception of a waste to energy facility. At the moment most of the emphasis is on the incineration side of things, but such a plant would also be able to supply energy, which might be regarded as a positive outcome.

Hendrik then took the group through various planning processes for a thermal treatment plant. He described the means by which different areas in Dublin had different zonings depending on the predominant land use in the area. Poolbeg may have been selected as a preferred site for thermal treatment because of its heavy industry zoning. Hendrik mentioned that perhaps a more appropriate assessment might have been to discover what areas in Dublin had a transport infrastructure capable of dealing with a thermal treatment plant, what area would make best use of waste heat, and other similar factors. This might have identified a different preferred site for the waste to energy facility. At the same time however, it may be that Poolbeg really is the best available site for this plant. But Hendrik pointed out that it is often helpful to take a step back from the process and to review what has happened to date, in order to arrive at a clearer understanding of the issues involved, and the issue of site selection may warrant inclusion in an EIA.

*Dr. Dieter Schrenk:*

Dr Schrenk is a consultant to the World Health Organisation and the German Federal Environmental Agency, and his area of expertise is that of food toxicology, and the toxicological aspect of thermal treatment technologies. Dieter told the group that all thermal treatment processes led to the release of dioxins, and that this included the roasting or baking of food! The important thing therefore, is to discover the extent of the dioxins that would be released by a thermal treatment plant, and whether these dioxins would be present in harmful amounts.

He provided the group with examples from incinerators throughout Europe, where strict regulations were enforced, and the dioxin levels and the levels of toxic emissions were very low. If a waste incinerator is properly managed, and if controls are properly enforced therefore, Dieter believes that there are no health risks for the surrounding community. He suggested that the group should be asking questions about the levels of emissions of the planned facility so that the impact on local health can be accurately assessed, and how the fly ash will be treated after incineration.

*Dr. Paul Johnston:*

Paul is the Principal Scientist at the Greenpeace International Research Laboratory in Exeter, and is particularly knowledgeable in the area of toxins in the environment. Paul pointed out that there is actually no comprehensive assembly of information about thermal waste treatment, and that while Greenpeace has tried to gather together an archive, much of the material relates to old technology. As a result there is little available information about more modern forms of technology, such as are being proposed for the Ringsend area.

Paul also spoke of how it was difficult to get proof regarding the health impacts of thermal treatment. There are no continuous monitoring procedures, so checks on dioxin levels or emission levels can only provide a snapshot of what is going on. It might therefore be possible to underestimate these levels. He suggested that CIG should be asking questions around this area. They should also consider the fact that society could be encouraged to move towards recycling and waste reduction, and that incineration might turn out to be unnecessary if this was achieved.

*Dr. Andrew Farmer:*

Andrew is a biologist at the Institute for European Environment Policy in London, and his area of expertise is that of pollution control policies and the impact of thermal treatment on air quality and health. Andrew pointed out to the group that there is limited monitoring of air quality in Dublin at the moment, but that they would need to consider the impact of increased traffic in the area, as well as the emissions from a thermal treatment plant. While new technology might mean that the levels of emissions are reduced and improved, the increased traffic in the area might actually counteract this improvement, and this is something the community would need to look into. They might also like to explore the progress of dioxins through the food chain, and Andrew pointed out that incinerators are not the only producers of dioxins and pollutants. There are already many facilities on the Poolbeg peninsula that might need to be examined in this light.

It is also important to assess where the impact of pollution will be most felt. Measuring the levels of emissions is not sufficient, as these will eventually be felt elsewhere other than at the top of the chimney. If the impact of these emissions is felt in areas of human exposure, this might be something to concern people, especially if there is a cumulative effect with traffic emissions, and emissions from other industries. However, in order to properly assess this cumulative effect, locals need to know the emission levels that are already being experienced in their area. The climate of the area would also have an impact on levels of pollution.

*Owen Madden and Donal Mathews:*

Owen and Donal are from the Transport and Environment Department of Dublin City Council, and are traffic engineers with responsibility for traffic in Dublin, and for predicting and managing traffic increases in the city. Owen deals with traffic for the city in general, while Donal has particular responsibility for traffic in the south east of the city, and therefore for the Ringsend area.

They told the CIG about how they would examine the traffic implications of any planning application for a thermal treatment plant at Poolbeg. They would look at existing traffic in the area and examine how the proposed plant would impact on this, exploring what the extra traffic volume would be, and at what times of the day it would most apply. Dublin is already near its limit for traffic capacity, and if the extra volumes introduced by a thermal treatment plant were centred around peak times, the strain would probably be too much. If however, the extra traffic was focused on off-peak hours, the problem would be much less acute. The Port Tunnel would help alleviate traffic coming from the north side of the city, but plans to lessen the numbers of trucks using Ringsend as their route to the south of the city or country were not yet in place.

*Dennis Fitzgerald:*

Dennis is a meteorologist working with Met Eireann. His speciality is Agro-Meteorology and climate statistics. Dennis spoke to the group about inversions whereby the loss of heat from the ground can also cool the air that is in close contact with the ground. A warmer band of air often overlays these low level inversions, especially during winter, and pollution from a city can often get trapped at this level. This would be something to bear in mind when considering emissions from a thermal treatment plant. High chimney stacks would help the emissions to rise above the inversions and avoid getting trapped, but it is not something that could automatically be guaranteed. A number of chimney stacks in close proximity to each other could actually set up a 'looping' effect whereby emissions were not dispersed high up in the air, but were in fact directed towards the ground, or even remained static and accumulating.

Dennis also spoke about Ireland's prevailing winds. These are normally from a westerly direction which means that any emissions from a thermal treatment plant on the east coast would normally be blown out to sea. However, at times an easterly airflow can prevail for up to a week, and this would have implications for the pollution levels resulting from emissions that would not be dispersed, or would be blown back in over the city. It would be important for any proposed plant to show how their stacks would be constructed in order for people to decide whether the risks of pollution had been adequately dealt with.

## Summary and Conclusions

The CIG process has extended for some months beyond its original deadline of May 2002. This has been due to the difficulties of the members in extracting meaningful information from the relevant sources, and the time required to assess this information. As of yet, there are still strong feelings within the group that not all the necessary information has been obtained, and that not all of the group's remit has been carried out. The original timescale set in place by Dublin City Council is seen as far too short for the group to carry out their remit properly, leading them to believe that their work was never going to be taken seriously by the authorities anyway.

Revisiting the terms of reference for the CIG committee is a useful way of highlighting where the group feels it stands at the moment:

- There are strong fears that if the group identifies issues of concern regarding the proposal to build a Waste to Energy facility on the Poolbeg peninsula, this will be used to feed into a procurement process or a scoping document, which in turn may actually assist any developer of such a facility. In this way, CIG members are worried that their hard work might be used to help move the thermal treatment process along, when in fact they have considerable objections to the proposal for the Poolbeg incinerator. Some issues of concern were raised by the group, but the preference was to speak of these only in general terms, and not in specific detail.
- Some members of the group do not feel that they have had the opportunity to properly assess the work carried out by Dublin Corporation to determine the need for a Waste to Energy facility, or to assess the action that has been taken to identify an appropriate site for the facility. This is largely due to the perceived lack of transparency on the part of Dublin Corporation or Dublin City Council, whereby CIG members have been unable to get full information about how Poolbeg was selected as the preferred site, or even whether Dublin City Council have properly explored alternative means of waste disposal before opting for incineration.
- The CIG committee did have access to a range of experts in order to discuss the impact of similar facilities on other locations throughout Europe, and the effects on

the health and safety of humans and on the environment. However, on occasion this information was too technical for the group to feel it could be of much use to them. There was also little opportunity for the group to coordinate future strategies arising out of this information. Many members of the group feel that there was a lack of clarity and transparency in the information they gathered, and that in many cases questions were avoided or not properly answered. And so the CIG feel that they have not learnt all they wish to know about the realistic impacts of a thermal treatment plant on their area, or on the health and safety of the residents.

- Most members of the CIG committee have no desire to indicate any questions that would need to be addressed in an Environmental Impact Statement in order to respond to areas of community concern. To do so would not only help a developer to avoid potential areas of difficulty for himself, but it would be tantamount to doing a developer's homework. For this reason, the CIG do not wish their report to be used either in the procurement process or in a future scoping document, as they would not like to take any action that might actually help the planning and construction of a thermal treatment facility in their area.
- Finally, the CIG have prepared a report on the process they have been involved in - namely this document - and this is for dissemination to the community and interested stakeholders. The emphasis of the report has been on the process itself, since this is what CIG members feel it is important for the wider community to be aware of. Presenting detailed concerns about thermal treatment might have the end result of feeding into scoping document, something the CIG are clear they do not wish to do.

What emerges clearly from this survey of the terms of reference is that the members of the CIG feel very strongly that they have been frustrated in their attempts to get answers to many of the questions they have around the whole issue of thermal treatment, from the siting of a proposed plant, to the need for thermal treatment in the first place, right down to plans for handling the extra traffic and pollution that such a plant will lead to in their area.

The CIG members have decided to prepare this report of the process they have been engaged in, outlining some of these frustrations, but also informing the wider community of what the CIG meetings have actually been about. The CIG do not wish this report to be used as part of

the procurement process, and they do not wish it to be used in a scoping document to aid an EIA. Nor do the CIG wish this report to be interpreted as in any way representing the opinions of the wider community. It is simply a record of the process they have been involved in, and the concerns they have raised about this process.

The feelings of frustration and scepticism that are evident from this report are shared by almost all members of the CIG, and lead to a strong sense that this process has been flawed and even a PR exercise from the very beginning. Some people believe that the process has been more of a failure than a success. This is true from a group point of view, since many believe that no consensus of opinion was arrived at, and certainly no strategy was formulated for future action on the part of the group. The main fear however, is that this process will be regarded by authorities as sufficient public consultation for the entire project, and that the questions raised in the course of the process will be simply disregarded while the development proceeds unchanged.

Almost three years ago an incinerator was planned for the Ringsend area under the management of a company called Bio-burn. At this time the local residents campaigned strongly against such a facility in their area, and they were successful in their bid to stop it. Now similar plans for thermal treatment are being made for the region, and some members of CIG believe that it will be up to the public again to make their views heard in a manner that cannot be ignored.

While the members of the CIG have worked hard and given up much of their time to participate in this new process, they believe that it is unlikely that their deliberations or responses will make any difference to the proposals for thermal treatment at Poolbeg. The small CIG committee has not had much success in affecting the process set in motion by Dublin City Council, and now that they have detailed this process to the wider community, it is to be hoped that public opinion might be mobilised to greater effect.

The CIG also believe that this is an issue that extends far beyond the immediate areas of Ringsend, Irishtown and Sandymount. The proposed incinerator is intended to take waste from the entire Dublin region, and so the CIG feel that it is something that affects the entire Dublin population. They would like to see others in the city begin to take an interest in the cause, and not simply leave the fight up to those who live closest to the Poolbeg Peninsula.

## Appendix One

Members of the CIG who contributed to this report:

Lorcan Casey  
Eleanor Devitt  
Colm Duggan  
Michael Fitzpatrick  
Eileen Lawless  
Samuel Mateer  
Rosemary McKean  
Michael O’Kane  
Betty Watson  
Gabrielle Weafer  
Teresa Weafer  
Claire Wheeler

## Appendix Two

The Statutory Stages as Identified by Dublin City Council:

### **Dublin Waste to Energy Project Public Involvement in the Statutory Processes**

The following is a general description of opportunities for the public to be involved in the Statutory Processes in respect of the Dublin Waste to Energy Project. It should be noted that it is impossible at this early stage to give exact details or dates when each process will commence.

It is important to note that notwithstanding the opportunity of members of the public to make submission to Dublin City Council at all stages of the Project, each Statutory Process allows for maximum public involvement and there is an obligation on the part of Dublin City Council to ensure that these opportunities are publicised.

Dublin City Council proposes to appoint a Service Provider to undertake the statutory processes in respect of the Dublin Waste to Energy Project. It is envisaged that a Service Provider will be appointed at the end of 2003 and will begin the necessary preparations for the Planning, Licensing and Authorisation Processes (see below).

Currently all submissions, comments, and objections from members of the public in respect of the Project are made directly to Dublin City Council through the Ringsend Regional Office. This Office was established in October 2000 to facilitate this activity. Submissions and objections will be made in this way until the involvement of the Statutory bodies i.e. when the planning and licence applications are submitted. At that point, all submissions in respect of the project are made directly to the relevant authority, within the period specified in the public notification which is by way of public notices in the newspapers.

The Dublin Waste to Energy Facility will require approval and licences under the laws relating to planning, waste management, integrated pollution control and electricity regulation. Such elements will require separate Environmental Impact Statement (EIS), the

content of which is regulated by law and is subject to the individual requirements of each relevant authority.

### **Approval by An Bord Pleanála**

The facility will require planning approval by An Bord Pleanála under the Planning Acts and the application for such approval will be made to that agency directly.

Once the Service Provider is appointed the preparation of the Environmental Impact Statement will begin and members of the public are invited to make submission during this preparatory phase.

The Planning and Development Act 2000 and regulations made under the Act require local authorities to give public notice that it proposes to apply to An Bord Pleanála for approval and that an EIS has been prepared in respect of the proposed development. Times and places shall be specified where copies of the EIS may be inspected. This inspection period (not less than six weeks) provides the opportunity for members of the public to make submission directly to the Board. The Board may require further information about the development, in which case the period for submissions is extended by a minimum of three weeks.

It is entirely at the discretion of the Board to grant planning approval at this point, or to commence with an oral hearing. If planning approval is given (or not as the case may be), objections can be made directly to the Board, which may result in an oral hearing. During such a hearing, all interested parties will be invited to participate, after which the Board will make its decision.

## **Licence from the Environmental Protection Agency (EPA)**

An Integrated Pollution Control Licence will be required from the EPA. This licence outlines the specific details in relation to controls and limits on the emissions and discharges as well as outlining operational conditions. This Licence, if granted will be subject to review and possible modification by the Agency. A waste licence may also be required from the EPA depending on the exact nature and extent of the operation of the proposed plant.

The Licensing Process is not dissimilar to the Planning process in that there is a requirement on behalf of the applicant to publicise the intention to acquire a Licence. The application is submitted to the Agency and made available for public inspection. Members of the public are invited to make submissions. The application must be accompanied by an EIS. Once the EPA has deemed the application valid, the application is examined in detail. In the case of a successful application the Agency will publish a draft Licence that will be made available to the public for the purpose of making submissions. The Agency can reserve the right to inform the decision making process by convening an oral hearing. At all stages throughout this process there are clearly defined opportunities for the public to make submission. All reasonable steps will be taken to provide the necessary public notices.

## **Authorisation and Licences relating to electricity**

The project will require an authorisation from the Commission for Energy Regulation to construct an electricity generation station and a licence to generate and perhaps also to supply electricity. An EIS is required in this regard.

Such an authorisation will be sought subject to the successful completion of the planning and licensing processes.

## **Compulsory Acquisition of Land**

The procedures relating to the compulsory acquisition of land, provide for confirmation by An Bord Pleanála. The inspector conducting an oral hearing may also require the submission of an EIS. The City Council has earlier indicated in the public notice relating to the CPO that an EIS is to be prepared.

The authority to acquire land compulsorily is contained in the Housing Acts and Planning and Development Act 2000. The latter Act changed confirmation powers of CPO from the Minister to An Bord Pleanála (cf. Section 214 of Act).

Individual written notices are served on owners, lessees and occupiers (except tenants for a month or less).

Requirements regarding service of notices are dealt with in Housing Act 1966 (Acquisition of land regulations 2000). Objectors (parties with a legal interest in the land) have 21 days to lodge objections to the Board following the service of notices.

The Board cannot confirm the CPO until an oral hearing is held into any objections that may be made and until it has considered the objections and the report of the person who held the oral hearing.

### Appendix Three

The following is a series of verbatim quotes that arose in the course of interviews and meetings with the members of the CIG. This allows the differing opinions, and many of the urgent concerns to be encapsulated in the group's own words.

“People [Dublin City Council & M.C. O’Sullivan] have been taking information from this stuff and organising it in ways to suit themselves.”

“The timescale involved was way too short, especially since the experts themselves had years to prepare all of this stuff.”

“There was no cohesiveness in the group...when you put a group of relative strangers together it's very hard for them to work on a plan.”

“It just shows the patriarchal attitude the authorities have always had to the members of the community.”

“I'm not sure if I was selected to be selected [for participation in the CIG process]”

“I started with a relatively open mind. I thought I'd come and I'd try and make my mind up as to what to make of what was going on.”

”The process should have given me a bit more confidence in what was happening, and the main purpose of the process should have been to instill that sort of satisfaction in people and allay concerns, and in fact it has only done the opposite.”

“It may have set out to do a certain job...but I feel the process has failed.”

“I came with an open mind, but now I'd be very much against the whole thing as a result of what we've had to put up with.”

“It's information overload.”

“It’s just as bad as getting no information.”

“There seems to be very little integrity in relation to the process...they [Dublin City Council and M.C. O’Sullivan] don’t seem to have a problem with conflict of interests.”

“The independent facilitator was paid for by M.C. O’Sullivan, and some of the experts were brought along to advance the case for incineration.”

“The authorities have lied and misled the people that are coming to these meetings.”

“If this group feeds into the procurement document this will be their [Dublin City Council and M.C. O’Sullivan’s] public consultation.”

“They [Dublin City Council and M.C. O’Sullivan] made a decision that was not their’s to make [about thermal treatment plant and its siting].”

“They’re bringing the people in after the fact.”

“They’ve put the cart before the horse in the whole process...it’s all been done backwards.”

“I wasn’t really ready for dealing with the experts and their opinions, because I was still trying to get a handle on this pre-preparation stuff.”

“The City Manager stood up and said it was all down to his decision in the end...so that meant that what we were saying didn’t matter!”

“The whole waste system is based on economics, not on best practice or best technology ...in economics, minimum standards apply... It’s big business.”

“When there are going to be hundreds of millions spent, wouldn’t you think that they would go for the best?”

“Any kind of accident will be catastrophic.”

“If it’s so safe, it could be put anywhere.”

“They [the CIG members] couldn’t agree on anything.”

“My main concern would be with the emissions - in the air, and in the water and in the ground.”

“The traffic thing is huge - you’re talking about hundreds of trucks a day.”

“The traffic in Ringsend is already a big problem.”

“The people here have very high rates of asthma, and very high rates of depression - and this will only make a bad situation worse.”

“I feel very frustrated about the whole thing, because I wasn’t mandated to represent the community, but they keep on saying that we do represent them.”

“I’ve had people telling me I’m for the incinerator - but I’m not. I’m just trying to find out how to stop it.”

“I still came out [of the meetings] wondering why I was there - and I’m still wondering!”

“I’ve never seen Big Brother, but that’s what it reminds me of - people from all over just put in a room together and told to get along.”

“We stayed on board to ask the hard questions, but we haven’t got any answers.”

“It’s all a done deal - they won’t pay any attention to what we’ve said, and they’ll go ahead and build the thing anyway.”

“I really feel it’s a PR exercise, from the beginning.”

“If we feed into scoping we’re doing a developer’s homework for them.”

“I’d be considered an expert in my own field, and I don’t ask people what I should take account of when I’m doing my job.”

“One of our terms of reference was to assess the work done by Dublin City Council in determining the need for thermal treatment, and I don’t think we have had a proper chance to do that.”

“I’m really worried that if we don’t put something into scoping about our concerns that the developer will think that we don’t have any concerns.”

“If we feed into scoping we’re helping the process forward.”

“How can you help the process if you’re against it?”

“I think if we include really hard questions in the scoping document, that we’ll get something that they won’t be able to answer.”

“When this process is over, I don’t want to be involved again.”

“The group have worked very hard, and we’ve been very analytical, and we’ve stuck it out to the end.”

“It’s down to the public now - they have to get mobilised and protest this thing.”

“It’s a problem for all of Dublin - it shouldn’t just be left up to Ringsend to fight it.”

